STAFF REPORT – PLANNING
CITY OF TEMECULA
PLANNING COMMISSION

TO:	Planning Commission Chairperson and Members of the Planning Commission
FROM:	Luke Watson, Director of Community Development
DATE OF MEETING:	April 22, 2020
PREPARED BY:	Sara Toma, Assistant Planner
PROJECT NAME:	SB 743 Vehicle Miles of Travel (VMT): CEQA Traffic Impact Analysis Guidelines Update to include VMT Thresholds and Guidelines
PROJECT SUMMARY:	Long Range Project Number LR18-1506. To conform with State Law Senate Bill ("SB") 743 by replacing vehicular Level of Service (LOS) with Vehicle Miles Traveled (VMT) transportation analysis metric under the California Environmental Quality Act (CEQA).
CEQA:	Not subject to CEQA - CEQA Guidelines § 15378(a); Categorically exempt from CEQA - CEQA Guidelines §§ 15378(b) (5), 15308 and 15061(b) (3).
RECOMMENDATION:	Staff recommends that the Planning Commission adopt a Resolution recommending that the City Council adopt Vehicle Miles Traveled (VMT) thresholds of significance for purposes of analyzing transportation impacts under the California Environmental Quality Act.

BACKGROUND

In September 2013, Governor Brown signed Senate Bill ("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. In 2019, the City was selected and awarded by SCAG to assist in updating the City's Traffic Impact Analysis ("TIA") Guidelines to facilitate compliance with SB 743. The

City's current 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 City's 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.

Vehicles 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)

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 document is to provide advice and recommendations, which agencies 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. Since 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.

Since 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 called 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
d) 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 and 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.

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 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

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 lands 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 since 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 section 15091 and 15093, as already occurs when impacts in any area remain significant after adoption of all feasible mitigation.

5. Cumulative VMT Impacts

Since 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/service population increases under the plus project condition compared to the no project condition.

LEGAL NOTICING REQUIREMENTS

Notice of the public hearing published in the *SD Union Tribune* on April 9, 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).)

ATTACHMENTS:

1. CEQA Transportation VMT Analysis Guidelines
2. Planning Commission Resolution
3. Exhibit A – City Council Resolution
4. Notice of Public Hearing

CEQA Transportation VMT Analysis Guidelines

City of Temecula

April 3, 2020

FEHR PEERS

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Appendices

Overview

SB 743, signed by the Governor in 2013, changes the focus of transportation impact analysis in CEQA from measuring impacts to drivers, to measuring the impact of driving. The change is being made by replacing LOS with VMT and providing streamlined review of land use and transportation projects that will help reduce future VMT growth. This shift in transportation impact focus is expected to better align transportation impact analysis and mitigation outcomes with the State's goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation.

In January 2019, the Natural Resources Agency finalized updates to the CEQA Guidelines including the incorporation of SB 743 modifications. The Office of Planning and Research (OPR) published its latest Technical Advisory on Evaluating Transportation Impacts in CEQA to the California Natural Resources Agency in December 2018. This Technical Advisory provides recommendations on how to evaluate transportation impacts under SB 743. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant CEQA transportation impacts. The OPR guidance recommends the use of Vehicle Miles Travelled, or VMT, as the preferred CEQA transportation metric. To comply with the new legislation the City of Temecula has established a VMT analysis methodology, established VMT thresholds for CEQA transportation impacts, and identified of possible mitigation strategies. SB 743 includes the following two legislative intent statements:

1. Ensure that the environmental impacts of traffic, such as noise, air pollution, and safety concerns, continue to be properly addressed and mitigated through the California Environmental Quality Act.
2. More appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions.

Since CEQA transportation analysis now requires an evaluation of a project's potential impacts related to VMT significance criteria, the VMT analysis will:

- Enable proposed development projects to comply with current CEQA requirements as a result of the implementation of SB 743.
- Outline the County's CEQA significance thresholds, screening criteria, and methodology for conducting the transportation VMT analysis.
- Help determine if mitigation is required to offset a project's significant VMT impacts.
- Identify VMT reduction measures and strategies to mitigate potential impacts below a level of CEQA significance.
- Reduce the need to widen or build roads through effective use of the existing transportation network and maximizing the use of alternative modes of travel throughout the County.

VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. VMT does not directly measure traffic operations but instead is a measure of network use or efficiency, especially if expressed as a function of population or employment (i.e. VMT per resident). VMT tends to increase as land use density decreases and travel becomes more reliant on the use of the automobile due to the long distances between origins and destinations. VMT can also serve as a proxy for impacts related to energy use, air pollution emissions, GHG emissions, safety, and roadway maintenance. The relationship between VMT and energy or emissions is based on fuel consumption. The traditional use of VMT in environmental impact analysis is to estimate mobile air pollution emissions, GHGs, and energy consumption.

This guidelines document is organized as follows:

1. Metrics 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

Metrics and Methodology for Calculating VMT

Transportation VMT analysis for CEQA should be conducted using the Riverside County Transportation Analysis Model (RIVTAM) [1]. The model outputs can be used to produce Total VMT/Service Population and Total VMT.

VMT per Service Population

VMT/Service Population is established by dividing the total VMT with at least one trip end in the City of Temecula by the population plus employment of the City. The total VMT includes all internal VMT, internal to external, and external to internal VMT (in other words all VMT regardless of geographic boundaries). Since this metric combines VMT for residents and employees and reflects how accessible all land uses are (for example, geographies with higher density, more shopping, and more jobs will have lower VMT/Service Population) it can be used to evaluate multiple types of projects. To analyze the VMT/Service Population for a proposed project, the project's total VMT is divided by the project population plus employment.

The total VMT (origin-destination method) within the City can be calculated directly from model outputs by multiplying the origin-destination (O-D) trip matrix by the final assignment skims (O-D Method VMT). The total VMT value should be appended to include VMT from all trips that enter or exit the San Diego County, as explained in the Trip Length Adjustment section.

Total VMT (Boundary Method)

Total daily VMT within a given area can be measured by multiplying the daily volume on every roadway segment by the length of every roadway segment within a given area. This is called Boundary Method VMT. Examples of total VMT (Boundary Method) are VMT within the WRCOG region, VMT within the City of Temecula, or VMT within the vicinity of a transportation project.

Trip Length Adjustments

Trip length adjustments for trips leaving the RIVTAM Model Area can be made by using the California Statewide Travel Demand Model (CSTDM).

[1] RIVCOM is currently under development with an anticipated completion date in the Spring/Summer of 2020. Once finalized, RIVCOM should be utilized for all forecasting activity.

Adjusting the length of trips leaving a model boundary requires appending extra distance at the model gateway zone (or external centroid) connectors. This process results in new gateway distances that are weighted based on the amount and location of external travel origins and destinations.

The first step of this process is to determine trip volume leaving or entering the model boundary. These are referred to as internal-to-external (IX) and external-to-internal (XI) trips. This data can be generated either from O-D trip matrices or by conducting a select zone analysis to track trips to the model gateways. The volume at the gateways for this purpose should not include external-to-external (XX) through trips.

Determining the full length of trips leaving or entering a model boundary requires an OD dataset that includes flows between the model area and the area external to the model. The California Statewide Travel Demand Model (CSTDM) should be used to develop the OD dataset.

The next step requires determining the gateway(s) based on the RIVTAM model which trips from the OD data source would travel through. The trip length adjustment process ultimately requires calculating the weighted average distance beyond each model gateway. The process of calculating trip lengths external to the RIVTAM model region for trips entering or exiting the RIVTAM model area using the CSTDM is described below:

- Create correspondence between Study Area TAZs within RIVTAM model to the Statewide Model TAZs.
- Add "Gate" attribute to CSTDM roadway network links and set "Gate" equal to gateway id only for those links identified as the locations corresponding to the RIVTAM model gateways.
- Add "Gate_Dist" attribute to CSTDM roadway network links and set "Gate_Dist" equal to the link distance for those links outside the RIVTAM model boundary. All the CSTDM roadway links inside the RIVTAM model boundary will have a "Gate_Dist" attribute of 0.
- Run a highway skim on the CSTDM roadway network to skim the shortest travel time between each OD pair, tracking the gateway and distance outside the RIVTAM model boundary.
- For each gateway, summarize the average distance beyond the RIVTAM model boundary weighted by volume at each gateway.
- Tag the gateway distance from the above step using CSTDM to the gateways in the RIVTAM model and multiply to the gateway volume from the RIVTAM model to determine the gateway external VMT to the RIVTAM model. Make sure not to double-count any overlap distance that's already accounted for in the VMT calculation from the RIVTAM model.

