

# Module 2 – Advanced SB 743



ASSOCIATION OF BAY AREA GOVERNMENTS  
METROPOLITAN TRANSPORTATION COMMISSION

FEHR  PEERS

Cohort: Sonoma County

Presented by: Ian Barnes & Ashlee Takushi

July 19, 2022



# Agenda

**1 Introduction & Review**

**2 Calculating VMT**

**Break (5 min)**

**3 Setting Thresholds & Screening**

**4 Questions and Feedback**



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FEHR PEERS

Source: [Wikimedia Commons](#)





# Introduction

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# 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

- VMT mitigation concepts
- Available tools
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Phase 1b: Fall 2022



## Implementation Support

- Non-CEQA transportation
- Jurisdiction support
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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/"Commute"
- 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 Sonoma County:
  - SCTA Travel Demand Model
  - MTC Travel Model 1.5
  - TAM Activity Based Model\*

\* Only use TAM for a project that has substantial VMT effects also in Marin County

# 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

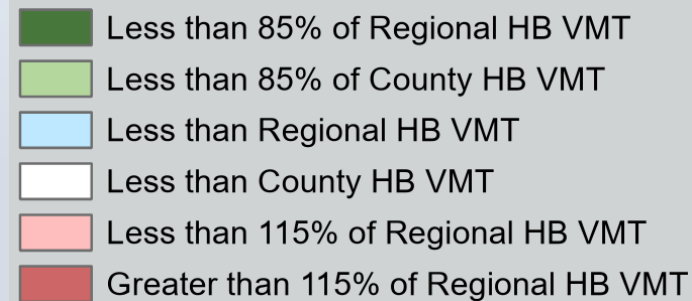
**Generally**, the region is defined as the 9-County Bay Area, as that most closely aligns with the GHG reduction goals on which thresholds are based; however, some jurisdictions in CA define the regional average as countywide average because they are single-county MPOs or they have compiled substantial evidence to support the use of a countywide average-based threshold.

\*Note restrictions related to Plan Bay Area consistency and for Unincorporated areas

# Methods – MTC Model Home-Based VMT

Jurisdiction	HB VMT per Resident
Unincorporated	20.5
Sonoma	19.3
Cotati	19.1
Petaluma	18.7
<b>Sonoma County Avg.</b>	<b>18.0</b>
Rohnert Park	17.6
Windsor	16.6
<b>Regional Average</b>	<b>15.3</b>
Healdsburg	14.0
Santa Rosa	13.2

