

COUNTY OF SANTA BARBARA CALIFORNIA

PLANNING COMMISSION

COUNTY ENGINEERING BUILDING
123 E. ANAPAMU ST.
SANTA BARBARA, CALIF. 93101-2058
PHONE: (805) 568-2000
FAX: (805) 568-2030

TO THE HONORABLE BOARD OF SUPERVISORS
COUNTY OF SANTA BARBARA, CALIFORNIA

PLANNING COMMISSION
HEARING OF AUGUST 12, 2020

RE: CEQA Transportation Impact Thresholds Update to Comply with Senate Bill 743

Hearing on the request of the County of Santa Barbara Planning and Development Department (P&D) for the County Planning Commission to:

1. Receive the report titled *Transportation Analysis Updates in Santa Barbara County* (P&D, July 2020), regarding implementation of Senate Bill (SB) 743¹ (Steinberg, 2013);
2. Recommend that the Board of Supervisors adopt the proposed amendment to the Thresholds of Significance for Transportation Impacts, of the *Environmental Thresholds and Guidelines Manual* (County of Santa Barbara, P&D, August 2020), to comply with SB 743 and the Guidelines for the Implementation of the California Environmental Quality Act (CEQA Guidelines) Section 15064.3, Determining the Significance of Transportation Impacts; and
3. Determine that the proposed amendment is not a project pursuant to CEQA Guidelines Sections 15060(c) and 15378(b).

Dear Honorable Members of the Board of Supervisors:

At the County Planning Commission hearing of August 12, 2020, Commissioner Parke moved, seconded by Commissioner Bridley and carried by a vote of 4-0, to recommend that the Board of Supervisors (Board):

1. Recommend that the Board determine that the amendment to the *Environmental Thresholds and Guidelines Manual* is not a project pursuant to CEQA Guidelines Section 15060(c)(3) and 15378(b)(5); and

¹ Codified in the California Public Resources Code (PRC), Division 12, Chapter 2.7, Section 21099.

2. Adopt a resolution recommending that the Board amend the County of Santa Barbara's *Environmental Thresholds and Guidelines Manual*, to replace the Thresholds of Significance for Transportation Impacts.

Sincerely,



Jeff Wilson
Secretary Planning Commission

cc: Case File
Planning Commission File
Jenna Richardson, Deputy County Counsel
Allen Bell, Supervising Planner
Mark Friedlander, Planner

Attachments: Attachment D – Planning Commission Resolution Recommending Approval
Exhibit 1: Chapter 18, Thresholds of Significance for Transportation Impacts, of
the *Environmental Thresholds and Guidelines Manual*

JW/dmv

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ATTACHMENT D: COUNTY PLANNING COMMISSION RESOLUTION

**RESOLUTION OF THE SANTA BARBARA COUNTY PLANNING COMMISSION
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA**

IN THE MATTER OF RECOMMENDING THAT)
THE BOARD OF SUPERVISORS AMEND THE)
THRESHOLDS OF SIGNIFICANCE FOR)
TRANSPORTATION IMPACTS, OF THE)
COUNTY ENVIRONMENTAL THRESHOLDS)
AND GUIDELINES MANUAL, TO COMPLY) RESOLUTION NO.: 20 – 07
WITH THE STATE GUIDELINES FOR THE)
IMPLEMENTATION OF THE CALIFORNIA)
ENVIRONMENTAL QUALITY ACT.)

WITH REFERENCE TO THE FOLLOWING:

- A. The *Guidelines for the Implementation of the California Environmental Quality Act* (CEQA Guidelines) encourage each public agency to adopt objectives, criteria, and specific procedures consistent with the California Environmental Quality Act (CEQA) and the CEQA Guidelines for administering its responsibilities under CEQA (CEQA Guidelines Section 15022).
- B. The CEQA Guidelines encourage each public agency to develop, publish and adopt thresholds of significance that the agency uses to determine the significance of environmental effects (CEQA Guidelines Section 15064.7(b)).
- C. On September 12, 1988, the Board of Supervisors adopted the *County of Santa Barbara Guidelines for the Implementation of the California Environmental Quality Act*, in order to provide Santa Barbara County (County) agencies, applicants, and the public with definitions, procedures, and forms to implement CEQA and to supplement the CEQA Guidelines; and
- D. The *Thresholds of Significance for Transportation Impacts*, of the County *Environmental Thresholds and Guidelines Manual*, last revised February 2018, defines thresholds of significance for transportation impacts using level of service (LOS) metrics, which measures vehicular capacity and traffic congestion at key intersections; and
- E. The County *Guidelines for the Implementation of CEQA* define a process to amend the County *Environmental Thresholds and Guidelines Manual*, and transmittal of the County Planning Commission’s recommendation to the Board of Supervisors; and

- F. Governor Edmund G. Brown signed Senate Bill (SB) 743 on September 27, 2013, which directed the California Office of Planning and Research and the California Natural Resources Agency to develop updated criteria for measuring transportation impacts using alternative methods that promote: (1) a reduction in greenhouse gases, (2) the development of multimodal transportation, and (3) a diversity of land uses. SB 743 also states “upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by [LOS] or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment;” and
- G. California Public Resources Code Section 21099 codified SB 743, requiring changes to the CEQA Guidelines regarding the analysis of transportation impacts; and
- H. The California Natural Resources Agency certified and adopted changes to the CEQA Guidelines Section 15064.3 that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate transportation impacts, and no longer allowed lead agencies to consider LOS and similar metrics of automobile delay when determining significant impacts on the environment; and
- I. CEQA Guidelines Section 15064.3(c) specifies, “the provisions of the section shall apply statewide beginning on July 1, 2020;” and
- J. Nearly 40 percent of greenhouse gas emissions in unincorporated areas of Santa Barbara County come from the transportation sector. Quantifying and reducing VMT will assist the County in achieving the 2030 greenhouse gas emission reduction targets set by the Board of Supervisors on December 11, 2018; and
- K. By shifting the thresholds of significance metrics from LOS to VMT, the County as a CEQA lead agency will consider potential impacts to transit systems and bicycle and pedestrian networks, as well as the road network; and
- L. VMT-based thresholds of significance encourage multimodal (e.g., bicycle, walking, transit) transportation options and a diversity of land use options to promote alternative transportation; and
- M. The County Planning Commission now finds that it is in the public interest of the County of Santa Barbara to recommend that the Board of Supervisors amend the Thresholds of Significance for Transportation Impacts, of the County’s *Environmental Thresholds and Guidelines Manual*, to be consistent with SB 743, California Public Resources Code Section 21099, and the CEQA Guidelines (Section 15064.3). Exhibit 1 to this County Planning Commission Resolution includes amendments to the Thresholds of Significance for Transportation Impacts, and is incorporated herein by reference; and

