



**AEP Webinar:
Overview of the
Proposed CEQA Guidelines
Amendments**
December 13, 2017



Today's Speakers

- » Devon Muto, AEP President, ICF, devon.muto@icf.com
- » Jeannie Lee, OPR, jeannie.lee@opr.ca.gov
- » Terry Rivasplata, ICF, antero.rivasplata@icf.com
- » Chris Ganson, OPR, chris.ganson@opr.ca.gov



Today's Agenda

- » **Introductions & Overview**
- » **Guidelines Amendment Process**
- » **Text Amendments**
- » **Checklist Amendments**
- » **Transportation Amendments**
- » **VMT from the Practitioners' Perspective**
- » **Q & A**

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Acknowledgements

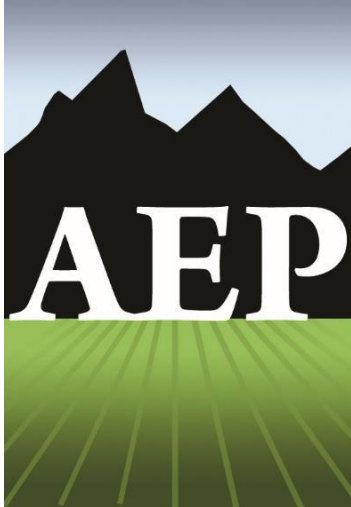
- » **OPR**
- » **AEP, AEP Board and Chapters, Legislative Committee**
- » **Advanced CEQA Workshop**
 - Santa Barbara County (*Mindy Fogg*)
 - Ascent Environmental (*Gary Jacobs*)
- » **PPT Template**
 - PlaceWorks (*Grant Reddy*)

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California Association of Environmental Professionals



- » **Founded in 1974**
- » **Non-profit association of public and private sector professionals**
- » **Serve the principles underlying California Environmental Quality Act (CEQA) including environmental assessment, analysis, public disclosure, and reporting**
- » **Individual membership is only \$150**
- » **For more information about AEP and on how to become a member, visit us at www.califaep.org**

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Part I. Guidelines Amendments Process



Background

- » Summer 2013: OPR Solicitation for input
- » December 2013: Possible list of topics and evaluation of alternative transportation metrics
- » August 2014: Draft guidelines for VMT
- » August 2015: Draft guidelines amendments
- » January 2016: Updated draft guidelines for VMT and technical advisory
- » November 2017: OPR Submits Package to Resources Agency

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Package Submitted to Natural Resources Agency

- » **Transmittal Letter**
- » **Proposed Updates to the CEQA Guidelines – comprehensive proposal**
- » **“Thematic Responses to Comments” document**
- » **“Frequently Asked Questions” document**
- » **Technical Advisory on evaluating transportation impacts**
- » **Public comments**
- » **Technical research**
- » **List of public and stakeholder meetings/briefings**

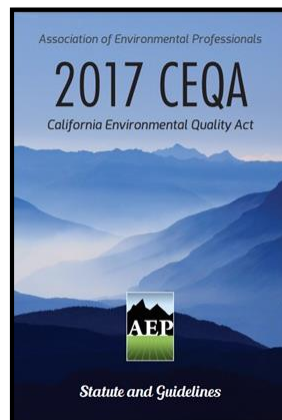
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What's Next

- » Natural Resource Agency review (NOPA, ISOR, regulatory text)
- » Minimum 45-day public comment period; public hearing
- » Responses to public comments
- » Prepare final rulemaking file (FSOR)
- » Submittal to Office of Administrative Law (OAL)
- » OAL review – 30 working days to review
- » OAL completes rulemaking
- » (Should be in AEP's CEQA book in 2019!)



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What's in the Package

- » Process Improvements
 - E.G.: regulatory standards and thresholds; program EIRs and tiering; Appendix G rewrite
- » Substantive Improvements
 - E.G.: energy impacts, water supply, transportation, greenhouse gases
- » Technical Improvements
 - E.G.: baseline, deferral of mitigation details; responses to comments; hazards

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Part II. Text Amendments



Process (Efficiency) Improvements

- » Using Regulatory Standards in CEQA (15064 & 15064.7)
- » “Within the Scope” of a Program EIR (15168)
- » Clarifying Rules on Tiering (15162)
- » Transit Oriented Development Exemption (15182)
- » Using the Existing Facilities Exemption (15301)
- » Updating the Environmental Checklist (Appendix G)
- » Remedies and Remand (15234)



Using Regulatory Standards in CEQA

Section 15064. Determining the Significance of the Environmental Effects Caused by a Project

- » **Provides that when using a threshold of significance, the lead agency should briefly explain how compliance with the threshold would reduce impacts below a level of significance**
 - The explanation must be based on substantial evidence
 - The threshold is still subject to the fair argument standard



