



CITY *of* CALABASAS

TRAFFIC AND TRANSPORTATION COMMISSION AGENDA REPORT

DATE: OCTOBER 19, 2023

TO: TRAFFIC AND TRANSPORTATION COMMISSION

FROM: PHILIP LANZAFAME, INTERIM PUBLIC WORKS DIRECTOR

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SUBJECT: UPDATE TO CITY'S TRANSPORTATION IMPACT THRESHOLDS

MEETING
DATE: OCTOBER 24, 2023

BACKGROUND:

The City, in compliance with State law, is required to establish specific transportation impact thresholds for California Environmental Quality Act (CEQA) review for projects within the City. The laws and rules governing the CEQA process are contained in the CEQA Statute (Public Resources Code Section 21000), the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000), relevant published court decisions interpreting CEQA, and locally adopted CEQA guidelines or procedures.

State Law no longer allows agencies to use vehicle Level of Service (LOS) as the primary and only method to measure transportation impacts of a project. The law requires the use of Vehicle Miles Traveled (VMT) for determining a CEQA Environmental Impact. However, it does not prohibit an agency from also requiring a separate LOS analysis to be performed to understand the effects of a project on the local network and project site. Because of this recent change, agencies are required to adopt new CEQA related transportation impact thresholds based on VMT.

The Commission has previously discussed and recommended, these thresholds as follows:

1. July 2020 – TTC Workshop/Presentation to discuss VMT and VMT impact thresholds. Commission members provided feedback to staff.
2. September 2020 – TTC approved new VMT thresholds, consistent with the State's recommendations of 15%, and recommended forwarding the recommendation to the City Council.
3. June 2021 – TTC Reviewed and supported revised Transportation Study Guidelines that require a project to perform a Transportation Impact Assessment to reflect the new VMT thresholds for CEQA environmental compliance and to perform a Local Transportation Assessment to provide an evaluation of LOS and other operational/safety criteria for local transportation impacts.

The California Code of Regulations (COR) are the official policies of the State as approved by the applicable agency. In this case, CEQA regulations fall under the Natural Resources Agency, which has adopted specific considerations for evaluating a project's transportation impacts in Section 15064.3. This section can be summarized as follows:

- Generally, VMT is the most appropriate measure of transportation impacts.
- Land use projects that create VMT exceeding an applicable threshold of significance may indicate a significant transportation impact except:
 - Projects within one-half mile of an existing major transit stop or stop along an existing high-quality transit corridor should be presumed to cause a less than significant impact.
 - Projects that decrease VMT in the project area should be presumed to cause a less than significant impact.
- Transportation Projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact.
- The lead agency has the discretion to choose the most appropriate methodology to evaluate a project's VMT.
- Requirements shall apply beginning on July 1, 2020.

Since VMT is a new methodology to analyze transportation impacts, there has been a need to develop appropriate guidance for projects subject to environmental review. As required by the PRC, a technical advisory was issued in 2018 by the California Office of Planning and Research (OPR) to assist agencies with compliance and recommending thresholds for agencies to consider. This technical advisory has recommendations for methodologies and thresholds, but they are not required to be followed by local agencies. The OPR recommends that the threshold for land use projects be where the project projected VMT exceeds 15% below the baseline

condition. For the City, the baseline is the citywide VMT per unit (per capita, per employee, or per service population). The County of Los Angeles also established guidelines and threshold recommendations that substantially comply with State requirements, but the threshold is 16.8% instead of 15%. The difference is that the County of Los Angeles is using regional air quality goals rather than statewide air quality goals.

DISCUSSION/ANALYSIS:

Previous staff recommendations and Commission-approved thresholds were based on the State's recommended 15%. At the time, staff recommended this threshold to be consistent with the State's recommendations. In addition, during the review and final approval of the new General Plan Update, language was added to the General Plan indicating a desire to include the previous LOS thresholds as a part of the formally adopted thresholds rather than just VMT.

