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Updating Transportation Impacts Analysis in the CEQA Guidelines	
Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (Steinberg, 2013)	
Governor's Office of Planning and Research	
8/6/2014	
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Senate Bill 743 (Steinberg, 2013)	
Excerpt of Public Resources Code § 21099	
<p>(b) (1) The Office of Planning and Research shall prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the guidelines adopted pursuant to Section 21083 establishing criteria for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. In developing the criteria, the office shall recommend potential metrics to measure transportation impacts that may include, but are not limited to, vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. The office may also establish criteria for models used to analyze transportation impacts to ensure the models are accurate, reliable, and consistent with the intent of this section.</p>	<p>We believe that OPR should establish a standard for measuring these metrics and develop criteria of acceptance for gathering and sharing this data.</p>
<p>(2) Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any.</p>	<p>We believe that OPR should review level of service and other proven transportation models to determine if any exceptions should be made. Development of a VMT model may be difficult for some developers to obtain as current VMT models review data at a regional level and cannot be easily extrapolated for local streets.</p>
<p>(3) This subdivision does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation.</p>	<p>The guidelines should state that these elements are covered under another section.</p>

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<p>The methodology established by these guidelines shall not create a presumption that a project will not result in significant impacts related to air quality, noise, safety, or any other impact associated with transportation. Notwithstanding the foregoing, the adequacy of parking for a project shall not support a finding of significance pursuant to this section.</p>	
<p>(4) This subdivision does not preclude the application of local general plan policies, zoning codes, conditions of approval, thresholds, or any other planning requirements pursuant to the police power or any other authority.</p>	<p>The guidelines should state that by level of service or similar measures of vehicular capacity or traffic congestion may/may not be included under local authority. This is necessary to eliminate potential conflict with projects which may have significant impact to local streets, but alone does not impact the regional VMT etc. An example of a project which would not impact a regional VMT (20 Million VMTs) may be a private school. An increase of 500 new students to a local community will have significant impact to the parking, congestion, and accessibility to the school. However, under a regional VMT model, this type of proposal would not be considered significant less than 1% increase in VMT. Clarity should be added to the reference to “local general plan...” to specifically include local policies and guidelines as the current reference to “local general plan policies” is vague.</p>
<p>(5) On or before July 1, 2014, the Office of Planning and Research shall circulate a draft revision prepared pursuant to paragraph (1).</p>	
<p>(c) (1) 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.</p>	<p>“Alternative” suggests that these metrics are to be used as alternatives to Level of Service calculations. VMT is not an alternative to LOS. VMT attempts to predict the number of miles traveled to certain destinations...this assists the transportation planner in developing plans for new freeways, major arterials and possibly collector streets. LOS looks at the movement of vehicles and how long they need to stay at a particular intersection to determine the performance of the intersection.</p>

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	There are other measures in a traffic analysis which include Volume to Capacity Ratios and Queue lengths. These are elements that can be measured in the field and are specific to the project.
(2) This subdivision shall not affect the standard of review that would apply to the new guidelines adopted pursuant to this section.	
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Analyzing Transportation Impacts	
<p>Traffic studies used in CEQA documents have typically focused on one thing: the impact of projects on traffic flows. By focusing solely on delay, environmental studies typically required projects to build bigger roads and intersections as mitigation for traffic impacts. That analysis tells only part of the story, however.</p>	<p>This is not entirely true. Each location establishes guidelines and thresholds for significance. It is just a difficult for a pedestrian to cross a heavily congested street as it is to cross a multilane roadway. Both types of situations require different traffic control devices to allow safe passage for the pedestrian. It would make more sense to identify these in the CEQA checklist than to limit the analysis to one metric or another.</p> <p>One reason why traffic is a hot topic at public meetings is that it is something that the community experiences together. Whether they walk, ride the bike, ride a bus, or drive, they all have something to contribute to the conversation about traffic.</p>
<p>Impacts on pedestrians, bicyclists and transit, for example, have not typically been considered. Projects to improve conditions for pedestrians, bicyclist and transit have, in fact, been discouraged because of impacts related to congestion. Requiring mitigation for such impacts in the CEQA process imposes increasing financial burdens, not just on project developers that may contribute capital costs for bigger roadways, but also on taxpayers that must pay for maintenance and upkeep of those larger roads. Ironically, even congestion relief projects (i.e., bigger roadways) may only help traffic flow in the short term. In the long term, they attract more and more drivers (i.e., induced demand), leading not only to increased air pollution and greenhouse gas emissions, but also to a return to congested conditions. (Matute and Pincetl, Use of Performance Measures that Prioritize Automobiles over</p>	<p>Again, the local agency has within its authority to require these elements to be included.</p> <p>This document could be used to identify how this data can be collected and used in a traffic impact analysis so that the decision makers (laymen and women) can review traffic impact reports in a consistent manner that is meaningful and useful.</p> <p>Local agencies do not have the resources to install major traffic control devices in response to every new development. Developers complain that they must bear the burden of existing land use elements.</p>

