



## SANTA CRUZ COUNTY REGIONAL TRANSPORTATION COMMISSION

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February 14, 2014

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

Re: Comments on alternative transportation metrics

Dear Mr. Calfee:

The perspective from which the transportation system performance is viewed has changed based on a shift to multimodal transportation systems, SB 375, Complete Streets Act legislation, Caltrans Smart Mobility 2010, and a focus on sustainable and livable communities. In some cases, traditional metrics of performance are incompatible with state and regional planning goals. Measures play an important role in policy making, assessing transportation impacts of development, and prioritizing investments.

The Santa Cruz County Regional Transportation Commission recently designed and evaluated the region's long range transportation plan using a sustainable framework and measures that were congruous with sustainable outcomes. The new tool, the Sustainable Transportation and Analysis Rating System (STARS), provided the foundation for developing a plan based on the triple bottom line definition of sustainability and linking performance measures to specific sustainable outcomes.

The Santa Cruz County Regional Transportation Commission supports efforts to better align transportation performance measures utilized in CEQA review with sustainable indicators. Staff supports consideration of the following as alternative methods of transportation analysis:

- Vehicle miles traveled (VMT) is becoming a standard measure to evaluate greenhouse gas emissions and also can serve as a proxy for measuring progress towards health, and economic goals. Although VMT has limitations, for example it does not serve as an indicator of delay, a strong benefit of using VMT is that data collection and projections using VMT are becoming more widely available for small and medium sized transportation agencies.
- Access analysis is a key part of evaluating transportation impacts. Access (as opposed to mobility) serves as the most direct indicator of how well the transportation system meets its primary purpose of connecting people with goods and services and can be an important measure for evaluating the distribution of impacts amongst unique population groups. An access analysis is also one of the few measures that capture the *quality* of the transportation system, which is of particular importance to encouraging bicycle and pedestrian trips. Access analysis can range in the level of sophistication, depending upon the data available, typically using a geographic information system, which is becoming a standard tool used by many transportation agencies.

Finally, results of transportation analysis used to inform policy makers and the public about transportation impacts are only as good as the data behind them. New and predictable sources of funding for data collection and modeling should be provided to support comprehensive and accurate results.

Sincerely,

A handwritten signature in blue ink that reads "George Dondero". The signature is written in a cursive style with a large, prominent initial "G".

George Dondero  
Executive Director