Module 2 – Advanced SB 743

ASSOCIATION OF BAY AREA GOVERNMENTS
METROPOLITAN TRANSPORTATION COMMISSION

FEHR PEERS

San Mateo County
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July 18, 2022

Agenda

1. Introduction & Review
2. Calculating VMT

   Break *(5 min)*
3. Setting Thresholds & Screening
4. Questions and Feedback

Source: Wikimedia Commons

Introduction

1

Ground Rules

- Be an active participant
- Keep your video on if possible
- Ask questions by using the raise hand function or use the chat
- Take turns speaking and give others a chance to speak up, please mute when not speaking

Remember, this is **not** a webinar, we want it to be interactive!

Module 2 Learning Objectives

- Understand how to apply SB 743 when accounting for local context and what to consider if deviating from OPRs recommendations
- Be able to formulate threshold and screening recommendations and prepare memoranda for your jurisdictions
- Understand concepts such that you can present this information to elected officials
- Introduce VMT mitigation, which will be covered in detail in Module 3

Curriculum Overview

Phase 1a: Summer/Fall 2022

Phase 1b: Fall/Winter 2022

1

Introduction to SB 743

- Overview of Technical Assistance
- Intro to SB 743 & VMT
- OPR Recommendations

2

Advanced SB 743

- Application of VMT metrics, thresholds, and screens to your jurisdiction
- Review VMT data
- Peer examples

3

VMT Mitigation

- VMT mitigation concepts
- Available tools
- Mitigation fees, banks, and exchanges

Implementation Support

- Non-CEQA transportation
- Jurisdiction support
- Adoption strategy and implementation considerations

Module 1 Recap

- Overview of Technical Assistance
- Intro to SB 743 and VMT
- OPR Recommendations

Module 1 Recap – Summary of Questions

		Modules 4+ topics and order of sessions will be determined later		
Module 2 –Advanced SB 743	**Module 3 – VMT Mitigation**	**Potential Advanced+ SB 743**	**TIA Guidelines Support**	**Implementation and Other Policies**
How to pick appropriate thresholds and baselines	Mitigation is challenging!	Unique land uses (warehouses, tourism, schools, etc) deeper dive	How to incorporate level of service	Parking, other related policies
Unique land uses (warehouses, tourism, schools, rural, etc) intro	Banks, exchanges, other local or regional coordination options	COVID and evolving changes effect on existing and future VMT	Other CEQA checklist items – e.g., Safety / Hazards in TIA's	
Definition of screening criteria (high quality transit, affordable housing, retail size, low VMT areas, parking requirements) and how to leverage these in suburban / rural cases		Screening maps – how to ensure model reflects local context, and case studies where screening won't apply		
Relationship to CEQA guidelines and General Plan		Deeper dive on how to use CEQA guidelines and General Plan effectively		
Examples of other jurisdictions				

Memo 1 Template Review – Group Share

- Reminder of Purpose
  - Identify your jurisdiction's current transportation policies and CEQA thresholds to identify what needs to be updated.
  - Determine the process for updating, who needs to be involved, and the schedule.

- Participant questions:
  - Did this activity inspire any light bulb moments about SB 743 implementation?
  - Any successful outcomes during this activity, such as interdepartmental conversations that helped move your jurisdiction forward on VMT?
  - Any challenges that arose during this activity?

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Today

2

Advanced SB 743

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- Review VMT data
- Peer examples

Phase 1a: Summer 2022

3

VMT Mitigation

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Phase 1b: Fall 2022

Implementation Support

- Non-CEQA transportation
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VMT Data & Calculations

2

How is VMT measured?

Absolute Value

- The total amount of daily VMT to and from a place, or on a roadway
- Tends to be a “big” number
- Directly related to total **amount** of land use
- This can be further divided by **trip purpose**

