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Title:	Report regarding a resolution to update the City of South San Francisco's transportation impact analysis thresholds, as required by the California Environmental Quality Act (CEQA), to comply with state-mandated change from level of service (LOS) to vehicle miles traveled (VMT), pursuant to Senate Bill 743 (2013) and new 2019 CEQA Guidelines. (Chris Espiritu, Senior Planner and Billy Gross, Senior Planner)		

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Attachments: 1. Att 1 - VMT Memo by Fehr & Peers, 2. Att 2 - OPR SB 743 Technical Advisory (December 2018), 3. Att 3 - Planning Commission Reso 2853-2020, 4. Att 4 - VMT Staff Presentation

Date	Ver.	Action By	Action	Result
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Report regarding a resolution to update the City of South San Francisco's transportation impact analysis thresholds, as required by the California Environmental Quality Act (CEQA), to comply with state-mandated change from level of service (LOS) to vehicle miles traveled (VMT), pursuant to Senate Bill 743 (2013) and new 2019 CEQA Guidelines. (*Chris Espiritu, Senior Planner and Billy Gross, Senior Planner*)

RECOMMENDATION

Staff recommends that the City Council , as recommended by the Planning Commission, adopt a resolution updating the City of South San Francisco's transportation impact analysis thresholds to comply with state-mandated change from level of service (LOS) to vehicle miles traveled (VMT), pursuant to Senate Bill 743 and new 2019 California Environmental Quality Act (CEQA) Guidelines.

EXECUTIVE SUMMARY

Senate Bill (SB) 743 requires changes be made to the method by which agencies analyze transportation impacts under the California Environmental Quality Act (CEQA). It modifies the environmental review process by removing automobile delay (as described by Level of Service (LOS)) or similar measures of vehicular capacity or traffic congestion, as a significant impact on the environment pursuant to CEQA. Instead of LOS, SB 743 requires that CEQA assessments for transportation impacts completed after July 1, 2020 be based on Vehicle Miles Traveled (VMT), a measure of how much driving is generated by a project, to better align with state greenhouse gas (GHG) reduction goals. In keeping with SB 743, staff is recommending appropriate VMT thresholds to allow the City of South San Francisco to transition to the VMT metric to assess environmental impacts.

BACKGROUND

The State of California has adopted several bills over the last decade in an effort to reduce GHG emissions and the effects of climate change. The transportation sector (including private automobiles) is one of the largest producers of GHG emissions. Targets for GHG emission reductions have been established and substantial regulatory efforts are underway to ensure that these reduction targets are met.

Reducing the amount of automobile travel throughout the state is one of the major strategies being put forth to reduce GHG emissions. In an effort to reduce auto travel, the State is questioning the traditional use of LOS and congestion-related traffic analysis. Reducing traffic congestion and improving LOS by increasing roadway capacity promotes or induces additional vehicle trips, thereby increasing the total amount of traffic and transportation related GHG emissions. Additionally, by prioritizing the movement of automobiles over other modes of travel through measures such as wider roadways, the use of LOS has also constrained the use of alternative modes of transportation (e.g., transit, bicycles, walking) that reduce transportation related GHG emissions.

Adopted in 2013, SB 743 balances the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions by eliminating traffic congestion as a significant impact under CEQA. It requires the Governor's Office of Planning and Research (OPR) to amend CEQA Guidelines by developing alternative criteria for determining the significance of transportation impacts of projects within transit priority areas. These criteria must promote "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses". In particular, the measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated". Once the CEQA Guidelines are amended to include those alternative criteria, auto delay will no longer be considered a significant impact under CEQA. (Public Resources Code Section 21099(b))

Pursuant to SB 743, OPR adopted new CEQA guidelines in 2018, including the new Guidelines Section 15064.3, specifying that a project's effect on automobile delay no longer constitutes a metric for determining significant environmental impact related to transportation, and analysis will now be related to the amount and distance that a project might cause people to drive, via a new metric, VMT. The metric shift from LOS to VMT focuses on regional traffic patterns and reducing GHG emissions, rather than vehicle delays on local roadway networks. Per the revised CEQA Guidelines, all determinations of transportation impacts under CEQA must be based on VMT analysis after July 1, 2020.

The OPR most recently published a *Technical Advisory on Evaluating Transportation Impacts in CEQA* in December 2018 to provide technical guidance and recommendation on assessment of VMT, thresholds of significance, and mitigation measures. This Technical Advisory provides support for determining the screening criteria and thresholds of significance based on VMT, and is attached to this report as Attachment 2.

