

CEQA TRANSPORTATION ANALYSIS UPDATE FREQUENTLY ASKED QUESTIONS – August 2019

SUMMARY

In 2013, the State of California signed Senate Bill (SB) 743 into law, which requires a shift in the way cities measure environmental impacts. The Los Angeles Departments of City Planning (DCP) and Transportation (LADOT) updated the City's California Environmental Quality Act (CEQA) Transportation Thresholds to comply with and implement SB 743. LADOT also revised its Transportation Assessment Guidelines for evaluating project-level transportation review outside of the requirements under CEQA.

BACKGROUND

On July 30, 2019, the Los Angeles City Council unanimously voted to update the City of Los Angeles CEQA Transportation Thresholds to comply with SB 743 and implement the policies of the Mobility Plan 2035 and LA's Green New Deal.

FREQUENTLY ASKED QUESTIONS

How is Vehicle Miles Traveled (VMT) measured?

VMT captures the automobile trips generated by a proposed development, multiplied by the estimated number of miles driven for each trip. This figure is divided by the number of residents (VMT per capita) or employees (VMT per employee). Typically, development located farther from key destinations, such as job centers or transit, may result in longer distance driving. Development located closer to job centers and transit may result in lower VMT due to shorter driving distances.

Which projects will have to measure transportation-related impacts under CEQA? Any discretionary land use project that is estimated to surpass the screening criteria, is required to analyze environmental impacts related to transportation.

How will a land use project's transportation impacts be measured under CEQA?

If a development project exceeds the screening criteria, the applicant must evaluate the VMT impact of a proposed project. The VMT Calculator, a spreadsheet-based tool available for download on LADOT's website, is one method of conducting this analysis. To initiate a VMT analysis using the VMT Calculator, input the project's address, land use mix, and intensity. The tool then assigns trip generation and travel characteristics, derived from



VMT Calculator

local travel data, to estimate the VMT (per capita or per employee) generated by people



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traveling to and from the project site. If the project's VMT exceeds the significant impact criteria threshold for the project area, the new tool offers a menu of mitigation measures to select from that have been proven to reduce VMT.

What are the CEQA impact criteria thresholds for land use projects?

The land use project threshold compares the estimated VMT of a project to the average VMT per capita observed within the boundaries of their respective Area Planning Commission (APC). A project must perform at least 15% below the average of the APC area, per capita and per employee. The APC area boundaries represent a land area equivalent to a medium-size California city and captures consistent travel behavior zones and geographies in the City of Los Angeles. The map displays APC boundaries and table summarizes the thresholds.



Area Planning Commission boundary map

Recommended Threshold by Area Planning Commission		
Area Planning Commission	VMT per capita	VMT per employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

How can a project with a significant transportation impact mitigate VMT impacts?

If a proposed project exceeds the significant impact criteria threshold for the APC in which it is located, a menu of mitigation measure options is available within the VMT Calculator. Mitigation measures were selected for inclusion based on available evidence of demonstrated ability to reduce VMT. Examples of measures include transit incentives,



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education and marketing, commute trip reductions, parking management, improved neighborhood connectivity, and shared mobility options.

How does this affect projects that have initiated their transportation analysis process and/or are going through the entitlement process?

As previously described during the project open houses and public hearings and at City Planning Commission on February 28, 2019, upon adoption by City Council the updated transportation thresholds became effective and a transition period started. During this transition, projects that already have a signed memorandum of understanding (MOU) with LADOT and have filed an application with DCP may continue analyzing transportation impacts with level of service (LOS), as long as the project will be adopted and through any appeal period prior to the State deadline of July 1, 2020. It is strongly recommended that these projects analyze transportation impacts with VMT, or at a minimum complete a parallel review process with both LOS and VMT, in the case that they are not able to complete approval prior to the State deadline. All land use development projects must measure transportation-related CEQA impacts with VMT starting on July 1, 2020, as required by state legislation.

Will projects that do not have transportation impacts be required to make improvements?

Projects that have impacts in other CEQA categories outside of transportation will have to mitigate impacts in each respective category. The updated City of Los Angeles Transportation Assessment Guidelines may also include requirements for projects that propose physical street modifications or introduce new travel demand. Projects will be required to assess potential effects on pedestrian, bicycle, and transit facilities in the project vicinity, in addition to the review required under CEQA. A delay-based analysis may be needed to evaluate if the project would contribute to potential circulation and access deficiencies that require specific operational improvements to the circulation system. Proposed projects may be required to upgrade pedestrian crossings, install safety countermeasures, or optimize traffic signal performance if the project would foreseeably affect the performance of existing facilities.

Will level of service (LOS) still be measured?

LADOT may require proposed projects to evaluate scenarios outside of CEQA through vehicle LOS to identify circulation and access deficiencies that may require specific operational improvements. CEQA analysis for other subject areas, such as air quality analysis, may also continue to rely on vehicle LOS analysis to inform emissions modeling.

Does my ability to engage in land use and transportation decisions change?

No. The City's planning process will continue to allow and encourage community members to weigh in on land use changes and transportation projects through existing venues and



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methods, including opportunities to provide comments, speak at public hearings, and contact elected representatives on proposed new development.

What other cities have updated their CEQA evaluation process to include vehicle miles traveled (VMT) as a transportation performance metric?

Upon adoption on July 30, 2019, Los Angeles became the fifth city in California to align procedures with State law, along with Pasadena, San Francisco, San Jose, and Oakland. All California cities must update the way transportation impacts are analyzed under CEQA before the deadline of July 1, 2020.

Where can I learn more?

Additional resources are available on the <u>DCP</u> and <u>LADOT</u> project websites.

Who can I contact for more information?

Questions can be directed to ladot.vmt@lacity.org