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November 19, 2014

Mr. Christopher Calfee
Senior Counsel
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95814

RE: Updating Transportation Impacts Analysis in the CEQA Guidelines
Preliminary Discussion Draft of Updates to the CEQA Guidelines
Implementing Senate Bill (SB) 743

Dear Mr. Christopher Calfee:

The Napa County Transportation & Planning Agency (NCTPA) appreciates the opportunity to comment on the guidelines for the implementation of SB 743. While NCTPA accolades the efforts to implement SB 375 and reduce GHG emissions at such a large scale we would like to provide some comments on the proposed guidelines.

On the subject of land use projects and vehicle miles traveled (VMT), while creating a regional average VMT level of impact determination may expedite an element of the CEQA analysis, regions are too diverse to have a single VMT threshold. To illustrate the extensive variety within one (1) single region, consider the city of San Francisco, a city with over 800,000 inhabitants and 2,138 lane miles, compared to the town of Yountville, a town with just under 3,000 residents and 17 lane miles. Both jurisdictions are within the Metropolitan Transportation Commission (MTC) region, but substantially different in geography, infrastructure and population. A sub-regional, VMT threshold would be more appropriate for suburban localities without robust transportation infrastructures.

The elimination of the LOS metric and vehicle delay as a finding of environmental impact under CEQA in the impact analysis of a development project may have inadvertent consequences on the on-time performance of transit vehicles with routes in the area potentially undermining the original purpose. It is well-known that slower traffic speeds emit higher levels of CO₂ as outlined by Barth and Boriboonsomsin (2009) in "Traffic Congestion and Greenhouse Gases."

Appendix F identifies two (2) types of models for estimating VMT, sketch and travel demand, used to determine the amount of VMT resulting from a project. The complexity and type of model influence VMT, thus more direction is needed as to which model should be used. Ultimately, the dependability of the data generated by a model is only as reliable as the source utilized to collect the data.

We would like to reiterate there is a vast range of communities and ask you to consider the complex diversity of each region. Also, examine the possibility of a phased implementation of the guidelines by region and establishing a sub-regional VMT threshold methodology that can be implemented in phases over a period of time.

Thank you for your consideration. We look forward to the opportunity to contribute to further iterations of these draft guidelines.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kate Miller', written over the word 'Sincerely'.

Kate Miller
Executive Director

cc: NCTPA Technical Advisory Committee