Using Regulatory Standards in CEQA

Section 15064.7. Thresholds of Significance

- » **Clarifies that agencies may use thresholds on a case-by-case basis**
- » **Encourages “using environmental standards as thresholds”**
 - When adopting an environmental standard, the agency must explain how the standard avoids project impacts and why it’s relevant to the project
- » **Defines “environmental standard” as meeting all of the following:**
 - a quantitative, qualitative or performance requirement found in an ordinance, resolution, rule, regulation, order, plan or other environmental requirement of general application;
 - adopted for the purpose of environmental protection;
 - addresses the environmental effect caused by the project; and,
 - applies to the project under review



“Within the Scope” of a Program EIR

Section 15168. Program EIR

- » **Provides that where a later activity would have impacts not examined in the PEIR, its analysis “may tier from the Program EIR as provided in Section 15152”**
- » **Clarifies that whether a later activity is within the scope of a PEIR is a factual question determined by the lead agency based on substantial evidence in the record. Factors that an agency may consider include, but are not limited to:**
 - Consistency of the later activity with the type of allowable land use,
 - Overall planned density and building intensity,
 - Geographic area analyzed for environmental impacts, and
 - Description of covered infrastructure, as presented in the project description or elsewhere in the PEIR



Clarifying Rules on Tiering

Section 15152. Tiering

- » **Clarifies that this section is only one of several methods to streamline the environmental review process**
- » **Clarifies that “where other methods have more specific provisions, those provisions shall apply, rather than the provisions of this section”**
- » **Authorizes a lead agency to use its discretion to decide which method to use if multiply methods might apply**



Transit Oriented Development Exemption Section 15182. Projects Pursuant to a Specific Plan

- » **Expanded to include residential, commercial, and mixed-use projects that are proximate to transit**
 - Consistent with a Sustainable Communities Strategy
 - Floor area ratio of 0.75 or more for commercial component
 - Located within ½ mile of existing or planned high quality transit
 - Consistent with the specific plan
- » **The current provision for residential projects consistent with a specific plan for which an EIR has been certified is retained with minor revisions**

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Using the Existing Facilities Exemption Section 15301. Existing Facilities

- » **Clarifies that the Class 1 exemption can apply to projects involving negligible or no expansion of an existing or former use**
- » **Clarifies that this exemption's application streets and trails to may include:**
 - "other alterations such as the addition of bicycle facilities, including but not limited to bicycle parking, bicycle-share facilities and bicycle lanes, pedestrian crossings, street trees, and other similar improvements that do not create additional automobile lanes"

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Remedies and Remand

New Section 15234. Remand

- » **Summarizes the remedies that a court may impose in CEQA litigation:**
 - void the project approval, in whole or in part;
 - suspend any project activities that preclude consideration and implementation of mitigation measures and alternatives necessary to comply with CEQA; or
 - take specific action necessary to bring the agency's consideration of the project into compliance with CEQA
- » **Describes when the court may allow actions that are severable to proceed**

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Substance Improvements

- » Energy Impact Analysis (15126.2)
- » Water Supply Analysis (15155)
- » Transportation Analysis (15064.3)
- » Greenhouse Gas Analysis (15064.4)

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Energy Impact Analysis

Section 15126.2. Consideration and Discussion of Significant Environmental Impacts

- » **Adds requirement that EIR analyze and mitigate environmental effects “due to wasteful, inefficient, or unnecessary consumption of energy”**
 - This includes all phases of the project, including transportation, during construction and operation
 - The analysis is to focus on energy demand caused by the project
 - The section cross-references Guidelines Appendix F



Water Supply Analysis

Section 15155. Water Supply Analysis

- » **Provides that the “degree of certainty regarding the availability of water supplies will vary depending on the stage of project approval”**
 - Specific projects should have greater certainty than “a conceptual plan”
- » **Specifies that the analysis in the CEQA document is to include:**
 - “Sufficient information regarding the project’s proposed water demand and proposed water supplies to permit the lead agency to evaluate the pros and cons of supplying the amount of water that the project will need”
 - “An analysis of the reasonably foreseeable environmental impacts of supplying water throughout the life of all phases of the project”
 - “An analysis of circumstances affecting the likelihood of the water’s availability, as well as the degree of uncertainty involved. Relevant factors may include but are not limited to, drought, salt-water intrusion, regulatory or contractual curtailments, and other reasonably foreseeable demands on the water supply.”



Transportation Analysis

New Section 15064.3. Determining the Significance of Transportation Impacts

- » **“Generally, vehicle miles travelled is the most appropriate measure of transportation impacts.”**
 - Other relevant considerations may include effects on transit and non-motorized travel
 - With one exception, “a project’s effect on automobile delay does not constitute a significant environmental impact”
 - The exception: agencies “have discretion to determine the appropriate measure of transportation impact” for roadway capacity projects



New Section 15064.3. Determining the Significance of Transportation Impacts (cont'd)

- » **Criteria for analyzing Transportation Impacts**
 - Land use projects: VMT exceeding a threshold may indicate a significant impact
 - Projects within ½ mile of existing major transit stop or high quality transit corridor presumed to be LTS
 - Projects that decrease VMT in the project area compared to existing conditions considered to be LTS
 - Roadway capacity projects:
 - Projects that reduce or have no impact on VMT presumed to be LTS
 - However, agency has discretion whether or not to use VMT as its traffic metric
 - Qualitative Analysis:
 - May be used “if existing models or methods are not available to estimate the VMT for the particular project”
 - Evaluate factors such as transit availability, and proximity to other destinations
 - Qualitative analysis of construction traffic “may be appropriate” for many projects
 - Methodology: at the lead agency’s discretion to choose what’s appropriate
 - Assumptions must be explained and documented in the environmental document
- » **Takes effect statewide January 1, 2020**



