



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

Appendix P Supplementary Guidance Memorandum

Date: February 14, 2019
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RE: **Transportation Impact Analysis Guidelines Update, Supplementary Guidance**

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INTRODUCTION

This memorandum provides supplementary guidance for situations that may occur during the development of a project's transportation analysis. The memorandum is intended as supplementary guidance already provided in the California Environmental Quality Act (CEQA) and the San Francisco Planning Department's Transportation Impact Analysis Guidelines and Environmental Review Guidelines. Situations are provided below along with information for how to address.

The organization of the memorandum is as follows:

- 1) Existing Land Use/Trip Credits
- 2) Near-term Baseline
- 3) Cumulative
- 4) Identification of Mitigation Measures
- 5) Alternatives
- 6) Variants
- 7) Compliance/Informational Analysis
- 8) Changes to Guidelines
- 9) Uncertainties

1. EXISTING LAND USE/TRIP CREDITS

Pursuant to the guidance outlined below, it is sometimes appropriate to use trip credits in a transportation analysis. Trip credits should generally be based on actual observed data (e.g. counts and intercept surveys), not on guidelines rates and mode splits. The department should confirm all trip credits prior to collection of data. Net new trips would be derived as follows:

Calculate additional trips for the project (for daily and p.m. peak hour)
– existing observed trips (from actual counts)
= net new trips

Some cases may warrant taking trip credits for historic conditions. Pursuant to CEQA Guidelines section 15125, the lead agency may define existing conditions by referencing historic conditions or conditions expected when the project becomes operational, or both, that are supported with substantial evidence. The intent is to provide the most accurate picture possible of the project's impacts when it becomes operational.

Use of trip credits for historic conditions must be developed and documented in consultation with the department.

The following general categories are intended to provide guidance regarding trip credit application:

Commercial: For project sites that are not vacant or were occupied until recently, adjustments to calculated daily and p.m. peak hour project-generated additional person trips may be made to account for the existing activities on the project site. Whenever feasible, any such adjustment should be based on conducting counts of actual existing commercial trip-making at the project site per specific direction from department staff. Unless surveys of existing modal splits and distributions are available or conducted, appropriate modal splits and distributions should be applied for the geographic area in which the project site is located in order to estimate net changes for each mode (e.g. vehicles, transit, walking, or other). Whenever it would be impractical to conduct actual counts of existing commercial trip making activity at a project site, procedures for estimating and netting out existing trips shall be developed in consultation with department staff.

Note that that any net new expansion of the existing commercial use under a project shall not be given trip credit.

Residential: Applying trip credits for residential uses may be appropriate if a project proposes to remove existing residential uses. In cases of existing or recently discontinued residential uses proposed to be replaced by any type of new project, department residential trip rates and appropriate modal split/distribution census tract data based should be applied to estimate existing trips. Net new trips should, in turn be derived by subtracting existing trips from new trips estimated to be generated by the project.

Note that any net new expansion of the existing residential use (measured in terms of bedrooms per dwelling units) shall not be given trip credit.

Parking: If a project proposes to replace an existing or recently discontinued parking facility, netting out existing trips linked to the parking facility is generally not appropriate. Some exceptions to this rule may be in circumstances when a project would replace the underlying land use which accounts for users of the associated parking facility, or for the situations described in the vehicular parking and vehicle miles traveled memoranda related to accounting for variables such as site-specific transportation demand management measures.

The department acknowledges that circumstances may arise that do not fit into one of the aforementioned categories; in these cases, you should consult early with the department. Refer to Attachment A for examples of project analyses which have applied trip credits.

2. NEAR-TERM BASELINE

In some circumstances, it may be appropriate to analyze a near-term (also known as adjusted, future, or modified) baseline¹ as the existing plus proposed project impact analysis may not accurately reflect the conditions that will exist at the time the project's impacts actually occur. Therefore, an existing plus project analysis could be misleading or without informative value to the public and decision makers and analyzing a future baseline is warranted to clearly facilitate understanding of the project's impacts.

At the time analysis commences, near-term baseline conditions shall only include development or infrastructure projects that are under construction; or infrastructure projects that are approved (defined as obtaining all relevant approvals by governing entities/bodies) AND funded. For cases where projects are approved AND partially funded, the planning department will determine on case-by-case basis if analysis of a near-term baseline is appropriate. Examples of circumstances for applying a near-term baseline include projects that need to reflect designs of roadway restriping and curb modification projects or under construction development driveway locations. As a point of clarification, analysis of a near-term baseline is a different than cumulative scenario. A cumulative scenario analyzes a combination of the proposed project and the impacts of other projects. A near-term baseline analysis addresses the project's operational impacts alone, assuming the completion of another project.

