Fox Point Farms

Draft Transportation Impact Study

August 2020

Prepared for

Nolen Communities, LLC
1680 N. Coast Highway, #51
Encinitas, CA 92024

Prepared by

CHEN RYAN

3900 Fifth Avenue, Suite 310
San Diego, CA 92103

Table of Contents

List of Figures

List of Tables

Appendices

1.0 Introduction

The purpose of this Vehicle Miles Traveled (VMT) Assessment is to identify and document any potentially significant VMT-related impacts associated with the development of the proposed Fox Point Farms Project (Proposed Project), and to recommend mitigation measures for identified impacts, as necessary.

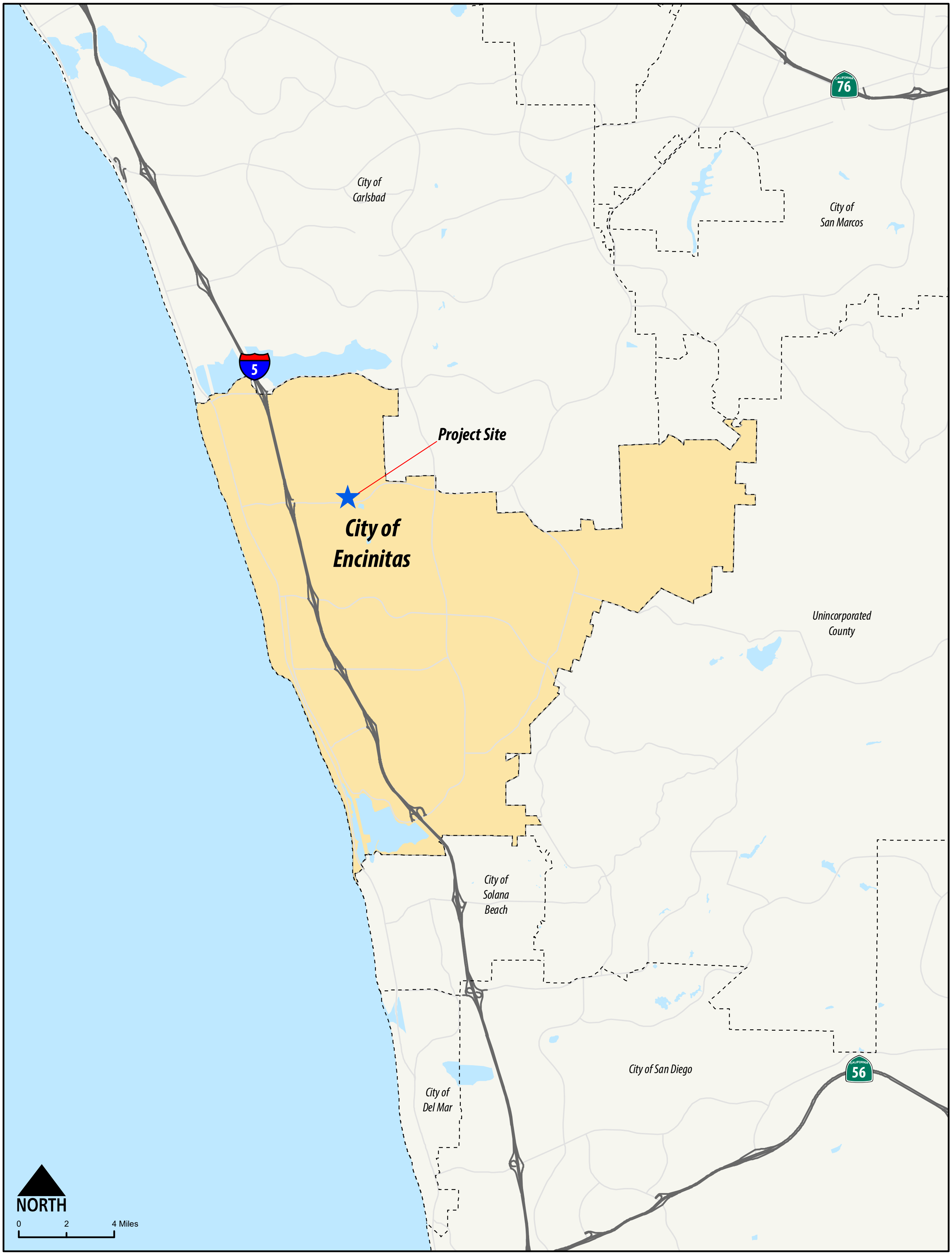
1.1 Project Description

Fox Point Farms is located at the northwest corner of the intersection of Quail Gardens Drive and Leucadia Boulevard, within the City of Encinitas. The Proposed Project would redevelop the existing 18-acre Flower Mart with up-to 250 multiple-family units, including 197 apartments and 53 “for-sale” condominiums, a 3,500 square-foot sit-down restaurant, community supporting park spaces (e.g. educational gardens, elementary school tours, etc.), a 3,213 square foot farm stand, a 3,000 square foot nursery, and 5.5-acres of farmland. **Figure 1.1** displays the Proposed Project’s regional location.

Vehicle access to the Proposed Project would be provided via the following one (1) side-street stop-controlled driveways:

- <u>Quail Gardens Drive / Project Driveway 1</u> – This driveway is the existing Dramm and Echter Flower-Mart driveway and would be maintained for the Proposed Project. It is located approximately 400 feet north of Leucadia Boulevard and would allow for full-access. This is an unsignalized intersection with traffic on Quail Gardens Drive as uncontrolled, and the Project Driveway being stop controlled. This driveway would include one inbound and one outbound lane.

A secondary access is provided on Sidonia Street, which will be gated and reserved for emergency vehicles only. **Figure 1.2** displays the Proposed Project site plan.



Fox Point Farms
Transportation Impact Study

CHEN RYAN

Figure 1.1
Project Regional Location

LEGEND

1. SITE ACCESS
2. FLOWER FIELDS
3. GREENHOUSE & COMMUNITY EVENT SPACE
4. PARKING WITH DECOMPOSED GRANITE PAVING
5. OUTDOOR EDUCATION AND EVENT PATIO
6. ENHANCED PAVING AT CROSSINGS
7. EMERGENCY ACCESS ONLY (GATE AND KNOX BOX)
8. ENTRY SIGN / WATER TOWER
9. EVENT LAWN
10. COMMUNITY GARDENS
11. FARM TO TABLE DINING AREA
12. COMMUNITY RECREATION CENTER
13. FARM TO TABLE RESTAURANT/FARM STAND
14. DISCOVERY GARDEN
15. FARM OPERATIONS
16. SOCIAL SPACE
17. OUTDOOR COMMUNITY LIBRARY
18. COMMUNITY TRAIL WITH FITNESS NODES
19. WATER QUALITY BASINS
20. BOCCE COURT
21. OUTDOOR FARM ANIMAL AREA
22. ORCHARD / FRUIT TREES
23. DOG RUN AND DOG WASH
24. BIKE RACKS
25. SWING TRELLIS
26. VINE TRELLIS
27. FARM EVENT SEATING
28. SPECIAL EVENT TRELLIS
29. HOOP HOUSE AND NURSERY PREP AREA
30. TRACTOR
31. ANIMAL INTERPRETIVE AREA

NORTH

Source: Nolen Communities & Schmidt Design Group

Figure 1.2
Project Site Plan

1.2 Project Setting

Access to the Proposed Project from the regional transportation network would be provided via Interstate 5 Freeway, Leucadia Boulevard, El Camino Real, Saxony Street, Quail Gardens Drive, and Sidonia Street. These roadways would either provide a direct connection to Proposed Project, via project driveways (on Quail Gardens Drive and Sidonia Street) or would provide a critical link between the Proposed Project and the regional transportation network. Descriptions of these transportation network facilities are described below:

Interstate 5 (I-5) – Within the project study area, I-5 is a north-south freeway located approximately 3,600 free to the west of the Proposed Project site. Access from the I-5 to the study area is taken from the Leucadia Boulevard interchange.

Leucadia Boulevard – Near the Proposed Project site, Leucadia Boulevard is a four-lane roadway with a raised median between Urania Avenue and Garden View Road, a five-lane roadway with a raised median between the I-5 northbound ramps and Urania Avenue, and a six-lane roadway with a raised median between Garden View Road and El Camino Real. Leucadia Boulevard has a posted speed limits of 40 and 45 miles per hour. On-street parking is not permitted, and sidewalks are present on both sides with exception to the segment between Quail Gardens Drive and Garden View Road where a paved path exists along the south side of the roadway. Additionally, buffered bike lanes protected by bright green plastic pylons were recently installed on Leucadia Boulevard east of I-5 to Quail Gardens Drive. East of Quail Gardens Drive, the buffers end and the bicycle facilities transition to Class II bicycle lanes up until El Camino Real. According to the *City of Encinitas General Plan* (2003), Leucadia Boulevard is classified as a Four-Lane Major Roadway – Augmented between I-5 northbound ramps and Town Center Place and a six-Lane Prime Arterial between Town Center Place and El Camino Real.

El Camino Real – Near the Proposed Project site, El Camino Real is a six-lane roadway with a raised median and a posted speed limit of 45 miles per hour between Calle Barcelona and Town Center Drive. Sidewalks and Class II bicycle facilities exist on both sides of the roadway. On-street parking is not permitted on either side of the roadway. According to the *City of Encinitas General Plan* (2003), El Camino Real is classified as a Six-Lane Prime Arterial – Augmented.

Saxony Street – Near the Proposed Project site, Saxony Street is a two-lane roadway with posted speed limits of 30 and 35 miles per hour. Sidewalks are present intermittently on both sides of the roadway, but bicycle facilities are not present on either side. On-street parking is permitted along the roadway fronting residential land uses only. According to the *City of Encinitas General Plan* (2003), Saxony Street is classified as a Two-Lane Local Collector Roadway.

Quail Gardens Drive – Near the Proposed Project site, Quail Gardens Drive is a two-lane roadway with a raised median between Ranch Road and Leucadia Boulevard. Quail Gardens Drive has a posted speed limit of 35 miles per hour. On-street parking is not permitted. A dirt path exists along the east side of the roadway and sidewalk facilities along the west side of the roadway. There are Class II bicycle facilities along both sides of Quail Gardens Drive. According to the *City of Encinitas General Plan* (2003), Quail Gardens Drive is classified as a Two-Lane Local Roadway - Augmented.

Sidonia Street – Near the Proposed Project site, Sidonia Street is a two-lane undivided roadway between Guildford Court and Leucadia Boulevard with a posted speed limit of 25 miles per hour. Sidewalk facilities are present along the west side of the roadway, but not the east side. Additionally, on-street parking is permitted along the west side of the roadway, but not the east. Sidonia Street is not classified as a circulation element within the *City of Encinitas General Plan* (2003).

Transit Access – North County Transit District (NCTD) Bus Route #304 is the only transit route that has a stop within a half-mile of the Proposed Project. The closest bus stop to the Proposed Project site is located at the northwest and southeast corners of Leucadia Boulevard and Sidonia Street (which is directly adjacent to the Proposed Project site). Bus Route 304 connects the Palomar College Transit Center to the Encinitas Station with 43 bus stops and operates with 40-minute headways. Because of the longer headways, the Proposed Project is not be considered to be within a half-mile of a major transit station[1] and therefore is not located within a Transit Priority Area. Additionally, there are no park-n-ride facilities within close proximity to the Proposed Project site. The closest major transit station to the Proposed Project site is the Encinitas Transit Station, which is approximately 2.3 road miles away and provides access to the COASTER, and NCTD Bus Routes 101, 304, and 309.

Figure 1.3 display the transportation network around the Proposed Project site.

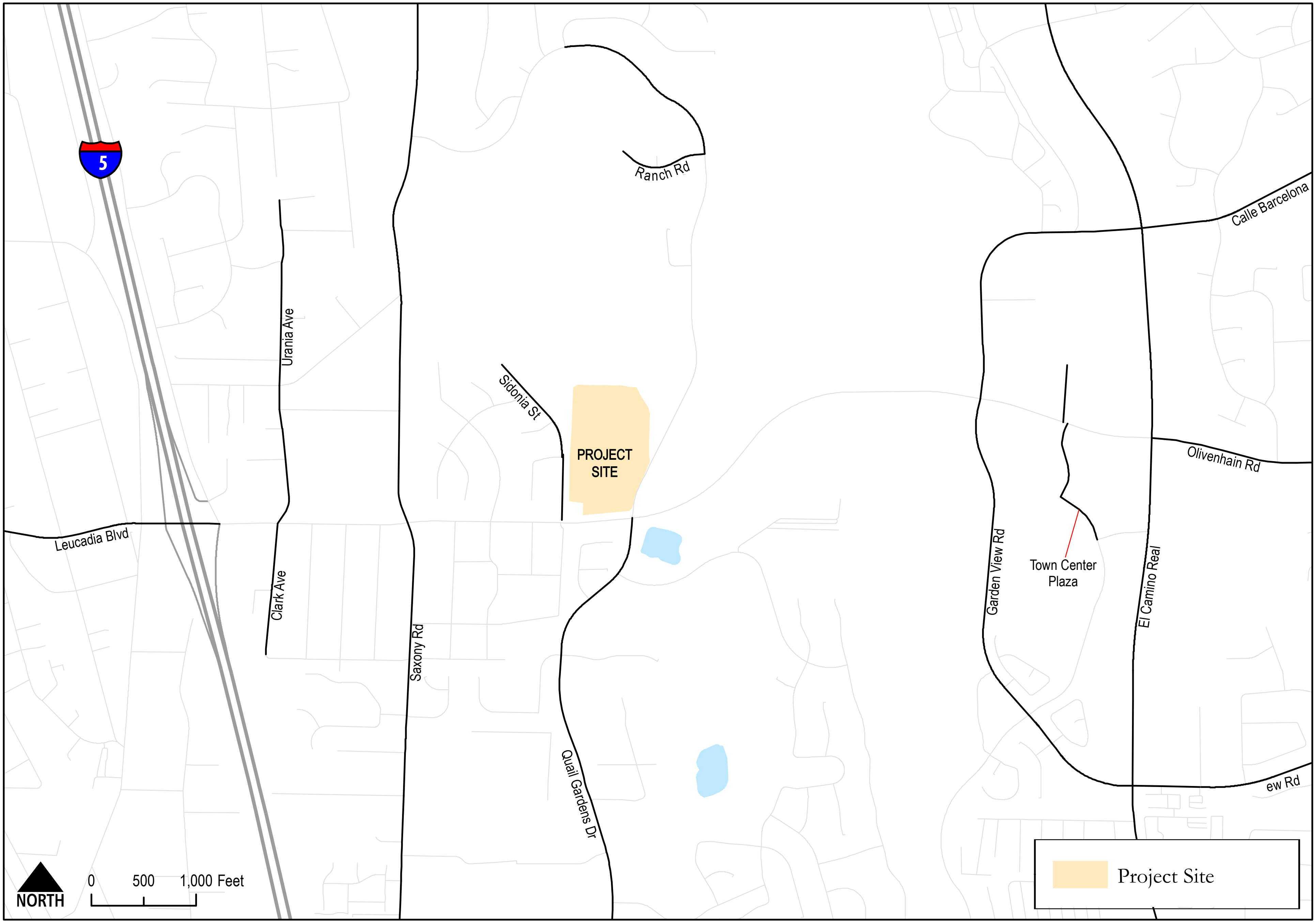
1.3 Report Organization

Following this Introduction chapter, this report is organized into the following sections:

2.0 *Analysis Methodology* – This chapter describes the methodologies and standards utilized to analyze and identify the transportation related impacts associated with the Proposed Project.

3.0 *Transportation Related Impacts and Mitigation* – This chapter derives and analyzes the projected Vehicle Miles Traveled (VMT) that will be generated by the Proposed Project. This chapter also identifies if the Proposed Project related VMT would create significant project related impact, as it relates to the standards outlined in the California Environmental Quality Act (CEQA). Finally, the chapter provides recommendations for mitigation measures to reduce the identified transportation related impacts to less than significant levels and evaluates the feasibility of the proposed mitigation measures.

[1] Pub. Resources Code, § 21064.3 ("'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").



Fox Point Farms in Encinitas
Transportation Impact Study
CHEN RYAN

Figure 1.3
Project Area

2.0 Analysis Methodology and Threshold

This VMT Assessment was conducted in accordance with the standards and requirements of the 2020 CEQA Statutes and Guidelines.

2.1 Background (SB-743)

On September 27, 2013, Governor Edmund G. Brown, Jr. signed SB-743 into law, starting a process that is expected to fundamentally change the way transportation impact analysis is conducted under CEQA. Within the State's CEQA Guidelines, these changes will include elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Lead agencies have until July 1, 2020 to comply with the updated CEQA revision.

2.2 Analysis Guidelines and Significance Thresholds

At this point in time, two SB-743 guidelines have been published that would be applicable to the City of Encinitas. The background for both guidelines is discussed below.

Office of Planning and Research – Technical Advisory on Evaluating Transportation Impacts in CEQA[2]

On December 2018, the Resources Agency certified and adopted the CEQA Guidelines update package, which included the California Natural Resources Agency Guidelines for the Implementation of the California Environmental Quality Act. As a result, the California Governor's Office of Planning and Research (OPR) updated and released the *Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory)* in December 2018.

The CEQA Guidelines recommend use of automobile VMT as the preferred CEQA transportation metric, along with the elimination of auto delay/LOS for CEQA purposes statewide. However, lead agencies have the discretion to select their preferred significance thresholds with respect to what level of VMT increase would cause a significant environmental impact. Lead agencies were provided the opportunity to use the thresholds suggested in the Technical Advisory or develop alternative thresholds.

Under the guidance suggested in the Technical Advisory, the VMT analysis can be conducted by comparing either project VMT/capita or VMT/employee to (1) the regional average, or (2) the average for the city or community in which the project is located. Per the Technical Advisory, if the project average VMT/capita or VMT/employee is lower than either (1) 85% of the regional average or (2) 85% of the average for the city or community in which the project is located, the VMT impacts of the project can be presumed less than significant.

For land use projects, such as the Proposed Project, the Technical Advisory reports that research has shown that automobile VMT/Capita at the project level should be fifteen percent (15%) below those of existing development (i.e., 85% of the existing average). A fifteen percent reduction is consistent with SB 743's direction to select a threshold that will help the State achieve its climate goals, including reducing GHG emissions associated with vehicular travel.

The Technical Advisory is provided in **Appendix A.**

2 http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

ITE – Guidelines for Transportation Impact Studies in The San Diego Region[3]

In response to the implementation of SB-743, the Institute of Transportation Engineers (ITE) San Diego section has prepared draft *Guidelines for Transportation Impact Studies in the San Diego Region, January 22, 2019* (*Regional TIS Guidelines*) as their transportation impact study guidelines and standards prior to the mandatory implementation of SB-743 (July 1, 2020). *The Regional TIS Guidelines* were developed by a committee of transportation engineers, both public agencies and private practitioners, currently operating within the San Diego Region, and were primarily based on the standards set forth in OPR's Technical Advisory. The intention of the guidelines is to address the new transportation analysis metrics and requirements, significance thresholds, and standards enacted by SB-743. The Regional TIS Guidelines were also developed to provide a consistent approach in the way transportation related impacts are analyzed, quantified, identified and mitigated within the San Diego Region. It is anticipated that many of the jurisdictions within the San Diego Region, such as the City of Encinitas, will adopt the Regional TIS Guidelines, or something similar, prior to the mandatory implementation of SB-743 on July 1, 2020.

The Regional TIS Guidelines is provided in **Appendix B.**

2.3 Analysis Methodology - CEQA

The following section describes the analysis methods outlined in both OPR's Technical Advisory and ITE's Regional TIS Guidelines in which transportation related impacts are analyzed and identified. Note that this section only provides a brief summary of information provided in both guidelines, a full copy of the guidelines has been included in Appendix A and B to provide additional detail, if needed.

2.3.1 Screening Criteria

OPR and ITE guidance recognize that small land use projects, which fall below certain screening thresholds, would not have a significant effect on VMT. **Table 2.1** displays the Average Daily Traffic (ADT) thresholds for land use development projects, as contained in the Technical Advisory and Regional TIS Guidelines. Projects that are below these thresholds are presumed to be less than significant. Also, as shown in Table 2.1, different levels of analysis are recommended by ITE based on the number of ADT generated by a land use project.

3 Source: *Institute of Transportation Engineers San Diego Section (ITE San Diego) Transportation Capacity and Mobility Task Force SB 743 Subcommittee*
https://static1.squarespace.com/static/5ab6b8a33e2d09b08935bcb1/t/5c521ddf21c67c7bc8ba547c/1548885476933/Draft+Guidelines+for+TIS+in+the+San+Diego+Region+1-22-19.pdf

Table 2.1 VMT Screening Criteria and Analysis Threshold

Guidelines	Consistent w/ General Plan?	ADT	Level of Analysis
OPR *Technical Advisory*	N/A	0 – 110	VMT Analysis Not Needed/VMT Impacts Presumed Less than Significant
	N/A	> 110	VMT analysis using the SANDAG Regional Model
ITE *Regional TIS Guidelines*	Consistent	0 - 1,000	VMT Analysis Not Needed/VMT Impacts Presumed Less than Significant
	Consistent	1,000 – 2,400	VMT analysis using the SANDAG VMT Calculation tool
	Consistent	> 2,400	VMT analysis using the SANDAG Regional Model
	Inconsistent	0 – 500	VMT Analysis Not Needed/VMT Impacts Presumed Less than Significant
	Inconsistent	500 – 2,400	VMT analysis using the SANDAG VMT Calculation tool
	Inconsistent	> 2,400	VMT analysis using the SANDAG Regional Model

Source: OPR *Technical Advisory* and *Regional TIS Guidelines*

As outlined in the table above, according to the Technical Advisory, any land use project that generates more than 110 ADT should conduct a VMT analysis.

Alternatively, according to the Regional TIS Guidelines, any project that generates less than 1,000 ADT, if consistent with the City's General Plan, or 500 if inconsistent with the City's General Plan, is not required to conduct a VMT analysis.

As to the level of analysis suggested under the ITE Regional TIS Guidelines, projects that generate greater than the minimum allowable ADT threshold (500 ADT or 1,000 ADT), but less than 2,400 ADT are required to conduct a VMT analysis using the SANDAG VMT calculation tool. Projects that generate more than 2,400 ADT are required to conduct a VMT analysis using the SANDAG Regional Model, regardless of whether or not the project is consistent with the General Plan.

2.3.2 Analysis Metrics

For land use development projects, the Technical Advisory and Regional TIS Guidelines require the following two metrics be analyzed to determine if a project has a significant transportation-related impact:

- *VMT/Capita*: Includes all vehicle-based person trips grouped and summed to the home location of individuals who are drivers or passengers on each trip. It includes both home-based and non-homebased trips. The VMT for each home is then summed for all homes in a particular census tract and divided by the population of that census tract to arrive at Resident VMT/Capita.

- *VMT/Employee*: Includes all vehicle-based person trips grouped and summed to the work location of individuals on the trip. This includes all trips, not just work-related trips. The VMT for each work location is then summed for all work locations in a particular census tract and then divided by the total number of employees of that census tract to arrive at the VMT/Employee.

2.3.3 Analysis Tools

The Technical Advisory and Regional TIS Guidelines recommend the following tools be used to project the VMT/Capita and the VMT/Employee that would be generated by land use development projects:

SANDAG Concept Map

The SANDAG Concept Map[4] provides regional and location specific (i.e. traffic analysis zones (TAZ)) VMT/Capita and VMT/Employee information using the Series13 Scenario 720 travel demand model. This map is to be used for residential and/or office land use projects that exceed the minimum thresholds (i.e. 110 based on OPR's Technical Advisory, and 1,000 ADT, if consistent with the City's General Plan, or 500 if inconsistent with the City's General Plan), but generate less than 2,400 ADT.

SANDAG Model

Both guidelines recommend using a Travel Demand Forecasting model to calculate the VMT/Capita and VMT/Employee of a land use model. The SANDAG Series 13 model is an Activity Based Model that simulates individual and household transportation decisions that compose their daily travel itinerary. People travel outside their home for activities such as work, school, shopping, healthcare, and recreation, and the ABM attempts to predict whether, where, when, and how this travel occurs, this process is called a tour. ABMs are particularly good at conducting VMT/Capita and VMT/Employee assessments because they can incorporate and evaluate Transportation Demand Management (TDM) policies, social equity, carpooling, transit access, parking conditions, tolling and pricing. Because an ABM tracks the characteristics of each person, the model can be used to analyze the travel patterns of a wide range of socioeconomic groups. For example, a household with many members may be more likely to carpool, own multiple vehicles, and share shopping responsibilities.

The SANDAG ABM includes a number of methodological strengths. It predicts the travel decisions of San Diego residents at a detailed level, taking into account the way people schedule their day, their behavioral patterns, and the need to cooperate with other household members. When simulating a person's travel patterns, the ABM takes into consideration a multitude of personal and household attributes like age, income, and gender. The model's fine temporal and spatial resolution ensures that it is able to capture subtle aspects of travel behavior.

As noted on page 5 of the OPR Technical Advisory:

> Tour- and trip-based approaches offer the best methods for assessing VMT from residential/office projects and for comparing those assessments to VMT thresholds. These approaches also offer the most straightforward methods for assessing VMT reductions from mitigation measures for residential/office projects. When available, tour-based assessment is ideal because it captures travel behavior more comprehensively. But where tour-based tools or data are not available for all components of an analysis, a trip-based assessment of VMT serves as a reasonable proxy.

The SANDAG Series 13 Model incorporates a tour-based approach when calculating and evaluating VMT. Therefore, based on the guidance presented above, as well as the recommendation contained in the *Region TIS Guidelines*, the SANDAG Series 13 Model was chosen as the most appropriate tool to evaluate the Proposed Project's VMT generation.

[4] VMT/Capita = http://sandag.github.io/sb743/sb743_concept_map.htm; VMT/Employee = http://sandag.github.io/sb743/sb743_concept_map_employee.htm

The OPR Technical Advisory states that the project's impact should be compared to existing development; therefore, the SANDAG Travel Demand Model's Base Year (2012) model should be used to analyze a projects' relative reduction in VMT. Alternatively, the Regional TIS Guidelines specifies for land use projects generating over 2,400 ADT, VMT/Capita and VMT/Employee analysis should be conducted using the SANDAG model using the latest SANDAG Regional Transportation Improvement Program (RTIP) year. The RTIP is a multi-billion-dollar, multi-year program of major transportation projects in the San Diego Region. Transportation projects funded with federal, state and TransNet (the San Diego transportation sales tax program managed by SANDAG) funds must be included in an approved RTIP. The RTIP covers five fiscal years and incrementally implements *San Diego Forward: The Regional Plan,* the long-range transportation plan for the San Diego region. At its meeting on September 28, 2018, the SANDAG Board of Directors adopted the final 2018 RTIP. As such, the current RTIP covers transportation projects up to the year 2023. On the other hand, the SANDAG Regional Transportation Model forecast years are for the years 2020, 2035, and 2050. Therefore, based on the Regional TIS Guidelines, the most appropriate year to conduct the VMT/Capita and VMT/Employee is the 2020.

To calculate VMT/Capita and VMT/Employee, project land uses must be coded into the Transportation Analysis Zone (TAZ) in which the project is located. A Select Zone assignment is then conducted for the project TAZ to track origin and destination pairings and routes to and from the project. The VMT for each home is then summed for all homes in the TAZ and divided by the population of that TAZ to arrive at Resident VMT/Capita. Similarly, the VMT for each employee is summed within the TAZ and then divided by the number of jobs.

A detailed description of how the SANDAG Model calculates VMT is provided at the following location:
https://www.sandag.org/uploads/2050RTP/F2050RTPTA15.pdf

2.4 Determination of Significance - CEQA

The CEQA Guidelines recommend use of automobile VMT as the preferred CEQA transportation metric, along with the elimination of auto delay/LOS. However, lead agencies have the discretion to select their preferred significance thresholds with respect to what level of VMT increase would cause a significant environmental impact. Lead agencies have the opportunity to choose the thresholds suggested in OPRs Technical Advisory or develop alternative thresholds. The analysis can be conducted by comparing either (1) the project VMT/capita or (2) the project VMT/employee to both (1) the San Diego regional average or (2) the average for the city or community in which the project is located.

Per the OPR Technical Advisory and the Regional TIS Guidelines, if the project average is lower than either 85% of the regional average or 85% of the average for the city or community in which the project is located, the VMT impacts of the project can be presumed less than significant. Since the City of Encinitas has not yet adopted an alternative threshold to demonstrate SB-743 guidelines, the VMT Assessment for the Proposed Project is analyzed against the following VMT thresholds to cover all potential geographical areas:

- Average VMT/Capita for the Region
- Average VMT/Capita for City of Encinitas
- Average VMT/Capita for North County[5]

[5] North County includes Oceanside, Carlsbad, Encinitas, Del Mar, Solana Beach, Escondido, San Marcos, Poway, and Vista

- Average VMT/Capita for Coastal Cities[6]

For both residential and employment-based land use developments, a project is considered to have a less than significant transportation related impact if the project VMT/Capita and VMT/Employee is lower than 85% of the regional average or 85% of the average for the area in which the project is located. The significance thresholds are shown in **Table 2.2**.

Table 2.2 Significance Thresholds

Land Use	Metric	Average VMT in miles[1]	Threshold[2]
San Diego Region			
Residential	VMT/Capita	17.6 (16.4)	15.0 (13.9)
Commercial	VMT/Employee	25.9 (24.9)	22.0 (21.2)
City of Encinitas			
Residential	VMT/Capita	20.8 (18.9)	17.7 (16.1)
Commercial	VMT/Employee	29.2 (27.4)	24.8 (23.3)
North San Diego County			
Residential	VMT/Capita	17.3 (15.9)	14.7 (13.5)
Commercial	VMT/Employee	25.6 (24.3)	21.2 (20.7)
Coastal Cities			
Residential	VMT/Capita	18.8 (17.6)	16.0 (15.0)
Commercial	VMT/Employee	26.0 (24.8)	22.1 (21.1)

Notes:
[1] Base Year Average (RTIP Year Average)
[2] OPR Technical Advisory recommends threshold is compared against 85% of the Base Year (2012) area average. Regional TIS Guidelines recommends threshold is compared against 85% of the RTIP Year (2020) area average. Significant impact occurs if the Project VMT/Capita or VMT/Employee is over the threshold.
Base Year Area Average (RTIP Year Area Average)

2.5 Cumulative Impacts

As stated on Page 6 of the OPR Technical Advisory:

> A project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).) When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impact analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance. (See Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 219, 223; CEQA Guidelines, § 15064, subd. (h)(3).)

[6] Coastal Cities includes Oceanside, Carlsbad, Encinitas, Del Mar, Solana Beach

As noted above, since the Proposed Project's transportation related impacts are being identified and evaluated based on both its anticipated VMT per capita or VMT per employee, its cumulative impacts are assumed be the same as it project impacts. Therefore, no additional cumulative analysis was conducted.

