



BOARD OF SUPERVISORS
AGENDA LETTER

Agenda Number:

Clerk of the Board of Supervisors
105 E. Anapamu Street, Suite 407
Santa Barbara, CA 93101
(805) 568-2240

Department Name: Planning and Development
Department No.: 053
For Agenda Of: 09/15/2020
Placement: Departmental
Estimated Time: 1 hour on 09/15/2020
Continued Item: N/A
If Yes, date from: N/A
Vote Required: Majority

TO: Board of Supervisors

FROM: Department Lisa Plowman, Director, Planning and Development
Director (805) 568-2086
Contact Info: Daniel T. Klemann, Deputy Director, Long Range Planning
(805) 568-2072

SUBJECT: CEQA Transportation Impact Thresholds Update to Comply with Senate Bill (SB) 743

County Counsel Concurrence

As to form: Yes

Other Concurrence

As to form: N/A

Recommended Actions:

That the Board of Supervisors (Board):

- a) Determine that the amendment to the *Environmental Thresholds and Guidelines Manual* is not a project pursuant to CEQA Guidelines Sections 15060(c)(3) and 15378(b)(5) (Attachment 1); and
- b) Adopt a resolution approving the proposed amendment to the *Environmental Thresholds and Guidelines Manual* (Attachment 2).

Please refer the matter to staff if the Board takes other than the recommended actions for the development of appropriate materials and/or a report on the budgetary and other impacts that the Board's actions would have on the Long Range Planning Division Work Program.

Summary Text:

SB 743 and, subsequently, CEQA Guidelines Section 15064.3, changed transportation impact analyses under CEQA. Specifically, CEQA Guidelines Section 15064.3(a) states "vehicle miles traveled [VMT] is the most appropriate measure of transportation impacts." With this change, the County may no longer use automobile delay, as measured by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, as the basis for determining the significance of transportation impacts under CEQA. The Planning and Development Department (P&D) prepared the proposed amendment

Auditor-Controller Concurrence

As to form: N/A

to the *Environmental Thresholds and Guidelines Manual* to shift from LOS to VMT-based metrics, consistent with SB 743 and CEQA Guidelines Section 15064.3 (Attachment 2). P&D and the County Planning Commission recommend that that Board adopt the proposed amendment.

Besides the information in this board letter, the proposed amendment (Exhibit 1 to Attachment 2), Planning Commission staff report (Attachment 6), and VMT report, titled *Transportation Analysis Updates in Santa Barbara County* (Attachment 4), provide more details. The proposed amendment contains a step-by-step guide for analyzing transportation impacts under CEQA. The *Transportation Analysis Updates in Santa Barbara County* contains background and technical information regarding the proposed VMT methodologies, thresholds of significance, and mitigation measures.

Background:

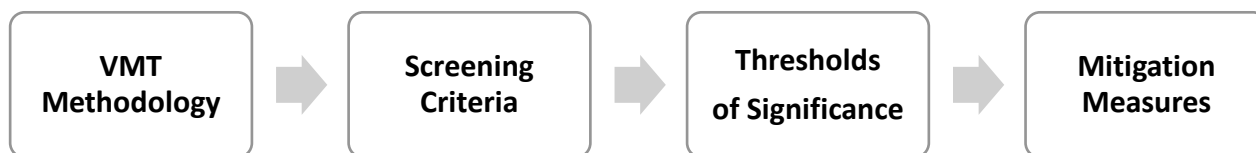
Purpose and Process

As of July 1, 2020, SB 743 requires public agencies to use VMT rather than LOS to analyze a project's transportation impacts under CEQA. The intent of this change is to reduce per-capita vehicle travel, which, in turn, will help reduce greenhouse gas emissions and combat climate change. The California Natural Resources Agency adopted revisions to CEQA Guidelines Section 15064.3 and Appendix G to implement SB 743. CEQA Guidelines Section 15064.3(a) defines VMT as "the amount and distance of automobile travel attributable to a project."

The proposed amendment replaces the existing LOS-based threshold questions in the *Environmental Thresholds and Guidelines Manual* with the four transportation threshold questions (i.e., "a," "b," "c," and "d") contained in CEQA Guidelines Appendix G. Most planners and environmental professionals are familiar with the metrics in threshold questions "a," "c," and "d," which address policy consistency, design features and hazards, and emergency access, respectively. However, threshold question "b" implements SB 743 and requires the County to analyze a project's transportation impacts using VMT-based metrics. Therefore, this board agenda letter focuses on threshold question "b."

