



Summary of Changes Memorandum

Date: February 14, 2019
To: Record No. 2015-012094GEN
Prepared by: Wade Wietgreffe, Transportation Review Team Manager
RE: **Transportation Impact Analysis Guidelines Update: Summary of Changes**

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

INTRODUCTION

The Environmental Planning division within the Planning Department reviews projects for potential impacts on the environment, a process known as environmental review. The department conducts environmental review pursuant to the California Environmental Quality Act (CEQA). As part of environmental review, the department reviews background technical studies, such as transportation impact studies, to assess a project's effects on the physical environment.

To assist in the preparation of transportation impact studies, the department provides to consultants and city staff a guidance document, the Transportation Impact Analysis Guidelines. The department previously comprehensively updated the guidelines in 2002, which updated and revised the Guidelines for Environmental Review: Transportation Impacts (July 1991) and Interim Transportation Impact Analysis Guidelines for Environmental Review (January 2000). Although the department updated smaller components of the guidelines since 2002,¹ the department recently completed its first comprehensive update to the guidelines since then.

This Summary of Changes memorandum provides an overview of the changes to the criteria and methodologies presented in the guidelines and subsequent guidance from the department between 2002 and 2016 (collectively, "prior guidelines") and those presented in this comprehensive guidelines update (also referred to as "2019 guidelines"). The memo provides an overview of the process for and summary table to present changes. Appendix A provides more details regarding the rationale for some of these changes.

The primary intended users of these guidelines are city staff and professional consultants who are well versed in CEQA. Project sponsors, members of the public, and decision-makers also may find the guidelines to be informative and may wish to understand how the department's approach to transportation impact analysis has changed with this comprehensive update.

Furthermore, the guidelines are not intended to be exhaustive to cover every potential scenario that could be encountered in the process of evaluating a project's transportation-related impacts. The department will use the guidelines to develop individual transportation study scopes of work tailored to the complexity of transportation issues associated with specific projects. Once the department approves a scope of work, the specific direction contained within that scope will provide more details than that which appears in the guidelines.

¹ Subsequent guidance includes items such as technical inputs into transportation modeling tools, clarifications regarding criteria, and approaches for cumulative impact analysis or projects within area plans. This department issued this guidance to consultants via emails or memoranda.

More information about the guidelines is available here: <https://sf-planning.org/transportation-impact-analysis-guidelines-environmental-review-update>.

GUIDELINES UPDATE PROCESS

The department’s transportation impact analysis in CEQA documents has progressed over the last 17 years. The department is at the forefront of an ever-evolving field of transportation by comprehensively working to address such impacts from new development, as demonstrated by the legislative success in 2015 to 2017 of all three components of the Transportation Sustainability Program.² For the comprehensive guidelines update, the majority of the effort was focused on the transportation review process and assessing the reasonableness of the data used to estimate the number, type, and location of trips to and from a development (i.e., travel demand) and the criteria for assessing transportation impacts (i.e., significance criteria). Other details contained within the update are a result of this focus (e.g., methodology). Below is a time line detailing the milestones from this process.



Vehicle Miles Traveled (VMT) Resolution

While not officially part of the guidelines update, the process started when, in March 2016, the Planning Commission unanimously a resolution that directed the department to remove automobile delay as a factor in determining significant impacts pursuant to CEQA and replace it with vehicle miles traveled (VMT) criteria. This resolution was a component of the Transportation Sustainability Program. In doing so, San Francisco became the first county in California to adopt such criteria. In January 2019, the state adopted changes to CEQA Guidelines that requires all agencies to use VMT as a CEQA criteria by July 2020.

Travel Demand

In mid-2016, the department contracted with a transportation consulting firm, Fehr &Peers, to develop a methodology for collecting data and updating the travel demand methodology used in the guidelines. Fehr & Peers collected and analyzed counts, intercept surveys (i.e., intercept people to ask questions), and commercial and passenger loading at San Francisco development sites in 2016 and 2017 and analyzed 2012 California Household Travel Survey data. Fehr & Peers completed their scope in mid-2018.

