Appendix H-2

Joshua Truck Warehouse Vehicle Miles Traveled Screening Assessment

Integrated Engineering Group

March 2026

Joshua Truck Warehouse
Vehicle Miles Traveled
Screening Assessment

Prepared by:

INTEGRATED ENGINEERING GROUP
TRANSPORTATION PLANNING AND ENGINEERING

23905 Clinton Keith Road 114-280
Wildomar, CA 92595

March 2026

1.0 INTRODUCTION

The purpose of this report is to provide a Vehicle Miles Traveled (VMT) analysis for the proposed Joshua Grading and Excavating Operations Yard project in compliance with Senate Bill 743 (SB 743) and the California Environmental Quality Act (CEQA).

Project Description

Conco Construction, for Joshua Grading and Excavating (Applicant) proposes to develop a new office and repair/storage yard for its equipment that services the Burlington Northern Santa Fe (BNSF) railroad tracks throughout the desert of Southern California on 4.79 acres (208,806 SF) of a 10-acre parcel (APN 0463-441-07) located along Tecaya Road, approximately 0.4 mile east of Dale Evans Parkway, adjacent to the south side of Quarry Road (Project**,** refer to Figure 1). The Proposed Project is within the North Apple Valley Industrial Specific Plan zone, (NAVISP) with a land use designation of Specific Plan Industrial (SP-I), and the Proposed Project is an allowed use in that zone**.**

On-site improvements include a 10,000 SF administrative building, a 10,000 SF repair shop that services its fleet passenger trucks and heavy duty equipment, a future 6,000 SF building (use to be determined) and a fueling station with one, 12,000-gallon above-ground diesel fuel tank. Off-site improvements include grading and paving of Tecaya Road beginning at Dale Evans Parkway approximately 0.5 mile long, approximately 26 feet wide, and installing curb and gutter and sidewalk only along the Project frontage, as well as would pave an approximately 26-foot wide half section of Dachshund Avenue that ends in a half cul de sac just beyond the Project frontage, with a sidewalk on the west side of the parcel frontage. The main entrance would be from Tecaya Road, and the cul de sac is meant to prohibit connection from Dachshund Avenue and Quarry Road (north boundary of the Project). Figure 2 identifies the Project site plan.

The number of employees on site would be approximately 10 to 12 daily for the office and maintenance. Another 10 to 12 employees would consist of equipment operators and/or field supervisors who would come to the site but leave with either an assigned standard pick up truck or an assigned dump truck that would be needed at a specific job location.

The Project site and the surrounding land uses are all located in the NAVISP, SP-I Land Use. The Project Site is currently a dirt lot and is vacant. Vacant lands predominantly exist in the vicinity of the Project Site, except for a single residence that lies approximately 1,600 feet to the west of the site (at the southeast corner of Quarry Road and Dale Evans Parkway) and two residences that lie approximately 2,000 feet to the southwest of the Project Site (along Cardova Road).

A trip generation assessment was conducted for the Project (refer to Attachment 1). The proposed land uses are consistent with the *Trip Generation Manual, 11th Edition*, published by the Institute of Transportation Engineers (ITE) Warehousing Land Use (150) which is primarily devoted to the storage of materials, but it may also include office and maintenance areas.

Table 1 – Project Trip Generation Summary

Land Use[1]	Intensity	Units[2]	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Warehousing	26.00	TSF	3	1	4	1	3	5	44
Vehicle Mix[3,4]									
Passenger Cars (60.0%)			2	1	3	1	2	3	27
2-Axle Trucks (2%x40%=0.8%) (PCE = 1.5)			0	0	0	0	0	0	1
3-Axle Trucks (28%x40%=11.2%) (PCE = 2.0)			1	0	1	0	1	1	10
4+-Axle Trucks (70%x40%=28%) (PCE = 3.0)			3	1	4	1	3	4	37
Total			6	2	8	2	6	8	75

1 Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

2 TSF = Thousand Square Feet

3 Recommended Vehicle Mix per City of Rialto TIA Guidelines for VMT and LOS Assessment, May 2021

4 Passenger Car Equivalent (PCE) Rates per SBCTA Guidelines, February 2020

As shown in Table 1, the calculated total Project daily trips are 75 average daily trips (ADT), including the implementation of the appropriate Passenger Car Equivalent (PCE) adjustment factor for heavy vehicles. Of the 75 daily trips (including trucks calculated as passenger car equivalents), eight would occur during the AM Peak Hour and eight during the PM peak hour.

VMT Background and Guidance Documents

Senate Bill 743

On September 27, 2013, SB 743 was signed into State law and started a process intended to fundamentally change transportation impact analysis as part of the CEQA compliance. It replaced automobile delay and Level of Service (LOS) with VMT as the primary metric to measure transportation impacts, encouraging infill development, reducing greenhouse gas emissions, and promoting multi-modal transportation. All agencies were to begin utilizing VMT analysis for CEQA beginning July 1, 2020. SB 743 also directed the Office of Planning and Research (OPR) to establish specific "criteria for determining the significance of transportation impacts of projects[.]" (Pub. Resources Code, § 21099, subd. (b)(1).) In establishing this criterion, OPR was guided by the general principles contained within CEQA, the CEQA Guidelines, and applicable case law.

VMT Methodology Guidance

This section identifies VMT guidance documents at the State, Regional and Local levels that would be applicable to this VMT analysis.

State Technical Advisory

In December 2018, OPR published the "Technical Advisory on Evaluating Transportation impacts in CEQA" (OPR, 2018) to provide advice and recommendations, which agencies and other entities may use at their discretion in establishing VMT guidelines. The OPR 2018 advisory identified methods for calculating VMT, including suggested 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.)

Local agencies have the option to use OPR's thresholds or can formally adopt their own thresholds. Pursuant to CEQA Guidelines section 15064.7, thresholds developed by jurisdictions must be adopted by ordinance, resolution, rule, or regulation. The thresholds must also be developed through a public review process, and be supported by substantial evidence. (CEQA Guidelines, § 15064.7(b).)

The technical advisory also identifes that lead agencies may use "screening thresholds" to quickly identify when a project should be expected to cause a less-than-significant impact on VMT without conducting a detailed study. The screening thresholds outlined in the OPR 2018 guidelines identifies specific criteria that includes project size, maps, transit availability, and provision of affordable housing. If those criteria are met, a project would be considered having a less than significant impact on VMT and no formal VMT analysis would be required.

San Bernardino County Transportation Impact Study Guidelines

San Bernardino County published its Transportation Impact Study Guidelines on July 9, 2019 (County 2019 Guidelines) that identified a VMT analysis methodology that is based on the OPR 2018 guidelines, noting that the San Bernardino County Transportation Authority (SBCTA) was leading an SB743 Implementation Study to further refine the methodology for the County.

The County 2019 Guidelines also included the same screening criteria as identified by the OPR 2018 technical guidance based on project size, maps, transit availability, and provision of affordable housing where if the criteria are met, a project would not undergo a formal VMT analysis.

San Bernardino County Transportation Authority

In February 2020, the SBCTA published its guidance document "Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment" (SBCTA 2020) prepared by Fehr and Peers as a resource to SBCTA member agencies. Member agencies can utilize and modify these guidelines at their discretion to assist with traffic impact analysis requirements.

The SBCTA 2020 guidelines identifies that a VMT analysis should be conducted for land use projects as deemed necessary by the Traffic Division and would apply to projects that have the potential to increase the average VMT per service population (e.g. population plus employment) compared to the SBCTA region or the lead agency boundary. Normalizing VMT per service population essentially provides a transportation efficiency metric that the analysis is based on. Using this efficiency metric allows the user to compare the project to the remainder of the unincorporated area for purposes of identifying transportation impacts. The guidelines are based on the SBCTA SB 743 Implementation Study which provides options for both methodologies and VMT screening. The methodologies and significance thresholds presented below are based on SBCTA recommendations from the Implementation Study. The SBCTA 2020 guidelines allow lead agencies to modify these thresholds with alternative thresholds of significance and methodologies as appropriate.

The SBCTA 2020 guidelines also included the same screening criteria as identified by the OPR 2018 technical guidance based on project size, maps, transit availability, and provision of affordable housing, where if the criteria are met, a project would not undergo a formal VMT analysis.

Town of Apple Valley

In May 2021, the Town of Apple Valley adopted Resolution 2021-08 (Town Resolution 2021) that adopted thresholds of significance for VMT analysis in the Town. The Town Resolution 2021 identified that the VMT methodology for the Town would be the Origin/Destination method because it provided a more complete capture of all travel (car and truck trips) within the study area, including trips that may begin or end outside of the study area.

The Town Resolution 2021 also states that the VMT per service population is utilized to normalize VMT into a standard unit for comparison purposes while accounting for the population and/or employment in a given area. Further, the Town Resolution 2021 identifies that the comparison value is general plan buildout because the general plan was adopted through a public process to reflect the goals and values of the Town. The Town's general plan, adopted in 2009, includes policies and actions to facilitate infill development, a multi-modal transportation network, energy and resource efficient practices, and a reduction of greenhouse gas emissions.

Under Town Resolution 2021, a project would result in a significant project-generated VMT impact if either of the following conditions are satisfied:

1. The baseline project-generated VMT per service population exceeds the Town of Apple Valley General Plan Buildout VMT per service population, or
2. The cumulative project-generated VMT per service population exceeds Town of Apple Valley General Plan Buildout VMT per service population.

A project's effect on VMT would be considered significant if it resulted in either of the following conditions to be satisfied:

1. The baseline link-level boundary Town-wide VMT per service population increases under the plus project condition compared to the no project condition, or
2. The cumulative link-level boundary Town-wide VMT per service population increases under the plus project condition compared to the no project condition.

Town Resolution 2021 does not address any screening criteria as identified by the OPR 2018 technical guidance or the SBCTA 2020 guidance document that identifies that various projects may be screened out of a VMT analysis using project size, maps, transit availability, and provision of affordable housing.

The ordinance also does not prohibit the use of screening criteria from other agencies.

City of Victorville

As the City of Victorville (City) is adjacent to the west of the Town of Apple Valley and has similar demographics, the City of Victorville VMT standards could also be considered as guidance for VMT analysis.

The City adopted Resolution 20-010 on June 16, 2020 which set thresholds for VMT analysis as well as identified screening criteria to be used to screen a project out of conducting a full analysis (Victorville Resolution 20-010). In developing its criteria, the City worked with the SBCTA and its

traffic consultants Fehr and Peers and Translutions to update the City's method to analyze traffic impacts. The staff report included in the City's adoption of Resolution 20-010 states that "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." Therefore, because the City's VMT screening guidelines constitute substantial evidence and the City is similar in location and demographics to the Town, the City's VMT guidelines with respect to the screening criteria could be utilized to assess the Project.

2.0 Analysis Methodology

Screening Criteria Assessment
The purpose of this section is to identify VMT screening criteria that have been adopted by other agencies that could be applied to the Project.

Many agencies have adopted "screening thresholds" to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. This is allowed by CEQA Guidelines, §§ 15063(c)(3)(C), 15128, and Appendix G.

The Town of Apple Valley did not adopt screening criteria, but the Town's ordinance also does not prohibit the use of screening criteria as long as the screening thresholds are based on substantial evidence, which is required by CEQA. Therefore, a project in the Town could potentially utilize screening thresholds developed by other agencies to determine if a project could screen out of a VMT analysis.

This section identifies the various screening criteria thresholds as adopted by various agencies in the County and in the region of the Town.

SBCTA Screening Criteria
The SBCTA 2020 guidelines recognizes, similar to the Town Resolution 2021 language, that normalizing VMT per service population essentially provides a transportation efficiency metric that the analysis is based on. Using this efficiency metric allows the user to compare the project to the remainder of the unincorporated area for purposes of identifying transportation impacts. Therefore, the SBCTA 2020 guidelines recognizes a methodology concept that is most similar to the Town of Apple Valley's VMT guidelines intent.

The SBCTA 2020 guidelines also include screening criteria that detail the requirements for the project's VMT analysis consistent with CEQA including three (3) types of screening to determine if a project could be screened out from conducting a detailed project level VMT analysis. Per the Guidelines, projects that do not meet any of the screening criteria identified would need to perform a VMT analysis. The project would need to evaluate the appropriate VMT metrics and compare them to the identified thresholds to determine the level of significance as defined per the Guidelines.

Because the SBCTA's methodology's guiding principal is similar to that required by Town Resolution 2021, the screening criteria provided in the SBCTA 2020 guidelines could be used. The screening criteria are as follows:

- **Transit Priority Area (TPA) Screening**: Projects located within a TPA may be presumed to have a less than significant impact absent substantial evidence to the contrary.
- **Low VMT Area Screening:** Residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area.

- **Project Type Screening:**
    a. Local serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel.
    b. In addition to local serving retail, the following uses can also be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are local serving in nature:
        i. Local-serving K-12 schools
        ii. Local parks
        iii. Day care centers
        iv. Local-serving gas stations
        v. Local-serving banks
        vi. Local-serving hotels (e.g. non-destination hotels)
        vii. Student housing projects on or adjacent to college campuses
        viii. Local-serving assembly uses (places of worship, community organizations)
        ix. Community institutions (Public libraries, fire stations, local government)
        x. Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
        xi. Affordable or supportive housing
        xii. Assisted living facilities
        xiii. Senior housing (as defined by HUD)
        xiv. Projects generating less than 110 daily vehicle trips.[1] This generally corresponds to the following "typical" development potentials:
            - 11 single family housing units
            - 16 multi-family, condominiums, or townhouse housing units
            - 10,000 sq. ft. of office
            - 15,000 sq. ft. of light industrial
            - 63,000 sq. ft. of warehousing
            - 79,000 sq. ft. of high cube transload and short-term storage warehouse

[1] This threshold ties directly to the OPR technical advisory and notes that 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.

Project Applicability under SBCTA Guidelines Screening Criteria

TPA and Low VMT Area
Not Applicable. The project location is neither in a TPA nor in a low VMT generating area. Therefore, the Project would not qualify under this screening criterion.

Project Type
Applicable. The Project would construct approximately 26,000 SF of building area that would be equivalent to a warehouse. As such, the Project would be applicable under Project Type for being under "63,000 sq. ft. of warehousing."

Additionally, as shown in the trip generation analysis (**Table 1)**, the calculated total Project daily trips are 75 ADT, including the implementation of the appropriate Passenger Car Equivalent (PCE) adjustment factor for heavy vehicles. However, it should be noted that the intent of SB 743 and VMT analysis under CEQA is to evaluate VMT generated by automobiles, which the Governor's Office of Planning and Research (OPR) defines as "on-road passenger vehicles, specifically cars and light trucks."[2] The total daily trips from passenger vehicles, excluding truck trips, is 27 ADT.

Therefore, the Project qualifies under "Projects generating less than 110 daily vehicle trips.";

Therefore, under the SBCTA 2020 guidelines, the Project would be screened out of performing a VMT analysis under the Project Type category.

City of Victorville
In an effort to ensure that substantial evidence is provided to justify the use of a screening method for the Project that is not contained in the Town's ordinance, the City of Victorville's guidelines as outlined in Victorville Resolution 20-010 were also utilized.

As stated in the Victorville Resolution 20-010, OPR established a recommended screening threshold of 110 daily trips, based on the daily traffic generated by a 10,000-square-foot office building, which qualifies as an existing CEQA categorical exemption. The OPR Technical Advisory notes that "CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, provided the project is located in an area where public infrastructure is available to accommodate the maximum planned development and the project is not located in an environmentally sensitive area." (CEQA Guidelines §15301(e)(2)). However, the City of Victorville determined that reliance on this categorical exemption as a VMT screening threshold does not clearly establish a nexus to greenhouse gas (GHG) emission reductions, which is a core objective of SB 743.

Consistent with the intent of SB 743 to promote GHG reduction, the City supported the development of alternative screening thresholds based on GHG emissions, supported by an extensive study prepared May 21, 2020, prepared by Translutions, Inc., titled "Screening Criteria for Vehicle Miles Traveled" (Translutions 2020, refer to Attachment 2). This analysis provides justification for daily trip and land use screening thresholds based on the metric tons of CO_2 equivalent per year used by regional air quality management districts to determine whether a project would result in a significant air quality impact. Documentation supporting this

[2] OPR Technical Advisory (December, 2018) Page 4 – "Vehicle Types"

methodology is provided in **Attachment 2**, which establishes screening thresholds that maintain a clear nexus to GHG reduction.

Based on Translutions, Inc.'s evaluation, the following screening criteria was developed for the City:

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 development 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 methods would be used.

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.

Project Applicability under the City of Victorville Guidelines Screening Criteria

Daily Vehicle Trip Thresholds
Applicable. As identified by the Trip Generation, the Project is anticipated to generate approximately 110 trips per day, which is much less than the City's threshold of 1,285 trips per day. Therefore, the Project qualifies under the City's Daily Vehicle Trip Threshold for screening out of a VMT analysis.

Land Use Types

Applicable. The 26,000 SF of building space proposed by the Project qualifies the project type as a warehouse with less than 829,000 SF.

Therefore, under the City Victorville Resolution 20-010 guidelines, the Project would be screened out of performing a VMT analysis based on Daily Vehicle Trip Thresholds and Land Use Types.

3.0 VMT Impact Assessment Conclusion

As the Town does not have VMT screening guidelines and project screening is allowed by the OPR guidance, it is appropriate to look into VMT guidelines used by other agencies provided that the screening criteria is supported by substantial evidence.

The Project has found to meet the screening criteria of the following commonly accepted guidance:

SBCTA 2020 (which follows the OPR 2018):

Project Type:

- Warehouse – 63,000 SF. The Project would construct an equipment yard with approximately 26,000 SF of building area that would be equivalent to a warehouse under the ICT manual.

- Projects Generating Less than 110 Trips – the Project would generate 27 passenger vehicle ADT.

City of Victorville:

- Daily Trip Threshold of 1,285 - the Project would generate 27 passenger vehicle ADT.

- Land Use Type
    - Warehousing – 829,000 SF – The Project would construct an equipment yard with approximately 26,000 SF of building area that would be equivalent to a warehouse under the ICT manual.

It should be noted that a 2025 California Court of Appeal ruling in *Cleveland National Forest Foundation v. County of San Diego* invalidated the County's 2022 vehicle miles traveled (VMT) screening thresholds, ruling they were not supported by substantial evidence. The court found the County improperly adopted thresholds for "small projects" and "infill areas" without proving they fit local conditions. The County had been using these thresholds to streamline housing projects, with roughly 29 applications and 1,000 units in the pipeline before the ruling.

The Court rejected the County's reliance on OPR's recommendation, reasoning that the OPR's small-project advice "was developed by evaluating projects across the State and was not developed based on a single jurisdiction." Therefore, the court held that the County did not properly adopt OPR's recommended threshold without assessing, based on substantial evidence, whether it was appropriate and useful for application in the specific local or regional conditions pertaining to the project undergoing review by the County.

The lawsuit identified that local agencies should not rely exclusively on OPR recommendations in adopting VMT screening thresholds, but should perform a local or regional-specific analysis of whether such projects would generally result in an insignificant transportation effect, even if they do not always do so.

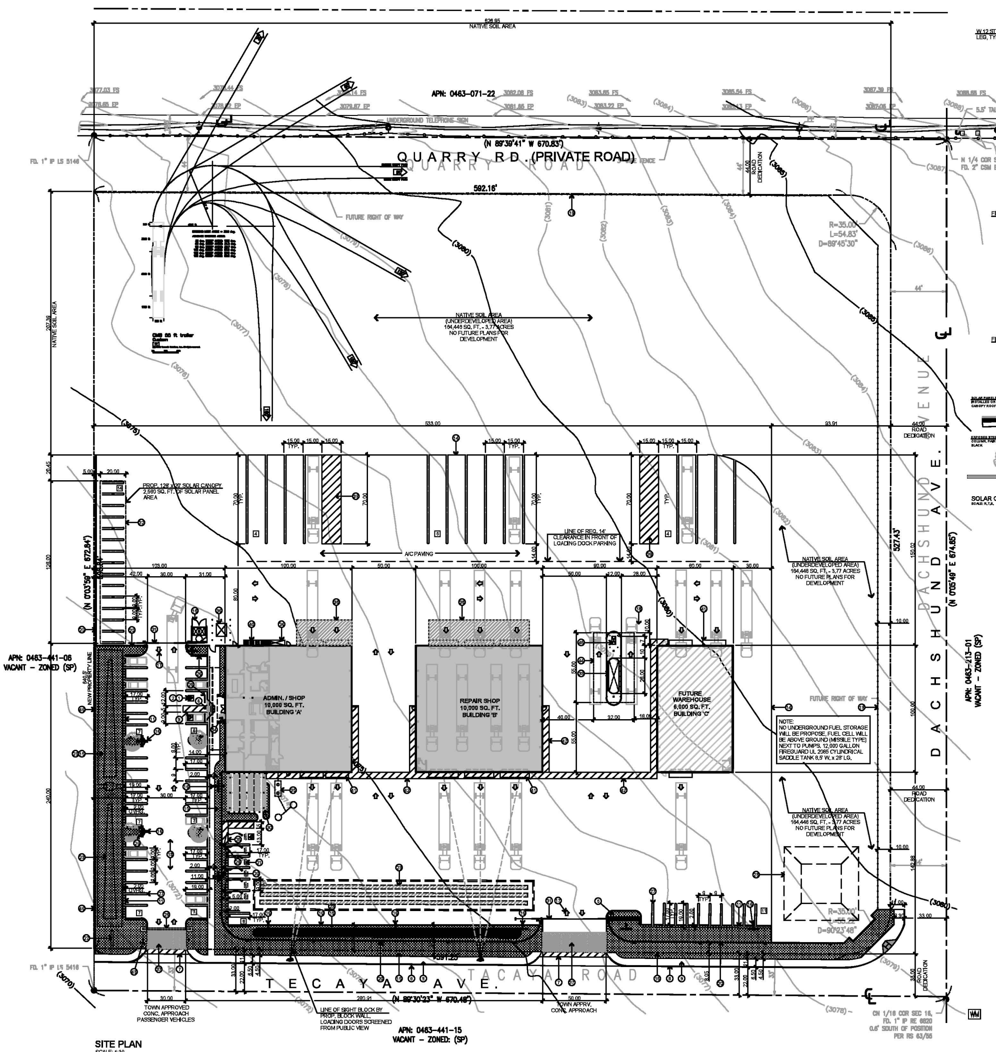
However, the City of Victorville did conduct an extensive study that focused on the conditions specific to the City and the applicable air district (refer to Translutions 2020, Attachment 2). Therefore, as the City of Victorville is adjacent to the Town of Apple Valley and has similar demographics and land uses, and is within the same air quality management district, the use of the City of Victorville's screening criteria could be cited as substantial evidence to support use of the screening criteria for the Project.

Therefore, based on the City of Victorville's screening criteria, the proposed Joshua Grading and Excavating Operations Yard Project would not have a significant impact on VMT and require no further analysis.

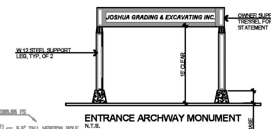
Should you have any questions, please feel free to contact at:
Email: george@intenggroup.com
Phone: (951) 239-1546
Address: 23905 Clinton Keith Road 114-280
Wildomar CA, 92595

Attachment 1 – Project Site Plan
Attachment 2 – City of Victorville Resolution No.20-031 (refer to Attachment D for the Translutions Report)

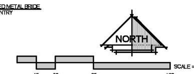
Attachment 1 – Project Tentative Tract Map

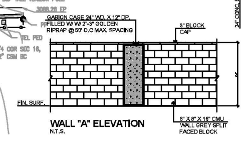


SITE PLAN
SCALE: 1:30

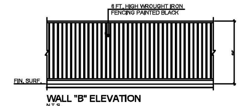


ENTRANCE ARCHWAY MONUMENT
N.T.S.

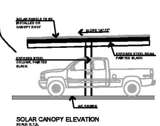




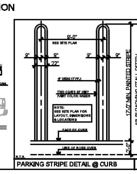
WALL "A" ELEVATION
N.T.S.



WALL "B" ELEVATION
N.T.S.

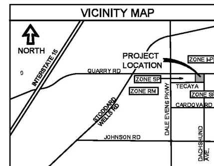


SOLAR CANOPY ELEVATION
SCALE: N.T.S.



PARKING STRIPE DETAIL @ CURB | 1

VICINITY MAP



PROJECT DATA

APPLICATION TYPE:	SITE PLAN REVIEW/ CUP
ZONE:	SP
OCCUPANCY'S:	B/S-1
CONSTRUCTION TYPE:	II - B
STORIES:	1
FIRE SPRINKLERS:	YES
BUILDING HEIGHT:	BUILDING 'A' - ADMIN / SHOP 31'-0" BUILDING 'B' - REPAIR SHOP 31'-0" BUILDING 'C' - FUTURE BODY SHOP 27'-6"

APPLICANT / OWNER:
CONCO CONSTRUCTION
(760) 247-5514
SDENMARK@CONCO-CONSTRUCTION.COM

ARCHITECT / REPRESENTATIVE:
STEENO DESIGN STUDIO, INC.
ARCHITECT: TOM STEENO
11774 HESPERIA RD. SUITE B-1
PH: 760.244.5001 FX: 760.244.1948

SCOPE OF WORK

TO CONSTRUCT ONE (1) 10,000 SQ. FT. OF TRUCK SERVICE SHOP METAL BUILDING WHICH INCLUDES A 3,499 SQ. FT. OFFICE AREA AND 6,501 SQ. FT. OF SERVICE AREA, (1) SEPARATE 10,000 SQ. FT. OF TRUCK REPAIR SHOP METAL BUILDING W/ 3 SERVICE BAYS, (1) FUTURE 6,000 SQ. FT. OF WAREHOUSE METAL BUILDING AND A DIESEL FUELING WITH 2 FUELING PUMPS.

NOTE

LAND COVERAGE SHALL HAVE A MINIMUM OF 5% LANDSCAPE REQUIRED .

SITE DATA

A.P.N: 0463-441-07

LEGAL DESCRIPTION:
NE 1/4 NE 1/4 NW 1/4 SEC 16 TP 6N R 3W EX MNL RTS RESERVATION OF RECORD 10 AC

SITE AREA

AREA	SQ. FOOTAGE
GROSS LAND AREA (10 AC.)	435,600 S.F.
NET LAND AREA (8.57 AC.)	373,440 S.F.
NOT A PART (ROAD DEDICATION) (1.43 AC.)	62,160 S.F.
AREA OF DEVELOPMENT	208,806 S.F.
UNDEVELOPED AREA	164,634 S.F.

PROPOSED LAND AREA & COVERAGE (EXCLUDING AREA NOT PART OF PROJECT)

AREA	SQ. FOOTAGE	% COVERAGE OF NET LAND
BUILDING AREA (TOTAL FOOTPRINT)	26,000	7.0%
A/C PAVING	161,096	43.1%
CONCRETE HARDSCAPE & CURBING	2,153	0.6%
LANDSCAPED AREA	19,557	5.2%
UNDEVELOPED AREA	164,634 S.F.	44.1%
TOTAL PROJECT NET LAND AREA COVERAGE =	373,440	100%
LANDSCAPED AREA (BEYOND PROPERTY LINE)	1,425	NOT A PART

PARKING DATA

REQUIRED PARKING PER G.F.A.

AREA	RATIO	S.F.	# SPACES
BUILDING 'A'			
SHOP (2 SERVICE BAYS)	3/BAY	6,501	6
OFFICE AREA	1:250	3,499	14
BUILDING 'B' SHOP (3 SERVICE BAYS)	3/BAY	10,000	9
BUILDING 'C' FUTURE SHOP (2 SERVICE BAYS)	3/BAY	6,000	6
TOTAL REQUIRED		=	35

PROVIDED PARKING:

9'x19' ACCESSIBLE PARKING STALLS	=	2 SPACES
9'x19' STANDARD PARKING STALLS	=	56 SPACES
9'x19' STANDARD PARKING STALLS UNDER SOLAR CANOPY	=	14 SPACES
9'x19' STANDARD EV PARKING STALLS W/ EVSE	=	1 SPACES
9'x19' VAN ACC. EV PARKING STALLS W/ EVSE	=	1 SPACES
TOTAL PROVIDED	=	**74 SPACES**
15' x 70' TRUCK PARKING	=	13 SPACES

APPLE VALLEY UTILITIES

WATER:
APPLE VALLEY RANCHOS WATER CO.
21760 OTTAWA RD.
APPLE VALLEY, CA 92307
760-247-6484

ELECTRIC:
SOUTHERN CALIFORNIA EDISON CO. 12353 HESPERIA RD. 92376
(909) 951-3237

GAS:
SOUTHWEST GAS CO.
13471 MARIPOSA ROAD
VICTORVILLE CA. 92392
(760) 951-4055

DISPOSAL:
BURTEC WASTE INDUSTRIES INC.
17080 STODDARD WELLS RD.
VICTORVILLE, CA 92394
760-245-8607

KEYED NOTES

1. VAN ACCESSIBLE PARKING SPACE
2. ACCESSIBILITY STALL EMBLEM PAINTED AS SHOWN
3. 5' WIDE ACCESSIBILITY ACCESS W/ BLUE STRIPES
4. A.D.A. RAMP NOT TO EXCEED 5% SLOPE IN DIRECTION OF RUN AND 2% MAX CROSS SLOPE
5. WARNING SIGNAGE REGARDING UNAUTHORIZED USE OF DISABLED PARKING SPACES
6. TRUNCATED DOMES, 36" DEPT x WIDTH OF RAMP
7. A.D.A. PATH OF TRAVEL
8. PROP. CONC. CURB & GUTTER PER CITY/COUNTY STANDARDS
9. PROP. 6.50' WD. CONC. SIDEWALK PER CITY/COUNTY STANDARDS
10. 6" WIDE CONCRETE CURB.
11. 6" WIDE CONCRETE CURB. W/ 2' PARKING NOSE OVER
12. 4" NOMINAL THICK CONCRETE WALKWAYS
13. PROPOSED 6" THK. A.C. PAVING
14. EDGE OF PROPOSED A.C. PAVEMENT
15. LANDSCAPED AREA SEE LANDSCAPE PLANS
16. 20' HI SITE LIGHT STANDARD, SEE PLAN FOR NUMBER OF HEADS
17. TRAFFIC FLOW DIRECTIONAL ARROWS PAINTED ON PAVING
18. 12.33' SQ. x 6' HI. ACCESSIBLE TRASH ENCLOSURE
19. 6' HI. CHAIN LINK FENCING
20. 6 FT. HIGH MASONRY WALL W/ GABION CAGE SPACE 50' O.C. MAX., SEE WALL ELEVATION 'A' THIS SHEET
21. PROVIDE (2) DESIGNATED PARKING STALL FOR FUEL EFFICIENT VEHICLES WITH THE WORDS "CLEAN AIR VEHICLE" PAINTED IN THE SAME STALL STRIPING PAINT & SUCH THAT THE LAST WORD ALIGNS WITH THE END OF THE STALL STRIPING AND IS VISIBLE BENEATH A PARKED VEHICLE.
22. PROP. MONUMENT SIGN, UNDER SEPARATE PERMIT
23. PROP. BELOW GRADE RETENTION BASIN - SEE CIVIL DRAWINGS
24. 2500 AMP EXTERIOR MOUNT WEATHER-PROOF ELECTRICAL SWITCHGEAR. NOT SCREENING REQUIRED SINCE PROPOSED SWITCHGEAR IS IN THE BACK OF THE BUILDING.
25. CONCRETE WHEEL STOP PER CITY STANDARD
26. 12" WIDE STEPPING STRIP COMBINE W/ 6" CURB (18" WD. MONO POUR)
27. PAINTED PARKING HAIRPIN STRIPE.
28. EV CHARGING STATION EQUIPMENT
29. 15' HIGH CLEAR ENTRANCE ARCHWAY MONUMENT
30. TRELLIS COVERING FOR OUTDOOR PATIO
31. 6' HIGH WROUGHT IRON ROLLING GATE COLOR BLACK W/ VISION BLOCK
32. PROP. 128' x 20' SOLAR PARKING CANOPY SEE ELEVATION ABOVE 2,560 SQ. FT.
33. 12,000 GALLON FIREGUARD UL 2085 CYLINDRICAL SADDLE TANK 8.5' W. X 28' LG.
34. PROVIDE PERMANENTLY ANCHORED BICYCLE RACKS WITHIN 200 FT. OF THE VISITORS' ENTRANCE, READILY VISIBLE TO PASSERS BY, FOR 5% OF NEW VISITOR MOTORIZED VEHICLE PARKING SPACES BEING ADDED, WITH A MIN. OF (1) TWO-BIKE CAPACITY RACK.
35. 1500 GAL SEPTIC SYSTEM
36. ELECTRICAL TRANSFORMER W/ 6"Ø STEEL BOLLARDS
37. INTERLOCKING PAVERS AT PROJECT ENTRY CROSSWALKS MINIMUM OF 15 FEET IN WIDTH TO REFLECT MAJOR INTERSECTION TREATMENTS.
38. SCORE CONCRETE @ TRUCK BAY ENTRANCES
39. LOADING ZONE / OFF-STREET LOADING MIN. OF 15' x 50'
40. MECHANICAL COND. UNITS ON TOP OF MECHANICAL CANOPY IN THE BACK OF PROPOSED BUILDING. NOT VISIBLE FROM THE PUBLIC RIGHT OF WAY.
41. METAL SHADE CANOPY W/ DIAGONAL SUPPORTS COLOR - BLACK
42. PROPOSED 5' W. PATH OF TRAVEL BETWEEN BUILDINGS
43. PROPOSED UP LIGHT TO ILLUMINATE ENTRY MONUMENT
44. LINE OF PROPOSED 32' x 55' DIESEL PUMP CANOPY
45. DIESEL FUEL DISPENSER
46. 12" WIDE CONCRETE CURB.

STEENO DESIGN STUDIO INC.
ARCHITECTURE • DESIGN • PLANNING
11774 HESPERIA ROAD, SUITE B • HESPERIA CA. 92345
PHONE (760) 244-5001 • FAX (760) 244-1948
www.steenodesign.com

DATE FINISHED
APRIL 2025

REVISIONS
08-20-2025_PLANNING

THESE PLANS SHALL COMPLY WITH THE 2022 CALIFORNIA BUILDING CODE WHICH ADOPTS THE 2022 CMC, 2022 CPC, 2022 CEC, 2022 CFC, 2022 CGC AND THE 2022 ENERGY STANDARDS

LICENSED ARCHITECT THOMAS R. STEENO C26448 REN. 2/28/27 STATE OF CALIFORNIA

CONCO Const. ENGINEER, DESIGN & BUILD, INC.

PROJECT: COMMERCIAL DEVELOPMENT

JOSHUA GRADING & EXCAVATING

PROJECT LOCATION:
TECAYA AVE.
APPLE VALLEY, CA 92307
APN: 0463-441-07

CONTACT INFO:
SHANNON DENMARK
TEL: (760) 247-5514
EMAIL: SDENMARK@CONCO-CONSTRUCTION.COM

JOB NO.
C24-A33

SHEET NAME:
SITE PLAN

PAGE
A-0

Attachment 2 – City of Victorville Resolution No.20-031

CITY OF
VICTORVILLE

(760) 955-5000
E-mail: vville@victorvilleca.gov
14343 Civic Drive
P.O. Box 5001
Victorville, CA 92393-5001

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 Translutions, 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 (Attachement 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

FINANCE USE ONLY

Additional Appropriation:	Additional Revenue:
Yes ☐ $_____	Yes ☐ $_____
No ☒	No ☒
Finance Analyst: KS	
Deputy CM/Treasurer: _____	

CITY COUNCIL STAFF REPORT

ATTACHMENT A

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 I, 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 I, 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).

CITY COUNCIL STAFF REPORT

ATTACHMENT B

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

Excerpt from the May 27, 2020 Special Planning Commission Meeting

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 **AGENDA NO. 1**

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 Translutions 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 Translutions, 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 HQTA'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. Translutions, 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 Translutions, 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

THE STAFF RECOMMENDATION MAY BE ACCEPTED OR REJECTED BY THE PLANNING COMMISSION AND THE CITY COUNCIL AFTER ITS OWN ANALYSIS AND CONSIDERATION OF PUBLIC TESTIMONY PRESENTED AT THE HEARING. THE PLANNING COMMISSION ACTION IS A RECOMMENDATION TO THE CITY COUNCIL ONLY.

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 I, 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.

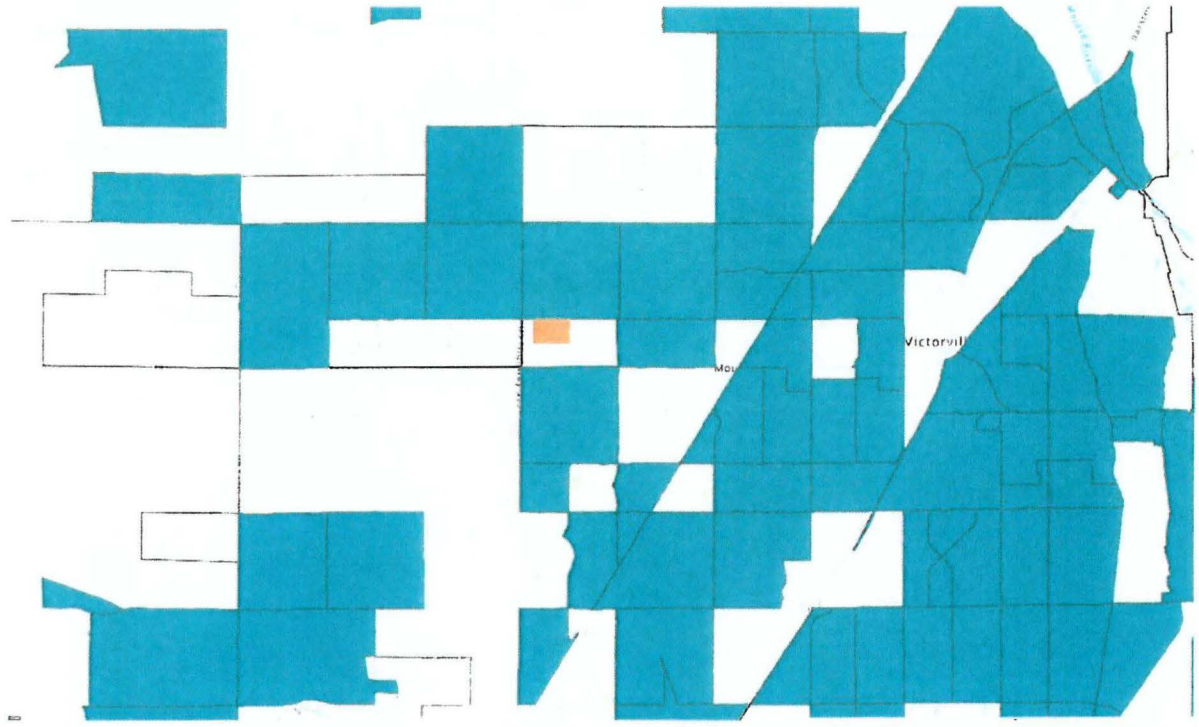
Benchmark
The benchmark used will be the City Limits as the boundary.