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<p>Other Modes in Congested Areas; the Handy and Boarnet, the DRAFT Policy Brief on Highway Capacity and Induced Travel, (April 2014).) Under current practice, none of these impacts are considered in a typical project-level environmental review.</p>	
<p>Such impacts have not completely escaped notice, however. For many years, local governments, transportation planners, environmental advocates and others have encouraged the Governor’s Office of Planning and Research (OPR) to revise the CEQA Guidelines to reframe the analysis of transportation impacts away from capacity. In 2009, the Natural Resources Agency revised the Appendix G checklist to focus more on multimodal, the complete streets concepts. (Natural Resources Agency, Final Statement of Reasons: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97 (December 2009).)</p>	<p>Comment only... Existing traffic modeling programs have the capability to model gas emission as well as LOS, V/C ratios, Queue lengths, etc.</p>
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<p>Just last year, the Legislature passed, and Governor Brown signed into law, Senate Bill 743 (Steinberg, 2013), which requires OPR to develop alternative methods of measuring transportation impacts under CEQA. At a minimum, the new methods must apply within areas that are served by transit; however, OPR may extend the new methods statewide. Once the new transportation guidelines are adopted, automobile delay will no longer be considered to be an environmental impact under CEQA. SB 743 requires OPR to circulate a first draft of the new guidelines by July 1, 2014. The preliminary discussion draft below satisfies that requirement.</p>	<p>Comment only We do not recommend that these guidelines be extended statewide. If the goal is to reduce VMTs then only those areas being served by transit systems will benefit. Rural areas will have a disadvantage in using VMTs as they will likely produce higher VMTs than the urban areas but they have fewer transit resources.</p>
<p>. This proposal involves changes to the CEQA Guidelines. Because the CEQA Guidelines apply to all public agencies, and all projects, throughout the state, they generally must be drafted broadly. Similarly, this proposal reflects CEQA’s typical deference to lead agencies on issues related to methodology. The background paper accompanying this proposal, however, provides additional detail on a sample methodology for conducting an analysis, lists models capable of estimating vehicle miles traveled, and ideas for mitigation and alternatives. We invite reviewers to let us know if greater or less detail</p>	<p>The proposed methodologies are appropriate for use at a regional/MPO level. However, we do not believe these methods will be adequate to determine significant impact if used alone without considering existing site specific conditions.</p>

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should be included in the new Guidelines.	
Explanation of Proposed New Section 15064.3	
<p>OPR proposes to add a new section 15064.3 to the CEQA Guidelines to provide new methods of measuring transportation impacts. OPR initially considered whether to put the new methods in an appendix or in a new section of the Guidelines. OPR chose the latter, because experience with Appendix F, which requires analysis of energy impacts, has shown that requirements in appendices may not be consistently applied in practice.</p>	<p>Question: New section title Determining the Significance of Transportation Impacts</p> <p>The title implies that all traffic and transportation projects should follow these guidelines.</p> <p>Is this your intent? If so, does this preclude other methods also?</p>
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Subdivision (a): Purpose	
<p>Subdivision (a) sets forth the purpose of the entire new section 15064.3. First, the subdivision clarifies that the primary consideration, in an environmental analysis, regarding transportation is the amount and distance that a project might cause people to drive. This captures two measures of transportation impacts: auto trips generated and trip distance. These factors are important in an environmental analysis for the reasons set forth in the background materials supporting vehicle miles traveled as a transportation metric. These factors were also identified by the legislature in SB 743. (Pub. Resources Code § 21099(b)(1).) Specifying that trip generation and vehicle miles traveled are the primary considerations in a transportation analysis is necessary because impacts analysis has historically focused on automobile delay.</p>	<p>While amount and distance are important variables in the development of large infrastructure projects such as freeways and expressways, they are not sufficient, if used alone, to determine the impact on a small community.</p> <p>Other factors such as existing conditions, level of service at the intersection, parking availability, may be better predictors of future outcomes.</p> <p>The focus on vehicle delay is only one metric, other metrics are also included in the final decision process. In order to develop the model that reviews automobile delay times the engineer has to start with trip generation.</p> <p>If traffic is backed up in the streets, it is an indicator that cut thru traffic patterns will emerge. If along a transit route, it may impact the performance of the transit operator.</p>
<p>The second sentence in subdivision (a) also identifies impacts to transit and the safety of other roadway users as relevant factors in an environmental analysis. Impacts to transit and facilities for pedestrians and bicyclists are relevant in an environmental impacts analysis because deterioration or interruption may cause users switch from transit or active modes to single-</p>	<p>It would be very helpful if OPR developed guidelines to measure these impacts for pedestrian and cyclists.</p> <p>NACTO has general guidelines, but it would be good to have quantitative as well as qualitative methods.</p>