*Note: MTC Model does not include trip lengths into Mendocino and Lake Counties*

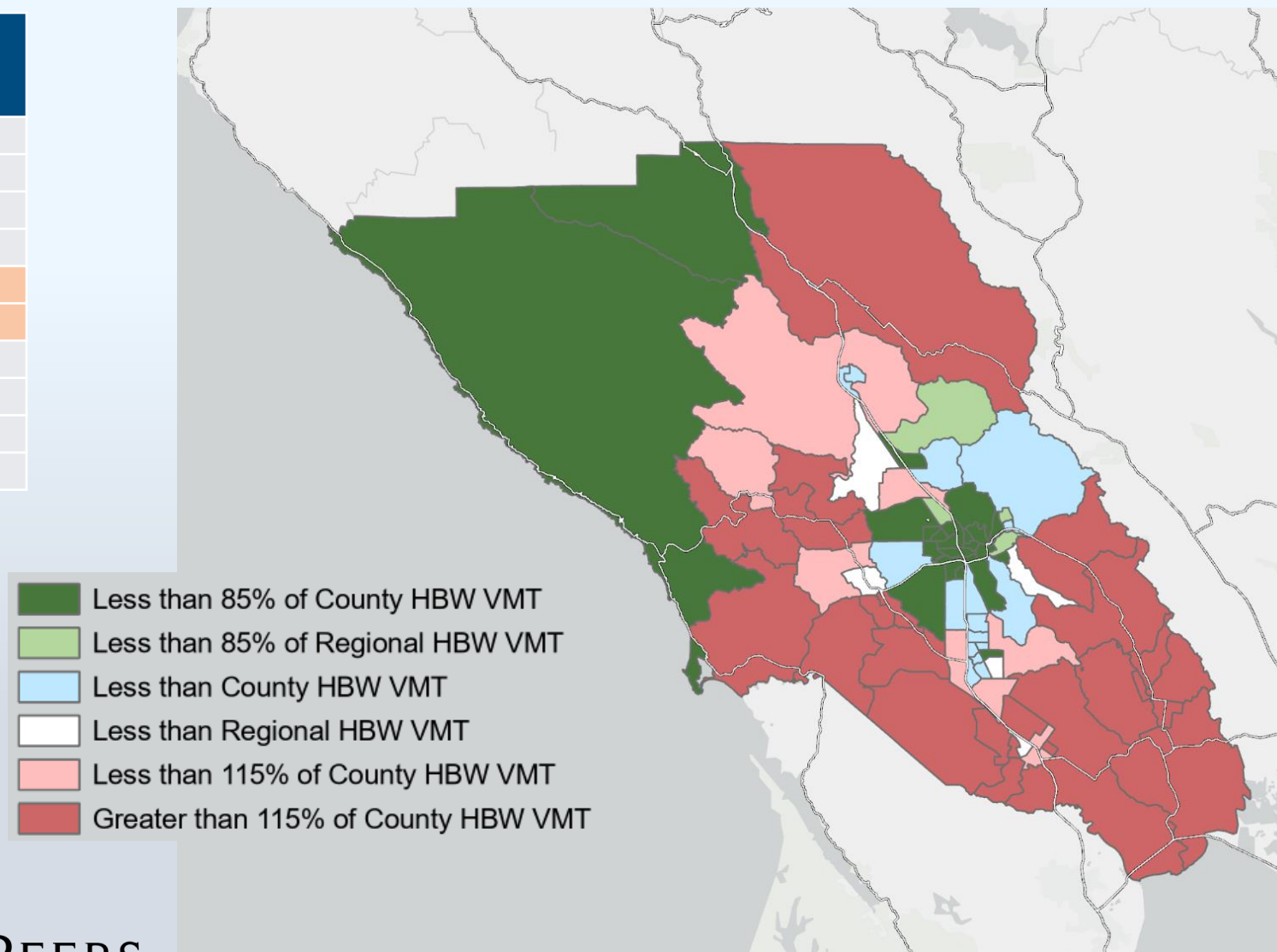




# Methods – MTC Model Home-Based-Work VMT

Jurisdiction	HBW VMT per Resident
Sonoma	23.4
Petaluma	19.0
Unincorporated	18.9
Cotati	18.0
<b>Regional Average</b>	<b>17.3</b>
<b>Sonoma County Avg.</b>	<b>16.8</b>
Healdsburg	15.6
Rohnert Park	15.2
Windsor	13.8
Santa Rosa	12.8

*Note: MTC Model does not include trip lengths into Mendocino and Lake Counties*



# Methods – SCTA Countywide Model

*Sonoma County and jurisdiction estimates extracted from the Sonoma County Travel Model 2019 validation for 2019 (published 2/10/22).*

*\*Bay Area Regional (MPO region) Average extracted from TAMDM - TAMDM is based on the MTC Regional Travel Model and covers the 9 county Bay Area. MT summary scripts are consistent with methodologies used to compile VMT estimates in SCTM.*

Jurisdiction	Home-Based VMT Per Resident
Sonoma	28.9
Unincorporated Sonoma County	21.5
Cotati	18.3
Petaluma	17.8
Sebastopol	17.1
<b>Sonoma County Avg.</b>	<b>16.6</b>
Cloverdale	15.8
<b>Bay Area Region*</b>	<b>15.5*</b>
Rohnert Park	14.8
Windsor	14.2
Santa Rosa	13.5
Healdsburg	13.3

Jurisdiction	Home-Based Work VMT Per Employee
<b>Bay Area Region*</b>	<b>22.3*</b>
Petaluma	18.3
Sonoma	16.2
Rohnert Park	14.4
Cotati	13.0
<b>Sonoma County Avg.</b>	<b>12.4</b>
Sebastopol	11.9
Unincorporated Sonoma County	11.4
Windsor	11.4
Healdsburg	11.2
Santa Rosa	9.4
Cloverdale	9.3

# 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: Sonoma County Inn courtesy of sonomanews.com, RossDrulisCusenbery Architecture Inc.