Outreach and Communications

The department hosted a guidelines update kick-off meeting on July 27, 2017 with several local and regional government agencies and environmental planning and transportation planning consultants. The department provided an overview regarding the guidelines update and solicited feedback on key questions

² Refer to <http://sf-planning.org/transportation-sustainability-program> for more details.

as they relate to CEQA. At that meeting, the department also distributed a survey for the same stakeholders to complete by August 25, 2017.

The department held an informational hearing at the Planning Commission on September 28, 2017. At that hearing and until November 3, 2017, the department sought feedback on the scope of the guidelines update from the commission, consultants, and the public. The department also held several one on one conversations with transportation consultants and local government agencies. In addition, in October 2017, the department, the San Francisco Municipal Transportation Agency, and the San Francisco County Transportation Authority signed a charter committing each other to collaborate on the guidelines update. On December 27, 2017, the department summarized verbal and written comments received to date in a memorandum published online and distributed to kick-off meeting invitees. The summary also included comments received outside the guidelines update process, which the department may have received from the planning commission, board of supervisors, or the public at public hearings or in written form as part of a project's environmental review process.

In 2018, the department posted online a series of memoranda that provided updates to the topics within the guidelines. Prior to releasing the final memoranda, the department distributed draft versions with partner charter agencies and consultants to solicit feedback on their content. The department also hosted three workshops with consultants to go over those draft versions. The final 2019 guidelines reflect the collective feedback from this outreach process.

GUIDELINES UPDATE SUMMARY OF CHANGES

At the end of this comprehensive guidelines update, the department reached three major conclusions. First, our transportation review process could use clarity regarding different steps within it, which the comprehensive guidelines update attempts to resolve. Second, the data the department used to previously estimate trips generally *overestimated* the number of vehicle trips to and from a site, even accounting for the increase of for-hire vehicles. Lastly, the criteria used to previously assess transportation impacts *generally align* with the environmental impacts that San Francisco visitors, residents, and employees tend to be concerned with as reflected in adopted city plans, policies, and ordinances. Therefore, in most instances, the department clarified language within the prior criteria, instead of extensive replacement. Exceptions to this statement are shown in Table 1.

The department consolidated impact analysis for two criteria, instead of by individual topic (e.g., walking, bicycling). This consists of consolidating all "potentially hazardous conditions" criteria under one significance criteria and all "accessibility" criteria under another significance criteria. Many consultants suggested this because of the connection between the analyses across individual topics and to simplify the analysis. This consolidation is not shown in table 1 below but is shown on page 7 of the guidelines.

Table 1 summarizes changes the department made between the prior and 2019 guidelines. Appendix A provides more details regarding the rationale for some of these changes.

