

# City of Rancho Cordova Transportation Impact Guidelines

June 2, 2020

# City of Rancho Cordova Transportation Impact Guidelines

## Overview

As a result of Senate Bill (SB) 743, an update was needed in the City's transportation evaluation of land development projects to address the required shift from a level of service (LOS) analysis to a vehicle miles travelled (VMT) analysis for CEQA transportation impacts. These guidelines described the CEQA analysis for transportation impacts that shall be used in the City of Rancho Cordova and are organized in this document's five sections as follows:

- Section 1. Project Description:** Information to be supplied by the applicant necessary to determine study requirements including screening analysis.
- Section 2. Screening Criteria:** Screening criteria for land use and transportation projects is provided to determine whether VMT analysis is required.
- Section 3. Significance Thresholds:** Significance thresholds define what constitutes an acceptable level of VMT and what requires mitigation measures. Significance thresholds for other transportation CEQA impacts, such as safety-related impacts are also described.
- Section 4. Analysis Methodology:** These are analysis procedures for evaluating VMT for land use projects
- Section 5. Mitigation:** Projects that are found to have a significant impact based on the City's significance thresholds are required to implement mitigation measures to reduce impacts to a less than significant level (or to the extent feasible). General guidance is provided on appropriate types of mitigation

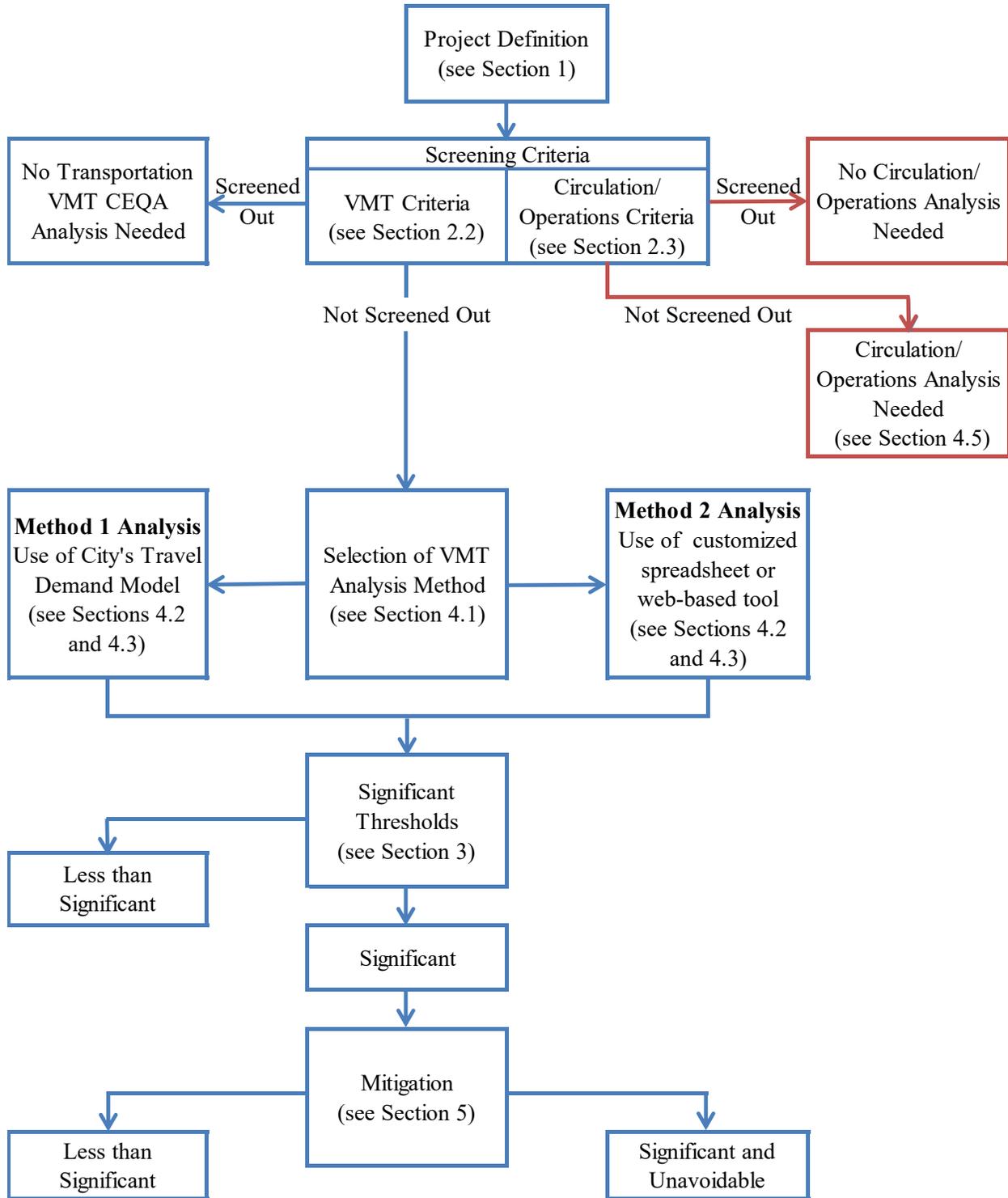
Appendices to the report provide the following:

- A. The categorization of land use types for the VMT analysis
- B. Evidence for the significance thresholds and screening criteria
- C. Transportation project screening criteria

**Figure 1** is a flowchart that provides an overview of how to determine transportation study requirements for a development project.

While these guidelines focus on the analysis needed to determine CEQA transportation impacts, the City also requires that land development projects evaluate the operations of the multi-modal circulation system serving the project to meet General Plan policies, unless the project meets the City's screening criteria for an operations analysis. A brief discussion of those screening criteria for the operations analysis is provided in Section 2.3. References to the City's circulation/operations analysis guidelines are provided in Section 4.5

**Figure 1  
Transportation Analysis Scoping  
City of Rancho Cordova**



The SB 743 legislation specified that the Governor's Office of Planning and Research (OPR) prepare guidelines for the implementation of SB 743. At the time of preparation of these transportation impact guidelines, guidance regarding the changes to CEQA initiated by SB 743 was contained in the following documents:

- CEQA Guidelines Revisions: Revisions to the CEQA Guidelines were adopted into CEQA in December 2018 through a formal process conducted by the Natural Resources Agency. Additional changes can only be made through a future CEQA update process.
- Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR's Technical Advisory) released in December 2018.

While OPR's Technical Advisory provides recommendations on many aspects of conducting a CEQA transportation analysis using VMT, OPR's guidance is not comprehensive and some key decisions are left for lead agencies to determine. The City of Rancho Cordova's Transportation Impact Guidelines, described in the following sections, were informed by OPR's Technical Advisory but were adjusted based on local data and the specific context of the City's existing and planned development and transportation system.

The change to VMT as the basis for transportation impacts is new to all jurisdictions and agencies in California. Thus the City recognizes that these guidelines will be refined over time to reflect new data and information from public and private stakeholders.

