

QUICK GUIDE FOR VMT POLICY ADOPTION



VMT policy that complies with SB 743 is also compatible with and supportive of other State and local transportation and development goals. Adopting and implementing VMT analysis policy can start with a few simple steps. This quick guide will get you started, and provides an overview of policy requirements, and direction for setting thresholds, using screening tools, and defining mitigation.

CHANGING CEQA METRICS



WHY DO LOCAL TRANSPORTATION ANALYSIS GUIDELINES NEED TO BE UPDATED?

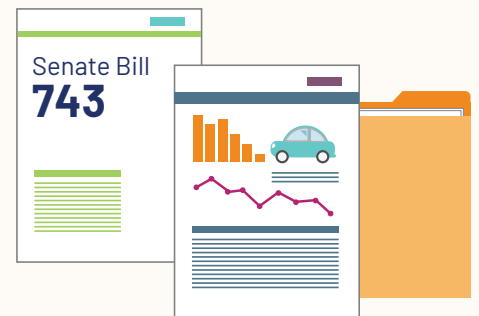
SB 743 mandates that local municipalities revise their transportation analysis guidelines to connect transportation and land use. Jurisdictions must comply with SB743 as of July 2020.



WHAT IS SB743?

SB 743 changes the focus of transportation analysis in CEQA from measuring impacts to drivers, to measuring the impact of driving.

The Governor's Office of Planning and Research (OPR) recommended that Vehicle Miles Traveled (VMT) be used as the Transportation significance threshold in CEQA, rather than Level of Service (LOS). The shift measures the amount of driving instead of traffic, incentivizing multimodal travel, a diversity of land uses, and a reduction in greenhouse gas emissions.



WHAT IS VMT

VMT is a measure of the amount of driving – in a region, transportation analysis zone (TAZ) or related to a specific project.



Numbers of Vehicles Traveling

X



Average Miles Per Vehicle



=

Vehicle Miles Traveled (VMT)



WHAT IS LOS

LOS measures the convenience of traveling in an automobile by quantifying vehicle delay at intersections and measuring speed reductions caused by the addition of more vehicles.



WHY THE CHANGE?

VMT is a better measure of a project's transportation impacts on the environment than LOS.

- ☑ Switching to VMT simplifies the development process to save staff time and provide clarity for developers, achieves climate, transportation, and housing goals, and reduces risk to projects and municipalities by establishing defensible thresholds and clear implementation guidance.
- ☑ LOS does not meaningfully reflect long-term environmental impacts. It does not differentiate people movement (i.e., no difference between single occupant vehicles and mass transit) and emphasizes traffic operations over multimodal needs).
- ☑ VMT provides a measure of the travel efficiency of a land use project, and can be used to inform zoning and Housing Elements.



WHAT DOES THIS MEAN FOR TRANSPORTATION ANALYSIS IN CEQA?

- ☑ LOS can no longer be used as a significance threshold in CEQA; LOS is a measure of a project's transportation impacts on local traffic operations.
- ☑ LOS and other traffic operations analyses may still be useful for a jurisdiction and should be conducted outside of CEQA as part of the local transportation analysis and/or conditions of approval.



ADDITIONAL TECHNICAL REFERENCES

- ☑ OPR technical advisory for evaluating transportation impacts in CEQA: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf
- ☑ OPR website FAQs: <https://opr.ca.gov/ceqa/sb-743/faq.html>
- ☑ ABAG/MTC VMT Policy Adoption Technical Assistance Curriculum materials to support policy adoption for each county: <https://abag.ca.gov/technical-assistance/vmt-policy-adoption-technical-assistance-sb743>
- ☑ ABAG/MTC VMT Screening Map dashboard data tool: <https://mtc.maps.arcgis.com/apps/dashboards/6ff269ac90784909939f5ed8813ac5de>



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SETTING APPROPRIATE VMT BASELINES AND THRESHOLDS FOR DIFFERENT LAND USES

VMT thresholds of significance provide objective measures to achieve State GHG reduction goals and reduce VMT, while enabling all communities to grow. OPR's recommendations for setting VMT baselines and thresholds align with the State's long-range GHG modeling and are considered defensible. While there are unique land uses and unique contexts to consider, the OPR guidance will cover most needs, and can be the basis for most unique project types. Thresholds will represent efficiency metrics (VMT per user group) or total impact (net increase in VMT across a region). Relevant guidance materials for each municipality are accessible through the [ABAG/MTC TA Portal](#).

HOW TO CHOOSE THE BASELINE AND THRESHOLD



RESIDENTIAL

- ☑ Use the [ABAG/MTC VMT Screening Map dashboard tool](#) to review VMT per capita data; compare City, County/Planning Area and Regional averages.
- ☑ Highest baseline average will result in the highest threshold of significance.
- ☑ Even if the City VMT per capita average is higher than the County or Regional average, this still identifies the locations with transportation infrastructure and land that contribute to lower VMT per capita relative other locations.
- ☑ The highest threshold of significance will be easier to achieve, and will therefore streamline CEQA reviews and prioritize development of more projects located in relatively low VMT locations.
- ☑ Define 15% below the selected baseline average and develop local Residential VMT per Capita map for quick reference.



