

# SB 743: Updating Transportation Metrics in CEQA



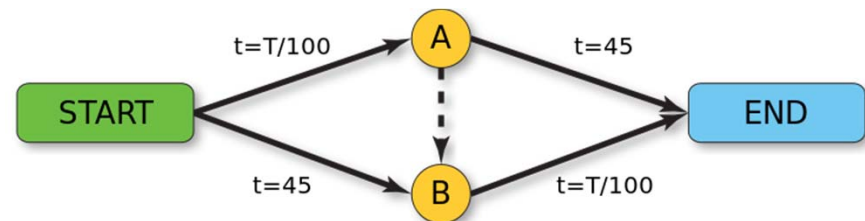
1. Problems with LOS
2. What 743 does and doesn't do
3. Alternative metrics
4. Overview of comments
5. Background on CEQA principles
6. Process & next steps

# Problems with LOS

- 1. Bias against infill because of “last-in development” problem**
  - Infill loads relatively little traffic onto the regional network
  - However, LOS methodology adds traffic generated by infill to existing traffic, triggering thresholds
- 2. Scale of analysis is too small**
  - Registers impacts adjacent to project, ignores impacts regionally
  - Spot metric insufficient to show corridor/network impact/benefit



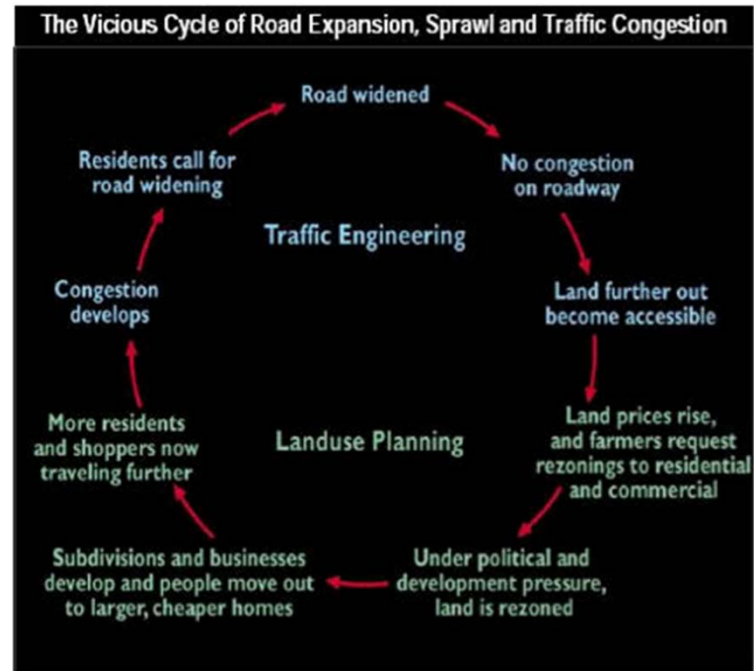
David Paul Morris / SFC



# Problems with LOS

## 3. LOS mitigation is itself problematic

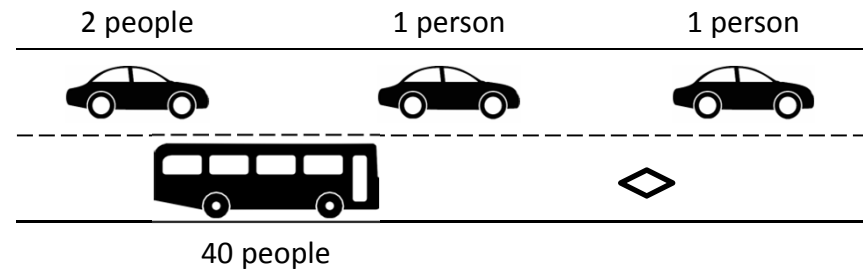
- Reducing project size pushes development to worse locations
- Widening roadways worsens livability, induces vehicle travel



Graphic: NJ DOT

## 4. Mischaracterizes transit, biking, walking as detriments to transportation

- A transit priority lane worsens LOS even as it improves person-throughput
- LOS characterizes pedestrians and cyclists as obstructions to cars, to be channeled/restricted

