

**CITY OF TEMECULA
AGENDA REPORT**

TO: City Manager/City Council

FROM: Luke Watson, Director of Community Development

DATE: May 26, 2020

SUBJECT: Adopt California Environmental Quality Act (CEQA) Transportation Vehicle Miles Traveled (VMT) Analysis Guidelines

PREPARED BY: Sara Toma, Assistant Planner

RECOMMENDATION: That the City Council adopt a resolution entitled:

RESOLUTION NO. 2020-

A RESOLUTION OF THE CITY COUNCIL OF THE CITY
OF TEMECULA TO ADOPT THE CALIFORNIA
ENVIRONMENTAL QUALITY ACT (“CEQA”)
TRANSPORTATION VEHICLE MILES TRAVELED (“VMT”)
ANALYSIS GUIDELINES FOR PURPOSES OF ANALYZING
TRANSPORTATION IMPACTS UNDER CEQA, AND
MAKING A FINDING OF EXEMPTION UNDER CEQA (LONG
RANGE PLANNING PROJECT NO. LR18-1506)

BACKGROUND: The City of Temecula is updating the current Traffic Impact Analysis Guidelines to establish a new metric for the analysis of transportation impacts from new development. The new guidelines will bring the City into conformance with Senate Bill (“SB”) 743.

In September 2013, Governor Brown signed SB 743 (Steinberg). This legislation provided a shift in the focus of transportation analysis under the California Environmental Quality Act (“CEQA”) from Level of Service (“LOS”), which measures roadway capacity and automobile delay, to Vehicle Miles Traveled (“VMT”), which is an estimate of the amount and distance people drive by automobile to reach a destination. The desired outcomes from this change are a reduction in auto emissions, the creation of inter-connected transportation networks with a variety of travel modes, and the development of land uses designed to support those networks.

As part of a combined effort, staff worked closely with Western Riverside Council of Governments (“WRCOG”) to stay updated on current VMT guidelines and potential grant opportunities. In 2018, staff applied for and was awarded a Sustainable Communities Program grant through the

Southern California Association of Government (“SCAG”) under the Sustainable Communities Program Grant to assist in updating the City’s Traffic Impact Analysis (“TIA”) Guidelines to comply with SB 743. The City’s existing TIA Guidelines provide a standard format and methodology for assessing potential traffic and circulation impacts of proposed development projects, General Plan Amendments, Specific Plans, and changes in land use zoning. The TIA Guidelines use LOS based on intersection delay as the basis to analyze impacts to intersections and roadway segments within a specified area.

The City entered into an agreement with Fehr & Peers to update the City’s TIA Guidelines to replace LOS based measurements with VMT for CEQA analysis concerning transportation impacts. While LOS will not be used under CEQA, a project applicant will still be required to analyze traffic impacts under the General Plan’s Circulation Element as it relates to infrastructure requirements.

The key differences between LOS and VMT are outlined below.

Transportation “Level of Service” (LOS) Measurement

LOS measures vehicle delay (i.e., congestion at intersections and on roadways) and is represented as a letter grade A through F, where LOS A represents completely free flowing traffic, while LOS F represents highly congested conditions. To calculate LOS for a project, a multi-step process is required to identify, estimate, or obtain the following information: study intersections that may be affected, existing traffic count and current delay data, and trips projected from a project, along with travel mode (e.g., vehicle, transit, walking or bicycling) and direction of vehicle trip travel.

Vehicle Miles Traveled (VMT)

VMT measures the amount and distance people drive by vehicle. Typically, development at a greater distance from other land uses and in areas without transit generate more driving than development near other land uses with more robust transportation options. Currently, VMT is used to help measure other CEQA impacts within the City, including air quality and greenhouse gas emissions at a project level, and in General Plan or program-level analysis, to identify long-range transportation impacts.