OPR, in their guidance, recommends that agencies adopt a threshold of 15% reduction from the baseline VMT as the threshold for identifying a significant VMT CEQA impact based on VMT reductions needed to reach statewide climate goals. The County of Los Angeles, however, developed a slightly higher threshold of 16.8% based on the California Air Resources Board research to reach an 80% reduction of greenhouse gas emissions by 2050. This is slightly higher than what is recommended by OPR because the research is based on meeting slightly different goals. Staff now recommends using the 16.8% threshold to match the Los Angeles County threshold which targets achievement of sustainability goals outlined in the County's Climate Action Plan. This is in alignment with the initial comments from a City Councilmember and will be consistent with other agencies in the region who also follow the County thresholds.

Because of the final language of the General Plan and comments by members of the City Council, the staff is bringing the thresholds back to the Commission for review and approval. Staff recommends that the Traffic and Transportation Commission approve the following revised Transportation Impact Thresholds related to Transportation Analysis and forward the recommendation to the City Council.

A. For California Environmental Quality Act (CEQA) Compliance

Land Use and Plan Project VMT Thresholds

Project Type	Threshold for Determination of Significant VMT Impact
Residential Project	Project exceeds 16.8% below citywide Baseline VMT for Home-Based VMT per Capita
Employment (Commercial or Industrial) Project	Project exceeds 16.8% below citywide Baseline VMT for Home-Based Work VMT per Employee
Regional Retail Project	Project results in a net increase in total VMT in comparison to the citywide Baseline VMT
Mixed-Use Projects	Evaluate each project land use component separately using the criteria above
Land Use Plans	Plan exceeds 16.8% below citywide Baseline VMT for Total VMT per service population
Other land use types	Project exceeds 16.8% below citywide Baseline VMT. For land use types not listed above, the City can determine the appropriate VMT metric depending on the project characteristics. For projects that are generally producing job-related travel, the employment generating VMT (Home-Based Work VMT per Employee) can be compared to the Baseline. For other projects, the total VMT per service population can be compared to the citywide Baseline, or the net change in Total VMT can be estimated.

Transportation Project VMT Thresholds

Project Type	Threshold for Determination of Significant VMT Impact
Transportation Projects	Project results in an increase in VMT in the study area in comparison to Baseline conditions

B. For Local Transportation Operational Impacts:

LOS Thresholds for City-Operated Signalized Intersections

LOS without Project	LOS with Project	Average Total Delay (Seconds per Vehicle)	Project-Related Increase in Seconds of Average Total Delay
A, B or C	D, E or F	-	Any increase in delay
D, E or F	D, E or F	> 35.0	Equal to or greater than 5.0 seconds

LOS Thresholds for Signalized Intersections at Freeway Interchanges

LOS without Project	LOS with Project	Average Total Delay (Seconds per Vehicle)	Project-Related Increase in Seconds of Average Total Delay
A, B, C or D	E or F	-	Any increase in delay
E or F	E or F	> 55.0	Equal to or greater than 5.0 seconds

LOS Thresholds for Unsignalized (Multi-Way Stop) Intersections

LOS without Project	LOS with Project	Average Total Delay (Seconds per Vehicle)	Project-Related Increase in Seconds of Average Total Delay
A, B or C	D, E or F	-	Any increase in delay
D, E or F	D, E or F	> 25.0	Equal to or greater than 3.0 seconds

LOS Thresholds for Unsignalized (Side-Street Stop) Intersections

LOS with Project	Average Total Delay for Side-Street Approach (Seconds per Vehicle)	Project-Related Increase in LOS or Seconds of Average Total Delay
D	> 25.0 to 35.0	LOS C or better to LOS D or worse, and meets the peak hour warrant for a traffic signal
E	> 35.0 to 50.0	LOS D or better to LOS E or worse, and meets the peak hour warrant for a traffic signal
F	> 50.0	LOS E to LOS F, or > 10 seconds of delay for worst-case approach if already at LOS F; and meets the peak hour warrant for a traffic signal

VMT Impact Evaluation Process

Projects that are submitted to the City and require CEQA review and approval will first go through a screening process and then, if they do not get screened out, would have to be further evaluated for their VMT impacts. The process for screening review is allowed by the State Guidelines and is described below.

