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

RE: Updating Transportation Impacts Analysis in the CEQA Guidelines

Mr. Calfee:

Thank you for the opportunity to comment on the August 6, 2014 "*Updating Transportation Impacts Analysis in CEQA Guidelines: Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*". We appreciate the chance to provide input as this legislation moves forward.

The City of Napa understands the importance of greenhouse gas reduction and the development of multimodal transportation networks and supports these statewide goals. However, we do not support the elimination of vehicle Level of Service (LOS) as a measure of transportation impact under the California Environmental Quality Act (CEQA). LOS is an important tool that has shown to be successful in assessing transportation impacts and facilitating greenhouse gas reductions.

The following shows how LOS used as a measure of transportation impact under CEQA is currently supporting a reduction of greenhouse gas emissions and encouraging a multimodal transportation system:

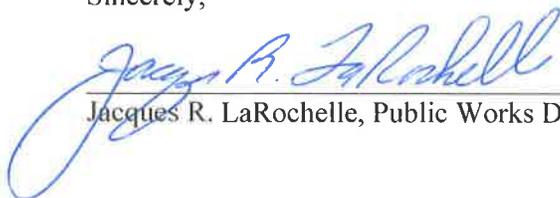
- Growth management programs that link LOS to thresholds of significance under CEQA currently used in combination with urban growth boundaries have been effective in inhibiting urban sprawl and supporting sustainable communities. Compact development facilitates multimodal transportation networks and a reduction in greenhouse gas emissions.
- LOS is used to measure more than just individual intersections; it is also used to measure large scale transportation network operations of roadway corridors. When analyzing LOS of roadway corridors, LOS directly correlates with vehicular emissions. Lower LOS translates to lower vehicular speeds, more idling, and higher levels of emissions.
- From an operational standpoint, LOS analysis of transportation impacts in CEQA is vital to ensuring an overall effective transportation network. Municipalities utilize traffic impact analysis conducted as part of CEQA to identify localized transportation impacts of projects and needed improvements. Transportation mitigations help municipalities with the cost of infrastructure maintenance by ensuring that new projects provide adequate capital improvements to minimize their impact on the environment. These mitigations are not automobile specific and they help to develop multimodal networks and reduce emissions. Examples of common transportation mitigation measures include the construction of sidewalks, bicycle lanes and transit stop improvements, as well as the synchronization of traffic signals through roadway corridors.

In response to the use of Vehicle Miles Traveled (VMT) as the measure to analyze transportation impacts under CEQA, we have the following comments:

- Vehicle Miles Traveled does not take into consideration existing trip or project trip distribution, thus it does not account for operational impacts of new development on the transportation network. This will put the full financial burden of providing operational upgrades caused by new development on the local jurisdiction.
- The use of a regional average VMT as a significance threshold does not take into consideration the vast density differences that can be present in a single region. Many regions contain dense urban areas as well as suburban and rural areas. Based on their density, rural areas naturally lend themselves to a higher Vehicle Miles Traveled rate than urban areas. The use of a regional average VMT significance threshold for project-level CEQA analysis may unjustly skew conclusions on project impacts for jurisdictions that are located in rural/outlying Metropolitan Planning Organization (MPO) areas. Jurisdictions should be allowed to select and/or develop their own sources of VMT data for use in CEQA review. This is particularly relevant when considering the implications that VMT analysis would have on communities with agriculturally-based or tourist-based economies that are reliant on uses that by their nature generate longer range vehicle trips.
- Calculating Vehicle Miles Traveled for a development requires the use of an advanced model. Many municipalities do not have such models currently established, thus resulting in additional upfront costs and continued maintenance costs. Additionally, the accuracy of these metrics is only as reliable as the model itself. In order to increase reliability of data and decrease financial burdens to local jurisdictions consideration should be given to providing Federal and State funding assistance to CMA's to develop and maintain a local VMT traffic model that can be used by jurisdictions and consulting traffic engineers for 15064.3 CEQA analysis.
- The proposed shift from a capacity-based LOS analysis to a miles-traveled-based VMT analysis may put a greater CEQA burden on road widening projects. Consideration should be given to whether 15064.3 will be a deterrent to such projects, which in turn could be counterproductive to meeting Complete Streets Act objectives of providing a balanced multi-modal transportation network. Additionally, road widening projects being carried out by a public agency independent of a private development project should be exempt from project-level 15064.3 CEQA review if the road widening project is identified in an adopted Circulation Element that has undergone program level CEQA review.
- Consideration should be given to the timing and financial burden it will put on local jurisdictions to reanalyze their individual General Plan Circulation Elements under program level CEQA review to be in compliance with a Vehicle Miles Traveled significance threshold for the transportation analysis section of CEQA.

Again, thank you for the opportunity to provide comments on the August 6, 2014 "Updating Transportation Impacts Analysis in the CEQA Guidelines: Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743".

Sincerely,



Jacques R. LaRochelle, Public Works Director