
From: samer momani
Sent: Friday, February 14, 2014 1:56 PM
To: CEQA Guidelines
Subject: LOS Alternatives

Dear Mr. Mr. Christopher Calfee,

I would like to thank you for your SB 743 efforts toward sustainability and livability and I would like to share the following input and answers for your consideration:

a. Are there environmental impacts related to transportation other than air quality (including greenhouse gas emissions), noise and safety? If so, what is the best measurement of such impacts that is not tied to capacity?

- Aesthetics, community character, and glare: usually addressed through visual impact assessment, context sensitive solutions, and “dark sky” ordinances.
- Vibration: usually linked to noise, but indirectly addressed under impact analysis to historical buildings, sensitive receptors and land uses (i.e., research facilities, laboratories, studios), and less frequently to confined farmland animals.
- Privacy, security, and public access issues. Preserving public access, careful design, proper lighting, and insuring “more-eyes-on-the-street” will usually suffice.
- Long term maintenance and liability requirements and activities. Usually addressed under maintenance agreements and encroachment permit process.
- Short-term construction impacts. This includes temporary traffic delays, detours, and closures, in addition to noise, air quality, visual, and stormwater impacts.
- One additional socio-economic and environmental impact often overlooked is the amount of resources spent on satisfying LOS for peak-hour congestion and often 20 years into the future. LOS is often used as the justification for a transportation improvement project, critical to satisfy its purpose and need.

b. Are there transportation-related air quality, noise and safety effects that would not already be addressed in other sections of an environmental analysis (i.e., the air quality section or noise section of an initial study or environmental impact report)? If so, what is the best measurement of such impacts that is not tied to capacity?

See topics covered above.

c. Would consistency with roadway design guidelines normally indicate a less than significant safety impact?

Normally, yes! But, in certain cases traffic operations, environmental and weather conditions, special events, or maintenance work could have unpredicted safety implications.

2. What are the best available models and tools to measure transportation impacts using the metrics evaluated above? SB 743 allows OPR to establish criteria “for models used to analyze transportation impacts to ensure the models are accurate, reliable, and consistent with the intent of” SB 743. Should OPR establish criteria for models? If so, which criteria?

The best strategy is to utilize a Context Sensitive Solution model, combined with multi-jurisdictional partnership and open and transparent communication focusing on the three E’s (Economy, Equity, and Environment). Based on early stakeholders’ engagement and based on community values, a project development team could select multiple metrics that would provide a wide base of support and an acceptable range of alternatives. A simplified screening tool or checklist with established thresholds is recommended before a details level of analysis would be required. Gradually, move away from LOS or MMLOS into VMT-per-Capita or combination of Annual-Delay-per-Capita, [fossil] Fuel-per-Capita, and Average-per-Capita-Travel-Time. Please select a metric that will likely reduce non-renewable energy consumption and factor the long term costs for maintenance and operation.

Caltrans with assistance from EPA Smart Growth Implementation Assistance program developed the Smart Mobility Framework, which is based on the following principles: location efficiency; reliable mobility; health and safety; environmental stewardship; social equity; and robust economy. For further information, please review Caltrans Preliminary Investigation titled “Sustainability Tools and Practices: An Examination of Selected State Departments of Transportation, California Metropolitan Planning Organizations and National Tools”, available online:

http://www.dot.ca.gov/hq/tpp/offices/ocp/smf_files/Caltrans_Smart_Mobility_Preliminary_Investigation_3-21-13.pdf#zoom=75

3. SB 743 provides that parking impacts of certain types of projects in certain locations shall not be considered significant impacts on the environment. Where that limitation does not apply, what role, if any, should parking play in the analysis of transportation impacts?

Context Sensitive Solution model should be implemented. Parking could slow traffic along local streets and shield pedestrians from fast moving traffic. Sensitive land uses for removing or reducing parking availability without mitigation include emergency service providers and hospitals, airports/seaports, and major transit stations, and areas designated as Main Street or Downtown Districts in a local plan. Farmer’s market and swab-meet type businesses also could be impacted. New development should insure shuttle service and TDM is included if parking is not provided. Parking inventory on a county or city level should be prepared for further examination.

Thank you,
Samer Momani,