OFFICE

- ☑ Use the [ABAG/MTC VMT Screening Map dashboard tool](#) to review VMT per employee data; compare County/Planning Area and Regional Averages.
- ☑ Why use the Regional VMT per employee baseline average?
 - Employment generates regional commute trips.
 - In cases where employment trips are generated within a smaller area, document substantial evidence to establish a sub-regional or county baseline average.
- ☑ Define 15% below the regional average VMT per employee and develop a regional Office VMT per Employee map for quick reference.



RETAIL

- ☑ The retail VMT threshold should be set as a net increase in total VMT (per OPR guidance), as retail developments are not typically drivers of increased VMT unless the development is for a significant regional use, like a shopping mall.
- ☑ Retail projects developing up to 50,000 square feet of new retail are not anticipated to result in increased VMT.
 - Retail projects of this size are comparable to a typical grocery store and therefore are not considered regional trip generators; rather they redistribute local trips across a smaller area.
 - Regional VMT is reduced as local workers and residents opt for shorter, more convenient retail trips.





OTHER LAND USES

- ☑ Why has OPR has devised three main land uses (retail, employment, residential)?
 - To be as broadly applicable as possible for more specific, unique land uses.
 - To provide each municipality with the discretion to assign metrics/thresholds for unique land uses that align with what City staff and decision makers identify as the closest parallel to common land uses.
- ☑ Recommended approach for identifying the right threshold for other land uses:
 1. Consider typical VMT generation for unique land uses.
 2. Compare to common land uses: are they similar to residential, office, or retail?
 3. If not, how would the unique land use change the total regional VMT per capita?
 4. Address on a case-by-case basis. First, identify similar land uses and thresholds, and document assumptions. Assumptions should be tied to a legally-defensible rationale. Second, establish technical guidelines as the precedent is set.





JURISDICTIONS CAN DEVELOP SCREENS TO QUICKLY IDENTIFY LOW-VMT PROJECTS THAT DO NOT REQUIRE ANY ANALYSIS BECAUSE RESEARCH SHOWS THEY WILL HAVE NO CEQA TRANSPORTATION IMPACT.

- ☑ This approach saves time and makes the CEQA review process more predictable. Local and developers know what to expect without conducting a detailed study.
- ☑ They can skip analysis if a project is screened out, and if a project is not screened out, there is a quick indication of what factors need to be addressed.
- ☑ Screening framework can provide an incentive for developers to build less parking, build near transit, build affordable housing, etc.

SCREENS ARE INFORMED BY PROJECT CHARACTERISTICS AND LOCATION.

- ☑ There are two types of screens for land use projects: by project type and by location (map-based).
- ☑ Some project types support lower VMT per capita travel patterns over time.
- ☑ Some locations are already supported by a mix of land uses and transportation infrastructure that contribute to lower VMT per capita travel patterns.
- ☑ Screening criteria, or basic requirements, ensure that project details support the presumption of no significant impact.
- ☑ OPR developed a list of transportation projects that can be screened.
- ☑ Instead of traffic, incentivizing multi-modal travel, a diversity of land uses, and a reduction in greenhouse gas emissions.

PROJECT-TYPE SCREENS (BASED ON DESCRIPTION OF PROJECT)

- ☑ **Small infill projects:** Small projects generate fewer than 110 trips per day (approximately 10,000 square feet of office and about 10-15 units).
- ☑ **100% affordable housing:** Research supports the finding of lower VMT per capita from affordable housing developments.
- ☑ **Local serving retail and public facilities:** Local serving destinations (typically under 50,000 square feet, similar to a typical grocery store or smaller), redistribute existing trips, often supporting shorter trips, rather than generating new trips.



LOCATION-BASED SCREENS

- Low VMT location:** Use the [ABAG/MTC VMT Screening Map dashboard data tool](#) to determine whether the project is in a TAZ with low VMT, which is 15% or more below the baseline average.
- Transit proximity:** Use the [ABAG/MTC VMT Screening Map dashboard data tool](#) to determine whether the project is within ½ mile of high-quality transit (defined by State law as fixed rail, a ferry terminal with connecting bus service, or any transit station with every 15 minute frequencies or better during commute hours).
- A project is presumed to have a VMT per capita similar to its location if it meets the following criteria:
 - Minimum density is similar or denser than existing
 - Parking supply is not excessive, with no more than the minimum number of parking spaces required by local zoning
 - Affordable units are maintained, and new project does not replace existing affordable units with a smaller number of market-rate units
 - Consistent with Plan Bay Area



HOW TO SET APPROPRIATE TRANSIT SCREENS

A project is screened out if it is located within a half-mile of a major transit stop or high-quality transit corridor (distance can be measured by travel distance on local street/path network, or with a simple radius from the transit stop)

- Major Transit Stop (per Section 21064.3 of Public Resources Code):
 - Existing rail or BRT station
 - Ferry terminal served by either bus or rail transit
 - Intersection of 2+ major bus routes with service frequency of 15 minutes or less during AM/PM peak commute periods
- High-Quality Transit Corridor:
 - Fixed route bus service with frequency of 15 minutes or less during AM/PM peak commute periods
- How to coordinate with transit operators?
 - Transit operations analysis is not a CEQA-level transportation analysis consideration under SB743. Transit operations now fall under the CEQA category requiring consistency with plans and policies.
 - Local jurisdictions can still consider transit operations within the non-CEQA elements of development review. Consider addressing this topic within conditions of approval, along with other non-CEQA review is covered.



