



City of Arts & Innovation

City Council Memorandum

TO: HONORABLE MAYOR AND CITY COUNCIL DATE: JUNE 16, 2020

FROM: PUBLIC WORKS DEPARTMENT WARDS: ALL

SUBJECT: VEHICLE MILES TRAVELED THRESHOLDS ADOPTION FOR CALIFORNIA ENVIRONMENTAL QUALITY ACT COMPLIANCE RELATED TO TRANSPORTATION ANALYSIS – RESOLUTION

ISSUE:

Adopt a resolution approving the Vehicle Miles Traveled thresholds for California Environmental Quality Act compliance assessment of transportation impacts.

RECOMMENDATIONS:

That the City Council:

1. Adopt a resolution approving Vehicle Miles Traveled thresholds for California Environmental Quality Act compliance related to transportation analysis, using thresholds consistent with current baseline Vehicle Miles Traveled levels as recommended by the Planning Commission;
2. Direct staff to conduct a workshop to educate the development community in the application of new vehicle miles traveled thresholds, and mitigation measures for vehicle miles traveled related impacts; and
3. Approve the methodologies and mitigation measures detailed within this report and within the updated Traffic Impact Analysis Guidelines.

COMMISSION RECOMMENDATION:

On May 14, 2020 the Planning Commission reviewed proposed methodologies, alternative thresholds of significance, and mitigation measures for Vehicle Miles Traveled in Riverside and, by a vote of 5 Ayes and 1 Noe with 2 Commissioners absent, recommended Alternative B – thresholds consistent with current baseline / average VMT levels as detailed within this report. During their discussion, the Planning Commission cited the desire to facilitate new housing within Riverside and a desire to remain comparable to neighboring agencies as part of their decision-making process.

BACKGROUND:

Historically, vehicle delay and congestion were the metrics used when evaluating transportation impacts. These delays are translated into letter grades, A through F, and are referred to as Level of Service (LOS). Following the enactment of Senate Bill 743, the California Governor's Office of Planning & Research was tasked with developing new California Environmental Quality Act (CEQA) Guidelines that eliminated Level of Service as a metric for transportation impact, and to find a replacement criteria. Vehicle Miles Traveled were selected as the appropriate metric, and written into revised CEQA Guidelines in December 2018.

To implement SB 743, the City of Riverside needs to determine appropriate Vehicle Miles Traveled (VMT) methodologies, thresholds, and feasible mitigation measures. Since VMT is a new methodology to analyze transportation impacts, there was a need to develop appropriate guidance for projects subject to environmental review. The guidance is to ensure that all projects subject to review by the City use the same data, approaches, and analytical tools. A study was conducted by the Western Riverside Council of Governments (WRCOG) to assist its member agencies in understanding the specific questions that need to be addressed when making these determinations and to provide research, analysis, and other evidence to support their final SB 743 implementation decisions.

In 2019, WRCOG published a document package detailing recommended VMT assessment methodologies, and in early 2020 WRCOG published a set of recommended Traffic Impact Analysis Guidelines. The recommendations provided within this report either are direct recommendations from the WRCOG analysis or have been adjusted to better suit the City of Riverside's needs. SB 743 and VMT must be implemented by July 1, 2020.

For many projects, the implementation of VMT as an environmental threshold is anticipated to significantly streamline the preparation of transportation environmental documents. As is further discussed in this report, due to Riverside's patterns of density and availability of high quality transit service, many projects are additionally anticipated to be 'screened out' of preparing a VMT assessment and will be presumed to have no significant impact. For projects not screened out, the assessment process for VMT will only compare to about 20-25% of the effort of preparing & reviewing a Level of Service analysis.

DISCUSSION:

Since SB 743 represents a significant departure from the City of Riverside's current practice, the City must address the following questions below prior to taking any action:

1. Methodology – What methodology should be used to forecast projected-generated Vehicle Miles Travelled (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?
2. Thresholds – What threshold options are available and what substantial evidence exists to support selecting a specific VMT threshold?
3. Mitigation – What would constitute feasible mitigation measures for a VMT impact given the land use and transportation context of the WRCOG region?

The methodology to forecast 'project-generated' VMT, the VMT thresholds, and the mitigation measures utilized must be adopted by the City.

Methodology:

Calculating Baseline VMT and Data Sources:

Western Riverside Council of Government's VMT calculation documentation investigated the use of the Southern California Association of Government (SCAG) model, the Riverside County Transportation Analysis Model (RIVTAM), and the use of data from the California Household Travel Survey. 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.

After a review of each data source, WRCOG recommended to utilize the Riverside County Travel Demand Model (RIVTAM / RIVCOM). Jurisdictions and technical experts have been utilizing RIVTAM since 2009, so there is a familiarity with the model. Further, 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 the model will be updated and refined to improve compliance with SB 743 expectations (i.e., full external trip lengths).

Tools Assessment:

The capabilities of travel forecasting models, along with 11 sketch model tools, were reviewed to determine their strengths and weaknesses in generating appropriate VMT results for SB 743 analysis and testing VMT mitigation strategies. Based on the travel forecasting model review, it is recommended that the RIVTAM be utilized for VMT impact analysis.

