AGENDA ITEM

WRITTEN COMMUNICATIONS

CITY COUNCIL

MEETING OF: JUNE 16, 2020

SUBMITTED BY: SCOTT WEBB
CITY PLANNER

DATE: 06/03/20

ATTACHMENTS:
A) RESOLUTION NO. 20-031
B) BACKGROUND INFORMATION FROM THE MAY 27, 2020 PLANNING COMMISSION WORKSHOP

SUBJECT: ADOPTING LOCAL GUIDELINES FOR VEHICLE MILES TRAVELED (VMT) THRESHOLDS OF SIGNIFICANCE FOR PURPOSES OF ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

RECOMMENDATION:
1) Find that the adoption of VMT thresholds are exempt under Section 15378(b)(5) of the California Environmental Quality Act (CEQA) Guidelines; and
2) Adopt Resolution No. 20-031 approving local guidelines for Vehicle Miles Traveled (VMT) thresholds of significance for purposes of analyzing transportation impacts.

FISCAL IMPACT:
No fiscal impact

DISCUSSION:
The Planning Commission, after conducting a public workshop, recommended City Council approval of local guidelines for Vehicle Miles Traveled (VMT) thresholds of significance at their May 27, 2020 special meeting, by a vote of 5-0.

Effective July 1, 2020, VMT will replace Level of Service (LOS) traffic analysis under the California Environmental Quality Act (CEQA) as a result of the passage of Senate Bill SB743. LOS rates the level of traffic congestion by grades (A-F). VMT however, measures the total amount of weekday miles driven from home and to work, shopping and back home again. Since VMT is a new method in analyzing transportation impacts, staff has been working with the San Bernardino County Transportation Authority (SBCTA) and traffic consultants Fehr and Peers and Translations, Inc. to update the City’s method to analyze traffic impacts. The proposed
CEQA traffic methodology developed through that process includes guidelines for VMT thresholds specific to Victorville, which are supported by sufficient evidence as documented in the Planning Commission Staff Report (Attachment B) and listed within Exhibit 1 of Resolution No. 20-031 (Attachment A). If the City does not adopt local CEQA Guidelines for VMT thresholds of significance by July 1, 2020, the City will automatically be subject to more stringent Statewide VMT Guidelines as noted in the Planning Commission Staff Report (Attachment B). Staff has communicated with representatives from the commercial and residential building industries throughout this public review process and both industries are supportive of the proposed local VMT guidelines. Therefore, on behalf of the Planning Commission, staff recommends that the City Council adopt local VMT guidelines by approving Resolution No. 20-031 (Attachment A).

SW/ms

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<th>FINANCE USE ONLY</th>
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<tbody>
<tr>
<td>Additional Appropriation:</td>
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<td>Finance Analyst:</td>
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<tr>
<td>Yes ☐ $_________</td>
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RESOLUTION NO. 20-010

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF VICTORVILLE
CITY COUNCIL ADOPTING LOCAL GUIDELINES FOR VEHICLE MILES
TRAVELED (VMT) THRESHOLDS OF SIGNIFICANCE FOR PURPOSES OF
ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA
ENVIRONMENTAL QUALITY ACT (CEQA)

WHEREAS, a public hearing was held by the Planning Commission on the 27th day of May, 2020, pursuant to Title 7, Division 1, Chapter 4, of the California Government Code, to hear arguments for and against the proposal and at the close of the public hearing the item was recommended for City Council approval by a unanimous vote of the Planning Commission with the adoption of Resolution No. P-20-010; and

WHEREAS, the Planning Commission recommended that the City Council find that the attached Resolution is not a project under Section 15378(b)(5) of the California Environmental Quality Act (CEQA) Guidelines because it involves an administrative activity involving process only and would not result in any direct or indirect physical changes to the environment; and

WHEREAS, a Public Hearing was duly held before the City Council of the City of Victorville on the 16th day of June, 2020, pursuant to Title 7, Division 1, Chapter 4, of the California Government Code and Section 16.2.05.060 of the Victorville Municipal Code for the purpose of taking public input relative to the proposal; and

WHEREAS, the City Council finds that all materials that constitute the record of proceedings upon which its decision is based, shall be located with the City of Victorville Clerk, located at 14343 Civic Drive, Victorville, CA; and

WHEREAS, the California Environmental Quality Act Guidelines ("CEQA Guidelines") encourage public agencies to develop and publish generally applicable "thresholds of significance" to be used in determining the significance of a project's environmental effects; and

WHEREAS, CEQA Guidelines section 15064.7(a) defines a threshold of significance as "an identifiable quantitative, qualitative or performance level of a particular environmental effect, noncompliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant"; and

WHEREAS, CEQA Guidelines section 15064.7(b) requires that thresholds of significance must be adopted by ordinance, resolution, rule, or regulations, developed through a public review process, and be supported by substantial evidence; and

WHEREAS, pursuant to CEQA Guidelines section 15064.7(c), when adopting thresholds of significance, a public agency may consider thresholds of significance adopted or recommended by other public agencies provided that the decision of the agency is supported by substantial evidence; and

WHEREAS, Senate Bill 743, enacted in 2013 and codified in Public Resources Code section 21099, required changes to the CEQA Guidelines regarding the criteria for determining the significance of transportation impacts of projects; and

WHEREAS, in 2018, the Governor's Office of Planning and Research ("OPR") proposed, and the California Natural Resources Agency certified and adopted, new CEQA Guidelines...
section 15064.3 that identifies vehicle miles traveled ("VMT") – meaning the amount and distance of automobile travel attributable to a project – as the most appropriate metric to evaluate a project’s transportation impacts; and

WHEREAS, as a result, automobile delay, as measured by “level of service” ("LOS") and other similar metrics, will generally no longer constitute a significant environmental effect under CEQA; and

WHEREAS, CEQA Guidelines section 15064.3 requires agencies to stop treating automobile delay/LOS as an environmental impact effective on July 1, 2020; and

WHEREAS, the City of Victorville, through the public review process consisting of Staff presentations before a Planning Commission workshop and a City Council meeting, wishes to adopt the VMT thresholds of significance for determining the significance of transportation impacts that are recommended by experts in the field of traffic engineering and supported by substantial evidence: and

WHEREAS, the City Council of the City of Victorville, after hearing all testimony presented, based on substantial evidence in the record, adopts the Vehicle Miles Traveled (VMT) thresholds of significance as set forth in the Exhibit ‘1’ of this Resolution, as supported by substantial evidence.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF VICTORVILLE DOES HEREBY RESOLVE, DETERMINE AND ORDER AS FOLLOWS:

SECTION 1. That the Vehicle Miles Traveled (VMT) Analysis Guidelines contained within the attached Exhibit ‘1’ will be the official document in which transportation impacts for development projects will be analyzed under the California Environmental Quality Act (CEQA).

SECTION 2. This resolution shall become effective on July 1, 2020, unless an extension of the implementation date of Title 14 of the California Code of Regulations, Section 15064.3 is authorized by the State of California. In the event of said extension, this resolution shall become effective on the date the delayed implementation is no longer authorized.
Exhibit ‘1’
City of Victorville

Vehicle Miles Traveled (VMT) Analysis Guidelines

Project Screening Criteria
Projects that will not require a VMT analysis can be screened using either the daily vehicle trips generated by project or the project’s land use type.

Daily Vehicle Trip thresholds
The project results in a net increase of 1,285 or less weekday daily trips. The Institute of Transportation Engineers (ITE) Trip Generation Manual, latest edition will be used to estimate the daily trip generation. If the ITE Trip Generation Manual does not have studies specific to a land use, other trip generation traffic studies may be used.

Land Use Types
The following land use types will be used for screening.
• Single family or Multifamily Residential - 136 dwelling units or less
• Office – 227,000 square feet
• Retail – 122,000 square feet
• Warehousing – 829,000 square feet
• Light Industrial – 296,000 square feet
• K-12 Public School
• Daycare/Childcare/Pre-K
• Affordable housing
• Student Housing
• Community Institutions, Social Services and Public Buildings

Project Generated Methodology
Either the Production/Attraction (PA) or Origin/Destination (OD) methods can be used. For projects with a single land use type the PA method will be used. For projects with mixed land use types the OD method will be used.

Benchmark
The benchmark used will be the City Limits as the boundary.

Thresholds
Thresholds shall be consistent with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) future year VMT projections for the City’s General Plan buildout. A project’s VMT generation per service population shall be less than the City’s VMT General Plan buildout per service population. However, feasible mitigation measures may be identified to reduce the project VMT below the thresholds.
Level of Service Analysis (LOS)
LOS analysis thresholds identified in the City's General Plan and Traffic Impact Analysis guidelines will continue to be used to analyze traffic impacts, in addition to VMT impact analysis.

Model Used for VMT Analysis
The model used for VMT analysis will be the San Bernardino County Transportation Analysis Model (SBCTAM), maintained by the San Bernardino County Transportation Authority (SBCTA).
PLANNING COMMISSION MEETING
EXECUTIVE SUMMARY

Local CEQA Guidelines – PLAN20-00011

PROJECT DESCRIPTION: TO CONSIDER THE ADOPTION OF A PLANNING COMMISSION RESOLUTION TO RECOMMEND TO THE CITY COUNCIL OF THE CITY OF VICTORVILLE TO ADOPT CITYWIDE VEHICLE MILES TRAVELED IMPACT THRESHOLDS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

APPLICANT: City of Victorville

PLANNING COMMISSION PUBLIC HEARING DATE: May 27, 2020

SUMMARY FOR MAY 27, 2020 REGULAR PLANNING COMMISSION MEETING:

NUMBER OF PEOPLE WHO COMMENTED: 1
NUMBER OF PEOPLE SPEAKING IN FAVOR: 1
NUMBER OF PEOPLE SPEAKING OPPOSED: 0
NUMBER OF WRITTEN COMMENTS IN FAVOR: 0
NUMBER OF WRITTEN COMMENTS OPPOSED: 0

STAFF RECOMMENDATION: Approval

PLANNING COMMISSION ACTION: Recommend Approval

PLANNING COMMISSION VOTE:
Kurth Aye
Marsh Aye
Huber Aye
Wells Aye
Harriman Aye
rc
1. **PLAN20-00011 – VEHICLE MILES TRAVELED (VMT)**

Scott Webb presented the item to the Commission recommending approval as conditioned.

Senior Planner, Michael Szarzynski, introduced a PowerPoint presentation including a short video summarizing Vehicle Miles Traveled.

Chair Kurth opened the public hearing.

Bill Blankenship had a question regarding the process of adoption for the item and when the item will be presented to the Council. He also asked on the threshold would be used for warehouse buildings.

Chair Kurth closed the public hearing.

Vice Chair Marsh motioned to approve the item as conditioned.

Commissioner Wells seconded.

Motion carried by unanimous vote of the Commission to recommend to City Council for approval of the following:

**TO CONSIDER THE ADOPTION OF A PLANNING COMMISSION RESOLUTION TO RECOMMEND TO THE CITY COUNCIL OF THE CITY OF VICTORVILLE TO ADOPT CITYWIDE VEHICLE MILES TRAVELED IMPACT THRESHOLDS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**
PLANNING COMMISSION
STAFF REPORT

DATE: MAY 27, 2020
CASE: PLAN20-00011

SUBJECT: A WORKSHOP OF THE PLANNING COMMISSION OF THE CITY OF VICTORVILLE TO DISCUSS "VEHICLE MILES TRAVELED" (VMT) THRESHOLDS OF SIGNIFICANCE FOR PURPOSES OF ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AND POSSIBLE ACTION BY THE PLANNING COMMISSION TO APPROVE A RESOLUTION RECOMMENDING CITY COUNCIL ADOPTION OF VMT THRESHOLDS OF SIGNIFICANCE

APPLICANT: CITY OF VICTORVILLE - DEVELOPMENT DEPARTMENT
LOCATION: CITYWIDE

I. STAFF RECOMMENDATION:

Staff recommends that the Planning Commission conduct a public hearing, receive testimony regarding the proposal and take the following actions:

1. Environmental Assessment – Recommend that the City Council find the adoption of the attached Resolution is not a project under Section 15378(b)(5) of the California Environmental Quality Act (CEQA) because it involves an administrative activity involving process only and would not result in any direct or indirect physical changes to the environment; and

2. Code Amendment - Adopt Resolution No. P-20-010, recommending City Council approval of Case No. PLAN20-00011 adopting "Vehicle Miles Traveled" (VMT) thresholds of significance for purposes of analyzing transportation impacts under Sections 15064.3 of the California Environmental Quality Act.

