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Subject: CEQA Level of Service measurements and traffic projections

Dear Mr. Calfee,

I am aware that this may too late a date to submit this message but I humbly request you consider it if you are able.

I have become aware that the California Environmental Quality Act (CEQA) is being amended to help California reduce greenhouse gases and that CEQA currently requires project evaluation for traffic congestion using complex Level of Service (LOS) measurements and traffic projections for motor vehicles - even for projects that are intended as transit-oriented developments (TOD).

I am a professional engineer. I work primarily on drainage design for roadway projects. In this capacity, I frequently see LOS figures and I am alarmed. As they exist, the LOS standards militate against sensible measures to shift away from single driver motorized modes of transportation. They are being used, in effect, to prevent bike lanes in order to protect road capacity based on estimates decades in the future. Cities steer clear of basically sensible bike- and transit-friendly options out of fear of being sued for exceeding CEQA LOS thresholds - even for project that are centered around public transit or at the hubs of popular bicycle routes.

This is insane! Every year things remain as they are means dozens more projects that will be planned with acres of new lanes and far too little movement toward bike- and transit-friendly cities!

A this moment in history, with even a Republican governor throwing his weight behind measures to reduce carbon dioxide emission, California should be going the other direction from planning for more cars. I urge you to revise the CEQA Transportation Guidelines to, instead, ask whether a given project would increase vehicle miles traveled (VMT) rather than rely on LOS or, better yet, to specifically encourage non-motorized travel.

Thank you for your consideration.

Ulysses Hillard, PE