

RESOLUTION NO. 2022-44

THE CITY COUNCIL OF THE CITY OF MARINA SHALL ADOPT VEHICLE MILES TRAVELED (VMT) AS A THRESHOLD OF SIGNIFICANCE FOR THE PURPOSES OF ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT PURSUANT TO SB 743.

WHEREAS, the State legislature of the State of California adopted the California Environmental Quality Act of 1970 (CEQA), as amended, and codified in Sections 21,000 et seq. of the Public Resources Code; and

WHEREAS, the Legislature directed the Secretary of the Natural Resources Agency to prepare State guidelines for the implementation of said act by public agencies; and

WHEREAS, Senate Bill 743, codified in Public Resources Code section 21099, required changes to the CEQA Guidelines requiring the criteria for determining the significance of transportation impacts of projects; and

WHEREAS, CEQA Guidelines section 15064.3 went into effect on July 1, 2020, and it identifies vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts; and

WHEREAS, automobile delay, as measured by level of service (LOS), no longer constitutes a significant environmental effect under CEQA. SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of development standards, but it may no longer constitute the basis for CEQA impact and mitigation. (Public Resources Code section 21099(e)(4)); and

WHEREAS, CEQA Guidelines section 15064.7(a) defines a threshold 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 be less than significant; and

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

WHEREAS, the City is adopting this VMT Policy to bring the City's transportation analysis methodology in line with state goals pursuant to SB 743; and

WHEREAS, the Planning Commission hosted a public meeting on February 24, 2022, to review the policy and adopted a resolution in support of this policy; and

WHEREAS, on February 23, 2022, the City of Marina received comments from Land Watch which have been incorporated herein and included as Exhibit E (Public Comments) to the staff report.

WHEREAS, the City Council reviewed the policy at a duly noticed public hearing dated March 15, 2022; and

WHEREAS, the City Council finds and determines, based upon staff and consultant reports and research as well as testimony in the record, that the revised CEQA thresholds of significance under consideration are consistent with State requirements as to how transportation impacts should be evaluated for purposes of CEQA review of projects. The revised thresholds are based upon the VMT metric that is specifically required in CEQA Guidelines section 15064.3. Additionally, the City's policy is consistent with and based upon review of the Governor's Office of Planning and Research (OPR) guidance.

NOW, THEREFORE BE IT RESOLVED by the City Council of the City of Marina that does hereby:

1. Adopt Vehicle Mile Traveled (VMT) as a threshold of significance for the purposes of assessing transportation impacts under the California Environmental Quality Act (CEQA).
2. Find that the action is exempt from CEQA pursuant to Section 15308 of the CEQA Guidelines.

PASSED AND ADOPTED by the City Council of the City of Marina at a regular meeting duly held on the 15th day of March, by the following vote:

AYES, COUNCIL MEMBERS: Burnett, Biala, Delgado

NOES, COUNCIL MEMBERS: None

ABSENT, COUNCIL MEMBERS: Medina Dirksen, Berkley

ABSTAIN, COUNCIL MEMBERS: None

Bruce C. Delgado, Mayor

ATTEST:

Anita Sharp, Deputy City Clerk

DRAFT SB 743 Implementation Guidelines**City of Marina****March 7, 2022**

1.0 Background

In 2013, SB 743 was signed into law by California Governor Jerry Brown with a goal of reducing Greenhouse Gas (GHG) emissions, promoting the development of infill land use projects and multimodal transportation networks, and to promote a diversity of land uses within developments. One significant outcome resulting from this statute is the removal of automobile delay and congestion, commonly known as level of service (LOS), as a basis for determining significant transportation impacts under the California Environmental Quality Act (CEQA).

The Governor's Office of Planning and Research (OPR) selected Vehicle Miles Traveled (VMT) as the principal measure to replace LOS for determining significant transportation impacts. VMT is a measure of total vehicular travel that accounts for the number of vehicle trips and the length of those trips. OPR selected VMT, in part, because jurisdictions are already familiar with this metric. VMT is already used in CEQA to study other potential impacts such as GHG, air quality, and energy impacts and is used in planning for regional Sustainable Communities Strategies (SCS).

VMT also allows for an analysis of a project's impact throughout the jurisdiction rather than only in the vicinity of the proposed project allowing for a better understanding of the full extent of a project's transportation-related impact. It should be noted that SB 743 does not disallow the City of Marina to use LOS for other planning purposes outside the scope of CEQA.

2.0 Use of This Document

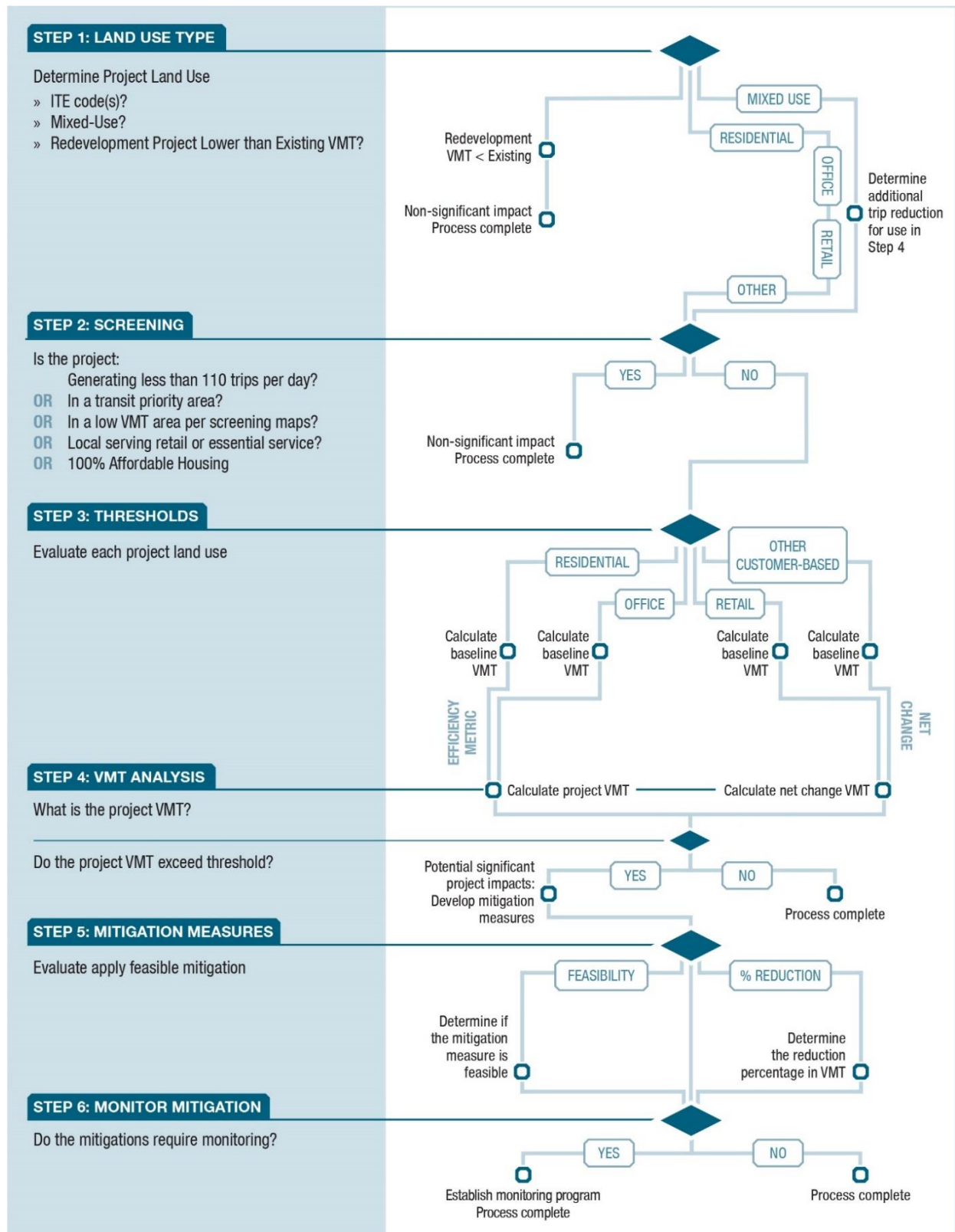
Note that although this document includes footnotes and references to other documents, this document has been developed to serve both as the basis of SB 743 implementation and VMT analysis within the City. Accordingly, the document does not require the reader to reference the footnotes unless they are interested in understanding the technical basis of elements of this document's preparation. Analysis guidelines are separated into two distinct approaches, those that relate to land use projects (Section 3.0) and those that relate to transportation improvement projects (Section 4.0). If a project includes both land use and transportation improvement elements, analysis would be required to be carried out for both.

