



• 260 North San Antonio Road., Suite B • Santa Barbara, CA • 93110
• Phone: 805/961-8900 • Fax: 805/961-8901 • www.sbcag.org

September 12, 2014

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

Re: Comments on OPR's Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743

Dear Mr. Calfee:

Thank you for the opportunity to comment on the Office of Planning and Research (OPR) preliminary discussion draft of updates to the California Environmental Quality Act (CEQA) Guidelines implementing Senate Bill (SB) 743. As the Metropolitan Planning Organization, Regional Transportation Planning Agency, and Congestion Management Agency for Santa Barbara County, the Santa Barbara County Association of Governments (SBCAG) is interested in providing feedback on the draft CEQA Guidelines and the potential implications for our agency and the local partner jurisdictions that we serve.

As stated in our prior comment letter dated February 7, 2014, the intent of both SB 743 and the proposed CEQA regulations is generally in alignment with the goals and objectives of SBCAG's adopted Regional Transportation Plan-Sustainable Community Strategy. However, giving primary consideration to vehicle miles traveled (VMT) in the evaluation of transportation impacts poses a number of technical and policy issues that merit consideration. Preliminarily, acknowledging the importance of SB 743's goals, congestion nevertheless remains an important local issue that cannot be totally ignored. There is still a role for congestion management as implicitly recognized by the State's retention of congestion management and AB 1600 fee programs based traditional level of service measures. The changes wrought by SB 743 to the CEQA process are fundamental and the time allowed to implement them is short. OPR needs to fully understand the implications of these changes before the CEQA Guidelines revisions become final.

1. **MPO/RTPA Role Should be Made Explicit.** The preliminary discussion draft, the draft guidelines and appendices imply, but do not directly state a role for Metropolitan Planning Organizations (MPOs) and the Regional Transportation Planning Agencies (RTPAs) in applying the new transportation impact measures. If OPR expects MPOs/RTPAs to have a role in CEQA analysis of transportation impacts, the draft Guidelines should be revised to make this role explicit and the State should allocate adequate funding to support any significant, new MPO/RTPA responsibilities.

Member Agencies

Buellton • Carpinteria • Goleta • Guadalupe • Lompoc • Santa Barbara • Santa Maria • Solvang • Santa Barbara County

The draft Guidelines propose the use of VMT as the metric by which “transportation impacts of a project can be best measured” and suggest that the regional average VMT for particular land use types be applied as a threshold of significance for projects. They similarly propose that the significance of a plan’s transportation impacts be determined by reference to the VMT reduction projected to be achieved by implementation of the region’s Sustainable Communities Strategy (SCS).¹ In order to assess transportation impacts of both plans and projects, the VMT generated by every plan or project that is not exempt from CEQA will need to be calculated as part of the environmental analysis.

The Guidelines and Appendices imply that MPOs/RTPAs may be expected to calculate and publish data such as regional VMT by land use type to be used as CEQA thresholds of significance and/or, possibly in certain instances, to be involved in calculation of VMT for individual plans and projects.² Any such additional role would add significant, new responsibilities to MPOs/RTPAs.

At present, most local governments are not equipped to perform the technical analysis required to determine VMT generated by plans and projects or to derive regional VMT thresholds. While some local governments maintain local travel models, regional travel demand models are typically the province of MPOs. Local government staffs do not typically have expertise either to operate such models or to evaluate their outputs.

Meanwhile, MPOs do not have the staff or resources to take on the role of project and plan evaluation. Even in a region as relatively small as SBCAG, thousands of projects are proposed annually that are subject to CEQA. Before MPOs could take on such responsibilities, the state would need to dedicate significant additional funding to MPOs. SB 375 has already saddled MPOs with the requirement to prepare SCSs, without providing them funding to do so.

In general, the Guidelines gloss the technical complexity of travel modeling. Constructing, maintaining and operating travel demand models requires special technical expertise and is hugely resource-intensive. Even the simplest sketch models have many inputs, assumptions and variables. They must be calibrated or they are subject to manipulation. Consistency between different types of models at different scales can hardly be assumed.

¹ We understand that the draft Guidelines leave lead agencies the discretion to determine thresholds of significance. Most, however, will presumably take OPR’s lead and rely on a regional standard.

² Appendices C through F are replete with references to MPOs’ travel demand models. These appendices offer information on technical considerations for assessing VMT, sample trip-based VMT calculation, estimating induced VMT from roadway projects, and available models for estimating VMT. Appendix C suggests the use of travel demand models to estimate trip-based VMT and makes clear that “[t]ransportation projects should assess VMT using the area-wide method” that goes beyond local government boundaries. Appendix D explains that trip lengths by trip purpose are needed to calculate VMT and suggests MPO model estimates, the California Household Travel Survey or National Household Travel Survey as sources for this information. Appendix E states that travel demand models must be used to derive induced VMT from roadway projects. App F lists available models including sketch planning tools (such as URBEMIS, CalEEmod, MXD) as well as travel demand models and recognizes that travel demand models require more time, data, maintained by MPOs and RTPAs and some cities and counties. “For this reason, a regional travel demand model already exists in most locations and can be used to develop estimates of VMT” as well as trip length inputs for sketch models and maps of VMT generation, “providing a quick method for estimating VMT of a project in a certain location.”