Implementing SB 743 and CEQA Guidelines Section 15064.3 is a four-step process. (See Figure 1.) In June 2019, P&D formed an Advisory Group consisting of staff from the County Public Works Department and the Santa Barbara County Association of Governments (SBCAG). The Advisory Group and P&D's transportation consultant, Fehr & Peers, used the SBCAG Regional Transportation Demand Model (RTDM) to estimate VMT and develop (1) VMT methodology, (2) screening criteria, (3) thresholds of significance, and (4) potential mitigation measures. Staff also relied on the Governor's Office of Planning and Research's (OPR) "Technical Advisory on Evaluating Transportation Impacts in CEQA" (OPR Technical Advisory) (OPR, 2018) (Attachment 3). The Advisory Group reviewed methodologies and metrics for estimating VMT and recommended screening criteria, thresholds of significance, and mitigation measures.

Figure 1: SB 743 Implementation Process



The provisions of SB 743 and CEQA Guidelines 15064.3 are challenging for rural and suburban parts of the state, like the unincorporated areas of Santa Barbara County. VMT is typically higher in counties than cities. In addition, the common measures to reduce VMT are generally less effective or

infeasible to implement in predominantly suburban and rural areas like the unincorporated areas of the county. Therefore, staff analyzed VMT trends in the region, reviewed existing studies, and tested different screening criteria and thresholds of significance before making recommendations. Figure 2 provides an overview of the recommend VMT analysis process for threshold question “b.”

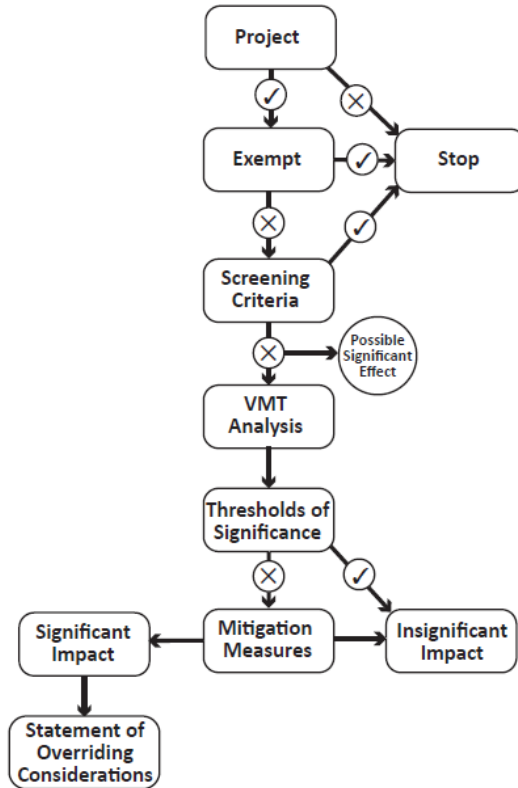
Key Recommendations

The Advisory Group made several key recommendations throughout the four-step process. The following subsections summarize staff’s recommendations for each step in the implementation process. These recommendations generally follow the recommendations of the Advisory Group and those contained in the OPR Technical Advisory.

- VMT Methodology: The County may select methodologies and metrics to estimate VMT. The SBCAG RTDM is the most comprehensive travel model that can estimate VMT at local and regional levels for Santa Barbara County. VMT metrics require a geographic boundary to define the extent of data to select and analyze. Staff recommends using the unincorporated areas of the county (i.e., the entire Santa Barbara County, excluding incorporated cities) as the geographic boundary for estimating existing VMT for land use projects.
- Screening Criteria: The County may adopt screening criteria to identify projects that would result in insignificant VMT impacts early in the environmental review process. Screening criteria identify classes of projects based on size, location, and other factors that would have an insignificant VMT impact, absent substantial evidence to the contrary. Therefore, a detailed VMT analysis (VMT transportation study) is only required for projects that do not meet one of the screening criteria. The OPR Technical Advisory contains VMT impact screening criteria for land use and transportation projects. Staff recommends using the same screening criteria for land use and transportation projects.
- Thresholds of Significance: CEQA Guidelines Sections 15064.3 and 15064.7 encourage lead agencies to develop VMT thresholds of significance. Specifically, CEQA Guidelines 15064.3(b) encourages lead agencies to develop separate VMT thresholds of significance for land use projects, land use plans, and transportation projects. The OPR Technical Advisory recommends lead agencies develop thresholds of significance in relation to existing, or baseline VMT. Accordingly, OPR recommends a threshold of 15 percent below existing VMT for land use projects and plans. Staff recommends adopting the same threshold. CEQA Guidelines Section 15064.3(b)(2) states that transportation projects that reduce or do not increase VMT have less than significant transportation impacts. Therefore, a significant impact would occur if a transportation project results in a net increase in VMT. Staff also recommends adopting this threshold.
- Mitigation Measures: Projects and plans that exceed the applicable threshold of significance require the implementation of feasible project modifications or mitigation measures to avoid or reduce VMT impacts to an insignificant level (i.e., below the applicable thresholds of significance). The OPR Technical Advisory provides potential mitigation measures that can result in a reduction in VMT. Fehr & Peers also helped identify potential mitigation measures to reduce VMT in the unincorporated areas of Santa Barbara County. Fehr & Peers referenced available research to determine the effectiveness of different mitigation measures and presented new concepts for potential mitigation for consideration as part of future planning efforts. Chapter 6, of the report, titled *Transportation Analysis Updates in Santa Barbara County*

