

# Modifying Impact Analysis

## CEQA REFORM FOR TRANSPORTATION IMPACTS

### PROJECT DESCRIPTION

The City of Oakland is updating its environmental review guidance in response to changes in state CEQA requirements and recommendations from the Governor's Office of Planning and Research (OPR).

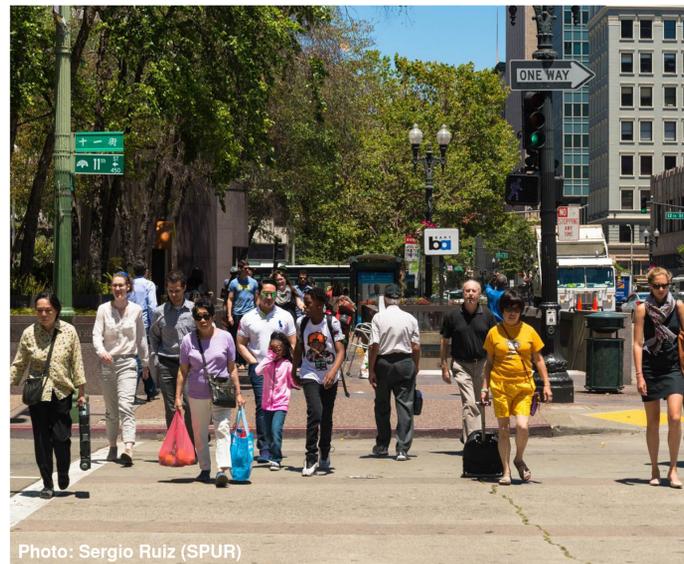


Photo: Sergio Ruiz (SPUR)

### WHAT'S CHANGING?

Reflecting OPR's guidance, Oakland will update its CEQA Guidelines to replace level of service with vehicle miles traveled per supply when evaluating environmental impacts related to transportation. The following project impact questions reflect OPR's proposed CEQA guidance:

**The project would have a significant impact on the environment if it would:**

1. Conflict with a plan, ordinance, or policy addressing the safety or performance of the circulation system, including transit, roadways, bicycle lanes, and pedestrian paths (except for automobile level of service or other measures of vehicle delay); or
2. Cause substantial additional vehicle miles traveled per capita or per worker; or
3. Substantially induce additional automobile travel by increasing physical roadway capacity in congested areas or by adding new roadways to the network?

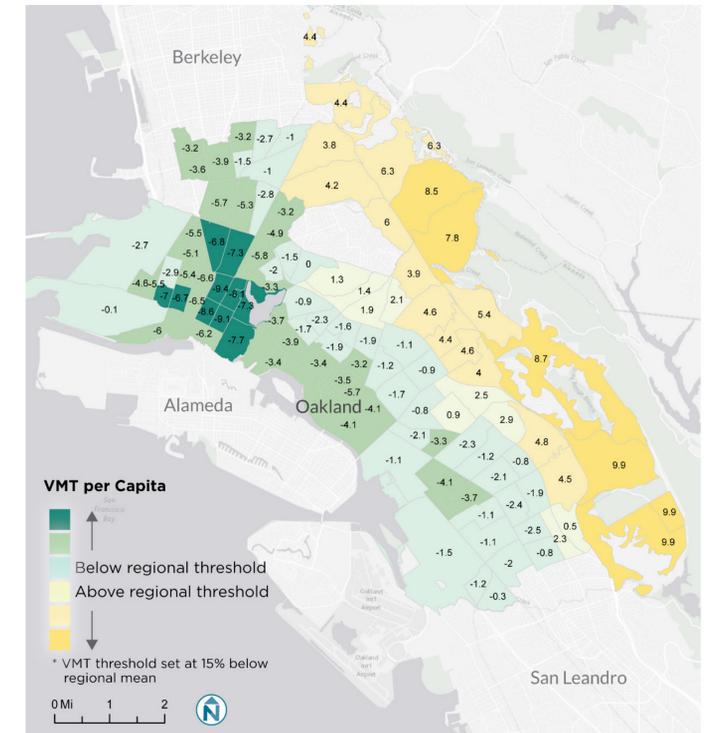
### HOW VEHICLE MILES TRAVELED WILL BE ANALYZED?

Oakland will assess VMT impacts using a location-based VMT approach recommended by OPR. A model developed for regional climate action planning and maintained by the Metropolitan Transportation Commission (MTC) will provide the analytic tool for impact assessment.

This model draws on a number of geographic data to identify per capita VMT within each Transportation Analysis Zone (TAZ) for residents and employees.

Therefore, for CEQA analysis purposes, a project's transportation impact will be analyzed as a function of the current and cumulative VMT of the TAZ(s) where the project is located.

**Figure:** VMT per resident by traffic analysis zone (TAZ). Green TAZs are 15% below the regional average, and yellow are 15% above the regional average.



### BACKGROUND

**2013**

Governor Brown signs Senate Bill 743 into law, which directs the Governor's Office of Planning & Research (OPR) to identify a replacement for auto delay in environmental impact analysis.

**2014**

OPR issues discussion draft that proposes vehicle miles traveled as replacement metric.

Lead CEQA agencies comment on discussion draft, including the City of Oakland.

**2015**

OPR issues draft proposal for changes to CEQA Guidelines

San Francisco updates local CEQA Guidelines to reflect OPR's proposal.

Oakland drafts proposal to update local CEQA Guidelines, reflecting OPR.

**2016**

### WHAT'S WRONG WITH LOS?

Level of Service (LOS) is a measure of automobile delay. OPR has identified several issues with using LOS to perform environmental impact analysis:

1. It is difficult and expensive to calculate
2. It is biased against "last in" development
3. The scale of analysis is too small
4. LOS mitigation is itself problematic
5. LOS mischaracterizes transit, bicycle, and pedestrian improvements as detrimental to transportation.
6. Use of LOS implies false precision
7. LOS measures motorist convenience but not physical impact to the environment.

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