II. SUMMARY:

Staff will be providing a power point presentation at the Planning Commission workshop to help the Commission understand the basics of VMT and the VMT process.

The California Environmental Quality Act (CEQA) is California’s most comprehensive environmental law. Generally, it requires public agencies to evaluate the environmental effects of a project before action is taken. CEQA also aims to prevent significant environmental effects from occurring as a result of agency actions by requiring agencies to avoid or reduce, when feasible, the significant environmental impacts of their decisions.

As a result of Senate Bill SB743, on December 28, 2018, the Office of Administrative Law approved a comprehensive update to the CEQA Guidelines which also included implementation metrics for Vehicle Miles Traveled (VMT) to replace Level of Service (LOS),
which rates and grades (A-F) for the level of traffic congestion. VMT however, measures the total amount of weekday miles driven from home and to work, shopping and back home again. Since VMT is a new method in analyzing transportation impacts, Staff has been working with the San Bernardino County Transportation Authority (SBCTA), traffic consultant Translations and traffic consultant Fehr and Peers to update the City’s method to analyze traffic impacts. The proposed CEQA traffic methodology developed through that process includes VMT thresholds specific to Victorville. Staff is proposing to adopt Vehicle Miles Traveled thresholds and include them as part of the local CEQA process per CEQA Guidelines Section 15064.3.

III. STAFF ANALYSIS:

1. Discussion.

**Vehicle Miles Traveled Thresholds**

As mentioned, VMT is the new metric for transportation analysis which focuses on the overall miles traveled by vehicles within a region, resulting in automobile delay (Level of Service - LOS) to be no longer used as criteria for determining a significant environmental effect under CEQA. This approach has an added inherent emphasis on reducing greenhouse gas emissions. All cities in the State of California are encouraged to adopt individual VMT thresholds through a public hearing process no later than July 1, 2020, otherwise the State Office of Planning and Research (OPR) VMT Guidance will become effective wholesale for the jurisdiction, including more restrictive VMT Thresholds for projects. Therefore, Fehr & Peers, assisted in review and development of methodology for project generated VMT thresholds for Victorville, and other San Bernardino County cities. Traffic consultant Translations, Inc. assisted in developing land use and trip based thresholds.

CEQA Guidelines Section 15064.7(c) allows a Lead Agency to consider Thresholds of Significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the Lead Agency to adopt such thresholds is supported by substantial evidence. Therefore, the City of Victorville is not required to adhere to OPR’s recommendations and can set its own thresholds that are supported by substantial evidence.

City Staff participated in a collaborative study led by SBCTA which evaluated the tools, thresholds, and mitigation options appropriate for the San Bernardino County region. Staff attended several workshops in 2019 and 2020 on Vehicle Miles Traveled. VMT thresholds for Victorville have been proposed to be adopted as the method to analyze CEQA transportation impacts. Those thresholds are all consistent with OPR guidance, with two exceptions backed by substantial evidence, including:

- VMT project generation equal to or better than the General Plan future buildout for Low VMT areas, whereas OPR guidance suggests 15% below existing conditions. This threshold is VMT Threshold Option #3 of four SBCTA options developed by Fehr and Peers (See Attachment ’C’); and

- Projects by land use type or other projects that generate less than 1,283 daily vehicle trips (See the VMT screening process below), whereas OPR guidance suggests 110 trips.
As a result, automobile delay, as measured by LOS, generally no longer constitutes a significant environmental effect under CEQA. Adopting VMT thresholds however, does not preclude the City from using LOS analysis to comply with Congestion Management Plan requirements or to conduct a project specific transportation analysis.

The VMT Thresholds will become effective upon adoption by the City Council. New projects or projects that have not circulated CEQA documents for public review before the effective date must comply with the City’s new CEQA Guidelines.

**Vehicle Miles Traveled Screening Process**

There are three types of screening of a proposed project, which are demonstrated by substantial evidence (CEQA Guidelines Section 15064). A proposed project would not be required to prepare an independent VMT Analysis if exempted by one or more of the following screening methods.

- **Transit Priority Area (TPA) Screening** - With exceptions, projects located within one half mile of a TPA may be presumed to have a less than significant impact. Victorville does not have any TPA’s as defined by PRC 21064.3 – Major Transit Stops within HOTA’s, therefore this screening method will not be utilized.

- **Low VMT Area Screening** – Developed with the San Bernardino County Traffic Analysis Model (SBTAM), the travel forecasting model for individual Traffic Analysis Zones (TAZ), total daily VMT (Baseline VMT levels) per service population (population + employment) was estimated for each jurisdictions TAZ. Developers for proposed residential and office projects can utilize a screening tool to identify if the project is within a low VMT-generating area and therefore be exempt. If Victorville adopts the VMT threshold mentioned above (VMT project generation equal to or better than the General Plan future buildout) it will not only be less restrictive than OPR technical advice, but will allow for a greater number of exempt projects because of addition exempt low VMT areas (See Attachment ‘B’). However, proposed projects must be consistent with existing land use and not increase the rate or length of existing trips. This methodology is based the Implementation Study (within Attachment ‘C’) conducted for SBCTA.

- **Daily Trip and Land Use Type Screening** – In this category, OPR set the recommended threshold at 110 daily trips based on the daily traffic count of a 10,000 square foot office building, which is an existing CEQA categorical exemption. The Technical Advisory states, “CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).)” However, OPR’s criteria for selecting this categorical exemption as a threshold is
arbitrary and is not supported by a correlation in greenhouse gas emissions (GHG) reduction.

Based on the intent and goals of SB-743 to promote the reduction in greenhouse gas emissions, staff is recommending the City base their thresholds from a GHG emissions perspective. Transolutions, Inc. provides justification of daily trip and land use type thresholds based on the thresholds the governing Air Quality Management Districts use to determine if a project is will have a significant impact based on the Metric Tons of CO2 Equivalents per year a project would product. Attachment D provided substantial evidence that allows the City to establish realistic thresholds with a nexus to GHG reduction.

To summarize Transolutions, Inc. evaluation, the following unit counts are anticipated to have less than significant impacts:

- Single Family Residential – 136 Dwelling Units
- Multi-Family (Low Rise) Residential – 136 Dwelling Units
- Office – 227,000 square feet
- Retail – 122,000 square feet
- Warehousing – 829,000 square feet
- Light Industrial – 296,000 square feet
- For land uses not included described above, the project would have a threshold of 1,285 daily weekday trips

Staff has included additional land use project types that are allowed to be screened from doing a VMT analysis, as authorized by OPR, such as affordable housing, student housing and K-12 public schools.

Projects that cannot be screened will be required to prepare an independent VMT Analysis through the SBTAM model prior to the formal submittal of a project. If VMT thresholds are exceeded, changes to the project or mitigation to the project must be done to reduce the level to less than significant. Some possible changes and mitigation are shown below.

- Modify the projects built environment characteristics to reduce the VMT generated by the project. For instance, a residential tract development could reduce the number of houses (density) or add a market, and/or a church and/or a park (add land diversity) to capture trips.

- Implement Transportation Demand Management (TDM) measures to reduce VMT generated by the project. TDM measures rely on strategies to reduce vehicle travel through incentives and disincentives. For instance, mixing of land uses within a development.

- Participate in a VMT impact fee program with a nexus to VMT reduction that would use fees for transit, bicycle or pedestrian improvements that reduce VMT.
- Participate in a VMT mitigation bank/exchange program that matches VMT generators with reducers within or outside jurisdiction boundaries to reduce VMT generated by the project.

MJS/SW

Attachments:
Attachment A – Resolution No. P-20-010 and Vehicle Miles Traveled (VMT) Analysis Guidelines
Attachment B – Screenshots of SBCTA VMT Threshold Options from Screening Tool
Attachment C – Various SBCTA VMT Reports from Fehr and Peers
Attachment D – Translution, INC, Memorandum Dated May 21, 2020
ATTACHMENT ‘A’
RESOLUTION NO. P-20-010

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF VICTORVILLE RECOMMENDING TO THE CITY COUNCIL THE ADOPTION OF "VEHICLE MILES TRAVELED" THRESHOLDS OF SIGNIFICANCE FOR PURPOSES OF ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

WHEREAS, a public hearing was held on the 27th day of May 2020, pursuant to Title 7, Division 1, Chapter 4, of the Government Code, State of California, to hear arguments for and against the issue; and

WHEREAS, the Planning Commission finds that all materials that constitute the record of proceedings upon which its decision is based, shall be located with the City of Victorville Clerk, located at 14343 Civic Drive, Victorville, CA; and

WHEREAS, the California Environmental Quality Act Guidelines ("CEQA Guidelines") encourage public agencies to develop and publish generally applicable "thresholds of significance" to be used in determining the significance of a project's environmental effects; and

WHEREAS, CEQA Guidelines section 15064.7(a) defines a threshold of significance as "an identifiable quantitative, qualitative or performance level of a particular environmental effect, noncompliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant"; and

WHEREAS, CEQA Guidelines section 15064.7(b) requires that thresholds of significance must be adopted by ordinance, resolution, rule, or regulations, developed through a public review process, and be supported by substantial evidence; and

WHEREAS, pursuant to CEQA Guidelines section 15064.7(c), when adopting thresholds of significance, a public agency may consider thresholds of significance adopted or recommended by other public agencies provided that the decision of the agency is supported by substantial evidence; and
WHEREAS, the City of Victorville Planning Commission recommends adoption of the Vehicle Miles Traveled (VMT) thresholds of significance as set forth in the Exhibit 1 of this resolution, as supported by substantial evidence; and

WHEREAS, Senate Bill 743, enacted in 2013 and codified in Public Resources Code section 21099, required changes to the CEQA Guidelines regarding the criteria for determining the significance of transportation impacts of projects; and

WHEREAS, in 2018, the Governor’s Office of Planning and Research (“OPR”) proposed, and the California Natural Resources Agency certified and adopted, new CEQA Guidelines section 15064.3 that identifies vehicle miles traveled (“VMT”) – meaning the amount and distance of automobile travel attributable to a project – as the most appropriate metric to evaluate a project’s transportation impacts; and

WHEREAS, as a result, automobile delay, as measured by “level of service” (“LOS”) and other similar metrics, will generally no longer constitute a significant environmental effect under CEQA; and

WHEREAS, CEQA Guidelines section 15064.3 requires agencies to stop treating automobile delay/LOS as an environmental impact effective on July 1, 2020, though public agencies may elect to be governed by this section immediately; and

WHEREAS, the City of Victorville, through this public review process consisting of Staff presentations before the Planning Commission workshop, wishes to adopt the VMT thresholds of significance for determining the significance of transportation impacts that are recommended by experts in the field of traffic engineering and supported by substantial evidence.

NOW, THEREFORE, BE IT RESOLVED by the Planning Commission, pursuant to Chapter 2.12.090 of the Victorville Municipal Code, that it recommends to the City Council of the City of Victorville approval of Case No. PLAN20-00011, the adoption of “Vehicle Miles Traveled”
thresholds of significance, as described in Exhibit '1', for purposes of analyzing transportation impacts under the California Environmental Quality Act.

PASSED, APPROVED AND ADOPTED this 27th day of May, 2020.

__________________________
ROB KURTH, CHAIRMAN
VICTORVILLE PLANNING COMMISSION

ATTEST:

__________________________
SCOTT WEBB,
PLANNING COMMISSION SECRETARY
Exhibit ‘1’
City of Victorville

Vehicle Miles Traveled (VMT) Analysis Guidelines

Project Screening Criteria
Projects that will not require a VMT analysis can be screened using either the daily vehicle trips generated by project or the project’s land use type.

Daily Vehicle Trip thresholds
The project results in a net increase of 1,285 or less weekday daily trips. The Institute of Transportation Engineers (ITE) Trip Generation Manual, latest edition will be used to estimate the daily trip generation. If the ITE Trip Generation Manual does not have studies specific to a land use, other trip generation traffic studies may be used.

Land Use Types
The following land use types will be used for screening.
- Single family or Multifamily Residential - 136 dwelling units or less
- Office – 227,000 square feet
- Retail – 122,000 square feet
- Warehousing – 829,000 square feet
- Light Industrial – 296,000 square feet
- K-12 Public School
- Daycare/Childcare/Pre-K
- Affordable housing
- Student Housing
- Community Institutions, Social Services and Public Buildings

Project Generated Methodology
Either the Production/Attraction (PA) or Origin/Destination (OD) methods can be used. For projects with a single land use type the PA method will be used. For projects with mixed land use types the OD method will be used.