3.0 Land Use Projects

An approach to identify transportation impacts under CEQA for land-use that closely align with guidance provided within the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* (2018). While the OPR guidance related to SB 743 has been a helpful introduction to using VMT to evaluate projects, it does not provide a complete solution. There are a multitude of complex practical issues that are not addressed by the OPR guidance. OPR Guidance does not specifically address land uses beyond residential, office and retail, and it provides latitude on some elements of implementation. In response

to this, a specific series of analysis steps for SB 743 project evaluation have been developed to clarify requirements and reduce potential confusion. **Exhibit 1** provides a graphical representation of this analysis process.

Exhibit 1 – Process for CEQA VMT Analysis for Land Use Projects



Step 1: Determine Land Use Type

During the initial step, land use projects will need to be evaluated for the following considerations:

- **Land use type.** For the purposes of analysis, the Institute of Transportation Engineers (ITE) land use codes serve as the basis of land use definitions. Although it is recognized that VMT evaluation tools and methodologies are typically not fully sensitive to some of the distinctions between some ITE categories, the use of ITE land use codes is useful for maintaining consistency across analyses, determining trip generation for other planning level tools, and maintaining a common understanding of trip making characteristics amongst transportation professionals. The ITE land use code is also used as an input into the VMT Analysis Tool
- **Mixed Use.** If there are multiple distinct land uses within the project (residential, office, retail, etc.), they will be required to be analyzed separately unless they are determined to be insignificant to the total VMT. Mixed use projects are permitted to account for internal capture which depending on the methodology may require a distinct approach not covered in this documentation. This analysis would be the responsibility of the applicant and will need to be prepared by a qualified transportation professional and approved by the City of Marina.
- **Redevelopment projects.** As described under the Non-Significant Screening Criteria section, redevelopment projects which have lower VMT than the existing on-site use can be determined to have a non-significant impact.

Step 2: Screen for Non-Significant Transportation Impact

The purpose of this step is to determine if a presumption of a non-significant transportation impact can be made on the facts of the project. The guidance in this section is primarily intended to avoid unnecessary analysis and findings that would be inconsistent with the intent of SB 743. A detailed CEQA transportation analysis will not be required for land use elements of a project that meet the screening criteria shown in **Exhibit 2**. Note that as the lead agency, the City will make the ultimate determination as to the whether the presumption of a non-significant transportation impact is appropriate for a given project. If a project has multiple distinct uses (residential, office, retail, etc.), only those elements of the project that are not screened out would require further evaluation to determine transportation significance for CEQA purposes.

Exhibit 2 – Screening Criteria

Screening Criteria	OPR Guidance
Small Projects¹ This applies to projects with low trip generation per existing CEQA exemptions. Note that this includes any land use type (residential, office, etc.)	Presumed to cause a less-than-significant impact: - Project generation is less than 110 trips per day per the ITE Manual or other acceptable source determined by City of Marina Unless: - It is inconsistent with the Sustainable Communities Strategy as determined by the City of Marina
Projects Near High Quality Transit² High quality transit provides a viable option for many to replace automobile trips with transit trips resulting in an overall reduction in VMT.	Presumed to cause a less-than-significant impact: - Within a ½ mile of an existing major transit stop (maintains a service interval frequency of 15 minutes or less during the morning and afternoon peak commute periods). Unless: - Has a Floor Area Ratio (FAR) of less than 0.75; or - Includes more parking, excluding on-street parking, for use by residents, customers, or employees of the project than required by the City of Marina zoning code; or - It is inconsistent with the Sustainable Communities Strategy as determined by the City of Marina; or - Replaces affordable residential units with a smaller number of moderate- or high-income residential units
Local-Serving Retail³ The introduction of new Local-serving retail has been determined to reduce VMT by shortening trips that will occur out of necessity (groceries, other essentials, etc.).	Presumed to cause a less-than-significant impact: - No single store on-site exceeds 50,000 square feet; and - Project is local-serving as determined by the City of Marina Unless: - The nature of the service is regionally focused as determined by the City of Marina

¹ 2018 OPR Guidance, page 12² 2018 OPR Guidance, page 13³ 2018 OPR Guidance, page 16

Exhibit 2 – Screening Criteria

Screening Criteria	OPR Guidance
Affordable Housing⁴ Lower-income residents make fewer trips on average, resulting in lower VMT overall.	Presumed to cause a less-than-significant impact: - A high percentage of affordable housing is provided as determined by the City of Marina Unless: - The percentage of affordable housing is determined by the City of Marina to not be high in relation to the residential element of a project
Local Essential Service⁵ As with Local-Serving Retail, the introduction of new Local Essential Services shortens non-discretionary trips by putting those goods and services closer to residents, resulting in an overall reduction in VMT.	Presumed to cause a less-than-significant impact: Building is less than 50,000 square feet: and Land Use is : - Day care center; or - Public K-12 School; or - Police or Fire facility; or - Medical/Dental office building; or - Government offices (in-person services such as post office, library, and utilities) Unless: - The nature of the service is regionally focused as determined by the City of Marina
Map-Based Screening This method eliminates the need for complex analyses, by allowing existing VMT data to serve as a basis for the screening smaller developments.	Presumed to cause a less-than-significant impact: - Area of development is under threshold as shown on screening map as allowed by City of Marina Unless: - Represent significant growth as to substantially change regional travel patterns as determined by the City of Marina

⁴ 2018 OPR Guidance, page 14. As described, “Evidence supports a presumption of less than significant impact for a 100 percent affordable residential development (or the residential component of a mixed-use development) in infill locations. Lead agencies may develop their own presumption of less than significant impact for residential projects (or residential portions of mixed-use projects) containing a particular amount of affordable housing, based on local circumstances and evidence.”

⁵ Based on assumption that, like local-serving retail, the addition of necessary local in-person services will reduce VMT given that trips to these locations will be made irrespective of distance given their non-discretionary nature.

Exhibit 2 – Screening Criteria

Screening Criteria	OPR Guidance
Note that screening is limited to residential and office projects.	
Redevelopment Projects⁶ Projects with lower VMT than existing on-site uses, can under limited circumstances, be presumed to have a non-significant impact. In the event this screening does not apply, projects should be analyzed as though there is no existing uses on site (project analysis cannot take credit for existing VMT).	Presumed to cause a less-than-significant impact: ▪ Project replaces an existing VMT-generating land use and does not result in a net overall increase in VMT Unless: ▪ The project replaces an existing VMT-generating land use and results in a net overall increase in VMT

⁶ 2018 OPR Guidance, Page 18

Step 3: Determine Significance Threshold and Methodology

The purpose of this step is to determine the threshold of significance for application to a land use project. Significance thresholds are based on land use type, broadly categorized as efficiency and net change metrics. Efficiency metrics include VMT/Capita and Work VMT/employee⁷. As described in **Exhibit 3**, “Net Change” refers to the net change in regional VMT. “Net Change” is used for elements that include a significant customer base, such as commercial uses, although it can extend to a variety of uses that have similar characteristics.

Exhibit 3 - Significance Threshold and Methodology

Example Details	Efficiency	Net Change
Example Land Use	Residential, Professional Office, Industrial	Retail, Medical Office, Sports Venue
Example VMT Thresholds	Per capita, per employee	Region VMT change
Customer Component	No	Yes
Allowable Methods	Non-Significant Screening Criteria, The City of Marina VMT Analysis Tool, Travel Demand Model, Other methods as deemed appropriate by the City of Marina	Non-Significant Screening Criteria, Travel Demand Model, Other methods as deemed appropriate by the City of Marina

For projects with a significant customer base it is typically appropriate to separate employee trip characteristics from the customer base unless the customer base is minimal in nature. Under these circumstances, it is most appropriate to evaluate the total of the delta in regional VMT resultant from the customer base plus the delta of VMT resultant from employees based on the following formula:

(number of employees) x (estimated VMT/employee – threshold VMT/employee)

The threshold of significance will accordingly correspond to the “Net Change” threshold as described in **Exhibit 3**. Under these circumstances, it is most appropriate to evaluate this total Net Change as the basis for evaluating the outcome of mitigations in terms of determining transportation significance although each element of the project should be tallied separately for the purposes of clarity.

