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**Title:** Consideration of a Resolution Establishing Local Transportation Impact Analysis (TIA) Guidelines Including "Vehicle Miles Traveled" Thresholds of Significance in Compliance with Senate Bill 743 and the California Environmental Quality Act (Community Development Director Tai).  
ADOPT RESOLUTION NO. 20-0124

**Sponsors:**

**Indexes:**

**Code sections:**

**Attachments:** 1. Resolution No. 20-0124, 2. Draft TIA Guidelines

Date	Ver.	Action By	Action	Result
11/4/2020	1	City Council Regular Meeting		

**TO:**  
Honorable Mayor and Members of the City Council

**THROUGH:**  
Bruce Moe, City Manager

**FROM:**  
Carrie Tai, AICP, Community Development Department Director  
Erik Zandvliet, T.E., City Traffic Engineer

**SUBJECT:**  
Consideration of a Resolution Establishing Local Transportation Impact Analysis (TIA) Guidelines Including "Vehicle Miles Traveled" Thresholds of Significance in Compliance with Senate Bill 743 and the California Environmental Quality Act (Community Development Director Tai).  
**ADOPT RESOLUTION NO. 20-0124**

**RECOMMENDATION:**  
Staff recommends that the City Council adopt a Resolution establishing Local Transportation Impact Analysis (TIA) Guidelines including "Vehicle Miles Traveled" Thresholds of Significance in compliance with Senate Bill 743 and the California Environmental Quality Act.

**FISCAL IMPLICATIONS:**  
There are no fiscal implications associated with the recommended action.

**BACKGROUND:**  
Senate Bill 743 (SB 743) was passed by the legislature and signed into law by the Governor in the fall of 2013. It took effect throughout California on July 1, 2020. This legislation changed the way that transportation impacts are measured under the California Environmental Quality Act (CEQA). Prior to

SB 743, CEQA transportation studies were based on roadway and intersection operations expressed in terms of level of service (LOS), which measures delay at intersections and road segments. Pursuant to SB 743, CEQA transportation studies must now be based on vehicle miles traveled (VMT) which measures the amount of vehicle mileage generated by a project. This change was made to bring CEQA transportation studies into alignment with statewide initiatives to reduce greenhouse gas emissions, reduce sprawl, encourage infill developments, and promote the implementation of multimodal transportation networks.

Prior to these changes to CEQA, the City followed the Los Angeles County Congestion Management Program (CMP) Guidelines for Transportation Impact Analysis to determine CEQA related transportation related impacts for land development. The CMP Guidelines used a LOS-based impact criteria for the purposes of CEQA.

The Governor's Office of Planning and Research (OPR) formally adopted SB 743 into the CEQA Guidelines (Government Code Section 15064.3) on December 28, 2018. OPR released their "*Technical Advisory on Evaluating Transportation Impacts in CEQA*" at this same time. (Available online at <http://opr.ca.gov/ceqa/updates/sb-743/>) The CEQA Guidelines identifies automobile VMT as the most appropriate metric for transportation impact analysis for land use projects and requires lead agencies to start using VMT impact analysis after July 1, 2020. SB 743 also applies to transportation infrastructure projects, although agencies were given flexibility in determining the performance measure for these types of projects as long as their determination is consistent with the CEQA Guidelines Section 15064.7 and supported by substantial evidence.

CEQA guidelines do not modify the discretion lead agencies have to develop their own methodologies or guidelines, or to analyze impacts to other components of the transportation system, such as walking, bicycling, transit, and safety. SB 743 does not prohibit use of delay or other analysis metrics for applications other than CEQA, or even for non-transportation impacts in CEQA. Such studies are useful when considering issues such as intersection lane assignments, signal/traffic control warrants, signal timing, operational analysis, and in some cases are needed for assessing air quality, noise, safety, and energy impacts of a project. This interpretation is supported by Public Resources Code Section 21099.

