

## Following Suit – City of Los Angeles Updates CEQA Guide to Include VMT Methodology Ahead of State-Imposed Deadline

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On July 30, 2019, the Los Angeles City Council unanimously approved an update to the [“Transportation” section of the City’s California Environmental Quality Act \(“CEQA”\) Threshold Guide](#). City Council’s action has effectively updated the framework for evaluating traffic impact analysis to a vehicle miles traveled (“VMT”) metric in accordance with updated CEQA Guidelines section 15064.3 and Senate Bill 743. Per the City’s Planning Department, by shifting to a VMT-centric analysis, the City will be better positioned to assess potential impacts on the City’s transportation system, as well as meet its climate change goals. Interestingly, while the City Council action is complete, there is still a bit of confusion at the City as to how the VMT metric will, in practice, be phased in for projects already in the planning process.

As amended, the CEQA Threshold Guide permits any project that, at the time of the vote, obtained an approved memorandum of understanding (“MOU”) from the Los Angeles Department of Transportation (“LADOT”) to be allowed to continue to utilize the level of service (“LOS”) metric historically accepted as CEQA-compliant methodology. These projects will also be able to submit data from either a VMT or LOS traffic analysis. However, City Planning has advised some applicants that even if an MOU was not approved prior to Tuesday’s vote, there will still be some flexibility in the short-term, and projects will be looked at on a case-by-case basis to determine applicability of the new metric. For example, in some instances, LADOT may only require the VMT analysis as a supplemental appendix to an already existing LOS analysis. However, projects that have not commenced with either their planning application or MOU approval will be subject to the new VMT analysis.

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National Law Review, Volume IX, Number 219

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