Table 1: Summary of Changes between Prior and 2019 Guidelines

Topic	Criteria – Would the project: (strike through and <u>underline</u> showing differences between prior and 2019 guidelines)	New Methodology	Notes	Reference	
				Prior Guidelines	2019 Guidelines
Transportation Review Process	n/a	n/a	The new process consists of six steps, including inter-divisional and inter-agency consultation that transportation review may require.	Pages 1 – 5 and appendix A	Page 3 and appendix A
Travel Demand	n/a	A consulting firm collected and analyzed counts, intercept surveys (i.e., intercept people to ask questions), and commercial and passenger loading at San Francisco development sites in 2016 and 2017 and analyzed 2012 California Household Travel Survey data.	The travel demand update estimated the number of people taking for-hire vehicles (e.g., taxis, transportation network companies) for the first time. In general, relative to prior estimates, the new estimates of ways people travel are generally lower for overall vehicular travel, accounting for for-hire vehicles, and higher for walking trips.	Pages 9 – 10 and appendices C, D, and E	Pages 11 – 13 and appendix F
Walking/Accessibility	result in substantial overcrowding on public sidewalks? create potentially hazardous conditions for pedestrians <u>people walking</u> ? otherwise interfere with pedestrian accessibility of people walking to and from the project site and adjoining areas?	The new methodology is like prior guidelines but is more descriptive.	This topic addresses impacts to people walking, including people with disabilities that may or may not require personal assistive mobility devices. The department deleted the substantial overcrowding criterion and now only considers capacity-related impacts as significant if they result in potentially hazard conditions to people walking. This deletion is consistent with state guidance regarding not treating addition of new users as an adverse impact.	Page 14	Various pages and appendix G
Bicycling	create potentially hazardous conditions for bicyclists <u>people bicycling</u> ? otherwise interfere with bicycle accessibility of people bicycling to and from the project site and adjoining areas?	The new methodology is like prior guidelines but is more descriptive.	none	Pages 14 – 15	Various pages and appendix H
Public Transit	create a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service? cause a substantially increase in delays or operating costs such that significance adverse impacts in public transit service levels could result? <u>create potentially hazardous conditions for public transit operations?</u>	The new methodology includes a quantitative threshold of significance for public transit delay that revises the prior guidelines threshold. The new methodology includes screening criteria for the first time to assess whether significant public transit delay impacts could occur. The new methodology addresses potentially hazardous conditions.	The department deleted the transit capacity criterion to be consistent with state guidance regarding not treating addition of new users as an adverse impact and to reflect funding sources for and policies that encourage additional ridership. The 2019 guidelines public transit delay threshold of significance uses the adopted City Charter Section 8A.103 85 percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.	Pages 11 – 12 and appendix F	Various pages and appendix I
Emergency Access	result in inadequate emergency access?	The new methodology identifies the geographic area in which inadequate emergency access could occur, which was missing from the prior guidelines. The geographic area includes the project site or surrounding area and emergency operator facilitates within the study area.	none	n/a; subsequent guidance only	Various pages and appendix J

Topic	Criteria – Would the project: (strike through and <u>underline</u> showing differences between prior and 2019 guidelines)	New Methodology	Notes	Reference	
				Prior Guidelines	2019 Guidelines
Loading	result in a loading deficit demand during the peak hour of loading activities that could not be accommodated within proposed on-site loading facilities or within convenient on-street loading zones and <u>the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving or result in significant substantially delays affecting traffic, public transit, bicycles or pedestrians?</u>	The new methodology is like prior guidelines but is more descriptive. For example, the new methodology defines a loading deficit and the geographic area of convenient loading facilities. The new loading methodology also includes commercial and passenger loading at various land uses.	The prior guidelines only addressed passenger loading from taxi demand at hotel uses. The 2019 guidelines include passenger loading from for-hire vehicles (i.e., transportation network companies and taxis) at various land uses.	Pages 15 – 16 and appendix H	Various pages and appendix K
Vehicle Miles Traveled / Induced Automobile Travel	<u>cause substantial additional vehicle miles traveled? substantially induce automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network?</u>	The new methodology includes a quantitative threshold of significance for both significance criteria. The new methodology includes VMT map-based and other screening criteria to assess whether significant VMT impacts could occur.	The 2019 guidelines are consistent with resolution 19579, adopted by the Planning Commission on March 3, 2016, which introduced VMT criteria as a consideration in CEQA.	n/a	Various pages and appendix L
Driving Hazards	<u>cause create potentially major traffic hazardous conditions for people driving?</u>	The new methodology is like prior guidelines but is more descriptive.	none	n/a; subsequent guidance only	Various pages and appendix M
Automobile Delay	<u>cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system or conflict with an applicable congestion management program related to level of service (LOS) standards?</u>	n/a	The 2019 guidelines are consistent with resolution 19579, adopted by the Planning Commission on March 3, 2016, which removed automobile delay as a consideration in CEQA.	Pages 10 – 11 and appendix B	n/a
Construction	<u>require a substantially extended duration or intense activity; and the effects would create potentially hazardous conditions for people walking, bicycling, or driving, or public transit operations; or interfere with emergency access or accessibility for people walking or bicycling; or substantially delay public transit?</u>	The new methodology is like prior guidelines but is more descriptive. The new methodology includes screening criteria for the first time to assess whether the project would result in substantially extended duration or intense activity.	none	Page 16	Various pages and appendix N
Vehicular Parking	result in inadequate parking capacity? (until 2009) and result in secondary impacts from an unmet parking demand? a substantial vehicular parking deficit and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling or inadequate access for emergency vehicles; or substantially delay public transit?	The new methodology includes screening criteria for the first time to assess whether a substantial parking deficit could occur. The new methodology is like prior guidelines but is more descriptive. For example, the new methodology defines a substantial vehicular parking deficit and the geographic area of convenient parking facilities.	The new methodology acknowledges that people demand to access destinations and there is no inherent “parking demand”. While it includes estimates of parking demand, based on available data, it acknowledges many variables affect whether that could affect travel behavior. For those rare projects that warrant a parking demand analysis, the department will consider different variables for estimating demand.	Pages 12 – 13 and appendix G	Appendix O

