



February 14, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research (OPR)
1400 Tenth Street
Sacramento, CA 95814

Re: Comment on Preliminary Evaluation of Alternative Methods of Transportation Analysis and Potential Revisions to CEQA Guidelines

Dear Mr. Calfee,

The City of American Canyon (City) appreciates this opportunity to provide comment on the Governor's Office of Planning and Research (OPR) December 30, 2013 "Preliminary Evaluation of Alternative Methods of Transportation Analysis". The Preliminary Evaluation was developed in response to Senate Bill 743 and it is a precursor to revisions of OPR's CEQA Guidelines for Transportation/Traffic Impacts. Given the complexity of the subject, the City requests additional time to provide comments on this Preliminary Evaluation and we further request additional opportunity to comment on subsequent drafts of the revised CEQA Guidelines. In addition, OPR has received letters from the Institute of Transportation Engineers (ITE), the League of California Cities, and the City of Santa Monica, and the City incorporates their comments and concerns into our letter by reference. The City highly recommends OPR to engage the expertise of practicing transportation professionals (such as the ITE, Caltrans and FHWA) in order to develop a more comprehensive understanding of the terminology and the tools used in analyzing measure of effectiveness (MOE) ¹ before developing subsequent iterations of the revised CEQA Guidelines in order to avoid conflict and confusion with other existing state law and funding programs.

**REVISED CEQA GUIDELINES MUST BE CONSISTENT WITH THE
LEGISLATIVE INTENT OF SB 743**

The City requests that OPR limit any revisions to the Guidelines to cover only those projects located in Transit Priority Areas (TPAs) and we oppose any attempt to prohibit the use of "Level of Service" (LOS) (and/or other measures of vehicular capacity or traffic congestion) for projects outside of TPAs. While we strongly support CEQA guidelines that result in a comprehensive and balanced analysis of transportation impacts for all projects subject to CEQA review, we believe that LOS (and similar vehicular capacity measures) remain an important tool for assessing transportation impacts in rural areas such as American Canyon and Napa County that are not well-served by transit or other multi-modal forms of transportation. Such measures of vehicular capacity should be part of an overall analysis of the multi-modal transportation system that

¹ Traffic Analysis Toolbox Volume VI: Definition, Interpretation, and Calculation of Traffic Analysis Tools Measures of Effectiveness¹, Dowling, Richard. 2007. FHWA-HOP-08-054.



considers primary transportation objectives such as safety, travel time reliability, expansion or improvement in mode choice and multi-modal accessibility and mobility, and travel time improvements for all modes of travel. We believe limiting the revisions to projects within TPA's is more consistent with legislative intent of SB 743 which states in Sec. 5(c)(1) that "The Office of Planning and Research **may adopt guidelines** pursuant to Section 21083 establishing alternative metrics to the metrics used for traffic levels of service for transportation impacts **outside transit priority areas**. The alternative metrics may include the retention of traffic levels of service, where appropriate and as determined by the office (emphasis added)". We understand this paragraph of the legislation to clearly demonstrate that outside of TPAs, LOS should not necessarily be eliminated, but that alternative metrics should be made explicitly available as an option for analysis of transportation impacts.

REVISED CEQA GUIDELINES MUST SUPPORT THE EFFICIENT USE OF LOCAL GOVERNMENT RESOURCES

The City supports OPR's goal to "seek criteria that will lead to efficient use of limited fiscal revenues, for example by reducing long run infrastructure maintenance costs." Many infrastructure costs are currently addressed by local municipalities through the CEQA process. Agencies need to be able to evaluate new projects to determine their impacts on the local environment. One primary reason is to assure new projects provide adequate capital improvements to minimize and/or mitigate their impact on the environment. LOS impacts identified as part of the traffic impact analyses conducted during CEQA analysis process are extremely useful tools to identify localized impacts and improvements – such as added left-turn signals, widened sidewalks, and upgraded signal detection systems. These include direct impacts and mitigation measures, such as new traffic signals and new signal detection systems. Other localized infrastructure improvements that can be addressed through the CEQA process include traffic signal modifications, signing and marking improvements, and traffic signal synchronization/interconnection programs.

REVISED CEQA GUIDELINES MUST NOT ENCOURAGE URBAN SPRAWL AND MUST CONSIDER THE NEED OF ALL USERS

Locally, the City has implemented growth management programs that link LOS to CEQA thresholds of significance. This program, in combination with other county-wide strategies, such as setting urban growth boundaries, have been highly effective in curtailing urban sprawl and encouraging sustainable communities. Application of LOS outside of TPAs, and continued use of LOS as a threshold of significance in CEQA should therefore continue to be allowable under the revised Guidelines. It is entirely appropriate to continue to use LOS as a level of significance to assess the transportation impacts of a project that directly affects transportation facilities, such as a signalized arterial, or a freeway located outside of a TPA. In this case, LOS and other measures of delay correlate directly with auto emissions – reduced LOS means lower speeds, more idling, and more emissions. Prohibiting the use of LOS in CEQA analysis will hamper the City's attempts to mitigate environmental impacts and could inadvertently encourage urban sprawl. From a technical perspective, the use of Vehicle Miles Traveled (VMT) is an inherently flawed and not accurate metric to evaluate impacts of new development in small urban areas located in rural counties such as American Canyon and Napa County. State Route 29 (SR29)

bisects American Canyon and it is a major regional facility serving over 50,000 Bay Area commuters and commercial trucks each day who are traveling large distances, and thus, the baseline VMT is very high compared with any new potential development project VMT. Using VMT as an alternative metric will not account for the operational impacts of new development, typically localized around the immediate project area. LOS analyses must be accounted for so that the project is appropriately designed and/or mitigated – providing wide sidewalks to accommodate many transit riders, a designated pick-up/drop-off area for vehicles arriving from outside of the district, etc. The Guidelines should include detail or examples as to what would constitute a decrease in the performance or safety of public transit, bicycle, or pedestrian facilities. Moreover, the Guidelines should include impacts to commercial movement of goods as per the Complete Streets Act of 2008.

In conclusion the City opposes any attempts to prohibit the use of LOS during CEQA analysis of projects located outside TPA's and we respectfully request the opportunity to provide feedback of future revision of the CEQA Guidelines.

Respectfully,



Jason B. Holley, PE
Public Works Director