- N. The proposed amendments are consistent with the policies of the Santa Barbara County Comprehensive Plan (including the Coastal Land Use Plan) and Chapter 35, Zoning, of the Santa Barbara County Code; and
- O. The *County of Santa Barbara Guidelines for the Implementation of CEQA* (County Guidelines) define a process by which the *Environmental Thresholds and Guidelines Manual* may be amended, which includes two hearings before the County Planning Commission, one in the north county and one in the south county, and transmittal of the Planning Commission's recommendation to the Board of Supervisors.
- P. The Governor of California declared an emergency on March 4, 2020, and issued Stay-at-Home Executive Order N-33-20 on March 19, 2020, to protect the health and well-being of all Californians and to slow the spread of the pandemic coronavirus COVID-19.
- Q. The Governor of California issued Executive Order N-29-20 on March 17, 2020, which authorized local legislative bodies to hold public meetings via teleconferencing and to make public meetings accessible telephonically or otherwise electronically to all members of the public seeking to observe and to address the local legislative body; and such a body need not make available any physical location from which members of the public may observe the meeting and offer public comment, which supersede the process defined in the County Guidelines.
- R. This Commission held a duly noticed public hearing online on August 12, 2020, in compliance with the Governor's executive orders, at which time County staff explained the proposed amendment to the *Environmental Threshold and Guidelines Manual* and invited comments from the attendees of the hearing.

NOW, THEREFORE, IT IS HEREBY RESOLVED as follows:

1. The above recitations are true and correct.
2. In compliance with the *Guidelines for the Implementation of the California Environmental Quality Act of 1970*, Section F.3.b (Process for thresholds amendment and adoption), the Planning Commission recommends that the Board of Supervisors of the County of Santa Barbara, State of California, following the required noticed public hearing, approve and adopt the aforementioned recommendation to amend the Thresholds of Significance for Transportation Impacts of the County's *Environmental Thresholds and Guidelines Manual*.
3. A certified copy of this Resolution shall be transmitted to the Board of Supervisors.

4. The Chair of this Commission is hereby authorized and directed to sign and certify all documents and other materials in accordance with this Resolution to show the aforementioned action by the Planning Commission.

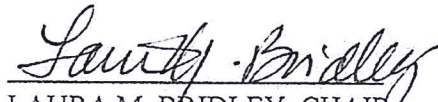
PASSED, APPROVED AND ADOPTED this 12th day of August, 2020, by the following vote:

AYES: Cooney, Bridley, Parke, Ferini

NOES:

ABSTAIN:

ABSENT: Blough


LAURA M. BRIDLEY, CHAIR
SANTA BARBARA COUNTY PLANNING COMMISSION

ATTEST:


JEFFREY WILSON
SECRETARY TO THE COUNTY PLANNING COMMISSION

APPROVED AS TO FORM:

Michael C. Ghizzoni
County Counsel

By 
Deputy County Counsel

EXHIBIT:

1. Amended Chapter 18, Thresholds of Significance for Transportation Impacts, of the *Environmental Thresholds and Guidelines Manual*

18. THRESHOLDS OF SIGNIFICANCE FOR TRAFFIC IMPACTS

A. Introduction.

This chapter describes how to interpret and apply the four transportation threshold questions (i.e., “a,” “b,” “c,” and “d”) contained in the County’s Initial Study Template, Section 4.14, Transportation. 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 recent state laws and requires the County to analyze a project’s transportation impacts using a new metric called “vehicle miles traveled” (VMT). Therefore, this chapter focuses on the screening criteria, thresholds of significance, and transportation studies for VMT and threshold question “b.”

The screening criteria and thresholds of significance for VMT in this chapter reflect two primary sources – Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) and Governor’s Office of Planning and Research’s (OPR) “Technical Advisory on Evaluating Transportation Impacts in CEQA” (OPR Technical Advisory) (OPR, 2018). CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, contains recommendations and mandatory criteria for analyzing a project’s transportation impacts. The OPR Technical Advisory contains general principles and specific recommendations to implement CEQA Guidelines Section 15064.3. It begins with an introduction and background information on VMT. The body of the advisory recommends screening criteria and thresholds of significance for land use projects, land use plans, and transportation projects.

This chapter provides essential information for analyzing transportation impacts under CEQA. It is the result of a comprehensive report prepared by the County and its transportation consultant, Fehr & Peers, titled “Transportation Analysis Updates in Santa Barbara County” (County of Santa Barbara, Planning and Development Department, July 2020). Please see this report for additional information on VMT, screening criteria, thresholds of significance, and other topics that appear in and informed the preparation of this chapter.

B. Background on CEQA Guidelines and Thresholds of Significance.

On December 28, 2018, the California Natural Resources Agency certified and adopted proposed revisions to CEQA Guidelines Section 15064.3 and Appendix G: Environmental Checklist Form, Section XVII, Transportation. Section 15064.3 includes new criteria for determining the significance of a project’s transportation impacts. Specifically, Section 15064.3(a) states “vehicle miles traveled 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.