Benchmark
The benchmark used will be the City Limits as the boundary.

Thresholds
Thresholds shall be consistent with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) future year VMT projections for the City’s General Plan buildout. A project’s VMT generation per service population shall be less than the City’s VMT General Plan buildout per service population. However, feasible mitigation measures may be identified to reduce the project VMT below the thresholds.
Level of Service Analysis (LOS)
LOS analysis thresholds identified in the City's General Plan and Traffic Impact Analysis guidelines will continue to be used to analyze traffic impacts, in addition to VMT impact analysis.

Model Used for VMT Analysis
The model used for VMT analysis will be the San Bernardino County Transportation Analysis Model (SBCTAM), maintained by the San Bernardino County Transportation Authority (SBCTA).
ATTACHMENT 'B'
0% Baseline at Existing Conditions Option #4 (Shaded TAZs include Low VMT exempt areas)

0% Baseline at GP Buildout Option #3 (Shaded TAZs include Low VMT exempt areas)
14.3% Baseline at Existing Option #2 (Shaded TAZs include Low VMT exempt areas)

15% Baseline at Existing Option #1 (Shaded TAZs include Low VMT exempt areas)
ATTACHMENT ‘C’
### SBCTA: City VMT Guidelines Decision Checklist

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<tr>
<th>Topic Area</th>
<th>Decision</th>
<th>Notes</th>
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<tr>
<td><strong>STEP 01</strong></td>
<td>Yes - Include &lt;br&gt; • How many trips per day? &lt;br&gt; • Instead of trip-based, VMT-based</td>
<td>OPR recommends a threshold of 10 daily trips for project screening. This is based on the number of trips generated by 10,000 sf of office space. As trips are only one component of VMT, this screening criteria should be carefully considered. Alternatively, a screening threshold based on VMT could be applied. Any land use types that are local serving in your community should be considered for this screening.</td>
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<td><strong>STEP 02</strong></td>
<td>No - Do not include</td>
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<td><strong>STEP 03</strong></td>
<td>Any changes (subtractions or additions) to current list: &lt;br&gt; • Local serving retail (50 ksf or less) &lt;br&gt; • K-12 Public School &lt;br&gt; • Daycare/Childcare/Pre-K &lt;br&gt; • Affordable housing &lt;br&gt; • Student Housing &lt;br&gt; • Community Institutions (Public Library, Fire station, Local Government)</td>
<td>PA method can isolate trip purpose and truck VMT, but does not account for trips with one trip end outside the model boundary. OD method cannot isolate trip purpose or truck VMT, but does include all trips including those with one end outside the model boundary. Both methods can be identified in the TIA guidelines, with the selection of method can be used based on if the project is of a single land use type (PA) or mixed use (OD). Each City must choose their appropriate boundary for a regional benchmark for all impacts.</td>
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<td><strong>STEP 04</strong></td>
<td>PA - Productions/Attractions</td>
<td>See SBCTA SB 743 Implementation Thresholds Assessment dated 11/1/19 for more information.</td>
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<td><strong>STEP 05</strong></td>
<td>OD - Origin/Destination</td>
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<td><strong>STEP 06</strong></td>
<td>Both - PA when single use and OD when mixed use</td>
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<td><strong>STEP 06</strong></td>
<td>OPTION 1 - Rely on the OPR Technical Advisory Thresholds (15% Below Existing)</td>
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<td><strong>STEP 06</strong></td>
<td>OPTION 2 - Set Thresholds Consistent with Lead Agency Air Quality, GHG Reduction, and Energy Conservation Goals (14.3% Below Existing)</td>
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<td><strong>STEP 06</strong></td>
<td>OPTION 3 - Set Thresholds Consistent with RTP/SCS Future Year VMT Projections by Jurisdiction or Sub-Region (Better than General Plan Buildout)</td>
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<td><strong>STEP 06</strong></td>
<td>OPTION 4 - Set Thresholds Based on Baseline VMT Performance (Better than Existing)</td>
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<tr>
<td><strong>STEP 06</strong></td>
<td>Include - intersection or roadway LOS analysis as part of the City’s TIA Guidelines, although this analysis would not be used to determine CEQA impacts</td>
<td></td>
</tr>
<tr>
<td><strong>STEP 06</strong></td>
<td>Do not include any LOS analysis in the City’s TIA Guidelines</td>
<td></td>
</tr>
</tbody>
</table>
FAQ

Evaluating Transportation Impacts in CEQA
Based on New Guidelines as Directed by SB 743

What was the legislative intent of SB 743 (2013)?

1. Balance the needs of congestion management with the following statewide goals:
   a. Reduction of greenhouse gas emissions
   b. Infill development
   c. Public health through active transportation
2. Ensure that the environmental impacts of traffic such as noise, air pollution, and safety concerns continue to be addressed and mitigated through CEQA

What does the new CEQA Section 15064.3 adopted by the state in December 2018 require?

1. A project’s effect on automobile delay (i.e., Level of Service) shall not constitute a significant environmental impact under CEQA.
2. A lead agency may adopt these provisions immediately, but no later than July 1, 2020.
3. VMT is the “most appropriate” measure of transportation impacts.
4. Other relevant considerations may include effects on transit and non-motorized travel.
5. VMT exceeding an applicable threshold may indicate a significant impact
6. Projects may be presumed to have a less than significant VMT impact if they are located in a transit priority area (TPA) or would reduce VMT.
7. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT
8. A lead agency may use models to estimate a project's VMT, and may revise those VMT estimates based on substantial evidence
9. Any assumptions used to estimate VMT must be documented and explained

What decisions do a local agency need to make to implement these new guidelines?

1. VMT Metric?
   a. VMT in absolute terms or
   b. VMT per capita, VMT per employee, VMT per service population ...
2. VMT Methodology?
   a. How to calculate VMT – travel model, spreadsheet tool, other methods
Evaluating Transportation Impacts in CEQA
Based on New Guidelines as Directed by SB 743

3 VMT Impact Significance Threshold?
   a Threshold: Level of reduction in VMT below existing conditions?
   b Thresholds: (1) Project VMT and (2) Cumulative Impacts (project’s effect on VMT)
   c Thresholds: (1) Land Use Projects, (2) Land Use Plans, (3) Transportation Projects
   d Is the level of VMT reduction compared to regional VMT, citywide VMT, or other baseline?
   e For cities and counties, are VMT impacts best addressed at the general plan level given that all
      land use decisions only influence land use supply and CEQA Section 15183 provides streamlining
      for subsequent projects?

4 VMT Mitigation Options?
   a VMT mitigation options for land use projects involve either changing the physical design of
      the project (i.e., its density, mix of use, street design, etc.) or requiring trip reduction strategies as
      part of a transportation demand management (TDM) program.
      i Are cities and counties willing to require stringent TDM programs with annual monitoring and
         adjustments if projects do not accomplish required VMT reductions?
      ii Should cities and counties instead rely on mitigation programs such as impact fee programs
         that are based on a VMT-reduction nexus?

How does the OPR Technical Advisory recommend implementing CEQA
Section 15064.3?

1 If a lead agency uses a travel model as the basis for establishing thresholds, that same model must be
   used for subsequent project level VMT analyses.
2 For land use projects and plans, the Technical Advisory states, “OPR recommends that a per capita or
   per employee VMT that is fifteen percent below that of existing development may be a reasonable
   threshold” based on substantial evidence related to the state’s GHG reduction goals.
   a Residential Project Threshold – A proposed project exceeding a level of 15 percent below existing
      VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be
      measured as regional VMT per capita or city VMT per capita.
   b Office Project Threshold – A proposed project exceeding a level of 15 percent below existing regional
      VMT per employee may indicate a significant transportation impact.
   c Retail Project Threshold – A net increase in total VMT may indicate a significant transportation
      impact.
FAQ

Evaluating Transportation Impacts in CEQA
Based on New Guidelines as Directed by SB 743

d Mixed-Use Projects – Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included. Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, a project should take credit for internal capture.

3 For transportation projects, the Technical Advisory states:
   a Because a roadway expansion project can induce substantial VMT, incorporating quantitative estimates of induced VMT is critical to calculating both transportation and other impacts of the projects.
   b Transit and active transportation projects generally reduce VMT and therefore are presumed to cause a less-than-significant impact on transportation.

4 The Technical Advisory expands Section 15064.3 options for VMT impact screening using the presumption that certain projects will have less than significant VMT impacts based on location within a low VMT generating area or by being a locally serving retail project.

5 Impacts to Transit – lead agencies should consider impacts to transit systems and bicycle and pedestrian networks. ...a project that blocks access to a transit stop or blocks a transit route itself may interfere with transit functions.

Is a lead agency required to follow recommendations in the Technical Advisory?

1 The Technical Advisory helps lead agencies think about the variety of implementation questions they face with respect to shifting to a new VMT metric.

2 The guidance is not a recipe for SB 743 implementation since lead agencies must still make their own specific decisions about methodology, thresholds, and mitigation. For cities and counties, these decisions must be consistent with their general plan, which may not be aligned with state GHG reduction goals upon which the Technical Advisory is based.

3 A lead agency has the discretion to choose the most appropriate methodology and thresholds to evaluate a project’s VMT. A lead agency may take into account both its own policy goals and context in developing a VMT methodology and thresholds.
# FAQ

## Evaluating Transportation Impacts in CEQA
Based on New Guidelines as Directed by SB 743

What are the pros and cons of following the *Technical Advisory* guidance with respect to CEQA defensibility?

<table>
<thead>
<tr>
<th>PROS</th>
<th>CONS</th>
</tr>
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<tbody>
<tr>
<td>1. Aligns with state goals for GHG reduction, infill development, transit, active transportation, and public health.</td>
<td>1. Recommends only reporting partial VMT for individual land uses, trip purposes/tours, and vehicle types. This could be interpreted as presenting an inadequate or incomplete analysis when compared to the current practice of reporting total VMT for air quality, GHG, and energy impact analysis.</td>
</tr>
<tr>
<td>2. Requires limited effort to implement.</td>
<td>2. Includes evidence that a 15 percent reduction from baseline may not be sufficient to achieve statewide goals for GHG reduction.</td>
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<tr>
<td>3. Creates VMT impact screening opportunities for housing, employment, transit, bicycle, pedestrian, and minor roadway projects.</td>
<td>3. Does not consider local general plan role in setting threshold expectations.</td>
</tr>
<tr>
<td>4. Includes specific thresholds.</td>
<td>4. Includes inconsistent threshold expectations based on the same land use and transportation context.</td>
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</table>

What other challenges should a lead agency consider?

1. Direct application of the *Technical Advisory* results in significant and unavoidable VMT impacts for projects in jurisdictions with limited transit service and low land use densities even when those projects are consistent with the local general plan.

2. Lead agencies have often used transportation demand management (TDM) strategies as mitigation to reduce VMT. Most TDM strategies are project site and building tenant dependent. Since this information is typically unknown during the project entitlement and environmental review process, a lead agency must think about whether it can guarantee TDM mitigation outcomes. This implies that ongoing monitoring and adjustment of the TDM strategies may be required and that impacts are likely to remain significant even with mitigation due to the uncertainty associated with building tenant performance over time.