Screening Criteria

If a project does not pass an initial screening test, then a full VMT impact analysis is warranted. In all, the process will include the following steps:

Step 1: Check Project Type for Screening

Certain project types may be presumed to have a less than significant impact. For instance, maintenance of existing facilities, installation of safety devices, installation of bicycle or pedestrian facilities, reducing existing vehicle lanes, modifications to on-street parking, adding alternative fuel charging infrastructure, local serving retail projects (less than 50,000 square feet) generally improve the convenience of shopping close to home and has the effect of reducing vehicle travel. This could be applied to individual businesses in a community-based shopping center. Similarly, adding local neighborhood serving parks and schools can reduce vehicle travel from facilities located further away. The following types of uses could be presumed to have a less than significant impact as their uses are local serving in nature or generate less than 110 daily vehicle trips (specific threshold provided by the State):

- Local-serving retail establishments (less than 50,000 sf each)
- Local-serving K-12 schools
- Local parks
- Day care centers
- Local-serving gas stations
- Local-serving banks
- Local-serving medical offices
- Local-serving community assembly uses (community organizations, places of worship, etc.)
- Local-serving restaurants
- Local-serving hotels (e.g. non-destination hotels)
- Student housing projects
- Local serving community colleges that are consistent with the assumptions in the Regional Transportation Plan and Sustainable Community Strategy

- Projects generating less than 110 daily vehicle trips. The City would estimate trip generation for a project that may fall in this area and compare it to the 110 daily trip limit criteria. This generally corresponds to the following “typical” development:
 - 11 single family housing units
 - 16 multi-family, condominiums, or townhouse housing units
 - 10,000 sq. ft. of office
 - 15,000 sq. ft. of light industrial
 - 63,000 sq. ft. of warehousing
 - 79,000 sq. ft. of high cube transload and short-term storage warehouse
- Other locally serving land uses as determined by the Community Development Director

Step 2: Check for Low VMT Area Screening

Residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact. In addition, other employment-related and mixed-use land use projects may be screened if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area.

Low VMT-generating areas are those that have VMT 16.8% lower than the baseline VMT. To develop these screening maps a travel forecasting model was used to measure VMT performance for individual traffic analysis zones (TAZs) based on land use type. TAZs are geographic polygons similar to census block groups used to represent areas of travel behavior. Home-based VMT per resident and home-based-work VMT per employee were estimated for each TAZ and a map was created for each. The maps are shown in the Fehr & Peers report as Figures 5 and 6.

To identify if the project is in a low VMT-generating area, the City would review the map that corresponds to the land use type. If the project was within the low VMT-generated area it would be screened out. The City would need to identify that the project is consistent with the existing land uses within that TAZ and use professional judgement that there is nothing unique about the project that would otherwise be misrepresented utilizing the data from the travel demand model.

Step 3: Check for Transit Priority Area (TPA) Screening

Projects located within a TPA may be presumed to have a less than significant impact. Transit priority areas are defined as ½ mile from an existing High-Quality Transit Corridor (15 min headway or better during peak periods) stop or ½ mile around an existing major transit stop such as a Metrolink station or regional bus

service stop. The current transit service map is shown in the attached Fehr & Peers report as Figure 7. The City does not currently have transit services that would qualify as high-quality transit.

Land Use Project Thresholds

Projects not screened through the steps above would then complete a VMT analysis and forecasting to determine the projected VMT from the development project. The VMT would then be compared to the City's adopted thresholds to determine if there is a significant impact or less than significant impact for CEQA compliance.

Mitigation

If a project has a significant impact Transportation Demand Management (TDM) strategies would need to be built into the project to reduce the VMT below the threshold. The following key strategies were identified as the most appropriate.

