



CITY OF BEVERLY HILLS

PUBLIC WORKS & TRANSPORTATION DEPARTMENT

MEMORANDUM

TO: Planning Commission

FROM: Aaron Kunz, AICP, Deputy Director of Transportation

DATE: July 22, 2010

SUBJECT: CEQA Traffic Thresholds of Significance – Continued

INTRODUCTION

The Beverly Hills City Council discussed traffic thresholds of significance at the May 4, 2010 Council Study Session, and directed staff to proceed with a two-step process: (1) refine guidelines for more consistency with adjacent jurisdictions, and (2) undertake a full review of Traffic Thresholds of significance when funding is available to consider possible alternative methods such as establishing thresholds based on vehicle 'delay' or methods to encourage transit and pedestrian activity.

For step one, staff surveyed adjacent jurisdiction traffic threshold guidelines (Attachment 2). Based on conversations with staff at the surveyed Cities, most traffic threshold guidelines were developed administratively by internal traffic engineering and planning staff based on local infrastructure, adjacent jurisdiction thresholds, environmental factors and observation of traffic conditions and patterns.

Public Works & Transportation staff presented the Beverly Hills Planning Commission with modifications to the existing traffic thresholds of significance guidelines at its June 24, 2010 meeting (Attachment 6). Staff recommended maintaining existing thresholds for Signalized and All-Stop/4-Way unsignalized intersections; refining the definition for 2-Way Stop intersections; and modifying the daily traffic range and percentage threshold for residential streets.

Following discussion, the Planning Commission requested staff to provide further detail on the methodology and impact of the proposed change for local residential streets, and to compare a 1% versus 2% modification for signalized intersections.

RESIDENTIAL STREETS

Of the cities surveyed, staff found thresholds used by Los Angeles, Culver City and West Hollywood to be most appropriate and similar to Beverly Hills street geometric grid pattern where local residential streets directly intersect with major arterials.

Staff proposes a hybrid of the four tiers (for Los Angeles, Culver City and West Hollywood) to apply Beverly Hills environmental conditions and infrastructure.

- 0-2,000 traffic volume with 16% daily and peak hour increase
- 2,001-4,000 traffic volume with 12% daily and peak hour increase
- 4,000 or more traffic volume with 8% daily and peak hour increase

Staff did not include a tier for under 1,000ADT based on the analysis of 42 residential streets (or blocks) adjacent to potential commercial and/or multiple family development sites along major intersecting arterials, including Wilshire, Olympic and Robertson boulevards, Beverly Drive and Burton Way. Average daily traffic (ADT) counts have been conducted since 2006.

As shown in Attachment 3, the study shows only one of 42 residential streets in the affected areas would fall into a tier of 0-1,000 existing ADT. A 16% threshold is currently applied by the Cities of Los Angeles and Culver City for tier one (0-1,000) and 12% for tier two (1,000-2,000). Staff proposes one tier with a range of (0-2,000) and the 16% threshold, versus the City's current threshold of 25%. One other option was to select the 12% criteria for tier one. However, since Beverly Hills requires peak hour evaluation in addition to daily traffic, a 16% threshold appeared more feasible for the peak hour evaluation.

Beverly Hills requires satisfaction of the threshold for average daily traffic and for the peak hour of the generator. The 16% threshold for one hour is actually more stringent than a 12% threshold for a day. For example, a project could generate 200 daily trips with the peak hour activity between 3pm to 4pm at about 40 trips. Further, assume that the traffic volume for the street is 1,900 daily, but the street carries about 180 vehicles between 3pm to 4pm. Division of project's daily trip generation to street's daily volume (200/1900) yields a 10.5% increase which is not a significant impact under the Los Angeles criteria. However, division of project's peak hour activity to street's volume during the same hour period (40/180) yields 22% which is over 16% and results in a significant impact.

Similar to the tier one criteria, staff applied the same tests to tier two and three. The added requirement of peak hour evaluation in addition to daily evaluation presents more stringent thresholds. For tier two (2,000 to 4,000ADT), a 12% threshold for one hour is more stringent than 10% threshold for one day.

1% VERSUS 2% IMPACT AT SIGNALIZED INTERSECTIONS

A high number of intersections in Beverly Hills currently operate at existing LOS "E" ("poor," poor traffic flow conditions) or "F" ("failure," stop and go flow conditions). Changing the threshold to 1% will result in an overwhelming significant impact for a majority of proposed projects without any potential for mitigation. Mitigation options would be limited, or may not be available, due to the built-out conditions and existing infrastructure of the City, the existing level of service (LOS) conditions, and the limited choices for capacity enhancement (i.e., widening streets, intersections, alleys, etc).

Projects costs would increase as a result of additional traffic studies and Environmental Impact Reports, thus potentially rendering a project unfeasible for the developer and/or denying a development project that may be a benefit to the community.

Designation of 0.02 threshold is practiced by more local communities with similar characteristics of Beverly Hills than the 0.01 applied by the City and County of Los Angeles. For example, Culver City, Glendale, El Segundo, Torrance, Redondo Beach, Malibu and Long beach apply a 0.02 threshold for LOS “E” and “F”. The traffic patterns of some of these cities match Beverly Hills more than those of City of Los Angeles, which applies the 0.01 criteria to its diverse districts with variable density and urban planning patterns.

Further, the factor of 0.02 was established as the Congestion Management Program Threshold for all 78 cities within Los Angeles County based on the following rationale:

- a) It was the consensus of transportation engineers that the public could not perceive a change in volume to capacity (v/c) ratio any smaller than 0.02
- b) It was the threshold already established in the largest number of jurisdictions in the country
- c) 0.02 represents 20% of one level of service, and that it was not reasonable to allow any one development to “use up” more than 20% of one level of service without calling that an impact.

Staff reviewed the traffic impact reports of 16 projects (Attachment 4) that were presented to the City within the last 10 years, and tested a 0.01 v/c threshold level. Of the 16 projects, 13 resulted with significant impacts. Some projects produced multiple impacts at more than one intersection within the scope of their studies. This could mean a majority of future developments could result with a significant impact if 0.01 versus 0.02 v/c is applied. These developments would need to provide traffic mitigation to address the significant impacts. With fully built-out conditions of major corridors, including Wilshire and Olympic, La Cienega, Beverly, Robertson, there is limited room for capacity enhancement mitigation measure.

Staff recommends that changes to signalized intersections be considered as part of step two when alternative approached, such as delayed methodology, can be evaluated.

ANALYSIS

The Council directed staff to evaluate and update the City’s traffic thresholds in a phased approach: first, refine existing thresholds to achieve greater consistency with adjacent jurisdictions, and second, as funding becomes available, to conduct a full review of the thresholds, including alternative methods based on vehicle ‘delay’ versus level of service and exploring methods to encourage transit and pedestrian activity.

Residential Streets

Based on a review of the thresholds of adjacent jurisdictions, staff is recommending revising the City's thresholds for residential street segments, but not for signalized intersections. The threshold for residential street segments is proposed to be lowered to levels similar to Los Angeles. This means that smaller increases in traffic would result in significant impacts compared to the City's existing thresholds. While the proposed increase is not anticipated to result in a significant number of new impacts compared to existing thresholds, the revision is recommended to be approved to bring our guidelines more in-line with adjacent jurisdictions and acknowledge a greater sensitivity to increased traffic along residential streets compared to the City's commercial thoroughfares.

Signalized Intersections

No changes are proposed to the City's signalized intersections at this time. While staff evaluated lowering these thresholds to mirror Los Angeles, this approach is not recommended at this time. A volume to capacity ratio of 0.02 would not be a perceptible change circulation patterns and given the City's number of signalized intersections which currently operate at LOS E or F, and the fact that Beverly Hills also analyzes peak hour traffic (unlike Los Angeles) a 1% threshold may not necessarily be appropriate for Beverly Hills.

While staff does not recommend adjusting the thresholds for signalized intersections, staff has identified a number of implications associated with lowering the thresholds for the Commission's consideration. As indicated in Attachment 4, a 1% threshold would have resulted in a significant traffic impact in a number of projects that the City has reviewed which, under existing thresholds were determined not be an impact. Staff would expect that if a 1% threshold for signalized intersections to result in more significant impacts for future development, which in turn would likely result in a greater number of Environmental Impact Reports, longer processing times, increased staff hours and greater development costs.