3.0 Transportation Impact & Mitigation

This chapter derives and analyzes the projected VMT generated by the Proposed Project. This chapter also identifies if the Proposed Project VMT would create a significant impact, as it relates to the standards outlined in the California Environmental Quality Act (CEQA) using the OPR *Technical Advisory* and Regional *TIS Guidelines*. Finally, the chapter provides recommendations for mitigation measures that may reduce the Proposed Project's impacts to less than significant levels and evaluates the feasibility of the proposed mitigation measures.

3.1 Determination of Analysis Method

As displayed in Table 2.1, the method used to derive and evaluate project VMT is determined based on a project's Trip Generation. Trip generation rates for the Proposed Project were developed utilizing SANDAG's *(not so) Brief Guide to Vehicular Trip Generation* (SANDAG, April 2002). **Table 3.1** displays daily project trip generation for the Proposed Project.

Table 3.1 Project Trip Generation

Land Use	Units	Trip Rate	ADT
Existing Land Uses			
Flower Mart[1]	18 acres	Driveway Count	-334
Proposed Land Uses			
Apartment	197 DU	6 / DU	1,182
Condominiums	53 DU	8 / DU	424
Restaurant	3,500 SF	100 / KSF	350
Open Space	5.5 acres	2 / acre	11
Farm Stand[2]	1,232 SF[2]	40 / KSF[3]	50
Nursery	0.07 acres	90 / acre	7
		SUB-TOTAL	2,024
		TOTAL	1,690

Source: SANDAG (not so) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002
Note:
[1] Based on driveway counts collected on a midweek day in October 2019.
[2] This is net square feet from the 3,213 gross square feet for farm stand.
[3] Garden nursery rate is also consistent with specialty retail/commercial retail trip generation.

As shown in Table 3.1, the Proposed Project is anticipated to generate a total of 2,024 daily trips (gross). However, the Proposed Project would also replace the existing 334 daily trips associated with the existing Dramm and Echter Flower-Mart; therefore, the Proposed Project's net increase is 1,690 ADT.

The Proposed Project is General Plan-consistent; however, based on the Technical Advisory and Regional TIS Guidelines, the Proposed Project does not fall below the ADT screening thresholds (identified in Table 2.1) of either 110 ADT or 1,000 ADT; therefore, a VMT/Capita and VMT/Employee analysis has been conducted using the SANDAG Series 13 Travel Demand Model.

3.2 VMT Impact Analysis

To calculate the average VMT/Capita and VMT/Employee generated by the Proposed Project, the Proposed Project land uses outlined in Table 3.1, were incorporated into the SANDAG Series 13 Travel Demand Models for the Base Year (2012) and RTIP Year (2020). A Select Zone assignment was conducted for the Proposed Project Transportation Analysis Zone (TAZ) which tracked and calculated the Proposed Project

VMT by user type. VMT Analysis Results. The results of the Select Zone assignment are provided in **Table 3.2**. Model output results are presented in **Appendix C**.

As to residential uses, the Proposed Project's residential uses are anticipated to generate a VMT/Capita of 21.1 miles during the Base Year (2012) and 18.7 miles during the RTIP Year (2020), which exceeds the 85% significance threshold for all geographical areas (i.e. Region, City of Encinitas, North County, and Coastal Cities). As to commercial uses, the Proposed Project's restaurant uses are anticipated to generate a VMT/Capita of 28.8 miles during the Base Year and 27.6 miles during the RTIP Year (2020), which exceeds the 85% significance threshold for all area averages (i.e. Region, City of Encinitas, North County, and Coastal Cities). Therefore, the Proposed Project would have a potentially significant VMT-related transportation impact.

The Proposed Project's VMT/Capita and VMT/Employee are not anticipated to fall under the significance threshold as it is located in a suburban area that include single family homes with higher automobile ownership, when compared to the region, which could result in further travel demands for jobs, education, and extracurricular activity. However, the Proposed Project's uses are not quite consistent with this characteristic as it includes mulit-family residential and affordable housing units with some commercial uses to give it a mixed-use effect. These components may have a lower VMT than a typical single-family residential neighborhood. Consequently, the model could be estimating a higher VMT for the Proposed Project because it is assuming the travel patterns of the surrounding single-family neighborhood.

Additionally, it is important to note the limitations of the SANDAG model and its ability to capture project features that could reduce the Proposed Project's VMT (as specified in Table 3.2). SANDAG's Travel Demand Model is built at the regional level, making it limited to capture all the nuances of individual project sites, such as benefits of small mixed uses, affordable housing components, or the proposed travel demand management measures that will be provided by the Proposed Project.

Table 3.2 VMT Results Impact Analysis

Metric	Proposed Project	Region Average	Project % of Region Average	SI?[1]	Encinitas Average	Project % of Encinitas Average	SI?[1]	North County Average	Project % of N. County Average	SI?[1]	Coastal Cities Average	Project % of Coastal. Cities Average	SI?[1]
Base Year (2012)													
VMT/ Capita	21.1	17.6	119.9%	Y	20.8	101.4%	Y	17.3	122.0%	Y	18.8	112.2%	Y
VMT/ Employee	28.8	25.9	111.2%	Y	29.2	98.6%	Y	25.6	112.5%	Y	26.0	110.8%	Y
RTIP Year (2020)													
VMT/ Capita	18.7	16.4	114.0%	Y	18.9	98.9%	Y	15.9	117.6%	Y	17.6	106.3%	Y
VMT/ Employee	27.6	24.9	110.8%	Y	27.4	100.7%	Y	24.3	113.6%	Y	24.8	111.3%	Y

Source: SANDAG Regional Transportation Model, July 2019

Notes:
[1] Significant Impact if greater than 85% (See Section 2.4). N = No, Y = Yes

3.3 Mitigation

As noted in section 3.2, both the residential and restaurant uses within the Proposed Project would have a potentially significant VMT-related transportation impact. To reduce the VMT/Capita and VMT/Employee associated with the Proposed Project to a less than significant level, VMT reducing measures would need to be implemented to reduce project related VMT below the significance threshold. Therefore, a Transportation Demand Management (TDM) analysis was conducted using the *California Air Pollution Control Officers Associates (CAPCOA) resource document "Quantifying Greenhouse Gas Mitigation Measures", August 2010* (CAPCOA Report) to provide an understanding of the types and magnitude of TDM related features the Proposed Project would need to implement to reduce Proposed Project VMT to less than significant levels.

Chapter 7 of the CAPCOA report provides a series of Fact Sheets that outline the relevant literature used to develop the strategy, how and where the strategy is applicable, the method to apply the strategy, and sample calculations. The CAPCOA Report provides caps limiting the total VMT reductions that are allowed for each individual strategy, or category of strategies, or as a total project site. To quantify the potential reduction in project generated VMT, the VMT based reduction strategies were applied to the relevant features contained in the proposed project's design and TDM plan. The relevant CAPCOA Fact Sheets used in this analysis is included in **Appendix D.**

The Proposed Project plans to implement a robust TDM program to help reduce the project's VMT. The TDM program is organized in the following three (3) strategy types:

<u>Land Use Strategies</u>

- "Mix of Uses" - The proposed project would provide a mix of land uses, including residential, commercial and recreational uses, so that residents of the proposed project have access to basic amenities without having to travel outside of the project site. This proximity would lower vehicle miles traveled because residents can use non-automobile transportation modes to reach the various uses available within the site.
- "Affordable Housing" - The proposed project will provide 39 very-low income affordable housing units, which provide greater opportunity for lower income families to live closer to jobs centers and achieve jobs/housing match near transit, and allow a greater number of families to be accommodated within a given building footprint.

Travel and Commute Services for Residents and Employees

These strategies will provide residents with travel options other than private auto for trips to destinations outside of the Project area:

<u>Neighborhood/Site Enhancements</u>

- "Pedestrian Connections" - The proposed project will develop a pedestrian network that provides accommodations on-site as well as convenient pedestrian access to Leucadia Boulevard and Quail Gardens Drive.
- "E-Bike Share" - The proposed project will implement an electric bike share program to link to local Encinitas destinations and reduce motorized vehicle trips. The electric bike share program would provide for the availability of 10 electric bikes for the exclusive use of project residents to provide sustainable transportation as a substitute for individual vehicle ownership/use. In addition to the E-Bike program, high quality bike parking would be provided for project residents.

- "Multi-use Trail" – The proposed project site plan also includes a multi-use path that loops the site. Multi-use trails and paths comprise a total of nearly two miles within the site.
- "Car share dedicated parking" – Two dedicated parking spaces west of the community recreation center to accommodate car sharing opportunities will be established.

<u>Commute Trip Reduction Strategies</u>

- "Business Center" - The Project will include a resident business center in the community recreation center with Wi-Fi access for residents, printers/scanners, and other office amenities to enable residents to work remotely rather than commuting to work.
- "TDM Marketing Program" –
    - The Project will promote and advertise various transportation options, including promoting information and resources regarding SANDAG's iCommute program, which provides support to commuters through a variety of TDM measures, such as carpool matching services, vanpool, and other services.
    - The Project will promote formal and/or informal networks among residents for carpool/ vanpool purposes.
    - Promote available websites providing transportation options for residents.
    - Create and distribute a "new resident" information packet addressing alternative modes of transportation.
- "School Pool" - The Project will coordinate and implement a "school pool" program for project students.
- "Transit Passes Subsidies" – NCTD Regional Transit passes will be offered to the 20 on-site employees as an alternative to parking at the project site.

3.4 TDM Program Effectiveness

The CAPCOA standards were used to derive the VMT reduction anticipated to be achieved by implementation of the TDM program strategies. Each of those strategies and their respective VMT reduction percentages are described in detail below.

Land Use Strategies

<u>Land Use Diversity</u>

The TDM Program's land use diversity benefits are incorporated into the trip generation rates developed for the proposed project; in order to ensure that their benefits are not double-counted, land use diversity is not considered here. However, the mix of uses plays a critical role in many of the reductions calculate below.

<u>Affordable Housing</u>

Affordable housing provides a greater opportunity for lower-income families to live closer to job centers and achieve job/housing matches near transit, and also allows a greater number of families to be accommodated within a given building footprint. Those who live in affordable housing have lower levels of auto ownership, making them more likely to use alternative modes of transportation for their commutes.

The CAPCOA Report provides the following equation to calculate the VMT reduction percentage associated with affordable housing:

*% VMT Reduction = (4% reduction in vehicle trips per affordable unit) * (% of project units that are affordable)*

Of the 250 planned units at Fox Point Farms, 39 are proposed as affordable, resulting in a 15.6% proportion of affordable units (39 affordable units/250 total units = 22%). Applying the CAPCOA formula, this mix results in a VMT reduction of approximately **0.6%** (= 4% * 15.6%).

Neighborhood Site Enhancements

Pedestrian Network Connections

Network improvements include the development of a pedestrian network that provides accommodations on site, as well as convenient pedestrian access to Leucadia Boulevard on the south side of the Project site. This encourages people to walk instead of drive by minimizing barriers to pedestrian access and interconnectivity. CAPCOA estimates a VMT reduction of 0-2% based on the land use context and the extent of pedestrian accommodations.

Given the suburban context of the Project and the facilities provided both on site as well as connections off site, CAPCOA would indicate a 0% - 2% reduction. Because the area surrounding the project site does not include any nearby pedestrian destinations, and accordingly a VMT reduction of approximately **1%** is considered appropriate.

Electric Bike Sharing Program

Electric bike sharing provides residents the option of biking to and from their destinations instead of driving. The electric motor allows for longer travel and travel on steeper inclines than a standard bicycle would comfortably allow. Placed appropriately throughout the development, electric bikes would provide further support for the existing bike network as more people would have access to bicycles.

While CAPCOA does not attribute VMT reductions to bike sharing programs specifically (CAPCOA TRT-12), CAPCOA does address VMT reductions related to providing a Neighborhood Electric Vehicle (NEV) Network (CAPCOA SDT-3). In this case, the Fox Point Farms electric bike share program would combine a bike share program with electric bikes, which is a type of electric vehicle akin to the NEV program considered by CAPCOA.

CAPCOA recognizes a VMT reduction attributable to NEV use and ownership that also includes a travel network to accommodate NEV use, including features such as charging facilities, striping, signage, and educational tools (CAPCOA SDT-3). The forecast VMT reductions are calculated based on market penetration levels (i.e., percent of households with access to a NEV) and an average reduction in total VMT per NEV household of 12.7%. According to CAPCOA, the following is the equation to be applied in determining VMT reduction for an electric vehicle network:

*% VMT Reduction = (Percent Market Penetration * 12.7%)*

Fox Point Farms proposes to provide 10 electric bicycles; therefore, there would be 1 electric bicycle per 25 households (250 households / 10 bicycles = 25 households per bicycle) or a 0.04

market penetration rate (10 bicycles / 250 households = 0.04). Under the CAPCOA NEV formula, this would result in a VMT reduction of approximately **0.5%** (0.04 * 12.7% = 0.53%).

Car Share Service Accommodations
The dedication of on-site parking spaces for car share services does not have any specific associated VMT reductions; however, it does assist with commute trip reductions described below.

Commute Trip Reduction Strategies

Business Center
Establishing an on-site business center for project residents does not have a specific VMT reduction associated with such a program; however, it would support home-based work by providing Wi-Fi, printer/ scanner, and other office amenities.

TDM Marketing Program
To ensure that residents are aware of all alternative transportation mode options available, "new resident" information packets will be distributed to all new residents. A website also will be created with the same information so that this information is always accessible. These sources will include information regarding the bike-share kiosks, iCommute, transit and all other alternative transportation options.

The continued expansion and utilization of iCommute, SANDAG's TDM Program, would also support the successful dispensation of transportation choice information. Using "new resident" information packets, a transportation information website, and iCommute to dispense transportation information falls under CAPCOA standard TRT-7: Commute Trip Reduction Marketing. This strategy focuses on reducing the commute trips of the residents of Fox Point Farms. The CAPCOA Report provides the following equation to calculate the VMT reduction percentage associated with TDM program marketing:

*% VMT Reduction = (% reduction in commute trips) * (% population eligible) * (adjustment from commute VT (vehicle trips) to VMT) * (% home-based work VMT)*

% reduction in vehicle trips = 4% (CAPCOA page 241)
% population eligible = 50% (CAPCOA suggests an eligibility rate of 20-100%; for Fox Point Farms, 50% is used)
Adjustment from VT to VMT = 1.0 (CAPCOA page 241)
% home-based work VMT = 25%

*% VMT Reduction = 4% * 50% * 1.0 * 25% = 0.5%*

By utilizing progressive and effective strategies to spread information, implementation of a TDM marketing program is expected to result in a **0.5%** VMT reduction.

Carpool and Vanpool Support
Promoting both new and existing rideshare options to residents reduces single-occupancy vehicle trips and associated VMT. The CAPCOA Report identifies the establishment of ridesharing programs

(CAPCOA TRT-3) as reducing VMT by increasing carpooling and vanpooling. Expanding iCommute, the TDM Program for the San Diego region (operated by SANDAG and the 511 Transportation Information Service) also would contribute to VMT reductions. iCommute assists users in setting up carpools and vanpools, planning transit trips, and promoting alternative mode choices, such as biking. Expanding this service to the Fox Point Farms development area would make it more convenient for residents to use alternative modes of transportation.

While the TDM Program marketing measure also referred to promoting iCommute, the reduction captured by marketing relates to increased awareness of alternative commute options and available resources. In contrast, the reduction captured by the carpool and vanpool support measures relates to the availability of each rideshare program. While iCommute provides information about commute options and available resources, it also provides both carpool and vanpool matching services. Promoting iCommute would provide Fox Point Farms residents with all described services. Each of these TDM strategies is distinct with its own VMT reduction attributes.

As to the project site, which is designated as Suburban in context, VMT reduction is calculated based on CAPCOA standards TRT-3 and TRT-11. The TRT-3 strategy is only applicable to homebased work VMT generated by the Proposed Project site. The focus of this standard is to reduce commute trips for residents through promoting iCommute. The following is the CAPCOA equation to calculate the VMT reduction attributable to ridesharing support features:

*% VMT Reduction = (% reduction in commute VMT) * (% employees eligible) * (% homebased work VMT)*

% reduction in commute VMT = 5% (CAPCOA page 228)
% employees eligible = 20% (CAPCOA suggests an eligibility rate of 20-100%; 20% is used to be conservative)
% home-based work VMT = 25%

*% VMT Reduction = 5% * 20% * 25% = 0.25%*

Based on the projected population demographics and development characteristics of the Fox Point Farms Project, a 0.25% VMT reduction is estimated to result from promoting iCommute's carpool support program.

The TRT-11 strategy is intended for employer-sponsored vanpool programs. However, similar to the calculation above, commute trips for residents could be reduced through promoting iCommute. The following is the CAPCOA equation to calculate the VMT reduction attributable to the vanpool program.

*% VMT Reduction = (% shift in vanpool mode share of commute trips) * (% employees eligible) * (adjustments from vanpool mode share to commute VMT) * (% home-based work VMT)*

% shift in vanpool mode share = 5% (CAPCOA suggests a range of 2-20%; 5% is used to be conservative)
% employees eligible = 20% (CAPCOA suggests an eligibility rate of 20-100%; 20% is used to be conservative)

Adjustments from vanpool mode share to commute VMT = 0.67 (CAPCOA page 254)
% home-based work VMT = 25%

*% VMT Reduction = 5% * 20% * 0.67 * 25% = 0.17%*

Based on the projected population demographics and development characteristics of the Fox Point Farms Project, a 0.17% VMT reduction is estimated to result from promoting iCommute's vanpool support program, which is distinct from the other iCommute strategies as stated above and, therefore, results in VMT reductions additional to the other strategies.

The combined reduction of both programs is calculated by multiplying the reductions, resulting in a combined **0.42%** reduction (1 - (1 - 0.25%) * (1 - 0.17%) = 0.42%).

<u>School Pool Support</u>
CAPCOA TRT-10 states that the implementation of a school pool program involves the coordination and planning of parents to transport students to off-site public or private schools, or to schools where students cannot walk or bike but do not meet the requirements for bussing. The degree to which the school pool program would reduce school VMT (i.e., those vehicles miles generated by student travel to and from a school) ranges from 7.2% to 15.8%, depending on the number of families participating in the program. The range of family participation in a school pool program according to CAPCOA TRT-10 is between 16% and 35%. Based on the CAPCOA methodology, the reduction in school VMT after the implementation of a school pool program is calculated as follows:

*% Reduction in School VMT = participation rate of families * 45% (CAPCOA TRT-10 adjustment to convert from participation to daily VMT to annual school VMT) * % of home-based school VMT*

Participation rate of families = 16% (CAPCOA TRT-10 indicates that typical participation rates are 16-35%; for a moderate implementation 16% is suggested)
% of home-based school VMT outside the Project site = 10%

*%VMT Reduction = 16% * 45% * 10% = 0.7%*

Based on this methodology provided by CAPCOA and the calculations, the calculated VMT reduction for the implementation of a school pool program is **0.7%**, the percentage which has been applied to the overall VMT reduction calculation.

Transit Pass Subsidies
CAPCOA associates certain levels of transit fare subsidies with levels of employee commuter participation (CAPCOA TRT-4). For a subsidy of $2.98 per person per day incentives 16.4% reduction in commute VMT.

The CAPCOA report provides the following formula for calculating the percent VMT reduction associated with employee transit fare subsidies of $2.98 per person per day:

*% VMT Reduction = (16.4% reduction in commute vehicle trips) *(100% employees eligible) * (adjustment from commute vehicle trips to overall VMT) * (25% home-based work VMT)*

*% VMT Reduction = 16.4% * 100% * 1% * 25% = 4.1%*

Based on this methodology provided by CAPCOA and the calculations, the calculated VMT reduction for the implementation of Transit Pass Subsides is **4.1%**, the percentage which has been applied to the overall VMT reduction calculation.

3.4.1 Proposed Project Impacts

When determining the overall VMT reduction associated with the project, the VMT reduction for each individual strategy should be dampened, which is adjusted to reflect that some of the strategies of the strategies may be redundant or applicable to the same populations. Consequently, the total VMT reduction that would be associated with these measures would be 4.1% for employment related VMT and 1.0% for residential related VMT. **Table 3.3** summarizes the reduction percentages needed to reduce the Proposed Project's VMT/Capita and its VMT/Employee to less-than-significant.

Table 3.3 VMT Percentage Reduction Requirements by Geographical Area

Metric	Proposed Project's TDM VMT Reduction	Geographical Area: Region Average %	Mit?[1]	City of Encinitas %	Mit?	North County %	Mit?	Coastal Cities %	Mit?
Base Year (2012)									
VMT/ Capita	1.0%	40.7%	N	19.2%	N	43.5%	N	31.9%	N
VMT/ Employee	4.1%	30.9%	N	16.1%	N	32.1%	N	30.3%	N
RTIP Year (2020)									
VMT/ Capita	1.0%	34.5%	N	16.1%	N	38.5%	N	24.7%	N
VMT/ Employee	4.1%	30.9%	N	18.5%	N	33.3%	N	30.8%	N

Note:
[1] Mit? = Mitigated?; N = No, Y = Yes

As shown, the implementation of these TDM measures would not reduce the project related impact to less than significance. Therefore, the Proposed Project would still have significant and unavoidable transportation related impact for CEQA purposes since no feasible mitigation measures could be identified.

Appendix A
OPR Technical Advisory

TECHNICAL ADVISORY

ON EVALUATING TRANSPORTATION IMPACTS IN CEQA

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE OF CALIFORNIA

December 2018

Contents

A. Introduction

This technical advisory is one in a series of advisories provided by the Governor's Office of Planning and Research (OPR) as a service to professional planners, land use officials, and CEQA practitioners. OPR issues technical assistance on issues that broadly affect the practice of land use planning and the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). (Gov. Code, § 65040, subds. (g), (l), (m).) The purpose of this document is to provide advice and recommendations, which agencies and other entities may use at their discretion. This document does not alter lead agency discretion in preparing environmental documents subject to CEQA. This document should not be construed as legal advice.

Senate Bill 743 (Steinberg, 2013), which was codified in Public Resources Code section 21099, required changes to the guidelines implementing CEQA (CEQA Guidelines) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. As one appellate court recently explained: "During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy . . . ." (*Covina Residents for Responsible Development v. City of Covina* (2018) 21 Cal.App.5th 712, 729.) Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (*Id.*, subd. (b)(1); see generally, adopted CEQA Guidelines, § 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (Agency) has certified and adopted, changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. With the California Natural Resources Agency's certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by "level of service" and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).)

This advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. Again, OPR provides this Technical Advisory as a resource for the public to use at their discretion. OPR is not enforcing or attempting to enforce any part of the recommendations contained herein. (Gov. Code, § 65035 ["It is not the intent of the Legislature to vest in the Office of Planning and Research any direct operating or regulatory powers over land use, public works, or other state, regional, or local projects or programs."].)

This December 2018 technical advisory is an update to the advisory it published in April 2018. OPR will continue to monitor implementation of these new provisions and may update or supplement this advisory in response to new information and advancements in modeling and methods.

B. Background

VMT and Greenhouse Gas Emissions Reduction. Senate Bill 32 (Pavley, 2016) requires California to reduce greenhouse gas (GHG) emissions 40 percent below 1990 levels by 2030, and Executive Order B-16-12 provides a target of 80 percent below 1990 emissions levels for the transportation sector by 2050. The transportation sector has three major means of reducing GHG emissions: increasing vehicle efficiency, reducing fuel carbon content, and reducing the amount of vehicle travel. The California Air Resources Board (CARB) has provided a path forward for achieving these emissions reductions from the transportation sector in its 2016 Mobile Source Strategy. CARB determined that it will not be possible to achieve the State's 2030 and post-2030 emissions goals without reducing VMT growth. Further, in its 2018 Progress Report on California's Sustainable Communities and Climate Protection Act, CARB found that despite the State meeting its 2020 climate goals, "emissions from statewide passenger vehicle travel per capita [have been] increasing and going in the wrong direction," and "California cannot meet its [long-term] climate goals without curbing growth in single-occupancy vehicle activity."[1] CARB also found that "[w]ith emissions from the transportation sector continuing to rise despite increases in fuel efficiency and decreases in the carbon content of fuel, California will not achieve the necessary greenhouse gas emissions reductions to meet mandates for 2030 and beyond without significant changes to how communities and transportation systems are planned, funded, and built."[2]

Thus, to achieve the State's long-term climate goals, California needs to reduce per capita VMT. This can occur under CEQA through VMT mitigation. Half of California's GHG emissions come from the transportation sector[3], therefore, reducing VMT is an effective climate strategy, which can also result in co-benefits.[4] Furthermore, without early VMT mitigation, the state may follow a path that meets GHG targets in the early years, but finds itself poorly positioned to meet more stringent targets later. For example, in absence of VMT analysis and mitigation in CEQA, lead agencies might rely upon verifiable offsets for GHG mitigation, ignoring the longer-term climate change impacts resulting from land use development and infrastructure investment decisions. As stated in CARB's 2017 Scoping Plan:

> "California's future climate strategy will require increased focus on integrated land use planning to support livable, transit-connected communities, and conservation of agricultural and other lands. Accommodating population and economic growth through travel- and energy-efficient land use provides GHG-efficient growth, reducing GHGs from both transportation and building energy use. GHGs can be further reduced at the project level through implementing energy-efficient construction and travel demand management approaches."[5] (*Id.* at p. 102.)

---

[1] California Air Resources Board (Nov. 2018) *2018 Progress Report on California's Sustainable Communities and Climate Protection Act*, pp. 4, 5, available at https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf.
[2] *Id.*, p. 28.
[3] See https://ca50million.ca.gov/transportation/
[4] Fang et al. (2017) *Cutting Greenhouse Gas Emissions Is Only the Beginning: A Literature Review of the Co-Benefits of Reducing Vehicle Miles Traveled*.
[5] California Air Resources Board (Nov. 2017) *California's 2017 Climate Change Scoping Plan*, p. 102, available at https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

In light of this, the 2017 Scoping Plan describes and quantifies VMT reductions needed to achieve our long-term GHG emissions reduction goals, and specifically points to the need for statewide deployment of the VMT metric in CEQA:

> "Employing VMT as the metric of transportation impact statewide will help to ensure GHG reductions planned under SB 375 will be achieved through on-the-ground development, and will also play an important role in creating the additional GHG reductions needed beyond SB 375 across the State. Implementation of this change will rely, in part, on local land use decisions to reduce GHG emissions associated with the transportation sector, both at the project level, and in long-term plans (including general plans, climate action plans, specific plans, and transportation plans) and supporting sustainable community strategies developed under SB 375."[6]

VMT and Other Impacts to Health and Environment. VMT mitigation also creates substantial benefits (sometimes characterized as "co-benefits" to GHG reduction) in both in the near-term and the long-term. Beyond GHG emissions, increases in VMT also impact human health and the natural environment. Human health is impacted as increases in vehicle travel lead to more vehicle crashes, poorer air quality, increases in chronic diseases associated with reduced physical activity, and worse mental health. Increases in vehicle travel also negatively affect other road users, including pedestrians, cyclists, other motorists, and many transit users. The natural environment is impacted as higher VMT leads to more collisions with wildlife and fragments habitat. Additionally, development that leads to more vehicle travel also tends to consume more energy, water, and open space (including farmland and sensitive habitat). This increase in impermeable surfaces raises the flood risk and pollutant transport into waterways.[7]

VMT and Economic Growth. While it was previously believed that VMT growth was a necessary component of economic growth, data from the past two decades shows that economic growth is possible without a concomitant increase in VMT. (Figure 1.) Recent research shows that requiring development projects to mitigate LOS may actually reduce accessibility to destinations and impede economic growth.[8,9]

---

[6] *Id.* at p. 76.

[7] Fang et al. (2017) *Cutting Greenhouse Gas Emissions Is Only the Beginning: A Literature Review of the Co-Benefits of Reducing Vehicle Miles Traveled*, available at https://ncst.ucdavis.edu/wp-content/uploads/2017/03/NCST-VMT-Co-Benefits-White-Paper_Fang_March-2017.pdf.

[8] Haynes et al. (Sept. 2015) *Congested Development: A Study of Traffic Delays, Access, and Economic Activity in Metropolitan Los Angeles*, available at http://www.its.ucla.edu/wp-content/uploads/sites/6/2015/11/Haynes_Congested-Development_1-Oct-2015_final.pdf.

[9] Osman et al. (Mar. 2016) *Not So Fast: A Study of Traffic Delays, Access, and Economic Activity in the San Francisco Bay Area*, available at http://www.its.ucla.edu/wp-content/uploads/sites/6/2016/08/Taylor-Not-so-Fast-04-01-2016_final.pdf.

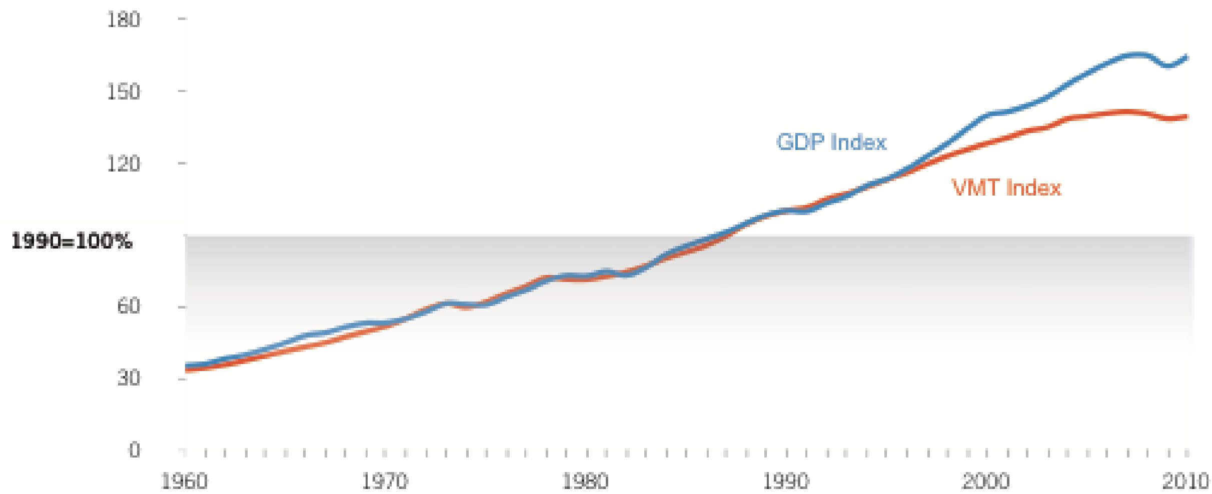


Figure 1. Kooshian and Winkelman (2011) *VMT and Gross Domestic Product (GDP), 1960-2010*.

C. Technical Considerations in Assessing Vehicle Miles Traveled

Many practitioners are familiar with accounting for VMT in connection with long-range planning, or as part of the CEQA analysis of a project's greenhouse gas emissions or energy impacts. This document provides technical information on how to assess VMT as part of a transportation impacts analysis under CEQA. Appendix 1 provides a description of which VMT to count and options on how to count it. Appendix 2 provides information on induced travel resulting from roadway capacity projects, including the mechanisms giving rise to induced travel, the research quantifying it, and information on additional approaches for assessing it.