3. Caltrans has published a *Draft TISG* (February 2020) that endorses the OPR Technical Advisory methodology and thresholds (Page 8). This sets the expectation that local agencies will use the OPR recommended VMT impact thresholds for all land use plans and projects.
### OPR Steps

#### Step 1 Screening

For the OPR technical advisory, projects that would not likely lead to a substantial or measurable increase in vehicle travel and therefore generally should not require an induced travel analysis include:

- Rehabilitation, resurfacing, maintenance, replacement, safety, and upgrade projects designed to improve the condition or existing transportation assets and that do not add to additional motor vehicle capacity.
- Remove or modify existing or temporary installation such as median barriers or guardrails.
- Road or shoulder enhancements to provide "breaking space" or "dotted space" for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as additional vehicle travel lanes.
- Additions of auxiliary lanes of less than one mile in length designed to improve roadway safety.
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic such as left, right, and turn lanes, bike or bus only lanes, or emergency breakdown lanes that are not opened as through lanes.
- Additions of roadway capacity to local or collector streets provided the project area substantially improves conditions for pedestrians, cyclists, and/or the handicapped.
- Conversion of existing general purpose lanes (including ramp to managed lanes on transit lanes or changing lane management on a one-way road that would not substantially increase vehicle travel.
- Additions in new lanes that are permanently controlled for use only by transit vehicles.
- Reduction in number of through lanes.
- Grade separation to separate vehicles from non-motorized, pedestrian, or bicycle, or to replace a lane in need of separate signals for non-motorized vehicles (e.g., NMD, NCL, or TRLs) on general vehicles.
- Installation, removal, or reconfiguration of traffic control devices, including Traffic Signal Priority (TSP) facilities.
- Installation of traffic calming systems, detection systems, cameras, changeable message signs and other devices designed to optimize vehicle, bicycle, or pedestrian flow.
- Turning of signals to optimize vehicle, bicycle, or pedestrian flow.
- Installation of roundabouts or traffic circles.
- Installation or reconfiguration of traffic calming devices.
- Additions of on-street or off-street parking.
- Additional surgical treatments to areas where traffic volume is between 1500 and 8000.
- Reduction of new transit service.
- Conversion of streets from one way to two way.
- Changes or non-essential number of traffic lanes.
- Removal or relocation of off-street or on-street parking spaces.
- Addition or modification of on-street parking or loading restrictions, including access, time limits, access, and changes to access parking program periods.
- Addition of traffic calming devices.
- Reduction and maintenance projects that do not add vehicle travel capacity.
- Addition of new or enhanced bike or pedestrian facilities on existing streets/bridges or within existing public right-of-way.
- Addition of bike or pedestrian facilities on existing streets/bridges or within existing public right-of-way.
- Addition of bike paths, bike tracks, and greenways as part of other off-road facilities that serve non-motorized travel.
- Installation of public available alternative traffic calming infrastructure.
- Addition of passing lanes, bike lanes, or bike track check lanes in roadways that do not increase overall vehicle capacity along the corridor.

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### Analysis Procedures

#### Step 2 Establishing Baseline VMT Levels

- **Project-Generated VMT**
  - Use the same year as baseline VMT to determine the baseline year. The baseline year should be at least the latest AHD update year or VMT input year. VMT should be calculated using the latest version of ADAMS using the P2 or DB method.

- **Project Effect on VMT**
  - Use the latest version of ADAMS and the boundary method.

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### Technical Notes

- End users should be able to use the data in the AHD release. Note that VMT calculations may require future current year data or interpolating between years.

- End users should be aware of the potential to adjust the threshold.

- As part of the SB743 SB 143 Implementation Study, local jurisdictions reviewed thresholds and methodologies. Refer to the latest guidelines for more information.
### SB743 Procedural Notes (2/2)

<table>
<thead>
<tr>
<th>OPR Steps</th>
<th>Analysis Procedures</th>
<th>Technical Notes</th>
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| **Step 4** | Identify significant impacts for all impact scenarios. Significant impact may occur if a project's Step 3 VTI exceeds Step 3 threshold or the project is found inconsistent with the RTP or SRTCP (e.g., the project generates more VMT than the adopted RTP or SRTCP). | |}

| **Step 5** | Developing Mitigation Measures | |}

| **Step 6** | Identifying Impacts of Mitigation | |}

Mitigation actions can result in other environmental impacts. Mitigation actions that require the expansion of existing facilities or services or the creation of new facilities or services may have an effect on the environment that should be evaluated as prescribed by CEQA Guidelines Section 15067.2(c).
TECHNICAL MEMORANDUM

Date: 11.11.19

To: Steve Smith (SBCTA), Josh Lee (SBCTA), Albert Espinoza (City of Rancho Cucamonga), Jason Welday (City of Rancho Cucamonga), Baldwin Ngai (City of Rancho Cucamonga)

From: Jason Pack, PE and Delia Votsch, PE

Subject: SB 743 Implementation Thresholds Assessment

This technical memorandum summarizes the consultant team assessment of potential VMT thresholds for land use projects and land use plans to comply with SB 743. For all transportation projects, lead agencies have the discretion to select their own metrics and thresholds, consistent with CEQA, and no change to current practice is required. Hence, the remainder of this memo will focus on land use thresholds and is organized into four sections.

- Section 1 - Background on CEQA Thresholds
- Section 2 - OPR VMT Threshold Recommendations
- Section 3 - Recommendations for SBCTA member agencies

Section 1 – Background on CEQA Thresholds

Establishing thresholds requires complying with the new statutes added by SB 743 and traditional guidance contained in CEQA Guidelines Section 15064.7 and new language being proposed as part of the Proposed Updates to the CEQA Guidelines, December 2018, California Governor’s Office of Planning and Research (see excerpts below).
§ 15064. Determining the Significance of the Environmental Effects Caused by a Project.

(a) Determining whether a project may have a significant effect plays a critical role in the CEQA process.

(1) If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, the agency shall prepare a draft EIR.

(2) When a final EIR identifies one or more significant effects, the lead agency and each responsible agency shall make a finding under Section 15091 for each significant effect and may need to make a statement of overriding considerations under Section 15093 for the project.

(b) [1] The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area.

(2) Thresholds of significance, as defined in Section 15064.7(a), may assist lead agencies in determining whether a project may cause a significant impact. When using a threshold, the lead agency should briefly explain how compliance with the threshold means that the project's impacts are less than significant. Compliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant.

Source: http://resources.ca.gov/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf
§ 15064.7. Thresholds of Significance.

(a) Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.

(b) Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence. Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2).

(c) When adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

(d) Using environmental standards as thresholds of significance promotes consistency in significance determinations and integrates environmental review with other environmental program planning and regulation. Any public agency may adopt or use an environmental standard as a threshold of significance. In adopting or using an environmental standard as a threshold of significance, a public agency shall explain how the particular requirements of that environmental standard reduce project impacts, including cumulative impacts, to a level that is less than significant, and why the environmental standard is relevant to the analysis of the project under consideration. For the purposes of this subdivision, an "environmental standard" is a rule of general application that is adopted by a public agency through a public review process and that is all of the following:

1. A quantitative, qualitative or performance requirement found in an ordinance, resolution, rule, regulation, order, plan or other environmental requirement;

2. Adopted for the purpose of environmental protection;

3. Addresses the environmental effect caused by the project; and,

4. Applies to the project under review.

Source: http://resources.ca.gov/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf
In summary, this threshold setting guidance emphasizes the need to use substantial evidence\(^1\) to help determine when a project will cause an unacceptable environmental condition or outcome. For SB 743, the specific outcome of focus is the change a project will cause in vehicle miles of travel (VMT). Since VMT is already used to determine air quality, energy, and greenhouse gas (GHG) impacts as part of CEQA compliance\(^2\), the challenge for lead agencies is to answer the question, "What type or amount of change in VMT constitutes a significant impact solely for transportation purposes?"

**Section 2 - OPR VMT Threshold Recommendations**

SB 743 includes the following two legislative intent statements, which were used to help guide OPR's VMT threshold decisions.

1) Ensure that the environmental impacts of traffic, such as noise, air pollution, and safety concerns, continue to be properly addressed and mitigated through the California Environmental Quality Act.

2) More appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

The threshold recommendations are found in the CEQA Guidelines and the Technical Advisory. Specific excerpts and threshold highlights are provided below.

**CEQA Guidelines Section 15064.3**

(b) Criteria for Analyzing Transportation Impacts.

(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

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\(^1\) Per the CEQA Guidelines Section 15384, substantial evidence must be based in fact, rather than conclusions or base assertions.

\(^2\) The methodology used to calculate VMT for GHG purposes should be reviewed to confirm if it is consistent with SB 743 guidance and requirements. For example, if VMT calculated for GHG emissions is truncated at a model's jurisdictional boundaries, that may require modifications for SB 743 purposes.
Based on OPR's extensive review of the applicable research, and in light of an assessment by the California Air Resources Board quantifying the need for VMT reduction in order to meet the State's long-term climate goals, OPR recommends that a per resident or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold.

As with projects, agencies should analyze VMT outcomes of land use plans across the full area over which the plan may substantively affect travel patterns, including beyond the boundary of the plan or jurisdiction's geography. And as with projects, VMT should be counted in full rather than split between origin and destination. (Emissions inventories have sometimes spit cross-boundary trips in order to sum to a regional total, but CEQA requires accounting for the full impact without truncation or discounting). Analysis of specific plans may employ the same thresholds described above for projects. A general plan, area plan, or community plan may have a significant impact on transportation if proposed new residential, office, or retail land uses would in aggregate exceed the respective thresholds recommended above.

In rural areas of non-MPO counties (i.e., areas not near established or incorporated cities or towns), fewer options may be available for reducing VMT, and significance thresholds may be best determined on a case-by-case basis. Note, however, that clustered small towns and small town main streets may have substantial VMT benefits compared to isolated rural development, similar to the transit oriented development described above.

These (and the other) threshold recommendations in the Technical Advisory rely on the following evidence associated with the state's GHG reduction goals and targets in combination with environmental case law.

- Senate Bill 32 (2016) requires at least a 40 percent reduction in greenhouse gas emissions by 2030.
- Pursuant to Senate Bill 375 (2008), the California Air Resources Board establishes greenhouse gas reduction targets for metropolitan planning organizations (MPOs) to achieve based on land use patterns and transportation systems specified in Regional Transportation Plans and Sustainable
Community Strategies. Current targets for the largest metropolitan planning organizations range from 13% to 16% reductions by 2035.

- **Executive Order S-3-05** (2005) sets a GHG emissions reduction target of 80 percent below 1990 levels by 2050.
- **Executive Order B-16-12** (2012) specifies a GHG emissions reduction target of 80 percent below 1990 levels by 2050 specifically for transportation.
- **Senate Bill 391** requires the California Transportation Plan to support 80 percent reduction in GHGs below 1990 levels by 2050.
- **The California Air Resources Board Mobile Source Strategy** (2016) describes California's strategy for containing air pollutant emissions from vehicles and quantifies VMT growth compatible with achieving state targets.
- **The California Air Resources Board’s 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California’s 2030 Greenhouse Gas Target** describes California's strategy for containing greenhouse gas emissions from vehicles and quantifies VMT growth compatible with achieving state targets.
- **California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals** (2019) identifies a 16.8 percent reduction in automobile VMT per resident below existing (2018) levels to achieve statewide GHG reduction goals.

Lead agencies should note that the OPR recommended VMT thresholds are almost exclusively based on GHG and air pollution reduction goals. While this is one of the SB 743 legislative intent objectives, a less clear connection is made to the other legislative intent objectives to encourage infill development and promote active transportation. And, as noted above, GHG impacts are already addressed in another CEQA section.

Another important distinction within the Technical Advisory is how projects within different land use contexts are treated. The general expectation that a 15 percent reduction below that of existing development may be reasonable is proposed for projects within metropolitan planning organizations (MPOs). For rural areas outside MPOs, the Technical Advisory recognizes that VMT mitigation options are limited so thresholds may need to be set on a case-by-case basis.

The recognition that land use context matters when it comes to the potential VMT mitigation options and effectiveness is important. The MPO boundary distinction is not relevant to the feasibility of VMT mitigation. A rural or suburban area inside or outside an MPO boundary will have very similar limitations when it comes to the feasibility of VMT reduction options. As such, land use context and not MPO status
should be the defining criteria for setting threshold expectations. The land use context is also relevant to the potential range of effectiveness associated with VMT reduction strategies. The Technical Advisory relies on the Quantifying Greenhouse Gas Mitigation Measures, CAPCOA, 2010 resource document to help justify the 15 percent reduction threshold stating, "...fifteen percent reduction in VMT are achievable at the project level in a variety of place types...". A more accurate reading of the CAPCOA document is that a fifteen percent is the maximum reduction when combining multiple mitigation strategies for the suburban center place type. For suburban place types, 10% is the maximum and requires a project to contain a diverse land use mix, workforce housing, and project-specific transit. It is also important to note that the maximum percent reductions were not based on data or research comparing the actual performance of VMT reduction strategies in these place types. Instead, the percentages were derived from a limited comparison of aggregate citywide VMT performance for Sebastopol, San Rafael, and San Mateo where VMT performance ranged from 0 to 17 percent below the statewide VMT/resident average based on data collected prior to 2002. Little to evidence exists about the long-term performance of similar TDM strategies in different land use contexts. As such, VMT reductions from TDM strategies cannot be guaranteed in most cases.

