



DATE: March 30, 2021

TO: Members of the VMT Technical Advisory Committee (TAC)

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SUBJECT: Technical Advisory Committee Discussion of Petaluma's Transition to Vehicle-Miles Traveled and Recommendation on the Draft VMT Implementation Guidelines (Senate Bill 743)

RECOMMENDATION

It is recommended that the Technical Advisory Committee (TAC) consider the Draft SB 743 VMT Implementation Guidelines for the City of Petaluma prepared by Fehr & Peers (Attachment 1) and provide input to further shape the Implementation Guidelines prior to being considered by Planning Commission and City Council.

In particular it is requested that the VMT TAC provide recommendations for consideration by the Planning Commission and City Council on the following:

- Thresholds (Does the TAC find OPR's recommended 15% reduction in VMT per capita an appropriate threshold for Petaluma?)
- Screening (What types of projects do not need VMT analysis?)
- Mitigation (What options should be considered to mitigate significant VMT impacts?)

BACKGROUND

In 2013, Senate Bill (SB) 743 established new legislation mandating a major change to the CEQA guidelines (Section 15064.3); replacing the LOS metric with a vehicle-miles traveled (VMT) metric. The shift from LOS to VMT focuses on regional traffic patterns and reducing greenhouse gas (GHG) emissions, rather than vehicle delays on local roadway networks.

In 2019 the City of Petaluma retained Fehr & Peers to provide transportation planning services in support of the City of Petaluma SB 743 Implementation. Subsequently, the City of Petaluma appointed the VMT Technical Advisory Committee to work with staff and the traffic consultant to develop Local VMT Implementation Guidelines for consideration by the Planning Commission and ultimate adoption by the City Council to bring the City into compliance with SB 743. More

specifically, the VMT Implementation Guidelines and the requirements of SB 743 are to address how the City analyzes transportation impacts under the California Environmental Quality Act (CEQA) for discretionary projects (development review projects and municipal project). The VMT Implementation Guidelines are to apply exclusively to VMT generated by new development and is only one step of many possible ways that the City may wish to address a more comprehensive VMT strategy. The Guidelines are not intended to address VMT generated by existing uses throughout the City.

In creating and recommending the VMT Implementation Guidelines the task of the Committee is to make recommendations regarding VMT metrics, VMT calculation methods, VMT-based CEQA thresholds, screening criteria, and general mitigation strategy direction (i.e., project-specific, or areawide/programmatic), to guide the evaluation of transportation related environmental impacts for new projects in accordance with SB 743.

As discussed later in this report, given the continuing evolution of the VMT discussion, the recent adoption of the 2030 carbon neutrality goal, and to ensure the City is looking more comprehensively at VMT reduction consistent with these items, the Committee may also wish to provide input on near term VMT reduction and mitigation strategies and frameworks (e.g., TDM ordinance, near term VMT reduction programs, VMT TIF program) that could be explored by staff following adoption of the SB 743 Implementation Guidelines and in advance of the General Plan Update.

The City of Petaluma's VMT TAC has met twice (on June 18, 2020 and on July 30, 2020) to provide input on the City's transition from a level of service (LOS) metric to vehicle miles traveled (VMT) metric. Staff reports for the previous two VMT TAC meetings provide information on primary considerations to inform the development of Petaluma specific VMT implementation guidelines for the purpose of evaluation VMT impacts under the California Environmental Quality Act (CEQA) in accordance with SB 743.

The focus of the Committee's discussion at the first VMT TAC meeting was metrics and methodology. In particular the Committee considered what model the City of Petaluma should use, what metrics should be analyzed, and how VMT should be calculated. There was consensus that methodology should rely upon on the Sonoma County Transportation Authority's (SCTA) regional model for VMT assessments. The TAC concurred that the SCTA model was most suitable for use because it provides best available trip data, is routinely maintained, and allows for future opportunities to take advantage of regional VMT reduction programs. The TAC members also generally concurred on the metric to be used opting to focus on home-based trips as opposed to commuter-based trips for residential uses. The home-based metric was preferred in part due to the desire to capture a majority of local trips such as to schools, shopping, and services in the City and region. The discussion noted that the LOS metric measures impacts to vehicle operators related to inconvenience and delay, whereas the VMT metric measures impacts to the environment due to driving.

