

Transportation Impacts Under CEQA: Converting Level of Service (LOS) to Vehicle-Miles Traveled (VMT)

Frequently Asked Questions

- **What is CEQA?**

The California Environmental Quality Act (CEQA) is a State statute that requires State and local agencies to identify significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible¹.

- **What are the CEQA transportation requirements for the City of San José?**

In conformance with CEQA, the City of San José is required to establish a CEQA standard for measuring traffic impacts of proposed developments. Currently, the standard San José uses measures the Level of Service (LOS) at signalized intersections. The City of San José adopted this measure in Council Policy 5-3, Transportation Impact Policy, to meet CEQA requirements.

- **What is Level of Service (LOS)?**

Transportation Level of Service (LOS) is a measure of traffic conditions at signalized intersections. Level of Service is a qualitative description of operating conditions ranging from LOS A, or free-flow conditions with little or no delay, to LOS F, or jammed conditions with excessive delays. LOS measures levels of congestion and delay at signalized intersections or roadway segments.

- **How does the current LOS relate to proposed development in the City of San José?**

The City of San José's Adopted Transportation Impact Policy, Council Policy 5-3, established LOS "D" as the acceptable level of service standard for intersections within San José. Council policy also established CEQA thresholds which identify when the addition of new project traffic causes a significant environmental impact at signalized

¹ <http://resources.ca.gov/ceqa/more/faq.html>

intersections in the project area. This policy requires proposed developments to address impacts either by mitigation or other acceptable offsetting improvements.

- **How is a proposed development's LOS measured?**

Traffic projections for new developments are typically based on published trip generation rates for established land uses, existing roadway conditions, prevailing traffic flow, and complementary land uses. Traffic engineers measure current levels of congestion, other planned but not yet built sources of traffic, and the amount of traffic new developments add to signalized intersections to determine whether the intersection meets the City's LOS requirements per Council Policy 5-3.

- **What is Vehicle Miles Traveled (VMT)?**

Vehicle Miles Traveled (VMT) measures the number of miles traveled by vehicles. VMT is a function of how many motorized vehicle trips are taken, the distance of those trips, and how many people are in a vehicle. Typically, development located farther from retail, office and other uses and with poor access to transit, generates more driving than development situated close to complementary uses and transit. Commonly, VMT is measured per capita (average vehicle miles traveled per person). Cities use VMT to evaluate greenhouse gas emissions and some transportation impacts.

- **Why is the City undergoing this change?**

The State in 2013 passed SB 743 (Steinberg), which required the establishment of a new method, aside from LOS, to determine the significance of transportation impacts of a project under CEQA. The Governor's Office of Planning and Research (OPR) has recommended that VMT replace LOS as the primary measure of transportation impacts. The OPR guidance generally recommends that the threshold for residential and office projects be 15% below the existing per capita VMT. OPR expects to submit a revised proposal for changes to the CEQA Guidelines to the Natural Resources Agency in June or July of 2017 to commence the formal rulemaking process, after which time jurisdictions will likely have up to two years to complete changes to their policies and practices to comply with State law.

- **Why did the State pass legislation to adopt this change?**

SB 743 (Steinberg) stated that "New methodologies under the California Environmental Quality Act are needed for evaluating transportation impacts that are better able to promote the State's goals of reducing greenhouse gas emissions and traffic-related air

pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations.²”

- **What does this mean for the City of San José?**

This new metric aligns with the Envision San José 2040 General Plan (General Plan) goals for smart and focused growth, accessibility, affordability, great places and public life, economic development, and environmental sustainability. This shift to VMT furthers implementation of the General Plan in the following ways:

Reducing the need to drive to destinations. To mitigate LOS impacts, projects are typically required to add additional lanes to signalized intersections. The General Plan defines how large roadways may be and how large intersections should be. Currently, the City’s arterial roadway network is nearly built out; there is little space to expand or construct new roadways. Furthermore, widening roadways and intersections can make biking and walking more difficult. Under a VMT framework, developments in urban areas with easy access to retail, office, transit, and other uses, are encouraged. These areas have more opportunities for people to choose to bike, walk and take transit instead of drive. In contrast, developments in areas where it is hard to get around without a car will likely have to mitigate the impacts of VMT.

