**CITY OF LOS ANGELES**
INTER-DEPARTMENTAL CORRESPONDENCE

Date: September 16, 2020

To: Honorable City Council
c/o City Clerk, Room 395, City Hall
Attention: Honorable Mike Bonin, Chair, Transportation Committee

From: Seleta J. Reynolds, General Manager
Department of Transportation

Subject: **FIRST ANNUAL REPORT BACK ON CEQA TRANSPORTATION SECTION UPDATE IMPLEMENTING SENATE BILL 743 (CF 14-1169; CPC-2018-6577-MSC)**

## SUMMARY

As directed by the Los Angeles City Council on July 30, 2019, this report responds to Council File 14-1169 and summarizes activities in the first year following adoption of the transportation analysis procedures that are mandated by Senate Bill 743.

## RECOMMENDATION

RECEIVE and FILE this report.

## BACKGROUND

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law and initiated a process to change transportation impact analysis procedures to comply with the California Environmental Quality Act (CEQA). In August 2014, the Governor's Office of Planning and Research (OPR) proposed to replace level of service (LOS) with vehicle miles traveled (VMT), an estimate of the average amount and distance people drive by vehicle to reach a destination. The updated CEQA Guidelines became effective on December 28, 2018.

Since Governor Brown signed SB 743, and in response to direction from the City Council (CF 14-1169), LADOT partnered with the Department of City Planning (DCP) to modernize the City's CEQA transportation analysis procedures and establish transportation thresholds and guidelines that meet the intent of SB 743 and advance City environmental goals. On February 28, 2019, the City Planning Commission (CPC) unanimously acted to recommend that the City Council adopt new transportation impact thresholds.

On June 25, 2019, the Transportation Committee unanimously recommended that the City Council adopt two resolutions, the first updating citywide CEQA thresholds and the second opting out of the regional Congestion Management Program. The Transportation Committee instructed LADOT and DCP to report back annually for two years on the status of the implementation efforts and required updates. On July 30, 2019, the City Council unanimously adopted the Transportation Committee's report and resolutions.

**DISCUSSION**

In accordance with SB 743 and new State guidelines, the updated CEQA transportation thresholds and procedures, adopted July 30, 2019, replaced decades-old processes. LADOT and a consultant team created VMT calculation tools that allow for iteration and the incorporation of new information, as supported by evidence, to more accurately estimate a project's travel patterns.

In the first year of implementation, LADOT updated review procedures and demonstrated its commitment to a process that can evolve based on feedback and substantiated by data. We updated LADOT's Transportation Assessment Guidelines, which establish criteria for project review and set standards for preparation of a transportation assessment in the City of Los Angeles, twice since the adoption of VMT to include additional guidance on evaluating hillside impacts for land use development, revising the method to evaluate constraints to pedestrian access, and defining the method to evaluate VMT impacts of community plans. The memo in Attachment A, which LADOT released in June 2020, includes guidance on hillside impacts as well. The VMT Calculator versions 1.2 and 1.3 incorporated new user friendly features, minor calculation adjustments, new VMT mitigation strategies, and updated data. As of August 31, 2020, approximately 891 people have downloaded the VMT Calculator and receive notification when guidelines and tools are updated.

Status Update

Between August 1, 2019 and July 31, 2020, the City received approximately 128 transportation impact studies for land use proposals (**Attachment B**), 50 fewer than in the same time period of the prior year. A few factors may have influenced this change in the number of studies submitted to LADOT. Primarily, the years leading to adoption of the new thresholds represent an economic upturn after the 2008 economic crash. Accordingly, development applications increased in the years between 2011-2019. Additionally, LADOT and DCP worked closely with stakeholders and the practitioner community to develop updates to comply with State law. The City made applicants aware of anticipated changes to policy, likely leading to a spike in application submissions prior to adoption as a risk aversion tactic. Concurrently, the City of Los Angeles adopted many other policy changes, further influencing applicants' decision making around timing. Finally, the COVID-19 pandemic was likely a factor in a slow down in transportation study submissions in the last quarter of Fiscal Year 19/20.

While the volume of studies may have decreased following the adoption of the updated thresholds, staff analysis indicates that the adoption may have reduced the proportion of projects with significant and unavoidable transportation impacts that require an EIR with a Statement of Overriding Considerations. In the calendar year prior to adoption, between August 1, 2019 and July 31, 2020, approximately 28 projects (or 15.7% of projects) required mitigation of transportation impacts. Of those projects, 11 (or 6.2%) had unmitigatable transportation impacts (**Attachment C**). Comparatively, in the year following adoption, between August 1, 2018 and July 31, 2019, approximately 23 projects (or 17.9% of projects) required mitigation. Of those projects, three (or 2.3%) had unmitigatable impacts. These findings support OPR's selection of VMT as the metric of analysis for transportation in order to more directly address environmental impacts of transportation and land use projects and plans, in addition to the various other benefits of measuring VMT as substantive by OPR, including links climate, human health, and the environment.