The second VMT TAC meeting focused on the key decision points related to thresholds, screening, and mitigation options. VMT TAC members were generally split between establishing a VMT threshold consistent with OPR's recommendation at 15% and establishing a more aggressive

threshold such as 16.8% or greater, which is the threshold recommended by the California Air Resources Control Board (CARB). There was generally agreement on the Committee regarding projects that would screen out from a VMT analysis (15 dwelling units or less, small retail projects of 30,000 square feet or less, projects located within low-VMT areas, and projects within ½ mile of major transit stop, such as SMART stations, or along a high-quality transit corridor¹) and criteria that would exclude screening out of projects that would otherwise be screened out as consistent with the above list (projects involving a drive through, projects that exceed adopted parking standards, and projects that City staff believe are inappropriate for screening). The Committee's discussion around VMT mitigation explored various options on the project, citywide and regional scale. There was consensus that every project should be incorporating VMT reduction strategies into the project design and contributing towards making Petaluma less car dependent.

At the prior two meetings VMT TAC members expressed a desire to ensure that VMT implementation aligned with the City's Climate Emergency Resolution and furthered the City's objective to work towards net zero emissions as soon as possible. The discussion included consideration around the City's housing opportunity sites, implications regarding the development review process for projects located in areas with higher per capita VMT rates, and where future growth might best be accommodated within the City to achieve the intent of SB 743. As further discussed below, the City Council has since adopted the Climate Emergency Framework, further advancing the City's commitment to addressing the climate crisis.

The upcoming third meeting provides the VMT TAC an opportunity to review and provide feedback on the City's Draft SB 743 VMT Implementation Guidelines prior to being considered by the Planning Commission and City Council. Input received from the VMT TAC will be forwarded to the Planning Commission and Council for consideration prior to adoption of the Guidelines.

DISCUSSION

The Draft SB 743 VMT Implementation Guidelines (Attachment 1) is the culmination of input received from the VMT TAC, comprised of City staff, decision makers, committee members, as well as outside agency representatives from the SCTA, Sonoma County, and Caltrans, guidance from transportation consultants Fehr & Peers, and informed by publications from the California Office of Planning and Research (OPR), the California Air Pollution Control Officers Association (CAPCOA), Sonoma County Transportation Authority (SCTA), and jurisdictions that have established VMT programs such as the City of San Jose.

In Sonoma County only a few other jurisdictions have established VMT thresholds (e.g., the City of Santa Rosa and the City of Cotati). Both of which have opted to align with OPR

¹ Per the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* and Public Resources Code Chapter 21064.3, a major transit stop is defined as a transit stop containing an existing rail transit station, a ferry terminal served by either 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. Public Resources Code Chapter 21155 defines a high-quality transit corridor as a corridor with fixed-route bus service with service intervals no longer than 15 minutes during peak commute hours.

recommendations and have set the VMT threshold at 15 percent below the countywide/citywide per capita baseline average.

While the Petaluma specific VMT Guidelines are being development, the City of Petaluma has used the recommended screening methodology and thresholds set forth in Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (dated December 2018 and available on the City's VMT webpage at: <https://cityofpetaluma.org/vmt/>) to evaluate VMT impacts for discretionary projects as part of required environmental review. The adoption of the local VMT Implementation Guidelines will establish the framework under which discretionary projects are reviewed and evaluated to assess VMT impacts in accordance with CEQA.

By way of the VMT TAC meetings, VMT workshops and the City's VMT webpage, the City of Petaluma has gone through a public process to receive input on VMT implementation. The Draft SB 743 VMT Implementation Guidelines is the result of that effort and contains the necessary information to bring the City into compliance with SB 743.

The discussion below summarizes the Draft VMT Guidelines (Attachment 1) in terms of format and key metrics, methodology, and thresholds. The Draft Guidelines are presented to the Committee for review and formal recommendation to Planning Commission and ultimately City Council for adoption.

The Draft VMT Guidelines document is organized into six sections as outlined below:

Executive Summary: Summarizes the contents of the Implementation report.

Section 1. Introduction: Identifies the impetus to SB 743 and the intent of replacing the LOS metric with the VMT metric.

Section 2. Background: Introduces SB 743 policies, the adoption process, and an overview of on how VMT are assessed.

Section 3. Implementation Recommendations: Provides Petaluma specific recommendations on key elements of a VMT program.

Section 4. TDM Strategy Research: Outlines research regarding transportation demand management (TDM), effectiveness in reducing VMT, and implementing strategies for VMT.