It may not be possible simply to compare sketch model outputs with regional VMT generated by a regional travel demand model. Regional travel demand models are generalizations that do not replicate the entire road network, assume generalized land uses, and are not suited to project-level analysis. OPR should give additional thought to who will apply the new CEQA transportation impact measures and how these technical issues can be resolved.

- 2. Trip-Based VMT Calculation Using Regional Averages is Overly Simplistic.** The methodology outlined in Appendix D is overly simplistic in that it proposes use of a single, regional average trip length and persons per household, when in fact these variables often vary significantly by sub-region. Use of average regional variables leads to imprecise results.

The draft CEQA Guidelines propose the use of regional average VMT for the given land use types (e.g., residential, employment, commercial) as a threshold of significance. However, the calculation of trip-based VMT using ITE Trip Generation Manual trip rates as well as regional average trip distance and regional average persons per household ignores critical variations with regard to sub-regions and neighborhood characteristics.

For the most part, ITE's trip-generation rates are based on data obtained at suburban locations that lack 4D (Diversity, Density, Design, and Destination) sensitivity. ITE data typically does not take into account variations in type and location (suburban versus urban) of proposed land uses, proximity of transit service, and the existence of pedestrian and bicycle facilities. The common use of suburban-focused vehicular trip generation data in the preparation of traffic impact analyses, combined with a lack of information and techniques on how and when to adjust the data, has often resulted in an application of conventional trip generation rates to proposed infill development, even in places that are compact, highly walkable, and transit-rich. This use of conventional data can over-predict vehicular traffic impacts, including VMT.

There is no clear solution as there is currently no common, widely accepted methodology in the U.S. for estimating multi-modal trip-generation rates associated with infill projects. While some studies have been undertaken (see NCHRP Report 758³), they have not seen widespread use. Unless the State takes the lead in articulating new multi-modal trip generation rates, local agencies may be left to develop and validate local infill trip rates by sponsoring local infill trip generation studies or extracting region-specific travel data via household travel surveys.

Similarly, average trip distance varies depending upon both the trip purpose and geographic location. Identical land uses in different geographical areas may have different trip lengths, something ignored when looking at a simple regional average. Additionally, average trip distances also vary by their sensitivity to the 4D's (Diversity, Density, Design, and Destination). Sketch models that are sensitive to the 4D variables exist, but model inputs and their assumptions would have to be applied uniformly and consistently. Along the same lines, average persons per household vary significantly depending upon geographical location.

³ [Trip Generation Rates for Transportation Impact Analyses of Infill Developments](#), National Cooperative Highway Research Program, Transportation Research Board, 2013.

For example, a proposed new residential project in the Lompoc area is much more likely to have a higher persons per household rate and a longer trip distance to work than the identical residential project in the City of Santa Barbara. Households in the City of Lompoc have on average 2.90 persons per household, whereas the City of Santa Barbara has an average of 2.45 persons per household. Countywide average persons per household, conversely, is 2.86.⁴ The City of Lompoc is characterized by a significant amount of out-commuting to the Santa Maria Valley and Santa Barbara/South Coast region. The average commute distance for Lompoc residents is 13.5 miles. By contrast, households in Santa Barbara are characterized by commutes to jobs to other South Coast worksites. The average commute distance for Santa Barbara residents is 5 miles. The regional average commute distance is 8.3 miles.⁵

For simplicity, the math below assumes the same number of single-family detached residential dwelling units and vehicle trips per unit as the example in Appendix D. By inserting variations in trip lengths and persons per household, the results are as follows:

- 1) **City of Lompoc:** 100 single-family detached residential dwelling units x 9.52 daily vehicle trips per unit = 952 daily vehicle trips. 952 daily vehicle trips x 13.5 miles per trip = 12,852 daily VMT. 12,852 daily VMT/100 residential units = 128.52 daily VMT per residential unit. 128.52 daily VMT per residential unit/2.9 persons per household = 44.3 daily VMT per capita.
- 2) **City of Santa Barbara:** 100 single-family detached residential dwelling units x 9.52 daily vehicle trips per unit = 952 daily vehicle trips. 952 daily vehicle trips x 5 miles per trip = 4,760 daily VMT. 4,760 daily VMT/100 residential units = 47.6 daily VMT per residential unit. 47.6 daily VMT per residential unit/2.45 persons per household = 19.4 daily VMT per capita.
- 3) **Regional Average:** 100 single-family detached residential dwelling units x 9.52 daily vehicle trips per unit = 952 daily vehicle trips. 952 daily vehicle trips x 8.3 miles per trip = 7,902 daily VMT. 7,902 daily VMT/100 residential units = 79 daily VMT per residential unit. 79 daily VMT per residential unit/2.86 persons per household = 27.6 daily VMT per capita.

