



City of Culver City

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Staff Report

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CC:PC - 1) Presentation of the Travel Demand Forecast Model (TDFM) Project; 2) City Council and Planning Commission Discussion of the TDFM Project; and (3) Planning Commission Adoption of a Resolution Recommending to the City Council Adoption of the Culver City Transportation Study Criteria and Guidelines.

Meeting Date: May 13, 2020

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Fiscal Impact: Yes ☐ No ☒ **General Fund:** Yes ☐ No ☒

Public Hearing: ☐ **Action Item:** ☒ **Attachments:** ☒

Commission Action Required: Yes ☒ No ☐ **Date:** 5/13/20

Public Notification: (E-Mail) Meetings and Agendas - City Council, Planning Commission (05/08/20); Stay Informed - Travel Demand Forecast Model (05/08/20)

Department Approval: Sol Blumenfeld, Community Development Director (04/30/2020)

RECOMMENDATION

Staff recommends 1) the City Council and Planning Commission receive a presentation of and jointly discuss the Travel Demand Forecast Model (TDFM) project; and 2) the Planning Commission adopt a resolution recommending to the City Council adoption of the Culver City Transportation Study Criteria and Guidelines.

BACKGROUND

In 2013, the State of California passed Senate Bill 743 (SB 743), which alters how agencies measure transportation impacts under the California Environmental Quality Act (CEQA). The purpose of the Travel Demand Forecast Model (TDFM) project is to establish new and updated regulations and new tools and fees, including a new travel demand/behavior forecasting model, needed for the City to comply with SB 743. The TDFM project is an inter-departmental effort between the Community Development, Public Works, and Transportation Departments, with critical GIS and data analysis support from the Information Technology Department.

CEQA requires review and disclosure of environmental impacts caused by projects that are not categorically exempt from review, and to avoid or mitigate those impacts if feasible. When passed, SB 743 directed the Governor's Office of Planning and Research (OPR) to develop guidelines for an alternate metric to level of service (LOS) to evaluate transportation environmental impacts under CEQA, consistent with SB 743's intent. The intent for cities, as lead agencies

under CEQA, is to establish thresholds, develop mitigations, and evaluate transportation impacts with metrics that support the reduction of greenhouse gas (GHG) emissions, development of multimodal transportation networks, and diversification of land uses to promote statewide goals of public health, infill, and GHG reduction. While it is not required, CEQA encourages lead agencies to formally adopt thresholds of significance.

In 2018, OPR released guidelines in its Technical Advisory on Evaluating Transportation Impacts in CEQA (Attachment 1). The advisory recommends vehicle miles traveled (VMT) as the most appropriate metric and provides technical advice on assessing impacts and establishing significance thresholds and mitigation measures based on VMT. Starting July 1, 2020, all lead agencies must use VMT, and cannot use LOS, to analyze transportation impacts under CEQA, to comply with SB 743.

While LOS was the default metric for determining transportation environmental impacts for many years, it is a vehicle operation focused measure that does not support statewide sustainability goals and can no longer be used to comply with CEQA. Cities can still use LOS for their local development review process to inform site access and traffic operations, outside of the environmental review process.

In addition to responding to SB 743, another reason to complete the project now is that the City is currently updating its General Plan, and the model will inform the preparation, impact analysis, and adoption of the updated General Plan.

DISCUSSION

New and updated regulations and new tools and fees were developed for the City to comply with SB 743 as part of the TDFM project, as summarized below and detailed in the following sections.

The City's transportation study regulations were updated, falling into the following categories:

- New VMT screening, impact thresholds, and mitigation options, to comply with CEQA
- Updated LOS requirements, no longer subject to CEQA
- Updated non-LOS/VMT requirements, not subject to CEQA

New tools developed to evaluate VMT impacts:

- Travel behavior/demand forecast model
- Project-level evaluation tool

New and updated fees developed to support the new regulations:

- VMT impact fees
- Transportation study review fees

The existing 2012 Traffic Study Criteria for the Review of Proposed Development Projects within the City of Culver City¹ (Attachment 2) will be replaced by the Culver City Transportation Study Criteria and Guidelines (Attachment 3), which will reflect these changes.

City Transportation Study Regulations

New CEQA VMT Screening Thresholds

The recommended VMT screening thresholds are based upon guidance from the OPR Technical Advisory, input from the City's consultant Fehr & Peers, and City staff's local knowledge. A development project that meets any of the recommended thresholds would be cleared from having to analyze environmental impacts to comply with CEQA, as a less than significant VMT impact would be presumed. These recommendations listed below are based upon modeling criteria and broader policy implications related to development that the City is seeking to encourage along commercial corridors.