Note: not shown in the table are 2019 guidelines appendices B (updated process and style guide), C (project description), D (cumulative conditions adjustments), E (sample queue abatement language), and P (supplementary guidance).

Appendix A: Additional Details

INTRODUCTION

This appendix provides more details regarding the rationale for changes between the 2002 guidelines or subsequent guidance from the department between 2002 and 2016 (collectively, “prior guidelines”) and the 2019 guidelines for the following topics:

- Travel Demand
- Walking/Accessibility
- Public Transit
- Vehicle Miles Traveled/Induced Automobile Travel and Automobile Delay
- Vehicular Parking

Travel Demand

To assess impacts, the prior guidelines approach included estimates of travel demand. This included estimation of how many trips people in proposed development projects may take, the ways they would travel, and their common destinations based on several sources. Among these sources, the prior guidelines relied on the findings of the Citywide Travel Behavior Survey - Employees and Employers (May, 1993); the Citywide Travel Behavior Survey - Visitor Travel Behavior (August, 1993); revolving five-year estimates from US Census, American Community Survey data; San Francisco County Transportation Authority San Francisco Chained Activity Model, which is based upon, among other sources, observed behavior from California Household Travel Survey (2010-2012), and major San Francisco transportation studies. The prior guidelines methodology quantified commercial loading demand for freight and delivery service for a variety of land uses and passenger loading demand for hotel uses only.

For the comprehensive guidelines update, the department contracted with a transportation consulting firm, Fehr & Peers, to develop a methodology for collecting data and updating the travel demand methodology used in the guidelines. Fehr & Peers collected and analyzed the following data:

- The number of trips people take using 24-hour person counts at 65 developments across San Francisco (11 office, 9 hotel, 27 retail, and 19 residential sites) on a typical fall 2016 or spring 2017 weekday
- The way people travel using PM peak period (3 PM – 7 PM) intercept surveys (i.e., intercept people to ask questions) at those 65 developments on a typical fall 2016 or spring 2017 weekday
- The common origins and destinations of travel using 2012 California Household Travel Survey data (5,000 trips records starting or ending in San Francisco)
- Commercial and passenger loading, using 24-hour time lapse recordings, at one designated loading zone for 41 sites on a typical fall 2016 or spring 2017 weekday

In summary, the travel demand update resulted in:

- New trip generation rates generally similar to or lower than prior rates
- Estimates of people walking, riding transit, and driving for three place types: urban high density, urban medium, and urban low density
- Estimates of peopling taking for-hire vehicles (taxis and transportation network companies) or private shuttles or bicycling for the above three place types
- Updated boundaries of common origins and destinations within San Francisco, including ability to distribute auto and transit trips across nine San Francisco neighborhoods

- New methodology and estimates for passenger loading for several land uses

The travel demand update estimated the number of people taking for-hire vehicles for the first time. In general, relative to prior estimates, the new estimates of ways people travel are generally lower for overall vehicular travel, accounting for for-hire vehicles, and higher for walking trips.