Section 5. Considerations for Updating Recommendations. Provides a statement that recommendations contained in the Draft SB 743 Implementation Guidelines are influenced by a number of factors and subject to change.

Appendices A-D contain substantial evidence that inform recommendations and support the City in VMT implementation.

More specifically, the draft guidelines include the following recommendations in keeping with input from the Committee and prepared for formal adoption by the City Council.

Metrics: Based on information reviewed by the TAC and input received, the Guidelines include the following VMT metrics:

- **Residential projects:** total home-based VMT per resident
- **Office and other employment-focused projects:** total home-based work VMT per employee
- **Retail and other commercial service projects:** total project effect on VMT within a geographic area

Methods: The SCTA model is identified as the preferred model for use by the City and to assess project based VMT.

Thresholds: As mentioned under the background discussion above, at prior meetings TAC members generally fell into two groups regarding VMT thresholds for residential and office projects, those in support of OPR recommended threshold at 15% below the citywide baseline average and those in support of a more stringent threshold greater than 15%. The June 18, 2020 VMT TAC Staff Report provides further discussion on consideration involved with setting the VMT Thresholds of Significance, which are used to determine transportation related environmental impacts in CEQA analyses. Because the direction of the TAC was split when discussed at previous meetings, staff is asking that the Committee further consider the VMT threshold options to reach consensus on a recommendation regarding VMT thresholds for consideration by decision makers.

- **For residential projects:** Project total home-based VMT per resident exceeds % of the City-wide average.
- **For office and other employment-focused projects:** Project total home-based work VMT per employee exceeds % of the nine-county Bay Area regional average²
- **For retail and other commercial service projects:** Project results in a net increase in VMT over the geographic area that the project influences.
- **For mixed-use and other projects:** Project components should be analyzed using the relevant thresholds for residential, office/employment-focus, or retail/commercial service projects. The benefit of a mix of uses on-site can and should be included in the analysis.

² It is noted that the nine-county Bay Area regional average total home-based work VMT per employee should be calculated by using data published by the Metropolitan Transportation Commission, including data developed from the MTC travel demand model. Because the SCTA travel demand model estimates VMT beyond the county boundary by use of Big Data (which accounts for trips to Marin, Napa, San Francisco, etc.), the effective geography of the SCTA model is similar to that of the MTC travel demand model.

- **For transportation projects:** Project results in induced travel and an increase in City-wide VMT.
- **For redevelopment projects:** Project results in increased VMT versus current land uses. City staff retain discretion to identify the baseline VMT for use in the calculation (i.e., based on current uses or permitted uses).

Mitigation: Projects that exceed VMT thresholds require mitigation to reduce the number of vehicle trips and/or the length of trips to meet the established VMT threshold. Mitigation can be incorporated at the project level and/or community wide. Project level mitigation measures may include increased density, introduction of a mix of land uses, inclusion of affordable units, minimizing parking, encouraging telecommuting, installing bike, pedestrian, and transit improvements, and offering alternative options such as e-bikes, e-van pools, and transit passes. At the community level, mitigation measures may include expanding bike and pedestrian infrastructure, providing traffic calming and low-stress bicycle networks, paid parking programs, increasing transit service frequency and convenience, establishing/expanding car share programs, and limiting urban sprawl (such as through an urban growth boundary, which the City has already established). In general, community level strategies provide greater VMT reduction than project level strategies because they are applicable to a larger population (citywide, as opposed to an individual project). Community level strategies require funding through a combination of development impact fees, local tax dollars, and regional and state grant programs.

VMT mitigation can also be program based, such as transportation demand management (TDM) programs, which are coordinated strategies that change travel behavior and can be applied on a project-by-project basis and as part of a citywide TDM program. Other program based VMT mitigation could include impact fees, mitigation exchanges, or mitigation banks.

For development review projects, VMT reduction is considered on a project-by-project basis. In the near-term this approach is expected to continue until such time as a citywide or regional TDM program is established. In the mid-term, the forthcoming General Plan Update project provides an opportunity to assess VMT citywide and develop a comprehensive TDM program balancing all land uses within the city to achieve targeted VMT reductions. In the long-term it is expected that VMT mitigation will continue to evolve as opportunities for county and regional partnerships, perhaps through the SCTA, become available. It is also important to note that VMT mitigation for CEQA Transportation analysis is largely untested in the legal system, and thus any VMT mitigation program must carefully consider legal risks and be accompanied by a legally defensible CEQA analysis.