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Appendix A: VMT Analysis Land Use Designations

Appendix B: Evidence for Significance Thresholds and Screening Criteria

Appendix C: Transportation Project Screening Criteria

## 1. Project Description

As part of the City's typical process, the applicant will need to provide the following information to define the scope of the transportation analysis required for the proposed project:

- Project location map
- Zoning for site
- Description of land uses including:
  - Residential – number of single-family and multi-family units
  - Non-residential - gross floor area by type (i.e. retail, office, industrial, etc.)
- Proposed project features related to travel demand management (see Table 6 in Section 5)

## 2. Screening Criteria

### 2.1. Projects Exempt for Non-VMT Reasons

There are some non-VMT related CEQA principles that can be applied to certain projects to eliminate the need for VMT analysis. These include the following:

- The project is exempt from CEQA
- The decision required for the project is not discretionary
- The project was already analyzed in a prior certified EIR
- The City’s discretionary approval does not involve transportation issues, such as design review

The City will consider whether a project meets these or other non-VMT CEQA principles on a case-by-case basis.

### 2.2. VMT Screening

The requirements to prepare a CEQA transportation VMT analysis apply to all land development projects, except for those that meet at least one of the following VMT-related criteria in the numbered list below. Projects may be screened out of VMT impacts using project size, VMT efficiency maps, transit availability, and provision of affordable housing. A project that meets at least one of the VMT screening criteria below would have a less than significant VMT impact due to project characteristics and/or location.

1. **Residential Located in a VMT Efficient Area:** The project is a residential project located in a VMT “efficient area” (in an area with 15% or more below the base year regional average household VMT/capita) based on location-based screening maps prepared by the City using the focused version of SACOG’s SACSIM19 regional model.
2. **Office/Business Professional Employment Project Located in a VMT Efficient Area:** The project is an office/business-professional project located in a VMT “efficient area” (15% or more below the base year city-wide average VMT/employee) based on the location-based screening maps prepared by the City using its focused version of SACOG’s SACSIM19 regional model.
3. **Industrial Project Located in a VMT Efficient Area:** The project is an industrial project located in “VMT efficient area” (at or below the base year city-wide average VMT/employee) based on the adopted location-based screening map by the City using its focused version of SACOG’s SACSIM19 regional model.
4. **Proximity to Transit:** A residential, retail, and office/business professional projects, as well as projects that are a mix of these uses, that are located within ½ mile of an existing or planned major transit stop (or along a high quality transit corridor).
5. **Small Project:** The project is a small project defined as generating less than 237 daily unadjusted trips ends using the latest ITE trip generation rates/procedures or a project-specific trip generation analysis reviewed and accepted by the City

6. **Local-Serving Retail Project:** A retail (or recreational) project is local-serving if it is consistent with the land uses listed in **Appendix A** and has a gross floor area no more than the following:

- 125,000 square feet, if located within the City’s Infill Area
- 200,000 square feet, if located within the City’s Growth Area

A retail project may also be defined as local-serving if a market study demonstrates that it is based on the size of its market area. Adding retail square footage (even if it is less than the gross floor area listed above) to an existing “regional” retail shopping area is not screened out. Hotels and motels are not considered local serving retail.

7. **Locally Serving Public/Quasi-Public Facility:** The project is a locally serving public facility if it serves the surrounding community or is a public facility that is a passive use (such as communication and utility buildings, water sanitation, and waste management). Local and regional public/quasi-public facilities are listed in **Appendix A**.

8. **Affordable Housing:** The project is affordable based on the City’s criteria for affordable housing. Only the portion of the project that meets the City’s criteria is screened out. For example, if the project is 100 units with 10 affordable housing units, transportation VMT analysis would not be necessary for the 10 affordable units but would be necessary for the remaining 90 units (unless they meet one of the other screening criteria). For purposes of applying the small project screening criteria, the applicant would only include the trip generation for the non-affordable housing portion of the project (since the affordable housing portion is screened out).

9. **Mixed Use Project Screening Considerations:** The project’s individual land uses should be compared to the screening criteria above. It is possible for some of the mixed-use project’s land uses to be screened out and some to require further analysis. For purposes of applying the small project screening criteria, the applicant would only include the trip generation for portions of the project that are not screened out based on other screening criteria. For example, if a project includes residential and retail, and the retail component was screened out because it is locally serving; only the trip generation of the residential portion would be used to determine if the project meets the definition of a small project.

10. **Redevelopment Project Screening Considerations:** The project is a redevelopment project that demonstrates that the proposed project’s total project VMT is less than the existing land use’s total VMT. Exception: If a project replaces affordable housing (either deed restricted or other types of affordable housing) with a smaller number of moderate-income or high-income residential units, the project is not screened out and must analyze VMT impacts.

**Table 1** summarizes the criteria for a development project to not require a VMT analysis

### 2.3. Circulation/Operations Analysis Screening

Aside from the CEQA transportation VMT analysis, the City may require the preparation of a circulation/operations analysis for a land development project. This process is discussed in **Section 4.5**.

<b>Table 1</b>	
<b>Screening Criteria for CEQA Transportation Analysis of Development Projects</b>	
<b>Type</b>	<b>Screening Criteria</b>
Located in a VMT Efficient Area	<ul style="list-style-type: none"> <li>Residential project located in an area where VMT/Capita is 15% or more below the base year regional average</li> <li>Office/Business Professional Employment project located in an area where VMT/Employee is 15% or more below the base year city-wide average</li> <li>Industrial Employment project located in an area VMT/Employee is at or below the base year city average</li> </ul>
Small Projects	<ul style="list-style-type: none"> <li>Generates less than 237 daily unadjusted trips ends</li> </ul>
Proximity to Transit	<ul style="list-style-type: none"> <li>Located within ½ a mile of an existing or planned major transit stop or an existing stop along a high-quality transit corridor<sup>1</sup></li> </ul>
Local-Serving Retail/Recreational	<ul style="list-style-type: none"> <li>A qualifying local-serving retail/recreational use (see Appendix A)</li> <li>Infill Area: 125,000 square feet of total gross floor area or less</li> <li>Growth Area: 200,000 square feet of total gross floor area or less</li> <li>A retail project may also be defined as local-serving if a market study demonstrates that it is based on the size of its market area.</li> </ul>
Local-Serving Public Facilities	<ul style="list-style-type: none"> <li>Local-serving public facilities (see Appendix A)</li> </ul>
Affordable Housing	<ul style="list-style-type: none"> <li>100% affordable units based on City criteria</li> </ul>
Mixed Use Project	<ul style="list-style-type: none"> <li>Project's individual land uses should be compared to the screening criteria above</li> </ul>
Redevelopment Project	<ul style="list-style-type: none"> <li>Proposed project's total project VMT is less than the existing land use's total VMT</li> </ul>
<p><sup>1</sup> Major transit stop means a 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”).</p>	

A land development project that meets at least one of the following screening criteria will need to conduct a transportation circulation and operations analysis.

1. The project will generate 100 or more new a.m. or p.m. peak hour vehicle trip-ends. The project will generate 1,000 or more daily vehicle trip-ends.
2. New project traffic will substantially affect an intersection or a roadway segment already identified as operating at an unacceptable level of service.