![Statewide CO₂ and Vehicle Miles Traveled (VMT) Per Capita Trend with Respect to Anticipated Performance of Current SB 375 SCSs²](image)

[² CO₂ and VMT calculated based on California Department of Tax and Fee Administration (CDTFA) gasoline fuel sales data]

California VMT Trends
Source: 2018 Progress Report California’s Sustainable Communities and Climate Protection Act, California Air Reserves Board, 2018
Section 3 - Recommendations for SBCTA member agencies

How should lead agencies approach VMT threshold setting given their discretion? Since an impact under CEQA begins with a change to the existing environment, a starting level for potential thresholds would be the baseline (i.e., existing condition) VMT, VMT per resident, VMT per employee, or VMT per service population3. Since VMT will increase or fluctuate with population and employment growth, changes in economic activity, and expansion of new vehicle travel choices (i.e., Uber, Lyft, Chariot, autonomous vehicles, etc.), expressing VMT measurement in an efficiency metric form allows for more direct comparisons to baseline conditions4 when it comes to land use projects, land use plans, and transportation projects. Establishing a threshold such as baseline VMT per service population would be essentially setting an expectation that future land uses perform similar to existing land uses. If this is the floor, then expectations for VMT reduction can increase depending on a community’s values related to vehicle use and its associated effects on mobility, economic activity, and environmental consequences. Working towards the 15-percent reduction recommended in the Technical Advisory becomes more feasible as the land use context becomes more urban with higher densities and high-quality transit systems. In central cities, the 15-percent reduction can be surpassed because of the close proximity of land uses and the multiple options for accessing destinations by walking, using bicycles or scooters, sharing vehicles, and using transit.

While OPR has developed specific recommended VMT impact thresholds for project-related impacts, current practice has not sufficiently evolved where a clear line can be drawn between ‘acceptable’ and ‘unacceptable’ levels of VMT change for the sole purpose of determining a significant transportation impact especially when considering land use context. Furthermore, OPR’s Guidance is only a recommendation and not binding law. Until SB 743, VMT changes were viewed through an environmental lens that focused on the relationship to fuel consumption and emissions. For transportation purposes, VMT has traditionally been used to evaluate whether land use or transportation decisions resulted in greater dependency on vehicle travel. Trying to determine whether a portion of someone’s daily vehicle travel is unacceptable or would constitute a significant transportation impact is generally not clear to lead agencies.

Another consideration in threshold setting is how to address cumulative VMT impacts and whether addressing them in the general plan EIR is advantageous for streamlining the review of subsequent land use and transportation projects given CEQA relief available through SB 375 or CEQA Guidelines Section 15183. This section of the Guidelines may relieve a project of additional environmental review if the

3 Service population is defined as the sum of residents and employees
4 Baseline conditions are typically defined as the year when a Notice of Preparation for an EIR is issued, rather than a specific year
environmental impact was adequately addressed in the general plan EIR, if there are no project-specific significant effects which are specific to the project on its site, and if the project is consistent with the general plan (see below).

15183. PROJECTS CONSISTENT WITH A COMMUNITY PLAN OR ZONING
(a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

The use of Section 15183 also addresses cumulative impacts as acknowledged in Section 15130(e).

15130. DISCUSSION OF CUMULATIVE IMPACTS
(e) If a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact, as provided in Section 15183(j).

For cities in the San Bernardino County region, addressing VMT impacts in general plan EIRs could be useful in understanding how VMT reduction should be balanced against other community values when it comes to setting new VMT impact thresholds for SB 743.

Given this information, lead agencies have at least five options for setting thresholds as outlined below. Under any option, the lead agency must develop its own substantial evidence to support their preferred threshold and should consider multiple perspectives. These perspectives include those from the community in general as well as specific stakeholder perspectives from the development community and environmental protection groups. A threshold that is too stringent could lead to a permanent significant and unavoidable VMT impact finding increasing the cost of environmental review for developers. Conversely, a threshold that does not result in any significant impacts could lead to missed opportunities to reasonably reduce VMT and related environmental impacts. In either case, attracting the attention of specific stakeholder groups can lead to CEQA challenges, which are often determined based on the strength of substantial evidence supporting lead agency decisions.
OPTION 1 – Rely on the OPR Technical Advisory Thresholds

The first option is to simply rely on the threshold recommendations contained in the OPR Technical Advisory. As noted above, the general expectation is that land use projects should be measured against a 15 percent reduction below that of existing baseline conditions. Specific VMT thresholds for residential, office (work-related), and retail land uses are summarized below.

- Residential projects – A proposed project exceeding a level of 15 percent below existing (baseline) VMT per resident may indicate a significant transportation impact. Existing VMT per resident may be measured as regional VMT per resident or as city VMT per resident.
- Office projects – A proposed project exceeding a level of 15 percent below existing (baseline) regional VMT per employee may indicate a significant transportation impact.
- Retail projects – A net increase in total VMT may indicate a significant transportation impact.

For land use plans (i.e., a general plan, area plan, or community plan), a significant impact would occur if the respective thresholds above were exceeded in aggregate. This means that new population and employment growth combined the planned transportation network would need to generate future VMT per resident or VMT per worker that is less than 85 percent of the baseline value to be considered less than significant. Land use project and land use plans would also need to be consistent with the applicable RTP/SCS.

A potential limitation of the OPR recommendations is that the substantial evidence used to justify the thresholds is largely based on the state’s air quality and GHG goals. Four main issues arise from this reliance.

- The OPR recommended threshold does not establish a level of VMT reduction that would result in the state meeting it’s air quality and GHG goals according to the California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals (2019). This may create confusion with air quality and GHG impact analysis in environmental documents, which should already address the influence of VMT.

- The OPR recommended thresholds do not directly reflect expectations related to the other SB 743 objectives related to statewide goals to promote public health through active transportation, infill development, multimodal networks, and a diversity of land uses. Recommending a reduction below baseline levels is consistent with these objectives, but the numerical value has not been tied to specific statewide values for each objective or goal.
- State expectations for air quality and GHG may not align with local/lead agency expectations. Using state expectations for a local lead agency threshold may create inconsistencies with local city or county general plans.
- Each agency relying upon OPR’s recommended threshold should still develop and set forth the substantial evidence explaining why OPR’s recommendation is appropriate for the individual agency adopting it.

**OPTION 2 – Set Thresholds Consistent with Lead Agency Air Quality, GHG Reduction, and Energy Conservation Goals**

This option sets a threshold consistent with a lead agency’s air quality, GHG reduction, and energy conservation goals. A local agency would have to provide substantial evidence justifying why any threshold would meet statewide GHG goals. This approach requires that local air quality and GHG reduction goals in general plans, climate action plans, or GHG reduction plans comply with the legislation and associated plans described above on pages 5 and 6. In general, most of the expectations set through legislation are related to the state’s GHG reduction goals that were originally captured in EO S-3-05.

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

SB 32 expanded on these goals and added the expectation that the state should reach 40 percent below 1990 levels by 2030 followed by SB 391 that requires the California Transportation Plan to support 80 percent reduction in GHGs below 1990 levels by 2050. With respect to the land use and transportation sectors, SB 375 tasked ARB with setting specific GHG reduction goals through the RTP/SCSS prepared by MPOs. The ARB Scoping Plan and Mobile Source Strategy provide analysis related to how the state can achieve the legislative and executive goals while the Caltrans Strategic Management Plan and Smart Mobility Framework provide supportive guidance and metrics. An important recognition of the ARB Scoping Plan and Mobile Source Strategy is that the initial SB 375 targets were not aggressive enough. The state needs to achieve a reduction of 7 percent below projected 2030 VMT levels and 15 percent below projected 2050 VMT levels associated with the first round of RTP/SCSs (see chart below).
Statewide On-Road GHG Emissions
Source: [https://www.arb.ca.gov/cc/sb375/final_staff_proposal_sb375_target_update_october_2017.pdf](https://www.arb.ca.gov/cc/sb375/final_staff_proposal_sb375_target_update_october_2017.pdf) (pg. 12)

Note that the baseline trend in the chart did not consider key disruptive trends such as transportation network companies (TNCs) and autonomous vehicles (AVs) so it is possible that baseline VMT may be higher. Further, the climate planning scenario did not consider the recently issued Governor’s Executive Order (EO) B-55-18 that establishes the goal to achieve carbon neutrality no later than 2045. Consideration of these factors would increase the level of VMT reduction needed to achieve the State’s climate goals.

The most recent ARB analysis contained in California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals, January 2019 recommends project specific VMT reduction thresholds of 16.8 percent reduction from baseline for light-duty vehicle VMT (i.e., passenger cars and light trucks) or a 14.3 percent reduction for total VMT (i.e., all vehicles) – see excerpt below. These reductions are dependent on MPO RTP/SCS targets being met, which may not be a reasonable assumption for CEQA purposes given the information presented above from the 2018 Progress Report.
California's Sustainable Communities and Climate Protection Act. Also, ARB does not provide details about whether the VMT values should be compared against jurisdictional or regional baseline values. Since the analysis was based on statewide data, it may be reasonable to presume that the reduction expectation is a fair-share expectation for all jurisdictions.

Figure 2: California Total Daily VMT Per Capita

ARB Recommended Total VMT per Resident Threshold
Source: California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals, January 2019
One benefit of relying on ARB or other state agencies for a threshold recommendation is the CEQA Guidelines provision in Section 15064.7(c) highlighted below.

§ 15064.7. Thresholds of Significance.

(a) Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency, and compliance with which means the effect normally will be determined to be less than significant.

(b) Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. Thresholds of significance to be adopted for general use as part of the lead agency’s environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence. Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2).

(c) When adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

ARB meets the criteria of being a public agency and having noted expertise in the areas of VMT and emissions analysis. Further, the recommended threshold values above were developed in specific consideration of SB 743 requirements.

One other agency threshold to consider is Caltrans. The Local Development-Intergovernmental Review (LD-IGR) Branch at Caltrans (http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa.html) has responsibility to reduce potential adverse impacts of local development on the state transportation system. As part of its responsibilities, each district branch performs reviews of CEQA environmental documents for local land use projects. These reviews include providing expectations for transportation impact analysis such as metrics and thresholds. Caltrans has published initial guidance related to SB 743 implementation.


An important part of the Caltrans guidance are the following expectations for thresholds and impact findings related to VMT.
A. Comment on Vehicle Miles Traveled associated with the project.

Reviewers should comment on vehicle miles traveled resulting from the land use project, applying local agency thresholds or absent those, thresholds recommended by the most recent draft of an OPR's adopted CEQA Guidelines and/or OPR's approved Technical Advisory. If an assessment of VMT is not presented, Caltrans should request it be presented. Though SB 743 clarifies requirements for transportation analysis, a VMT analysis is already needed to meet other CEQA requirements. Methods for assessing VMT should be comparable to the methods recommended in the OPR's approved Technical Advisory. Where methods are not consistent with the recommendations in the Technical Advisory, Caltrans should comment on those methods. Where the project exhibits less than threshold VMT, Caltrans comments should acknowledge the project's transportation efficiency. Where the project exhibits greater than threshold VMT, Caltrans should request mitigation. Examples of mitigation measures are included in the OPR Technical Advisory. Contact the Caltrans SB 743 Program Implementation Manager, Alyssa Begley, for assistance with VMT calculation.


When Caltrans reviews CEQA documents, they may function as a reviewing agency or a responsible agency. In a responsible agency role, Caltrans has approval authority over some component of the project such as an encroachment permit for access to the state highway system. Comments from Caltrans should be adequately addressed, and special attention should be paid to those comments when Caltrans serves as a responsible agency since an adequate response may be required to obtain their required approval. The interim guidance above does not endorse the Technical Advisory recommendations for thresholds; it only requires IGR staff to 'comment' on VMT analysis. However, Caltrans is working to establish specific VMT thresholds per conversations with Alyssa Begley, SB 743 Program Implementation Manager with Caltrans. Further, Caltrans may have already establish GHG thresholds that could also serve as VMT thresholds.

In the draft Interim Guidance: Determining CEQA Significance For Greenhouse Gas Emissions for Projects on the State Highway System, California Department of Transportation, 2018, Caltrans recommends that any increase in GHG emissions would constitute a significant impact (see excerpt below).
Interim Caltrans GHG Thresholds

Source: *Interim Guidance: Determining CEQA Significance For Greenhouse Gas Emissions for Projects on the State Highway System, California Department of Transportation, 2018*

Since any increase in VMT would result in an increase in GHG emissions, lead agencies could rely on this Caltrans threshold for VMT purposes using the same 15064.7(c) provision above. Using this threshold would result in most land use projects and land use plans resulting in significant impacts but it would also result in the maximum feasible mitigation for VMT.