Phase-In Plan

In consultation with the City Attorney's Office, LADOT developed a phase-in plan introduced at stakeholder outreach meetings during the Fall 2018 open house meetings, shared in communications, and disclosed in the previous report adopted by City Council. The phase-in plan states that all development projects that submitted entitlement applications after July 30, 2019 must rely on VMT analysis. The City permitted developers that submitted their applications prior to the July 30, 2019 adoption date to continue relying on their existing traffic studies that evaluated projects under the former delay-based methodology, as long as project approval pre-dated July 1, 2020, which is the State's deadline for required compliance by all projects. LADOT updated the phase-in plan during the COVID-19 pandemic to account for the unprecedented circumstances.

Response to COVID-19 Pandemic

When the "Safer at Home" public orders took effect, LADOT transitioned from in-person development review appointments to virtual, providing continued support to practitioners and developers in a safe, distanced manner in line with public health guidance. LADOT revised the above discussed phase-in plan to account for unforeseen circumstances. In a memo released on April 17, 2020, LADOT extended the mandated date for projects that had previously prepared a traffic study and were able to demonstrate that delays in receiving final entitlements were a result of COVID-19 pandemic-related circumstances (**Attachment D**). The memo also provided guidance for collecting and estimating existing traffic count data during the "Safer at Home" order.

Statewide Collaboration

The City of Los Angeles adopted the shift to VMT analysis one year ahead of the required State deadline. Since adoption, LADOT and DCP have continued collaboration with jurisdictions within California through the California City Transportation Initiative (CaCTI) network, with jurisdictions within Los Angeles County, and with Los Angeles County Metropolitan Transportation Authority (Metro). City staff have shared research, tools, presentations, reports, and lessons learned with countless jurisdictions in the process of adopting their own thresholds. Simultaneously, LADOT has partnered with the Southern California Association of Governments (SCAG) to apply for and receive grant funding to develop a regional VMT Exchange Program that can increase opportunities for mitigation, especially in less dense communities not well served by transit. LADOT coordinated closely with a consortium of transportation consultant firms, DCP, and the City Attorney's Office to develop a memo released May 1, 2020, which presents interim guidance for evaluating freeway safety analysis for land use development projects (**Attachment E**). LADOT presented the Interim Guidance for Freeway Safety Analysis memo to Caltrans headquarters and District 7 staff to help inform Caltrans' development of a statewide method to evaluate freeway safety for land use development projects. LADOT, in coordination with DCP and CaCTI cities, also reviewed and provided comments to OPR and the Natural Resources Agency in their development of statewide VMT guidance throughout the SB 743 rule-making process.

Recognition

The City of Los Angeles received the SCAG 2020 Sustainability Award of Merit in the Efficient and Sustainable Land Use category and the American Society of Civil Engineers (ASCE) 2020 Outstanding Urban and Land Development project. The City of Los Angeles was recognized for its achievements in

adapting to SB 743 a year ahead of schedule and for undertaking a process that goes above and beyond the required mandate. To make this important transition, the project team completed unprecedented efforts in collecting local data to understand the travel characteristics in Los Angeles needed to establish the tools to estimate project-level VMT results. Staff recognized that appropriate significance criteria must account for the various and unique geographic characteristics of different communities in the City, resulting in the adoption of various VMT significance thresholds based on averages within the seven Area Planning Commissions. LADOT worked with DCP and the consultant team at Fehr & Peers to develop the VMT Calculator to assist development projects and LADOT staff in estimating project-level household VMT per capita and VMT per employee. The VMT Calculator measures whether a development project exceeds VMT significance thresholds and the potential VMT reductions available from a menu of transportation demand management strategies. We conducted extensive research to identify the transportation measures that can mitigate VMT impacts and to quantify the benefits of these measures.

Congestion Management Program

In conjunction with adopting new thresholds and procedures to comply with SB 743, LADOT provided recommendations regarding Congestion Management Program (CMP) requirements under Title 7, Division 1, Chapter 2.6 of the Government Code. In order to further align transportation monitoring practices with State goals to support sustainable land use patterns and reduce greenhouse gas emissions, LADOT recommended opting out of the CMP as the responsible agency for reporting. This recommendation was consistent with the Metro Board action initiating the process for Metro and all Los Angeles County jurisdictions to opt out of the CMP, in accordance with State CMP statute. Following the action of the Los Angeles City Council, the Metro Board voted to dissolve the CMP program for Los Angeles County (**Attachment F**).

Future Updates & Resource Needs

In the coming year, LADOT will initiate a process to update the citywide travel demand forecasting (TDF) model. The City last updated the TDF model in 2016. It is customary to update the citywide model on a 4-year cycle, following the update of the SCAG Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal, approved on September 3, 2020. The citywide TDF model update process refines the extensive SCAG area model with more granular information at the city scale, providing an opportunity to incorporate robust data sources, including data from on-street loop detection, cell phone, and navigation-based location services. Subsequently, LADOT will also update the VMT Calculator, which derives trip length data at the level of transportation analysis zones (TAZ) from the TDF model.

As mentioned previously, LADOT has partnered with SCAG to study ways to increase mitigation options including developing a VMT Exchange or Bank, similar to a Cap and Trade program for VMT credits.

Finally, LADOT and DCP are collaborating closely to update the Transportation Demand Management (TDM) ordinance. This update will modernize the existing TDM ordinance, offering more development projects a greater array of transportation demand strategies that can reduce VMT, improve air quality and improve access to mobility options and opportunity. A critical component of the TDM ordinance update is the development of a robust monitoring program that will create a transparent process for applicants, staff, and the public.