Removing key barriers to more sustainable growth. The General Plan encourages development in growth areas along major transit corridors with supportive transit options where infrastructure to support dense development already exists. However, LOS can be a barrier to further developing these areas.

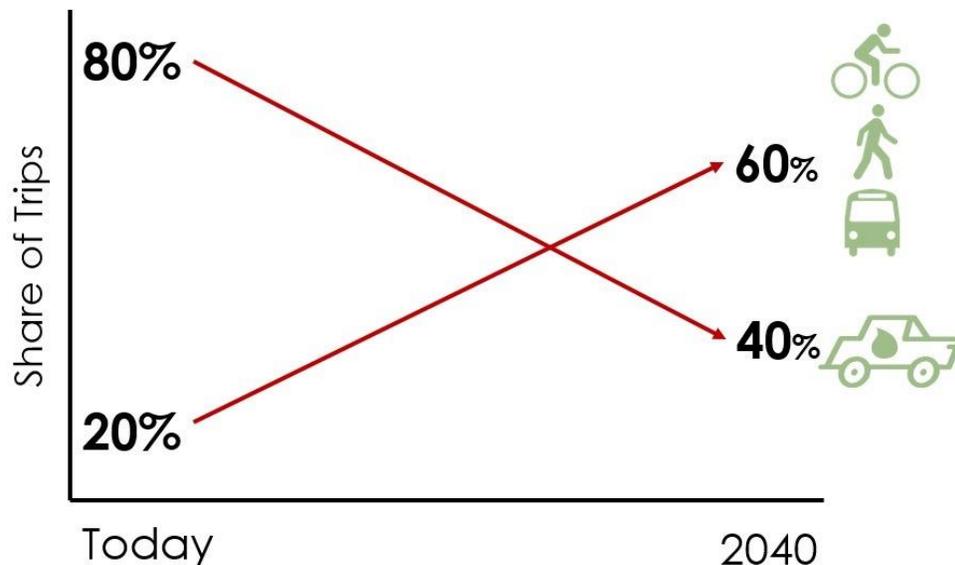
By using LOS to measure transportation impacts, urban areas with more congestion have difficulty maintaining established LOS standards. It is harder in these urban areas to require additional vehicle capacity because the arterial roadway network is nearly built out. This also makes it harder to approve developments in these areas. Suburban areas with less congestion maintain established LOS standards more easily.

In contrast, VMT is a better measure of a project’s environmental effects because increases in VMT result in increased air pollution, greenhouse gases, and energy use.

Streamlining transit and active transportation projects. Transportation projects that promote sustainable transportation options such as new bike lanes, transit, and safer, walkable areas benefit the environment. The General Plan goals for transportation include establishing a balanced transportation system that considers the mobility needs of bicyclists, pedestrians, and public transit users while providing for the safe and efficient movement of automobiles, buses, and trucks. This new metric and associated goals and policies could streamline environmental review of transportation components of VMT-reducing transportation projects.

² http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743

San José Envision 2040 General Plan Mode Share Goals



Taking advantage of an existing metric, VMT, that addresses several General Plan goals. In 2011, the General Plan established VMT goals for building out the City and identified the steps needed to achieve these goals. Moreover, VMT is already used in other portions of CEQA project analysis.

Reducing infrastructure capital and maintenance costs. The costs of maintaining the existing roadway system in San José and statewide has resulted in tremendous maintenance shortfalls. By switching to the VMT metric, the City can establish appropriate transportation policies to encourage multimodal travel and be more fiscally responsible. Switching to a metric that encourages people to drive less, instead of building more infrastructure to meet new demand, can make better fiscal sense.

