



CITY OF POMONA

PLANNING COMMISSION

DATE: May 27, 2020

TO: Planning Commission

FROM: Anita D. Gutierrez, AICP, Development Services Director

SUBJECT: Adoption of Thresholds of Significance for Vehicle Miles Traveled (VMT)

RECOMMENDATION

Staff recommends that the Planning Commission adopt the attached Resolution (Attachment 1) recommending City Council approval of the draft VMT Baselines and Thresholds of Significance.

SUMMARY

Changes in State law related to the California Environmental Quality Act (CEQA) require lead agencies adopt new thresholds of significance for transportation impacts. For the purposes of CEQA environmental determinations, these changes will modify how the City evaluates projects for transportation impacts. Specifically, the City is required to employ Vehicle Miles Traveled (VMT) instead of Level of Service (LOS) as the metric to evaluate transportation impacts in environmental documents. As an approving and recommending body for land use projects and CEQA environmental determinations, the Planning Commission is required to use VMT analysis for land use decisions and environmental impacts. With guidance provided through an implementation process led by the San Gabriel Council of Governments (SGVCOG), Staff has prepared a draft Resolution with new thresholds of significance for consideration by the Planning Commission and recommendation for City Council adoption.

BACKGROUND

The passage of Senate Bill (SB) 743 (Steinberg, 2013) changes how transportation impacts are measured under CEQA in the review of land use and transportation plans and projects. SB 743 removed automobile delay, or LOS, as the primary measure of transportation impacts of environmental significance, and required the Governor's Office of Planning and Research (OPR) to develop revisions to CEQA Guidelines establishing criteria for determining the significance of transportation impacts. OPR subsequently selected VMT as the preferred metric to comply with SB 743. The State's goal in changing the metric used to determine a significant transportation impact is to encourage land use and transportation decisions that reduce greenhouse gas emissions, encourage infill development, and improve public health through active transportation.

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As a result of these changes, lead agencies are required to analyze project-related VMT to determine whether transportation impacts from a given development would constitute a significant environmental impact under CEQA beginning July 1, 2020. In order to properly evaluate impacts, it will be necessary for lead agencies to establish methodologies and quantified thresholds from which to determine levels of significance. The City currently has no methodology or mechanism in place to transition to these new requirements.

On April 6, 2020, the City Council approved a Memorandum of Agreement (MOA) with SGVCOG to participate in the San Gabriel Valley Regional VMT Analysis Model, along with 25 other cities in the San Gabriel Valley. Staff will utilize the Model to analyze project-related VMT to determine whether transportation impacts from proposed development will constitute a significant environmental impact under CEQA.

Through a comprehensive Request for Proposals (RFP) process, SGVCOG selected Fehr and Peers to provide professional consultant services to complete the San Gabriel Valley Regional VMT Analysis Model. The Model analyzes existing traffic conditions in the region to arrive at a baseline standard from which to determine significance thresholds for future land use and transportation projects.

On May 13, 2020, Staff in coordination with Fehr and Peers conducted a workshop with the Planning Commission to familiarize the Commission with this topic and receive input. The Commission's primary questions related to the available mitigation measures for projects that exceed the adopted thresholds. The City Council is scheduled to consider the draft VMT Threshold Resolution for adoption on June 15, 2020, before the July 1, 2020 deadline to begin using VMT as a metric for transportation impacts.

ANALYSIS

Methodology and VMT Thresholds of Significance

Working with Fehr and Peers, staff recommends the following methodology and VMT thresholds of significance.

Project Screening Criteria

- *Project Type* – Retail projects up to 50,000 sf and projects with less than 110 daily trips. This recommendation is consistent with OPR guidance to screen out retail projects up to 50,000 sf in floor area and projects generating less than 110 daily trips.
- *Low VMT* – 15% below the Baseline VMT metrics. This recommendation is consistent with OPR guidance to screen out residential and office projects located in low VMT areas.
- *Transit Priority Areas* – Projects in Transit Priority Areas are locations within one-half mile of a major transit stop, defined as a site containing an existing rail transit station or

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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

VMT Methodology

- *Baseline (SGVCOG Southeast Subarea) VMT* – Using the subarea as a baseline increases the number of projects that would meet the screening criteria for local-serving land use types. This methodology is consistent with OPR guidance, while having the flexibility for the City to be more development friendly.

