



**CITY of CALABASAS**  
**CITY COUNCIL AGENDA REPORT**

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**DATE:** FEBRUARY 1, 2024

**TO:** HONORABLE MAYOR AND COUNCILMEMBERS

**FROM:** CURTIS CASTLE, P.E. , PUBLIC WORKS DIRECTOR  
THOMAS MERICLE, P.E.,T.E., TRAFFIC ENGINEERING SERVICES

**SUBJECT:** APPROVAL OF A RESOLUTION TO ESTABLISH TRANSPORTATION  
IMPACT THRESHOLDS

**MEETING DATE:** FEBRUARY 28, 2024

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**SUMMARY RECOMMENDATION:**

It is recommended that the City Council adopt Resolution No. 2024-1888 (Attachment A) establishing transportation impact thresholds for compliance with the California Environmental Quality Act (CEQA) related to transportation analysis.

**BACKGROUND:**

State Law Change

The City, in compliance with state law, is required to establish specific transportation impact thresholds for 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 and procedures.

The state adopted Senate Bill (SB) 743 in 2013 and codified it in 2018 and as result state law no longer allows agencies to use vehicle Level of Service (LOS) as the primary and only method to measure a project's transportation impacts. The law now

requires Vehicle Miles Traveled (VMT) be utilized to determine a CEQA environmental impact. However, the City can continue to analyze LOS to understand the effects of a project on the local network and project site, but LOS cannot be used to determine CEQA impacts. Because of this change in state law, agencies must adopt new CEQA-related transportation impact thresholds based on VMT.

The passage of SB 743 included the following two intent statements, which were considered when developing the recommended thresholds:

1. Ensure that the environmental impacts of traffic, such as noise, air pollution, and safety concerns, continue to be properly addressed and mitigated through the California Environmental Quality Act.
2. More appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

The California Code of Regulations (CCR) contains 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 were applicable beginning on July 1, 2020.

Since VMT is a relatively new methodology to analyze transportation impacts, there was a need to develop appropriate guidance for projects subject to environmental review. As required by the Public Resource Code (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.

### Local Requirements and Outreach

To comply with the new State requirements, the city contracted with Fehr & Peers, a transportation consultant with significant experience developing VMT thresholds throughout Southern California. Fehr & Peers also provided transportation assistance for the recent General Plan Update. A timeline and description of the City's outreach as it pertains to developing VMT thresholds is provided below.

- On July 28, 2020, staff and Fehr & Peers conducted a workshop with the Traffic and Transportation Commission (TTC) to discuss the impacts of SB 743.
- In September 2020, Fehr & Peers prepared a report that summarized the impacts of SB 743 and provided the framework for the City to develop VMT thresholds. The report was presented to the Traffic and Transportation Commission on September 22, 2020.
- On June 22, 2021, City staff and Fehr & Peers presented and received support from the City's Traffic and Transportation Commission on VMT thresholds. The initial recommendation at that time was a threshold of 15% below baseline VMT, which was the same threshold many other agencies in the state had adopted.
- On January 19, 2023, the Planning Commission reviewed the update to the General Plan Circulation Element, which included language and policies related to the establishment of new VMT thresholds for CEQA review and retaining the existing level of service (LOS) threshold criteria for local traffic operational analysis evaluation.
- The City Council approved the updated Circulation Element on April 26, 2023. The Circulation Element included policies applicable to VMT consistent with state requirements as well as retaining existing LOS criteria.
- At the City Council meeting on May 24, 2023, Public Works requested that the City Council adopt Resolution 2023-1853 to establish transportation thresholds. City Council did not adopt the resolution and requested that staff return with a future agenda item and presentation explaining the item.
- At their October 24, 2023 meeting, Public Works staff provided the TTC with an updated presentation and recommendations related to the traffic analyses and VMT thresholds. The recommendations, approved by the TTC, included (1) establishing a VMT threshold 16.8% below the citywide average VMT to match the County of Los Angeles and regional air quality goals and (2) approving the use of LOS for assessing the local impacts of projects.

## VMT Threshold: 15% vs 16.8% Lower than Baseline

When setting a threshold for projects requiring CEQA analysis, the OPR recommends that land use projects be compared to a baseline VMT to evaluate whether a project would result in impacts and require further analysis. OPR advises that projects that create a VMT that is 15% lower than the citywide VMT baseline would have a less than significant impact. Projects for which the initial analysis resulted in a VMT that was not at least 15% below baseline, could result in impacts and would require further analysis. The baseline for the City of Calabasas is the citywide VMT per unit (per capita, per employee, or service population), so it compares new development to locally-derived VMT data rather than the entire County of Los Angeles.

The County of Los Angeles also established guidelines and threshold recommendations that comply with state requirements, but the threshold is 16.8% instead of 15%. The difference is that the County of Los Angeles uses regional air quality goals rather than statewide goals. City staff recommends that the City follow the County of Los Angeles thresholds rather than the statewide thresholds to provide a more local approach and support the regional goals. On October 24, 2023, the Traffic and Transportation Commission reviewed a revised staff VMT threshold recommendation of 16.8%. It recommended approval of the revised recommendation to the City Council.