Walking/Accessibility

The prior guidelines required an assessment of whether a project would result in substantial overcrowding on public sidewalks. The prior guidelines identified a methodology, using level of service, to determine if significant impacts could occur. For example, if a project resulted in the sidewalk level of service to change from D to E, the project may result in a significant overcrowding or sidewalk capacity impact.

For the comprehensive guidelines update, the department deleted the substantial overcrowding criterion and now only considers capacity-related impacts as significant if they result in potentially hazard conditions to people walking. This approach conforms with the Governor's Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, November 2017:

Because criteria for determining the significance of transportation impacts must promote the development of multimodal transportation networks, lead agencies should consider project impacts to transit systems and bicycle and pedestrian networks...When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new users as an adverse impact.

In addition, in 2010, San Francisco adopted the Better Streets Plan, which governs the design, location, and dimensions of all streetscape features and improvements for people who walk in the public right-of-way. The Better Streets Plan includes criteria for the appropriate type and size of sidewalks, based on adjacent land uses, to enhance the experience of people who walk. Furthermore, since 2002, San Francisco adopted many area plans and the Transportation Sustainability Fee. As part of these area plans and the Transportation Sustainability Fee, impact fees from new development go towards complete street changes, including sidewalk capacity.

While those fees and plans were not adopted as CEQA mitigation, in general, projects that meet the minimum sidewalk width identified for their applicable street type in the Better Streets Plan would provide adequate sidewalk capacity for people who walk. The Better Streets Plan includes streetscape guidelines to provide sufficient through-width for people traveling along sidewalks and meet Americans with Disabilities Act accessibility requirements. The department may require a project to meet a minimum sidewalk width for a street type different than the one identified under the Better Streets Plan to avoid a potentially hazardous condition, if the applicable street type does not match the intensity of a proposed development (e.g., a special use district of increased intensity in an industrial street type location).

Public Transit

The prior guidelines required an assessment to determine if a project would result in a substantial increase in transit demand that could not be accommodated by adjacent transit capacity. The prior guidelines identified a methodology, using capacity utilization, to determine if significant impacts could occur. For example, if a project resulted in capacity utilization to exceed a Muni or regional performance standard for

sitting and standing riders within a screenline, corridor, or individual line, the project may result in a significant public transit capacity impact.

For the comprehensive guidelines update, the department deleted the public transit capacity-related impacts significance criterion. This approach conforms with the Governor's Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, November 2017 (see walking/accessibility, above) because it does not treat the addition of new users on the transit system as a significant impact. Furthermore, since 2002, San Francisco has adopted additional funding sources to address transit capacity demand associated with new development or population growth, although they were not adopted as CEQA mitigation. This includes area plans (various years), the Transportation Sustainability Fee (December 2015), and Proposition B (November 2014). The former two establish impact fees from new development that is used to fund expansion and reliability improvements for transit service, with some fees allocated to both local and regional transit providers. Proposition B (Charter section 8A.105) establishes a base amount of set aside funds provided to the SFMTA, with yearly adjustments based on population growth. It also mandates that the SFMTA use 75 percent of the increase in the base amount funds "to make transit system improvements to the Municipal Railway to improve the system's reliability, frequency of service, capacity, and state of good repair."

Lastly, San Francisco adopted numerous policies to encourage transit ridership in addition to its existing Transit First Policy. Those policies include the area plans (various years) and the Transportation Demand Management Program (adopted 2017). If a project would result in substantial public transit ridership increases that could not be accommodated by transit capacity planned by the city or the project, the department will consider this in estimating travel demand for the project (e.g., less transit riders than a typical methodology would estimate).