Table 1 shows the base year (2012) weighted average distance beyond the RIVTAM model boundary for trips passing through the San Diego County model gateway, as calculated using the methodology above. A full list of distances for model gateway distances for the RIVTAM model can be found in Appendix A.

Table 1: Average Trip Distances South of San Diego County Line

Gateway		Distance Outside San Diego County (miles)	
Route	County	IX Trips	XI Trips
SR-79	San Diego	40.9	41.7
Pala Rd	San Diego	19.3	20.4
I-15	San Diego	23.8	23.1
Sandia Creek Rd	San Diego	6.7	6.7
De Luz Rd	San Diego	4.4	4.4
Tenaja Rd	San Diego	6.5	6.5

Source: Fehr & Peers.

VMT Analysis for Land Use Projects

Screening Criteria for CEQA VMT Analysis for Land Use Projects

The requirements to prepare a detailed transportation VMT analysis apply to all land development projects, except those that meet at least one of the screening criteria. A project that meets at least one of the screening criteria below would have a less than significant VMT impact due to project characteristics and/or location.

1. Small Residential and Employment Projects

Projects generating less than 110 daily vehicle trips (trips are based on the number of vehicle trips after any alternative modes/location-based adjustments are applied) may be presumed to have a less than significant impact absent substantial evidence to the contrary.

2. Projects Located Near a Major Transit Stop/High Quality Transit Corridor

Projects located within a half mile of an existing major transit stop or an existing stop along a high-quality transit corridor[2] may be presumed to have a less than significant impact absent substantial evidence to the contrary. This presumption may not be appropriate if the project:

- Has a Floor Area Ratio of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the City
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units

3. Projects Located in a VMT Efficient Area

A VMT efficient area is any area with an average VMT per service population 15% below the baseline average for the WRCOG region. Land use projects may qualify for the use of VMT efficient area screening if the project can be reasonably expected to generate VMT per service population that is similar to the existing land uses in the VMT efficient area. Projects located within a VMT efficient area may be presumed to have a less than significant impact absent substantial evidence to the contrary. Screening maps for each metric and subregion can be found in Appendix B.

[2] Major transit stop: a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. High quality transit corridor: a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute periods.

4. Locally Serving Retail Projects

Local serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel.

5. Locally Serving Public Facilities

Public facilities that serve the surrounding community or public facilities that are passive use may be presumed to have a less than significant impact absent substantial evidence to the contrary.

6. Redevelopment Projects with Greater VMT Efficiency

A redevelopment project may be presumed to have a less than significant impact if the proposed project's total project VMT is less than the existing land use's total VMT.

7. Affordable Housing

An affordable housing project may be presumed to have a less than significant impact absent substantial evidence to the contrary.

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 impact.

VMT Analysis Procedures for Land Use Projects

For projects which meet one of the screening criteria for CEQA VMT analysis, no additional analysis is necessary. For projects which are not screened, an evaluation of the VMT produced by the project is necessary. To complete the analysis, the project should be evaluated using the RIVTAM Model (or RIVCOM model once available) to evaluate the VMT/Service population using the methodology described in the Methodology section.

If the project includes transportation demand management (TDM) measures, the reduction in VMT due to each measure shall be calculated and can be applied to the project analysis. There are several resources for determining the reduction in VMT due to TDM measures, such as the California Air Pollution Control Officers Association (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures (2010) (Quantification Report).

The VMT reductions associated with project TDM should be applied to the project VMT estimate (nsuring that the VMT reduction is applied to the appropriate project VMT. For example, if a commute trip reduction program is proposed for a multi-family residential project, the VMT reduction should only be applied to the work related VMT associated with the project. If the project does not include any TDM, then no reduction would be taken.

