



City of Sebastopol Planning Commission Staff Report

Meeting Date: February 27, 2024
Agenda Item: 6A
To: Planning Commission
From: Kari Svanstrom, Planning Director
John Jay, Associate Planner
Ian Barnes, Fehr & Peers
Subject: Adoption of Resolution Recommending City Council Adopt the Vehicle-Miles Traveled (VMT) Thresholds
Recommendation: Adopt the Resolution

Introduction:

On February 13, 2024, the Planning Commission reviewed the proposed draft Final Memo for the Vehicle-Miles Traveled (VMT) Thresholds in accordance with Senate Bill SB 743. After hearing a staff report, a presentation, and public comment, the Commission deliberated and voted to request that staff prepare a Resolution recommending the City Council adopt the VMT thresholds, with minor corrections to the draft memo. Those modifications have been made, and a resolution is now presented to the Commission for adoption.

The February 13th, 2024, staff report, which includes background and discussion, is attached to this report, as is the proposed Resolution and final draft VMT memo.

Public Comment:

No public comments have been received as of the writing of this staff report.

Recommendation:

Adopt the memo.

Attachments:

Draft Resolution
Draft Final Memo

Prior meeting materials are available at:

<https://www.cityofsebastopol.gov/events/planning-commission-meeting-february-13-2024/>
<https://www.cityofsebastopol.gov/events/planning-commission-meeting-july-25-2023/>

RESOLUTION NO. 24-01

RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SEBASTOPOL
RECOMMENDING THE CITY COUNCIL ADOPT THE PROPOSED VEHICLE MILES TRAVELED
(VMT) THRESHOLDS

WHEREAS, the City of Sebastopol completed a comprehensive General Plan update with adoption of a new General Plan on November 15, 2016; and

WHEREAS, pursuant to the California Environmental Quality Act (CEQA, codified at Public Resources Code § 21000 et seq.) and the State CEQA Guidelines (14 CCR, § 15000 et seq.), on November 15, 2016, the City Council certified and adopted an Environmental Impact Report (EIR) for the Sebastopol General Plan (the “Project”; State Clearinghouse No. 2016032001); and

WHEREAS, the State of California SB743, effective 2020, which shifts transportation impact metrics for the California Environmental Quality Act (CEQA) from vehicle level of service (LOS) for the purposes of the California Environmental Quality Act (CEQA); and,

WHEREAS, the project is consistent with the General Plan, in that it conforms to the following:

Goal CIR 5: Reduce Vehicle Miles Traveled (VMT) in Order to Reduce Congestion and Help Achieve Regional Efforts to Reduce Greenhouse Gas (GHG) Emissions

Policy CIR 5-1: Actively support the Regional Climate Protection Authority (RCPA) in its efforts to reduce GHG emissions and strive to meet its regional goals.

Policy CIR 5-2: Ensure that the City’s Trip Reduction Program (Municipal Code Section 8.16) is implemented. The purpose of the City’s Trip Reduction ordinance is to reduce traffic and improve air quality within the City of Sebastopol by promoting the development of Trip Reduction Programs (also referred to as Transportation Demand Management Programs, or TDM) at existing and future work sites.

Examples of TDM programs may include (but are not limited to) subsidized transit passes, guaranteed ride home, carpool matching, telecommuting, alternative work schedules, car sharing, employer-sponsored vanpools, priced workplace parking, preferential parking for carpools and/or low-emission vehicles, and shower facilities at workplaces to support bike riding.

Policy CIR 5-3: Support the establishment and expansion of a regional network of electric vehicle charging stations and encourage the expanded use of electric vehicles.

Actions in Support of Goal CIR 5

Action CIR 5a: Supply transportation data to the RCPA as requested to assist in the assessment of GHG reduction efforts.

Action CIR 5b: Establish specific TDM requirements that is consistent with the

City's Trip Reduction Program for projects and consider making requirements sector-based (e.g., residential, commercial, industrial).

Action CIR 5c: Complete surveys of employment trips as outlined in the City's Trip Reduction Program.

Action CIR 5d: Establish standards and requirements for electric vehicle parking, including the installation of electric vehicle charging stations, in new development projects. And,

WHEREAS, the Sebastopol Planning Commission held discussions of the VMT project on July 25, 2023, and the City Council held a discussion on the VMT project on September 5, 2023, and,

WHEREAS, the Planning Commission held a duly noticed public meeting on February 13, 2024, to consider the final recommended VMT thresholds, hear a staff presentation, took public comment, and after deliberating, voted 3-0-0-2 (Ayes: Chair Fernandez, Vice Chair Fritz, Commissioner Oetinger; Absent: Commissioners Burnes, Hanley) to have staff prepare a Resolution recommending the VMT thresholds to City Council for consideration at its February 27, 2024 meeting; and

WHEREAS, the Planning Commission voted to recommend the VMT thresholds at its February 27, 2024 meeting as follows (unanimously, or by role vote).

NOW, THEREFORE, THE PLANNING COMMISSION DOES HEREBY ADOPT THIS RESOLUTION recommending the City Council adopt the proposed attached Vehicle Miles Traveled (VMT) Memo, including its methodologies and thresholds for the purposes of CEQA review within the City of Sebastopol.

Approved on February 27, 2024, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

Certified: _____

Kari Svanstrom, Planning Director

Final Memorandum

Date: February 22, 2024
To: Kari Svanstrom, City of Sebastopol
From: Ashlee Takushi and Ian Barnes, PE, Fehr & Peers
Subject: **Sebastopol SB 743 Implementation: Summary of Findings and Recommendations for VMT-Based CEQA Thresholds**

WC23-4017

Introduction

This memorandum presents recommendations for implementing Senate Bill (SB) 743 in the City of Sebastopol. This memorandum is organized into the following sections:

- *Section I (Background)* – describes background information on SB 743, relevant CEQA Guidelines, and a simple definition of Vehicle-Miles of Travel (VMT).
- *Section II (VMT Metrics and Methods)* – presents information about available travel demand models and VMT estimate calculations using the Sonoma County Transportation Authority (SCTA) travel demand model.
- *Section III (Proposed VMT Thresholds of Significance for Land Use Projects)* – presents specific thresholds of significance the City may consider using when evaluating land use projects under CEQA.
- *Section IV (Proposed Screening Criteria for Land Use Projects)* – presents screening criteria the City may consider using when evaluating if a land use project can proceed without a VMT analysis for CEQA Transportation section purposes.
- *Section V (Proposed VMT Thresholds of Significance for Roadway Projects)* – presents specific thresholds of significance the City may consider using when evaluating roadway projects under CEQA, including project types that are presumed to be less-than-significant.
- *Section VI (Next Steps)* – discusses further opportunities in the implementation process that can be used to streamline development review and develop meaningful mitigation strategies.