As provided for under Allowable Methods, note that some projects may require approaches and analysis methods not described within this document given their unique locations or that the proposed land use is not appropriately represented in the AMBAG Travel Demand Model. This can also be the case if there is unique data associated with a project such as a market study or other relevant data.

⁷ Work VMT specifically applies to commute trips as represented by the attractions in the Travel Demand Model. Refer to Appendix A for additional information

VTM Thresholds of Significance

OPR suggests a 15 percent VMT reduction relative to existing local or regional average VMT levels. The thresholds of significance recommended by OPR, as they relate to the City of Marina, are summarized in **Exhibit 4**.

Exhibit 4 - OPR suggested VMT Thresholds of Significance

Land Use	OPR Guidance ⁸
Residential	15% below existing city-wide average VMT per capita
Office	15% below existing county-wide average VMT per employee
Retail	Net increase in regional VMT

Based on these criteria the VMT thresholds of significance shown in **Exhibit 5** have been established.

Exhibit 5 - VMT Thresholds of Significance

Land Use	VMT Threshold	Basis
Residential	10.9 VMT/capita ⁹	15% below existing city-wide average VMT per capita.
Office	6.6 Work VMT/Employee ¹⁰	15% below existing county-wide average Work VMT per employee
Retail	Net regional change	Using the county as the basis
Other Employment	Work VMT/Employee ¹¹	15% below existing county-wide average Work VMT per employee for similar land uses
Other Customer	Net regional change	Using the county as the basis

Note that the inclusion of “Other Employment” and “Other Customer” refers to all other service and goods providers that are not included in the office/retail categories. As shown they follow a similar approach to the office/retail categories with the principal difference being that the average/basis for of the threshold would be the aggregation of the specific “other” land use across the county (i.e. an industrial project would use industrial uses, etc.).

Based on improvements to methods and data as well as other modeling modifications there will be periodic updates to the numerical threshold values shown, however the relative approach for calculating them should remain the same. The values in the current VMT Analysis Tool, discussed in the

⁸ 2018 OPR Guidance, Pages 15-16

⁹ Residential VMT specifically applies to all Home-Based trips residential trips as represented in the Travel Demand Model. Refer to Appendix A for additional information.

¹⁰ Work VMT specifically applies to commute trips as represented in the Travel Demand Model. Refer to Appendix A for additional information

¹¹ Work VMT specifically applies to commute trips as represented in the Travel Demand Model. Refer to Appendix A for additional information

next section, will supersede the information provided in the table above. Additional thresholds for various employment types are also provide in the VMT Analysis Tool.

VTM Analysis Tool

The City of Marina has developed a VMT Analysis Tool for use in SB 743 land use project analysis. The purpose of the tool is to calculate VMT for a land use project. As with any VMT Analysis Tool, there are distinct limitations in terms of its application including limits on the type and size of development that can be applied to. Note that it is anticipated that the tool will continue to evolve in response to data or methodological changes and as such it is important that the most current version of the tool be utilized. Broadly, the VMT Analysis Tool provides the following information:

- Institute of Transportation Engineers (ITE) Trip Generation
- VMT Threshold Analysis
- Greenhouse Gas (GHG) Estimation
- Transportation Demand Management (TDM) Evaluation

The VMT Analysis methodology is summarized in **Appendix A**.

Step 4: Scope of Analysis Agreement

Prior to undertaking VMT analysis, a scope compliant with the City of Marina's requirements must be prepared by the project applicant and submitted to the City for approval. Given the potential complexities of some uses, particularly those not identified as residential, retail, or office, an agreement regarding the threshold and methodology is important to avoid analysis that is not compliant with the City of Marina's requirements.

Step 5: Analysis and Mitigation

During this step, the analysis agreed to under Step 4 should be completed. Relevant documentation providing enough detail that assumptions are clearly understandable, and methods that can be replicated should be provided along with the results of the VMT analysis for the proposed project.

If a significant transportation impact is identified, feasible mitigation measures to avoid or reduce the impact must be identified. CEQA requires that mitigation measures are included in the project's environmental assessment. OPR provides a list of potential measures to reduce VMT but gives the lead agency (the City of Marina in this case) full discretion in the selection of mitigation measures.

The type and size of the project will determine the most appropriate mitigation strategies for VMT impacts. For large projects such as general plans or specific plans, VMT mitigations should concentrate on the project's density and land use mix, site design, regional policies, and availability of transit, bicycle, and pedestrian facilities. For smaller projects such as an individual development project, VMT mitigations will typically require the preparation of a transportation demand management (TDM) program. A TDM program is a combination of strategies to reduce VMT. The program is created by an applicant for their land use project based on a list of strategies agreed to with the City of Marina.

The City of Marina has developed a list of potential TDM strategies appropriate for their jurisdiction and what magnitude of VMT reduction could be achieved. The selection process was guided by the California

Air Pollution Control Officers Association (CAPCOA) recommendations found in the 2010 publication *Quantifying Greenhouse Gas Mitigation Measures*. The area context of the City of Marina also influenced the type of TDM strategies that were selected. CAPCOA has found strategies with the largest VMT reduction in rural areas include vanpools, telecommute or alternative work schedules, and master planned communities with design and land-use diversity to encourage intra-community travel. Based on empirical evidence, CAPCOA found the cross-category maximum for all transportation-related mitigation measures is 15% for suburban settings.

Appendix B summarizes available TDM strategies along with the maximum VMT reduction, applicable land use application, and complementary strategies. The City of Marina's VMT Analysis Tool includes the TDMs summarized in **Appendix B**. Note that it should not be assumed that a project implementing these measures would in fact attain that maximum percentage reduction. The actual VMT reduction for a project should be based on project-specific analysis using the analytic tools and methods identified in the CAPCOA guidance. Note also, that the percentage VMT reductions from multiple mitigation measures may not be additive. The actual VMT reduction should be based on project-specific analysis using the analytic tools and methods identified in the CAPCOA guidance, including CAPCOA's caps on attainable maximum VMT reductions where multiple mitigation measures are adopted

Step 6: Mitigation Monitoring

As required by CEQA, the City of Marina will require ongoing mitigation monitoring and reporting. The specifics of this will be developed on a project basis.

4.0 Transportation Projects

Depending on the specific nature of a transportation project; it can alter trip patterns, trip lengths, and even trip generation. Research has determined that capacity-enhancing projects can and often do increase VMT. This phenomenon is commonly referred to as "induced demand". The result of these increases in VMT can often both be measured in congestion increases and negative impacts to air quality including GHG emissions. While methods are generally less developed for the analysis of induced demand compared to other areas of transportation analysis, there is still the need to quantify and understand its impact to the transportation system considering the requirements of SB 743.

Similarly, to land use projects, the approach to transportation project analysis closely align with the 2018 OPR Guidance. In terms of analysis, the analyst should first determine whether the transportation project has been prescreened and determined to have a non-significant impact as described in the following section.