If using a near-term baseline, the transportation analysis requires a description of existing conditions. The near-term baseline conditions section must list the development projects and infrastructure projects included in the near-term baseline conditions and explain the rationale for using the near-term baseline condition. The section then must describe the anticipated near-term baseline conditions by transportation topic (e.g., walking, bicycling, public transit²), using reliable projections to the extent applicable, if the conditions will change between existing and near-term baseline conditions. The impact analysis will then use the near-term baseline conditions for a comparison of project impacts, as opposed to existing conditions. Refer to Attachment B for examples of project analyses which used a near-term baseline condition.

3. CUMULATIVE

Refer to methodology – cumulative in the transportation impact analysis guidelines for a discussion regarding the typical cumulative methodology. As described there, for future year VMT estimates, traffic volumes, and transit service and ridership, the methodology typically relies on projections of travel demand model outputs, such as the San Francisco County Transportation Authority San Francisco chained activity modeling process. Attachment C of this memorandum includes the documentation (e.g., model inputs) for prior modeling versions. The department will update the attachment as new documentation becomes available for future modeling versions, typically every one to four years (i.e., frequency of major new area plans or projects). For those topics that rely on modeling outputs, the cumulative methodology should cite to the relevant prior modeling version instead of describing inputs in detail.

¹ Projects currently undergoing construction at the start of environmental analysis are considered part of the project's existing condition and full buildout of the project should be assumed as part of the near-term baseline condition.

² The near-term baseline condition should use the latest SFMTA fleet plan for assumptions regarding transit service by applicable near-term baseline year.

Also described in the methodology – cumulative in the transportation impact analysis guidelines, the cumulative methodology must still adjust future year projections, street conditions, or volumes based on reasonably foreseeable projects, typically using a list-based approach, to the extent applicable. The methodology must document rationale for adjustments and describe changed conditions, in consultation with the department.

4. IDENTIFICATION OF MITIGATION MEASURES

If a project results in a significant impact, the analysis must identify if feasible³ mitigation measures exist to reduce impacts. The identification of transportation mitigation measures may involve several steps. The steps must follow CEQA Guidelines section 15126.4(a) and explore, in order, the various types of mitigation defined in CEQA Guidelines section 15370 to the extent applicable. As avoidance and minimization mitigation measures are the most common types of mitigation measures, the following is limited to those types.

The analysis must determine if the project can avoid the impact altogether (e.g., by relocating a driveway). If the impact can be avoided and if the feature is inherent to the project for which the sponsor agrees to implement, the sponsor can update the project description to include this feature. The impact analysis will then reflect the revised project and the analysis will not require mitigation measures.

If the project cannot avoid the impact through implementation of a feature⁴ or the avoidance does not reduce the impact to less-than-significant levels, then the analysis must identify mitigation measures that minimize impacts. Sometimes implementation of mitigation measures falls under the jurisdiction or purview of governmental agencies other than the department (e.g., San Francisco Municipal Transportation Agency (SFMTA) or California Department of Transportation (Caltrans)), requires the approval of private stakeholders, or requires more detailed design/engineering that may come at a later phase. Examples of such measures include the design and construction of crosswalk signals to mitigate a potentially hazardous condition for people walking, or funding of transit enhancements to mitigate substantial delays to public transit.

Feasible mitigation measures only reduce significant impacts if all parties responsible for the mitigation measure can commit to the implementation of the measure. If the analysis shows that for some reason the implementation of the mitigation measure is uncertain or some of the parties cannot commit to their implementation (e.g., another government entity cannot commit funding), then the impact must remain significant.

As it relates to mitigation measures, the analysis must follow steps 2 through 4 described under impact analysis – existing plus project, construction in the transportation impact analysis guidelines.

If a measure(s) cannot reduce impacts to less-than-significant levels, describe the extent to which the measure does minimize the impacts. In addition, identify other mitigation measures, if available, summarize the process for evaluating those other measures and the reasons for adopting or rejecting them.⁵

³ Pursuant to CEQA Guidelines section 15364, “feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

⁴ To the extent applicable, the alternatives chapter in an environmental impact report should include this feature or document the reasons for its rejection in the alternatives considered but rejected section.

⁵ *Ibid.*

In some instances, the department may request a standalone transportation mitigation measures memorandum. That memorandum will include the same information as included in the analysis, but with more detail. The department may require another government agency to review or prepare the memorandum. Preparation and review of this memorandum may lengthen the transportation review process. Circumstances where the department may request a memorandum include, but are not limited to:

- A mitigation measure could reduce significant transportation impacts, but it is rejected by the city or sponsor as infeasible. The department may request a memorandum if the rejection requires extensive documentation that the analysis can summarize.
- A mitigation measures requires substantial quantitative analysis that the analysis can summarize (e.g., to show whether the measure reduces impacts or has impacts of its own).