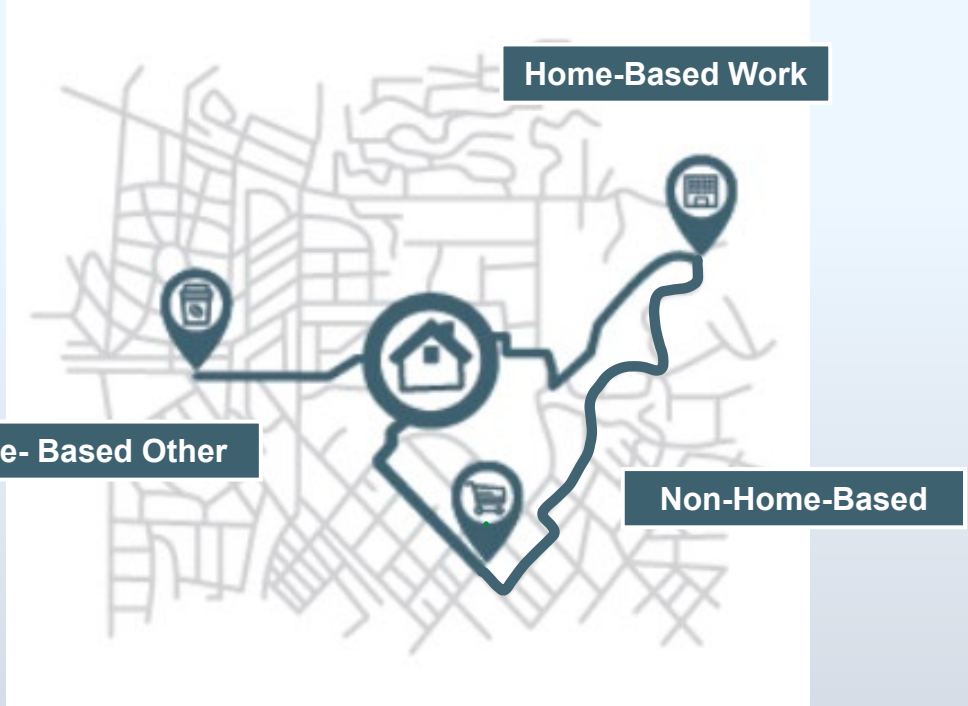
Per Capita Rate

- Absolute VMT divided by the number of residents, workers, or other population
- Tends to be a “small” number
- Directly related to the **efficiency of the project location** and the **land use type**
- Can be divided by **trip purpose**

How is VMT measured?

Trip Purposes

- All Trips
- All Home-Based trips
- Home-Based Work
- Home-Based Other
- Non-Home-Based



How is VMT measured? OPR recommendations

Land Use Projects

- **Residential *(and similar)*:**
  Home-Based VMT per Resident
- **Office/Employment *(and similar)*:**
  Home-Based Work VMT per Employee
- **Everything Else:** Discretion of jurisdiction, but consider *net change in total VMT*

How is VMT measured? OPR recommendations

Transportation Projects

- **Total VMT**
  - On Facility
  - In Region

Other CEQA Topics

- **Total VMT**
  - In study area (Air Quality)
  - In region (GHG)

Methods

- OPR Recommends using a **Travel Demand Forecasting Model** to prepare VMT estimates
- When available, model values should be used for setting baselines and for screening purposes, while always documenting the limitations of that particular model
- Available Models for San Mateo County:
  - MTC Travel Model 1.5
  - C/CAG Countywide Model
    - C/CAG VMT Tool - https://apps.fehrandpeers.com/CCAG_VMT_Estimation_Tool/
  - Individual City models

Baseline Geographies

Examples: Citywide, Countywide, or Regional geographies

OPR recommends:

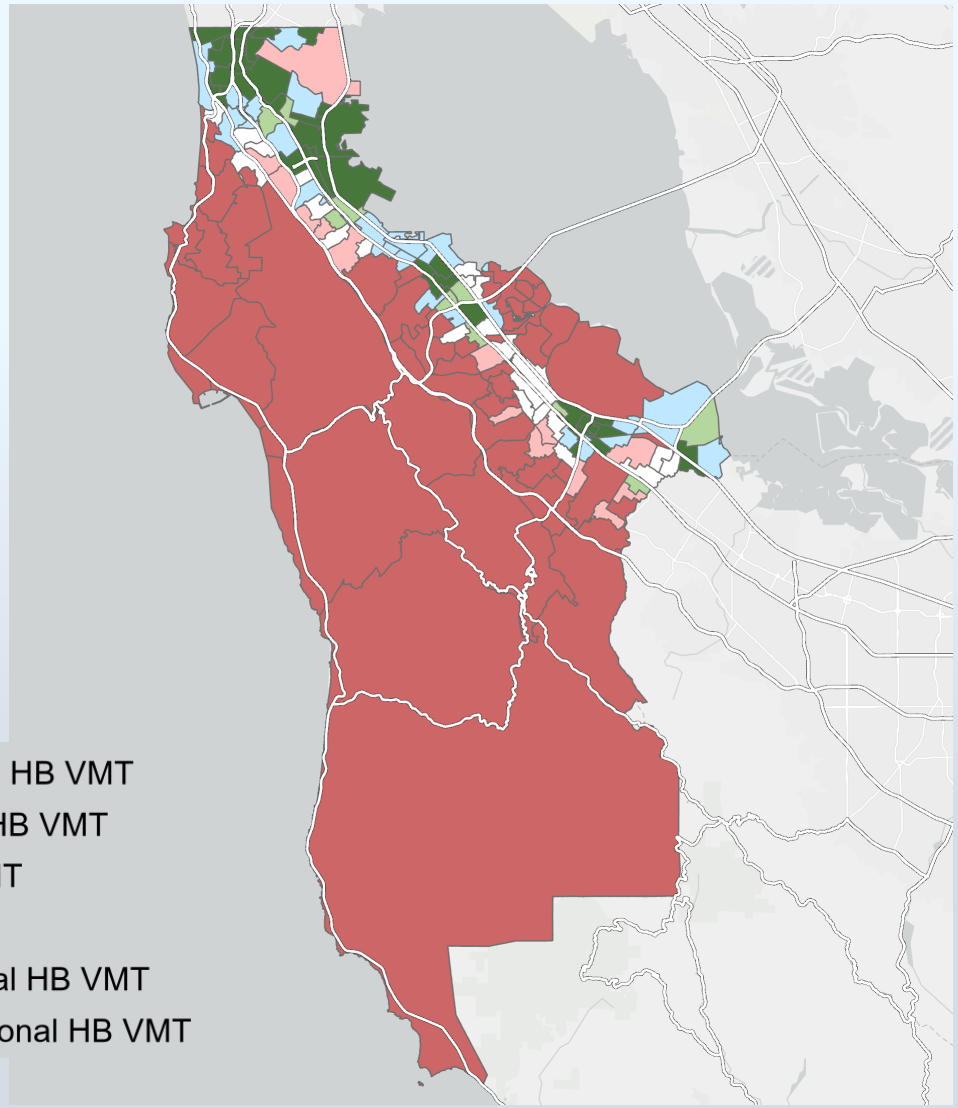
- Employment: Compare to Regional Average VMT per capita
- Residential: Compare to Regional or City Average* VMT per capita