3. The project may result in a decrease in public safety on any roadway for any mode of travel.
4. The project will substantially change the off-site transportation system or connections to it.

## **2.4. Transportation Project Screening**

OPR's technical advisory presents a list of projects that are not considered to be VMT-inducing, and therefore result in a less-than-significant impact. Project types that would not result in increased vehicle travel have a less than significant impact and can be screened out from performing VMT analysis. These types of projects include:

- New or enhanced transit, bicycle and pedestrian facilities
- Rehabilitation/maintenance projects that do not add motor vehicle capacity
- Intersection traffic signal improvements and intersection turn-lane configuration changes
- Additional capacity on local/collector streets if conditions are substantially improved for active transportation modes
- Installation of roundabouts and traffic calming devices

A full specific list of screened-out projects is shown in Appendix C, with some revisions and clarifications based on conditions specific to the City of Rancho Cordova.

Nearly all new local two-lane roadways that will be constructed in the City will be intended to provide access to new development and provide local circulation/mobility. As such, they would be assumed to be implemented with new land development projects and thus be part of the land development VMT screening and, if needed, VMT analysis. These new local roadways would not require a separate VMT analysis.

Roadway projects (or multimodal projects that include major roadways) that are included in the Circulation Element of the General Plan or an adopted Specific Plan would be presumed to have less than significant VMT impacts. In the case of some projects, a similar project may have been included in the General Plan or a Specific Plan, but revisions or refinements (e.g. a minor adjustment to alignment) have been incorporated. If the revisions or refinements are expected to cause increases in VMT, analysis should be conducted to compare the proposed project to the project description in the General Plan or Specific Plan.

### 3. Significance Thresholds

#### 3.1. Development Projects

Development projects that do not meet the screening criteria in Section 2.2 must include a detailed evaluation of the VMT produced by the project. The significance thresholds and specific VMT metric used to measure VMT are described by land use type in **Table 2**.

<b>Table 2 VMT Thresholds of Significance for Development Projects</b>	
<b>Land Use Type</b> (See Appendix A for Specific Land Use Designations)	<b>Threshold for Determination of a Significant VMT Impact<sup>1</sup></b>
Residential	15% below regional average of VMT/Capita
Office/Business Professional Employment	15% below city-wide average of VMT/Employee
Industrial Employment	City-wide average of VMT/Employee
Regional Retail	No net increase in total regional VMT
Regional Recreational	No net increase in total regional VMT
Regional Public Facilities	Does not contain regional public uses
Mixed Use	Analyze each land use individually per above categories
Redevelopment	Apply the relevant threshold based on proposed land use
Notes:	
1. Projects that exceed these thresholds would have a significant impact.	
The methods used to determine VMT/Capita and VMT/Employee for regional and city averages and total regional VMT are described in Section 4.	

#### 3.2. New Specific Plans

For new Specific Plans or other large multi-use development plans, the significance thresholds presented in **Table 2** apply as follows:

- Residential – Aggregate all residential land uses and compare the resulting VMT/Capita to the regional average. The threshold is 15% below the regional average Resident VMT/Capita per Table 1.
- Office/Business Professional Employment – Aggregate all office/business professional land uses and compare the resulting VMT/Employee to the City average. The threshold is 15% below the City average Employee VMT/Employee per Table 1.
- Industrial Employment - Aggregate all industrial employment land uses and compare the resulting VMT/Employee to the regional average. The threshold is the regional average VMT/Employee per Table 1.

- Retail, Public Facilities, and Recreational Facilities – Evaluate the effect that adding these land uses has on regional VMT.

### 3.3. Non VMT Significance Criteria

In addition to the VMT-based “thresholds of significance” listed in Table 2, a project may have a significant CEQA transportation impact if it causes one or more of the following:

- Eliminates or adversely affects an existing bikeway or pedestrian facility in a way that would discourage its use; or
- Interferes with the implementation of a planned bikeway as shown in the Bicycle Master Plan, or be in conflict with the Pedestrian Master Plan; or
- Fails to provide adequate access for bicyclists and pedestrians, resulting in unsafe conditions, including unsafe bicycle/pedestrian, bicycle/motor vehicle, or pedestrian/motor vehicle conflicts.
- Eliminates or adversely affect existing transit access, service, or operations; or
- Interferes with the implementation of planned transit service
- Substantially increases hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

### 3.4. Transportation Projects

As discussed in Section 2.4 and Appendix C there are a variety of transportation projects that are not considered to be VMT-inducing and would be presumed to have a less than significant impact on transportation. These types of projects would not require a detailed VMT analysis. For these project types, the presumption of a less than significant impact would apply even if the project was not in the General Plan or a Specific Plan.

VMT would be used as the performance measure for major roadway projects. The recommended significance threshold is the level of VMT expected based on the Specific Plan in which the transportation project is located or the City’s General Plan in other areas. This methodology is recommended for the following reasons:

- Although the new CEQA guidance allows for the use of any appropriate performance measure for the analysis of transportation projects, the intent of the SB 743 legislation was taken into consideration in the selection of a performance measure. SB 743 is intended to promote multimodal transportation networks, encourage infill development, and promote reduction of greenhouse gases. VMT is considered to be the performance measure that best reflects this intent.
- OPR’s technical advisory encourages the use of VMT as a performance measure. Although this recommendation is not binding, the intent of these guidelines is to follow OPR’s guidance, except in cases where there are regional or local factors that warrant a revision or clarification.
- The use of “consistency with the General Plan or an adopted Specific Plan” as a VMT threshold is based on the process by which transportation projects are incorporated into the General Plan or a Specific Plan. In order for a transportation project to be incorporated into a Specific Plan or the

General Plan, a considerable amount of analysis is typically conducted. Specific Plans and General Plans include the preparation of an Environmental Impact Report that considers a variety of environmental impacts, including transportation effects on vehicular travel, transit, and bicycle and pedestrian facilities impacts. Since the General Plan and adopted Specific Plans are considered to represent sound urban planning decisions, consistency with these plans is considered to be a reasonable benchmark for the determination of a VMT significance threshold.

Roadway projects (or multimodal projects that include roadways) that are included in the General Plan or an adopted Specific Plan would be presumed to have less than significant VMT impacts. In the case of some projects, a similar project may have been included in the General Plan or a Specific Plan, but revisions or refinements (e.g. a minor adjustment to alignment) have been incorporated. If the revisions or refinements are significant and expected to cause increases in VMT, analysis should be conducted to compare the proposed project to the project description in the General Plan or Specific Plan. A project that causes a significant increase in VMT, in comparison to a similar project proposed in the General Plan or Specific Plan, would need to reduce VMT levels below the level of VMT expected in the General Plan or Specific Plan in order to avoid a significant VMT impact.

Nearly all new local roadways that will be constructed in the City will be intended to provide access to new development and provide local circulation/mobility. As such, they would be assumed to be implemented with new land development projects and thus be part of the land development VMT screening and, if needed, VMT analysis. These new local roadways would not require a separate VMT analysis.

