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Mr. Mattson and Mr. Gerving:

The Coalition for Responsible Transportation Priorities (CRTP) is an organization whose mission is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast of California. CRTP appreciates the opportunity to comment on the proposed Greater Eureka Area Traffic Impact Fee (GEATIF).

CRTP supports the idea of a traffic impact fee in the area. That is, we agree that local developers should pay their fair share of the costs associated with the transportation impacts of their developments. However, we do not believe that level of service (LOS) is an appropriate basis for measuring transportation impacts or for directing GEATIF revenues, as has been used by consultants TJKM in their initial report.

LOS is an outdated metric which is increasingly recognized as leading to unintended consequences when used to measure the impacts of development and to determine appropriate mitigation. One researcher succinctly summarizes: "The use of LOS is often criticized for its bias towards automobiles at the expense of bicycling, transit, and walking, and it complicates smart growth or compact development."¹ We agree with this criticism.

Furthermore, the use of LOS and other measures of automobile congestion to assess transportation impacts has led to mitigation measures which add automobile capacity to the road system. This tendency can be seen in the TJKM report, which includes several capacity-adding projects in its list of proposed uses for future GEATIF revenues. However, there is a growing consensus in transportation planning that adding capacity

¹ Henderson, Jason. 2011. "Level of service: the politics of reconfiguring urban streets in San Francisco, CA." *Journal of Transport Geography* 19(6): 1138-1144.



induces new travel and does not reduce congestion. We highly recommend that County and City staff review the literature on induced travel. A recent policy brief for the National Center for Sustainable Transportation, appropriately titled “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion,” contains a concise summary.²

The increased vehicular traffic and neglect of alternate transportation options which result from use of LOS as a transportation impact metric make it ill-suited for two of the most urgent tasks in transportation planning today: reducing greenhouse gas emissions and designing livable communities. In recognition of these facts, SB 743 directed the Governor’s Office of Planning and Research (OPR) to replace LOS standards in the CEQA Guidelines with a new measure which reflects the need to “promote the state’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations.” In response, OPR is currently in the process of finalizing CEQA Guidelines revisions which direct the use of vehicle miles traveled (VMT) as the new metric for measuring transportation impacts. As OPR notes in its latest proposal, “vehicle miles traveled directly relates to emissions of air pollutants, including greenhouse gases, energy usage, and demand on infrastructure, as well as indirectly to many other impacts including public health, water usage, water quality and land consumption.”³

We strongly urge the GEATIF to follow the lead of the new CEQA Guidelines and use VMT as its measure of transportation impacts rather than LOS. Furthermore, keeping in mind all of the direct and indirect impacts for which VMT is an important indicator, mitigation projects funded through GEATIF revenues should not seek to add vehicular capacity to local roads. Rather, GEATIF revenues should mitigate increases in VMT caused by new development by funding projects which reduce emissions, improve local health and welfare, and reduce infrastructure degradation—notably improvements to bicycle, pedestrian, and mass transit infrastructure and service.

Thank you for your consideration of our comments.

Sincerely,

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² Handy, Susan. October 2015. “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion.” National Center for Sustainable Transportation. Available online at http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf.

³ Governor’s Office of Planning and Research. January 2016. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Available online at https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf.