Agenda Report

MEETING DATE: **Tuesday, September 27, 2022**

TO: **City Council**

FROM: **COMMUNITY DEVELOPMENT DIRECTOR MERRIAM**
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THROUGH: **CITY MANAGER MENDEZ**

SUBJECT: **RESOLUTION APPROVING VEHICLE MILES TRAVELED POLICY**

STATEMENT OF ISSUES

On September 6, 2022, the Planning Commission of the City of Watsonville adopted Resolution No. 14-22 (PC), recommending the City Council adopt a Vehicle Miles Traveled (VMT) Policy establishing VMT as the appropriate metric for evaluating transportation-related impacts under the California Environmental Quality Act (CEQA).

RECOMMENDED ACTION

Staff recommends that the City Council adopt a Resolution:

1) Approving a VMT Policy inclusive of establishing VMT as the appropriate metric for evaluating transportation-related impacts under CEQA, establishing VMT thresholds of significance, establishing screening criteria, establishing Transportation Demand Management (TDM) strategies, and establishing a VMT Mitigation Banking Program; and
2) Authorizing the Community Development Director to update the VMT thresholds of significance for land use projects and plans; and
3) Finding the approval of a VMT Policy, including the VMT Mitigation Banking Program is not a "project" under CEQA, or if a "project," exempt under the "common sense" exception (14 Cal. Code Regs. § 15061(b)(3)).

BACKGROUND

The California Environmental Quality Act requires public agencies responsible for approval of land use projects and construction of transportation projects to assess their anticipated environmental impacts and to select project alternatives or implement mitigation measures that lessen those impacts where feasible.[1] Known as a "lead agency" under CEQA, a public agency with the discretionary authority to approve or deny a project (or to carry it out

[1] Cal. Pub. Res. Code § 21100 *et seq.* See 14 Cal. Code Regs. §§ 15000 *et seq.* (CEQA Guidelines).

directly) generally must analyze the proposed project's impacts to the physical environment, identify alternatives and mitigation measures, and approve a project alternative and/or mitigation measures that substantially reduce significant impacts, unless those measures are infeasible due to economic, social, or other conditions.[2]

In 2013, state law was changed with the passage Senate Bill (SB) 743 (Steinberg) to update the way transportation impacts are analyzed under CEQA for new land use and transportation projects. Previously, transportation analyses had been based on automobile delay, typically measured as "level of service," or LOS. SB 743 also required the Governor's Office of Planning and Research (OPR) to develop a new metric for evaluating transportation impacts other than LOS 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 2018, after five years and over 200 public meetings and other outreach events, OPR released updates to the state's CEQA Guidelines to implement SB 743 by replacing LOS with VMT as the most appropriate measure of a project's transportation impacts; this update was formally certified and adopted by the California Natural Resources Agency and codified as section 15064.3 of the CEQA Guidelines (Attachment 1). Simultaneously, OPR released a Technical Advisory on Evaluating Transportation Impacts in CEQA (Attachment 2). The Technical Advisory includes recommendations for thresholds of significance for evaluating impacts of office, residential and retail developments, and provides screening criteria for identifying the types of projects that can be presumed to have a less than significant impact.

In order to comply with SB 743, the City of Watsonville joined the Cities of Capitola, Santa Cruz, and Scotts Valley and the County of Santa Cruz to collectively approach this new paradigm of measuring transportation impacts for the purposes of conducting environmental review. The Cities and County hired Kimley Horn & Associates, a transportation consulting firm, to assist with the necessary work, including updating baseline traffic conditions, updating and running the county-wide Travel Demand Model, creating screening maps, and producing thresholds of significance for the Santa Cruz region. This work forms the foundation of the City's proposed VMT Policy, and was used by other jurisdictions within our region that have adopted VMT thresholds of significance and SB 743 guidelines in conformance of with section 15064.3 of the CEQA Guidelines and OPR's Technical Advisory.

In preparation for adopting a VMT Policy, staff gave an informational presentation to the Planning Commission in March 2020 (presentation slides, minutes) and maintains a website on the topic (link). On September 6, 2022, staff introduced the proposed VMT Policy for consideration by the Planning Commission. At the conclusion of the public hearing, the Planning Commission adopted Resolution No. 14-22 (PC), recommending the City Council adopt a VMT Policy inclusive of establishing VMT as the appropriate metric for evaluating transportation-related impacts under CEQA, establishing VMT thresholds of significance, establishing screening criteria, establishing TDM strategies, and establishing a VMT Mitigation Banking Program.

[2] Cal. Pub. Res. Code §§ 21100 (state agencies), 21151 (local agencies); Cal. Pub. Res. Code § 21002.1 (project selection and feasibility).