1. Small projects resulting in fewer than 250 daily, or 25 peak hour trips²
2. Projects within a ½ mile from key transit priority areas including the Metro E (Expo) Line Culver City Station, Metro E (Expo) Line La Cienega Station, Westfield-Culver City Transit Center, or Sepulveda/Venice Boulevard intersection (Attachment 4)

3. Affordable housing projects (100% affordable projects screened entirely)
4. Local serving retail projects with fewer than 50,000 square feet in size at a single store³

New CEQA VMT Impact Thresholds

VMT impact metrics are needed to calculate and evaluate a project's environmental impacts for transportation if they exceed the screening thresholds. If a project's impacts exceed the VMT impact thresholds, then measures would be required to mitigate the impacts to a less than significant level, to the extent feasible, or pay an in-lieu fee. City staff recommends the following metrics and thresholds which comply with State guidelines in the OPR Technical Advisory:

1. For residential development: Daily home-based VMT/Capita - 15% below existing levels
2. For office development: Daily home-based-work VMT/Employee - 15% below existing levels
3. For regional serving retail development: Total VMT - Any net positive change in citywide VMT

Updated LOS Criteria for Operational Analysis Not Subject to CEQA

LOS as a metric will continue to be utilized to assess the ability of the circulation system to accommodate additional traffic generated by projects. If the project results in deteriorated LOS, potential measures to improve the conditions caused by the project could be needed. Potential measures to address project conditions are described in the Transportation Study Criteria and Guidelines.

Updated Non-VMT/LOS Criteria for Other Project Features not Subject to CEQA

Requirements and guidelines are also provided in the Transportation Study Criteria and Guidelines to assess project effects on pedestrians, cyclists, transit, driveways, allocation of curb space, parking, safety, and traffic during construction.

New VMT Evaluation Tools

Both the model and project-level VMT tools are used to evaluate VMT impacts, but they serve distinct purposes.

Travel Behavior/Demand Forecasting Model

Models are computer programs that simulate traffic levels and travel patterns for a specific geographical area consisting of inputs that summarize the area's land uses, socioeconomic characteristics, street network, travel characteristics, and other key factors. Using that data, the model performs a series of calculations that can produce output related to:

- Vehicle trips
- Vehicle trip lengths
- VMT
- Origin - destination patterns
- Data for assessing air quality and noise impacts
- Trip diversion related to street closures or congestion
- Modal split
- Trip purpose

Models are calibrated to a year in which actual land use data and traffic volumes are available and well documented to ensure accuracy. A model is accurately calibrated when it replicates the actual traffic counts on the major roads, within certain ranges of error,⁴ and demonstrates stable responses to varying inputs. The new model is calibrated to 2019 base year conditions using actual traffic counts and cell-phone travel-pattern data, including a detailed inventory of population and employment for current and future conditions in Culver City.

For the updated General Plan, the model will be used as a consistent basis for analyzing projected changes in mobility patterns in response to future land use, transportation infrastructure, and policy assumptions. Improvements will then be identified using those projections to accommodate the changing mobility patterns associated with the preferred land use alternatives. The model can also be used for many purposes beyond shaping CEQA guidelines and analyzing land uses, including:

- Measuring and estimating transportation performance measures
- Understanding travel in and around Culver City

- Developing estimates of VMT for zones and the city as a whole
- Evaluating roadway and transit projects
- Developing a mobility fee program

However, models are generally not suitable for analyzing development projects, as they are not designed to produce accurate localized results. That is the purpose of the project-level tool - to evaluate development projects, which are inherently more granular, may involve more complex land use transportation interactions, and may need mitigation of impacts.

Project-Level Evaluation Tool

A new spreadsheet-based evaluation tool will be used to analyze the transportation environmental impacts of development projects in Culver City (Attachment 5). The tool incorporates VMT screening criteria, impact analysis, and mitigations - providing a consistent data-based method for transportation impact analysis for all development projects. It estimates project-generated VMT per capita and employee, which is compared to the impact thresholds to make an impact determination.

A project's VMT is calculated by combining project trip generation and length. When generating trips, the tool accounts for the benefits of transit proximity, mixed land uses, and urban design. Validated assumptions from Fehr & Peers' Mixed-Use Development Trip Generation model are used, along with data from the travel demand model.

In addition to providing project VMT and determining project impacts, the tool provides a method for mitigating impacts through Transportation Demand Management (TDM) measures.⁵ It quantifies the effectiveness of the mitigation measures based on available data.

