



February 14, 2014

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

RE: Preliminary Evaluation of Alternative Methods of Transportation Analysis

Dear Ken,

Thank you for the opportunity to provide feedback on the *Preliminary Evaluation of Alternative Methods of Transportation Analysis*. TransForm is the State's largest non-profit focused on sustainable communities. Last week our Board adopted a new mission of *creating walkable communities with excellent transportation choices to connect people of all incomes to opportunity, keep California affordable, and help solve our climate crisis*. OPR's efforts to replace LOS with a new metric are perfectly aligned with this mission.

We appreciate that the goals and objectives set forth in your preliminary evaluation extend beyond CEQA-related environmental impacts and include equity and health. While this effort is focused on CEQA per SB743, this new metric can be applied to the broader transportation planning practice in California to move us toward the goals of improving mobility, reducing greenhouse gas emissions, and building healthy communities.

We support Vehicle Miles Travelled (VMT), or some close variant, as the new metric. This aligns with our GreenTRIP certification program, which is aimed at providing in-fill residential developers with strategies to reduce vehicle trips early in the development process. While the public and decision-makers are now familiar with LOS as a measure for impacts, GreenTRIP and other such models have shown the benefits of providing clear information about how well designed developments can have greatly reduced VMT. It provides a tool for community members, developers, and city staff to focus on

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

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and community stakeholders. A single, uniform set of thresholds will simplify the CEQA process.

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.

Additionally, this new metric may require refinements to existing models and tools as well as research to validate the results. As highlighted in our soon-to-be released Strategic Plan, TransForm in partnership with other groups, has started conducting research, collecting empirical data, and may soon develop tools to quantify the emission benefits of investing in transportation choices and affordable in-fill development. Ideally OPR and other state agencies could play a leadership role in this arena.

Thank you for your consideration of my input. I am happy to discuss any of these concepts further.

Sincerely,



Stuart Cohen
Executive Director
TransForm