I. Background

On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process intended to fundamentally change transportation impact analysis as part of CEQA compliance. These changes include elimination of automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. The law directed the Governor's Office of Planning and Research (OPR) to update the CEQA Guidelines to include new criteria (e.g., metrics) for determining the significance of transportation impacts.

OPR selected VMT as the transportation impact metric, recommended its application statewide, and submitted updates to the CEQA Guidelines that were certified by the Natural Resources Agency in December 2018. The requirements of SB 743 became effective statewide on July 1, 2020 – all CEQA analyses performed after this date must use VMT for the evaluation of motorized transportation impacts (unless a project can be screened out of this analysis requirement).

To help aid lead agencies with SB 743 implementation, OPR produced the [*Technical Advisory on Evaluating Transportation Impacts in CEQA*](#) (December 2018). The *Technical Advisory* helps lead agencies think about the variety of implementation questions they face with respect to shifting to a VMT metric. The guidance is not a recipe for SB 743 implementation since lead agencies must still make their own specific decisions about methodology, thresholds, and mitigation.

OPR hosted a series of webinars in Spring 2020, in which they provided verbal interpretations and clarifications of the *Technical Advisory*. Fehr & Peers regularly attends these webinars and notes these staff interpretations such that their latest guidance is reflected in memoranda such as this.

Intent of SB 743

The following two legislative intent statements are contained in the SB 743 statute:

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

These statements are important because they provide direction to OPR, lead agencies and CEQA judges. For OPR, the direction is largely about what the new metrics should achieve. For lead agencies (such as the City of Sebastopol), the direction is about expected changes in transportation analysis plus what factors to consider for significance thresholds.



SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e. the General Plan), fee programs, or on-going network operational monitoring, but these metrics will not form a determination of significant impacts under CEQA. Cities or counties can still use vehicle LOS outside of the CEQA process if they determine it is an important part of their transportation analysis process. The most common applications will likely occur for jurisdictions wanting to use vehicle LOS to size roadways in their General Plan or determine nexus relationships for their impact fee programs. Jurisdictions can also continue to condition projects to build transportation improvements through the entitlement process (i.e., conditions of approval) in a variety of ways, such as using General Plan policy consistency findings.

Relevant CEQA Guidelines

This section presents the precise language contained in the most recent CEQA guidelines pertaining to this topic.

CEQA Section 15064.3 (Determining the Significance of Transportation Impacts)

This section defines VMT as “the amount and distance of automobile travel attributable to a project”. It describes certain conditions (e.g., proximity to a transit stop) for land use projects that should be presumed to cause a less than significant transportation impact. It concludes that projects that decrease VMT compared to existing conditions should be presumed to have a less than significant transportation impact. It is noted that parts of subsection (b)(1) below do not currently apply to Sebastopol, but Section 15064.3 is provided in full below for completeness.

New Section 15064.3. Determining the Significance of Transportation Impacts.

(a) Purpose.

This section describes specific considerations for evaluating a project’s transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, “vehicle miles traveled” refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project’s effect on automobile delay shall not constitute a significant environmental impact.

(b) Criteria for Analyzing Transportation Impacts.

(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.



CEQA SECTION 15064.3, PART 4

This section states that the lead agency has the discretion to choose the most appropriate methodology for evaluating a project's VMT. Per Section 4(c), the City has been operating under the statewide regulations since July 1, 2020 when SB743 regulations went into effect.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

(c) Applicability.

The provisions of this section shall apply prospectively as described in section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.

CEQA Guidelines Section 15064.7 (Thresholds of Significance)

This section encourages public agencies to develop and publish thresholds of significance to be used in determining the significance of environmental effects. The project effort summarized in this technical memorandum is in response to Section 15064.7. Project impacts exceeding an adopted threshold of significance are required to be mitigated.

§ 15064.7. Thresholds of Significance.

(a) Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.

(b) Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence. **Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2).**



Technical Advisory on Evaluating Transportation Impacts in CEQA

The 26-page State of California Office of Planning and Research (OPR) *Technical Advisory* provides guidance for how professional planners and CEQA practitioners should approach SB 743 implementation including recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.

Page 1 of the document states the following:

- The *Technical Advisory* does not alter lead agency discretion in preparing environmental documents subject to CEQA.
- The *Technical Advisory* should not be construed as legal advice.
- OPR is not enforcing or attempting to enforce any part of the recommendations.

Given the length, technical depth, and wide range of topics addressed in the *Technical Advisory*, it is not summarized here. However, it is cited frequently in the following chapters and the full *Technical Advisory* is included at the end of this memo.

VMT 101

This subsection presents a high-level overview of what VMT is and what it is not.

1. By definition, one (1) unit of VMT is defined as one mile driven by a vehicle (regardless of the number of occupants).
2. VMT is commonly expressed as a daily value (in miles) for a typical weekday when schools are in session.
3. All VMT metrics presented in this report comprise those which are recommended by OPR for use in CEQA transportation analysis. Chapter III discusses the VMT calculations in more detail.

While VMT is a useful metric for quantifying the efficiency of a given mix of land uses and roadway network enhancements, it is not a direct measure of congestion or delay nor does it help to answer questions about operational characteristics of a road system (such as deciding whether an intersection should be controlled by a traffic signal, a roundabout, or another method). For these reasons, many cities choose to continue to use Level of Service (LOS) analysis to address operational issues (such as intersection functioning and improvements that might be needed), while using VMT analysis for environmental impact purposes.

The following link provides a brief instructional video further defining VMT:

<http://www.fehrandpeers.com/sb743/>



II. VMT Metrics and Methods

This section presents the evaluation of the candidate travel demand models for use in estimating VMT in Sebastopol, and a recommendation for the VMT metrics to be considered in CEQA transportation analysis.

Review of Candidate Travel Demand Models


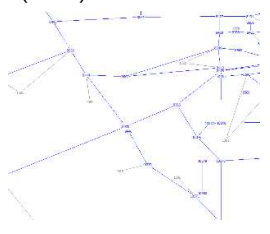

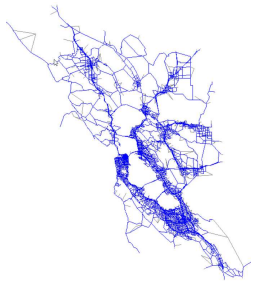
A number of travel demand models could provide estimates of VMT for land uses in the City of Sebastopol. Two of these models include the Sonoma County Transportation Authority (SCTA) countywide travel demand model, and the Metropolitan Transportation Commission's (MTC) Travel Model 1.5. These models were evaluated based on the following characteristics:

- Model structure
- Calibration year (the year reflected in the model base year land use and transportation system; model volumes are compared against traffic count data for the same year in a process called validation)
- Model detail within Sebastopol and surrounding environs, as measured by Transportation Analysis Zone (TAZ) detail and number of roadway links in Sebastopol. TAZs represent combined land use areas (e.g. neighborhoods), with boundaries typically set at major roadways.
- Model boundaries
- Level of trip truncation at model boundaries
- Model run time
- Key limitations requiring action

The results of the comparison are summarized on the next page in **Table 1**.