1. Recommendations Regarding Methodology

Proposed Section 15064.3 explains that a "lead agency may use models to estimate a project's vehicle miles traveled . . . ." CEQA generally defers to lead agencies on the choice of methodology to analyze impacts. (*Santa Monica Baykeeper v. City of Malibu* (2011) 193 Cal.App.4th 1538, 1546; see *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 409 ["the issue is not whether the studies are irrefutable or whether they could have been better" … rather, the "relevant issue is only whether the studies are sufficiently credible to be considered" as part of the lead agency's overall evaluation].) This section provides suggestions to lead agencies regarding methodologies to analyze VMT associated with a project.

Vehicle Types. Proposed Section 15064.3, subdivision (a), states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT). For an apples-to-apples comparison, vehicle types considered should be consistent across project assessment, significance thresholds, and mitigation.

Residential and Office Projects. Tour- and trip-based approaches[10] offer the best methods for assessing VMT from residential/office projects and for comparing those assessments to VMT thresholds. These approaches also offer the most straightforward methods for assessing VMT reductions from mitigation measures for residential/office projects. When available, tour-based assessment is ideal because it captures travel behavior more comprehensively. But where tour-based tools or data are not available for all components of an analysis, a trip-based assessment of VMT serves as a reasonable proxy.

Models and methodologies used to calculate thresholds, estimate project VMT, and estimate VMT reduction due to mitigation should be comparable. For example:

- A tour-based assessment of project VMT should be compared to a tour-based threshold, or a trip-based assessment to a trip-based VMT threshold.
- Where a travel demand model is used to determine thresholds, the same model should also be used to provide trip lengths as part of assessing project VMT.
- Where only trip-based estimates of VMT reduction from mitigation are available, a trip-based threshold should be used, and project VMT should be assessed in a trip-based manner.

When a trip-based method is used to analyze a residential project, the focus can be on home-based trips. Similarly, when a trip-based method is used to analyze an office project, the focus can be on home-based work trips.

When tour-based models are used to analyze an office project, either employee work tour VMT or VMT from all employee tours may be attributed to the project. This is because workplace location influences overall travel. For consistency, the significance threshold should be based on the same metric: either employee work tour VMT or VMT from all employee tours.

For office projects that feature a customer component, such as a government office that serves the public, a lead agency can analyze the customer VMT component of the project using the methodology for retail development (see below).

Retail Projects. Generally, lead agencies should analyze the effects of a retail project by assessing the change in total VMT[11] because retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns.

[10] See Appendix 1, *Considerations About Which VMT to Count,* for a description of these approaches.
[11] See Appendix 1, *Considerations About Which VMT to Count, "*Assessing Change in Total VMT" section, for a description of this approach.

Considerations for All Projects. Lead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries, for example, by failing to count the portion of a trip that falls outside the jurisdiction or by discounting the VMT from a trip that crosses a jurisdictional boundary. CEQA requires environmental analyses to reflect a "good faith effort at full disclosure." (CEQA Guidelines, § 15151.) Thus, where methodologies exist that can estimate the full extent of vehicle travel from a project, the lead agency should apply them to do so. Where those VMT effects will grow over time, analyses should consider both a project's short-term and long-term effects on VMT.

Combining land uses for VMT analysis is not recommended. Different land uses generate different amounts of VMT, so the outcome of such an analysis could depend more on the mix of uses than on their travel efficiency. As a result, it could be difficult or impossible for a lead agency to connect a significance threshold with an environmental policy objective (such as a target set by law), inhibiting the CEQA imperative of identifying a project's significant impacts and providing mitigation where feasible. Combining land uses for a VMT analysis could streamline certain mixes of uses in a manner disconnected from policy objectives or environmental outcomes. Instead, OPR recommends analyzing each use separately, or simply focusing analysis on the dominant use, and comparing each result to the appropriate threshold. Recommendations for methods of analysis and thresholds are provided below. In the analysis of each use, a mixed-use project should take credit for internal capture.

Any project that includes in its geographic bounds a portion of an existing or planned Transit Priority Area (i.e., the project is within a ½ mile of an existing or planned major transit stop or an existing stop along a high quality transit corridor) may employ VMT as its primary metric of transportation impact for the entire project. (See Pub. Resources Code, § 21099, subds. (a)(7), (b)(1).)

Cumulative Impacts. A project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).) When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance. (See *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 219, 223; CEQA Guidelines, § 15064, subd. (h)(3).)

D. General Principles to Guide Consideration of VMT

SB 743 directs OPR to establish specific "criteria for determining the significance of transportation impacts of projects[.]" (Pub. Resources Code, § 21099, subd. (b)(1).) In establishing this criterion, OPR was guided by the general principles contained within CEQA, the CEQA Guidelines, and applicable case law.

To assist in the determination of significance, many lead agencies rely on "thresholds of significance." The CEQA Guidelines define a "threshold of significance" to mean "an identifiable **quantitative, qualitative**[12] **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." (CEQA Guidelines, § 15064.7, subd. (a) (emphasis added).) Lead agencies have discretion to develop and adopt their own, or rely on thresholds recommended by other agencies, "provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." (*Id*. at subd. (c); *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) Substantial evidence means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." (*Id*. at § 15384 (emphasis added); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-1109.)

Additionally, the analysis leading to the determination of significance need not be perfect. The CEQA Guidelines describe the standard for adequacy of environmental analyses:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to **make a decision which intelligently takes account of environmental consequences**. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is **reasonably feasible**. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The **courts have looked not for perfection** but for **adequacy**, **completeness**, and a **good faith effort** at full disclosure.

(CEQA Guidelines, § 15151 (emphasis added).)

These general principles guide OPR's recommendations regarding thresholds of significance for VMT set forth below.

[12] Generally, qualitative analyses should only be conducted when methods do not exist for undertaking a quantitative analysis.

E. Recommendations Regarding Significance Thresholds

As noted above, lead agencies have the discretion to set or apply their own thresholds of significance. (*Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 218-223 [lead agency had discretion to use compliance with AB 32's emissions goals as a significance threshold]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th at p. 1068.) However, Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. It further directed OPR to prepare and develop criteria for determining significance. (Pub. Resources Code, § 21099, subd. (b)(1).) This section provides OPR's suggested thresholds, as well as considerations for lead agencies that choose to adopt their own

The VMT metric can support the three statutory goals: "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, *and* a diversity of land uses." (Pub. Resources Code, § 21099, subd. (b)(1), emphasis added.) However, in order for it to promote and support all three, lead agencies should select a significance threshold that aligns with state law on all three. State law concerning the development of multimodal transportation networks and diversity of land uses requires planning for and prioritizing increases in complete streets and infill development, but does not mandate a particular depth of implementation that could translate into a particular threshold of significance. Meanwhile, the State has clear quantitative targets for GHG emissions reduction set forth in law and based on scientific consensus, and the depth of VMT reduction needed to achieve those targets has been quantified. Tying VMT thresholds to GHG reduction also supports the two other statutory goals. Therefore, to ensure adequate analysis of transportation impacts, OPR recommends using quantitative VMT thresholds linked to GHG reduction targets when methods exist to do so.

Various legislative mandates and state policies establish quantitative greenhouse gas emissions reduction targets. For example:

- Assembly Bill 32 (2006) requires statewide GHG emissions reductions to 1990 levels by 2020 and continued reductions beyond 2020.
- Senate Bill 32 (2016) requires at least a 40 percent reduction in GHG emissions from 1990 levels by 2030.
- Pursuant to Senate Bill 375 (2008), the California Air Resources Board GHG emissions reduction targets for metropolitan planning organizations (MPOs) to achieve based on land use patterns and transportation systems specified in Regional Transportation Plans and Sustainable Community Strategies (RTP/SCS). Current targets for the State's largest MPOs call for a 19 percent reduction in GHG emissions from cars and light trucks from 2005 emissions levels by 2035.
- Executive Order B-30-15 (2015) sets a GHG emissions reduction target of 40 percent below 1990 levels by 2030.

- Executive Order S-3-05 (2005) sets a GHG emissions reduction target of 80 percent below 1990 levels by 2050.

- Executive Order B-16-12 (2012) specifies a GHG emissions reduction target of 80 percent below 1990 levels by 2050 specifically for transportation.

- Executive Order B-55-18 (2018) established an additional statewide goal of achieving carbon neutrality as soon as possible, but no later than 2045, and maintaining net negative emissions thereafter. It states, "The California Air Resources Board shall work with relevant state agencies to develop a framework for implementation and accounting that tracks progress toward this goal."

- Senate Bill 391 requires the California Transportation Plan to support 80 percent reduction in GHGs below 1990 levels by 2050.

- The *California Air Resources Board Mobile Source Strategy* (2016) describes California's strategy for containing air pollutant emissions from vehicles, and quantifies VMT growth compatible with achieving state targets.

- The California Air Resources Board's *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* describes California's strategy for containing GHG emissions from vehicles, and quantifies VMT growth compatible with achieving state targets.

Considering these various targets, the California Supreme Court observed:

> Meeting our statewide reduction goals does not preclude all new development. Rather, the Scoping Plan … assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians.

(*Center for Biological Diversity v. California Dept. of Fish & Wildlife*, *supra*, 62 Cal.4th at p. 220.) Indeed, the Court noted that when a lead agency uses consistency with climate goals as a way to determine significance, particularly for long-term projects, the lead agency must consider the project's effect on meeting long-term reduction goals. (*Ibid*.) And more recently, the Supreme Court stated that "CEQA requires public agencies . . . to ensure that such analysis stay in step with evolving scientific knowledge and state regulatory schemes." (*Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 504.)

Meeting the targets described above will require substantial reductions in existing VMT per capita to curb GHG emissions and other pollutants. But targets for overall GHG emissions reduction do not translate directly into VMT thresholds for individual projects for many reasons, including:

- Some, but not all, of the emissions reductions needed to achieve those targets could be accomplished by other measures, including increased vehicle efficiency and decreased fuel carbon content. The CARB's *First Update to the Climate Change Scoping Plan* explains:

"Achieving California's long-term criteria pollutant and GHG emissions goals will require four strategies to be employed: (1) improve vehicle efficiency and develop zero emission technologies, (2) reduce the carbon content of fuels and provide market support to get these lower-carbon fuels into the marketplace, (3) **plan and build communities to reduce vehicular GHG emissions and provide more transportation options, and (4) improve the efficiency and throughput of existing transportation systems.**"[13] CARB's *2018 Progress Report on California's Sustainable Communities and Climate Protection Act* states on page 28 that "California cannot meet its climate goals without curbing growth in single-occupancy vehicle activity." In other words, vehicle efficiency and better fuels are necessary, but insufficient, to address the GHG emissions from the transportation system. Land use patterns and transportation options also will need to change to support reductions in vehicle travel/VMT.

- New land use projects alone will not sufficiently reduce per-capita VMT to achieve those targets, nor are they expected to be the sole source of VMT reduction.

- Interactions between land use projects, and also between land use and transportation projects, existing and future, together affect VMT.

- Because location within the region is the most important determinant of VMT, in some cases, streamlining CEQA review of projects in travel efficient locations may be the most effective means of reducing VMT.

- When assessing climate impacts of some types of land use projects, use of an efficiency metric (e.g., per capita, per employee) may provide a better measure of impact than an absolute numeric threshold. (*Center for Biological Diversity*, *supra*.)

Public Resources Code section 21099 directs OPR to propose criteria for determining the significance of transportation impacts. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in selecting a significance threshold that may be appropriate for their particular projects. While OPR's Technical Advisory is not binding on public agencies, CEQA allows lead agencies to "consider thresholds of significance . . . recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence." (CEQA Guidelines, § 15064.7, subd. (c).) Based on OPR's extensive review of the applicable research, and in light of an assessment by the California Air Resources Board quantifying the need for VMT reduction in order to meet the State's long-term climate goals, **OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold**.

Fifteen percent reductions in VMT are achievable at the project level in a variety of place types.[14]

Moreover, a fifteen percent reduction is consistent with SB 743's direction to OPR to select a threshold that will help the State achieve its climate goals. As described above, section 21099 states that the

---

[13] California Air Resources Board (May 2014) *First Update to the Climate Change Scoping Plan*, p. 46 (emphasis added).
[14] CAPCOA (2010) *Quantifying Greenhouse Gas Mitigation Measures*, p. 55, available at http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.

criteria for determining significance must “promote the reduction in greenhouse gas emissions.” In its document *California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals*[15], CARB assesses VMT reduction per capita consistent with its evidence-based modeling scenario that would achieve State climate goals of 40 percent GHG emissions reduction from 1990 levels by 2030 and 80 percent GHG emissions reduction levels from 1990 by 2050. Applying California Department of Finance population forecasts, CARB finds per-capita light-duty vehicle travel would need to be approximately 16.8 percent lower than existing, and overall per-capita vehicle travel would need to be approximately 14.3 percent lower than existing levels under that scenario. Below these levels, a project could be considered low VMT and would, on that metric, be consistent with 2017 Scoping Plan Update assumptions that achieve climate state climate goals.

CARB finds per capita vehicle travel would need to be kept below what today’s policies and plans would achieve.

CARB’s assessment is based on data in the 2017 Scoping Plan Update and 2016 Mobile Source Strategy. In those documents, CARB previously examined the relationship between VMT and the state’s GHG emissions reduction targets. The Scoping Plan finds:

> “While the State can do more to accelerate and incentivize these local decisions, local actions that reduce VMT are also necessary to meet transportation sector-specific goals and achieve the 2030 target under SB 32. Through developing the Scoping Plan, CARB staff is more convinced than ever that, in addition to achieving GHG reductions from cleaner fuels and vehicles, California must also reduce VMT. Stronger SB 375 GHG reduction targets will enable the State to make significant progress toward needed reductions, but alone will not provide the VMT growth reductions needed; there is a gap between what SB 375 can provide and what is needed to meet the State’s 2030 and 2050 goals.”[16]

Note that, at present, consistency with RTP/SCSs does not necessarily lead to a less-than-significant VMT impact.[17] As the Final 2017 Scoping Plan Update states,

> VMT reductions are necessary to achieve the 2030 target and must be part of any strategy evaluated in this Plan. Stronger SB 375 GHG reduction targets will enable the State to make significant progress toward this goal, but alone will not provide all of the VMT growth reductions that will be needed. There is a gap between what SB 375 can provide and what is needed to meet the State’s 2030 and 2050 goals.”[18]

---

[15] California Air Resources Board (Jan. 2019) *California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals*, available at https://ww2.arb.ca.gov/resources/documents/carb-2017-scoping-plan-identified-vmt-reductions-and-relationship-state-climate.

[16] California Air Resources Board (Nov. 2017) *California’s 2017 Climate Change Scoping Plan*, p. 101.

[17] California Air Resources Board (Feb. 2018) *Updated Final Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets*, Figure 3, p. 35, available at https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf.

[18] California Air Resources Board (Nov. 2017) *California’s 2017 Climate Change Scoping Plan*, p. 75.

Also, in order to capture the full effects of induced travel resulting from roadway capacity projects, an RTP/SCS would need to include an assessment of land use effects of those projects, and the effects of those land uses on VMT. (See section titled "*Estimating VMT Impacts from Transportation Projects"* below.) RTP/SCSs typically model VMT using a collaboratively-developed land use "vision" for the region's land use, rather than studying the effects on land use of the proposed transportation investments.

In summary, achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals.

1. Screening Thresholds for Land Use Projects

Many agencies use "screening thresholds" to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. (See e.g., CEQA Guidelines, §§ 15063(c)(3)(C), 15128, and Appendix G.) As explained below, this technical advisory suggests that lead agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing.

Screening Threshold for Small Projects

Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day[19] generally may be assumed to cause a less-than-significant transportation impact.

Map-Based Screening for Residential and Office Projects

Residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Maps created with VMT data, for example from a travel survey or a travel demand model, can illustrate areas that are

[19] CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

currently below threshold VMT (see recommendations below). Because new development in such locations would likely result in a similar level of VMT, such maps can be used to screen out residential and office projects from needing to prepare a detailed VMT analysis.

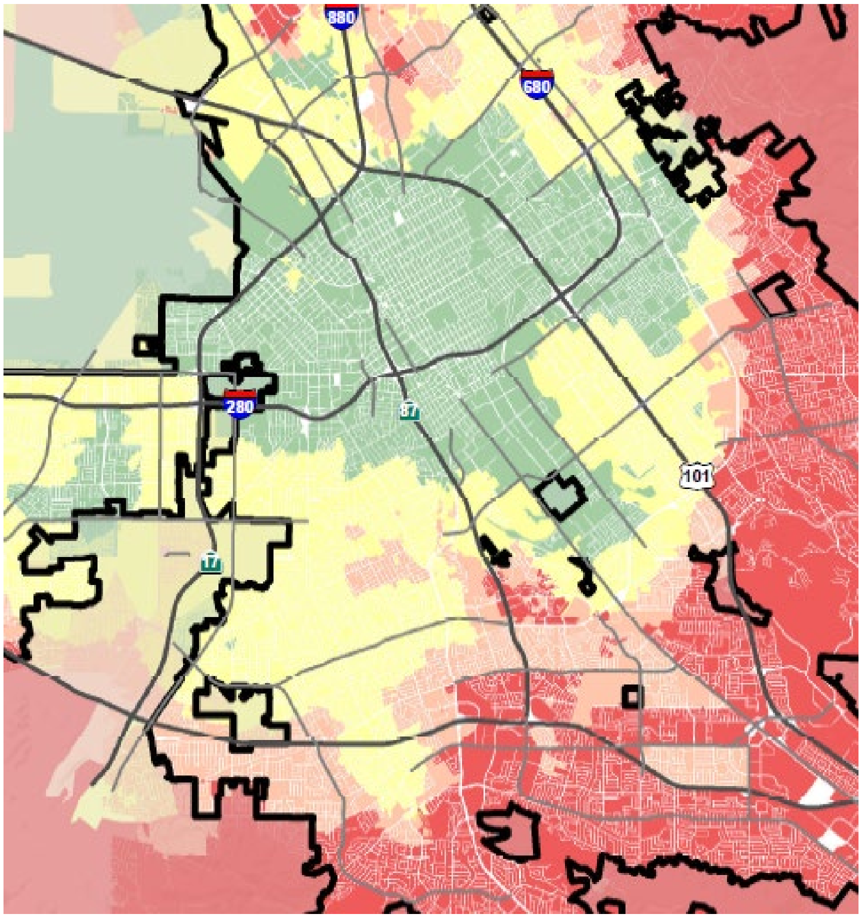


Figure 2. Example map of household VMT that could be used to delineate areas eligible to receive streamlining for VMT analysis. (Source: City of San José, Department of Transportation, draft output of City Transportation Model.)

Presumption of Less Than Significant Impact Near Transit Stations

Proposed CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop[20] or an existing stop

[20] Pub. Resources Code, § 21064.3 ("'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").

along a high quality transit corridor[21] will have a less-than-significant impact on VMT. This presumption would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT. For example, the presumption might not be appropriate if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking)
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization)
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units

A project or plan near transit which replaces affordable residential units[22] with a smaller number of moderate- or high-income residential units may increase overall VMT because the increase in VMT of displaced residents could overwhelm the improvements in travel efficiency enjoyed by new residents.[23]

If any of these exceptions to the presumption might apply, the lead agency should conduct a detailed VMT analysis to determine whether the project would exceed VMT thresholds (see below).

Presumption of Less Than Significant Impact for Affordable Residential Development

Adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT.[24,25] Further, "… low-wage workers in particular would be more likely to choose a residential location close to their workplace, if one is available."[26] In areas where existing jobs-housing match is closer to optimal, low income housing nevertheless generates less VMT than market-

[21] Pub. Resources Code, § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.").
[22] Including naturally-occurring affordable residential units.
[23] Chapple et al. (2017) *Developing a New Methodology for Analyzing Potential Displacement,* Chapter 4, pp. 159-160, available at https://www.arb.ca.gov/research/apr/past/13-310.pdf.
[24] Karner and Benner (2016) *The convergence of social equity and environmental sustainability: Jobs-housing fit and commute distance* ("[P]olicies that advance a more equitable distribution of jobs and housing by linking the affordability of locally available housing with local wage levels are likely to be associated with reduced commuting distances").
[25] Karner and Benner (2015) *Low-wage jobs-housing fit: identifying locations of affordable housing shortages.*
[26] Karner and Benner (2015) *Low-wage jobs-housing fit: identifying locations of affordable housing shortages.*

rate housing.[27,28] Therefore, a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT. Evidence supports a presumption of less than significant impact for a 100 percent affordable residential development (or the residential component of a mixed-use development) in infill locations. Lead agencies may develop their own presumption of less than significant impact for residential projects (or residential portions of mixed use projects) containing a particular amount of affordable housing, based on local circumstances and evidence. Furthermore, a project which includes any affordable residential units may factor the effect of the affordability on VMT into the assessment of VMT generated by those units.

2. Recommended Numeric Thresholds for Residential, Office, and Retail Projects

Recommended threshold for residential projects: A proposed project exceeding a level of 15 percent below existing VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita. Proposed development referencing a threshold based on city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the number of units specified in the SCS for that city, and should be consistent with the SCS.

Residential development that would generate vehicle travel that is 15 or more percent below the existing residential VMT per capita, measured against the region or city, may indicate a less-than-significant transportation impact. In MPO areas, development measured against city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the population or number of units specified in the SCS for that city because greater-than-planned amounts of development in areas above the region-based threshold would undermine the VMT containment needed to achieve regional targets under SB 375.

For residential projects in unincorporated county areas, the local agency can compare a residential project's VMT to (1) the region's VMT per capita, or (2) the aggregate population-weighted VMT per capita of all cities in the region. In MPO areas, development in unincorporated areas measured against aggregate city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the population or number of units specified in the SCS for that city because greater-than-planned amounts of development in areas above the regional threshold would undermine achievement of regional targets under SB 375.

---

[27] Chapple et al. (2017) *Developing a New Methodology for Analyzing Potential Displacement*, available at https://www.arb.ca.gov/research/apr/past/13-310.pdf.
[28] CAPCOA (2010) *Quantifying Greenhouse Gas Mitigation Measures*, pp. 176-178, available at http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.

These thresholds can be applied to either household (i.e., tour-based) VMT or home-based (i.e., trip-based) VMT assessments.[29] It is critical, however, that the agency be consistent in its VMT measurement approach throughout the analysis to maintain an “apples-to-apples” comparison. For example, if the agency uses a home-based VMT for the threshold, it should also be use home-based VMT for calculating project VMT and VMT reduction due to mitigation measures.

Recommended threshold for office projects: A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.

Office projects that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact. In cases where the region is substantially larger than the geography over which most workers would be expected to live, it might be appropriate to refer to a smaller geography, such as the county, that includes the area over which nearly all workers would be expected to live.

Office VMT screening maps can be developed using tour-based data, considering either total employee VMT or employee work tour VMT. Similarly, tour-based analysis of office project VMT could consider either total employee VMT or employee work tour VMT. Where tour-based information is unavailable for threshold determination, project assessment, or assessment of mitigation, home-based work trip VMT should be used throughout all steps of the analysis to maintain an “apples-to-apples” comparison.

Recommended threshold for retail projects: A net increase in total VMT may indicate a significant transportation impact.

Because new retail development typically redistributes shopping trips rather than creating new trips,[30] estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts.

By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.

Many cities and counties define local-serving and regional-serving retail in their zoning codes. Lead agencies may refer to those local definitions when available, but should also consider any project-

[29] See Appendix 1 for a description of these approaches.
[30] Lovejoy, et al. (2013) *Measuring the impacts of local land-use policies on vehicle miles of travel: The case of the first big-box store in Davis, California, The Journal of Transport and Land Use*.

specific information, such as market studies or economic impacts analyses that might bear on customers' travel behavior. Because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a project will likely be local-serving. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.

Mixed-Use Projects

Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential and retail). Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, a project should take credit for internal capture. Combining different land uses and applying one threshold to those land uses may result in an inaccurate impact assessment.

Other Project Types

Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends the quantified thresholds described above for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types. In developing thresholds for other project types, or thresholds different from those recommended here, lead agencies should consider the purposes described in section 21099 of the Public Resources Code and regulations in the CEQA Guidelines on the development of thresholds of significance (e.g., CEQA Guidelines, § 15064.7).

Strategies and projects that decrease local VMT but increase total VMT should be avoided. Agencies should consider whether their actions encourage development in a less travel-efficient location by limiting development in travel-efficient locations.

Redevelopment Projects

Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply.

As described above, a project or plan near transit which replaces affordable[31] residential units with a smaller number of moderate- or high-income residential units may increase overall VMT, because

[31] Including naturally-occurring affordable residential units.

displaced residents' VMT may increase.[32] A lead agency should analyze VMT for such a project even if it otherwise would have been presumed less than significant. The assessment should incorporate an estimate of the aggregate VMT increase experienced by displaced residents. That additional VMT should be included in the numerator of the VMT per capita assessed for the project.

If a residential or office project leads to a net increase in VMT, then the project's VMT per capita (residential) or per employee (office) should be compared to thresholds recommended above. Per capita and per employee VMT are efficiency metrics, and, as such, apply only to the existing project without regard to the VMT generated by the previously existing land use.

If the project leads to a net increase in provision of locally-serving retail, transportation impacts from the retail portion of the development should be presumed to be less than significant. If the project consists of regionally-serving retail, and increases overall VMT compared to with existing uses, then the project would lead to a significant transportation impact.

RTP/SCS Consistency (All Land Use Projects)

Section 15125, subdivision (d), of the CEQA Guidelines provides that lead agencies should analyze impacts resulting from inconsistencies with regional plans, including regional transportation plans. For this reason, if a project is inconsistent with the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), the lead agency should evaluate whether that inconsistency indicates a significant impact on transportation. For example, a development may be inconsistent with an RTP/SCS if the development is outside the footprint of development or within an area specified as open space as shown in the SCS.

3. Recommendations Regarding Land Use Plans

As with projects, agencies should analyze VMT outcomes of land use plans across the full area over which the plan may substantively affect travel patterns, including beyond the boundary of the plan or jurisdiction's geography. And as with projects, VMT should be counted in full rather than split between origin and destination. (Emissions inventories have sometimes spit cross-boundary trips in order to sum to a regional total, but CEQA requires accounting for the full impact without truncation or discounting). Analysis of specific plans may employ the same thresholds described above for projects. A general plan, area plan, or community plan may have a significant impact on transportation if proposed new residential, office, or retail land uses would in aggregate exceed the respective thresholds recommended above. Where the lead agency tiers from a general plan EIR pursuant to CEQA Guidelines sections 15152 and 15166, the lead agency generally focuses on the environmental impacts that are specific to the later project and were not analyzed as significant impacts in the prior EIR. (Pub. Resources Code, § 21068.5; Guidelines, § 15152, subd. (a).) Thus, in analyzing the later project, the lead agency

---

[32] Chapple et al. (2017) *Developing a New Methodology for Analyzing Potential Displacement,* Chapter 4, pp. 159-160, available at https://www.arb.ca.gov/research/apr/past/13-310.pdf.

would focus on the VMT impacts that were not adequately addressed in the prior EIR. In the tiered document, the lead agency should continue to apply the thresholds recommended above.

Thresholds for plans in non-MPO areas may be determined on a case-by-case basis.

4. Other Considerations

Rural Projects Outside of MPOs

In rural areas of non-MPO counties (i.e., areas not near established or incorporated cities or towns), fewer options may be available for reducing VMT, and significance thresholds may be best determined on a case-by-case basis. Note, however, that clustered small towns and small town main streets may have substantial VMT benefits compared to isolated rural development, similar to the transit oriented development described above.

Impacts to Transit

Because criteria for determining the significance of transportation impacts must promote "the development of multimodal transportation networks" pursuant to Public Resources Code section 21099, subd. (b)(1), lead agencies should consider project impacts to transit systems and bicycle and pedestrian networks. For example, a project that blocks access to a transit stop or blocks a transit route itself may interfere with transit functions. Lead agencies should consult with transit agencies as early as possible in the development process, particularly for projects that are located within one half mile of transit stops.

When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new transit users as an adverse impact. An infill development may add riders to transit systems and the additional boarding and alighting may slow transit vehicles, but it also adds destinations, improving proximity and accessibility. Such development also improves regional vehicle flow by adding less vehicle travel onto the regional network.

Increased demand throughout a region may, however, cause a cumulative impact by requiring new or additional transit infrastructure. Such impacts may be adequately addressed through a fee program that fairly allocates the cost of improvements not just to projects that happen to locate near transit, but rather across a region to all projects that impose burdens on the entire transportation system, since transit can broadly improve the function of the transportation system.

F. Considering the Effects of Transportation Projects on Vehicle Travel

Many transportation projects change travel patterns. A transportation project which leads to additional vehicle travel on the roadway network, commonly referred to as "induced vehicle travel," would need to quantify the amount of additional vehicle travel in order to assess air quality impacts, greenhouse gas emissions impacts, energy impacts, and noise impacts. Transportation projects also are required to examine induced growth impacts under CEQA. (See generally, Pub. Resources Code, §§ 21065 [defining "project" under CEQA as an activity as causing either a direct or reasonably foreseeable indirect physical change], 21065.3 [defining "project-specific effect" to mean all direct or indirect environmental effects], 21100, subd. (b) [required contents of an EIR].) For any project that increases vehicle travel, explicit assessment and quantitative reporting of the amount of additional vehicle travel should not be omitted from the document; such information may be useful and necessary for a full understanding of a project's environmental impacts. (See Pub. Resources Code, §§ 21000, 21001, 21001.1, 21002, 21002.1 [discussing the policies of CEQA].) A lead agency that uses the VMT metric to assess the transportation impacts of a transportation project may simply report that change in VMT as the impact. When the lead agency uses another metric to analyze the transportation impacts of a roadway project, changes in amount of vehicle travel added to the roadway network should still be analyzed and reported.[33]

While CEQA does not require perfection, it is important to make a reasonably accurate estimate of transportation projects' effects on vehicle travel in order to make reasonably accurate estimates of GHG emissions, air quality emissions, energy impacts, and noise impacts. (See, e.g., *California Clean Energy Com. v. City of Woodland* (2014) 225 Cal.App.4th 173, 210 [EIR failed to consider project's transportation energy impacts]; *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 266.) Appendix 2 describes in detail the causes of induced vehicle travel, the robust empirical evidence of induced vehicle travel, and how models and research can be used in conjunction to quantitatively assess induced vehicle travel with reasonable accuracy.

If a project would likely lead to a measurable and substantial increase in vehicle travel, the lead agency should conduct an analysis assessing the amount of vehicle travel the project will induce. Project types that would likely lead to a measurable and substantial increase in vehicle travel generally include:

- Addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, or lanes through grade-separated interchanges

Projects that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis, include:

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity
- Roadside safety devices or hardware installation such as median barriers and guardrails

---

[33] See, e.g., California Department of Transportation (2006) *Guidance for Preparers of Growth-related, Indirect Impact Analyses*, available at http://www.dot.ca.gov/ser/Growth-related_IndirectImpactAnalysis/GRI_guidance06May_files/gri_guidance.pdf.