**FISCAL IMPACT**

No impact to the City's General Fund is anticipated by this action.

SJR:tc/rg

Attachments

Attachment A: LADOT Transportation Assessment Guidelines Addendum – Hillside Developments

Attachment B: Completed Transportation Impact Studies

Attachment C: Comparison of Studies with Unmitigatable Transportation Impacts

Attachment D: Pandemic-related updates to LADOT's Transportation Assessment Requirements

Attachment E: LADOT Transportation Assessments Interim Guidance for Freeway Safety Analysis

Attachment F: LA Metro Communications re: Dissolving the Congestion Management Program

# CITY OF LOS ANGELES
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June 16, 2020

Transportation Engineering and Planning Consultant Firms

**Subject: LADOT Transportation Assessment Guidelines Addendum – Hillside Developments**

To better address safety, access, and circulation concerns related to construction activities of new developments on narrow streets within hillside neighborhoods, the Los Angeles Department of Transportation (LADOT) releases this addendum to the LADOT Transportation Assessment Guidelines (TAG). This addendum provides guidance when considering traffic management measures for hillside development projects in narrow roadways of less than 24-feet in width.

While most hillside developments screen out of a Vehicle Miles Traveled analysis according to the TAG, these projects may still require CEQA analysis to address potential geometric design hazards or emergency access concerns, or may require a safety and access assessment outside of the CEQA process to consider how the construction activities impact local circulation, emergency access, deliveries, and street parking.

**HILLSIDE DEVELOPMENT CONSTRUCTION TRAFFIC MANAGEMENT GUIDELINES**

In hillside communities, where streets are narrower than 24 feet, two vehicles traveling in opposite directions cannot pass concurrently when there is parking, obstructions, or construction-related activities on one side of the street. This raises safety concerns and can impede access of other residents, deliveries, and emergency vehicles. In areas classified as "Very High Fire Hazard Severity Zones," this is a significant concern for fire emergency personnel and in the event a neighborhood evacuation is needed.

To address these concerns, new land use development projects requiring discretionary entitlements proposed in hillside communities on streets less than 24-feet wide (on any roadway segment used by the project for hauling materials and equipment) should develop a Traffic Management Plan (Plan) that identifies measures to offset access, circulation, and parking issues for LADOT review and approval. Land use development projects proposing interior alterations or minor additions of 1,000 square feet or less are exempt from this requirement. Projects undergoing new construction or additions of more than 1,000 square feet shall prepare a Plan that considers the cumulative effects that the Project and other known development activities (by-right and discretionary) within a one-half mile radius of the Project that could have overlapping construction schedules would have on emergency access, deliveries, residential circulation, and street parking.

The applicant should work with the Department of City Planning to collect information on the other known development activities within a one-half mile radius of the project site. To offset any expected adverse conditions, the Plan must be developed for LADOT review and approval prior to the completion of the project's environmental analysis. The Plan should identify measures that will be implemented by the applicant to minimize the hours of construction impacts. Once approved by LADOT, the terms of the Plan will be shared with the Department of City Planning to be formalized as conditions of approval or as project mitigation measures.

To inform the terms of the Plan, a review and analysis of the roadway characteristics should be submitted, including roadway widths, existing parking demand, and weekday roadway volumes (8 AM to 6 PM). The area of analysis must capture the roadway characteristics of the entire route used for hauling materials and equipment within the hillside area. Additionally, when considering the cumulative effects of other known construction activities in the neighborhood, the Plan should include, but not be limited to, the following design elements and measures:

- safety features (warning & regulatory signs, channelizing devices like cones or other delineators, guard rails, barriers, changeable message signs, etc.)
- flagger control
- temporary parking restrictions
- reduction in the construction duration
- minimize the time that construction vehicles are parked in the public right-of-way
- detours
- sidewalk and street lighting needs
- designing for appropriate vehicular speeds and sight lines
- employee staging (off-site parking) and shuttles
- on-site parking
- coordination with other construction sites in the area
- consideration of additional measures in Very High Fire Severity Hazard Zones

The terms of the Traffic Management Plan should be imprinted on all plans reviewed by the Department of Building and Safety, provided and required of any contractor(s), and included in the engineering notes of any street use permits that may be required by StreetsLA (Bureau of Street Services). Please note that this requirement is now in effect and will be included in the upcoming update of the LADOT Transportation Assessment Guidelines.

If you have any questions, please email Eddie Guerrero at eddie.guerrero@lacity.org or me at tomas.carranza@lacity.org.