In addition, due to existing limitations of our roadways, it is also likely that applying a 1% threshold would result in impacts which could not be mitigated. This means that, if a project were to be approved, the decision maker would also be required to make findings in support of a statement of overriding considerations (SOC). This would add additional uncertainties and complexities to the entitlement process.

Finally, it is important to consider that projects which result in significant and unavoidable impacts may still be approved under CEQA if the SOC findings are made, the same is not true for the City's entitlements. For instance, if a project requires Development Plan Review, one of the findings is that:

"The proposed plan will not create any significantly adverse traffic impacts, traffic safety hazards, pedestrian-vehicle conflicts, or pedestrian safety hazards."

While each case stands on its own merits and is evaluated under its own circumstances, it may be difficult for a decision maker to determine that a project does not create any significantly adverse traffic impacts if it results in significant and unavoidable traffic impacts under our CEQA thresholds. As a result, despite being able to make the required SOC findings, it is possible that Development Plan Review may not be able to be approved.

PUBLIC COMMENTS

Allan Alexander submitted correspondence (Attachment 5) raising several issues. Mr. Alexander's comments and staff's response (in *italics*) is provided below. He concludes that the existing thresholds should remain unchanged until such time as additional studies are completed.

1. Does this apply just for CEQA or does this also apply for DPR?

The proposed thresholds are for CEQA only.

2. Note for DPR there is no provision for Overriding Considerations as under CEQA—it's yes or no. Thus Traffic Threshold issue is especially critical if it applies to DPR.

This statement is addressed above.

3. Be sure if adopted it applies only prospectively (i.e. needs a "pipe line" exception)

Staff recommends that these thresholds apply to all projects for which a traffic study has not yet been completed.

4. Traffic Thresholds in residential areas should differ for R-1 vs. R-4 vs. Hybrid R-4/C zone streets

Residential streets are categorized by existing traffic volumes.

5. Why don't other cities apply residential thresholds to peak hours rather than just to ADV? Beverly Hills appears to be the only city that applies the standard to peak hours and ADV. Need to think about that. Did they all get it wrong or is Beverly Hills wrong?

Staff believes it is appropriate to evaluate peak hour conditions as they represent the project's greatest traffic contribution to the existing traffic pattern.

6. Need to test against prior projects to see if the new standards make sense. Remember that the residential standard for Montage turned out to be nonsensical –12 additional trips in the residential streets and it exceeded the residential threshold.

Staff has evaluated the proposed thresholds against past projects.

7. Remember it is as detrimental to the City to reject a project based upon a standard that in fact was not going to do material traffic harm as it is to approve a project that would be a material traffic problem.

No response needed.

8. Remember residents in an area often oppose new development near them out of fear of change. City standards must be rationale and well conceived.

No response needed.

9. For all these reasons I think the City should seriously consider spending the money to get expert consultation (\$50,000 noted in Staff Report for meeting of May 4, 2010) before moving forward on any change, especially when the City is adopting this as a Municipal Code provision and not just as a "Policy".

No response needed.

RECOMMENDATION

It is recommended that the Planning Commission adopt the attached resolution adopting thresholds of significance for traffic impacts.

Attachment 1:	Resolution
Attachment 2:	Comparison of Traffic Thresholds for Adjacent Jurisdictions
Attachment 3:	Residential Streets ADT Analysis
Attachment 4:	1% vs. 2% Project Analysis
Attachment 5:	Letter from Allan Alexander dated June 21, 2010
Attachment 6:	Report to Planning Commission for meeting of June 24, 2010, (including attachments)

RESOLUTION NO. _____

A RESOLUTION OF THE PLANNING COMMISSION OF THE
CITY OF BEVERLY HILLS ADOPTING THRESHOLDS OF
SIGNIFICANCE FOR TRAFFIC IMPACTS

WHEREAS, the Planning Commission finds and determines that the City of Beverly Hills' existing thresholds of significance for certain traffic impacts, which are utilized in the City's actions implementing the California Environmental Quality Act (CEQA), have not been amended in over twelve (12) years and are not reflective of the thresholds used by adjacent jurisdictions; and

WHEREAS, on June 24, 2010, the Planning Commission held a public meeting to discuss potential changes to the thresholds, and continued the meeting and discussion to its public meeting on July 22, 2010. Notice of the June 24th meeting was published in the *Beverly Hills Courier* newspaper, and opportunities for public input were provided at both the June 24 and July 22, 2010 meetings.

NOW, THEREFORE, the Planning Commission of the City of Beverly Hills does resolve as follows:

Section 1. The Planning Commission finds and determines based on the staff reports and research, expert testimony from the City's Transportation Division staff, and public testimony, that the revised thresholds are more in line with those used by adjacent jurisdictions and more appropriately evaluate the traffic impacts of new development projects on the City's residential streets.

Section 2. The revised traffic thresholds change the City's existing guidelines for analysis of the traffic impacts on the City's residential streets caused by new development. The

revised thresholds are a means to evaluate impacts during the environmental review process required by CEQA and their adoption is not subject to environmental review by CEQA.

Section 3. The Planning Commission hereby adopts the revised Traffic Thresholds of Significance for the City of Beverly Hills, a copy of which is attached hereto as Exhibit "A".

Section 4. The Secretary of the Planning Commission shall certify to the passage, approval, and adoption of this resolution, and shall cause this resolution and his certification to be entered in the Book of Resolutions of the Planning Commission of this City and a copy of this Resolution be forwarded to the City Council.

Adopted: July 22, 2010

Lili Bosse
Chair of the Planning Commission of the
City of Beverly Hills, California

Attest:

Secretary

Approved as to form:

Approved as to content:

David M. Snow
Assistant City Attorney

Susan Healy Keene, AICP
Director of Community Development

EXHIBIT A

Traffic Thresholds of Significance

CITY OF BEVERLY HILLS

Traffic Thresholds of Significance (adopted by Planning Commission on July 22, 2010, by Resolution No. ____).

The following is the recommended traffic thresholds of significant impact for 4 different scenarios:

1. Threshold of Impacts at Signalized Intersections:

Calculation Methodology: Intersection Capacity Utilization (ICU), using criterion similar to Congestion Management Program (CMP). Selected lane capacity of 1,600 vehicles per hour.

An impact will be considered significant if traffic generated by a project causes an increase of:

- 0.020 or more on V/C at the final LOS "F"
- 0.020 or more on V/C at the final LOS "E"
- 0.040 or more on V/c at the final LOS "D" or better

2. Threshold of Impacts at Unsignalized (all-way stop) Intersections:

Calculation Methodology: ~~The~~ 1994 Based on the most current edition of Highway Capacity Manual.

An impact will be considered significant if the following increase of average total delay per vehicle results in:

- 3.0 seconds or more average total delay at the final LOS "F"
- 3.0 seconds or more average total delay at the final LOS "E"
- 4.0 seconds or more average total delay at the final LOS "D"

3. Threshold of Impacts at Unsignalized (2-way stop) Intersections:

Calculation methodology: Highway Capacity Manual (latest edition) ~~special report 209~~ or a comparable software.

~~Significant Impact: A Change in LOS to LOS E OR F from LOS D or better that occurs on any direction of travel.~~

Significant Impact: A Change in level of service (comparison of cumulative plus without project, to cumulative plus with project) on any direction of travel:

- LOS D or better to LOS E or worse
- LOS E to LOS F
- LOS F to LOS F (resulting in increase of 10 or more average total delay (sec/veh) on any direction.

4. Threshold of Impacts at Residential (Local) Streets:

Significant Impact:

~~I ADT less than 3,750, project increases ADT by 25% and/or increases of the peak hour by 25%.~~

- I. ADT less than 2,000 volume per day (vpd): project increases ADT by 16%, or increases peak hour by 16% or both.

~~II ADT greater than 3,750 but less than 6750, project increases ADT by 12.5% and/or increases the peak hour by 12.5%.~~

- II. ADT greater than 2,001 but less than 4,000 vpd: project increases ADT by 12% or more, or increases peak hour by 12% or more or both.