# 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
- Discuss questions on following slide

## Case Study #1: Housing

- *401 Asti Road*
- *Cloverdale*
- *75 Multi-Family Units*

## Case Study #2: Hotel

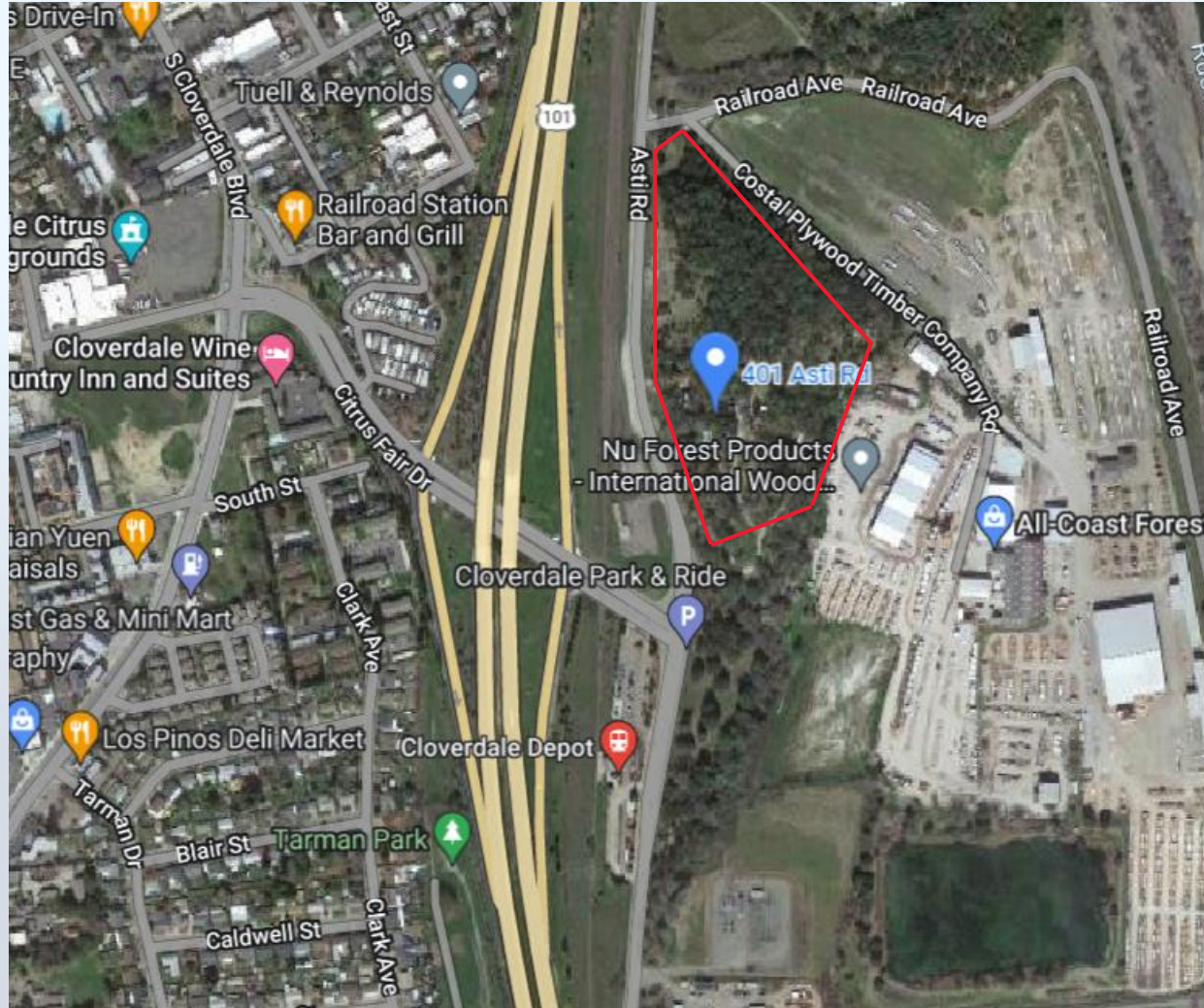
- *Located east of Redwood Drive and Laguna Drive*
- *Rohnert Park*
- *100 Rooms*