Sincerely,

Tomas Carranza, PE
Principal Transportation Engineer

c: Kathryn Phelan / John Fox, City Attorney's Office
Lisa Webber / Jane Choi, LA City Planning
Eddie Guerrero / Jesus Serrano, LADOT

**Attachment B**:

Comparison of transportation impact studies completed in each LADOT Development Review Office and by Area Planning Commission (APC), in the one year pre-adoption and the one year post adoption

| **Pre Adoption: 8/1/2018 to 7/31/2019** | | | | |
|---|---|---|---|---|
| **APC** | Metro | Valley | West LA | **Total** |
| Central | 69 | 0 | 0 | **69** |
| East Los Angeles | 15 | 0 | 0 | **15** |
| Harbor | 3 | 0 | 5 | **8** |
| North Valley | 1 | 14 | 0 | **15** |
| South Los Angeles | 18 | 0 | 0 | **18** |
| South Valley | 0 | 26 | 0 | **26** |
| West Los Angeles | 2 | 0 | 23 | **25** |
| Outside City | 2 | 0 | 0 | **2** |
| **Total** | **110** | **40** | **28** | **178** |
| | | | | |
| **Post Adoption: 8/1/2019 to 7/31/2020** | | | | |
| **APC** | Metro | Valley | West LA | **Total** |
| Central | 65 | 0 | 0 | **65** |
| East Los Angeles | 7 | 0 | 0 | **7** |
| Harbor | 0 | 0 | 6 | **6** |
| North Valley | 0 | 8 | 0 | **8** |
| South Los Angeles | 13 | 0 | 0 | **13** |
| South Valley | 1 | 14 | 0 | **15** |
| West Los Angeles | 0 | 0 | 14 | **14** |
| Outside City | 0 | 0 | 0 | **0** |
| **Total** | **86** | **22** | **20** | **128** |

**Attachment C**:

Comparison of Studies with Unmitigatable Transportation Impacts

| Pre Adoption: 8/1/2018 to 7/31/2019 | | |
|---|---|---|
| **Office** | **No. of Projects requiring mitigation(s)** | **No. of Projects with unmitigatable impact(s)** |
| Metro | 20 | 11 |
| Valley | 6 | 0 |
| West LA | 2 | 0 |
| **Totals** | **28** | **11** |

| Post Adoption: 8/1/2019 to 7/31/2020 | | |
|---|---|---|
| **Office** | **No. of Projects requiring mitigation(s)** | **No. of Projects with unmitigatable impact(s)** |
| Metro | 15 | 1 |
| Valley | 6 | 2 |
| West LA | 2 | 0 |
| **Totals** | **23** | **3** |

# CITY OF LOS ANGELES
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May 1, 2020

Transportation Engineering and Planning Consultant Firms

**Subject: LADOT Transportation Assessments - Interim Guidance for Freeway Safety Analysis**

On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the State's California Environmental Quality Act (CEQA). This was required by Senate Bill (SB) 743 and the adoption of Section 15064.3 to the CEQA Guidelines. SB743 also provided that the change from delay, as described by level of service (LOS), to VMT analysis as the CEQA metric does not relieve a public agency of the requirement to analyze a project's potential significant impacts related to air quality, noise, safety, or any other impact associated with transportation. The purpose of this memorandum is to provide interim guidance on the preparation of freeway safety analysis for land use proposals that are required by LADOT to prepare a Transportation Assessment.

**BACKGROUND**

This freeway safety analysis interim guidance will help address the recent comment letters sent by Caltrans District 7 to the Department of City Planning on development project environmental documents. In these letters, Caltrans requested that environmental analyses for new land use development projects include freeway off-ramp safety considerations. Specifically, they requested that the City evaluate a development project's effects on vehicle queuing on freeway off-ramps. Such an evaluation would measure a project's potential to lengthen a forecasted off-ramp queue and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline.

In order to respond to these comment letters in absence of published guidelines by Caltrans that evaluate safety concerns on freeways, the City of Los Angeles Department of City Planning, in collaboration with LADOT and the Los Angeles City Attorney's Office, convened a Freeway Analysis Technical Working Group that included transportation engineering, planning, and environmental firms with a long history of preparing transportation analyses in Southern California. The goal of this Working Group was to establish interim guidance on how transportation assessments for land use proposals should review and analyze potential safety impacts on the freeway system. The Working Group, which met weekly throughout the month of April 2020, developed the steps described below to conduct a freeway safety analysis to determine if a project may potentially result in off-ramp queuing and differential travel speeds that could constitute a potential safety impact under CEQA.

The Working Group included staff from LADOT, the Department of City Planning, Los Angeles City Attorney's Office, and the following consultants:

- Cambridge Systematics, Inc.
- Gibson Transportation Consulting, Inc.
- Fehr & Peers
- Hirsch/Green Transportation Consulting, Inc.
- Iteris, Inc.
- Linscott, Law & Greenspan, Engineers
- The Mobility Group
- Overland Traffic Consultants
- Rincon Consultants, Inc.

It should be noted that new Caltrans Transportation Study Guidelines are expected to be released later this year to meet the State's deadline of July 1, 2020, which requires all California agencies to comply with SB743. Caltrans announced that their new guidelines will include a State Highway System safety analysis section. Therefore, the City's interim guidance is expected to be revisited once Caltrans releases the State guidelines to determine if changes are necessary.

**FREEWAY SAFETY ANALYSIS STEPS**

Effective immediately, land use development projects within the City of Los Angeles that are required to prepare a transportation assessment shall conduct a freeway safety analysis as follows:

1. Identify the number of Project trips expected to be added to nearby freeway off ramps serving the site. If the Project adds 25 or more trips to any off ramp in either the morning or afternoon peak hour, then that ramp should be studied for potential queueing impacts following the steps below. If the project is not expected to generate more than 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required.