- 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

1. Recommended Significance Threshold for Transportation Projects

As noted in Section 15064.3 of the CEQA Guidelines, lead agencies for roadway capacity projects have discretion, consistent with CEQA and planning requirements, to choose which metric to use to evaluate transportation impacts. This section recommends considerations for evaluating impacts using vehicle miles traveled. Lead agencies have discretion to choose a threshold of significance for transportation projects as they do for other types of projects. As explained above, Public Resources Code section 21099, subdivision (b)(1), provides that criteria for determining the significance of transportation impacts must promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. (*Id.;* see generally, adopted CEQA Guidelines, § 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) With those goals in mind, OPR prepared and the Agency adopted an appropriate transportation metric.

Whether adopting a threshold of significance, or evaluating transportation impacts on a case-by-case basis, a lead agency should ensure that the analysis addresses:

- Direct, indirect and cumulative effects of the transportation project (CEQA Guidelines, § 15064, subds. (d), (h))
- Near-term and long-term effects of the transportation project (CEQA Guidelines, §§ 15063, subd. (a)(1), 15126.2, subd. (a))
- The transportation project's consistency with state greenhouse gas reduction goals (Pub. Resources Code, § 21099)[34]
- The impact of the transportation project on the development of multimodal transportation networks (Pub. Resources Code, § 21099)
- The impact of the transportation project on the development of a diversity of land uses (Pub. Resources Code, § 21099)

The CARB Scoping Plan and the CARB Mobile Source Strategy delineate VMT levels required to achieve legally mandated GHG emissions reduction targets. A lead agency should develop a project-level threshold based on those VMT levels, and may apply the following approach:

1. Propose a fair-share allocation of those budgets to their jurisdiction (e.g., by population);

[34] The California Air Resources Board has ascertained the limits of VMT growth compatible with California containing greenhouse gas emissions to levels research shows would allow for climate stabilization. (See *The 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (p. 78, p. 101); *Mobile Source Strategy* (p. 37).) CARB's *Updated Final Staff Report on Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets* illustrates that the current Regional Transportation Plans and Sustainable Communities Strategies will fall short of achieving the necessary on-road transportation-related GHG emissions reductions called for in the 2017 Scoping Plan (Figure 3, p. 35). Accordingly, OPR recommends not basing GHG emissions or transportation impact analysis for a transportation project solely on consistency with an RTP/SCS.

2. Determine the amount of VMT growth likely to result from background population growth, and subtract that from their "budget";
3. Allocate their jurisdiction's share between their various VMT-increasing transportation projects, using whatever criteria the lead agency prefers.

2. Estimating VMT Impacts from Transportation Projects

CEQA requires analysis of a project's potential growth-inducing impacts. (Pub. Resources Code, § 21100, subd. (b)(5); CEQA Guidelines, § 15126.2, subd. (d).) Many agencies are familiar with the analysis of growth inducing impacts associated with water, sewer, and other infrastructure. This technical advisory addresses growth that may be expected from roadway expansion projects.

Because a roadway expansion project can induce substantial VMT, incorporating quantitative estimates of induced VMT is critical to calculating both transportation and other impacts of these projects. Induced travel also has the potential to reduce or eliminate congestion relief benefits. An accurate estimate of induced travel is needed to accurately weigh costs and benefits of a highway capacity expansion project.

The effect of a transportation project on vehicle travel should be estimated using the "change in total VMT" method described in *Appendix 1*. This means that an assessment of total VMT without the project and an assessment with the project should be made; the difference between the two is the amount of VMT attributable to the project. The assessment should cover the full area in which driving patterns are expected to change. As with other types of projects, the VMT estimation should not be truncated at a modeling or jurisdictional boundary for convenience of analysis when travel behavior is substantially affected beyond that boundary.

Transit and Active Transportation Projects

Transit and active transportation projects generally reduce VMT and therefore are presumed to cause a less-than-significant impact on transportation. This presumption may apply to all passenger rail projects, bus and bus rapid transit projects, and bicycle and pedestrian infrastructure projects. Streamlining transit and active transportation projects aligns with each of the three statutory goals contained in SB 743 by reducing GHG emissions, increasing multimodal transportation networks, and facilitating mixed use development.

Roadway Projects

Reducing roadway capacity (for example, by removing or repurposing motor vehicle travel lanes) will generally reduce VMT and therefore is presumed to cause a less-than-significant impact on transportation. Generally, no transportation analysis is needed for such projects.

Building new roadways, adding roadway capacity in congested areas, or adding roadway capacity to areas where congestion is expected in the future, typically induces additional vehicle travel. For the types of projects previously indicated as likely to lead to additional vehicle travel, an estimate should be made of the change in vehicle travel resulting from the project.

For projects that increase roadway capacity, lead agencies can evaluate induced travel quantitatively by applying the results of existing studies that examine the magnitude of the increase of VMT resulting from a given increase in lane miles. These studies estimate the percent change in VMT for every percent change in miles to the roadway system (i.e., "elasticity").[35] Given that lead agencies have discretion in choosing their methodology, and the studies on induced travel reveal a range of elasticities, lead agencies may appropriately apply professional judgment in studying the transportation effects of a particular project. The most recent major study, estimates an elasticity of 1.0, meaning that every percent change in lane miles results in a one percent increase in VMT.[36]

To estimate VMT impacts from roadway expansion projects:

1. Determine the total lane-miles over an area that fully captures travel behavior changes resulting from the project (generally the region, but for projects affecting interregional travel look at all affected regions).
2. Determine the percent change in total lane miles that will result from the project.
3. Determine the total existing VMT over that same area.
4. Multiply the percent increase in lane miles by the existing VMT, and then multiply that by the elasticity from the induced travel literature:

[% increase in lane miles] x [existing VMT] x [elasticity] = [VMT resulting from the project]

A National Center for Sustainable Transportation tool can be used to apply this method: https://ncst.ucdavis.edu/research/tools

This method would not be suitable for rural (non-MPO) locations in the state which are neither congested nor projected to become congested. It also may not be suitable for a new road that provides new connectivity across a barrier (e.g., a bridge across a river) if it would be expected to substantially

[35] See U.C. Davis, Institute for Transportation Studies (Oct. 2015) *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion*; Boarnet and Handy (Sept. 2014) *Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions*, California Air Resources Board Policy Brief, available at https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf.
[36] See Duranton and Turner (2011) *The Fundamental Law of Road Congestion: Evidence from US cities*, available at http://www.nber.org/papers/w15376.

shorten existing trips. If it is likely to be substantial, the trips-shortening effect should be examined explicitly.

The effects of roadway capacity on vehicle travel can also be applied at a programmatic level. For example, in a regional planning process the lead agency can use that program-level analysis to streamline later project-level analysis. (See CEQA Guidelines, § 15168.) A program-level analysis of VMT should include effects of the program on land use patterns, and the VMT that results from those land use effects. In order for a program-level document to adequately analyze potential induced demand from a project or program of roadway capacity expansion, lead agencies cannot assume a fixed land use pattern (i.e., a land use pattern that does not vary in response to the provision of roadway capacity). A proper analysis should account for land use investment and development pattern changes that react in a reasonable manner to changes in accessibility created by transportation infrastructure investments (whether at the project or program level).

Mitigation and Alternatives

Induced VMT has the potential to reduce or eliminate congestion relief benefits, increase VMT, and increase other environmental impacts that result from vehicle travel.[37] If those effects are significant, the lead agency will need to consider mitigation or alternatives. In the context of increased travel that is induced by capacity increases, appropriate mitigation and alternatives that a lead agency might consider include the following:

- Tolling new lanes to encourage carpools and fund transit improvements
- Converting existing general purpose lanes to HOV or HOT lanes
- Implementing or funding off-site travel demand management
- Implementing Intelligent Transportation Systems (ITS) strategies to improve passenger throughput on existing lanes

Tolling and other management strategies can have the additional benefit of preventing congestion and maintaining free-flow conditions, conferring substantial benefits to road users as discussed above.

G. Analyzing Other Impacts Related to Transportation

While requiring a change in the methodology of assessing transportation impacts, Public Resources Code section 21099 notes that this change "does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation." OPR expects that lead agencies will continue to

[37] See National Center for Sustainable Transportation (Oct. 2015) *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion*, available at http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf; see Duranton and Turner (2011) *The Fundamental Law of Road Congestion: Evidence from US cities*, available at http://www.nber.org/papers/w15376.

address mobile source emissions in the air quality and noise sections of an environmental document and the corresponding studies that support the analysis in those sections. Lead agencies should continue to address environmental impacts of a proposed project pursuant to CEQA's requirements, using a format that is appropriate for their particular project.

Because safety concerns result from many different factors, they are best addressed at a programmatic level (i.e., in a general plan or regional transportation plan) in cooperation with local governments, metropolitan planning organizations, and, where the state highway system is involved, the California Department of Transportation. In most cases, such an analysis would not be appropriate on a project-by-project basis. Increases in traffic volumes at a particular location resulting from a project typically cannot be estimated with sufficient accuracy or precision to provide useful information for an analysis of safety concerns. Moreover, an array of factors affect travel demand (e.g., strength of the local economy, price of gasoline), causing substantial additional uncertainty. Appendix B of OPR's General Plan Guidelines summarizes research which could be used to guide a programmatic analysis under CEQA. Lead agencies should note that automobile congestion or delay does not constitute a significant environmental impact (Pub. Resources Code, §21099(b)(2)), and safety should not be used as a proxy for road capacity.

H. VMT Mitigation and Alternatives

When a lead agency identifies a significant impact, it must identify feasible mitigation measures that could avoid or substantially reduce that impact. (Pub. Resources Code, § 21002.1, subd. (a).) Additionally, CEQA requires that an environmental impact report identify feasible alternatives that could avoid or substantially reduce a project's significant environmental impacts.

Indeed, the California Court of Appeal recently held that a long-term regional transportation plan was deficient for failing to discuss an alternative which could significantly reduce total vehicle miles traveled. In *Cleveland National Forest Foundation v. San Diego Association of Governments, et al.* (2017) 17 Cal.App.5th 413, the court found that omission "inexplicable" given the lead agency's "acknowledgment in its Climate Action Strategy that the state's efforts to reduce greenhouse gas emissions from on-road transportation will not succeed if the amount of driving, or vehicle miles traveled, is not significantly reduced." (*Cleveland National Forest Foundation*, *supra*, 17 Cal.App.5th at p. 436.) Additionally, the court noted that the project alternatives focused primarily on congestion relief even though "the [regional] transportation plan is a long-term and congestion relief is not necessarily an effective long-term strategy." (*Id.* at p. 437.) The court concluded its discussion of the alternatives analysis by stating: "Given the acknowledged long-term drawbacks of congestion relief alternatives, there is not substantial evidence to support the EIR's exclusion of an alternative focused primarily on significantly reducing vehicle trips." (*Ibid*.)

Several examples of potential mitigation measures and alternatives to reduce VMT are described below. However, the selection of particular mitigation measures and alternatives are left to the discretion of the lead agency, and mitigation measures may vary, depending on the proposed project and significant impacts, if any. Further, OPR expects that agencies will continue to innovate and find new ways to reduce vehicular travel.

Potential measures to reduce vehicle miles traveled include, but are not limited to:

- Improve or increase access to transit.
- Increase access to common goods and services, such as groceries, schools, and daycare.
- Incorporate affordable housing into the project.
- Incorporate neighborhood electric vehicle network.
- Orient the project toward transit, bicycle and pedestrian facilities.
- Improve pedestrian or bicycle networks, or transit service.
- Provide traffic calming.
- Provide bicycle parking.
- Limit or eliminate parking supply.
- Unbundle parking costs.
- Provide parking cash-out programs.
- Implement roadway pricing.
- Implement or provide access to a commute reduction program.
- Provide car-sharing, bike sharing, and ride-sharing programs.
- Provide transit passes.
- Shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services.
- Providing telework options.
- Providing incentives or subsidies that increase the use of modes other than single-occupancy vehicle.
- Providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms.
- Providing employee transportation coordinators at employment sites.
- Providing a guaranteed ride home service to users of non-auto modes.

Notably, because VMT is largely a regional impact, regional VMT-reduction programs may be an appropriate form of mitigation. In lieu fees have been found to be valid mitigation where there is both a commitment to pay fees and evidence that mitigation will actually occur. (*Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 140-141; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 727–728.) Fee programs are particularly useful to address cumulative impacts. (CEQA Guidelines, § 15130, subd. (a)(3) [a "project's incremental contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact"].) The mitigation program must undergo CEQA evaluation, either on the program as a whole, or the in-lieu fees or other mitigation must be evaluated on a project-specific basis. (*California Native Plant Society v. County of El Dorado* (2009) 170 Cal.App.4th 1026.) That CEQA evaluation could be part of a larger program, such as a regional transportation plan, analyzed in a Program EIR. (CEQA Guidelines, § 15168.)

Examples of project alternatives that may reduce vehicle miles traveled include, but are not limited to:

- Locate the project in an area of the region that already exhibits low VMT.
- Locate the project near transit.
- Increase project density.
- Increase the mix of uses within the project or within the project's surroundings.
- Increase connectivity and/or intersection density on the project site.
- Deploy management strategies (e.g., pricing, vehicle occupancy requirements) on roadways or roadway lanes.

Appendix 1. Considerations About Which VMT to Count

Consistent with the obligation to make a good faith effort to disclose the environmental consequences of a project, lead agencies have discretion to choose the most appropriate methodology to evaluate project impacts.[38] A lead agency can evaluate a project's effect on VMT in numerous ways. The purpose of this document is to provide technical considerations in determining which methodology may be most useful for various project types.

Background on Estimating Vehicle Miles Traveled

Before discussing specific methodological recommendations, this section provides a brief overview of modeling and counting VMT, including some key terminology.

Here is an illustrative example of some methods of estimating vehicle miles traveled. Consider the following hypothetical travel day (all by automobile):

1. Residence to Coffee Shop
2. Coffee Shop to Work
3. Work to Sandwich Shop
4. Sandwich Shop to Work
5. Work to Residence
6. Residence to Store
7. Store to Residence

Trip-based assessment of a project's effect on travel behavior counts VMT from individual trips to and from the project. It is the most basic, and traditionally the most common, method of counting VMT. A trip-based VMT assessment of the residence in the above example would consider segments 1, 5, 6 and 7. For residential projects, the sum of home-based trips is called *home-based* VMT.

A *tour-based* assessment counts the entire home-back-to-home tour that includes the project. A tour-based VMT assessment of the residence in the above example would consider segments 1, 2, 3, 4, and 5 in one tour, and 6 and 7 in a second tour. A tour-based assessment of the workplace would include segments 1, 2, 3, 4, and 5. Together, all tours comprise *household* VMT.

---

[38] The California Supreme Court has explained that when an agency has prepared an environmental impact report:

> [T]he issue is not whether the [lead agency's] studies are irrefutable or whether they could have been better. The relevant issue is only whether the studies are sufficiently credible to be considered as part of the total evidence that supports the [lead agency's] finding[.]

(*Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 409; see also *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App.4th 357, 372.)

Both trip- and tour-based assessments can be used as measures of transportation efficiency, using denominators such as per capita, per employee, or per person-trip.

Trip- and Tour-based Assessment of VMT

As illustrated above, a tour-based assessment of VMT is a more complete characterization of a project's effect on VMT. In many cases, a project affects travel behavior beyond the first destination. The location and characteristics of the home and workplace will often be the main drivers of VMT. For example, a residential or office development located near high quality transit will likely lead to some commute trips utilizing transit, affecting mode choice on the rest of the tour.

Characteristics of an office project can also affect an employee's VMT beyond the work tour. For example, a workplace located at the urban periphery, far from transit, can require an employee to own a car, which in turn affects the entirety of an employee's travel behavior and VMT. For this reason, when estimating the effect of an office development on VMT, it may be appropriate to consider total employee VMT if data and tools, such as tour-based models, are available. This is consistent with CEQA's requirement to evaluate both direct and *indirect* effects of a project. (See CEQA Guidelines, § 15064, subd. (d)(2).)

Assessing Change in Total VMT

A third method, estimating the *change in total VMT* with and without the project, can evaluate whether a project is likely to divert existing trips, and what the effect of those diversions will be on total VMT. This method answers the question, "What is the net effect of the project on area VMT?" As an illustration, assessing the total change in VMT for a grocery store built in a food desert that diverts trips from more distant stores could reveal a net VMT reduction. The analysis should address the full area over which the project affects travel behavior, even if the effect on travel behavior crosses political boundaries.

Using Models to Estimate VMT

Travel demand models, sketch models, spreadsheet models, research, and data can all be used to calculate and estimate VMT (see Appendix F of the preliminary discussion draft). To the extent possible, lead agencies should choose models that have sensitivity to features of the project that affect VMT. Those tools and resources can also assist in establishing thresholds of significance and estimating VMT reduction attributable to mitigation measures and project alternatives. When using models and tools for those various purposes, agencies should use comparable data and methods, in order to set up an "apples-to-apples" comparison between thresholds, VMT estimates, and VMT mitigation estimates.

Models can work together. For example, agencies can use travel demand models or survey data to estimate existing trip lengths and input those into sketch models such as CalEEMod to achieve more accurate results. Whenever possible, agencies should input localized trip lengths into a sketch model to tailor the analysis to the project location. However, in doing so, agencies should be careful to avoid double counting if the sketch model includes other inputs or toggles that are proxies for trip length (e.g., distance to city center). Generally, if an agency changes any sketch model defaults, it should record and report those changes for transparency of analysis. Again, trip length data should come from the same source as data used to calculate thresholds to be sure of an "apples-to-apples" comparison.

Additional background information regarding travel demand models is available in the California Transportation Commission's "2010 Regional Transportation Plan Guidelines," beginning at page 35.

Appendix 2. Induced Travel: Mechanisms, Research, and Additional Assessment Approaches

Induced travel occurs where roadway capacity is expanded in an area of present or projected future congestion. The effect typically manifests over several years. Lower travel times make the modified facility more attractive to travelers, resulting in the following trip-making changes:

- **Longer trips.** The ability to travel a long distance in a shorter time increases the attractiveness of destinations that are farther away, increasing trip length and vehicle travel.
- **Changes in mode choice.** When transportation investments are devoted to reducing automobile travel time, travelers tend to shift toward automobile use from other modes, which increases vehicle travel.
- **Route changes.** Faster travel times on a route attract more drivers to that route from other routes, which can increase or decrease vehicle travel depending on whether it shortens or lengthens trips.
- **Newly generated trips.** Increasing travel speeds can induce additional trips, which increases vehicle travel. For example, an individual who previously telecommuted or purchased goods on the internet might choose to accomplish those tasks via automobile trips as a result of increased speeds.
- **Land Use Changes.** Faster travel times along a corridor lead to land development farther along that corridor; that new development generates and attracts longer trips, which increases vehicle travel. Over several years, this induced growth component of induced vehicle travel can be substantial, making it critical to include in analyses.

Each of these effects has implications for the total amount of vehicle travel. These effects operate over different time scales. For example, changes in mode choice might occur immediately, while land use changes typically take a few years or longer. CEQA requires lead agencies to analyze both short-term and long-term effects.

Evidence of Induced Vehicle Travel. A large number of peer reviewed studies[39] have demonstrated a causal link between highway capacity increases and VMT increases. Many provide quantitative estimates of the magnitude of the induced VMT phenomenon. Collectively, they provide high quality evidence of the existence and magnitude of the induced travel effect.

---

[39] See, e.g., Boarnet and Handy (Sept. 2014) Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions, California Air Resources Board Policy Brief, available at https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf; National Center for Sustainable Transportation (Oct. 2015) *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion*, available at http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf.

Most of these studies express the amount of induced vehicle travel as an "elasticity," which is a multiplier that describes the additional vehicle travel resulting from an additional lane mile of roadway capacity added. For example, an elasticity of 0.6 would signify an 0.6 percent increase in vehicle travel for every 1.0 percent increase in lane miles. Many of these studies distinguish "short run elasticity" (increase in vehicle travel in the first few years) from "long run elasticity" (increase in vehicle travel beyond the first few years). Long run elasticity is larger than short run elasticity, because as time passes, more of the components of induced vehicle travel materialize. Generally, short run elasticity can be thought of as excluding the effects of land use change, while long run elasticity includes them. Most studies find a long run elasticity between 0.6 and just over 1.0,[40] meaning that every increase in lanes miles of one percent leads to an increase in vehicle travel of 0.6 to 1.0 percent. The most recent major study finds the elasticity of vehicle travel by lanes miles added to be 1.03; in other words, each percent increase in lane miles results in a 1.03 percent increase in vehicle travel.[41] (An elasticity greater than 1.0 can occur because new lanes induce vehicle travel that spills beyond the project location.) In CEQA analysis, the long-run elasticity should be used, as it captures the full effect of the project rather than just the early-stage effect.

Quantifying Induced Vehicle Travel Using Models. Lead agencies can generally achieve the most accurate assessment of induced vehicle travel resulting from roadway capacity increasing projects by applying elasticities from the academic literature, because those estimates include vehicle travel resulting from induced land use. If a lead agency chooses to use a travel demand model, additional analysis would be needed to account for induced land use. This section describes some approaches to undertaking that additional analysis.

Proper use of a travel demand model can capture the following components of induced VMT:

- Trip length (generally increases VMT)
- Mode shift (generally shifts from other modes toward automobile use, increasing VMT)
- Route changes (can act to increase or decrease VMT)
- Newly generated trips (generally increases VMT)
    - Note that not all travel demand models have sensitivity to this factor, so an off-model estimate may be necessary if this effect could be substantial.

However, estimating long-run induced VMT also requires an estimate of the project's effects on land use. This component of the analysis is important because it has the potential to be a large component of

---

[40] See Boarnet and Handy (Sept. 2014) *Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions*, California Air Resources Board Policy Brief, p. 2, available at https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf.

[41] Duranton and Turner (2011) *The Fundamental Law of Road Congestion: Evidence from US cities*, available at http://www.nber.org/papers/w15376.

the overall induced travel effect. Options for estimating and incorporating the VMT effects that are caused by the subsequent land use changes include:

1. *Employ an expert panel.* An expert panel could assess changes to land use development that would likely result from the project. This assessment could then be analyzed by the travel demand model to assess effects on vehicle travel. Induced vehicle travel assessed via this approach should be verified using elasticities found in the academic literature.
2. *Adjust model results to align with the empirical research.* If the travel demand model analysis is performed without incorporating projected land use changes resulting from the project, the assessed vehicle travel should be adjusted upward to account for those land use changes. The assessed VMT after adjustment should fall within the range found in the academic literature.
3. *Employ a land use model, running it iteratively with a travel demand model.* A land use model can be used to estimate the land use effects of a roadway capacity increase, and the traffic patterns that result from the land use change can then be fed back into the travel demand model. The land use model and travel demand model can be iterated to produce an accurate result.

A project which provides new connectivity across a barrier, such as a new bridge across a river, may provide a shortened path between existing origins and destinations, thereby shortening existing trips. In rare cases, this trip-shortening effect might be substantial enough to reduce the amount of vehicle travel resulting from the project below the range found in the elasticities in the academic literature, or even lead a net reduction in vehicle travel overall. In such cases, the trip-shortening effect could be examined explicitly.

Whenever employing a travel demand model to assess induced vehicle travel, any limitation or known lack of sensitivity in the analysis that might cause substantial errors in the VMT estimate (for example, model insensitivity to one of the components of induced VMT described above) should be disclosed and characterized, and a description should be provided on how it could influence the analysis results. A discussion of the potential error or bias should be carried into analyses that rely on the VMT analysis, such as greenhouse gas emissions, air quality, energy, and noise.

Appendix B
Guidelines for Transportation Impact Studies in the San Diego Region

DRAFT

GUIDELINES FOR TRANSPORTATION IMPACT STUDIES IN THE SAN DIEGO REGION

January 22, 2019

ACKNOWLEDGEMENTS

This technical paper was prepared by members of the Institute of Transportation Engineers, San Diego Section, Transportation Capacity and Mobility Task Force, SB 743 Subcommittee.

PRINCIPAL AUTHORS

Erik Ruehr, VRPA Technologies (Subcommittee Chair)
Katy Cole, Fehr and Peers
Mychal Loomis, Kimley- Horn and Associates
KC Yellapu, Linscott, Law & Greeenspan, Engineers
Justin Rasas, LOS Engineering

ADDITIONAL SB 743 SUBCOMMITTEE MEMBERS

Andrew Martin, Ascent Environmental
Alyssa Begley, Caltrans
Roger Sanchez-Rengel, Caltrans
Phuong Nguyen, Chen Ryan Associates
Scott Barker, City of Chula Vista
Meghan Cedeno, City of San Diego
George Ghossain, City of San Diego
Samir Hajjiri, City of San Diego
Minjie Mei, City of Santee
Sarah Brandenberg, Fehr and Peers
Larry Hofreiter, Port of San Diego
Mike Calandra, SANDAG
Keith Greer, SANDAG
Sandipan Bhattacharjee, Translutions
Jacob Armstrong, Caltrans
Kimberly Dodson, Caltrans
Monique Chen, Chen Ryan Associates
Craig Williams, City of Carlsbad
Claudia Brizuela, City of San Diego
Maureen Gardiner, City of San Diego
Ann Gonsalves, City of San Diego
Nic Abboud, City of San Marcos
Meghan Macias, EPD Solutions
Amy Jackson, Kimley- Horn and Associates
Cara Hilgesen, Linscott, Law & Greenspan, Engineers
Walter Musial, Linscott, Law & Greenspan, Engineers
Dawn Wilson, Michael Baker International
David Wong-Toi

TABLE OF CONTENTS

APPENDICES

List of Figures

List of Tables

GUIDELINES FOR TRANSPORTATION IMPACT STUDIES (TIS) IN THE SAN DIEGO REGION

1.0 BACKGROUND

The original Guidelines for Traffic Impact Studies in the San Diego Region (ITE/SANTEC, 2000) have been in use for over 18 years. They were developed by a group of volunteers from the San Diego Section of the Institute of Transportation Engineers (ITE) and the San Diego Traffic Engineers Council (SANTEC). The guidelines were later incorporated into the region's Congestion Management Program (CMP) prepared by the San Diego Association of Governments (SANDAG, 2008). Although the inclusion the Congestion Management Program (CMP) increased the visibility of the guidelines for a period of time, SANDAG has since opted out of the CMP process.

The intent in preparing the guidelines was to promote consistency in the methodology for traffic impact studies used by different agencies in the San Diego region. While these guidelines were not intended to be used as a standard or a requirement, they provided a methodology for traffic impact studies that is similar to the methodology used by most agencies within the region. Some agencies in the region have "adopted" the guidelines by specifying that traffic impact studies follow the procedures recommended by the guidelines. Other agencies, including San Diego County and the City of San Diego, prepared their own guidelines that included some common elements with the regional guidelines.

The need to develop a revised set of regional transportation impact study guidelines is primarily related to the passage of Senate Bill 743 (SB 743) in the fall of 2013. This legislation led to a change in the way that transportation impacts are measured under the California Environmental Quality Act (CEQA). Starting on July 1, 2020, automobile delay and level of service (LOS) may no longer be used as the performance measure to determine the transportation impacts of land development projects under CEQA. Instead, vehicle miles traveled (VMT) will become a required metric. This requirement does not modify the discretion lead agencies have to analyze impacts to other components of the transportation system such as walking, bicycling, transit, and safety. SB 743 also applies to transportation projects, although agencies were given flexibility in the determination of the performance measure for these types of projects.

The intent of SB 743 is to bring CEQA transportation analyses into closer alignment with other statewide policies regarding greenhouse gases, complete streets, and smart growth. Using VMT as a performance measure instead of LOS is intended to discourage suburban sprawl, reduce greenhouse gas emissions, encourage the development of smart growth, complete streets, and multimodal transportation networks.

2.0 PURPOSE OF GUIDELINES

The guidelines described in this report were prepared to provide methodologies for transportation engineers and planners to conduct CEQA transportation analyses for land development and transportation projects in compliance with SB 743. Lead agencies may opt-in to using VMT at any time, but will be required to use it for analysis of transportation impacts of land development projects starting July 1, 2020. In addition, methodologies are provided to evaluate automobile delay and LOS outside of the CEQA process. Although no longer incorporated in CEQA (starting July 2020), automobile delay and LOS continue to be of interest to transportation engineers and planners who plan, design, operate, and maintain the roadway system. In addition, delay experienced due to traffic congestion is a concern to drivers and passengers of vehicles using the roadway system.

Given the need to prepare VMT-based CEQA transportation impact analyses to satisfy the requirements of SB 743 as well as the need to evaluate the performance of the roadway system based on delay and LOS, these guidelines are divided into separate parts. Part I is focused on CEQA transportation impact analyses while Part II is focused on the more traditional LOS-based transportation analyses, called local transportation analysis for the purpose of these guidelines. Local transportation analysis includes evaluation of any multimodal transportation improvements (transit, bicycle, pedestrian) that are recommended to support a land development project but may or may not be required as mitigation measures for a project's significant VMT impacts. Background information for each is provided below with more detail included in the sections that follow.

CEQA TRANSPORTATION IMPACT ANALYSIS

The SB 743 legislation specified that the Governor's Office of Planning and Research (OPR) prepare guidelines for the implementation of SB 743. During the period from the passage of SB 743 in 2013 to the fall of 2017, OPR prepared various sets of guidelines and sought public comments from stakeholders. This resulted in two documents dated November 2017 that were sent to the California Natural Resources Agency for adoption into CEQA:

- CEQA Guidelines Revisions: Revisions to the CEQA Guidelines are made through a formal process conducted by the Natural Resources Agency. Changes can only be made through a future CEQA update process.

- Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory): The technical advisory provides recommendations for the preparation of transportation impact analyses under SB 743. It is not formally included in CEQA and can be revised by OPR at any time without going through a formal process. Updated versions of the technical advisory are expected to be issued by OPR as new information becomes available and as California agencies gain experience in applying SB 743 to actual projects. As of the time of preparation of these transportation impact study guidelines, two updates to the November 2017 technical advisory had been published, and the current version is dated December 2018.

In addition to the differences described above, the CEQA Guidelines revisions and the technical advisory also differ in the extent to which they must be followed by local agencies. The CEQA Guidelines revisions are rules that must be followed in order to prepare an adequate CEQA document. In contrast, the technical advisory provides statewide guidance based on evidence collected by OPR that can be refined or modified by local agencies with appropriate justification and substantial evidence. (Refer to CEQA Guidelines Section 15384 for a definition of substantial evidence.) As an example, the CEQA Guidelines revisions specify that a land development project's effect on automobile delay does not cause a significant environmental impact. The use of VMT is suggested as a performance metric, but there is no indication of what level of VMT increase would cause a significant environmental impact. The technical advisory suggests various thresholds for the significance of VMT impacts but does not require the use of a particular threshold. Therefore, lead agencies would be prohibited from using automobile delay to determine significant transportation impacts and would be required to use VMT instead. Lead agencies have discretion to select their preferred significance thresholds and could choose to use the thresholds suggested in the technical advisory or develop alternative thresholds. Either decision should be supported by substantial evidence that considers the legislative intent objectives of SB 743 and the specific direction the statue provides regarding setting thresholds (per the excerpts below):

> SB 743 Statute - Legislative Intent
> *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.*

> SB 743 Statute – Section 21099(b)(1)
> *Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.*

Regardless of the changes described above, SB 743 is clear in its intent that CEQA documents continue to address noise, air quality, and safety (per the excerpt below):

> SB 743 Statute – Section 21099(b)(3)
> *This subdivision does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation. The methodology established by these guidelines shall not create a presumption that a project will not result in significant impacts related to air quality, noise, safety, or any other impact associated with transportation.*

Although SB 743 will require the use of VMT analysis, it does not change expectations for evaluating potential impacts to other components of the transportation system as noted above. A complete environmental review will generally consider how projects effect VMT in addition to effects on walking, bicycling, using transit, and safety when traveling.