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.

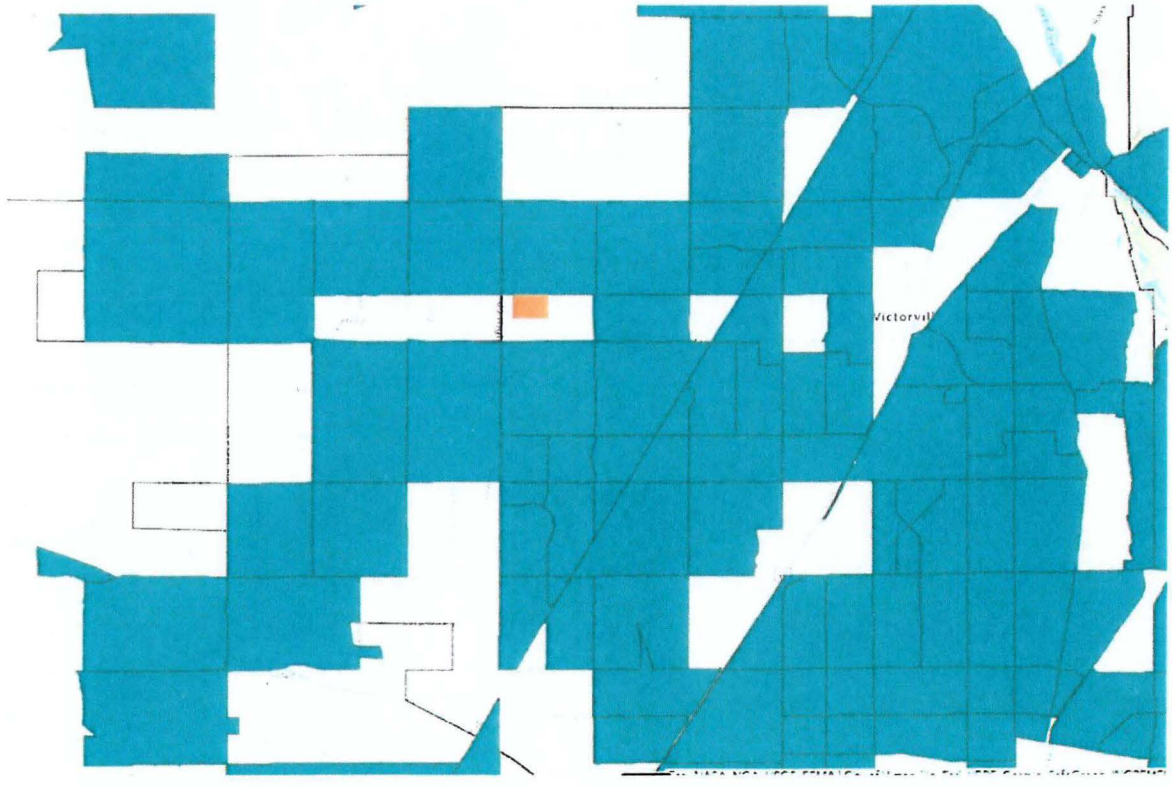
Level of Service Analysis (LOS)
LOS analysis thresholds identified in the City's General Plan and Traffic Impact Analysis guidelines will continue to be used to analyze traffic impacts, in addition to VMT impact analysis.

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).

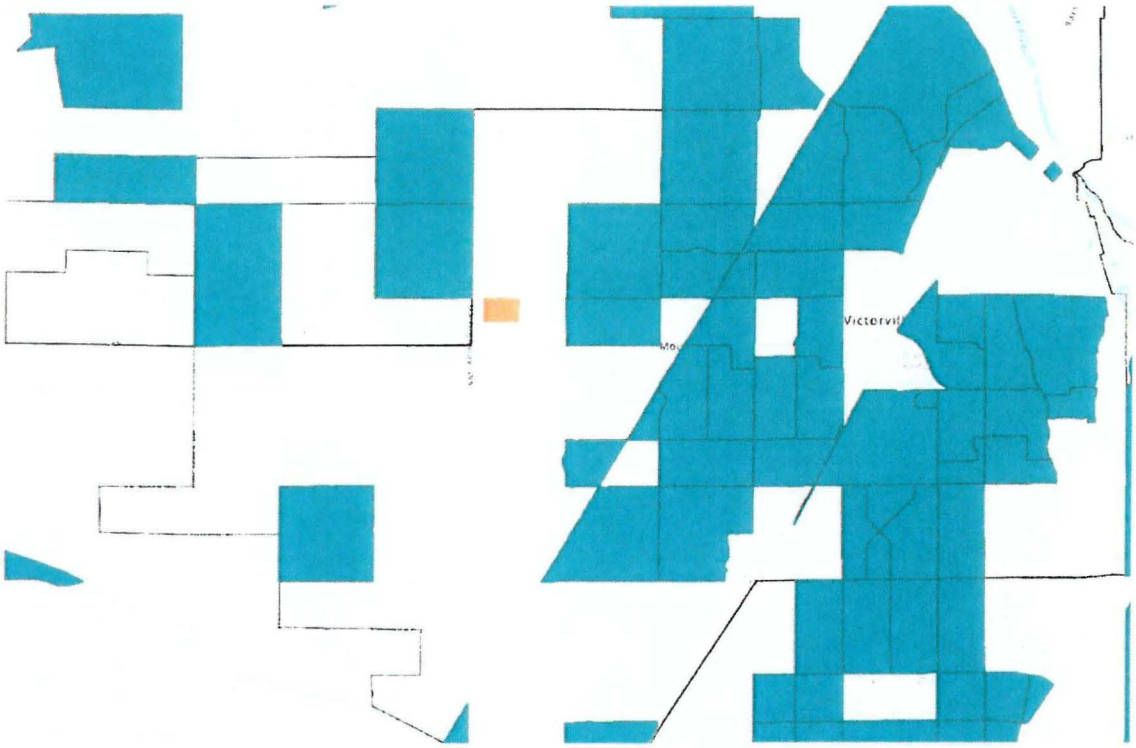
ATTACHMENT 'B'



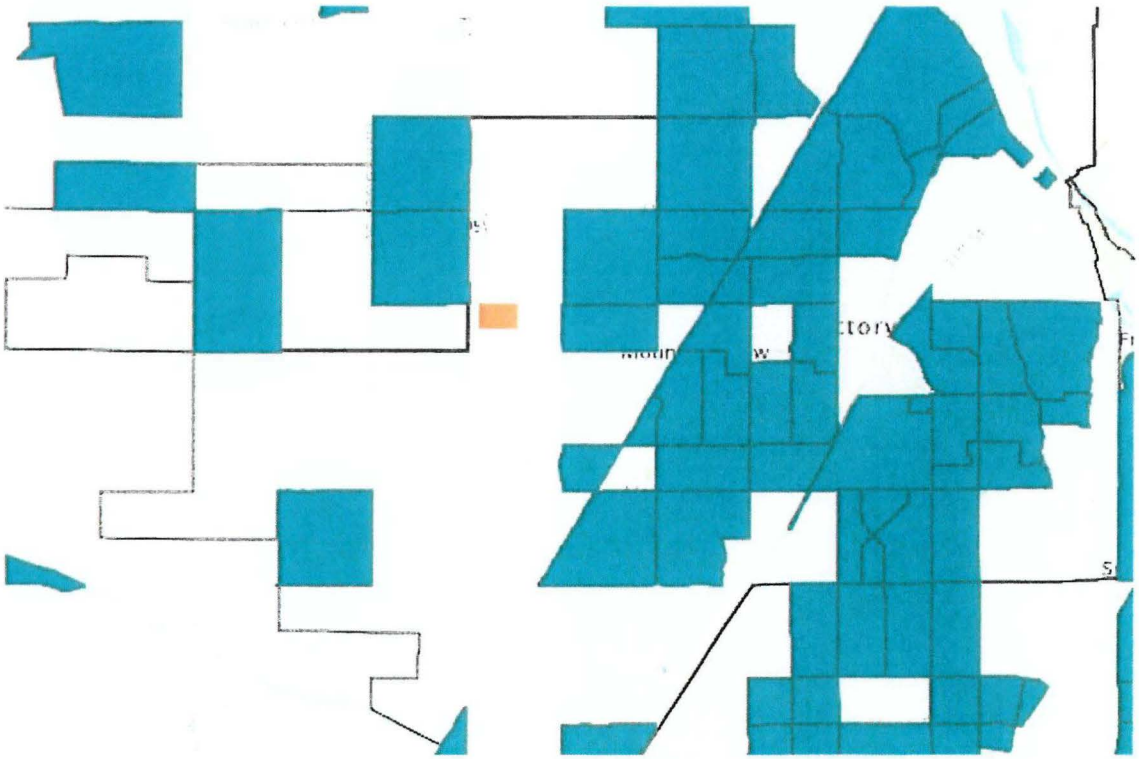
0% Baseline at Existing Conditions Option #4 (Shaded TAZs include Low VMT exempt areas)



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

Topic Area	Decision	Notes
STEP 01 Project Screening Criteria: Daily Trip Threshold	☐ **Yes** – Include • How many trips per day? ☐ ☐ • Instead of trip-based, VMT-based ☐ **No** – Do not include	OPR recommends a threshold of **110** 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.
STEP 02 Project Screening Criteria: Land Use Types	☐ **Any changes** (subtractions or additions) to current list: • Local serving retail (50 ksf or less) • K-12 Public School • Daycare/Childcare/Pre-K • Affordable housing • Student Housing • Community Institutions (Public Library, Fire station, Local Government	Any land use types that are local serving in your community should be considered for this screening. **List changes here:**
STEP 03 Project Generated VMT Methodology: PA or OD	☐ **PA** – Productions/Attractions ☐ **OD** – Origin/Destination ☐ **Both** – PA when single use and OD when mixed use	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 trip 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).
STEP 04 Project Generated VMT Methodology: Benchmarks	☐ **City** ☐ **County**	Each City must choose their appropriate boundary for a regional benchmark for all impacts.
STEP 05 Project Generated VMT Methodology: Threshold Options	☐ **OPTION 1** – Rely on the OPR Technical Advisory Thresholds (**15%** Below Existing) ☐ **OPTION 2** – Set Thresholds Consistent with Lead Agency Air Quality, GHG Reduction, and Energy Conservation Goals (**14.3%** Below Existing) ☐ **OPTION 3** – Set Thresholds Consistent with RTP/SCS Future Year VMT Projections by Jurisdiction or Sub-Region (Better than General Plan Buildout) ☐ **OPTION 4** – Set Thresholds Based on Baseline VMT Performance (Better than Existing)	See SBCTA SB 743 Implementation Thresholds Assessment dated 11/11/19 for more information.
STEP 06 Level of Service (LOS)	☐ **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 ☐ **Do not include** any LOS analysis in the City's TIA Guidelines	

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

FAQ | Evaluating Transportation Impacts in CEQA

Based on New Guidelines as Directed by SB 743

   b Total VMT or partial VMT associated with select vehicle types, land uses, and/or trip purposes/tours
   c Project generated VMT versus project effect on VMT
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 routes 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?

PROS

1. Aligns with state goals for GHG reduction, infill development, transit, active transportation, and public health.
2. Requires limited effort to implement.
3. Creates VMT impact screening opportunities for housing, employment, transit, bicycle, pedestrian, and minor roadway projects.
4. Includes specific thresholds.

CONS

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.
2. Includes evidence that a 15 percent reduction from baseline may not be sufficient to achieve statewide goals for GHG reduction.
3. Does not consider local general plan role in setting threshold expectations.
4. Includes inconsistent threshold expectations based on the same land use and transportation context.

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.