2. Using Synchro analysis software, or similar tools, prepare a queuing study for the "Future with Project" conditions for the proposed project build-out year. LADOT's Transportation Assessment Guidelines provide recommended steps to forecast future traffic volumes.

3. To evaluate the adequacy of the existing and future storage lengths, use the 95$^{th}$ percentile queue provided from the Synchro results worksheet, and use 100% of the storage length on each lane of the ramp from the stop line to the gore point. If an Auxiliary Lane exists, add 50% of the length of the auxiliary lane to the ramp storage area.

4. If the Project traffic is expected to cause or add to a queue extending onto the freeway mainline by less than two car lengths, the project would cause a less-than-significant safety impact. If the queue is already extending or projected to extend onto the freeway mainline, and the Project increases the overflow onto the mainline lanes by less than two car lengths, the project would cause a less-than-significant safety impact. If the Project adds two or more car

lengths to the ramp backup that extends to the freeway mainline, then the location must be tested for safety issues which include a test for speed differential between the off-ramp queue and the mainline of the freeway during the particular peak hour.

5. The speed differential would identify the operating speed of the freeway mainline lanes during the peak hour that corresponds to the peak hour during which the ramp is expected to experience project-related queue overflow. Caltrans Performance Measurement System (PeMS) data should be used to identify freeway operating speed(s) during the peak hour being analyzed. If reliable PeMS data are not available at the subject location, other sources of speed data including location-based services data from available sources could be used.

6. If the speed differential between the mainline lane speeds and the ramp traffic is below 30 mph, the project would be considered to cause a less-than-significant safety impact.

7. If the speed differential is 30 mph or more, then there is a potential safety issue. To offset this potential condition, the project should consider the following preferred corrective measures:

    a. Transportation demand management program(s) to reduce the project's trip generation,

    b. Investments to active transportation infrastructure, or transit system amenities (or expansion) to reduce the project's trip generation, and/or

    c. Potential operational change(s) to the ramp terminal operations including, but not limited to, lane reassignment, traffic signalization, signal phasing or timing modifications, etc. This option requires coordination with Caltrans and LADOT to assess feasibility and for approval of the proposed measure(s).

    A physical change to the ramp itself (addition of auxiliary lane, ramp widening, etc.) may be considered. However, this change would have to demonstrate substantial safety benefits, not be a VMT-inducing improvement, and not result in other environmental issues.

8. If the cost of the physical change to the ramp is substantial, then a fair-share contribution to the improvement may be required if necessary requirements are met, including, but not limited to, Caltrans defining the improvement cost, and opening a Project File/Project Account to accept a financial contribution for the improvement. If required, the Applicant would pay the Project's fair-share of the improvement cost, and the fair-share contribution would be deposited in the Project Account to be used for the identified improvement.

We understand that Caltrans' direction on evaluating transportation impacts under CEQA continues to evolve. Relevant State documents are being drafted for release later this year, including a VMT-focused Transportation Impact Study Guide that guides Caltrans comments on land use project EIRs of local agencies, and a Transportation Analysis Framework that addresses how Caltrans evaluates the CEQA impacts of capacity-increasing projects on the State Highway System (SHS). While we look to these guidance documents to inform our methodology of safety impacts on freeway facilities, we release this

interim guidance to inform practitioners on the technical approach, developed by the Working Group that can be applied to project-level Transportation Assessments immediately.

If you have any questions, please email me at tomas.carranza@lacity.org or call me at 213-435-4056.

Sincerely,

Tomas Carranza, PE
Principal Transportation Engineer

c: Kathyrn Phelan / John Fox, City Attorney's Office
Lisa Webber / Arthi Varma / Luci Ibarra, DCP
Rubina Ghazarian / Eddie Guerrero / Jesus Serrano, LADOT

**Attachment 1**

Freeway Safety Analysis Working Group

Findings

The City of Los Angeles formed a Working Group made up of City staff and transportation engineering and planning consultants to develop a policy to respond to Caltrans' requests that off-ramp safety considerations be included in the environmental analyses for new development projects. While SB 743 calls for the inclusion of safety considerations, Caltrans District 7 verbal and written comments focus on the potential backup of off-ramps onto the mainline freeway lanes as their primary safety concern.

Since Caltrans has not established a methodology or thresholds based on substantial evidence, the Working Group was tasked with developing a freeway safety analysis based on research, local traffic conditions, and best practices. The Working Group met weekly during the month of April 2020 to share research into the number of project trips that should constitute a threshold for triggering an off-ramp investigation, the issue of speed differential and its relationship to freeway safety, the ability to collect reliable mainline freeway speed data, and a study process to identify freeway locations where queuing and speed differential is a concern that should be addressed.

**RECOMMENDED POLICY DRAFT**

The recommendations by the Working Group, which are summarized in the cover memorandum, were developed based on research, a review of best practices, and an analysis of local data. The first step was to determine when an off-ramp near a proposed project should be studied. The consultants participating in the Working Group researched their previous project transportation assessments to identify the level at which project-related traffic can cause traffic to back up onto the freeway. From these case studies, over 100 off-ramps were evaluated and it was determined that very few of these locations were expected to result in queues extending onto the freeway. So, this is not a common occurrence.

