CITY OF WILDOMAR – CITY COUNCIL
Agenda Item #2.4
PUBLIC HEARING
Meeting Date: June 10, 2020

TO: Mayor and Council Members

FROM: Matthew Bassi, Planning Director
Mark Teague, AICP, Assistant Planning Director

SUBJECT: Vehicle Miles Travelled (VMT) CEQA Threshold Policy Guidelines: City Council action to establish VMT Threshold Policy Guidelines for evaluating vehicular traffic impacts as part of the City's CEQA review process

STAFF REPORT

RECOMMENDATION:

The Planning Department recommends the City Council adopt a Resolution entitled:

RESOLUTION NO. 2020-____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF WILDOMAR, CALIFORNIA, APPROVING AN AMENDMENT TO THE WILDOMAR LOCAL CEQA GUIDELINES TO ADOPT "VEHICLE MILES TRAVELED" (VMT) THRESHOLDS OF SIGNIFICANCE FOR PURPOSES OF ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) GUIDELINES IN ACCORDANCE WITH SB 743

BACKGROUND:

In 2018, Senate Bill (SB) 743 changed how transportation impacts are considered during determination of project compliance with the California Environmental Quality Act (CEQA) by changing the criteria for determination from using vehicle Level of Service (LOS) thresholds to using Vehicle Miles Traveled (VMT) thresholds. Historically, vehicle delay and road congestion were the only metrics used when evaluating a project's transportation impact. The new metric is intended to reduce greenhouse gas emissions and improve air quality by reducing the length of trips. By eliminating LOS as a CEQA threshold that would trigger the need for additional mitigation, SB 743 made roadways, intersections, and the congestion management a public policy issue rather than an environmental issue. Certainly, they overlap, but this change gives the City greater flexibility when considering development projects.

To implement the legislation, the City will need to determine the methodology used for calculating VMT, adopt a new CEQA threshold, and identify feasible mitigation measures for projects that exceed the new threshold. These actions by the city need to be supported by substantial evidence in the record. Although each City must adopt their own threshold, the Western Riverside Council of Governments (WRCOG) has provided several studies and guidance to help the City in this regard. The recommendations provided in this Staff Report are taken from the WRCOG guidance and have been adjusted by Staff to meet the needs of the City. The SB 743 requires the switch from LOS to VMT be completed by the City by July 1, 2020.

Summary:

Staff is recommending that the City adopt the Southern California Association of Governments (SCAG) Regional Transportation Plan / Sustainable Communities Strategy future year VMT projects by jurisdiction or subregion thresholds. This would align future projects with the General Plan and keep the VMT calculations current as described in this staff report. Staff's recommendation is that the City endeavor to ensure that new projects be able to demonstrate a 3% (percent) reduction in VMT that currently exists.

Planning Commission Review:

The Planning Commission reviewed the VMT policy thresholds at its June 3, 2020 meeting. After discussion of the technical specifics of this new requirement, the Commission voted 5-0 to adopt PC Resolution No. 2020-16 recommending City Council approval.

DISCUSSION / ANALYSIS:

Since SB 743 is a departure from current practice of analyzing Level of Service (LOS) traffic impacts, we need to address the following below prior to taking any action:

1. **Screening:** Which projects should be exempt from the VMT analysis?

2. **Methodology**: What methodology should be used to forecast projected-generated VMT and the project's effect on VMT under baseline and cumulative conditions, and how does the selection of a threshold influence the methodology decision?

3. **Thresholds:** What VMT threshold should be adopted by the City?

4. **Mitigation**: What are examples of feasible mitigation measures for a VMT impact given the rural context of the WRCOG region?

Screening:

When a project is being considered, the first task will be to see if it should be 'screened' out of needing to conduct a VMT analysis. A list of projects that would ordinarily be screened out is shown in the draft resolution included as Attachment A this staff report. The list is based on the Office of Planning and Research *Technical Advisory on Evaluating Transportation Impacts in CEQA* and should be considered preliminary with an expectation that the City will amend it over time. Types of projects on the list include

projects exempt from CEQA, trails and bicycle lanes, increases in residential density, and local-serving uses.

