

**Traffic Threshold – Stakeholders Discussion
Staff Response to February 28, 2014 Memo**

1. ***CEQA format. As discussed in our meeting, it was not clear how the new thresholds would be incorporated into future CEQA documents with respect to evaluating project-specific impacts using a future General Plan Build-out baseline. Would the document contain an Existing + Project section as well as a Build-out + Project analysis to evaluate project specific impacts? The group felt that it would be helpful to include an existing + project analysis in the environmental documents to ensure compliance with CEQA.***

Response: In general, the analysis of project-specific traffic impacts within CEQA documents will consist of trip generation calculations and distribution determinations (based on the City traffic model) applied against the new threshold: *a significant project-specific traffic impact results if a project's net peak-hour traffic generation would constitute 1% or more of intersection capacity at one or more of the 26 identified intersections.* Exceptions to this general rule would occur on a case-by-case basis when the city receives substantial evidence of a potential impact at an intersection that is not one of the 26 identified intersections.

This threshold and analysis of project-specific impacts does not compare project traffic generation against either an existing traffic conditions baseline or a future traffic conditions baseline. It is a metric for determining a significant project-specific impact that is different from past methods.

The development of the new project-specific impact threshold was informed by the General Plan Program EIR analysis of citywide traffic impacts, which considered both existing conditions and estimated build-out to the year 2030 under the General Plan. The analysis included development of a customized City traffic model that uses more accurate local trip generation rates than the traditional ITE national rates. The new threshold would be applied to the list of intersections either already impacted under existing conditions or expected to become impacted by the year 2030 with anticipated future growth.

The adopted policies in the General Plan and implementing Growth Management Ordinance and Traffic Management Strategy provide the basis for the new impact significance threshold by establishing that a significant project-specific traffic impact occurs when a project's traffic generation would use a substantial share of limited remaining intersection capacity. The new threshold defines that to be 1% of intersection capacity at any of the identified 26 intersections already impacted or expected to become impacted by the year 2030.

The State CEQA Guidelines support this type of approach to the traffic evaluation process. The Guidelines recommend using program EIR analysis to support policy development and mitigation programs, and to streamline subsequent CEQA review for individual projects. The Guidelines also identify significant impacts in terms of inconsistency with a policy or plan adopted for the purpose of mitigating environmental impacts. The California Resources Agency and Governor's Office of Planning & Research revised the CEQA Guidelines traffic impact question in the Appendix G Environmental Checklist (*formerly a substantial increase in traffic compared to existing traffic load and street capacity*). Since 2009, the new Guidelines question reflects a programmatic approach that considers entire circulation system management (*whether the project would conflict with an applicable plan or policy establishing measures of effectiveness for performance of the circulation system*).

The City Growth Management Ordinance and Traffic Management Strategy establish measures of effectiveness in the context of growth and traffic policies designed to manage the overall City circulation system and mitigate significant traffic effects. City policies retain the measure of Level of Service C (below .77 volume-to-capacity ratio) as the acceptable traffic level goal within the City. When a project would utilize 1% or more of intersection capacity at intersections with existing or projected peak-hour traffic levels above this LOS, a significant project-specific traffic effect is identified. A citywide traffic management approach is provided through limiting allowable types of new development with project-specific significant traffic impacts, and applying other mitigation measures such as road improvements, alternative transportation measures, or project land use or size changes.

SB 743 now in effect requires additional changes to how transportation effects are to be evaluated under CEQA. The bill directs the Resources Agency and OPR to establish Guidelines amendments that change the focus of traffic and parking impacts away from vehicle driver delay. The transportation metric for CEQA impact evaluation is expected to be changed from intersection level of service to an alternate measure such as trip generation. However, the City traffic analysis is a policy matter as well as CEQA matter, and is tied into the General Plan growth management and traffic management strategy. It is anticipated that the City would continue to do this traffic analysis for policy consistency even if it is not required as part of CEQA analysis.