CEQA Guidelines Section 15064.3(a) defines VMT as “the amount and distance of automobile travel attributable to a project.” Depending on the type of project being analyzed, the VMT calculation can include all vehicle-trips, including passenger and commercial vehicles, or only cars and light-duty trucks. VMT is generally expressed on a daily basis for a typical weekday.

CEQA Guidelines Section 15064.3(c) specifies when these changes take effect. It states, “A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.”

The revisions to Appendix G Section XVII removed references to circulation, traffic levels, and LOS. The revisions also added a new threshold question (i.e., “b”) that considers whether a project would conflict or be inconsistent with the VMT criteria for analyzing transportation impacts in CEQA Guidelines Section 15064.3(b).

Consistent with CEQA Guidelines Section 15064.7, Thresholds of Significance, the County developed and adopted the following thresholds of significance for determining the significance of a project’s transportation impacts. CEQA Guidelines Section 15064.7(a) states, “[a] threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect.” Projects that comply with an applicable threshold will normally have a less than significant effect on the environment. Projects that exceed or otherwise do not comply with an applicable threshold may have a significant effect on the environment and, as a result, may require project modifications or mitigation measures to avoid or reduce those effects to less than significant levels. The following thresholds reflect this general guidance as well as the specific guidance set forth in CEQA Guidelines Section 15064.3 regarding estimating VMT and developing thresholds of significance for VMT and transportation impacts.

C. Transportation Threshold Questions – Overview.

As discussed above, CEQA Guidelines Appendix G, Section XVII, contains four transportation threshold questions to help assess a project’s potential transportation impacts. The County uses these same threshold questions, which include the following:

- a. Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?
- b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)?
- c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- d. Would the project result in inadequate emergency access?

Sections D, E, F, and G, below, describe each threshold question in further detail. The description of threshold question “b” (Section E) contains more detail since VMT is a new metric for analyzing transportation impacts under CEQA.

D. Threshold “a” – Potential Conflict with a Program, Plan, Ordinance, or Policy

The SBCAG’s 2040 Regional Transportation Plan and Sustainable Communities Strategy (SBCAG, 2013) and the County’s Comprehensive Plan, zoning ordinances, capital improvement programs, and other planning documents contain transportation and circulation programs, plans, ordinances, and policies. Threshold question “a” considers a project in relation to those programs, plans, ordinances, and policies that specifically address multimodal transportation, complete streets, transportation demand management (TDM), and other VMT-related topics. The County and CEQA Guidelines Section 15064.3(a) no longer consider automobile delay or congestion an environmental impact. Therefore, threshold question “a” does not apply to provisions that address LOS or similar measures of vehicular capacity or traffic congestion.

A transportation impact occurs if a project conflicts with the overall purpose of an applicable transportation and circulation program, plan, ordinance, or policy, including impacts to existing transit systems and bicycle and pedestrian networks pursuant to Public Resources Code Section 21099(b)(1). In such cases, applicants must identify project modifications or mitigation measures that eliminate or reduce inconsistencies with applicable programs, plans, ordinances, and

policies. For example, some community plans include provisions that encourage complete streets. As a result, an applicant for a multifamily apartment complex may need to reduce excess parking spaces, fund a transit stop, and/or add bike storage facilities to comply with a community plan's goals and policies.

E. Threshold “b” – Potential Impact to VMT

Threshold question “b” establishes VMT as the metric to determine transportation impacts. Because VMT is a new metric, this section begins with background information on VMT and then outlines a three-step process for analyzing and, if necessary, mitigating a project's VMT impacts.

1. Background Information

County VMT

The County uses the Santa Barbara County Association of Governments' (SBCAG) Regional Travel Demand Model (RTDM) to estimate VMT. The RTDM (TransCAD Version 6.0) is a four-step travel demand model that performs the following classical modeling steps:

1. Trip generation (number of trips),
2. Trip distribution (where those trips go),
3. Mode choice (how the trips are divided among the available modes of travel), and
4. Trip assignment (route trips will take).

Each trip forecasted in the RTDM has a purpose, type, origin, and destination. The RTDM estimates and forecasts travel by traffic analysis zones (TAZ) for a 24-hour period¹ on a typical weekday. Approximately 360 TAZs have significant portions within the unincorporated areas of the county.

The SBCAG RTDM requires a geographic boundary to define the extent of data to select and analyze. The County's VMT metrics, described in the subsection below, use the unincorporated areas of the county (entire Santa Barbara County, excluding incorporated cities) as the geographic boundary for estimating VMT. This chapter refers to VMT for the unincorporated areas as “county VMT.” County VMT reflects all vehicle-trips that start and/or end in the unincorporated areas of Santa Barbara County.

SBCAG periodically updates the RTDM's data and functions, such as when it prepares a new regional transportation plan/sustainable community strategy (RTP/SCS). The County uses the most up-to-date version of the RTDM to estimate VMT and evaluate transportation impacts.

Project-Level VMT Calculator

The County and Fehr & Peers developed the Project-Level VMT Calculator to help assess a project's VMT. The VMT Calculator incorporates screening criteria, thresholds of significance, mitigation measures, and data from the SBCAG RTDM. The VMT Calculator is available on P&D's website.

Planners or applicants enter the project type, location, size, zoning, and other key information into the VMT Calculator. The VMT Calculator uses this information to estimate the project's VMT. It then determines whether the project would meet or exceed the applicable threshold

¹ Daily includes: AM, Late AM, Lunch, Early PM, PM, Evening, Late Evening, and Night Time.

of significance. The VMT Calculator can also estimate the effectiveness of possible mitigation measures if the project would exceed the threshold of significance. The County periodically updates the VMT Calculator to use the most up-to-date version of the SBCAG RTDM.