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<p>occupant vehicles, thereby causing energy consumption and air pollution to increase. Further, impacts to human safety are clearly impacts under CEQA. (Pub. Resources Code § 21083(b)(3) (a significance finding is required if a project will cause substantial adverse effects on human beings, either directly or indirectly).) Finally, SB 743 requires the new guidelines to promote multimodal transportation and to provide for analysis of safety impacts. (Pub. Resources Code § 21099(b)(1), (b)(3).)</p>	<p>Quantitative methods can be measured before and after the project has been implemented.</p> <p>Qualitative methods are subjective and vary from site to site.</p>
<p>The third sentence clarifies that air quality and noise impacts related to transportation may still be relevant in a CEQA analysis. (Pub. Resources Code § 21099(b)(3) (the new guidelines do not relieve a public agency of the requirement to analyze a project’s potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation).) However, those impacts are typically analyzed in the air quality and noise sections of environmental documents. Further, there is nothing in SB 743 that requires analysis of noise or air quality in a transportation section of an environmental document. In fact, the content of any environmental document may vary provided that any required content is included in the document. (State CEQA Guidelines § 15120(a).)</p>	<p>These are typically included in a standard EIR not under transportation impacts but under other environmental impacts such as air and noise.</p>
<p>Finally, the last sentence clarifies that automobile delay is not a significant effect on the environment. This sentence is necessary to reflect the direction in SB 743 itself that vehicle delay is not a significant environmental impact. (Pub. Resources Code § 21099(b)(2) (Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described</p>	<p>It would be better to state that vehicle delay should not be the only impact. It is incorrect to state that vehicle delay is not a significant impact.</p> <p>When traffic gets congested, drivers tend to find alternative routes, they speed and cut thru neighborhoods to get to their destination. Projects which minimizes the number of available parking spaces, often time increase parking congestion on the street. This often results in turf wars between businesses and residents.</p>
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<p>solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any).) As noted above, traffic-related noise and air quality impacts, for example, may still be analyzed in CEQA and mitigated as</p>	<p>We believe the LOS metric is still a valuable impact analysis tool to be supplemented with other metrics that review other modes of travel, indices of livability, safety, etc. to look at amenities that a project can provide.</p>

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needed. Mitigation would consist of measures to reduce noise or air pollutants, however, and not necessarily the delay that some vehicles may experience in congestion.	
Subdivision (b): Criteria for Analyzing Transportation Impacts	
For example, a project that results in vehicle miles traveled that is greater than the regional average might be considered to have a significant impact. Average in this case could be measured using an efficiency metric such as per capita, per employee, etc. Travel demand models can provide information on those regional averages. Region refers to the metropolitan planning organization or regional transportation plan area within which the project is located. Notably, because the proposed text states that greater than regional average may indicate a significant impact, this subdivision would not prevent a local jurisdiction from applying a more stringent threshold. (Pub. Resources Code 21099(e) (the new Guidelines do not affect the authority of a public agency to establish or adopt thresholds of	<p>In order to adequately address this question, we would need to see the data for the regional averages for our area.</p> <p>Currently, this data covers a very broad area and we have concerns that it will not address the issues that develop at a site specific level.</p>
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significance that are more protective of the environment).) Note, this potential finding of significance would not apply to projects that are otherwise statutorily or categorically exempt.	<p>Does this mean that public agencies can continue to use their thresholds of significance as long as they also add in thresholds of significance for VMT or other alternative metrics?</p> <p>And how would one jurisdiction compare impacts if there are multiple alternative metrics and no nationally recognized standard?</p>
Why regional average? First, the region generally represents the area within which most people travel for their daily needs. Second, focusing on the region recognizes the many different contexts that exist in California. Third, pursuant to SB 375, metropolitan planning organizations throughout the state are developing sustainable communities strategies as part of their regional transportation plans, and as part of that process, they are developing data related to vehicle miles traveled. Fourth, average vehicle miles traveled per capita, per employee, etc., can be determined at the regional level from existing data. Finally, because SB 375 requires all regions to reduce region-wide greenhouse gas emissions related to transportation, projects that move the region in the other direction may warrant a closer	<p>From a CEQA permitting perspective, vehicle delay and LOS are no longer considered a significant impact on the environment. Instead, agencies must consider Vehicle Miles Traveled (VMT). VMT consists of Trip Generation and Trip Distance. We have a great tool to calculate trip generation by using the industry standard ITE manuals. However, we are not aware of the availability of tools for estimating distances of trips with the same level of accuracy for future projects. Although there are some models that can estimate VMT, their accuracy, to our knowledge, is highly questionable and has</p>