Implementation of SB 743 results in the adoption of VMT-based CEQA Transportation section analysis metrics, methods, and thresholds of significance that are used to evaluate environmental impacts on the transportation system. Adoption of these items will allow the City's CEQA analysis process to be in alignment with the CEQA Guidelines sections that were modified in response to SB 743. Until such time that the VMT-based metrics, methods, and thresholds are formally adopted, consideration of specific project-level or citywide/programmatic mitigation measures by the TAC is premature given the uncertain level of mitigation required (i.e., until a threshold is adopted, the general level of mitigation that may be required is unknown). However, the TAC could make a general recommendation as part of the SB 743 implementation process to encourage

the City to consider programmatic or citywide mitigation strategies once the VMT-based metrics, methods, and thresholds are adopted by the City Council.

TAC members expressed an interest in seeing all projects minimize VMT through design and/or contribution to a city or regional VMT reduction program. Members noted that all new projects should maximum VMT reduction to further advance the City's objective of achieving carbon neutrality. It is recommended that the TAC further consider mitigation options and recommend either mitigation of project impacts on a project-by-project basis or that the City develop a programmatic, Citywide mitigation strategy after VMT-based thresholds have been adopted.

The TAC may provide guidance on whether to include project-level and/or community-level strategies, whether to develop a near-term framework for funding VMT reduction projects, whether to wait for the General Plan Update, and/or whether to adopt ordinances relating to TDM and parking changes. It is important to note that all of these are discretionary actions that requires CEQA review and are best pursued as subsequent steps after adoption of the City's the SB 743 Implementation Guidelines.

The TAC may consider forwarding a recommendation on to Planning Commission and Council recommending that following adoption of the SB 743 Implementation Guidelines, staff pursue Programmatic Mitigation Strategies that take into consideration the climate and demonstrate a commitment to sustainability with consideration of the General Plan Update and the Climate Action and Adaptation Plan.

Draft VMT Transportation Impact Analysis Guidelines (Exhibit B to Attachment 1)

Projects subject to CEQA that do not screen out from a VMT Assessment will be required to prepare a VMT Transportation Impact Analysis (VMT TIA). To ensure consistency in approach, the City's Draft SB 743 VMT Implementation Guidelines includes guidance for the preparation of a VMT Transportation Impact Analysis (Exhibit B). The intended audience for the VMT TIA Guidelines is transportation engineers, project applicants, and City staff. The purpose is to standardize requirements, reporting, and resulting recommendations for VMT studies and is intended to be complementary to future ordinances relating to TDM requirements and VMT based mitigation or TIF programs.

Depending on the nature of the project, location, and other factors, a VMT Analysis may be limited in scope, due to screening thresholds, or may require a full assessment that evaluates VMT, discloses VMT impacts, and identifies mitigation measures. The VMT Analysis informs the necessary level of CEQA review and provides substantial evidence to support a CEQA determination regarding environmental impacts to transportation and circulation. The process of determining the level of VMT analysis needed is outlined in the VMT TIA Guidelines, Appendix A, which contains a process flowchart to follow based on a project's characteristics (project size, land use type, project features, location, etc.).

As the Draft VMT TIA Guidelines are utilized, staff may identify inefficiencies or challenges in implementing the guidelines and administrative updates may be made at the discretion of the City Engineer. The City's traffic engineer will have the discretion to authorize and accept refinements to clarify the VMT TIA Guidelines. Any future changes to the VMT thresholds or significance

criteria will be at the sole discretion of the City Council and informed by State mandates and CEQA case law.

In addition to VMT, Appendix G of the California Environmental Quality Act (CEQA) Guidelines requires that jurisdictions assess whether a project would conflict with a program, plan, ordinance, or policy addressing the circulation system, substantially increase hazards due to a geometric design features or incompatible uses or result in inadequate emergency access. The City traffic engineer is currently reviewing the City's approach to assessing these CEQA topics and non-CEQA/General Plan consistency topics (e.g., level of service) through the City's traffic study review process, as described in the LOS Traffic Impact Studies Guidelines section below. In addition to SB 743, other recent changes to state guidance on TIA's, such as Caltrans' *Interim Local Development and Intergovernmental Review (LDIGR) Safety Review Practitioners Guidance* (December 2020)³, and an increased public interest in roadway safety, provide the City an opportunity to rethink the City's approach to other transportation impact topics beyond VMT. More information on the opportunities related to roadway safety are presented below in the Roadway Multi-Modal Safety section.

