



STAFF REPORT

December 7, 2022
File Number 1050-30

SUBJECT

ADOPTION OF THE CITY OF ESCONDIDO VMT EXCHANGE PROGRAM

DEPARTMENT

Development Services Department, Engineering Services

RECOMMENDATION

Request that the City Council adopt Resolution No. 2022-162, adopting the VMT Exchange Program and certifying/adopting the associated Initial Study/Negative Declaration prepared for the project.

Staff Recommendation: Approval (Andrew Firestine, Development Services Director and Julie Procopio, City Engineer)

Presenter: Julie Procopio, City Engineer

ENVIRONMENTAL STATUS

An Initial Study/ Negative Declaration (Exhibit B to Resolution 2022-162) was prepared pursuant to California Environmental Quality Act (CEQA) section 15074. The document was circulated for public review from October 27 through November 16, 2022. Staff received correspondence from Caltrans with general comments regarding coordination when projects impact Caltrans' right-of-way; other comments received were requests for additional information. A Notice of Determination (NOD) was prepared and will be filed with the County Clerk of San Diego.

FISCAL ANALYSIS

The cost to prepare the VMT Exchange Program was included in the General Fund budget. The cost for review of Traffic Impact studies (including VMT analysis) is generally reimbursed by applicants through payment of adopted fees. Projects and programs identified in the VMT Exchange Program will be funded through condition of development entitlement process.

PREVIOUS ACTION

On April 21, 2021, City Council approved an update to the City of Escondido Transportation Impact Analysis Guidelines (TIAG) that set the CEQA VMT threshold of 85% of the regional mean for residential and office development, in conformance with SB 743.



CITY of ESCONDIDO

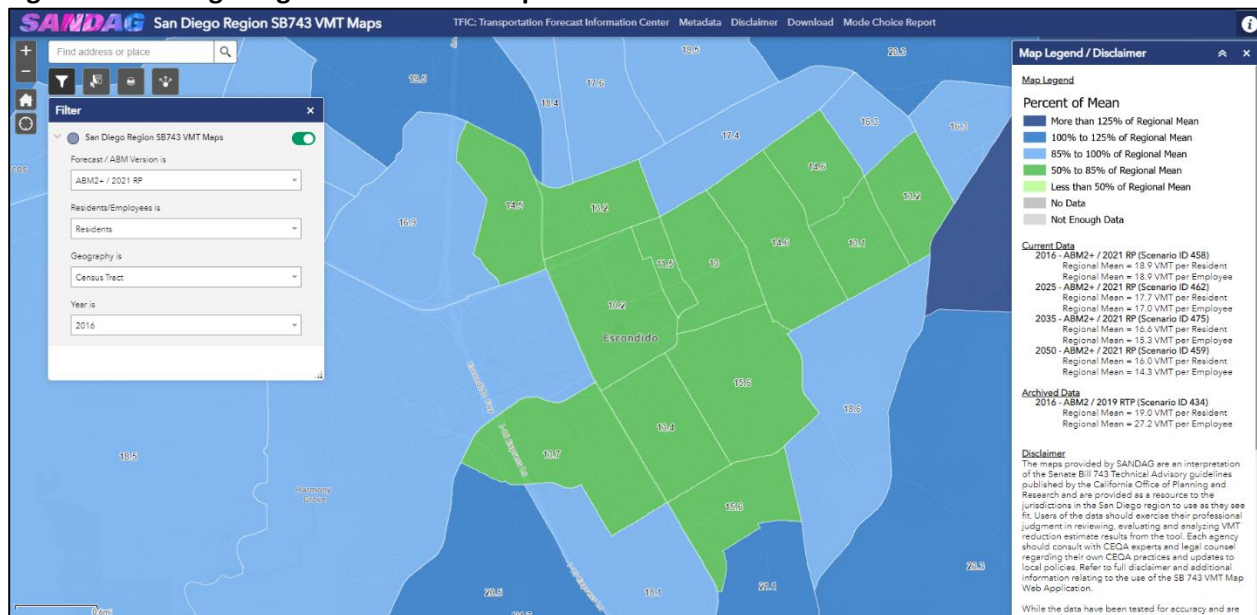
STAFF REPORT

BACKGROUND

In 2013, Senate Bill 743 required changes to the California Environmental Quality Act (“CEQA”) Guidelines regarding the criteria for determining the significance of transportation impacts of projects. In 2018, the Governor’s Office of Planning and Research, and the California Natural Resources Agency, certified and adopted new CEQA Guidelines, which identified the metric “vehicle miles traveled” (VMT), or the amount and distance of automobile travel attributable to a project, as the most appropriate metric to evaluate a project’s transportation impacts. Further, CEQA Guidelines require that lead agencies, for purposes of CEQA, evaluate the transportation impacts of a project using the VMT metric. Statewide direction under SB 743 set a target to achieve VMT efficiency of 85% of the area average.