The department now considers potentially hazardous conditions for public transit operations as a separate transit significance criterion. This approach is consistent with other transportation topics (e.g., walking/accessibility, bicycling) and SFMTA's 2018 Strategic Plan Objective 1.2 of improving the safety of the transportation system.

Vehicle Miles Traveled/Induced Automobile Travel and Automobile Delay

The prior guidelines required an assessment of whether a project would result in a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (i.e., automobile delay). The prior guidelines identified a methodology, using level of service, to determine if significant impacts could occur. For example, if a project resulted in the vehicular level of service to change from D to E at a stoplight-controlled intersection, the project may result in a significant automobile delay impact. The prior guidelines did not analyze vehicle miles traveled or induced automobile travel.¹

On March 3, 2016, the Planning Commission adopted resolution 19579, which found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality. The resolution also directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update the

¹ Although other impact topics used this vehicle miles traveled as an input for assessing impacts (e.g., regional air quality).

Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.² Consistent with this resolution, the 2019 guidelines do not include automobile delay.

Planning Commission adopted resolution 19579 also directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with vehicle miles traveled (VMT) criteria which promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses; and consistent with proposed and forthcoming changes to the CEQA Guidelines by Office of Planning Research. Consistent with this resolution, the 2019 guidelines include VMT map-based and other screening criteria, analysis, and methodology. If the project meets the screening criteria, no significant VMT impacts would occur (most projects) and the VMT analysis is complete.

Vehicular Parking

While CEQA included inadequate parking capacity as a question to consider up until 2009, the prior guidelines found that, in the transit-rich urban context of San Francisco, parking loss or deficit in and of itself does not result in direct physical changes to the environment. In other words, the social inconvenience of a person searching in their vehicle for an available parking space is not an environmental impact under the purview of CEQA; instead, the secondary effect of this search in relation to other topics could be an environmental impact.³

As part of amendments in 2009, the California Secretary of Natural Resources Agency removed inadequate parking capacity from the checklist form set forth in Appendix G of the CEQA Guidelines. In 2013, Governor Brown signed California Senate Bill 743, which affected parking analysis through legislation. Specifically, the senate bill stated that, effective January 1, 2014, parking (and aesthetics) shall not be considered significant impacts on the environment for residential, mixed-used residential, or employment center projects on an infill site within a transit priority area, as defined in CEQA.

Consistent with this history, the 2019 guidelines do not include parking, by itself, as a significant impact. Instead, the department assesses whether a parking deficit could occur using screening criteria (like VMT screening criteria, which most projects would meet) and, if a project does not meet screening criteria, the potential for secondary impacts. For the purposes of these guidelines, secondary parking impacts refers to topics within transportation (i.e., potentially hazardous conditions, accessibility, and public transit delay), but could also refer to other topics (i.e., air quality, noise).

² For more information on the history of automobile delay and vehicle miles traveled analysis in San Francisco, refer to San Francisco Planning Department, "Executive Summary, Resolution Modifying Transportation Impact Analysis", March 3, 2016 and San Francisco Planning Department, "California Environmental Quality Act: Vehicle Miles Traveled, Parking, For-Hire Vehicles, and Alternatives", February 23, 2017.

³ For more information on the history of vehicular parking analysis in San Francisco, refer to San Francisco Planning Department, "California Environmental Quality Act: Vehicle Miles Traveled, Parking, For-Hire Vehicles, and Alternatives", February 23, 2017. That document cites two relevant court cases. Another court case since department issuance of that document is *Covina Residents for Responsible Development v. City of Covina* (2018) 230 Cal.Rptr.3d 550. In *Covina*, the court quoted an earlier court case in San Francisco and confirmed that projects that meet the criteria in California Senate Bill 743 only need to address secondary parking impacts.