SUMMARY
The Los Angeles Departments of City Planning (DCP) and Transportation (LADOT) are updating the City’s California Environmental Quality Act (CEQA) Transportation Section of the City’s California Environmental Quality Act (CEQA) Thresholds Guide to comply with and implement Senate Bill (SB) 743 (Steinberg, 2013). In 2013, the State of California signed SB 743 into law, which requires a shift in the way cities measure environmental impacts. The Office of Planning and Research (OPR) is requiring all cities to measure transportation impacts with vehicle miles traveled (VMT) to determine the significance of transportation-related impacts under CEQA.

LADOT is also revising its Transportation Assessment Guidelines for evaluating project-level transportation review outside of the requirements under CEQA. The update will help to better assess how proposed projects may affect the City’s transportation system.

BACKGROUND
The City of Los Angeles is updating the Transportation Section of the Los Angeles CEQA Thresholds Guide to comply with State legislation (Senate Bill 743). State guidelines require all cities to update their transportation impact analysis metrics from level of service (LOS) to vehicle miles traveled (VMT) before July 1, 2020. This approach prioritizes the safety and access of all street users.

FREQUENTLY ASKED QUESTIONS

How is Level of Service measured?
Level of Service (LOS) is a measure of traffic delay at signalized intersections or roadway segments. LOS rates street operations and traffic flow conditions using a letter-grade system ranging from A, or free-flow conditions with little or no delay, to F, or gridlocked conditions with excessive delays.

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 further 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, generating 250 or more daily trips, will be required to analyze environmental impacts related to transportation as part of their environmental review process.

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

If a development project exceeds the screening criteria or 250 or more daily trips, the applicant will 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, the applicant would input the project’s address, land use mix, and intensity. The tool then assigns trip generation and travel characteristics, derived from local travel data, to estimate the VMT (per capita or per employee) generated by people travelling 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 strategies to select from that have been proven to reduce VMT.

**How were the CEQA impact criteria thresholds determined for land use projects?**

OPR recommends setting the significant impact criteria threshold for residential and office projects to 15% below the existing VMT per capita of the region, however DCP and LADOT are recommending a more context-sensitive approach that acknowledges the vast scale of the Southern California region. The City of Los Angeles is California’s largest city, and more populous than all but two of the 18 regional metropolitan planning organizations (MPOs) in the State. In addition, the city’s average VMT is much lower than the regional average, as compared to neighboring cities and counties.

A more context-sensitive approach can consider the variations in transportation and land use patterns.
reflected in diverse areas in the second largest city in the nation. Accordingly, DCP and LADOT recommend to compare the estimated VMT of a project to the average VMT per capita observed within the boundaries of their respective Area Planning Commission (APC). 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 following table summarizes the recommended thresholds by APC, and the map displays APC boundaries.

<table>
<thead>
<tr>
<th>Area Planning Commission</th>
<th>VMT per capita</th>
<th>VMT per employee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central</td>
<td>6.0</td>
<td>7.6</td>
</tr>
<tr>
<td>East LA</td>
<td>7.2</td>
<td>12.7</td>
</tr>
<tr>
<td>Harbor</td>
<td>9.2</td>
<td>12.3</td>
</tr>
<tr>
<td>North Valley</td>
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<td>15.0</td>
</tr>
<tr>
<td>South LA</td>
<td>6.0</td>
<td>11.6</td>
</tr>
<tr>
<td>South Valley</td>
<td>9.4</td>
<td>11.6</td>
</tr>
<tr>
<td>West LA</td>
<td>7.4</td>
<td>11.1</td>
</tr>
</tbody>
</table>

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 list of mitigation measures within the VMT Calculator will be available. These mitigation measures are selected based on available evidence of demonstrated ability to reduce VMT. Examples of measures include transit incentives, education and marketing, commute trip reductions, parking management, improved neighborhood connectivity, and shared mobility options.

How does this affect projects that have initiated or are going through the entitlement process?
For projects already in their entitlement process and with a signed memorandum of understanding (MOU) with LADOT, the option will be available to select the transportation impact analysis approach most appropriate for the proposed project’s current stage. 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 the transportation section 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 still be measured?
The City may request that proposed projects measure vehicle level of service to evaluate scenarios outside of CEQA review 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 level of service 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 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?
The cities of Pasadena, San Francisco, Oakland, and San Jose have adopted VMT as the new metric for analyzing transportation impacts. All California cities must update the way transportation impacts are analyzed under CEQA before the deadline of July 1, 2020.

When would the updates go into effect?
The updated CEQA Transportation Section is expected to be presented before the City Planning Commission, City Council committees, and City Council in early 2019 (check the DCP and LADOT project websites for updated dates). Following adoption, there will be a phase-in period for projects that have already initiated their environmental review process, ending in July 1, 2020.

Where can I learn more?
Upcoming open house dates and project resources are available on the DCP and LADOT project websites.
Who can I contact for more information?
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