Generally, the region is defined as the 9-County Bay Area, as that most closely aligns with the GHG reduction goals on which thresholds are based; however, some jurisdictions define the regional average as countywide average.

*Note restrictions related to Plan Bay Area consistency

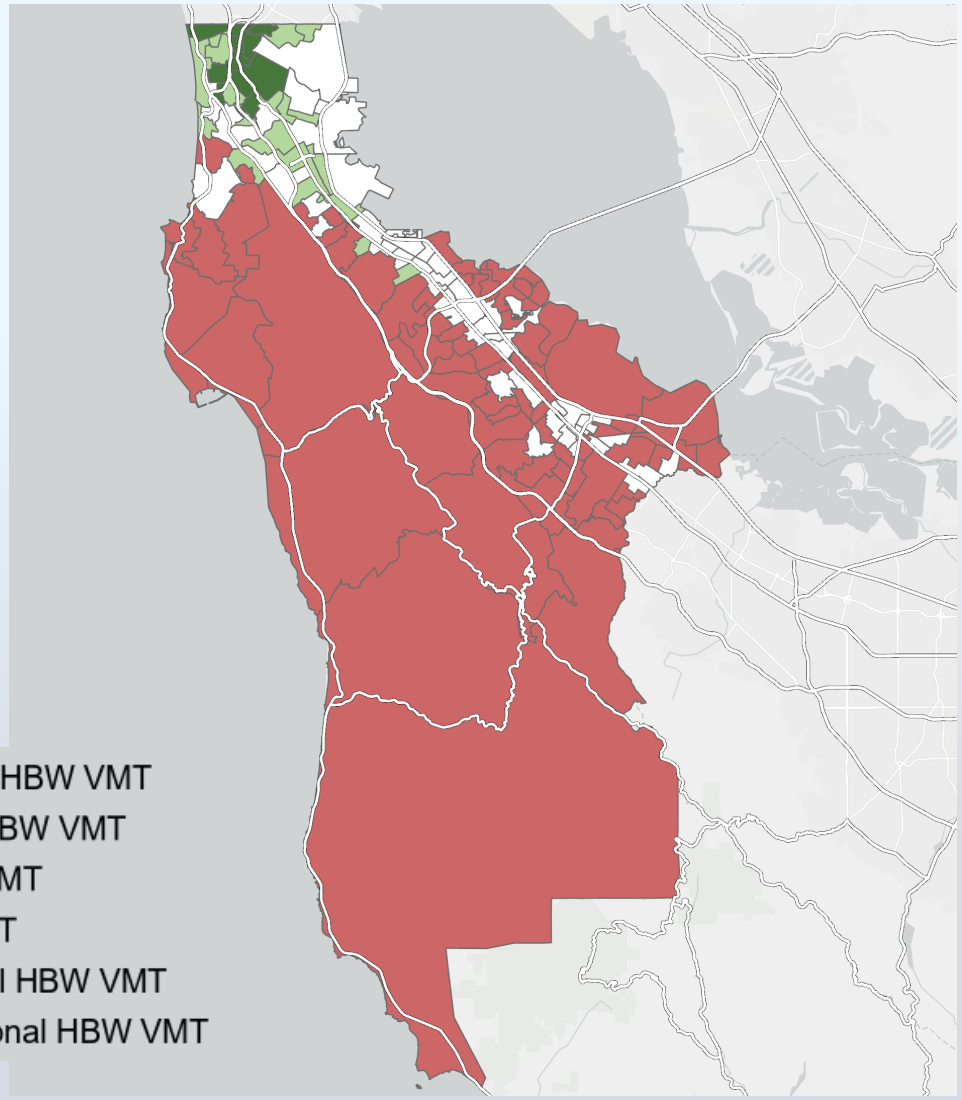
Methods – MTC Model Home-Based VMT

Jurisdiction	HB VMT per Resident
Portola Valley	28.0
Woodside	25.2
Pacifica	20.6
Unincorporated	20.6
Foster City	19.7
Belmont	18.5
Hillsborough	18.5
San Carlos	17.8
Atherton	17.7
Brisbane	17.2
Redwood City	16.6
San Mateo County	16.4
Menlo Park	16.2
Regional Average	15.3
Burlingame	15.2
Millbrae	15.1
San Mateo	14.8
San Bruno	14.5
East Palo Alto	13.9
South San Francisco	13.8
Daly City	12.3
Colma	11.1

