

Via Email

October 8, 2014

Subject: Proposed SB 743 Implementation Rules

Dear Office of Planning and Research:

Below are my comments regarding the proposed SB 743 implementation rules.

1. Criteria for Analyzing Transportation Impacts – Section 15064.3 (b) (1) – Land Use Projects

The proposed language says that VMT for land development projects should be compared to existing conditions. This should be modified to include the option of comparing the projects to baseline conditions if the project is not expected to open for many years. Often a project is analyzed based on what is happening in the future especially if it is not expected to open for many years like freeway projects. By doing this, it will enable the project to factor in background population & employment growth as well as new infrastructure improvements.

2. Criteria for Analyzing Transportation Impacts – Section 15064.3 (b) (2) – Transportation Projects

- A. The proposed language includes a list of projects that do not add to physical capacity for automobiles including transit lanes. The list should be extended to include rail – light rail, heavy rail, commuter rail, streetcar, etc.
- B. In some cases, it is desirable to increase roadway capacity if it means also increasing travel speeds for transit especially in congested areas. Increasing transit travel speeds means faster travel times for users, better on time performance and less money needed for transit operations. It is not clear in the current language if instances such as this can be counted as operational improvements.

3. Criteria for Analyzing Transportation Impacts – Section 15064.3 (b) (3) – Local Safety

Implementing transportation or land development projects that result in implementing sub-standard lanes for buses to travel in for the sake of other goals is not desirable. This is happening now in Los Angeles. Buses need at least 11 feet. If it is a shared bus-bicycle lane, then it really needs to be 17 feet.

4. Potential Mitigation Measures – Appendix F D (6)

- A. Traffic Calming does not necessarily lead to a reduction of VMT. Traffic calming is about reducing vehicle speeds for a given set of streets. It does not automatically mean that people will then shift to other mode, go someplace else or forgo making the trip altogether. Often, it just means forcing many of these trips onto overly subscribed streets which in the grand scheme of things often does not do much to improve the situation on an area wide basis.

B. Limiting Parking Supply or making it more expensive could actually increase VMT and congestion. Why, because people will often spend more time looking for cheaper parking and/or street parking rather than not driving. This phenomenon occurs all the time like in areas such as Brentwood, Hollywood and Echo Park in Los Angeles. They are very dense neighborhoods with significant levels of transit service and serve parking supply constraints. Yet despite all this many folks will still rather drive and spend extra time and effort looking for cheaper parking and scarce street parking.

5. Appendix F – Models for Estimating VMT

The language should state that any model used for estimating VMT should be calibrated with enough data and prove that it is statistically valid. Just because a reputable private firm or agency puts together something, it does not necessarily mean that the model is valid or that enough data was used to estimate it.

6. The Concept of only Using VMT instead of LOS

It may also be wise to analyze travel speeds in addition to VMT. One of the primary reasons in switching from LOS to VMT reduction is to reduce greenhouse gases and air pollution. Greenhouse gases and air pollution is function of travel speeds. It turns out though that some pollution emission rates are actually higher at lower speeds. Take for example CO emissions rates by speed for gasoline powered cars (Chart 1). The chart shows much higher emissions at 5 and 10 mph than at 25 mph. In fact the rates continue to decrease until 60 mph where it starts to pick up again. So if traffic slows down too much and the mitigations measures do not result in significant mode shifts, then this may actually increase greenhouse emissions which go against the intent of using measures other than LOS.

Also as traffic speeds go lower, transit speeds in most cases will be lower too since they have to use the same travel lanes as other motor vehicles. This in turn will make transit less attractive, less reliable and more expensive to operate. Supporting transit is critical since it can carry more people faster and further than other non-driving alone modes. So travel speeds is still an important factor to consider.

Sincerely,

Stewart Chesler, AICP

Chart 1