Screen for Non-Significant Transportation Impact

At the discretion of the City of Marina, the following improvements maybe presumed to result in a non-significant impact¹²:

1. Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts;

¹² 2018 OPR Guidance, Page 20

2. 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
3. Roadside safety devices or hardware installation such as median barriers and guardrails
4. 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
5. Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety
6. 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
7. Addition of roadway capacity on local or collector streets, based on the City’s functional classification, provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
8. 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
9. Addition of a new lane that is permanently restricted to use only by transit vehicles
10. Reduction in number of through lanes
11. 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
12. Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
13. Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
14. Timing of signals to optimize vehicle, bicycle, or pedestrian flow
15. Installation of roundabouts or traffic circles
16. Installation or reconfiguration of traffic calming devices
17. Adoption of or increase in tolls
18. Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase
19. Initiation of new transit service
20. Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes

21. Removal or relocation of off-street or on-street parking spaces
22. Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
23. Addition of traffic wayfinding signage
24. Rehabilitation and maintenance projects that do not add motor vehicle capacity
25. Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
26. Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel
27. Installation of publicly available alternative fuel/charging infrastructure
28. 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

Significance Threshold and Methodology

For projects that increase roadway capacity and are not identified under the Non-Significant Screening Criteria in the prior section, the significance criterion should be change in regional VMT. A finding of a significant impact would be determined if a transportation project results in a net increase in regional VMT. As a practical matter, any roadway with more than a quarter mile in new roadway travel lane (through lanes) should be evaluated for induced demand. A competent transportation professional will be required to provide a basis for this evaluation that considers available data, roadway context, and tools. Depending on the location and nature of the roadway this may be best accomplished using a the AMBAG Travel Demand Model.

Appendix A

VMT Analysis Methodology

Travel Demand Models (TDMs) are broadly considered to be amongst the most accurate of available tools to assess regional and sub-area VMT. The Association of Monterey Bay Area governments (AMBAG) maintains the regional travel demand model as a part of the Metropolitan Transportation Plan/Sustainable Communities Strategy program (MTP/SCS) that includes Monterey County and the City of Marina. The latest available version of the AMBAG TDM was developed in 2018.

The 2018 Base Year model scenario was used for the baseline conditions and 2040 Future Year model scenario was used for the cumulative conditions in the City. The incorporated cities included in the model are major contributors of the trips throughout Monterey County during a typical weekday.

As many of AMBAG Region's daily trips originate from or are destined for areas outside of the County such as the Bay area and Santa Clara County (external trips), their total length could not be computed solely using the AMBAG TDM, additional analysis was required. The length of these trips was determined using two main processes, using Big Data and AMBAG TDM output files. Data was obtained from Teralytics that summarized the number of trips to and from the AMBAG Region to the surrounding Counties at the Census Tract level for the entire month of October 2019. The distance between each Census Tract was determined by using the TransCAD software, the modeling platform the AMBAG TDM runs on. The multipath analysis function within the TransCAD software was used to determine the point to point distance between the centroid of each Census Tract using the internal pathing algorithm that determines the shortest path along the roadway network between the centroid of each Census Tract pair. The shortest path between each AMBAG Region Census Tract and each non-AMBAG Region Census Tract that contained at least one trip was multiplied by the share of the total trips to and from each Census Tract within the AMBAG Region to determine the average trip length to and from Census Tracts. The average trip length was applied to each TAZ based on the TAZ to Census Tract association and multiplied by the number of external trips to and from that TAZ to determine the total external VMT by TAZ.

Model Zone Structure

VMT was computed at Traffic Analysis Zone (TAZ) level to determine the thresholds as well as to allow for comparisons among different areas throughout the County.

Socio-Economic Data

Socioeconomic data (SED) and other model inputs are associated with each TAZ. Out of several different variables in the model SED, the VMT analysis mainly focused on population, the number of households, the number of students, and types of employment that are used in the trip generation component. VMT computation was focused on the number of households in each TAZ and employment variables by 6 industries to determine rest of the trips. Employment variables used in the model are listed below.

Employment by Industry type:

1. Agriculture
2. Construction

3. Industrial and Manufacturing
4. Retail and Food
5. Service (White Collar, non-government jobs)
6. Public Administration (Government jobs)

Trip Generation

The AMBAG TDM runs a series of complex steps to estimate daily trip productions and attractions by various trip purposes for each TAZ. The trip purposes are listed below.

Model Trip Purpose:

1. Home-Based Work (HBW)
2. Home-Based Shopping (HBShop)
3. Home-Based School, K-12 (HBSchool)
4. Home-Based University (HBUniv)
5. Home-Based Other (HBOther)
6. Non-Home-Based Work (NHBW)
7. Non-Home-Based Other (NHBO)
8. Visitor Shop
9. Visitor Tourist

The production model uses several variables such as number of workers, household income, age, household size and car availability depending on the trip purpose. Trip productions for every TAZ in the model were compiled separately by each trip purpose. The attraction model uses employment categories for the HW trip purpose, whereas it uses the employment categories and number of students (K-12 and University) for all non-HW trip purposes. The attraction model estimates trip attractions to each TAZ by regression coefficients that vary by employment type. Trip attractions for every TAZ were compiled by each purpose and by each employment type based on these regression coefficients.

Person Trips, Vehicle Occupancy, Trip Distance

Trip productions and attractions were compiled after the mode choice step, and only auto trips were used for the analysis. After the vehicle trip productions and attractions were computed for each trip purpose, trip lengths were applied for each zone pair from the skim matrices in the model to compute the production and attraction VMT by purpose.

VMT by Land Use Type

The residential VMT was computed by combining the production VMT for all the Home-Based trip purposes. VMT for non-residential land uses was computed from the attraction VMT by appropriate trip purposes and regression coefficients used in the attraction model.

Residential and non-residential VMT by each TAZ were computed and average VMT were determined by City, County and Region levels to determine the City's thresholds.

Appendix B

City of Marina					
TDM Measure #	Transportation Demand Management Measure	Description	TDM Type	Max VMT Reduction	VMT Reduction Type
Transit Strategies					
1	Transit Stops	Coordinate with local transit agency to provide bus stop near the site. Real time transportation information displays support on-the-go decision making to support sustainable trip making. Only get a reduction on a non-HQT line, cannot get both.	Infrastructure	3%	All
2	Safe and Well-Lit Access to Transit	Enhance the route for people walking or bicycling to nearby transit (typically off-site). Provide Emergency 911 phones along these routes to enhance safety.	Infrastructure	1%	All
3	MST Trolley	Implement project-operated or project-sponsored neighborhood shuttle serving residents, employees, and visitors of the project site.	Incentive	13.4%	All
4	Transit Subsidies	Involves the subsidization of transit fare for residents and employees of the project site. This strategy assumes transit service is already present in the project area. Pays for employees to use local transit. This could either be a discounted ticket or a full-reimbursed transit ticket. Include Trolley considerations.	Incentive	20%	All
Communication & Information Strategies					

City of Marina					
TDM Measure #	Transportation Demand Management Measure	Description	TDM Type	Max VMT Reduction	VMT Reduction Type
5	Mandatory Travel Behavior Change Program	Involves the development of a travel behavior change program that targets individuals' attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. Provide a web site that allows employees to research other modes of transportation for commuting. Employee-focused travel behavior change program that targets individuals attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits.	Incentive	4%	All
6	Promotions & Marketing	Involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices with passive educational and promotional materials. Marketing and public information campaign to promote awareness of TDM program with an on-site coordinator to monitor program.	Incentive	4%	All
Commuting Strategies					
7	Employer Sponsored Vanpool or Shuttle	Implementation of employer-sponsored employee vanpool or shuttle providing new opportunities for access to connect employees to the project site.	Incentive / Infrastructure	13.4%	All

City of Marina					
TDM Measure #	Transportation Demand Management Measure	Description	TDM Type	Max VMT Reduction	VMT Reduction Type
8	Emergency Ride Home (ERH) Program	Provides an occasional subsidized ride to commuters who use alternative modes. Guaranteed ride home for people if they need to go home in the middle of the day due to an emergency or stay late and need a ride at a time when transit service is not available. Ecology Action is preferred vendor. This supplemental to the other trip reduction strategies. ADD to 5 and 6	Incentive	9%	Commute
9	On-site Childcare	Provides on-site childcare to remove the need to drive a child to daycare at a separate location.	Infrastructure	2%	All
10	Telecommuting	Four-Ten work schedule results in 20% weekly VMT reduction, 10% trip reduction equals 15% VMT reduction	Incentive	20%	All
11	Alternative work schedule	Alternative Fridays off (Nine-Ten schedule)	Incentive	10%	All
Shared Mobility Strategies					
12	Mandatory Ride Amigos-Share Program	Increases vehicle occupancy by providing ride-share matching services, designating preferred parking for ride-share participants, designing adequate passenger loading/unloading and waiting areas for ride-share vehicles, and providing a website or message board to connect riders and coordinate rides. Need a point person form the business on-site	Incentive	15%	Commute