Governor’s Office of Planning and Research (OPR) Technical Advisory

In December 2018, the Governor’s Office of Planning and Research (“OPR”) provided a Technical Advisory evaluating transportation impacts under CEQA, as a service to professional planners, land use officials, and CEQA practitioners. The purpose of the OPR Technical Advisory is to provide advice and recommendations, which agencies may use at their discretion in preparing environmental documents subject to CEQA.

OPR assisted in the determination of significance, as many lead agencies rely on “thresholds of significance.” The CEQA Guidelines define a “threshold of significance” to mean “an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance

with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.” (*CEQA Guidelines, Section 15064.7, subd. (a).*) Lead agencies have discretion to develop and adopt their own thresholds, or rely on thresholds recommended by other agencies, provided that the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

DISCUSSION

Implementing the Requirements of SB 743 Legislation

To implement the legislation, the lead agency (the City) needs to determine an appropriate VMT methodology, thresholds, and feasible mitigation measures. Because VMT is a new methodology to analyze transportation impacts, and OPR’s Technical Advisory recommended that the lead agency have discretion to develop and adopt its own thresholds, there is a need to develop appropriate guidance for projects subject to environmental review. Furthermore, to assist lead agencies in western Riverside County with SB 743 implementation, WRCOG, with support from SCAG, developed implementation guidance and a VMT impact screening tool with the WRCOG SB 743 Implementation Pathway Study. The guidance is to ensure that all projects reviewed by the City use the same data, approaches, and analytical tools.

Because SB 743 represents a significant departure from the City’s current practice of using LOS, the City must address the following questions below, prior to taking any action:

- 1. Methodology** – what methodology should be used to forecast projected-generated VMT and the project’s effect on VMT under baseline and cumulative conditions, and how does the selection of a threshold influence the methodology decision?
- 2. Thresholds** – what threshold options are available to each jurisdiction and what substantial evidence exists to support selecting a specific VMT threshold?
- 3. Mitigation** – what would constitute feasible mitigation measures for a VMT impact given the land use and transportation context of the WRCOG region?

The following is a description of the methodologies analyzed to forecast “project-generated VMT,” criteria used to establish VMT thresholds of significance, and the identification of potential mitigation measures that can be used to address CEQA.

1. Methodology

Baseline VMT Methodology and Data: Base Year (2012) total VMT per service population (i.e., population plus employment), home-based VMT per capita, and home-based work VMT per worker were calculated using outputs from SCAG’s Regional Transportation Plan travel forecasting model and the Riverside County Transportation Analysis Model (“RIVTAM”). In addition, data from the California Household Travel Survey was used to compare model derived estimates of home-based VMT with those based on survey observations. VMT results and comparisons of results from different data sources were displayed graphically to aid in determining

the appropriate VMT metric and data source for calculating VMT for use in the WRCOG sub region.

Based on the different options analyzed, it is recommended to utilize the RIVTAM and the VMT per service population data, as noted in the WRCOG analyses. Jurisdictions and technical experts have been utilizing RIVTAM since 2009; there is a familiarity with the model. Furthermore, a new version of the Riverside County Travel Demand Model (RIVTAM/RIVCOM) is being developed and will be renamed Riverside County Modal (“RIVCOM”) by WRCOG and will be ready for use by Fall 2020. The new version of the model will be updated and refined to include full external trip lengths.

Tools Assessment: The capabilities of travel forecasting models, along with eleven sketch model tools were reviewed to determine their strengths and weaknesses in generating appropriate VMT results for SB 743 analysis and testing VMT mitigation strategies. Based on the travel forecasting model review, it is recommended that the RIVTAM be utilized for VMT impact analysis.

2. Thresholds

Potential VMT thresholds were assessed within the context of the objectives of SB 743, legal opinions related to the legislation, proposed CEQA Guidelines updates, and the Technical Advisory produced by OPR. The project team, led by Fehr & Peers, identified four threshold options for consideration by lead agency (the City).