~~III ADT greater than 6,750, project increases ADT by 6.25% and/or increases the peak hour by 6.25%.~~

- III. ADT greater than 4,001 vpd: project increases ADT by 8% or more, and increases peak hour by 8% or more or both.

Attachment 2

Comparison of Traffic Thresholds for Adjacent Jurisdictions

SIGNALIZED INTERSECTIONS

	Beverly Hills	Culver City	Los Angeles	Santa Monica*	West Hollywood*	Pasadena
LOS "D" (0.81-0.900)	4% or more increase in v/c	4% or more increase in v/c	2% or more increase in v/c	Average delay by any amount for collector; or 15 seconds or more for arterial; or becomes LOS E or F	12 seconds or more delay	3% or more increase in v/c
LOS "E" (0.91-1.00)	2% or more increase in v/c	2% or more increase in v/c	1% or more increase in v/c	Average delay increases by any amount	12 seconds or more delay	2% or more increase in v/c
LOS "F" (over 1.00)	2% or more increase in v/c	2% or more increase in v/c	1% or more increase in v/c	Half Percent (1/2) increase in v/c	8 seconds or more delay	2% or more increase in v/c

* Cities of Santa Monica and West Hollywood measure seconds of delay.

RESIDENTIAL STREETS

Beverly Hills Existing ¹	Beverly Hills Proposed	Culver City ²	Los Angeles ³	Santa Monica ⁴	West Hollywood ⁵	Pasadena ⁶
0 - 3,750 ADT: 25% increase and 25% peak hour increase	0 - 2,000 ADT: 16% increase and 16% peak hour increase	0 - 99 ADT: 120 or more trips	0-1,000 ADT: 120 trips or more	1 - 1,250 ADT: 25% or more increase	0-2,000 ADT: 12% or more increase	0-2,000 ADT: 2.4% (staff review)
3,750 - 6,750 ADT: 12.5% increase and 12.5% increase peak hour	2,000 - 4,000 ADT: 12% increase and 12% peak hour increase	1,000 - 1,999 ADT: 12% or more increase of final ADT	ADT 1,000-2,000: 12% or more increase	1,250 - 2,250 ADT: 12.5% or more increase	2,001-3,000 ADT: 10% or more increase	2,000+ ADT: 2.5%-4.9% (study required if count greater than 2K; plus soft mitigation)
6,750+ ADT: 6.25% increase	4,000 or more ADT: 8% increase and 8% peak hour increase	2,000 - 2,999 ADT: 10% or more increase of final ADT	ADT 2,000 or more: 10% or more increase	2,250 or more ADT: net increase of 1 trip	3,001-6,749 ADT: 8% or more increase	2,000+ ADT: 5.0-7.4% (study if +2K; soft mitigation; physical mitigation may be required)
		3,000+ ADT: 8% or more increase of final ADT	ADT 3,000 or more: 8% or more increase		6,750+ ADT: 6.25% or more increase	2,000+ ADT: 7.5% and more (initial study +2K; soft mitigation; extensive physical mitigation may be required; project alternatives may be considered)

LOS: Level of Service

ADT: Average Daily Traffic

V/C: Volume to Capacity Ratio

1. City of Beverly Hills, Public Works Dept - Engineering Div., Existing Thresholds, February 19, 1998.
2. City of Culver City, June 17, 2009, Planning Commission, Agenda Item A-1, Discussion on Proposed Updates of the Citywide Traffic Study Criteria.
3. City of Los Angeles, Draft Los Angeles CEQA Threshold Guide, L.4-2.A, Neighborhood Intrusion Impacts, Significant Threshold, 2006, p. L.4-2.
4. City of Santa Monica.
5. City of West Hollywood, City Council Meeting, October 19, 2009, Item 5.A, Traffic Study Thresholds.
6. City of Pasadena, Transportation Planning & Development Division-DOT, Transportation Impact Review Current Practice and Guidelines 2005, Section 2-Thresholds, p.2.2.

Attachment 3
Residential Streets ADT Analysis

THRESHOLDS OF SIGNIFICANCE FOR RESIDENTIAL STREETS ADT COMPARISON ANALYSIS

ADT threshold analysis for residential street subject to future developments .

Street	ADT (0-2,000)	Adding 15% For 1 st project	Adding 15% for 2 nd project	Adding 11% for the 1 st project	Adding 11% for 2 nd project	
Walden	830	954	1097			Stayed in tier
Peck	1081	1243	1425			Stayed in tier
Almont	1055	1213	1384			Stayed in tier
Wetherly	1010	1162	1336			Stayed in tier
Hamel	1100	1265	1454			Stayed in tier
Trenton	1200	1380	1587			Stayed in tier
Canon	1340	1540	1770			Stayed in tier
Stanley N.	1344	1545	1776			Stayed in tier
Oakhurst	1450	1667	1917			Stayed in tier
Lasky	1597	1836	2111			Moved to next
Le Doux	1657	1905	2190			Moved to next
Parkway	1480	1700	1955			Stayed in tier
Tower Dr.	1680	1863	2142			Moved to next
Clark	1416	1628	1872			Stayed in tier
Carson	1170	1345	1546			Stayed in tier
Swall N.	1460	1680	1932			Stayed in tier
Street	ADT (2,001 – 4,000)	Adding 15% For 1 st project	Adding 15% for 2 nd project	Adding 11% for the 1 st project	Adding 11% for 2 nd project	
Palm	2040			2264	2513	Stayed in tier
Rodeo	2150			2387	2649	Stayed in tier
Camden	2100			2331	2587	Stayed in tier
Stanley S.	2171			2410	2675	Stayed in tier
Maple	2187			2427	2993	Stayed in tier
Elm	2200			2442	2710	Stayed in tier
Alden	2300			2553	2833	Stayed in tier
Swall S.	2300			2553	2833	Stayed in tier
Bedford	2365			2635	2924	Stayed in tier
Arnaz	2400			2664	2957	Stayed in tier
McCarty	2400			2664	2957	Stayed in tier
Hamilton	2430			2697	2993	Stayed in tier
El Camino	2950			3275	3635	Stayed in tier
Linden	2800			3108	3450	Stayed in tier
Reeves	2980			3307	3670	Stayed in tier
Durant	3040			3374	3745	Stayed in tier
Elevado	3215			3568	3960	Stayed in tier

Street	ADT (4,000 +)	Adding 15% For 1 st project	Adding 15% for 2 nd project	Adding 11% for the 1 st project	Adding 11% for 2 nd project	
Willaman	4020					Same as LA
Crescent	4100					Same as LA
Lapeer N.	4100					Same as LA
Roxbury south	4100					Same as LA
Spalding	4125					Same as LA
Lapeer S.	4300					Same as LA
Charleville west	4370					Same as LA
Carmelia	4610					Same as LA
Gregory w/o ev	4650					Same as LA
Clifton east	5500					Same as LA
Charleville east	5770					Same as LA
3 RD	6400					Same as LA
Rexford	6400					Same as LA
Gale	7265					Same as LA

Attachment 4
1% vs. 2% Project Analysis

**THRESHOLDS OF SIGNIFICANCE
1% vs. 2% COMPARISON ANALYSIS**

Testing threshold of significant for signalized intersections with 0.01 increase of v/c versus the existing 0.02 v/c increase for 18 projects reviewed the past 5 years.