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look.	not been time tested. In addition, it is not clear how readily available these models will be to agencies?
Subdivision (b)(2): Induced Travel and Transportation Projects	
<p>While subdivision (b)(1) addresses vehicle miles traveled associated with land use projects, subdivision (b)(2) focuses on impacts that result from certain transportation projects. Specifically, research indicates that adding new traffic lanes in areas subject to congestion tends to lead to more people driving further distances. (Handy and Boarnet, "DRAFT Policy Brief on Highway Capacity and Induced Travel, (April 2014).) This is because the new roadway capacity may allow increased speeds on the roadway, which then allows people to access more distant locations in a shorter amount of time. Thus, the new roadway capacity may cause people to make trips that they would otherwise avoid because of congestion, or may make driving a more attractive mode of travel. Research also shows that extending new roadway capacity, like the addition of water or sewer infrastructure, may remove barriers to growth in undeveloped areas. Subdivision (b)(2) would therefore require lead agencies that add new physical roadway capacity in congested areas to consider these potential growth-inducing impacts.</p>	<p>We believe there needs to be a distinction made between increasing the width of an existing road for the purposes of safety improvements and the creation of a new road. Bicycle lane buffers are an example of widening that would enhance safe access for multiple users. Widening existing roads helps to keep vehicles in arterial and collector roads and out of the residential areas. Where congestion exists on collector and arterial roads, we find cut thru traffic onto local and residential roads. As the rural areas develop, new subdivisions will require new roads to service those subdivisions. Typically these are residential/local roads. Larger subdivisions may include collector roads. The impact of a subdivision may or may not impact regional VMTs but will certainly have an impact to adjacent roads by adding sidewalks, bike lanes, parking, vehicles, etc.</p>
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<p>Subdivision (b)(2) also clarifies that not all transportation projects would be expected to cause increases in vehicle miles traveled. For example, projects that are primarily designed to improve safety or operations would not typically be expected to create significant impacts. The same is true of pedestrian, bicycle and transit projects, including those that require reallocation or removal of motor vehicle lanes.</p>	
<p>Subdivision (b)(3): Local Safety Subdivision (b)(3) recognizes that vehicle miles traveled may not be the only impacts associated with transportation. While vehicle miles traveled may reflect regional concerns, transportation impacts may also be felt on a local level. The convenience of drivers and the layout of local roadway systems are issues that can, and likely will continue</p>	<p>Please expand on this as it is unclear which items are required for a finding of significant impact. In the CEQA checklist under Transportation, will LOS, V/C, Congestion, VMT, Pedestrian/Bicycle Improvements all be included?</p>

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to be, addressed in local planning processes. Safety impacts, as noted above, are local impacts that are appropriate in a CEQA analysis.	
Specifically, subdivision (b)(3) clarifies that lead agencies should consider whether a project may cause substantially unsafe conditions for various roadway users. The potential safety concern must be one that affects many people, not just an individual. Further, the potential safety concern must relate to actual project conditions, and not stem solely from subjective fears of an individual. Subdivision (b)(3) includes a non-exclusive list of potential factors that might affect the safety of different roadway users.	Will the CEQA checklist include elements to determine ped/bicycle safety, vehicular safety, lighting, signage, other elements?
Subdivision (b)(4): Methodology	
Subdivision (b)(4) provides guidance on methodology. First, it clarifies that analysis of a project’s vehicle miles traveled is subject to the rule of reason. In other words, a lead agency would not be expected to trace every possible trip associated with a project down to the last mile. Conversely, to the extent that available models and tools allow, a lead agency would be expected to consider vehicle miles traveled that extend beyond the lead agency’s political boundaries. (See, e.g., State CEQA Guidelines § 15151 (An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible).) This clarification is needed because under current practice, some lead agencies do not consider the transportation impacts of their own projects that may be felt within adjacent jurisdictions.	A local agency will not have the tools to do a regional analysis of VMTs, this will need to come from a regional agency/MPO as much of this data is collected by these methods: http://www.fhwa.dot.gov/environment/climate_change/mitigation/publications_and_tools/ghg_handbook/chapter05.cfm
Subdivision (b)(4) also recognizes the role for both models and professional judgment in estimating vehicle miles traveled. Many publicly available models are available that can estimate the amount of vehicle miles traveled associated with a project. Models, however, are only tools. A model relies on certain assumptions and its use may, or may not, be appropriate given a particular project and its context. For similar reasons, model outputs may need to be revised. Thus, subdivision (b)(4) expressly recognizes the role of professional judgment in using models. Notably, this is consistent with general CEQA rules in determining significance. (See, e.g., State CEQA Guidelines § 15064(b) (determining significance § calls for careful judgment on the part of the public agency involved, based to the extent possible on	We believe that a regional model with factors to be applied for different types of area developed by the MPO with support from local agencies will promote transparency and consistent results. We agree that the use of the data should be determined by the local agency but the base data should be consistent in a region.