Navigating Projects Through SB 743

FEHR & PEERS

OPR Steps	Project Questions	Procedural Flowchart
Step 1 Screening	Is the project type: Transit Active transportation One of the road project types on pages 20 and 21 of the OPR Technical Advisory*? (See Page 2 for complete list)	
	Does substantial evidence exist to support a finding that the project will not generate new VMT? (Refer to the SBCTA web tool)	Process complete
Step 2 Establishing Baseline VMT Levels	What are the baseline VMT levels? (Refer to the SBCTA web tool)	Calculate baseline VMT (see notes)
Step 3 Establishing VMT	What are the baseline and future estimates for project-generated VMT? What is the future estimate for project effect on VMT?	Calculate project VMT (see notes) Calculate cumulative VMT (see notes)
Step 4 Identifying Significant Impacts	Do the VMT forecasts from Step 3 exceed the VMT thresholds from Step 3 or is the project inconsistent with the RTP or RTP/SCS?	Potential significant project-generated and/or project effect impact. Develop mitigation measures Process complete
Step 5 Developing Mitigation Measures	What is the surrounding land use context?	Develop mitigation measures for urban context (see notes) Develop mitigation measures for suburban context (see notes) Develop mitigation measures for rural context (see notes)
Step 6 Identifying Impacts of Mitigation	Do the mitigations require new or expanded facilities/ services that may have environmental impacts that require evaluation under CEQA?	Additional analysis Process complete

Decision

Analytical process or procedural outcome

SB743 Procedural Notes (1/2)

FEHR & PEERS

OPR Steps	Analysis Procedures	Technical Notes
Step 1 Screening	Per 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, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets and that do not add additional motor vehicle capacity • Roadside safety devices or hardware installation such as median barriers and guardrails Roadway shoulder enhancements to provide "breakdown space" dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes • Addition of an auxiliary lane 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 U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not utilized as through lanes • Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit • Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel • Addition of a new lane that is permanently restricted to use only by transit vehicles • Reduction in number of through lanes • Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles • Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features • Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow • Timing of signals to optimize vehicle, bicycle, or pedestrian flow • Installation of roundabouts or traffic circles • Installation or reconfiguration of traffic calming devices • Adoption of or increase in tolls • Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase • Initiation of new transit service • Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes • Removal or relocation of off-street or on-street parking spaces • Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs) • Addition of traffic wayfinding signage • Rehabilitation and maintenance projects that do not add motor vehicle capacity • Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way • Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve nonmotorized travel • Installation of publicly available alternative fuel/charging infrastructure • Addition of passing lanes, truck climbing lanes, or truck brake check lanes in rural areas that do not increase overall vehicle capacity along the corridor	
Step 2 Establishing Baseline VMT Levels		Baseline should be tied to the date of the NOP release. Hence, baseline VMT calculations may require obtaining current year data or interpolating between base year and future year model estimates.
Step 3 Establishing VMT Threshold	**Project-Generated VMT** Use the same year as baseline VMT to determine the base year. Future year should be set at the latest RTP horizon year. VMT should be calculated using the latest version of SBTAM using the PA or OD method. **Project Effect on VMT** Use the RTP horizon year. VMT should be calculated using the latest version of SBTAM and the boundary method.	Lead agencies have the option to select a threshold. As part of the SBCTA SB 743 Implementation Study, local jurisdictions reviewed threshold and methodology options. Refer to the latest guidelines where the project is located to determine which threshold and methodology apply.

SB743 Procedural Notes (2/2)

FEHR & PEERS

OPR Steps	Analysis Procedures	Technical Notes
Step 4 Identifying Significant Impacts	Identify significant impacts for all impact scenarios. Significant impact may occur if project's Step 3 VMT exceeds Step 3 threshold or the project is found inconsistent with the RTP or RTP/SCS (i.e., the project generates more VMT than the adopted RTP or RTP/SCS)	
Step 5 Developing Mitigation Measures	As part of the SBCTA SB 743 Implementation Study, mitigation measures considered most appropriate for San Bernardino County were identified. Refer to this list. Note that different mitigation strategies will be applicable for different contexts and land use types	Refer to latest CAPCOA and CARB research when quantifying mitigation potential. Substantial evidence is required for all potential mitigation measures
Step 6 Identifying Impacts of Mitigation	Mitigation actions can create 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 15126.4(a)(1)(D)	

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 OC18-0585

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.

Technical Advisory on Evaluating Transportation Impacts in CEQA (page 10)
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****.*

Technical Advisory on Evaluating Transportation Impacts in CEQA (page 18)
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.

Technical Advisory on Evaluating Transportation Impacts in CEQA – Rural Projects Outside of MPOs (page 19)
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.

- Assembly Bill 32 (2006) requires statewide greenhouse gas reductions to 1990 levels by 2020 and continued reductions beyond 2020.
- 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 B-30-15 (2015) sets a GHG emissions reduction target of 40 percent below 1990 levels by 2030.
- 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.
- The Caltrans Strategic Management Plan (2015) calls for a 15 percent reduction in VMT per resident compared to 2010 levels, by 2020.
- 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.

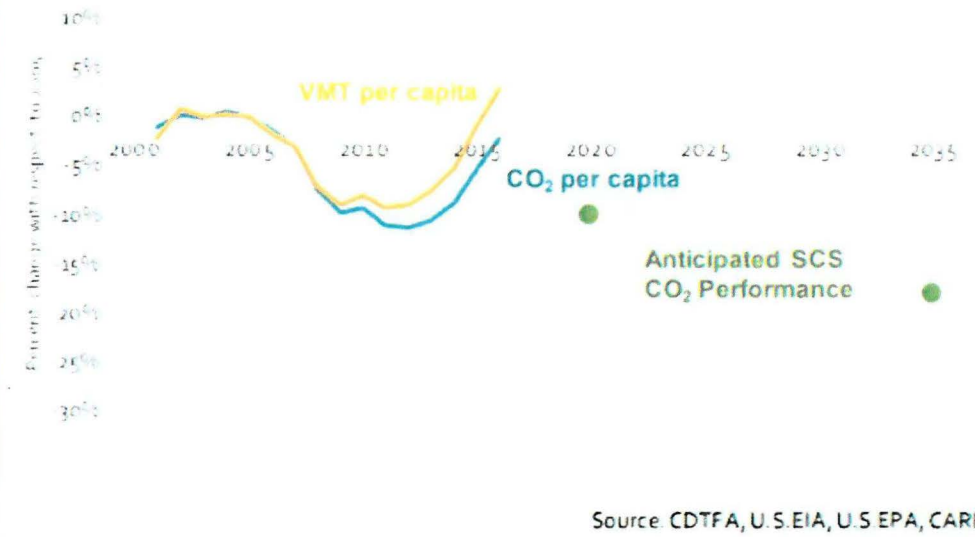
Lead agencies should note that the OPR recommended VMT thresholds are almost exclusively based on GHG and air pollution reduction goals. While this is one of the SB 743 legislative intent objectives, a less clear connection is made to the other legislative intent objectives to encourage infill development 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 CO_2 and Vehicle Miles Traveled (VMT) Per Capita Trend with Respect to Anticipated Performance of Current SB 375 SCSs[2]



Source: CDTFA, U.S.EIA, U.S EPA, CARB

[2] CO_2 and VMT calculated based on California Department of Tax and Fee Administration (CDTFA) gasoline fuel sales data

California VMT Trends

Source: *2018 Progress Repot 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 the baseline (i.e., existing condition) VMT, VMT per resident, VMT per employee, or VMT per service population[3]. 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 conditions[4] 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

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[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.

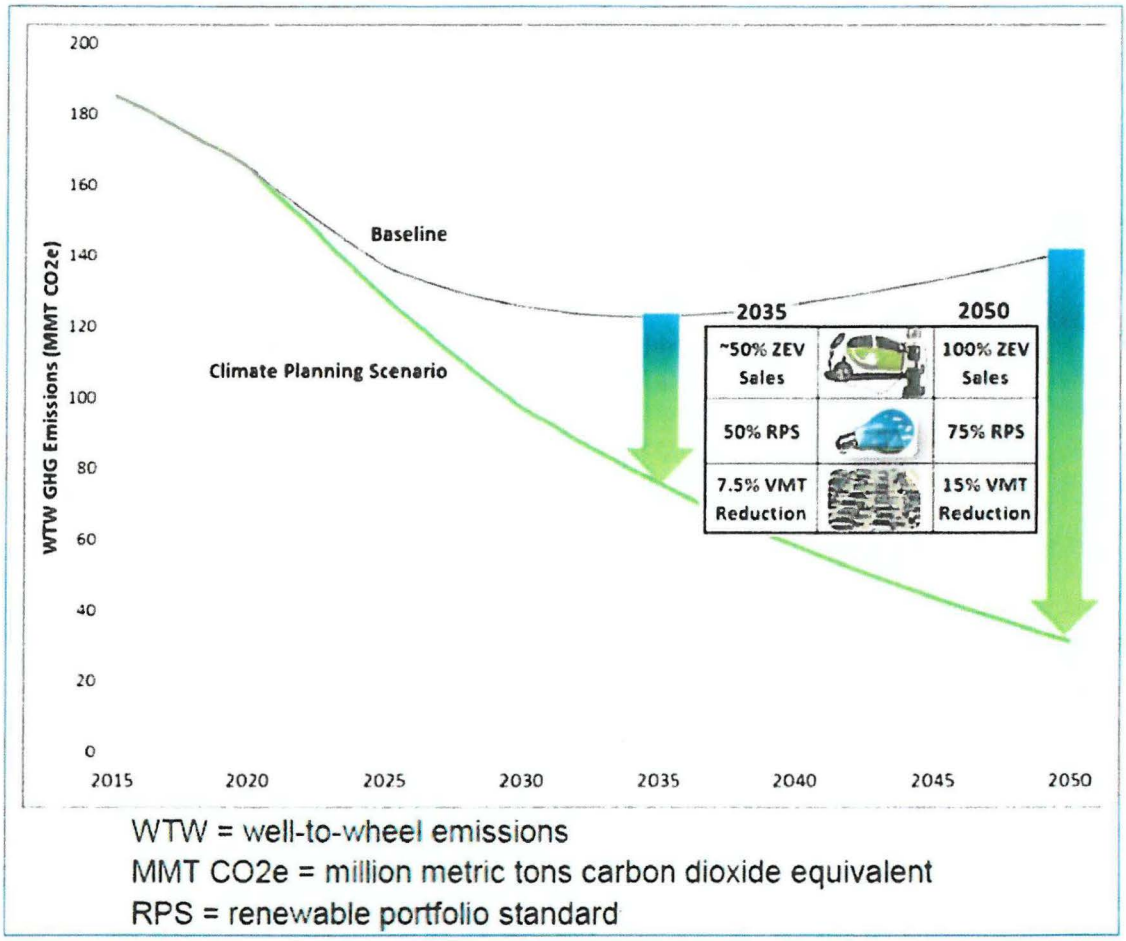
- State expectations for air quality and GHG may not align with local/lead agency expectations. Using state expectations for a local lead agency threshold may create inconsistencies with local city or county general plans.
- Each agency relying upon OPR's recommended threshold should still develop and 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 (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.

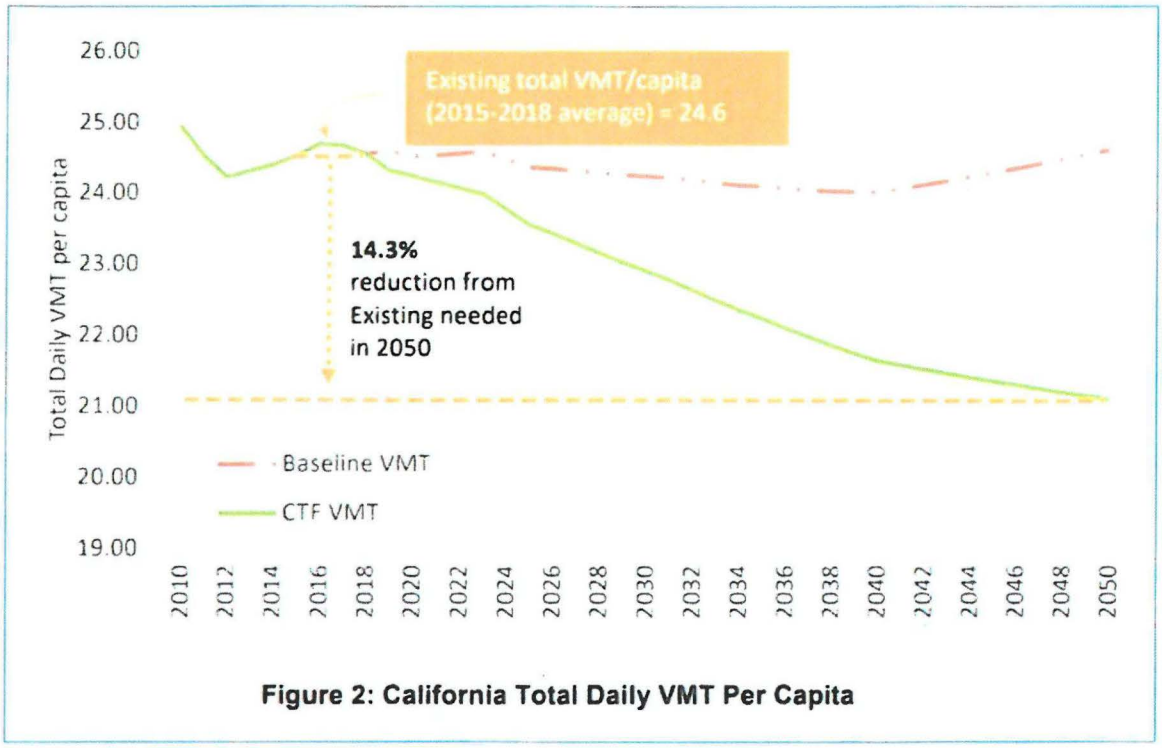


Figure 2: California Total Daily VMT Per Capita

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.

- *Local Development – Intergovernmental Review Program Interim Guidance*, Caltrans, November 9, 2016 (http://www.dot.ca.gov/hq/tpp/documents/RevisedInterimGuidance11092016.pdf)

An important part of the Caltrans guidance are the following expectations for thresholds and impact findings related to VMT.