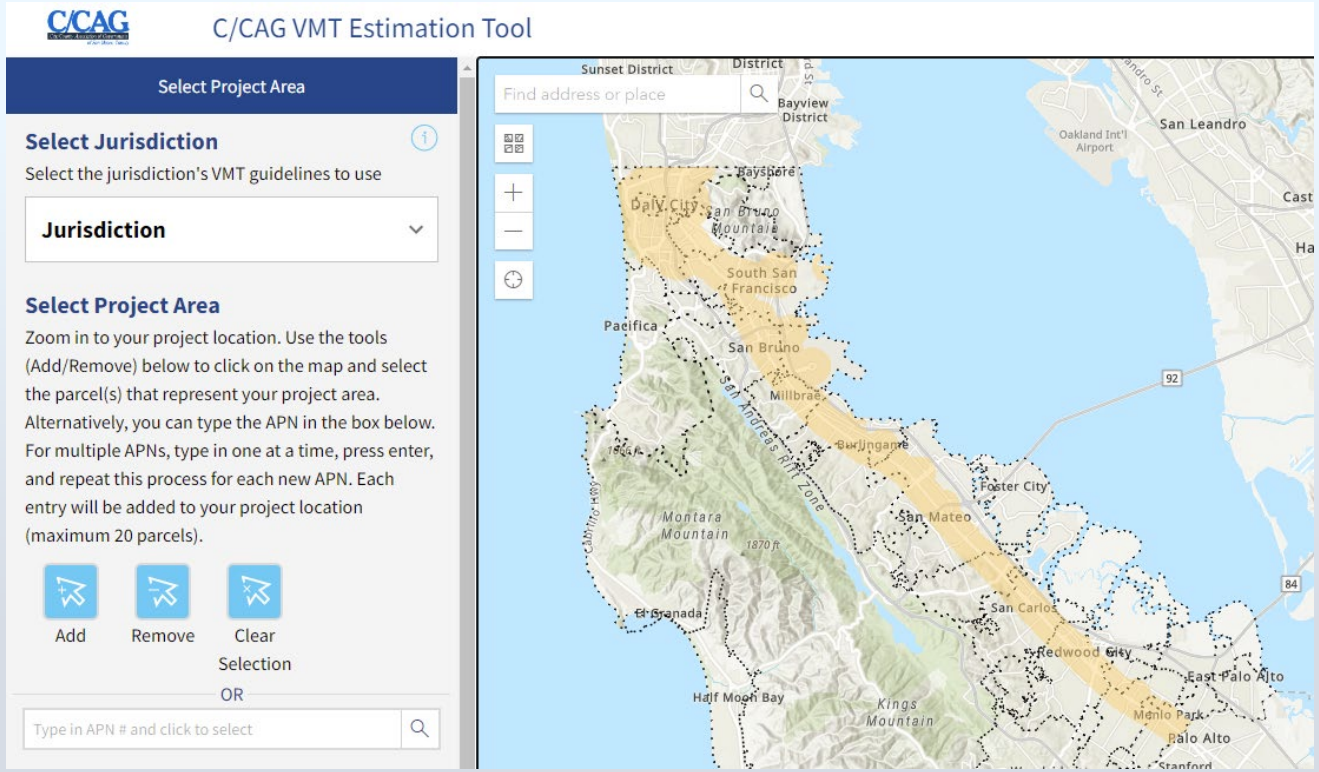


Methods – MTC Model Home-Based-Work VMT

Jurisdiction	HBW VMT per Resident
Portola Valley	29.5
Woodside	28.5
Hillsborough	24.5
Unincorporated	24.4
East Palo Alto	23.0
Redwood City	22.7
Atherton	22.6
Menlo Park	22.3
Belmont	22.2
Foster City	22.2
San Mateo County	21.4
San Carlos	21.4
Pacifica	21.3
Brisbane	21.0
Burlingame	20.7
San Mateo	20.7
South San Francisco	20.3
Millbrae	19.5
San Bruno	17.4
Regional Average	17.3
Daly City	14.9
Colma	14.5



Methods – C/CAG Countywide Model



Jurisdiction	Home-Based VMT Per Resident	Home-Based Work VMT Per Employee
Bay Area Region	**14.6**	**15.4**
San Mateo County	**13.8**	**16.8**
Belmont	13.7	18.2
Hillsborough	18.0	22.1
Menlo Park	11.5	17.4
Redwood City	13.5	17.4
San Mateo	12.6	17.3
South San Francisco	11.7	15.0
Brisbane	15.7	14.1
Foster City	15.3	16.7
San Bruno	12.6	15.0
San Carlos	13.9	16.1
Unincorporated San Mateo County	19.7	21.4
Atherton	12.5	20.8
Burlingame	14.0	16.3
Colma	8.1	10.7
Daly City	11.5	12.9
Half Moon Bay	20.4	17.6
Millbrae	13.0	16.7
Pacifica	16.2	17.9
Portola Valley	37.6	35.0
Woodside	17.1	26.6
East Palo Alto	12.3	20.4

How do we use VMT maps and tools?