Generally projects that require a General Plan Amendment or are of sufficient size to require an environmental impact report, would need to conduct a project-specific analysis of VMT using the City's adopted methodology. Not all larger projects would automatically result in greater VMT however, so each project will be reviewed, and a determination made. This process is similar to how we currently review projects for traffic impact analyses. Generally though, a project of any appreciable size would have other environmental issues that would trigger a more rigorous environmental analysis and adding the VMT discussion would be minor.

Methodology:

Base Year (2012) total VMT per service population (i.e., population plus employment), home-based VMT per capita, and home-based work VMT per worker were calculated using outputs from the Southern California Association of Governments' (SCAG) Regional Transportation Plan travel forecasting model and the Riverside County Transportation Analysis Model (RIVTAM). In addition, data from the California Household Travel Survey was used to compare model derived estimates of home-based VMT with those based on survey observations. VMT results and comparisons of results from different data sources were displayed graphically to aid in determining the appropriate VMT metric and data source for calculating VMT for use in the WRCOG subregion.

Based on the different options analyzed, Staff recommends that the City use the Riverside County Travel Demand Model (RIVTAM) and the VMT per service population data as noted in the WRCOG Analysis. Jurisdictions and technical experts have been using RIVTAM since 2009, so there is a familiarity with the model. Furthermore, a new version of the Riverside County Travel Demand Model is being developed by WRCOG and will be ready for use by Fall 2020. The new version of RIVTAM will be updated and refined to improve compliance with SB 743 expectations (i.e., full external trip lengths), and the City's General Plan. This update will also revise the VMT provided in the WRCOG online Screening Tool developed by Fehr and Peers. (https://gis.fehrandpeers.com/WRCOGVMT/)

The capabilities of travel forecasting models were reviewed by WRCOG to determine their strengths and weaknesses in generating appropriate VMT analysis and determining the effectiveness of mitigation strategies. (Fehr & Peers, 2019) Based on this review, staff recommends that the RIVTAM model be used by projects subject to VMT analysis. Local traffic firms are familiar with the RIVTAM model, and its countywide model results can be compared to other studies in the region ensuring consistency of review.

Thresholds:

For the CEQA analysis to be meaningful, there must be a threshold against which project changes are evaluated. The Office of Planning and Research ("OPR") recommends a 15 percent reduction based on the 2010 CAPCOA report. (California Office of Planning and Research, 2018) Fehr & Peers examined the OPR recommendation and concluded that a rural-suburban area such as Wildomar would struggle to achieve this level of reduction.

Many of the VMT reduction strategies assume an urban and transit rich environment. Fehr and Peers analysis resulted in the measures summarized in Table 1. As shown in the Table, the types of measures that could be implemented in Wildomar result in an average of approximately 2 to 7 percent reduction in VMT using the 2010 CAPCOA estimate, and 1 to 5 percent reduction in VMT with more current data. While the OPR 15 percent VMT reduction may be aspirational, adopting this level in Wildomar would result in the need to adopt a statement of overriding considerations with an EIR.

Even with the VMT reductions evaluated by WRCOG, some of the measures are unlikely to be applied in Wildomar. Reductions from mixed use projects assume a larger project than we typically see. In addition, the City is unable to add or change transit routes easily, and the low population makes the potential for VMT reduction from this measure unlikely. If these two reduction measures are removed from consideration, the WRCOG low and high percentages are 1.77% and 3.00% (percent) respectively. Table 1 includes telecommuting and ridesharing measures that are effective at reducing VMT, but dependent on the type of business. As we've seen during the COVID-19 crisis our local businesses are remarkably adaptable, however some businesses require customers to visit the building. Ridesharing, van pools, carpooling, and similar methods of including more riders in vehicles are also very effective but rely heavily on employer incentives. Both measures could be part of a program for those projects that require VMT analysis but were not included in the average reduction potential supporting because of their reliance on the tenant.

