



## Summary of Changes Memorandum

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*To:* Record No. 2015-012094GEN  
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*RE:* **Transportation Impact Analysis Guidelines Update, Summary of Changes**

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### 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 periodically updates the guidelines, with the last update in 2002. The department is currently updating the guidelines.

The guidelines are just that, a document to provide guidance to city staff and consultants on how to undertake environmental review. The Planning Commission does not formally adopt the guidelines. The guidelines provide basic details regarding methodologies and standards, but individual transportation study scopes of work are required to provide a level of detail tailored to fit the size and complexity of transportation issues associated with particular 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.

This memorandum summarizes the transportation and circulation significance criteria and thresholds of significance (i.e., what we use to determine whether a project results in a significant impact or not)<sup>1,2,3</sup> that the department has used to date, and how those criteria and thresholds will change with this update. The memorandum also describes major changes to methodology made during this update to the guidelines.

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<sup>1</sup> The 2002 guidelines did not list significance criteria or thresholds of significance. The department has used the environmental checklist form set forth in Appendix G of the CEQA Guidelines. To answer Appendix G transportation checklist questions, the department used significance criteria and thresholds of significance, but the department used discretion on applying these on a project by project basis. The descriptions included herein reflect the approach the department has used to address the significance criteria and thresholds of significance for multiple projects, between 2002 and February 2016.

<sup>2</sup> CEQA Guidelines section 15064.7 defines threshold of significance, but CEQA does not define significance criterion(a). For the purposes of this memorandum, the former refers to quantitative thresholds of significance and the latter refers to factors or metrics to consider for determining significance.

<sup>3</sup> The summary herein assumes a typical land use development project or infrastructure project, but not other types of projects (e.g., area plans). Refer to other specific memoranda for more details regarding those other types of projects.

## THE WAY IT WAS

The 2002 guidelines updated and revised the Guidelines for Environmental Review: Transportation Impacts (July, 1991) and Interim Transportation Impact Analysis Guidelines for Environmental Review (January 2000). The 2002 guidelines did not list significance criteria or quantitative thresholds of significance. The department used the environmental checklist form set forth in Appendix G of the CEQA Guidelines. To answer Appendix G transportation checklist questions, the department used significance criteria and quantitative thresholds of significance, but the department used discretion on applying these on a project by project basis. The 2002 guidelines or subsequent guidance from the department between 2002 and 2016 cover the following topics (in the order and title the department presents the topics in the guidelines update):

### Transportation Review Process

The department listed seven conditions for which the department may typically require a transportation study, with three conditions related to automobile delay, one condition each related to parking, transit, pedestrian and bicycles, and truck loading. The department also described the typical review process, including planner assignment, scoping, and analysis process, including the post scoping involvement of city departments such as Municipal Railway and Department of Parking and Traffic.

For more detail, refer to pages 1 through 5 and Appendix A in the 2002 guidelines.

### Travel demand

To assess impacts, the department estimated how many trips people in proposed development projects may take, the ways they would travel, and their common destinations based on a series of sources. Among these sources, the department 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.

For more detail, refer to pages 9 and 10 and appendices C, D, and E in the 2002 guidelines.

### Walking/Accessibility

To answer Appendix G transportation checklist questions, the department used the following significance criteria: Would the project:

1. result in substantial overcrowding on public sidewalks? or
2. create potentially hazardous conditions for pedestrians? or
3. otherwise interfere with pedestrian accessibility to the site and adjoining areas?

The department did not use quantitative thresholds of significance, except in some circumstances surrounding overcrowding.

For methodology, refer to page 14 in the 2002 guidelines.

**Bicycling**

To answer Appendix G transportation checklist questions, the department used the following significance criteria: Would the project:

1. create potentially hazardous conditions for bicyclists? or
2. otherwise interfere with bicycle accessibility to the site and adjoining areas?

The department did not use quantitative thresholds of significance.

For methodology, refer to pages 14 and 15 in the 2002 guidelines.

**Public Transit**

To answer Appendix G transportation checklist questions, the department used the following significance criteria and associated quantitative thresholds of significance: Would the project:

1. criterion: create a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service? or  
associated quantitative threshold of significance: project-related transit trips would cause the capacity utilization standard to be exceeded during the peak hour (generally 85% for Muni and 100% for regional providers).
2. criterion: cause a substantial increase in delays or operating costs such that significance adverse impacts in transit service levels could result?  
associated quantitative threshold of significance: project-related trips (transit and vehicle) would increase transit travel time on a route so that additional transit vehicles would be required to maintain the existing headways (aka frequency) between transit vehicles which is typically an increased travel time greater than half of the existing route headway.

For methodology, refer to pages 11 and 12 and appendix F in the 2002 guidelines.