Roadway projects (or multimodal projects that include roadways) that are not included in the General Plan or an adopted Specific Plan would need a detailed analysis of VMT to determine whether the project would be expected to increase or decrease VMT as compared to VMT levels in the General Plan or Specific Plan.

The thresholds of significance for transportation projects are shown in **Table 3**.

<b>Table 3 Thresholds of Significance for Transportation Projects</b>	
<b>Project Type</b>	<b>Threshold for Determination of a Significant VMT Impact<sup>1</sup></b>
Roadway project not in General Plan or adopted Specific Plan	Increase in total regional VMT
Significant change in roadway project in General Plan or adopted Specific Plan	Significant increase in VMT compared to roadway project in General Plan or adopted Specific Plan

## 4. Analysis Methodology

### 4.1. Selection of Analysis Tools for Estimating VMT

SACSIM19 is an "activity-based" model that simulates people's activities on a "typical" weekday and it tracks travel of individuals throughout the day in trip "tours." It allocates household and employment to the parcel level, which allows the model to capture smaller-scale land use changes and differences. SACSIM19 is sensitive to the local physical environment, including the presence (or absence) of pedestrian and bicycle facilities, the patterns of local street networks (e.g., grid vs. cul-de-sacs), and the density, proximity and mix of surrounding land uses (i.e. employment destinations, schools, retail, parks, etc.). SACSIM forecasts automobile, transit, bicycle, and walk trips. SACSIM19 requires a detailed definition of household population/demographics and employment by type at a parcel-level of geography.

The VMT, VMT/Capita and VMT/Employee for regional and city averages, as well as for project-level analysis, will be determined using the City's adopted travel demand model, which is a focused version of SACOG's adopted SACSIM19 regional model. To develop the City's focused model, additional traffic analysis zones (TAZs) were added to the regional travel demand model to support traffic forecasts on additional City roadways than the major roadways in SACOG's regional model. However, the structure of the SACSIM19 regional travel demand model was not changed in the City's model. While the City's model is intended to focus on travel within the City, it covers the same area as SACSIM19 – the full six-county SACOG region. Thus the City's model predicts how the City's development interacts with land uses region-wide and the entire regional transportation system.

As part of the "SB 743 Implementation Tools Project," SACOG has two recommended methods for project-level VMT estimation:

**Method 1:** Use of a "regional" transportation model, either by running the model directly to estimate VMT with and without the project (for large projects) or through use of screening methodologies (for small projects). The transportation model used for VMT estimation could either be the SACOG regional model (SACSIM19) or one of the many variants of the regional model developed by local agencies to provide more detailed analysis within their jurisdictions. If one of the local models is used, it should be sufficiently documented and maintained.

**Method 2:** Use of a customized spreadsheet or web-based tool for a specific study area or jurisdiction that uses information from a regional transportation model to provide VMT analysis.

For land development projects in the City of Rancho Cordova, the following methods should be used:

- Method 1 above (use of a regional travel demand model) should be used for all "large" projects or other projects that meet any of the checklist criteria outlined in **Table 4**. For the purposes of the selection of methods for VMT analysis, the City has defined "large" projects as those that generate more than 3,500 daily trip ends, which is equivalent to about 350 single family dwelling units or about 300,000 square feet of office. The City has determined that this level of development is reasonable for requiring use of a regional travel demand model.

- Method 1 or Method 2 (use of a customized spreadsheet or web-based tool) can be used for the analysis of projects that do not exceed the criteria in Table 4.

Methods 1 and 2 for City’s CEQA transportation impact analysis are described in Section 4.3.

<b>Checkif Applicable</b>	<b>Project Characteristic</b>
	Project with greater than 3,500 daily vehicle trip ends
	Project is inconsistent with General Plan
	Base year trip length information from the City’s travel demand model is not available for the project (or adjacent) TAZ
	Project has unusual characteristics that VMT screening tools can't take into account <sup>2</sup>
	Project has both land development and a significant transportation component
	Project includes regional retail development
Notes:	
<ol style="list-style-type: none"> <li>1. A model run of the City’s travel demand model is recommended if a project is not screened-out based on the Section 2 criteria and any of the project characteristics listed above are applicable.</li> <li>2. Examples of unusual characteristics include some entertainment, recreational or other projects that may have longer or shorter trip lengths than a typical project of its type as well as projects that affect the trip-making behavior of the surrounding area such that VMT increases or decrease would result from nearby land uses.</li> </ol>	

#### 4.2. VMT Metrics –Development Projects

This section describes how each of the key metrics (VMT/Capita and VMT/Employee) used in the VMT analysis for CEQA transportation impacts should be calculated.

##### VMT/Capita

VMT/Capita is used to evaluate residential projects. It includes all vehicle “tours” (both work/commute vehicle tours and non-work vehicle tours) that start and end at residential units. The VMT from these tours are grouped and summed to the home location of those tours. The VMT for each home is then summed for all homes in a particular area and divided by the total population of that area to arrive at VMT/Capita.

SACSIM19 is a “tour-based” travel demand model. The vehicle tours estimated by SACSIM19 that begin and end at home include intermediate stops. For example, a work/commute vehicle tour could include stops on the way to work to drop a child at school and get coffee and a stop on the way home to go to a gym or get groceries. A non-work vehicle tour that begins and ends a home can also include more than one stop. The VMT from these tours must include the full mileage of the entire round-trip tour including

all stops based on the City’s focused version of the SACSIM19 model – both for Method 1 or Method 2 described above.

Tours made by a household resident that do not begin or end at home (called “business tours”) are not included in the VMT/Capita estimates. Such tours that begin and end at a work site can include trips for lunch or personal business but also job-related tours, such as deliveries, business meetings etc. These “business tours” are not included for the following reasons:

- The amount of business tours made by individuals can vary more based on their job type than their residential location. In the regional model, the number and length of those tours can vary greatly.
- Including business tours would require that all projects, including small to medium size residential projects, be evaluated using SACSIM19. Excluding business tours from VMT/Capita allows use of Method 2 described above. Such methods can involve use of typical ITE-based trip generation estimates (adjusted for relevant factors) along with full tour lengths from SACSIM19 that can be provided by the City for traffic analysis zone (TAZ).
- The trip generation aspect of the selected method is equivalent to use of only “home-based trips,” which is recommended by the OPR Technical Advisory when the regional model is “trip-based”. However, by using the full length of home-based tours from SACSIM19, the selected method provides a more accurate estimate of VMT

### **VMT/Employee**

VMT/Employee is used to evaluate office and industrial employment projects. It includes all work/commute vehicle tours that start and end at employment location (“parcels” in SACSIM19). The VMT from these tours are grouped and summed to the employment location of those tours. The VMT for each employment location is then summed for all employment locations in a particular area and divided by the total employment of that area to arrive at VMT/Employee.

As described under VMT/Capita, the work/commute vehicle tours estimated by SACSIM19 include intermediate stops. The VMT from these tours must include the full mileage of the entire round-trip work/commute tour including all stops based on the City’s focused version of the SACSIM19 model – both for Method 1 or Method 2 described above.