The resulting VMT values should be compared to the significance threshold determine whether the project results in a significant CEQA transportation impact due to VMT.

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."

Screening Criteria for CEQA VMT Analysis for Transportation Projects

Appendix C contains a list of transportation projects that, absent substantial evidence to the contrary, do not require an induced travel/VMT analysis since they typically do not cause substantial or measurable increases in VMT.

VMT Thresholds of Significance for Transportation Projects

A net increase in area total VMT indicates that the project has a significant impact

VMT Analysis Procedures for Transportation Projects

To calculate the change in area (boundary method) total VMT, the transportation project should be input into the travel demand model. The "with project" area total VMT produced by the model run is compared to the "no project" area total VMT. A net increase in area VMT indicates that the project has a significant impact

VMT Reduction and Mitigation Measures

To mitigate VMT impacts, the project applicant must reduce VMT, which can be done by either reducing the number of automobile trips generated by the project or by reducing the distance that people drive. The following strategies are available to achieve this:

1. Modify the project's built environment characteristics to reduce VMT generated by the project.
2. Implement TDM measures to reduce VMT generated by the project.

Strategies that reduce single occupant automobile trips or reduce travel distances are called TDM strategies. There are several resources for determining the reduction in VMT due to TDM measures such as the CAPCOA Quantification Report.

Cumulative VMT Impacts

Since 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/service population increases under the plus project condition compared to the no project condition.

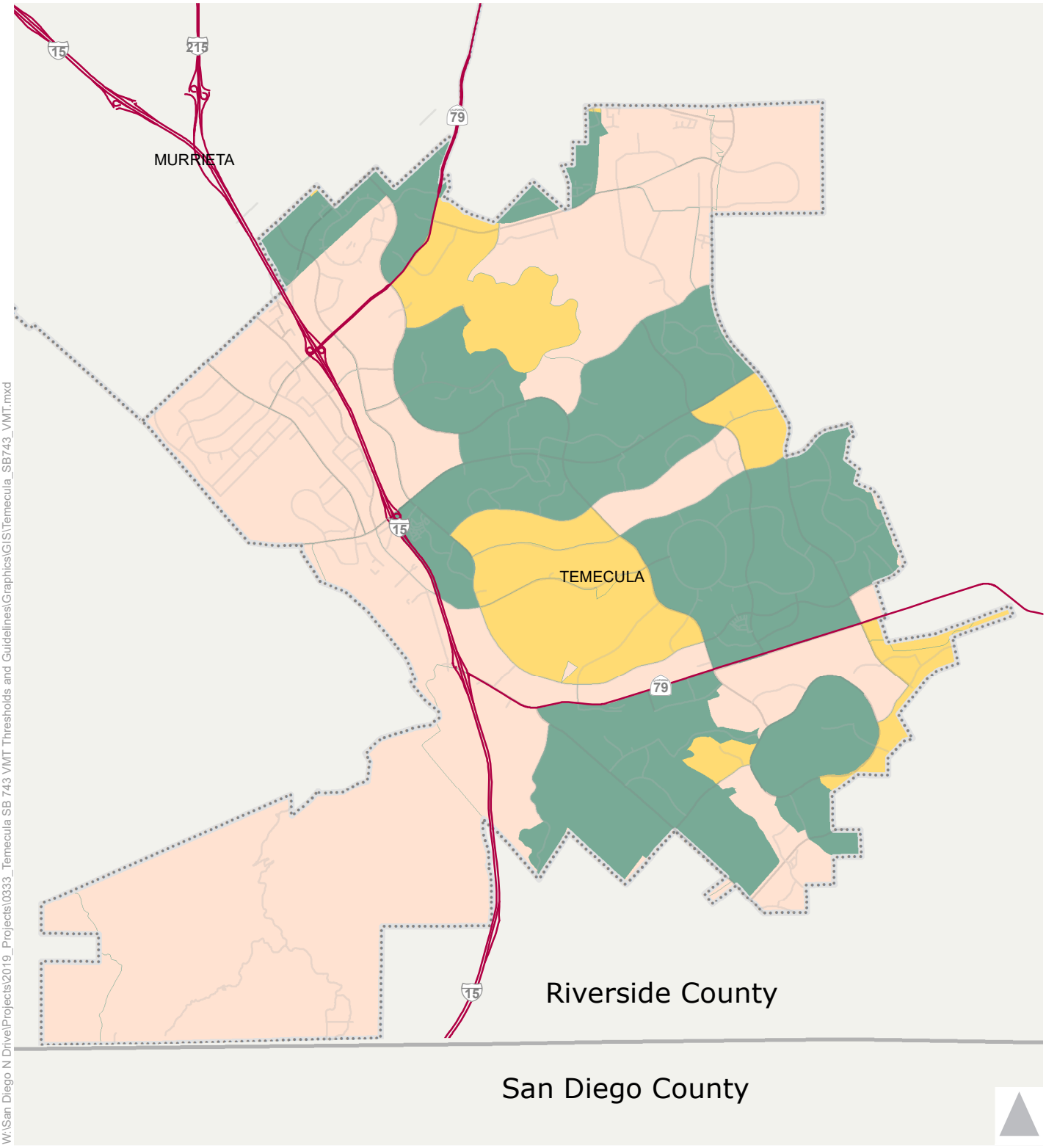
Please note that the cumulative no project shall reflect the adopted RTP/SCS; as such, if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant.

