

CITY OF LOS ANGELES

CALIFORNIA

SELETA J. REYNOLDS
GENERAL MANAGER



ERIC GARCETTI
MAYOR

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
FAX (213) 972-8410

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Transportation Engineering and Planning Consultant Firms

Subject: City of Los Angeles Adoption of Vehicle Miles Traveled as the Transportation Impact Metric Under the California Environmental Quality Act

On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the State's California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the CEQA Guidelines. Over the last five years, the Departments of City Planning and Transportation led efforts to facilitate the City's transition to VMT, to prepare new Transportation Assessment Guidelines (TAG) that address these changes, and to revise the Transportation Section to the City's CEQA Threshold Guide. The intent of the SB743 and the subsequent changes to CEQA is to appropriately balance the needs of congestion management with statewide goals related to: the reduction of greenhouse gas emissions, infill development, and the promotion of public health through active transportation.

During the preparation of the new CEQA guidelines, the State's Office of Planning and Research stressed that lead agencies can apply traditional operational analysis requirements to inform land use and transportation-related decisions provided that such analyses were outside of the CEQA process. Therefore, LADOT will continue to require and review a project's site access, circulation, and operational plan to determine if any safety and access enhancements, transit amenities, intersection improvements, traffic signal upgrades, neighborhood traffic calming, or other improvements are needed. When preparing a Transportation Assessment Memorandum of Understanding (MOU), please work with the appropriate LADOT Development Review Office to determine the specific scope and parameters of this non-CEQA analysis.

While the State has replaced delay-based LOS with VMT impact criteria for purposes of CEQA, LADOT remains committed to evaluating the performance of our streets through our development review process. In our review, we rely on comprehensive performance metrics that align with the City's Mobility Plan 2035 to ensure that important safety and accessibility needs are met including critical vehicle queuing, in addition to the environmental goals captured in the new emphasis on VMT. LADOT has reconstituted the new guidance in the newly released TAG, which aims to provide clarity on methodologies, and distinction between impact categories that are required by CEQA from analyses to address access, circulation, and safety concerns.

We understand the new VMT methodology is a substantive change in scope and will likely not be reflected in the traffic studies currently in development. To manage this transition, LADOT will honor

executed MOUs for traffic studies that were processed under the prior LOS-based guidelines; however, we strongly recommend that these projects also evaluate VMT as part of their transportation analysis. The VMT analysis will help guarantee the project discloses the appropriate information as required by CEQA in the event that the project does not receive their entitlements prior to July 1, 2020, which is the State's official deadline for required compliance by all projects. In these instances where we have signed MOUs for traffic studies in process, LADOT will waive additional fees for any rescope, or supplemental analysis that accounts for the new analysis procedures in the TAG.

Please refer to the following resources for more guidance on this transition on the LADOT website by searching '[Modernizing Transportation Analysis](#)', or by selecting the hyperlinked text below:

- Project [Frequently Asked Questions](#)
- LADOT [project website](#)
- VMT Calculator [download form](#)
- LADOT [Transportation Assessment Guidelines \(TAG\)](#)
- Video: [Planning News You'll Use - VMT](#)
- Video: [Modernizing Transportation Analysis Part 1: Overview](#)
- Video: [Modernizing Transportation Analysis Part 2: Deep Dive](#)

If you have any questions that are specific to a study that you are currently processing, please contact the appropriate LADOT staff assigned to that study. All other inquiries can be directed to ladot.vmt@lacity.org, David Somers at 213-972-5966, or me at 213-972-5900.

Sincerely,

Tomas Carranza, PE
Principal Transportation Engineer

c: Rubina Ghazarian, Department of City Planning
Eddie Guerrero, LADOT
Jesus Serrano, LADOT