Conclusions

As discussed above, the substantive considerations before the VMT TAC include input and recommendations regarding the Draft SB 743 Implementation Guidelines and specifically what threshold should be used to assess transportation related environmental impacts, what types of projects do and do not screen out from requiring a VMT analysis, and what mitigation options should be pursued.

The Draft SB 743 VMT Implementation Guidelines will be further augmented as input is received from the third VMT TAC meeting, and forthcoming Planning Commission and City Council hearings. The City's SB 743 VMT Implementation Guidelines will be used to guide transportation review for new development and municipal projects. The forthcoming General Plan Update, Climate Action and Adaptation Plan, and associated environmental analysis provides a mechanism to evaluate VMT on a citywide scale, establish citywide and regional VMT reduction strategies, and adopt comprehensive VMT policies in line with the City's goal of achieving carbon neutrality by 2030. It is anticipated that a primary objective of the General Plan update will be to realize transportation emissions by reducing VMT through expansion of active transportation routes, land use policies and program, permitting increased density near existing and planned transit and within priority development areas (consistent with the Bay Area Association of Governments and Metropolitan Transportation Commission's Sustainable Community Strategy), increased public transit investment, and developing infrastructure for non-combustion vehicles.

As part of the General Plan Update, it is expected that the Draft SB 743 VMT Implementation Guidelines may be refined, augmented, or otherwise revised. As more data on VMT is collected

³ The *Traffic Safety Bulletin 20-02-rl: Interim Local Development and Intergovernmental Review (LDIGR) Safety Review Practitioners Guidance* (December 18, 2020) document can be viewed here: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

and local, regional, state, and national climate policies evolve, updates to the Guidelines will be warranted. The SB 743 VMT Implementation Guidelines is intended to be a living document to be updated and refined periodically. Establishing a standard process and thresholds to guide environmental review through adoption of the City's SB 743 Implementation Guidelines, will bring the City into compliance with state law regarding VMT regulation.

Other Considerations

As described above, the VMT TAC is charged with reviewing the Draft SB 743 VMT Implementation Guidelines and related documents and providing input and feedback to further shape the Guidelines prior to consideration by decision makers. The primary focus of the TAC should be on the adequacy of the Draft SB 743 VMT Implementation Guidelines in establishing a framework under which discretionary projects are reviewed and evaluated in accordance with CEQA.

The following items address topics related to VMT that may warrant continued consideration to further inform the evolving approach to transportation VMT impact analysis. The VMT TAC is invited to consider these additional items and provide input as appropriate and is reminded that the current task is specific to bringing the City into compliance with SB 743 by advancing recommendations regarding the City of Petaluma's Draft SB 743 VMT Implementation Guidelines (Attachment 1).

Climate Emergency and Resiliency/Climate Emergency Framework

On May 6, 2019, the City of Petaluma adopted a Climate Emergency Resolution. The Resolution elevates climate issues to the highest priority, makes a commitment to achieving carbon neutrality as quickly as possible and no later than 2045, and establishes a climate commission to guide policy direction on climate action. A Climate Action Commission was appointed to help craft policies for recommendations to the City Council, coordinate workshops with experts on climate change, encourage community involvement, and identify best practices to address climate change that can be applied in Petaluma.

On December 10, 2020, the City's Climate Action Commission forwarded a unanimous recommendation to the City Council for adoption of the Climate Emergency Framework . On January 11, 2021, at a joint meeting of the City Council and the Climate Action Commission the City Council adopted the Climate Emergency Framework. The Framework guides the City's ongoing response to and discussion about the climate crisis and establishes 2030 as the City's goal for achieving carbon neutrality. Along with the Climate Emergency Framework, the Climate Action Commission identified 15 potential priority climate actions for the City Council's future consideration. Priority Action No. 5 states: "Adopt a VMT policy that is consistent with the 2030 carbon neutrality goal. In order to meet these targets, prepare policy recommendations for rapidly implementing alternative clean, safe, accessible, and affordable and active and public transportation modes to meet the rising community need for climate-friendly transportation." While this recommended action has not specifically been adopted by the City Council it provides guidance from which to frame the TAC's discussion about the VMT Implementation Guidelines and the subsequent discussion about development of citywide VMT reduction strategy.