### **DISCUSSION/ANALYSIS:**

Projects that are submitted to the City are required to be evaluated for impacts under existing CEQA law. The City desires to establish thresholds for determining the impact for CEQA and to determine any local traffic operations and safety issues. The recommendations in the attached Resolution will establish the thresholds for both transportation environmental impacts under CEQA and the local transportation operational assessment required by the City. Once adopted, the process and thresholds for reviewing and preparing these two analyses will be detailed in the City's Transportation Study Guidelines (TSG) (Attachment B). These guidelines contain the plain language description of how VMT and operational impacts will be evaluated and are based on the recommended thresholds, OPR guidance, and the City's previous traffic impact study guidelines (LOS thresholds) as a measure of impact.

Projects first go through a screening process. Projects not screened out must prepare a full VMT analysis to evaluate project-specific VMT impacts. Projects are also evaluated to determine if an operational analysis is required based on the number of vehicle trips they are expected to generate.

The recommended screening criteria is described below.

## CEQA Screening Criteria

CEQA Guidelines (15063(c)(3)(C), 15128, and Appendix G) allow lead agencies to use impact screening criteria for land use project reviews for CEQA transportation impacts based on the agency-adopted thresholds. A full impact analysis is warranted if a project does not pass an initial screening test. The recommended screening process follows the steps below and is consistent with the recommendations in the OPR guidance.

### *Step 1: Check Project Type*

Certain project types are presumed to have a less than significant transportation 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, and smaller local serving retail or medical office projects that would generally improve the convenience of shopping and meeting daily needs close to home, thereby reducing total vehicle miles traveled in the region. 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 farther away. Resolution 2024-1888 lists the types of uses presumed to have a less than significant impact as their uses are local serving by their nature.

### *Step 2: Check Project Location for Low VMT Area*

Residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact because they will likely have travel patterns similar to existing developments of a similar type. 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 with VMT lower than the baseline VMT. To develop this check, a travel forecasting model was used to measure VMT performance for individual zones based on land use type. Home-based VMT per resident and home-based-work VMT per employee were estimated for each area, and a map was created to represent the results. These maps are shown in the guidelines in Attachment B.

### *Step 3: Check for Transit Priority Area (TPA)*

Projects located within a TPA may be presumed to have a less than significant impact. Transit priority areas are defined as one half-mile from an existing High-

Quality Transit Corridor (15 min headway or better during peak periods) stop or one half-mile around an existing major transit stop such as a Metrolink station or regional bus service stop. The City does not currently have transit services that would qualify as high-quality transit. Therefore, this screening criteria would not apply.

### Land Use Project Thresholds

Projects not meeting the screening criteria above would 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.

Staff recommends using the threshold of 16.8% below baseline VMT to match the County of Los Angeles rather than adopting the state recommended threshold of 15% below base. The 16.8% threshold is aligned with the surrounding unincorporated county areas and other agencies in the region and state.

### Mitigation

A project that would result in a significant VMT impact (using the screening described above) would be required to implement Transportation Demand Management (TDM) to reduce the VMT below the established threshold. Strategies that may be considered on a project-by-project basis may include, but are not limited to, the following:

- Diversifying land use to capture trips internally
- Improving pedestrian networks and connections
- Implementing neighborhood traffic management infrastructure
- Building bicycle network improvements
- Installing workplace bicycle storage, lockers, and shower facilities
- Requiring telecommuting and alternative work schedules
- Providing commute-based ride-share programs such as carpooling and vanpooling
- Subsidizing non-vehicle commute trips

Any recommended mitigation measures would be included in the City's review and project evaluation process and subject to City Council approval.

### Mitigation Monitoring

The City will have to develop a VMT mitigation monitoring program to periodically review the mitigation measures established by the development and determine compliance. This would require additional work 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 the number of vehicle trips
- Reviewing subsidy payments

This could be handled through a self-certification submittal to the City in a pre-determined time frame, and City staff would confirm the effects of the mitigation measures. If the mitigation measures were not effective or not being followed, staff would work with the development to address the deficiencies.

### 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 is presumed to have less than a 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 that connect to regional networks and add to the through capacity of the system

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

#### Traffic Operational Impacts

Based on the newly adopted General Plan and Circulation Element, the previously existing intersection level of service (LOS) thresholds will be used to evaluate traffic operational impacts of development. Any potential impacts identified through this process will be considered during the discretionary conditional approval process by the Planning Commission and City Council. These thresholds are restated in the attached Resolution, match the thresholds in the previous General Plan, and are consistent with the language of the recently approved General Plan Update. This assessment would be essentially unchanged from current City practice.

#### **FISCAL IMPACT/SOURCE OF FUNDING:**

No fiscal impacts are associated with the approval of the transportation analysis thresholds.

#### **REQUESTED ACTION:**

Approve attached Resolution No. 2024-1888 establishing transportation impact thresholds related to transportation analysis.

#### **ATTACHMENTS:**

Attachment A: Resolution No. 2024-1888  
Attachment B: Local Transportation Study Guidelines