Screening

- Low VMT areas allow for streamlined VMT analysis, and a presumption of less than significant impact

Project VMT estimates

- For most projects, project VMT per capita can be similar to existing VMT per capita in a TAZ, if the project's land uses are similar to existing uses
- If so, you can estimate a project's VMT with these maps

Other Methods

When might I want to do a new project-specific model run?

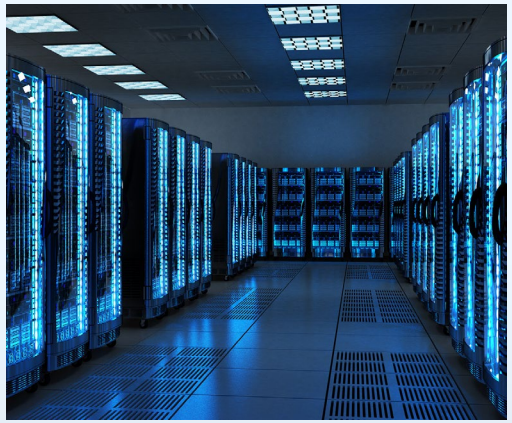
- The Project land use or demographics is *very different* from the existing land use in the TAZ
- The Project represents a *large amount of growth* in a City or TAZ
- The Project is of *high regional significance*

Example: Brisbane Baylands courtesy of thebaylands.com

Other Methods

When will a qualitative assessment make sense?

- Models are not always sensitive to small land use changes
- For visitor-serving land uses (retail, hotel, tourism, recreational facilities), many cities use a qualitative assessment
  - Will the project create more demand, or serve existing populations?
  - Will the project "siphon" trips from a more distant land use serving the same purpose?
  - Can we estimate existing typical trip lengths as a proxy for VMT?



Practical Exercise

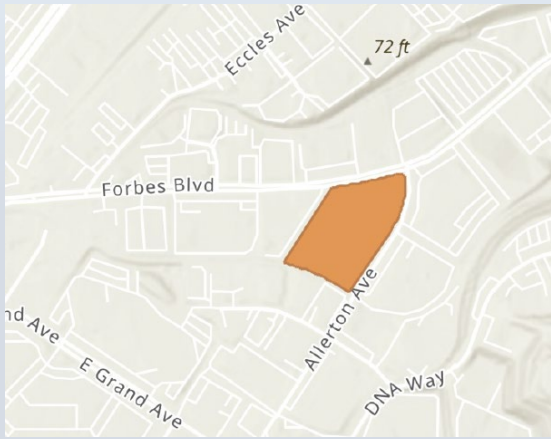
- Two “case studies” that represent land use projects typical to your county
- Break into small groups for a 10-minute discussion
- Discuss questions on following slide
- Return for 5-10 minute debrief

Case Study #1: Mixed-use / Residential

- 10ksf retail and 6 single family units in Half Moon Bay; 15 parking spaces

Case Study #2: Employment

- 128ksf bio-tech development in East of 101 Area in SSF, 267 parking spaces



Practical Exercise

Questions to discuss in small group:

- Identify the appropriate methodology/metric for that project
  - What VMT metric will you use?
  - How will you estimate project VMT?
- Estimate Project VMT using a map / table
  - Check VMT maps for your area
  - Does the project qualify for location-based screening?
- Does this pass your “gut check”?
- Bonus - If time allows, discuss “typical” projects in your jurisdictions that could benefit from having streamlined VMT approach.

