

Memorandum

Date: June 16, 2020
To: City of San Rafael General Plan Team
From: Bob Grandy, Fehr & Peers
Subject: **Recommendations for SB743 Thresholds for San Rafael**

SF19-1020

This memorandum describes recommendations for initial VMT significance thresholds to be applied by the City of San Rafael as of July 1, 2020, as required for implementation of Senate Bill (SB) 743. These recommendations are informed by input provided at City Council study sessions in 2019 on June 3 and December 2 and are generally consistent with State guidance.

SB 743 eliminates the use of automobile delay from the CEQA environmental review process and the determination of CEQA transportation impacts. The new metric required by the CEQA Guidelines is vehicle-miles traveled (VMT). The shift from automobile delay to VMT changes the focus of transportation impact analysis in CEQA from measuring impacts to drivers, to measuring the impact of driving. CEQA transportation studies should continue to evaluate the effects of a project on safety as well as the facilities and services related to transit, pedestrians, scooters, and bicycles.

SB 743 takes full effect on July 1, 2020; after that time, all transportation impact analysis for CEQA related to land use plans and land use projects must rely on VMT. CEQA Statute Section 21099(b)(2) states that upon certification of the 2018 CEQA Guidelines, Level of Service (LOS) shall not be considered a significant impact on the environment.

The following section provides a summary of recommendations for VMT significance thresholds. It is followed by a section that provides additional background on those VMT significance thresholds as well as a draft summary of how LOS may continue to be used during entitlement review by the City of San Rafael after July 1, 2020.



Summary of VMT Significance Threshold Recommendations

California law¹ 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.

As described above, the following recommendations for initial VMT significance thresholds to be applied by the City of San Rafael as of July 1, 2020 are based on input provided at two City Council study sessions and guidance provided by the Governor's Office of Planning and Research (OPR). The following excerpt from the OPR *Technical Advisory* provides the overarching recommendation for VMT significance thresholds (Quote from page 10 of the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018).

*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.***

The first step in applying the new VMT process will be to determine if a project meets one of several screening criteria. The purpose of the screening process is to quickly assess projects to support the presumption that they would either reduce VMT or would generate VMT below the city's threshold, which would qualify the project as a low VMT generator. This type of screening is most appropriate for projects that are consistent with the General Plan, are located in areas with existing low VMT generation rates, and have characteristics conducive to travel by transit, walking, or bicycling. For these projects, a project would be presumed to have a less than significant VMT impact. A qualitative discussion would be provided to justify this conclusion, and no mitigations would be required. Projects that are high VMT generators are not eligible for screening. The VMT screening process is similar to the process currently applied by San Rafael staff to determine whether a LOS assessment is required for a project. The current LOS screening process is based on a peak hour vehicle trip criterion.

¹ Section 21099 of California Public Resources Code codifies the required changes to the guidelines implementing CEQA as mandated in Senate Bill 743. Section 21099 includes a requirement that the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse emissions, the development of multimodal transportation networks, and a diversity of land uses".



For projects that do not meet one of the screening criteria, a quantitative VMT analysis would be required to assess whether the project exceeds a defined VMT threshold and thus would result in a significant VMT impact. If a significant VMT impact is identified based on that analysis, mitigation measures would be identified. VMT thresholds are needed for land use projects and land use plans while the city has discretion whether to use VMT (and therefore set thresholds) for transportation projects that require a CEQA analysis. **Tables 1 and 2** below present recommended screening criteria and VMT thresholds.

Table 1: Recommended Screening Criteria

Project or Area Type	OPR's Suggested Criteria	Recommended Criteria
Small Developments	Projects that generate fewer than 110 trips per day. This may equate to non-residential projects of 10,000 sq. ft., or less and multi-family residential projects of 20 units or less.	√
Residential and Office Projects in Low-VMT Areas	Map-Based Screening of Residential and office projects that are located in low-VMT areas ² that have similar features (i.e., density, mix of uses, transit accessibility) with nearby uses.	√
Projects in Proximity to Major Transit Stops	Projects that are located within ½ mile walking distance of a high-quality transit corridor or major transit stop ³ . Additional criteria include high density (minimum floor area ratio of 0.75), reduced parking supply, consistency with <i>Plan Bay Area 2040</i> (http://2040.planbayarea.org/), and no effect on existing affordable residential housing.	√
Affordable Housing	Projects containing a high percentage of affordable housing or the addition of affordable housing to infill locations.	100 percent affordable housing projects
Local-Serving Retail	Local-serving retail projects of 50,000 sq. ft. or less.	√
Transportation Projects	Transit, bicycle, pedestrian, and roadway operational or maintenance (i.e., street improvements that do not increase vehicle capacity) projects that do not lead to a measurable and substantial increase in vehicle travel.	√
Downtown San Rafael	N/A	All residential and local-serving retail (less than 50,000 sf) projects.

² Residential projects that locate in areas 15% below existing regional average, and office projects that locate in areas 15% below regional average could presume to be low-VMT areas.

³ 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.”). 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.”).



The local-serving retail screening would apply only to stores of 50,000 square feet or less. Local-serving retail are uses that, when added into a community, improve retail destination proximity and thus shorten trips and reduce VMT. Regional-serving retail are uses that result in longer vehicle trip lengths. In making a determination as to whether a project is local-serving, the City of San Rafael will refer to local zoning definitions as well as any available market studies or economic impact analyses that provide data on consumer travel behavior.

