From: Neil Salmond
Sent: Tuesday, February 11, 2014 2:36 PM
To: CEQA Guidelines
Subject: LOS Alternatives

Dear Mr Calfee,

Congratulations to the state, governor and OPR on this important initiative. I am writing from Vancouver, BC but have been a resident of California on several occasions in the past.

I am trained in finance and climate mitigation policies and in the last three years have received a thorough education in the principles of good urbanism, which is fundamental to the economic and environmental health of cities, states and nations. Specifically, car-first regulations such as parking minima, single-use zoning and LOS undermine traditional development patterns of walkable neighbourhoods, which in turn undermine politically/pragmatially most any attempt to price carbon, develop neighborliness and community, and support an ecosystem of diverse and resilient small businesses. As long as our rules favour the big box, the stroad arterial and the cookie-cutter cul-de-sacs, those are what we'll get.

Regarding your proposed amendments, I'm not convinced that more complicated metrics are necessary. For example, directly targeting GHGs risks missing the forest for the trees. The forest you're building is walkable cities (or truly rural landscapes) where travel on foot (aided sometimes by bikeshare, transit taxis) is the natural choice.

Instead, I'd recommend assessing transportation planning in the following two ways:

* Recognise induced demand. Instead of building infrastructure to meet some forecast demand, instead build the infrastructure that will induce the economy you want to see. Deal with congestion by a) pricing and b) dedicating space to more space-efficient travel modes (i.e. not cars).

* Distinguish between STREETs and ROADs, which is really synecdoche for urban vs rural. The goal for ROADs should in fact be LOS A, met by high speed geometry of wide lanes, wide turns, no intersections etc. You can dedicate lanes to transit, HOT. ROADs are all about A-to-B asap. STREETs, on the other hand, are outdoor rooms. The goal must be LOS E, a top speed of 30mph, maximum 50% of the ROW for cars. A special rare type of street is the Great Street (the avenue, boulevard) which is wider, and may have dedicated transit lanes. Great Street design needs a lot of attention, but in general the top speed should still be low, but there should be no or far fewer interruptions: the bus rapid transit should ONLY stop at stops, and have priority at intersections. Look to multiway boulevard designs.Great streets meet at neighbourhood centres, with grand pedestrian space. Giving over arterial intersection space to car traffic is a huge travesty of opportunity cost.
* When you don't distinguish streets and roads - when you slow up an inter-municipal road with curb cuts and signals; or when you ruin an urban street with rural road features like multiple

wide lanes - you end up with STROADs which are economically destructive all round: inefficient to drive, unpleasant to walk (or wait for a bus).

Economically, the key metric is probably the **subsidy per person moved**. So for single-occupancy vehicles, that require a lot of surface and wear that surface more with a heavy, stop-start accelerating vehicle (F=ma), the metric is poor. For two feet walking, the metric looks great.

Congratulations again on this important work, and I hope your efforts are noticed by every other state and by the Canadian provincial DOTs.

Neil