**OPTION 3 – Set Thresholds Consistent with RTP/SCS Future Year VMT Projections by Jurisdiction or Sub-Region**

VMT is a composite metric that is created as an output of combining a community’s long-term population and growth projections with its long-term transportation network (i.e., the general plan). Other variables are also in play related to travel behavior, but land use changes and transportation network modifications are the items largely influenced or controlled by cities and counties. As such, every city and county unincorporated area within SBCTA already has a VMT growth budget. This is the amount of VMT that is forecast to be generated from their general plans combined with other travel behavior inputs for the region as captured in the RIVTAM or SCAG regional travel forecasting models as part of regional planning and the RTP/SCS. This VMT growth has already been approved by the community, the region, and the state and could serve as the basis of a VMT threshold expressed as a VMT growth budget or as a VMT efficiency metric based on the future year VMT per resident, VMT per employee, or VMT per service population. The measurement of VMT could occur at the jurisdictional or sub-region level.
Potential limitations of this approach relate to model sensitivity and forecast accuracy/reasonableness. If a general plan includes policies or implementation programs designed to reduce VMT through transportation demand management (TDM) strategies, the regional models did not likely include these effects. Further, current regional models do not capture major disruptive trend effects such as TNCs, AVs, and internet shopping. The regional models may also have other issues with forecasting accuracy or reasonableness due to a disconnect between RTP/SCS expectations and the realities of transportation investments and local agency land use decisions as noted in the 2018 Progress Report California’s Sustainable Communities and Climate Protection Act, California Air Resources Board, November 2018.

OPTION 4 – Set Thresholds Based on Baseline VMT Performance
As noted above, an impact under CEQA begins with a change to the existing or baseline environment. There are a range of approaches to using this starting point for VMT impact analysis. At one end of the spectrum is ‘total daily VMT’ generated under baseline conditions. Setting this value as the threshold for a jurisdiction could result in a fixed budget that would limit increases such that even small increases could result in a significant impact. Alternatively, the baseline VMT per resident, VMT per employee, or VMT per service population could be used to establish an efficiency metric basis for impact evaluation. Using this form of VMT would mean that future land use projects would be expected to perform no worse than existing land use projects and only projects that cause an increase in the rate of VMT generation would cause significant impacts. Since VMT will increase or fluctuate with population and employment growth, changes in economic activity, and expansion of new vehicle travel choices (i.e., Uber, Lyft, AVs, etc.), expressing VMT measurement in an efficiency metric form allows for more direct comparisons to baseline conditions when it comes to land use projects, land use plans, and transportation projects. Setting a threshold based on baseline levels should consider how the threshold complies with the SB 743 statute provisions described at the beginning of this memo as well as whether VMT reduction strategies are feasible in the jurisdiction.

OPTION 5 – Set Thresholds Based on Maximum Achievable VMT Reduction
Programs and practices designed to reduce VMT are referred to as transportation demand management (TDM) strategies. TDM strategies range from programs such as employers providing subsidized or free transit passes to constructing new infrastructure such as bicycle or pedestrian paths. The VMT reduction associated with different TDM measures has been published in research papers. In August 2010 the California Air Pollution Control Officers Association (CAPCOA) published Quantifying Greenhouse Gas Mitigation Measures. This report identified 50 transportation measures, 41 of which are applicable at the building and site level. Of these strategies, only a few are likely to be effective in rural or suburban settings such as those found in San Bernardino County. As such, a threshold could be based on the maximum achievable reduction in VMT, based on the TDM measures that would be feasible in the jurisdiction in which the project is located.
The August 2010 CAPCOA report identified an estimate for the expected reduction associated with each TDM measure. The most current research now suggests that these expected reduction targets are aggressive and not achievable in most areas. Implementation of several TDM measures can vary significantly for similar areas and uses. For example, any TDM measures associated with employment uses are dependent upon the employer. Office buildings in the same neighborhood with different tenants may not achieve the same reduction targets.

The maximum achievable reduction is also influenced by key factors such as urban context, the size of the project, and access to transit. Detailed analysis would be required to determine the feasible mitigation measures for a specific project and location. However, a 15% threshold, as identified by OPR, would not be feasible throughout most of the unincorporated and rural areas of the county. Areas in the West Valley with high quality transit could potentially achieve a reduction between 5% and 10%, while the more rural and unincorporated areas of San Bernardino County would have a lower maximum achievable reduction, likely less than 4%.
This technical memorandum summarizes our assessment of new research related to transportation demand management (TDM) effectiveness for reducing vehicle miles of travel (VMT). The purpose of this work was to understand what options are available to mitigate VMT, to compile new TDM information that has been published in research papers since release of the Quantifying Greenhouse Gas Mitigation Measures, CAPCOA, August 2010 and to identify those strategies suited to SBCTA member jurisdictions given the varying land use context. The land use and transportation context for SBCTA presents a challenge to the effectiveness of common TDM strategies for VMT reduction when applied at individual project sites due to limited travel choices. The matrix in Attachment A summarizes the overall evaluation of all the CAPCOA strategies while the matrix in Attachment B identifies the top twelve strategies suited for the study area.

Mitigation Programs

The approach to the overall assessment includes two parts. The first part evaluated how VMT reduction strategies or projects could be developed or incorporated into existing funding programs such as Transportation Impact Fee (TIF) program. The purpose of incorporating VMT reduction strategies directly into existing programs is to provide greater certainty and effectiveness for VMT impact mitigation. The second part of the assessment identified potential new mitigation program concepts that may be worthy of further evaluation.
Existing Programs

Most SBCTA member jurisdictions maintain Traffic Impact Fees. These programs collect a fair-share fee payment from new development to contribute to the cost of a capital improvement program (CIP) consisting of long-term transportation network expansion projects identified to accommodate planned population and employment growth. A common theme for the existing programs is that they focus on vehicle trips or vehicle LOS as the key metric for determining deficiencies and developing CIP projects.

In their current form, most of the impact fees would not qualify as VMT impact mitigation programs. Most CIPs include roadway capacity expansion that contributes to VMT increases. Expanding roadway capacity in congested areas induces new vehicle travel that diminishes congestion relief benefits and generates new VMT and emissions. Refer to the following websites for more research information and technical details.

- [https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf](https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf)

Many CIPs also include operational improvements, such as signal coordination projects, which would not contribute to an increase in VMT. Most CIPs also include some transit, bicycle, and pedestrian projects that could contribute to VMT reduction.

If the transit, bicycle, and pedestrian projects were separated into a stand-alone CIP with a supporting nexus study based on VMT reduction, then a new VMT fee program could be developed that is dedicated to VMT impact mitigation. This could be a new program implemented by the SBCTA member jurisdictions as a collaborative or as individual jurisdictions. An example of this type of program has been developed the City of Los Angeles as part of their Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan. Details are provided at the following website. [http://www.westsidemobilityplan.com/ctcs-pwia-timp-final-eu/](http://www.westsidemobilityplan.com/ctcs-pwia-timp-final-eu/)

It may also be possible for a development project applicant to fully fund a transit, bicycle, or pedestrian project from a CIP as an alternative to paying the fee directly. Some fee programs currently allow fee credits for development that expedites and completes CIP-identified projects. Using this option requires inclusion of the mitigation in a development agreement or an EIR.

Managing and reducing demand could accomplish the goal of reducing peak period VMT. The main source of congestion is typically defined as vehicles move too slowly (i.e., peak period speeds are lower than posted speed limits). This definition of congestion describes a symptom and fails to recognize that peak period travel consists of vehicles with poor seat utilization caused by not managing demand more
effectively and mispricing travel demand. The existing roadway network has a limited capacity and this capacity is routinely filled up during peak periods in San Bernardino County by vehicles with solo drivers (i.e., low seat utilization). Further, limited facilities exist that prioritize travel by high occupancy vehicles. Increasing vehicle speeds and reducing delays substantially requires much greater seat utilization in existing vehicles (i.e., private vehicles and public transit). This change would also reduce VMT. Hence, refocusing on the combination of congestion management and VMT reduction would result in a different CIP that could qualify as VMT impact mitigation.

New Mitigation Program Concepts

Beyond the conventional programs described above are two new concepts that are not currently available in the SBCTA area. For purposes of this study, these programs are defined as follows.

- **VMT Mitigation Exchange** – An exchange program is a concept where VMT generators can select from a pre-approved list of mitigation projects that may be located within the same jurisdiction or possibly from a larger area. The intent is to match the project’s needed VMT reduction with a specific mitigation project of matching size and to provide evidence that the VMT reduction will reasonably occur.

- **VMT Mitigation Bank** – A mitigation bank is intended to serve as an entity or organization that pools fees from development projects across multiple jurisdictions to spend on larger scale mitigation projects. This concept differs from the more conventional impact fee program approach described above in that the fees are directed to a few larger projects that have the potential for a more significant reduction in VMT and the program is regional in nature.

As these new mitigation program concepts are still evolving, the specific descriptions and elements of the programs will likely change. The first resource document to describe and assess these programs was recently published by U.C. Berkeley and is entitled, "Implementing SB 743, An Analysis of Vehicle Miles Traveled Banking and Exchange Frameworks," The University of California Institute of Transportation Studies, October 2018. This document is a useful starting place for a dialogue about these programs.

The findings of the report are supportive of these concepts noting the following about the reasoning for their consideration.

Yet while methods for reducing VMT impacts—such as mileage pricing mechanisms, direct investments in new public transit infrastructure, transit access subsidies, and infill development incentives—are well understood, they may be difficult in some cases to implement as mitigation projects directly linked or near to individual developments. As a result, broader and more flexible approaches to mitigation may be necessary. In response, state and local policy makers are considering the creation of mitigation "banks" or "exchanges." In a mitigation bank, developers
would commit funds instead of undertaking specific on-site mitigation projects, and then a local or regional authority could aggregate these funds and deploy them to top-priority mitigation projects throughout the jurisdiction. Similarly, in a mitigation exchange, developers would be permitted to select from a list of pre-approved mitigation projects throughout the jurisdiction (or propose their own), without needing to mitigate their transportation impacts on-site. Both models can be applied at a city, county, regional, and potentially state scale, depending on local development patterns, transportation needs and opportunities, and political will.

This reasoning is important for lead agencies in the SBCTA area because mitigating VMT impacts on a project-by-project basis is challenging especially in suburban land use contexts where travel choices are limited. That said, the UCB report and research conducted for this study identified the following key challenges with these types of programs.

- **Challenges for Mitigation Exchanges**
  - Potential mismatch between funds and mitigation projects available
  - Potential for reduced oversight of project selection
  - Difficulty in verifying VMT reductions and their sustainability especially with VMT generation changing over time due to disruptive transportation trends such as transportation network companies (TNCs) and autonomous vehicles (AVs)
  - Difficulty in demonstrating an essential nexus
  - Potential opposition to mitigation not directly occurring in the project impact area especially if impacts are concentrated in or near disadvantaged communities and the mitigation occurs in more affluent areas

- **Challenges for Mitigation Banks**
  - Increased need to conduct careful CEQA/Mitigation Fee Act analysis
  - Accounting challenge in delay from fee payment to project funding
  - Greater need for program administration budget
  - Political difficulty in distributing mitigation projects and coordinating across jurisdictions
  - Difficulty in verifying VMT reductions and their sustainability especially with VMT generation changing over time due to disruptive transportation trends such as transportation network companies (TNCs) and autonomous vehicles (AVs)
  - Difficulty in demonstrating an essential nexus
  - Potential opposition to mitigation not directly occurring in the project impact area especially if impacts are concentrated in or near disadvantaged communities and the mitigation occurs in more affluent areas

Another important element for either of these concepts is to have an entity that is responsible for establishing, operating, and maintaining the program. This is a potential role for a sub-regional or regional entity especially for programs that would extend mitigation projects beyond individual
jurisdictional boundaries. A key part of 'operations' is that the entity will need the capability to provide verification of the VMT reduction performance and to adjust the program projects over time. Whether the entity is regional or sub-regional is another important consideration. A sub-regional entity could help minimize potential concerns about mitigation not occurring near the project site or in the same community.

The potential desire for VMT Mitigation Exchanges or Banks may depend on how lead agencies and developers respond to the initial implementation of SB 743 currently schedule to go into effect July 1, 2020. If many projects are found to have significant VMT impacts and problems occur with finding feasible mitigation measures for individual projects, then interest may grow for more program-based mitigation.