The CEQA transportation impact analysis described in these transportation impact study guidelines is based on the technical advisory prepared by OPR, but refinements and clarifications have been added to reflect local conditions. For any subsequent revisions of the SB 743 technical advisory prepared by OPR, it would need to be determined whether the new information would suggest a change in the methodologies for conducting CEQA transportation impact studies in the San Diego region.

LOCAL TRANSPORTATION ANALYSIS

As stated above, localized traffic congestion remains a concern to transportation engineers and planners as well as the traveling public. It is recommended that consideration be given to preparation of a local transportation analysis for all land development and transportation projects that evaluates a project's access and circulation within and nearby the project site. The local transportation analysis would provide analysis of roadway conditions where there is the potential that substantial worsening of traffic congestion would result due to implementation of the project. In addition, it would analyze the need for multimodal improvements in cases where there is the potential for the project to cause a substantial worsening of conditions for multimodal travel. Since any increases in traffic congestion or vehicular delay would not constitute a significant environmental impact, the local transportation analysis could be included in the project's CEQA document for information only or it could be provided in a separate document. The purposes of the local transportation analysis may include, but is not limited to the following:

- Recommendations for any roadway improvements that should be built/implemented by the project (or should be built/implemented by the project in coordination with other nearby land development projects) based on the project's expected effect on vehicular delay and LOS.

- Recommendations for any multimodal transportation improvements (transit, bicycle, pedestrian) that should be built/implemented by the project (or should be built/implemented by the project in coordination with other nearby land development projects). Recommended multimodal transportation improvements may be required as mitigation measures for transportation impacts related to VMT increases or they may be recommended for other reasons.

- Transportation analysis needed to determine the appropriate level of fees for multimodal transportation improvements if the local jurisdiction has a fee program in place.

- Documentation of the project's expected effect on vehicular delay and level of service in the nearby transportation system.

The roadway analysis methodologies recommended for conducting local transportation analysis, as detailed in Part II of these guidelines are based on the previous regional traffic impact study guidelines, with changes to reflect evolution in the practice that has occurred Users of these guidelines should note that transportation analysis advances occur each year as documented through key conferences such as the Transportation Research Board (TRB) Annual Meeting. Further, new data vendors and new mobility options continue to evolve. As such, the recommended methodologies in this document may require on-going updates and refinements. The recommended methodologies for multimodal transportation analysis generally reflect new procedures that were not included in the previous guidelines.

The intent of these guidelines is that agencies in the San Diego region be encouraged to implement Part I – CEQA guidelines to promote consistency in methodology and the pursuit of VMT reductions to meet regional and state goals. It is recognized that agencies may wish to make specific exceptions to these guidelines to account for local conditions. Agencies may also desire to have additional analyses conducted outside of the CEQA analyses to help inform staff and decision makers in reviewing a project. To that end, Part II – Local Transportation Analyses reflects an update to the previous regional Traffic Impact Study Guidelines.

3.0 PROJECT COORDINATION AND STAFF CONSULTATION

TIS preparers are encouraged to discuss the project with the lead reviewing agency's staff reviewer at an early stage in the planning process. An understanding of the level of detail and the assumptions required for the analysis should be reached. While a pre-submittal conference is highly encouraged, it may not be a requirement. For straightforward studies prepared by consultants familiar with these TIS procedures, a telephone call or e-mail, followed by a verification of key assumptions, may suffice. Transportation impact studies should be prepared by a qualified transportation professional. Lead agencies should consider requiring that all transportation impact studies by prepared by or reviewed under the supervision of a licensed traffic engineer.

PART I – CEQA TRANSPORTATION ANALYSIS

4.0 INDIVIDUAL LAND DEVELOPMENT PROJECTS AND SPECIFIC PLANS

The recommended methodology for conducting a VMT analysis is based on guidance prepared by the California Governor's Office of Planning and Research (OPR) as provided in the published Technical Advisory on Evaluating Transportation Impacts in CEQA. At the time of writing of these guidelines, the current version of OPR's technical advisory was dated December 2018. The guidance recommended by OPR has been modified to be better suited to local conditions in the San Diego region. These modifications are noted in the details described later in this chapter.

The basic process is to compare a project's estimated VMT/capita or VMT/employee to average values on a regional, city-wide, or community basis. The target is to achieve a project VMT/employee or VMT/capita that is 85% or less of the appropriate average based on suggestions in these guidelines. Note that lead agencies have discretion for choosing a VMT metric and threshold. The selection should represent how VMT reduction is balanced against other objectives of the lead agency and be supported by substantial evidence.

The methodology for determining VMT/capita or VMT/employee is related to the project's expected daily trip generation. The process for determining appropriate methodology to be used for conducting a VMT analysis for individual land development projects and specific plans is summarized in Figure 4-1.

The remainder of this section of the guidelines is divided into individual components that describe different aspects of the methodology.

MINIMUM PROJECT SIZE

It is recommended that projects be subjected to different levels of VMT analysis, depending on the size of the project and whether the project is consistent with the local jurisdiction's General Plan or Community Plan. Projects that are consistent with the General Plan or Community Plan are also considered to be consistent with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The determination of minimum project size for VMT analysis described below differs from the statewide guidance provided by OPR. It is based on regional standards for transportation analyses that were documented in the Guidelines for Traffic Impact Studies in the San Diego Region (ITE/SANTEC, 2000) and have been in use for over 18 years.

The following level of VMT analysis is recommended based on project size (expressed in terms of Average Daily Trips generated by the project, also known as ADT) and zoning:

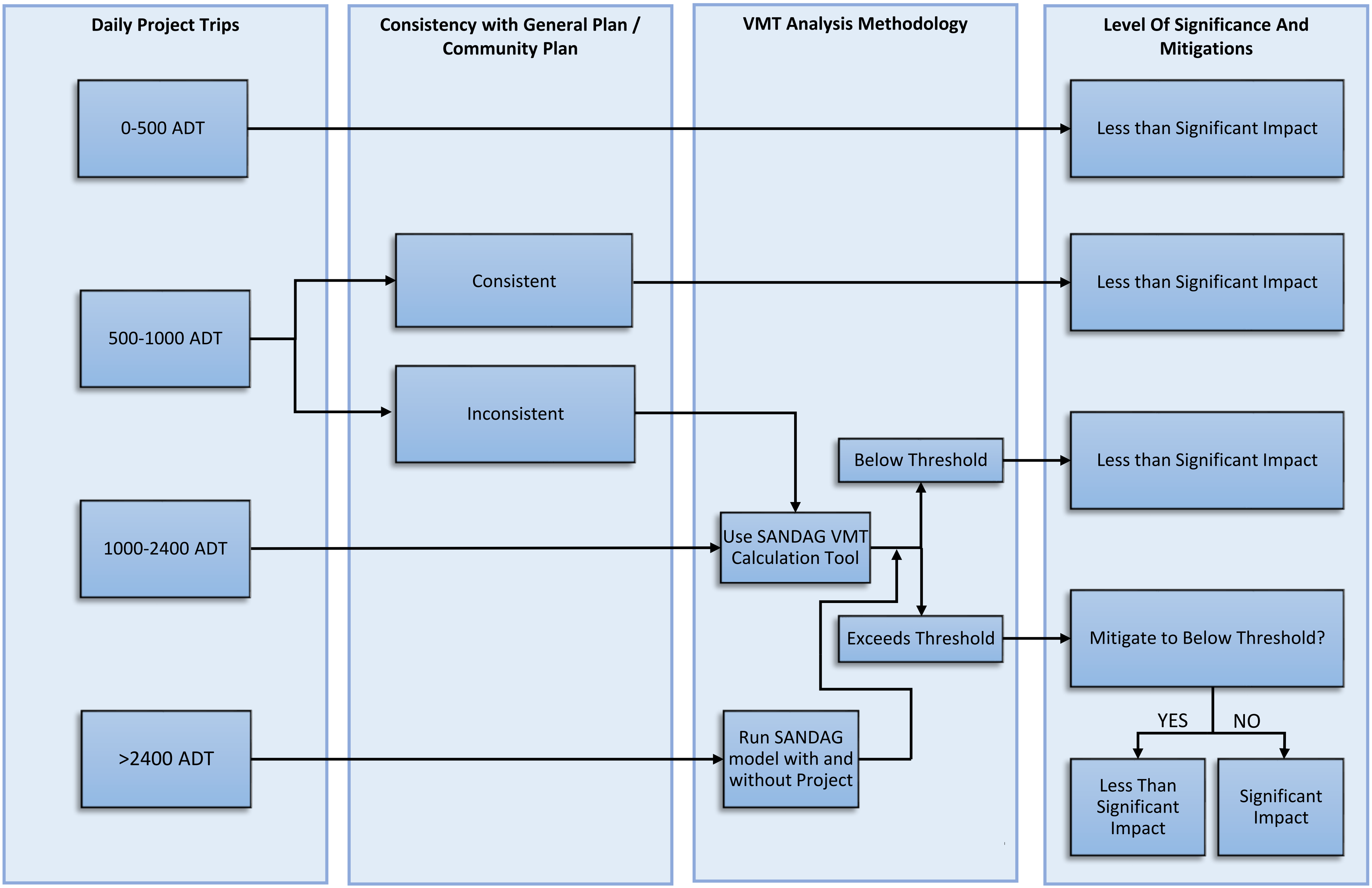
Projects Inconsistent with General Plan or Community Plan

ADT	Level of Analysis
0 – 500	VMT Analysis Not Needed/VMT Impacts Presumed Insignificant
500 and Greater	VMT Analysis Recommended

Projects Consistent with General Plan or Community Plan

ADT	Level of Analysis
0 – 1,000	VMT Analysis Not Needed/VMT Impacts Presumed Insignificant
1,000 and Greater	VMT Analysis Recommended

Figure 4-1
VMT Analysis for Individual Land Development Projects



PROJECTS LOCATED NEAR TRANSIT STATIONS

OPR's technical advisory contains the following guidance regarding projects located near transit stations:

- Proposed CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop or an existing stop along a high quality transit corridor will have a less-than-significant impact on VMT. This presumption would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT.

An existing major transit stop is defined as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."
For the purposes of these guidelines, the distance between the project site and the transit station is typically based on walking distance.

Under normal circumstances, a major transit stop would be considered to be applicable for this purpose if the transit stop were assumed to be in place in SANDAG's RTIP scenario (see Methodology for VMT analysis for further discussion of this scenario).

METHODOLOGY FOR VMT ANALYSIS

As mentioned above, it is recommended that VMT thresholds for SB 743 analysis will be developed by comparisons to average VMT/capita (for residential projects) or VMT/employee (for employment projects). The analysis can be conducted by comparing either the project VMT/capita or VMT/employee to both the San Diego regional average and the average for the city or community in which the project is located. If the project average is lower than either 85% of the regional average or 85% of the average for the city or community in which the project is located, the VMT impacts of the project can be presumed less than significant. It will be up to each city in the San Diego region and the County to either define its jurisdiction as a single community for the purposes of determining VMT thresholds or to subdivide its jurisdiction into smaller communities for the purpose of SB 743 analysis.

It should be noted that OPR's technical advisory includes special considerations for affordable housing and these considerations are also recommended for use in the San Diego area. Projects that include 100% affordable housing in infill locations can be presumed to have a less than significant VMT impact. Infill locations will typically have better than average access to transit and/or greater opportunities for walking and bicycling trips. The exact definition of infill locations will need to be determined based on local conditions.

The VMT methodology recommended above differs from the statewide guidance recommended by OPR in the following ways:

- OPR recommends that VMT/capita comparisons for residential projects be made both on a regional and city-wide basis. These guidelines recommend that a city may choose to do comparisons at a community level rather than at the city-wide level. This recommendation applies to all cities within San Diego County and provides the lead agencies flexibility and discretion for selecting the threshold that is appropriate for their agency, based on their values and substantial evidence. Many communities within cities within the San Diego Region have a size and population that is comparable to a typical city on a statewide basis. The unincorporated area of San Diego County also has a governing structure in place for its communities and the choice to do VMT/capita comparisons at a community level is also recommended to be extended to the unincorporated area of the County. The Cities of Encinitas and Chula Vista are also examples of cities that have distinct communities that have been treated differently for various historical planning considerations.

- OPR recommends that VMT/employee comparisons for employment projects be conducted at a regional basis only, as compared to VMT/capita comparisons that are made both at a regional and city-wide basis. These guidelines recommend that VMT/employee comparisons be made at both the regional and at the city-wide level (or community level as described above). The San Diego Region is the third largest region in California (after the Los Angeles Area and the San Francisco Bay Area). While some employment trips are made across the region (or even outside the region), there is a large incentive to live and work within a relatively short distance, even within the same city or community, to avoid the relatively long commute distances that can be experienced by traveling across the region during peak commute hours.

- OPR recommends that the VMT/capita comparisons for projects in unincorporated county areas be based on the average of all cities within the county. These guidelines recommend that VMT/capita and VMT/employee comparisons for projects in the unincorporated area of San Diego County be made to the overall average VMT/capita and VMT/employee for the unincorporated area of the county. San Diego County is one of the largest counties in California in terms of geography and also one of the most diverse in terms of topography and climate. While the VMT/capita comparison recommended by OPR may make sense for some counties in California, the comparisons between unincorporated areas and averages of the cities makes less sense in San Diego County where there are great differences in terms of distance and other factors between rural and urban areas of the County. In addition, there is a technical reason for recommending that VMT/capita comparisons for projects in the unincorporated area of San Diego County be made to the overall average VMT/capita for the unincorporated area of the county. The SANDAG VMT analysis tool described below is based on determining VMT/capita averages for each city or community in the region. Comparing projects in the unincorporated county area of the county to the average VMT/capita of the cities will result in a double-counting of VMT/capita values in the cities. For the reasons described in the bullet above, these guidelines also recommend that VMT/employee comparisons be made at both the regional and at the city-wide level or community level.

It is recommended that once the SB 743 analysis communities have been defined by local jurisdictions, SANDAG should then calculate the average VMT/capita (for residential projects) and the average VMT/employee (for employment projects) for each city or community. This calculation can be based on the Regional Transportation Improvement Plan (RTIP) scenario for future land use and transportation network which includes expected growth through the end of the RTIP scenario and transportation network improvements that are considered to be funded through the RTIP. It is recommended that the RTIP scenario used for VMT analysis purposes will be held constant once it is created and will only be changed once every four years with the update of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). It is recommended that the SANDAG online VMT analysis tool (described below) also be held constant and be updated every four years.

Retail development falls into a category which is neither considered to be residential nor employment-based. For retail projects, these guidelines are based on the methodology recommended by OPR for retail projects. It is recommended that local-serving retail projects be presumed to have less than significant VMT impacts and regional-serving retail projects be presumed to have significant VMT impacts if they increase VMT above the level that would occur for conditions without the project.

For some land development projects, it may not be immediately obvious whether the project is a residential project or an employment project. For these projects, the preferred methodology is to analyze the trip-making characteristics of the project and then use either the residential or employment methodology. For example, a hotel may be considered to have trip-making characteristics closer to an employment project and therefore the employment methodology could be used for this land use category.

The recommended methodology for calculation of VMT depends on the size of the project as determined by the project's trip generation calculated in terms of ADT. For projects with a trip generation of less than 2,400 ADT, the recommended VMT analysis methodology is the SANDAG VMT calculation tool. SANDAG has prepared an online tool that calculates average VMT/capita and VMT/employee at the census tract level. Analysts would use this tool to determine the project's VMT/employee or VMT/capita to be compared to community, city, and/or regional averages.

Definitions of VMT/capita and VMT/employee that are used in SANDAG's VMT calculation tool are as follows:

- VMT/Capita: Includes all vehicle-based person trips grouped and summed to the home location of individuals on the trip. It includes home-based and non-home-based trips. The VMT for each home is then summed for all homes in a particular census tract and divided by the population of that census tract to arrive at Resident VMT/Capita.

- VMT/Employee: Includes all vehicle-based person trips grouped and summed to the work location of individuals on the trip. This includes all trips, not just work-related trips. The VMT for each work location is then summed for all work locations in a particular census tract and divided by the number of employees of that census tract to arrive at Employee VMT/Employee.

The recommended methodology for projects over 2,400 ADT is to run the regional transportation model with and without the project to determine the project's net increase in VMT and then use that value to determine VMT/employee or VMT/capita to be compared to community, city, and/or regional averages.

REDVELOPMENT PROJECTS

Recommendations for VMT analysis of redevelopment projects are based on guidance provided by OPR with the clarifications provided below.

Redevelopment projects represent a special case since the recommended VMT thresholds for SB 743 implementation represent an efficiency metric. Under SB 743, the primary goal is for all new land development projects to achieve efficiency from a VMT point of view. The efficiency or lack of efficiency of the existing land use is typically not relevant per OPR.

The following methodology is recommended:

- A redevelopment project that reduces absolute VMT (i.e. the total VMT with the project is less than the total VMT without the project) would be presumed to have less than significant VMT impacts.

- If a project increases absolute VMT, it is recommended that the VMT analysis methodology described above be applied to the proposed land use, as if the project was proposed on a vacant parcel (i.e. the existing land use didn't exist).

OPR's technical advisory includes specific recommendations that relate to redevelopment projects that replace affordable residential units with a smaller number of market-rate residential units. Those recommendations also considered applicable for the purposes of these guidelines.

MIXED-USE PROJECTS

Recommendations for VMT analysis of mixed-use projects are based on guidance provided by OPR with additional clarifications recommended for use in the San Diego region.

The following steps are recommended:

- Calculate trip generation separately for each component of the mixed-use project.

- Determine the reduction in external vehicle trips due to internal capture based on guidance provided in the ITE Trip Generation manual, MXD methodologies or other techniques.

- Apply the reduction in trips to the individual land uses so that the total trip generation of the individual land uses is equal to the total project trip generation, including internal capture.

- Using the reduced trip generation, determine the VMT/capita or VMT/employee for applicable land uses. SANDAG's online VMT calculation tool may be used to determine an average trip length for the land uses within a mixed-use development based on the reported VMT/capita or VMT/employee in the census tract where the project is located. The number of residents or employees will need to be estimated for each applicable land use. When using SANDAG's VMT calculation tool to estimate average trip length, analysts should be aware that the data produced by the SANDAG VMT calculation tool is based all resident VMT/capita, so it includes the VMT associated with all trips made by the resident for the day, for example trip from home to daycare to office; office to meeting to office; office to store to home. The ITE trip generation rate for residential is only home-based trips, i.e. trips that start or end at the residence. The effect of the distinction between ITE's data and the data produced by the SANDAG VMT calculation tool will vary by location, type of project, and other factors.

- Compare the VMT/capita or VMT/employee values calculated using the reduced trip generation to applicable VMT thresholds to determine whether the individual components of the mixed-use development would be expected to have a significant VMT impact. If any component of the mixed-use development would be expected to have a significant VMT impact, the project as a whole would be considered to have a significant VMT impact.

- Local-serving retail within a mixed-use development can be presumed to have a less than significant VMT impact.

PROJECTS IN RURAL AREAS

Land development projects in rural areas may be given special consideration due to their unique trip-making characteristics. OPR's technical advisory contains the following guidance regarding projects in rural areas:

- "In rural areas of non-MPO counties (i.e., areas not near established or incorporated cities or towns), fewer options may be available for reducing VMT, and significance thresholds may be best determined on a case-by-case basis. Note, however, that clustered small towns and small town main streets may have substantial VMT benefits compared to isolated rural development, similar to the transit oriented development described above."

If interpreted literally, this guidance would not apply to the San Diego region since it is an MPO County. However, rural areas are considered to have similar trip-making characteristics regardless of whether they are located in an MPO County or not. Therefore, different thresholds than described above could be considered for the rural areas of San Diego County. In order to apply this concept, local agencies would designate a portion of their jurisdiction as rural and then establish a separate threshold for the determination of significant VMT impacts.

PHASED PROJECTS

For projects proposed to be built in phases, it is recommended that each phase of the project be evaluated separately. This evaluation would include a determination of whether significant VMT impacts would occur and whether mitigation is recommended. The evaluation of VMT for each phase would include consideration of the previous project phases. For example, a project with three phases would include the following analyses:

- VMT Analysis of Phase 1: Assumes development of Phase 1 only.
- VMT Analysis of Phase 2: Assumes development of Phases 1 and 2.
- VMT Analysis of Complete Project: Assumes development of Phases 1, 2, and 3.

MITIGATION

If a project's VMT exceeds the thresholds identified above for individual land development projects and specific plans, it can be presumed to have a significant transportation impact. According to the OPR's technical advisory, when a significant impact is determined, feasible mitigation measures must be identified that could avoid or substantially reduce the impact. Lead agencies are generally given the discretion to determine what mitigation actions are 'feasible' but they must rely on substantial evidence in making these determinations. In addition, CEQA requires the identification of feasible mitigation alternatives that could avoid or substantially reduce a project's significant environmental impacts.

Not all mitigation measures are physical improvements to the transportation network. A sample mitigation measure might include telework options for employees to reduce vehicular travel. Examples of other mitigation measures based on OPR's technical advisory include but are not limited to the following:

- Improve or increase access to transit.
- Increase access to common goods and services, such as groceries, schools, and daycare.
- Incorporate affordable housing into the project.
- Incorporate a neighborhood electric vehicle network.
- Orient the project toward transit, bicycle, and pedestrian facilities.
- Improve pedestrian or bicycle networks, or transit service.
- Provide traffic calming.
- Provide bicycle parking.
- Limit or eliminate parking supply.
- Unbundle parking costs.
- Provide parking or roadway pricing or cash-out programs.
- Implement or provide access to a commute reduction program.
- Provide car-sharing, bike sharing, and ride-sharing programs.
- Provide partially or fully subsidized transit passes.
- Shift single occupancy vehicle trips to carpooling or vanpooling by providing ride-matching services or shuttle services.
- Provide telework options.
- Provide incentives or subsidies that increase the use of modes other than a single-occupancy vehicle.
- Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, showers and locker rooms, and bicycle repair services.
- Provide employee transportation coordinators at employment sites.
- Provide a guaranteed ride home service to users of non-auto modes.
- Contribute to a mobility fee program that funds multimodal transportation improvements, such as those described above.

Additional mitigation measures may become acceptable as agencies continue to innovate and find new ways to reduce vehicular travel.

Changes to the project design or location could potentially reduce VMT. Project alternatives based on OPR's technical advisory that may reduce vehicle miles of travel include but are not limited to the following:

- Locate the project in an area of the region that already exhibits low VMT.
- Locate the project near transit.
- Increase project density.
- Increase the mix of uses within the project or within the project's surroundings.
- Increase connectivity and/or intersection density on the project site.

OPR's technical advisory notes that because VMT is largely a regional impact and regional VMT-reduction programs may be an appropriate form of mitigation. In-lieu fees and development impact fees have been found to be valid mitigation where there is both a commitment to pay fees and evidence that mitigation will actually occur.

Fee programs are particularly useful to address cumulative impacts. The physical improvements that constitute the mitigation program as a whole must undergo CEQA evaluation, and the imposition of development impact fees or in-lieu fees shall be in accordance with applicable regulations, such as the Mitigation Fee Act. Other mitigation must be evaluated on a project-specific basis. That CEQA evaluation could be part of a larger program, such as a regional transportation plan analyzed in a Program EIR.

Quantifying the reduction in VMT associated with potential mitigation measures for land development projects and specific plans is a relatively new endeavor for transportation engineers and planners. Therefore, these guidelines do not recommend a methodology that has been in practice or has generally been accepted for local use.

One current resource that has been identified to quantify the reduction in vehicle miles traveled associated with a particular mitigation measure is the latest edition of California Air Pollution Control Officers Association's *Quantifying Greenhouse Gas Mitigation Measures, A resource for Local Government to Assess Emission Reductions from Green Gas Mitigation Measures* report (CAPCOA Report). This report provides a methodology to quantify the reductions in vehicle miles traveled for many of the mitigation measures listed above. At the time of preparation of these guidelines, new research was underway that would provide an update to the CAPCOA Report.

The following elements should be considered when utilizing the CAPCOA Report:

- The CAPCOA VMT reduction strategies include built environment changes and transportation demand management (TDM) actions. The built environment changes are scalable from the project site to larger geographic areas and are often captured in regional travel forecasting models such as the SANDAG model. Prior to any application of a built environment change to a project as mitigation, the project analyst should verify that the project VMT forecasting tool or model is appropriately accurate and sensitive to built-environment effects and that no double counting will occur in the application of the mitigation measure. The TDM actions are sensitive to the project site and ultimate building tenants. As such, VMT reductions associated with TDM actions cannot be guaranteed through CEQA mitigation without ongoing monitoring and adjustment.

- There are rules for calculating the VMT reduction when applying multiple mitigation measures. The CAPCOA Report rules should be considered.

- Only "new" mitigation measures should be included in the analysis to prevent double counting. For example, if the project is located near transit, the VMT reduction cannot be applied if the project utilized a model that factored in the project's proximity to transit. In addition, telecommuting is included in SANDAG's base model.

- Mitigation measures should be applied to the appropriate user group (employees, guest/patrons, etc.). If a certain measure applies to multiple user groups, the weighted average should be considered as the effect of the mitigation measure will vary based on the user group.

A second potential resource that was underway at the time of preparation of these guidelines was a VMT calculation tool that may be provided as part of SANDAG's Mobility Management Toolbox project.

Additional VMT calculation tools are currently available or under development by several local agencies in California. Although these tools are being developed for specific jurisdictions, they could be adopted or modified for use in individual jurisdictions in San Diego County. At the time of development of these guidelines, the following calculation tools were publicly available.

- City of San Jose: A VMT calculation tool and other information can be found at the following website: http://www.sanjoseca.gov/vmt

5.0 COMMUNITY PLANS AND GENERAL PLANS

The recommended methodology for conducting a VMT analysis for community plans and general plans is to compare the existing VMT/capita for the community plan or general plan area with the expected horizon year VMT/capita. The recommended target is to achieve a lower VMT/capita in the horizon year with the proposed plan than occurs for existing conditions.

The calculation of VMT for a planning area requires different considerations than the calculation of VMT for an individual project or a specific plan. Generally, the use of a computerized travel forecasting model (such as the SANDAG regional model) would be needed. For details on the calculation of VMT for a planning area, analysts are referred to ITE's paper on VMT calculations (Vehicle Miles Travelled Calculations Using the SANDAG Regional Model, 2013).

If VMT analysis for a community plan or general plan requires consideration of mitigation measures to mitigate significant VMT impacts, potential mitigation measures would be similar to those used for land development projects, with some modifications. The following measures could be considered:

- Modify land use plan to increase development in areas with low VMT/capita characteristics and/or decrease development in areas with high VMT/capita characteristics.
- Provide enhanced bicycle and/or pedestrian facilities.
- Add roadways to the street network if those roadways would provide shorter travel paths for existing and/or future trips.
- Improve or increase access to transit.
- Increase access to common goods and services, such as groceries, schools, and daycare.
- Incorporate a neighborhood electric vehicle network.
- Provide traffic calming.
- Limit or eliminate parking supply.
- Unbundle parking costs.
- Provide parking or roadway pricing or cash-out programs.
- Implement or provide access to a commute reduction program.
- Provide car-sharing, bike sharing, and ride-sharing programs.
- Provide partially or fully subsidized transit passes.
- Shift single occupancy vehicle trips to carpooling or vanpooling by providing ride-matching services or shuttle services.
- Provide telework options.
- Provide incentives or subsidies that increase the use of modes other than a single-occupancy vehicle.
- Provide employee transportation coordinators at employment sites.
- Provide a guaranteed ride home service to users of non-auto modes.

Additional mitigation measures may become acceptable as agencies continue to innovate and find new ways to reduce vehicular travel.

6.0 TRANSPORTATION PROJECTS

VMT is the recommended performance measure for the analysis of transportation projects. The recommended methodology for conducting a VMT analysis for transportation projects is to compare the project with the community plan or general plan in which the project is located to determine whether the project would increase VMT as compared to the VMT that would be expected to occur with community plan or general plan. This is summarized in Figure 6-1. The analysis would vary depending on the mode of travel associated with the project and based on whether the project is currently included in the community plan or general plan.

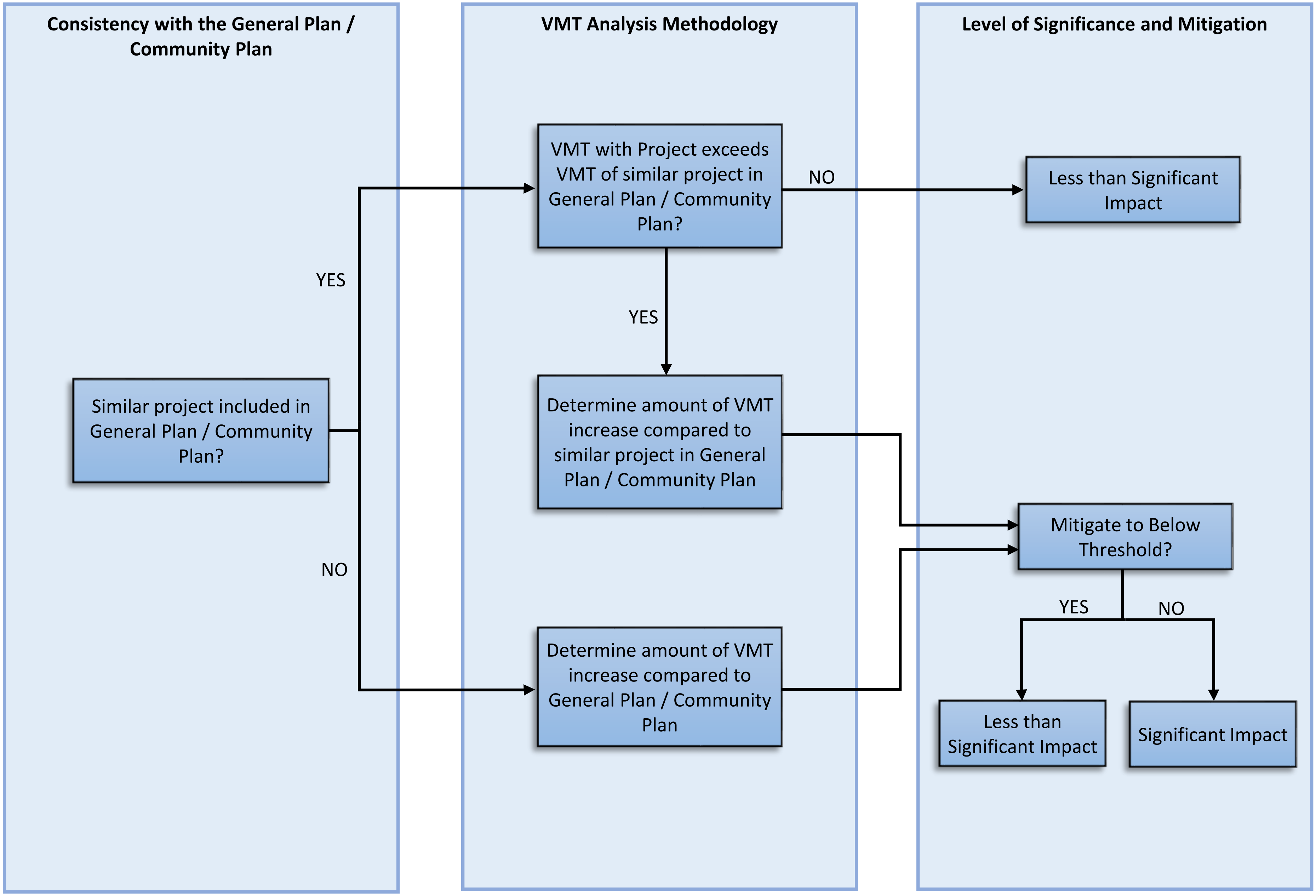
- Transit, bicycle, and pedestrian projects that would encourage the use of these modes of travel would be expected to reduce VMT would not require a detailed VMT analysis and would be presumed to have a less than significant impact on transportation. For these project types, the presumption of less than significant impact would apply even if the project was not in the community plan or general plan.