On May 15, 2018, the City adopted the Manhattan Beach Mobility Plan, which updated the Circulation, Neighborhood Traffic Intrusion, Parking, and Bicycle Networks chapters of the Infrastructure Element of the General Plan. The Mobility Plan seeks to provide for a balanced, safe, multi-modal transportation system to meet the needs of all users, including motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation. It reflects an evolution away from an auto-centric perspective towards Complete Streets and Living Streets concepts, such as those identified and adopted in the California Complete Streets Act (California AB 1358) and the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The City's Mobility Plan acknowledges the need to reduce VMT and shift from short automobile trips to biking, walking and use of public transit in order to reduce greenhouse gas emissions and improve public health.

The City receives and processes approximately six TIAs related to development projects each year, pursuant to previous CEQA requirements. This rate will likely decline to about four TIAs per year, primarily due to categorical exemptions for local serving retail projects that generate lower daily VMT.

## **DISCUSSION:**

The City has established these TIA Guidelines to reflect and enact current State and local land use goals, policies and requirements. Specifically, the TIA Guidelines help to support the goals and policies in the City's General Plan Mobility Element:

Goal I-1: Provide a balanced, safe, and efficient multi-modal transportation system that serves the mobility needs of all community members, including children, seniors, and the disabled.

Goal I-2: Move commuter traffic through the City primarily on arterial streets and collector streets, as appropriate, to protect other streets from the intrusion of cut-through traffic.

In addition, the TIA Guidelines conform to the requirements of SB 743. These TIA Guidelines are also compliant with CEQA Guidelines revisions (California Code of Regulations Section §15064.3), and OPR's Technical Advisory.

Other State and regional goals supported by these TIA Guidelines include the following:

- California Global Warming Solutions Act (Assembly Bill 32)
- Sustainable Communities and Climate Protection Act of 2008
- California Complete Streets Act (Assembly Bill 1358),
- SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- Los Angeles County Metro Long Range Transportation Plan (LRTP)

## General Steps

A Transportation Impact Analysis (TIA) is a technical document prepared by a transportation professional to assess the potential for development projects, land use plans and/or infrastructure projects to impact the transportation system. The City of Manhattan Beach generally requires the preparation and submission of a TIA for discretionary planning projects that meet one or more screening criteria that indicate that project may potentially increase VMT above a certain threshold, or may not be consistent with a with the City's Mobility plan or other regional transportation plan. (Screening criteria is detailed below.)

When a TIA is required, a project applicant will follow these general steps:

Step 1. Project Memo - The project applicant shall inform the *City Traffic Engineer* that a new TIA is being prepared. This memo shall include a detailed project description and site plan with sufficient information to prepare an initial assessment of potential impacts.

Step 2. Preliminary Design Review - The project applicant shall consult with City Departments, other agencies and adjacent jurisdictions (e.g., Caltrans, other cities, transit agencies, etc.) that may be affected by site access and travel demands generated by the project to ensure those agencies' transportation-related concerns and issues are properly addressed in the TIA.

Step 3. TIA Scope of Work Document - The project applicant shall prepare and submit a TIA Scope of Work Document to the City Traffic Engineer for approval.

Step 4. Data Collection - The project applicant shall gather qualitative and quantitative data needed

to support the required analyses and components of the TIA.

Step 5. TIA Preparation - The project applicant shall compile and summarize the analysis and findings in a TIA Report, including tables, figures, charts and appendices.

Step 5. TIA Submittal - The project applicant shall submit the completed Draft TIA to City for review and comments, and make revisions as necessary.

Step 6. Mitigation and Monitoring - The project applicant may be responsible for ongoing reporting, depending on the nature of the mitigation measures and corrective actions to be implemented by the project, including Transportation Demand Management (TDM) measures.