DISCUSSION

SB 743 Intent

The intent of SB 743 is to bring CEQA transportation analyses into closer alignment with other statewide policies regarding greenhouse gases, complete streets, and smart growth. As of July 1, 2020, automobile delay and LOS may no longer be used as the performance measure to determine the transportation impacts of land development projects under CEQA. Using VMT as a performance measure instead of LOS is intended to discourage suburban sprawl, reduce greenhouse gas emissions, and encourage the development of smart growth, complete streets, and multimodal transportation networks. Previously, when using LOS, the environmental impact analysis process could impede infill and other beneficial projects.

In changing the way that transportation impacts are measured under CEQA, SB 743 is removing a hurdle to building new development in a way that allows Californians more options to drive less. This change should help achieve the state's climate commitments, discourage greenfield development, preserve more of the environment, improve health and safety, and boost local economies by prioritizing co-located jobs, services, and housing. On average, it should also reduce the time spent driving to get places and foster more choices for how people travel, which would help to promote business, provide access to opportunity, and improve quality of life in one's community and across the state.

LOS and VMT

"Level of service," or LOS, is a measure of delay or congestion. It is based on a road's volume-to-capacity and measures a driver's perception of convenience. As shown in Table 1, a road that has free-flowing traffic—i.e., no delay—is given a LOS of "A"; whereas, a road where drivers experience a delay of 80 second or more is graded LOS "F." Previously, a project's contribution to a roadway's LOS was treated as an *environmental* impact. And if a project was determined to generate a large number of new trips, that say reduced the LOS of an intersection from "C" to "D," it would often have to *mitigate* this impact by increasing the capacity of the intersection or nearby roadway segments. Increasing a roadway's capacity, however, has the unintended effect of often *inducing* further driving without reducing congestion because of pent up desire for travel known as *latent demand*.[3,4]

[3] "Induced travel" refers to an increase in total vehicle mileage due to roadway improvements that increase vehicle trip frequency and distance, but exclude travel shifted from other times and routes. For more information, see *Generated Traffic: Implications for Transport Planning* by Todd Litman.

[4] "Latent demand" refers to additional trips that would be made if travel conditions improve (i.e., less congested roads, higher design speeds, lower vehicle costs or tolls). For more information, see *Generated Traffic: Implications for Transport Planning* by Todd Litman

TABLE 1 LOS Criteria for Signalized Intersections[1]

LOS	Control Delay (seconds/vehicle)	Travel Speed at % Free-Flow Speed
A	≤ 10	> 85
B	> 10 and ≤ 20	> 67 and ≤ 85
C	> 20 and ≤ 35	> 50 and ≤ 67
D	> 35 and ≤ 55	> 40 and ≤ 50
E	> 55 and ≤ 80	> 30 and ≤ 40
F	> 80	> 30

Notes:
1. Adapted from the 2000 and 2010 *Highway Capacity Manual* for urban streets.

"Vehicle Miles Traveled," or VMT, is a measure of the amount and distance people travel by car. Therefore, switching from LOS to VMT changes the transportation impact analysis from people's perception of convenience to an evaluation of the amount and distance that a project might cause people to drive and the associated greenhouse gas emissions released into the environment.

VMT Policy

Now that the primary consideration in transportation environmental analysis under CEQA must be the amount and distance that the project might cause people to drive, any Environmental Impact Report (EIR) and Negative Declaration circulated for public review are required to consider VMT when determining whether a project may cause a significant impact. Staff has proposed a VMT Policy document setting forth guidelines for how the City shall implement SB 743 in compliance with the updated CEQA Guidelines (Attachment 3).

A description of key provisions are summarized below.

Thresholds of Significance

Lead agencies under CEQA may establish thresholds of significance for the purpose of determining whether a project may cause a significant effect.[5] When adopting or using thresholds of significance, a lead agency may consider recommendations by other public agencies or experts, provided that they are supported by substantial evidence. For land use projects, 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 greenhouse gas reduction goals.[6,7] The proposed VMT Policy includes establishing the following thresholds of significance based on OPR's recommendations:

[5] 14 Cal. Code Regs. 14 §§ 15064(b)(2), 15064.7(b).
[6] OPR (2018), *OPR Technical Advisory on Evaluating Transportation Impacts in CEQA*, p. 10. For additional information, refer to pages 10-12 in Attachment 2.
[7] In its document *California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals* (2019), CARB assessed VMT reduction per capita consistent with its evidence-based modeling scenario that would achieve State climate goals of 40 percent GHG emissions reduction from 1990 levels by 2030 and 80 percent GHG emissions reduction levels from 1990 by 2050. CARB found that overall per-capita vehicle travel would need to be approximately 14.3 percent