Appendix A: Model Gateway Distances

Gateway		Distance Outside San Diego County (miles)	
Route	County	IX Trips	XI Trips
US-101	Santa Barbara	24.4	26.4
SR-150	Santa Barbara	1.9	1.4
SR-33	Santa Barbara	162.9	184.7
Lockwood Valley Rd	Kern County	1.8	1.9
I-5	Kern County	224.2	224.8
90th Street W	Kern County	26.9	19.8
60th Street W	Kern County	0.0	6.1
SR-14	Kern County	30.3	29.0
Sierra Hwy	Kern County	0.0	0.0
120th Street E	Kern County	13.0	13.1
Mercury Blvd. (200th St)	Kern County	0.0	0.0
SR-58	Kern County	102.8	92.7
SR-395	Kern County	134.8	122.1
SR-178	Kern County	2.9	3.6
Trona Rd	Inyo County	0.0	0.0
SR-127	Inyo County	38.9	37.9
Mesquite Valley Rd	Inyo County	0.0	0.0
Kingston Rd	Arizona	0.0	0.0
SR-15	Arizona	0.0	0.0
Nipton Rd	Arizona	0.0	0.0
SR-95	Arizona	0.0	0.0
Needle Hwy	Arizona	0.0	0.0
I-40	Arizona	0.0	0.0
Parker Dam Rd	Arizona	0.0	0.0
SR-62	Arizona	0.0	0.0
I-10	Arizona	0.0	0.0
I-8	Mexico	0.0	0.0
SR-186	Mexico	0.0	0.0
SR-7	Mexico	0.0	0.0

SR-111	Mexico	0.0	0.0
I-8	Imperial County	67.2	63.8
SR-78	Imperial County	48.6	43.4
SR-22	Imperial County	28.1	26.1
SR-79	San Diego	40.9	41.7
Pala Rd	San Diego	19.3	20.4
I-15	San Diego	23.8	23.1
Sandia Creek Rd	San Diego	6.7	6.7
De Luz Rd	San Diego	4.4	4.4
Tenaja Rd.	San Diego	6.5	6.5
I-5	San Diego	40.2	40.3

Appendix B: VMT Screening Maps



< -15% below WRCOG Regional Average (Screened)

0 to -15% below WRCOG Regional Average (Mitigatable)

Higher than WRCOG Regional Average (Challenge to Mitigate)

City Limits

County Boundary

RIVTAM Model (2012)
Daily Total VMT per Service Population
Comparison to WRCOG Regional Average

Appendix C: Transportation Projects That Do Not Require VMT Analysis

The following complete list is provided in the OPR Technical Advisory (December 2018, Pages 20-21) for transportation projects that "would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis:"

- 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 additional 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
- 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