Project trips added to an off-ramp varied between one trip and over 100 trips per hour. Very rarely did an evaluated off-ramp result in a projected back-up onto the mainline.

<u>Screening Threshold</u>

The Working Group recommended a screening threshold of 25 or more project trips during a peak hour assigned to an off-ramp as the threshold for selecting that off-ramp for further study. The consultants on the Working Group cited inconsistencies in the direction given by Caltrans District 7 for different projects. In one case, a large land use proposal near the junction of two major downtown freeways was estimated to generate over 800 trips in each of the peak hours. Caltrans requested the analysis of up to 16 interchange ramps. During the project traffic assignment, the project was expected to generate 25 or more peak hour project trips at only four of the off-ramps. A screening threshold of 25 or more project trips was identified by the Working Group as a reasonable threshold to measure those ramps

where congestion already exists, while eliminating the locations where the addition of fewer project trips is not expected to cause a backup onto the freeway.

Speed Data Source

The Working Group discussed the premise that a queue extending onto the freeway mainlines is a safety concern when the speed on the freeway was high enough to potentially lead to a collision because freeway mainline traffic did not have enough time to stop safely. So the group discussed how to consistently determine the actual operating speed of the mainline of a particular freeway, in the appropriate direction, during the affected peak hour. Two data sources were discussed: Caltrans Performance Measurement System (PeMS) data and big data platforms that aggregate location based services data such as StreetLight Data, NPMRDS, or other available sources.

The group agreed that the needed speed data can be collected from PeMS - a source managed by Caltrans. PeMS data can be obtained in graphic and tabular formats which make it easy to identify the mainline speed at the correct spot on the freeway during the right hour in the appropriate direction. The group determined that for some of the freeways with relatively less traffic (e.g., SR 170), there were freeway segments where the data points were less robust. Freeway segments near Downtown Los Angeles, Hollywood, and the West side did not have this problem.

Speed Differential

The Working Group evaluated the amount of speed differential that could be used to define a safety issue. A freeway mainline operating at slow speeds during the peak hour did not present the safety concerns compared to a mainline operating at higher speeds.

Research revealed hundreds of studies related to speed differential analyses with not much agreement on their effects on safety. However, the research did yield information on the severity of collisions at varying speeds. The two most relevant studies suggested 30 mph as the critical speed differential level that would apply to freeway segments. The Caltrans Design Manual does not provide Decision Sight Distance readings for speeds less than 30 mph, implying that speeds less than 30 mph may not be an issue on freeway segments.

According to the Texas Transportation Institute: "Drivers are usually aware that they are closing in on a slower vehicle; however, if there is a large speed differential (over 25 mph) they often have a very poor perception of just how quickly they are closing in until they get very close to the slower vehicle. Often that can be too late, especially when the faster vehicle is a heavy vehicle that needs more room to brake. The slower vehicles risk getting rear-ended; the faster ones risk being cut off by turning or lane-changing drivers who think they have an adequate gap in traffic but do not."

Based on this literature research, the Working Group selected 30 mph as the speed differential included in this interim guidance. At less than 30 mph, the stopping sight distance related to driver's perception and reaction times is much lower, thereby minimizing the potential for a collision.

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August 28, 2019

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**RE: Dissolution of the Congestion Management Program in Los Angeles County**

Dear Seleta Reynolds:

The purpose of this letter is to notify you that the County of Los Angeles and a majority of cities in the county, which in total represent a majority of the population in the county, have elected to be exempt from the Congestion Management Program (CMP), which means the provisions of the CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County.

On June 28, 2018 the Metro Board approved a staff recommendation to initiate the process for Metro and all Los Angeles County local jurisdictions to opt out of the CMP in accordance with state law. Over the following year staff conducted outreach meetings directly with cities, through and with, Councils of Governments and at city council hearings. The outreach revealed a strong preference among cities to opt out of the CMP

Fifty-seven local jurisdictions, which in total represent 8.5 million in population have now adopted resolutions electing to be exempt from the Congestion Management Program (CMP). California Government Code §65088.3 provides that jurisdictions within a county may opt out of the CMP requirement without penalty, if a majority of local jurisdictions representing a majority of a county's population adopt resolutions requesting to opt out of the program. With the Los Angeles County region now having reached and exceeded this statutorily required threshold, the provisions of the CMP are no longer applicable to the region. Metro staff has communicated this information to our Board and have also sent notification to the State Controller, the California Transportation Commission and the Office of Planning and Research.

For your local jurisdiction that means you are:

- No longer required to prepare CMP biennial Highway Monitoring Reports
- No longer required to prepare CMP annual Local Development Reports
- Conformance with the CMP is no longer an eligibility requirement to participate in the Metro Call for Projects or any other discretionary funding program

- Transportation Demand Management Ordinances that local jurisdictions adopted to conform with the CMP remain your local ordinance to retain or augment to meet your local needs
- CMP Traffic Impact Analysis (TIA) is no longer required in Environmental Impact Reports (EIR)
- Local jurisdictions will continue to receive Section 2105 gas tax funds

There are a number of cities that are in various stages of preparing to take a CMP opt-out resolution to their governing body. Metro welcomes the continued adoption of resolutions for our records but please note that any future resolutions are not necessary at this point.