- **Residential projects:** 15% below existing county-wide average VMT per capita[8]
- **Office projects:** 15% below existing county-wide average Work VMT per employee[9]
- **Retail projects:** No net increase (based on county-wide VMT)[10]
- **Other customers:** No net increase (based on county-wide VMT for similar land uses)
- **Other employment:** 15% below existing county-wide average Work VMT per employee for similar uses

As shown in Table 2, currently the per employee average VMT for work-related commute trips to office land uses is 7.4 miles. The per capita average VMT for residents is a little greater at 8.9 miles. While VMT thresholds will remain the same, the VMT averages will be updated periodically based on additional available travel data, improved VMT modeling, and changes in driving behavior (e.g., shifting modes from driving far distances or alone to shorter distances or using an alternative mode of transportation, such as walking, bicycling and taking transit).

TABLE 2 VMT for Residential and Office Land Uses

Land Use	VMT	Basis
Residential	8.9 VMT/capita[11]	15% below existing county-wide average VMT per capita
Office	7.4 Work VMT/employee[12]	15% below existing county-wide average Work VMT per employee

If a project is not screened out with the criteria outlined, as further described below, then it is subject to a detailed VMT analysis. Should a project exceed the threshold of significance, a menu of accepted Transportation Demand Management (TDM) strategies are available to reduce the project's VMT to an acceptable level, which are described in detail in Appendix C of Attachment 3. Since TDM measures may feasibly reduce VMT up to 15 percent, there will be times when a project will need additional options for mitigating its VMT impacts. Therefore, the VMT Policy also includes a VMT Mitigation Banking Program to help address the need for additional VMT mitigation.

Screening Criteria

The proposed VMT Policy includes screening criteria for determining whether certain types of projects may be presumed to not result in a significant impact. Projects that meet one or more of these criteria would be "screened out" from having to conduct further detailed VMT

lower than existing levels. Therefore, below this level, a project could be considered low VMT and would, on that metric, be consistent with 2017 Scoping Plan Update assumptions that achieve state climate goals.

[8] OPR recommends using a 15 percent below existing VMT per capita as a threshold of significance, because a residential project measured in this way should not cumulatively exceed the population or number of units specified for Watsonville in the MTP/SCS. Conversely, projects that result in greater-than-planned development above the county-wide threshold would undermine the VMT containment needed to achieve regional targets under SB 375. For additional information, refer to VMT Thresholds of Significance on page 8 in Attachment 3 and Recommended Numeric Thresholds for Residential, Office, and Retail Projects on page 15 in Attachment 2.

[9] Similarly, OPR recommends using a 15 percent below existing VMT per employee as a threshold of significance, because office projects that would generate vehicle travel above this threshold would likely indicate a significant transportation impact. For additional information, refer to VMT Thresholds of Significance on page 8 in Attachment 3 and Recommended Numeric Thresholds for Residential, Office, and Retail Projects on page 16 in Attachment 2.

[10] Because new retail development typically redistributes shopping trips rather than create new trips, basing a threshold of significance on the total change in VMT—i.e., the difference in total VMT in area affected with and without the project—is recommended by OPR as the way to analyze a retail project's transportation impacts. For additional information, refer to Recommended Numeric Thresholds for Residential, Office, and Retail Projects on page 16 in Attachment 2.

[11] Residential VMT specifically applies to all home-based trips as represented in the Travel Demand Model. Refer to Appendix A in Attachment 3 for additional information.

[12] Work VMT specifically applies to commute trips as represented in the Travel Demand Model. Refer to Appendix A in Attachment 3 for additional information.

analysis. The following is a summary of the screening criteria based on project size, maps, transit availability, local-serving retail, and provision of affordable housing. These criteria were developed in accordance with OPR's Technical Advisory on evaluating transportation impacts in CEQA.

- **Small Projects.** If a project generates or attracts less than 110 trips per day, and is consistent with the General Plan and Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), that project may be presumed to cause a less-than-significant transportation impact.

- **Proximity to Transit Stations.** Lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop[13] or an existing stop along a high-quality transit corridor[14] will have a less-than-significant impact on VMT. This presumption would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT, as might be the case if the project has a floor area ratio (FAR)[15] of less than 0.75, includes parking in excess of requirements, is inconsistent with local and regional plans (i.e., the General Plan and MTP/SCS), or replaces affordable units with a smaller number of market rate units.