## Screening Criteria

According to OPR's recommendations, certain projects would be presumed to have a less than significant effect on VMT due to project size, project location, or project type. These presumptions are largely based on the state's goals related to infill development, active transportation, public health, air quality, and GHG reduction and are consistent with the City's policies and goals. The proposed TIA Guidelines have established screening criteria in the form of questions to determine if a proposed project or plan would be expected to adequately reduce total VMT. The questions are meant to serve as guidance to assess whether further analysis is needed on a project-by-project basis. The screening criteria includes the following categories and questions:

Non-Retail Projects: Does the development project generate a net increase of 110 or more daily vehicle trips? If the answer is no, a less than significant determination can be made, and no further analysis is required.

Retail Projects: Does the project contain retail uses that exceed 50,000 square feet of gross floor area? If the answer is no, a less than significant determination can be made, and no further analysis is required.

Proximity to Transit: Is the project located within a one-half mile radius of a major transit stop or an existing stop along a high-quality transit corridor? If so,

- Does the project have a Floor Area Ratio less than 0.75?
- Does the project provide more parking than required by the City?
- Is the project inconsistent with the SCAG RTP/SCS?
- Does the project replace residential units set aside for lower income households with a smaller number of market-rate residential units?

If all four answers is no, a less than significant determination can be made, and no further analysis is required.

Residential Land Use: Does the development project generate a net increase of 110 or more daily vehicle trips? If the answer is no, a less than significant determination can be made, and no further analysis is required.

Transportation projects: Does the project include the addition of through lanes? If the answer is no, a less than significant determination can be made. Conversely, transportation projects that reduce capacity generally reduce VMT, and are presumed to have less than significant impact. A variety of other transportation projects are listed in the TIA Guidelines that are

categorically exempt from further analysis.

## Thresholds of Significance

Pursuant to the TIA Guidelines, a project would have a potentially significant VMT impact if it meets one or more of the criteria listed below. These impact criteria are based on latest guidance published by OPR and California Air Resources Board (CARB) but their applicability to a specific project shall be justified with substantial evidence and is not presumed to be appropriate for every project.

- Residential Projects. The project's residential VMT per capita would not be 16.8% below the existing residential VMT per capita.
- Office Projects. The project's employment VMT per employee exceeding would not be 16.8% below the existing employment VMT per employee.
- Regional Serving Retail Projects. The project would result in a net increase in existing total VMT.
- Land Use Plans. The plan total VMT per service population (residents and employees) would not be 16.8% below the existing VMT per service population.
- Transportation Projects. The project will increase the project area VMT.
- For other land use types, the City Traffic Engineer will determine which threshold(s) of significance should be applied.

## VMT Methodology

The Southern California Association of Governments (SCAG) has developed a Travel Demand Forecasting Model for the Southern California region, which includes Manhattan Beach. The SCAG RTP/SCS Travel Demand Forecasting Model is capable of analyzing both local and regional trips for a wide variety of land uses. The City Traffic Engineer has determined that this model is suitable and appropriate for use by the City, due to the regional nature of vehicle trips not confined within the City's boundaries, as well as because the model already includes the City's travel demand data. It is also consistent with the methodology used by other local cities and the County of Los Angeles.

To determine a project's VMT, the project's metrics are entered into Travel Demand Forecasting Model by the traffic consultant who is preparing the TIA. The total VMT of the circulation network with the project is compared against conditions without the project for various peak period and days. Other VMT forecasts may also need to be analyzed, including scenarios with mitigation measures or future cumulative conditions.

## Mitigation Measures

In CEQA, significance thresholds are used to determine whether a project has a significant impact on the environment. If there is a potentially significant impact, the lead agency must require feasible mitigation measures that would reduce the impact to below significant levels. If mitigation measures are infeasible, the agency can declare the impact to be significant and unavoidable and issue a statement of overriding considerations so that the project can proceed to implementation.