The VMT Calculator can analyze land-use projects that are smaller than one TAZ. However, it does not have the capability to analyze large, complex, and/or unique projects, such as a community plan update, key site rezone and entitlements, a regionally serving retail project, or a regional-serving community center or agricultural processing facility. Such projects will require a VMT transportation study. Subsection I, VMT Transportation Studies, below, outlines the content of a VMT transportation study.

Baseline Environmental Setting

Environmental documents must typically describe the physical setting, or baseline, as it exists when a lead agency publishes a notice of preparation (NOP), or if a lead agency does not publish a NOP, when it commences the environmental review process. To calculate county VMT for every year until 2040, the County interpolated between the SBCAG RTDM's 2010 base year and 2040 future year VMT forecasts to establish specific county VMT values for each year.

VMT Metrics

CEQA Guidelines Sections 15064.3(b)(1) and 15064.3(b)(2) describe the criteria for analyzing transportation impacts for two types of projects: (1) land use projects and (2) transportation projects. The criteria for land use projects may also apply to land use plans. The following subheadings summarize the VMT methodology and metrics for both types of projects.

Land Use Projects and Plans

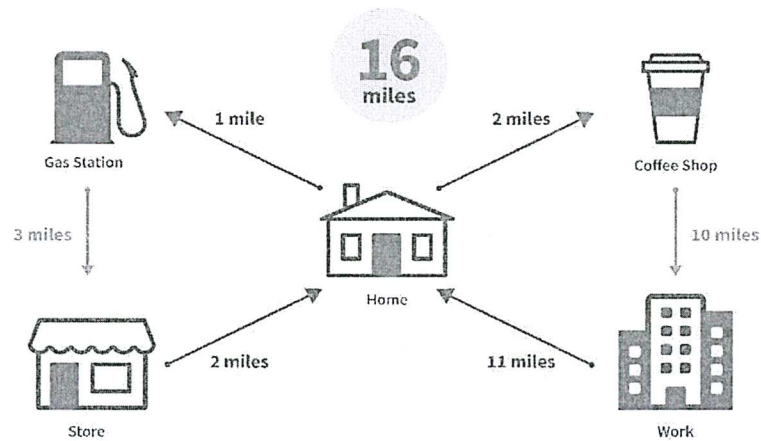
The SBCAG RTDM uses an origin-destination (OD) VMT methodology to estimate the VMT of land use projects and plans. The OD VMT methodology estimates the VMT generated by land uses or plans in a defined geographic area, such as the unincorporated county or a specific project site. The SBCAG RTDM estimates OD VMT by tracking all vehicles traveling to and from a defined geographic area and calculating the number of trips and length of those trips to estimate VMT.

State climate-change legislation typically expresses greenhouse gas emissions reduction targets as a quantitative or absolute numeric threshold. For example, Senate Bill 32 (2016) requires "that statewide greenhouse gas emissions are reduced to at least 40 percent below the statewide greenhouse gas emissions limit no later than December 31, 2030." However, these targets do not translate directly into VMT thresholds of significance for individual projects. Therefore, the OPR Technical Advisory recommends that agencies assess a project's VMT impacts using an efficiency metric (e.g., per resident, per employee, or per service population) rather than a quantitative or absolute numeric threshold. The County estimates VMT for land use projects and plans using the following metrics.

- **Total VMT:** VMT generated by all land uses in a defined geographic area. Total VMT reflects all vehicle-trips (passenger and commercial vehicles) assigned on the roadway network. The County applies this metric to retail projects and the cumulative analysis for land use plans.

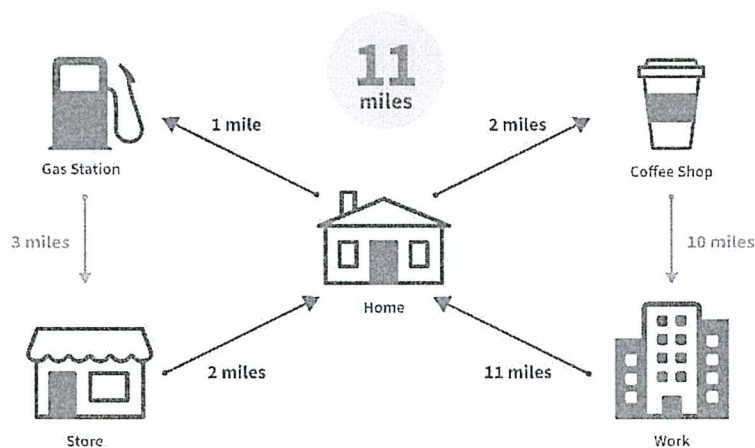
- **Total VMT per Service Population:** VMT generated by all land uses in a defined geographic area divided by the total number of residents and total number of employees in the geographic area. VMT per service population reflects all vehicle-trips (passenger and commercial vehicles) assigned on the roadway network. The County applies this metric to land use plans.
- **Home-based VMT per Resident:** VMT generated from travel between residents' homes and other destinations, such as work, school, or household errands, in a defined geographic area divided by the total number of residents in the geographic area. This metric excludes trips between two non-residential locations, such as from the store to the coffee shop. Home-based VMT per resident reflects all passenger vehicles (cars and light duty trucks) assigned on the roadway network. Figure 1, below, illustrates the home-based trips that are included in this VMT metric. The County applies this metric to residential projects.

Figure 1 - Home-Based VMT per Resident



- **Home-based work VMT per Employee:** VMT generated from travel between employees' homes and work in a defined geographic area divided by the number of employees in the geographic area. Home-based work VMT per employee reflects all passenger vehicles (cars and light duty trucks) assigned on the roadway network. Figure 2, below, illustrates the home-based work trips that are included in this metric. The County applies this metric to employment projects.