Table 1: Estimated VMT Reduction for Wildomar With Plausible Mitigation

Measure	CAPCOA		WRCOG	
Estimated VMT Reduction	**Low**	**High**	**Low**	**High**
Mixed Use[1]	9.00%	30.00%	-	12.00%
Pedestrian Network[2]	-	2.00%	5.00%	5.70%
Traffic Calming	0.25%	1.00%	-	1.70%
Car Sharing	0.40%	0.70%	0.30%	1.60%
Transit System	0.02%	2.50%	0.30%	6.30%
Total	9.67%	36.20%	5.60%	27.30%
Average	1.93%	7.24%	1.12%	5.46%
Tenant Dependent Measures				
Telecommuting	0.70%	5.50%	0.20%	4.50%
Ridesharing	1.00%	15.00%	2.50%	8.30%
Total	*1.70%*	*20.50%*	*2.70%*	*12.80%*
Average	*0.85%*	*10.25%*	*1.35%*	*6.40%*
Overall Total	11.37%	56.70%	8.30%	40.10%
Overall Average	1.62%	8.10%	1.19%	5.73%

[1] *Large Project Dependent*
[2] *Assumes Connectivity*

Source: (Fehr & Peers, 2019)

WRCOG evaluated potential VMT thresholds within the context of the objectives of SB 743, legal opinions related to the legislation, proposed CEQA Guidelines updates, and the Technical Advisory produced by the Governor's Office of Planning and Research (OPR).

Four threshold options have been developed by WRCOG for consideration by member agencies. Staff's recommendation and rationale follows each of the options.

1. Thresholds consistent with OPR's Technical Advisory, recommending that proposed developments generate VMT per person that is 15% below existing VMT per capita.

   Unsuitable. The analysis provided by WRCOG and Fehr & Peers shows that a rural community like Wildomar without a well-developed transportation system is unlikely to achieve anywhere near a 15% reduction in VMT regardless of project-specific mitigation. If this threshold is selected, more projects would need to prepare EIR's so that a statement of overriding consideration could be adopted. This would substantially increase the cost and time associated with larger development projects.

2. Thresholds consistent with Lead Agency air quality, greenhouse gas emissions reduction, and energy conservation goals;

   Unsuitable. While the City took part in the preparation of the regional Climate Action Plan (CAP) it has not been adopted and the CAP is likely inadequate to provide support for the mitigation measures. The City has not adopted its own goals for air quality and energy conservation, relying instead on the California Building Code Title 24, guidance from the South Coast Air Quality Management District, and the CEQA process. Should the City develop a CAP or community goals later, this option could be considered.

3. Thresholds consistent with the Regional Transportation Plan / Sustainable Communities Strategy future year VMT projects by jurisdiction or subregion; and

   Recommended. The portions of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that affect Wildomar is based on the land use element of our General Plan. As such, using this option assumes that projects consistent with the General Plan are also consistent with the RTP/SCS and should not require additional analysis for VMT. Projects that require amendment to the General Plan that would trigger an EIR would need to complete a VMT analysis using the methodology described above. Other amendments to the General Plan would need to be evaluated on a case-by-case basis. Rather than the 15-percent reduction in VMT recommended in the OPR guidance, staff is recommending that future projects demonstrate that they will reduce existing VMT by at least 3 percent. Projects that cannot demonstrate a 3 percent reduction in VMT will be required to conduct additional analysis and add mitigation as appropriate. If project design or operational features cannot reduce VMT below the threshold then an EIR may be required in order for the City to consider a statement of overriding considerations.

4. Thresholds based on baseline VMT performance by jurisdiction or subregion.

   Unsuitable. The City could adopt its own baseline VMT performance threshold after conducting our own study and then independently maintain that threshold. Currently the City doesn't have the resources or necessary data to ensure compatibility with the regional modelling. In addition, the threshold would need nearly constant maintenance as conditions in the City and region change. While a certain amount of maintenance is needed for any methodology, using the regional approach in #3 ensures that the City is consistent with others in the region, and that the model is regularly updated.

Based on the research conducted by WRCOG, which is included by reference in this report, it is recommended that the City use threshold #3 as described above, however, with the 3% reduction standard instead of 15% since 3% is more reasonable for Wildomar. Projects that are at or below the jurisdiction's current average VMT per service population per household, or below the subregion's average VMT be considered less than significant.