- Roadway projects (or multimodal projects that include roadways) that are included in the community or general plan, VMT impacts would be presumed to have less than significant VMT impacts. In the case of some projects, a similar project may have been included in the community plan or general plan, but revisions or refinements have been incorporated. If the revisions or refinements are expected to cause increases in VMT, analysis should be conducted to compare the proposed project to the project description in the community plan or general plan. Projects that cause VMT increases in comparison to similar projects proposed in the community plan or general plan, would need to reduce VMT levels below the level of VMT expected in the community plan or general plan in order to avoid a significant VMT impact.

- Roadway projects (or multimodal projects that include roadways) that are not included in the community or general plan would need, a detailed analysis of VMT to determine whether the project would be expected to increase or decrease VMT as compared to VMT levels in the community plan or general plan. For small projects, the VMT analysis could be conducted using sketch planning techniques. For large projects, the analysis would generally require the use of a computerized travel forecasting model (such as the SANDAG regional model). For very large projects (i.e. projects that would reduce travel time by five minutes or more for any individual trips), consideration should be given to conducting an analysis of induced demand as described in OPR's technical advisory The five-minute threshold for analysis of induced demand is based on a research paper published by the Transportation Research Board (Effects of Increased Highway Capacity: Results of Household Travel Behavior Survey, Richard G. Dowling and Steven B. Colman, Transportation Research Record 1493, Transportation Research Board, 1995). This research concluded that projects that decrease travel time by more than five minutes for a large number of trips would probably warrant an upward adjustment of travel demand.

The statewide guidance for VMT analysis of transportation projects is less specific than the guidance provided for land development projects. In the case of transportation projects, new CEQA guidance allows lead agencies the discretion to choose the performance measure for transportation analysis, including the use of level of service and delay as a performance measure. OPR's technical advisory provides guidance indicating that VMT is the preferred measure of effectiveness for transportation projects but it has no authority to require the use of VMT as a performance measure. Although OPR's technical advisory

Figure 6-1
VMT Analysis Flow Chart for Transportation Projects



encourages the use of VMT as a performance measure, it does not recommend a particular threshold of significance for VMT.

Given the available statewide guidance, these guidelines recommend the use of VMT as the performance measure for transportation projects. The recommended significance threshold is the level of VMT expected based on the community plan or general plan in which the project is located. This methodology is recommended for the following reasons:

- Although the new CEQA guidance allows for the use of any appropriate performance measure for the analysis of transportation projects, the intent of the SB 743 legislation was taken into consideration in the selection of a performance measure. SB 743 is intended to promote multimodal transportation networks, encourage infill development, and reduction of greenhouse gases. VMT is considered to be the performance measure that best reflects this intent.

- OPR's technical advisory encourages the use of VMT as a performance measure. Although this recommendation is not binding, the intent of these guidelines is to follow OPR's guidance, except in cases where there are regional characteristics or other factors that suggest a revision or clarification.

- The use of community plan or general plan consistency as a VMT threshold is based on the process by which transportation projects are incorporated into a community plan or general plan. In order for a transportation project to be incorporated into a community or general plan, a considerable amount of analysis is typically conducted. Community plans and general plans typically include the preparation of an Environmental Impact Report that considers a variety of environmental impacts, including transportation impacts. Since community plans and general plans are considered to represent sound urban planning decisions, consistency with these plans is considered to be a reasonable benchmark for the determination of a VMT significance threshold.

While the guidance described above is considered to be appropriate for larger transportation projects, smaller projects would be presumed to have less than significant VMT impacts based on their size or other considerations. Following is a list of projects considered to be in this category. This list in based on information in OPR's technical advisory, with revisions and clarifications based on local conditions:

1. Rehabilitation, maintenance, replacement and repair projects designed to improve the condition of existing transportation assets (e.g., highways, roadways, bridges, culverts, tunnels, transit systems, and assets that serve bicycle and pedestrian facilities) and that do not add motor vehicle capacity

2. Roadside safety devices or hardware installation such as median barriers and guardrails

3. Roadway shoulder enhancements to provide "breakdown space," dedicated space for use only by transit vehicles, to provide bicycle access, or otherwise to improve safety, but which will not be used as automobile vehicle travel lanes

4. Addition of an auxiliary lane of less than two miles in length

5. Installation, removal, or reconfiguration of traffic lanes at intersections that are intended to provide operational or safety improvements

6. Addition of roadway capacity on local or collector streets provided the project also includes appropriate improvements for pedestrians, cyclists, and, if applicable, transit

7. 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

8. Addition of a new lane that is intended to be restricted to use only by transit vehicles

9. Reduction in number of through lanes

10. 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

11. Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features

12. Installation of traffic metering systems, detection systems, cameras, changeable message signs, and other electronics designed to optimize vehicle, bicycle, or pedestrian flow

13. Timing of signals to optimize vehicle, bicycle, or pedestrian flow

14. Installation of roundabouts or traffic circles

15. Installation or reconfiguration of traffic calming devices

16. Adoption of or increase in tolls

17. Addition of tolled lanes, where tolls are sufficient to mitigate any potential VMT increase

18. Initiation of new transit service

19. Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes

20. Removal or relocation of off-street or on-street parking spaces

21. Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)

22. Addition of traffic wayfinding signage

23. Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way

24. Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel

25. Installation of publicly available alternative fuel/charging infrastructure

26. 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

27. Roadway striping modifications that don't change the number of through lanes

Regardless of the project type and analysis method, projects that would be expected to have a significant VMT increase would be expected to consider mitigation measures. Potential mitigation measures would include:

- Deploy management strategies (e.g., pricing, vehicle occupancy requirements) on roadways or roadway lanes.
- Improve pedestrian or bicycle networks, or transit service.

Additional mitigation measures may become acceptable as agencies continue to innovate and find new ways to reduce vehicular travel.

PART II – LOCAL TRANSPORTATION ANALYSIS

7.0 ROADWAY

It is recommended that consideration be given to preparation of a local transportation analysis (LTA) for all land development and transportation projects. This section describes the recommended methodology for analysis of local roadway conditions.

The purpose of the roadway analysis portion of an LTA is to forecast, describe, and analyze how a development will affect existing and future circulation infrastructure for users of the roadway system, including vehicles, bicycles, pedestrians and transit. The LTA assists transportation engineers and planners in both the development community and public agencies when making land use, mobility infrastructure, and other development decisions. An LTA quantifies the expected changes in transportation conditions and translates these changes into transportation system impacts in the vicinity of a project.

The roadway transportation analysis included in an LTA is separate from the transportation impact analysis conducted as part of the environmental (CEQA) project review process, as described in Part I. The purpose of the roadway transportation analysis is to ensure that all projects provide a fair share of roadway infrastructure improvements in order to accommodate their multimodal transportation demands.

The following guidelines were prepared to assist local agencies throughout the San Diego Region in promoting consistency and uniformity in local transportation studies. These guidelines do not establish a legal standard for these functions but are intended to supplement any individual manuals or level of service objectives for the various jurisdictions. These guidelines attempt to consolidate regional efforts to identify when an LTA is needed, what professional procedures should be followed, and what constitutes a significant traffic effect that should be dealt with.

The instructions outlined in these guidelines are subject to update as future conditions and experience become available. Special situations may call for variation from these guidelines. A scoping letter from the project applicant to the jurisdiction and the project applicant is recommended for each individual project to verify the application of these guidelines. Caltrans and lead agencies should agree on the specific methods used in local transportation analysis studies involving any State Route facilities, including metered and unmetered freeway ramps.

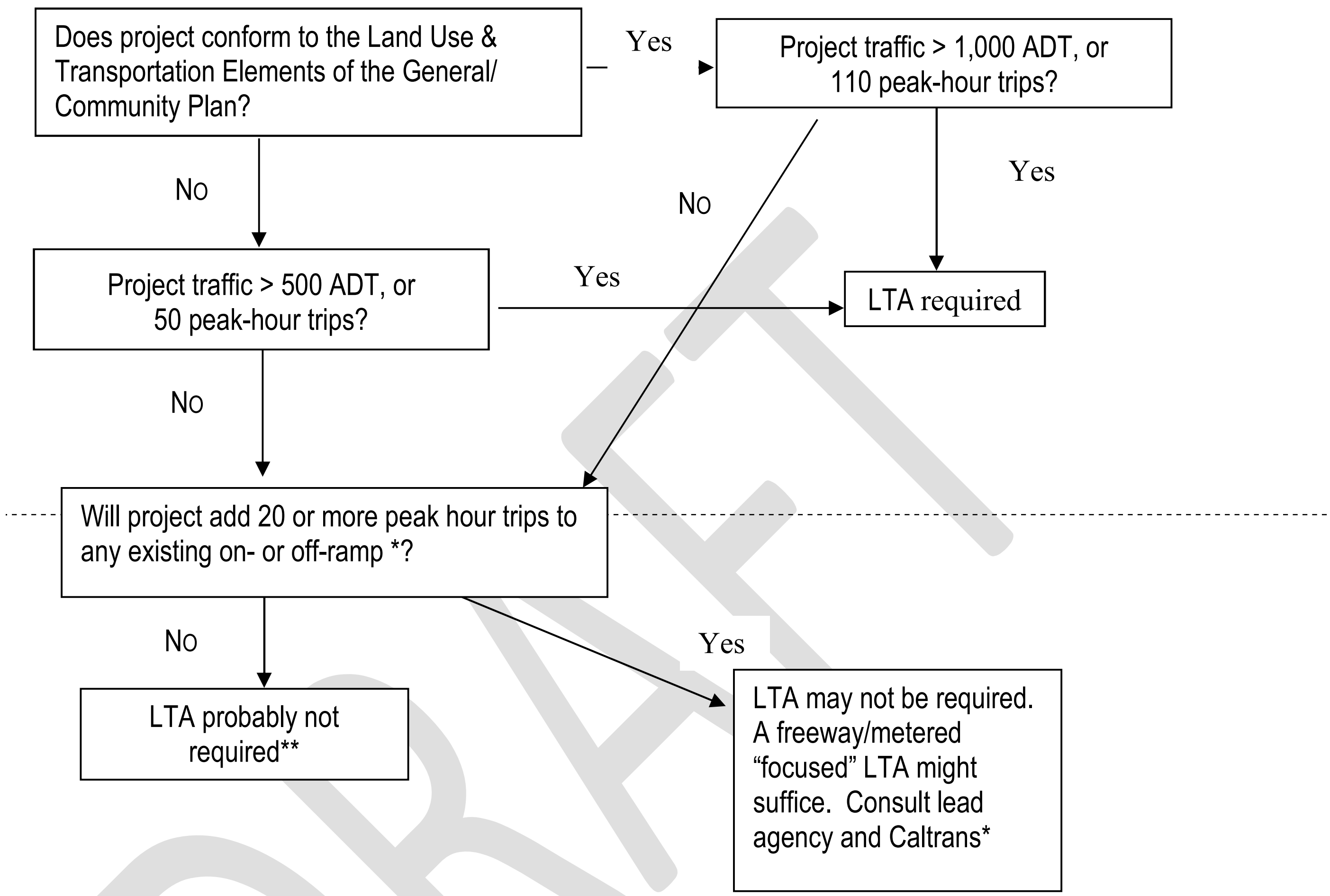
NEED FOR A STUDY

Figure 7-1 shows the flow chart for determination of when a roadway analysis should be conducted. A roadway analysis should be prepared for all projects which generate traffic greater than 1,000 total average daily driveway trips (ADT) or 100 peak-hour trips. If a proposed project is not in conformance with the land use and/or transportation element of the general or community plan, use threshold rates of 500 ADT or 50 peak-hour trips.

Early consultation with any affected jurisdictions is strongly encouraged since a “focused” or “abbreviated” roadway analysis may still be required – even if the above threshold rates are not met. An understanding of the level of detail and the assumptions required for the analysis should be reached. A pre-submittal in-person conference may not be a required; however, the applicant should prepare a scoping letter for the agency’s review and approval prior to preparation of the analysis.

Figure 7-1

FLOW CHART FOR LTA ROADWAY ANALYSIS



* Check with Caltrans for current ramp metering rates. (See Attachment B – Ramp Metering Analysis)

** However, for health and safety reasons, and/or local and residential street issues, an "abbreviated" or "focused" LTA may still be requested by a local agency. (For example, this may include traffic backed up beyond an off-ramp's storage capacity or may include diverted traffic through an existing neighborhood.)

*** Driveway trips would generally be used in this chart rather than total trips generated.

STUDY PARAMETERS

It is recommended that the geographic area examined in the LTA include the following for roadways:

- All local roadway segments between signalized intersections (including all State surface routes), intersections, and mainline freeway locations where the proposed project will add 50 or more peak-hour trips in either direction to the existing roadway traffic.
- All freeway entrance and exit ramps where the proposed project will add a substantial number of peak-hour trips to cause any traffic queues to exceed ramp storage capacities (see Figure 1). (NOTE: Care must be taken to include <u>other</u> ramps and intersections that may receive project traffic <u>diverted</u> as a result of already existing, or project causing congestion at freeway entrances and exits.)

The data used in the LTA should generally not be more than 2 years old and should not reflect a temporary interruption (special events, construction detour, etc.) in the normal traffic patterns unless that is the nature of the project itself. If recent traffic data is not available, current counts should be made by the project applicant/consultant. For areas near beaches or bays, counts should be taken during summer or adjusted to reflect summer conditions.

In general, the region-wide goal for roadway level-of-service (LOS) on all freeways, roadway segments, and intersections is "D." For central urbanized areas, the goal may be to achieve a level-of-service of "E". Individual jurisdictions have slightly different LOS objectives.

SCENARIOS TO BE STUDIED

The following scenarios are recommended to be addressed in the roadway analysis (unless there is concurrence with the lead agency(ies) that one or more of these scenarios may be omitted). Some exceptions are noted at the end of this list:

<u>Existing Conditions</u>: Document existing traffic levels and peak-hour levels of service in the study area. Identify locations where roadways do not meet target levels of service for existing conditions.

<u>Existing Plus Project Conditions:</u> Analyze the impacts of the proposed project in addition to existing conditions. This scenario identifies the effect of a project on the transportation network with no other changes in conditions.

<u>Near-term (approved and pending)</u>: Analyze the cumulative conditions resulting from the development of "other" approved and "reasonably foreseeable" pending projects (application on file) that are expected to influence the study area. This is the baseline against which project effects are assessed. The lead agency may be able to provide copies of the traffic studies for the "other" projects if they are already approved. If data is not available for near-term cumulative projects, an ambient growth factor should be used. If applicable, transportation network improvements should also be included in this scenario. This would include programmed and fully funded network improvements that are scheduled to open prior to the project's expected opening day.

<u>Near-term + Proposed Project</u>: Analyze the effects of the proposed project at its expected opening day in addition to near-term baseline conditions. For phased projects, a separate analysis could be conducted for each phase.

<u>Horizon Year:</u> Identify traffic forecasts, typically 20 years in the future, through the output of a SANDAG model forecast or other computer model approved by the local agency.

Horizon Year + Proposed Project: Analyze the additional project traffic impacts to the horizon year condition. When justified, and particularly in the case of very large developments or new general/community plans, a transportation model should be run with, and without, the additional development to show the net impacts on all parts of the area's transportation system.

Analysis of near-term scenarios may not be necessary if this scenario is incorporated in the agency's Traffic Impact Fee (TIF) program. If an agency has established a fee program to cover near-term improvements on all key roadways, the payment of traffic impact fees could be considered to be sufficient to offset a project's effect on these roadways.

Horizon year studies may not be needed, depending on the discretion of the lead agency. Reasons for including these scenarios may vary, but they would generally be added because the proposed project is substantially different than was expected in the Community Plan/General Plan or if the area near the project is expected to experience land use or network changes that have not been adequately accounted for in previous planning studies.

In order to use LOS criteria to determine the need for roadway improvements (see Table 7-1), proposed model or manual forecast adjustments must be made to address scenarios both with and without the project. Model data should be carefully verified to ensure accurate project and "other" cumulative project representation. In these cases, regional or subregional models conducted by SANDAG need to be reviewed for appropriateness.

PROJECT TRAFFIC GENERATION

Use of SANDAG [Traffic Generators manual and (Not So) Brief Guide….] or City of San Diego (Trip Generation Manual) rates should first be considered. Trip generation rates from ITE's latest Trip Generation manual or ITE Journal articles could also be considered. Smart growth projects should consider use of the SANDAG Smart Growth Trip Generation and Parking Study guidelines. If local and sufficient national data do not exist, conduct trip generation studies at multiple sites with characteristics similar to those of the proposed project.

Reasonable reductions to trip rates may also be considered: (a) with proper analysis of pass-by and diverted traffic on adjacent roadways, (b) for developments near transit stations, and (c) for mixed-use developments. (Note: Caltrans and local agencies may use different trip reduction rates. Early consultation with the reviewing agencies is strongly recommended.)

Project trips can be assigned and distributed either manually or by a computer model based upon review and approval of the local agency Traffic Engineer. The magnitude of the proposed project will usually determine which method is employed.

If the manual method is used, the trip distribution percentages could be derived from existing local traffic patterns or optionally (with local agency approval) by professional judgement.

If the computer model is used, the trip distribution percentages could be derived from a computer generated "select zone assignment". The centroid connectors should accurately represent project access to the street network. Preferably the project would be represented by its own traffic zone. Some adjustments to the output volumes may be needed (especially at intersections) to smooth out volumes, quantify peak volumes, adjust for pass-by and diverted trips, and correct illogical output.

ANALYSIS OF PROJECT EFFECT ON THE ROADWAY SYSTEM

It is recommended that the roadway analysis determine the effect that a project will have for each of the previously outlined study scenarios. Peak-hour capacity analyses for freeways, roadway segments (ADTs may be used here to estimate V/C ratios), intersections, and freeway ramps can be conducted for existing, near-term, and long-term conditions. The methodologies used in determining the traffic impact are not only critical to the validity of the analysis, they are pertinent to the credibility and confidence the decision-makers have in the resulting findings, conclusions, and recommendations. Methodologies for roadway capacity analyses vary by agency and change over time so it is recommended that consultation be conducted with the lead agency and/or Caltrans to determine an appropriate methodology for a particular study.

NEED FOR ROADWAY IMPROVEMENTS

Table 7-1 indicates when a project's effect on the roadway system is considered to justify need for roadway improvements. That is, if a project's traffic effect causes the values in this table to be exceeded, roadway improvements should be considered. Table 7-2 provides guidance on the levels of ADT that can be accommodated on various types of roadways, based on level of service.

It is the responsibility of Caltrans, on Caltrans initiated projects, to analyze the effect of ramp metering, for initial as well as future operational impacts, on local streets that intersect and feed entrance ramps to the freeway. Developers and/or local agencies, however, should consider improvements to existing ramp meter facilities, future ramp meter installations, or local streets, when those impacts are attributable to new development and/or local agency roadway improvement projects.

Not all improvement measures can feasibly consist of roadway widening (new lanes or new capacity). A sample improvement might include financing toward a defined ITS (Intelligent Transportation System) project, enhanced traffic signal communications project, or active transportation projects. This type of improvement would allow a project applicant (especially with a relatively small project) to provide improvements to the roadway system by paying into a local or regional fee program, providing the fee can be established in the near future.

Other mitigation measures may include Transportation Demand Management recommendations – transit facilities, bike facilities, walkability, telecommuting, traffic rideshare programs, flex-time, carpool incentives, parking cash-out, complete or partial subsidization of transit passes, etc. Additional mitigation measures may be identified as future technologies and policies evolve.

Table 7-1

DETERMINATION OF THE NEED FOR ROADWAY IMPROVEMENTS

LEVEL OF SERVICE WITH PROJECT*	ALLOWABLE CHANGE DUE TO PROJECT EFFECT**					
	FREEWAYS		ROADWAY SEGMENTS		INTERSECTIONS	RAMP*** METERING
	V/C	SPEED (MPH)	V/C	SPEED (MPH)	DELAY (SEC.)	DELAY(MIN.)
E, & F (OR RAMP METER DELAYS ABOVE 15 MIN.)	**0.01**	**1**	**0.02**	**1**	**2**	**2**

NOTES:

* All level of service measurements are based upon Highway Capacity Manual (HCM) procedures for peak-hour conditions. However, V/C ratios for Roadway Segments may be estimated on an ADT/24-hour traffic volume basis (using Table 7-2 or a similar LOS chart for each jurisdiction). The target LOS for freeways, roadways, and intersections is generally “D”. For metered freeway ramps, LOS does not apply; However, ramp meter delays above 15 minutes are considered excessive.

** If a proposed project’s traffic causes the values shown in the table to be exceeded, the effects of the project are determined to justify improvements. These changes may be measured from appropriate computer programs or expanded manual spreadsheets. The project applicant shall then identify feasible improvements within the LTA report that will maintain the traffic facility at the target LOS or restore to pre-project conditions. If the LOS with the proposed project becomes worse than the target (see above * note), or if the project adds a significant amount of peak-hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, roadway improvements should be considered.

*** See Attachment B for ramp metering analysis.

KEY:
- V/C = Volume to Capacity ratio
- Speed = Speed measured in miles per hour
- Delay = Average stopped delay per vehicle measured in seconds for intersections, or minutes for ramp meters
- LOS = Level of Service

Table 7-2

ROADWAY CLASSIFICATIONS, LEVELS OF SERVICE (LOS) AND AVERAGE DAILY TRAFFIC (ADT)

			LEVEL OF SERVICE W/ADT				
STREET CLASSIFICATION	LANES		A	B	C	D	E
Expressway	6 lanes		30,000	42,000	60,000	70,000	80,000
Prime Arterial	6 lanes		25,000	35,000	50,000	55,000	60,000
Major Arterial	6 lanes		20,000	28,000	40,000	45,000	50,000
Major Arterial	4 lanes		15,000	21,000	30,000	35,000	40,000
Major Arterial (One-Way)	3 lanes		12,500	16,500	22,500	25,000	27,500
Major Arterial (One-Way)	2 lanes		10,000	13,000	17,500	20,000	22,500
Secondary Arterial/ Collector	4 lanes		10,000	14,000	20,000	25,000	30,000
Collector (no center lane)	4 lanes		5,000	7,000	10,000	13,000	15,000
Collector (continuous left-turn lane)	2 lanes		5,000	7,000	10,000	13,000	15,000
Collector (no fronting property)	2 lanes		4,000	5,500	7,500	9,000	10,000
Collector (commercial- industrial fronting)	2 lanes		2,500	3,500	5,000	6,500	8,000
Collector (multi-family)	2 lanes		2,500	3,500	5,000	6,500	8,000
Collector (One-Way)	3 lanes		11,000	14,000	19,000	22,500	26,000
Collector (One-Way)	2 lanes		7,500	9,500	12,500	15,000	17,500
Collector (One-Way)	1 lane		2,500	3,500	5,000	6,500	7,500
Sub-Collector (single-family)	2 lanes		---	---	2,200	---	---

NOTES:

1. The volumes and the average daily level of service listed above are only intended as a general planning guideline.
2. Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

8.0 TRANSIT

It is recommended that the geographic area examined in the LTA include the following for transit:

- All existing transit lines and transit stops within a ½ mile walking distance of the project
- Any planned transit lines or upgrades within a ½ mile walking distance of the project

In general, the region-wide goal for evaluating pedestrian, bicycle, and transit facilities is to identify opportunities to increase connectivity, frequency of service, and level of comfort. Individual jurisdictions may have different qualitative or quantitative ways of performing these evaluations.

9.0 BICYCLE

It is recommended that the geographic area examined in the LTA include the following for bicycle travel:

- All roadways adjacent to the project, extending in each direction to the nearest intersection with a classified roadway or with a Class I path
- Both directions of travel should be evaluated

In general, the region-wide goal for evaluating pedestrian, bicycle, and transit facilities is to identify opportunities to increase connectivity and level of comfort. Individual jurisdictions may have different qualitative or quantitative ways of performing these evaluations.

10.0 PEDESTRIAN

It is recommended that the geographic area examined in the LTA include the following for pedestrians:

- All pedestrian facilities directly connected to project access points or adjacent to the project development, extending in each direction to the nearest intersection with a classified roadway or connection with a Class I path
- Facilities connecting to transit stops within two blocks of the project
- Only facilities on the side of the project or along the walking route to transit stop
- Additional geographic areas may be included in certain cases to address special cases such as schools or retail centers

In general, the region-wide goal for evaluating pedestrian, bicycle, and transit facilities is to identify opportunities to increase connectivity and level of comfort. Individual jurisdictions may have different qualitative or quantitative ways of performing these evaluations.

APPENDICES

GUIDELINES FOR TRANSPORTATION IMPACT STUDIES IN THE SAN DIEGO REGION

APPENDIX A

ATTACHMENT A

Completed by Staff:
Date Received ___________________
Reviewer ______________________
Date Screen Check ______________

TRAFFIC IMPACT STUDY
SCREEN CHECK

To be completed by consultant (including page #):
Name of Traffic Study ____
Consultant ____
Date Submitted ____

Indicate Page # in report:				Satisfactory YES	Satisfactory NO	NOT REQUIRED
pg. ___	1.	Table of contents, list of figures and list of tables.		☐	☐	
pg. ___	2.	Executive summary.		☐	☐	
pg. ___	3.	Map of the proposed project location.		☐	☐	
	4.	General project description and background information:				
pg. ___		a.	Proposed project description (acres, dwelling units….)	☐	☐	
pg. ___		b.	Total trip generation of proposed project.	☐	☐	
pg. ___		c.	Community plan assumption for the proposed site.	☐	☐	
pg. ___		d.	Discuss how project affects the Congestion Management Program, if applicable	☐	☐	
pg. ___	5.	Parking, transit and on-site circulation discussions are included.		☐	☐	
pg. ___	6.	Map of the Transportation Impact Study Area and specific intersections studied in the traffic report.		☐	☐	
pg. ___	7.	Existing Transportation Conditions:				
		a.	Figure identifying roadway conditions including raised medians, median openings, separate left and right turn lanes, roadway and intersection dimensions, bike lanes, parking, number of travel lanes, posted speed, intersection controls, turn restrictions and intersection lane configurations.	☐	☐	
		b.	Figure indicating the daily (ADT) and peak-hour volumes.	☐	☐	
		c.	Figure or table showing level of service (LOS) for intersections during peak hours and roadway sections within the study area (include analysis sheets in an appendix).	☐	☐	
	8.	Project Trip Generation:				
pg. ___		Table showing the calculated project generated daily (ADT) and peak hour volumes.		☐	☐	
pg. ___	9.	Project Trip Distribution using the current TRANPLAN Computer Traffic Model (provide a computer plot) or manual assignment if previously approved. (Identify which method was used.)		☐	☐	
	10.	Project Traffic Assignment:				
pg. ___		a.	Figure indicating the daily (ADT) and peak-hour volumes.	☐	☐	
pg. ___		b.	Figure showing pass-by-trip adjustments, and, if cumulative trip rates are used.	☐	☐	☐
	11.	Existing Near-term Cumulative Conditions:				
pg. ___		a.	Figure indicating the daily (ADT) and peak-hour volumes.	☐	☐	
pg. ___		b.	Figure or table showing the projected LOS for intersections during peak hours and roadway sections within the study area	☐	☐	

Indicate Page # in report:				Satisfactory YES	NO	NOT REQUIRED
			(analysis sheets included in the appendix).			
pg. ___		c.	Traffic signal warrant analysis (Caltrans Traffic Manual) for appropriate locations.	☐	☐	
	12.		Existing Near-term Cumulative Conditions + Proposed Project (each phase when applicable)			
pg. ___		a.	Figure or table showing the projected LOS for intersections during peak hours and roadway sections with the project (analysis sheets included in the appendix).	☐	☐	
pg. ___		b.	Figure showing other projects that were included in the study, and the assignment of their site traffic.	☐	☐	
pg. ___		c.	Traffic signal warrant analysis for appropriate locations.	☐	☐	
	13.		Horizon Year Transportation Conditions (if project conforms to the General/ Community Plan):			
pg. ___		a.	Horizon Year ADT and street classification that reflect the Community Plan.	☐	☐	☐
pg. ___		b.	Figure or table showing the horizon LOS for intersections during peak hours and roadway sections <u>with</u> and <u>without</u> the project (analysis sheets included in the appendix).	☐	☐	☐
pg. ___		c.	Traffic signal warrant analysis at appropriate locations.	☐	☐	☐
	14.		Horizon Year Transportation Conditions + Proposed Project (if project does not conform to the General/Community Plan):			
pg. ___		a.	Horizon Year ADT and street classification as shown in the Community Plan.	☐	☐	☐
pg. ___		b.	Horizon Year ADT and street classification for two scenarios: with the proposed project and with the land use assumed in the Community Plan.	☐	☐	☐
pg. ___		c.	Figure or table showing the horizon LOS for intersections during peak hours and roadway sections for two scenarios: <u>with</u> and <u>without</u> the proposed project and with the land use assumed in the Community Plan (analysis sheets included in the appendix).	☐	☐	☐
pg. ___		d.	Traffic signal warrant analysis at appropriate locations with the land use assumed in the General/Community Plan.	☐	☐	☐
pg. ___	15.		A summary table showing the comparison of Existing, Existing + Near-term Cumulative, Existing + Near-term Cumulative + Proposed Project, Horizon Year, and Horizon Year + Proposed Project (if different from General/Community Plan), LOS on roadway sections and intersections during peak hours.	☐	☐	
pg. ___	16.		A summary table showing the project's "significant traffic impacts."	☐	☐	
	17.		Transportation Mitigation Measures:			
pg. ___		a.	Table identifying the mitigations required that are the responsibility of the developer and others. A phasing plan is required if mitigations are proposed in phases.	☐	☐	
pg. ___		b.	Figure showing all proposed mitigations that include: intersection lane configurations, lane widths, raised medians, median openings, roadway and intersection dimensions, right-of-way, offset, etc.	☐	☐	
pg. ___	18.		The Highway Capacity Manual Operation Method or other approved method is used at appropriate locations within the study area.	☐	☐	

Indicate Page # in report:		Satisfactory YES	NO	NOT REQUIRED
pg. ___	19. Analysis complies with Congestion Management Program requirements.	☐	☐	☐
pg. ___	20. Appropriate freeway analysis is included.	☐	☐	☐
pg. ___	21. Appropriate freeway ramp metering analysis is included.	☐	☐	☐
pg. ___	22. The traffic study is signed by a California Registered Traffic Engineer.	☐	☐	

THE TRAFFIC STUDY SCREEN CHECK FOR THE SUBJECT PROJECT IS:

_____________ Approved

_____________ Not approved because the following items are missing:

____

____

____

APPENDIX B

ATTACHMENT B

RAMP METERING ANALYSIS

Ramp metering analysis should be performed for each horizon year scenario in which ramp metering is expected. The following table shows relevant information that should be included in the ramp meter analysis "Summary of Freeway Ramp Metering Impacts."

