SB 743 CEQA Guidelines
Transportation Metric Update

Governor’s Office of Planning and Research
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
Problems with LOS

3. LOS mitigation is itself problematic
   - Reducing project size pushes development to worse locations
   - Widening roadways worsens livability, induces vehicle travel

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

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
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
Released:

Preliminary Discussion Draft of Updates to the
CEQA Guidelines Implementing SB 743

Download at opr.ca.gov

• Proposed Metric for CEQA Transportation Analysis: VMT
• Continued analysis of impacts resulting from transportation
  – Noise
  – Air Quality
  – Safety
• Delay would no longer be an impact under CEQA
  – “A project’s effect on automobile delay does not constitute a significant environmental impact”
Land Use Projects

- Current: LOS on local intersections and highway segments

- Proposed: Full extent of VMT loaded onto the roadway network
Transit and Active Transport Projects

- Current: Transit, active transportation projects slow automobile traffic, trigger LOS “impact to transportation”
- Proposed: Transit, active transportation presumed to reduce VMT unless demonstrated otherwise
Roadway Expansion Projects

• Current: LOS impacts at nearby intersections from rerouted/induced vehicle travel
  (Also: Induced VMT analysis required for GHG calculation)
• Proposed: Induced (or reduced) VMT
Safety

Potential safety issues

• Increase exposure of cyclists and pedestrians (e.g. remove facilities, increase crossing distances)
• Queues extending into the mainline
• Speed differentials (<15 mph)
• Increased motor vehicle speeds
• Increased distance between bike or ped crossings
• Changes pertain to CEQA. Jurisdictions maintain option of using LOS under their police power, e.g.
  – General plans
  – Zoning code
  – Fee programs

• Statewide shift from LOS to VMT because, though OPR looked broadly, we didn’t find a geography or project type for which LOS achieved statutory and other state interests better than VMT
VMT Connection to Environment, Health, Cost

Environment
- Emissions
  - GHG
  - Regional pollutants
- Energy use
  - Transportation energy
  - Building energy
- Water
  - Water use
  - Runoff – flooding
  - Runoff – pollution
- Consumption of open space
  - Sensitive habitat
  - Agricultural land

Health
- Collisions
- Physical activity
- Emissions
  - GHGs
  - Regional pollutants
- Mental health

Cost
- Increased costs to state and local government
  - Roads
  - Other infrastructure
  - Schools
  - Services
- Increased private cost
- Housing supply/demand mismatch → future blight
Modeling VMT

• Sketch models
  – For land use projects & land use plans
  – Approximately two dozen currently available, some free and downloadable
  – Rapid improvement

• Travel demand models
  – For transportation projects & land use projects
  – Recent state investment

• Both used for GHG analyses for several years
Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing SB 743 available at opr.ca.gov

• Please share comments!
  – Comment period through October 10, 2014
• Next: OPR incorporates comments, submits to Resources Agency for formal rulemaking process
• Expect guidelines to complete rulemaking process in early 2015
• 120 day grace period for lead agencies to adopt
• Applies prospectively
• Proposed phase in period:
  – Initial implementation in TPAs, opt in elsewhere
  – Statewide starting January 2016
Thanks!

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