



MEMORANDUM

Date: January 11, 2019

To: Mark Hoffman, Placeworks

From: Jason D. Pack, P.E.
Paul Herrmann, P.E.

Subject: Draft City of Corona CEQA Assessment – VMT Analysis Guidelines

OC17-0508

Senate Bill 743 (SB 743), signed by the Governor in 2013, is changing the way transportation impacts are identified. Specifically, the legislation has directed the Governor's Office of Planning and Research (OPR) to look at different metrics for identifying transportation as a California Environmental Quality Act (CEQA) impact. The Final OPR guidelines were released in November 2017 and identified vehicle miles of travel (VMT) as the preferred metric moving forward. The Natural Resources Agency is completing the rule making process to modify the CEQA guidelines, which is expected later this year. Given the timing of this implementation with the City's General Plan, it is prudent to address VMT and develop draft significance criteria to evaluate the General Plan related to VMT, and adopt them prior to circulation of the Draft Environmental Impact Report (EIR).

CEQA Guidelines Section 15064.7, *Thresholds of Significance*, encourages lead agencies to develop and publish thresholds of significance. Pursuant to Section 15064.7(b), the City would be required to adopt threshold of significance for VMT by ordinance, resolution, rule or regulation through a public review process supported by substantial evidence. We are recommending the following thresholds and methodology for the City to adopt by Resolution to supplement the City of Corona's Traffic Impact Study (TIS) Guidelines (2006).

Though, this new metric will govern future CEQA impacts, the City has identified that vehicle level of service (LOS) is still of value to Corona residents. As such, the General Plan will include policies that address LOS and identify LOS standards for which City infrastructure will strive to maintain.



Therefore, City projects will also be required to complete a traffic impact study in addition to the VMT assessment outlined in this memo.

The purpose of this memorandum is to provide recommendations related to VMT assessment (both thresholds of significance and methodology for identifying VMT related impacts). The approach outlined in this memorandum is consistent with the implementation program for SB 743 that is currently being completed by the Western Regional Council of Governments (WRCOG) for consideration by the individual agencies. The thresholds and methodology should be used in conjunction with the *Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR, December 2018)*¹, which provides greater detail on the terminology and analysis procedures described in this memorandum.

Finally, it should be noted that the City should update the City's VMT thresholds and methodology on an as needed basis to reflect changes in CEQA requirements, new methodology development, or refinement of process moving forward. As such, the City should continually review these guidelines for applicability and consultants should contact the City to ensure that they are applying the most recent guidelines for project impact assessment.

1. INTRODUCTION

The purpose of these guidelines is to provide a general guide in assessing the potential transportation impacts of proposed development projects, General Plan Amendments and changes in zoning in the City related to SB 743. This memorandum presents the recommended methodology that should generally be utilized in the preparation of VMT analysis for traffic studies. These recommendations are based on state of the practice methodologies, address recent CEQA legislation such as SB 743, and provide consistency for future transportation studies in the County with the on-going effort being completed by WRCOG.

The Department of Public Works reserves the right to modify the TIS Guidelines requirements based on the unique characteristics of a particular project. Any person completing a VMT assessment should have sufficient background knowledge of SB 743 requirements and travel demand forecasting models to update the information as needed to complete an accurate assessment.

¹ http://opr.ca.gov/docs/20181228-743_Technical_Advisory.pdf



1.1 CEQA CHANGES

Since the last TIS Guidelines update, SB 743 was signed into law. A key element of this law is the elimination or deemphasizing of vehicle delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. This change can assist in balancing 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 which was the legislative intent of the measure.

SB 743 contains amendments to current congestion management law that allows cities and counties to effectively opt-out of the LOS standards that would otherwise apply in areas where Congestion Management Plans (CMPs) are still used. Further, SB 743 requires OPR to update the CEQA Guidelines and establish criteria for determining the significance of transportation impacts. In November 2017, OPR released their final recommended guidelines based on feedback with the public, public agencies, and various organizations and individuals. OPR recommends VMT as the most appropriate measure of project transportation impacts. 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), studies, congestion mitigation, or ongoing network monitoring; but these metrics may no longer constitute the sole basis for CEQA impacts.

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

These guidelines also tier off of the work being completed by WRCOG as part of the SB 743 implementation strategy being completed as part of that effort.

2. CEQA ASSESSMENT - VMT ANALYSIS

The following recommendations assist in determining VMT impact thresholds and mitigation requirements for various land use projects' traffic impact studies.