**Emergency Access**

To answer Appendix G transportation checklist questions, the department used the following significance criterion: Would the project result in inadequate emergency access? The department did not use a quantitative threshold of significance.

For methodology, the 2002 guidelines do not include emergency access impacts. In subsequent guidance, the department did not specify the locations at which inadequate emergency access could occur.

**Loading**

To answer Appendix G transportation checklist questions, the department used the following significance criterion:

1. 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  
created potentially hazardous conditions or  
significant delays affecting traffic, transit, bicycles or pedestrians?

The department did not use a quantitative threshold of significance.

For methodology, refer to pages 15 and 16 and appendix H in the 2002 guidelines. The methodology did not define convenient and quantified commercial loading demand for freight and delivery service for a variety of land uses and passenger loading demand for hotel uses only.

### **Vehicle Miles Traveled/Induced Automobile Travel**

Prior to March 2016, the department did not analyze vehicle miles traveled or induced automobile travel.

### **Driving Hazards (also Automobile Delay/Traffic)**

The 2002 guidelines did not identify driving hazards as a separate topic, although the 2002 guidelines included vehicular driveway access impacts as part of the parking topic (see below). To answer Appendix G transportation checklist questions, the department used the following significance criteria and associated quantitative thresholds of significance: Would the project:

1. criterion: cause major traffic hazards? or
  - a. associated quantitative threshold of significance: none.
2. criteria: cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (until February 2010) or conflict with an applicable congestion management program related to level of service (LOS) standards?
  - a. associated quantitative thresholds of significance:
    - i. change level of service at an individual intersection from anywhere between LOS A and D to LOS E or F; or
    - ii. change LOS at an individual intersection from LOS E to F; or
    - iii. contribute considerably to an intersection that is currently or predicted to operate at LOS E or F (generally considered a five percent contribution to a critical movement or worst approach).<sup>4</sup>

As it relates to automobile delay methodology, refer to pages 10 and 11 and appendix B in the 2002 guidelines (“traffic”).

### **Construction**

The department generally did not consider construction-related impacts as significant due their temporary and limited duration, although the department did consider the constructions duration and magnitude in relation to secondary construction impacts. The department did not use a quantitative threshold of significance.

For methodology, refer to page 16 in the 2002 guidelines.

### **Vehicular Parking**

To answer Appendix G transportation checklist questions, until 2009, the department used the following significance criterion: Would the project result in inadequate parking capacity? Throughout, the department also considered whether the project would result in secondary impacts from an unmet parking demand?

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<sup>4</sup> For more information on history of automobile delay analysis in San Francisco, refer to San Francisco Planning Department, “Executive Summary, Resolution Modifying Transportation Impact Analysis”, March 3, 2016.

While Appendix G transportation checklist questions included inadequate parking capacity up until 2009, the department for many years 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 (e.g., safety, air quality, noise) could be an environmental impact. This approach was affirmed in a published court decision, *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4<sup>th</sup> 656.<sup>5</sup>

In response in part to the *San Franciscans* published court decision, 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.

The department did not use a quantitative threshold of significance for inadequate parking capacity or secondary effects.

For methodology, refer to pages 12 and 13 and appendix G in the 2002 guidelines. The methodology generally speaking, estimated parking “demand” for a development assuming a free, unconstrained supply of parking at the development. The department did not account for variables that may influence parking such as the price or parking supply proposed for the development or the parking supply that already exists in the surrounding neighborhood.<sup>6</sup>

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<sup>5</sup> Two other court cases are relevant here: In *Taxpayers for Accountable School Bond Spending v. San Diego Unified School District* (2013) 215 Cal.App.4<sup>th</sup> 1013, the court distinguished *San Franciscans*, holding that the circumstances within that case were special, given its urban context and adopted city policies, and may not apply elsewhere. Furthermore, the court found that in the San Diego case, the lack of parking could potentially lead to environmental impacts, given the specific circumstances of that case, in which narrow, curvy streets in the vicinity of a school sports facility created potentially hazardous conditions. The Taxpayers’ case findings also reflected the circumstances of the case: a “fair argument” test was applied given a mitigated negative declaration had been prepared for the project in question as opposed to the “substantial evidence” test for environmental impact reports; which the latter is more deferential to the lead agency. In *Covina Residents for Responsible Development v. City of Covina* (2018) 230 Cal.Rptr.3d 550, the court quoted *San Franciscans* and confirmed that projects that meet the criteria in California Senate Bill 743 only need to address secondary parking impacts.

<sup>6</sup> An exception is the extent those variables influenced travel behavior at the time people took the survey and then the department used those survey results to inform parking demand.

