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June 8, 2017

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: Transportation Committee

Dear Honorable Members:

UPDATE ON CITY ADOPTION OF NEW TRANSPORTATION EVALUATION METRICS IN COMPLIANCE WITH SB 743; CF 14-1169

The following report is an update on the City's progress relative to compliance with Senate Bill (SB) 743.

BACKGROUND

In 2013, the Governor signed into law Senate Bill (SB) 743, which requires the Governor's Office of Planning and Research (OPR) to develop alternative methods to measure transportation impacts under the California Environmental Quality Act (CEQA). On December 30, 2013, OPR published a technical memorandum that identified benefits of alternative evaluation criteria. In August 2014, OPR proposed to replace Level of Service, which measures vehicle traffic flow and delay, with Vehicle Miles Traveled (VMT), which measures miles traveled by vehicles within a specific area. On January 20, 2016, OPR released for public review a revised proposal for changes to the CEQA Guidelines which reinforce Vehicle Miles Traveled as the primary metric for transportation performance and include new threshold recommendations better aligned with California's long-term greenhouse gas emission reduction goals.

The Office of Planning and Research granted agencies a phase-in period of two years to comply with a Vehicle Miles Traveled-based metric, allowing agencies ready for the change to implement immediately. Statewide, cities including Pasadena, Santa Monica, and San Francisco have updated their project evaluation metrics to use Vehicle Miles Traveled. The City of Los Angeles is in the process of updating metrics ahead of the State's deadline. In August 2014, Councilmember Mike Bonin introduced a motion directing the Department of City Planning (DCP) and Department of Transportation (LADOT) to prepare for the shift to Vehicle Miles Traveled (CF

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14-1169). DCP subsequently contracted with Fehr and Peers to develop the strategy and methodology to establish the tools to bring the City into compliance with the State mandate.

Direction to the Office of Planning and Research on CEQA Guidelines

DCP and LADOT support the Office of Planning and Research's "Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA", in which the Office of Planning and Research recommended that Vehicle Miles Traveled replace Level of Service as the transportation review criteria in the CEQA process statewide. Regionally, a collection of cities and agencies are urging the Office of Planning and Research to maintain Level of Service as the transportation metric in suburban areas with less access to transit. However, DCP and LADOT believe this approach would conflict with the Office of Planning and Research's own finding that Vehicle Miles Traveled better aligns with environmental outcomes and the State's climate reduction policies. In addition, maintaining two separate review criteria would lead to a confusing analytical framework, given that the City contains both transit accessible areas and suburban areas with less access to transit, and would result in legal uncertainty.

DISCUSSION

SB 743 initiated a significant shift in planning practitioners' and policymakers' understanding of the relationship between land use, transportation and the environment. The legislation seeks to correct the unintended consequences of measuring impacts through Level of Service. Often this evaluation approach disincentivized development in dense areas of the City and in many ways encouraged more sprawling development patterns through mitigation measures that increased road capacity by constructing wider streets and more turning lanes, further exacerbating congestion.

The State's proposal instead supports better land use decisions, improving accessibility for all travel modes and increasing sustainable travel mode share as a means to reduce Vehicle Miles Traveled. Reductions in Vehicle Miles Traveled would reduce transportation related emissions, improve mobility options, and enhance quality of life. The change explicitly recognizes that sustainable travel modes have less-than-significant impacts under CEQA to facilitate public transportation and active transportation projects. The proposal encourages local jurisdictions to mitigate transportation impacts with measures that support more diverse transportation choices. These new types of mitigations can result in streets with safer pedestrian crosswalks, curb extensions to create shorter crossing distances, improved bus stops, dedicated transit lanes, etc.

As a first step in preparing for the shift to a Vehicle Miles Traveled centric analysis, staff updated the City's Travel Demand Forecasting Model to reliably predict Vehicle Miles Traveled in Los Angeles. The City updates its model about every five years with an emphasis on changing traffic volumes. For the purposes of evaluating vehicular miles traveled, the updated Travel Demand Forecasting Model takes into account the influence of demand management strategies, active transportation modes, and changing travel behavior trends as well as the latest socioeconomic data from the SCAG 2016 Regional Transportation Plan. Using robust data sources, the City's Travel Demand Forecasting Model can accurately estimate transportation impacts through Vehicle Miles Traveled.

The City collected primary local trip generation data to inform new trip generation rates. Traditionally, transportation evaluation has relied on trip rates from the Institute of Transportation Engineers (ITE) Trip Generation Handbook to estimate the amount of driving associated with

each land use category. These existing national trip generation rates reflect decades-old suburban settings and may not accurately predict trip patterns in Los Angeles. For example, empirical research has found marked differences in driving and transit utilization based on income, however affordable housing trip generation rates are not currently captured in ITE rates.

City staff recognizes the need for locally-accurate travel data and tasked Fehr and Peers to collect trip data from ten mixed-use and office sites and 42 affordable housing sites to inform new local trip generation rates. The results confirm that driving rates for mixed-use and affordable housing projects are less than estimated by ITE trip generation rates. Additionally, demand for parking at these sites is lower than the City's standard parking requirements, especially for affordable housing projects. LADOT has incorporated trip data collected at permanent supportive housing sites into the City's updated Transportation Impacts Study Guidelines, published in December 2016.

The proposed Project Evaluation Model incorporates new local trip generation rates and the latest socioeconomic data from the City's Travel Demand Forecasting model to estimate Vehicle Miles Traveled reduction. The evaluation framework would evaluate proposed projects' Vehicle Miles Traveled impacts for project level analyses. It takes into account land use characteristics, mixed-use trip internalization, area demographics, transit proximity, and additional factors (Figure 1).

The Project Evaluation Model evaluates the significance of a project's Vehicle Miles Traveled based on the project site's context. Projects in a low density, transit inaccessible setting would generate different Vehicle Miles Traveled than projects in a higher density location near major transit connections. The City would measure a project's impact relative to its surroundings, accounting for the diverse neighborhoods within the City of Los Angeles.

All areas of Los Angeles, even where Vehicle Miles Traveled is greater than the City's average, are already generating lower Vehicle Miles Traveled per capita than the SCAG region (Figure 2). Since the City has achieved below-regional-average Vehicle Miles Traveled, staff proposes to compare project-related Vehicle Miles Traveled to impact criteria based on Area Planning Commission (APC) Vehicle Miles Traveled average. The City would evaluate projects' Vehicle Miles Traveled based on a reduction target of 15% below the Area Planning Commission area average (Figure 3).

Projects required to meet a Vehicle Miles Traveled reduction target of 15% below the Area Planning Commission region can select from an updated menu of mitigation options proven to lower Vehicle Miles Traveled featured in the Project Evaluation Model. Vehicle Miles Traveled reduction strategy options in the Project Evaluation Model include the following Transportation Demand Management (TDM) categories (Figure 1):

- Parking
- Transit
- Education and encouragement
- Commute trip reduction
- Shared mobility

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- Bicycle infrastructure
- Neighborhood enhancement

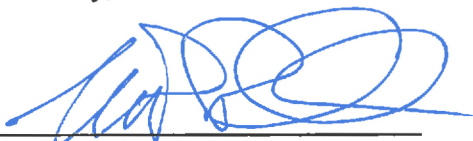
Specific Transportation Demand Management strategies can include project features and building occupant benefits that encourage sustainable transportation such as transit passes, carpooling, childcare, and other options that lead to tangible benefits for neighborhoods and advance the City's multimodal transportation goals. In a parallel effort, staff are drafting a new TDM ordinance that would encourage behavior shift towards other transportation options in new residential and office development.

DCP and LADOT will continue to engage relevant staff, transportation practitioners, and public stakeholders to provide information on changes to transportation evaluation methods and associated outcomes. Previous efforts include a panel discussion with transportation evaluation experts, Transportation Demand Forecasting training sessions for Staff, and informational presentations to stakeholder groups, including the Central City Association, the Live.Ride.Share forum, Young Professionals in Transportation, state and local government agencies, and other industry practitioners.

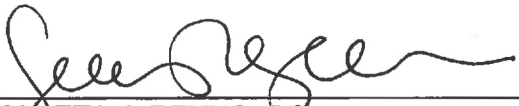
Program Phase In and Next Steps

Beginning in July 2017, the public will be able to download a beta version of the Project Evaluation Model. On July 10, 2017, the City will host an open house to provide Project Evaluation Model training for City development review staff and transportation practitioners who perform project Vehicle Miles Traveled impact analysis for land use projects. Staff will post resources online for public information, including brochures, step-by-step presentations, and reference material. In Fall 2017, Staff will present the CEQA Appendix G environmental checklist update at City Council, leading to the adoption of the new Vehicle Miles Traveled-based thresholds and its subsequent incorporation into the City's CEQA Threshold Guide in 2018. Following adoption, projects must comply with the updated transportation evaluation framework, bringing the City into compliance with the State mandate.

Sincerely,



VINCENT P. BERTONI, AICP
Director of Planning
Department of City Planning



SELETA J. REYNOLDS
General Manager
Los Angeles Department of Transportation

CITY OF LOS ANGELES PROJECT EVALUATION MODEL

Project Information

Project: 3900 Figueroa Street
Scenario: Scenario 1
Address: 34.013966,-118.262315

Site Developed Area: 4.477 Acres
Land Use Type: Retail | General Retail

Land Use Type	Value	Unit
Housing Multi-Family	408	DU
Housing Hotel	100	Rooms
Housing Motel	138	Rooms
Retail General Retail	37	kaf
Retail High-Turnover Sit-Down Restaurant	11.0	kaf
Retail Quality Restaurant	10.4	kaf
Office General Office	20.4	kaf

TDM Strategies

Select each section to show individual strategies
Use ☒ to denote if the TDM strategy is proposed part of the project or is a mitigation strategy.

Parking

☒ Proposed Pr
☐ Mitigation

☒ Reduce Parking Requirements
20
city (ade parking provision for the project site

☒ Proposed Pr
☐ Mitigation

☒ Unbundle Parking
15
actual parking provision for the project site

☒ Proposed Pr
☐ Mitigation

☒ Express Park Coordination / Market Rate Street Parking
125
monthly parking cost for the project site

☒ Proposed Pr
☐ Mitigation

☒ Express Park Coordination / Market Rate Street Parking
-8%
percent increase in on-street parking spaces (min 21%, max 50%)

☒ Proposed Pr
☐ Mitigation

☒ Parking Cash-Out
7
percentage of employees eligible

☒ Proposed Pr
☐ Mitigation

☒ Priced Workplace Parking
\$3.00
daily parking charge

☒ Proposed Pr
☐ Mitigation

☒ Priced Workplace Parking
25%
percentage of employees subject to priced parking

☒ Proposed Pr
☐ Mitigation

☒ Residential Area Parking Permits
\$200
cost of annual permit

Transit

☒ Education & Encouragement
☒ Commute Trip Reductions (CTR)
☒ Shared Mobility
☒ Bicycle Infrastructure
☒ Neighborhood Enhancement

Analysis Results

Daily Miles Traveled

Proposed Project	With Mitigation
6,042 Daily Vehicle Trpc	3,891 Daily Vehicle Trpc
44,799 Daily VMT	28,845 Daily VMT
7.4 Household VMT per Capita	4.8 Household VMT per Capita
11.3 Work VMT per Employee	7.2 Work VMT per Employee
20,857 Retail VMT	13,429 Retail VMT

Significant VMT Impact?