PC RESOLUTION NO. 2020-

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF TEMECULA RECOMMENDING THAT THE CITY COUNCIL ADOPT A RESOLUTION ENTITLED "A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF TEMECULA TO ADOPT THE CEQA TRANSPORTATION VMT ANALYSIS GUIDELINES FOR PURPOSES OF ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT ("CEQA"), AND MAKING A FINDING OF EXEMPTION UNDER CEQA (LONG RANGE PLANNING PROJECT NO. LR18-1506)"

THE PLANNING COMMISSION OF THE CITY OF TEMECULA DOES HEREBY RESOLVE AS FOLLOWS:

Section 1. Procedural Findings. The Planning Commission of the City of Temecula does hereby find, determine and declare that:

A. The California Environmental Quality Act Guidelines ("CEQA Guidelines") encourage public agencies to develop and publish generally applicable "thresholds of significance" to be used in determining the significance of a project's environmental effects; and

B. CEQA Guidelines section 15064.7 (a) defines a threshold of significance as "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 less than significant"; and

C. CEQA Guidelines section 15064.7 (b) requires that thresholds of significance must be adopted by ordinance, resolution, rule, or regulations, developed through a public review process, and be supported by substantial evidence; and

D. Pursuant to CEQA Guidelines section 15064.7 (c), when adopting thresholds of significance, a public agency may consider thresholds of significance adopted or recommended by other public agencies provided that the decision of the agency is supported by substantial evidence; and

E. Senate Bill 743, enacted in 2013 and codified in Public Resources Code section 21099, required changes to the CEQA Guidelines regarding the criteria for determining the significance of transportation impacts of projects; and

F. In 2018, the Governor's Office of Planning and Research ("OPR") proposed, and the California Natural Resources Agency certified and adopted, new CEQA Guidelines section 15064.3 that identifies vehicle miles traveled ("VMT") – meaning the amount and distance of

automobile travel attributable to a project – as the most appropriate metric to evaluate a project's transportation impacts; and

G. As a result, automobile delay, as measured by "level of service" and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA; and

H. CEQA Guidelines section 15064.3 goes into effect on July 1, 2020, though public agencies may elect to be governed by this section immediately; and

I. Staff worked with Fehr & Peers to revise the City's Traffic Impact Analysis ("TIA") Guidelines and include a VMT Section (CEQA Transportation VMT Analysis Guidelines ("VMT Analysis Guidelines")) to ensure consistency with SB 743; and

J. On April 22, 2020, at a duly noticed public hearing, the Planning Commission, considered staff's presentation and reviewed the recommended thresholds of significance and the VMT Analysis Guidelines.

Section 2. Environmental Findings. The Planning Commission hereby makes the following environmental findings and determinations in connection with the adoption of this resolution:

In accordance with the California Environmental Quality Act ("CEQA"), the Planning Commission has been determined that the adoption of the VMT Thresholds and CEQA Transportation VMT Analysis 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 VMT Analysis Guidelines are not subject to CEQA (14 CCR § 15378(a)). In addition, the Thresholds and VMT Analysis 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 VMT Analysis 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).)

Section 3. Recommendation. The Planning Commission hereby recommends that the City Council of Temecula adopt the Resolution attached hereto as Exhibit "A" adopting the CEQA Transportation VMT Analysis Guidelines (which is included as Attachment A to the City Council resolution) as part of the Traffic Impact Analysis Guidelines thereby establishing the VMT thresholds of significance for transportation impact analysis under CEQA.

Section 4. **PASSED, APPROVED AND ADOPTED** by the City of Temecula Planning Commission this 22nd day of April, 2020.

Lanae Turley-Trejo, Chairperson

ATTEST:

Luke Watson
Secretary

[SEAL]

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE)ss
CITY OF TEMECULA)

I, Luke Watson, Secretary of the Temecula Planning Commission, do hereby certify that the forgoing PC Resolution No. 2020- was duly and regularly adopted by the Planning Commission of the City of Temecula at a regular meeting thereof held on the 22nd day of April, 2020, by the following vote:

AYES: PLANNING COMMISSIONERS:

NOES: PLANNING COMMISSIONERS:

ABSENT: PLANNING COMMISSIONERS:

ABSTAIN: PLANNING COMMISSIONERS:

Luke Watson
Secretary

RESOLUTION NO. 2020-

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

THE CITY COUNCIL OF THE CITY OF TEMECULA DOES HEREBY RESOLVE AS FOLLOWS:

Section 1. Procedural Findings. The City Council of City of Temecula does hereby find, determine and declare that:

A. The California Environmental Quality Act Guidelines ("CEQA Guidelines") encourage public agencies to develop and publish generally applicable "thresholds of significance" to be used in determining the significance of a project's environmental effects; and

B. CEQA Guidelines section 15064.7 (a) defines a thresholds of significance as "an identifiable quantitative, qualitative or performance level of a particular environmental effect, noncompliance 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 less than significant"; and

C. CEQA Guidelines section 15064.7 (b) requires that thresholds of significance must be adopted by ordinance, resolution, rule, or regulations, developed through a public review process, and be supported by substantial evidence; and

D. Pursuant to CEQA Guidelines section 15064.7 (c), when adopting thresholds of significance, a public agency may consider thresholds of significance adopted or recommended by other public agencies provided that the decision of the agency is supported by substantial evidence; and

E. Senate Bill 743, enacted in 2013 and codified in Public Resources Code section 21099, required changes to the CEQA Guidelines regarding the criteria for determining the significance of transportation impacts of projects; and

F. In 2018, the Governor's Office of Planning and Research ("OPR") proposed, and the California Natural Resources Agency certified and adopted, new CEQA Guidelines section 15064.3 that identifies vehicle miles traveled ("VMT") – meaning the amount and distance of automobile travel attributable to a project – as the most appropriate metric to evaluate a project's transportation impacts; and

G. As a result, automobile delay, as measured by "level of service" and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA; and

H. CEQA Guidelines section 15064.3 goes into effect on July 1, 2020, though public agencies may elect to be governed by this section immediately; and

I. Staff worked with Fehr & Peers to revise the City's Traffic Impact Analysis ("TIA") Guidelines and include a VMT Section (CEQA Transportation VMT Analysis Guidelines ("VMT Analysis Guidelines")) to ensure consistency with SB 743; and

J. On April 22, 2020, at a duly noticed public hearing, the Planning Commission, considered staff's presentation and reviewed the recommended thresholds of significance and the VMT Analysis Guidelines and recommended that the City Council adopt the VMT Analysis Guidelines; and

K. On April 23, 2020, at a duly noticed public hearing, the Public Traffic Safety Commission considered staff's presentation and reviewed the recommended thresholds of significance and the VMT Analysis Guidelines and recommended that the City Council adopt the VMT Analysis Guidelines.

Section 2. Environmental Findings. The City Council hereby makes the following environmental findings and determinations in connection with the adoption of this resolution:

In accordance with the California Environmental Quality Act ("CEQA"), the City Council has been determined that the adoption of the VMT Thresholds and CEQA Transportation VMT Analysis 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 VMT Analysis Guidelines are not subject to CEQA (14 CCR § 15378(a)). In addition, the thresholds and VMT Analysis 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 VMT Analysis 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).)

Section 3. Further Findings. The City Council of the City of Temecula hereby finds the thresholds of significance identified in the VMT Analysis Guidelines have been developed through a public review process and are supported by substantial evidence, as required by CEQA Guidelines section 15064.7.

Section 4. Approval of VMT Analysis Guidelines. The City Council of the City of Temecula hereby adopts the CEQA Transportation VMT Analysis Guidelines attached hereto as Exhibit "A" as part of the Traffic Impact Analysis Guidelines thereby establishing the VMT thresholds of significance for transportation impact analysis under CEQA.

Section 5. Certification. The City Clerk shall certify the adoption of this Resolution.

PASSED, APPROVED, AND ADOPTED by the City Council of the City of Temecula this day of May 2020.