	Project	Significant impact if Threshold was 0.01 v/c at LOS OF "E" and "F"?	Significant Impact with the Existing threshold= 0.02 v/c at LOS "E" and "F"
1	Annenberg	Yes at 9 additional intersections (0.015-0.011-0.012-0.015-0.019-0.013).	Yes with 3 intersection
2	Hilton	Yes at 1 additional intersection (0.015)	Yes at 1 intersection
3	9200 Wilshire	No significant impact	No significant impact
4	8767 Wilshire-09	Yes at 2 additional intersections(0.014-0.016)	Yes at 1 intersection
	8687 Wilshire-06	No significant impact	Yes at 1 intersection
5	257 N. Canon	Yes at 2 additional intersections (0.012-0.014)	No significant impact
6	9900 Wilshire	No significant impact	No significant impact
7	121 San Vicente	Yes at 1 intersection (1.097)	No significant impact
8	Gateway	Yes at 2 additional intersections (0.017-0.016)	Yes at 1 intersection
9	Gateway- Parcel 2 only	Yes at 2 additional intersections (0.015-0.011)	No significant impact
10	WMA	Yes at 9 additional intersections	Yes at 4 intersections

	Project	Significant impact If Threshold was 0.01 v/c at LOS OF "E" and "F"?	Significant impact with the Existing threshold= 0.02 v/c at LOS "E" and "F"
11	The Crescent project	Yes at one intersection	No significant impact
12	Montage	Yes at 3 additional intersections (0.014-0.011-0.015)	Yes at 2 intersection
13	8600 Wilshire	No significant impact	No significant impact
14	101 La Cienega	Yes at 2 intersections (0.011-0.013)	No significant impact
15	8536 Wilshire	Yes at 1 intersection	No significant impact
16	9091 Wilshire	Yes at 1 intersection	No significant impact
17	320 Rodeo	Yes at 1 intersection (0.015)	No significant impact
18	8800 Burton Way	Yes at 1 intersection (0.014)	No significant impact

Attachment 5

Letter from Allan Alexander dated June 21, 2010

Threshold Criteria Issues

By Allan Alexander

June 21, 2010

For Planning Commission Meeting of June 24, 2010

1. Does this apply just for CEQA or does this also apply for DPR?
2. Note for DPR there is no provision for Overriding Considerations as under CEQA—it's yes or no. Thus Traffic Threshold issue is especially critical if it applies to DPR.
3. Be sure if adopted it applies only prospectively (i.e. needs a "pipe line" exception)
4. Traffic Thresholds in residential areas should differ for R-1 vs. R-4 vs. Hybrid R-4/C zone streets
5. Why don't other cities apply residential thresholds to peak hours rather than just to ADV? Beverly Hills appears to be the only city that applies the standard to peak hours and ADV. Need to think about that. Did they all get it wrong or is Beverly Hills wrong?
6. Need to test against prior projects to see if the new standards make sense. Remember that the residential standard for Montage turned out to be nonsensical –12 additional trips in the residential streets and it exceeded the residential threshold.
7. Remember it is as detrimental to the City to reject a project based upon a standard that in fact was not going to do material traffic harm as it is to approve a project that would be a material traffic problem.
8. Remember residents in an area often oppose new development near them out of fear of change. City standards must be rationale and well conceived.
9. **For all these reasons I think the City should seriously consider spending the money to get expert consultation (\$50,000 noted in Staff Report for meeting of May 4, 2010) before moving forward on any change, especially when the City is adopting this as a Municipal Code provision and not just as a "Policy".**

Comments from the Public

Staff received memo from Allan Alexander, dated June 21, 2010 (Attachment x). Mr. Alexander raises several issues in the letter

"The proposed plan will not create any significantly adverse traffic impacts, traffic safety hazards, pedestrian-vehicle conflicts, or pedestrian safety hazards

Attachment 6

Report to Planning Commission for meeting of June 24, 2010



CITY OF BEVERLY HILLS

PUBLIC WORKS & TRANSPORTATION DEPARTMENT

MEMORANDUM

TO: Jonathan Lait, AICP, Assistant Director of Community Development
FROM: Aaron Kunz, AICP, Deputy Director of Transportation
DATE: June 15, 2010
SUBJECT: CEQA Traffic Thresholds of Significance

At the May 4, 2010 City Council Study Session, the City Council discussed the City's thresholds of significance per the request of Council Member Mirisch. The City Council's discussion focused on traffic thresholds of significance and directed staff to proceed with a two-phase approach:

1. Refine guidelines for more consistency with adjacent jurisdictions using a 'traditional' approach.
2. When funding is available, undertake a full review of Traffic Thresholds of significance and consider alternative methods such as establishing thresholds based on vehicle 'delay' or methods to encourage transit and pedestrian activity.

Most community's surveyed do not have 'adopted' thresholds of significance, but have guidelines developed administratively by staff. The Cities of Culver City, Pasadena, Glendale, and Burbank developed existing traffic thresholds or standards by their (long-term) internal professional staff of traffic engineers and planners based on their local environment, street infrastructure, traffic conditions, and personal observation. The guidelines have been applied a minimum of 10 years for most jurisdictions.

Staff originally anticipated that the initial refinements would be developed administratively. After further discussions with the City Attorney's office, it was agreed that the Planning Commission should formally consider the proposed changes.

In refining thresholds, staff's goal was to achieve a balance where thresholds would be stringent enough provide the basis for the Planning Commission to require mitigation measures for a particular project, yet not too stringent where even small projects would require Environmental Impact Reports and/or require the Planning Commission to prepare a statement of overriding consideration.

Exhibit 1 provides a redline version of staff's proposed modifications of the thresholds. Staff is recommending the following:

- Maintain the existing thresholds of significance for signalized intersections where a project is considered to have a significant impact at intersections where Levels of Service (LOS) of E or F where the volume/capacity (v/c) increases by .02 or greater. This is consistent with the Cities of Pasadena and Glendale. Although the City's thresholds of significance for signalized intersections are less stringent than the City of Los Angeles for intersections operating at LOS E or F (a v/c increase of .01 or greater), the City of Beverly Hills has a larger proportion of intersections that operate at levels "E" and "F."
- Modify the thresholds of significance for two-way stops to add a vehicle delay component. Current thresholds for two-way stops can be interested that one additional vehicle at Levels of Service E or F is a significant impact.
- Modify residential street thresholds in accordance to be more in line with neighboring communities while maintaining the additional 'peak-hour' threshold. The residential street threshold in Beverly Hills is, overall, higher than Culver City, Los Angeles, Pasadena, Santa Monica and West Hollywood. While the 'peak-hour' threshold balances out the Beverly Hills thresholds to some extent with other communities, the City Council expressed concern that the City's residential street thresholds should be more in line with other jurisdictions. Staff believes that proposed revised thresholds would accomplish that goal without being too onerous.
- As a matter of practice, when calculating residential street significance, staff proposes that the increase and the threshold level be calculated on the base Average Daily Traffic, not on the base plus project. This calculation has been inconsistent in past traffic studies.

Conclusion

Staff recommends that the Planning Commission approve the revised traffic thresholds outlined in Exhibit 1.

Exhibit 1 – Proposed revisions to City's Traffic Thresholds.

Attachment 1 – May 4, 2010 Staff Report to City Council.

http://beverlyhills.granicus.com/MetaViewer.php?view_id=2&clip_id=1915&meta_id=105981

EXHIBIT 1

PROPOSED REVISIONS TO THRESHOLDS



CITY OF BEVERLY HILLS
TRANSPORTATION PLANNING & ENGINEERING

MEMORANDUM

TO: File

FROM: Bijan Vaziri P.E., Traffic Engineer

DATE: June 16, 2010

SUBJECT: 2010 Revision of Recommended Thresholds of "Significant Impact" on Traffic Generated by New Developments

The following is the recommended traffic thresholds of significant impact for 4 different scenarios:

1. Threshold of Impacts at Signalized Intersections:

Calculation Methodology: Intersection Capacity Utilization (ICU), using criterion similar to Congestion Management Program (CMP). Selected lane capacity of 1,600 vehicles per hour.

An impact will be considered significant if traffic generated by a project causes an increase of:

- 0.020 or more on V/C at the final LOS "F"
- 0.020 or more on V/C at the final LOS "E"
- 0.040 or more on V/c at the final LOS "D" or better

2. Threshold of Impacts at Unsignalized (all-way stop) Intersections:

Calculation Methodology: ~~The 1994~~ Based on the **most current edition of** Highway Capacity Manual.

An impact will be considered significant if the following increase of average total delay per vehicle results in:

- 3.0 seconds or more average total delay at the final LOS "F"
- 3.0 seconds or more average total delay at the final LOS "E"
- 4.0 seconds or more average total delay at the final LOS "D"

3. Threshold of Impacts at Unsignalized (2-way stop) Intersections:

Calculation methodology: Highway Capacity Manual (latest edition) special report 209 or a comparable software.