Household: Yes	Household: No
Threshold = 6.2 15% Below APC	Threshold = 6.2 15% Below APC
Work: No Threshold = 11.8 15% Below APC	Work: No Threshold = 11.8 15% Below APC

Figure 1: City of Los Angeles Project Evaluation Model

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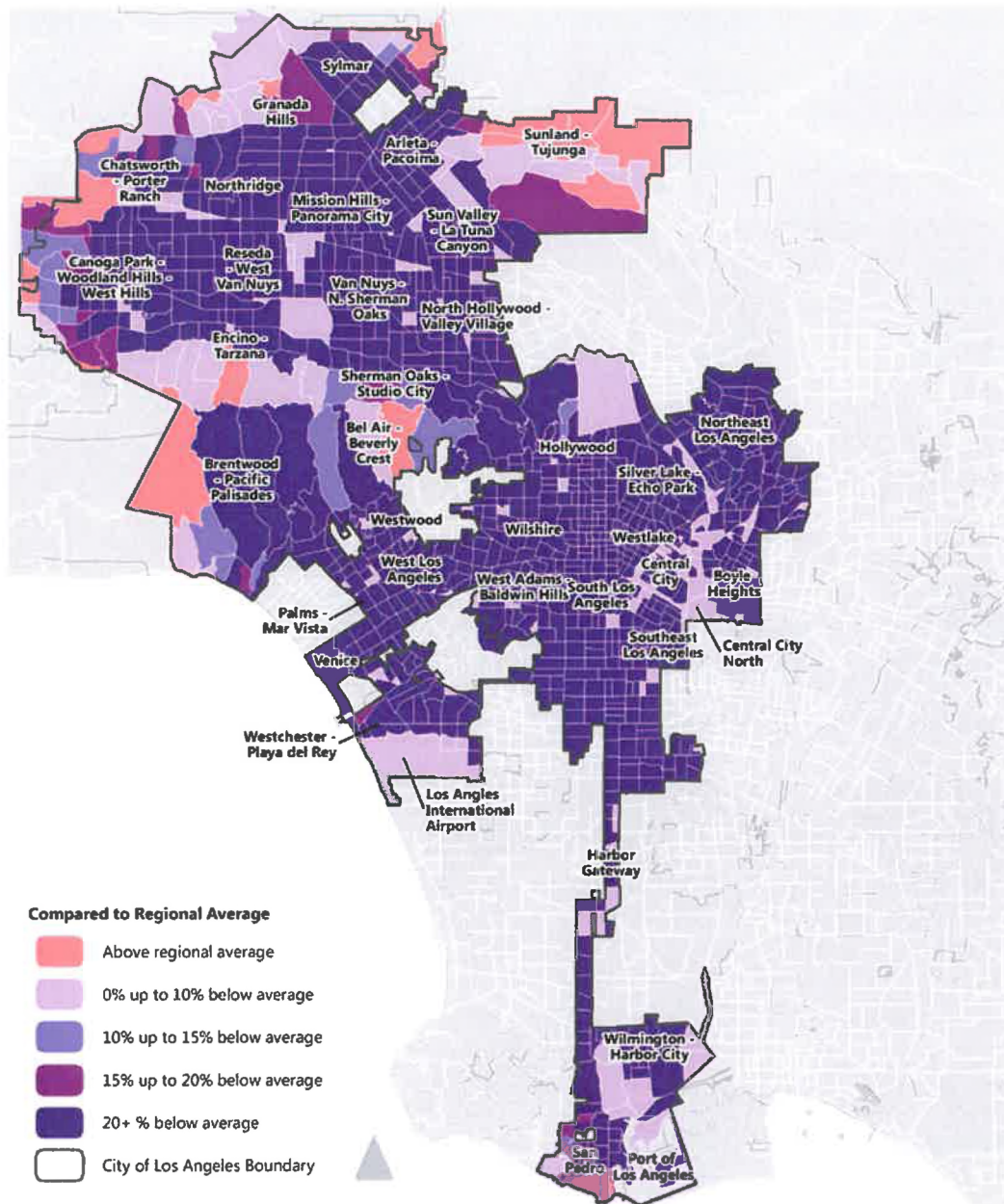