Figure 2 – Home-Based Work VMT per Employee



Transportation Projects

The SBCAG RTDM uses a boundary VMT methodology to estimate the VMT of transportation projects. The boundary methodology considers all travel on roadways in a defined geographic area, including vehicles that are traveling on the roadways but do not have an origin or destination in the defined geographic area. The SBCAG RTDM can track all vehicles traveling on the roadway network, the number of trips on each roadway segment, and the length of each roadway segment, and then estimate the VMT in the defined geographic area.

Transportation projects may change travel patterns and increase vehicle travel on the roadway network. This change is commonly known as “induced travel demand.” Induced travel demand is the overall increase in VMT that is attributable to a project, but is distinct from any background changes in VMT caused by population change, economic growth, or other factors.

The OPR Technical Advisory recommends estimating induced travel demand by estimating the net change in total VMT within a defined study area. This means the analysis should assess total roadway VMT in the study area with (i.e., potential) and without (i.e., baseline) the project; the difference between the two is the amount of VMT attributable to the project, or net change in total VMT.

The County estimates VMT for transportation projects using total roadway VMT, or the VMT generated by the number of vehicles on each roadway segment and the length of each roadway segment in the defined geographic area. Total Roadway VMT reflects all vehicles (passenger and commercial vehicles) assigned on the roadway network.

Depending on the size and location of the roadway widening or other transportation project, the SBCAG RTDM may not fully capture the increase in VMT due to induced travel demand (e.g., change in travel patterns). In these cases, the analysis should compare the percent increase in lane miles (e.g., percent change in total lane miles that will result from the project) in the study area to the existing total roadway VMT to determine if additional induced travel demand would occur.

Project Types by Land Use Category

Table 1, below, provides a list of project types and the corresponding land use category they should be considered under for Step 1, Screening Criteria, and Step 2, Thresholds of Significance for Impact Analysis, below. The project types are examples, and do not represent an exhaustive list of every allowable land use in Santa Barbara County.

Table 1: Land Use Categories for Project Types

<p>Residential</p> <p>Residential projects generally fall within the types of allowable uses contained in the Residential zone designations in the Santa Barbara County Land Use and Development Code (LUDC), Montecito Land Use and Development Code (MLUDC), and Coastal Zoning Ordinance (CZO).</p> <ul style="list-style-type: none"> • Dwelling, one-family • Dwelling, two-family • Dwelling, multiple • Farmworker housing • Student housing • Emergency shelter • Special care facility • Transitional and supportive housing • Mobile homes • Monastery 	
<p>Employment</p> <p>Employment projects generally fall within the types of allowable uses contained in the Agricultural, Commercial, Industrial, and Special Purpose zone designations in the LUDC, MLUDC, and CZO.</p> <ul style="list-style-type: none"> • Office • Medical services • Lodging (hotel, resort) • Mining and energy facilities • Manufacturing • Recycling facilities • Wholesaling and distribution • Agricultural uses • Cannabis - cultivation 	
<p>Retail</p> <p>Retail projects generally fall within the types of allowable uses contained in the Commercial and Special Purpose zone designation in the LUDC, MLUDC, and CZO. Regional retail projects are larger than 50,000 square feet.</p> <ul style="list-style-type: none"> • General retail • Grocery/food store • Cannabis – retail • Convenience store • Bar, tavern • Vehicle sales and services • Drive-through facility • Farm supply and feed store • Fuel dealer • Restaurant • Service station • Shopping center • Bank, financial facilities • Truck stop • Visitor-serving commercial • Repair services • Fitness centers • Plant nursery • Winery 	

2. Analyzing and Mitigating VMT

CEQA Guidelines Section 15064.3 and threshold “b” establish VMT as the most appropriate measure of transportation impacts under CEQA. The following subsections outline a three-step process for determining the significance of VMT impacts and, if necessary, mitigating significant VMT impacts.

Step 1: Project Screening

Many agencies use “screening criteria” to identify projects that would result in less than significant VMT impacts without conducting detailed VMT analyses and studies. The OPR Technical Advisory contains screening criteria for land use and transportation projects. The County uses these screening criteria. The OPR Technical Advisory does not include screening criteria for land use plans. Therefore, the analysis of land use plans must begin with Step 2, below.

The County presumes that land use or transportation projects meeting any of the screening criteria, absent substantial evidence to the contrary, would have less than significant VMT impacts and would not require further analysis. A single-component project (e.g., residence, office, or store) only needs to meet one of the screening criteria. However, each component of a multiple-component project (e.g., residential/retail mixed-use development) must meet at least one applicable screening criterion that relates to each specific land use.

Projects that do not meet any of the screening criteria require an analysis of VMT and a VMT transportation study. Such projects must proceed to Step 2, below.

Land Use Projects Screening Criteria

Table 2, below, lists the screening criteria for land use projects. The table contains a separate row and columns that list each project type and the applicable screening criterion.

Transportation Projects Screening Criteria

According to the OPR Technical Advisory, the County considers transportation projects that would (1) reduce VMT, or (2) not likely lead to a substantial or measurable increase in vehicle travel, to have less than significant VMT impacts. OPR took two steps to help identify such transportation projects. First, the following transportation projects would likely lead to a measurable and substantial increase in vehicle travel and, therefore, would require further analysis under Step 2, below:

Addition of through lanes on existing or new highways, including general purpose lanes, HOV [high occupancy vehicle] lanes, peak period lanes, auxiliary lanes, or lanes through grade-separated interchanges.

Second, the OPR Technical Advisory includes a sample list of transportation projects that would not likely lead to a substantial or measurable increase in VMT. Table 3, below, includes this same list, which the County uses to screen out transportation projects from further environmental review.