WHAT TO DO IF THERE AREN'T ANY SCREENS

Some jurisdictions may not have any location-based screens. If there is no high-quality transit service that matches the legal definition described above, there is no basis for a transit proximity screen. If there are no TAZs with VMT per capita below the 15% threshold, the VMT model outputs do not define a low VMT location screen. This can be the result of limited model data, which is common in rural jurisdictions where each TAZ data point represents the average VMT per capita for a large area.

In these cases, it is reasonable to identify VMT screening criteria for qualifying infill housing projects. Establishing VMT screening criteria for infill housing is consistent with OPR's guidance to use alternate approaches when use of a calibrated travel demand model is unavailable or not applicable. An infill housing screen would provide a tool to streamline VMT analysis for high priority housing development, and present an opportunity to define the types of housing development that align with local housing and State climate goals.

[The Establishing an Infill and Affordable Housing Screen](#) white paper presents the technical assumptions, substantial evidence to support a legal rationale, and recommended approach for establishing this alternative location-based screen.

Additional technical resources, including details about the intention of SB743 and basis for established OPR recommendations, are provided in the [ABAG/MTC VMT Policy Adoption Technical Assistance Curriculum](#) materials.





As municipalities move toward policy adoption, questions might arise from jurisdiction staff, stakeholders, decision makers, or the public regarding whether and how to develop VMT mitigation guidelines to support policy implementation.

HOW TO MITIGATE VMT IMPACTS?

According to CEQA, for projects that are not screened out and exceed the locally adopted VMT thresholds, jurisdictions must identify and document feasible measures to reduce environmental impacts below the threshold of significance. VMT can be reduced in two ways:

1. Reduce the **number** of vehicle trips by shifting more travel to non-driving modes.
2. Reduce the **length** of vehicle trips by increasing densities or encouraging mixed uses so people can access their daily needs and destinations with shorter trips.



VMT mitigation measures may include transportation demand management (TDM) programs and features both site-specific and community-based, such as:

1. Commute trip reduction programs
2. Subsidized transit passes for employees and residents
3. Parking pricing and limited parking supply
4. Integration of affordable housing
5. Increase in residential density
6. Pedestrian, bicycle, and transit network improvements
7. Expansion of transit network or service
8. New or expanded carshare, bike share or scooter share program
9. Community-based travel planning

WHEN SHOULD MITIGATION GUIDELINES AND REQUIREMENTS BE DEVELOPED?

- ☑ VMT mitigations guidelines should be developed following adoption of VMT policy to support policy implementation, rather than as part of the adopted policy itself.
- ☑ VMT mitigation guidelines and requirements should be separate from the policy adoption. Policy adoption brings each municipality into alignment with the State's CEQA requirement for transportation analysis, but should not be prescriptive about mitigations.
- ☑ Defining VMT mitigation guidelines outside of VMT analysis policy adoption allows staff maintain flexibility over time as strategies are implemented, tested, and adjusted to maximize effectiveness in the local context. Staff can revise and update guidelines when new information becomes available, and approaches can evolve in collaboration with transit providers and other local agencies as needed.

HOW SHOULD MITIGATION STRATEGIES BE DEFINED?

- ☑ Resources for defining VMT mitigation strategies:
 - ABAG/MTC PTDM Policy Development Guide: <https://abag.ca.gov/technical-assistance/parking-transportation-demand-management-policy>
 - ABAG/MTC VMT Fee Policy Development Guide: <https://abag.ca.gov/technical-assistance/vehicle-miles-traveled-vmt-fee>
 - CAPCOA Handbook Update: <https://www.caleemod.com/handbook/index.html>
 - California Emissions Estimator Model (CalEEMod): <https://www.aqmd.gov/caleemod/home>
 - Caltrans SB 743 Implementation Resources - see Tools section for mitigation resources: <https://dot.ca.gov/programs/esta/sb-743/resources>
 - County VMT Reduction Calculator Tools - see example resources from Alameda, San Mateo, and Santa Clara Counties; navigate to county resources: <https://abag.ca.gov/technical-assistance/vmt-policy-adoption-technical-assistance-sb743>

POLICY ADOPTION SUMMARY



With the guidance and resources provided above, you are now well-positioned to initiate VMT policy adoption for your jurisdiction:

1. Adopt the baselines for the land uses that are defined in the OPR guidance.
2. Adopt the OPR screening thresholds.
3. For atypical land uses which are not easily sorted into OPR's existing land use categories, select the closest OPR land use category, and address later on a case-by-case basis.

