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June 26, 2017

Councilman David Ryu
Council District 4
200 North Spring Street, Room 425
Los Angeles, CA 90012

**Subject: SOHA Recommendations on City Adoption of New Transportation Evaluation Metrics
Council File 14-1169**

- Reference 1: Letter, Seleta Reynolds (LADOT) and Vincent Bertoni (LADCP) to Los Angeles City Council, *Update on City Adoption of New Transportation Evaluation Metrics in Compliance with SB 743; CF 14-1169*, June 8, 2017.
- Reference 2: Letter, Ken Bernstein (LADCP) and Jay Kim (LADOT) to Los Angeles City Council, *Report on Specific Tasks in Anticipation of the State's Adoption of the Amended CEQA Guidelines Implementing SB 743, CF 14-1169*, January 19, 2016.
- Reference 3: John T. Walker, Ph.D., President Studio City Neighborhood Council to Christopher Calfee, Senior Counsel Governor's Office of Planning and Research, *Comments on Draft Changes to CEQA Guidelines SB 743*, September 18, 2014.
- Reference 4: Carol E. Schatz, President & CEO, Central City Association of Los Angeles, Stuart Waldman, President, Valley Industry & Commerce Association, Gary Toeppen, President & CEO, Los Angeles Area Chamber of Commerce, and William C. Allen President & CEO, Los Angeles County Economic Development Corporation to Christopher Calfee, Senior Counsel Governor's Office of Planning and Research, *Comments on the Office of Planning and Research SB 743 Draft Guidelines*, November 6, 2014.

Dear Councilman Ryu,

The Sherman Oaks Homeowners Association is very concerned that the City's imminent replacement of Level of Service (LOS) with Vehicle Miles Traveled (VMT) as the new transportation evaluation metric per SB 743 will damage quality of life in our community. LOS assesses local transportation impacts from development projects, leading to local traffic mitigation measures that reduce those impacts. VMT aligns with California's greenhouse gas emission reduction goals but assesses broader transportation impacts, leading to overall transportation system improvements with few or no local traffic mitigations. While this may be a laudable goal in areas where efficient transportation systems are already in place, we fear that immediate wholesale replacement of LOS by VMT will result in severe short-term consequences to our community. **We instead recommend a phased approach where LOS and VMT are used in parallel until the City and public fully understand the consequences and adjust methodologies as necessary.**

In their June 2017 letter to the City Council (Reference 1), Seleta Reynolds (LADOT) and Vince Bertoni (LADCP) support our recommendation by stating that “Regionally, a collection of cities and agencies are urging the Office of Planning and Research to maintain Level of Service as the transportation metric in suburban areas with less access to transit.” Yet, Reynolds and Bertoni go on to say that “... DCP and LADOT believe this approach would conflict with the [California] Office of Planning and Research’s own finding that Vehicle Miles Traveled better aligns with environmental outcomes and the State’s climate reduction policies.” **While better alignment is an obvious critical long-term goal, the immediate impact of VMT on local communities will be additional traffic and congestion because no viable alternate transportation options are currently in place.** Sherman Oaks has little access to transit with no subways, light rail, or dedicated busways within our boundaries. We have bus routes, but they travel in heavy traffic and are not realistic rapid transit. In twenty years, we may see a Sepulveda Pass subway, but LADOT and LADCP are recommending an immediate switch from LOS to VMT without considering the immediate impacts on local communities with less access to transit.

Instead, our recommended phased approach, whereby VMT and LOS are employed in parallel for transportation studies over a reasonable time period, say several years, would give the City, developers, and public an opportunity to fully understand the implications and consequences of VMT versus LOS. **Doesn’t it make sense to provide a phase-in period to ensure full understanding of replacing LOS with VMT, instead of risking severe potential unintended consequences from a major shift in the analysis of traffic impacts on local communities?**

In an earlier letter to the City Council (Reference 2), LADOT and LADCP stated that, “... a revised transportation analysis, based on VMT criteria, would generally support economic development in location-efficient areas, whereas current analysis exclusively focuses on localized congestion and does not consider location efficiency.” **SOHA feels that location efficiency is important when viable transportation options are in place. But, such options are not yet in place in Sherman Oaks and much of Los Angeles, so the immediate switch to VMT has a high potential for unintended consequences in local communities. A phase-in period with VMT and LOS used in parallel would give the City time to understand if and how VMT will work in transit-limited communities.**

SOHA’s concerns about VMT replacing LOS were supported by the Studio City Neighborhood Council in their September 2014 letter (Reference 3) – “Do not change environmental metric – Under SB 743, the focus of transportation analysis will shift from driver delays to reduction of greenhouse gas emissions, increases in transit, pedestrian and bicycle use and mix of land uses. Traffic studies based on traffic flows require developers to improve roads and intersections as mitigation for traffic impacts. This is reasonable and should continue.” We fully agree. **The City may experience increased litigation against development projects that don’t mitigate local traffic concerns because VMT masks these concerns.**

And, SOHA’s further concern about immediately switching to VMT and completely eliminating LOS was voiced by the Central City Association of Los Angeles, Valley Industry & Commerce Association, Los Angeles Area Chamber of Commerce, and Los Angeles County Economic Development Corporation in their November 2014 letter (Reference 4) – “... under SB 743, PRC Sec. 21099(b)(2) specifically mandates that no matter how much substantial evidence of automobile delay exists, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, this potential evidence of automobile delay is prohibited from being considered a significant and unavoidable impact on the environment.”

Unfortunately, when Governor Brown approved SB 743 on September 27, 2013, Section 21099(b)(2) remained and states that “Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any.”

Again, SOHA is greatly concerned about actually prohibiting LOS for transportation studies in local communities, and the impacts that this may have on your constituents.

The Sherman Oaks Homeowners Association hopes that the Los Angeles City Council will consider our concerns about immediate adoption of VMT metrics until their impacts and consequences are fully understood and proven effective.

Thank you. Please contact Bob Anderson at (213) 364-7470 or BobHillsideOrdinance@roadrunner.com for any questions or clarifications that you might have.

Respectfully,



Bob Anderson
SOHA Board Member
Chair, Transportation Committee

cc: Julia Duncan, CD4
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