



SUMMARY

The City of Irvine is updating its California Environmental Quality Act (CEQA) Manual to comply with the State's updated CEQA Guidelines and implement Senate Bill (SB) 743 (Steinberg, 2013). In 2013, the State of California signed SB 743 into law, which requires a shift in the way cities measure environmental impacts. The Office of Planning and Research (OPR) is requiring all cities to measure transportation impacts using vehicle miles traveled (VMT) as the metric to determine the significance under CEQA.

As part of this effort, the City of Irvine is also revising its Traffic Impact Analysis Guidelines for evaluating project-level transportation review to include both the City's existing traffic impact analysis requirements, as well as the new requirements to address SB 743. The City's methodology for evaluating traffic impacts outside of the CEQA requirements will remain unchanged; however, administrative revisions will be proposed to provide further clarification.

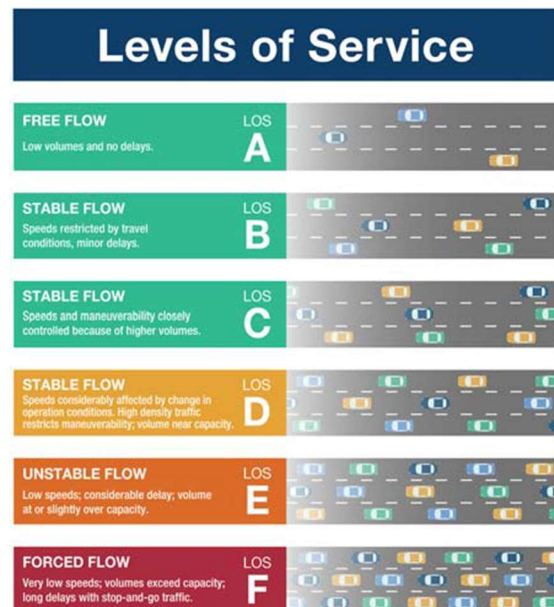
BACKGROUND

The City of Irvine is updating the City's CEQA Manual, including the Traffic Impact Analysis Guidelines, to comply with State legislation (SB 743). State guidelines require all cities to update and implement their primary transportation impact analysis metrics from level of service (LOS) to vehicle miles traveled (VMT) by July 1, 2020. This approach promotes the reduction of greenhouse gas emissions, the development of multimodal transportation networks prioritizing safety and access of all street users, and a diversity of land uses.

FREQUENTLY ASKED QUESTIONS

What is Level of Service and how is it measured?

Level of Service (LOS) is a measure of traffic delay at signalized intersections or roadway segments. LOS rates street operations and traffic flow conditions using a letter-grade system ranging from A, for free-flow conditions with little or no delay, to F, for gridlocked conditions with excessive delays. Increasing the capacity of roadways results in improved LOS.



Source: Utah Department of Transportation



What is Vehicle Miles Traveled (VMT) and how is it measured?

VMT captures the automobile trips generated by a proposed development, multiplied by the estimated number of miles driven for each trip. This figure is divided by the number of residents (VMT per capita) or employees (VMT per employee). Typically, development located further from key destinations, such as job centers or transit, may result in longer driving distance. Development located closer to job centers and transit may result in lower VMT due to shorter driving distances.

Why do the newly-adopted environmental laws require CEQA traffic impacts to be evaluated based on VMT rather than prior LOS?

VMT thresholds were adopted to address traffic impacts with the goal of reducing vehicle emissions by way of optimizing land use planning to promote less dependency on vehicles through job-housing balancing in localized areas. Prior environmental laws addressed traffic impacts with the goal of reducing vehicle emissions by way of improving LOS. The LOS is improved by construction of new roadways or additional capacity on roadways, that in turn, reduces vehicle idling and thereby lowers emissions. The unintended consequence of the LOS methodology is the encouragement of vehicle dependency, thereby increasing vehicle emissions.

What is a discretionary development or land use application?

A discretionary development application is a development proposal that requires approval by the Planning Commission or Zoning Administrator at a public hearing before grading or building permit applications may be submitted and/or approved.

Examples of discretionary development applications include but are not limited to:

- Master Plans (MP), which is required for development of certain sites and land uses in particular zoning districts
- Conditional Use Permits (CUP), which is when a proposed land use is not permitted by right in a particular zoning district as identified in the Zoning Ordinance; and
- Subdivision Maps, which divide land into lots for the purpose of sale, leasing, or financing

Do all projects have to measure transportation-related impacts under CEQA?

All discretionary land use projects will be required to analyze environmental impacts related to transportation (i.e., VMT impact analysis) as part of their environmental review process, unless the project meets any one of the following four screening criteria:

1. The project nets an increase of 250 or less daily trips (ITE-based);
2. The project is located in a High Quality Transit Area (i.e., within half-mile distance of existing rail transit station or located within half-mile of two or more existing bus routes with a frequency of service interval of 15 minutes or less during morning and evening peak hours);



3. Project is locally serving retail (less than 50,000 square feet) or a K-12 locally serving public school; or
4. Project is a 100 percent affordable housing project (Note: If less than 100 percent, the number of affordable units is not subject to VMT impact analysis);

How will a land use project's transportation impacts be measured under CEQA?

For any discretionary land use project that does not meet any of the four screening criteria listed above, a VMT analysis is required.

For a redevelopment project that demolishes existing uses and replaces those uses with new uses, the first step of the VMT analysis will evaluate the net change in city-wide VMT with and without the project under the existing conditions scenario based on the City's traffic model (ITAM TransCAD). If the redevelopment project results in a net decrease in city-wide VMT, then no further VMT analysis is required.