~~Significant Impact: A Change in LOS to LOS E OR F from LOS D or better that occurs on any direction of travel.~~

Significant Impact: A Change in level of service (comparison of cumulative plus without project, to cumulative plus with project) on any direction of travel:

- LOS D or better to LOS E
- LOS E to LOS F
- LOS F to LOS F (resulting in increase of 10 or more average total delay (sec/veh) on any direction.

4. Threshold of Impacts at Residential (Local) Streets:

Significant Impact:

~~I- ADT less than 3,750, project increases ADT by 25% and/or increases of the peak hour by 25%.~~

- I. ADT less than 2,000 volume per day (vpd): project increases ADT by 16%, and/or increases peak hour by 16%.

~~II- ADT greater than 3,750 but less than 6750, project increases ADT by 12.5% and/or increases the peak hour by 12.5%.~~

- II. ADT greater than 2,001 but less than 4,000 vpd: project increases ADT by 12% or more, and/or increases peak hour by 12% or more.

~~III- ADT greater than 6,750, project increases ADT by 6.25% and/or increases the peak hour by 6.25%.~~

- III. ADT greater than 4,001 vpd: project increases ADT by 8% or more, and/or increases peak hour by 8% or more.

ATTACHMENT 1

CITY COUNCIL AGENDA REPORT DATED MAY 4, 2010



CITY OF BEVERLY HILLS STAFF REPORT

Meeting Date: May 4, 2010

To: Honorable Mayor & City Council

From: Jonathan Lait, AICP, Assistant Director of Community Development
Aaron Kunz, AICP, Deputy Director of Transportation

Subject: REQUEST OF COUNCIL MEMBER MIRISCH TO DISCUSS CEQA THRESHOLDS OF SIGNIFICANCE

Attachments:

1. CEQA environmental study areas
2. Comparison of Traffic Thresholds Among Other Cities
3. Traffic Impact Level Of Service Comparison
4. Descriptions of Levels of Service (Highway Capacity Manual)
5. 2005 Report to City Council on Neighborhood Traffic Thresholds of Significance

INTRODUCTION

The California Environmental Quality Act (CEQA) requires public agencies to consider of the environmental impacts of all projects that are not otherwise exempt, and to address any impacts to the extent their authority allows. To assess impacts, the State encourages the adoption of local thresholds of significance. The City of Beverly Hills has not gone through a formal adoption process and instead uses guidelines to assess impacts, which has advantages and disadvantages that are discussed in this report.

DISCUSSION

Background

CEQA was first established in 1970 and has evolved over the years through legislative amendments and court challenges. The primary purpose of CEQA is to ensure that there is a public process in which decision-makers evaluate a project and consider its potential to have an effect on the environment.

Meeting Date: May 4, 2010

Item Number:

All discretionary projects^a require assessment of environmental impacts under CEQA. The majority of cases, however, qualify for legislative exemptions^b and do not require extensive environmental analysis. Projects not exempt require more review, which would be in the form of a Negative Declaration, Mitigated Negative Declaration or Environmental Impact Report. This expanded analysis may conclude that a project has a negligible impact or an identified impact that either can or cannot be mitigated. Mitigated impacts are ones where the significant environmental impact is reduced to less than significant through the incorporation of project changes or conditions of approval. The significance of an unmitigated impact can be lessened through mitigation, but remains a significant impact to the environment.

Importantly, the CEQA does not require denial of a project even if the project results in a significant impact to the environment. CEQA does require that a reasonable (not exhaustive) attempt be made to address the impacts of a project on the environment and to have those impacts evaluated openly in a public forum and considered by the decision-making body. Sometimes the public benefits of a project are determined to outweigh the adverse effects to the environment and the project may be approved, regardless of adverse environmental effects.^c

Thresholds of Significance

In evaluating impacts, the CEQA Guidelines^d identify 17 study areas to evaluate, including traffic, cultural resources, and aesthetics (Attachment 1 describes these study areas except for traffic, which is more fully discussed below). To help assess whether a project may have an impact on the environment, the CEQA Guidelines encourage each lead agency to develop Thresholds of Significance.^e The CEQA Guidelines also set forth a required process to adopt thresholds if the lead agency chooses to adopt standards.

The State CEQA Guidelines has two essential requirements for adopted thresholds of significance:

1. That they be supported by substantial evidence, and
2. That they be adopted through a public hearing process.

^a CEQA defines a project as: "...an activity which may cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment..." (Public Resources Code §21065) This includes actions directly undertaken by a public agency, those funded by a public agency, and private actions approved by a public agency.

^b Projects are commonly found to be categorically exempt, meaning that they are classified by the State to be minor in nature or actually environmentally beneficial (e.g. new regulations) and do not warrant further environmental review (14 Cal. Code Regs. §15300 to §15332) unless unusual circumstances are present. The State also has a set of statutory exemptions, projects that the Legislature has chosen to exempt from environmental review, such as The Olympics or emergency projects (14 Cal Code Regs. §15260 to §15285).

^c When a public agency approves a project with significant environmental impacts, it is required to adopt a Statement of Overriding Considerations, which explains other considerations beyond the environmental issues that the public agency weighed in its decision to approve the project (14 Cal. Code Regs. §15093).

^d The State CEQA Guidelines are the administrative regulations that implement the legislation (California Code of Regulations (CCR), Title 14, Chapter 3, §15000 et seq.). They are prepared by the Governor's Office of Planning and Research (OPR), as required by CEQA (Public Resources Code §21083).

^e CEQA Guidelines Section 15064.7.

Meeting Date: May 4, 2010

Item Number:

A lead agency is not required to adopt thresholds of significance. The City of Beverly Hills does not have adopted standards and instead uses staff-generated guidelines that have evolved over time based on professional staff input, consultant work, and consideration of standards used in the industry and other local municipalities. During 2005, the City Council did sanction a change proposed by staff to the neighborhood thresholds, but did not actually adopt the threshold. The 2005 staff report is attached as Attachment 5.

Evaluating Environmental Impacts

When evaluating impacts, city staff and environmental consultants refer to generally applicable standards, if established, such as the South Coast Air Quality Management District standards in the case of air analysis. Other topic areas that are more sensitive to a local environment, such as impacts caused by shade and shadows, parking or the loss of locally significant cultural resource have been developed as guidelines over the preceding years.

For Beverly Hills, transportation and traffic impacts associated with a project are more common compared to the other study topics.

Assessing Traffic Impacts

The City of Beverly Hills developed its existing *Recommended Thresholds of Significant Impact* guidelines in 1997 as a result of a collective effort by the Westside Cities to develop a uniform standard and strategy for identifying impacted traffic conditions on local arterial and residential streets. Following a year of collaborative discussions, Meyer, Mohaddes Associates recommended a set of significant threshold criteria. Ultimately, the Cities could not agree upon uniform traffic thresholds and each established separate thresholds. Recently, The City of Beverly Hills has four types of traffic thresholds. Three of the thresholds apply to intersections and one to residential streets. The thresholds for intersections are based on a Level of Service (LOS) calculation and the residential streets are based on an increase in the number of vehicles. LOS rates intersections from A to F based on a formula of (v/c) meaning traffic volume (v) divided by capacity (c). For example, if at an intersection, the traffic volume 1,000 vehicles and the capacity is 1,000 vehicles, the v/c ratio "1.00", or level of service F.

Staff surveyed eight cities traffic thresholds as shown in Attachment 2. A comparison of the two most commonly used thresholds is described below.

SIGNALIZED INTERSECTIONS:

The City of Beverly Hills has the same significance threshold levels at signalized intersections as the Cities of Pasadena and Glendale at Level Of Service (LOS) E and F (v/c is increased 0.02 or greater), but less stringent thresholds compared to the border cities of Culver City and Los Angeles, and the County of Los Angeles (0.01). The City of West Hollywood recently amended its guidelines to implement a "delay" approach methodology to calculate significant thresholds at all intersections.

