



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: April 13, 2017
TO: San Francisco Planning Department Transportation Consultants
FROM: Wade Wietgreffe, Senior Planner
RE: Transportation and Circulation Significance Criteria – Clarity

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In September 2016, a memorandum was sent to the transportation consultant pool regarding language for transportation and circulation significance criteria. Although some of these significance criteria were in place for many years, the purpose of this memorandum is to provide clarity through further description, references, and examples of types of analysis necessary to address some significance criteria for typical development projects. Clarity is only provided for those significance criteria with recently observed misunderstandings. The significance criteria presented in the September 2016 memorandum are also broken apart into questions for clarity purposes. The description and examples are not intended to be exhaustive. This guidance should be paired with existing guidance provided in the Transportation Impact Analysis Guidelines and Environmental Review Guidelines.¹

In addition, this memorandum updates the approach for addressing the recently adopted Transportation Demand Management Program and provides clarity regarding the approach for using a future baseline and analyzing cumulative impacts.

VEHICLE MILES TRAVELED (VMT)

Would the project:

- Cause substantial additional VMT?
- Substantially induce additional 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?

The removal of automobile delay does not preclude the need for trip distribution information provided in the travel demand section of the transportation study. This information is still vital to analyze other transportation (and air quality and noise) impact topics.

VMT does not equal traffic. Traffic generally refers to vehicles moving (or not) on a street. VMT captures not just the amount of vehicles on a street in any given location, but also the distance those vehicles travel and the associated impacts from that. VMT and traffic must be separate transportation impact headings. The VMT heading captures these impacts. The traffic heading relates to traffic hazards, as described further below. Please refer to references below for further details regarding VMT analysis.

¹ Both documents are available online here: <http://sf-planning.org/consultant-sponsor-resources>. Both documents are intended to be updated in the future.

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Transportation Demand Management (TDM) Program

The TDM Program (Planning Code Section 169) became effective March 19, 2017. It generally applies to all residential development of 10 units or more, non-residential development of 10,000 square feet or more, and changes of use of 25,000 square feet or more. Each project subject to the TDM Program is required to meet a points target. The project sponsor meets the points target through the selection of measures from a TDM menu of options. The points target is adjusted downward for those projects that meet the requirements of Planning Code Section 169.3(e) related to filing date of applications. Note that the 'Environmental Application deemed complete' language in the Planning Code only applies for projects that meet that requirement on or before September 4, 2016, which those projects shall be subject to 50% of the points target.²

For new transportation studies or existing transportation studies at draft 2 or prior, the project description should describe the TDM measures selected for each proposed land use category that will require a TDM Plan and include plans displaying the physical TDM measures selected. In most instances, the VMT section discussion of TDM will simply consist of a code compliance discussion (i.e., documentation as to how the project's TDM Plan meets the points target).

The project sponsor is required to file their TDM Plan with the first Development Application. Given environmental review shall not proceed beyond review of the project description unless the project sponsor has filed Development Application(s), the transportation consultant will have access to the project sponsor's TDM Plan for this code compliance check. TDM checklists, improvement measures, etc. are typically no longer required for transportation review as this is now a Planning Code requirement. Please refer to references below for further details regarding the TDM Program.

References:

Refer to March 3, 2016 Planning Commission Staff Report for the Transportation Sustainability Program, Align Component for VMT significance criteria: <http://sf-planning.org/meeting/planning-commission-march-3-2016-agenda>

Shift (TDM Program) website: <http://sf-planning.org/shift-transportation-demand-management-tdm>.

² In other words, a Development Project with an Environmental Application deemed complete between September 5, 2016 and December 31, 2017 without a filed Development Application shall be subject to 100% of the target, while those with a filed Development Application between those dates shall be subject to 75% of the target.

TRANSIT

Would the project:

- cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service?

Screenline analysis is typically used to address this significance criterion. However, on a case-by-case basis directional link and/or line-by-line analysis may also be used.

Would the project:

- cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service levels could result?

Even if a project does not necessitate a *quantitative* transit delay analysis, this significance criterion still must be addressed *qualitatively*. This qualitative assessment should take into account whether the project would add a substantial volume of vehicle trips to lanes and movements with transit operations or whether the project would include design elements that would substantially affect transit operations (e.g., vehicular ingress/egress facilities where a substantial number of vehicles conflict with transit operations; or changes to the public right-of-way that affect transit facilities (e.g., relocation of transit stops)).

PEDESTRIANS

Would the project:

- result in substantial overcrowding on public sidewalks?

Even if a project does not necessitate a *quantitative* sidewalk capacity analysis, this significance criterion still must be addressed *qualitatively*. This qualitative assessment should take into account the existing plus project sidewalk activity, particularly as it relates to sidewalks between the project site entries/exits and major destinations or transit stops, and the actual and effective sidewalk widths.