City of Marina					
TDM Measure #	Transportation Demand Management Measure	Description	TDM Type	Max VMT Reduction	VMT Reduction Type
13	Employee/Employer Car Share	Implement car sharing to allow people to have on-demand access to a vehicle, as-needed. This may include providing membership to an existing program located within 1/4 mile, contracting with a third-party vendor to extend membership-based service to an area, or implementing a project-specific fleet that supports the residents and employees on-site.	Incentive	0.7%	All
		Provide an on-site car vehicle for employees to use for short trips. This allows for employees to run errands or travel for lunch.	Incentive	2%	Commute
14	Designated Parking Spaces for Car Share Vehicles	Reserved car share spaces closer to the building entrance.	Infrastructure	1%	All
15	School Carpool Program	Implements a school carpool program to encourage ride-sharing for students.	Incentive	15.8%	School
Bicycle Infrastructure Strategies					
16	Bike Share	Developer on-site bike share facilities	Incentive / Infrastructure	7%	All
17	Implement/Improve On-street Bicycle Facility	Implements or provides funding for improvements to corridors and crossings for bike networks identified within a one-half mile buffer area of the project boundary, to support safe and comfortable bicycle travel.	Infrastructure	0.625%	All
18	Include Bike Parking in excess of City Code	Implements long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations	Infrastructure	0.625%	All
19		Implements additional end-of-trip bicycle facilities to support	Infrastructure	0.625%	All

City of Marina					
TDM Measure #	Transportation Demand Management Measure	Description	TDM Type	Max VMT Reduction	VMT Reduction Type
	Include Secure Bike Parking and Showers	safe and comfortable bicycle travel.		4%	Commute
Neighborhood Enhancement Strategies					
20	Neighborhood Improvement Projects	Implements neighborhood improvement measures throughout and around the perimeter of the project site that encourage people to walk, bike, or take transit within the development and to the development from other	Infrastructure	1%	All
21	Pedestrian Network Improvements	Implements pedestrian network improvements throughout and around the project site that encourages people to walk.	Infrastructure	2%	All
Miscellaneous Strategies					
22	Virtual Care Strategies for Hospitals/Health care providers/MOB/C clinic	Resources to allow patients to access healthcare services or communicate with healthcare staff through online or off-site programs.	Infrastructure	15%	Hospital Visitors
23	On-site Affordable Housing	Provides on-site affordable housing in excess of inclusionary rates % of units is the % reduction developer can get.	Infrastructure	4%	All
Parking Strategies					
24	Reduce Parking Supply	Changes on-site parking supply to provide less than the amount required by municipal code. Permitted reductions could utilize mechanisms such as TOC, Density Bonus, Bike Parking ordinance, or locating in a Specific Plan Area.	Infrastructure	12.5%	All
25	Parking Cash-Out	Provide employees a choice of forgoing current parking for a cash payment to be determined by the employer. The higher the cash payment, the higher the reduction.	Incentive	7.7%	Commute

City of Marina					
TDM Measure #	Transportation Demand Management Measure	Description	TDM Type	Max VMT Reduction	VMT Reduction Type
26	Residential Area Parking Permits	Implementation of residential permit parking zones for long-term use of on-street parking in residential areas.	Incentive	0.25%	All

VMT CALCULATOR

Version 1.0 Build Date 1_12_21

PROJECT INFORMATION

Project Name	
Address	
TAZ	
Project Context/Setting	Low Density Suburb

ANALYSIS YEARS

Analysis Year	2015
---------------	------

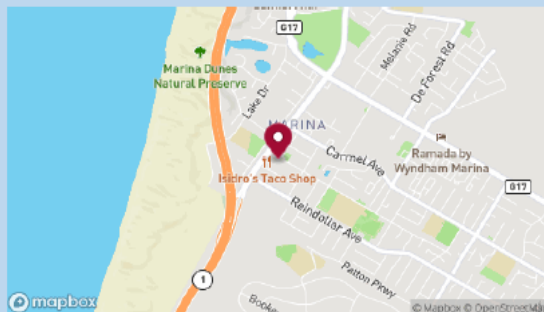
LAND USE INFORMATION

VMT Land Use Type	Residential
Trip Gen Land Use Type	210 Single-Family Detached Housing
	Accepted: Common Land Use
Dwelling Unit(s)	0
Mixed-Use Adjustment	0%

PRESUMPTIONS OF LESS THAN SIGNIFICANT IMPACT

☐	Affordable Housing
☐	Within a 1/2 mile of Major Transit Stop
☐	Local Retail (<50,000 Sq Ft)
☐	Less than 110 Trips per Day

Trip Gen less than 110, consider checking the above box



TRANSPORTATION SIGNIFICANCE

This tool is only intended for projects of 2,000 trips or less.

	PROJECT	REDUCTIONS	PROJ. WITH MITIGATION
VMT/Capita	0.0	0.0	0.0
Daily Trips	0	0	0

Enter valid address or TAZ#

Average (VMT/Capita)	12.8
Threshold (15% below Average)	10.9
Significant Impact?	No

VMT per Capita



TRANSPORTATION DEMAND MANAGEMENT (TDM) STRATEGIES

PARKING STRATEGIES

TRANSIT STRATEGIES

COMMUNICATION & INFORMATION STRATEGIES

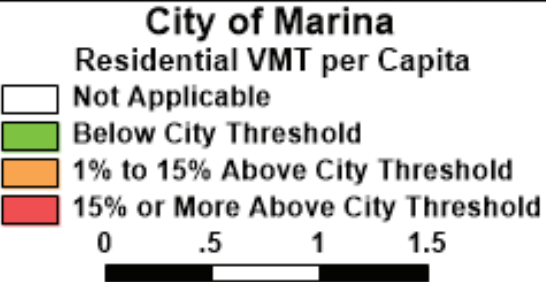
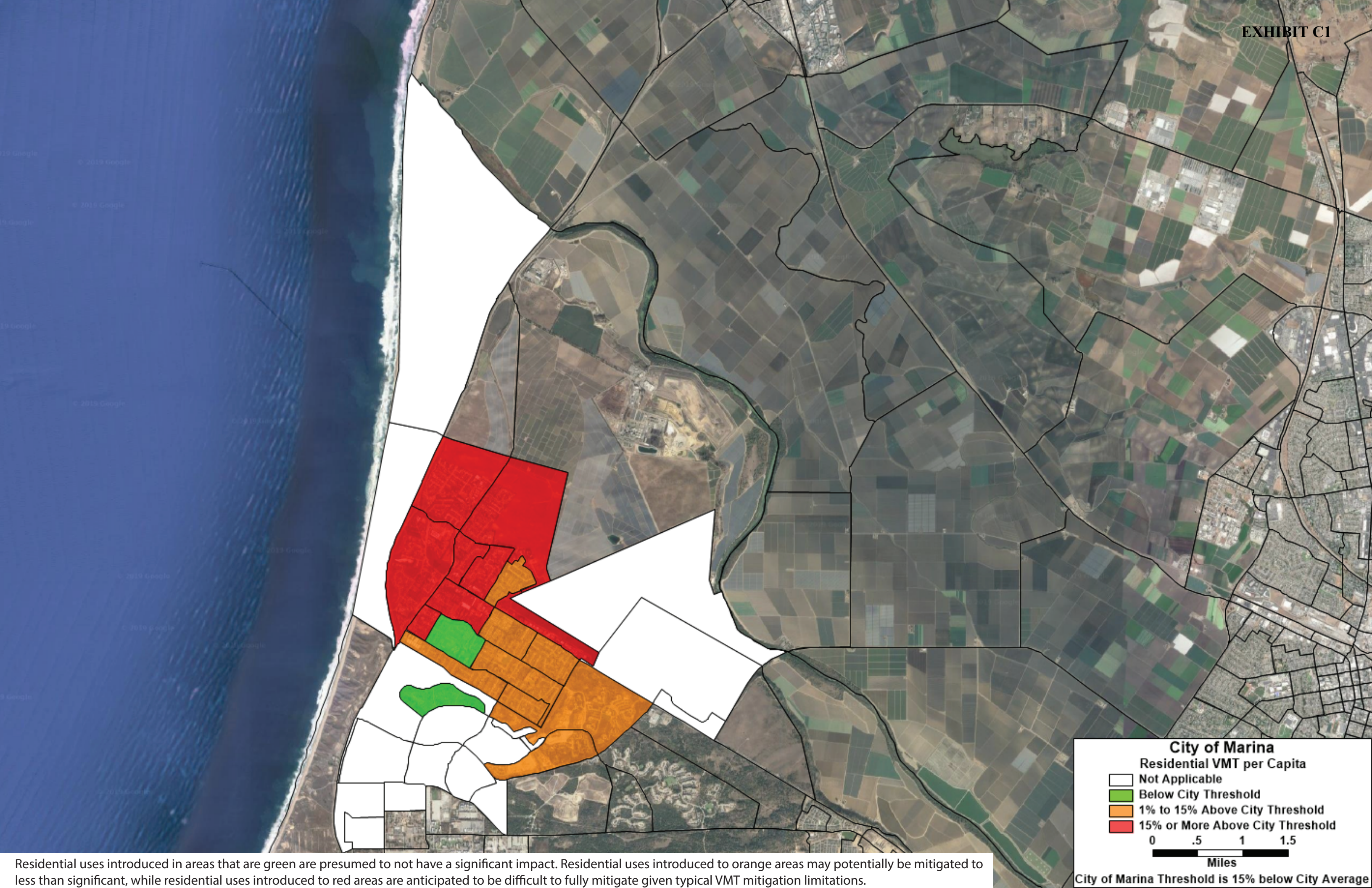
COMMUTING STRATEGIES