# Practical Exercise

## Questions to discuss in small group:

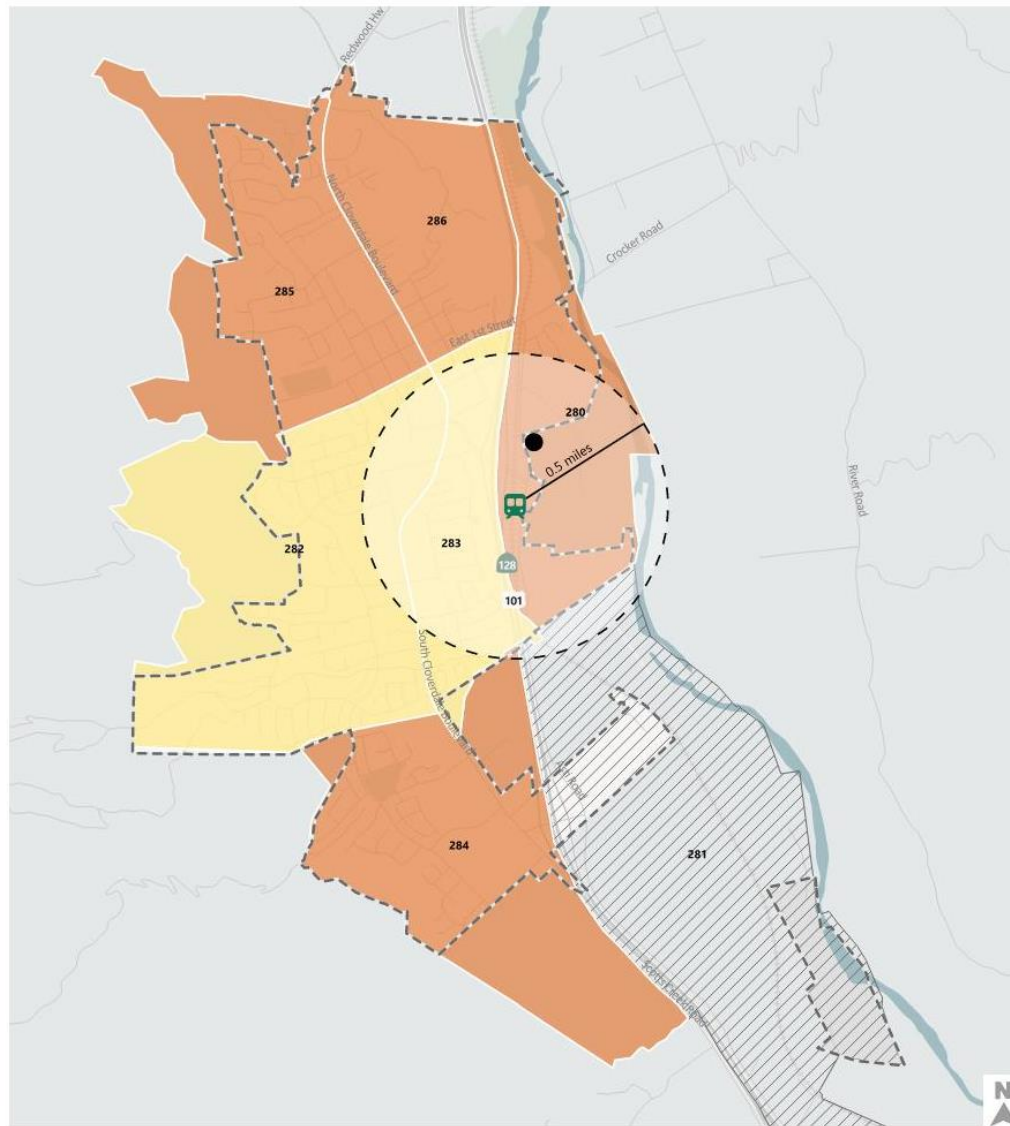
- Identify the appropriate methodology/metric for that project
  - What VMT metric will you use?
  - How will you estimate project VMT?
- Estimate Project VMT using a map / table
  - Check VMT maps for your area
  - Does the project qualify for location-based screening?
- Does this pass your “gut check”?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

