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Identifying Baseline Conditions under CEQA — Back to the Future?

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If you grew up in the 1980s as I did, you are intimately familiar with the movie *Back to the Future*, the highest grossing film of 1985. In the film, Marty McFly (played by Michael J. Fox) is sent back in time via a plutonium-fueled time machine made out of a DeLorean to 1955, where he meets his future parents in high school and accidentally becomes his mother's romantic interest. McFly then sets out to repair the damage to history (and preserve his future existence) by coaxing his parents-to-be to fall in love and find a way to return back to 1985.

Many planners analyzing a project's potential impacts are themselves tempted to go 'back to the future' by using past or even future baseline conditions as the starting point, or baseline, for impact analysis. Pursuant to recent decisions by the California Supreme Court and Fourth District Court of Appeal in *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439 and *North County Advocates v. City of Carlsbad* (2015) 241 Cal.App.4th 94, doing just that is permitted in certain situations. Before delving into the key facts and decisions in the *Neighbors for Smart Rail* and *North County Advocates* cases however, a quick CEQA primer and summary of relevant court decisions is in order.

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