Figure 2: Area-specific VMT impact criteria compared to regional average

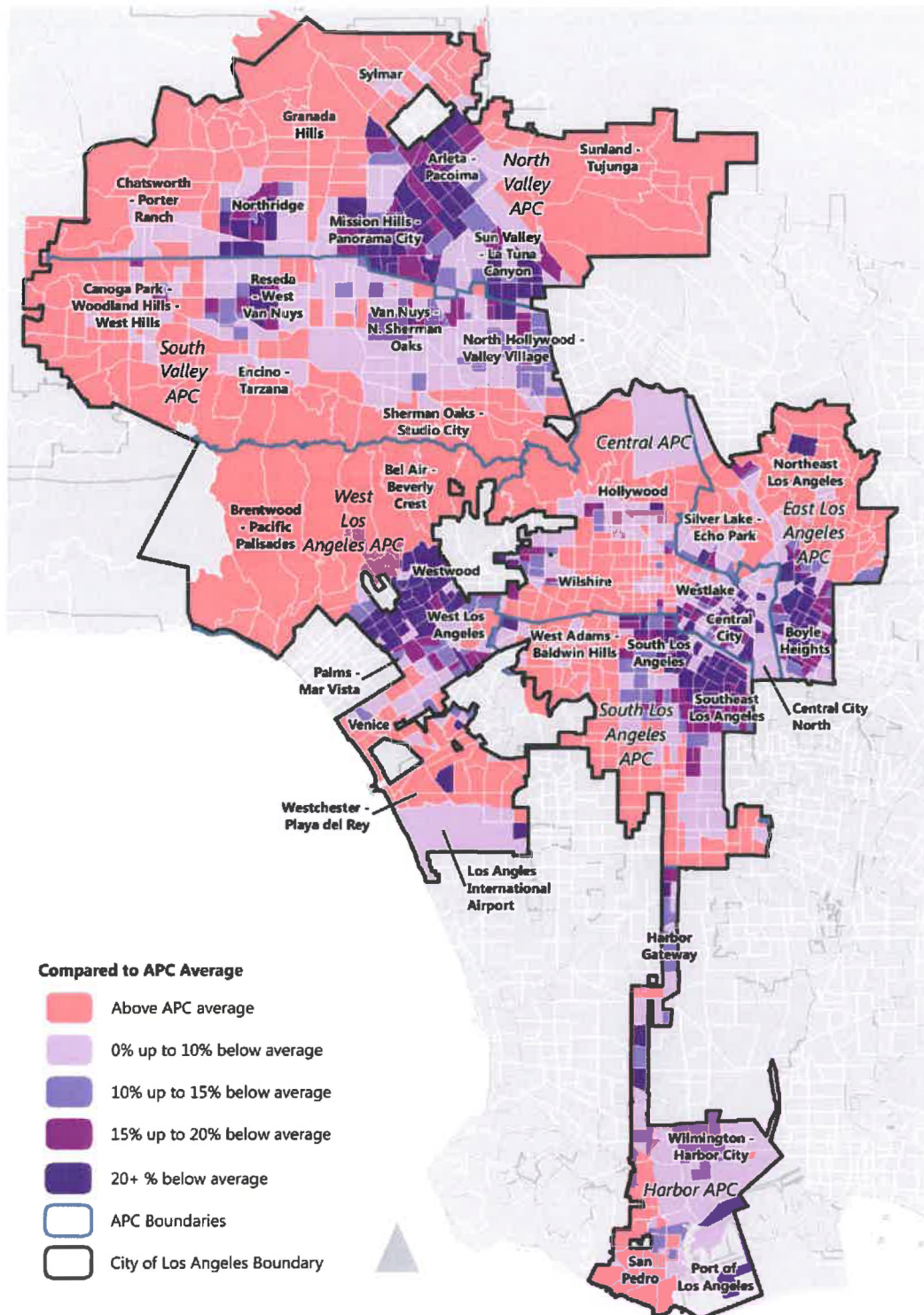


Figure 3: Area-specific VMT impact criteria compared to APC average