3. **Induced Travel Demand and State of Travel Demand Modeling Practice.** To estimate induced demand for road capacity projects validly, the existing travel demand models of many MPOs would require re-tooling. The draft CEQA Guidelines state:

To the extent that a transportation project increases physical roadway capacity for automobiles in a congested area, or adds a new roadway to the network, the transportation analysis should analyze whether the project will induce additional automobile travel compared to existing conditions.

Traditional 4-step process travel models generally do not have an explicit induced vehicle demand model. In these 4-step travel demand models, the mode choice step is sensitive to a reduction in congestion, leading to improved highway travel times and a mode shift from other modes (transit, non-motorized) to highway modes. Actual induced demand models, however, add or reduce the number of auto trips by comparing the travel times of a future year with the travel times of the base year to determine trips to add or reduce. This step is not presently in the SBCAG model and presumably also lacking in many 4-step models.

⁴ 2010 Census Data Results, SBCAG, June 2011.

⁵ SBCAG Regional Travel Model, August 2014.

4. **Additional Guidance on Project-related Transportation Effects on Safety.** In order to assist lead agencies with setting their safety thresholds, OPR should provide further guidance and define the terms “substantially unsafe conditions” and “vehicle conflict areas” as used in Appendix G, Section XVI(c). The draft Guidelines state that “a lead agency may also consider localized effects of project-related transportation on safety.” Included is a non-exclusive list of potential factors that may affect the safety of different roadway users. The CEQA Guidelines require lead agencies to adopt thresholds of significance supported by substantial evidence (Sec. 15064.7). More clarification and definition of these terms are needed to allow lead agencies to set justifiable thresholds. It should also be noted that congestion can contribute to safety issues by increasing the risk of accidents. OPR should give some additional consideration to this factor.

5. **Additional Guidance on Analysis of Indirect Effects.** The draft CEQA Guidelines state:

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 document. (p. 13)

Congestion, in the form of idling in traffic, can lead to increased emissions, including increases in particulate matter and greenhouse gas emissions. Air quality analysts have relied upon the data within traffic impact studies to determine localized air quality impacts within CEQA documents. OPR should assure that air quality impact analysis includes evaluation of potential impacts due to congestion.

6. **Requirement for Updates to Congestion Management Programs.** The draft CEQA Guidelines propose that automobile delay caused by a project (as measured by level of service) would no longer constitute a significant environmental impact. In the draft CEQA Guidelines, OPR is also proposing significant changes to the Transportation section of the Environmental Checklist – Appendix G, which would eliminate consideration of a project’s potential conflicts with a CMP:

XVI. TRANSPORTATION/TRAFFIC – Would the project:

...

b) Cause vehicle miles traveled (per capita, per service population, or other appropriate measure) that exceeds the regional average for that land use?
~~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?~~

SBCAG’s CMP contains project-specific impact thresholds which are presently utilized in CEQA analysis. When the CEQA Guidelines become final, these CMP thresholds would no longer be applicable and SBCAG would be obligated to update the CMP to eliminate these thresholds. To the extent that local jurisdictions rely on these thresholds to impose mitigation through project conditions, they may no longer be able to establish a nexus to project conditions identified in a CMP deficiency plan.

7. **Policy Inconsistencies: LOS Standards Retained under Congestion Management Programs.** The CEQA Guidelines would eliminate a project's consideration of conflicts with a CMP. However, under State law, Congestion Management Agencies would still generally be required to retain and implement traffic level of service standards through their Congestion Management Programs (see Gov. Code Section 65089(a)).

Only where local jurisdictions voluntarily designated "infill opportunity zones" within SCS transit priority areas would LOS standards no longer apply. Outside of such "infill opportunity zones," CMAs would continue to identify deficiencies based on traditional measures of congestion and require local jurisdictions to develop deficiency plans to address congested areas. Often as not, those deficiency plans will rely on capacity-increasing measures like additional lanes to address local congestion problems.

SB 743 and the CEQA Guidelines thus mask a policy inconsistency with the existing CMP framework. CMAs, which, like SBCAG, often also serve as MPOs/RTPAs, would on the one hand pursue VMT-reducing policies through their SCSs and on the other hand simultaneously seek to cure congestion by traditional capacity-enhancing means through their CMPs. OPR should consider how best to resolve such policy inconsistencies.

Thank you again for the opportunity to comment and please do not hesitate to contact me with any questions.

Sincerely,



Jim Kemp
Executive Director