

Background

Senate Bill 743 (SB 743) was signed into law on September 27, 2013 and mandates a change in the way transportation impacts are assessed through the California Environmental Quality Act (CEQA) starting July 1, 2020. SB 743 requires that automobile delay not be used and directs the selection of a new measurement that better addresses the State's goals on climate change and multi-modal transportation.

Traditional transportation analysis, under CEQA and the County's guidelines cited above, has used automobile delay – commonly measured by “Level of Service” (LOS) – when analyzing transportation impacts. Automobile delay/LOS uses how long drivers sit in traffic or at traffic signals to assess impacts.

The County of San Diego previously adopted “*Guidelines for Determining Significance and Report Format and Content Requirements for Transportation and Traffic*” in 2006, with revisions and modifications approved in 2007, 2009, 2010 and 2011 that focused primarily on metrics related to vehicle delay through LOS for determining whether a land development project may have a significant traffic effect on the environment pursuant to CEQA. This document will no longer be applicable due to adoption of SB 743. As a result, a new technical guidance document is needed to describe the process and procedure for project applicants and their consultants to use when preparing transportation analysis in the unincorporated area has been prepared.

The Governor's Office of Planning and Research developed guidance documents and technical advisories (2013 – 2018) to establish new methods for determining the significance of transportation impacts. OPR recommended that Vehicle Miles Traveled (VMT) be the primary metric for evaluating transportation impacts under CEQA. VMT measures the number of vehicle trips generated and the length or distance of those trips.

While the changes required as a part of SB 743 are a complete break with past practice, the law leaves many aspects of transportation planning to the discretion of local jurisdictions and lead agencies. Several such items unaffected by the law include:

- General Plan policies related to transportation and circulation. Specifically, local jurisdictions can continue to use LOS as a method of managing local roadway network performance and development project review.
- Existing fee programs adopted by local jurisdictions. Specifically, local jurisdictions can continue to require development to pay into an adopted traffic improvement fee, provided that the fee is: a) linked to needed, planned transportation improvements listed in General Plan; and b) supported by a “nexus” study; and
- Local jurisdictions may continue considering capacity and congestion outside of CEQA.

Planning & Development Services, in conjunction with the Department of Public Works, Department of Parks and Recreation, County Counsel, and technical experts, prepared options available to the County of San Diego (County) as it transitions from LOS to VMT. This working group proposed options as part of a two-phase approach:

- Phase 1: Preparation of this Transportation Study Guide to describe the potential processes and procedures for project applicants and their consultants to use when preparing transportation analyses in the unincorporated county. The Transportation Study Guide includes VMT analysis methodologies to be compliant with SB 743/CEQA as well

as Local Mobility Analyses to address development-related circulation and access deficiencies; operational and road safety considerations; and infrastructure needs to maintain the LOS D standard in the County General Plan. Phase 1 options and analyses will be presented to the Board of Supervisors (Board) for consideration in June 2020.

- Phase 2: Evaluation of mitigation measure options necessary to address impacts from VMT analysis. Options may include regional mitigation banks, mitigation exchanges, and/or impact fees. This phase will also include an analysis of the impact of SB 743 on the County's Transportation Impact Fee program and the County General Plan's LOS requirements. A date has not yet been set when Phase 2 will be presented to the Board.

The sections below provide an overview of the VMT and Local Mobility Analysis components contained within the proposed Transportation Study Guide.

Vehicle Miles Traveled Transportation Analysis for CEQA

All proposals defined as "Projects" under CEQA will be required to analyze transportation as a part of CEQA environmental review. Components of a VMT analysis include, but are not limited to:

- Screening criteria to identify which Projects are required to submit detailed VMT analysis
- VMT thresholds for use in identifying transportation impacts
- Mitigation requirements for Projects with significant transportation impacts

The draft TSG includes options to set a geographic boundary to calculate VMT (or quantifying the average baseline VMT for an area for comparison with the estimated VMT of a proposed project). These options will be considered by the Planning Commission and Board of Supervisors before July 1, 2020. The options include a geography based on the San Diego region, unincorporated area, and smaller subareas within the unincorporated county.