The selected method is equivalent to the use of only “home-based work trips,” which is recommended by the OPR Technical Advisory when the regional model is trip-based is used to estimate VMT/Employee for an office project.

### **4.3. Methods for Estimating VMT – Development Projects**

Project-level VMT analysis for Method 1 should use the City’s adopted travel demand model, which is a focused version of SACOG’s adopted SACSIM19 regional model. The specific model version and model year will be identified by the City’s Public Works Department. Method 2 should use “tour distances” from the City’s adopted travel demand model.

The City can provide the following information:

- Base year screening maps that display VMT/Capita and VMT/Employee as a percent the regional and City averages, respectfully
- Input files and model run scripts for the base year version of the City’s adopted travel demand model.
- Model scripts that can be used with the City’s travel demand model to estimate VMT/Capita and VMT/Employee for project-level analysis by Method 1
- Maps with base year average distances for home-based vehicle tours by traffic analysis zone (TAZ) for the evaluation of VMT/Capita of residential projects by Method 2
- Maps with base year average distances for work/commute vehicle tours by TAZ for the evaluation of VMT/Employee for office and industrial employment projects by Method 2

The City will not provide the software for SACSIM19 or manuals on how to use this software.

### **Method 1 Analysis**

Method 1 is required for “large” projects (those that generate more than 3,500 daily trip ends) or other projects that meet any of the checklist criteria outlined in **Table 4**. However, Method 1 can be used for any size project that requires a VMT analysis. This method involves the following basic steps:

- Input all project land uses into the base year version to City’s adopted travel demand model.
- Any edits to the model’s network must be fully described and should only be made at the project site to 1) ensure that site access for the proposed project is properly represented in the model and 2) any changes in roadways, bikeways or transit networks that are part the proposed project are reflected.
- SACSIM19 requires that “buffers” be estimated for each parcel. Buffers identify the mix of land uses and transit stops that are near that parcel. Due to the change in land use caused by the project, the base year buffers need to be re-estimated for parcels that are within one-half mile of the project. The model’s buffer input files need to be edited for those parcels. Buffers for parcels further than one-half mile from the project site should remain the same.
- The model needs to be run with the new model input files (for land use, buffers and networks) using the same model run scripts as the base year version of the City’s adopted travel demand model.
- VMT/Capita and VMT/Employee should be determined using the same method/scripts utilized by the City to develop the City’s VMT/Capita and VMT/Employee screening maps.
- If a significant transportation VMT impact is identified, some types of mitigation measures can be reflected in SACSIM19, which allows the model to be rerun to determine if these measures reduce the level of impact. However, some types of travel demand management (TDM) measures cannot be fully reflected in SACSIM19, and a customized spreadsheet or web-based tool should be used to test the effectiveness of those measures at reducing project VMT. See Section 5 for analysis of mitigation measures.

SACOG’s current base year is 2016, which was used for the 2020 MTP/SCS. To meet Federal requirement, SACOG will update their model every four years when they develop and approve a new

Metropolitan Transportation Plan/Sustainable Community Strategy (MTP/SCS). As part of that process they will update both the land use and the transportation system inputs to the model for a new base year. The City can use SACOG's data for a new base year to prepare new estimates of regional and Citywide VMT/Capita and VMT/Employee to monitor the City's progress on these key metrics.

### **Method 2 Analysis**

Method 2 can be used for projects that generate less than 3,500 daily unadjusted trip ends unless they meet the any of the other checklist criteria outlined in **Table 4**. This method generally involves the use of:

- Typical trip generation methods, such as ITE vehicle trip generation rates that may be adjusted based on supporting information
- A customized spreadsheet or web-based tool that uses trip length information from the City's travel demand model to provide VMT analysis

The selected tool used under Method 2 must demonstrate that it is appropriate for VMT analysis. That is, the tool must be able to provide direct estimates of "project generated VMT" and must:

- have been vetted by independent researchers, including its accuracy, sensitivity and defensibility
- be capable of using trip/tour length estimates from the City's travel demand model that reflects the specific project location

Ideally, the selected tool will also be able to evaluate travel demand management (TDM) strategies for VMT mitigation.

VMT generation is highly dependent on the location of a project site with respect to the availability of alternative transportation modes and its location with respect to origins and destinations of trips within the regional area. Average vehicle trip length, which is an important component of VMT, is highly influenced by these factors. Travel demand models are developed to take these factors into account and are widely accepted for analysis of these and other factors related to trip-making behavior. Customized spreadsheet and web-based methodologies are able to account for these factors by importing trip length information from the regional travel demand model on a localized basis.

There are a large number of customized methodologies that have been made available by various developers that have been prepared for general use and are not specifically tailored to an individual location or jurisdiction. A list of models was included in the 2014 SB 743 guidelines prepared by the Office of Planning and Research (Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing SB 743, OPR, 2014). The project team has reviewed these customized methodologies and has not discovered a tool that is validated and become widely accepted for VMT analysis of individual projects. The level of documentation that is available for different methodologies varies and the level of maintenance of the methodologies is also an unknown going forward. Wide variations in the VMT results between different methodologies adds to the uncertainty regarding their use

SACOG's "SB 743 Implementation Tools" project evaluated eleven sketch model tools. They also incorporated information from reviews conducted through academic research by UC Davis and UC Berkeley. Eight of the eleven tools were not recommended for use as a sketch tool for VMT analysis.

If Method 2 is selected, the City needs to approve a tool or spreadsheet methodology based on supporting information.

#### **4.4. Method for Estimating VMT – Transportation Projects**

Like development projects, there are two methods to analyze VMT impacts of roadway projects (or multimodal projects that include roadways) that are not “screened out” and thus need a detailed analysis of VMT.

- For small transportation projects, the VMT analysis could be conducted using sketch planning techniques. Small projects would be those where significant changes in travel patterns that would cause “induced” travel.
- For medium or large projects, the analysis would require the use of the City’s focused version of the SACSIM model. Effects of induced travel are accounted for, as the SACSIM model estimates changes in origins/destinations, travel modes and travel routes in iterative model runs to reach a final traffic forecast. The SACSIM model is sensitive to changes in congested travel times by auto based on roadway capacity and estimated volumes, as well as the changes in travel times of alternative modes (walking, biking and transit) for all possible origin/destination pairs in the region.

#### **4.5. Circulation/Operations Analysis**

Aside from the CEQA transportation VMT analysis, the City may require the preparation of a circulation/operations analysis for a land development project (see Sections 2.3 for need to conduct this analysis). The purpose of this analysis is to forecast, analyze, and describe how a development will affect existing and future circulation infrastructure for all users of the transportation system, including vehicles, bicycles, pedestrians and transit. The circulation/operations analysis assists transportation engineers and planners in both the City and the development community when making land use, infrastructure planning, and other development decisions. This analysis quantifies the expected changes in transportation conditions and evaluates the efficacy of potential improvements, if warranted.

The circulation/operations analysis, which includes a traditional LOS-based traffic impacts of development projects, is separate from the transportation impact analysis conducted as part of the environmental (CEQA) project review process, as described in Sections 4.1 through 4.3. The purpose of the circulation/operations analysis is to ensure that all projects provide a fair share of infrastructure improvements in order to accommodate their multimodal transportation demands.