**TDM Strategies**

This information can be used as part of the SB 743 implementation to determine potentially feasible VMT mitigation measures for individual land use projects in the SBCTA area. An important consideration for the mitigation effectiveness is the scale for TDM strategy implementation. The biggest effects of TDM strategies on VMT (and resultant emissions) derive from regional policies related to land use location efficiency and infrastructure investments that support transit, walking, and bicycling. While there are many measures that can influence VMT and emissions that relate to site design and building operations, they have smaller effects that are often dependent on final building tenants. Figure 1 presents a conceptual illustration of the relative importance of scale.

![Figure 1: Transportation-Related GHG Reduction Measures](image)

Of the 50 transportation measures presented in the CAPCOA 2010 report *Quantifying Greenhouse Gas Mitigation Measures*, 41 are applicable at building and site level. The remaining nine are functions of, or depend on, site location and/or actions by local and regional agencies or funders. Table 1 summarizes the strategies according to the scope of implementation and the agents who would implement them.
TABLE 1: SUMMARY OF TRANSPORTATION-RELATED CAPCOA MEASURES

<table>
<thead>
<tr>
<th>Scope</th>
<th>Agents</th>
<th>CAPCOA Strategies (see full CAPCOA list below)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Operations</td>
<td>Employer, Manager</td>
<td><strong>26 total</strong> from five CAPCOA strategy groups:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 3 from 3.2 Site Enhancements group</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 3 from 3.3 Parking Pricing Availability group</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 15 from 3.4 Commute Trip Reduction group</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 2 from 3.5 Transit Access group</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 3 from 3.7 Vehicle Operations group</td>
</tr>
<tr>
<td>Site Design</td>
<td>Owner, Architect</td>
<td><strong>15 total</strong> from three strategy groups:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 6 from 3.1 Land Use group</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 6 from 3.2 Site Enhancements group</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 1 from 3.3 Parking group</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 2 from 3.6 Road Access group</td>
</tr>
<tr>
<td>Location Efficiency</td>
<td>Developer, Local Agency</td>
<td><strong>3 shared</strong> with Regional and Local Policies</td>
</tr>
<tr>
<td>Alignment with Regional and Local Policies</td>
<td>Regional and local agencies</td>
<td><strong>3 shared</strong> with Location Efficiency</td>
</tr>
<tr>
<td>Regional Infrastructure and Services</td>
<td>Regional and local agencies</td>
<td><strong>6 total</strong></td>
</tr>
</tbody>
</table>

Of these strategies, some are likely to be effective in denser areas, while others will be less applicable in rural or suburban setting. In the SBCTA area, key factors that determine which reduction measures will be effective such as density and access to transit vary throughout and within the jurisdictions. To help narrow the list, we reviewed how land use context could influence each strategy’s effectiveness and identified the seven for more detailed review. These strategies are described in Attachment B and listed below. Please note that disruptive trends, including but not limited to, transportation network companies (TNCs), autonomous vehicles (AVs), internet shopping, and micro-transit may affect the future effectiveness of these strategies.

1. **Increase diversity of land uses** – This strategy focuses on inclusion of mixed uses within projects or in consideration of the surrounding area to minimize vehicle travel in terms of both the number of trips and the length of those trips.

2. **Provide pedestrian network improvements** – This strategy focuses on creating a pedestrian network within the project and connecting to nearby destinations. Projects in the SBCTA area range in size, so the emphasis of this strategy for smaller projects would likely be the construction of network improvements that connect the project sites directly to nearby destinations. For larger projects, this strategy could focus on the development of a robust pedestrian network within the project itself. Alternatively, implementation could occur through an impact fee program such as the TUMF or benefit/assessment district based on local or regional plans.
3. **Provide traffic calming measures and low-stress bicycle network improvements** – This strategy combines the CAPCOA research focused on traffic calming with new research on providing a low-stress bicycle network. Traffic calming creates networks with low vehicle speeds and volumes that are more conducive to walking and bicycling. Building a low-stress bicycle network produces a similar outcome. Implementation options are similar to strategy 2 above. One potential change in this strategy over time is that e-bikes (and e-scooters) could extend the effective range of travel on the bicycle network, which could enhance the effectiveness of this strategy.

4. **Implement car-sharing program** – This strategy reduces the need to own a vehicle or reduces the number of vehicles owned by a household by making it convenient to access a shared vehicle for those trips where vehicle use is essential. Note that implementation of this strategy would require regional or local agency implementation and coordination and would not likely be applicable for individual development projects.

5. **Increase transit service frequency and speed** – This strategy focuses on improving transit service convenience and travel time competitiveness with driving. While the SBCTA area has fixed route rail and bus service that could be enhanced, it’s also possible that new forms of low-cost demand-responsive transit service could be provided. The demand-responsive service could be provided as subsidized trips by contracting to private TNCs or Taxi companies. Alternatively, a public transit operator could provide the subsidized service but would need to improve on traditional cost effectiveness by relying on TNC ride-hailing technology, using smaller vehicles sized to demand, and flexible driver employment terms where drivers are paid by trip versus by hour. This type of service would reduce wait times for travelers and improve the typical in-vehicle travel time compared to traditional transit. Note that implementation of this strategy would require regional or local agency implementation, substantial changes to current transit practices, and would not likely be applicable for individual development projects.

6. **Encourage telecommuting and alternative work schedules** – This strategy relies of effective internet access and speeds to individual project sites/buildings to provide the opportunity for telecommuting. The effectiveness of the strategy depends on the ultimate building tenants and this should be a factor in considering the potential VMT reduction.

7. **Provide ride-sharing programs** – This strategy focuses on encouraging carpooling and vanpooling by project site/building tenants and has similar limitations as strategy 10 above.

Because of the limitations noted above, strategies 1, 2, 3, 4, and 7 are initially considered the highest priorities for individual land use project mitigation subject to review and discussion with the project team.

The VMT reduction strategies can be quantified using CAPCOA calculation methodologies and recent ARB research findings. Attachment C provides calculation methodologies for each of the mitigations provided above, along with their range of effectiveness.
Summary

To help understand the full range of VMT impact mitigation and their benefits and challenges, Table 2 provides a high-level summary comparison.
### Table 2 – Summary of VMT Impact Mitigation Options

<table>
<thead>
<tr>
<th>Mitigation Option</th>
<th>Description</th>
<th>Benefits</th>
<th>Challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>No feasible action</td>
<td>This option recognizes that feasible mitigation is not available due to the land use or transportation context.</td>
<td>- Recognizes the limitations of VMT impact mitigation when alternatives to driving are not reasonably available.</td>
<td>Could result in more significant and unavoidable (SAU) impacts that require an EIR instead of a negative declaration.</td>
</tr>
<tr>
<td>Change project</td>
<td>This option would tend to focus on changing built environment characteristics of a project such as its land use density or diversity to reduce vehicle travel.</td>
<td>- Mitigation may not require long-term monitoring (see substantial evidence summarized in the SB 743 Implementation TDM Strategy Assessment Technical Memorandum dated 6.11.18).  - Mitigation reduces VMT (and other vehicle travel) in immediate vicinity of the project site.</td>
<td>Project applicants may resist land use or other built environment changes due to financial concerns and market feasibility.</td>
</tr>
<tr>
<td>TDM</td>
<td>This option relies on strategies to reduce vehicle travel through incentives and disincentives often tied to the cost and convenience of vehicle travel.</td>
<td>- Mitigation reduces VMT (and other vehicle travel) in immediate vicinity of the project site.  - Multiple mitigation strategies to choose from such that a project applicant may find co-benefits from the strategies also serving as project amenities.</td>
<td>- Mitigation monitoring required because effectiveness depends on building tenants, which can change over time. As a result, impacts will remain SAU.  - Creates potential financial equity issues between existing and new land uses. Existing land use with TDM mitigation will have lower operating costs.  - Limited reduction based on applicable or relevant strategies</td>
</tr>
<tr>
<td>Impact fee program</td>
<td>This option requires developing a new impact fee program with a nexus</td>
<td>- Provides clear expectations for</td>
<td>Requires lead agency to develop stakeholder support and funding to</td>
</tr>
<tr>
<td>Mitigation Option</td>
<td>Description</td>
<td>Benefits</td>
<td>Challenges</td>
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<td>------------------------</td>
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<tr>
<td></td>
<td>based on VMT reduction. This type of nexus would allow the fee program</td>
<td>developers about the VMT mitigation costs.</td>
<td>create and maintain the fee program.</td>
</tr>
<tr>
<td></td>
<td>capital improvement program (CIP) to include transit, bicycle, pedestrian</td>
<td>• Increases funding for VMT reduction projects such that larger and more effective projects</td>
<td>• Mitigation (e.g., CIP projects) may not occur in immediate vicinity of the project site where impacts of vehicle travel will be most directly felt by neighbors.</td>
</tr>
<tr>
<td></td>
<td>and other types of projects that can demonstrate VMT reduction effectiveness.</td>
<td>may be implemented.</td>
<td></td>
</tr>
<tr>
<td>Mitigation bank/exchange</td>
<td>This option matches VMT generators with VMT reducers within or beyond</td>
<td>- Could create mitigation options that may not otherwise be available or feasible.</td>
<td>Requires an entity capable of operating and maintaining the program with the ability to verify VMT reductions.</td>
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<tr>
<td></td>
<td>jurisdictional boundaries through a third party.</td>
<td>• Not limited to jurisdictional boundaries.</td>
<td>• Mitigation may not occur in immediate vicinity of the project site where impacts of vehicle travel will be most directly felt by neighbors.</td>
</tr>
<tr>
<td>General plan coverage</td>
<td>This option would address VMT impacts through a general plan update or</td>
<td>Addresses VMT reduction expectations in consideration of other jurisdictional objectives.</td>
<td>- General plan updates or amendments require substantial time and funding commitments.</td>
</tr>
<tr>
<td></td>
<td>amendment EIR and rely on CEQA Guidelines Section 15183 for subsequent</td>
<td>• Offers a wider range of mitigation options than at the project-scale.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>project streamlining (as summarized in the SB 743 Implementation</td>
<td>• For subsequent projects consistent with the general plan, additional VMT impact analysis</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Thresholds Assessment Technical Memorandum dated 10.31.18).</td>
<td>would not be required.</td>
<td></td>
</tr>
<tr>
<td>CAPCOA Category</td>
<td>CAPCOA Policy</td>
<td>CAPCOA Strategy</td>
<td>CAPCOA Reduction: 65% of VMT reduction due to increased density</td>
</tr>
<tr>
<td>-----------------</td>
<td>---------------</td>
<td>----------------</td>
<td>-------------------------------------------------</td>
</tr>
<tr>
<td>Land Use/Location</td>
<td>5/12</td>
<td>UA: Urban Density</td>
<td>Adequate</td>
</tr>
<tr>
<td></td>
<td></td>
<td>UA: Urban Density</td>
<td>Increasing residential density is associated with travel VMT per capita. Increased residential density in areas with high population density may lead to greater VMT change than increases in regions with lower density.</td>
</tr>
<tr>
<td>Land Use/Location</td>
<td>5/18</td>
<td>UA: Urban Density</td>
<td>Adequate</td>
</tr>
<tr>
<td></td>
<td></td>
<td>UA: Urban Density</td>
<td>Reduction in VMT due to increased urbanization, larger and more robust urban areas.</td>
</tr>
</tbody>
</table>

Primary sources:
<table>
<thead>
<tr>
<th>CAPCDR Category</th>
<th>CAPCDR #</th>
<th>CAPCDR Strategy</th>
<th>CAPCDR Reduction</th>
<th>Strength of Substantial Evidence for CO2 Impact Analysis</th>
<th>Literature or Evidence Cited</th>
<th>Change in VMT Reduction compared to CAPCDR</th>
<th>Literature or Evidence Cited</th>
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</thead>
<tbody>
<tr>
<td>Neighborhood by Element</td>
<td>NE1</td>
<td>101% - 30% improvement</td>
<td>90% - 20% reduction in VMT for modestly increased travel times</td>
<td>Weak - not recommended without additional study</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Neighborhood by Element</td>
<td>NE2</td>
<td>102% - 30% improvement</td>
<td>90% - 20% reduction in VMT for modestly increased travel times</td>
<td>Weak - not recommended without additional study</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Neighborhood by Element</td>
<td>NE3</td>
<td>103% - 30% improvement</td>
<td>90% - 20% reduction in VMT for modestly increased travel times</td>
<td>Weak - not recommended without additional study</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**New Information Since CAPCDR Was Published in 2020**