LOCATION	DEMAND (veh/hr)[1]	METER RATE (veh/hr)[2]	EXCESS DEMAND (veh/hr)[3]	DELAY (min)[4]	QUEUE (feet)[5]

NOTES:

[1] DEMAND is the peak hour demand expected to use the on-ramp.

[2] METER RATE is the peak hour capacity expected to be processed through the ramp meter. This value should be obtained from Caltrans. Contact Carolyn Rumsey at (619) 467-3029.

[3] EXCESS DEMAND = (DEMAND) – (METER RATE) or zero, whichever is greater.

[4] $$\text{DELAY} = \frac{\text{EXCESS DEMAND}}{\text{METER RATE}} \times 60 \text{ MINUTES/HOUR}$$

[5] QUEUE = (EXCESS DEMAND) X 29 feet/vehicle

NOTE: Delay will be less at the beginning of metering. However, since peaks will almost always be more than one hour, delay will be greater after the first hour of metering. (See discussion on next page.)

SUMMARY OF FREEWAY RAMP METERING IMPACTS
(Lengthen as necessary to include all impacted meter locations)

LOCATION(S)	PEAK HOUR	PEAK HOUR DEMAND D	FLOW (METER RATE) F	EXCESS DEMAND E	DELAY (MINUTES)	QUEUE Q (feet)
	AM PM					
	AM PM					
	AM PM					

DISCUSSION OF RAMP METER ANALYSIS

A. CAUTION: The ramp metering analysis shown in Attachment B may lead to grossly understated results for delay and queue length, since important aspects of queue growth are ignored. Also, the draft guidelines method derives average values instead of maximum values for delay and queue length. Utilizing average values instead of maximum values can lead to obscuring important effects, particularly in regard to queue length.

Predicting ramp meter delays and queues requires a storage-discharge type of analysis, where a pattern of arriving traffic at the meter is estimated by the analyst, and the discharge, or meter rate, is a somewhat fixed value set by Caltrans for each individual metered ramp.

Since a ramp meter queue continues to grow longer during all times that the arrival rate exceeds the discharge rate, the maximum queue length (and hence, the maximum delay) usually occurs after the end of the peak (or highest) one hour. This leads to the need for an analysis for the entire time period during which the arrival rate exceeds the meter rate, not just the peak hour. For a similar reason, the analysis needs to consider that a substantial queue may have already formed by the beginning of the “peak hour.” Traffic arriving during the peak hour is then stacked onto an existing queue, not just starting from zero as the draft analysis suggests.

Experience shows that the theoretical queue length derived by this analysis often does not materialize. Motorists, after a brief time of adjustment, seek alternate travel paths or alternate times of arrival at the meter. The effect is to approximately minimize total trip time by seeking out the best combinations of route and departure time at the beginning of the trip. This causes at least two important changes in the pattern or arriving traffic at ramp meters. First, the peak period is spread out, with some traffic arriving earlier and some traffic arriving later than predicted. Second, a significant proportion of the predicted arriving traffic will use another ramp, use another freeway, or stay on surface streets.

It is acceptable to make reasonable estimates of these temporal and spatial (time and occupying space) diversions as long as all assumptions are stated and that the unmodified, or theoretical values are shown for comparison.

B. Additional areas for study include being able to define acceptable levels of service (LOS) and “significant” thresholds (e.g., a maximum ramp meter delay of 15 minutes) for metered freeway entrance ramps.

Currently there are no acceptable software programs for measuring project impacts on metered freeway ramps nor does the Highway Capacity Manual (HCM) adequately address this issue. Hopefully in the near future a regionwide study will be initiated to determine what metering rate (at each metered ramp) would be required in order to guarantee that traffic will flow (even at LOS “E”) on the entire freeway system during peak-hour conditions. From this, the ramp delays and resultant queue lengths might then be calculated. Overall, this is a very complex issue that needs considerable research and refinement in cooperation with Caltrans.

APPENDIX C

LEVEL OF SERVICE (LOS) DEFINITIONS (generally used by Caltrans)

The concept of Level of Service (LOS) is defined as a qualitative measure describing operational conditions within a traffic stream, and their perception by motorists and/or passengers. A Level of Service[s] definition generally describes these conditions in terms of such factors as speed, travel time, freedom to maneuver, comfort and convenience, and safety. Levels of Service definitions can generally be categorized as follows:

LOS	D/C*	Congestion/Delay	Traffic Description
		(Used for freeways, expressways and conventional highways[A])	
"A"	<0.41	None	Free flow.
"B"	0.42-0.62	None	Free to stable flow, light to moderate volumes.
"C"	0.63-0.79	None to minimal	Stable flow, moderate volumes, freedom to maneuver noticeably restricted.
"D"	0.80-0.92	Minimal to substantial	Approaches unstable flow, heavy volumes, very limited freedom to maneuver.
"E"	0.93-1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor.
		(Used for conventional highways)	
"F"	>1.00	Considerable	Forced or breakdown. Delay measured in average flow, travel speed (MPH). Signalized segments experience delays >60.0 seconds/vehicle.
		(Used for freeways and expressways)	
"F0"	1.01-1.25	Considerable 0-1 hour delay	Forced flow, heavy congestion, long queues form behind breakdown points, stop and go.
"F1"	1.26-1.35	Severe 1-2 hour delay	Very heavy congestion, very long queues.
"F2"	1.36-1.45	Very severe 2-3 hour delay	Extremely heavy congestion, longer queues, more numerous breakdown points, longer stop periods.
"F3"	>1.46	Extremely severe 3+ hours of delay	Gridlock.

[s] Level of Service can generally be calculated using "Table 3.1. LOS Criteria for Basic Freeway Sections" from the latest Highway Capacity Manual. However, contact Caltrans for more specific information on determining existing "free-flow" freeway speeds.

* Demand/Capacity ratio used for forecasts (V/C ratio used for operational analysis, where V = volume)

[A] Arterial LOS is based upon average "free-flow" travel speeds, and should refer to definitions in Table 11.1 in the HCM.

Appendix C
SANDAG SB-743 VMT Analysis Results

City of Encinitas Base Yr VMT

Encinitas Tracts	**Employees**	**VMT**	**VMT/Emp**	**Employees**	**VMT**	**VMT/Emp**
17701	451	11483.76	25.4628846	5418	109320	20.17718
17702	949	26211.43	27.620052	2924	58035.45	19.84796
17501	6177	179530.8	29.0643991	2921	57235.4	19.59445
17401	2922	88041.59	30.1305912	5549	114894.6	20.70546
17303	2264	72519.45	32.0315587	3018	65928.58	21.84512
17305	217	6364.836	29.3310397	2998	66740.82	22.26178
17106	1962	67354.88	34.3297019	5244	141295.2	26.94417
17404	1347	38969	28.9302129	6384	128591.7	20.14281
17502	2325	66242.19	28.4912657	3349	53623.74	16.01187
17403	1644	46879.59	28.5155637	4916	100594.6	20.46269
17110	1464	46524.02	31.7786989	10929	244111.9	22.33616
17104	707	18955.2	26.8107442	3887	80645.88	20.74759
17108	3014	84242	27.950232	4655	91943.33	19.75152
17604	4246	120304.7	28.3336604	6974	129598.4	18.58308
17603	754	20785.97	27.5676053	2496	51520.71	20.64131
17601	3259	93915.64	28.8173169	4824	101550.8	21.05117
17107	1415	38528.02	27.2282845	2878	53255.58	18.50437
ENCINITAS TOTAL	**35117**	**1026853**	**29.240911**	**79364**	**1648887**	**20.77625**

Vehicle Miles of Travel Report

Scenario ID **989**

Fox Farm Follow Up - 2012 - Coaster Cities

VMT per Resident

	Scenario ID	Residents	Total Trips	Person Miles of Travel	Vehicle Miles of Travel	VMT per Resident
Regionwide	989	3,129,417	11,211,651	73,624,387	54,858,289	17.5
Coaster Cities	989	354,608	1,303,856	8,697,391	6,650,813	18.8

VMT per Employee

	Scenario ID	Employees	Total Trips	Person Miles of Travel	Vehicle Miles of Travel	VMT per Employee
Regionwide	989	1,491,487	5,238,830	43,831,152	38,461,147	25.8
Coaster Cities	989	159,727	585,675	4,802,020	4,158,391	26.0

Report Generated: 04/20/20

SANDAG

Vehicle Miles of Travel Report

Scenario ID **989** **Fox Farm Follow Up - 2012 - North County Cities**

VMT per Resident

	Scenario ID	Residents	Total Trips	Person Miles of Travel	Vehicle Miles of Travel	VMT per Resident
Regionwide	989	3,129,417	11,211,651	73,624,387	54,858,289	17.5
North County Cities	989	731,710	2,641,577	16,785,820	12,639,014	17.3

VMT per Employee

	Scenario ID	Employees	Total Trips	Person Miles of Travel	Vehicle Miles of Travel	VMT per Employee
Regionwide	989	1,491,487	5,238,830	43,831,152	38,461,147	25.8
North County Cities	989	324,870	1,185,554	9,610,765	8,314,783	25.6

Report Generated: 04/20/20

SANDAG

Vehicle Miles of Travel Report

Scenario ID **991** **Fox Farm Follow Up - 2020 - Coaster Cities**

VMT per Resident

	Scenario ID	Residents	Total Trips	Person Miles of Travel	Vehicle Miles of Travel	VMT per Resident
Regionwide	991	3,435,715	12,302,411	77,559,665	56,353,219	16.4
Coaster Cities	991	376,925	1,388,495	8,833,092	6,622,700	17.6
					5	

VMT per Employee

	Scenario ID	Employees	Total Trips	Person Miles of Travel	Vehicle Miles of Travel	VMT per Employee
Regionwide	991	1,444,771	4,995,914	41,235,140	35,989,589	24.9
Coaster Cities	991	156,191	571,619	4,529,232	3,871,128	24.8

Report Generated: 03/15/20

SANDAG

Vehicle Miles of Travel Report

Scenario ID **991**

Fox Farm Follow Up - 2020 - North County Cities

VMT per Resident

	Scenario ID	Residents	Total Trips	Person Miles of Travel	Vehicle Miles of Travel	VMT per Resident
Regionwide	991	3,435,715	12,302,411	77,559,665	56,353,219	16.4
North County Cities	991	791,694	2,843,207	17,113,672	12,559,318	15.9

VMT per Employee

	Scenario ID	Employees	Total Trips	Person Miles of Travel	Vehicle Miles of Travel	VMT per Employee
Regionwide	991	1,444,771	4,995,914	41,235,140	35,989,589	24.9
North County Cities	991	310,186	1,115,093	8,799,093	7,544,024	24.3

Report Generated: 03/15/20

SANDAG

Vehicle Miles of Travel Report

Scenario ID **991**

Fox Farm - 2020 - TAZ 1445

VMT per Resident

		Scenario ID	Residents	Total Trips	Person Miles of Travel	Vehicle Miles of Travel	VMT per Resident
Regionwide		991	3,435,715	12,302,411	77,559,665	56,353,219	16.4
Jurisdiction	Encinitas	991	62,923	236,032	1,569,109	1,191,850	18.9
CPA							
TAZ 1445		991	338	1,330	8,638	6,311	**18.7**

VMT per Employee

		Scenario ID	Employees	Total Trips	Person Miles of Travel	Vehicle Miles of Travel	VMT per Employee
Regionwide		991	1,444,771	4,995,914	41,235,140	35,989,589	24.9
Jurisdiction	Encinitas	991	26,102	96,085	828,074	715,133	27.4
CPA							
TAZ 1445		991	130	477	4,287	3,587	**27.6**

Report Generated: 11/05/19

SANDAG

Appendix D
CAPCOA Fact Sheets

3.1.3 Increase Diversity of Urban and Suburban Developments (Mixed Use)

Range of Effectiveness: 9-30% vehicle miles traveled (VMT) reduction and therefore 9-30% reduction in GHG emissions.

Measure Description:

Having different types of land uses near one another can decrease VMT since trips between land use types are shorter and may be accommodated by non-auto modes of transport. For example when residential areas are in the same neighborhood as retail and office buildings, a resident does not need to travel outside of the neighborhood to meet his/her trip needs. A description of diverse uses for urban and suburban areas is provided below.

Urban:

The urban project will be predominantly characterized by properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with functional interrelationships and a coherent physical design. The mixed-use development should encourage walking and other non-auto modes of transport from residential to office/commercial/institutional locations (and vice versa). The residential units should be within ¼-mile of parks, schools, or other civic uses. The project should minimize the need for external trips by including services/facilities for day care, banking/ATM, restaurants, vehicle refueling, and shopping.

Suburban:

The suburban project will have at least three of the following on site and/or offsite within ¼-mile: Residential Development, Retail Development, Park, Open Space, or Office. The mixed-use development should encourage walking and other non-auto modes of transport from residential to office/commercial locations (and vice versa). The project should minimize the need for external trips by including services/facilities for day care, banking/ATM, restaurants, vehicle refueling, and shopping.

Measure Applicability:

- Urban and suburban context
- Negligible impact in a rural context (unless the project is a master-planned community)
- Appropriate for mixed-use projects

Baseline Method:

See introduction to transportation section for a discussion of how to estimate trip rates and VMT. The CO_2 emissions are calculated from VMT as follows:

$$CO_2 = VMT \times EF_{running}$$

Where:

VMT = vehicle miles traveled

$EF_{running}$ = emission factor for running emissions

Inputs:

The following information needs to be provided by the Project Applicant:

- Percentage of each land use type in the project (to calculate land use index)

Mitigation Method:

% VMT Reduction = Land Use * B [not to exceed 30%]

Where

Land Use = Percentage increase in land use index versus single use development

= (land use index – 0.15)/0.15 (see Appendix C for detail)

Land use index = -a / ln(6) (from [2])

$$a = \sum_{i=1}^{6} a_i \times \ln(a_i)$$

a_i = building floor area of land use i / total square feet of area considered

- a_1 = single family residential
- a_2 = multifamily residential
- a_3 = commercial
- a_4 = industrial
- a_5 = institutional
- a_6 = park

if land use is not present and a_i is equal to 0, set a_i equal to 0.01

B = elasticity of VMT with respect to land use index (0.09 from [1])

not to exceed 500% increase

Assumptions:

Data based upon the following references:

[1] Ewing, R., and Cervero, R., "Travel and the Built Environment - A Meta-Analysis." *Journal of the American Planning Association*, <to be published> (2010). Table 4.

[2] Song, Y., and Knaap, G., “Measuring the effects of mixed land uses on housing values.” *Regional Science and Urban Economics 34 (2004) 663-680.* (p. 669) http://urban.csuohio.edu/~sugie/papers/RSUE/RSUE2005_Measuring%20the%20effects%20of%20mixed%20land%20use.pdf

Emission Reduction Ranges and Variables:

Pollutant	Category Emissions Reductions[36]
CO_2e	9-30% of running
PM	9-30% of running
CO	9-30% of running
NOx	9-30% of running
SO_2	9-30% of running
ROG	5.4-18% of total

Discussion:

In the above calculation, a land use index of 0.15 is used as a baseline representing a development with a single land use (see Appendix C for calculations).

There are two separate maxima noted in the fact sheet: a cap of 500% on the allowable percentage increase of land use index (variable A) and a cap of 30% on % VMT reduction. The rationale for the 500% cap is that there are diminishing returns to any change in environment. For example, it is reasonably doubtful that increasing the land use index by a factor of six instead of five would produce any additional change in travel behavior. The purpose for the 30% cap is to limit the influence of any single environmental factor (such as diversity). This emphasizes that community designs that implement multiple land use strategies (such as density, design, diversity, etc.) will show more of a reduction than relying on improvements from a single land use factor.

[36] The percentage reduction reflects emission reductions from running emissions. The actual value will be less than this when starting and evaporative emissions are factored into the analysis. ROG emissions have been adjusted to reflect a ratio of 40% evaporative and 60% exhaust emissions based on a statewide EMFAC run of all vehicles.

Example:

Sample calculations are provided below:

90% single family homes, 10% commercial

- Land use index = -[0.9*ln(0.9)+ 0.1*ln(0.1)+ 4*0.01*ln(0.01)] / ln(6) = 0.3
- Low Range % VMT Reduction = (0.3 – 0.15)/0.15 *0.09 = 9%

1/6 single family, 1/6 multi-family, 1/6 commercial, 1/6 industrial, 1/6 institutional, 1/6 parks

- Land use index = -[6*0.17*ln(0.17)] / ln(6) = 1
- High Range % VMT Reduction (land use index = 1)
- Land use = (1-0.15)/0.15 = 5.6 or 566%. Since this is greater than 500%, set to 500%.
- % VMT Reduction = (5 x 0.09) = 0.45 or 45%. Since this is greater than 30%, set to 30%.

Preferred Literature:

- -0.09 = elasticity of VMT with respect to land use index

The land use (or entropy) index measurement looks at the mix of land uses of a development. An index of 0 indicates a single land use while 1 indicates a full mix of uses. Ewing's [1] synthesis looked at a total of 10 studies, where none controlled for self-selection[37]. The weighted average elasticity of VMT with respect to the land use mix index is -0.09. The methodology for calculating the land use index is described in Song and Knaap [2].

Alternative Literature:

- Vehicle trip reduction = [1 - (ABS(1.5*h-e) / (1.5*h+e)) - 0.25] / 0.25*0.03

Where :
h = study area housing units, and
e = study area employment.

Nelson\Nygaard's report [3] describes a calculation adapted from Criterion and Fehr & Peers [4]. The formula assumes an "ideal" housing balance of 1.5 jobs per household and a baseline diversity of 0.25. The maximum trip reduction with this method is 9%.

---

[37] Self selection occurs when residents or employers that favor travel by non-auto modes choose locations where this type of travel is possible. They are therefore more inclined to take advantage of the available options than a typical resident or employee might otherwise be.

Alternative Literature References:

[3] Nelson\Nygaard, 2005. Crediting Low-Traffic Developments (p.12). http://www.montgomeryplanning.org/transportation/documents/TripGenerationAnalysisUsingURBEMIS.pdf

[4] Criteron Planner/Engineers and Fehr & Peers Associates (2001). Index 4D Method. *A Quick-Response Method of Estimating Travel Impacts from Land-Use Changes*. Technical Memorandum prepared for US EPA, October 2001.

Other Literature Reviewed:

None

3.1.6 Integrate Affordable and Below Market Rate Housing

Range of Effectiveness: 0.04 – 1.20% vehicle miles traveled (VMT) reduction and therefore 0.04-1.20% reduction in GHG emissions.

Measure Description:

Income has a statistically significant effect on the probability that a commuter will take transit or walk to work [4]. BMR housing provides greater opportunity for lower income families to live closer to jobs centers and achieve jobs/housing match near transit. It also addresses to some degree the risk that new transit oriented development would displace lower income families. This strategy potentially encourages building a greater percentage of smaller units that allow a greater number of families to be accommodated on infill and transit-oriented development sites within a given building footprint and height limit. Lower income families tend to have lower levels of auto ownership, allowing buildings to be designed with less parking which, in some cases, represents the difference between a project being economically viable or not.

Residential development projects of five or more dwelling units will provide a deed-restricted low-income housing component on-site.

Measure Applicability:

- Urban and suburban context
- Negligible impact in a rural context unless transit availability and proximity to jobs/services are existing characteristics
- Appropriate for residential and mixed-use projects

Baseline Method:

See introduction to transportation section for a discussion of how to estimate trip rates and VMT. The CO_2 emissions are calculated from VMT as follows:

$$CO_2 = VMT \times EF_{running}$$

Where:

VMT = vehicle miles traveled

$EF_{running}$ = emission factor for running emissions

Inputs:

The following information needs to be provided by the Project Applicant:

- Percentage of units in project that are deed-restricted BMR housing

Mitigation Method:

% VMT Reduction = 4% * Percentage of units in project that are deed-restricted BMR housing [1]

Assumptions:

Data based upon the following references:

[1] Nelson\Nygaard, 2005. Crediting Low-Traffic Developments (p.15). http://www.montgomeryplanning.org/transportation/documents/TripGenerationAnalysisUsingURBEMIS.pdf

Criteron Planner/Engineers and Fehr & Peers Associates (2001). Index 4D Method. *A Quick-Response Method of Estimating Travel Impacts from Land-Use Changes*. Technical Memorandum prepared for US EPA, October 2001.

Holtzclaw, John; Clear, Robert; Dittmar, Hank; Goldstein, David; and Haas, Peter (2002), "Location Efficiency: Neighborhood and Socio-Economic Characteristics Determine Auto Ownership and Use – Studies in Chicago, Los Angeles and San Francisco", *Transportation Planning and Technology*, 25 (1): 1-27.

All trips affected are assumed average trip lengths to convert from percentage vehicle trip reduction to VMT reduction (%VT = %VMT)

Emission Reduction Ranges and Variables:

Pollutant	Category Emissions Reductions[42]
CO_2e	0.04 – 1.20% of running
PM	0.04 – 1.20% of running
CO	0.04 – 1.20% of running
NOx	0.04 – 1.20% of running
SO_2	0.04 – 1.20% of running
ROG	0.024 – 0.72% of total

Discussion:

At a low range, 1% BMR housing is assumed. At a medium range, 15% is assumed (based on the requirements of the San Francisco BMR Program[5]). At a high range, the San Francisco program is doubled to reach 30% BMR. Higher percentages of BMR are possible, though not discussed in the literature or calculated.

[42] The percentage reduction reflects emission reductions from running emissions. The actual value will be less than this when starting and evaporative emissions are factored into the analysis. ROG emissions have been adjusted to reflect a ratio of 40% evaporative and 60% exhaust emissions based on a statewide EMFAC run of all vehicles.

Example:

Sample calculations are provided below:

- Low Range % VMT Reduction = 4% * 1% = 0.04%
- High Range % VMT Reduction = 4% * 30% = 1.20%

Preferred Literature:

Nelson\Nygaard [1] provides a 4% reduction in vehicle trips for each deed-restricted BMR unit. This is calculated from Holtzclaw [3], with the following assumptions: 12,000 average annual VMT per vehicle, $33,000 median per capita income (2002 figures per CA State Department of Finance), and average income in BMR units 25% below median. With a coefficient of -0.0565 (estimate for VMT/vehicle as a function of $/capita) from [3], the VMT reduction is 0.0565*33,000*0.25/12,000 = 4%.

Alternative Literature:

- 50% greater transit school trips than higher income households

Fehr & Peers [6] developed Direct Ridership Models to predict the Bay Area Rapid Transit (BART) ridership activity. One of the objectives of this assessment was to understand the land use and system access factors that influence commute period versus off-peak travel on BART. The analysis focused on the Metropolitan Transportation Commission 2000 Bay Area Travel Survey [7], using the data on household travel behavior to extrapolate relationships between household characteristics and BART mode choice. The study found that regardless of distance from BART, lower income households generate at least 50% higher BART use for school trips than higher income households. More research would be needed to provide more applicable information regarding other types of transit throughout the state.

Other Literature Reviewed:

[4] Bento, Antonio M., Maureen L. Cropper, Ahmed Mushfiq Mobarak, and Katja Vinha. 2005. “The Effects of Urban Spatial Structure on Travel Demand in the United States.” *The Review of Economics and Statistics* 87,3: 466-478. (cited in Measure Description section)

[5] San Francisco BMR Program: http://www.ci.sf.ca.us/site/moh_page.asp?id=48083 (p.1) (cited in Discussion section).

[6] Fehr & Peers. *Access BART*. 2006.

[7] BATS. 2000. 2000 Bay Area Travel Survey.

3.2 Neighborhood/Site Enhancements

3.2.1 Provide Pedestrian Network Improvements

Range of Effectiveness: 0 - 2% vehicle miles traveled (VMT) reduction and therefore 0 - 2% reduction in GHG emissions.

Measure Description:

Providing a pedestrian access network to link areas of the Project site encourages people to walk instead of drive. This mode shift results in people driving less and thus a reduction in VMT. The project will provide a pedestrian access network that internally links all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the project site. The project will minimize barriers to pedestrian access and interconnectivity. Physical barriers such as walls, landscaping, and slopes that impede pedestrian circulation will be eliminated.

Measure Applicability:

- Urban, suburban, and rural context
- Appropriate for residential, retail, office, industrial and mixed-use projects
- Reduction benefit only occurs if the project has both pedestrian network improvements on site and connections to the larger off-site network.

Baseline Method:

See introduction to transportation section for a discussion of how to estimate trip rates and VMT. The CO_2 emissions are calculated from VMT as follows:

$$CO_2 = VMT \times EF_{running}$$

Where:

VMT = vehicle miles traveled

$EF_{running}$ = emission factor for running emissions

Inputs:

The project applicant must provide information regarding pedestrian access and connectivity within the project and to/from off-site destinations.

Mitigation Method:

Estimated VMT Reduction	Extent of Pedestrian Accommodations	Context
2%	Within Project Site and Connecting Off-Site	Urban/Suburban
1%	Within Project Site	Urban/Suburban
< 1%	Within Project Site and Connecting Off-Site	Rural

Assumptions:

Data based upon the following references:

- Center for Clean Air Policy (CCAP) Transportation Emission Guidebook. http://www.ccap.org/safe/guidebook/guide_complete.html (accessed March 2010)
- 1000 Friends of Oregon (1997) "Making the Connections: A Summary of the LUTRAQ Project" (p. 16): http://www.onethousandfriendsoforegon.org/resources/lut_vol7.html

Emission Reduction Ranges and Variables:

Pollutant	Category Emissions Reductions[45]
CO_2e	0 - 2% of running
PM	0 - 2% of running
CO	0 - 2% of running
NOx	0 - 2% of running
SO_2	0 - 2% of running
ROG	0 – 1.2% of total

Discussion:

As detailed in the preferred literature section below, the lower range of 1 – 2% VMT reduction was pulled from the literature to provide a conservative estimate of reduction potential. The literature does not speak directly to a rural context, but an assumption was made that the benefits will likely be lower than a suburban/urban context.

Example:

N/A – calculations are not needed.

Preferred Literature:

[45] The percentage reduction reflects emission reductions from running emissions. The actual value will be less than this when starting and evaporative emissions are factored into the analysis. ROG emissions have been adjusted to reflect a ratio of 40% evaporative and 60% exhaust emissions based on a statewide EMFAC run of all vehicles.

- 1 - 2% reduction in VMT

The Center for Clean Air Policy (CCAP) attributes a 1% reduction in VMT from pedestrian-oriented design assuming this creates a 5% decrease in automobile mode share (e.g. auto split shifts from 95% to 90%). This mode split is based on the Portland Regional Land Use Transportation and Air Quality (LUTRAQ) project. The LUTRAQ analysis also provides the high end of 10% reduction in VMT. This 10% assumes the following features:

- – Compact, mixed-use communities
- – Interconnected street network
- – Narrower roadways and shorter block lengths
- – Sidewalks
- – Accessibility to transit and transit shelters
- – Traffic calming measures and street trees
- – Parks and public spaces

Other strategies (development density, diversity, design, transit accessibility, traffic calming) are intended to account for the effects of many of the measures in the above list. Therefore, the assumed effectiveness of the Pedestrian Network measure should utilize the lower end of the 1 - 10% reduction range. If the pedestrian improvements are being combined with a significant number of the companion strategies, trip reductions for those strategies should be applied as well, based on the values given specifically for those strategies in other sections of this report. Based upon these findings, and drawing upon recommendations presented in the alternate literature below, the recommended VMT reduction attributable to pedestrian network improvements, above and beyond the benefits of other measures in the above bullet list, should be 1% for comprehensive pedestrian accommodations within the development plan or project itself, or 2% for comprehensive internal accommodations and external accommodations connecting to off-site destinations.

Alternative Literature:

Alternate:

- Walking is three times more common with enhanced pedestrian infrastructure
- 58% increase in non-auto mode share for work trips

The Nelson\Nygaard [1] report for the City of Santa Monica Land Use and Circulation Element EIR summarized studies looking at pedestrian environments. These studies have found a direct connection between non-auto forms of travel and a high quality pedestrian environment. Walking is three times more common with communities that have pedestrian friendly streets compared to less pedestrian friendly communities. Non-auto mode share for work trips is 49% in a pedestrian friendly community, compared to 31% in an auto-oriented community. Non-auto mode share for non-work trips is 15%, compared to 4% in an auto-oriented community. However, these effects also depend upon other aspects of the pedestrian friendliness being present, which are accounted for separately in this report through land use strategy mitigation measures such as density and urban design.

Alternate:

- 0.5% - 2.0% reduction in VMT

The Sacramento Metropolitan Air Quality Management District (SMAQMD) Recommended Guidance for Land Use Emission Reductions [2] attributes 1% reduction for a project connecting to *existing* external streets and pedestrian facilities. A 0.5% reduction is attributed to connecting to *planned* external streets and pedestrian facilities (which must be included in a pedestrian master plan or equivalent). Minimizing pedestrian barriers attribute an additional 1% reduction in VMT. These recommendations are generally in line with the recommended discounts derived from the preferred literature above.