Table 1: Travel Demand Forecasting Model Comparison

Evaluation Criteria	SCTA Model	MTC Model
Model Structure	Trip-Based Model	Activity-Based Model
Calibration Year	2019 ¹	2015 ¹
Model Detail within Sebastopol and Surrounding Environs	High: 20 Transportation Analysis Zones (TAZs) and ~100 Links 	Low: 3 Transportation Analysis Zones (TAZs) and ~20 Links 
Model Boundaries	County of Sonoma 	Nine-County Bay Area 
Level of Sebastopol Trips Truncated at Model Boundaries	Medium: All trips leaving County of Sonoma are truncated, but trip lengths into other counties are estimated using Big Data	Low: Only trips leaving Nine-County Bay Area are truncated
Model Run Time	~30 mins	~24-32 hours
Key Limitations Requiring Action	SCTA will be updating the model to a nine-county model in the near future. City can be an active participant in the model update process.	Model sensitivity to local project land use changes is untested. Changing model inputs for land use projects requires substantial time and cost.
Recommendation	Recommended: <ul style="list-style-type: none"> - Finer model TAZ and network details - SCTA model accounts for planned development growth within agencies throughout county - Sensitive to small scale development projects - Short run time 	Not Recommended: <ul style="list-style-type: none"> - Coarse model detail in off-the-shelf version - Time consuming to make land use and transportation changes, making it costly - Long run time to analyze a project, adding to project schedule

Note 1: Models calibrated to pre-pandemic data. Post-pandemic adjustments are possible using Big Data and other traffic count information, if required.

Source: Fehr & Peers, 2020.



As noted in **Table 1**, it is recommended that the SCTA model be used to estimate VMT for projects in Sebastopol. This recommendation is made on the basis that the SCTA model has very detailed roadway network and TAZ detail in the City, the model is relatively quick to run (30 minutes versus over 24 hours for the other models), and the model provides good sensitivity to changes in local land use inputs.

The SCTA model does truncate trips at the Sonoma County limits, which should be addressed moving forward. The current method used by the SCTA model includes appending Big Data-based trip lengths at key county gateways (US 101, SR 37, SR 1, SR 121, etc.). Other methods are available to analysts that allow for the estimation of the lengths of trips outside the model boundary for appending to the VMT calculation. These methods include, but are not limited to, reviewing trip lengths from the California Statewide Model, and using site-specific Big Data trip length information. SCTA will be undertaking a model update in the next few years to upgrade the model to a nine-county model.

City staff retain discretion to require that analyses using adjustments to SCTA travel demand model data based on information in the [Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers](#) must include justification to any changes to SCTA model-prepared VMT estimates, including demonstrating that the land use and transportation system context is consistent with the underlying VMT effectiveness research.

VMT Metrics

The *Technical Advisory* notes that the VMT to be considered as part of the CEQA transportation analysis would generally take the form of an efficiency metric (i.e. VMT per capita or per employee) and be focused on VMT generated by automobiles and light duty trucks (i.e. pickup truck trips). Heavy truck trips are not required to be included in the VMT calculation, but may be included for modeling convenience. This differs from the VMT estimates historically analyzed in the Air Quality, Greenhouse Gas, and Energy analysis CEQA sections, which require a full accounting of all VMT generated (including VMT generated by heavy trucks, and other on-road vehicles).

Additionally, the VMT metrics used under SB 743 typically consist of a partial accounting of VMT which is focused on promoting a more efficient land use pattern in terms of reducing driving by residents, reducing commuting by automobile, and the efficient placement of retail and commercial establishments. These metrics include the following:

1. **Residential Projects – All Home-Based VMT per Resident:** The SCTA model is a trip-based model which captures trips on a trip-by-trip basis (versus chaining together trips made by an individual together), and therefore evaluates the VMT for all trips by residents that start or end at a dwelling unit. Thus, all residential VMT is associated with trip productions at the home (e.g., to work, to shop, to school, to recreate, etc.). Non-



home-based (NHB) trips cannot be traced back to an individual household, though NHB trips are included in the model; however, the NHB trips are not included in residential VMT calculations produced by the model. Additionally, the small proportion of home-based trips that are “attractions” (e.g., deliveries to a home, such as pizza delivery, UPS delivery, etc.) are excluded due to complexity of tracking this particular type of trip. Since the exclusion is applied for all residential uses and is linear in nature, it does not affect residential VMT efficiency.

2. **Office/Industrial (Employment-Focus) Projects – All Home-Based Work Trip (“Commute”) VMT per Employee:** This metric evaluates the VMT for all employee trips that travel between home and work for the employment locations (offices, industrial employment locations). The focus of this metric is on commute trips as being the primary component of VMT for most employment-focused land uses. Trips related to non-commute economic activity (i.e. goods deliveries, customer visits, etc.) would not be captured in this metric.
3. **Retail Projects – Total VMT:** This metric evaluates all VMT (for all trip purposes by all users associated with retail) that occurs within a geographic boundary. This metric is used for retail developments because they have a tendency to cause shoppers to shift their existing travel patterns, and in some cases (e.g. a new supermarket in a food desert) could actually cause trips to shorten and thereby result in a net decrease in area-wide VMT.

These metrics have been selected by most agencies throughout California that have completed their SB 743 implementation process.



III. Proposed VMT Thresholds of Significance for Land Use Projects

This section presents the thresholds of significance pertaining to VMT that Sebastopol will apply when analyzing the transportation impacts of land use projects under CEQA. While VMT is one of the metrics required to be included in the CEQA transportation section per SB 743, analyses of a land use project's impacts on bicycle/pedestrian facilities, transit, construction, emergency access, nonstandard design features, etc. are still expected. It is noted that the VMT-based CEQA transportation thresholds below rely on a partial VMT metric that does not require the inclusion of heavy vehicle trips (consistent with guidance from OPR); heavy vehicle trips may be included in the calculations for modeling convenience. Other CEQA topics (e.g. Air Quality, Greenhouse Gases, etc.) require a more complete accounting of VMT that includes the full spectrum of on-road vehicle trips, including heavy vehicles. Baseline VMT is established at the time of issuance of the Notice of Preparation or similar start point of environmental analysis for a project, subject to City staff discretion. The base year of the SCTA travel demand model shall not be used as Baseline unless the base year matches the year of Notice of Preparation or starting point of environmental analysis.