The Draft VMT Implementation Guidelines currently before the TAC for consideration are

intended to establish regulation to bring the City into compliance with SB 743. The Guidelines identify VMT thresholds and standardize the review process by which discretionary projects are reviewed and analyzed to assess environmental impacts in accordance with CEQA. The Draft SB 743 Implementation Guidelines are exclusively applicable to new discretionary projects subject to CEQA review. However, new projects make up a small fraction of total VMT generated citywide, as the vast majority of VMT are a result of existing uses, established policies, land use and zoning regulations, and economic drivers. Adoption of the VMT Implementation Guidelines can be done independent of any forthcoming VMT policy or set of policies that would be added to the General Plan through a General Plan amendment.

Citywide VMT policies aimed at achieving carbon neutrality will be comprehensive and most defensible if done in the context of the General Plan Update because they are subject to environmental review prior to adoption. A full accounting of current VMT and forecasting to future years will be conducted as part of the Climate Action Plan and is included in the scope of the forthcoming General Plan Update. It is expected that extensive land use and zoning changes, partnerships with regional entities to establish VMT banks/exchanges, as well as the development of a carbon sequestration component will be required in order to effectively reduce VMT citywide and begin to approach carbon neutrality. A significant financial investment will be needed in order to build out the City's bicycle and pedestrian network, expand public transit services, and fund other infrastructure, programs, or educational campaigns that realize a citywide shift to alternative travel modes. The scope of work for the forthcoming General Plan Update includes a detailed implementation plan with funding and financial strategies to link expected costs with revenues to achieve priority programs. Establishment of a citywide and regionally coordinated effort to address transportation and accessibility needs is essential to the feasibility of substantially reducing and eventually eliminating VMT.

While staff anticipates that a substantial part of the City's coordinated response to VMT reduction will culminate as part of the General Plan Update and relate to the larger discussion of land use and circulation, it is important to think of steps in the short term to continue to advance the City's effort toward carbon neutrality by 2030. In addition to recommendation of the VMT Implementation Guidelines, the following are some near term efforts that could be undertaken. The TAC may wish to provide input on these and other ideas for near term efforts to continue to address needed reduction in VMT while the larger discussion as part of the General Plan and Climate Action and Adaptation Plan is underway and in advance of updates to the transportation impact fee (TIF) program to center on VMT reduction.

- In accordance with General Plan policy 5-P-13 establish a Transportation Demand Management Plan Ordinance
- Consider Zoning Text Amendments to Chapter 11 of the Implementing Zoning Ordinance to eliminate required parking and/or adopt parking maximums
- Develop a pilot program for EV charger installation in public right of way (Berkeley model)
- Establish a bicycle (or scooter) share and/or subsidy program

- Create a framework for funding transit pass subsidies and/or active transportation and transit infrastructure or operational improvements
- Explore citywide market pricing public parking programs
- Explore local requirements to increase EV charging requirements for development projects
- Update the VMT Implementation Guidelines to reflect the General Plan VMT goals once adopted

Establishing VMT Implementation Guidelines furthers the City’s climate resolution by prioritizing VMT minimization in new projects, which concurrently reduces greenhouse gas emissions from fuel consumption. The purpose of the VMT Guidelines is to provide a framework within which environmental impacts are assessed for discretionary projects. While the thresholds established through adoption of the Guidelines influence GHG emissions for the transportation sector, reductions are limited to contributions from new development projects, which represent a fraction of the Citywide VMT and corresponding GHG emissions. The VMT Implementation Guidelines provide the framework for the City to regulate VMT in accordance with CEQA and are not in and of themselves the appropriate mechanism to achieve the City’s climate goals.

Roadway Multi-Modal Safety

Safety impact assessments for land use or transportation projects are intended to disclose the effects of a project on roadway user safety. As noted in the above section, CEQA requires the assessment of hazards and Caltrans recently released guidance about studying safety on state facilities. Safety assessments generally fall into the following four categories, with increasing level of effort:

- Review project site plans against local, state, national design standards
- Review nearby off-site connections for people walking, biking, driving, against design standards
- Existing safety – Analyze historic collision data
- Systemic safety – Assess potential collision risk

The City traditionally assesses safety on a case-by-case basis, relying on a combination of the first three items to ensure consistency with design standards and identify existing problematic locations. Formalizing the City’s guidelines for safety impact assessments would create more consistency and allow for a holistic approach to safety, consistent with the TAC’s requests related to VMT mitigation. Additionally, in recent years, the data, tools, and programs available to analyze roadway safety have increased and national design standards have been updated to reflect an increased focus on safety for people walking and bicycling. This includes systemic safety programs such as Vision Zero or local road safety plans that allow jurisdictions to identify the potential collision risk of the roadway network. These predictive models can be especially helpful for infill development sites with historically low activity levels because an assessment of historic collision data for locations with few people walking and bicycling may not reflect future hazardous conditions when this activity increases.