Improving health and wellness. The General Plan includes policies to encourage physical activity by supporting “complete” communities where people’s daily needs can generally be met walking or biking on safe and convenient paths and routes or by transit. People who build activity into their daily lives such as by walking or bicycling may be more likely to achieve recommended physical activity levels.

- **What is the timeline for these changes?**

Please refer to www.sanjoseca.gov/vmt for an updated timeline.

Residents' Frequently Asked Questions

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

No. The process for weighing in on land use changes and transportation projects will remain the same. Citizens will still be able to provide comments, speak at public hearings, and contact elected representatives on new development. The City Council still has the authority to make land use and transportation decisions.

- **How will the CEQA process in San José change?**

For certain types of transportation projects (e.g. bike lanes and sidewalk gap closures) and certain types of development projects in General Plan growth areas (e.g., some Urban Villages), a transportation analysis under CEQA may not be required. This change to VMT only affects the transportation section under CEQA. Analysis of other CEQA subject areas such as -- biological and, cultural resources, noise, and air quality -- remain the same.

- **How will this change impact the City's ability to ask developers for transportation investments?**

Neighborhood traffic and mobility is very important to the City. Developers will still be required to improve operations to the transportation network and to address neighborhood traffic.

- **Will the shift to VMT make it easier or harder to develop in my neighborhood?**

Every development project is unique and will be evaluated according to its specific attributes and context. However, in general, development proposed in General Plan designated growth areas with good access to transit and a mix of uses (e.g. residential, office and retail) could achieve a streamlined CEQA process if General Plan amendments are not required for the project. Developments in places where it is hard to get around without a car will likely have to mitigate the impacts of VMT.

Developers' Frequently Asked Questions

- **Will the shift to VMT change the CEQA process?**

The CEQA process will not change, but some projects currently not exempt from CEQA transportation analysis may be exempt from CEQA transportation analysis under VMT.

- **How will this change impact new development projects?**

New development projects that are required to analyze VMT will still be required to have a traffic impact analysis. Generally, new development proposals will be required to have project impacts measured using new City transportation policies based on the VMT metric. Mixed-use development in General Plan growth areas, located near transit, may be more likely to meet VMT reduction thresholds more easily. Proposed developments not in growth areas and transit corridors will likely need to provide mitigation to reduce VMT impacts. Outside of the CEQA process, projects will continue to be required to analyze local LOS impacts to assess operational impacts of new development.

- **How will this change impact new transportation projects?**

Transportation projects that by their attributes help reduce VMT such as bicycle lanes, transit facilities, and sidewalk improvements, may no longer have to go through a CEQA analysis for transportation environmental impacts. These projects may still be subject to city analysis on overall transportation system and operations impacts.

Community Stakeholders' Frequently Asked Questions

- **How will this change impact housing?**

Each development is unique and will be considered on an individual basis. Proposed very high-density housing developments that are consistent with the General Plan and support transit use – and that are located in areas with high-quality transit and amenities – may not have to analyze transportation impacts under CEQA, which may streamline the CEQA process.

- **How will this change impact affordable housing?**

According to the Association of Bay Area Governments' report on *Transit Oriented Development and Affordable Housing*³, lower-income households have lower car ownership rates than moderate-income households. Although each development is unique and will be individually analyzed, very high-density affordable housing developments tend to generate lower VMT than market-rate housing at comparable densities.

³ <http://reports.abag.ca.gov/other/Transit-and-Affordable-Housing-Survey.pdf>

- **Will this change impact the environment?**

In the past, greenfield development generated fewer transportation LOS impacts under CEQA because the LOS impacts in these outlying locations were minimal; in contrast, LOS impacts in infill locations are high. VMT is a more holistic approach to analyzing the transportation impacts of new development and generally aligns the type of development encouraged in the General Plan (infill near transit and services) with CEQA.

- **What are the impacts on business?**

In general, businesses that are developing land uses at certain intensities that conform to the General Plan and that are in growth areas with high-quality transit may not have to analyze transportation impacts under CEQA, which may streamline the environmental review process.