Page 10 of the OPR *Technical Advisory* states that OPR recommends that a per capita or per employee VMT that is 15 percent below that of existing residential and employment-focused development may be a reasonable threshold. The CEQA Guidelines note that Lead Agencies may choose to use evidence from other agencies in the development and adoption of thresholds of significance, thus the City of Sebastopol has concluded that this threshold should be applied for land use projects in the City.

Proposed VMT Thresholds of Significance – Category 1: Residential Land Uses

For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory* as modified by the City (see **Section IV**), the City of Sebastopol will apply the following threshold of significance when analyzing the VMT transportation impacts of residential land use projects under CEQA.

1. The project would cause a significant transportation impact if it would generate an average home-based VMT per resident that is greater than 85 percent of the City-wide average.

The above calculations will be performed using the SCTA travel demand model for both baseline (note: not base year) and cumulative conditions.

Proposed VMT Thresholds of Significance – Category 2: Office and Industrial Land Uses

For projects that do not qualify for any of the screening opportunities presented in the OPR *Technical Advisory* as modified by the City (see **Section IV**), the City of Sebastopol will apply the



following thresholds of significance when analyzing the VMT transportation impacts of office and industrial (employment-focused) land use projects under CEQA.

1. The project would cause a significant transportation impact if it would generate an average home-based work VMT per employee that is greater than 85 percent of the nine-county Bay Area-wide average.

The above calculations will be performed using the SCTA travel demand model for both baseline (note: not base year) and cumulative conditions.

Proposed VMT Thresholds of Significance – Category 3: Retail Land Uses

For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory* as modified by the City (see **Section IV**), the City of Sebastopol will apply the following threshold of significance when analyzing the VMT transportation impacts of retail land use projects under CEQA.

1. The project would cause a significant transportation impact if it would cause any net increase in VMT above baseline within the project's area of influence.

The above calculations will be performed using the SCTA travel demand model for both baseline (note: not base year) and cumulative conditions. The boundary selected for the project's area of influence shall be based on substantial evidence per typical CEQA practice.

Proposed VMT Thresholds of Significance – Category 4: Atypical and Mixed-Use Projects

Special consideration will be necessary to analyze VMT impacts for land uses that do not fit into the categories noted previously. Common examples include hotels, medical centers, churches, schools/colleges, specialty retail uses, etc. These uses should be analyzed on a case-by-case basis using available information and applying the general intent of the *Technical Advisory* and the residential, office/industrial and retail thresholds described previously. The latest SCTA model update resulted in the inclusion of special land uses for hotel and winery uses.

Additionally, projects that feature a mix of complementary land uses on-site should be analyzed using a technical approach geared toward the specifics of the project. The *Technical Advisory* describes two possible approaches: (1) analyze (considering internalized trips) and determine significant impacts of each project component separately under the relevant threshold, or (2) consider significant impacts based on the project's dominant land use.



IV. Proposed Screening Criteria for Land Use Projects

Screening refers to a process that is used to determine if a project needs to advance into a full VMT analysis or if a full VMT analysis is not required; generally, projects meeting screening criteria for VMT will not be required to complete a full VMT analysis (subject to staff review and approval). VMT analysis screening will differ based on the size and type of land use project.

This section presents screening criteria that may be used to determine that a particular land use project (1) may be presumed to have a less-than-significant CEQA Transportation section VMT impact, (2) no CEQA Transportation section VMT mitigation is required, and (3) no further CEQA Transportation section VMT analysis is required. It is noted that screening based on the category of development also includes the following considerations:

- Presumption of a less-than-significant impact is in itself a CEQA finding, and thus may be subject to challenge if evidence exists that the presumption is not warranted.
- City staff retain discretion to deny the use of screening on projects when the presumption may not be warranted due to the specific characteristics of the project (this applies to any CEQA review in general).
- Screening from CEQA Transportation section VMT analysis does not relieve the need to study VMT in other CEQA topic areas that use VMT as an input, such as for Air Quality, Greenhouse Gas and Energy analyses.
- Screening from CEQA Transportation section VMT analysis does not relieve the need to study City-required traffic operations and/or safety analyses that may be required as part of CEQA and non-CEQA development review procedures.

The following proposed screening criteria are based on the criteria provided in the OPR *Technical Advisory*, slightly modified based on feedback from Planning Commission on July 25, 2023 and City Council on September 5, 2023.

- **Screening for Small Projects:** Projects that generate or attract fewer than 110 trips per day. Based on research for small project triggers, this may equate to nonresidential (e.g., office) projects of 10,000 square feet or less and residential projects of 15 units or less (to be confirmed by a trip generation analysis).
- **Screening for Local-Serving Retail:** Local-serving retail projects (projects with less than 15,000 square feet of retail) may be screened on the basis that they attract trips that would otherwise travel longer distances. While new drive-throughs are prohibited in the City, some drive-throughs have been grandfathered in before the prohibition went into place; projects with drive-throughs would be excluded from screening under these criteria, and City staff retain discretion to deny the use of the small project exemption if substantial evidence exists that screening is not appropriate. City staff retain the



discretion to apply similar qualifications for the small project screening criteria as those that apply for *Projects in Proximity to a Major Transit Stop*.

- **Screening for Projects in Proximity to a Major Transit Stop:** Projects located within one-half mile of existing or planned high-quality transit corridors or major transit stations. Proximity to transit is explicitly listed in the CEQA Guidelines as a reason to presume a project has no significant impacts based on VMT. While no such locations exist in Sebastopol today, this may change in the future.

The OPR *Technical Advisory* notes that a presumption of less-than-significant should not be applied under this screening criteria, and a VMT analysis should be performed, if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75
- Includes more parking than required by the City of Sebastopol
- Is inconsistent with Plan Bay Area
- Replaces deed-restricted affordable residential units with a smaller number of moderate- or high-income residential units (although a small market-rate project could qualify for small project screening)

If any of the above conditions apply, a detailed VMT analysis should be conducted to determine whether the project exceeds the VMT thresholds. City staff retain discretion to deny the use of the proximity to major transit stop exemption if substantial evidence exists that screening is not appropriate.

- **Screening for Projects Located in Low-VMT Areas:** Residential and retail projects in low-VMT areas (per the CEQA thresholds noted in this memorandum) that incorporate similar features to the nearby developments (i.e., density, mix of uses, parking availability, and transit accessibility), may be screened out on the basis that the project will exhibit similarly low VMT. Typically, this screening is performed by utilizing data from a travel demand model (e.g. the SCTA travel demand model) and comparing the project's characteristics to land uses currently in the low-VMT area. Screening maps for 2024, 2025, and 2026 have been provided in **Attachment A**. These maps will be superseded over time by the forthcoming SCTA travel demand update project.