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<p>scientific and factual data.) To promote transparency, subdivision (b)(4) requires that any adjustments to model inputs or outputs be documented and explained. Further, this documentation should be made plain in the environmental document itself.</p>	
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<p>Subdivision (c): Mitigation and Alternatives</p>	
<p>Subdivision (c) restates the general rule that when a lead agency identifies a significant impact, it must consider mitigation measures that would reduce that impact. The selection of particular mitigation measures, however, is always left to the discretion of the lead agency. Further, OPR expects that agencies will continue to innovate and find new ways to reduce vehicular travel. Therefore, OPR proposes to identify several potential mitigation measures and alternatives in existing Appendix F (regarding energy impacts analysis), and include a cross-reference to Appendix F in subdivision (c). Subdivision (c) also makes explicit that this section does not limit any public agency's ability to condition a project pursuant to other laws. For example, while automobile delay will not be treated as a significant impact under CEQA, cities and counties may still require projects to achieve levels of service designated in general plans or zoning codes. (Pub. Resources Code § 21099(b)(4) (This subdivision [requiring a new transportation metric under CEQA] does not preclude the application of local general plan policies, zoning codes, conditions of approval, thresholds, or any other planning requirements pursuant to the police power or any other authority).) Similarly, with regard to projects that have already undergone environmental review, subdivision (c) clarifies that nothing in these proposed rules would prevent a lead agency from enforcing previously adopted mitigation measures. In fact, within the bounds of other laws, including adopted general plans, lead agencies have discretion to apply or modify previously adopted mitigation measures. (Napa Citizens for Honest Government v. Napa County Bd. of Sup. (2001) 91 Cal. App. 4th 342, 358 (because mistakes can be made and must be rectified, and §c the vision of a region's citizens or its governing body may evolve over time there are times when mitigation measures, once adopted, can be deleted).) Notably,</p>	<p>This language needs to be very clear as consultants and developers may insist that they do not need to use delay and congestion type models in their methodology.</p> <p>The language needs to explicitly state that delay and/congestion modeling may be used as long as it is used in conjunction with VMT type modeling, etc.</p> <p>To say that LOS is not a significant impact under CEQA leaves the door open for developers to state that their project, even if it causes significant delays, is not required to provide mitigation measures to lessen these impacts. We believe the intent of this legislation was to ensure that other factors are considered in making a finding.</p>

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deletion of measures imposed solely to address automobile delay should not require any additional environmental review because section 21099 of the Public Resources Code states that automobile delay is not a significant impact under CEQA.	
Subdivision (d): Applicability	
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The third sentence allows jurisdictions to opt-in to these new procedures, regardless of location, provided that they update their own CEQA procedures to reflect the rules in this section. (See State CEQA Guidelines § 15022.) This is intended to provide certainty to project applicants and the public regarding which rules will govern project applications. Notably, a lead agency's adoption of updates to its own CEQA procedures will not normally be considered a project that requires its own environmental review. (See California Building Industry Assn. v. Bay Area Air Quality Management Dist. (2014) 218 Cal. App. 4th 1171, 1183-1192 (certiorari granted on other grounds).)	CEQA is a state wide document. We have other policies but they are not called CEQA or even local CEQA. We believe the term is local planning policies, ordinances, resolutions, etc.
Explanation of Amendments to Appendix G: Transportation	
OPR proposes several changes to the questions related to transportation in Appendix G to conform to the proposed new Section 15064.3. First, OPR proposes to revise the question related to "measures of effectiveness" so that the focus is more on the circulation element and other plans governing transportation. Second, OPR proposes to revise the question that currently refers to "level of service" to focus instead on a project's vehicle miles traveled. Third, OPR proposes to recast the question related to design features so that it focuses instead on whether a roadway project would tend to induce additional travel. Fourth, OPR proposes to revise the question related to safety to address the factors described in subdivision (b)(3) of the proposed new Section 15064.3.	LOS is one of many metrics used to determine, congestion, performance. LOS alone does not measure safety or cut thru traffic. But it is a good indication that if an intersection is congested, that cut thru traffic is a possible outcome. VMTs look at things from a global perspective, at a local level this type of analysis will need local data to minimize error during extrapolation and interpolation.
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(a) Purpose.	
When analyzing a project's potential environmental impacts related to transportation, primary considerations include the amount and distance of automobile travel associated with the project. Other relevant considerations	A project's effect on automobile delay alone does not constitute a significant environmental impact. Automobile delay may be used if other factors such as VMT, air emissions, etc also pose a