Project Generated VMT Methodology

- *Productions/Attractions (PA) for single use* – Productions are land use types that generate trips (residences) and attractions are land use that attract trips (employment). This methodology allows project VMT to be evaluated based on trip purpose, but it does not account for trips with one trip end outside the model boundary. The PA methodology only works for individual uses and is not recommended for mixed-use projects as the internalization between uses is not captured in the estimates.
- *Origin/Destination (OD) for mixed-use* – Origins are all vehicle trips that start in a specific traffic analysis zone, and destinations are all vehicle trips that end in a specific traffic analysis zone. This methodology accounts for all trips, including external trips that have one trip end outside of the model boundary, and therefore provides a more complete capture for all travel within the study area; however, the model cannot keep track of trips by trip purposes separately. The OD methodology estimates VMT consistent with VMT estimates in other sections (Air Quality, Greenhouse Gas, Noise and Energy) of an EIR.
- *Thresholds of Significance* – Staff recommends a threshold of 15% below the Baseline SGVCOG Southeast Subarea VMT metrics. This recommendation is consistent with OPR guidance to screen out residential and office projects located in low VMT areas. The Baseline SGVCOG Southeast Subarea VMT is defined as the average VMT for the area represented by the San Gabriel Valley Council of Governments, as measured by VMT per capita, VMT per employee, or VMT per service population. A project's VMT will be compared to the Baseline SGVCOG Southeast Subarea VMT when determining potential significant impacts. Threshold of significant would be as follows:
 - *Land Use Plans*: Significant impacts would occur if the VMT per service population for the land use plan exceeds the current Baseline SGVCOG Southeast Subarea VMT.
 - *Land Use Projects*: Significant impacts would occur if a project generates VMT (per capita, per employee, or per service population) more than 15% below the Baseline SGVCOG Southeast Subarea VMT.
 - *Retail Project*: Significant impacts would occur if a project generates VMT (per capita, per employee, or per service population) more than 15% below the

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Baseline SGVCOG Southeast Subarea VMT; or if there is a net increase in total VMT within the boundary.

- *Transportation Projects*: Significant impacts would occur if there is a net increase in total VMT within the boundary.

Mitigation Measures

Although not required as part of the adoption of thresholds of significance for VMT, mitigation measures will ultimately need to be incorporated for projects that exceed the adopted thresholds to minimize impacts. The starting point for VMT mitigation is to consider whether modifying the project in some way could reduce VMT. The two basic modifications include transportation demand management (TDM) strategies or changing the physical land use or transportation network design of the project such that residents, workers, or visitors of the site could make fewer or shorter vehicle trips. Beyond project site changes or conditions, VMT mitigation programs are also an option that can be considered.

Project Specific

- *Physical Design Changes* – Increasing land use density or changing the project’s mix of uses could result in “internal trip capture” that reduces overall VMT of the site. Developers would be encouraged to design projects with a focus on walking, biking and access to transit. However, this could discourage development in areas where this is difficult to achieve or require substantial changes to development applications that result in significant project implementation delays.
- *Transportation Demand Management (TDM)* – TDM strategies added to a project as mitigation can reduce VMT impacts. Meaningful TDM programs encourage behavioral changes that can lead to VMT reductions beyond the Project. However, successful TDM programs require compliance monitoring, especially as tenants/operators change overtime. TDM compliance monitoring can add staffing and costs to agencies unless a TDM monitoring program funded by participants is implemented and maintained. TDM strategies as identified in the California Air Pollution Control Officers Association (CAPCOA) study “Quantifying Greenhouse Gas Mitigation Measures” include the following:
 - Increase diversity of land uses
 - Provide pedestrian network improvements
 - Provide traffic calming measures and low-stress bicycle network
 - Implement car-sharing and ride-sharing programs
 - Encourage telecommuting and alternative work schedules
 - Increase transit accessibility
 - Transportation Management Organization
 - Parking management

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VMT Fee Programs

- *Traffic/Transportation Impact Fee Programs* – Cities can amend existing or create new VMT mitigation programs by amending or preparing a nexus study to reduce VMT consistent with the City's goal and CEQA thresholds. The amended or new fee program would focus on transit, bicycle, and pedestrian projects. This requires a new nexus study to develop and implement the fee program, as well as monitoring and maintenance to ensure proper use of fees collected and expended pursuant to State law.
- *VMT Mitigation Exchange* – Developers select from a pre-approved list of mitigation projects in the City or larger area, such as SGVCOG. The program operator match the developer's needed VMT reduction with a specific project. Developer then funds the identified project.
- *VMT Mitigation Bank* – Pools fees from development projects across multiple jurisdictions to spend on larger scale mitigation projects. Developer pays into the fee program and projects are implemented by others. The regional nature of this program has the potential for more significant reduction in VMT.

ENVIRONMENTAL ANALYSIS

This Resolution has been assessed in accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the environmental regulations of the City. The adoption of new local CEQA thresholds of significance for transportation impacts and the adoption of new Local Transportation Assessment Guidelines will not have a significant environmental impact and are exempt from the CEQA pursuant to Section 15308 of Title 14 of the California Code of Regulations because the two actions are undertaken by the City for the protection of the environment. The revised CEQA thresholds will be compliant with a State mandate (SB 743) and will be used in a regulatory process (CEQA process) that involves procedures for the protection of the environment. Accordingly, the City Council will consider the recommendation to find the Resolution exempt from the environmental review requirements of CEQA pursuant to Section 15308 of Title 14 of the California Code of Regulations.

ATTACHMENTS

- 1) Draft PC Resolution