## THE WAY IT IS NOW

Since 2002, San Francisco has undertaken a substantial amount of transportation planning and policy work. For example, the San Francisco Municipal Transportation Agency was only three months old when the department last updated the guidelines; now the SFMTA includes a planning division. Over these years, interagency coordination to address issues has also improved. This includes agencies coordinating on transportation ordinances; developing land use and transportation area plans together; creating an inter-agency team that reviews projects compliance with the better streets plan; and embarking on a long-range transportation vision for San Francisco. Some of these planning and policies changes have affected the CEQA transportation review process. For example, our analysis has placed greater emphasis on safety, in reaction to San Francisco's Vision Zero commitments. On the other hand, the work of these agencies and some of these policies result in fewer projects with significant transportation impacts and sometimes avoid them altogether.

The department is focusing this guidelines update on addressing CEQA transportation topics. This section summarizes the new transportation and circulation significance criteria and quantitative thresholds of significance (with ~~striketrough~~ and underline, if different than pre-February 2016)<sup>7</sup> and major changes to methodology made to pre-February 2016 department guidance.

### Transportation Review Process

[forthcoming]

### Travel Demand

[forthcoming]

### Walking/Accessibility

To answer Appendix G transportation checklist questions, the department uses the following significance criteria: Would the project:

1. ~~result in substantial overcrowding on public sidewalks? or~~
1. create potentially hazardous conditions for ~~pedestrians~~ people walking<sup>8</sup>? or
2. ~~otherwise~~ interfere with ~~pedestrian~~ accessibility of people walking to and from the project site and adjoining areas?

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:

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<sup>7</sup> Refer to footnote 1.

<sup>8</sup> This topic addresses impacts to people walking, including people with disabilities that may or may not require personal assistive mobility devices. In addition, people walking may refer to people participating in recreational or social activities in the public right-of-way.

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.

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 hazard, 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).

The department does not use a quantitative threshold of significance, but does provide a non-exhaustive list of circumstances under which significant impacts could occur.

The new methodology is similar to but with more description than the past guidelines.

### **Bicycling**

To answer Appendix G transportation checklist questions, the department uses the following significance criteria: Would the project:

1. create potentially hazardous conditions for ~~bicyclists~~ people bicycling? or
2. ~~otherwise~~ interfere with ~~bicycle~~ accessibility of people bicycling to and from the project site and adjoining areas?

The department does not use a quantitative threshold of significance, but does provide a non-exhaustive list of circumstances under which significant impacts could occur.

The new methodology is similar to but with more description than the past guidelines. The new methodology also differentiates between CEQA review and informational analysis (e.g., bicycle parking, showers, on-site bicycle circulation).

### **Public Transit**

[forthcoming]

**Emergency Access**

To answer Appendix G transportation checklist questions, the department uses the following significance criterion: Would the project result in inadequate emergency access?

The department does not use a quantitative threshold of significance, but does provide a non-exhaustive list of circumstances under which significant impacts could occur.

The new methodology identifies the geographic area in which inadequate emergency access could occur. The geographic area will include the project site or surrounding area and emergency operator facilities within the study area. The new methodology also differentiates between CEQA review and informational analysis (e.g., internal site access).

**Loading**

[forthcoming]

**Driving Hazards**

To answer Appendix G transportation checklist questions, the department uses the following significance criterion: Would the project:

1. ~~cause~~ create potentially major traffic hazardous conditions for people driving? ~~or~~
  - a. associated quantitative threshold of significance: none, but the department does provide a non-exhaustive list of circumstances under which significant impacts could occur.
2. ~~criteria: cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (until February 2010) or conflict with an applicable congestion management program related to level of service (LOS) standards?~~
  - a. ~~associated quantitative thresholds of significance:~~
    - i. ~~change level of service at an individual intersection from anywhere between LOS A and D to LOS E or F; or~~
    - ii. ~~change LOS at an individual intersection from LOS E to F; or~~
    - iii. ~~contribute considerably to an intersection that is currently or predicted to operate at LOS E or F (generally considered a five percent contribution to a critical movement or worst approach).~~

As it relates to automobile delay, 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 Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.<sup>9</sup>

Consistent with this resolution, the new guidelines do not include automobile delay. As it relates to potentially hazardous conditions to people driving, the new methodology is similar to but with more description than the past guidelines.

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<sup>9</sup> Refer to footnote 4.



**Vehicle Miles Traveled/Induced Automobile Travel**

[forthcoming, but refer to San Francisco Planning Department, “Executive Summary, Resolution Modifying Transportation Impact Analysis”, March 3, 2016]

**Construction**

[forthcoming]

**Vehicular Parking**

[forthcoming]

**Other Situations**

[forthcoming]