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July 31, 2017

Councilmember David Ryu  
Council District 4  
Member, Council Transportation Committee  
200 North Spring Street, Room 425  
Los Angeles, CA 90012

**Subject: Follow-Up SOHA Recommendation on New Transportation Evaluation Metrics  
Council File 14-1169**

Reference 1: Letter, Bob Anderson (SOHA) To Councilman David Ryu, *SOHA Recommendations on City Adoption of New Transportation Evaluation Metrics – Council File 14-1169*, June 26, 2017

Reference 2: Audio Archive, *LA City Council Transportation Committee June 14, 2017 Meeting*

Dear Councilmember Ryu,

In Reference 1, the Sherman Oaks Homeowners Association expressed our concern that the City’s imminent replacement of Level of Service (LOS) with Vehicle Miles Traveled (VMT) as the new transportation evaluation metric from a CEQA perspective per SB 743 will damage quality of life in our community. We instead recommended 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.

SOHA continues to support our initial recommendation, but has a follow-up recommendation based on information presented by LADOT at the June 14, 2017 Transportation Committee meeting (Reference 2). LADOT plans to continue using the Level of Service (LOS) metric from a non-CEQA perspective, such as evaluating traffic performance from safety and access perspectives. However, LADOT has not yet fully explained how and when they will use the LOS metric and other traffic analysis metrics and methods.

**We recommend that the Transportation Committee require LADOT to codify their approach to using and not using VMT, LOS, and other traffic analysis metrics and methods for specific types of development projects and transportation situations, such as safety concerns.** Codifying metrics and methods usage in publicly available documentation will provide necessary transparency to the Council, developers, and the public – allowing all parties to clearly understand how each analysis metric and method will and will not be used and for what end purpose.

At the June 14, 2017 Transportation Committee meeting, David Somers of LADOT stated (Reference 2 audio at 22:19 minutes) “We [LADOT] are going to continue to evaluate impact performance of the

transportation system from a safety and access perspective. We can come back at a later time to address how we are going to approach this.” **The Transportation Committee should require LADOT to present a complete explanation of their approach to all metrics and methods usage at the next committee meeting.**

At that same June 14<sup>th</sup> Transportation Committee meeting, Saleta Reynolds of LADOT stated (Reference 2 audio at 55:57 minutes) “While we are going to be moving away from looking at Level of Service from a CEQA perspective, it is still a tool that the City, especially DOT, will have as part of its arsenal. It might still look at Level of Service when looking at, perhaps, where the driveway is best located, especially for a large project.” It appears that LADOT has not yet thought through their approach to using various traffic metrics and methods. **Understanding and codifying LADOT’s approach is critical to the Council, developers, and public. How else are we to understand LADOT’s approach to decisions that seriously impact our communities?**

SB 743 only prohibits use of the Level of Service metric from a CEQA perspective, and states that “... 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 ...” It is clear from LADOT statements that they still plan to use Level of Service and other traffic analysis metrics and methods, especially from safety and access perspectives.

Our follow-up recommendation simply requires LADOT to develop a thorough approach to metrics and methods usage, and codify this approach so the Council, developers, and public can fully understand it. This recommendation will provide necessary transparency and hopefully alleviate future confusion.

Thank you. Please contact Bob Anderson at (213) 364-7470 or [BobHillsideOrdinance@roadrunner.com](mailto:BobHillsideOrdinance@roadrunner.com) with any questions, comments, or clarifications.

Respectfully,



Bob Anderson, PE  
SOHA Board Member  
Chair, SOHA Transportation Committee

cc: Councilmember Mike Bonin, Chair, Transportation Committee  
Councilmember Paul Koretz, Vice-Chair, Transportation Committee  
Councilmember Jose Huizar, Member, Transportation Committee  
Councilmember Mitch Englander, Member, Transportation Committee  
Los Angeles City Clerk (for Council File Management System)  
Adam Lid, Transportation Committee Legislative Assistant  
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