Mitigation:

Unlike urban areas that have many transit options, rural communities like Wildomar are limited in the mitigation that can apply to reduce VMT. For example, without high quality transit in the City it is impractical to eliminate parking.[1] Lack of high-quality transit also reduces the potential for transit-oriented design (TOD). Certainly, the City can take credit for mixed use development, however even this will be a smaller rural-scale than can occur in urban areas. The City's mixed-use ordinance supports a 30 – 50 percent ratio of residential to commercial.[2]

WRCOG evaluated several mitigation strategies designed to reduce VMT for applicability in the City. Transportation planners refer to a reduction in trips as Transportation Demand Management (TDM). The Transportation Demand Management (TDM) strategies and its effectiveness for reducing VMT were reviewed and assessed for relevancy. (Fehr & Peers, 2019) Given the City's rural / suburban land use context, the following key strategies were identified as the most appropriate.

- diversifying land use
- improving pedestrian networks
- implementing traffic calming infrastructure
- building low-street bicycle network improvements
- encouraging telecommuting and alternative work schedules
- providing ride-share programs

[1] Section 21064.3(b) of the Public Resource Code defines high-quality transit areas as: 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. Riverside Transit Authority stops 8 and 23 do not meet this definition with stops averaging over 30 minutes between stops.

[2] Chapter 17.305 of the Wildomar Municipal Code.

Due to limitations of project-by-project approaches to reducing VMT, an evaluation of larger mitigation programs was conducted by WRCOG. The evaluation considered existing programs such as the WRCOG Transportation Uniform Mitigation Fee (TUMF) Program and new mitigation program concepts. While the TUMF Program funds a variety of projects including those that would contribute to VMT reduction, the overall effect of the Program results in an increase in VMT due to substantial roadway capacity expansion.

The TUMF could be modified to separate the VMT reducing projects into a separate impact fee program based on a VMT reduction nexus, but it could not be relied upon for VMT mitigation in its current form. New program concepts included VMT mitigation banks and exchanges. These are innovative concepts that have not yet been developed and tested but are being considered in areas where limited mitigation options would otherwise exist. WRCOG is undertaking a study to look into the feasibility of a VMT mitigation bank or exchange that would further assist lead agencies in implementing SB 743.

In the long term the City will update the General Plan to include VMT reducing concepts in the land use and mobility elements. One method would be to create an urban core where connectivity between land uses, access to transit, and mixed-use development known to reduce VMT can take the pressure to develop off of the parts of the City that wish to remain rural. This core can then be linked to local and regional transit completing the concept. Once included in the land use design of the General Plan, the need for individual VMT analysis would be replaced with a simple consistency finding. For now however, the City will need to consider each project.

Updated Traffic Impact Analysis Guidelines

Even with the shift from LOS to VMT, the City may require transportation impact analyses (TIA) for some projects during the development review and CEQA process. The threshold of when to prepare a TIA is 50-PM Peak Hour Trips, with the format of the TIA based on the Riverside County TIA Guidelines and the scope of the analysis approved by staff. The Riverside County TIA Guidelines are proposed to be amended to incorporate the VMT analysis, and staff recommends that the City continue to rely on the amended guidelines. Local Traffic Engineers are familiar with the TIA Guidelines, and the resulting documents can easily be compared to others in the region to evaluate cumulative impacts.

CEQA Determination:

The CEQA Guidelines Section 15064.7. states:

> *"Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence. Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2)."*

Nothing in the CEQA Guidelines states that adopting thresholds is subject to environmental review. This is further supported by the *California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369* court decision. Initially, the litigation concerned whether BAAQMD's adoption of these thresholds was a "project" subject to CEQA review. The trial court found that it was and issued a writ of mandate invalidating the thresholds for failure to comply with CEQA. The First District Court of Appeal reversed, finding that the thresholds were not subject to CEQA review for two reasons. First, the CEQA Guidelines establish the required procedure for enacting generally applicable thresholds of significance, and prior CEQA review is not part of that process. Second, the thresholds were not a "project" because the "environmental change" alleged by California Building Industry Association (CBIA) was speculative and not reasonably foreseeable. The Supreme Court did not grant review of the Court of Appeal's holding that the act of adopting thresholds is not a project under CEQA (Id. at 369, fn. 6); therefore, the Court of Appeal's holding on this issue stands. Based on the court decision, the City's public meeting before the Planning Commission and City Council, along with this staff report and incorporated documents, meets the requirements of CEQA Section 15064(b)(2).