If the project is inconsistent with the underlying data (e.g., a single-family project in a zone with no existing single-family residential uses), then screening is not appropriate and a detailed VMT analysis should be conducted to determine whether the project exceeds the VMT thresholds. City staff retain discretion to deny the use of the low-VMT area exemption if substantial evidence exists that screening is not appropriate.

- **Screening for Affordable Housing:** The City may screen residential projects in infill locations containing 100 percent affordable housing (based on local circumstances and substantial evidence as determined by the City) on the basis that affordable housing



generates less VMT than market-rate housing. Furthermore, affordable housing located within infill locations generally improves jobs-housing balance and may thus result in shorter commutes for low-income workers.



V. Proposed VMT Thresholds of Significance for Transportation Projects

This section provides an introductory discussion of how transportation projects should be evaluated under CEQA. Since this is a complex and evolving topic, only a high-level overview is provided.

Technical Advisory Guidance on VMT Impacts from Transportation Projects

Pages 19-28 of the OPR *Technical Advisory* discuss a number of aspects of this topic. The following summary outlines the key recommendations of this portion of the *Technical Advisory*:

1. The “induced vehicle travel” caused by certain transportation projects must be quantified. Induced vehicle travel, or induced VMT, refers to additional driving resulting from implementing projects that reduce congestion and make driving easier or more convenient. Projects that would likely lead to induced VMT, or, in other words, a “measurable and substantial” increase in vehicle travel (i.e., VMT), generally include: addition of through lanes on existing or new highways, including general purposes lanes, carpool lanes, auxiliary lanes, or lanes through grade-separated interchanges. Local streets are addressed in Item 2 below.
2. A variety of transportation projects would not be expected to induce more vehicle travel. The following page lists these project types, though it is noted that evidence is not provided to support that conclusion of no net increase in VMT. This includes projects that improve bicycle and pedestrian safety.
3. A generally accepted interpretation of the Technical Advisory is that a transportation project that causes a net increase in VMT would be considered to have a significant impact. Although a specific significance threshold is not provided in the *Technical Advisory*, it states on multiple occasions that transportation projects that do not generate additional VMT are presumed to have less-than-significant impacts. Part 2b of Section 15064.3 of the CEQA Guidelines (Determining the Significance of Transportation Impacts) states that “Transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact.”
4. VMT attributable to a project should represent the difference in VMT with and without the project across the full area in which driving patterns are expected to change. VMT should not be truncated at model or jurisdictional boundaries.
5. Mitigation for VMT impacts caused by transportation projects may include tolling new lanes, converting general purpose lanes to carpool/express lanes, funding/implementing travel demand management strategies, and implementing Intelligent Transportation Systems (ITS) strategies.



Proposed VMT Threshold of Significance – Transportation Projects

For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory* (see **Exhibit 1**), the City of Sebastopol will apply the following threshold of significance when analyzing the VMT transportation impacts of transportation projects under CEQA.

1. A transportation project would cause a significant transportation impact if it would lead to induced travel and increased VMT per capita.

The above calculation will be performed using the SCTA travel demand model for both baseline (note: not base year) and cumulative conditions. Induced VMT calculations will be performed in accordance with Caltrans guidance and consider elasticity values in addition to data from the City of Sebastopol travel demand model.



Exhibit 1. Projects on Page 21 of the *Technical Advisory* that are presumed to not cause a significant transportation impact

- Roadway shoulder enhancements to provide “breakdown space,” dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes
- Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not utilized as through lanes
- Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
- Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel
- Addition of a new lane that is permanently restricted to use only by transit vehicles
- Reduction in number of through lanes
- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles
- Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
- Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
- Timing of signals to optimize vehicle, bicycle, or pedestrian flow
- Installation of roundabouts or traffic circles
- Installation or reconfiguration of traffic calming devices
- Adoption of or increase in tolls
- Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase
- Initiation of new transit service
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
- Removal or relocation of off-street or on-street parking spaces
- Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
- Addition of traffic wayfinding signage
- Rehabilitation and maintenance projects that do not add motor vehicle capacity
- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel
- Installation of publicly available alternative fuel/charging infrastructure
- Addition of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor



VI. Next Steps

Per CEQA Guidelines §15064.7, general use thresholds such as those presented in **Section III and Section V** of this memorandum should be adopted by City Council by resolution. In addition to this step, several next steps after adoption of thresholds may be considered to provide a more complete implementation process that reflects local conditions. These steps include, but are not limited to, the following:

- **Review and revision of the SCTA travel demand model:** The upcoming SCTA travel demand model update (expected in the mid-2020s) represents an opportunity for the City to update existing and planned land use and transportation system information for the modeling. Supporting this effort at key touch points will increase the usability of the model for the City.
- **Considering City-wide and regional mitigation and funding strategies:** Mitigation for VMT impacts is very different than mitigation for Level of Service (LOS) impacts. LOS is generally mitigated by expanding vehicle travel capacity (adding lanes to a freeway, adding turn lanes) or adding additional traffic control measures (stoplights, etc.). Mitigation measures designed to reduce VMT focus on shortening trip lengths or reducing the number of trips. The effectiveness of these measures is difficult to quantify (to the standard expected under CEQA) when applied on a project-by-project basis, which could potentially lead to some projects having significant and unavoidable VMT impacts because of a lack of information to prove that the feasible mitigation measures would actually reduce the impact to a less-than-significant level. Additionally, these mitigation measures would need to be monitored for effectiveness over time, thus adding to the cost and complexity of mitigation measures. Many agencies are considering adopting agency-wide VMT mitigation strategies and funding those strategies through local or regional VMT-based mitigation fees or bank/exchange programs, similar to the City's current traffic impact fee that funds congestion-related improvements.
- **Initial mitigation strategies:** General initial mitigation strategies that could be included in the short-term (before a bank or exchange program becomes operational) includes:
 - Promoting rideshare
 - Installing and promoting carshare
 - Improving the bicycle and pedestrian network
 - Providing micromobility options (e.g. electric bikeshare, electric scootershare, etc.)
 - Unbundling parking costs
 - Limiting residential parking supply as to not overly encourage car ownership
 - Implement vanpool and/or commute trip reduction programs



Potential VMT mitigation effectiveness values for specific strategies are included in the [*Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers*](#). Strategies T-1 and T-2 in the Handbook shall not be used without substantial justification to the modification of SCTA travel demand model-prepared VMT estimates, including documentation of connectivity of high-quality (as defined by the Public Resources Code) pedestrian, bicycle and transit connections to a variety of destinations and justification of the use of Strategies T-1 and T-2 relative to the underlying research supporting the effectiveness information of Strategies T-1 and T-2.