Would the project:

- create potentially hazardous conditions for pedestrians?

This significance criterion focuses on hazards to people walking as a result of any element of the project. The analysis should focus on items such as whether the project would add a substantial volume of vehicle trips to a potentially hazardous turning movement for people walking; whether the project would exacerbate an existing hazard (e.g., High Injury Corridor) through a substantial number of vehicle trips; or whether the project would include design elements that would cause hazards (e.g., vehicular ingress/egress facilities where a substantial number of vehicles conflict with substantial number of people walking; vehicular ingress/egress facilities that result in hazardous turning movements between vehicles and a substantial number of people walking; or changes to the public right-of-way that create hazards for people walking). The analysis should also identify whether a substantial number of particularly vulnerable persons exist or would exist in the study area (e.g., children, seniors, people with disabilities).

Would the project:

- otherwise interfere with pedestrian accessibility to the site and adjoining areas?

This significance criterion focuses on accessibility both in terms of Americans with Disabilities Act (ADA) accessibility and accessibility in the broader meaning of the word. The analysis should focus on items such as whether ADA accessible sidewalks and facilities are provided, particularly as it relates to sidewalks between the project site entries/exits and major destinations or transit stops, and whether the project would create barriers to access to the site and adjoining areas (e.g., vehicular ingress/egress facilities that result in substantial queuing from vehicles that block access to a substantial number of people walking; creates substantially large blocks without mid-block pedestrian access facilities to provide safe access for people walking, particularly across streets with a diversity of land uses; or removal of sidewalk facilities).

BICYCLES

Bicycle capacity is not currently a significance criterion.

Would the project:

- create potentially hazardous conditions for bicyclists?

This significance criterion focuses on hazards to people bicycling as a result of any element of the project. The analysis should focus on items such as whether the project would add a substantial volume of vehicle trips to a potentially hazardous turning movement for people bicycling; whether the project would exacerbate an existing hazard (e.g., High Injury Corridor) through a substantial number of vehicle trips; or whether the project would include design elements that would cause hazards (e.g., vehicular ingress/egress facilities where a substantial number of vehicles conflict with substantial number of people bicycling; vehicular ingress/egress facilities that result in hazardous turning movements between vehicles and a substantial number of people bicycling; or changes to the public right-of-way that create hazards for people bicycling).

Would the project:

- otherwise substantially interfere with bicycle accessibility to the site and adjoining areas?

This significance criterion focuses on accessibility in the broader meaning of the word. The analysis should focus on items such as whether the project would create barriers to access to the site and adjoining areas (e.g., vehicular ingress/egress facilities that result in substantial queuing from vehicles that block access to a substantial number of people bicycling (e.g., across a bicycle facility); or removal of a bicycle facilities).

LOADING

Would the project:

- result in a loading 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** if it would create potentially hazardous ~~traffic~~ conditions affecting traffic, transit, bicycles, or pedestrians or significant delays affecting ~~traffic~~, transit, ~~bicycles or pedestrians~~.

This significance criterion includes two main questions, with a sub-question/comments beneath it:

- What is the peak hour loading demand?
- Can this peak hour loading be accommodated by the proposed off-street loading supply or within convenient on-street loading zones?
 - If yes, then significant impacts would not occur.
 - If no, does this situation create potentially hazardous conditions for traffic, transit, bicycles, or pedestrians or significant delays affecting transit?
 - If yes, then significant impacts would occur and mitigation measures are required.
 - If no, then significant impacts would not occur.

The significance criterion does not include Planning Code compliance, although Planning Code compliance should still be described. While non-compliance with the Planning Code may indicate that the project does not meet the peak hour loading demand, which by itself does not result in a significant impact. If the peak hour loading demand is not met, the analysis should focus on items such as whether the project would create potentially hazardous conditions for traffic, transit, bicycles, or pedestrians (e.g., double-parking on a high-volume street for any of those users of the transportation system) or significant delays affecting transit (e.g., double-parking in a mixed-flow lane used by transit or transit-only lane or illegal loading in a transit bus stop). If a project is not in compliance with the Planning Code, staff may require a code compliant variant to be studied to assess the environmental impacts of such a variant and inform decision makers.

While the current Transportation Impact Analysis Guidelines does not include estimates of passenger loading demand for most land uses, the impact analysis should still qualitatively assess the potential for impacts related to passenger loading following the same guidance as above.

TRAFFIC

Would the project:

- A project would have a significant adverse impact if it would cause major traffic hazards.

This significance criterion focuses on hazards to people driving as a result of any element of the project. The analysis should focus on items such as or whether the project would include design elements that would cause hazards (e.g., vehicular ingress/egress facilities where a substantial number of vehicles conflict with substantial number of people driving; vehicular ingress/egress facilities that result in hazardous turning movements between vehicles and a substantial number of people driving; or changes to the public right-of-way that create hazards for people driving).