(Attachment 4, pages 36 through 40) provides additional information on mitigation measures and concepts.

Figure 2: VMT Analysis Flowchart



Implementation

Staff and Fehr & Peers are developing an Excel-based VMT calculator to simplify the analysis of a land use project’s VMT. The calculator will be available to the public on P&D’s website once complete. It will incorporate screening criteria, thresholds of significance, mitigation measures, and data from the SBCAG RTDM. Users of the VMT calculator tool will enter the project type, location, size, zoning, and other key information into the calculator. The calculator will use this information to estimate the project’s VMT. It will also determine whether the project would meet or exceed the applicable screening criteria and, if necessary, threshold of significance.

In addition to the information in this board agenda letter, the proposed amendment to the *Environmental Thresholds and Guidelines Manual* (Attachment 2) and the related report, titled *Transportation Analysis Updates in Santa Barbara County* (Attachment 4) provide more details. The proposed amendment contains a step-by-step guide for assessing transportation impacts under CEQA. The *Transportation Analysis Updates in Santa Barbara County* contains background and technical information regarding the proposed VMT methodologies, thresholds of significance, and mitigation measures.

LOS-Based Policies and Standards

SB 743 and CEQA Guidelines Section 15064.3 prevent the County from using LOS or similar measures of automobile delay, vehicular capacity, or traffic congestion for determining the significance of transportation impacts under CEQA. Nonetheless, LOS remains an important metric for

transportation planning and projects must still comply with LOS-based policies and standards in the Comprehensive Plan, including any applicable community plan. Therefore, applicants for large or complex projects may still need to submit traffic studies which assess a project's effects on the transportation system and, if necessary, recommend access and/or roadway improvements. The County Public Works Department is updating the County's *Engineering Design Standards* (County of Santa Barbara, Public Works, September 2011). The updated standards will outline the requirements for LOS-based traffic studies that may still be required for development review, land use planning, policy consistency analysis, and other non-CEQA processes.

County Planning Commission Review

The County Planning Commission reviewed the proposed amendments on August 12, 2020. It recommended (4 to 0 vote) that the Board adopt the proposed amendment to the *Environmental Thresholds and Guidelines Manual* (Attachment 2).

Environmental Review

The proposed amendment to the *Environmental Thresholds and Guidelines Manual* is not a project pursuant to CEQA Guidelines Sections 15060(c)(3) and 15378(b). Therefore, the proposed amendment is not subject to CEQA. Please refer to the Notice of Exemption for additional information (Attachment 1).

Fiscal and Facilities Impacts:

Budgeted: Yes

Funding for this project is budgeted in the P&D's Long Range Planning Division Budget Program on page D-294 of the County of Santa Barbara Adopted Budget, FY 2020-2021. To date, staff time to prepare the proposed amendment totals approximately 1,040 hours (\$90,890). In addition, professional services costs total approximately \$91,420. There are no facilities impacts.

Special Instructions:

The P&D will satisfy all noticing requirements.

The Clerk of the Board shall forward a copy of the minute order and an executed copy of the resolution to the P&D, attention Mark Friedlander.

Authored by:

Mark Friedlander, Senior Planner, Long Range Planning Division, (805) 568-3532

Attachments:

1. Notice of Exemption
2. Board Resolution Amending Chapter 18, Thresholds of Significance for Transportation Impacts, of the *Environmental Thresholds and Guidelines Manual* (Exhibit 1)
3. *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR, December 2018)
4. Transportation Analysis Updates in Santa Barbara County (P&D and Fehr & Peers, July 2020)
5. County Planning Commission Action Letter and Resolution dated August 12, 2020
6. County Planning Commission Staff Report dated August 4, 2020