- **Local-Serving Retail.** If a project includes a retail component with a floor area[16] up to 50,000 square feet and is considered local serving, the project would result in a net decrease in VMT and may be presumed to cause a less-than-significant transportation impact. New retail development typically *redistributes* shopping trips rather than *create* new trips. Because of this fact, adding retail opportunities will often shorten the distance people drive to shop and, thereby, reduce VMT. Generally, however, retail development consisting of stores larger than 50,000 square feet are considered regional-serving. Unlike local-serving retail development, regional-serving retail development often leads to the substitution of shorter trips for longer ones, resulting in a net increase in VMT.

- **Affordable Residential Development.** Adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT. Projects that are 100% affordable residential development, or the residential component of a mixed-use development, in infill locations are presumed to have a less than significant impact on transportation under CEQA. Furthermore, a project which includes any affordable residential units may factor the effect of the affordability on VMT into the assessment of VMT generated by those units.

[13] A "major transit stop" means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (Cal. Pub. Res. Code § 21064.3).
[14] A "high-quality transit corridor" means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours (Cal. Pub. Res. Code § 21155).
[15] "Floor area ratio," or FAR, means the total area of a building on a lot divided by the total area of the lot (Watsonville 2005 General Plan Glossary, p. 210; WMC § 14-18.362).
[16] "Floor area" is defined as the total gross footage of a building or structure, but not including any area within the building used for required off-street parking (Watsonville 2005 General Plan Glossary, p. 210; WMC § 14-18.358).

- **Local Essential Service.** Similar to local-serving retail, the addition of necessary local in-person services will reduce VMT given that trips to these locations will be made irrespective of distance given their inelastic, non-discretionary nature. The following types of projects are presumed to cause a less-than-significant transportation impact: day care centers, public K-12 schools, police or fire facilities, medical/dental offices, assisted living/memory care facilities, and government offices.

- **Map-Based Screening (Development in Low-VMT Areas).** Maps showing existing VMT values within a city are referred to as heat maps. These maps display colors representing the level of variation from a local or regional VMT reference average for a jurisdiction. The purpose of these heat maps is to determine if a project could be located in an area with low existing VMT.
  OPR's Technical Advisory indicates that residential and office projects in areas of low VMT, which are compatible with surrounding development in terms of density, mix of uses, and transit accessibility, will exhibit similarly low VMT. Therefore, these projects are presumed to have a less-than-significant VMT impact. OPR's Technical Advisory also recommends using regional as opposed to citywide geographies for reviewing office development, as employees often commute from outside the city boundary to their jobs. Under the recommended approach for map-based screening, projects located in low-VMT areas (zones with VMT that is at least 15% below the regional average VMT) would be presumed to have a less-than-significant transportation impact under CEQA.

The OPR Technical Advisory includes further detailed discussion on each of these screening criteria that are presumed to have a less-than-significant transportation impact (Attachment 2).

VMT Mitigation Banking Program

The proposed VMT Policy includes a VMT Mitigation Banking Program to provide an additional VMT mitigation option. A mitigation bank creates a monetary value for VMT reduction such that a developer could purchase VMT reduction credits, which would allow a project's transportation impacts to be reduced below applicable VMT thresholds. The underlying VMT Banking Projects identified in the proposed Policy may be either regionally or locally beneficial to the area in which the project is located. This option is needed because TDM measures often have limited effectiveness in suburban settings like Watsonville, which has fairly low-density development patterns and limited transit service.

The City will set up a separate account for the purpose of tracking the collection of payments into the VMT Mitigation Banking Program. This account will be monitored by the City Engineer to ensure purchased VMT credits are used for constructing appropriate projects to achieve the intended VMT reduction. As part of the annual Capital Improvement Program (CIP) reporting to Planning Commission and City Council, the City Engineer shall include a progress report on any funds accumulated in the VMT Mitigation Banking Program and expenditures on constructing or improving active transportation facilities providing additional VMT-reducing investments that would not have occurred if this funding

were not available. The VMT Banking Projects identified in the proposed VMT Policy will also be periodically updated.

Planning Commission Comments

During the September 6th Planning Commission meeting, the Commissioners all reviewed the proposed VMT Policy and provided comments. Of particular note where comments from Commissioner Rojas and Kammer.

Commissioner Rojas inquired about the VMT Mitigation Banking Program and posed a hypothetical example to understand whether a developer would be charged a fee if the transportation impact analysis for a new project was determined to be above the relevant VMT threshold. In response, staff clarified that the VMT Mitigation Banking Program provided another *option* for mitigating transportation-related impacts. A developer may choose to purchase VMT reduction credits for mitigating the project's VMT impact, which in turn would serve as a new funding source for building new trails identified in the City's Trails & Bicycle Master Plan (2012).