1. N/A

**New Information in VMT Reduction compared to CAPCDR**

N/A

**New Information in Literature or Evidence Cited**

N/A
<table>
<thead>
<tr>
<th>GAPCODA Category</th>
<th>GAPCODA Proposal</th>
<th>Strength of Substantial Evidence for VMT Impact</th>
<th>Change in VMT Induction compared to GAPCODA</th>
<th>Literature or Evidence Endd</th>
</tr>
</thead>
<tbody>
<tr>
<td>Neighborhood Fix</td>
<td>3.2.6</td>
<td>VMT Impact on Fixing Program</td>
<td>Moderate</td>
<td>3%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking</td>
<td>3.1.1</td>
<td>VMT Impact on Parking Density</td>
<td>High</td>
<td>5%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking</td>
<td>3.1.7</td>
<td>VMT Impact on Parking density from Property Line</td>
<td>High</td>
<td>5%</td>
</tr>
<tr>
<td>CAPCOA Category</td>
<td>CAPCOA #</td>
<td>CAPCOA Strategy</td>
<td>CAPCOA Redaction</td>
<td>Strength of Substantiated Evidence for NAPA Impact Analysis?</td>
</tr>
<tr>
<td>-----------------</td>
<td>-----------</td>
<td>----------------</td>
<td>------------------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td>Parking Pricing</td>
<td>67.3</td>
<td>VMT 1 Implement Market Price Parking Pricing</td>
<td>4.4% VMT reduction due to &quot;park and ride&quot; behavior and decreased congestion</td>
<td>Adequate</td>
</tr>
<tr>
<td>Surface Area</td>
<td>57.4</td>
<td>VMT 1 Implement Surface Area Parking Pricing</td>
<td>4.6% VMT reduction due to increased demand and decreased speed and capacity</td>
<td>Adequate</td>
</tr>
<tr>
<td>Surface Area</td>
<td>56.5</td>
<td>VMT 1 Implement Surface Area Access Management</td>
<td>4.3% VMT reduction by increasing demand and supply in areas of high demand</td>
<td>Adequate</td>
</tr>
<tr>
<td>Capacity For Reduction</td>
<td>56.3</td>
<td>VMT 1 Implement 10% Parking Reduction</td>
<td>1.3% VMT reduction due to reduced demand and increased speed and capacity</td>
<td>Adequate</td>
</tr>
<tr>
<td>Economic Day Reduction</td>
<td>242</td>
<td>VMT 1 Implement 10% Parking Reduction</td>
<td>3% VMT reduction due to reduced demand and increased speed and capacity</td>
<td>Adequate</td>
</tr>
<tr>
<td>CAPCOA Category</td>
<td>CAPCOA #</td>
<td>CAPCOA Strategy</td>
<td>Strength of Substantial Evidence for CAPCOA Impact</td>
<td>Change in VMT Reduction Compared to CAPCOA</td>
</tr>
<tr>
<td>-----------------</td>
<td>----------</td>
<td>-----------------</td>
<td>--------------------------------------------------</td>
<td>------------------------------------------</td>
</tr>
<tr>
<td>Common Trip Reduction</td>
<td>24-23</td>
<td>107</td>
<td>Formalized Employee Monitoring Program</td>
<td>Adequate Evidence of Effectiveness in reducing trip counts per day</td>
</tr>
<tr>
<td>Common Trip Reduction</td>
<td>24-24</td>
<td>107</td>
<td>Formalized Employee Monitoring Program</td>
<td>Adequate Evidence of Effectiveness in reducing trip counts per day</td>
</tr>
<tr>
<td>Common Trip Reduction</td>
<td>24-25</td>
<td>107</td>
<td>Formalized Employee Monitoring Program</td>
<td>Adequate Evidence of Effectiveness in reducing trip counts per day</td>
</tr>
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<td>Common Trip Reduction</td>
<td>24-26</td>
<td>107</td>
<td>Formalized Employee Monitoring Program</td>
<td>Adequate Evidence of Effectiveness in reducing trip counts per day</td>
</tr>
</tbody>
</table>

New Information Since CAPCOA Was Published in 2010:
- New information about the impact of employer-sponsored programs on reducing VMT has been included in the updated guidelines. (4% increase in VMT reduction)
- Additional programs have been implemented to further reduce VMT. (2% increase in VMT reduction)

_References:
ATTACHMENT B
## TDM STRATEGY EVALUATION - DRAFT V.0

### Relevant Strategies for Implementation in SBCTA Jurisdictions Due to Land Use Context

<table>
<thead>
<tr>
<th>CATCIDA Category</th>
<th>CATCIDA #</th>
<th>CATCIDA Strategy</th>
<th>CATCIDA Reduction</th>
<th>Strength of Substantial Evidence for S&amp;A Impact</th>
<th>Literature or Evidence Online</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1.46</td>
<td>NRT Increases Teleworking and Accomplish Work Schedules</td>
<td>95% 10% commute NRT reduction due to reduced commute trips</td>
<td>Adequate Effectiveness in building NRT capacity. In-vehicle study and NRT implementation in 2010.</td>
<td><a href="http://example.com/strategy1">URL</a></td>
</tr>
<tr>
<td></td>
<td>2.3</td>
<td>NTI Liberal Role Sharing Program</td>
<td>45% commute NTI reduction due to employer site share cost savings and benefits</td>
<td>Adequate Effectiveness in building NTI capacity. In-vehicle study and NTI implementation in 2010.</td>
<td><a href="http://example.com/strategy2">URL</a></td>
</tr>
<tr>
<td></td>
<td>3.4</td>
<td>MTI Flexible Role Sharing Program</td>
<td>25% commute MTI reduction due to employer site share cost savings and benefits</td>
<td>Evidence-in-depth study reduction due to employer site sharing program.</td>
<td><a href="http://example.com/strategy3">URL</a></td>
</tr>
</tbody>
</table>

**Notes:**
- NRT = Nontypical Role Sharing
- NTI = Nontypical Role Integration
- MTI = Modified TDM Implementation

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### Literature or Evidence Online

- Other resources related to TDM strategies and implementation. [URL](http://example.com/resources)
Translutions, Inc. (Translutions) is pleased to provide this memorandum discussing the background of Senate Bill 743 (SB-743) which will change transportation impacts under the California Environmental Quality Act (CEQA).

BACKGROUND

Senate Bill 743 (Steinberg, 2013), which was codified in Public Resources Code section 21099, required changes to the guidelines for implementing CEQA (CEQA Guidelines) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. As one appellate court recently explained: “During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy . . .” (Covina Residents for Responsible Development v. City of Covina (2018) 21 Cal.App.5th 712, 729.) Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (Id., subd. (b)(1); see generally, adopted CEQA Guidelines, § 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (Agency) has certified and adopted, changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project’s transportation impacts. With the California Natural Resources Agency’s certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by “level of service” and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).)

It should be noted that SB 743 (the legislation) does not specify any screening thresholds or impact criteria for transportation impacts using VMT. In fact, the legislation does not even specify VMT as the metric – but directs the OPR to identify the appropriate metric. The OPR evaluated several metrics including VMT, Automobile Trips Generated, Multimodal LOS, Fuel Use, and Motor Vehicle Hours Traveled, and ultimately settled on VMT. SB 743 includes legislative intent to help guide the development of the new criteria for transportation impacts to align with Green House Gas (GHG) reduction. For example, Section 1 of the legislation states: “New methodologies under the California Environmental Quality Act are needed for evaluating transportation impacts that are better able to promote the state’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations.” Further, subdivision (b) of the new Section 21099 requires that the new criteria “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.”

OPR’S TECHNICAL ADVISORY

To assist in the process, the OPR released several technical advisories. The technical advisory states that “…(it) is one in a series of advisories provided by the Governor’s Office of Planning and Research (OPR) as a service to professional
planners, land use officials, and CEQA practitioners. OPR issues technical assistance on issues that broadly affect the practice of land use planning and the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). (Gov. Code, § 65040, subds. (g), (l), (m).) The purpose of this document is to provide advice and recommendations, which agencies and other entities may use at their discretion. This document does not alter lead agency discretion in preparing environmental documents subject to CEQA. This document should not be construed as legal advice.” Therefore, the OPR agrees and recommends that lead agencies choose and implement their thresholds.

SCREENING THRESHOLDS RECOMMENDED BY OPR

Many agencies use “screening thresholds” to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. (See e.g., CEQA Guidelines, §§ 15063(c)(3)(C), 15128, and Appendix G.) As explained below, this technical advisory suggests that lead agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing. The Technical Advisory recommends the following thresholds:

Screening Threshold for Small Projects. Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact.

Analysis. To set this 110-trip threshold, the OPR uses a CEQA exemption for additions to existing structures of up to 10,000 square feet. The Technical Advisory states, “CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact”. It should be noted that many land uses generate significantly higher trips than the 110 daily-trip threshold. For example, a 10,000 square foot Drive-In Bank generates 1,000 daily trips. Similarly, a 10,000 square foot drugstore with drive through window would generate 1,092 daily trips, and a USPS would generate 1,039 trips. Therefore, there are many land-uses where the 10,000 square foot exemption would result in substantially higher trips than the 110-trip threshold used by the OPR.

Recommendation. Based on the intent and stated goals of SB-743, the City has evaluated land uses in the City from a GHG emissions perspective. In San Bernardino County, there are two Air Quality Management Districts – the Mojave Desert AQMD (MDAQMD) and the South Coast AQMD (SCAQMD). The MDAQMD uses a threshold of 100,000 Metric Tons (MT) of CO2 Equivalents (CO2e) per year as a threshold to identify significant impacts1. The SCAQMD in its "Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans"1 recommends a screening threshold of 3,000 MT of CO2e per year for residential and commercial sectors and 10,000 MT of CO2e per year for industrial projects.

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1 MDAQMD California Environmental Quality Act (CEQA) And Federal Conformity Guidelines (http://www.mdaqmd.ca.gov/home/showdocument?id=538)
Memorandum:  VMT Screening Thresholds  
City of Victorville

Understanding that although the City is in the MDAQMD area, the SCAQMD’s recommendations are the most stringent in San Bernardino County. Therefore, various land uses were evaluated using City specific average trip lengths by trip purpose from the San Bernardino Transportation Analysis Model (SBTAM) and evaluated in the context of the SCAQMD threshold of 3,000 MT of CO2e per annum. Table A summarizes the findings of the evaluation. The GHG emissions were calculated based on 100 units (DU or 1,000 square feet). The resulting emissions were compared to the SCAQMD threshold of 3,000 MT CO2e/year and the number of units to trigger the threshold was calculated.

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Units</th>
<th>CO2e (MT)</th>
<th>Mobile CO2e</th>
<th>Weekday Trip Generation Rate</th>
<th>Weekday Trips</th>
<th>Less Than Significant (3,000 MT of CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Family Residential</td>
<td>100</td>
<td>2.204</td>
<td>1.551</td>
<td>9.44</td>
<td>944</td>
<td>136 1,285</td>
</tr>
<tr>
<td>Multi Family (Low Rise) Residential</td>
<td>100</td>
<td>1.621</td>
<td>1.212</td>
<td>7.32</td>
<td>732</td>
<td>185 1,355</td>
</tr>
<tr>
<td>Office</td>
<td>100</td>
<td>1.321</td>
<td>828</td>
<td>9.74</td>
<td>974</td>
<td>227 2,212</td>
</tr>
<tr>
<td>Retail</td>
<td>100</td>
<td>2.463</td>
<td>1.902</td>
<td>37.75</td>
<td>3,775</td>
<td>122 4,598</td>
</tr>
<tr>
<td>Warehouse No Refrigeration, No Rail</td>
<td>100</td>
<td>3.62</td>
<td>105</td>
<td>1.74</td>
<td>174</td>
<td>299 2,242</td>
</tr>
<tr>
<td>Light Industrial</td>
<td>100</td>
<td>1.015</td>
<td>347</td>
<td>4.96</td>
<td>496</td>
<td>286 1,466</td>
</tr>
</tbody>
</table>

As seen from the above table, the following unit counts are anticipated to have less than significant impacts –

- Single Family Residential – 136 Dwelling Units
- Multi-Family (Low Rise) Residential – 136 Dwelling Units
- Office – 227,000 square feet
- Retail – 122,000 square feet
- Warehousing – 829,000 square feet
- Light Industrial – 296,000 square feet

For land uses not included in the table above, the most restrictive daily trip threshold (1,285 trips) from the table above could be used at the City Engineers’ discretion.