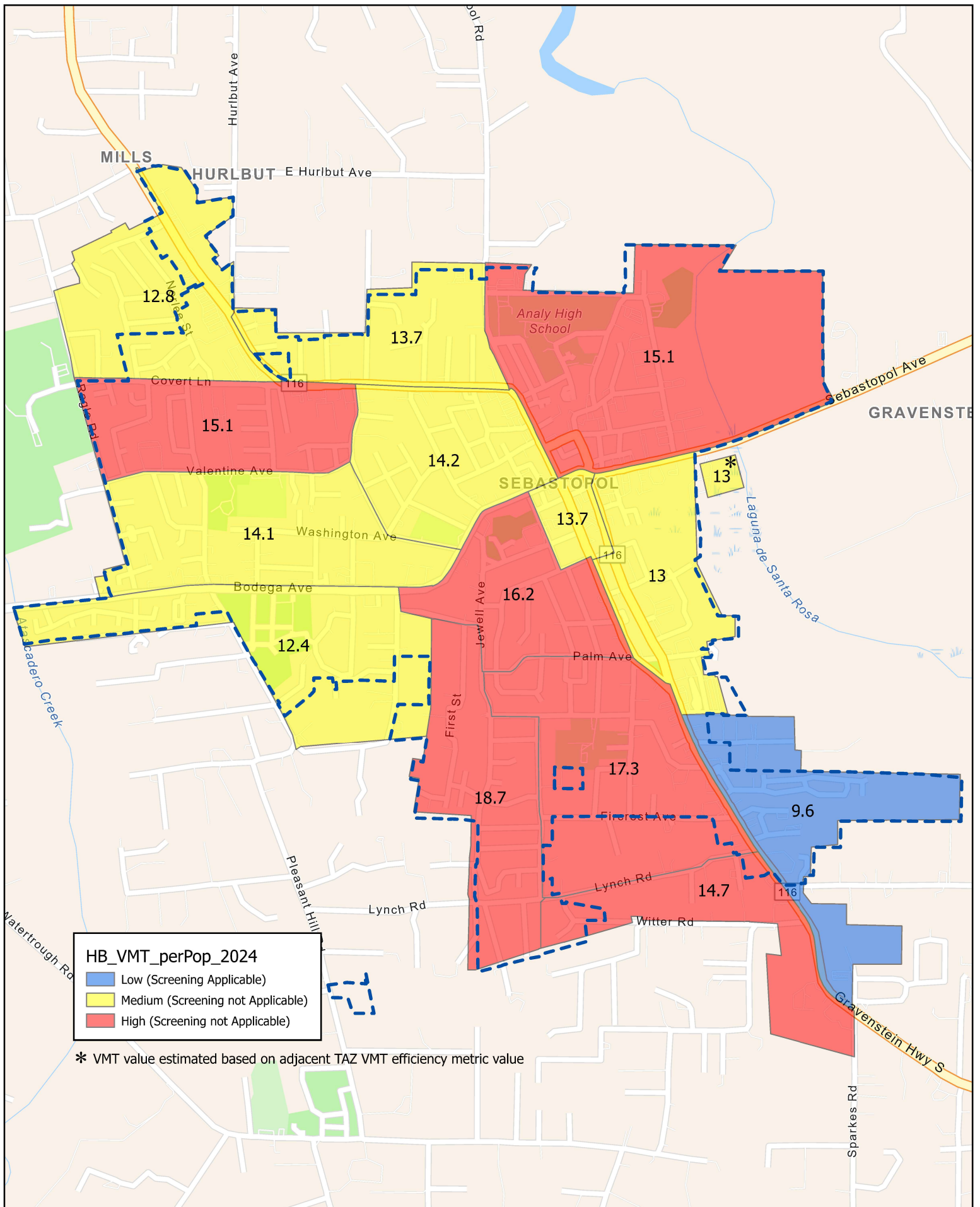


Attachment A

VMT Screening Maps

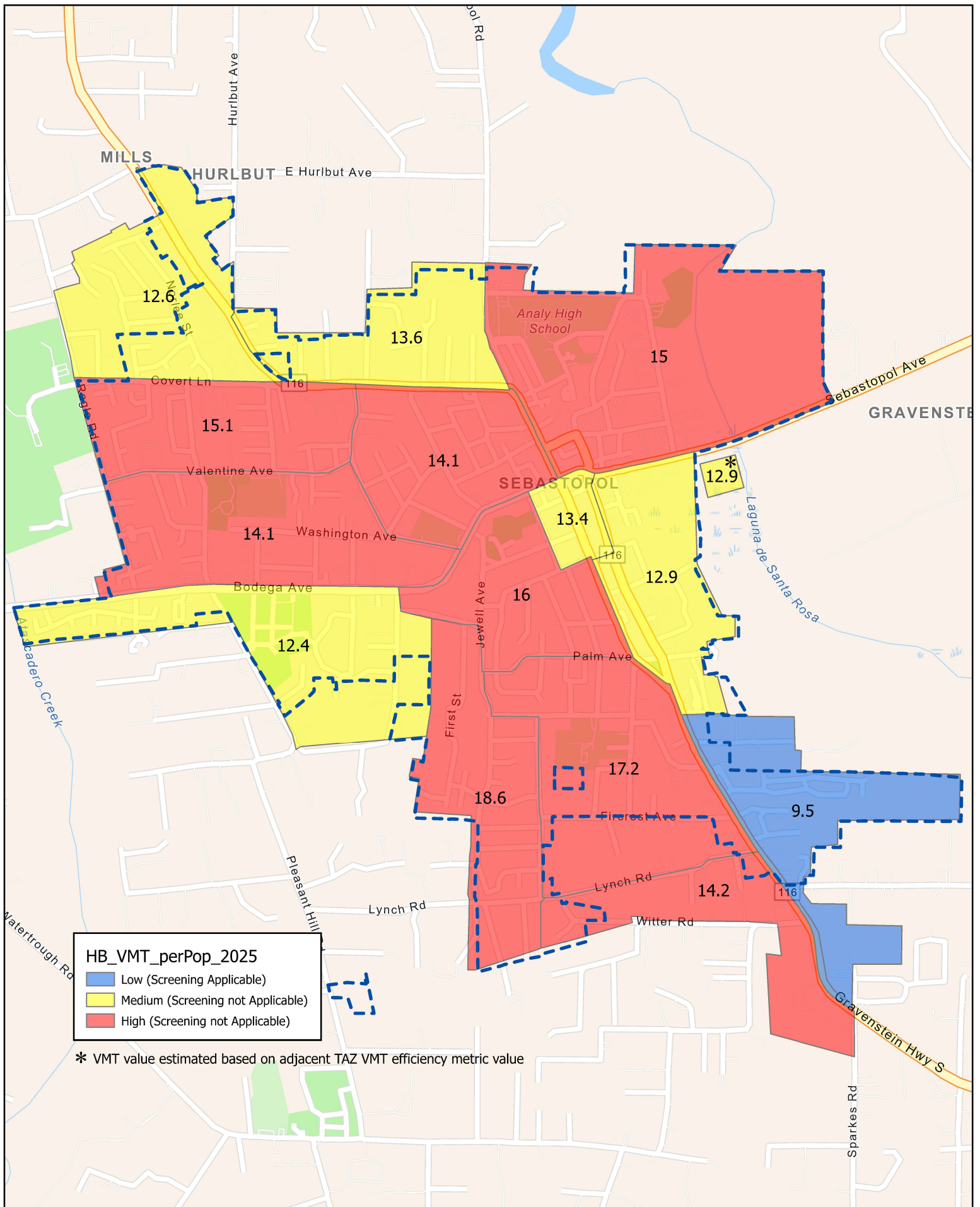
Home-Based VMT Per Resident (Year 2024)