The detailed methodologies for the circulation/operations analysis are covered in separate documentation. The City currently uses Sacramento County’s 2004 Traffic Impact Analysis Guidelines to define the methodologies for the circulation/operations analysis. Sacramento County is updating those guidelines to both implement the requirements of SB 743 and reflect their desired changes in their “local transportation analysis” (LTA), which focuses on the more traditional LOS-based transportation impacts of development projects. The County’s new LTA guidelines include defining any multimodal transportation improvements (transit, bicycle, pedestrian) that are recommended to support a land development project, but may or may not be required as CEQA mitigation measures for a project’s significant VMT impacts.

## 5. Mitigation

If a project is found to have a significant transportation VMT impact, it must identify feasible mitigation measures that could avoid or substantially reduce that impact. Depending on the project type, this means reducing the project's VMT, VMT/Capita and/or VMT/Employee. Typically, these VMT metrics are reduced by implementing strategies that achieve one of the following:

- Reducing the number of automobile trips generated by the project or by the residents or employees of the project.
- Reducing the distance that people drive.

**Table 5** summarizes the type of VMT deduction strategies that could be considered for mitigating a significant transportation VMT impact. Strategies that reduce single occupant automobile trips or reduce travel distances are called TDM strategies. The City has used its "Transit Related Services Special Tax" to provide vehicle trip reduction services, including transit shuttle services.

Not all mitigation measures are physical improvements to the transportation network. A sample mitigation measure might include telework options for employees to reduce vehicular travel. Examples of other mitigation measures based on OPR's Technical Advisory are shown in **Table 6**.

An analysis with supporting evidence must demonstrate the effectiveness of the proposed mitigation measure(s) at reducing the identified significant transportation VMT impact (i.e. reducing VMT/Capita, VMT/Employee and/or total VMT).

<b>Table 5 VMT Reduction Strategies</b>			
<b>Strategy Type</b>		<b>Description</b>	<b>Notes</b>
A	Land Use/ Location	Land use-related components such as project density, location, and efficiency related to other housing and jobs; and diversity of uses within the project. Also includes access and proximity to destinations, transit stations, and active transportation infrastructure.	Built environment strategies require modifying the project, which may create inconsistencies with the project description and financial feasibility.
B	Site Enhancement	Establishing or connecting to a pedestrian/bike network; car sharing programs; shuttle programs.	
C	Transit System Improvement	Improvements to the transit system including reach expansion, service frequency, types of transit, access to stations, station safety and quality, parking (park-and-ride) and bike access (to transit itself and parking), last-mile connections.	
D	Travel Demand Management	For residential: transit fare subsidies, education/training on alternatives, rideshare programs, shuttle programs, bike share programs For employer sites: transit fare subsidies, parking cash-outs, paid parking, alternative work schedules/telecommute, education/training of alternatives, rideshare programs, shuttle programs, bike share programs, end of trip facilities	TDM strategies are often building tenant dependent so their use requires on-going monitoring and adjusting to account for changes in building tenants and their travel behavior.
E	In-Lieu Fees/Tax	A fee or tax leveled that is used to provide transportation services that reduce trips from the project, including transit services	A potential example is the City's "Transit Related Services Special Tax"

**Table 6**  
**Example VMT Reduction Measures**

Category	Measure
Parking	<ul style="list-style-type: none"> <li>• Limit or eliminate parking supply</li> <li>• Unbundle parking costs</li> <li>• Provide parking cash-out programs</li> <li>• Price workplace parking</li> </ul>
Transit	<ul style="list-style-type: none"> <li>• Improve or increase access to transit</li> <li>• Reduce transit headways</li> <li>• Implement neighborhood shuttle</li> <li>• Provide partially or fully subsidized transit passes</li> </ul>
ITS	<ul style="list-style-type: none"> <li>• Deploy management strategies (e.g., pricing, vehicle occupancy requirements) on roadways or roadway lanes.</li> <li>• Implementing or funding intelligent transportation systems (ITS) strategies to improve passenger throughput on existing lanes.</li> </ul>
Education and Encouragement	<ul style="list-style-type: none"> <li>• Provide incentives or subsidies that increase the use of modes other than a single-occupancy vehicle</li> <li>• Voluntary travel behavior change program</li> <li>• Promotions and marketing</li> </ul>
Commute Trip Reductions	<ul style="list-style-type: none"> <li>• Implement or provide access to a commute reduction program</li> <li>• Provide telework options</li> <li>• Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, showers and locker rooms, and bicycle repair services</li> <li>• Employer or association-sponsored vanpool, circulator, or shuttle</li> <li>• Rideshare program</li> <li>• Provide employee transportation coordinators at employment sites</li> <li>• Provide a guaranteed ride home service to users of non-auto modes</li> </ul>
Shared Mobility	<ul style="list-style-type: none"> <li>• Provide car-sharing, bike sharing, and ride-sharing programs</li> <li>• Shift single occupancy vehicle trips to carpooling or vanpooling by providing ride-matching services or shuttle services</li> <li>• Other shared mobility devices</li> <li>• School carpool program</li> </ul>
Active Transportation/ Neighborhood Enhancement	<ul style="list-style-type: none"> <li>• Orient the project toward transit, bicycle, and pedestrian facilities</li> <li>• Improve pedestrian or bicycle networks</li> <li>• Include outdoor bike parking</li> <li>• Include secure bike parking and showers</li> <li>• Shared use paths/paseos</li> </ul>

**Table 6**  
**Example VMT Reduction Measures**

Category	Measure
Project Changes	<ul style="list-style-type: none"> <li>• Locate the project in an area of the region that already exhibits low VMT.</li> <li>• Locate the project near transit.</li> <li>• Increase project density.</li> <li>• Increase the mix of uses within the project or within the project's surroundings.</li> <li>• Increase connectivity and/or intersection density on the project site.</li> <li>• Increase access to common goods and services, such as groceries, schools, and daycare.</li> <li>• Incorporate affordable housing into the project.</li> <li>• Incorporate a neighborhood electric vehicle network.</li> </ul>

## Appendix A

### VMT Analysis Land Use Designations

For the purpose of defining the type of VMT analysis that is required for CEQA transportation impacts, the land use designations that fit within residential, office/business professional employment, industrial employment, local-serving retail and local-serving public facilities categories are provided in **Table A-1** below.