Greenhouse Gas Analysis

Section 15064.4. Thresholds of Significance (Greenhouse Gas Emissions)

- » **Clarifies that when determining significance of GHG emissions, the focus is on the project’s “reasonably foreseeable incremental contribution”**
 - The significant factors may include consistency with the “State’s long-term climate goals and strategies” when supported by substantial evidence of how those address the project



Technical Improvements

- » Hazards (15126.2(a))
- » Baseline (15125)
- » Mitigation details (15126.4)
- » Responses to Comments (15087 & 15088)
- » Notice of Determination and Notice of Exemption (15062, 15075, & 15094)
- » Pre-Approval Agreements (15004)
- » Lead Agency by Agreement (15051)
- » Common Sense Exemption (15061)
- » Preparing the Initial Study (15063)
- » Consultation with Transit Agencies (15072 & 15086)



Technical Improvements (cont.)

- » Citations in Environmental Documents (15072 & 15087)
- » Posting with the County Clerk (15082)
- » Time Limits for Negative Declarations (15107)
- » Project Benefits (15124)
- » Joint NEPA/CEQA Documents (15122)
- » Using the Emergency Exemption (15269)
- » When is a Project Discretionary? (15357)
- » Conservation Easements as Mitigation (15370)
- » Appendices to the CEQA Guidelines (Appendices C and M)



Hazards

Section 15126.2. Consideration and Discussion of Significant Environmental Impacts

- » **Clarifies that CEQA applies to impacts of the environment on the project**



Baseline

Section 15125. Environmental Setting

- » **Clarifies that where conditions change or fluctuate over time, a lead agency may define existing conditions (when supported by substantial evidence):**
 - By reference to historic conditions
 - As “conditions expected when the project becomes operational”
 - Consisting of “projected future conditions that are supported by reliable projections”
- » **Specifies that historic conditions or project future conditions baseline can only be used as the “sole baseline for analysis” when substantial evidence demonstrates:**
 - Use of existing conditions would be either misleading or without informative value to decision-makers and the public”
 - The projected future conditions are “supported by reliable projections”
- » **Prohibits the use of hypothetical conditions as the baseline**

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Mitigation Details

Section 15126.4. Consideration and Discussion of Mitigation Measures to Minimize Significant Effects

- » **Describes the situations under which the specific details of a mitigation measure may be deferred when it is “impractical or infeasible to include those details during the environmental review.” The agency must:**
 - Commit to the mitigation
 - Adopt specific performance standards the mitigation will achieve and
 - List the potential actions to be “considered, analyzed, and potentially incorporated in the mitigation measure”
- » **Provides that compliance with a regulatory permit may be identified as a future action if:**
 - Compliance is mandatory and
 - The measures would “be reasonably expected” to reduce the impact “to the specified performance standards”
 - This would need to be supported by substantial evidence

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Responses to Comments

Section 15087. Public Review of Draft EIR

- » Specifies that the notice of DEIR availability state “the manner in which the lead agency will receive ... comments.”



Response to Comments

Section 15088. Evaluation and Response to Comments

- » Clarifies that the lead agency must respond to comments “raising significant environmental issues”
- » Authorizes the lead agency to send electronic copies of its responses to commenting public agencies
- » Clarifies that the level of detail in the response may correspond to the level of detail provided in the comment (i.e., a general comment can receive a general response)



Notice of Determination and Notice of Exemption Section 15062. Notice of Exemption

- » Provides that the NOE shall identify the person undertaking the activity being exempted



Notice of Determination and Notice of Exemption Section 15075. NOD on a Project for Which a Proposed ND or MND Has Been Approved

- » Adds that the NOD shall identify the person undertaking the activity being approved



Notice of Determination and Notice of Exemption Section 15094. Notice of Determination

- » **Adds that the NOD shall identify the person undertaking the activity being approved**



Pre-Approval Agreements Section 15004. Time of Preparation

- » **Clarifies that an agency contemplating a property acquisition may identify a preferred site and enter into an acquisition agreement when future use is conditioned on CEQA compliance**
- » **Provides that in entering into a preliminary agreement, the agency shall not commit the agency to the project and the agreement shall:**
 - Condition the agreement on CEQA compliance
 - Specify that it is not binding on any party
 - Specify that it doesn't restrict the agency from considering any feasible alternatives and mitigation measures



Lead Agency by Agreement

Section 15051. Criteria for Identifying the Lead Agency

- » Provides that where more than one agency meets the criteria to be lead agency, the agency that acts first “will normally” be the lead agency



Common Sense Exemption

Section 15061. Review for Exemption

- » Renames the “general rule” exemption the “common sense exemption” in keeping with the nomenclature used by the California Supreme Court