- a) Thresholds consistent with OPR’s Technical Advisory, recommending that proposed developments generate VMT per person that is 15% below existing VMT per capita;
- b) Thresholds consistent with Lead Agency air quality, greenhouse gas emissions reduction, and energy conservation goals;
- c) Thresholds consistent with the Regional Transportation Plan / Sustainable Communities Strategy future year VMT projects by jurisdiction or sub-region; and
Thresholds based on baseline VMT performance by jurisdiction or sub-region.

3. Mitigation

Transportation Demand Management (“TDM”) strategies and its effectiveness for reducing VMT were reviewed and assessed for relevancy. Given the City’s suburban land use context, the following key strategies were identified as the most appropriate.

- Diversifying land use
- Improving pedestrian networks
- Implementing traffic calming infrastructure
- Building off-street bicycle network improvements
- Encouraging telecommuting and alternative work schedules
- Providing ride-share programs

Due to limitations of project-by-project approaches to reducing VMT, an evaluation of larger mitigation programs was conducted by WRCOG. The evaluation considered existing programs such as the WRCOG Transportation Uniform Mitigation Fee (“TUMF”) Program and new mitigation program concepts. While the TUMF Program funds a variety of projects including those that would contribute to VMT reduction, the overall effect of the Program results in an increase in VMT due to substantial roadway capacity expansion. The TUMF Program could be modified to separate the VMT, reducing projects into a separate impact fee program based on a VMT reduction nexus, but it could not be relied upon for VMT mitigation in its current form. New program concepts included VMT mitigation banks and exchanges. These are innovative concepts that have not yet been developed and tested but are being considered in areas where limited mitigation options would otherwise exist. WRCOG is undertaking a study to look into the feasibility of a VMT mitigation bank or exchange in order to further assist lead agencies in implementing SB 743.

CEQA TRANSPORTATION VMT ANALYSIS GUIDELINES

Taking the above factors into consideration, staff worked with Fehr & Peers to revise the City’s Traffic Impact Analysis (TIA) Guidelines to include a VMT section (CEQA Transportation VMT Analysis Guidelines) to ensure consistency with SB 743. The draft VMT section is consistent with OPR’s Technical Advisory Guidelines and WRCOG’s SB 743 Implementation Pathway Study.

The VMT Analysis Guideline document is organized as follows:

1. Metric and Methodology for Calculating VMT
2. VMT Analysis for Land Use Projects
3. VMT Analysis for Transportation Projects
4. VMT Reduction and Mitigation Measures
5. Cumulative VMT Impacts

The following is a short description of established VMT thresholds of significance, VMT analysis for land use and transportation projects, mitigation, and cumulative VMT impacts. For full details, see Attachment 1: CEQA Transportation VMT Analysis Guidelines.

1. Metric and Methodology for Calculating VMT

Transportation VMT analysis for CEQA should be conducted using the Riverside County Transportation Analysis Model (RIVTAM). The Model outputs can be used to produce Total VMT per Service Population and Total VMT. VMT per Service Population is established by dividing the total VMT with at least one trip end in the City by the population plus employment of the City.

$$\text{VMT} = \text{Vehicle Trips} \times \text{Trip Average Length}$$

OR

$$\text{VMT} = \text{Roadway Volume} \times \text{Roadway Distance}$$

2. VMT Analysis for Land Use Projects

Screening Criteria for CEQA VMT Analysis for Land Use Projects

The requirements to prepare a detailed VMT analysis applies to all projects except for the following types of Projects, as they will not result in significant transportation impacts:

1. Small Residential and Employment projects
2. Projects Located Near a Major Transit Stop/High Quality Transit Corridor
3. Projects Located in a VMT Efficient Area
4. Locally Serving Retail Projects
5. Locally Serving Public Facilities
6. Redevelopment Projects with Greater VMT Efficiency
7. Affordable Housing

Include verbiage along the lines of – these projects being “screened out” – or something that helps the reader understand what screening criteria means

VMT Thresholds of Significance for Land Use Projects

Projects that do not meet the above screening criteria must include a detailed evaluation of the VMT produced by the project. Any project with a VMT/Service Population 15% below the WRCOG baseline average VMT/Service Population can be presumed to have a less than significant impacts.