<b>Table A-1</b>
<b>Land Use Designations for VMT Analysis</b>
<b>Residential</b>
Estate Residential (ER)
Low Density Residential (LD/LDR)
Low Density Cluster (LDC)
Medium Density Residential (MD/MDR)
High Density Residential (HDR)
Residential Mixed-Use (RMU) – residential prominent use
Residential Mobile Home (RMH)
Retirement/age-restricted housing
Residential care home/facility
<b>Office/Business Professional Employment</b>
Business and Profession Office (BP)
Office Profession Mixed Use (OPMU) - office predominant use
Office Industrial Mixed Use (OIMU)
Hospital
<b>Industrial Employment</b>
Light Industrial (LI)
Light Industrial Business Park (LIBP)
Industrial Park (MP)
Light Industrial/Manufacturing (M-1)
Heavy Industrial/Manufacturing (M-2)
<b>Retail (includes recreational uses):</b> May be screened out as local-serving based on size or market study.
General Commercial (GC) that do not include regional uses
Commercial Mixed-Use (CMU) – commercial prominent use
Village Commercial/Center (VC)
Village Center Mixed Use

<b>Table A-1 Land Use Designations for VMT Analysis</b>
<b>Regional Retail and Recreational – Not Local Serving</b>
General Commercial (GC) that include regional uses
Local Town Center (LTC)
Regional Town Center (RTC)
Hotels and motels
Outdoor commercial recreation
Entertainment venues
Golf course
<b>Public/Quasi-Public Facilities - Local Serving</b>
Public K-12 schools (elementary school, middle school, and high school)
Day care center
Library
Post Office
Neighborhood park
Open Space
Police and Fire stations
Utility substations
Water sanitation and waste management facilities
<b>Regional Public Facilities – Not Local Serving</b>
Airport
University/college
Community college
Private schools (elementary school, middle school, and high school)
Religious institutions
Clubs, lodges, and private meeting halls
Theaters and Auditoriums
Museum
Regional park

## **Appendix B**

### **Evidence for Thresholds and Screening Criteria**

This appendix provides context and evidence for the thresholds and screening criteria for the transportation VMT CEQA analysis.

#### **BACKGROUND**

The SB 743 legislation specified that the Governor’s Office of Planning and Research (OPR) prepare guidelines for the implementation of SB 743. During the period from the passage of SB 743 in 2013 to the fall of 2018, OPR prepared various sets of guidelines and sought public comments from stakeholders. At the time of preparation of these transportation impact guidelines, guidance regarding the changes to CEQA initiated by SB 743 was contained in the following documents:

- CEQA Guidelines Revisions: Revisions to the CEQA Guidelines were adopted into CEQA in December 2018 through a formal process conducted by the Natural Resources Agency. Additional changes can only be made through a future CEQA update process.
- Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR’s Technical Advisory) released in December 2018.

While OPR’s Technical Advisory provides recommendations on many aspects of conducting a CEQA transportation analysis using VMT, OPR’s guidance is not comprehensive and some key decisions are left for lead agencies to determine. The Technical Advisory is not formally included in CEQA and can be revised by OPR at any time without going through a formal process. Updated versions of the Technical Advisory are expected to be issued by OPR as new information becomes available and as California agencies gain experience in applying SB 743 to actual projects.

Although OPR’s Technical Advisory provides a substantial amount of information on how to conduct a VMT analysis under CEQA, additional work is needed at the local level, either through an overall guidance document or on a case-by-case basis as individual studies are conducted. The Technical Advisory provides statewide guidance based on evidence collected by OPR that can be refined or modified by local agencies with appropriate justification and substantial evidence. The Technical Advisory suggests various thresholds for the significance of VMT impacts but does not require the use of a particular threshold. Lead agencies have discretion to select their preferred significance thresholds and could choose to use the thresholds suggested in the Technical Advisory or develop alternative thresholds.

The City of Rancho Cordova’s Transportation Impact Guidelines, described in the following sections, were informed by OPR’s Technical Advisory but were adjusted based on local data and the specific context of the City’s existing and planned development and transportation system. The City’s guidelines were also informed by the Sacramento Area Council of Government’s (SACOG) “SB 743 Implementation Tools” project. The intent of SACOG’s effort was to provide tools and information for agencies in the SACOG region to implement SB 743 within their own jurisdiction. That project was conducted with the assistance of a Local Agency Working Group (LAWG) set up by SACOG that consisted of staff members of agencies within the SACOG region, including the City of Rancho Cordova.

## THRESHOLDS OF SIGNIFICANCE

A land development project's CEQA transportation impacts impact would be significant if it exceeds any of the thresholds below. Evidence is provided for each threshold.

### Residential Projects

Threshold – If a residential development is located in an area where household VMT per capita is less than 85 percent of the regional average, the project is presumed to result in a less than significant CEQA impact.

Evidence – The OPR Technical Advisory provides that “residential development that would generate vehicle travel that is 15 or more percent below the existing residential VMT/Capita, measured against the region or city, may indicate a less-than-significant transportation impact.”

### Office Employment Projects

Threshold – If an office employment development is located in an area where VMT/Employee is less than 85 percent of the city-wide average, the project is presumed to result in a less than significant CEQA impact.

Evidence – Like downtown Sacramento, the Infill Area of the City of Rancho Cordova is a major employment center for the Sacramento metropolitan area. The City's jobs/housing ratio (2.15) is nearly double the regional jobs/housing ratio (1.15). Thus the City currently imports most of its workers and the current city average for VMT/Employee (18.9) is 15 percent higher than the regional average for VMT/Employee (18.9). Setting a VMT/Employee threshold at 85% of the current regional average would result in significant impacts for office projects anywhere they are located within the City.

However, SACOG's regional travel demand model estimates that Rancho Cordova's VMT/Employee will decrease by about 14% (to 16.4) by 2040 with the future land use and transportation system anticipated in the 2020 MTP/SCS. The reasons for this projected decrease in the city average VMT/Employee are:

- The MTP/SCS projects substantially higher growth in residential development than employment growth within the City, which will decrease the jobs/housing ratio from 2.15 to 1.8
- The MTP/SCS included significant improvements in transit (light rail and bus) services to the City's already robust transit accessibility.

For the above reasons, an appropriate threshold for office projects within the City is 85% below the current city-wide average for VMT/Employee. This threshold is consistent with achieving an overall reduction in citywide VMT as it recognizes that the City is already a regional employment center.

### Industrial Employment Projects

Threshold – If an industrial employment development is located in an area where the VMT per employee is less than 100 percent of the city-wide average, the project is presumed to result in a less than significant CEQA impact.

Evidence – The OPR Technical Advisory provides that “land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends the quantified thresholds described above for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types.”

Purely industrial uses are desired to be located in locations that are less dense and not within urban areas which typically have higher VMT/Employee. Industrial land uses are land intensive; therefore, placing industrial land uses in less urban areas characterized by having higher VMT/Employee allows land in efficient VMT areas to be more effectively utilized as high density residential and commercial uses.

As discussed under the evidence provided for VMT/Employee threshold for office projects, Rancho Cordova is already a regional employment center with a higher average VMT/Employee than the regional average. Yet the city average VMT/Employee is projected to decrease by about 40% by 2040 with the future land use and transportation system anticipated in the 2020 MTP/SCS. Thus, an appropriate threshold for industrial projects within the City is the current city average for VMT/Employee. This threshold is consistent with achieving an overall reduction in citywide VMT as it recognizes that:

- The City is already a regional employment center
- Industrial uses, which generate lower total VMT per acre are most appropriate in areas that have a lower potential to reduce VMT because it results in more available land within areas with a high potential to achieve VMT reductions available for more dense residential and office development.