Table 2: Screening Criteria for Land Use Projects

Screening Categories	Project Requirements to Meet Screening Criteria
Small Projects	A project that generates 110 or fewer average daily trips. ²
Locally Serving Retail	A project that has locally serving retail uses that are 50,000 square feet or less, such as specialty retail, shopping center, grocery/food store, bank/financial facilities, fitness center, restaurant, or café. If a project also contains a non-locally serving retail use(s), that use(s) must meet other applicable screening criteria.
Projects Located in a VMT Efficient Area	A residential or employment project that is located in an area that is already 15 percent below the county VMT (i.e., “VMT efficient area”). The County’s Project-Level VMT Calculator determines whether a proposed residential or employment project is located within a VMT efficient area.
Projects near Major Transit Stop	<p>A project that is located within a ½ mile of a major transit stop or within a ½ mile of a bus stop on a high-quality transit corridor (HQTC). A major transit stop is a rail station or a bus stop with two or more intersecting bus routes with service frequency of 15 minutes or less during peak commute periods. A HQTC is a corridor with fixed route bus service with frequency of 15 minutes or less during peak commute periods. However, these screening criteria do not apply if project-specific or location-specific information indicates the project will still generate significant levels of VMT. Therefore, in addition to the screening criteria listed above, the project should also have the following characteristics:</p> <ul style="list-style-type: none"> - Floor area ratio (FAR) of 0.75 or greater; - Consistent with the applicable SBCAG Sustainable Communities Strategy (as determined by the County); - Does not provide more parking than required by the County’s Comprehensive Plan and zoning ordinances; and

² The County calculates a project’s daily trips using the latest version of the *Trip Generation Manual* (Institute of Transportation Engineers) or locally valid trip rates approved by the County Public Works Department.

	- Does not replace affordable housing units (units set aside for very low income ³ and low income households ⁴) with a smaller number of moderate or high-income housing units.
Affordable Housing	A residential project that provides 100 percent affordable housing units (units set aside for very low income and low income households); if part of a larger development, only those units that meet the definition of affordable housing satisfy the screening criteria.

Table 3: Example Transportation Projects Screened from VMT Analysis⁵

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add 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

³ As referenced in California Government Code Section 65584(f)(2) and defined in California Health and Safety Code Section 50079.5(a), “‘Very low income households’ means persons and families whose incomes do not exceed the qualifying limits for very low income families as established and amended from time to time pursuant to Section 8 of the United States Housing Act of 1937. ... In the event the federal standards are discontinued, the department shall, by regulation, establish income limits for very low income households for all geographic areas of the state at 50 percent of area median income, adjusted for family size and revised annually.”

⁴ As referenced in California Government Code Section 65584(f)(2) and defined in California Health and Safety Code Section 50079.5(a), “‘Lower income households’ means persons and families whose income does not exceed the qualifying limits for lower income families as established and amended from time to time pursuant to Section 8 of the United States Housing Act of 1937. ... In the event the federal standards are discontinued, the department shall, by regulation, establish income limits for lower income households for all geographic areas of the state at 80 percent of area median income, adjusted for family size and revised annually.”

⁵ This list is provided in the OPR Technical Advisory (OPR, December 2018, pages 20 and 21) for projects that “would not likely lead to a substantial measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis.”

- 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 non-motorized 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: Thresholds of Significance for Impact Analysis

The County generally uses thresholds of significance to determine the significance of transportation impacts for projects and plans that do not meet any of the screening criteria in

Table 2 or Table 3. The subsections below present separate VMT thresholds for land use projects, land use plans, and transportation projects.

The County expresses thresholds of significance in relation to existing, or baseline, county VMT. Specifically, the County compares the existing, or baseline, county VMT (i.e., pre-construction) to a project’s VMT. Projects with VMT below the applicable threshold would normally result in a less than significant VMT impact and, therefore, would not require further analyses or studies. Nonetheless, CEQA Guidelines Section 15064(b)(2) states, “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.” Projects with a VMT above the applicable threshold would normally result in a significant VMT impact and, therefore, would require further analyses and studies, and, if necessary, project modifications or mitigation measures as discussed in Step 3, below.

The VMT thresholds of significance are for general use and should apply to most projects subject to environmental review. However, the thresholds may not be appropriate for unique projects. In such cases, CEQA Guidelines Section 15064.7(c) allows the County to use other thresholds “... on a case-by-case basis as provided in Section 15064(b)(2).” When using thresholds on a case-by-case basis, the County will need substantial evidence to justify why different thresholds are appropriate. It will also need to explain how non-compliance or compliance with these thresholds means that a project would result in significant or less than significant VMT impacts, respectively.

Land Use Projects

The OPR Technical Advisory recommended thresholds of significance for land use projects. The County adopted these same thresholds. Table 4 contains the thresholds for land use projects.

Table 4: Land Use Projects – Thresholds of Significance

Project Type	Threshold for Determination of Significant VMT Impacts
Residential	Project VMT exceeds a level of 15 percent below existing county VMT for home-based VMT per resident.
Employment	Project VMT exceeds a level of 15 percent below existing county VMT for home-based work VMT per employee.
Regional Retail	Project VMT results in a net increase in total VMT.
Mixed-Use Projects	Evaluate each project component independently using the applicable threshold of significance above for each component (e.g., for a mixed-use project with residential and office uses, apply the residential and employment thresholds of significance for each component separately).
Other Land Use types	For project types not listed above (e.g., school, sports or entertainment facility, park), the County will apply an absolute VMT threshold (e.g., total VMT or total roadway VMT) or efficiency-based VMT threshold (e.g., home-based

	VMT per resident, home-based work VMT per employee, or total VMT per service population). The applicable threshold will depend on the project’s characteristics, including whether the project is locally or regionally serving. For projects that generally produce job-related travel (i.e., employment), the analysis can compare the project’s VMT (i.e., home-based work VMT per employee) to existing county VMT. For projects that serve the region, the analysis can compare the project’s total VMT to existing VMT, or compare the project’s net increase in total VMT to the study area VMT.
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Land Use Plans

Updating the County Comprehensive Plan, community plans, or other land use plans provides an opportunity to reduce VMT through defining land uses and providing a circulation network that minimizes longer distance trips and promotes travel through active modes of transportation. The OPR Technical Advisory recommends a threshold of significance for land use plans. The County also uses this threshold. Table 5 includes the threshold for land use plans.

