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February 12, 2014

Ken Alex, Director  
Governor's Office of Planning and Research  
1400 10th Street  
Sacramento, CA  
95812-3044

**RE: Preliminary Evaluation of Alternative Methods of Transportation Analysis**

Dear Mr. Alex,

Thank you for the opportunity to provide feedback on the *Preliminary Evaluation of Alternative Methods of Transportation Analysis*. On behalf of the Planning and Conservation League, a longtime champion of CEQA and good planning in California, I urge your consideration of the following comments.

SB 743 provides an important opportunity to better align CEQA with the overarching goals of improving mobility, reducing greenhouse gas emissions, and building healthy communities. We appreciate OPR's early attention to the critical issue of identifying a suitable metric to replace Level of Service (LOS) in CEQA analysis.

We recommend that you focus on Vehicle Miles Traveled (VMT), or some variation thereof, as the most suitable metric. As your evaluation points out, VMT is straightforward to analyze, captures the effects of regional location, and indirectly accounts for the benefits of active transportation and transit projects. Importantly, VMT's inclusion in CEQA would align project-level decisions with the state's larger planning framework, notably SB 375, and with regional policies and investment priorities embedded in the RTP/SCS.

We recommend that the new metric should be applied statewide, not just in TPAs. Having two separate methods for TPAs and non-TPAs will be burdensome and confusing for lead agencies, project applicants and community stakeholders. A single, uniform set of thresholds will simplify the CEQA process.

The shift from LOS to VMT will result in better outcomes in all types of communities, from city centers and TOD districts to suburban and exurban neighborhoods. Indeed, many older suburbs and residential neighborhoods are taking steps to make their communities more walkable, bikeable and transit-friendly. Removing LOS from the CEQA equation and replacing it with VMT will reduce barriers to bike lanes, streetscape improvements, infill development and other projects in these communities.

As we shift away from LOS, it is important to ensure that localized impacts associated with increased traffic – such as pedestrian safety, noise and local air quality – remain a priority for CEQA analysis. As part of this CEQA guidelines update, I encourage OPR to carefully review how the guidelines address these impacts and recommend any needed changes to ensure impacts are fully addressed and mitigated.



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Lastly, we want to urge you to ensure that *all* projects, including land use and transportation projects of all sizes, are subject to the same transportation analysis standards under CEQA. Whether a bike lane or a bypass, a stadium or a shopping center, any CEQA project that may have transportation-related impacts should use consistent metrics for evaluating those impacts.

Thank you for your consideration of our input.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Reznik', with a long horizontal flourish extending to the right.

Bruce Reznik  
Executive Director