Mitigation of VMT generated by land development projects is a relatively new concept, although the related concept of Transportation Demand Management (TDM) strategies aimed at reducing VMT and related air quality and GHG emissions has been studied for the past few decades. VMT

mitigation fees, mitigation banks, and mitigation exchange programs are potential future methods for handling mitigation, but a considerable amount of effort is needed to set up these types of programs.

The proposed TIA guidelines identify a list of proven TDM mitigation measures that could be applied to a project that is anticipated to generate a significant environmental impact. Any mitigation measure would have to be supported with substantial evidence that it would be effective in reducing VMT. Some possible VMT reduction strategies include:

- Trip reduction programs with required monitoring
- Ride sharing programs
- Subsidized or discounted transit programs
- Telework and alternate work schedules
- Transit accessibility improvements
- Unbundled parking policies
- Pedestrian network improvements
- Traffic calming measures
- Car sharing and bike sharing programs
- Mixed use projects that reduce external trips
- Other strategies or measures with quantifiable VMT reduction

## **Local Circulation Impacts**

Although SB 743 places an emphasis on VMT for CEQA analysis, transportation analyses based on LOS and delay are still appropriate to analyze local traffic circulation impacts of developments for the purpose of the City's General Plan and other adopted policies. The proposed TIA Guidelines retain the general CMP based criteria and significance thresholds currently used by the City to analyze a project's conformance to local and regional policies and goals. In addition, an increase in vehicle stacking or delay in travel lanes is considered a potential significant impact to the local roadway network.

For local circulation analysis, the developer would work with the City Traffic Engineer to determine the study area and parameters under which to conduct this portion of the TIA. AM and PM peak periods of nearby intersections would normally be studied, as well as traffic volumes on surrounding local streets. The analysis then follows industry-standard guidelines to calculate project trip generation, trip distribution, existing levels-of-service and future conditions with and without the project. Mitigation measures may be required to reduce any identified significant impacts or project elements that do not conform to adopted policies. Construction-related traffic impacts are also analyzed for the project.

The TIA Guidelines add screening criteria and analysis to determine if local residential cut-through traffic would be generated by the project. If confirmed, the applicant would be required to prepare a Neighborhood Traffic Management Plan (NTMP), and be responsible for implementing it.

## **Site Access Analysis**

The TIA Guidelines also require a project applicant to assess the project's private access points and internal circulation, particularly if the proposed access is on a residentially oriented street and/or if the proposed land use would be expected to generate any onsite vehicle stacking. Also, inadequate

parking or traffic conditions due to special events or operations may need to be analyzed. Recent changes from LOS to VMT does not affect this requirement.

**CONCLUSION:**

Effective July 1, 2020, Senate Bill 743 (SB 743) requires the use of a VMT metric instead of automobile delay (LOS) to determine transportation impacts of land use developments, land use plans and transportation projects for the purposes of CEQA. The City has prepared local TIA Guidelines to comply with current State mandates, as well as to facilitate the implementation of regional and local land use goals, policies and requirements. Staff recommends adoption of the attached Resolution to establish a local standardized guideline for use in analyzing potential traffic impacts of land development and transportation projects within the City.

**PUBLIC OUTREACH:**

The City maintains a database of developers and builders in the City, and has reached out with mailed notices and emails to make them aware of the availability of the draft TIA Guidelines and of this meeting.

**ENVIRONMENTAL REVIEW:**

The City has reviewed the proposed project (TIA Guidelines) for compliance with the California Environmental Quality Act (CEQA) and has determined it to be Categorically Exempt under CEQA Guidelines Section 15308 (Actions by Regulatory Agencies for the Protection of the Environment), Class 8, as they involve regulatory procedures for protection of the environment in compliance with State mandates under SB 743 and CEQA.

**LEGAL REVIEW:**

The City Attorney has approved the proposed Resolution as to form. The City Attorney has reviewed and TIA Guidelines and determined that no additional legal analysis is necessary.

**ATTACHMENTS:**

1. Resolution No. 20-0124
2. Draft TIA Guidelines