# Housing Example



## Case Study #1: Housing

- *401 Asti Road*
- *Cloverdale*
- *75 Multi-Family Units*



Source: Sonoma County Travel Demand Model (2022)

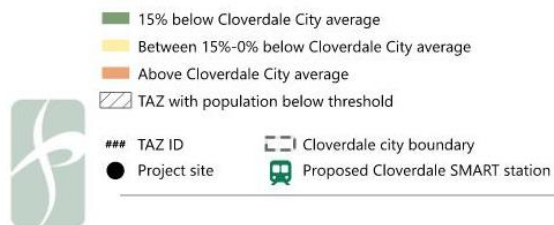


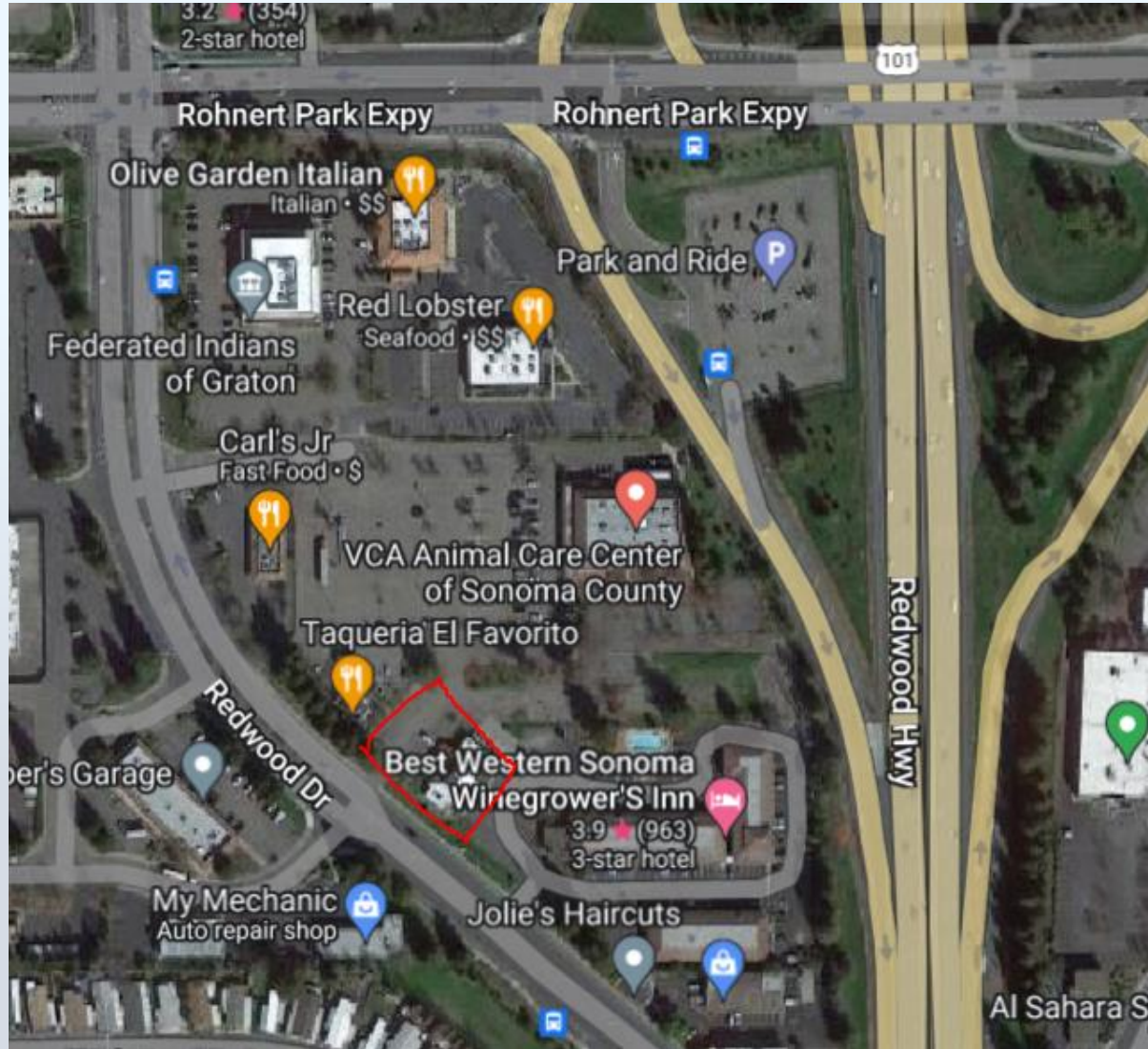
Figure 1  
2019 Residential VMT Per Resident  
Compared to Citywide Average  
SCTA Model