Preparing the Initial Study

Section 15063. Initial Study

- » **Provides that the lead agency may:**
 - prepare the IS itself,
 - contract with another entity to prepare it,
 - accept a draft IS prepared by the applicant, or
 - execute a third party agreement with the applicant for preparation of the IS



Consultation with Transit Agencies

Section 15072. Notice of Intent to Adopt an ND or MND

- » **Adds that the lead agency should consult with public transit agencies with facilities within ½ mile of project of statewide, regional, or areawide significance which have transportation facilities that could be affected by the project**



Consultation with Transit Agencies

Section 15086. Consultation Concerning Draft EIR

- » **Adds that the lead agency should consult with public transit agencies with facilities within ½ mile of project of statewide, regional, or areawide significance which have transportation facilities that could be affected by the project**



Citations in Environmental Documents

Section 15072. Notice of Intent to Adopt an ND or MND

- » **Clarifies that public notice must identify the location where “all documents incorporated by reference” are available for review**
 - This would change the current language of “all documents referenced”



Citations in Environmental Documents

Section 15087. Public Review Notice for Draft EIR

- » **Clarifies that the notice must identify the location where “all documents incorporated by reference” are available for review**
 - This would change the current language of “all documents referenced”



Posting with the County Clerk

Section 15082. NOP and Determination of Scope of EIR

- » **Clarifies that the NOP is to be filed with OPR and “the county clerk of each county in which the project will be located”**



Time Limits for Negative Declarations

Section 15107. Completion of Negative Declaration for Certain Private Projects

- » **Provides that the 180-day time limit for completing an ND or MND can be extended “once for a period of not more than 90 days” with mutual consent of agency and applicant**



Project Benefits

Section 15124. Project Description

- » **Clarifies that the statement of objectives “may discuss project benefits”**



Joint NEPA/CEQA Documents

Section 15222. Preparation of Joint Documents

- » **Provides that a lead agency “may also enter into a Memorandum of Understanding with the federal agency to ensure that both federal and state requirements are met”**



Using the Emergency Exemption

Section 15269. Emergency Projects

- » **Provides that long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term may qualify for exemption:**
 - “If the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare,” or
 - If “activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.”



When is a Project Discretionary? Section 15357. Discretionary Project

- » **Summarizes the remedies that a court may impose in CEQA litigation:**
 - void the project approval, in whole or in part;
 - suspend any project activities that preclude consideration and implementation of mitigation measures and alternatives necessary to comply with CEQA; or
 - take specific action necessary to bring the agency's consideration of the project into compliance with CEQA
- » **Describes when the court may allow actions that are severable to proceed**

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Conservation Easements as Mitigation Section 15370. Mitigation

- » **Expands the statement on compensation as mitigation to include:**
 - “permanent protection of ... resources in the form of conservation easements”

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Appendices to the CEQA Guidelines

Appendix C and Appendix M

- » **Appendix C – Notice of Completion**
 - Minor revisions to add checkboxes for greenhouse gas and tribal cultural resources, and to change traffic checkbox to “transportation”
 - Minor revisions to the list of state agencies
- » **Appendix M - Performance Standards for Infill Projects Eligible for Streamlined Review**
 - Corrections to typos in current version

Part III.

Checklist Amendments



Appendix G – Sample Environmental Checklist

- » **Aesthetics**: clarifies that “public views” are key and consistency with scenic regulations in an urbanized area
- » **Air Quality**: consolidates two questions to one, to read “result in a cumulatively considerable net increase in an existing or projected air quality violation;” revises a question to read “Result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?”
- » **Cultural Resources**: moves the paleontology question to Geology & Soils
- » **Energy Resources**: new questions relating to “wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation”

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Appendix G – Sample Environmental Checklist (cont'd)

- » **Geology & Soils**: revises questions to clarify focus on impacts of project on the environment
- » **Hydrology & Water Quality**: clarifies the questions, removes question on flood hazard, and adds references to sustainable groundwater management planning
- » **Land Use & Planning**: clarifies that conflict with protective plan can cause significant impact
- » **Noise**: revises questions to clarify focus on impacts of project on the environment
- » **Population & Housing**: revises question to focus on “substantial unplanned population growth”

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Appendix G – Sample Environmental Checklist (cont'd)