2. ***Other Intersections. One of the items we discussed was the analysis of other intersections that were not reviewed in the City's General Plan EIR. It was anticipated that there could be questions and concerns from neighbors that local intersections were not included in a project-level impact analysis, and that this could result in a challenge to the certification of an environmental document. Would there be procedure be for analyzing other locations not included in the General Plan analysis? Or is the City taking a wait and see approach?***

Response: The City programmatic approach is based on the General Plan EIR cumulative analysis. The intersections counted for this analysis provided a representative sample of traffic conditions throughout the City as a basis for the traffic modeling. The traffic model analysis identified intersections anticipated to become impacted by 2030 with the forecasted level of growth. These are the intersections of concern with respect to overall functioning of the City circulation system in accordance with traffic policies. Project-specific traffic effects under CEQA are identified with respect to these intersections, and the Growth Management policies identify permitted types of development based on traffic impacts to these intersections.

This programmatic approach would be explained in response to neighbor concerns. While a project might contribute some traffic to another intersection, this would generally not constitute a significant impact under CEQA and would not need further analysis. In instances where a project has potential for a project-specific impact to one of the identified intersections, a model run will be done, and further information pertaining to other intersections could be made available. The City model and baseline conditions will be monitored and periodically updated as discussed in Item 3 below. If information becomes known through City traffic counts or submittal from an interested party that indicates a substantial change in an intersection traffic level beyond the 26 identified intersections, the standard analysis for environmental review could be augmented.

3. Monitoring and Update Procedure. The group would like to know how the City will monitor the performance of the intersections identified in the thresholds over time and how often the General Plan assessment would be updated. For example, will intersection performance only be reviewed when sufficient fees have been collected to update the model?

Response: Following the 2008 citywide traffic counts, traffic levels have dipped during the economic downturn. The amount of net new development generating more traffic has also been very low since that time. Traffic levels are gradually increasing. It is estimated that about 1.25% traffic growth due to land development would represent a substantial change to traffic levels. When this amount of traffic growth occurs, re-calibrating the traffic model will yield a more accurate future baseline. The Traffic Model Data Collection fee, established in July 2013 will accumulate in direct relationship to the amount of new traffic generated by land developments. The accumulation of fees equaling the amount of funding needed for a citywide traffic evaluation would occur at the point approximately 1.25% of traffic growth occurs. At that time, new citywide traffic counts will be conducted and the traffic model re-calibrated. This will establish an updated future traffic baseline, and the traffic model will be recalibrated and, as needed, the list of 26 intersections updated.

Year to year, some traffic information is collected. The Transportation Division conducts traffic counts at various locations to update traffic levels at intersections that appear to be changing, or as input to Santa Barbara County Association of Governments (SBCAG) regional transportation and congestion management planning. Model runs using the City model will be done as needed for individual project proposals or City projects. Other material changes to the transportation system or land use patterns could justify a recalibration of the model (e.g., completion of the 101 HOV project, City adoption of parking pricing or other transportation mitigation measures, etc.) The Planning Division also continues tracking land use development as part of the General Plan Growth Management and Adaptive Management Programs.

4. Un-signalized Intersections. The new thresholds do not address un-signalized intersections. How will the City approach the impact analysis?

Response: The proposed traffic threshold addresses both signalized and non-signalized intersections, and both types of intersections are on the threshold list of intersections. Both types of intersections are measured the same way: an impact will occur if project traffic uses 1% of the total intersection capacity. Traffic contributions to non-signalized intersections that are not identified on the list of intersections would not constitute a significant environmental impact under CEQA because those intersections are not anticipated to be significantly impacted now or in the future.

The regulatory process in place for determining signal warrants would continue to be used as applicable. Under that process, some projects in close proximity to a non-signalized intersection will be required to provide site-specific traffic analysis and engineering, and, in some cases, roadway improvements. In some cases, this could result in a requirement to signalize an un-signalized intersection.

5. Mitigation Measures. The new thresholds do not discuss mitigation measures that could be considered for the identified locations. Are there any anticipated?