## Case Study #1: Housing

- *401 Asti Road*
- *Cloverdale*
- *75 Multi-Family Units*



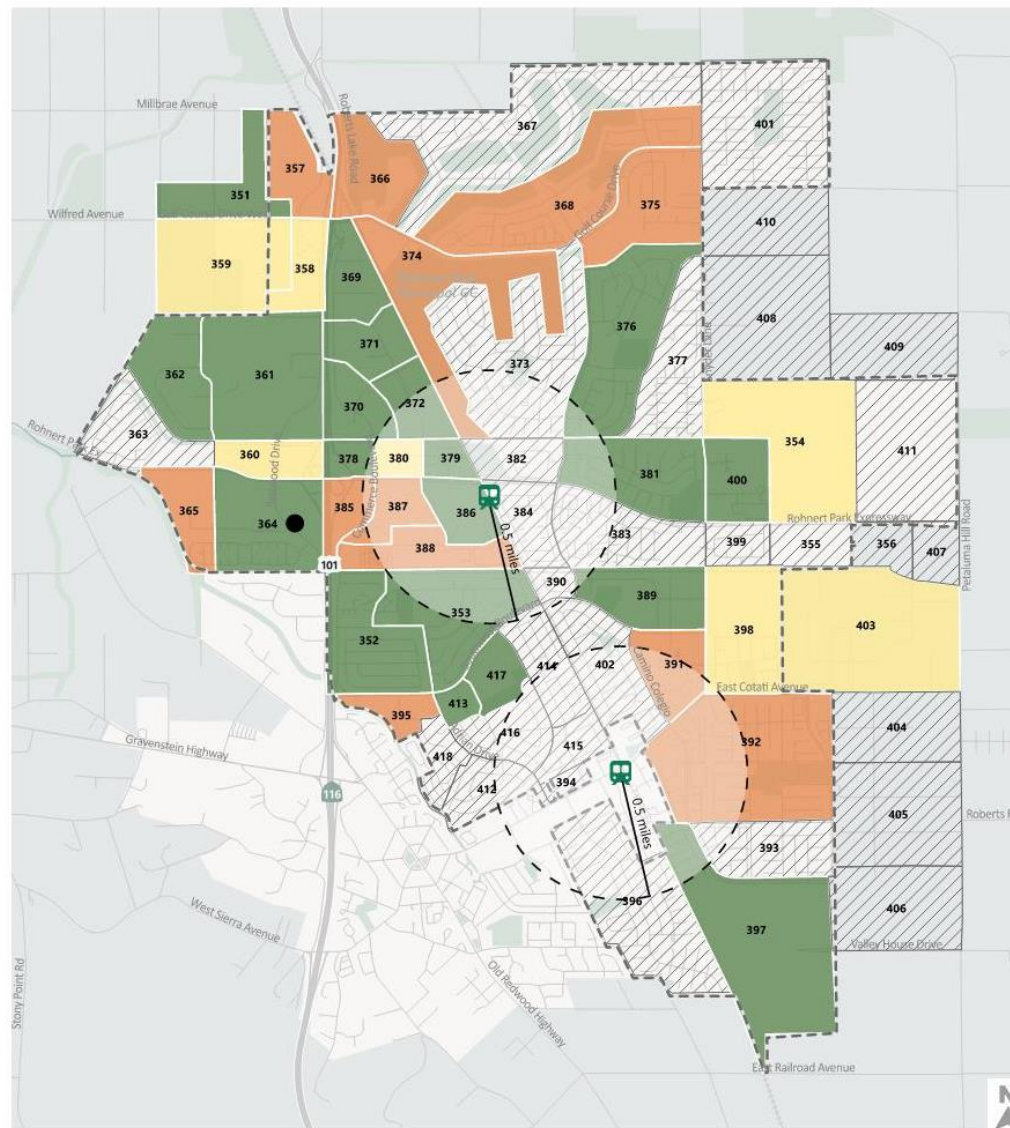
# Hotel Example



## Case Study #2: Hotel

- *Located east of Redwood Drive at Laguna Drive*
- *Rohnert Park*
- *100 Rooms*





Source: Sonoma County Travel Demand Model (SCTA); Transportation Authority of Marin Demand Model (TAMDM) (2022)

