OCTA’S Proactive Approach to SB743 Implementation

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Background/History of SB743

- Legislation was signed on September 27, 2013
- To date, there have been three official releases from OPR (and one unofficial document):
  - December 30, 2013 – Preliminary Evaluation of Alternative Methods of Transportation Analysis
  - August 8, 2014 – Updating Transportation Impacts Analysis in CEQA Guidelines
  - July 24, 2015 – Technical Advisory on Evaluating Vehicle Miles Traveled in CEQA (staff-level discussion draft)
  - January 20, 2016 – Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA
- Caltrans has also weighed in with an interim guidance document:
  - September 2, 2016 – Local Development – Intergovernmental Review Program Interim Guidance
SB743 in Infographics

LOS

VMT

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Major Questions and Outstanding Issues: Development

- What is the appropriate region for the “regional average”?
- Is 15 percent under the regional average as the threshold for residential and office projects the correct amount (and is it defensible)?
- How should VMT/capita and VMT/employee be calculated?
- Is net change in regional VMT the most appropriate assessment for retail projects?
- Should small projects be screened out; if so, what is the appropriate threshold?
- Is the presumption that residential, retail, office, and mixed-use projects within ¼ mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT appropriate? And what happens if transit service changes?
Major Questions and Outstanding Issues: Transportation

- Are transportation projects that add capacity (e.g., addition of through lanes on existing or new highways) the only projects that would likely lead to an increase in VMT?
- Would non-capacity increasing projects (e.g., road diets, coordinated signals, conversion to managed lanes, new transit service) really not result in a substantial or measureable increase in VMT? Where is the evidence?
- Is induced demand the correct means to estimate the VMT changes of a transportation project?
- How do changes to land use plans/policy get accounted for?
OPR’s Qualifier Language

- “Lead agencies have discretion to choose the most appropriate methodology to evaluate project impacts.”
- “Lead agencies may develop their own more specific thresholds.”
- OPR will be providing:
  - “technical considerations”
  - “technical recommendations”
  - “suggestions”
Concerns with SB743 Implementation

- Different definitions of regional averages
  - SCAG
  - Orange County
  - Sub-regions
- Inconsistent approach to calculating model-based VMT
  - Assumptions for trip purpose
  - Estimates of distance for out-of-county trips
- Application of off-model (sketch) tools without proper validation
- Deviation from OPR recommendations

- May result in legal challenges
Development of Modeling Approach

- SCAG Region vs. Orange County
Development of Modeling Approach

- **OCTA Model (OCTAM)**
  - VMT/capita = (VMT of HBW + HBO + HBSC + HBU production trip)/population
  - VMT/employee = (VMT of HBW attraction trip + VMT of WBO production trip)/employee

- **SCAG Model**
  - VMT/capita = (VMT of HBW + HBNW + HBSC production trip)/population
  - VMT/employee = (VMT of HBW attraction trip + 0.5 * (VMT of NHB production trip + VMT of NHB attraction trip))/employee
OCTA’s Approach

In 2015, to help figure out how to address, and to provide a better understanding of the technical and policy implications of SB743, OCTA sought outside expertise to help them:

- Monitor the status of changes to the language and rulemaking
- Provide comments to OPR on draft/final releases
- Brief staff and other key stakeholders
- Review means to estimate VMT
- Provide strategy to address CEQA changes
- Review and recommend updates to current programs, projects and guidelines

#1 – Bring out outside technical experts before SB743 goes live
Initial Actions

► Audit of OPR’s documentation, recommendations, and proposed methodology
► Presented findings to OCTA Technical Advisory Committee (TAC) Working Group
  ▪ TAC includes one representative from each City plus from the County
► Presentation focused on high-level summarization of how and why SB743 and the VMT standards were developed
► Substantial feedback and questions regarding details on implementation, process and of OPR’s assumptions

► #2 – Solicit feedback and questions from key stakeholders and people who will be responsible for implementation
Countywide Calculations

- Determined VMT/capita and VMT/employee estimates for the region and county from SCAG and OCTAM
- Determined VMT/capita and VMT/employee estimates for each city and TAZ within Orange County
- Calculated potential thresholds for residential and non-residential projects
- Developed recommendations for appropriate regional and local values
- Prepared screening maps at a citywide and TAZ level

#3 – Conduct the necessary technical analysis to support regional decisions
Screening Maps

City of Irvine TAZs VMT Per Capita at Year 2010
The city average daily VMT per capita of Irvine is estimated to be 11.6
Threshold (15% below the average) is 9.9

Orange County TAZs VMT Per Capita at Year 2010
The regional average daily VMT per capita is estimated to be 15.2
Threshold (15% below the average) is 13.8

Figure 1

Figure 6
Ongoing Work

- Conduct a review of accuracy of sketch (off-model) tools
  - Compare a series of sample projects throughout the county, using OCTAM and publicly-available and free tools
  - Determine if they can consistently replicate OCTAM results

- Document recommend modeling approach
  - Use of OCTAM; how to estimate trip lengths

- Publication of screening maps and TAZ averages

#4 – Take a leadership role and be a resource for cities and agencies
Next Steps

- Review of OPR’s assumptions for screening out/presumption of less-than-significant impacts for certain project types and locations
  - Determine recommendations for transit-proximity issue
- Review approach for transportation projects
  - Determine recommendations for elasticities and induced demand
- Review city and county traffic analysis guidelines
  - Identify means to include VMT-type analysis into standard TIA documents for CEQA
  - Determine whether LOS should remain for non-CEQA analysis
- Review CMP requirements and identify potential non-LOS based analyses

- #5 – Start planning ahead for future SB743-related changes
Summary

- Understand that OPR is only providing suggestions, not requirements (with the exception of no LOS for CEQA documents)
- It will be up to each jurisdiction and agency to determine their assumptions, methodologies and significance thresholds
- Inconsistencies may lead to legal challenges from project opponents
- To reduce this potential, consistency is needed on a countywide basis
- OCTA is taking the lead on developing a recommended set of analysis assumptions, methodologies and tools for Orange County
- OCTA is also planning for future analysis requirement changes, in case it may affect their planned approach
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