2.1 ANALYSIS METHODOLOGY

For purposes of SB 743 compliance, a VMT analysis should be conducted for land use projects as deemed necessary by the Traffic Engineering Division and would apply to projects that have the



potential to increase the average VMT per service population (VMT/SP). Service population is typically the aggregate of total employment and population within a study area or project. Please note that anyone that generates traffic will be included in the VMT/SP numerator for total VMT generated. For some project types it may be appropriate to include other users in the denominator for service population, such as hotel residents or school students.

The first step of SB 743 assessment will be to provide initial project screening to determine if a full VMT analysis is required:

1. Does the project have the potential to reduce VMT/SP?
2. Is the project consistent with the Regional Transportation Plan (RTP) / Sustainable Communities Strategy's (SCS)?

Depending on this screening, the analysis requirements will differ for each proposed project. The following guidance, developed for WRCOG's SB 743 Implementation study, provides screening guidance to be utilized for City of Corona projects:

Table 1 VMT Impact Thresholds		
Methods	Project Threshold	Cumulative Threshold
Land Use Plans		
<ul style="list-style-type: none"> Corona General Plan Model (CGPM) forecast of total daily VMT/SP <ul style="list-style-type: none"> To capture project effect, the same cumulative year population and employment growth totals should be used. The 'project' only influences land use allocation. 	A significant impact would occur if the project VMT/SP (for the land use plan) exceeds the Citywide average.	A significant impact would occur if the project caused total daily VMT within the City to be higher than the no project alternative under cumulative conditions.
<ul style="list-style-type: none"> Consistency check with SCAG RTP/SCS <ul style="list-style-type: none"> Is the proposed project within the growth projections in the RTP/SCS? 	NA	A significant impact would occur if the project is determined to be inconsistent with the RTP/SCS.
Land Use Projects		
<ul style="list-style-type: none"> Transit Priority Area (TPA) screening 	Presumed less than significant VMT impact for projects located in TPAs.	Project presumption applies under cumulative conditions as



Table 1 VMT Impact Thresholds		
Methods	Project Threshold	Cumulative Threshold
		long as project is consistent with SCAG RTP/SCS.
<ul style="list-style-type: none"> Low VMT area screening 	Presumed less than significant VMT impact for projects located in low VMT generating model traffic analysis zones (TAZs). These TAZs generate total daily VMT/SP that is less than the baseline level for the City.	Project presumption applies under cumulative conditions as long as project is consistent with SCAG RTP/SCS.
<ul style="list-style-type: none"> Project type screening 	Local serving retail projects (Per OPR's Technical Advisory less than 50,000 square feet) and neighborhood schools are presumed to have a less than significant VMT impact.	Project presumption applies under cumulative conditions as long as project is consistent with SCAG RTP/SCS.
<ul style="list-style-type: none"> VMT analysis using CGPM forecast of total daily VMT/SP 	A significant impact would occur if the project generates VMT/SP above the City average.	<p>A significant impact would occur if the project is determined to be inconsistent with the RTP/SCS.</p> <p>A significant impact would occur if the project causes total daily VMT within the City to be higher than the no project alternative under cumulative conditions. This analysis should be performed using the 'project effect' method.</p>
Transportation Projects (thresholds may apply for SB 743 or GHG purposes)		
<ul style="list-style-type: none"> Lane-mile elasticity (short-term) based on opening year no build vs. build 	A significant impact would occur if the project increased the baseline VMT within the City.	NA
<ul style="list-style-type: none"> Consistency check with SCAG RTP/SCS 	NA	A significant impact would occur if the project is determined to be inconsistent with the RTP/SCS.
<ul style="list-style-type: none"> CGPM forecast of total daily VMT 	A significant impact would occur if the project increased the baseline VMT within the City.	A significant impact would occur if the project caused total daily VMT within the City to be higher than the no build alternative under cumulative conditions.



2.1.1 Project Screening

As noted above, several types of projects can be screened from SB 743 VMT assessment. In general, the following provides guidance related to this potential screening based on the OPR Technical Advisory:

- Projects which serve the local community and have the potential to reduce VMT, such as neighborhood K-12 schools and local-serving retail less than 50,000 sq. ft.
- Projects located within Transit Priority Areas (TPAs) or High Quality Transit Areas (HQTAs) as determined by the most recent Southern California Association of Governments (SCAG) RTP/SCS should also be exempt from VMT analysis. TPAs are defined in the technical advisor as a ½ mile radius around an existing or planned major transit stop or an existing stop along a high quality transit corridor. HQTAs are defined in the technical advisory as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. A map of HQTAs can be reviewed on SCAG's website currently located here (but should be verified by the engineer/ planner related to the criteria for these areas): <http://gisdata.scag.ca.gov/Pages/GISStaticMaps.aspx>. **Figure 5.10-1** attached to this memorandum shows the TPAs in Corona.
 - Please note that projects that are in TPAs/HQTAs will also be required to complete a secondary screening step to verify the proposed project's consistency with the assumptions from the RTP/SCS. This consistency can be a land use review (e.g. are the proposed land uses already included in the RTP/SCS) or can be reviewed from a VMT/SP perspective (e.g. does the resulting land use increase or decrease the VMT/SP in the Traffic Analysis Zone (TAZ) compared to the RTP/SCS assumptions).
- Projects located in a low VMT-generating TAZ.
 - These projects will require two additional secondary screening steps:
 - Verify that the proposed land use is consistent with the existing land use that is generating low VMT/SP. This will include both a land use (type, density, demographics, etc.) comparison.
 - Verify that the proposed land use is consistent with RTP/SCS assumptions or the project improves VMT/SP compared to the RTP/SCS.