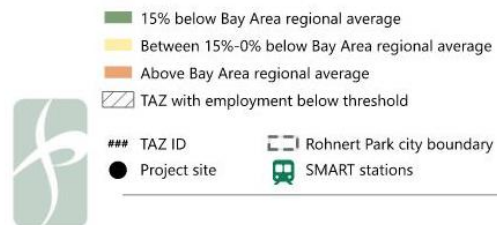


Figure 2  
2019 Employment VMT Per Employee  
Compared to Bay Area Regional Average  
SCTA Model & TAMDM

## Case Study #2: Hotel

- Located east of Redwood Drive at Laguna Drive
- Rohnert Park
- 100 Rooms

# 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 in incorporated cities 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
- Hotel, medical office, etc. that does not neatly fit into a category should have VMT broken down by generating component (employee, visitor, etc.)

# 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?

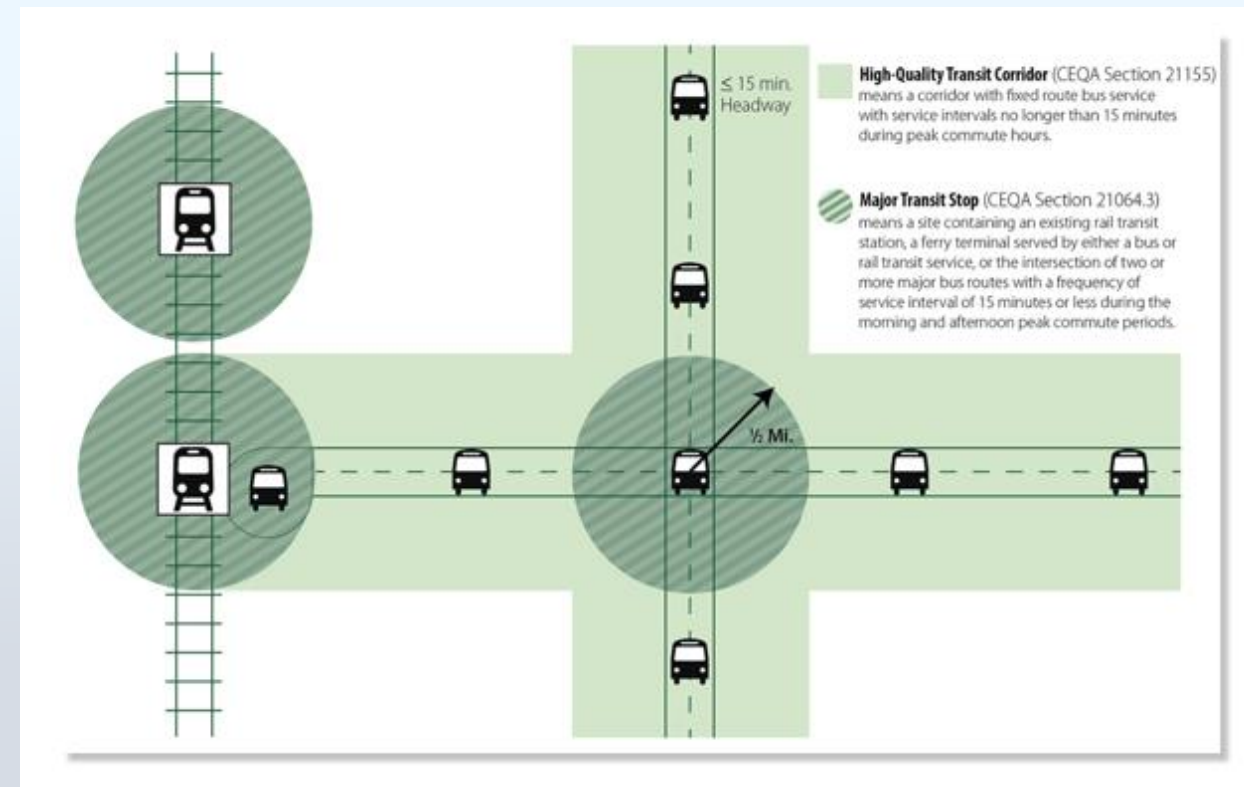
- High Quality Transit (or lack thereof)
- Low VMT Areas (or lack thereof)
- Affordable Housing
- Local Serving Retail
- Thresholds: Baseline Comparison
- Thresholds: Percent Reduction
- Unique Land Uses
- “All of our projects will have significant impacts!”
- Other Local Concerns (Please Share!)

