



**PUBLIC WORKS DEPARTMENT**  
1600 First Street  
Mailing Address:  
P.O. Box 660  
Napa, California 94559-0660  
Phone: (707) 257-9520  
Fax: (707) 257-9522  
*California Relay Service (CRS) Dial 7-1-1*

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

**RE: Preliminary Evaluation of Alternative Methods of Transportation Analysis**

Mr. Calfee:

Thank you for the opportunity to comment on the December 30, 2013 "Preliminary Evaluation of Alternative Methods of Transportation Analysis". 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 and bicycle lanes, as well as the synchronization of traffic signals through roadway corridors.

In response to the preliminary evaluation of the alternative criteria, we have the following comments:

- Vehicle Miles Traveled, Automobile Trips Generated, and Fuel Use – These metrics do not take into consideration existing trips or project trip distribution, thus they do not account for operational impacts of new development.
- Vehicle Miles Traveled, Fuel Use, and Motor Vehicle Hours Traveled – These metrics require advanced models in order to be calculated. 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, thus they could be highly skewed.
- Multi-Modal Level of Service – This metric requires a great deal of information to calculate, making it much more complicated than vehicle LOS.
- Presumption of Less Than Significant Transportation Impact Based on Location – This metric does not take into consideration project type, which could result in unintended consequences if the type and size of a project is not consistent with its surroundings.

Again, thank you for the opportunity to provide comments on the December 30, 2013 “Preliminary Evaluation of Alternative Methods of Transportation Analysis”.

Sincerely,



Lorien E. Clark  
Transportation Planner  
City of Napa – Public Works Department  
[leclark@cityofnapa.org](mailto:leclark@cityofnapa.org)  
707-257-9398