EMERGENCY VEHICLE ACCESS

Would the project:

- A project would have a significant effect on the environment if it would result in inadequate emergency access.

CONSTRUCTION

Would the project:

- Construction of the project would have a significant effect on the environment if, in consideration of the project site location and other relevant project characteristics, the temporary construction activities' duration and magnitude would result in substantial interference with pedestrian, bicycle, or vehicle circulation and accessibility to adjoining areas thereby resulting in potentially hazardous conditions.

PARKING

Would the project:

- The project would have a significant effect on the environment if it would result in a substantial parking deficit that could create hazardous conditions affecting traffic, transit, bicycles, or pedestrians or significant delays affecting ~~traffic, transit, bicycles or pedestrians~~ and where particular characteristics of the project or its site demonstrably render use of other modes infeasible.

This significance criterion must be addressed, even if the project meets the provisions of Senate Bill 743. First, the analysis needs to determine if the project would result in a substantial parking deficit. This determination is rare (e.g., the project site is geographically isolated from transit and parking could not be managed or people would not be inclined to switch modes). If a substantial parking deficit would not occur, no significant impacts would occur. If the project would result in a substantial parking deficit, then the analysis would determine if the project would create potentially hazardous conditions for traffic, transit, bicycles, or pedestrians or significant delays affecting transit. Please refer to references below for further details regarding parking analysis.

References:

Refer to February 23, 2017 Planning Commission Memorandum for California Environmental Quality Act: Vehicle Miles Traveled, Parking, For-Hire Vehicles, and Alternatives: <http://sf-planning.org/meeting/planning-commission-march-2-2017-supporting-documents>.

FUTURE BASELINE

In some circumstances, it may be appropriate analyze a future (aka adjusted or modified) baseline. The rationale for a future baseline is the existing plus project impact analysis does not accurately reflect the conditions that exist at the time the project's impacts would occur and an existing plus project analysis could be misleading to the public and decision makers. In these circumstances, a description of existing conditions is still required in the transportation study. The future baseline conditions section shall describe the projects that

are assumed in the future baseline conditions and how the future baseline conditions will be different than existing conditions. Future baseline conditions projects shall only include those that are approved and funded at the time transportation analysis commences. In other words, the future baseline conditions shall only include projects that are certain (i.e., not planned, proposed, or unfunded) to be complete by the future baseline.

An example of a circumstance where it may be appropriate to analyze a future baseline is where a proposed project needs to be designed to accommodate implementation of major projects currently under construction (e.g., Central Subway, Transbay Transit Center, Van Ness Bus Rapid Transit).

CUMULATIVE

Much of this text is derived from the Environmental Review Guidelines, but modified slightly to reflect transportation. The analysis of cumulative impacts shall include the following:

- Definition of the relevant area affected for the specific impact category, with a reasonable explanation supporting the geographic area used in the analysis (e.g., transit capacity utilization may be screenlines; transit delay may be a specific transit line's operations; sidewalk capacity may be the sidewalks between the project site and transit stops or major destinations; hazards may be along the project's major vehicular travel streets and vehicular ingress/egress points; loading may be the streets anticipated for where the project's loading activities would occur).
- If using the list approach, identification of past, present, and probable future projects that might result in related impacts (e.g., two projects may result in loading demand on the same street).
- If using the projections approach, identification of past, present, and probable future projects that are included in the projections and that might result in related impacts (e.g., transit capacity utilization may include population growth projections for the City or region; transit delay may include population growth projections that would delay a specific transit line through increased vehicles and passengers);
- Identification of whether there is a significant impact to which both the proposed project and other projects contribute. This analysis shall also discuss whether the project designs for the public right-of-way would conflict with a reasonably foreseeable streetscape design project. This shall be done without taking into account any mitigation identified for project-specific impacts.
- If there is a significant cumulative impact, identification of whether the proposed project's incremental effect is cumulatively considerable without mitigation.
- If the project contributes to a significant cumulative impact and if the project's contribution is cumulatively considerable, identification of whether mitigation would reduce the project's contribution to a less than cumulatively considerable level.
- Statement of whether the significance of the project's contribution to the cumulative impact is: 1) less than significant (i.e., less than cumulatively

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considerable); or 2) less than significant with mitigation (i.e., the cumulatively considerable contribution would be eliminated or rendered so small that it is no longer cumulatively considerable with mitigation).

Note it is not acceptable to state that a significant cumulative impact would not occur because the proposed project would have a less-than-significant impact.

If you have questions, please contact your Wade.Wietgreffe@sfgov.org or Manoj.Madhavan@sfgov.org.