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Darrell Johnson
Chief Executive Officer

February 14, 2014

Christopher Calfee, Esq.
Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Re: Orange County Transportation Authority's Comments on "Preliminary Evaluation of Alternative Methods of Transportation Analysis"

Dear Mr. Calfee:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to comment on the Office of Planning of Research's (OPR) document entitled, "Preliminary Evaluation of Alternative Methods of Transportation Analysis." Understanding the significance of revising transportation analysis standards that have been around for decades, OCTA is specifically grateful for OPR's early consultation efforts as it implements the provisions of SB 743 (Chapter 386, Statutes of 2014).

As a transportation planning agency and public transportation provider, OCTA supports the concept of in-fill development projects that can help lower vehicle miles traveled and greenhouse gas emissions by reducing the distance between jobs and houses as well supporting the implementation of new transit services that improve mobility. We also recognize that in-fill projects are difficult to implement given adjacent development and lack of right-of-way for transportation improvements in urban areas. Therefore, we support the intent of SB 743 to promote in-fill development projects that improve the quality of life for residents and workers.

In OPR's "Preliminary Evaluation of Alternative Methods of Transportation Analysis" several innovative methods to evaluate the transportation impacts of in-fill development within the context of California Environmental Quality Act (CEQA), as well as in a broader context, are suggested. While OCTA supports OPR's efforts to develop these measures to better capture active transportation and public transit benefits, we have major areas of concern related to the technical application of the current recommendations. In addition, while alternative metrics may make sense when used in locally specified infill development areas, using the metric in other areas, especially rural or greenfield areas may not provide the accuracy necessary to fully evaluate environmental impacts.

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While SB 743 calls for alternative metrics beyond level of service (LOS) to be used, specifically in infill areas, the complete elimination of the metric may require drastic changes to local planning documents. OPR's preliminary evaluation document does not currently take into account the significant time and effort that would be required to make the transition. The paper states that "many jurisdictions current use level of service...to assess potential traffic impacts during a project's environmental review." In Orange County, all 35 local agencies in Orange County have traffic LOS standards in General Plans that link to mitigation and monitoring requirements prepared as part of final CEQA approvals, development approvals, and developer fee programs that include specific funding commitments. We encourage OPR to consider the potential impacts that abandonment of LOS could have on these approvals and commitments in the absence of a consistent replacement for LOS. Additionally, the legal issues raised with replacing LOS with other measures could introduce major legal risks into the CEQA process. For instance, consideration should be given to how LOS is used in federal law, especially as it relates to National Environmental Quality Act analysis and transportation reporting requirements. We encourage OPR to consult with legal experts on this matter.

Furthermore, LOS, in combination with other types of metrics, may still provide usefulness in analyzing project impacts. We have found that LOS (using the simple intersection capacity utilization [ICU] method) is a useful measure for gauging transportation system performance over time. In 1991, the Orange County Congestion Management Program (CMP) identified 14 intersections that operated at deficient levels of service. Over the last 22 years, capital improvements have been completed to improve congestion at these locations including lane additions, roadway widening, signal modifications, and signal synchronization. The results are impressive with an average LOS improvement and congestion reduction of 40 percent comparing 1991 to 2013 and accounting for traffic growth.

Delay at intersections is a constant complaint from Orange County residents and workers. This delay results in congestion and reduced air quality. Air quality procedures require the use of LOS and intersection delay to calculate emissions, including greenhouse gases and the regulated emissions. Pollutant emissions increase when vehicles travel at a low average speed and when idling at intersections. This fact is encompassed in nearly 40 years of air quality and transportation science research and practice that must continue to be considered in the environmental planning process. We encourage OPR to broaden the discussion of traffic intersection delay and air quality impacts to

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include traffic engineers, the transportation science academic community, and air quality planning professionals.

However, we concur that there are problems with using LOS as the single methodology in evaluating transportation impacts related to CEQA mitigation. Continually adding intersection capacity is unrealistic in the long-term, and we agree that multiple methodologies should be developed and used for evaluating the transportation impacts under CEQA. Additionally, allowing for multiple methodologies will result in community values and preferences in evaluating transportation impacts. To address this issue, OCTA will be evaluating the use of Multimodal Level of Service for ten key intersections in Orange County. This effort will start in early 2014 and conclude by the end of the year. We would welcome the opportunity to share results with OPR at the appropriate time.

We understand OPR's interest in including vehicle miles traveled (VMT) as an alternative to LOS. In fact, OCTA uses changes in VMT as part of our long-range transportation planning process. However, this measure is difficult to calculate accurately as it typically requires a four-step travel demand model that accounts for trip generation, trip distribution, mode choice, and traffic assignment. Further, the California Air Resources Board's (ARB) air quality model requires VMT to be segregated by speed to evaluate before and after air quality results. While simpler methods may be available, they have limited accuracy, are not consistently applied, and cannot adequately represent differences in speeds associated with VMT. Therefore, the use of four-step models and ARB's air quality model is the standard practice in the industry to evaluate air quality changes in relation to VMT changes. Any OPR recommendations must provide specific guidance related to the use of these regional travel demand models and air quality models. We encourage OPR to consult with travel demand and air quality experts including those at the Southern California Association of Governments, ARB and private sector consulting firms about standardizing the calculation and application of VMT for the consistent evaluation of projects.

Finally, we note that the draft document includes several possible mitigation measures for each alternative metric. Some of these mitigation measures could substantially alter project proposals. For example, in-fill residential projects cannot always include transit project elements and live-work units. The language that suggests "locating the project in neighborhoods that supply transit or active transportation opportunities" is well beyond the scope of project-level mitigations. Clarification should be provided on the specific types

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of projects the proposal does and does not affect: in-fill development, greenfield development, transportation improvement projects, and other potential projects.

Again, we appreciate your early consultation efforts on upcoming changes to the CEQA guidelines, and support the concept of in-fill development to reduce VMT and improve air quality. However, with these changes, OPR is introducing tremendous legal and technical uncertainty into the CEQA process, particularly for projects planned or in-progress. We strongly encourage OPR to broaden the current discussion to include legal experts, air quality professional, traffic engineers, the transportation science academic community, and local agencies to ensure uniform and consistent application of thresholds of significance. If you have any questions please contact Kristin Essner, Principal Government Relations Representative, at (714) 560-5754.

Sincerely,



Darrell Johnson
Chief Executive Officer

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c: Sloat Higgins Jensen & Associates