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Sent: Tuesday, June 27, 2023 1:00 PM

To: Planning <Planning@a2gov.org>

Subject: Transportation Impact Analyses

Good afternoon,

I noted with some interest that tonight's ORC meeting will include a discussion about Traffic Impact Analysis standards in the UDC. While I believe the proposed changes are well-intentioned and would seem - on their surface - to address several issues that are important for the city's stated goals and values (and that I personally care deeply about), I nonetheless have a few concerns.

First and most foundationally, I think we need to question the entire premise of the Traffic Impact Analysis process. Many experts and practitioners have described the ITE "trip-generation" methodology as being - essentially, if not literally - "junk science". (See for example: <https://usa.streetsblog.org/2023/04/04/why-traffic-studies-are-junk-science-and-why-we-rely-on-them-anyway/>, <http://shoup.bol.ucla.edu/TruthInTransportationPlanning.pdf>, and https://www.youtube.com/watch?v=SoILf_C9IU8&t=3485s starting around minute 43:00). Not only are the prescribed trip-generation rates often based on very limited data with poor statistical significance, but the entire premise that land uses "generate" vehicular trips seems problematic given all we know about how roadway design itself can induce demand.

The newer "Multimodal" ITE methodology may seem to address some of these concerns, e.g. by attempting to measure trips for people, rather than (just) vehicles. However - while I have not read the ITE manuals themselves - from looking at some of the recent MTIAs submitted to the City of Ann Arbor, it appears that they are still foundationally based on the old and suspect vehicular trip-generation methodology, just with some scaling factors bolted onto the end of the calculation. Perhaps it could be argued this updated model still does provide some benefit over the old one, insofar as it at least considers the existence of pedestrians and bicyclists. All things being equal, this could be seen as at least incremental progress.

It seems that all things are not equal, however. I've heard "through the grapevine" that the new MTIA methodology has come at a very significantly-increased cost to developers, in some cases tripling the amount of time and effort that must be spent performing and reviewing these studies. As has been discussed before, Ann Arbor is infamously a difficult and expensive locale in which for developers to operate, a fact which tends to exclude less well-resourced developers from our community and ultimately perpetuates and exacerbates our housing crisis. While I imagine all the requirements and bureaucratic processes that contribute to this situation were established for good, well-intentioned reasons, it's worth asking ourselves whether they really are meaningfully advancing our city's goals and values, given the very real cost that they exact on the very sorts of developments that our city desperately needs in order to realize those same goals and values.

Finally, if we are to make changes here, I am concerned that the proposed UDC amendments retain any mention of Vehicular Level-of-Service at all. The A2Zero plan has set a goal for 50% reduction of Vehicle Miles Traveled in the city; if we are to achieve that goal, then measuring and mitigating VMT should be the primary focus of our transportation analyses as they pertain to vehicular trips. This is hardly unprecedented - the entire state of California has implemented such a shift: <https://opr.ca.gov/ceqa/sb->

[743/](#).

(N.B. I would prefer that the city consider VMT per-capita rather than VMT in absolute numbers. If the city were to lose all its residents and jobs, that would greatly reduce our VMT in absolute numbers - but that is also, clearly, a deeply undesirable outcome.)

As always, thanks for your attention to this issue, and for all your hard work.

- Adam