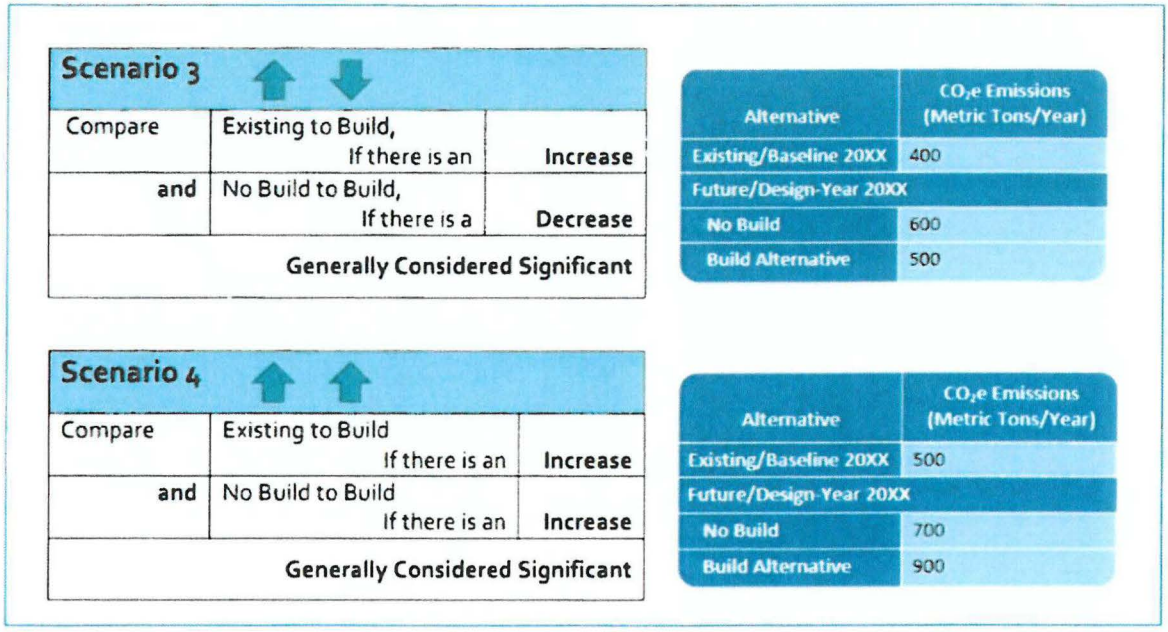
A. Comment on Vehicle Miles Traveled associated with the project.

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~~ in 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.[1] Methods for assessing VMT should be compared 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.

Source: http://www.dot.ca.gov/hq/tpp/documents/RevisedInterimGuidance11092016.pdf

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%.

FEHR PEERS

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 Mitigation and TDM Strategy Assessment OC18-0585

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.

- http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf
- https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf
- https://trrjournalonline.trb.org/doi/abs/10.3141/2653-02

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/ctcspwla-timp-final-eir/

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

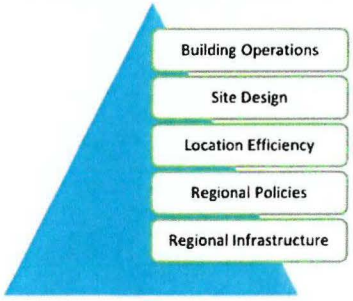
jurisdictional boundaries. A key part of 'operations' is that the entity will need the capability to provide verification of the VMT reduction performance and to adjust the program projects over time. Whether the entity is regional or sub-regional is another important consideration. A sub-regional entity 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



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

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

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 CACPOA 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

Mitigation Option	Description	Benefits	Challenges
No feasible action	This option recognizes that feasible mitigation is not available due to the land use or transportation context.	- Recognizes the limitations of VMT impact mitigation when alternatives to driving are not reasonably available.	Could result in more significant and unavoidable (SAU) impacts that require an EIR instead of a negative declaration.
Change project	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.	- 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.	Project applicants may resist land use or other built environment changes due to financial concerns and market feasibility.
TDM	This option relies on strategies to reduce vehicle travel through incentives and disincentives often tied to the cost and convenience of vehicle travel.	- 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.	- 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
Impact fee program	This option requires developing a new impact fee program with a nexus	- Provides clear expectations for	- Requires lead agency to develop stakeholder support and funding to

Table 2 – Summary of VMT Impact Mitigation Options

Mitigation Option	Description	Benefits	Challenges
	based on VMT reduction. This type of nexus would allow the fee program capital improvement program (CIP) to include transit, bicycle, pedestrian and other types of projects that can demonstrate VMT reduction effectiveness.	developers about the VMT mitigation costs. - Increases funding for VMT reduction projects such that larger and more effective projects may be implemented. - May result in greater levels of VMT reduction compared to project-by-project mitigation.	create and maintain the fee program. - 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.
Mitigation bank/exchange	This option matches VMT generators with VMT reducers within or beyond jurisdictional boundaries through a third party.	- Could create mitigation options that may not otherwise be available or feasible. - Not limited to jurisdictional boundaries. - Could create incentive for new innovative mitigation ideas.	- Requires an entity capable of operating and maintaining the program with the ability to verify VMT reductions. - Mitigation may not occur in immediate vicinity of the project site where impacts of vehicle travel will be most directly felt by neighbors.
General plan coverage	This option would address VMT impacts through a general plan update or amendment EIR and rely on CEQA Guidelines Section 15183 for subsequent project streamlining (as summarized in the *SB 743 Implementation Thresholds Assessment Technical Memorandum dated 10.31.18*).	- Addresses VMT reduction expectations in consideration of other jurisdictional objectives. - Offers a wider range of mitigation options than at the project-scale. - For subsequent projects consistent with the general plan, additional VMT impact analysis would not be required.	- General plan updates or amendments require substantial time and funding commitments.

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ATTACHMENT A

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Comparison of CAPCOA Strategies Versus New Research Since 2010

					New Information Since CAPCOA Was Published in 2010		
CAPCOA Category	**CAPCOA #**	**CAPCOA Strategy**	**CAPCOA Reduction**	**Strength of Substantial Evidence for CEQA Impact Analysis?**	**New information**	**Change in VMT reduction compared to CAPCOA**	**Literature or Evidence Cited**
Land Use/Location	3.1.1	LUT-1 Increase Density	0.8% - 30% VMT reduction due to increase in density	Adequate	Increasing residential density is associated with lower VMT per capita. Increased residential density in areas with high jobs access may have a greater VMT change than increases in regions with lower jobs access The range of reductions is based on a range of elasticities from -0.04 to -0.22. The low end of the reductions represents a -0.04 elasticity of demand in response to a 10% increase in residential units or employment density and a -0.22 elasticity in response to 50% increase to residential/employment density.	0.4% -10.75%	Primary sources: Boarnet, M. and Handy, S. (2014). Impacts of Residential Density on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm Secondary source: Stevens, M. (2017). Does Compact Development Make People Drive Less? Journal of the American Planning Association, 83(1), 7-18.
Land Use/Location	3.1.9	LUT-9 Improve Design of Development	3.0% - 21.3% reduction in VMT due to increasing intersection density vs. typical ITE suburban development	Adequate	No update to CAPCOA literature; advise applying CAPCOA measure only to large developments with significant internal street structure	Same	N/A
Land Use/Location	3.1.4	LUT-4 Increase Destination Accessibility	6.7% -20% VMT reduction due to decrease in distance to major job center or downtown	Adequate	Reduction in VMT due to increased regional accessibility (jobs gravity). Locating new development in areas with good access to destinations reduces VMT by reducing trip lengths and making walking, biking, and transit trips more feasible. Destination accessibility is measured in terms of the number of jobs (or other attractions) reachable within a given travel time, which tends to be highest at central locations and lowest at peripheral ones	0.5% -12%	Primary sources: Handy, S. et al. (2014). Impacts of Network Connectivity on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm Handy, S. et al. (2013). Impacts of Regional Accessibility on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm Secondary source: Holtzclaw, et al. (2002.) Location Efficiency: Neighborhood and Socioeconomic Characteristics Determine Auto Ownership and Use – Studies in Chicago, Los Angeles, and Chicago. Transportation Planning and Technology, Vol. 25, pp. 1–27.

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					New Information Since CAPCOA Was Published in 2010		
CAPCOA Category	CAPCOA #	CAPCOA Strategy	CAPCOA Reduction	Strength of Substantial Evidence for CEQA Impact Analysis?	New information	Change in VMT reduction compared to CAPCOA	Literature or Evidence Cited
Land Use/ Location	3.1.3	LUT-3 Increase Diversity of Urban and Suburban Developments	9%-30% VMT reduction due to mixing land uses within a single development	Adequate	1) VMT reduction due to mix of land uses within a single development. Mixing land uses within a single development can decrease VMT (and resulting GHG emissions), since building users do not need to drive to meet all of their needs. 2) Reduction in VMT due to regional change in entropy index of diversity. Providing a mix of land uses within a single neighborhood can decrease VMT (and resulting GHG emissions), since trips between land use types are shorter and may be accommodated by non-auto modes of transport. For example when residential areas are in the same neighborhood as retail and office buildings, a resident does not need to travel outside of the neighborhood to meet his/her trip needs. At the regional level, reductions in VMT are measured in response to changes in the entropy index of land use diversity.	1) 0%-12% 2) 0.3%-4%	1) Ewing, R. and Cervero, R. (2010). Travel and the Built Environment - A Meta-Analysis. Journal of the American Planning Association,76(3),265-294. Cited in California Air Pollution Control Officers Association. (2010) Quantifying Greenhouse Gas Mitigation Measures. Retrieved from: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf Frank, L., Greenwald, M., Kavage, S. and Devlin, A. (2011). An Assessment of Urban Form and Pedestrian and Transit Improvements as an Integrated GHG Reduction Strategy. WSDOT Research Report WA-RD 765.1. Washington State Department of Transportation. Retrieved from: http://www.wsdot.wa.gov/research/reports/fullreports/765.1.pdf Nasri, A. and Zhang, L. (2012). Impact of Metropolitan-Level Built Environment on Travel Behavior. Transportation Research Record: Journal of the Transportation Research Board, 2323(1), 71-79. Sadek, A. et al. (2011). Reducing VMT through Smart Land-Use Design. New York State Energy Research and Development Authority. Retrieved from: https://www.dot.ny.gov/divisions/engineering/technical-services/trans-r-and-d-repository/C-08-29%20Final%20Report_December%202011%20%282%29.pdf Speers, S. et al. (2014). Impacts of Land-Use Mix on Passenger Vehicle Use and Greenhouse Gas Emissions: Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm 2) Zhang, Wengia et al. "Short- and Long-Term Effects of Land Use on Reducing Personal Vehicle Miles of Travel."
Land Use/ Location	3.1.5	LUT-5 Increase Transit Accessibility	0.5%-24.6% reduce in VMT due to locating a project near high-quality transit	Adequate	1) VMT reduction when transit station is provided within 1/2 mile of development (compared to VMT for sites located outside 1/2 mile radius of transit). Locating high density development within 1/2 mile of transit will facilitate the use of transit by people traveling to or from the Project site. The use of transit results in a mode shift and therefore reduced VMT. 2) Reduction in vehicle trips due to implementing TOD. A project with a residential/commercial center designed around a rail or bus station, is called a transit-oriented development (TOD). The project description should include, at a minimum, the following design features: - A transit station/stop with high-quality, high-frequency bus service located within a 5-10 minute walk (or roughly ¼ mile from stop to edge of development), and/or - A rail station located within a 20 minute walk (or roughly ½ mile from station to edge of development) - Fast, frequent, and reliable transit service connecting to a high percentage of regional destinations - Neighborhood designed for walking and cycling	1) 0%-5.8% 2) 0%-7.3%	1) Lund, H. et al. (2004). Travel Characteristics of Transit-Oriented Development in California. Oakland, CA: Bay Area Rapid Transit District, Metropolitan Transportation Commission, and Caltrans. Tal, G. et al. (2013). Policy Brief on the Impacts of Transit Access (Distance to Transit) Based on a Review of the Empirical Literature. California Air Resources Board. Retrieved from: https://www.arb.ca.gov/cc/sb375/policies/transitaccess/transit_access_brief120313.pdf 2) Zarnir, K. R. et al. (2014). Effects of Transit-Oriented Development on Trip Generation, Distribution, and Mode Share in Washington, D.C., and Baltimore, Maryland. Transportation Research Record: Journal of the Transportation Research Board: 2413, 45-53. DOI: 10.3141/2413-05