2.1.2 Full VMT Assessment

For projects that do not meet any of the screening criteria above, a traffic impact study completing a full VMT assessment will be required. To complete this assessment, the user will be required to determine if the Project-generated VMT/SP is equal to or less than the existing Citywide VMT/SP.

City of Corona General Plan Model (CGPM)

The City of Corona General Plan Model (CGPM) is the most appropriate travel demand model to use for VMT forecasting within the City. Since the model's VMT/SP is utilized to generate the Citywide averages, use of the CGPM is necessary to ensure that project VMT is evaluated consistently. As such, the user must utilize the CGPM to generate the project VMT so that the trip generation rates and average trip length information are consistent for the comparative purposes. Because the existing VMT/SP is lower in the base year than the forecast year, the VMT/SP in the base year should be used as the CEQA baseline for the analysis. We recommend the City's Traffic Model be updated every 3-5 years to reflect updates to regional transportation models and transportation methodologies used to estimate VMT.

Projects Requiring a General Plan Amendment

Projects that aren't screened out but are consistent with the general plan can typically tier from the general plan EIR and won't need an independent VMT analysis.

For a project that requires a General Plan Amendment, in addition to the Project-generated VMT, the project's effect on VMT must also be evaluated. To evaluate the project's effect on VMT, the user must include the project in the future year City travel demand model and determine if the Citywide VMT increases or not with the project under the General Plan Buildout condition.

The user may need to complete a redistribution of land use to ensure that the "no project" assessment and the "with project" assessment contain the same land use control totals for City or region; especially if the project is large enough that it would affect land use absorption elsewhere in the City or region. The user will need to work with City staff to identify the most appropriate reallocation of land use for this assessment based on project type, scale, location, etc. If a redistribution is assessed, the user should use the following approach to complete the assessment:

- Utilize an economist to identify where else in the local region would assumed development not occur if the proposed project is completed; or



- Review all TAZs within a five- to ten-mile radius of the City and reduce growth proportionately across all TAZs showing growth.
- Land use redistribution would also be required if a project reduces land use in a TPA or in a low VMT-generating TAZ compared to either existing conditions or as planned in the RTP/SCS; thus requiring additional land use to be absorbed elsewhere in the region (which may not be in a TPA or in a low-VMT generating area). The redistribution methodology noted above would also be appropriate for this type of assessment.

2.2 CEQA VMT IMPACT THRESHOLD AND MITIGATION

2.2.1 Project VMT Impacts

A project should be considered to have a significant impact if the project generates total daily VMT/SP above the existing total daily VMT/SP for the City.

2.2.2 Cumulative VMT Impacts

A cumulative impact would occur if the project results in a negative effect on VMT/SP at the Citywide level.

2.2.3 VMT Mitigation Measures

Once a significant impact is identified, the project's VMT per capita should be mitigated to be at or below the existing City VMT/SP. Mitigation should consist of Transportation Demand Management (TDM) measures analyzed under a VMT-reduction methodology consistent with Chapter 7 of the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* (August 2010) and approved by the Traffic Engineering Division and Land Use Services Department (if applicable).

If a regional program is available to reduce VMT, such as WRCOG's Transportation Uniform Mitigation Fee (TUMF) program, a fair share payment toward that program would be deemed acceptable. Please note that payments towards TUMF transportation projects that improve vehicle congestion may have unintended increases in VMT.

The following existing programs already accept payments with the end goal of mitigating CEQA transportation impacts:

- TUMF transit improvement projects



- TUMF bike & ped improvement projects
- Project funded TDM program

In addition, the City should consider implementing the following programs to mitigate VMT impacts:

- VMT Mitigation Exchange - An exchange program is a concept where VMT generators can select from a pre-approved list of mitigation projects that may be located within the same jurisdiction or possibly from a larger area. The intent is to match the project's needed VMT reduction with a specific mitigation project of matching size and to provide evidence that the VMT reduction will reasonably occur.
- VMT Mitigation Bank – A mitigation bank is intended to serve as an entity or organization that pools fees from development projects across multiple jurisdictions to spend on larger scale mitigation projects. This concept differs from the more conventional impact fee program approach described above in that the fees are directed to a few larger projects that have the potential for a more significant reduction in VMT and the program is regional in nature.