City Average Home-based VMT per Resident: 14.2



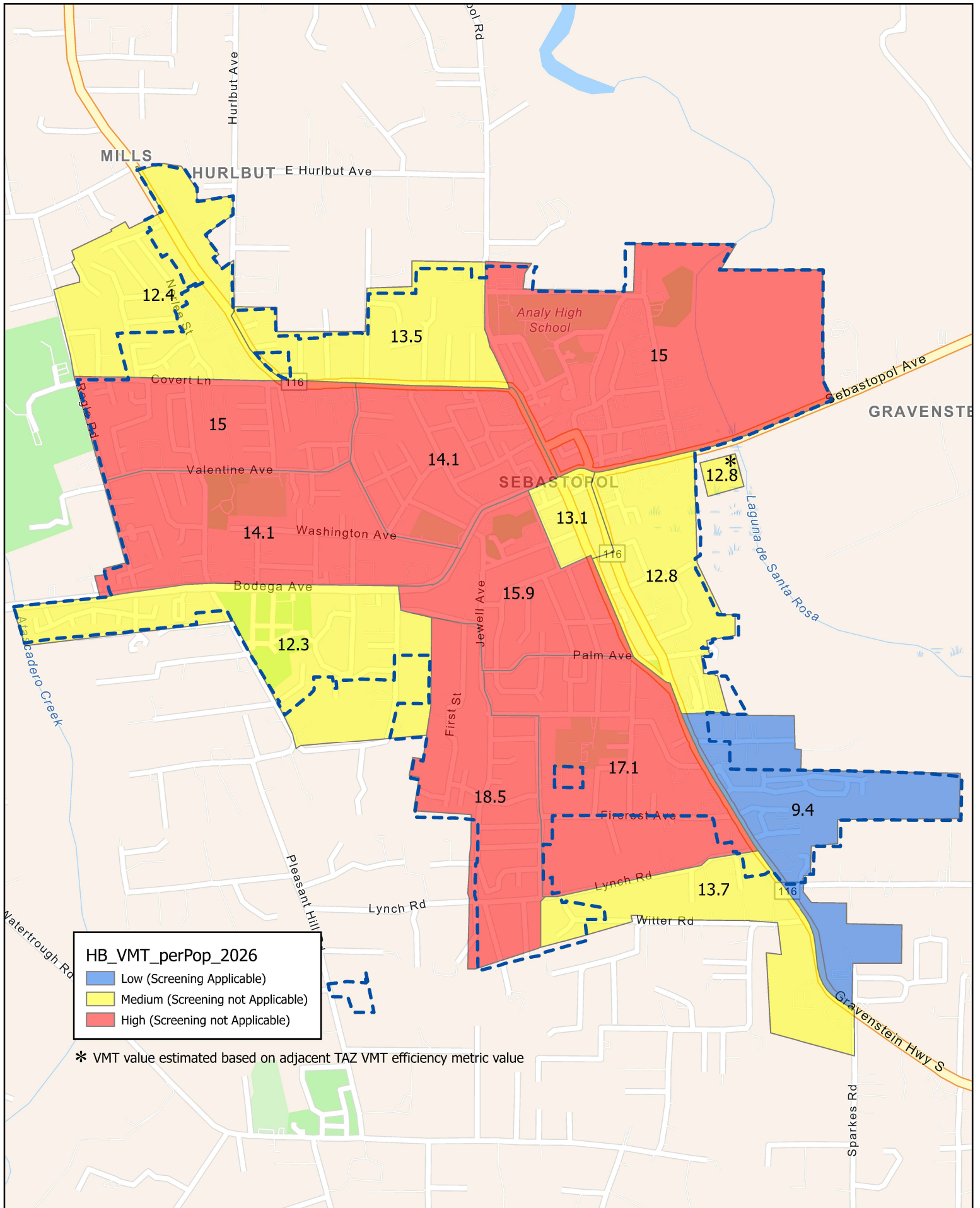
Home-Based VMT Per Resident (Year 2025)