- diversifying land use
- improving pedestrian networks
- implementing neighborhood traffic management infrastructure
- building bicycle network improvements
- installing workplace bike storage, locker, and shower facilities
- encouraging telecommuting and alternative work schedules
- providing commute-based ride-share programs such as carpooling and vanpooling
- providing local micro transit options such as shared bikes or scooters for short local trips
- subsidizing non-vehicle commute trips

Mitigation Monitoring

Developments that needed to have mitigation measures would look at the available options for reducing their VMT impacts and the measures would be built into the development and the developer would be responsible for ensuring these measures remain in place. The City will have to develop a VMT mitigation monitoring program to periodically review the mitigation measures and determine if they are being met or not. This would be additional work effort by City staff on an annual or bi-annual basis depending on the monitoring requirements set forth in the conditions of approval. Monitoring may consist of the following items:

- Confirming physical on-site requirements
- Confirming physical off-site requirements
- Reviewing program materials and participation

- Counting number of vehicle trips
- Reviewing subsidy payments

Typically, this would be a self-certification submittal to the City and City staff would confirm

Transportation Project Thresholds

CEQA review is also required for transportation projects. These projects have the potential to change travel behavior and travel patterns. These projects are required to quantify the amount of additional vehicle travel and assess air quality, greenhouse gas, energy, and noise impacts in order to determine the project impacts. As stated in the California Code of Regulations Section 15064.3, any transportation project that reduces or has no impact on VMT on the regional network are presumed to have less than significant impact. Types of projects that would fall under this category as stated in the OPR Technical Advisory are:

- Roadway rehabilitation, maintenance, or replacement
- Rehabilitation of existing transportation assets
- Roadway safety projects
- New traffic signals or traffic signal upgrades and improvements
- Addition, removal, or reconfiguration of traffic lanes that are not for through traffic
- Additional roadway capacity on local or collector streets provided that the project also substantially improves conditions for pedestrians, bicyclists, and, if applicable, transit.
- Reduction in the number of through lanes
- Timing of traffic signals to optimize vehicle, bicycle, or pedestrian flow
- Installation of roundabouts or traffic circles
- New transit services
- Addition or modification of on-street parking or loading restrictions
- New or enhanced bicycle or pedestrian facilities within the existing right-of-way
- Installation of publicly available alternative fuel/charging infrastructure

Transportation projects that are presumed to increase VMT on the regional network and therefore may have a significant impact are:

- Roadway capacity enhancing projects such as the addition of through lanes on an existing roadway

- New roadways

For these types of projects, the City will be required to assess the amount of vehicle travel the project will add and compare that to the significance threshold.

Local Transportation Operational Thresholds

In addition to the two VMT and LOS threshold evaluations, the project will be evaluated for various concerns related to access, circulation, safety, sustainability, and emergency evacuation. The following items are to be included in the City's traffic study guidelines but are not specifically thresholds to be adopted.

Site Access

- a) **Intersection and Driveway Sight Distance** – All on-site intersections, project access driveways or streets to public roadways should provide adequate sight distance. Adequate intersection sight distance should be determined using the Caltrans Highway Design Manual or locally developed standards. Within the sight triangles, landscaping, walls/fences, and signs shall be no greater than 30 inches above the finished surface of the adjacent roadway at project opening or in the future.
- b) **Driveway Length and Gated Entrance** – Primary project driveways should have a throat of sufficient length to allow vehicles to enter the project area without causing subsequent vehicles to back up into the public street system.
- c) **Limit Driveway Impacts** – Driveways and local streets access on arterial streets should be limited to minimize the impacts on arterial streets. Driveways should be located to maintain a reasonable distance from an adjacent intersection and/or driveway and align with driveways on the opposite side of the street. Whenever possible, driveways should be consolidated with adjacent properties.
- d) **Corner Clearance** – A driveway should be a sufficient distance from a signalized intersection so that right-turn egress movements do not interfere with the right-turn queue at the intersection. In addition, every effort should be made to provide right-turn egress movements with sufficient distance to enter the left-turn pocket at the adjacent intersection.
- e) **Right Turn Lanes at Driveways** – If the project right turn peak hour volume is 50 or more vehicles, a right-turn deceleration lane should be reviewed for appropriateness on all driveways accessing major arterial and secondary streets. The length of right turn lane should be sufficient to allow a vehicle traveling at the posted speed to decelerate before entering the driveway as outlined in the Caltrans Highway Design Manual.