In responding to Commissioner Rojas' follow-up question about whether or not a developer agrees to pay a fee for mitigating transportation-related impacts, staff noted that not doing so and going the EIR route would be more expensive, take more time, and may have other CEQA related implications (e.g., having to make findings of significant and unavoidable impact).

Commissioner Kammer recommended that Planning Commissioners and City Council members review the proposed trails and bicycle network map in the Trails & Bicycle Master Plan.[17] Commissioner Kammer further noted that she supports the establishment of a VMT Mitigation Banking Program that could fund trail projects, which would both provide a better connected trail network and help meet the City's climate goals.

Public Comments

No public comments were received at the Planning Commission hearing relating to the proposed VMT Policy.

Subsequent Updates

The City may update the VMT thresholds and methodology on an as needed basis to reflect changes in CEQA requirements, new methodological refinements, or other process improvements moving forward. As such, the City should periodically review these SB 743 implementation guidelines and project developers and transportation consultants should contact the City to ensure that they are applying current City requirements for evaluating VMT impacts under CEQA.

Environmental Review

The proposed VMT Policy, including the VMT Mitigation Banking Program, is consistent with state law, in that it would allow the City to implement SB 743 in accordance with OPR's

[17] See Figure 3-1: Greater Watsonville Trail Master Plan on page 39 of the City's *Trails & Bicycle Master Plan for the Watsonville Scenic Trail Network* (2012), which is available on the City's website at: https://www.cityofwatsonville.org/774/Urban-Greening-Plan.

technical guidelines on evaluating transportation impacts in CEQA. The adoption of a VMT Policy is not a "project" as defined in section 15378 of the CEQA Guidelines and Public Resources Code section 21065, as this is not a "project" that may cause a direct, or reasonably foreseeable indirect, physical change in the environment. The VMT Policy is an administrative activity of the City, providing guidance to property owners, project developers, applicants and proponents for determining the significance of transportation impacts of land use projects. The VMT Policy would not approve any specific development and would therefore not lead to any particular physical change to the environment. Moreover, even if found to be a "project," the VMT Policy is exempt under the "common sense" exception (14 Cal. Code Regs. § 15061(b)(3)) because it can be seen with certainty that there is no possibility that the action of adopting the Policy would have a significant effect on the environment.

CONCLUSION

SB 743 changed the way that transportation impacts are evaluated under CEQA. The Planning Commission adopted Resolution No. 15-22 (PC) recommending the City Council adopt the proposed VMT Policy for analyzing VMT in accordance with SB 743 and CEQA. The proposed VMT Policy provides guidelines for how a land use or transportation project would be evaluated in accordance with this state law and OPR's Technical Advisory on evaluating transportation impacts. The proposed VMT Policy removes automobile delay as a significant impact on the environment and replaces it with a VMT threshold for all CEQA environmental determinations.

STRATEGIC PLAN

The purpose of the City of Watsonville's 2021-2023 Strategic Plan is to help the City prioritize its efforts, allocating both fiscal and human resources to achieve a shared vision and goal. The 2021-23 Strategic Plan identifies seven goals, concerning housing, fiscal health, infrastructure and environment, economic development, community engagement and well-being, public safety, and efficient and well-performing government.

Approval of the VMT Policy is consistent with the City Council's goal for housing, infrastructure and environment, and economic development, in that the VMT Policy would remove barriers to affordable housing development and encourage infill development to increase the number of jobs, services, and housing in close proximity to one another.

FINANCIAL IMPACT

The VMT Policy would have no direct fiscal impact on the City. Indirect costs associated with staff time in coordinating the environmental review for land use projects would be covered under a reimbursement agreement with the developer. Indirect costs with administering the VMT Mitigation Banking Program would be borne by the Public Works and Utilities Department, as with any efforts involving infrastructure investments, such as trail improvement projects and other active transportation projects.

ALTERNATIVES

The City Council may choose to not adopt the proposed VMT Policy. However, SB 743 would still obligate the City to evaluate transportation-related impacts under CEQA using VMT as the appropriate metric instead of LOS. The City would also not have established a VMT Mitigation Banking Program to provide an additional option for projects needing to reduce VMT impacts below applicable thresholds.

ATTACHMENTS

1. Section 15064.3 of the CEQA Guidelines
2. Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR, December 2018)
3. Analyzing VMT for CEQA Compliance: SB 743 Implementation Guidelines for the City of Watsonville (City of Watsonville, September 27, 2022)
4. Resolution No. 14-22 (PC)

An electronic copy of the VMT Policy will be available on the City's website at: https://www.cityofwatsonville.org/DocumentCenter/Index/157

REFERENCES

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