Refer to Attachment D for an example of a sample transportation mitigation measures memorandum.

Upon adoption of mitigation measures, the department will forward final applicable measures to the SFMTA and maintain a database of adopted mitigation measures. Refer to changes to guidelines below regarding the process for removing adopted mitigation measures.

5. ALTERNATIVES

CEQA only requires alternatives in environmental impact reports (EIRs). Alternatives to the project must feasibly attain most of the basic objectives of the project, but would avoid or lessen the project's potentially significant physical environmental impacts (CEQA Guidelines section 15126.6). In some circumstances, an EIR may analyze alternatives at equal level of detail (e.g., joint CEQA/National Environmental Policy Act document). In most circumstances, EIRs include an alternatives chapter. The chapter shall describe the approach to developing and conducting an initial assessment of the potential feasibility of alternatives, including those considered but rejected, and enough information about each alternative to allow meaningful evaluation, analysis, and comparison with the project.

For projects with significant and unavoidable transportation impacts, the department may request a standalone transportation alternatives memorandum. That memorandum will include the same information as included in the alternatives chapter, but with more detail. The department may require another government agency to review the memorandum. Preparation and review of this memorandum may lengthen the transportation review process. Circumstances where the department may request a memorandum include, but are not limited to:

- An alternative could reduce significant transportation impacts, but it does not meet most of the basic project objectives or is rejected by the city or sponsor as infeasible. The department may request a memorandum if the rejection requires extensive documentation that the EIR chapter can summarize.
- An alternative requires substantial quantitative analysis that the EIR chapter can summarize.
- Several potentially feasible alternatives, including alternatives prepared to reduce other environmental topics, require analysis.

The format of the alternatives analysis can vary⁶, but should primarily focus on significant transportation impacts caused by the project. If the project did not result in a significant transportation impact for a topic, then the alternatives analysis should be limited for that topic. If an alternative has the potential to result in a significant transportation impact for a topic that the project did not have a significant impact, then the alternatives analysis will require a robust discussion.

Example 1

Follow this example when impact determinations are the same across a transportation topic:

VMT Impacts

Impact TR-5: Operation of both alternatives would not cause substantial additional VMT or substantially induce automobile travel. (*Less than Significant*)

Alternative 1: Describe the impacts of alternative 1 and how it is similar as the project.

Alternative 2: Describe how the impacts of alternative 2 would be similar as alternative 1 and the project.

Example 2

Follow this example when impact determinations are not the same for a transportation topic:

Loading

Impact TR-6 (Alternative 1): Operation of alternative 1 would result in a loading deficit and the secondary effects would create potentially hazardous conditions for people bicycling. (*Significant and Unavoidable with Mitigation*)

Alternative 1: Explain why alternative 1 would result in a significant loading impact, whereas the project would not.

Impact TR-6 (Alternative 2): Operation of alternative 2 would not result in a loading deficit. (*Less than Significant*)

Alternative 2: Describe the impacts of alternative 2 and how it is similar as the project.

6. VARIANTS

A variant modifies limited features or aspects of a project. Examples of variants include different driveway locations, different commercial loading locations (e.g., off-street vs on-street), or a change in the number of vehicular parking spaces. The intent of a variant is to vary a project design feature or aspect and typically not to reduce a significant impact under CEQA. Circumstances where studying a variant may occur include, but are not limited to:

- uncertainty regarding City approvals (e.g., on-street loading)
- requests from neighborhood groups/organizations
- a need to inform project circulation impacts (e.g., noise impacts related to vehicles)
- uncertainty regarding construction methods or phasing

⁶ Some alternatives chapters may group impact analysis by alternative or by impact topic. The examples shown below assume the latter format.

The project description must describe the differences between a variant and the project. If there is no difference in the impacts between the variant and the project, the transportation analysis should note this. If there are differences in impacts between the variant and the project, the transportation analysis must disclose these differences.

Example 1

Follow this example for each topic area when there are no differences in the analysis between the project and variant:

VMT Impacts

Impact TR-5: Operation of the project and variant would not cause substantial additional VMT or substantially induce automobile travel. (*Less than Significant*)

Both the proposed project and variant would not cause substantial VMT because....

Example 2

Follow this example for each topic area when there is a difference in the analysis between the project and variant:

Loading Impacts

Impact TR-6: Operation of the project and variant would not result in a loading deficit. (*Less than Significant*)

Both the project and variant would not result in a loading deficit. However, due to the difference in the loading locations between the two proposals, the following presents project and variant impacts separately.

Project

Variant

Instead of the above format, a separate section or chapter in the analysis could describe in more detail than that in the project description and analyze the impacts of the variant(s) in one location.