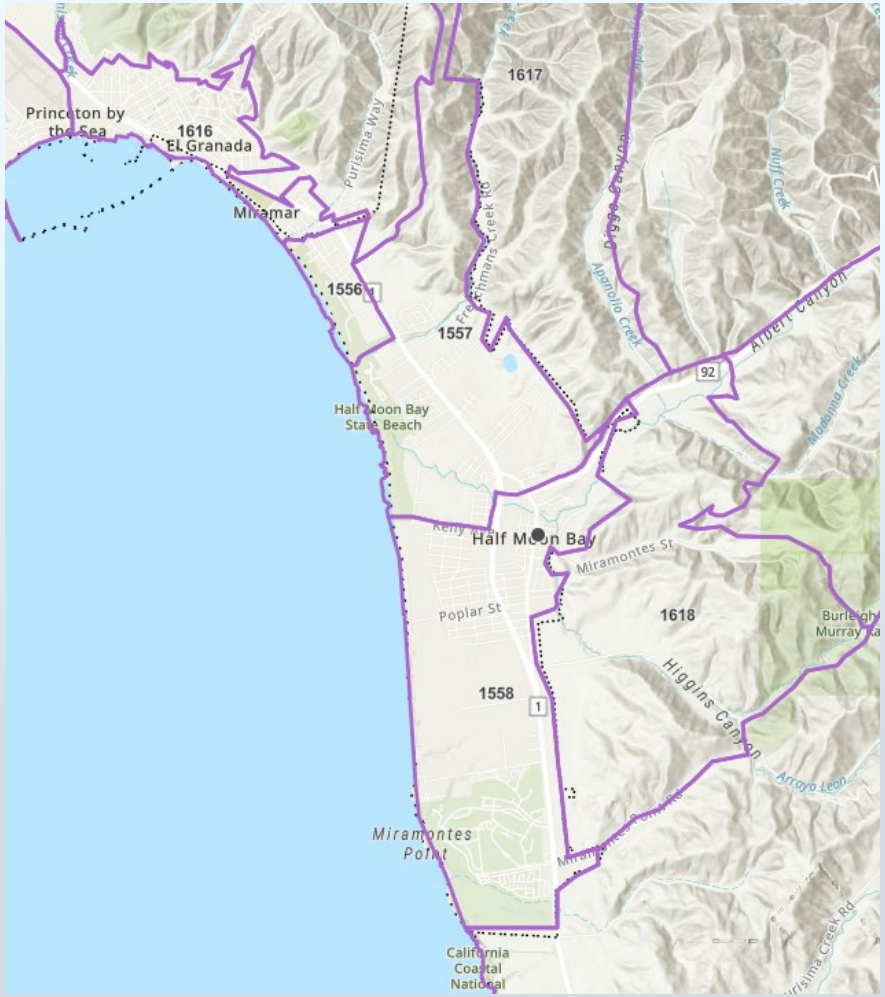
Practical Exercise – Debrief

Aim for one minute recap per group.

- Identify the appropriate methodology/metric for that project
  - What VMT metric will you use?
  - How will you estimate project VMT?
- Estimate Project VMT using a map / table
  - Check VMT maps for your area
  - Does the project qualify for location-based screening?
- Does this pass your “gut check”?
- Bonus - If time allows, discuss “typical” projects in your jurisdictions that could benefit from having streamlined VMT approach.

Half Moon Bay Example

- Model structure makes a big difference



Break

(5 minutes)

Thresholds and Screening

3

Review: OPR Recommendations

Thresholds

- Residential and office/employment projects should achieve a VMT per capita that is 15 percent below the regional average.
  - **Residential Only:** Projects can use city average as baseline instead, provided they do not exceed the cumulative number of housing units projected in Plan Bay Area and are SCS-compliant
- Retail and Transportation projects should not create an increase in regional VMT

Review: OPR Recommendations

Screening

- Certain projects that can (generally) be assumed to have a less-than-significant VMT impact:
  - Very small projects (<110 daily trips)
  - Projects close to good transit
  - Projects in areas that already have low VMT
  - Retail and services that mostly attract local trips
  - Affordable housing

Poll: What Three Topics Concern You Most?

- High Quality Transit (or lack thereof)
- Low VMT Areas (or lack thereof)
- Affordable Housing
- Local Serving Retail
- Thresholds: Baseline Comparison
- Thresholds: Percent Reduction
- Unique Land Uses
- “All of our projects will have significant impacts!”
- Other Local Concerns (Please Share!)

Local Flexibility / Local Discretion

"OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold." (pg. 10 of OPR Technical Advisory)

- General CEQA Guidance about Thresholds:
  - Should be adopted by ordinance, resolution, rule, or regulation.
  - May consider thresholds of significance previously adopted or recommended by other agencies
  - Supported by **substantial evidence**

Substantial Evidence

Substantial evidence includes:

1. Facts
2. Reasonable assumptions predicated upon facts
3. Expert opinions supported by facts

Overall, you must show enough relevant information and reasonable inferences from that information to support the reasons behind differing from OPR.