Table 2: Recommended VMT Thresholds of Significance

Project Type	Recommended VMT Threshold of Significance
Residential Projects	<ul style="list-style-type: none"> A proposed project exceeding 15% below existing regional average VMT rate (per resident) would indicate a significant transportation impact.
Office Projects	<ul style="list-style-type: none"> A proposed project exceeding a 15% below existing regional average VMT rate (per employee) would indicate a significant transportation impact.
Retail Projects	<ul style="list-style-type: none"> A proposed project exceeding a 15% below existing Total VMT rate (per employee) would indicate a significant transportation impact.
Mixed-Use Projects	<ul style="list-style-type: none"> A proposed project exceeding 15% below existing regional average VMT rate (per service population) would indicate a significant transportation impact. Alternatively, each land use type in a proposed mixed-use project can be evaluated independently against the residential, office, and retail thresholds above. The analysis of each use should take credit for internal trip capture.
Other Project Types	<ul style="list-style-type: none"> The City will either develop an ad hoc (i.e., project-specific) VMT threshold for a unique land use type or apply the most applicable of the above thresholds depending on project characteristics. In general, a proposed project exceeding 15% below existing regional average VMT for similar land uses would indicate a significant transportation impact.
Redevelopment Project	<ul style="list-style-type: none"> Where a proposed redevelopment project replaces an existing VMT-generating land uses, if the redevelopment project leads to a net overall decrease in VMT, the project would cause a less than significant transportation impact. If the redevelopment project leads to a net overall increase in VMT, it may cause a significant transportation impact if proposed new residential, office or retail land uses would individually exceed their respective thresholds. If a mixed-used project, the analysis of each use will take credit for internal trip capture.
Transportation Projects	<ul style="list-style-type: none"> A proposed project that results in a net increase in total VMT would indicate a significant transportation impact.
Area Land Use Plans	<ul style="list-style-type: none"> 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 individually exceed their respective thresholds or cause an aggregate metric (e.g., Total Project-Generated VMT per service population) to exceed 15 percent below the plan area baseline.



Background on VMT Significance Thresholds

When applying the above VMT thresholds that involve using a VMT rate, a project's VMT rate is compared to a baseline VMT rate that is the regional average. The baseline VMT rate represents existing conditions and changes over time. The 15 percent reductions for residential or office uses are based on partial VMT measured as a light-duty vehicle (i.e., passenger cars and light-duty trucks) project generated VMT rate. The 15 percent reduction for retail use is based on a Total VMT rate.

Forecasts developed using the new Marin County Travel Model recently developed by the Transportation Authority of Marin (TAM) yield the following VMT data for residential and office uses in San Rafael.

Residential VMT (Home-based VMT per resident)

- Current (2020) Residential Home-Based Citywide Average: 12.2 VMT per resident
- The 2020 residential citywide VMT average rate is about 10 percent lower than the regional VMT average rate
- By 2040, with the proposed General Plan land uses in combination with regional land use and network changes, the residential citywide VMT average rate would decline by about 7 percent from today's citywide VMT average rate and be about 16 percent lower than the current regional VMT average rate
- By 2040, with the proposed General Plan land uses in combination with regional land use and network changes, the average Residential Home-Based VMT rate for Downtown San Rafael would be about 28 percent lower than the current regional VMT average rate

Office VMT (Home-based Work VMT per employee)

- Current (2020) Office Home-Based Work Citywide Average: 18.1 VMT per employee
- The 2020 office citywide VMT average rate is about 7 percent higher than the regional VMT average rate
- By 2040, with the proposed General Plan land uses in combination with regional land use and network changes, the office citywide VMT average rate



would decline by 7 percent from today's citywide VMT average rate and be similar to the current regional VMT average rate

- By 2040, with the proposed General Plan land uses in combination with regional land use and network changes, the average Office Home-Based Work VMT rate for Downtown San Rafael would be about 4 percent lower than the current regional VMT average rate

The above VMT forecasts, that show the average Residential Home-Based VMT rate for Downtown San Rafael would be about 28 percent lower than the current regional VMT average rate with the proposed General Plan uses by 2040, is the basis for the screening recommendation that residential uses in the downtown area could be presumed to have a less than significant VMT impact and be screened from performing a quantitative VMT impact analysis.

Future LOS Applications

Based on input provided at City Council study sessions in 2019 on June 3 and December 2, the City of San Rafael will conduct a LOS analysis for future projects located outside Downtown San Rafael if triggered by the current LOS screening criteria. The LOS assessment will be based on the General Plan threshold that is applicable at the time the analysis is conducted. The LOS assessment will include an evaluation of intersections based on the project trip generation and distribution characteristics. In general, intersections will be evaluated where 50 or more peak hour trips are added by a proposed project.

Future Transportation Analysis

Under the updated CEQA Guidelines, CEQA transportation analyses will focus on VMT, multi-modal access, transit, bicycle and pedestrian, and safety concerns rather than vehicular delay.

LOS analysis would not be included in the transportation analysis for CEQA but would be performed as part of entitlement review for projects located outside Downtown San Rafael that trigger the current LOS screening criteria. The results of the LOS assessment would inform the entitlement process and related conditions of approval.

Smaller projects that do not trigger an LOS assessment may be required to prepare a focused Local Transportation Assessment (LTA) that addresses the effect of the project on intersections and active transportation facilities immediately adjacent to the project as well as the proposed project access points and any proposed changes to parking or curb use.