James "Stew" Stewart, Mayor

ATTEST:

Randi Johl, City Clerk

[SEAL]

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE) ss
CITY OF TEMECULA)

I, Randi Johl, City Clerk of the City of Temecula, do hereby certify that the foregoing Resolution No. 2020- was duly and regularly adopted by the City Council of the City of Temecula at a meeting thereof held on the day of May, 2020, by the following vote:

AYES: COUNCIL MEMBERS:

NOES: COUNCIL MEMBERS:

ABSTAIN: COUNCIL MEMBERS:

ABSENT: COUNCIL MEMBERS:

Randi Johl, City Clerk

Notice of Public Hearing

A PUBLIC HEARING has been scheduled before the City of Temecula PLANNING COMMISSION to consider the matter described below:

CASE NO: LR18-1506 **APPLICANT:** City of Temecula

PROPOSAL: Long Range Project Number LR18-1506 to conform with State Law Senate Bill ("SB") 743 by replacing vehicular Level of Service (LOS) with Vehicle Miles Traveled (VMT) transportation analysis metric under the California Environmental Quality Act (CEQA).

RECOMMENDATION: Recommend that the City Council adopt a Resolution approving Vehicle Miles Traveled (VMT) thresholds for California Environmental Quality Act compliance related to transportation analysis.

ENVIRONMENTAL: The City has the adoption of this Resolution is not a "project" for purposes of CEQA, as that term is defined by Guidelines Section 15378. Specifically, this Resolution constitutes organizational or administrative activities of City government that will not result in direct or indirect physical changes in the environment. (Guidelines Section 15378(b) (5)). Therefore, because it is not a "project," this Resolution is not subject to CEQA's requirements. Further, even if this Resolution were deemed a "project" and therefore subject to CEQA, the Resolution would be covered by the general rule that CEQA applies only to projects that have the potential to cause a significant effect on the environment. (Guidelines Section 15061 (b) (3)). As an organizational or administrative activity which do not involve any commitment to any specific project which may result in a potentially significant physical impact on the environment, this Resolution does not have the potential to cause a significant effect on the environment and is therefore exempt under this general rule. Further, it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, and thus this Resolution is not subject to CEQA. (Guidelines Section 15061(b) (3)).

CASE PLANNER: Sara Toma, (951) 506-5185

DATE OF HEARING: April 22, 2020 **TIME OF HEARING:** 6:00 p.m.

PLACE OF HEARING: This meeting is being conducted utilizing teleconferencing and electronic means consistent with State of California Executive Order N-29-20 dated March 17, 2020, regarding the COVID-19 pandemic. The live stream of the meeting may be viewed on television and/or online. Details can be found at temeculaca.gov/tv. In accordance with Executive Order N-29-20, the public may only view the meeting on television and/or online and not in the Council Chamber.

The complete agenda packet (including any supplemental materials) will be available for viewing on the City's website – **TemeculaCA.gov** after 4:00 p.m. the Friday before the Planning Commission meeting. Due to the closure of the Library and other City Buildings and Facilities due to the COVID-19 pandemic, the complete agenda is only viewable on the City website at https://temeculaca.legistar.com/Calendar.aspx. For more information or have questions regarding this project, please contact Sara Toma (951) 506-5185.

Any petition for judicial review of a decision of the Planning Commission shall be filed within time required by, and controlled by, Sections 1094.5 and 1094.6 of the California Code of Civil Procedure. In any such action or proceeding seeking judicial review of, which attacks or seeks to set aside, or void any decision of the Planning Commission shall be limited to those issues raised at the hearing or in written correspondence delivered to the City Clerk at, or prior to, the public hearing described in this notice.

Submission of Public Comments: For those wishing to make public comments at the April 22, 2020 Planning Commission meeting, please submit your comments by email to be read aloud at the meeting by the Principal Management Analyst. Email comments must be submitted to Lynn Lehner at lynn.lehner@temeculaca.gov. Electronic comments on agenda items for the April 22, 2020 Planning Commission meeting may only be submitted via email and comments via text and social media (Facebook, Twitter, etc.) will not be accepted.

Reading of Public Comments: The Principal Management Analyst shall read all email comments, provided that the reading shall not exceed three (3) minutes, or such other time as the Planning Commission may provide, consistent with the time limit for speakers at a Planning Commission meeting. The email comments submitted shall become part of the record of the Planning Commission meeting.

Questions? Please call the Case Planner Sara Toma at (951) 506-5185 or the Community Development Department at (951) 694-6400.