DISCUSSION

Current City Policies related to LOS and CEQA Review of Traffic Impacts

Currently, the City's General Plan Transportation Element has multiple policies related to LOS and one related

to VMT, but not specifically related to applying VMT as a threshold of significance for purposes of impact review under CEQA:

Street System

4.2-G-10 Make efficient use of existing transportation facilities and, through the arrangement of land uses, improved alternate modes, and enhanced integration of various transportation systems serving South San Francisco, strive to reduce the total vehicle-miles travels.

Traffic Operations and Service Standards

4.2-G-15 Strive to maintain LOS D or better on arterial and collector streets, at all intersections, and on principal arterials in the CMP during peak hours.

4.2-G-16 Accept LOS E or F after finding that:

- There is no practical and feasible way to mitigate the lower level of service; and
- The uses resulting in the lower level of service are of clear, overall public benefit.

4.2-G-17 Exempt development within one-quarter mile of a Caltrain or BART station, or a City-designated ferry terminal, from LOS standards.

Level of Service

4.2-I-17 Design roadway improvements and evaluate development proposals based on LOS standards.

4.2-I-18 Implement, to the extent feasible, circulation system improvements illustrated in Figures 4-1, 4-2 and 4-3 prior to deterioration in levels of service below the stated standard.

In addition to the Transportation Element, the City's Climate Action Plan identifies community policies, programs and projects to reduce GHG emissions *and* VMT:

Land Use and Transportation Goal LUT1: Reduce Emissions from Transportation

Measure 1.1 Expand active transportation alternatives by providing infrastructure and enhancing connectivity for bicycle and pedestrian access.

Measure 1.2 Support expansion of public and private transit programs to reduce employee commutes.

Measure 1.3 Integrate higher-density development and mixed-use development near transit facilities and community facilities, and reduce dependence on autos through smart parking practices.

While local agencies are required to adopt and utilize a VMT threshold for CEQA transportation analysis by July 1, 2020, they may still retain LOS as a standard for local planning and/or general plan compliance purposes. LOS analysis could continue to be useful in certain circumstances, such as identifying when an

intersection with stop signs should be replaced with a traffic signal, or to evaluate intersection operations when access to a site creates a new leg to the intersection.

The City of South San Francisco is currently working on multiple studies/plans that will further coordinate City policies related to transportation, including the implementation of VMT and LOS requirements.

- 2040 General Plan Update, which will set overarching policy goals
- Completed Mobility 20/20 transportation study for East of 101
- Updated East of 101 Specific Plan
- Active SSF Bicycle and Pedestrian Master Plan Update
- Zoning Ordinance Update, including a revised Transportation Demand Management Ordinance, as a companion to the updated General Plan
- Climate Action Plan Update
- Development of a Citywide Transportation Sub-Area Model
- Revised Citywide Transportation Impact Fee to capture multi-modal projects

At this time, the City cannot eliminate LOS analysis from transportation review unless the General Plan Transportation Element is amended to remove this analysis requirement, and staff is recommending that any such changes be incorporated into the larger General Plan Update process. Ultimately, the City will be able to comprehensively identify and prioritize all types of transportation projects through this larger process. Therefore, City staff is only recommending that the local impact threshold be amended from LOS to VMT Screening Thresholds and VMT Thresholds of Significance at this time to comply with the July 1, 2020 implementation deadline. Specific mitigations related to VMT impacts will be collected as part of the aforementioned planning efforts.

As part of the General Plan Update process, the City has contracted with Fehr & Peers as a sub-consultant to Raimi + Associates to provide transportation analysis. One of the included sub-tasks is to develop a VMT methodology and thresholds to be applied per new CEQA guidance, which will allow for future preparation of the General Plan Update EIR documents in accordance with the new VMT requirements. Fehr & Peers has prepared a “Proposed VMT Threshold and Analysis Methods” memo that is attached to this report (Attachment 1).