» **Transportation:** renames this issue; revises questions

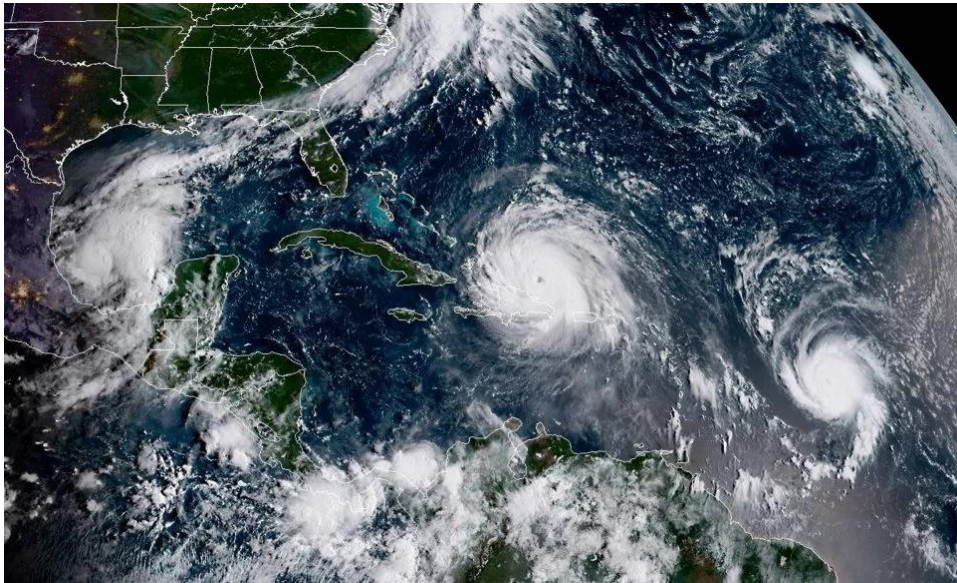
- Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?
- For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)? [VMT]
- For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)? [VMT]

» **Utilities & Service Systems:** clarifies the questions

» **Adds Wildfire:**

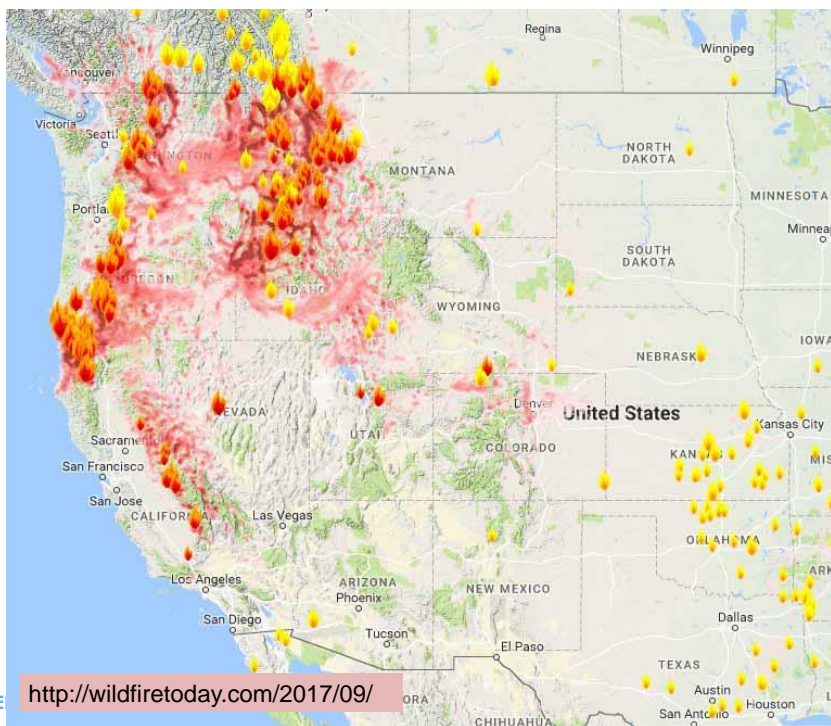
- Impair an emergency response or evacuation plan
- Exacerbate wildfire risks
- Impacts from fire protection infrastructure
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

Part IV. Transportation Amendments



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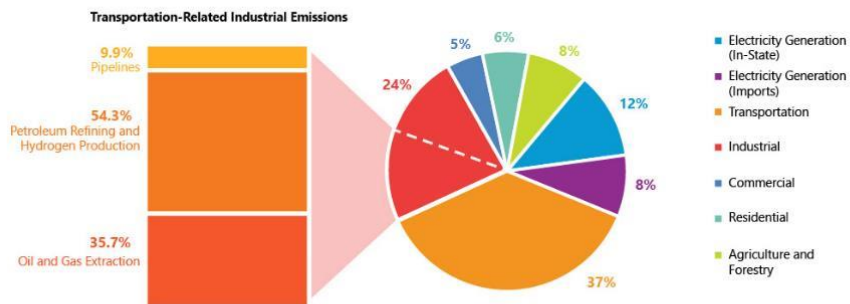
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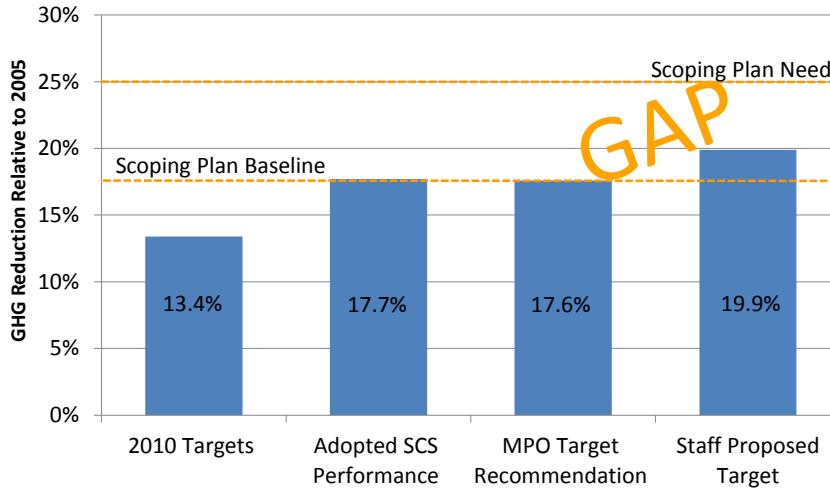
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**CA GREENHOUSE GAS INVENTORY 2014
BY SECTOR AND ACTIVITY (2016 EDITION)**



