

# CITY OF LOS ANGELES

CALIFORNIA

SELETA J. REYNOLDS  
GENERAL MANAGER



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## DEPARTMENT OF TRANSPORTATION

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April 17, 2020

Transportation Engineering and Planning Consultant Firms

**Subject: Pandemic-related updates to LADOT's Transportation Assessment Requirements**

Due to the ongoing "Safer at Home" public order related to the COVID-19 pandemic, LADOT announces the following changes and updates related to: project scoping meetings, traffic data collection, VMT Calculator Version 1.3, non-CEQA topics, and the deadline to revise LOS-based transportation studies to comply with the statewide transition to VMT.

1. Project Scoping Meetings

All interactions with LADOT development services staff related to the review of transportation assessments shall be processed remotely - from initial project scoping sessions to submittals of final transportation assessments. Please continue to work with the appropriate office and the LADOT staff assigned to your project via emails, phone calls or video conferencing until the end of the "Safer at Home" public order when normal working conditions are restored. Review fees can be processed online at:

<https://ladot.lacity.org/businesses/fees#pay-environmental-and-construction-fees>

All of LADOT's development review services, including project condition clearances, building permit sign-offs, and reviews of proposed site plans and project-related improvements, are available using the online resources at:

<https://ladot.lacity.org/businesses/development-review>

2. Traffic Data Collection

As is clearly evident by travel behavior during the pandemic, the majority of Angelenos are following State and local directives to stay home. With schools switching to remote learning and commuters to teleworking, there are dramatic changes in travel demand volumes and patterns on all roadways throughout the state. As a result, vehicle and transit travel demands have been significantly reduced. The COVID-19 pandemic introduces a new level of uncertainty into traffic analysis.

Therefore, please note that LADOT will not accept transportation assessments that use traffic counts collected starting on March 1, 2020 until the end of the "Safer at Home" public order. Nonetheless, the current inability to collect field data that is representative of normal conditions should not

prevent the progression of transportation assessments. LADOT will work with you to consider new methods to estimate typical traffic conditions to ensure that transportation assessments proceed. Please work with the lead LADOT reviewer assigned to your study to assess and evaluate the best approach to estimate existing traffic conditions. The use of historic counts with the application of an adjustment factor is an acceptable method. If historic data is not available, we will work with you to establish other technical approaches to estimate typical traffic conditions.

3. VMT Calculator Version 1.3

LADOT appreciates the feedback that many of you have provided on your experiences using the VMT Calculator and the new guidelines. Some of that feedback has prompted us to make additional adjustments to the calculator to enhance and modify the tool in order to add new features and incorporate the latest available substantiated information. The new version will incorporate more detailed information on travel mode splits and transit ridership to predict site level VMT with greater precision. VMT Calculator Version 1.3 should be ready for release by June 2020. An updated version of the Transportation Assessment Guidelines is also underway.

4. Non-CEQA Topics: Measuring Circulation, Access, and Safety

Impact analysis based on vehicular delay such as the level of service (LOS) methodology is no longer, on its own, a significant impact under the California Environmental Quality Act (CEQA). However, the Governor's Office of Planning and Research (OPR) affirms that local governments have the authority, such as through site plan review, to use their police powers to require operational analyses to support findings that advance public health, safety, and welfare. LADOT has the authority through entitlement review to assess projects and provide recommended conditions of approval for public health, safety, and welfare as they relate to transportation impacts.

To provide a standardized process for this operational analysis review, the Transportation Assessment Guidelines (TAG) include a new non-CEQA section that addresses methods to evaluate operational deficiencies and clarifies the City's ability to impose corrective conditions on new developments to address site access, circulation, and safety challenges, especially for the most vulnerable road users. In such instances, LADOT will establish, through a transportation assessment report, the appropriate nexus and substantiate why such conditions are needed to satisfy the necessary findings to support the Department of City Planning's recommendations, or the Director's decisions.

It should also be noted that under SB743, to the extent that vehicular delay would result in a secondary impact to safety, such impacts would need to be further evaluated to determine if the impacts would be considered potentially significant under CEQA and if additional mitigation would be required.

5. LOS-Based Transportation Studies

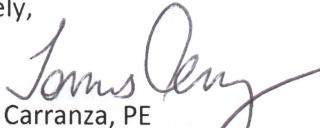
Immediately after adoption of the City's VMT-based Thresholds on July 30, 2019, LADOT announced that Memorandums of Understanding (MOUs) executed before the new guidelines were adopted would continue to be processed even if based on a LOS analysis (see attached memo for reference). LADOT stressed that these projects should include a VMT analysis to appropriately disclose all information required by CEQA in the event that the project does not receive its entitlements prior to July 1, 2020, which is the State's official deadline for required compliance by all projects.

Due to delays in project hearing and decision dates caused by the COVID-19 pandemic, LADOT offers an extension to this deadline for applicants processing LOS-based analyses if it can be demonstrated that their projects were delayed from receiving their final entitlements because of the COVID-19 pandemic. In each case, LADOT will work with the Department of City Planning to verify (i) the existence of a MOU that predated July 30, 2019, (ii) that the appropriate project environmental documentation (Draft EIR, NOI to Adopt MND or ND, or SCEA) has been circulated for public review; and (iii) that a pre-July 1, 2020 decision by the City was likely if not for delays caused by the pandemic. Please note, LADOT reserves the right to require VMT analysis for any environmental clearance if it is determined necessary to comply with applicable law, including based on the administrative record. Note also, this policy does not apply to any project using a categorical exemption. Projects relying on categorical exemptions need to conduct a VMT analysis.

In the instances where traffic studies are in process (with signed MOU's), LADOT will waive additional fees if the VMT analysis requires no mitigation review, otherwise the Technical Study review fee shall be applied. If the VMT analysis also includes a new non-CEQA analysis then a new Traffic Study Review fee will be required.

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](mailto:ladot.vmt@lacity.org), David Somers at 213-972-5966, or me at 213-435-4056.

Sincerely,

  
Tomas Carranza, PE  
Principal Transportation Engineer

c: Lisa Webber/Arthi Varma, DCP  
Rubina Ghazarian/Eddie Guerrero/Jesus Serrano, LADOT

# ATTACHMENT

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August 9, 2019

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](mailto: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