New Fees

VMT Impact Fees

New fees based on a project's land use and VMT impact will go into a fee program, for VMT-increasing projects as a form of mitigation similar to an in-lieu fee. The fees will be used to implement a list of VMT-reducing mobility projects identified by the Public Works and Transportation Departments based on anticipated improvements needed over a 20-year horizon. VMT impact fees collected will account for a certain percentage of project costs, with the remainder being funded by grants, City funding sources, other funds, or a combination thereof.

Using the project list and model, Fehr & Peers will conduct a nexus study to document the nexus between the fees being charged, the benefit of the facilities improvements to mitigate new development impacts, and the proportional cost share.⁶ As well, Economic & Planning Systems will conduct an economic analysis of the fee program to ensure that the need to accommodate development impacts is achieved without creating a disincentive for investment and development in Culver City. Approval of the mobility fee, projects list, and the associated nexus study and economic analysis are anticipated to be ready for City Council approval by August/September 2020.

Transportation Study Review Fee

A new administrative processing fee will recover staff costs for project-level review, TDM monitoring and enforcement, periodic updates to the model, and anything else needed to perform adequate project-level VMT analysis. This fee is still being developed and will be presented to City Council at the June 8, 2020 meeting.

Updated Transportation Study Criteria and Guidelines

This document guides developers on what is required to analyze a project's transportation impacts (Attachment 3). It includes an expanded CEQA section on how the VMT transportation impact analysis process should be conducted, based on the new VMT screening, impact thresholds, and mitigations. In addition to CEQA analysis, updated guidance is included on LOS operational analysis and non-VMT/LOS features.

ENVIRONMENTAL ANALYSIS

CEQA does not consider adopting thresholds of significance or administrative actions a project. The proposed Culver City Transportation Study Criteria and Guidelines (and the thresholds therein) is exempt from CEQA review, as it is not considered a "project" (CEQA Guidelines sections 15378, 15064.7 and 15060(c)(3)); will not result directly or indirectly in

significant environmental impacts (CEQA Guidelines section 15061(b)(3)); and is ministerial as the City is mandated to adopt it (Public Resources Code section 21080(b)(1)). As such, Culver City Transportation Study Criteria and Guidelines and the thresholds therein are categorically exempt pursuant to CEQA Guidelines section 15308 and none of the exceptions in 15300.2 apply.⁷

NEXT STEPS

1. June 8: City Council considers approval of TDFM and related components.
2. July 1: VMT must be used in CEQA transportation impact analyses statewide.
3. August/September TBD: City Council considers approval of new VMT impact fee, supported by a nexus study and economic analysis.

FISCAL ANALYSIS

None.

ATTACHMENTS

1. 2020-05-13_ATT_OPR Technical Advisory on Evaluating Transportation Impacts in CEQA
2. 2020-05-13_ATT_Existing Traffic Study Criteria for the Review of Proposed Development Projects within the City of Culver City
3. 2020-05-13_ATT_Proposed Culver City Transportation Study Criteria and Guidelines (revised and renamed Attachment 2)
4. 2020-05-13_ATT_VMT transit priority areas map
5. 2020-05-13_ATT_Proposed project-level VMT tool dashboard
6. 2020-05-13_ATT_Proposed Planning Commission Resolution

MOTION

That the City Council and Planning Commission:

Receive a presentation of and jointly discuss the Travel Demand Forecast Model (TDFM) project.

That the Planning Commission:

Adopt a resolution recommending to the City Council adoption of the Culver City Transportation Study Criteria and Guidelines.

NOTES

1. 2020-05-13_ATT_Staff recommends changing the title to, 'Culver City Transportation Study Criteria and Guidelines' for accuracy.
2. The recommended thresholds screen small projects with less than 250 daily trips, which is more stringent than the City's current 500 daily trip threshold, but less stringent than the State recommended threshold of 110 daily trips. The City's current threshold for small projects allows staff to ask for a study even if a project clears the threshold based on conditions identified.
3. For mixed use projects, only the retail components would be screened, and any other components not screened out would still require VMT analysis.
4. 2017 California Regional Transportation Guidelines for Metropolitan Planning Organizations (California Transportation Commission, January 2017)
5. TDM is a set of strategies aimed at maximizing traveler choices. Managing demand is about providing travelers, regardless of whether they drive alone, with travel choices, such as work location, route, time of travel, and mode.
6. The Mitigation Fee Act, California Government Code §66000, et seq. (also known as Assembly Bill (AB) 1600),

requires the preparation of a nexus study.

7. In 2013, this determination was reaffirmed in the First District Court of Appeal, Division Five's finding on *California Building Industry Association v. Bay Area Air Quality Management District*.