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Land Use/ Location	3 1 6	LUT-6 Integrate Affordable and Below Market Rate Housing	0 04%-1 20% reduction in VMT for making up to 30% of housing units BMR	Weak - Should only be used where supported by local data on affordable housing trip generation	Observed trip generation indicates substantial local and regional variation in trip making behavior at affordable housing sites. Recommend use of ITE rates or local data for senior housing	N/A	"Draft Memorandum: Infill and Complete Streets Study, Task 2 1: Local Trip Generation Study." *Measuring the Miles: Developing new metrics for vehicle travel in LA*. City of Los Angeles, April 19, 2017.
Neighborhood Site Enhancements	3 2 1	SDT 1 Provide Pedestrian Network Improvements	0%-2% reduction in VMT for creating a connected pedestrian network within the development and connecting to nearby destinations	Adequate	VMT reduction due to provision of complete pedestrian networks. Only applies if located in an area that may be prone to having a less robust sidewalk network	0 5% -5 7%	Handy, S. et al. (2014). Impacts of Pedestrian Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions. Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm
Neighborhood Site Enhancements	3 7 2	SDT 2 Provide Traffic Calming Measures	0 25%-1% VMT reduction due to traffic calming on street, within and around the development	Adequate	Reduction in VMT due to expansion of bike networks in urban areas. Strategy only applies to bicycle facilities that provide a dedicated lane for bicyclists or a completely separated right-of-way for bicycles and pedestrians Project level definition: Enhance bicycle network citywide (or at similar scale) such that a building entrance or bicycle parking is within 200 yards walking or bicycling distance from a bicycle network that connects to at least one of the following: at least 10 diverse uses; a school or employment center. If the project total floor area is 50% or more residential, or a bus rapid transit stop, light or heavy rail station, commuter rail station, or ferry terminal. All destinations must be 3 mile bicycling distance from project site. Include educational campaigns to encourage bicycling	0% 1 7%	Zahabi, S. et al. (2016). Exploring the link between the neighborhood typologies, bicycle infrastructure and commuting cycling over time and the potential impact on commuter GHG emissions. Transportation Research Part D: Transport and Environment. 47: 89-103.
Neighborhood Site Enhancements	3 7 3	SDT 3 Implement an NEV Network	0 5% 12 7% VMT reduction for GHG emitting vehicles, depending on level of local NEV penetration	Weak - not recommended without supplemental data	Limited evidence and highly limited applicability. Use with supplemental data only	N/A	City of Lincoln, MHM Engineers & Surveyors. Neighborhood Electric Vehicle Transportation Program Final Report, Issued 04/05/05, and City of Lincoln, A Report to the California Legislature as required by Assembly Bill 2353, Neighborhood Electric Vehicle Transportation Plan Evaluation, January 1, 2008. Cited in: California Air Pollution Control Officers Association. (2010). Quantifying Greenhouse Gas Mitigation Measures. Retrieved from: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

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Neighborhood Site Enhancements	3.4.9	TRT-9 Implement Car-Sharing Program	0.4% - 0.7% VMT reduction due to lower vehicle ownership rates and general shift to non-driving modes	Adequate	Vehicle trip reduction due to car sharing programs; reduction assumes 1%-5% penetration rate. Implementing car sharing programs allows people to have on-demand access to a shared fleet of vehicles on an as-needed basis, as a supplement to trips made by non-SOV modes. Transit station-based programs focus on providing the "last-mile" solution and link transit with commuters final destinations. Residential-based programs work to substitute entire household based trips. Employer-based programs provide a means for business/day trips for alternative mode commuters and provide a guaranteed ride home option. The reduction shown here assumes a 1%-5% penetration rate	0.3%-1.6%	Lovejoy, K. et al (2013). Impacts of Carsharing on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm *Need to verify with more recent UCD research*
Parking Pricing	3.3.1	PDT-1 Limit Parking Supply	5%-17.5% VMT reduction in response to reduced parking supply vs. ITE parking generation rate	Weak - not recommended. Fehr & Peers has developed new estimates for residential land use only that may be used	CAPCOA reduction range derived from estimate of reduced vehicle ownership not supported by observed trip or VMT reductions. Evidence is available for mode shift due to presence/absence of parking in high-transit urban areas, additional investigation ongoing	Higher	Fehr & Peers estimated a linear regression formula based on observed data from multiple locations. Resulting equation produces maximum VMT reductions for residential land use only of 30% in suburban locations and 50% in urban locations based on parking supply percentage reductions.
Parking Pricing	3.3.2	PDT-2 Unbundle Parking Costs from Property Cost	2.6% - 13% VMT reduction due to decreased vehicle ownership rates	Adequate - conditional on the agency not requiring parking minimums and pricing/managing on-street parking (i.e., residential parking permit districts, etc.)	Reduction in VMT, primarily for residential uses, based on range of elasticities for vehicle ownership in response to increased residential parking fees. Does not account for self-selection. Only applies if the city does not require parking minimums and if on-street parking is priced and managed (i.e., residential parking permit districts)	2%-12%	Victoria Transport Policy Institute (2009). Parking Requirement Impacts on Housing Affordability. Retrieved March 2010 from: http://www.vtpi.org/park-hou.pdf

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Parking Pricing	3 5 3	PDT-3 Implement Market Price Public Parking	2 8% 5 5% VMT reduction due to "park once" behavior and disincentive to driving	Adequate	Implement a pricing strategy for parking by pricing all central business districts/employment center/retail center on street parking. It will be priced to encourage park once" behavior. The benefit of this measure above that of paid parking at the project only is that it deters parking spillover from project supplied parking to other public parking nearby, which undermine the vehicle miles traveled (VMT) benefits of project pricing. It may also generate sufficient area-wide mode shifts to justify increased transit service to the area VMT reductions applies to VMT from visitor/customer trips only. Reductions higher than top end of range from CAPCOA report apply only in conditions with highly constrained on-street parking supply and lack of comparably priced off-street parking	2 8% 14 5%	Clinch, J P and Kelly, J A. (2003) Temporal Variance Of Revealed Preference On-Street Parking Price Elasticity. Dublin: Department of Environmental Studies, University College Dublin. Retrieved from http://www.ucd.ie/gpep/research/workingpapers/2004/04-03.pdf. Cited in Victoria Transport Policy Institute (2017). Transportation Elasticities. How Prices and Other Factors Affect Travel Behavior. Retrieved from: http://www.vtpi.org/tdm/tdm11.htm Hensher, D. and King, J. (2001) Parking Demand and Responsiveness to Supply, Price and Location in Sydney Central Business District. Transportation Research A. 35(3), 177-196. Millard-Ball, A. et al. (2013) Is the curb 80% full or 20% empty? Assessing the impacts of San Francisco's parking pricing experiment. Transportation Research Part A. 63(2014): 76-92. Shoup, D. (2011) The High Cost of Free Parking. APA Planners Press. p. 290. Cited in Pierce, G. and Shoup, D. (2013). Getting the Prices Right. Journal of the American Planning Association. 79(1), 67-81.
Transit System	3 5 3	TST-3 Expand Transit Network	0 1-8 2% VMT reduction in response to increase in transit network coverage	Adequate	Reduction in vehicle trips due to increased transit service hours or coverage. Low end of reductions is typical of project-level implementation (payment of impact fees and/or localized improvements).	0 1% 10 5%	Handy, S. et al. (2013). Impacts of Transit Service Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm
Transit System	3 5 4	TST-4 Increase Transit Service Frequency/Speed	0 02%-2 5% VMT reduction due to reduced headways and increased speed and reliability	Adequate	Reduction in vehicle trips due to increased transit frequency/decreased headway. Low end of reduction is typical of project-level implementation (payment of impact fees and/or localized improvements).	0 3%-6 3%	Handy, S. et al. (2013). Impacts of Transit Service Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm
Transit System	3 5 1	TST-1 Provide a Bus Rapid Transit System	0 02%-3 2% VMT reduction by converting standard bus system to BRT system	Adequate	No new information identified	Same	N/A
Commute Trip Reduction	3 4 1	TRT-1 Implement CTR Program- Voluntary	1 0%-6 2% commute VMT reduction due to employer-based mode shift program	Adequate. Effectiveness is building/tenant specific. Do not use with "TRT-2 Implement CTR Program - Required Implementation/Monitoring" or with CAPCOA strategies TRT-3 4 2 through TRT-3 4 9	Reduction in vehicle trips in response to employer-led TDM programs. The CTR program should include all of the following to apply the effectiveness reported by the literature: - Carpooling encouragement - Ride-matching assistance - Preferential carpool parking - Flexible work schedules for carpools - Half time transportation coordinator - Vanpool assistance - Bicycle end-trip facilities (parking, showers, and lockers)	1 0%-6 0%	Boarnet, M. et al. (2014). Impacts of Employer-Based Trip Reduction Programs and Vanpools on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm
Commute Trip Reduction	3 4 2	TRT-2 Implement CTR Program- Required Implementation/Monitoring	4 2% 21 0% commute VMT reduction due to employer-based mode shift program with required monitoring and reporting	Adequate. Effectiveness is building/tenant specific. Do not use with "TRT-1 Implement CTR Program - Voluntary" or with CAPCOA strategies TRT-3 4 2 through TRT-3 4 9	Limited evidence available. Anecdotal evidence shows high investment produces high VMT/vehicle trip reductions at employment sites with monitoring requirements and specific targets	Same	Nelson/Nygaard (2008). South San Francisco Mode Share and Parking Report for Genentech Inc. (p. 8). Cited in: California Air Pollution Control Officers Association. (2010). Quantifying Greenhouse Gas Mitigation Measures. Retrieved from: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

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CAPCOA Category	CAPCOA #	CAPCOA Strategy	CAPCOA Reduction	Strength of Substantial Evidence for CEQA Impact Analysis?	New Information	Change in VMT reduction compared to CAPCOA	Literature or Evidence Cited
Commute Trip Reduction	T-4-4	TRT-4 Implement Subsidized or Discounted Transit Program	0.8%-70% commute VMT reduction due to transit subsidy of up to $6/day	Adequate - Effectiveness is building/tenant specific. Do not use with "TRT-1 Implement CTR Program - Voluntary" or "TRT-2 Implement CTR Program - Required Implementation/Monitoring."	1) Reduction in vehicle trips in response to reduced cost of transit use, assuming that 10-50% of new bus trips replace vehicle trips. 2) Reduction in commute trip VMT due to employee benefits that include transit. 3) Reduction in all vehicle trips due to reduced transit fares system-wide, assuming 25% of new transit trips would have been vehicle trips.	1) 0.3%-34%. 2) 0.16%. 3) 0.1% to 6.9%.	1) Victoria Transport Policy Institute. (2017). Understanding Transport Demands and Elasticities. Online TDM Encyclopedia. Retrieved from: http://www.vtpi.org/tdm/tdm11.htm. 2) Carolina, P. et al. (2016). Do Employee Commuter Benefits Increase Transit Ridership? Evidence from the NY-NJ Region. Washington, DC: Transportation Research Board. 96th Annual Meeting. 3) Handy, S. et al. (2012). Impacts of Transit Service Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm.
Commute Trip Reduction	T-4-15	TRT-15 Employee Parking Cash-Out	0.6%-7.7% commute VMT reduction due to implementing employee parking cash-out	Weak - Effectiveness is building/tenant specific. Research data is over 10 years old (1997).	Shoup case studies indicate a reduction in commute vehicle trips due to implementing cash-out without implementing other trip reduction strategies.	3%-7.7%	Shoup, D. (1997). Evaluating the Effects of Cashing Out Employer-Paid Parking: Eight Case Studies. Transport Policy. California Air Resources Board. Retrieved from: https://www.arb.ca.gov/research/apr/past/93-308a.pdf. This citation was listed as an alternative literature in CAPCOA.
Commute Trip Reduction	T-4-14	TRT-14 Price Workplace Parking	0.1%-19.7% commute VMT reduction due to mode shift	Adequate - Effectiveness is building/tenant specific.	Reduction in commute vehicle trips due to priced workplace parking. effectiveness depends on availability of alternative modes. Workplace parking pricing may include explicitly charging for parking, implementing above-market rate pricing, validating parking only for invited guests, not providing employee parking and transportation allowances, and educating employees about available alternatives.	0.5%-14%	Primary sources Concas, S. and Nayak, N. (2012). A Meta-Analysis of Parking Price Elasticity. Washington, DC: Transportation Research Board. 2012 Annual Meeting. Dale, S. et al. (2016). Evaluating the Impact of a Workplace Parking Levy on Local Traffic Congestion: The Case of Nottingham, UK. Washington, DC: Transportation Research Board. 96th Annual Meeting. Secondary sources Victoria Transport Policy Institute. (2017). Understanding Transport Demands and Elasticities. Online TDM Encyclopedia. Retrieved from: http://www.vtpi.org/tdm/tdm11.htm. Spears, S. et al. (2014). Impacts of Parking Pricing on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm.
Commute Trip Reduction	T-4-6	TRT-6 Encourage Telecommuting and Alternative Work Schedules	0.07%-5.5% commute VMT reduction due to reduced commute trips	Adequate - Effectiveness is building/tenant specific. Do not use with "TRT-1 Implement CTR Program - Voluntary" or "TRT-2 Implement CTR Program - Required Implementation/Monitoring."	VMT reduction due to adoption of telecommuting. Alternative work schedules could take the form of staggered starting times, flexible schedules, or compressed work weeks.	0.2%-4.5%	Handy, S. et al. (2011). Policy Brief on the Impacts of Telecommuting Based on a Review of the Empirical Literature. California Air Resources Board. Retrieved from: https://www.arb.ca.gov/cc/sb375/policies/telecommuting/telecommuting_brief120313.pdf.
Commute Trip Reduction	T-4-7	1) TRT-7 Implement CTR Marketing 2) Launch Targeted Behavioral Interventions	0.8%-4.0% commute VMT reduction due to employer marketing of alternatives	Adequate - Effectiveness is building/tenant specific. Do not use with "TRT-1 Implement CTR Program - Voluntary" or "TRT-2 Implement CTR Program - Required Implementation/Monitoring."	1) Vehicle trips reduction due to CTR marketing. 2) Reduction in VMT from institutional trips due to targeted behavioral intervention programs.	1) 0.9% to 26% 2) 1%-6%	1) Pratt, Dick. Personal communication regarding the Draft of TCRP 95 Traveler Response to Transportation System Changes - Chapter 19 Employer and Institutional TDM Strategies. Transit Cooperative Research Program. Cited in California Air Pollution Control Officers Association. (2010) Quantifying Greenhouse Gas Mitigation Measures. Retrieved from: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf. Dill, J. and Mohr, C. (2018). Long Term Evaluation of Individualized Marketing Programs for Travel Demand Management. Portland, OR: Transportation Research and Education Center (TREC). Retrieved from: http://pdxscholar.library.pdx.edu/trec_tsc. 2) Brown, A. and Ralph, K. (2017). "The Right Time and Place to Change Travel Behavior: An Experimental Study." Washington, DC: Transportation Research Board, 2017 Annual Meeting. Retrieved from: https://trid.trb.org/view.aspx?id=1437253.