Table 5: Land Use Plans – Threshold of Significance

Plans	Threshold for Determination of Significant VMT Impacts
Comprehensive Plan, Community Plan, Specific Plan	The plan’s generated total VMT per service population exceeds a level of 15 percent below existing total VMT per service population for the geographic area.

Transportation Projects

The OPR Technical Advisory recommends using the net change in total VMT to analyze a transportation project’s VMT impacts. As described under “VMT Metrics,” above, this means the County would use the SGCAG RTDM to estimate total VMT in the study area with and without the proposed transportation project and account for induced travel demand. The results would show whether the project would increase, decrease, or have no effect on total VMT in the study area.

The study area should encompass the full area in which the project would change driving patterns. The study area for large projects affecting regional travel may include the entire county, while the study area for small projects may only encompass the local community.

The OPR Technical Advisory recommends a metric for estimating a transportation project’s VMT impacts. However, it does not recommend a specific threshold of significance for transportation projects. Therefore, the County developed a threshold to determine whether a project conflicts or is inconsistent with CEQA Guidelines Section 15064.3(b) that considers the project’s potential to increase VMT. Table 6, below, includes the threshold of significance for transportation projects.

Table 6: Transportation Projects Threshold of Significance

Transportation Project	Threshold for Determination of Significant VMT Impacts
Transportation Projects	Project results in a net increase in total roadway VMT in comparison to existing VMT for the study area.

Cumulative Impacts

CEQA requires lead agencies to consider a project’s individual and cumulative impacts. Specifically, CEQA Guidelines Section 15064(h)(1) states, “the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.”⁶ The County typically uses one of two methods to determine whether a project’s VMT impact is cumulatively considerable. As explained below, one method is for projects subject to an efficiency-based threshold of significance. The other method is for projects subject to an absolute threshold of significance and land use plans.

Projects subject to Efficiency-Based Thresholds. The County generally uses efficiency-based thresholds of significance (i.e., per resident, per employee, and per service population) to analyze most land use project’s VMT impacts. Consistent with the OPR Technical Advisory (page 6), a land use project that falls below the applicable efficiency-based threshold of significance set forth in Table 4, above, would not have a VMT impact that is cumulatively considerable. Projects that are under the County’s efficiency-based impact thresholds are already shown to align with long-term environmental goals to reduce VMT. As a result, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. The Project-Level VMT Calculator provides the information necessary for this analysis.

Projects subject to Absolute Thresholds and Land Use Plans. Transportation projects and some land use projects are subject to an absolute threshold of significance (i.e., total roadway VMT or total VMT). The analysis of cumulative impacts for a project subject to an absolute threshold of significance should consider the combined impacts of the project and other closely related past, present, and reasonably foreseeable future projects. The project’s or plan’s contribution to a VMT impact would be cumulatively considerable if the study area’s total roadway VMT or total VMT, as appropriate, would be higher in the future with the project or plan in place. Land use plans should undergo similar analysis even though their project-level impacts are subject to an efficiency-based threshold of significance (i.e., VMT per service population). A land use plan could change travel patterns in the region. However, an efficiency-based threshold may not fully capture such changes. Therefore, the analysis of a land use plan’s cumulative impacts should consider the net increase in total VMT, which would provide a more detailed analysis of all travel in the plan area and region.

A transportation planner/engineer would use the SBCAG RTDM or an equivalent transportation model to generate the data necessary for this analysis. Specifically, the transportation planner/engineer would modify the future year SBCAG RTDM to reflect the

⁶ CEQA Guidelines Section 15064(h)(1) states (in pertinent part): “‘Cumulatively considerable’ means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

project or plan and the study area's total roadway VMT or total VMT, as appropriate, would be compared to future conditions without the project or plan in place. The transportation planner/engineer can also complete a redistribution of land use so that the future SBCAG RTDM contains the same land use control totals with the project or plan.

Step 3: Potential Mitigation Measures

Projects and plans that exceed the thresholds of significance in Step 2 require project modifications or mitigation measures to avoid or reduce VMT impacts to a less-than-significant level (i.e., below the applicable threshold of significance). As discussed above, the VMT Calculator contains and, therefore, can help applicants assess the effectiveness of possible mitigation measures.

Mitigation measures may not always reduce a project's VMT impacts to a less-than-significant level. In such cases, CEQA Guidelines Section 15093 requires decision makers to make a statement of overriding considerations in order to approve the project or plan.

VMT related mitigation measures focus on reducing the number of single-occupant vehicle trips generated by the project or reducing the distance of those trips. The following strategies can help reduce VMT:

- Modify the project's site design or land use characteristics to reduce VMT generated by the project. This can include increasing/decreasing density, introducing a mix of uses, clustering development, or making site design improvements such as sidewalks, bikeways, transit stop enhancements, and/or priority carpool parking.
- Implement TDM to reduce VMT generated by the project. TDM strategies are vehicle trip reductions made through project site modifications, programming, and operational changes. This can include on-going programs such as transit coordinators, transit pass subsidies, and/or shuttle programs.
- Apply any future programmatic mitigation mechanisms, where applicable, such as VMT mitigation banks, exchanges, and/or fee programs.

Applicants should tailor mitigation measures to a project's characteristics and potential impacts. They also must present substantial evidence to support any conclusions regarding whether the mitigation measures would reduce the impacts to less than significant or whether the impacts would remain significant and unavoidable. If the project will rely on programmatic mitigation measures, the applicant must show with substantial evidence how participation in the program will mitigate project-generated VMT.