RESIDENTIAL STREETS

The second most commonly used thresholds are impacts to residential streets. As shown on attachment 2, overall, the City of Beverly Hills has less stringent thresholds for low volume residential streets than the jurisdictions surveyed, including Los Angeles and

Meeting Date: May 4, 2010

Item Number:

West Hollywood. Beverly Hills does include an additional 'peak-hour' threshold for residential streets which in effect helps equalize the thresholds compared to other Cities.

Additionally, the City of Beverly Hills has Thresholds of Significance for non-signalized intersections that are relatively consistent with other jurisdictions surveyed.

Beverly Hills Traffic Thresholds of Significance were developed on most commonly used methodologies and employ a traditional approach. Some Cities, including West Hollywood and Palo Alto, have taken a different approach by basing their Thresholds on vehicle 'delay' or methods to encourage transit and pedestrian activity. Pursuing an overall new approach would require significant staff and/or consultant time, public process, and hearings by the Planning Commission. Staff recommends an initial step of revising existing thresholds for consistency with neighboring jurisdictions. At a later date, once other Cities have fully tested alternative approaches, the City may want to consider undertaking a full review of Traffic Thresholds of Significance.

Approach to Assess Impacts (Thresholds of Significance vs. Guidelines)

Formally adopted Thresholds of Significance provide:

- an opportunity for the public to provide input on the development of thresholds
- consistent application of thresholds to all projects
- predictable outcomes

Establishing fixed thresholds, however, requires consistent application of those standards to project impact analysis and may result in the preparation of more environmental impact reports, increased application costs, and extended application processing times. Additionally, building community support and consensus on controversial thresholds can be challenging. Depending on what thresholds are desired, consultants may be required to supplement staff's expertise.

Conversely, the continued use of guidelines provides:

- greater flexibility to conduct project-specific analysis that takes into account unusual circumstances
- opportunity to adjust/update guidelines more quickly as technology and the state of the art evolve
- consistency with past practice

Establishment of Thresholds / Guidelines

Attachment A includes information on the various study topics. Having thresholds or guidelines on some environmental impact areas is valuable and will likely evolve over time. For instance, the city's General Plan calls for further evaluation of cultural resources. If the city were to advance a historic preservation ordinance in the future, establishing a threshold or guideline to assess the impact of the loss of a potential historic resource would be appropriate.

Absence any change in policy, the city will continue to evaluate impacts to the environment, including traffic and parking related impacts, using approaches that are consistent with past practice.

Meeting Date: May 4, 2010
 Item Number:

Alternatives

The City Council may direct staff to refine guidelines or begin a process of establishing CEQA thresholds of significance. The options include:

1. No change, maintain current policies and procedures.
2. Direct staff to refine guidelines that are more consistent with nearby jurisdictions.
3. Initiate a public process to formally adopt thresholds for traffic.
4. Initiate a public process to formally adopt thresholds for traffic and other topic areas, as directed.

Work Priorities

Two city divisions, Planning and Transportation would be involved in amending the guidelines or establishment of thresholds. Current work programs are provided below. If the Council is interested in advancing changes to the way the city studies environmental impacts, direction would be required as to the priority of this work effort with regard to other initiatives currently underway or pending.

Planning

Housing Element
 Medical Office Use Zoning
 Commercial CID Standards
 Trousdale/Hillside View Preservation
 Expansion of Design Review to Hillside Area
 General Plan Implementation/
 Zoning Code Update

Transportation

Santa Monica Boulevard Signals
 Metro Subway EIR and Actions
 Taxi Franchising
 Lexus Traffic Study
 Street Sign Program
 Online Parking Permit Exemption Program

FISCAL IMPACT

The fiscal impact of the developing adopted thresholds of significance will depend on how extensive a body of thresholds the City desires to adopt. It is estimated that \$50,000 of consultant resources will be needed to augment staff in the assemblage of additional supporting information in the development of new transportation thresholds. Additional funds would also need to be appropriated for consultant services if other thresholds are to be refined or developed, depending on the scope of changes/additions to current thresholds and guidelines.

Meeting Date: May 4, 2010
Item Number:

RECOMMENDATION

It is recommended that the City Council direct staff to update its traffic guidelines to be more consistent with other local jurisdictions.


Susan Healy Keene, AICP
Approved By

Attachment 1

ATTACHMENT 1 CEQA STUDY AREAS*

AESTHETICS: Whether a project would impair views and vistas; glare, nighttime light, and shade/shadow are also usually evaluated under this heading.

City Guideline - Visual impacts are usually handled through a qualitative discussion with visual simulations comparing "before and after". Nighttime glare is typically handled using the City's five footcandle standard for residential. In the past, Beverly Hills has applied Los Angeles' three-hour/day shadow standard to sensitive receptors such as residential uses, schools, and parks.

AGRICULTURAL / FOREST RESOURCES: Whether a project would impact or result in a loss of farmland and/or forest.

City Guideline - Not applicable, as no such resources exist in the city.

AIR QUALITY: Whether a project would expose people to pollutants or odors, or impede or violate air quality plans and standards.

City Guideline - As with most municipalities in Southern California, Beverly Hills regularly applies the thresholds developed by the South Coast Air Quality Management District.

BIOLOGICAL RESOURCES: Whether a project would directly impact endangered species, affect habitat and/or routes of wildlife movement or migration, conflict with plans/policies protecting biological resources or habitat.

City Guideline - The EIRs rely on expert assessments, which take into consideration such standards as Federal Legislation on endangered species, migratory corridors, nesting raptors, and others.

CULTURAL RESOURCES: Whether a project would impact historical, anthropological, paleontological, unique geological, or sacred resources.

City Guideline - Most California communities rely on experts to assess resources, based on the historic resource and impact definitions provided in the State CEQA Guidelines and the Secretary of the Interior standards with respect to significance of the effects and mitigation.

GEOLOGY / SOILS: Whether a project would expose people and/or property to seismic hazards and/or other unstable geological conditions, or present septic system issues in absence of sewer systems.

City Guideline - These are usually handled through a geotechnical investigation and addressed through engineering standards.

GREENHOUSE GAS EMISSIONS: Whether a project would generate significant greenhouse gases or conflict with plans/policies/regulations for reducing greenhouse gas emissions.

City Guideline - After a project's greenhouse gas emissions have been calculated, a qualitative evaluation of the project's contribution to cumulative impact serves as a threshold of significance. As this is a new topic area, and many communities rely on guidelines released and periodically updated by the California Air Pollution Control Officers Association (CAPCOA). The Governor's Office of Planning and Research has been assigned the task of developing more standardized guidelines for addressing greenhouse gas emissions.

HAZARDS & HAZARDOUS MATERIALS: Whether a project will result in danger to the public, expose people to hazardous material, present hazards to aviation, interfere with emergency response, and/or expose people and property wildfire hazards.

City Guideline - Because industrial uses are not typically proposed in Beverly Hills, the hazards associated with new development usually pose no greater risk than the existing development. The City relies on compliance with EPA and Cal OSHA requirements to minimize hazards.

ATTACHEMENT 1
CEQA Study Areas

HYDROLOGY / WATER QUALITY: Whether a project would contaminate or deplete local groundwater, cause flooding or erosion, and/or pollute surface water.

City Guideline - Hydrology is handled together with the geology/soil analysis—a technical analysis relying on engineering standards and, in this case, EPA standards.

LAND USE / PLANNING: Whether a project would divide an established community or conflict with any conservation or land use plan adopted to protect the environment.

City Guideline - Because conservation and community environments are addressed through the City's General Plan, these issues are generally addressed through General Plan consistency. The CEQA land use/planning issues are usually overshadowed by the urban land use compatibility issues, which are the central focus of the Planning Commission and the analysis of staff.

MINERAL RESOURCES: Whether a project would result in loss of availability or accessibility to important mineral resources.

City Guideline - The only projects in Beverly Hills that involve mineral resources are the oil drilling permits for the drill site at the High School and drill sites around the community. These projects actually provide accessibility to mineral resources, and the central issues have been air quality, noise, and subsidence, addressed in the other topic areas.

NOISE: Whether a project would expose people to loud noise, significantly increase ambient noise levels, and/or cause excessive airport noise.

