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.

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.

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[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.

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

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.

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	Transportation
Housing Element	Santa Monica Boulevard Signals
Medical Office Use Zoning	Metro Subway EIR and Actions
Commercial CID Standards	Taxi Franchising
Trousdale/Hillside View Preservation	Lexus Traffic Study
Expansion of Design Review to Hillside Area	Street Sign Program
General Plan Implementation/ Zoning Code Update	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

ATTCHMENT 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.

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.[f] 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

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[f] *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.

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 TRAFFIC THRESHOLDS
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 - 99 ADT: 120 or more trips	0-1,000 ADT: 120 trips or more	0-2,000 ADT: 2.4% (staff review)	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%-4.9% (study required if count greater than 2K; plus soft mitigation)	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: 5.0-7.4% (study if +2K; soft mitigation; physical mitigation may be required)	2,250 or more ADT: net increase of 1 trip	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	2,000+ ADT: 7.5% and more (initial study +2K; soft mitigation; extensive physical mitigation may be required; project alternatives may be considered)		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

* 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

	LEVEL OF SERVICE					
Jurisdiction	**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. This level is typically associated with design practice for peak periods.	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.

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:

Daily Volume without Project	Increase*
≤ 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.

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* Each interval is progressively halved.

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.

Threshold for Impacts at Signalized Intersections:

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"

Threshold for Impacts at unsignalized all-way stop intersections:

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:

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"

Threshold of Impacts at unsignalized (2-way stop) intersections:

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 occures on any direction of travel.

Threshold of Impacts at residential(local streets):

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.

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 pimpact