# Top Three Concerns



# 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)

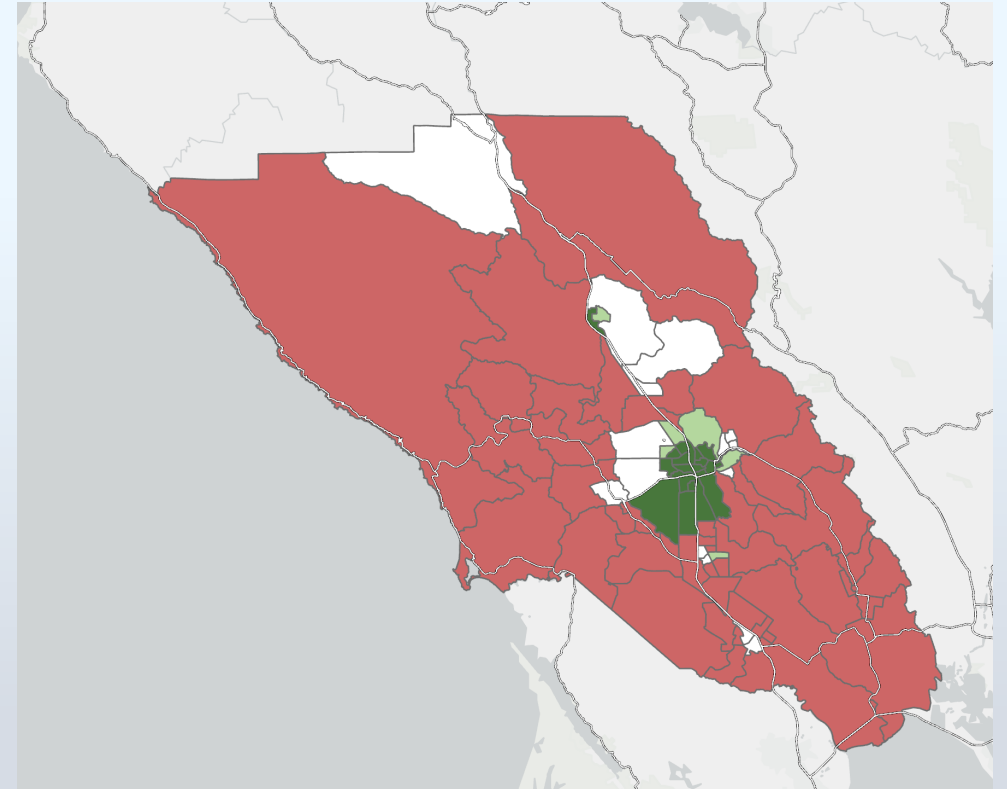


# Thresholds: Unique Land Uses

- 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

# 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



MTC Model Home-Based VMT

# 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



# “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*)

# Additional Topics



# 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: Exceptions to 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*)

# 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?



# 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 (e.g. OPR)
  - 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 and still meet the legislative intent of SB 743 (including regarding achievement of statewide climate targets).

**Questions, feedback, and  
work to prep for next  
session**

**4**

# What's Next

- Practical exercises
- Feedback survey
- Office hours – Tuesday, August 8 | 3:00 – 5:00 PM
- Module 3 – Tuesday, September 20 | 1:30 – 3:30 PM

# 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 in preparation for Module 3



# Thank you!

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