SHARED MOBILITY STRATEGIES

BICYCLE INFRASTRUCTURE STRATEGIES

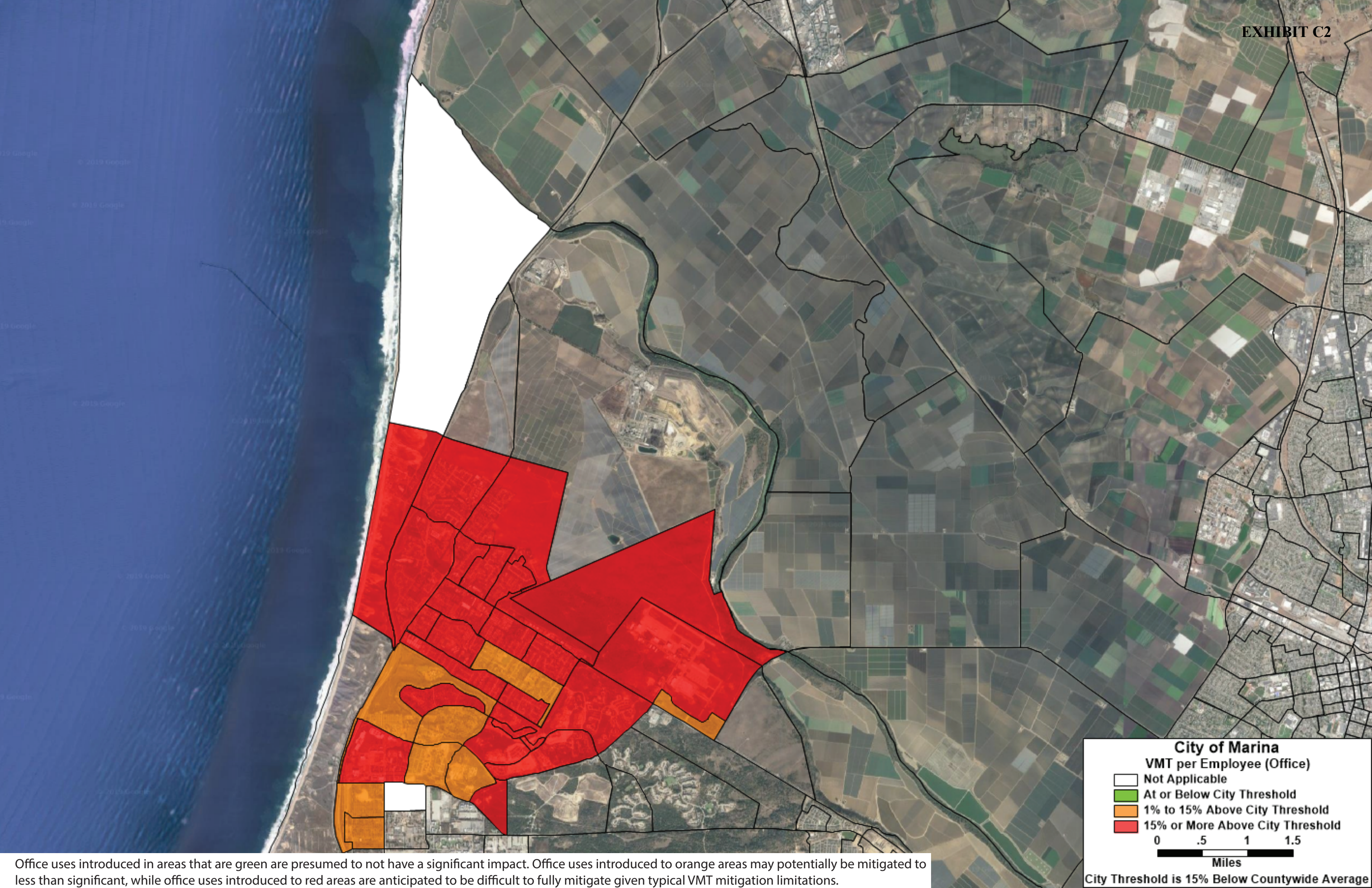
NEIGHBORHOOD ENHANCEMENT STRATEGIES

MISCELLANEOUS STRATEGIES



Residential uses introduced in areas that are green are presumed to not have a significant impact. Residential uses introduced to orange areas may potentially be mitigated to less than significant, while residential uses introduced to red areas are anticipated to be difficult to fully mitigate given typical VMT mitigation limitations.

City of Marina Threshold is 15% below City Average



City of Marina

VMT per Employee (Office)

- Not Applicable
- At or Below City Threshold
- 1% to 15% Above City Threshold
- 15% or More Above City Threshold

0 .5 1 1.5
Miles

City Threshold is 15% Below Countywide Average

Office uses introduced in areas that are green are presumed to not have a significant impact. Office uses introduced to orange areas may potentially be mitigated to less than significant, while office uses introduced to red areas are anticipated to be difficult to fully mitigate given typical VMT mitigation limitations.

Guido Persicone

From: Guido Persicone
Sent: Wednesday, February 23, 2022 5:07 PM
Subject: FW: Marina Planning Commission February 24, 2021, Agenda Item No. 6a draft VMT policy
Attachments: CORRECTION: Marina Planning Commission February 24, 2021, Agenda Item No. 6a draft VMT policy; FW: CORRECTION: Marina Planning Commission February 24, 2021, Agenda Item No. 6a draft VMT policy; CORRECTION (#2): Marina Planning Commission February 24, 2021, Agenda Item No. 6a draft VMT policy

FYI-I received some comments about the VMT project from LandWatch. We will address said comments tomorrow night.

Guido F. Persicone

From: Michael DeLapa <execdir@landwatch.org>
Sent: Tuesday, February 22, 2022 12:39 PM
To: Guido Persicone <gpersicone@cityofmarina.org>
Cc: Anita Shepherd-Sharp <AShepherd@cityofmarina.org>
Subject: Marina Planning Commission February 24, 2021, Agenda Item No. 6a draft VMT policy

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

RE: Marina Planning Commission February 24, 2021, Agenda Item No. 6a draft VMT policy

Dear Mr. Persicone,

Landwatch has preliminarily reviewed the proposed VMT-based thresholds of significance for transportation impacts. LandWatch generally supports using the 15% reduction threshold, consistent with the OPR guidance.

However, we recommend that the Planning Commission direct staff to address the following items before submitting the thresholds to the Council for approval. These clarifications will make the thresholds consistent with CEQA and easier to administer. They will also eliminate potential confusion.