TDM STRATEGY EVALUATION - DRAFT V 1.0

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Comparison of CAPCOA Strategies Versus New Research Since 2010

CAPCOA Category	CAPCOA #	CAPCOA Strategy	CAPCOA Reduction	Strength of Substantial Evidence for CEQA Impact Analysis?	New Information Since CAPCOA Was Published in 2010: New information	Change in VMT reduction compared to CAPCOA	Literature or Evidence Cited
Commute Trip Reduction	3.4.11	TRT 11 Provide Employer-Sponsored Vanpool/Shuttle	0.3%-13.4% commute VMT reduction due to employer-sponsored vanpool and/or shuttle service	Adequate - Effectiveness is building/tenant specific	1] Reduction in commute vehicle trips due to implementing employer sponsored vanpool and shuttle programs. 2] Reduction in commute vehicle trips due to vanpool incentive programs. 3] Reduction in commute vehicle trips due to employer shuttle programs	1] 0.5%-5.0% 2] 0.3%-7.4% 3] 1.4%-6.8%	1] Concas, Sisinnio; Winters, Philip; Wambalaba, Francis. (2005). Fare Pricing Elasticity, Subsidies, and Demand for Vanpool Services. Transportation Research Record: Journal of the Transportation Research Board, 1924. pp 215-223 2] Victoria Transport Policy Institute. (2015). Ridesharing: Carpooling and Vanpooling. Online TDM Encyclopedia. Retrieved from: http://vtpi.org/tdm/tdm34.htm 3] ICF. (2014). GHG Impacts for Commuter Shuttles Pilot Program
Commute Trip Reduction	3.4.3	TRT 3 Provide Ride-Sharing Programs	1%-15% commute VMT reduction due to employer ride share coordination and facilities	Adequate - Effectiveness is building/tenant specific. Do not use with "TRT 1 Implement CTR Program - Voluntary" or "TRT-2 Implement CTR Program - Required Implementation/Monitoring"	Commute vehicle trips reduction due to employer ride-sharing programs. Promote ride-sharing programs through a multi-faceted approach such as: - Designating a certain percentage of parking spaces for ride sharing vehicles - Designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles - Providing an app or website for coordinating rides	2.5%-8.3%	Victoria Transport Policy Institute. (2015). Ridesharing: Carpooling and Vanpooling. Online TDM Encyclopedia. Retrieved from: http://vtpi.org/tdm/tdm34.htm
Commute Trip Reduction	3.4.10	TRT 10 Implement a School Pool Program	7.2%-15.8% reduction in school VMT due to school pool implementation	Adequate - School VMT only	Limited new evidence available, not conclusive	Same	Transportation Demand Management Institute of the Association for Commuter Transportation. TDM Case Studies and Commuter Testimonials. Prepared for the US EPA. 1997. (p. 10, 36-38) WayToGo 2015 Annual Report. Accessed on March 12, 2017 from: http://www.waytogo.org/sites/default/files/attachments/waytogo annual report 2015.pdf
Commute Trip Reduction	3.4.13	TRT 13 Implement School Bus Program	38%-63% reduction in school VMT due to school bus service implementation	Adequate - School VMT only	VMT reduction for school trips based on data beyond a single school district School district boundaries are also a factor to consider. VMT reduction does not appear to be a factor that was considered in a select review of CA boundaries VMT reductions apply to school trip VMT only	5%-30%	Wilson, E., et al. (2007). The implications of school choice on travel behavior and environmental emissions. Transportation Research Part D: Transport and Environment 12(2007), 506-518
Not Applicable - not a CAPCOA strategy	Not Applicable - not a CAPCOA strategy	Not Applicable - not a CAPCOA strategy	Not Applicable - not a CAPCOA strategy	Not Applicable - not a CAPCOA strategy	Bikeshare car trip substitution rate of 7-19%, based on data from Washington DC and Minneapolis/St. Paul. Annual VMT reduction of 151,000 and 57,000, respectively. Includes VMT for rebalancing and maintenance. VMT reduction of 0.023 miles per day per bikeshare member estimated for Bay Area bikeshare, utilizing Minneapolis/St. Paul data from study above	57,000-151,000 annual VMT reduction, based on two large US cities VMT reduction of 0.023 miles per day per member, based on one large US city estimate	Fishman, E., Washington, S., & Haworth, N. (2014). Bike share's impact on car use: Evidence from the United States, Great Britain, and Australia. Transportation Research Part D: Transport and Environment, 31, 13-20 TDM Methodology: Impact of Carsharing Membership, Transit Passes, Bikesharing Membership, Unbundled Parking, and Parking Supply Reductions on Driving. Center for Neighborhood Technology. Peter Haas and Cindy Copp, with TransForm staff, May 5, 2016

FEHR PEERS

ATTACHMENT B

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

					New Information Since CAPCOA Was Published in 2010		
CAPCOA Category	CAPCOA #	CAPCOA Strategy	CAPCOA Reduction	Strength of Substantial Evidence for CEQA Impact Analysis?	New Information	Change in VMT reduction compared to CAPCOA(1)	Literature or Evidence Cited
Land Use/ Location	3 1 3	LUT-3 Increase Diversity of Urban and Suburban Developments	9%-30% VMT reduction due to mixing land uses within a single development	Adequate	1) VMT reduction due to mix of land uses within a single development; 2) Reduction in VMT due to regional change in entropy index of diversity	1) 0%-12% 2) 0.3%-4%	1) Ewing, R. and Cervero, R. (2010) Travel and the Built Environment - A Meta-Analysis. Journal of the American Planning Association,76(3),265-294. Cited in California Air Pollution Control Officers Association. (2010).Quantifying Greenhouse Gas Mitigation Measures. Retrieved from: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf Frank, L., Greenwald, M., Kavage, S. and Devlin, A. (2011). An Assessment of Urban Form and Pedestrian and Transit Improvements as an Integrated GHG Reduction Strategy. WSDOT Research Report WA-RD 765.1. Washington State Department of Transportation. Retrieved from: http://www.wsdot.wa.gov/research/reports/fullreports/765.1.pdf Nasri, A. and Zhang, L. (2012). Impact of Metropolitan-Level Built Environment on Travel Behavior. Transportation Research Record: Journal of the Transportation Research Board, 2323(1), 75-79. Sadek, A. et al. (2011). Reducing VMT through Smart Land Use Design. New York State Energy Research and Development Authority. Retrieved from: https://www.dot.ny.gov/divisions/engineering/technical-services/trans-r-and-d-repository/C-08-29%20Final%20Report_December%202011%20%282%29.pdf Spears, S.et al. (2014). Impacts of Land-Use Mix on Passenger Vehicle Use and Greenhouse Gas Emissions- Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm 2) Zhang, Wenjia et al. "Short- and Long-Term Effects of Land Use on Reducing Personal Vehicle Miles of Travel." Handy, S. et al. (2014). Impacts of Pedestrian Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm
Neighborhood Site Enhancements	3 2 1	SDT-1 Provide Pedestrian Network Improvements	0%-2% reduction in VMT for creating a connected pedestrian network within the development and connecting to nearby destinations	Adequate	VMT reduction due to provision of complete pedestrian network;	0.5%-5.7%	Handy, S. et al. (2014). Impacts of Pedestrian Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm
Neighborhood Site Enhancements	3 2 2	SDT-2 Provide Traffic Calming Measures	0.25%-1% VMT reduction due to traffic calming on streets within and around the development	Adequate	Reduction in VMT due to building out a low stress bike network, reduction in VMT due to expansion of bike networks in urban areas	0%-17%	1) California Air Resources Board. (2016). Greenhouse Gas Quantification Methodology for the California Transportation Commission Active Transportation Program Greenhouse Gas Reduction Fund Fiscal Year 2016-17. Retrieved from https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/ctc_atp_finalgm_fy16-17.pdf 2) Zahabi S. et al. (2016) Exploring the link between the neighborhood typologies, bicycle infrastructure and commuting cycling over time and the potential impact on commuter GHG emissions. Transportation Research Part D: Transport and Environment. 47, 89-103
Neighborhood Site Enhancements	3 4 9	TRT-9 Implement Car Sharing Program	0.4% - 0.7% VMT reduction due to lower vehicle ownership rates and general shift to non-driving modes	Adequate	Vehicle trip reduction due to car sharing programs, reduction assumes 1%-5% penetration rate Car sharing effect on VMT is still evolving due to TNC effects. UCD research showed less effect on car ownership due to car sharing participation and an uncertain effect on VMT	0.3%-1.6%	Lovejoy, K. et al. (2013). Impacts of Carsharing on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm Clewlow, Regina R. and Mishra, Gouri Shankar. (2017). Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States. UC Davis: Institute of Transportation Studies. Research Report - UCD-ITS-RR-17-07
Transit System	3 5 4	TST-4 Increase Transit Service Frequency/Speed	0.02%-2.5% VMT reduction due to reduced headways and increased speed and reliability	Adequate	Reduction in vehicle trips due to increased transit frequency/decreased headway	0.3%-6.3%	Handy, S. et al. (2013). Impacts of Transit Service Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm

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

					New Information Since CAPCOA Was Published in 2010		
CAPCOA Category	CAPCOA #	CAPCOA Strategy	CAPCOA Reduction	Strength of Substantial Evidence for CEQA Impact Analysis?	New information	Change in VMT reduction compared to CAPCOA(1)	Literature or Evidence Cited
Commute Trip Reduction	3 4 6	TRT-6 Encourage Telecommuting and Alternative Work Schedules	0.07%-5.5% commute VMT reduction due to reduced commute trips	Adequate - Effectiveness is building/tenant specific. Do not use with "TRT-1 Implement CTR Program - Voluntary" or "TRT-2 Implement CTR Program - Required Implementation/Monitoring."	VMT reduction due to adoption of telecommuting	0.2%-4.5%	Mandy, S. et al. (2011). Policy Brief on the Impacts of Telecommuting Based on a Review of the Empirical Literature. California Air Resources Board. Retrieved from https://www.arb.ca.gov/cc/sb375/policies/telecommuting/telecommuting_brief120313.pdf
Commute Trip Reduction	3 4 3	TRT-3 Provide Ride-Sharing Programs	1%-15% commute VMT reduction due to employer ride share coordination and facilities	Adequate - Effectiveness is building/tenant specific. Do not use with "TRT-1 Implement CTR Program - Voluntary" or "TRT-2 Implement CTR Program - Required Implementation/Monitoring."	Commute vehicle trips reduction due to employer ride sharing programs	2.5%-8.1%	Victoria Transport Policy Institute. (2015). Ridesharing, Carpooling and Vanpooling. Online TDM Encyclopedia. Retrieved from: http://vtpi.org/tdm/tdm34.htm

NOTES

(1) For specific VMT reduction ranges, refer to the cited literature.

ATTACHMENT 'D'

memorandum

DATE: May 21, 2020

TO: Brian Gengler, P.E., T.E., City Engineer

FROM: Sandipan Bhattacharjee, P.E., T.E., AICP, ENV-SP

SUBJECT: Screening Criteria for Vehicle Miles Traveled

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 impacts[1]. The SCAQMD in its *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*[2] 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.

[1] *MDAQMD California Environmental Quality Act (CEQA) And Federal Conformity Guidelines (http://www.mdaqmd.ca.gov/home/showdocument?id=538)*
[2] *http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2*

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 A – Greenhouse Gas and Trip Generation Thresholds

	Calculations Using 100 Units						Less Than Significant (3,000 MT of CO2e)	
Land Use	**#**	**Units**	**CO2e (MT)**	**Mobile CO2e**	**Weekday Trip Generation Rate**	**Weekday Trips**	Units	Trips
Single Family Residential	100	DU	2,204	1,551	9.44	944	136	1,285
Multi Family (Low Rise) Residential	100	DU	1,621	1,212	7.32	732	185	1,355
Office	100	TSF	1,321	828	9.74	974	227	2,212
Retail	100	TSF	2,463	1,902	37.75	3,775	122	4,598
Warehouse No Refrigeration, No Rail	100	TSF	362	105	1.74	174	829	1,442
Light Industrial	100	TSF	1,015	347	4.96	496	296	1,466

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.