F. Threshold "c" – Design Features and Hazards

Threshold "c" considers whether a project would increase roadway hazards. An increase could result from existing or proposed uses or geometric design features. In part, the analysis should review these and other relevant factors and identify results that conflict with the County's Engineering Design Standards or other applicable roadway standards. For example, the analysis may consider the following criteria:

- Project requires a driveway that would not meet site distance requirements, including vehicle queuing and visibility of pedestrians and bicyclists.
- Project adds a new traffic signal or results in a major revision to an existing intersection that would not meet the County's Engineering Design Standards.

- Project adds substantial traffic to a roadway with poor design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure).
- Project introduces a new use and substantial traffic that would create potential safety problems on an existing road network (e.g., rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use).

If a project would result in potential roadway hazards, the applicant would need to modify the project or identify mitigation measures that would eliminate or reduce the potential hazards. For example, an applicant for a retail shopping center may need to shift the location of a new driveway or add sidewalks or pedestrian crossings to reduce potential conflicts between customers and pedestrians.

G. Threshold “d” – Emergency Access

Threshold “d” considers any changes to emergency access resulting from a project. To identify potential impacts, the analysis must review any proposed roadway design changes and determine if they would potentially impede emergency access vehicles.

A project that would result in inadequate emergency vehicle access would have a significant transportation impact and, as a result, would require project modifications or mitigation measures. For example, a project that modifies a street and, as a result, impairs fire truck access, would require modifications or redesign to comply with County and fire department road development standards.

H. Thresholds for Projects with Commercial Vehicles

CEQA Guidelines Section 15064.3(a) focusses on “automobile travel.” The OPR Technical Advisory states that “automobile” refers to on-road passenger vehicles, specifically cars and light trucks. It does not include heavy-duty trucks, semi-trailers, construction equipment, or other commercial-type vehicles. The definitions in Subsection E.1, VMT Metrics, above, describe the types of vehicle-trips that are included in the various methods used to calculate VMT.

As a result, the VMT criteria and thresholds in the CEQA Guidelines and this chapter related to employment generating uses do not apply to those components of proposed projects that involve commercial vehicles. However, the VMT criteria and thresholds would apply to those components that involve passenger vehicles. For example, a proposed oil production or agricultural processing facility may involve significant numbers of commercial trucks and semi-trailers that would haul supplies and products to and from the facility. The project may also involve employees and others who would travel to and from the facility in passenger vehicles. In this case, the VMT analysis would not address potential VMT generated by the commercial trucks and semi-trailers and, therefore, would not consider such VMT a significant transportation impact. Rather, the VMT analysis would focus on VMT generated by passenger vehicles traveling to and from the facility (i.e., transportation threshold question “b”).

Such facilities are still subject to the other transportation threshold questions listed above that do not apply VMT metrics or otherwise implement CEQA Guidelines Section 15064.3. Specifically, transportation threshold questions “a,” “c,” and “d,” above, would apply to the project. Threshold questions “a,” “c,” and “d” consider a project’s effects on the circulation system, roadway hazards, and emergency access, respectively. These non-VMT metrics and threshold questions would apply to the entire project, including potential impacts from commercial and

passenger vehicles traveling to and from the facility. Applicants may need to submit a traffic study (e.g., local transportation assessment) to address threshold questions “a,” “c,” and “d.”

I. VMT Transportation Studies

The following projects require a VMT transportation study:

- Projects that do not meet the VMT screening criteria in subsection E.1., Step 1: Project Screening, above; and
- Land use plans.

The County will only accept VMT transportation studies that use the most up-to-date version of the SBCAG RTDM or an equivalent transportation model at the time the County publishes the Notice of Preparation, or if the County does not publish a Notice of Preparation, at the time the County commences environmental analysis.

The following text and bullet points outline the requirements for VMT transportation studies. Studies for projects that meet the applicable threshold of significance should be succinct (three or four pages in length) and simply document why the project meets the applicable threshold. Studies for projects that do not meet the applicable threshold of significance need to be comprehensive and, at a minimum, include the information outlined in the text and bullet points below. The text and bullet points are not exhaustive; some VMT transportation studies may require additional data and analyses.

CEQA Guidelines Section 15064.3(a) states that agencies may no longer use automobile delay to determine the significance of transportation impacts under CEQA. Therefore, VMT transportation studies generally will not analyze LOS or similar measures of vehicular capacity or traffic congestion for purposes of CEQA. However, LOS remains an important metric for transportation planning and projects must still comply with applicable LOS-based policies and standards in the Comprehensive Plan. Therefore, an applicant may need to submit a traffic study (e.g., local transportation assessment) that assesses the project’s consistency with LOS policies and the project’s effects on the road network and, if necessary, recommend access and/or roadway improvements. In such cases, the applicant may submit one comprehensive study that addresses (1) VMT and applicable thresholds of significance and (2) LOS and applicable policies and standards.

The following text and bullet points summarize the minimum requirements for a VMT transportation study. The County’s Engineering Design Standards outline the requirements for traffic studies. Applicants should consult County Public Works staff before preparing a project-specific traffic study (e.g., local transportation assessment).

Executive Summary

VMT transportation studies should begin with an executive summary that is no more than two pages. The executive summary should briefly review the project’s VMT transportation impacts and, if applicable, mitigation measures.

Maps

VMT transportation studies should include maps that show the following features:

- Project location and vicinity, including roadways that will be used by occupants and visitors to get to and from the project site, such as local roadways and access to major arterials and state highways; and

- Project site plan.

Tables

VMT transportation studies should include tables that include the following information:

- VMT analysis results; and
- VMT impact summary and mitigation measures.

Narrative, Footnotes and Appendices

VMT transportation studies should include narrative, footnotes, and appendices that include the following information:

- Sources and dates of data including persons contacted;
- Methods used and special circumstances;
- VMT calculations; and
- Mitigation measures proposed and effect on VMT or other applicable impact areas.