VMT Reduction from SB 375



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LOS unhelpful to transportation

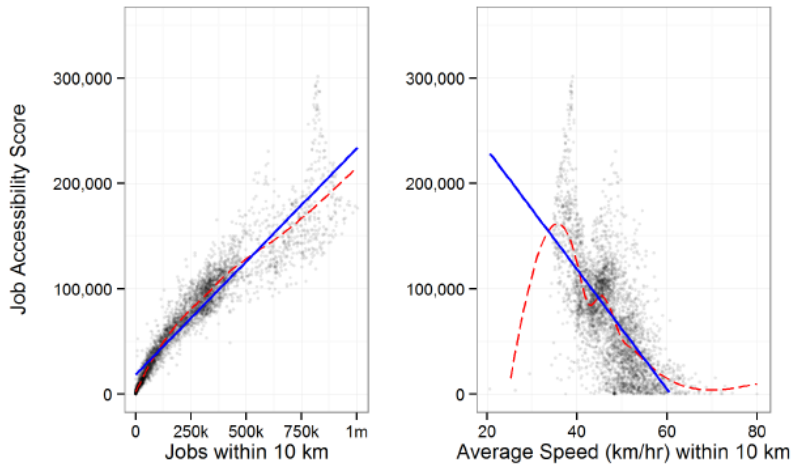


Figure 1 The Relationship Between Proximity To Jobs And Job Accessibility (left) and Local Area Traffic Speeds And Job Accessibility (right)

Mondschein, Osman, Taylor, Thomas – SCAG Area
http://www.its.ucla.edu/wp-content/uploads/sites/6/2015/11/Haynes_Congested-Development_1-Oct-2015_final.pdf

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“...myopic focus on the traffic impacts of new developments is misguided and may actually decrease accessibility and economic activity in an effort to protect traffic flows.”

Mondschein, Osman, Taylor, Thomas

http://www.its.ucla.edu/wp-content/uploads/sites/6/2015/11/Haynes_Congested-Development_1-Oct-2015_final.pdf

Proposed CEQA Guidelines implementing SB 743
transferred to Resources Agency

Old metric:

Transportation impact = **Level of Service (LOS)**

New metric:

Transportation impact = **Vehicle Miles Traveled (VMT)**

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Level of Service A
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Benefits of VMT as a Measures of Transportation Impact

Picturing a low-VMT future



Image Credits- Urban Advantage, Roma Design Group, City of Dana Point

Benefits of VMT as a Measures of Transportation Impact

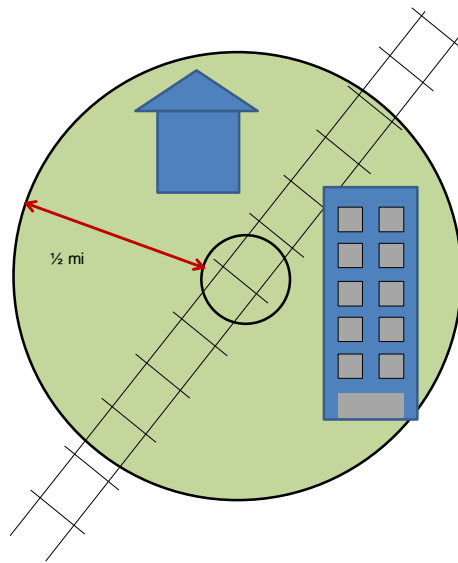
Picturing a low-VMT future



Image Credits- Urban Advantage, Roma Design Group, City of Dana Point

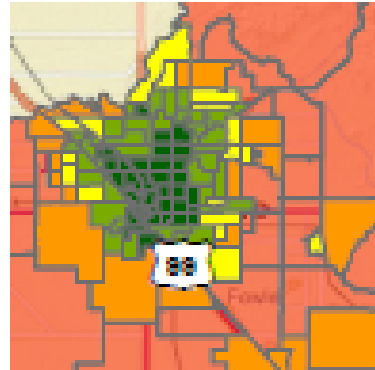
Benefits of VMT as a Measures of Transportation Impact

1. Streamline TOD



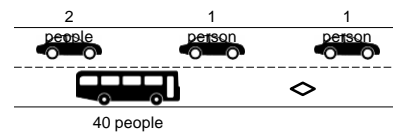
Benefits of VMT as a Measures of Transportation Impact