City Guideline - The EIRs utilize OPR's General Plan Guidelines as the standard for acceptable/unacceptable noise levels, and the City's Noise Ordinance for machinery noise and construction.

PARKING: While it has long been a convention of public agencies to assess a project's effects on parking resources in their environmental documentation, the State CEQA Guidelines no longer includes parking among the environmental issues that need to be addressed, based on a 2002 court case.¹ That notwithstanding, the City is not precluded from evaluating parking impacts in its CEQA documentation, which continues to be a consideration in land use compatibility. In simplest terms, the threshold of significance for parking impacts in Beverly Hills has been whether a project's parking is physically and operationally adequate to meet a project's parking demand. However, the analysis of parking impact has been growing ever more elaborate, with considerations for such issues as differing peaks among uses and market forces on parking behavior. Beverly Hills usually utilizes the empirical rates published by the Institute of Transportation Engineers (ITE), and special peer facility observations where a project is anticipated to have unique types of activities (e.g. the Annenberg Center).

POPULATION / HOUSING: Whether a project would displace people and/or housing, or induce population growth.

City Guideline - EIRs evaluate anticipated employment as well as any net changes in housing stock and weigh the effect on the overall housing stock. However, specific threshold has not been used.

PUBLIC SERVICES: Whether a project would result in the need for development/expansion of facilities for emergency, educational, recreational, or other public services.

City Guideline - The general threshold for public services is whether physical development or

¹ *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656. The holding essentially considers effects on parking resources to be a social impact rather than a physical impact, though with potential secondary physical impacts. If there is evidence of potential secondary physical impacts, such as increased traffic as motorists circle through neighborhoods to find parking, those potential physical impacts must be analyzed.

ATTACHEMENT 1
CEQA Study Areas

expansion of facilities are needed as a result. However; it is rare that a single project requires expanded facilities and a project's incremental effect is often not captured.

RECREATION: Whether a project would increase use and demands on existing recreational facilities, or result in development of recreational facilities that could affect the environment. City Guideline - Increases in recreation demand is generally associated with 1) increases in residential development, and 2) increases in employment. As with the Population/Housing topic issue, project demand is typically gauged against overall community demand and a consistent threshold has not been applied.

UTILITIES / SERVICE SYSTEMS: Whether a project would require improvements to the wastewater system, storm drain system, water supply, and/or solid waste disposal. City Guideline - This is handled similarly to the public services analysis. In most cases, the project's increment relative to the community as a whole is small. Wastewater has handled through the City's system model, and a project's impact can approach significant levels in some segments of the City's sewer system.

* Transportation / Traffic study area is discussed in the staff report and not included in the above list.

Attachment 2

Comparison of Traffic Thresholds Among Other Cities

TRANSPORTATION DIVISION
SIGNIFICANT BUFFER THRESHOLD
COMPARISON MATRIX

THRESHOLD

Signalized Intersection	Beverly Hills	Culver City	Los Angeles	Pasadena	Santa Monica*	West Hollywood*
LOS "D" (0.81-0.90)	4% or more increase in V/C	4% or more increase in V/C	2% or more increase in V/C	3% or more increase in V/C	Average delay by any amount for collector, or 15 seconds or more for arterial, or becomes LOS E or F	12 seconds or more delay
LOS "E" (0.91-1.00)	2% or more increase in V/C	2% or more increase in V/C	1% or more increase in V/C	2% or more increase in V/C	Average delay increases by any amount	12 seconds or more delay
LOS "F" (over 1.00)	2% or more increase in V/C	2% or more increase in V/C	1% or more increase in V/C	2% or more increase in V/C	Half Percent (0.005) increase in vehicles	8 seconds or more delay

Residential (local street)	Beverly Hills	Culver City	Los Angeles	Pasadena	Santa Monica	West Hollywood
0 - 3,750 ADT: 25% increase in ADT and/or 25% peak hour increase	0 - 98 ADT: 120 or more trips	0-1,000 ADT: 120 trips or more	0-2,000 ADT: 2.4% (staff review)	0-2,000 ADT: 2.5% (study required if count greater than 2K; plus soft mitigation)	1 - 1,250 ADT: 25% or more increase	0-2,000 ADT: 12% or more increase
3,750 - 6,750 ADT: 12.5% increase in ADT and 12.5% peak hour increase	1,000 - 1,999 ADT: 12% or more increase of final ADT	ADT 1,000-2,000: 12% or more increase	2,000+ ADT: 2.5%-4.8% (study required if count greater than 2K; plus soft mitigation)	2,000+ ADT: 5.0-7.4% (study if +2K; soft mitigation; physical mitigation may be required)	1,250 - 2,250 ADT: 12.5% or more increase	2,001-3,000 ADT: 10% or more increase
6,750+ ADT: 6.25% increase in ADT and 6.25% peak hour increase	2,000 - 2,999 ADT: 10% or more increase of final ADT	ADT 2,000 or more: 10% or more increase	2,000+ ADT: 7.5% and more (initial study +2K; soft mitigation; extensive physical mitigation may be required; project alternatives may be considered)	2,250 or more ADT: net increase of 1 trip	3,001-6,749 ADT: 8% or more increase	3,001-6,749 ADT: 8% or more increase
	3,000+ ADT: 8% or more increase of final ADT	ADT 3,000 or more: 8% or more increase				6,750+ ADT: 6.25% or more increase

* Santa Monica and West Hollywood measure seconds of delay

LOS: Level of Service
ADT: Average Daily Traffic
V/C: Volume to Capacity Ratio

TRANSPORTATION DIVISION
SIGNIFICANT TRAFFIC THRESHOLDS
COMPARISON MATRIX

THRESHOLD

Unsignalized (All Way Stop)	Beverly Hills	Santa Monica	West Hollywood
LOS "D" (0.81-0.90)	4.0 seconds or more delay	15 seconds or more delay	8 seconds or more delay
LOS "E" (0.91-1.00)	3.0 seconds or more delay	0 seconds or more delay	5 seconds or more delay
LOS "F" (over 1.00)	3.0 seconds or more delay	0 seconds or more delay	5 seconds or more delay

* The Cities of Culver City, Los Angeles, and Pasadena do not have specified measurements for unsignalized intersections.

Unsignalized (2-Way Stop)	Beverly Hills	Santa Monica	West Hollywood
A change in level of service from LOS "D" or better in any direction of travel to LOS "E" or "F"	None	None	None

* The City of Beverly Hills has a Threshold of Significance at unsignalized 2-way stops; no other city surveyed.

LOS: Level of Service
ADT: Average Daily Traffic
V/C: Volume to Capacity Ratio

Attachment 3

Traffic impact level of service comparison

ATTACHMENT 3

LOCAL JURISDICTION

LEVEL OF SERVICE THRESHOLDS

Jurisdiction	LEVEL OF SERVICE					
	A	B	C	D	E	F
Beverly Hills				0.04	0.02	0.02
Culver City				0.04	0.02	0.02
City of Los Angeles			0.04	0.02	0.01	0.01
County of Los Angeles			0.04	0.02	0.01	0.01
Santa Monica	Measures seconds of delay					0.005
West Hollywood	Measures seconds of delay					
Pasadena	0.06	0.05	0.04	0.03	0.02	0.01
Glendale				0.02	0.02	0.02
Hawthorne			0.04	0.02	0.01	0.01
El Segundo	D to E or F				0.02	0.02
Torrance					0.02	0.02
Redondo Beach	A, B, C or D to E or F				0.02	0.02
Malibu				0.02	0.02	0.02
Long Beach					0.02	0.02

Attachment 4

Descriptions of Levels of Service
from
The Highway Capacity Manual

Table 1 – Level of Service Interpretation at Signalized Intersections

Level of Service	Description	Volume to Capacity Ratio
A	Excellent operation. All approaches to the intersection appear quite open, turning movements are easily made, and nearly all drivers find freedom of operation.	0-0.60
B	Very good operation. Many drivers begin to feel somewhat restricted within platoons of vehicles. This represents stable flow. An approach to an intersection may occasionally be fully utilized and traffic queues start to form.	0.61-0.70
C	Good operation. Occasionally drivers may have to wait more than 60 seconds, and back-ups may develop behind turning vehicles. Most drivers feel somewhat restricted.	0.71-0.80
D	Fair operation. Cars are sometimes required to wait more than 60 seconds during short peaks. There are no long-standing traffic queues. <u>This level is typically associated with design practice for peak periods.</u>	0.81-0.90
E	Poor operation. Some long-standing vehicular queues develop on critical approaches to intersections. Delays may be up to several minutes.	0.91-1.00
F	Forced flow. Represents jammed conditions. Backups form locations downstream or on the cross street may restrict or prevent movement of vehicles out of the intersection approach lanes; therefore, volumes carried are not predictable. Potential for stop and go type traffic flow.	Over 1.00

Highway Capacity Manual, Special Report 209, Transportation Research Board, Washington, D.C and Interim Materials on Highway Capacity, NCHRP Circular 212.