The VMT metric measures how many miles South San Francisco residents travel by vehicle (residential VMT), how many work-based miles employees who work in South San Francisco travel by vehicle (work VMT), or how many total vehicle miles include an origin and/or destination in South San Francisco (total VMT). As indicated in “Table 1: Draft Work, Residential and Total VMT, by Location” of the Fehr & Peers Memo, South San Francisco has a work VMT per employee that is 14 percent *higher* than the regional average, a residential VMT per resident that is 27 percent *lower* than the regional average, and a total VMT per service population that is 2 percent *lower* than the regional average. This means that most employment projects attract employees from the Bay Area region to South San Francisco and will likely have a significant VMT impact. On the other hand, new residential projects result in fewer miles traveled and will likely have a less than significant impact for CEQA purposes.

VMT Screening Thresholds

OPR recommends strategies to streamline projects (i.e., not require further transportation analysis) that are proposed in locations that have close proximity to transit or in low-VMT areas, or that fit within a size threshold. If a project meets screening thresholds or falls within the types of transportation projects listed, then it is presumed VMT impacts would be less than significant for the project and a detailed VMT analysis is not required. Staff is recommending that the following screening thresholds be set.

Location-Based Screening for VMT

- Proximity to Transit - Projects within ½ mile walkshed of an existing or planned high-quality fixed route transit corridor (SamTrans ECR or SamTrans 130 routes) or major transit station (SSF BART, San Bruno BART, SSF Caltrain) should be presumed to have no impact on VMT per CEQA Guidelines section 15064.3(b)(1). Upcoming changes to the SamTrans bus network and the East of 101 shuttle services may allow some additional areas to be screened out of VMT analysis in the future. (See Figure A in Attachment 1)

Ferry terminals only qualify for screening if they are served by high-quality bus service, which is not the case for the SSF Ferry Terminal under current conditions; however, this could change in the future with bus service changes.

- Low-VMT Zones. Residential projects located in low-VMT zones (see Figure B in Attachment 1) would require only a qualitative discussion of VMT to discuss the travel characteristics of the zone that the project is located within.

VMT Screening on Project Size and Type (per OPR Guidelines)

- Projects attracting fewer than 110 trips per day.
- Local-serving retail at a size less than 50,000 square feet
- 100-percent affordable residential developments in infill locations

VMT Impact Thresholds

If a project does not fit within one of the screening thresholds identified above, it would then be required to provide further VMT analysis to determine if the project will have any impact in relation to transportation. In its 2018 Guidelines, OPR recommends a reduction in VMT of 15 percent below the regional average. Staff is recommending that the City of South San Francisco follow OPR's recommendation at this time, with the ability to amend this threshold as part of the larger General Plan Update process in the future. Following are recommended thresholds of significance for specific project types:

- For residential projects, a project would cause substantial additional VMT if it exceeds existing regional household VMT per capita minus 15 percent.
- For office projects, a project would cause substantial additional VMT if it exceeds the existing regional VMT per employee minus 15 percent.
- For mixed-use projects, each component of the mixed-use project would be evaluated independently,

per the significance criteria above.

- A land use plan may have a significant impact on VMT if it results in a net increase in total VMT and is not consistent with the region's Sustainable Communities Strategy.
- For retail uses, a project may have a significant impact on VMT if it would result in a net increase in Total VMT.
- For all other land uses, a project may have a significant impact on VMT if it would result in a net increase in Total VMT.
- For transportation projects, a project would cause substantial additional VMT if the project would result in a *net increase* in VMT. An assessment of total VMT without the project and then with the project would be made, and the difference in the two assessments is the amount of VMT attributable to the project.

Practical Impacts of Change to VMT

As discussed, South San Francisco has a work VMT per employee that is *higher* than the regional average, a residential VMT per resident that is *lower* than the regional average, and a total VMT per service population that is *slightly lower* than the regional average. This means that most employment projects in South San Francisco will have a significant VMT impact while many residential projects will likely have a less than significant impact. The Fehr & Peers memo includes examples of the transportation impact analysis for five hypothetical projects.

The biggest practical effects and changes to the CEQA process are the ability to screen projects and the type of mitigation measures that will be required for a proposed project with VMT impacts. Under current CEQA LOS standards, an employment project that was determined to have a significant impact would be required to provide typical LOS-related mitigations, such as roadway widening (which is typically infeasible in South San Francisco), turning lane or traffic queuing improvements, or other roadway infrastructure-related projects.

Under the proposed VMT standards, projects that meet screening criteria would experience a streamlined transportation analysis. Projects with VMT impacts would be required to consider typical VMT related mitigations such as offsite bike lanes and trails to improve access to transit stations, pedestrian improvements to provide a direct path to transit stops/stations, bus and shuttle infrastructure or service improvements, TDM measures beyond the current requirements, or the provision of on-site housing or amenities such as childcare, gym equipment and food service to reduce off-site trips. However, full mitigation of VMT impacts for employment may not be feasible since the City's VMT per worker is much higher than the regional average.