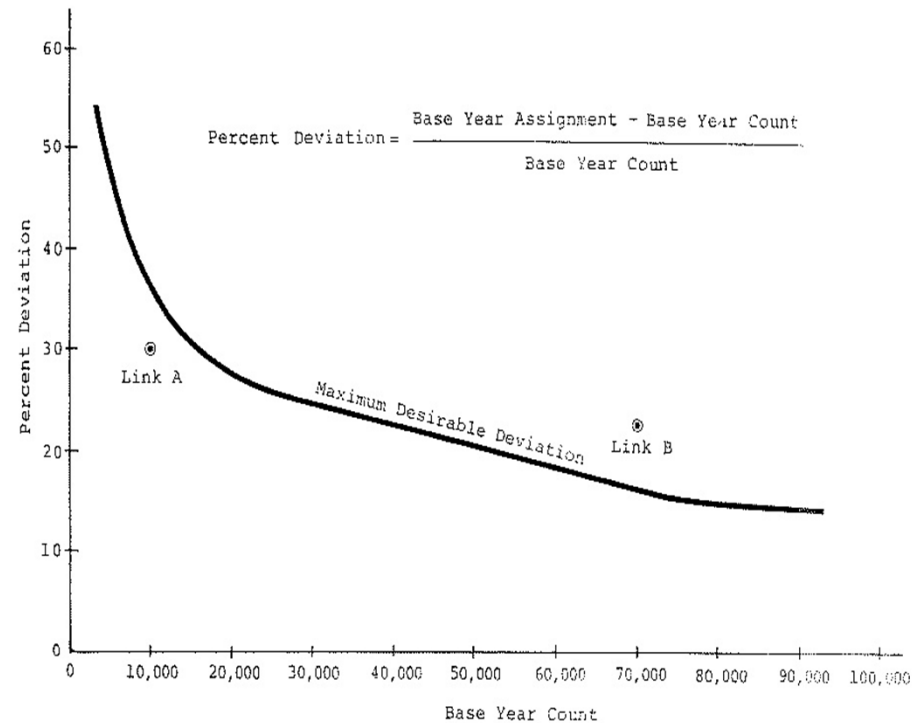


# Problems with LOS

## 5. LOS has a well-developed methodology, but is not more precise than other metrics

- Trip distribution is difficult to predict accurately
- LOS is sensitive to error in trip distribution

From: CDM Smith, Traffic Forecast Guidelines for the 2010s



## 6. Delay-based metrics are problematic for modern transportation planning

- The purpose of transportation is *access to destinations*
- With smart growth, delay metrics sometimes get that backwards

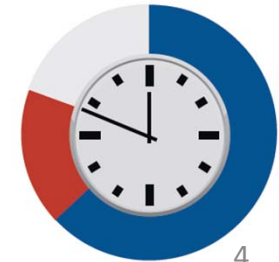
### Denver 1982

1.09  
50.6 minutes  
 46.4 mins  
4.2 mins

Travel Time Index  
 Average travel time  
 Travel time without traffic  
 Extra rush hour delay

### Denver 2007

1.31  
49.6 minutes  
 37.9 minutes  
11.7 minutes



# Problems with LOS

## 7. Maintaining roads built under existing LOS thresholds are beyond most jurisdictions' means

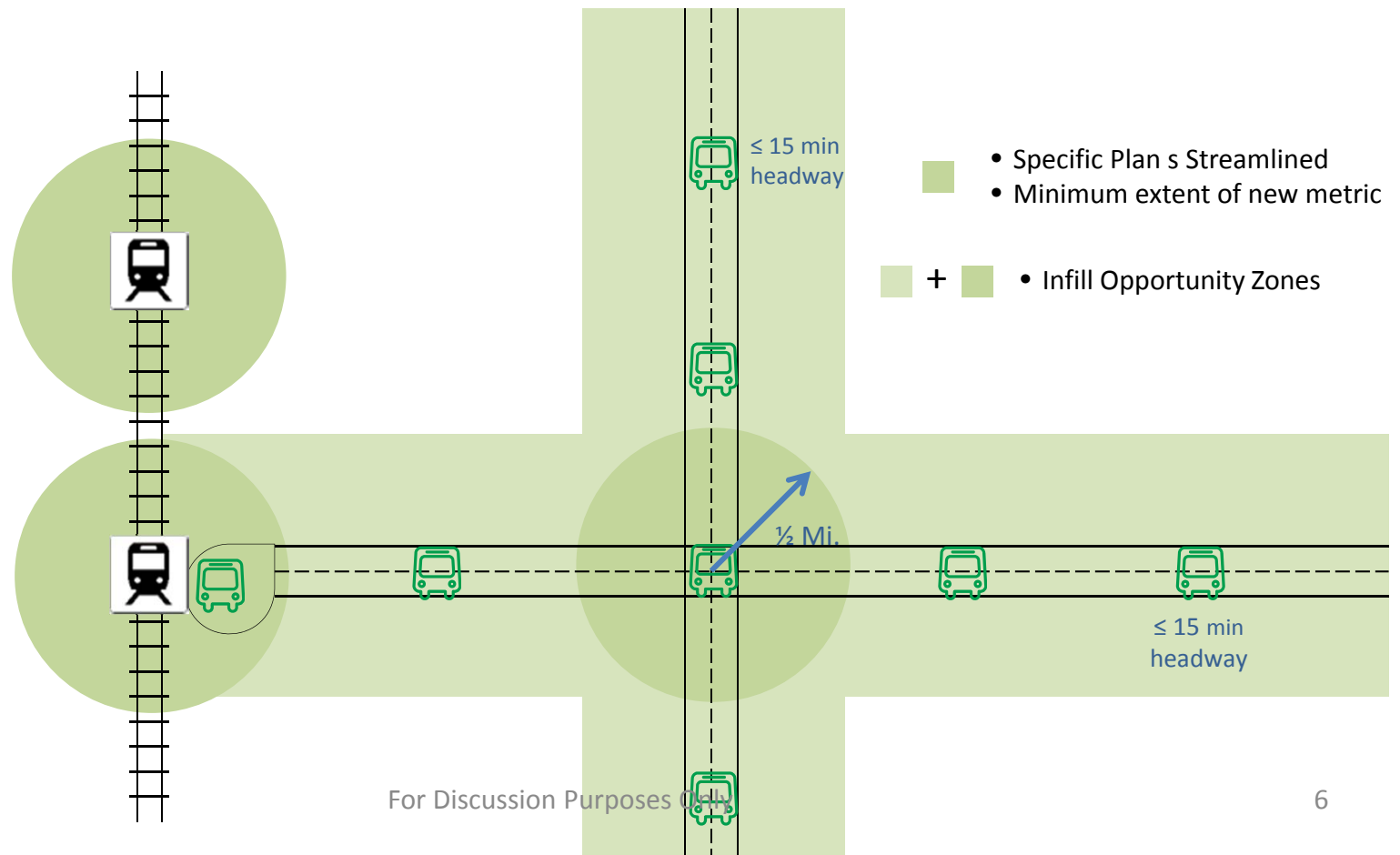
- Substantial maintenance shortfalls even for existing roads
- Maintaining LOS thresholds creates additional maintenance burden