FISCAL IMPACTS

None

Respectfully Submitted,
Gary Nordquist
City Manager

Reviewed By,
Thomas D. Jex
City Attorney

ATTACHMENTS:

A. Council Resolution No. 2020-____
   Exhibit 1 - VMT Screened Projects

References:

- California Office of Planning and Research. (2018). *Technical Advisory on Evaluation Transportation Impacts in CEQA.*
- CAPCOA. (2010). *Quantifying Greenhouse Gas Mitigation Measures.*
- Fehr & Peers. (2019). *SB 743 Implementation TDM Strategy Assessment.*
- Western Riverside Council of Governments. (2019). *WRCOG SB 743 Implementation Pathway: Documentation Package.*
- Western Riverside County Council of Governments. (2012). *Regional Transportation/Sustainable Communities Plan.*

ATTACHMENT A

Council Resolution No. 2020-____

RESOLUTION NO. 2020-____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF WILDOMAR, CALIFORNIA, APPROVING AN AMENDMENT TO THE WILDOMAR LOCAL CEQA GUIDELINES TO ADOPT "VEHICLE MILES TRAVELED" (VMT) THRESHOLDS OF SIGNIFICANCE FOR PURPOSES OF ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) GUIDELINES IN ACCORDANCE WITH SB 743

WHEREAS, the California Environmental Quality Act Guidelines ("CEQA Guidelines") encourage public agencies to develop and publish generally applicable "thresholds of significance" to be used in determining the significance of a project's environmental effects; and

WHEREAS, CEQA Guidelines section 15064.7(a) defines a threshold of significance as "an identifiable quantitative, qualitative or performance level of a particular environmental effect, noncompliance 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"; and

WHEREAS, CEQA Guidelines section 15064.7(b) requires that thresholds of significance must be adopted by ordinance, resolution, rule, or regulations, developed through a public review process, and be supported by substantial evidence; and

WHEREAS, pursuant to CEQA Guidelines section 15064.7(c), when adopting thresholds of significance, a public agency may consider thresholds of significance adopted or recommended by other public agencies provided that the decision of the agency is supported by substantial evidence; and

WHEREAS, Senate Bill 743, enacted in 2013 and codified in Public Resources Code section 21099, required changes to the CEQA Guidelines regarding the criteria for determining the significance of transportation impacts of projects; and

WHEREAS, in 2018, the Governor's Office of Planning and Research ("OPR") proposed, and the California Natural Resources Agency certified and adopted, new CEQA Guidelines section 15064.3 that identifies vehicle miles traveled ("VMT") – meaning the amount and distance of automobile travel attributable to a project – as the most appropriate metric to evaluate a project's transportation impacts; and

WHEREAS, as a result, automobile delay, as measured by "level of service" and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA; and

WHEREAS, CEQA Guidelines section 15064.3 goes into effect on July 1, 2020, though public agencies may elect to be governed by this section immediately; and

WHEREAS, the City of Wildomar, following a public review process consisting of staff presentations before the Planning Commission wishes to adopt the VMT thresholds of significance for determining the significance of transportation impacts that are recommended in an analysis conducted by the Western Riverside Council of Governments on behalf of its member jurisdictions.

WHEREAS, the Planning Commission held a public meeting on June 3, 2020 to review the proposed VMT Thresholds of Significance, at which time interested persons had an opportunity to testify in support of, or opposition to, the adoption VMT Thresholds of Significance, and at which time the Planning Commission received public testimony concerning said VMT Thresholds of Significance; and

WHEREAS, in accordance with Chapter 17.04.050 of the Wildomar Municipal Code, the Planning Department on May 29, 2020 published a legal notice in the Press Enterprise, a local newspaper of general circulation, notifying the general public of the June 10, 2020 City Council meeting where the Council would consider and discuss the adoption of VMT Thresholds of Significance; and

WHEREAS, in accordance with Wildomar Municipal Code, the City Council conducted a public hearing on June 10, 2020, at which time interested persons had an opportunity to testify in support of, or opposition to, the adoption VMT Thresholds of Significance, and at which time the City Council received public testimony concerning said VMT Thresholds of Significance.