On October 19, 2020, the Petaluma City Council adopted a resolution authorizing a professional services agreement for a local road safety plan (LRSP).⁴ The City of Petaluma is one of nine jurisdictions in Sonoma County including SCTA that have undertaken a coordinated effort to prepare LRSPs. The city's LRSP will create the framework to systematically identify and analyze safety problems and recommend safety improvements for all users including bicycles and pedestrians. Once complete, the City could incorporate the LRSP framework and findings into the safety impact assessment process to ensure land use and transportation changes further the City's goals of improving roadway safety for all users. Presenting information from the LRSP within an impact analysis for land use developments will also address Caltrans' new guidance for the study of safety on state facilities.

2025 Petaluma General Plan/EIR

The Petaluma General Plan/ Environmental Impact Report (EIR) assessed transportation and circulation using the Level of Service (LOS) metric and does not provide a programmatic framework within which citywide VMTs have been evaluated. Nonetheless, the General Plan and EIR establish the policy and regulatory framework to guide land use decisions. Projects that are consistent with the General Plan land use designation and zoning district regulation have been analyzed at the programmatic level in the City's certified General Plan EIR and typically do not require subsequent environmental review unless there are project specific or site-specific impacts and the City through requested entitlements has the discretion to impose mitigation.

The forthcoming General Plan Update is an opportunity to assess VMTs citywide and comprehensively evaluate land use designations, policies, and programs to achieve the city's VMT objectives. As the General Plan Update moves forward, a land use development pattern that achieves the maximum VMT reduction is expected to be among the alternatives considered. Some of the strategies to minimize VMT through the General Plan Update may include increased mix of land use types in geographic areas, increasing density near transit, establishing bike and pedestrian friendly nodes to promote use beyond the ½ mile radius from major transit stops, expanding transit routes and frequency, and developing parking strategies to incentive non-auto modes (e.g., parking maximums and pricing programs).

The General Plan Update process will consider opportunities to enhance bicycle, pedestrian, and transit services citywide, provide safe and convenient pathways, and unbundle parking. VMT reduction across all sectors including existing land uses and new development aligns with the City goals regarding quality of life and safety, commitment to sustainability, and the climate.

The General Plan Update is a discretionary project that requires review under CEQA. It is expected that a programmatic (EIR) will be developed that discloses the potential environmental effects associated with implementing the General Plan Update. A comprehensive transportation and circulation assessment will provide a citywide evaluation of VMT generated by the land use mix and development potential identified in the General Plan. Evaluating the City's transportation network through a VMT lens is expected to result in new and different land use and transportation strategies relative to the existing General Plan.

⁴ City Council Staff Report October 19, 2020, Authorizing a PSA for a local Road Safety Plan.
https://petaluma.granicus.com/MetaViewer.php?view_id=31&event_id=45098&meta_id=469863

Urban Growth Boundary

The City's land use development pattern is influenced by the urban growth boundary (UGB), which was established in 1998 and ensures that urban development and infrastructure are contained within the UGB limits through December 31, 2025. As mentioned above, an UGB is one of the mechanisms to achieve VMT reduction by concentrating growth within the urban area, thereby reducing urban sprawl, trip lengths, and trip volumes.

The City's UGB has been retained since it was established and there continues to be opportunities for growth and development within the limits of the UGB. As part of the General Plan Update and Housing Element process the limits of UGB and the ability to accommodate the City's housing allocation will be evaluated.

Petaluma Goals and Priorities

The City of Petaluma Goals and Priorities (2019-2021) identify a number of workplan items relating to infrastructure improvements to encourage alternative travel modes including the Petaluma Boulevard South Road Diet (workplan Item 18), a citywide bike share program (workplan item 19) and an update to the City's Bicycle and Pedestrian Plan (workplan item 26). Encouraging the use of alternatives modes of travel reduces the amount of driving, which reduces VMT. Measures that promote the use of alternative travel modes and construct planned bicycle and pedestrian infrastructure could be used to mitigate VMT impacts.