# What SB 743 Does

1. Streamlines specific plans in TPAs
2. Allows local jurisdictions to establish Infill Opportunity Zones where LOS does not apply under Congestion Management law
3. Directs OPR to update transportation metrics in CEQA



## What SB 743 Does Not Do

- Does *not* prevent locals from considering capacity/congestion issues
- Does *not* affect existing GPs
- Does *not* affect existing fee programs
- Does *not* affect projects that are already in the pipeline

# What are we looking for in a metric?

SB 743: “criteria shall promote...”

1. “...Reduction of GHGs”
2. “...Development of multimodal transportation networks”
3. “...A diversity of land uses”

## Other policy and administration goals

- Consistency with State planning priorities (Infill priority)
- Environmental benefit
- Fiscal benefit
- Equity
- Health
- Simplicity/feasibility
- Access to destinations



## Candidate Metrics Examined in *Preliminary Evaluation*\*

- Vehicle Miles Traveled\*
- Automobile Trips Generated\*
- Multi-modal Level of Service
- Fuel use
- Vehicle Hours Traveled
- Presumption of less than significant transportation impact based on location

\* Recommended for consideration by the statute

## Comments on LOS

- Some expressed support for moving away from LOS in CEQA
  - Counter to infill priority
  - Counter to environmental protection
  - Calculating LOS is cumbersome
- Some supported keeping LOS in CEQA
  - Familiar, used in other contexts
  - Tied to resident concerns
  - Tied to impact fees
- Broad recognition of LOS shortcomings

## Comments on VMT

- This alternative received the most attention
  - Widespread acceptance within TPAs
  - Mixed opinions on replacing LOS with VMT beyond TPAs
- Concerns
  - Accuracy of estimates and models
  - Availability of tools and models
  - How to link project VMT increases to transportation network improvements
  - Does not address operational issues
  - Duplicates other analyses

## Comments on VMT (cont.)

- Benefits of a VMT system
  - Could lead to better system-wide planning
  - Better relationship to environmental impacts
  - Consistent with other statewide and regional goals
  - VMT is already used in other analyses (e.g. GHG assessment)

## Comments on Other Alternatives

- Little support for Fuel Use, VHT, ATG, MMLoS
- Mixed opinions on location-based presumptions

## Comments on Scope: TPA/beyond TPA

- Potential confusion that may result from adopting an alternative in some areas and not others
- Broader alignment of metric with environmental benefit, other state goals
- Concern that VMT is not a good measure in areas that are not served by transit (i.e., suburban and rural areas)
- Concern about projects that might straddle a TPA boundary, or have impacts across TPA boundaries

## Other comments

- Localized safety
  - Not adequately captured by design guidelines
  - Desire for more tools and resources for local governments
  - Need any analysis to be transparent, replicable



# Underlying CEQA Principles

- Focus is on environmental impacts
- Use judgment based on available data and information
- Absolute precision is not required
  - Analysis can be use fact-based assumptions, estimates, projections
  - Mitigation need only be related, and roughly proportional, to project impacts
- Should consider both alternatives and mitigation

## Next Steps

- Draft of CEQA guidelines released for public review late spring/early summer
- OPR submits draft guidelines to Resources Agency by July 1, 2014
- Resources agency takes the guidelines through the formal rulemaking process
- Finalized as soon as early 2015

# Thank you!

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