For all projects that require further VMT analysis, the project's resulting city-wide VMT rate will be compared against the applicable city-wide VMT rate threshold goal on a case-by-case basis to determine if a significant impact results:

- For residential projects, the project's Residential VMT per capita rate will be evaluated against the city's Residential VMT per capita threshold goal;
- For non-residential projects (i.e., office, industrial, retail, hotels, hospitals, commercial recreation, university uses), the project's Non-residential VMT per employee rate will be evaluated against the city's Non-residential VMT per employee threshold goal;
- For mixed-use projects that include combinations of residential and non-residential uses, the project will be evaluated case-by-case based on the project's specific land use mix. It may be determined at the staff-level that a project's Mixed-use VMT per service population rate will be evaluated against the city's Mixed-use VMT per service area threshold goal.

What is the definition of "significant impact" and who determines if it is a significant impact?

CEQA Guidelines Section 15382 defines a significant impact (a.k.a., "significant effect on the environment") as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." The level of significance in TIA guidelines is determined by local jurisdictions. In this case, the City Council is responsible for making that determination.

Relative to implementing SB 743, the City is developing significance thresholds for VMT as part of the CEQA Manual update process. The VMT significance thresholds will be adopted by the City Council and discretionary development applications from that point forward will need to either demonstrate project compliance with the significance threshold or implement



mitigation measures to the degree needed to meet the significance threshold (so the impact becomes less than significant). The decision-making body responsible for reviewing the proposed project application ultimately determines what a significant impact is through the CEQA review process based on the adopted significance thresholds.

How were the CEQA impact criteria thresholds determined for land use projects?

OPR recommends setting the significant impact criteria threshold for residential and office projects to 15% below the existing VMT per capita of the region; however, City of Irvine is considering a recommendation of up to 10% below existing conditions for each of the three threshold goals based on traffic model testing of General Plan land uses. Specific values for the thresholds under consideration will be provided to stakeholders once finalized.

How can a project with a significant transportation impact mitigate VMT impacts?

If a proposed project exceeds the significant impact criteria threshold, a list of mitigation measures will be available.

These mitigation measures are selected based on available evidence of demonstrated ability to reduce VMT. Examples of measures include transit incentives, improved neighborhood connectivity, and shared mobility options. Values of each mitigation measure strategy being considered by the City will be provided to stakeholders once determined by staff.

How does this affect projects that have initiated or are going through the entitlement process?

For projects already in their entitlement process and with a signed memorandum of understanding (MOU) with City of Irvine, the developer has the option to prepare the VMT impact analysis in addition to the required transportation LOS analysis approach for the proposed project. All land use development projects must measure transportation-related CEQA impacts with VMT starting on July 1, 2020, as required by state legislation.

Will projects that do not have transportation VMT impacts be required to make improvements?

Projects that have impacts in other CEQA categories outside of the transportation section will have to mitigate impacts in each respective category.

Projects will be required to assess potential effects on roadways and intersections based on the LOS methodology as defined in the TIA Guidelines. Consistent with the current TIA Guideline methodology, improvements will be required to bring affected intersections and roadways back to acceptable LOS or pre-project conditions should the baseline condition be deficient.

Improvements may also be required if the project contributes to potential circulation and access deficiencies that require specific operational improvements to meet the applicable Transportation Design Procedures (TDPs). The LOS analysis of roadway conditions and the



evaluation of TDPs are in addition to the evaluation of appropriate pedestrian, bicycle, and transit connectivity in the project vicinity as defined in the TIA Guidelines, and is in addition to the review that is required under CEQA.

Will level of service still be measured?

Yes. A project that meets the criteria for preparation of a traffic study as defined in the TIA Guidelines must prepare a traffic study that analyzes the project's contribution to LOS on the roadway system, operational characteristics as defined in the TDPs, as well as evaluation of pedestrian, bicycle, and transit connectivity. This is the level of analysis required by the City and is required outside of CEQA review to identify circulation and access deficiencies.

Does my ability to engage in land use and transportation decisions change?

No. The City's planning process will continue to allow and encourage community members to weigh in on development and transportation projects through existing venues and methods, including opportunities to provide comments, speak at public meetings and hearings, and contact elected representatives on proposed discretionary development applications.

What other cities have updated their CEQA evaluation process to include vehicle miles traveled (VMT) as a transportation performance metric?

The cities of Pasadena, San Francisco, Oakland, San Jose, and Los Angeles have adopted VMT as the new metric for analyzing transportation impacts. All California cities must update the way transportation impacts are analyzed under CEQA before the deadline of July 1, 2020.

When would the updates go into effect?

The updated CEQA Manual, including the updated TIA Guidelines, are expected to be presented before the City Transportation Commission, Planning Commission, and City Council in early 2020. Following adoption, there will be a phase-in period for projects that have already initiated their environmental review process prior to July 1, 2020.

Where can I learn more?

Additional information and upcoming meeting dates are available at www.cityofirvine.org/CEQA.

Who should I send my questions, comments, suggestions and/or feedback related to the updates to the City's CEQA Manual and TIA Guidelines, and the VMT analysis methodology being proposed?

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What is the deadline to submit comments, suggestions and/or feedback regarding the VMT analysis methodology?

All comments, suggestions and/or feedback related to VMT analysis methodology must be received in email format by 5:00 p.m. on Wednesday, October 23, 2019.

When is the next stakeholder workshop expected to occur?

Stakeholder workshop #2 is tentatively scheduled for late November/early December 2019. Notices for that meeting will be sent once a date is confirmed.