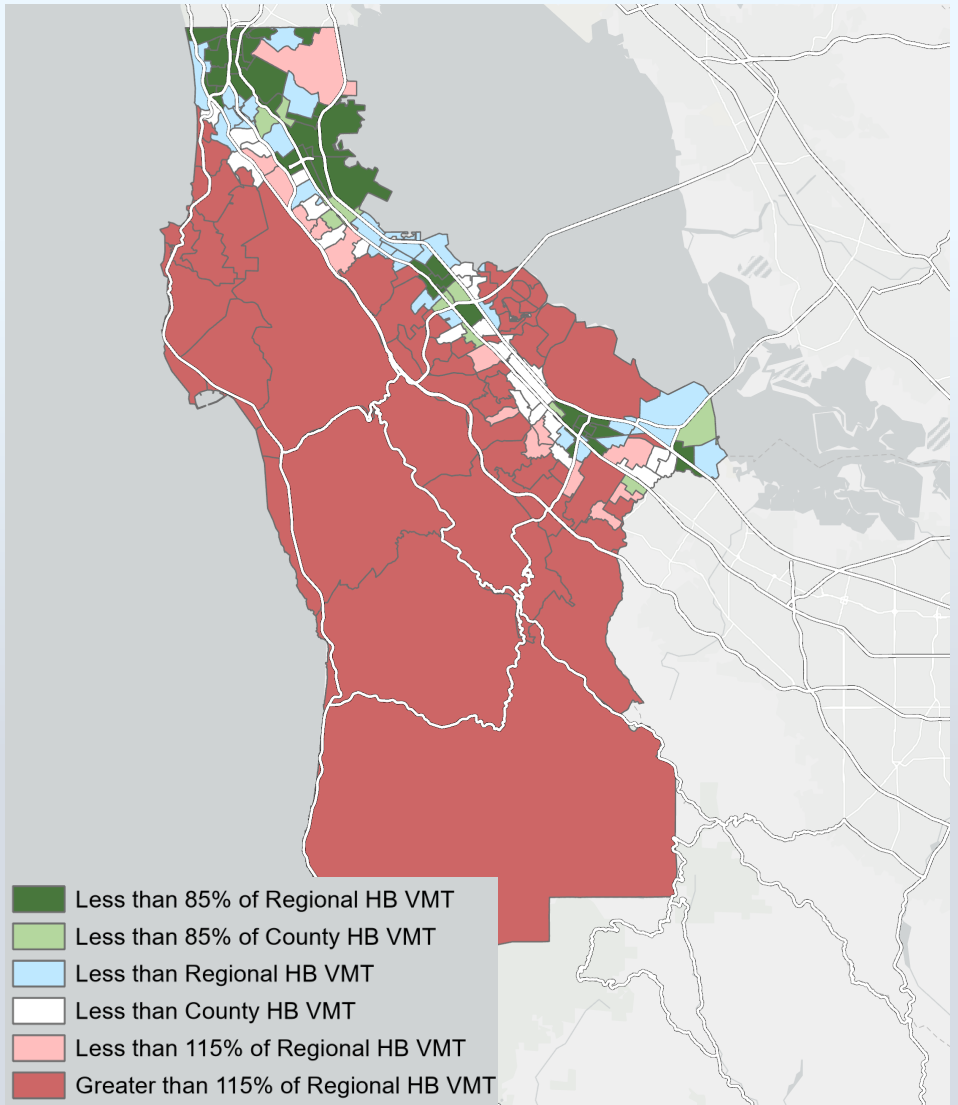
Top Three Concerns

Screening: Affordable Housing

- OPR indicates that 100% affordable housing projects may be screened in infill locations
  - Cities may pursue a lower threshold based on evidence
  - Many definitions of “affordable” based on income ranges
  - Affordable housing is also a VMT mitigation measure

Screening: Low VMT Areas

- Low VMT areas depend on baseline geography selected
- Suburban cities may not have many low VMT areas
  - Check underlying map data
- Potential deviations from OPR:
  - Housing – can use citywide average with restrictions to increase low VMT areas
  - Employment – select countywide if this can be supported by substantial evidence



Thresholds: Unique Land Uses

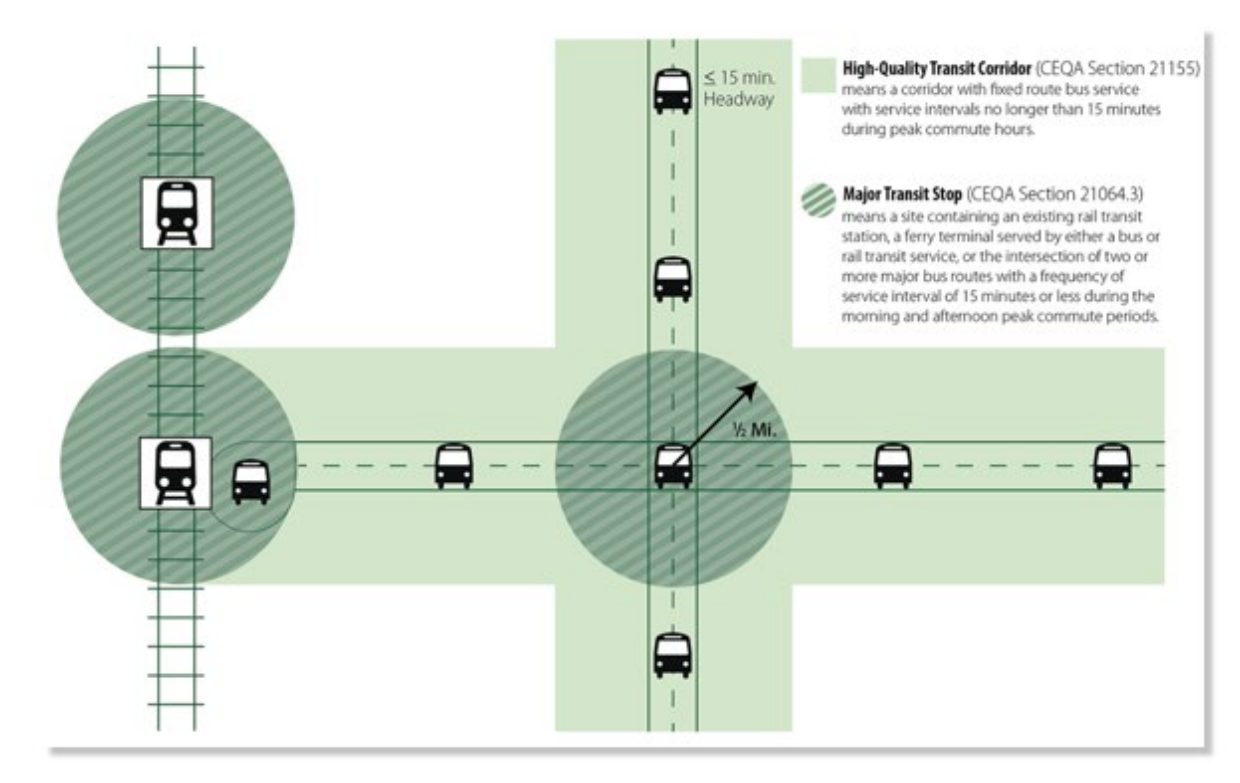
- OPR does not mention thresholds for any specific land use other than residential, office, and retail.