ENVIRONMENTAL REVIEW

The identification of the proposed VMT regulations is not a "project" pursuant to CEQA as defined in CEQA Guidelines Section 15378, and is therefore not subject to review pursuant to CEQA Guidelines Section 15060 (c)(3). Separately and independently, the proposal is also exempt pursuant to CEQA Guidelines Section 15061 (b)(3), as it will not result directly or indirectly in significant environmental impacts; and/or Public Resources Code Section 21080(b)(1), as the proposal is ministerial, because the City is mandated to adopt the proposal. As such, the new thresholds are categorically exempt pursuant to CEQA Guidelines Section 15308 and none of the exceptions in Section 15300.2 apply.

PLANNING COMMISSION

On May 21, 2020, the Planning Commission held a public hearing, reviewed the proposed VMT thresholds, and voted unanimously to recommend that the City Council approve the proposed resolution. The Planning Commission resolution is attached to this staff report.

The Commission inquired about the process for evaluating mitigation measures related to Transportation Demand Management (TDM) and how those measures would be applied to development projects. Staff clarified that projects are required to meet current code requirements related to TDM, and projects can implement additional measures to increase alternative mode splits. Until such time that more comprehensive VMT-related mitigation measures are adopted by the City as part of the General Plan Update process, each project would be evaluated on a case-by-case basis and project-specific mitigation measures would be addressed during each development project's transportation analysis.

The Commission also inquired about the frequency of updates to the regional average VMT metrics being used for comparison analysis with the City's VMT metrics and shared concerns about approving projects using outdated data in the future. Staff discussed that the Metropolitan Transportation Commission (MTC) and C/CAG travel demand models, which are used to calculate the regional average VMT metrics, are updated every five years. Projects evaluated between updates to the regional travel models would still be analyzed using the best-available data for analysis of regional VMT.

The Commission raised questions regarding flexibility in applicable mitigations and whether local roadway impacts would be addressed in the future. Staff clarified that screening projects per OPR guidance and implementing a VMT-based analysis does not prevent or limit the City's decision-making bodies from specific measures to reduce a project's effects. The change from LOS to VMT allows the City to ensure a project is consistent with the City's vision and goals, while maintaining flexibility in the type and extent of mitigations that can be implemented.

FISCAL IMPACT

The proposed VMT Thresholds will not have a direct fiscal impact on the City.

RELATIONSHIP TO STRATEGIC PLAN

The proposed VMT Thresholds help to achieve the following priorities of the City's Strategic Plan:

Priority #2: Quality of Life Initiative 2.2 - Excellent bike paths, pedestrian ways, and multi-modal transportation options.

The change in CEQA transportation impact analysis to VMT will ultimately result in Projects with VMT impacts being required to consider VMT related mitigations such as new bike lanes, pedestrian improvements to provide a direct path to transit stops/stations, and other alternative mode transportation options.

CONCLUSION

The mandate for using VMT thresholds for all CEQA analysis beginning July 1, 2020 offers the City the ability to holistically evaluate a project for emissions related impacts. Large employment development that will draw employees from the entire Bay Area region will be required to include mitigations that support transit use and on-site amenities; most residential projects will have a less than significant impact under the VMT metric and cannot be denied for local roadway impacts. If adopted, the proposed resolution would take effect on July 1, 2020, consistent with the timeline under CEQA to update the City's traffic impact analysis threshold.

Consistent with the report's discussion and pending adoption timeline, staff recommends that the City Council take the following action:

1. Adopt a resolution recommending updating the City of South San Francisco's transportation impact analysis thresholds, as required by the California Environmental Quality Act (CEQA), to comply with state-mandated change from level of service (LOS) to vehicle miles traveled (VMT), pursuant to Senate Bill 743 (2013) and new 2019 CEQA Guidelines.

Attachment:

1. VMT Memo by Fehr & Peers, dated May 11, 2020
2. CA OPR SB 743 Technical Advisory (December 2018)
3. Planning Commission Resolution 2853-2020
4. Presentation

Associated Documents:

1. VMT Resolution (20-314)
 - a. Exhibit A - City of South San Francisco VMT Thresholds