- The thresholds of significance are consistently identified as presumptions. They should be clearly identified as rebuttable presumptions. The thresholds document should state with reference to any and all of its identified thresholds:
 - *A VMT analysis is required if a fair argument is made that the presumption should not apply to a particular project.*
- Each of the mitigation measures in Appendix B, which are based on the CAPCOA guidance, lists the "Max VMT reduction" for that measure in percentage terms. The thresholds document should state:
 - *There is no assumption that any project implementing these measures would in fact attain that maximum percentage reduction. The actual VMT reduction for a project should be based on project-specific analysis using the analytic tools and methods identified in the CAPCOA guidance.*
- Many of the mitigation measures in Appendix B are overlapping and not additive. The thresholds document should state:

EXHIBIT D

- *There should be no assumption that the percentage VMT reductions from multiple mitigation measures are additive. The actual VMT reduction should be based on project-specific analysis using the analytic tools and methods identified in the CAPCOA guidance, including CAPCOA's caps on attainable maximum VMT reductions where multiple mitigation measures are adopted.*
- The screening criteria allows for exemptions for small projects that are inconsistent with the Sustainability Community Strategy and Development in Low-VMT Areas/Map-Based Screening. The Guidelines should specify what counts as a "small project" and what constitutes inconsistency with the SCS since that is a very vague plan.
- The legends on the VMT maps in Exhibits D1 and D2 are unclear.
 - In Exhibit D1 it is not clear if the term "County Threshold" is supposed to reference the County average or to reference some percentage reduction below that average that represents a threshold of significance, e.g., a 15% reduction from the County average. If the reference is to the County average, the legend should say so. If the reference is to a "threshold" that is less than the County average, the legend should identify the relation of that threshold to the County average, e.g., 15% below. Furthermore, it is unclear why the legends in D1 distinguish the orange areas that are "1% to 15% Above County Threshold" from the red areas that are "15% or More Above County Threshold." If an area is above the "County Threshold," whether "Threshold" means "average" or even "15% below average," it is treated the same regardless whether it is 1% above or 15% above. What matters here is whether an area is below the "Threshold," which should be identified as 15% below the County Average.
 - Exhibit D2 suffers from exactly the same lack of clarity, except that the references are to the "City Threshold." Does "City Threshold" mean City average or 15% below that average? In addition, it should not matter whether an area is 1% above the "City Threshold" or 15% above it since the relevant question is simply whether the area is 15% below the City average.

We look forward to seeing these clarifications in the thresholds document to be submitted to the Council for approval. Thank you for your consideration.

Best regards,

Michael

Please subscribe to the LandWatch newsletter, "like" us on Facebook and follow us on Twitter.

Michael D. DeLapa
Executive Director
LandWatch Monterey County
execdir@landwatch.org
650.291.4991 m

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Facebook facebook.com/LandWatchMontereyCounty/

Guido Persicone

From: Michael DeLapa <execdir@landwatch.org>
Sent: Tuesday, February 22, 2022 1:53 PM
To: Guido Persicone
Subject: CORRECTION: Marina Planning Commission February 24, 2021, Agenda Item No. 6a draft VMT policy

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Mr. Persicone,

Please note this correction to my prior letter, i.e., our recommendation for defining "small project" should state "what constitutes consistency," not "what constitutes inconsistency."

- The screening criteria allows for exemptions for small projects that are inconsistent with the Sustainability Community Strategy and Development in Low-VMT Areas/Map-Based Screening. The Guidelines should specify what counts as a "small project" and what constitutes ~~in~~consistency with the SCS since that is a very vague plan.

Thank you.

Best regards,

Michael

Please subscribe to the LandWatch newsletter, "like" us on Facebook and follow us on Twitter.

Michael D. DeLapa
Executive Director
[LandWatch Monterey County](#)
execdir@landwatch.org
650.291.4991 m

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Facebook facebook.com/LandWatchMontereyCounty/

Guido Persicone

From: Guido Persicone
Sent: Tuesday, February 22, 2022 2:37 PM
To: Schmitt, Michael; Frederik Venter (frederik.venter@kimley-horn.com)
Subject: FW: CORRECTION: Marina Planning Commission February 24, 2021, Agenda Item No. 6a draft VMT policy

From: Michael DeLapa <execdir@landwatch.org>
Sent: Tuesday, February 22, 2022 1:53 PM
To: Guido Persicone <gpersicone@cityofmarina.org>
Subject: CORRECTION: Marina Planning Commission February 24, 2021, Agenda Item No. 6a draft VMT policy

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Mr. Persicone,

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Thank you.

Best regards,

Michael

Please subscribe to the LandWatch newsletter, "like" us on Facebook and follow us on Twitter.

Michael D. DeLapa
Executive Director
[LandWatch Monterey County](https://www.landwatch.org)
execdir@landwatch.org
650.291.4991 m

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Facebook facebook.com/LandWatchMontereyCounty/

Guido Persicone

From: Michael DeLapa <execdir@landwatch.org>
Sent: Tuesday, February 22, 2022 4:20 PM
To: Guido Persicone
Subject: CORRECTION (#2): Marina Planning Commission February 24, 2021, Agenda Item No. 6a draft VMT policy

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Mr. Persicone,

To follow up my earlier email, the staff report incorrectly references the threshold that is actually set out in the proposed thresholds document as follows:

Residential: A proposed project exceeding a level of 15% above the existing countywide average VMT per capita may indicate a significant transportation impact.

Office: A proposed office project exceeding a level of 15% above the below existing countywide average VMT per employee may indicate a significant transportation impact.

We assume these references should be to levels 15% below, not above the average.

Thank you.

Best regards,

Michael

Please subscribe to the LandWatch newsletter, "like" us on Facebook and follow us on Twitter.

Michael D. DeLapa
Executive Director
[LandWatch Monterey County](#)
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March 7, 2022

Item No. **11b**

Honorable Mayor and Members
of the Marina City Council

City Council Meeting
of March 15, 2022

THE CITY COUNCIL CONSIDER ADOPTING RESOLUTION NO. 2022-, ADOPTING A VEHICLE MILES TRAVELED (VMT) AS A THRESHOLD OF SIGNIFICANCE FOR THE PURPOSES OF ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT PURSUANT TO SB 743.

RECOMMENDATION: City Council consider

1. Adopting Resolution No. 2022-, adopting Vehicle Mile Traveled (VMT) as a threshold of significance for the purposes of assessing transportation impacts under the California Environmental Quality Act (CEQA); and
2. Find that the action is exempt from CEQA pursuant to Section 15308 of the CEQA Guidelines.

SUMMARY:

In 2013, SB 743 was signed into law by California Governor Jerry Brown with a goal of reducing Greenhouse Gas (GHG) emissions, promoting the development of infill land use projects and multimodal transportation networks, and to promote a diversity of land uses within developments. One significant outcome resulting from this statute is the removal of automobile delay and congestion, commonly known as level of service (LOS), as a basis for determining significant transportation impacts under the California Environmental Quality Act (CEQA).

The Governor's Office of Planning and Research (OPR) selected Vehicle Miles Traveled (VMT) as the principal measure to replace LOS for determining significant transportation impacts. VMT is a measure of total vehicular travel that accounts for the number of vehicle trips and the length of those trips

BACKGROUND:

CEQA is a state statute that requires public agencies to study and identify potentially significant environmental impacts of proposed projects and avoid or reduce those impacts to a level of insignificance, to the extent feasible.

One component of CEQA is to evaluate future transportation impacts of various projects. Senate Bill (SB) 743, codified in Public Resources Code section 21099, was signed into law in 2013. It required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to revise the criteria for determining the significance of transportation impacts, and to provide that automobile delay shall not be considered a significant impact on the environment under CEQA, except in locations specifically identified in the guidelines, if any.

