



The City of Sonoma has not yet formally adopted CEQA thresholds of significance based on the metric of vehicle-miles traveled (VMT) as prescribed by Senate Bill 743 (2013). Because a VMT-based CEQA threshold of significance has not yet been adopted by the City, the determination that mitigation would reduce the VMT impact to a less than significant level requires additional investigation and evidence. The CEQA Statute and Guidelines establish an expectation for lead agencies to mitigate impacts to the extent feasible. As such, a reasonable basis for determining appropriate mitigation is to establish feasible VMT reduction expectations based on the project's land use context.

The publication *Quantifying Greenhouse Gas Mitigation Measures* (California Air Pollution Control Officers Association, 2010) suggests that the generalized maximum VMT reduction potential for a land use project in a suburban center context is 15 percent. Given the type of project in question (tourist-serving hotel) and land use context (Sonoma Plaza area), the 15 percent reduction in VMT was established as a performance metric to include in the proposed mitigation measure.

The specific mitigation action is to require that the project applicant (or project site operator) select and implement a combination of the strategies from Table 1 such that the VMT generated by the project would be 15 percent below the calculated benchmark for a typical, similar sized hotel project in the Sonoma Valley (described further in this document). Table 1 consists of transportation demand management (TDM) strategies that are designed to reduce vehicle trips or trip lengths. For each strategy, the menu provides a detailed description along with potential VMT reductions and the intended users of the strategies.

Project VMT Benchmark Estimate and Mitigation Performance Target

A benchmark VMT estimate for a typical, similarly sized hotel project was prepared and documented in a technical memorandum, provided as Attachment A. The estimate was prepared by Fehr & Peers using mobile device data, also colloquially known as “Big Data,” to estimate an average trip length for hotels in the Sonoma Valley area. The specific type of mobile device data used in the analysis is known as Location Based Services (LBS) data, which passively and anonymously tracks trips from mobile devices, primarily smart phones. LBS data is carrier-neutral and uses multiple location technologies, providing few gaps in coverage and high spatial precision. This data captures the full length of trip, consistent with Senate Bill 743 guidelines.

Trip length data was acquired and averaged for three hotel sites in the vicinity of the proposed project site, and multiplied by the estimated trip generation included as part of the Hotel Project Sonoma Revised Draft EIR (July 2018). From this process, a project benchmark VMT estimate of 9,635 vehicle-miles traveled per weekday was calculated. This benchmark estimate takes no additional



reductions for proximity of the project site to compatible land uses that may be accessed by walking, bicycling or transit, and thus the benchmark represents the VMT generated by a typical, 62 room hotel project in the Sonoma Valley where most visitors and employees drive to the site.

Based on this benchmark VMT estimate, the mitigation measures selected by the project applicant from Table 1 must reduce the total project generated vehicle-miles traveled per weekday to a performance target of 8,189 vehicle-miles in order to meet the 15 percent reduction target for a less than significant impact. The effectiveness of the mitigation measures must be monitored to ensure compliance with the performance target.

The project site is located very near the Sonoma Plaza area, and it is likely that a portion of the trips generated by the project would be made by walking or bicycling to/from compatible land uses in the Sonoma Plaza area. As noted in the analysis of Attachment A, it is estimated that the actual trip generation for the proposed project would be 7.5 percent lower than the number of weekday trips estimated in the RDEIR, as the trip generation estimate in the RDEIR assumes no reductions for walking or bicycling to nearby destinations.

This estimated trip generation reduction represents approximately one-half of the project VMT reduction necessary to meet the performance target of 8,189 vehicle-miles per weekday. Therefore, the project must implement TDM strategies from Table 1 such that project VMT would be reduced by the remaining 7.5 percent required to meet the performance target, as demonstrated by monitoring (described below).

The mitigation measure is that, prior to the issuance of a building permit, the Project Applicant (or project site operator) shall prepare a VMT Strategy Report that includes the following items:

- Identification of baseline VMT estimate from travel surveys or commercially available mobile-device data
- Identification of selected TDM strategies per Table 1
- Demonstration of how the VMT generated by the project would be 15 percent below the calculated baseline value through a combination of selected measures and the project's proximity to nearby compatible land uses

After implementing the TDM strategies selected in the VMT Strategy Report upon occupancy of the project, the effectiveness of these measures relative to the performance target noted previously must be monitored, as described in the following subsection.



Monitoring

The project shall be monitored by the City or by the project application/operator on an annual basis to determine the efficacy of the selected TDM strategies in achieving the performance target of 8,189 vehicle-miles of travel generated per weekday by the project site. The monitoring shall include project generated VMT estimates compatible with the methodology used to estimate benchmark VMT so that performance comparisons can be made. An annual monitoring memorandum shall be submitted to City staff. If the project site is found not to be in compliance with the mitigation measure, the project must incorporate additional TDM strategies from Table 1 to meet the performance target. Alternatively, the project applicant/operator may propose new strategies that develop over time to further reduce project generated VMT if substantial evidence is provided to support the efficacy of the strategy.

Implementation of the mitigation measure and monitoring program would reduce the project VMT impact to less-than-significant.

Table 1: Menu of VMT-Reducing Transportation Demand Management Strategies

Strategy	Description	% VMT Reduction	Target
Unbundle Parking Costs from Property Cost	Separate parking from hotel stay costs, requiring those who wish to purchase parking to do so at an additional cost.	2.6 – 13.0%	Guests
Commute Trip Reduction Program	Implement a multi-strategy program that encompasses a combination of individual measures, designed to discourage single-occupancy vehicle trips and encourage alternate modes such as carpooling, transit, walking, and biking. The program should include: - Carpooling encouragement - Ride-matching assistance - Preferential carpool parking - Flexible work schedules for carpools - Half time transportation coordinator - Vanpool assistance - Bicycle end-trip facilities (parking, showers and lockers)	1.0 – 6.0%	Employees



Table 1: Menu of VMT-Reducing Transportation Demand Management Strategies

Strategy	Description	% VMT Reduction	Target
Ride-sharing Program	Increasing vehicle occupancy by ride sharing will result in fewer cars driving the same trip, and thus a decrease in VMT. The project will promote ride-sharing programs through a multi-faceted approach such as: - Designating passenger loading, unloading, and waiting areas for ride-sharing vehicles - Providing a web site or message board for coordinating rides - Promoting ride-matching apps such as Waze Carpool, Carma, or the Sonoma County 511 program.	2.5 – 8.3%	Employees
Subsidized or Discounted Transit Program	Provide subsidized/discounted daily or monthly public transit passes. The project may also provide free transfers between all shuttles and transit to participants.	0.3 – 20.0%	Both
Commute Trip Reduction Marketing	Implement marketing strategies that promote commute alternatives to employees. Strategies may include new employee orientation of trip reduction and alternative mode options, event promotion, and publications.	0.9 – 26.0%	Employees
New Employee Commute Orientation	Incorporate information on commute alternatives and benefits into orientation and new-hire packets for employees.	Limited unless bundled with companion strategies	Employees
Employee Parking "Cash-Out"	The project will require employers to offer employee parking "cash-out." The term "cash-out" is used to describe the employer providing employees with a choice of forgoing their current subsidized/free parking for a cash payment equivalent to the cost of the parking space to the employer.	3.0 – 7.7%	Employees
Transportation Resource Guide	Provide "How to Get Around" resources to guests. Include concierge service information about non-motorized and alternative transportation options for the area.	Unknown.	Guest