In compliance with SB 743, projects that do not meet screening criteria for size or transit proximity and that are located outside of VMT efficient areas (depicted in green below) are required to conduct VMT analysis. San Diego Association of Government (SANDAG) has developed this VMT Map to assist in determining if a project site is located within a VMT efficient area. **Figure 1** below shows a sample SANDAG VMT map. Projects located outside of the green census tracts have potential for VMT impacts under CEQA.

Figure 1: San Diego Region SB743 VMT Map



If the VMT analysis determines that the project will generate VMT in excess of the threshold (85% of the regional mean), CEQA requires that the project identify and implement feasible mitigation measures to bring the VMT impacts to below this threshold of significance. Projects that are unable to identify mitigation measures to mitigate VMT impacts to below the significance threshold are required to prepare an Environmental Impact Report (EIR).



CITY of ESCONDIDO

STAFF REPORT

Examples of VMT mitigation measures include integrating affordable housing, pricing/unbundling parking, employee rideshare programs, and employee transit pass program. While there are a number of VMT mitigation measures available to office projects, staff has found that identifying mitigation options for residential projects in suburban areas, particularly for single family homes, can be challenging since there are limited options for on-site mitigation for residential projects. Further, mitigation strategies available may fall short of the required VMT reductions.

PROPOSED PROGRAM

The VMT Exchange Program (Exhibit “C” to Resolution 2022-162) is a voluntary program designed to streamline the ability for development projects to meet VMT targets by identifying mitigation measures that could serve to facilitate or encourage residents to walk, bike or take transit as substitutes for driving trips. Examples of potential mitigation measures include filling in gaps in the sidewalk network, providing crosswalks, bike lanes, pedestrian countdown signals, or bus shelters on existing transit lines. These improvements would preferably be constructed in the vicinity of the proposed development to provide mobility options that reduce VMT created from the project. However, improvements can also be constructed in other areas of the city to enhance mobility options and reduce citywide VMT.

Other types of non-infrastructure mitigation measures are under consideration as future additions to the Program, such as providing commute alternatives, car-sharing, transit passes, travel demand management and clean energy shuttles. The VMT Exchange Program is a living document that will be updated periodically to reflect the addition of VMT reducing projects and/or to reflect current research on the project/program’s effectiveness at reducing VMT.

The Program uses the State guidance from the California Air Pollution Control Officer Association *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (Handbook). The Program considers specific inputs or variables from the series of formulas provided in the Handbook to calculate how various improvements lead to the reduction of VMT. Established metrics and measurements are applied to assess the rate of change in one variable relative to another. Reduction of VMT associated with specific improvement types may first be calculated on an overall Citywide basis and then segregated to a per unit basis. Some examples include:

Improvement	Unit	VMT Reduction
Fill in Gap in Sidewalk Network	Per mile	303 VMT
Stripe Bike Lane	Per mile	71 VMT
Install Bus Shelter	Per each	50 VMT
Install Pedestrian Countdown Timers	Per Intersection	60 VMT
Install High Visibility Crosswalks	Per 4 Legs	60 VMT
Install Curb Ramps	Per Corner	8 VMT



CITY *of* ESCONDIDO

STAFF REPORT

If the Program is adopted, City staff will work with the project proponent to identify VMT reduction strategies designed to mitigate the VMT impact of each project as a part of the Traffic Impact Analysis review process. The identified strategies will be included as mitigation measures that would be conditioned to be completed prior to the impact, generally prior to issuance of building permits. VMT reduction strategies implemented would be tracked and included in the annual Climate Action Plan report.

Staff presented the draft VMT Exchange Program to various organizations to receive input. The organizations included the Sierra Club, Bike Coalition, SD350, the Building Industry Association (BIA), and various industry consultants who do regularly prepare Traffic Impact Analysis. Feedback received has been incorporated into the Program.

On July 14, 2022, the Transportation and Community Safety Commission (TCSC) received an update on the VMT Exchange Program, which included details of the components and the project list. The TCSC voted unanimously to recommend approval of the VMT Exchange Program document.

RESOLUTION

- a. Resolution No. 2022-162
- b. Resolution 2022-162 Exhibit A: "Findings of Fact"
- c. Resolution No. 2022-162 Exhibit B: "Initial Study and Negative Declaration"
- d. Resolution No. 2022-162 Exhibit C: "VMT Exchange Program"