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<p>include the effects of the project on transit and non-motorized travel and the safety of all travelers. Indirect effects of project-related transportation, such as impacts to air quality and noise, may also be relevant, but may be analyzed together with stationary sources in other portions of the environmental document. A project's effect on automobile delay does not constitute a significant environmental impact.</p>	<p>significant environmental impact.</p>
<p>(b) Criteria for Analyzing Transportation Impacts.</p>	
<p>(1) Vehicle Miles Traveled and Land Use Projects. Generally, transportation impacts of a project can be best measured using vehicle miles traveled. A development project that is not exempt and that results in vehicle miles traveled greater than regional average for the land use type (e.g. residential, employment, commercial) may indicate a significant impact. For the purposes of this subdivision, regional average should be measured per capita, per employee, per trip, per person-trip or other appropriate measure. Also for the purposes of this subdivision, region refers to the metropolitan planning organization or regional transportation planning agency within which the project is located. Development projects that locate within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor generally may be considered to have a less than significant transportation impact. Similarly, development projects, that result in net decreases in vehicle miles traveled, compared to existing conditions, may be considered to have a less than significant transportation impact. Land use plans that are either consistent with a sustainable communities strategy, or that achieve at least an equivalent reduction in vehicle miles traveled as projected to result from implementation of a sustainable communities strategy, generally may be considered to have a less than significant impact.</p>	<p>There is a difference between transportation impact and traffic impacts. The former is on an area wide level, while the latter is at a local level.</p> <p>There should be a distinction made. For example the introduction of a new school may not have any impact to nearby freeways and roadways, but the impact to the neighborhood could include parking, speeding, traffic congestion, noise, air pollution, pedestrian crossing, litter etc.</p> <p>VMT methods alone will not identify these potential impacts.</p>
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<p>(3) Local Safety. In addition to a project's effect on vehicle miles traveled, a lead agency may also consider localized effects of project-related transportation on safety. Examples of objective factors that may be relevant may include:</p>	<p>If possible these examples could include a discussion on how they would contribute to or reduce VMT on a specific project.</p>
<p>(c) Alternatives and Mitigation.</p>	

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Examples of mitigation measures and alternatives that may reduce vehicle miles travelled are included in Appendix F. Neither this section nor Appendix F limits the exercise of any public agency’s discretion provided by other laws, including, but not limited to, the authority of cities and counties to condition project approvals pursuant to general plans and zoning codes. Previously adopted	It needs to be clear that the local jurisdiction may continue to impose traffic/transportation thresholds based on delay, congestion, V/C etc. but they must also include elements which consider emissions, pedestrian/bicycle safety, etc.
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measures to mitigate congestion impacts may continue to be enforced, or modified, at the discretion of the lead agency.	
(d) Applicability.	
The provisions of this section shall apply prospectively as described in section 15007. Upon filing of this section with the Secretary of State, this section shall apply to the analysis of projects located within one-half mile of major transit stops or high quality transit corridors. Outside of those areas, a lead agency may elect to be governed by the provisions of this section provided that it updates its own procedures pursuant to section 15022 to conform to the provisions of this section. After January 1, 2016, the provisions of this section shall apply statewide.	“After January 1, 2016” This date should be amended if possible to allow more time to develop this methodology and confirm that there are no unintended consequences with this ruling.
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Text of Proposed Amendments to Appendix F	This should be include under Air Quality, not Transportation impacts. Most of these elements do not change the VMT, but are necessary for air pollution or energy conservation measures.
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c. Incorporating affordable housing into the project.	Persons with low income need cars to get to work. They may have more than one car because they live in Modesto but have a job in San Mateo and their spouse have a job in Sacramento, etc.
e. Incorporating neighborhood electric vehicle network.	While electric vehicles may reduce air pollution, how does an electric vehicle reduce VMTs? They still use the roadway.
j. Limiting parking supply.	Causes spill over parking to other streets.
k. Unbundling parking costs.	Causes spill over parking to other streets for residents who cannot afford the parking space.
l. Parking or roadway pricing or cash-out programs.	Causes spill over parking to other streets for residents who cannot

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	afford the parking space.
1. Locating the project in an area of the region that already exhibits below average vehicle miles traveled.	Provides incentives for urban development at the expense of rural areas.
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6. Deploying management (e.g. pricing, vehicle occupancy requirements) on roadways or roadway lanes.	Not practical for local streets. Hard for developers to implement on their own. Only MPOs can coordinate this type of project.
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XVI. TRANSPORTATION/TRAFFIC -- Would the project:	Yes = impact No = no impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the addressing the safety or performance of the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?	Add but Keep old language taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
b) Cause vehicle miles traveled (per capita, per service population, or other appropriate measure) that exceeds the regional average for that land use?	Add but Keep old language Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
c) Result in substantially unsafe conditions for pedestrians, bicyclists, transit users, motorists or other users of public rights of way by, among other things, increasing speeds, increasing exposure of bicyclists and pedestrians in vehicle conflict areas, etc.?	This has to do with air travel... Add but Keep old language a change in air traffic patterns , including either an increase in traffic levels or a change in location that results in substantial safety risks?
d) Substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow lanes) or by adding new roadways to the network?	Add but Keep old language increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
e) Result in inadequate emergency access?	
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or	Keep old language Conflict with adopted policies, plans, or programs regarding public