1. Streamline TOD
2. **Streamline infill**



Benefits of VMT as a Measures of Transportation Impact

1. Streamline TOD
2. Streamline infill
3. **Streamline transit projects**



Benefits of VMT as a Measures of Transportation Impact

1. Streamline TOD
2. Streamline infill
3. Streamline transit projects
4. **Streamline active transportation projects**



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Benefits of VMT as a Measures of Transportation Impact


1. Streamline TOD
2. Streamline infill
3. Streamline transit projects
4. Streamline active transportation projects
5. **Streamline locally-serving retail**



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Benefits of VMT as a Measures of Transportation Impact

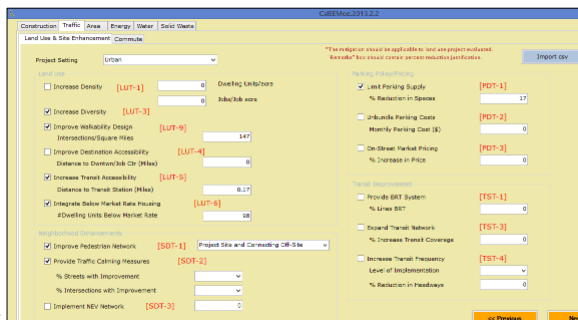
1. Streamline TOD
2. Streamline infill
3. Streamline transit projects
4. Streamline active transportation projects
5. Streamline locally-serving retail
6. **Streamline modeling for remaining projects**



Category	Item	Value	Unit
Land Use	1.00	1000	sq ft
	2.00	2000	sq ft
	3.00	3000	sq ft
	4.00	4000	sq ft
	5.00	5000	sq ft
	6.00	6000	sq ft
	7.00	7000	sq ft
	8.00	8000	sq ft
	9.00	9000	sq ft
	10.00	10000	sq ft
Transportation	1.00	1000	sq ft
	2.00	2000	sq ft
	3.00	3000	sq ft
	4.00	4000	sq ft
	5.00	5000	sq ft
	6.00	6000	sq ft
	7.00	7000	sq ft
	8.00	8000	sq ft
	9.00	9000	sq ft
	10.00	10000	sq ft

<http://www.caleemod.com/>

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The screenshot shows the CalEEMod 2011.2.2 interface with the following settings:

- Project Setting:** Urban
- Land Use:**
 - Increase Density (LUT-1): 0
 - Increase Density (LUT-3): 0
 - Improve Walkability Design (LUT-9): 1.47
 - Improve Destination Accessibility (LUT-4): 0
 - Increase Transit Accessibility (LUT-5): 0.27
 - Improve Below-Market Rate Housing (LUT-6): 0
- Neighborhood Improvements:**
 - Improve Pedestrian Network (SOF-1): Project Site and Corridorwide CR-5/6
 - Provide Traffic Calming Measures (SOF-2): % Streets with Improvement
 - Implement NEV Network (SOF-3): 0
- Parking:**
 - Limit Parking Supply (PDT-1): 17
 - Urbanize Parking Costs (PDT-2): 0
 - On-Street Market Pricing (PDT-3): 0
- Transit:**
 - Provide BRT System (TST-1): 0
 - Expand Transit Network (TST-3): 0
 - Increase Transit Coverage (TST-4): 0

Benefits of VMT as a Measures of Transportation Impact

1. Streamline TOD
2. Streamline infill
3. Streamline transit projects
4. Streamline active transportation projects
5. Streamline locally-serving retail
6. Streamline modeling for remaining projects
7. **Attack regional congestion more effectively**



http://www.opr.ca.gov/docs/ITE_Journal_Article_-_Decisions_Values_and_Data.pdf



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Benefits of VMT as a Measures of Transportation Impact

1. Streamline TOD
2. Streamline infill
3. Streamline transit projects
4. Streamline active transportation projects
5. Streamline locally-serving retail
6. Streamline modeling for remaining projects
7. Attack regional congestion more effectively
8. **Reduce future pavement maintenance obligations**



http://lqc.org/wordpress/docs/events/first_thursday_dinners/ftd_2013_Protecting_Transportation-june.pdf

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Benefits of VMT as a Measures of Transportation Impact

1. Streamline TOD
2. Streamline infill
3. Streamline transit projects
4. Streamline active transportation projects
5. Streamline locally-serving retail
6. Streamline modeling for remaining projects
7. Attack regional congestion more effectively
8. Reduce future pavement maintenance obligations
9. **Massive public health improvements**



> 21,000 deaths/y attributable to physical inactivity in California

Achieving CA's mode share targets:

- **2,095 fewer deaths annually**
- **\$1 billion-\$15 billion/y prevented premature deaths and disability**

Maizlish N. *Increasing Walking, Cycling, and Transit: Improving Californians' Health, Saving Costs, and Reducing Greenhouse Gases. Final Technical Report to the California Department of Public Health (CDPH).* Berkeley, CA; 2016.