VMT Mitigation

To mitigate VMT impacts, the project applicant must reduce VMT, which can be done by either reducing the number of automobile trips generated by the project or by reducing the distance of those trips. The following strategies are available to achieve this:

- Modify the project's site design or land use characteristics to reduce VMT generated by the project. This can include increasing/decreasing density, introducing a mix of uses, clustering development, or making site design improvements such as sidewalks, bikeways, transit stop enhancements, priority carpool parking, etc.
- Implement Transportation Demand Management measures to reduce VMT generated by the project. This can include on-going programs such as transit coordinators, transit pass subsidies, shuttle programs, etc.
- Where available, project applicants may also be able to mitigate using programmatic mitigation mechanisms such as VMT mitigation banks, exchanges, fee programs, etc.

Local Mobility Analysis Transportation Analysis outside of CEQA

The authority for requiring non-CEQA transportation analysis and project improvement conditions to address identified deficiencies lies in the County’s Site Plan review authority and General Plan policies to promote orderly development, promote public safety, and to ensure land development site planning and the needed infrastructure are adequate.

A Local Mobility Analysis analyzes the effects of a Project on transportation, access, circulation, and related safety elements proximate to the Project and establishes consistency with the General Plan or other County requirements. Any adverse effects are addressed through the improvements of a land development project and supplement any required VMT CEQA analysis.

Components of Local Mobility Analysis include, but are not limited to:

- Screening to determining whether or not the project has to complete a Local Mobility Analysis, and if so, what the study requirements will be based on General Plan consistency and estimated daily trips.
- Requirements for items such as intersection delay, peak hour factor, saturation flow rate, signal timing, pedestrian calls, heavy truck percentage, lane utilization factors, and queue and storage analysis.
- Analysis of the project’s effect on safety/roadway operations; access management and site design; and active transportation deficiencies and appropriate improvements.

Local Mobility Analysis Improvements

Based on the Local Mobility Analysis, the following examples of operational, multi-modal and safety-based treatments may be considered as conditions of approval for development projects:

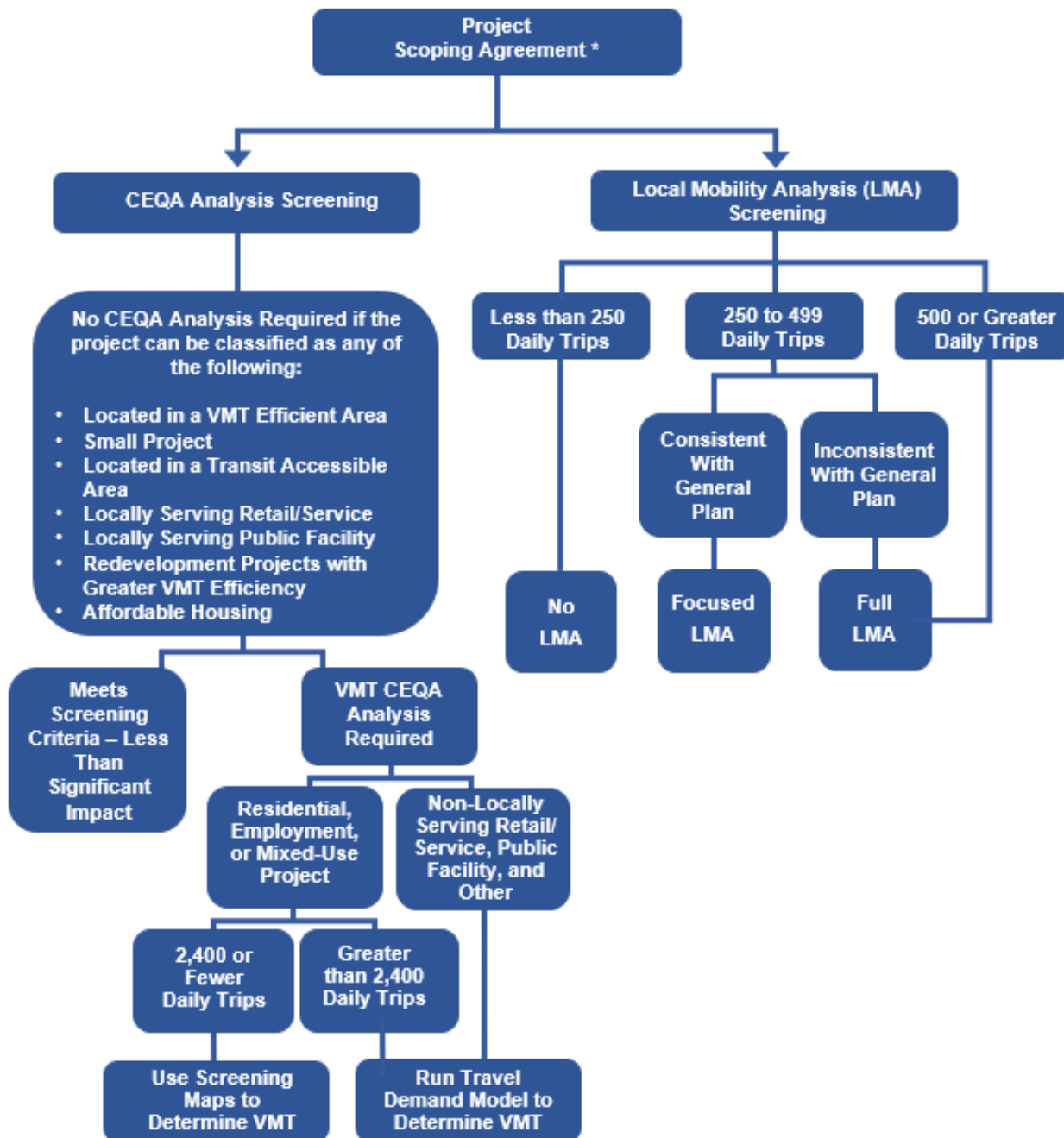
Facility Type	Treatment
Freeways	Ensure intersection and freeway ramps capacity and storage don’t spill onto local roadways
Roadways	Roadway shoulder enhancements to provide “breakdown space,” dedicated space for use only by transit vehicles, to provide bicycle access, or otherwise to improve safety
Intersections	Addition of through lane(s), right turn lane(s) and left turn lane(s)
	Left and/or right turn lane pocket length (queue length)
	Intersection control measures/coordination (stop control, signal, roundabout)
	Intersection geometrics for heavy vehicle traffic (e.g. curb returns)
Driveways	Sight distance
	Driveway length and gated entrances

Facility Type	Treatment
Driveways, con't.	Corner clearance
	Number of driveways
Access Management	Raised median and two-way-left-turn lanes
	Sight distance improvements
	Access and signal spacing
	Gap analysis
Complete Streets - Bicycle, Pedestrian & Transit	Infrastructure
	Accessibility
	Bus turnouts
Parking	Parking plans and restrictions
Traffic Calming	Vertical deflections (speed humps, speed tables, and raised intersections), horizontal shifts, roadway narrowing, etc.

The proposed Transportation Study Guide takes into account the potential for both VMT and Local Mobility Analysis for project applications. As such, the Local Mobility Analysis adjusts the use of LOS and introduces other metrics related to active transportation and other multi-modal options, complementary to the intent of SB 743. As compared to the County’s previous Traffic Impact Guide where LOS was the sole metric, the proposed Transportation Study Guide focuses on flexibility and early scoping agreements as a way to limit the extent of study, cost, and balance both VMT and local mobility.

The following flow chart identifies the proposed Transportation Study Guide process and framework:

Scoping Framework for Transportatino Studies



*A project may require: LMA analysis only, CEQA analysis only, LMA and CEQA analysis, or no LMA or CEQA analysis

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