THE CITY COUNCIL OF THE CITY OF WILDOMAR HEREBY DOES ORDAIN AS FOLLOWS:

SECTION 1. CEQA FINDINGS:

The CEQA Guidelines Section 15064.7. states that *"each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence. Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2)."*

Nothing in the CEQA Guidelines states that adopting thresholds is subject to environmental review. This is further supported by the *California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369* court decision. Initially, the litigation concerned whether BAAQMD's adoption of these thresholds was a "project" subject to CEQA review. The trial court found that it was and issued a writ of mandate invalidating the thresholds for failure to comply with CEQA. The First District Court of Appeal reversed, finding that the thresholds were not subject to CEQA review for two reasons. First, the CEQA Guidelines establish the required procedure for enacting generally applicable thresholds of significance, and prior CEQA review is not part of that process. Second, the thresholds were not a "project" because

the “environmental change” alleged by California Building Industry Association (CBIA) was speculative and not reasonably foreseeable. The Supreme Court did not grant review of the Court of Appeal’s holding that the act of adopting thresholds is not a project under CEQA (Id. at 369, fn. 6); therefore, the Court of Appeal’s holding on this issue stands.

SECTION 2. CITY COUNCIL ACTION

Pursuant to the Wildomar Municipal Code, and in light of the record before it, including the staff report dated June 10, 2020 and all evidence and testimony heard at the public hearing, the City Council based on the analysis above hereby adopts this Resolution adopting the following VMT Policy Thresholds:

1. Utilize the Riverside County Travel Demand Model (RIVTAM/RIVCOM) as the City’s methodology to measure VMT as part of the CEQA review process;

2. Utilize the Riverside County Travel Demand Model (RIVTAM/RIVCOM) as its method to analyze a project’s VMT impacts as part of the CEQA review process

3. Establish a threshold standard of 3% (percent) below existing VMT as calculated by WRCOG for new development projects as part of the CEQA review process.

4. Adopt the list of “VMT Screened Project” types that are considered to reduce VMT as outlined in Exhibit 1 attached hereto this Resolution to be used as part of the CEQA review process.

5. Update the City’s Transportation Impact Analysis “scope of work” guidelines to reflect the policy change from “Level of Service” (LOS) to “Vehicle Miles Travelled” (VMT) to be used as part of the CEQA review process.

PASSED, APPROVED AND ADOPTED this 10th day of June, 2020.

_____
Dustin Nigg
Mayor

APPROVED AS TO FORM:

_____
Thomas D. Jex
City Attorney

ATTEST:

_____
Janet Morales
Acting City Clerk

EXHIBIT 1

VMT Screened Projects

VMT Screened Projects

Each project will be evaluated to determine if it can be screened from needing a separate vehicle mile travelled (VMT) analysis. The determination will be made during the Pre-Application Review (PAR), or during consultation with the Planning Department prior to making application. Note that these screening determinations are not absolute, and the City may determine that a project specific VMT analysis must be prepared to support the project. As this is a new procedure and CEQA threshold, the City will revisit this process periodically to ensure compliance with state law and court decisions.

The following projects are considered to have a de minimis effect on VMT and the City may determine that a project specific VMT Analysis is unnecessary:

Development projects:

- Any project that generates or attracts 110 or fewer trips per day. This generally corresponds to the following "typical" development potentials:
  - 11 single family housing units
  - 16 multi-family, condominiums, or townhouse housing units
  - 10,000 sq. ft. of office
  - 15,000 sq. ft. of light industrial
  - 63,000 sq. ft. of warehousing
  - 79,000 sq. ft. of high cube transload and short-term storage warehouse
- Projects statutorily or categorically exempt from CEQA.
- Locally serving retail 50,000 square feet or less.
- Mixed use projects with at least 30 percent residential.

Transportation projects:

The City often makes mobility system improvements independent of, or concurrent with, development projects. The following improvements are not considered to increase VMT and would therefore not be required to complete a VMT analysis.

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets and that do not add additional motor vehicle capacity.
- Roadside safety devices or hardware installation such as median barriers and guardrails
- 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 used 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
- ☐ 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
- ☐ Development in a transit priority area