The collective majority decision to opt out of the CMP applies to all 89 jurisdictions in Los Angeles County regardless of whether or not a jurisdiction adopted an opt-out resolution. Similarly, as noted above, all local jurisdictions will continue to receive Section 2105 gas tax funds regardless of whether their jurisdiction adopted an opt-out resolution.

Metro staff remain available to respond to any inquiries you may have in regards to this matter. Should you have any questions please contact Paul Backstrom by email backstromp@metro.net or by phone at 213.922.2183.

Sincerely,

Kalieh Honish
Executive Officer

# CITY OF LOS ANGELES
CALIFORNIA

**SELETA J. REYNOLDS**
GENERAL MANAGER

**ERIC GARCETTI**
MAYOR

**DEPARTMENT OF TRANSPORTATION**
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(213) 972-8470
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April 17, 2020

Transportation Engineering and Planning Consultant Firms

**Subject: Pandemic-related updates to LADOT's Transportation Assessment Requirements**

Due to the ongoing "Safer at Home" public order related to the COVID-19 pandemic, LADOT announces the following changes and updates related to: project scoping meetings, traffic data collection, VMT Calculator Version 1.3, non-CEQA topics, and the deadline to revise LOS-based transportation studies to comply with the statewide transition to VMT.

1. Project Scoping Meetings
   All interactions with LADOT development services staff related to the review of transportation assessments shall be processed remotely - from initial project scoping sessions to submittals of final transportation assessments. Please continue to work with the appropriate office and the LADOT staff assigned to your project via emails, phone calls or video conferencing until the end of the "Safer at Home" public order when normal working conditions are restored. Review fees can be processed online at:

   https://ladot.lacity.org/businesses/fees#pay-environmental-and-construction-fees

   All of LADOT's development review services, including project condition clearances, building permit sign-offs, and reviews of proposed site plans and project-related improvements, are available using the online resources at:

   https://ladot.lacity.org/businesses/development-review

2. Traffic Data Collection
   As is clearly evident by travel behavior during the pandemic, the majority of Angelenos are following State and local directives to stay home. With schools switching to remote learning and commuters to teleworking, there are dramatic changes in travel demand volumes and patterns on all roadways throughout the state. As a result, vehicle and transit travel demands have been significantly reduced. The COVID-19 pandemic introduces a new level of uncertainty into traffic analysis.

   Therefore, please note that LADOT will not accept transportation assessments that use traffic counts collected starting on March 1, 2020 until the end of the "Safer at Home" public order. Nonetheless, the current inability to collect field data that is representative of normal conditions should not

prevent the progression of transportation assessments. LADOT will work with you to consider new methods to estimate typical traffic conditions to ensure that transportation assessments proceed. Please work with the lead LADOT reviewer assigned to your study to assess and evaluate the best approach to estimate existing traffic conditions. The use of historic counts with the application of an adjustment factor is an acceptable method. If historic data is not available, we will work with you to establish other technical approaches to estimate typical traffic conditions.

3. VMT Calculator Version 1.3

   LADOT appreciates the feedback that many of you have provided on your experiences using the VMT Calculator and the new guidelines. Some of that feedback has prompted us to make additional adjustments to the calculator to enhance and modify the tool in order to add new features and incorporate the latest available substantiated information. The new version will incorporate more detailed information on travel mode splits and transit ridership to predict site level VMT with greater precision. VMT Calculator Version 1.3 should be ready for release by June 2020. An updated version of the Transportation Assessment Guidelines is also underway.

4. Non-CEQA Topics: Measuring Circulation, Access, and Safety

   Impact analysis based on vehicular delay such as the level of service (LOS) methodology is no longer, on its own, a significant impact under the California Environmental Quality Act (CEQA). However, the Governor's Office of Planning and Research (OPR) affirms that local governments have the authority, such as through site plan review, to use their police powers to require operational analyses to support findings that advance public health, safety, and welfare. LADOT has the authority through entitlement review to assess projects and provide recommended conditions of approval for public health, safety, and welfare as they relate to transportation impacts.

   To provide a standardized process for this operational analysis review, the Transportation Assessment Guidelines (TAG) include a new non-CEQA section that addresses methods to evaluate operational deficiencies and clarifies the City's ability to impose corrective conditions on new developments to address site access, circulation, and safety challenges, especially for the most vulnerable road users. In such instances, LADOT will establish, through a transportation assessment report, the appropriate nexus and substantiate why such conditions are needed to satisfy the necessary findings to support the Department of City Planning's recommendations, or the Director's decisions.

   It should also be noted that under SB743, to the extent that vehicular delay would result in a secondary impact to safety, such impacts would need to be further evaluated to determine if the impacts would be considered potentially significant under CEQA and if additional mitigation would be required.

5. LOS-Based Transportation Studies

   Immediately after adoption of the City's VMT-based Thresholds on July 30, 2019, LADOT announced that Memorandums of Understanding (MOUs) executed before the new guidelines were adopted would continue to be processed even if based on a LOS analysis (see attached memo for reference). LADOT stressed that these projects should include a VMT analysis to appropriately disclose all information required by CEQA in the event that the project does not receive its entitlements prior to July 1, 2020, which is the State's official deadline for required compliance by all projects.