Response: The new threshold provides criterion defining a significant project-specific impact for CEQA environmental review purposes. If significant traffic impacts are anticipated, under CEQA and City policy, mitigation measures need to be proposed to reduce traffic impacts. These may range from physical roadway improvements to contributions to traffic mitigation funding to use of alternative transportation strategies to project land use or size changes.

As a largely built out city, there are not always roadway improvements available as mitigation. The General Plan Program EIR (*Volume 1, Section 16, Transportation Impact T-1*) identified roadway improvement mitigations, including full mitigation for some intersections, and strategies for partial mitigation of numerous other intersections.

In the General Plan Circulation Element, Policy C6-Circulation Improvements also directs that roadway improvements and other measures such as transportation demand management (TDM) should be done when congestion occurs. Implementation Action C6.1 directs installation of traffic signals or roundabouts at specified intersections. Implementation Action C6.2 directs development of a program identifying feasible improvements and funding sources for problem intersections. The Transportation Division will be developing this General Plan intersection improvement/traffic mitigation program during the next fiscal year.

Additional Circulation Element programs that provide mitigation approaches for traffic congestion include:

- C1.1 – Pedestrian and Bicycle Infrastructure
- C1.2 – Personal Transportation (e.g., car share)
- C1.3 - Intermodal Connections
- C1.4 – Optimize Capacity (ITS strategies)
- C1.5 – Mid Block Traffic Flow Improvements
- C2.1 – Regional Transportation Networks
- C2.3 – Improved Transit Frequency
- C6.3 – Transit Pass Program
- C6.4 – Cash-Out Parking
- C6.5 – Downtown Parking Pricing
- C6.7 – Carpooling and Telecommuting
- C7 – Parking Management implementation programs

6. Definition of V/C Ratio Change. Please define how the V/C ratio increases will be determined in the thresholds (rounding issue).

Response: The proposed project-specific traffic threshold is measured using the project traffic distributed to an intersection. If the project uses 1% or more of capacity of that intersection, an impact is expected to occur. Analysis that shows project traffic using less than 1% will not be rounded to 1%. Importantly, no measurement of existing traffic volumes is needed and only project traffic is distributed to make a determination. In other words, the analysis of project related traffic distributed to the subject intersection is not added to any other traffic

7. Traffic Credits. Please clarify how traffic credits will work from a CEQA perspective. How long do traffic credits live for properties that are vacant for the proposed project-specific thresholds?

Response: Trip credits would continue to be applied. Environmental impacts of projects are considered as net changes.

- *Existing Uses.* Current traffic generated on a project site constitutes trip credits that are subtracted from traffic generation of the proposed project to identify the net traffic change. Existing buildings (occupied or not) are assumed to generate an average Santa Barbara trip rate for that use.
- *Past Uses.* Trip credits would generally be applied for past uses on the site in place during the citywide baseline traffic counts (2008) until the next citywide traffic counts and model run update. Once the new traffic counts are performed, a demolished building is no longer accounted for in the traffic analysis.
- *Approved but Unbuilt Uses/ Revised Project.* Per CEQA Guidelines 15162-15164, tiering/ staging provisions, and case law, CEQA review of a subsequent discretionary permit for some revised projects is limited to net additional impacts not previously evaluated in CEQA review of original project. Prior project impact is essentially a trip credit. This only applies with a prior EIR or ND (cannot “tier” off an Exemption). There are some case law differences for providing credits on new projects vs. revised projects.

8. Updated Land Use Scenario. Does the City anticipate updating the General Plan Build-out traffic analysis to reflect the scenario that was approved by the City? It seems that this scenario should be the basis for the intersection list in the new thresholds rather than the No-Project Alternative.

Response:

The final adopted build-out scenario will be included in the first traffic model re-calibration, expected to occur in the next 2-4 years. At that time, staff anticipates that the number of impacted intersections will change as a result of the more accurate projection, because some of the 26 intersections have been improved, and/or because some external event has changed/increased/decreased traffic volumes and/or patterns.