<https://www.cdph.ca.gov/programs/Documents/IncreasingWalkingCyclingTransitFinalReport2016rev2017-01-28.pdf>

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Benefits of VMT as a Measures of Transportation Impact

1. Streamline TOD
2. Streamline infill
3. Streamline transit projects
4. Streamline active transportation projects
5. Streamline locally-serving retail
6. Streamline modeling for remaining projects
7. Attack regional congestion more effectively
8. Reduce future pavement maintenance obligations
9. Massive public health improvements
10. **Reduction in GHG and other emissions**



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Transportation Impacts | X

opr.ca.gov/ceqa/updates/sb-743/index.html#KeyResources

Apps Gmail Drive Docs Calendar Heat Scholar Maps Chron OPR SRM CapAth Other bookmarks

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Key Resources on SB 743: Studies, Reports, Briefs, and Tools

This resource page will be updated as new resources become available. *Last updated: September 29, 2017*

- Transportation Metrics: Disadvantages of LOS and Auto Delay
- Environmental, Health, Fiscal Benefits of VMT Reduction
- VMT Reduction Strategies
- Induced VMT from Highway Capacity
- Automated Vehicles and VMT
- Tools to measure VMT and Access to Destinations
- Housing Affordability and VMT
- VMT Reduction in Rural Areas
- Roadway Pricing
- Traffic Safety

Address comments to chris.ganson@opr.ca.gov.

opr.ca.gov/ceqa/updates/sb-743/index.html#highway-collapse

https://www.opr.ca.gov/docs/Key_Publications_on_VMT.pdf

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Updates to 743 CEQA Guidelines and Technical Advisory

Guidelines

- Use of VMT optional for highway capacity projects

Technical Advisory

- Don't need to analyze freight VMT
- Only the num. of residential units prescribed in SCS can reference city average
- Mixed use projects may examine just the dominant use
- Redevelopment projects: LTS if decrease VMT; otherwise apply recommended thresholds
- New small project threshold
- Recommend studying a reduced-VMT alternative

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Part V. Practitioners Perspective on VMT



A New Era in CEQA Transportation Analysis

- » Traffic and transportation has traditionally been an engineering task
- » Transportation engineering dates to the early 1900s (ITE formed in 1931) with a focus on safety and efficiency
- » LOS to VMT is a paradigm shift
- » Road efficiency to planning/city efficiency

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Models, models, models...

- » **California Emissions Estimator Model (CalEEMod) – 2013**
- » **California Emissions Estimator Model (CalEEMod) – 2016**
- » **California Smart Growth Trip Estimation Tool**
- » **Envision Tomorrow / Envision Tomorrow+**
- » **GreenTrip Connect**
- » **ITE Trip Generation for the Urban Context**
- » **MXD**
- » **Sketch 7**
- » **Urban Emissions Model (URBEMIS)**
- » **UrbanFootprint**
- » **VMT+**
- » **VMT Impact Tool**

Source: <https://ncst.ucdavis.edu/events/webinar-quantifying-vehicle-miles-traveled/>

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Models, models, models...

Sketch Tool	Output	Defensibility	Parameter Sensitivity	Admin. Utility
CalEEMod	VMT	++	+	++
Sketch 7	% Change in VMT	+	+	+
VMT Impact Tool	% Change in VMT	+	+	+
Green TRIP Connect	VMT; Change in VMT	+	+	++
UrbanFootprint	VMT	+++	++	+
Envision Tomorrow	VMT	+	++	+
CA Smart Growth Tool	Trips	++	+	+
URBEMIS 2007	VMT	+	++	+
TRIMMS	VMT	++	++	+
MXD+/MainStreet	Trips; VMT	+++	+++	++
VMT+	VMT	+	+	++
TDM+	% Change in VMT	+++	++	++

Source: Ronald T. Milam, AEP Institute, 2017

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Other VMT complexities that should not keep you up at night

- » Types of Trips
 - Tour-based, Home-based, Non-home-based, Household, etc.
- » Trip Generation Rates
- » VMT Reductions
 - CAPCOA and variability with other references

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CEQA Guidance

- » 15003 (i): CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure.
- » 15151: An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.
- » 15204: The adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors.

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OPR Guidance

Land Use Projects

Streamline low VMT projects

Mitigate high VMT projects

Transportation Infrastructure Projects

Streamline VMT-reducing projects

Streamline projects which increase VMT only marginally

Mitigate projects which substantially increase VMT

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Example Simple VMT Approach for Land Use Projects

- » Either use CSTDM or Regional Model to determine average VMT per person for region/city, VMT threshold (i.e. 15% below average), and VMT by TAZ
- » Use low VMT areas (VMT by TAZ), TPAs, low VMT projects to presume less than significant
- » For analysis:
 - Use CalEEMod with adjusted trip lengths per CSTDM/Regional Model to evaluate and mitigate projects; or
 - Develop programmatic approach using similar tools. (Program must include mitigation framework for high VMT project – e.g. checklist of reductions, TDM programs, VMT fee)

Part X. Closing Message



Closing Message – Keep Current!

- » SACOG Webinar (www.sacog.org)
- » AEP eblasts and Local Events
- » AEP Advanced CEQA Workshop
- » AEP Conference
- » AEP Institute
- » AEP CEQA Portal



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Questions? Answers!



Thank you!



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Overview of the
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Amendments
December 13, 2017