### **Regional Retail**

Threshold – If a regional retail project would not cause a net increase in total regional VMT, the project is presumed to result in a less than significant CEQA impact.

Evidence – The OPR Technical Advisory provides that “because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts...Regional-serving retail development,... which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than- significant.”

Retail within the City will be analyzed consistent with the OPR technical advisory.

### **SCREENING CRITERIA**

Development projects are presumed to have less than significant impacts to the transportation system, and therefore would not be required to conduct a VMT analysis, if any of the following criteria are established, based on substantial evidence.

#### **Located in a VMT Efficient Area:**

Criteria – If a project is located in VMT Efficient Area, the project is presumed to result in a less than significant CEQA impact. VMT Efficient Areas are defined by the thresholds of significance as follows:

- Residential project located in an area where VMT/Capita is 15% or more below the base year regional average
- Office employment project located in an area where VMT/Employee is 15% or more below the base year city-wide average
- Industrial employment project located in an area where VMT/Employee is at or below the base year city-wide average

The City has prepared separate maps showing the VMT Efficient Areas for residential, office employment and industrial employment developments that can be used for project screening.

Evidence – This presumption is consistent with the Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018) (OPR Technical Advisory), which provides that “residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Maps created with data from a travel survey or travel demand model can illustrate areas that are currently below threshold. Because new development in such locations would likely result in a similar level of VMT, such maps can be used to screen out residential and office projects from needing to prepare a detailed VMT analysis.”

### **Proximity to Transit:**

If a residential, retail, or office/business professional project, as well as projects that are a mix of these uses, are located in a Transit Priority Area (within ½ mile of an existing or planned major transit stop or along a high quality transit corridor) the project is presumed to result in a less than significant CEQA impact.

Evidence – Proposed CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ 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. Pub. Resources Code, § 21064.3 states that “‘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.”

### **Small Projects**

In addition, small projects, which are whole projects with independent utility that would generate less than 237 average daily vehicle trips (ADT), would also not result in significant VMT impacts on the transportation system:

Evidence – The OPR Technical Advisory states that “projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant impact.” This is supported by the fact that CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development, and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301(e)(2).)

SACOG used the OPR 110 trips per day estimate and the California Household Travel Survey (CHTS) average trip length for offices in the SACOG region (7.9 miles), which results in a VMT generation of 869 VMT/day. A VMT of 836/day equates to approximately 20 single-family residential units based on a value of 42.9 VMT/household in the CHTS for the SACOG region. Based on the ITE Trip Generation Manual (10th Edition), 20 single-family homes would generate 237 daily trips, using the fitted curve methodology

### **Local Serving Retail/Recreational**

A retail (or recreational) project is locally serving if it is consistent with the land uses listed in **Appendix A** and has:

- Infill Area: 125,000 square feet gross floor area or less
- Growth Area: 200,000 square feet gross floor area or less

A retail project may also be defined as local-serving if a market area study demonstrates that it is based on the size of its market area. Hotels and motels are not considered local serving retail.

Evidence – The OPR Technical Advisory provides that “because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts.” Local serving retail generally shortens trips as longer trips from regional retail (or from neighborhood retail centers that are further away) are redistributed to the new local retail.

The International Council of Shopping Centers (ICSC) conducts research on shopping centers and classifies centers based on its characteristics. They describe a “neighborhood center” as having between 30,000 to 125,000 square feet of gross floor area with a market area of 3 miles. Thus, new shopping centers with 125,000 square feet or less should be considered local-serving. Adding retail square footage (even if it is less than the gross floor area listed above) to an existing regional retail shopping area is not considered local-serving

The City’s Growth Area is very different than its Infill Area on how retail development will impact VMT. The Infill Area is currently served by retail that is close to residential development while the Growth Area is currently largely residential and under-served by retail uses. The following can be said about future development in the Growth area based on the City’s General Plan and adopted specific plans:

- A substantial amount of residential development will result that will help reduce the City’s high overall job/housing ratio and thereby substantially lower the city-wide average VMT/Employee
- An adequate amount of neighborhood retail centers is planned to serve the new residential areas and thereby limit VMT/Capita.

It is anticipated that while adequate land is zoned in the Growth Area for retail uses, their development will continue to lag behind residential uses in the Growth Area. Thus retail development in the Growth Area must be encouraged to limit growth in VMT/Capita for residential uses. While shopping centers greater 125,000 square feet in the Infill Area may be considered as regional centers, somewhat larger

neighborhood centers (up to 200,000 square feet) can be allowed in the Growth Area without significant increases to overall VMT if they do not include regional uses, such as an entertainment venue. A retail project may also be defined as local-serving if a market area study demonstrates that it is based on the size of its market area.

### **Local Serving Public Facilities**

Public facilities that serve the community and either produce very low VMT or divert existing trips from established local facilities. A replacement of an existing facility with facility of similar size and use is exempt under CEQA so not subject to VMT analysis.

Evidence – Similar to local serving retail, local serving public facilities would redistribute trips and would not create new trips. Thus, similar to local serving retail, trips are generally shortened as longer trips from a regional facility are redistributed to the local serving public facility.

### **Affordable Housing**

Residents of affordable residential projects typically generate less VMT than residents in market rate residential projects. This pattern is particularly evident in affordable residential projects near transit. In recognition of this effect, and in accordance with the OPR Technical Advisory, projects that meet the City's criteria for affordable housing would not require a VMT analysis.

Evidence – Affordable residential projects generate fewer trips than market rate residential projects. Thus the OPR Technical Advisory recommends that such projects would not require a VMT analysis.

### **Redevelopment Project**

Projects that replace existing uses with similar use and size are exempt from CEQA and VMT analysis. If a project replaces an existing use with a different use or is a significantly larger facility with same use as existing it would not require to complete a VMT analysis if demonstrates that the total project VMT is less than the existing land use's total VMT.

Evidence – Consistent with the OPR Technical Advisory, “where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply.”

If a residential or office project leads to a net increase in VMT, then the project's VMT per capita (residential) or per employee (office) should be compared to thresholds recommended above. Per capita and per employee VMT are efficiency metrics, and, as such, apply only to the proposed project without regard to the VMT generated by the previously existing land use.

If the project leads to a net increase in provision of locally-serving retail, transportation impacts from the retail portion of the development should be presumed to be less than significant. If the project consists of regionally-serving retail, and increases overall VMT compared to with existing uses, then the project would lead to a significant transportation impact. – OPR Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018).

## **Appendix C**

### **Transportation Project Screening Criteria**

This appendix provides a list of transportation projects that are presumed to have a less than significant impact, and therefore, would not be required to conduct VMT analysis.

The following specific project types are presumed to have a less than significant impact to VMT:

- 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 two miles in length
- Installation, removal, or reconfiguration of traffic lanes at intersections that are intended to provide operational or safety improvements
- 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 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
- Roadway striping modifications that don't change the number of vehicle through lanes
- Projects to bring an intersection or roadway into conformity with City design standards
- Installation, removal, or reconfiguration of auxiliary through lanes (i.e. with a downstream lane drop) at intersections that are intended to provide operational or safety improvements