- f) **Pedestrian Facilities Accessibility** – Provide adequate convenient and direct access to/from the project site.
- g) **Bicycle Facilities Accessibility** – Provide adequate accessibility from nearby bike routes to the project site.
- h) **Transit Stop Accessibility** – Providing convenient and direct access to/from the project and adjacent transit stops.

On-Site Circulation

- a) **Drive-Thru Queuing and Access** – For proposed land uses with drive-thru windows, including restaurants and banks, provide the storage length of the drive-thru lane based on an average headway of 20' per vehicle. Provide an analysis of the average and maximum queues to demonstrate that the queue storage length would be adequate. If possible, the analysis should be based on empirical data from similar stores in the same company or similar stores from another company, preferably from two or more, but at least from one similar store. Maximum queue shall not extend beyond the back of sidewalk at the project driveway, nor shall it intrude into drive aisles external to the store.
- b) **On-Site Large Truck Circulation** – Analyze large truck movements on-site using truck turning template layouts on the site plan, to demonstrate that large trucks can easily maneuver on-site through parking lots and into/out of the loading bays without intruding into parking spaces, etc.

On-Site Safety

- a) **On-Site Sight Distance** – Drive aisles should typically be laid out in a straight line to reduce blind corners at their intersections. Examine all on-site intersections of drive aisles and on-site roadways to ensure there is adequate sight distance for all legs. Within the sight triangles, no landscaping, walls, etc. shall be higher than 30 inches above the finished grade of the adjacent road, at project opening or in the future. Avoid off-set intersections whenever possible.

- b) **On-Site Pedestrian and Bicycle Access** – To maximize active transportation safety on-site by minimizing exposure to traffic, skewed disabled access paths should be avoided whenever possible and made perpendicular to the roadway. Separated pedestrian paths and on-site bike lanes should be provided when possible to minimize conflicts between vehicles, bicyclists, and pedestrian. In locations where project driveways may cross pedestrian or bicycle facilities, operational and safety considerations should be made to avoid or minimize vehicle/pedestrian and vehicle/bicycle conflicts.

Sustainable Transportation

Projects should consider how people walking, biking, and taking public transit will access the project site by ensuring project access points are connected to the surrounding pedestrian and bicycle network. Projects should also be reviewed for potential conflicts with adopted plans and policies related to active transportation, such as the Bicycle Master Plan, and public transportation. Any planned improvements in the immediate vicinity of the project site should be noted and incorporated into the project site plan as necessary.

Emergency Evacuation Evaluation

Projects may be required to perform an analysis regarding emergency evacuation related to disasters such as wildfires or landslides. The local transportation study analyses are not required to evaluate or determine potential impacts related to emergency evacuation; those efforts are to be performed by other consultants who specialize in that field of practice in coordination with the City. However, the local transportation study analyses may be required to include an analysis of roadway demand and capacity during an evacuation event, using data and analysis methodologies determined in collaboration with those experts and the City to support the evaluation and determination of potential impacts.

FISCAL IMPACT/SOURCE OF FUNDING:

There is no direct fiscal impact to the City for adopting new transportation impact thresholds. However, the new thresholds may impact City staff time. Projects implementing mitigation measures that reduce their VMT and/or LOS impacts must be monitored. The monitoring requirements could be a combination of one-time or ongoing staff time, depending on the mitigation measures and the monitoring requirements.

REQUESTED ACTION:

Staff recommends that the Traffic and Transportation Commission adopt new Transportation Impact Thresholds as detailed above and forward the recommendation to the City Council.

ATTACHMENTS: Draft City Council Resolution