



Staff Report

TO: City Council
FROM: Christina Taylor, Community Development Director
DATE: June 16, 2020
SUBJECT: **SB 743 Vehicle Miles Traveled (VMT) Thresholds for California Environmental Quality Act (CEQA) Compliance Related to Transportation Analysis**

Background and Analysis:

Senate Bill (SB) 743 changes how transportation impacts are measured under the California Environmental Quality Act (CEQA) from using vehicle level of service (LOS) to using Vehicle Miles Traveled (VMT). Historically, delay and congestion were the metrics used when evaluating transportation impacts. To implement the legislation, lead agencies will need to determine appropriate VMT methodologies, thresholds, and feasible mitigation measures. Since VMT is a new methodology to analyze transportation impacts, there was a need to develop appropriate guidance for projects subject to environmental review. The guidance is to ensure that all projects subject to review by that agency use the same data, approaches, and analytical tools.

A study was conducted by the Western Riverside Council of Governments (WRCOG) to assist its member agencies in understanding the specific questions that need to be addressed when making these determinations and to provide research, analysis, and other evidence to support their final SB 743 implementation decisions. The goal of the study was to provide jurisdictions facts to help develop a record. The recommendations provided are direct recommendations from the WRCOG analysis with some adjustments based on local conditions. SB 743 must be implemented by lead agencies by July 1, 2020.

Since SB 743 represents a significant departure from current practice, the following questions must be addressed 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?; and
3. Mitigation – what would constitute feasible mitigation measures for a VMT impact given the land use and transportation context of the WRCOG region?

The methodology to forecast 'project-generated VMT,' the VMT thresholds, and the mitigation measures utilized must be adopted by each jurisdiction.

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 the Southern California Association of Governments' (SCAG) 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 subregion.

Based on the different options analyzed, it is recommended to utilize the Riverside County Travel Demand Model (RIVTAM / RIVCOM) and the VMT per service population data, as noted in the WRCOG analysis. Jurisdictions and technical experts have been utilizing RIVTAM since 2009, so there is a familiarity with the model. Furthermore, a new version of the Riverside County Travel Demand Model is being developed by WRCOG and will be ready for use by Fall 2020. The new version of the model will be updated and refined to improve compliance with SB 743 expectations (i.e., full external trip lengths).

Tools Assessment: The capabilities of travel forecasting models along with 11 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.

For thresholds that are based on an efficiency form of VMT, a customized forecasting and screening tool was also recommended, which would use RIVTAM model inputs and outputs. This tool would be utilized to provide an initial screening of potential VMT

impacts for projects and provide evidence to support presumptions of less than significant impact findings. The sketch model tools were determined to be most appropriate for testing VMT mitigation, with CalEEMod, GreenTRIP Connect, and TDM+ being the most effective. Since these tools rely on transportation demand management (TDM) strategies to reduce VMT, an important limitation was highlighted that many of these strategies are dependent on building tenants, which can change over time. Hence, relying on TDM programs tied to tenants would likely result in the need for on-going monitoring to verify performance.

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 the Governor's Office of Planning and Research (OPR). The project team, led by Fehr & Peers, identified four threshold options for consideration by lead agencies.

1. Thresholds consistent with OPR's Technical Advisory, recommending that proposed developments generate VMT per person that is 15% below existing VMT per capita;

Unsuitable. The analysis provided by WRCOG and Fehr & Peers shows that a rural to suburban community like Beaumont without a well-developed transportation system is unlikely to achieve anywhere near a 15% reduction in VMT regardless of project-specific mitigation. If this threshold is selected, more projects would need to prepare EIRs so that a statement of overriding consideration could be adopted. This would substantially increase the cost and time associated with larger development projects.

2. Thresholds consistent with Lead Agency air quality, greenhouse gas emissions reduction, and energy conservation goals;

Unsuitable. While the City prepared its own Climate Action Plan (CAP) it is aged and is likely inadequate to provide support for the mitigation measures. The City has not adopted its own goals for air quality and energy conservation, relying instead on the California Building Code Title 24, guidance from the South Coast Air Quality Management District, and the CEQA process.

3. Thresholds consistent with the Regional Transportation Plan / Sustainable Communities Strategy future year VMT projects by jurisdiction or subregion; and

Recommended. The portions of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that affect Beaumont are based on the land

use element of the General Plan. As such, using this option assumes that projects consistent with the General Plan are also consistent with the RTP/SCS and should not require additional analysis for VMT. Projects that require amendment to the General Plan that would trigger an EIR would need to complete a VMT analysis using the methodology described above. Other amendments to the General Plan would need to be evaluated on a case-by-case basis. Rather than the 15% reduction in VMT recommended in the OPR guidance, staff is recommending that future projects demonstrate that they will reduce existing VMT by at least 3%. Projects that cannot demonstrate a 3% reduction in VMT will be required to conduct additional analysis and add mitigation as appropriate. If project design or operational features cannot reduce VMT below the threshold then an EIR may be required in order for the City to consider a statement of overriding considerations.

4. Thresholds based on baseline VMT performance by jurisdiction or subregion.

Unsuitable. The City could adopt its own baseline VMT performance threshold after conducting its own study and then independently maintain that threshold. Currently the City doesn't have the resources or necessary data to ensure compatibility with the regional modelling. In addition, the threshold would need nearly constant maintenance as conditions in the City and region change. While a certain amount of maintenance is needed for any methodology, using the regional approach in #3 ensures that the City is consistent with others in the region, and that the model is regularly updated.

Based on the research conducted by WRCOG, which is provided (attachment B) to this report, it is recommended that the jurisdiction utilize a threshold consistent with the Regional Transportation Plan / Sustainable Communities Strategy future year VMT projects by jurisdiction or subregion, and reduce VMT by 3% below the jurisdiction's current average VMT per service population per household, or below the subregion's average VMT.

Mitigation

TDM strategies and its effectiveness for reducing VMT were reviewed and assessed for relevancy. Given the jurisdiction's rural / 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 low-street bicycle network improvements,
- encouraging telecommuting and alternative work schedules, and
- 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 Program (TUMF) and new mitigation program concepts. While the TUMF 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 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.

Updated Traffic Impact Analysis Guidelines

Beaumont's Traffic Impact Analysis Guidelines have been revised to ensure consistency with SB 743 implementation. The revision incorporates VMT guidance consistent with the information from the WRCOG SB 743 Implementation Pathway Study and updates to the LOS guidelines currently being utilized.

The VMT guidelines are tiered from the WRCOG study and include "likely" VMT thresholds of significance that would be considered by each member jurisdiction. The guidelines refer to the WRCOG screening tool that was developed for the SB 743 Implementation Pathway Study and provides directions for model use of projects that are likely not screened out. Mitigation measures and methods for quantification have been identified.

In addition, the current guidelines were updated to meet state-of-the-practice analysis techniques for LOS assessment. The guidelines should be updated in a manner that is easy to adjust and revise to coincide with local conditions. The existing language in the guidelines was also modified to reference improvements required instead of historic CEQA terminology in order to distinguish between CEQA and non-CEQA requirements.

Lastly, the LOS naming was simplified to be more consistent with requirements in other jurisdictions statewide.

Fiscal Impact:

None.

Recommended Action:

Waive the full reading and adopt by title only, "A Resolution of the City Council of the City of Beaumont Adopting 'Vehicle Miles Traveled' Thresholds of Significance for Purposes of Analyzing Transportation Impact Under the California Environmental Quality Act."

Attachments:

- A. Resolution
- B. Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment
- C. SB743 Bill Text