LOS General Plan Policy

General Plan policy 5-P-10 states that "LOS should be maintained at Level D or better for motor vehicles due to traffic from any development project." The City of Petaluma General Plan EIR, assessed buildout of the 2025 General Plan and identified potentially significant impacts due to LOS exceedance. Although LOS is no longer applied to assess environmental impacts to transportation, the General Plan EIR, which was certified in 2008 through resolution 2008-084, included a statement of overriding considerations. The General Plan EIR concluded that buildout would result in unacceptable LOS at six intersections within the City⁵, but found that economic, legal, social, technology or other considerations outweighed significant environmental effects.

Motor vehicle delay in the City of Petaluma has continued to degrade and motorists experience extended wait times due to the volume of vehicles on the road especially during peak hour periods and school start and release, as well as vehicle delays due to SMART operations. Roadways in downtown Petaluma are largely built out and further widening or expansion, which traditionally have been employed to correct LOS deficiencies, are recognized as perpetuating reliance on motor vehicles. Reducing LOS delay can be accomplished by minimizing VMTs, promoting a shift in transportation from automobile to other travel modes, and through land use planning where goods services and employment opportunities are accessible by walking, biking, or public transit.

The City will need to consider how to treat LOS outside of the CEQA process. The LOS Traffic Impact Studies Guidelines, described below, will provide the procedural requirements for roadway

⁵ 1) McDowell Boulevards North/Corona Road; 2) Lakeville Street/Caulfield Lane; 3) Lakeville Street/ East D Street; 4) Petaluma Boulevard South/ D Street; 5) Sonoma Mountain Parkway/Ely Boulevard South/East Washington Street; and 6) McDowell Boulevard North/ Rainier Avenue.

operational compliance. It is recommended that Policy 5-P-10 be reevaluated through the General Plan Update process and revised as appropriate to reflect the shift from LOS to VMT.

LOS Traffic Impact Studies Guidelines (Informal)

The City's Guide for the Preparation of Traffic Impact Studies (TIS) include guidance on assessing project level impacts on the city's transportation operations including the level of service standard (LOS). The TIS Guidelines have not been formally adopted, but city practice has been to routinely require preparation of a TIS at the City Engineer's discretion and in general for projects that generate more than 50 peak hour trips. Although LOS is no longer used to assess environmental impacts under CEQA, LOS analyses continue to provide valuable information on the City's operating conditions and how projects might affect the transportation network. One of the considerations discussed through the VMT implementation process is how the City will treat LOS moving forward.

Once the City has completed the VMT Guidelines process it is recommended that the City Traffic Engineer revise the City's TIS Guidelines to standardize report requirements, methodology, and roadway improvement options to ensure that operations are maintained in accordance with City objectives. This revision should be completed in coordination with the safety impact assessment approach described under the Roadway Multi-Modal Safety approach.

VMT TAC PROCESS

The role of the TAC is to consider key decisions and provide input and feedback to inform the VMT Implementation Guidelines. Input received from the prior two TAC meetings has shaped the recommendation set for in the Draft SB 743 Implementation Guidelines, now before the TAC for consideration and recommendation. Following this third TAC meeting, input will be used to augment, refine, and clarify the Draft SB 743 Implementation Guidelines prior to being considered by Planning Commission and City Council.

Following TAC's review of the Draft VMT Implementation Guidelines, additional refinements will be made and will guide staff's recommendations, which will then be presented to decision making bodies including at least one public hearing before the Planning Commission and at least one public hearing before the City Council. Following the third VMT TAC meeting, the role and function of the TAC regarding the SB 743 VMT Implementation Guidelines is expected to be fulfilled.

PUBLIC OUTREACH

Establishing the City of Petaluma's SB 743 VMT Implementation Guidelines is a public process with multiple opportunities to participate, provide input, and feedback, including during the VMT TAC meetings. The City created and has maintained a VMT webpage providing information on the process, links to all past public hearings, staff reports and attachments, and materials referenced.

ATTACHMENTS

Attachment 1: Draft SB 743 Vehicle Miles Traveled Implementation Guidelines (March 2021)

- Exhibit A: Trip Length Adjustments
- Exhibit B: Draft CEQA VMT Transportation Impact Analysis Guidelines
- Exhibit C: Methodologies to Quantify VMT Reductions
- Exhibit D: CAPCOA Guidance on Combining TDM Strategies