Preferred and Alternative Literature Notes:

[1] Nelson\Nygaard, 2010. City of Santa Monica Land Use and Circulation Element EIR Report, Appendix – Santa Monica Luce Trip Reduction Impacts Analysis (p.401). http://www.shapethefuture2025.net/

Nelson\Nygaard looked at the following studies: Anne Vernez Moudon, Paul Hess, Mary Catherine Snyder and Kiril Stanilov (2003), Effects of Site Design on Pedestrian Travel in Mixed Use, Medium-Density Environments, http://www.wsdot.wa.gov/research/reports/fullreports/432.1.pdf; Robert Cervero and Carolyn Radisch (1995), Travel Choices in Pedestrian Versus Automobile Oriented Neighborhoods, http://www.uctc.net/papers/281.pdf;

[2] Sacramento Metropolitan Air Quality Management District (SMAQMD) Recommended Guidance for Land Use Emission Reductions. (p. 11) http://www.airquality.org/ceqa/GuidanceLUEmissionReductions.pdf

Other Literature Reviewed:

None

3.2.3 Implement a Neighborhood Electric Vehicle (NEV) Network

Range of Effectiveness: 0.5-12.7% vehicle miles traveled (VMT) reduction since Neighborhood Electric Vehicles (NEVs) would result in a mode shift and therefore reduce the traditional vehicle VMT and GHG emissions[47]. Range depends on the available NEV network and support facilities, NEV ownership levels, and the degree of shift from traditional

Measure Description:

The project will create local "light" vehicle networks, such as NEV networks. NEVs are classified in the California Vehicle Code as a "low speed vehicle". They are electric powered and must conform to applicable federal automobile safety standards. NEVs offer an alternative to traditional vehicle trips and can legally be used on roadways with speed limits of 35 MPH or less (unless specifically restricted). They are ideal for short trips up to 30 miles in length. To create an NEV network, the project will implement the necessary infrastructure, including NEV parking, charging facilities, striping, signage, and educational tools. NEV routes will be implemented throughout the project and will double as bicycle routes.

Measure Applicability:

- Urban, suburban, and rural context
- Small citywide or large multi-use developments
- Appropriate for mixed-use projects

Baseline Method:

See introduction to transportation section for a discussion of how to estimate trip rates and VMT. The CO_2 emissions are calculated from VMT as follows:

$$CO_2 = VMT \times EF_{running}$$

Where:

VMT = vehicle miles traveled

$EF_{running}$ = emission factor for running emissions

[47] Transit vehicles may also result in increases in emissions that are associated with electricity production or fuel use. The Project Applicant should consider these potential additional emissions when estimating mitigation for these measures.

Inputs:

The following information needs to be provided by the Project Applicant:

- low vs. high penetration

Mitigation Method:

% VMT reduction = Pop * Number * NEV

Where

Penetration	=	Number of NEVs per household (0.04 to 1.0 from [1])
NEV	=	VMT reduction rate per household (12.7% from [2])

Assumptions:

Data based upon the following reference:

[1] City of Lincoln, MHM Engineers & Surveyors, *Neighborhood Electric Vehicle Transportation Program Final Report*, Issued 04/05/05

[2] City of Lincoln, *A Report to the California Legislature as required by Assembly Bill 2353, Neighborhood Electric Vehicle Transportation Plan Evaluation,* January 1, 2008.

Emission Reduction Ranges and Variables:

Pollutant	Category Emissions Reductions[48]
CO_2e	0.5 – 12.7% of running
PM	0.5 – 12.7% of running
CO	0.5 – 12.7%of running
NOx	0.5 – 12.7% of running
SO_2	0.5 – 12.7% of running
ROG	0.3 – 7.6% of total

Discussion:

The estimated number of NEVs per household may vary based on what the project estimates as a penetration rate for implementing an NEV network. Adjust according to project characteristics. The estimated reduction in VMT is for non-NEV miles traveled. The calculations below assume that NEV miles traveled replace regular vehicle travel.

[48] The percentage reduction reflects emission reductions from running emissions. The actual value will be less than this when starting and evaporative emissions are factored into the analysis. ROG emissions have been adjusted to reflect a ratio of 40% evaporative and 60% exhaust emissions based on a statewide EMFAC run of all vehicles.

This may not be the case and the project should consider applying an appropriate discount rate on what percentage of VMT is actually replaced by NEV travel..

Example:

Sample calculations are provided below:

- Low Range % VMT Reduction (low penetration) = 0.04 * 12.7% = 0.5%
- High Range % VMT Reduction (high penetration) = 1.0 * 12.7% = 12.7%

Preferred Literature:

- 12.7% reduction in VMT per household
- Penetration rates: 0.04 to 1 NEV / household

The NEV Transportation Program plans to implement the following strategies: charging facilities, striping, signage, parking, education on NEV safety, and NEV/bicycle lines throughout the community. . One estimate of current NEV ownership reported roughly 600 NEVs in the city of Lincoln in 2008[49]. With current estimated households of ~13,500[50], a low estimate of NEV penetration would be 0.04 NEV per household. A high NEV penetration can be estimated at 1 NEV per household. The 2007 survey of NEV users in Lincoln revealed an average use of about 3,500 miles per year [2]. With an estimated annual 27,500 VMT/household[51], this results in a 12.7% reduction in VMT per household.

Alternative Literature:

- 0.5% VMT reduction for neighborhoods with internal NEV connections
- 1% VMT reduction for internal and external connections to surrounding neighborhoods
- 1.5% VMT reduction for internal NEV connections and connections to other existing NEV networks serving all other types of uses.

The Sacramento Metropolitan Air Quality Management District (SMAQMD) Recommended Guidance for Land Use Emission Reductions notes that current studies show NEVs do not replace gas-fueled vehicles as the primary vehicle. For the purpose

---

[49] Lincoln, California: A NEV-Friendly Community, Bennett Engineering, the City of Lincoln, and LincolnNEV, August 28, 2008 - http://electrickmotorsports.com/news.php

[50] SACOG Housing Estimates Statistics (http://www.sacog.org/about/advocacy/pdf/fact-sheets/HousingStats.pdf). Linearly interpolated 2008 household numbers between 2005 and 2035 projections.

[51] SACOG SACSim forecasts for VMT per household at 75.4 daily VMT per household * 365 days = 27521 annual VMT per household

of providing incentives for developers to promote NEV use, a project will receive the above listed VMT reductions for implementation.

Alternative Literature Reference:

[1] Sacramento Metropolitan Air Quality Management District (SMAQMD) Recommended Guidance for Land Use Emission Reductions. (p. 21) http://www.airquality.org/ceqa/GuidanceLUEmissionReductions.pdf

Other Literature Reviewed:

None

3.2.8 Provide Electric Vehicle Parking

Range of Effectiveness: Grouped strategy. [See SDT-3]

Measure Description:

This project will implement accessible electric vehicle parking. The project will provide conductive/inductive electric vehicle charging stations and signage prohibiting parking for non-electric vehicles. Refer to Neighborhood Electric Vehicle Network (SDT-3) strategy for effectiveness ranges in this category. The benefits of Electric Vehicle Parking may be quantified when grouped with the use of electric vehicles and or Neighborhood Electric Vehicle Network.

Measure Applicability:

- Urban or suburban contexts
- Appropriate for residential, retail, office, mixed use, and industrial projects

Alternative Literature:

No literature was identified that specifically looks at the quantitative impact of implementing electric vehicle parking.

Alternative Literature References:

None

Other Literature Reviewed:

None

3.2.9 Dedicate Land for Bike Trails

Range of Effectiveness: Grouped strategy. [See LUT-9]

Measure Description:

Larger projects may be required to provide for, contribute to, or dedicate land for the provision of off-site bicycle trails linking the project to designated bicycle commuting routes in accordance with an adopted citywide or countywide bikeway plan.

Refer to Improve Design of Development (LUT-9**)** strategy for ranges of effectiveness in this category. The benefits of Land Dedication for Bike Trails have not been quantified and should be grouped with the Improve Design of Development strategy to strengthen street network characteristics and improve connectivity to off-site bicycle networks.

Measure Applicability:

- Urban, suburban, or rural contexts
- Appropriate for large residential, retail, office, mixed use, and industrial projects

Alternative Literature:

No literature was identified that specifically looks at the quantitative impact of implementing land dedication for bike trails.

Alternative Literature References:

None

Other Literature Reviewed:

None

3.4.3 Provide Ride-Sharing Programs

Range of Effectiveness: 1 – 15% commute vehicle miles traveled (VMT) reduction and therefore 1 - 15% reduction in commute trip GHG emissions.

Measure Description:

Increasing the vehicle occupancy by ride sharing will result in fewer cars driving the same trip, and thus a decrease in VMT. The project will include a ride-sharing program as well as a permanent transportation management association membership and funding requirement. Funding may be provided by Community Facilities, District, or County Service Area, or other non-revocable funding mechanism. The project will promote ride-sharing programs through a multi-faceted approach such as:

- Designating a certain percentage of parking spaces for ride sharing vehicles
- Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
- Providing a web site or message board for coordinating rides

Measure Applicability:

- Urban and suburban context
- Negligible impact in many rural contexts, but can be effective when a large employer in a rural area draws from a workforce in an urban or suburban area, such as when a major employer moves from an urban location to a rural location.
- Appropriate for residential, retail, office, industrial, and mixed-use projects

Baseline Method:

See introduction to transportation section for a discussion of how to estimate trip rates and VMT. The CO_2 emissions are calculated from VMT as follows:

$$CO_2 = VMT \times EF_{running}$$

Where:

VMT = vehicle miles traveled

$EF_{running}$ = emission factor for running emissions

Inputs:

The following information needs to be provided by the Project Applicant:

- Percentage of employees eligible

- Location of project site: low density suburb, suburban center, or urban location

Mitigation Method:

% VMT Reduction = Commute * Employee

Where

Commute = % reduction in commute VMT (from [1])
Employee = % employees eligible

Detail:

- Commute: 5% (low density suburb), 10% (suburban center), 15% (urban) annual reduction in commute VMT (from [1])

Assumptions:

Data based upon the following references:

[1] VTPI. *TDM Encyclopedia*. http://www.vtpi.org/tdm/tdm34.htm; Accessed 3/5/2010.

Emission Reduction Ranges and Variables:

Pollutant	Category Emissions Reductions[58]
CO_2e	1 – 15% of running
PM	1 – 15% of running
CO	1 – 15% of running
NOx	1 – 15% of running
SO_2	1 – 15% of running
ROG	0.6 – 9% of total

Discussion:

This strategy is often part of Commute Trip Reduction (CTR) Program, another strategy documented separately (see TRT-1 and TRT-2). The Project Applicant should take care not to double count the impacts.

Example:

Sample calculations are provided below:

[58] The percentage reduction reflects emission reductions from running emissions. The actual value will be less than this when starting and evaporative emissions are factored into the analysis. ROG emissions have been adjusted to reflect a ratio of 40% evaporative and 60% exhaust emissions based on a statewide EMFAC run of all vehicles.

- Low Range % VMT Reduction (low density suburb and 20% eligible) = 5% * 20% = 1%
- High Range % VMT Reduction (urban and 100% eligible) = 15% * 1 = 15%

Preferred Literature:

- 5 – 15% reduction of commute VMT

The *Transportation Demand Management (TDM) Encyclopedia* notes that because rideshare passengers tend to have relatively long commutes, mileage reductions can be relatively large with rideshare. If ridesharing reduces 5% of commute trips it may reduce 10% of vehicle miles because the trips that are reduced are twice as long as average. Rideshare programs can reduce up to 8.3% of commute VMT, up to 3.6% of total regional VMT, and up to 1.8% of regional vehicle trips (Apogee, 1994; TDM Resource Center, 1996). Another study notes that ridesharing programs typically attract 5-15% of commute trips if they offer only information and encouragement, and 10-30% if they also offer financial incentives such as parking cash out or vanpool subsidies (York and Fabricatore, 2001).

Alternative Literature:

- Up to 1% reduction in VMT (if combined with two other strategies)

Per the Nelson\Nygaard report [2], ride-sharing would fall under the category of a minor TDM program strategy. The report allows a 1% reduction in VMT for projects with at least three minor strategies.

Alternative Literature References:

[2] Nelson\Nygaard, 2005. *Crediting Low-Traffic Developments* (p.12). http://www.montgomeryplanning.org/transportation/documents/TripGenerationAnalysisUsingURBEMIS.pdf

Criteron Planner/Engineers and Fehr & Peers Associates (2001). Index 4D Method. *A Quick-Response Method of Estimating Travel Impacts from Land-Use Changes*. Technical Memorandum prepared for US EPA, October 2001.

Other Literature Reviewed:

None

3.4.4 Implement Subsidized or Discounted Transit Program

Range of Effectiveness: 0.3 – 20.0% commute vehicle miles traveled (VMT) reduction and therefore a 0.3 – 20.0% reduction in commute trip GHG emissions.

Measure Description:

This project will provide subsidized/discounted daily or monthly public transit passes. The project may also provide free transfers between all shuttles and transit to participants. These passes can be partially or wholly subsidized by the employer, school, or development. Many entities use revenue from parking to offset the cost of such a project.

Measure Applicability:

- Urban and suburban context
- Negligible in a rural context
- Appropriate for residential, retail, office, industrial, and mixed-use projects

Baseline Method:

See introduction to transportation section for a discussion of how to estimate trip rates and VMT. The CO_2 emissions are calculated from VMT as follows:

$$CO_2 = VMT \times EF_{running}$$

Where:

VMT = vehicle miles traveled

$EF_{running}$ = emission factor for running emissions

Inputs:

The following information needs to be provided by the Project Applicant:

- Percentage of project employees eligible
- Transit subsidy amount
- Location of project site: low density suburb, suburban center, or urban location

Mitigation Method:

$$\% \text{ VMT Reduction} = A * B * C$$

Where

A = % reduction in commute vehicle trips (VT) (from [1])

B = % employees eligible

C = Adjustment from commute VT to commute VMT

Detail:

- A:

	Daily Transit Subsidy			
	$0.75	$1.49	$2.98	$5.96
Worksite Setting	**% Reduction in Commute VT**			
Low density suburb	**1.5%**	**3.3%**	**7.9%**	**20.0%***
Suburban center	**3.4%**	**7.3%**	**16.4%**	**20.0%***
Urban location	**6.2%**	**12.9%**	**20.0%***	**20.0%***
* Discounts greater than 20% will be capped, as they exceed levels recommended by TCRP 95 Draft Chapter 19 and other literature.				

- C: 1.0 (see Appendix C for detail)

Assumptions:

Data based upon the following references:

[1] Nelson\Nygaard, 2010. *City of Santa Monica Land Use and Circulation Element EIR Report, Appendix – Santa Monica Luce Trip Reduction Impacts Analysis* (p.401).

[2] Nelson\Nygaard used the following literature sources: VTPI, Todd Litman, *Transportation Elasticities, http://www.vtpi.org/elasticities.pdf.* Comsis Corporation (1993), *Implementing Effective Travel Demand Management Measures: Inventory of Measures and Synthesis of Experience*, USDOT and Institute of Transportation Engineers (www.ite.org); www.bts.gov/ntl/DOCS/474.html.

Emission Reduction Ranges and Variables:

Pollutant	Category Emissions Reductions[59]
CO_2e	0.3 - 20% of running
PM	0.3 - 20% of running
CO	0.3 - 20% of running
NOx	0.3 - 20% of running
SO_2	0.3 - 20% of running
ROG	0. 18 - 12% of total

[59] The percentage reduction reflects emission reductions from running emissions. The actual value will be less than this when starting and evaporative emissions are factored into the analysis. ROG emissions have been adjusted to reflect a ratio of 40% evaporative and 60% exhaust emissions based on a statewide EMFAC run of all vehicles.

Discussion:

This strategy is often part of a Commute Trip Reduction (CTR), another strategy documented separately (see TRT-1 and TRT-2). The Project Applicant should take care not to double count the impacts.

The literature evaluates this strategy in relation to the employer, but keep in mind that this strategy can also be implemented by a school or the development as a whole.

Example:

Sample calculations are provided below:

- Low Range % VMT Reduction ($0.75, low density suburb, 20% eligible) = 1.5% * 20% = 0.3%
- High Range % VMT Reduction ($5.96, urban, 100% eligible) = 20% * 100% = 20%

Preferred Literature:

Commute Vehicle Trip Reduction	**Daily Transit Subsidy**			
Worksite Setting	**$0.75**	**$1.49**	**$2.98**	**$5.96**
Low density suburb, rideshare oriented	0.1%	0.2%	0.6%	1.9%
Low density suburb, mode neutral	1.5%	3.3%	7.9%	21.7%*
Low density suburb, transit oriented	2.0%	4.2%	9.9%	23.2%*
Activity center, rideshare oriented	1.1%	2.4%	5.8%	16.5%
Activity center, mode neutral	3.4%	7.3%	16.4%	38.7%*
Activity center, transit oriented	5.2%	10.9%	23.5%*	49.7%*
Regional CBD/Corridor, rideshare oriented	2.2%	4.7%	10.9%	28.3%*
Regional CBD/Corridor, mode neutral	6.2%	12.9%	26.9%*	54.3%*
Regional CBD/Corridor, transit oriented	9.1%	18.1%	35.5%*	64.0%*

* Discounts greater than 20% will be capped, as they exceed levels recommended by *TCRP 95 Draft Chapter 19* and other literature.

Nelson\Nygaard (2010) updated a commute trip reduction table from VTPI Transportation Elasticities to account for inflation since the data was compiled. Data regarding commute vehicle trip reductions was originally from a study conducted by Comsis Corporation and the Institute of Transportation Engineers (ITE).

Alternative Literature:

Alternate:

- 2.4-30.4% commute vehicle trip reduction (VTR)

TCRP 95 Draft Chapter 19 [2] indicates transit subsidies in areas with good transit and restricted parking have a commute VTR of 30.4%; good transit but free parking, a commute VTR of 7.6%; free parking and limited transit 2.4%. Programs with transit subsidies have an average commute VTR of 20.6% compared with an average commute VTR of 13.1% for sites with non-transit fare subsidies.

Alternate:

- 0.03-0.12% annual greenhouse gas (GHG) reduction

Moving Cooler [3] assumed price elasticities of -0.15, -0.2, and -0.3 for lower fares 25%, 33%, and 50%, respectively. *Moving Cooler* assumes average vehicle occupancy of 1.43 and a VMT/trip of 5.12.

Alternative Literature References:

[2] Pratt, Dick. Personal Communication Regarding the Draft of TCRP 95 Traveler Response to Transportation System Changes – Chapter 19 Employer and Institutional TDM Strategies.

[3] Cambridge Systematics. *Moving Cooler: An Analysis of Transportation Strategies for Reducing Greenhouse Gas Emissions.* Technical Appendices. Prepared for the Urban Land Institute. (Table D.3) http://www.movingcooler.info/Library/Documents/Moving%20Cooler_Appendix%20B_Effectiveness_102209.pdf

Other Literature Reviewed:

None

3.4.7 Implement Commute Trip Reduction Marketing

Range of Effectiveness: 0.8 – 4.0% commute vehicle miles traveled (VMT) reduction and therefore 0.8 – 4.0% reduction in commute trip GHG emissions.

Measure Description:

The project will implement marketing strategies to reduce commute trips. Information sharing and marketing are important components to successful commute trip reduction strategies. Implementing commute trip reduction strategies without a complementary marketing strategy will result in lower VMT reductions. Marketing strategies may include:

- New employee orientation of trip reduction and alternative mode options
- Event promotions
- Publications

CTR marketing is often part of a CTR program, voluntary or mandatory. CTR marketing is discussed separately here to emphasis the importance of not only providing employees with the options and monetary incentives to use alternative forms of transportation, but to clearly and deliberately promote and educate employees of the various options. This will greatly improve the impact of the implemented trip reduction strategies.

Measure Applicability:

- Urban and suburban context
- Negligible in a rural context
- Appropriate for residential, retail, office, industrial and mixed-use projects

Baseline Method:

See introduction to transportation section for a discussion of how to estimate trip rates and VMT. The CO_2 emissions are calculated from VMT as follows:

$$CO_2 = VMT \times EF_{running}$$

Where:

VMT = vehicle miles traveled
$EF_{running}$ = emission factor for running emissions

Inputs:

The following information needs to be provided by the Project Applicant:

- Percentage of project employees eligible (i.e. percentage of employers choosing to participate)

Mitigation Method:

% Commute VMT Reduction = A * B * C

Where

A = % reduction in commute vehicle trips (from [1])

B = % employees eligible

C = Adjustment from commute VT to commute VMT

Detail:

- A: 4% (per [1])
- C: 1.0 (see Appendix C for detail)

Assumptions:

Data based upon the following references:

[1] Pratt, Dick. Personal communication regarding the *Draft of TCRP 95 Traveler Response to Transportation System Changes – Chapter 19 Employer and Institutional TDM Strategies.* Transit Cooperative Research Program.

Emission Reduction Ranges and Variables:

Pollutant	Category Emissions Reductions[61]
CO_2e	0.8 – 4.0% of running
PM	0.8 – 4.0% of running
CO	0.8 – 4.0% of running
NOx	0.8 – 4.0% of running
SO_2	0.8 – 4.0% of running
ROG	0.5 – 2.4% of total

[61] The percentage reduction reflects emission reductions from running emissions. The actual value will be less than this when starting and evaporative emissions are factored into the analysis. ROG emissions have been adjusted to reflect a ratio of 40% evaporative and 60% exhaust emissions based on a statewide EMFAC run of all vehicles.

Discussion:

The effectiveness of commute trip reduction marketing in reducing VMT depends on which commute reduction strategies are being promoted. The effectiveness levels provided below should only be applied if other programs are offered concurrently, and represent the total effectiveness of the full suite of measures.

This strategy is often part of a CTR Program, another strategy documented separately (see strategy T# E1). Take care not to double count the impacts.

Example:

Sample calculations are provided below:

- Low Range % VMT Reduction (20% eligible) = 4% * 20% = 0.8%
- High Range % VMT Reduction (100% eligible) = 4% * 100% = 4.0%

Preferred Literature:

- 4-5% commute vehicle trips reduced with full-scale employer support

TCRP 95 Draft Chapter 19 notes the average empirically-based estimate of reductions in vehicle trips for full-scale, site-specific employer support programs alone is 4-5%. This effectiveness assumes there are alternative commute modes available which have on-going employer support. For a program to receive credit for such outreach and marketing efforts, it should contain guarantees that the program will be maintained permanently, with promotional events delivered regularly and with routine performance monitoring.

Alternative Literature:

- 5-15% reduction in commute vehicle trips
- 3% increase in effectiveness of marketed transportation demand management (TDM) strategies

VTPI [2] notes that providing information on alternative travel modes by employers was one of the most important factors contributing to mode shifting. One study (Shadoff,1993) estimates that marketing increases the effectiveness of other TDM strategies by up to 3%. Given adequate resources, marketing programs may reduce vehicle trips by 5-15%. The 5 – 15% range comes from a variety of case studies across the world. U.S. specific case studies include: 9% reduction in vehicle trips with TravelSmart in Portland (12% reduction in VMT), 4-8% reduction in vehicle trips from four cities with individualized marketing pilot projects from the Federal Transit Administration (FTA). Averaged across the four pilot projects, there was a 6.75% reduction in VMT.

Alternative Literature References:

[2] VTPI, TDM Encyclopedia – TDM Marketing; http://www.vtpi.org/tdm/tdm23.htm; accessed 3/5/2010. Table 7 (citing FTA, 2006)

Other Literature Reviewed:

None

3.4.10 Implement a School Pool Program

Range of Effectiveness: 7.2 – 15.8% school vehicle miles traveled (VMT) Reduction and therefore 7.2 – 15.8% reduction in school trip GHG emissions.

Measure Description:

This project will create a ridesharing program for school children. Most school districts provide bussing services to public schools only. SchoolPool helps match parents to transport students to private schools, or to schools where students cannot walk or bike but do not meet the requirements for bussing.

Measure Applicability:

- Urban, suburban, and rural context
- Appropriate for residential and mixed-use projects

Baseline Method:

See introduction to transportation section for a discussion of how to estimate trip rates and VMT. The CO_2 emissions are calculated from VMT as follows:

$$CO_2 = VMT \times EF_{running}$$

Where:

VMT = vehicle miles traveled

$EF_{running}$ = emission factor for running emissions

Inputs:

The following information needs to be provided by the Project Applicant:

- Degree of implementation of SchoolPool Program(moderate to aggressive)

Mitigation Method:

$$\% \text{ VMT Reduction} = \text{Families} * B$$

Where

Families = % families that participate (from [1] and [2])

B = adjustments to convert from participation to daily VMT to annual school VMT

Detail:

- Families: 16% (moderate implementation), 35% (aggressive implementation), (from [1] and [2])
- B: 45% (see Appendix C for detail)

Assumptions:

Data based upon the following references:

[1] Transportation Demand Management Institute of the Association for Commuter Transportation. *TDM Case Studies and Commuter Testimonials*. Prepared for the US EPA. 1997. (p. 10, 36-38) http://www.epa.gov/OMS/stateresources/rellinks/docs/tdmcases.pdf

[2] Denver Regional Council of Governments (DRCOG). *Survey of Schoolpool Participants, April 2008.* http://www.drcog.org/index.cfm?page=SchoolPool. Obtained from Schoolpool Coordinator, Mia Bemelen.

Emission Reduction Ranges and Variables:

Pollutant	Category Emissions Reductions[64]
CO_2e	7.2 – 15.8% of running
PM	7.2 – 15.8% of running
CO	7.2 – 15.8% of running
NOx	7.2 – 15.8% of running
SO_2	7.2 – 15.8% of running
ROG	4.3 – 9.5% of total

Discussion:

This strategy reflects the findings from only one case study.

Example:

Sample calculations are provided below:

- Low Range % School VMT Reduction (moderate implementation) = 16% * 45% = 7.2%
- High Range % School VMT Reduction (aggressive implementation) = 35% * 45% = 15.8%

[64] The percentage reduction reflects emission reductions from running emissions. The actual value will be less than this when starting and evaporative emissions are factored into the analysis. ROG emissions have been adjusted to reflect a ratio of 40% evaporative and 60% exhaust emissions based on a statewide EMFAC run of all vehicles.

Preferred Literature:

- 7,711 – 18,659 daily VMT reduction

As presented in the TDM Case Studies [1] compilation, the SchoolPool program in Denver saved 18,659 VMT per day in 1995, compared with 7,711 daily in 1994 – a 142% increase. The Denver Regional Council of Governments (DRCOG) [2] enrolled approximately 7,000 families and 32 private schools in the program. The DRCOG staff surveyed a school or interested families to collect home location and schedules of the students. The survey also identified prospective drivers. DRCOG then used carpool-matching software and GIS to match families. These match lists were sent to the parents for them to form their own school pools. 16% of families in the database formed carpools. The average carpool carried 3.1 students.

The SchoolPool program is still in effect and surveys are conducted every few years to monitor the effectiveness of the program. The latest survey report received was in 2008. The report showed that the participant database had increased to over 10,000 families, an 18% increase from 2005. 29% of participants used the list to form a school carpool. This percentage was lower than 35% in 2005 but higher than prior to 2005, at 24%. The average number of families in each carpool ranged from 2.1 prior to 2005 to 2.8 in 2008. The average number of carpool days per week was roughly 4.7. The number of school weeks per year was 39. Per discussions with the Schoolpool Coordinator, a main factor of success was establishing a large database. This was achieved by having parents opt-out of the database versus opting-in.

Alternative Literature:

None

Alternative Literature References:

None

Other Literature Reviewed:

None

3.4.11 Provide Employer-Sponsored Vanpool/Shuttle

Range of Effectiveness: 0.3 – 13.4% commute vehicle miles traveled (VMT) reduction and therefore 0.3 – 13.4% reduction in commute trip GHG emissions.

Measure Description:

This project will implement an employer-sponsored vanpool or shuttle. A vanpool will usually service employees' commute to work while a shuttle will service nearby transit stations and surrounding commercial centers. Employer-sponsored vanpool programs entail an employer purchasing or leasing vans for employee use, and often subsidizing the cost of at least program administration, if not more. The driver usually receives personal use of the van, often for a mileage fee. Scheduling is within the employer's purview, and rider charges are normally set on the basis of vehicle and operating cost.

Measure Applicability:

- Urban, suburban, and rural context
- Appropriate for office, industrial, and mixed-use projects

Baseline Method:

See introduction to transportation section for a discussion of how to estimate trip rates and VMT. The CO_2 emissions are calculated from VMT as follows:

$$CO_2 = VMT \times EF_{running}$$

Where:

VMT = vehicle miles traveled
$EF_{running}$ = emission factor for running emissions

Inputs:

The following information needs to be provided by the Project Applicant:

- Percentage of employees eligible

Mitigation Method:

$$\%\ VMT\ Reduction = A * B * C$$

Where
A = % shift in vanpool mode share of commute trips (from [1])
B = % employees eligible
C = adjustments from vanpool mode share to commute VMT

Detail:

- A: 2-20% annual reduction in vehicle mode share (*from [1]*)
  - Low range: low degree of implementation, smaller employers
  - High range: high degree of implementation, larger employers
- C: 0.67 (See Appendix C for detail)

Assumptions:

Data based upon the following references:

[1] TCRP Report 95. *Chapter 5: Vanpools and Buspools - Traveler Response to Transportation System Changes.* http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_95c5.pdf. (p.5-8)

Emission Reduction Ranges and Variables:

Pollutant	Category Emissions Reductions[65]
CO_2e	0.3 – 13.4% of running
PM	0.3 – 13.4% of running
CO	0.3 – 13.4% of running
NOx	0.3 – 13.4% of running
SO_2	0.3 – 13.4% of running
ROG	0.18 – 8.0% of total

Discussion:

Vanpools are generally more successful with the largest of employers, as large employee counts create the best opportunities for employees to find a suitable number of travel companions to form a vanpool. In the San Francisco Bay Area several large companies (such as Google, Apple, and Genentech) provide regional bus transportation for their employees. No specific studies of these large buspools were identified in the literature. However, the GenenBus serves as a key element of the overall commute trip reduction (CTR) program for Genentech, as discussed in the CTR Program – Required strategy.

This strategy is often part of a CTR Program, another strategy documented separately (see strategy T# E1). Take care not to double count the impacts.

Example:

Sample calculations are provided below:

[65] The percentage reduction reflects emission reductions from running emissions. The actual value will be less than this when starting and evaporative emissions are factored into the analysis. ROG emissions have been adjusted to reflect a ratio of 40% evaporative and 60% exhaust emissions based on a statewide EMFAC run of all vehicles.

- Low Range % VMT Reduction (low implementation/small employer, 20% eligible) = 2% * 20% * 0.67 = 0.3%
- High Range % VMT Reduction (high implementation/large employer, 100% eligible) = 20% * 100% * 0.67 = 13.4%

Preferred Literature:

- 2-20% vanpool mode share

TCRP Report 95 [1] notes that vanpools can capture 2 to 20% mode share. This range can be attributed to differences in programs, access to high-occupancy vehicle (HOV) lanes, and geographic range. The *TCRP Report* highlights a case study of the 3M Corporation, which with the implementation of a vanpooling program saw drive alone mode share decrease by 10 percentage points and vanpooling mode share increase to 7.8 percent. The *TCRP Report* notes most vanpools programs do best where one-way trip lengths exceed 20 miles, where work schedules are fixed and regular, where employer size is sufficient to allow matching of 5 to 12 people from the same residential area, where public transit is inadequate, and were some congestion or parking problems exist.

Alternative Literature:

In *TDM Case Studies* [2], a case study of Kaiser Permanente Hospital has shown their employer-sponsored shuttle service eliminated 380,100 miles per month, or nearly 4 million miles of travel per year, and four tons of smog precursors annually.

Alternative Literature References:

[2] Transportation Demand Management Institute of the Association for Commuter Transportation. *TDM Case Studies and Commuter Testimonials*. Prepared for the US EPA. 1997. http://www.epa.gov/OMS/stateresources/rellinks/docs/tdmcases.pdf

Other Literature Reviewed:

None