- Options Used So Far:
  - Travel demand model for large or complex uses
  - Qualitative assessment of no net new VMT
  - VMT no greater than average VMT per “service population” for similar land uses
  - Assess based on home-based work VMT per employee

Additional Topics

Screening: High Quality Transit

- Differences in *definitions* of high quality transit
  - 15 minutes on single line, or 15 minutes on a corridor with all routes combined?
  - Rail and ferry stations with highly infrequent service?
- Differences in *distance* to transit
  - ½ mile from rail; ¼ mile from bus (Redwood City)



Screening: Local Serving Retail

- OPR indicates that local serving retail of up to 50,000 square feet may be screened
  - Some cities are using smaller square footage (30,000 sf in Redwood City and Concord); some are allowing all retail regardless of size
  - Some cities have explicitly listed public-serving amenities as being covered by the same exemption (Redwood City, South San Francisco, Concord)

Screening: General Eligibility

Parking and FAR requirements

- "Project must not provide more than the required amount of parking"

Drive-Throughs

- Petaluma and Walnut Creek both require any land use with a drive-thru, regardless of other screening eligibility, to analyze VMT

Low Trip Generation + Long Trips

- Destination hotels, wineries

Streamlining: Tiering From Adopted GP

- In general, adopting thresholds does not require a GP update
- If the GP EIR analyzes VMT thoroughly, then:
  - Subsequent projects consistent with the General Plan may be streamlined; for example, may be eligible for MND even if in a high VMT area
  - Programmatic mitigation of VMT impacts can be applied
- Could be a focused EIR solely to address VMT policy, or could be addressed in the Housing Element EIR; get advice from legal counsel

Group share opportunity – Any advice to the group on how you are using GP EIR's to streamline tiering opportunities, especially related to housing

Thresholds: Baseline Geographies

Employment: Compare to Regional Average

Housing: Compare to Regional or City Average

Generally, the region is defined as the 9-County Bay Area, as that most closely aligns with the GHG reduction goals on which thresholds are based; but many jurisdictions define the regional average as countywide average.

Thresholds: Percent Reduction

OPR recommends using a 15% reduction compared to a baseline for residential and employment-based projects

Other thresholds adopted by cities include:

- 22% below regional average (*Based on 2020 CARB Scoping Plan)*
- 16.8% below regional average *(Based on 2017 CARB Scoping Plan)*
- Below existing *(Not recommended by OPR)*

"All Our Projects Will Have Impacts!"

- For some communities, SB743 will result in changes to which types of projects are required to produce an EIR.

- Some potential approaches to help streamline further:
  - Tier from a General Plan or Specific Plan EIR (*with GP or Housing Element update – see GP tiering slide*)
  - Develop programmatic / fee-based mitigation programs (*discussed in Module 3*)

Discussion

- What is your biggest remaining question or concern about OPR guidance?
- What do you want the VMT analysis process to look like in your city?

Questions, feedback, and work to prep for next session

4

What's Next

- Practical exercises
- Feedback survey
- Office hours – Wednesday, August 10th, 3-5pm
- Module 3 – Monday, September 19th, 3-5pm

Practical Exercises

- Review memorandum template, noting any deviations from OPR recommendations
  - Identify the baseline for different project types
  - Confirm the screening criteria and VMT thresholds
- Prepare case studies to test your recommendations
- Review potential VMT reduction strategies to prepare for Module 3

Thank you!

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