Attachment 5

2005 Report to City Council on Neighborhood Traffic Thresholds of Significance



CITY OF BEVERLY HILLS
STAFF REPORT

Meeting Date: May 17, 2005
To: Honorable Mayor & City Council
From: Larry Sakurai, Environmental Project Manager
Subject: Discussion of Traffic Thresholds of Significance
Attachment: 1998 Traffic Thresholds (Currently in Use)

INTRODUCTION

This memorandum is intended to address concerns raised during previous public hearings on projects of the validity of a criterion for determining when a project's traffic is a significant impact to a neighborhood. In one alternative considered in the EIR, the Beverly Hills Gardens/Montage Hotel project was projected to add 12 trips to Beverly Drive north of Santa Monica Boulevard (an increase from 1,180 trips to 1,192) and was deemed to be a significant traffic impact, though its effect on the neighborhood would be imperceptible. This determination was made because the level of significance was based on comparing project traffic to an obscure level of "local" trips rather than the clearly visible level of street traffic that makes a difference to the character of the neighborhood. Staff suggests that the criterion be changed to more accurately gauge the effect of added traffic to a residential area.

DISCUSSION

The California Environmental Quality Act (CEQA) requires California public agencies, such as the City of Beverly Hills, to consider the implications of their actions on the environment. Where their actions may cause significant impacts to the environment, public agencies are encouraged to mitigate those impacts. In evaluating the severity of impacts, public agencies typically apply what are known as "thresholds of significance" to identify when an impact is significant and warrants mitigation.

The traffic thresholds currently in use were established in 1998. They were tangentially developed in connection with the effort by the Westside Cities to develop a uniform set of traffic thresholds for the sub region. Some thresholds, notably those evaluating signalized intersection impacts, have been applied for more than 20 years. Prior to 1998 however, the City did not have its own set of thresholds to evaluate residential neighborhood streets.

Meeting Date: January 10, 2005

Unlike the other traffic thresholds, thresholds of significance for neighborhood streets are actually not evaluating how well the traffic flows. Rather, they are intended to evaluate how a project's traffic might affect the existing character of a residential neighborhood. To evaluate neighborhood traffic impacts, counts of the existing traffic on a neighborhood street are collected. Then the proposed project's traffic is added to the subject street. To determine whether that project's traffic represents a significant impact to the neighborhood, the follow criteria are applied:

<u>Daily Volume without Project</u>	<u>Increase*</u>
≤ 3,750	25%
3,751–6,750	12.5%
>6,750	**

* Applies to both daily volume and peak hour volume.

** Identify local-oriented traffic volume and apply the above criteria.

When a project increases the traffic by greater than the above criteria, it is deemed a significant impact. The first two criteria are measuring how much a project changes the traffic on a street. It is the third criterion that has been questioned, because it is not really gauging how a project's traffic is impacting the character of a neighborhood. Local traffic is traffic that has a destination or origin somewhere along that segment of the street. Most of the traffic on streets that have a volume greater than 6,750 per day is through traffic. This means that when a project's traffic is gauged against the small amount of local traffic on a street, its impact on the character of the neighborhood can be deemed as significant even though in reality its traffic would be entirely imperceptible to the neighborhood. For example, in the case of how the Beverly Hills Gardens/Montage Hotel project would impact Beverly Drive, in one minute, one would observe on average 19.7 cars today. With the project, one would observe on average 19.9 cars in that same minute (in other words, an additional car every five minutes); not a perceptible change, but identified as a significant impact.

To make the third criterion consistent with the other two, it is suggested that the "local traffic" measurement be replaced with a 6.25%^{*} increase criterion. As with the other traffic thresholds, the tolerance for traffic increases becomes tighter as the volume of traffic gets greater, in recognition that the environment tolerates less and less impact as conditions approach undesirable levels.

It should be noted that the above criteria are to be applied to local streets as defined in the California Vehicle Code. Local streets have the following characteristics:

- The street is the primary access to abutting residential properties
- The roadway width (curb-to-curb) is not more than 40 feet
- The street has not more than one-half mile of uninterrupted length.
- The street has not more than one traffic lane in each direction.

* Each interval is progressively halved.

Meeting Date: January 10, 2005

The second characteristic essentially separates the local streets from more traveled residential streets, such as Burton Way or Olympic Boulevard. Streets north of the Business Triangle also tend to have vehicular right-of-way greater than 40 feet.

FISCAL IMPACT

None.

RECOMMENDATION

It is recommended that the threshold of significance for traffic impacts on neighborhood streets be amended to more consistently evaluate the effect of traffic on residential character as suggested above. If the City Council agrees with the suggestion, staff would provide a more comprehensive proposal to the City Council at a later date for consideration after it has undergone a public review process.

Mahdi Aluzri

Approved By

Meeting Date: January 10, 2005

EXISTING THRESHOLDS

CITY OF BEVERLY HILLS

PUBLIC WORKS DEPARTMENT-ENGINEERING DIVISION

INTEROFFICE COMMUNICATION

FEBRUARY 9, 1998

TO: Audrey Arlington, Senior Planner

FROM: *BV* Bijan Vaziri, Associate Transportation Engineer

SUBJECT: Recommended Threshold of "Significant Impact" on Traffic Generated by New Developments- Revised

The following is the revised recommended threshold of significant impacts based on discussions at the Planning Department staff meetings during November and December of 1997. Please advise if more discussions are needed.

Calculation Methodology: Intersection Capacity Utilization (ICU), using criterion similar to CMP.

Calculation Methodology: Intersection Capacity Utilization (ICU), using criterion similar to CMP.

An impact will be considered significant if a project related traffic causes an increase of:

- 0.020 or more on V/C at the final LOS "F"
- 0.020 or more on V/C at the final LOS "E"
- 0.040 or more on V/c at the final LOS "D"

Calculation Methodology: The 1994 Highway Capacity manual

Calculation Methodology: The 1994 Highway Capacity manual

An impact will be considered significant if the following increase of average total delay per vehicle is resulted:

Meeting Date: January 10, 2005

EXISTING THRESHOLDS

- 3.0 seconds or more average total delay at the final LOS "F"
- 3.0 seconds or more average total delay at the final LOS "E"
- 4.0 seconds or more average total delay at the final LOS "D"

Thresholds of LOS

Calculation methodology: Highway Capacity Manual, special report 209, or comparable software.

Significant Impact: A Change in LOS to LOS E OR F from LOS D or better that occurs on any direction of travel.

Definition of a local street

Definition of a local street (per state of California Vehicle Code section 40802-b):

- 1- The street is a primary access to abutting residential properties.
- 2- Roadway width of not more than 40 feet.
- 3- Not more than one-half mile of uninterrupted length.
- 4- Not more than one traffic lane in each direction.

Significant Impact:

I- ADT less than 3,750, project increases ADT by 25% and/or increases of the peak hour by 25%.

II- ADT greater than 3,750 but less than 6750, project increases ADT by 12.5% and/or increases the peak hour by 12.5%.

III- ADT greater than 6,750, requires the following additional analysis:

- a) Identify the volume of the cut through traffic by conducting license plate survey or any other feasible methods.

Meeting Date: January 10, 2005

EXISTING THRESHOLDS

- b) Identify the volume of the local traffic by subtracting the volume of cut through from the total ADT.
- c) Apply the result to either case I or II situations.

02/09/98 10:53 AM pimact