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safety of such facilities?	transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?
[@c]	
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Appendix A	
Frequently Asked Questions	
1. What is “level of service” and how is it used in environmental review?	
<p>Many jurisdictions use “level of service” standards to measure potential transportation impacts of development projects and long range plans. Commonly known as LOS, level of service measures vehicle delay at intersections and on roadways and is represented as a letter grade A through F. LOS A represents free flowing traffic, while LOS F represents congested conditions. LOS standards are often found in local general plans and congestion management plans. LOS is also often used in traffic impact studies prepared under the California Environmental Quality Act (CEQA). Exceeding LOS standards can require changes in proposed projects, installation of additional infrastructure, or, in some cases, financial penalties.</p>	<p>There are many elements to a traffic analysis , LOS is only one measurement.</p> <p>LOS can also help the traffic engineer to determine if there are other issues that need to be addressed in the project such as signal timing changes, pedestrian walk timing, etc.</p>
2. What is wrong with treating congestion as an environmental impact under CEQA?	
<p>Stakeholders have reported several problems with level of service, and congestion generally, as a measure of environmental impact under CEQA. First, as a measure of delay, congestion measures more of social, rather than an environmental impact. Second, the typical way to mitigate congestion impacts is to build larger roadways, which imposes long-term maintenance costs on tax-payers, pushes out other modes of travel, and may ultimately encourage even more congestion. Third, addressing congestion requires public agencies to balance many factors, including fiscal, health, environmental and other quality of life concerns. Such balancing is more appropriate in the planning context where agency decisions typically receive deference.</p>	<p>LOS is an indicator, it allows the engineer a tool to differentiate between projects which may have some impact from those which will have significant impact.</p> <p>LOS levels above C are indicators that adjustments may need to be considered. As communities grow, traffic patterns change, this tool allows engineers to make the necessary adjustments.</p> <p>LOS issues in our county are not typically addressed by larger roadways. Instead they are addressed by traffic management improvements that minimize residential street congestion that cut thru traffic may create.</p>
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<p>Safety is an issue that both the statute and these proposed Guidelines identify as a potential area of study under CEQA. Level of service does not itself measure safety. For example, higher level of service often indicates higher vehicle speeds, which put all road users at greater risk in the event of a collision. On the other hand, it may indicate areas where large speed differentials might occur, for example an off ramp backing up onto a highway mainline. Where analysis is needed to determine the significance of potential safety impacts, that analysis will still be required under these proposed Guidelines.</p>	<p>LOS does not measure speed. Tube counts measure volume and speed. These are indicators that there are issues in the system...including poor driver behavior. Define "Higher levels of service" A is higher than F. LOS of A does not translate to speeding.</p> <p>Speeding may occur because drivers are trying to avoid a congested intersection or corridor. They drive fast thru the residential street to avoid the corridor, thinking that driving fast will make up for the extra distance they need to drive. Proper use of the analysis tools will highlight problem areas. This in turn will assist the engineer in making adjustments.</p>
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10. My community does not have frequent transit. What options are available for reducing VMT?	Mixing air quality tools with congestion management tools.
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Appendix C	
Technical Considerations in Assessing Vehicle Miles Traveled	
<p>Many practitioners are familiar with accounting for vehicle miles traveled, commonly referred to as VMT, in connection with long range planning, or as part of the analysis of a project's greenhouse gas emissions or energy impacts. This Appendix provides background information on how vehicle miles traveled may be assessed as part of a transportation impacts analysis under the California Environmental Quality Act.</p>	<p>We should be careful to separate long range planning with site specific needs. The tools used are different. VMTs are used for long range planning to address future needs for major infrastructure projects. Traffic simulation models are used to improve existing infrastructure and performance.</p>
What VMT to Count	
<p>The simplest and most straightforward counting method is to simply estimate VMT from trips generated or attracted by a project (i.e., from trips made by residents, employees, students, etc.). This method is known as trip-based VMT. Agencies with access to more sophisticated modeling capabilities have can examine VMT in a more comprehensive manner,</p>	<p>Traffic simulation models use Trip Generation via ITE manuals to scientifically address probable trips.</p>

