

Communication from Public

Name:

Date Submitted: 07/29/2019 04:00 PM

Council File No: 14-1169

Comments for Public Posting: The Honorable Herb Wesson Council President Los Angeles City Council 200 North Spring Street Los Angeles, CA 90012 Subject: Council File 14-1169 CEQA Transportation Thresholds - CONCERNS Dear Council President Wesson, On behalf of the Valley Industry and Commerce Association (VICA) and more than 400 businesses in the San Fernando Valley and throughout Los Angeles, we are writing to express our concerns with the city's proposal to update the methods for which transportation impact analyses are conducted pursuant to Senate Bill 743 (Steinberg, 2013). Currently, transportation impacts for projects subject to CEQA focuses on the delay that vehicles experience at intersections and on roadway segments. That delay is measured using a metric known as level of service (LOS). Any project determined to have a significant impact on LOS is required to provide mitigation measures, including the width of a roadway or size of an intersection, the lane structure to increase traffic flow, or alternative automobile traffic routes. In 2013, SB 743 was signed into law and instructed the Governor's Office of Planning and Research with the development of new guidelines to evaluate transportation impacts under CEQA. The amendments to the State CEQA Guidelines, finalized in November 2018, require all cities in California to update their transportation impact analysis metrics from LOS to vehicle miles traveled (VMT) before July 1, 2020. The approval of the proposed City of Los Angeles resolution would establish the effective date projects would be required to begin using VMT to evaluate traffic impacts. There is no planned roll-out to announce the effective date to the development community in advance. Affordable housing developers, charter schools and other applicants that have prepared a traffic study using LOS would be negatively impacted. Asking these applicants to pay for the preparation of another traffic study is detrimental to groups and organizations with limited budgets. We urge the City Council to refer this item back to the Council Transportation Committee for further consideration of a roll-out plan that provides an effective date in a reasonable amount of time, such as three months from the adoption date of the resolution. Further, the effective date should be published on the City Planning website and at the City Planning public counter. Thank you for your consideration on this issue. Sincerely, Lisa Gritzner Stuart

Waldman VICA Chair VICA President



July 29, 2019

The Honorable Herb Wesson
Council President
Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

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On behalf of the Valley Industry and Commerce Association (VICA) and more than 400 businesses in the San Fernando Valley and throughout Los Angeles, we are writing to express our concerns with the city's proposal to update the methods for which transportation impact analyses are conducted pursuant to Senate Bill 743 (Steinberg, 2013).

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Thank you for your consideration on this issue.

Sincerely,

Handwritten signature of Lisa Gritzner in black ink.

Lisa Gritzner
VICA Chair

Handwritten signature of Stuart Waldman in black ink.

Stuart Waldman
VICA President