City Average Home-based VMT per Resident: 14.1



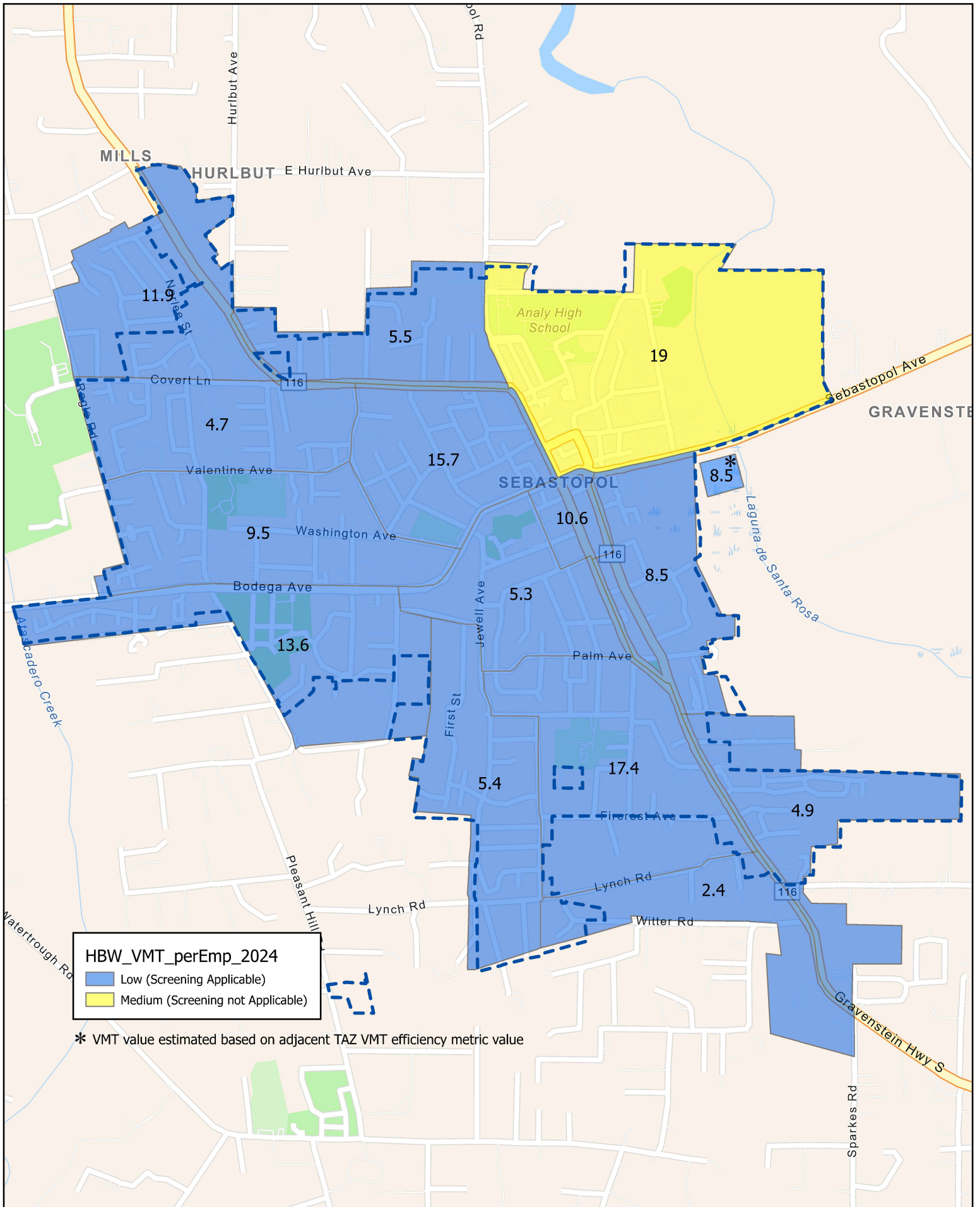
Home-Based VMT Per Resident (Year 2026)

City Average Home-based VMT per Resident: 14.0



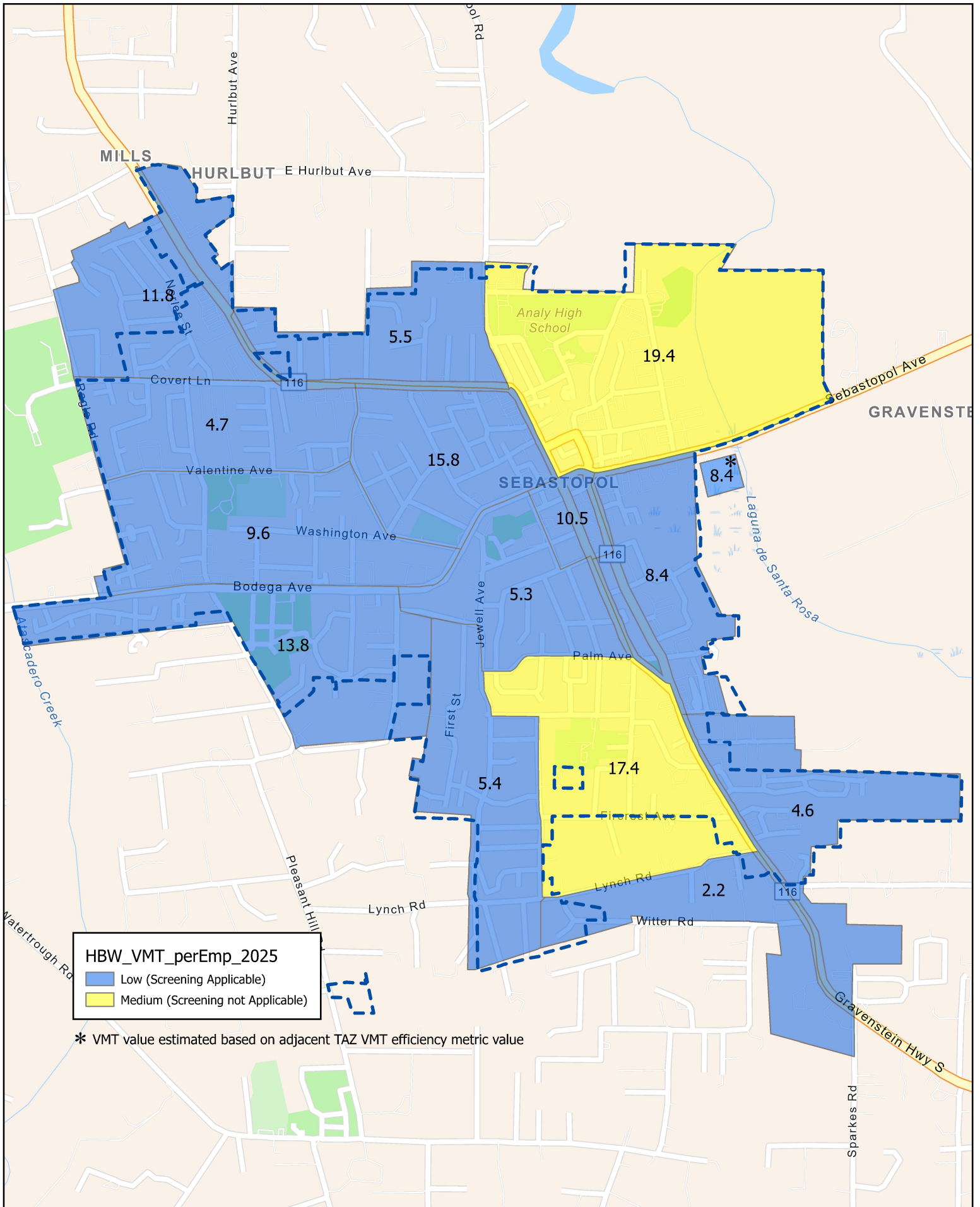
Commute VMT Per Employee (Year 2024)

Regional Average Commute VMT per Employee: 20.46



Commute VMT Per Employee (Year 2025)

Regional Average Commute VMT per Employee: 20.43



Commute VMT Per Employee (Year 2026)

Regional Average Commute VMT per Employee: 20.40