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<p>examining projected travel behavior, including effects the project has on other trip segments. For projects that might replace longer trips with shorter ones, a lead agency might analyze total area-wide VMT to see whether it would decrease were the project to be built. These methods are described below. [Additional background information regarding travel demand models is available in the California Transportation Commission’s “2010 Regional Transportation Plan Guidelines”, beginning at page 35.]</p>	
<p>Trip-based VMT</p>	
<p>Trip-based VMT includes all VMT from trips that begin or end at the project. It answers the question, “How much driving would be needed to get people to and from the project?” The Standard 4-step travel demand models can measure trip-based VMT. For residential development, trip-based VMT is called home-based VMT.</p>	<p>Most projects do not know where the trips begin or end. They may not even know who the tenants will be such as a multi-use facility.</p>
<p>Tour-based VMT</p>	
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<p>Measuring VMT for Land Use Projects</p>	
<p>The proposed Guidelines suggest that projects generating or attracting greater than regional average VMT may be an indication of a significant transportation impact. Similarly, the proposed Guidelines suggest that a net reduction in VMT may be an indication of a less than significant impact. The paragraphs below provide additional detail on how an agency might make those determinations.</p>	<p>These measurements are appropriate for a regional analysis but not appropriate at a local level.</p>
<p>Calculating Regional Average VMT</p>	
<p>When comparing project VMT to regional average VMT, the same denominator and VMT counting method (trip-based or tour-based) should be used. For example, a trip-based VMT analysis for a residential project, which estimates home-based VMT per capita, should be compared with the regional total home based VMT divided by the total regional population. Totals should be taken over the entire region, i.e. the full geography of the MPO or RTPA.</p>	<p>Additional data needs to be collected if this data is to be used at a local level.</p>
<p>Demonstrating a Reduction in Area-Wide VMT</p>	
<p>The area-wide method of counting VMT may be used to determine whether total VMT increases or decreases with the project. The area chosen for</p>	<p>It will be very expensive to have developers provide this data without assistance from the region.</p>

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analysis should cover the full area over which the project affects travel behavior.	
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<p>Transportation projects should assess VMT using the area-wide method. Transit and active transportation projects can generally be presumed to reduce total VMT, unless substantial evidence demonstrates otherwise, because their largest effect on VMT is typically mode shift away from automobile use. Projects that increase physical roadway capacity typically induce additional vehicle travel, generally leading to increases in total VMT. However, a roadway project that improves connectivity can, in some cases, shorten trip lengths sufficiently to outweigh the induced travel effect, leading to an overall reduction in VMT.</p>	<p>Modeling should not be used in land use planning. The project design elements should be include in local land use plans to be incorporated into the proposal. Trying to manage design elements by manipulating transportation models will not yield this outcome.</p>
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Appendix D	
Sample Trip-Based VMT Calculation	There is an error in this calc.
100 single-family detached residential dwelling units x 9.52 vehicle trips per unit =	Error: 9.52 should be 6.0
952 daily vehicle trips	Please adjust
<p>2. Multiply the number of home-based trips by trip lengths. If trip lengths are available by trip purpose, then the trip generation estimate should be divided into purposes based on household survey data or travel forecasting model estimates. Potential sources for trip lengths by purpose are available through the California Household Travel Survey, the National Household Travel Survey, and MPO model estimates. In this simple estimate, only one trip length is assumed to be available and it represents the average weekday trip length for California based on the National Household Travel Survey.</p>	<p>Estimated from census data which maybe 10 years old?</p>
952daily vehicle trips x 10 miles per trip = 9,520 daily VMT	Where did the 10 miles per trip come from?
9,520 daily VMT/100 residential units =	
95.2 daily VMT per residential unit	
<p>3. Divide by the expected average project household occupancy. A specific estimate based on project characteristics (i.e. unit sizes and number of bedrooms) and location is preferable. Here we use the average for Sacramento County, 2.69 persons per household:</p>	

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95.2 daily VMT generated per residential unit / 2.69 persons per unit =	
35.4 daily VMT per capita	Compared to an allowable VMT per capita of?
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Appendix E	
Estimating VMT From Roadway Capacity Increasing Projects	Road projects
When a roadway is serving vehicles at capacity, adding more vehicles will disrupt traffic flow causing speed reductions (i.e., congestion) and reduce throughput. Conversely, reducing the number of vehicles entering a congested roadway will reduce congestion and increase throughput. So, travel demand management programs or traffic systems management programs that reduce vehicle miles traveled loaded onto a roadway can improve throughput without increasing capacity.	If this were true, then no roads would be congested. Traffic patterns are based on need. If circulation improvements are not a consideration, then other methods must be employed. To determine if the proposed project will trigger expansion of the roadway will require a traffic simulation model using LOS as one metric.
What is Induced VMT?	
Additional roadway capacity may lead to additional VMT, a phenomenon known as induced travel, or induced VMT. It occurs when congestion is already present and a capacity expansion will lead to an appreciable reduction in travel time. With lower travel times, the modified facility becomes more attractive to travelers, resulting in the following trip-making changes, which have implications for total VMT:	But if this is the only road which leads to the freeway on ramp, drivers will use it no matter what the LOS. The VMT will not change for this type of roadway.
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demand models can also be used to develop maps depicting VMT generation across the model's geography, providing a quick method for estimating VMT of a project in a certain location.	
Catalog of Models	What is the age of this data? Who will maintain and update this information? How will this data be distributed so that developers have the most up to date information? How will agencies develop a methodology that is consistent for all developers and transparent to the public?