3. VMT Analysis for Transportation Projects

For transportation projects, any project that results in an increase in additional motor vehicle capacity (such as constructing a new roadway or adding additional vehicle travel lanes on an existing roadway) has the potential to increase vehicle travel, referred to as “induced vehicle travel.” Appendix C of the VMT Analysis Guidelines contains a list of transportation projects that, absent substantial evidence to the contrary, do not require an induced travel/VMT analysis because they typically do not cause substantial or measurable increases in VMT.

4. VMT Reduction and Mitigation Measures

Consistent with general CEQA principles, if a project is found to have a significant impact on VMT, the impact must be reduced by modifying the project so that the VMT is reduced to an acceptable level (below the established thresholds of significance) and/or by imposing all feasible mitigation measures to mitigate the VMT impact to a less than significant level. If, after imposing all feasible mitigation measures, the project VMT levels are still above the established thresholds of significance, the City will consider adoption of a statement of overriding considerations in compliance with CEQA Guidelines Sections 15091 and 15093, as already occurs when impacts in any area remain significant after adoption of all feasible mitigation.

5. Cumulative VMT Impacts

Because VMT is a composite metric that will continue to be generated over time, a key consideration for cumulative scenarios is whether the rate of VMT generation gets better or worse in the long term. If the rate is trending down over time consistent with expectations for air pollutant and GHGs, then the project level analysis may suffice. However, the trend direction must be supported with substantial evidence. A project would result in a significant project-generated VMT impact under cumulative conditions if the cumulative project-generated VMT per service population exceeds the WRCOG baseline VMT per service population.

Measuring the “project’s effect on VMT” is necessary especially under cumulative conditions to fully explain the project’s impact. A project effect on VMT under cumulative conditions would be considered significant if the cumulative total VMT per service population increases under the plus project condition compared to the no project condition.

PUBLIC MEETINGS

Planning Commission

On April 22, 2020, the Planning Commission by a vote of 5-0 recommended City Council approval of the draft CEQA Transportation VMT Analysis Guidelines for implementation of the California Environmental Quality Act for the City of Temecula.

Public Traffic Safety Commission

On April 23, 2020, the Public Traffic Safety Commission received and filed the proposed draft CEQA Transportation VMT Analysis Guidelines for implementation of the California Environmental Quality Act for the City of Temecula.

LEGAL NOTICING REQUIREMENTS

Notice of the public hearing published in the *SD Union Tribune* on May 14, 2020.

ENVIRONMENTAL DETERMINATION: In accordance with the California Environmental Quality Act (CEQA), it has been determined that the adoption of the CEQA Traffic Analysis Update VMT Thresholds and Guidelines, which is an action consistent with Senate Bill (“SB”) 743, will not result in a direct or reasonably foreseeable indirect physical change in the environment, and thus the Thresholds and Guidelines are not subject to CEQA (14 CCR § 15378(a)). In addition, the Thresholds and Guidelines are not a “project” within the meaning of CEQA pursuant to 14 CCR § 15378(b)(5) and constitute an action involving procedures for the protection of the environment, which is exempt from CEQA pursuant to 14 CCR § 15308. Finally, if the Thresholds and Guidelines are determined to be subject to CEQA, they are exempt therefrom because it can be seen with certainty that there is no possibility that these amendments will have a significant effect on the environment. (14 CCR § 15061(b)(3).)

FISCAL IMPACT: There is no fiscal impact associated with this action.

ATTACHMENTS:

1. CEQA Transportation VMT Analysis Guidelines
2. Resolution No. 2020-
3. Notice of Public Hearing
4. April 22, 2020 Planning Commission Staff Report
5. Planning Commission Resolution No. 2020-10