

PHA Transportation Consultants

2711 Stuart Street Berkeley CA 94705

Phone (510) 848-9233

Web www.pangho.com



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

Dear Mr. Calfee:

I am Pang Ho, owner and principal of PHA Transportation Consultants in Berkeley. I have more than thirty years of experience in transportation planning and traffic engineering. I began my professional career in 1982 first working for three cities and then two consulting firms respectively for about ten years prior to starting my own firm in 1992. My work mostly involves traffic impact studies, capacity LOS analyses, operation studies, and traffic data collection.

As a traffic consultant, I have prepared many traffic impact studies for various land development projects for planning, environmental planning firms, civil engineering firms, architects and local jurisdictions as part of the CEQA process. Many of my traffic studies were incorporated as part of the Initial Studies, Mitigated negative Declaration, and EIRs.

I recently have the opportunity to review the paper titled "Preliminary Evaluation of Alternative Methods of Transportation Analysis" December 2013, which considered the current traffic LOS analysis is problematic and may need revision. Major problems with the current traffic LOS analysis cited are:

1. It's difficult and expensive to calculate;
2. It's bias against the "last in" development;
3. LOS scale is too small;
4. LOS mitigation is itself problematic;
5. LOS mischaracterize transit, bicycle, and pedestrian improvements as detrimental to transportation;
6. Use of LOS thresholds implies false precision;
7. As a measurement of delay, LOS measures motorist convenience, but not a physical impact to the environment.

To some extent, all of the problems cited above are true. Traffic LOS analysis can be expensive, time consuming, and measures mostly motorist convenience and does not do much in evaluating traffic impact on the environment. But this is exactly what the traffic LOS analysis approach is designed for; to evaluate traffic impact of new development projects on the street and circulation system, not the impact on the environment as CEQA intended. I believe CEQA incorporated the traffic LOS analysis into the CEQA documentation since traffic impact has been a major issue with local jurisdictions that CEQA had to include it in the environmental analysis for political reasons.

I appreciate OPR's effort looking into updating the traffic LOS analysis portion of the CEQA requirements. I think it's a good idea that CEQA to develop a new set of criteria and metrics to measure the transportation impact of new development projects on the environment, however CEQA defines it, and not street and circulation system that was intended with the current traffic LOS approach.

I have briefly looked at the preliminary/proposed criteria and like to offer my comments as follows:

Vehicle Mile Traveled (VMT)

This is a good measure and such data is available from regional traffic models in most metro area but I am afraid it could be a problem to get this data for smaller rural jurisdictions where traffic models are not available. CEQA, or another agency may have to compile this data for various trip lengths such as work trips, shopping trips, school trips, etc. It should be noted that this is mostly a broad scale evaluation on the environment and may not address the concerns of the immediate area (residents in the adjacent area of the development may demand more specific and localized evaluation). Traffic LOS studies can address the specifics as a separate document.

Automobile Trip Generated

This is a also good measure and data is readily available from the ITE Trip Generation Manual for most land use types.

Multi-Modal Level of Service

The 2010 highway Capacity Manual has developed a new set of method and criteria for multi-modal LOS analysis and it includes LOS analysis for other modes such bicycle and pedestrians traffic in addition to vehicle traffic, but most jurisdictions are slow to adopted it for some reason. I would also caution that the MMLOS may create problems cited previously..... being time consuming, expensive, difficult to calculate and addresses mostly a localized area.

Fuel Use

This could be a good indicator by itself, but to some extent the vehicle mile traveled would have addressed this.

Vehicle Hours Travel

This is another good indicator, but to some extent, the vehicle miles travel would have addressed this.

Presumption of Less Than Significant Transportation Impact Based on Location

I believe this would have been addressed in the automobile trips generated. Perhaps in addition to auto trips generated, add transit trip and walk trips generated as well.

Other Thoughts

I think it is a good idea for CEQA to develop a new set of metrics to evaluate the transportation impact of new development on the environment instead of using the Traffic LOS approach which is designed to evaluate traffic impact on the street and circulation system and identify physical mitigation in most cases. With the proposed preliminary metrics, the next challenge would be to develop a new set of significant thresholds; this may be difficult but can be done.

Supposed CEQA successfully develop and implement a new set of criteria to evaluate transportation impact on the environment, local jurisdictions and even state agency such as Caltrans would still require traffic LOS studies to evaluate traffic impact on its streets, freeways and the overall circulation systems. Does that mean new developments must submit two separate documents, one for traffic impact analysis for local jurisdictions and another environmental transportation impact for CEQA? What would be the implication when the two documents arrive at different conclusions?

I appreciate the opportunity to review and comment, please keep me up to date with any development.

Thank you.



Pang Ho AICP
Principal