Due to delays in project hearing and decision dates caused by the COVID-19 pandemic, LADOT offers an extension to this deadline for applicants processing LOS-based analyses if it can be demonstrated that their projects were delayed from receiving their final entitlements because of the COVID-19 pandemic. In each case, LADOT will work with the Department of City Planning to verify (i) the existence of a MOU that predated July 30, 2019, (ii) that the appropriate project environmental documentation (Draft EIR, NOI to Adopt MND or ND, or SCEA) has been circulated for public review; and (iii) that a pre-July 1, 2020 decision by the City was likely if not for delays caused by the pandemic. Please note, LADOT reserves the right to require VMT analysis for any environmental clearance if it is determined necessary to comply with applicable law, including based on the administrative record. Note also, this policy does not apply to any project using a categorical exemption. Projects relying on categorical exemptions need to conduct a VMT analysis.

In the instances where traffic studies are in process (with signed MOU's), LADOT will waive additional fees if the VMT analysis requires no mitigation review, otherwise the Technical Study review fee shall be applied. If the VMT analysis also includes a new non-CEQA analysis then a new Traffic Study Review fee will be required.

If you have any questions that are specific to a study that you are currently processing, please contact the appropriate LADOT staff assigned to that study. All other inquiries can be directed to ladot.vmt@lacity.org, David Somers at 213-972-5966, or me at 213-435-4056.

Sincerely,

Tomas Carranza, PE
Principal Transportation Engineer

c: Lisa Webber/Arthi Varma, DCP
Rubina Ghazarian/Eddie Guerrero/Jesus Serrano, LADOT

ATTACHMENT

# CITY OF LOS ANGELES

CALIFORNIA

**SELETA J. REYNOLDS**
GENERAL MANAGER

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August 9, 2019

Transportation Engineering and Planning Consultant Firms

**Subject: City of Los Angeles Adoption of Vehicle Miles Traveled as the Transportation Impact Metric Under the California Environmental Quality Act**

On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the State's California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the CEQA Guidelines. Over the last five years, the Departments of City Planning and Transportation led efforts to facilitate the City's transition to VMT, to prepare new Transportation Assessment Guidelines (TAG) that address these changes, and to revise the Transportation Section to the City's CEQA Threshold Guide. The intent of the SB743 and the subsequent changes to CEQA is to appropriately balance the needs of congestion management with statewide goals related to: the reduction of greenhouse gas emissions, infill development, and the promotion of public health through active transportation.

During the preparation of the new CEQA guidelines, the State's Office of Planning and Research stressed that lead agencies can apply traditional operational analysis requirements to inform land use and transportation-related decisions provided that such analyses were outside of the CEQA process. Therefore, LADOT will continue to require and review a project's site access, circulation, and operational plan to determine if any safety and access enhancements, transit amenities, intersection improvements, traffic signal upgrades, neighborhood traffic calming, or other improvements are needed. When preparing a Transportation Assessment Memorandum of Understanding (MOU), please work with the appropriate LADOT Development Review Office to determine the specific scope and parameters of this non-CEQA analysis.

While the State has replaced delay-based LOS with VMT impact criteria for purposes of CEQA, LADOT remains committed to evaluating the performance of our streets through our development review process. In our review, we rely on comprehensive performance metrics that align with the City's Mobility Plan 2035 to ensure that important safety and accessibility needs are met including critical vehicle queuing, in addition to the environmental goals captured in the new emphasis on VMT. LADOT has reconstituted the new guidance in the newly released TAG, which aims to provide clarity on methodologies, and distinction between impact categories that are required by CEQA from analyses to address access, circulation, and safety concerns.

We understand the new VMT methodology is a substantive change in scope and will likely not be reflected in the traffic studies currently in development. To manage this transition, LADOT will honor

executed MOUs for traffic studies that were processed under the prior LOS-based guidelines; however, we strongly recommend that these projects also evaluate VMT as part of their transportation analysis. The VMT analysis will help guarantee the project discloses the appropriate information as required by CEQA in the event that the project does not receive their entitlements prior to July 1, 2020, which is the State's official deadline for required compliance by all projects. In these instances where we have signed MOUs for traffic studies in process, LADOT will waive additional fees for any rescope, or supplemental analysis that accounts for the new analysis procedures in the TAG.

Please refer to the following resources for more guidance on this transition on the LADOT website by searching 'Modernizing Transportation Analysis', or by selecting the hyperlinked text below:

- Project Frequently Asked Questions
- LADOT project website
- VMT Calculator download form
- LADOT Transportation Assessment Guidelines (TAG)
- Video: Planning News You'll Use - VMT
- Video: Modernizing Transportation Analysis Part 1: Overview
- Video: Modernizing Transportation Analysis Part 2: Deep Dive

If you have any questions that are specific to a study that you are currently processing, please contact the appropriate LADOT staff assigned to that study. All other inquiries can be directed to ladot.vmt@lacity.org, David Somers at 213-972-5966, or me at 213-972-5900.

Sincerely,

Tomas Carranza, PE
Principal Transportation Engineer

c: Rubina Ghazarian, Department of City Planning
Eddie Guerrero, LADOT
Jesus Serrano, LADOT