Attachments:

Figure 5.10-1 – SCAG Transit Priority Areas

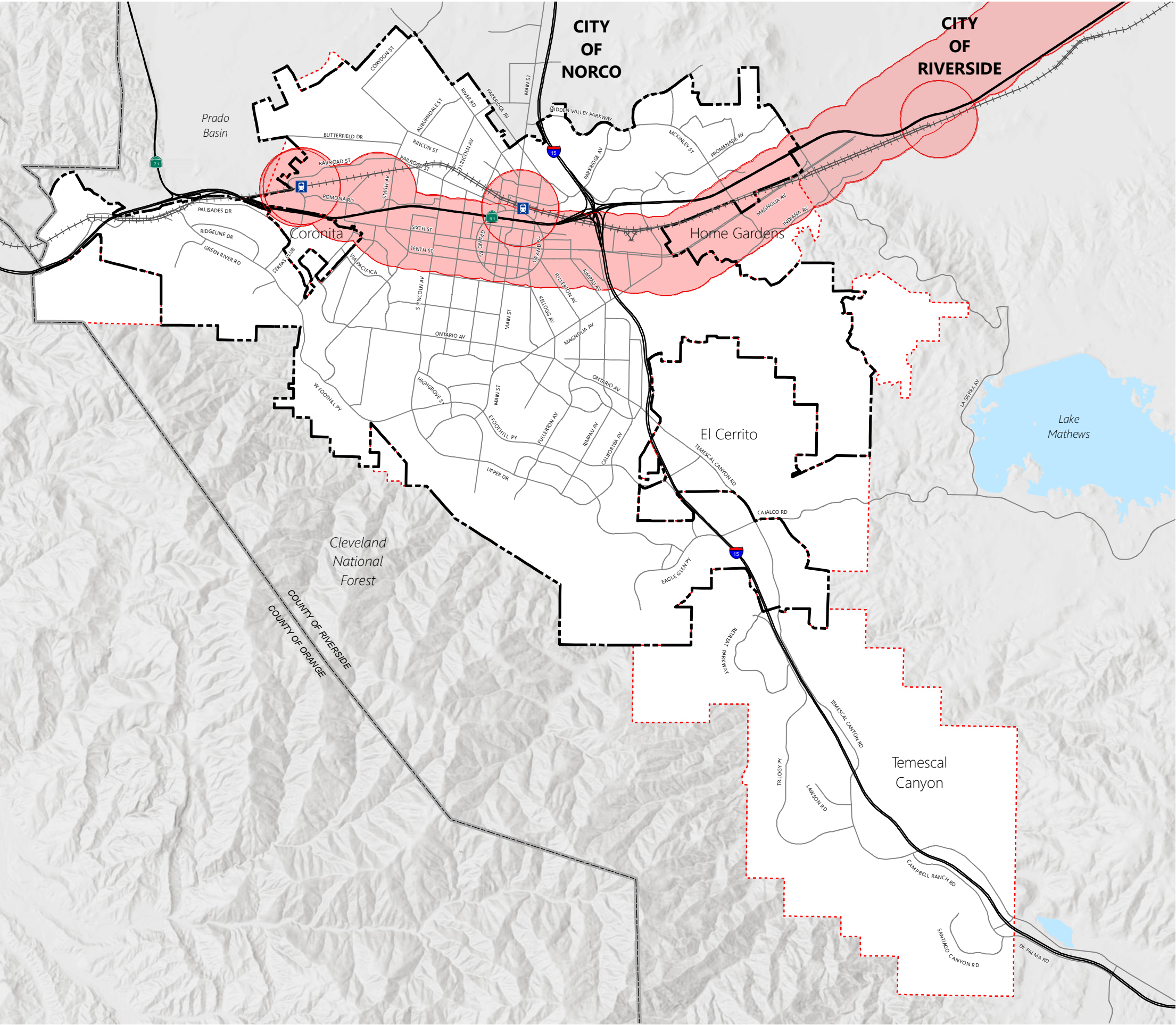


Figure 5.10-1
TRANSIT PRIORITY AREAS

- Legend
- Metrolink Station
 - SCAG Transit Priority Areas 2040
 - City Boundary
 - Sphere of Influence Areas

Source:
Southern California Association of Governments (SCAG) 2017



CORONA
General Plan
EIR

