

June 15, 2020

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VEHICLE MILES TRAVELED (VMT) PER CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) - UPDATE

INTRODUCTION/BACKGROUND

A significant change in the California Environmental Quality Act (CEQA) practice has been triggered by the implementation of Senate Bill (SB) 743, which removes the use of Level of Service (LOS) for determining transportation impacts in environmental review. Instead, CEQA Guidelines now specify that Vehicle Miles Traveled (VMT) is the appropriate metric to evaluate transportation impacts. To comply with these new rules, local jurisdictions will need to define practices for conducting VMT analysis in areas under their jurisdiction.

Under CEQA, lead agencies must determine whether a proposed project has the potential to cause significant environmental impacts including a project's impact on the transportation system. This determination must be based, to the extent possible, on factual data and scientific methods of analysis. Jurisdictions have typically used vehicle Level of Service (LOS) as the primary measure of a project's transportation impacts. The City developed and currently utilizes Traffic Operational Guidelines to determine how a project analyzes operational impacts.

On July 1, 2020, VMT will become CEQA's primary metric for determining a project's transportation impacts instead of LOS. In response, the City recently developed a Final Draft VMT Guidelines (See VMT web page link <https://srcity.org/VMT>) to implement SB 743 and comply with CEQA. While no longer a CEQA approved methodology, the City will continue to require projects to analyze traffic impacts

utilizing LOS through the Traffic Operational Guidelines to ensure that acceptable traffic operations are maintained. This additional evaluation is allowed under SB 743 as well as the OPR Guidelines.

According to the legislative intent contained in SB 743, these changes to current practice are intended to "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."

In December 2018, the California Governor's Office of Planning and Research (OPR) published the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (referred to herein as the OPR Technical Advisory), which provides guidelines on the implementation of SB 743. The OPR Technical Advisory's guidelines state that VMT must be the metric used to determine significant transportation impacts. This requirement will apply statewide effective July 1, 2020; lead agencies can opt in sooner at their own discretion.

ANALYSIS

IMPLEMENTING SB 743

There are several components of SB 743 implementation that the City will need to consider and address.

- Metrics – how VMT is presented
- Screening – which projects will require quantitative VMT analysis and which projects can be presumed not to cause a significant VMT impact
- Methods – what techniques will be used to calculate and forecast VMT
- Thresholds – what level of VMT is considered a significant environmental impact and

- Mitigation – how project sponsors can address a project’s significant VMT impacts.

In addition, there are three separate types of projects that are subject to CEQA review and for which VMT evaluation will be needed.

- Land Use Projects - development projects
- Land Use Plans – General Plan update and Specific Plans
- Transportation Projects – infrastructure changes, such as building roads, bicycle and pedestrian facilities and transit facilities.

PROJECT SCREENING

The City has established Screening Maps that identify areas in the City that are exempt from VMT analysis based on VMT information from the Sonoma County Transportation Authority (SCTA) Sonoma County Travel Model. (See VMT web page link <https://srcity.org/VMT>)

THRESHOLDS OF SIGNIFICANCE

The City will rely on VMT threshold recommendations contained in the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA*. OPR recommends that VMT thresholds for residential and employment-based land use projects be set at fifteen percent below the baseline VMT/capita or VMT/employee for Sonoma County. (See VMT web page link (<https://srcity.org/VMT>))

MITIGATION – VMT REDUCTION STRATEGIES

Projects should be designed to address VMT reduction strategies. This can be a combination of providing access to active transportation modes and transit stations as an example. The project must also comply with current Bicycle and Pedestrian Master Plan infrastructure improvements and may include removing gaps in bicycle and pedestrian networks or adding traffic calming. Additionally, it can include Transportation Demand Management (TDM) strategies, such as rideshare, car sharing, bike share, shuttle programs, education/training and transit fare subsidies and ECO passes.

PROCESS TO DATE

- 2015-Present Internal Collaboration with SCTA, Transportation and Public Works (TPW), Planning and Economic Development (PED), and City Attorney’s Office (CAO)
- 2019-Present TPW Developing Draft VMT Guidelines and Supporting Documents
- January 16, 2020 Bicycle and Pedestrian Advisory Board (BPAB) - Presentation
- January 29, 2020 Climate Action Subcommittee (CAS) - Presentation
- May 12, 2020 – VMT Training (PED, Housing and Community Services (HCS), CAO, SCTA, TPW and Consultant)
- June 5, 2020 – Final Draft VMT Guidelines
- June 12, 2020 – VMT webpage (soft launch) (<https://srcity.org/VMT>)
- July 1, 2020 – VMT required for CEQA per OPR
- October 1, 2020 – VMT Process Review (How’s it working)