The Legislative intent of SB 743 is to ensure transportation impacts continue to be addressed under CEQA, and to promote statewide goals of public health, infill development, and greenhouse gas reduction. In December 2018, CEQA Guideline section 15064.3 was adopted, identifying the amount and distance of automobile travel attributable to a project, or VMT, as the most appropriate metric for transportation impact analysis. Statewide application of CEQA Guideline section 15064.3 was required beginning July 1, 2020. This is a shift away from the delay-based level of service (LOS) metric that historically has been used for evaluating traffic impacts. The updated state CEQA Guidelines require all California cities to use VMT-based thresholds for CEQA impact analyses. In 2021, the City of Marina hired Kimley-Horn and Associates (transportation consultants) to assist with the necessary work to implement the VMT metric, including updating and running the Association of Monterey Bay Area Governments' (AMBAG) Transportation Model, mapping, and generating thresholds of significance standards for Marina. That work developed the recommendations contained in this report.

The VMT metric considers the distance that new residents or employees of a proposed development project would travel on average as the result of the project. VMT is advantageous to developers proposing compact, mixed-use developments within an established urban limit because it “rewards” a project for being in close proximity to daily destinations such as schools, grocery stores, jobs, and services.

Likewise, projects that are on the far edges of town would more likely have high VMT because daily destinations are further away. If a project generates VMT above the stated thresholds of significance, common ways to reduce VMT on a project level are investments in Transportation Demand Management (TDM) such as transit passes, bike and pedestrian programs, car share, on-site childcare facilities, and other means. Other ways include the construction of or contribution to bike and pedestrian or high-occupancy vehicle projects.

OPR recommends a threshold of significance of 15% below the regional average VMT. SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of development standards, but it may no longer constitute the basis for CEQA impact and mitigation (Public Resources Code section 21099(e)(4)). For example, the City may adopt a fair share traffic impact fee, to ensure that new development bears a proportionate share of the cost of capital facilities and other costs necessary to accommodate such development.

PROPOSED VMT POLICY

In recognition of SB 743 and OPR’s VMT recommendations, the recommendations in this report include VMT thresholds, screening criteria, and mitigation to ensure consistency with CEQA Guidelines.

Additionally, the City partnered with Kimley-Horn to develop a VMT Tool that uses the AMBAG model to determine whether a proposed project would create a significant impact. The tool evaluates a project’s anticipated VMT based on its land use type. This was done in compliance with SB 743 and OPR’s “*Technical Advisory on Evaluating Transportation Impacts in CEQA*”

RECOMMENDED SCREENING CRITERIA

CEQA Guidelines section 15063 and OPR’s “Technical Advisory on Evaluating Transportation Impacts in CEQA” allow for development of screening criteria used to identify when a project should be expected to cause a less-than-significant impact on transportation without conducting a detailed CEQA VMT analysis. The following criteria are recommended by OPR and staff:

Small Projects: If a project generates or attracts less than 110 trips per day and is consistent with the General Plan and Sustainable Communities Strategy, that project may be assumed to cause a less-than-significant transportation impact.

Development in Low-VMT Areas/Map-Based Screening: Maps showing existing VMT values within a city are referred to as heat maps. These maps display colors representing the level of variation from a local or regional VMT reference average for a jurisdiction. The purpose of these heat maps is to determine if a project could be in an area with low existing VMT. OPR advises that residential and office projects in areas of low VMT that are compatible with surrounding development in terms of density, mix of uses, and transit accessibility will tend to exhibit similarly low VMT. These projects would, therefore, be presumed to have a less-than-significant VMT impact. OPR guidance suggests using regional as opposed to citywide geographies for reviewing office development, as employees often commute from outside the city boundary to their jobs. Under the recommended approach for map-based screening, projects located in low VMT areas (zones with VMT that is at least 15% below the regional average VMT) would be presumed to have a less-than-significant transportation impact under CEQA.

Proximity to Transit Stations: Lead agencies should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within 1/2 mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT. This presumption would not apply, however, if project-specific or location-specific

information indicates that the project will still generate significant levels of VMT, as might be the case if the project has a Floor Area Ratio (FAR) of less than 0.75, includes parking in excess of requirements, is inconsistent with local and regional plans, or replaces affordable units with a smaller number of market rate units. “High quality transit corridor” and “major transit stops” are defined in the Public Resources Code. “Major transit stop” means 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. A “high quality transit corridor” means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. Affordable Residential Development:

Affordable Housing Development: Adding affordable housing to infill locations improves jobs-housing match, in turn shortening commutes and reducing VMT. Projects that are 100% affordable residential development, or the residential component of a mixed-use development, in infill locations shall be assumed to have a less-than-significant impact on transportation under CEQA. Furthermore, a project which includes any affordable residential units may factor the effect of the affordability on VMT into the assessment of VMT generated by those units.

RECOMMENDED THRESHOLDS OF SIGNIFICANCE

If a project is not screened out with the criteria outlined above, then it shall be subject to a detailed CEQA VMT Analysis. Should a project exceed the threshold of significance, a menu of accepted transportation demand management (TDM) options is available to reduce the project VMT to an acceptable level. OPR recommends lead agencies use an efficiency metric (reduction per capita or employee) to define thresholds of significance for residential and employment land use projects. OPR suggests that a 15% VMT reduction relative to regional average VMT levels is achievable at the project level for a variety of land uses and is consistent with achieving the State’s climate goals. OPR and staff recommend the following thresholds of significance:

Residential: A proposed project exceeding a level of 15% above the existing countywide average VMT per capita may indicate a significant transportation impact.

Office: A proposed office project exceeding a level of 15% above the below existing countywide average VMT per employee may indicate a significant transportation impact.

Retail: A net increase in total VMT may indicate a significant transportation impact. Note: because new retail development can redistribute some trips rather than create all new trips, estimating the total change in VMT is the best way to analyze retail. Consider that there is currently a popular Store X four miles away. If Store X opens a new store two miles away, trips that would have normally gone further distances to access that store are now making shorter trips.

All other land uses: A net increase in total VMT may indicate a significant transportation impact. Mixed Use Projects: Each component of the mixed-use project shall be evaluated independently and the threshold of significance for each project type shall apply.

Redevelopment: If a redevelopment project results in a lower VMT than the VMT being generated by the existing land use, the project is assumed to have a less-than-significant impact. If the project increases the net overall VMT, the thresholds above should apply.

Finally, it should be noted that the City will update the City’s VMT thresholds and methodology on an as needed basis to reflect changes in CEQA requirements, new methodology development, or refinement of process moving forward. As such, the City shall regularly review these guidelines for applicability, and project sponsors and consultants should contact the City to ensure that they are applying the most recent guidelines for project impact assessment. In summary, the Planning Commission should receive a report and presentation, accept public comment, and provide a recommendation to the City Council.

SUMMARY OF VMT POLICY IMPLEMENTATION

In summary, below is a chart that will be helpful to the Planning Commission to understand how City will be implementing the draft VMT policy in the near term.

- Step 1 – Determine if project is ministerial or discretionary
- Step 2 – Determine ITE land use
- Step 3 – Screen for Non-Significance Transportation Impact
- Step 4 – Determine Significance Threshold and Methodology
- Step 5 – Develop Scope Agreement and Complete VMT Analysis
- Step 6 – Identify Mitigation Measures
- Step 7 – Monitor Mitigation

FISCAL IMPACT:

The original contract was entered into with Kimley Horn Consultant in an amount not to exceed \$25,090 to complete the VMT policy. A contract amendment for \$6,350 was processed to ensure the consultant was available at public hearings before the Planning Commission and City Council.

COMMUNITY INPUT

The week of February 24, 2022 City staff received comments from Land Watch. Their comments were incorporated into the VMT policy and are include as Exhibit E to this staff report.

ENVIRONMENTAL REVIEW:

The adoption of the new local CEQA threshold of significance for transportation impacts will not have a significant environmental impact and therefore is exempt from CEQA pursuant to Section 15308 of the California Code of Regulations because the action is undertaken by the City for the protection of the environment.

CONCLUSION:

This request is submitted for City Council consideration and comment.

Respectfully submitted,

Guido F. Persicone, AICP
Community Development Director
City of Marina

REVIEWED/CONCUR:

Layne Long
City Manager
City of Marina

Exhibit A-Draft VMT Policy
Exhibit B-Marina VMT Tool
Exhibit C1-VMT Employment Heat Maps
Exhibit C2-VMT VMT Per Capita Heat Maps
Exhibit D-Land Watch Project Comments