7. COMPLIANCE/INFORMATIONAL ANALYSIS

Transportation studies should not include topics unrelated to a project's CEQA analysis (refer to Attachment E for further guidance on compliance/informational topics). The following provides guidance for the appropriate location and if applicable, reviewing entities besides Planning Department staff, for non-CEQA related transportation topics:

SFMTA and other agencies coordination: In some cases, SFMTA or other agencies may request and review non-CEQA related transportation analyses (developed by transportation consultants and paid for by the project sponsor). Examples of non-CEQA related transportation analyses include capacity utilization, station capacity constraints, automobile delay analysis, and parking surveys. Prior to undertaking the study, the project sponsor must provide a scope of work defining the purpose and parameters of the informational analyses to SFMTA and/or other relevant agencies. The transportation impact study should not include such analyses/supplemental reports as appendices/attachments to the transportation impact study, but instead such analyses/supplemental reports should become part of a project's file. Upon completion, these studies can be posted publicly or provided to interested parties (e.g., neighborhood groups).

Compliance with the Planning Code: The transportation impact study or CEQA document may include compliance with the San Francisco Planning Code as an appendix.

Summary of policies (belongs in CEQA chapter of Plans and Policies): The transportation impact study may summarize relevant local, state, and federal transportation plans and policies as an appendix and/or within the Plans and Policies section of an environmental impact report to the extent applicable.

Street Design Consistency: The transportation impact study may describe the project's design for the public right-of-way would be inconsistent with a reasonably foreseeable street design project or plan (e.g., driveway across a proposed bus stop or bicycle facility) as an appendix.

8. CHANGES TO GUIDELINES

This section describes the approach for determining applicability of revisions between the prior guidelines and this update for projects tiering off previous environmental determinations. Refer to the summary of changes memorandum for more details regarding changes between the prior guidelines and this update. Refer to the update process and style guide memorandum for determining applicability of revisions for ongoing transportation reviews.

Overall

If the revised project result in changes to the original project that would obviously not meet CEQA Guidelines criteria for additional environmental review (for example, under sections 15162 and 15183), then the analysis does not need to address the guidelines update changes. For example, if the revised project would result in the same or less vehicle or public transit trips than the original project, then the analysis does not need to address revised public transit delay threshold of significance.

Topics Removed

For this guidelines update, the department removed overcrowding on public sidewalks, public transit capacity utilization, and automobile delay as considerations for determining environmental impacts. For those removed topics, the transportation analysis should note that the topic is no longer discussed under the CEQA framework and cite the relevant decision or guidance document (e.g., state level legislation, Planning Commission Resolution, guidelines update), including the summary of changes memorandum. The transportation analysis should not discuss impacts associated with these removed topics. Separately, if the previous environmental determination included mitigation measures related to the now removed topic and those mitigation measures were included as conditions of project approval, the project sponsor should work with implementing agencies to determine mitigation measure applicability.⁷

Revisions and Additions

For this guidelines update, the department slightly revised significance criteria for several topics and the threshold of significance for public transit delay. In addition, the department added significance criteria for potentially hazardous conditions for public transit operations and vehicle miles traveled. For those topics, the analysis should follow the following steps:

- 1) note the revisions and additions and cite the relevant decision or guidance document, including the summary of changes memorandum
- 2) explain the revisions and additions
- 3) conduct a revised project specific analysis using the revisions and additions in comparison to the original project

⁷ For example, the project sponsor may request a letter from the SFMTA to the Planning Department requesting releasing the sponsor from past, no longer applicable mitigation measure requirements.

- 4) explain whether the revised project (or proposed project change) would meet CEQA Guidelines criteria for additional environmental review

9. UNCERTAINTIES

The department acknowledges the dynamic nature of the transportation network and the variety of transportation modes that have emerged in recent years. The department consulted with other transportation agencies and expert transportation analysts to ensure the sufficiency, adequacy, and accuracy of the information, methodology, and data collection efforts used to develop this guidelines update. While future technological changes, socioeconomic forces, etc. may change travel demand estimates, the department relied on the best available information to inform the guidelines at the time of preparation.

Pursuant to CEQA Guidelines section 15144, preparation of environmental analysis involves some degree of forecasting. While foreseeing the unforeseeable is not possible, the department did for this update and will in its future make its best efforts to find out and disclose all that it reasonably can regarding uncertainties that may affect transportation analysis.

This may be qualitatively accomplished by describing the existing documentation and information available about a specific topic area (e.g. Transportation Network Companies, etc.) as it relates to a specific project. The department may request the transportation analysis to provide a summary of the key findings from recent literature or studies in the transportation analysis. Refer to Attachment F for an example. Pursuant to CEQA Guidelines section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.