For thresholds that are based on an efficiency form of VMT, a customized forecasting and screening tool was also recommended, which would use RIVTAM model inputs and outputs. This tool would be utilized to provide an initial screening of potential VMT impacts for projects and provide evidence to support presumptions of less than significant impact findings. The sketch model tools were determined to be most appropriate for testing VMT mitigation. These tools rely on Transportation Demand Management (TDM) strategies to reduce VMT, an important limitation was highlighted that many of these strategies are dependent on building tenants, which can change over time. Hence, relying on TDM programs tied to tenants would likely result in the need for on-going monitoring to verify performance.

Thresholds:

Potential VMT thresholds were assessed 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). The project team, led by Fehr & Peers, identified four threshold options for consideration by lead agencies.

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

2. Thresholds consistent with Lead Agency air quality, greenhouse gas emissions reduction, and energy conservation goals (The City of Riverside Green Action Plan set a VMT reduction target of 15%);
3. Thresholds consistent with the Regional Transportation Plan / Sustainable Communities Strategy future year VMT projects by jurisdiction or subregion; and
4. Thresholds based on baseline VMT performance by jurisdiction or subregion. (Recommended Alternative B – Recommended by Planning Commission)

ALTERNATIVE A: Thresholds consistent with OPR's Technical Advisory

The State Department of Transportation, Caltrans, released guidelines supporting OPR-recommended thresholds. Additionally, several agencies including Irvine, Los Angeles, Santa Ana, San Jose, and Beverly Hills have or are anticipated to adopt thresholds generally consistent with OPR / Caltrans. The OPR thresholds are intended to meet the Greenhouse Gas Reduction targets and policies reflected in Assembly Bill 32, Senate Bill 32, Senate Bill 375, and Executive Order B-30-15. For these reasons, the City may consider utilizing the following thresholds in line with OPR's guidelines:

1. For new residential projects, utilizing a threshold consistent with 15% below the City's current VMT Per Capita.
2. For new office and industrial projects, utilizing a threshold consistent with 15% below the City's current VMT Per Employee.
3. For new retail & other land use projects, utilizing a threshold consistent with the net total VMT of the jurisdiction.

ALTERNATIVE B (Recommended by Planning Commission): Thresholds based on baseline VMT performance by jurisdiction

As part of the threshold establishment process, City Staff created a website detailing initially proposed thresholds and guidelines for adoption. The website is hosted at www.riversideca.gov/vmtupdate and contains additional background information to allow those interested to learn more about the subject. In response to the proposed thresholds, the Riverside Chamber of Commerce formed a VMT Task Force and invited City staff to engage with members of the housing, commercial, and industrial development communities.

The housing development community has expressed a concern that setting thresholds 15% below jurisdictional VMT will discourage the production of housing within Riverside. The task force additionally expressed concern with a lack of consistency within the region between agencies, and noted the City of Corona has adopted thresholds consistent with baseline VMT.

Because the City of Riverside is the dense urban core of the Western Riverside Council of Governments region, it is in general more VMT-efficient than the WRCOG regional averages. In fact, total VMT per service population is approximately 7% lower than the WRCOG average according to the study completed by Fehr & Peers. This is to say that compliance with a baseline threshold in Riverside can result in a comparative VMT efficiency within the subregion. Housing in particular within Riverside has been demonstrated to operate more efficiently, at approximately 25% below the WRCOG average.

Furthermore, the proposed final Southern California Association of Government's Regional Transportation Plan "Connect SoCal" proposes to achieve SB 375 GHG reduction and envisions VMT reductions throughout each subregion of the greater SCAG area. However, Connect SoCal does not set specific levels of VMT reduction associated with SB 743 implementation, and sets targets for each region for VMT reduction through alternative means. The proposed final plan states, "Connect SoCal has not taken any credits in regard to potential VMT reduction through SB 743 implementation."

New CEQA guidelines state "Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact." A threshold of 15% better than existing conditions is not written into CEQA, but rather the associated OPR advisory – which is not considered as law.

Given the above provisions, the City may consider the following reduced thresholds of significance as recommended by the Planning Commission:

1. For new residential projects, utilizing a threshold consistent with the City's current baseline VMT Per Capita.
2. For new office and industrial projects, utilizing a threshold consistent with the City's current baseline VMT Per Employee.
3. For new retail & other land use projects, utilizing a threshold consistent with the net total VMT of the jurisdiction.

Mitigation:

Transportation Demand Management (TDM) strategies and its effectiveness for reducing VMT were reviewed and assessed for relevancy. TDM strategies are methods to reduce vehicular demand for a project. Given WRCOG member agencies' rural / suburban land use context, the following key strategies were identified as the most appropriate by WRCOG:

- 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

Since the City is situated as the urban core of the WRCOG region, additional mitigation measures may be effective within Riverside, including:

- Increase diversity of urban and suburban development (mixed-use)
- Increase transit accessibility
- Integrate affordable & below-market rate housing
- Implement a car-sharing program
- Unbundle parking costs from property cost
- Increase transit service frequency / speed
- Price workplace parking

The City is also in conversations with the Riverside Transit Agency regarding the potential for developers to purchase employee commuter passes, or bus passes for disadvantaged communities that would offset VMT within the City.

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 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 in order to further assist lead agencies in implementing SB 743.

In addition to efforts led by WRCOG, the City of Riverside is using a portion of its SB 2 Planning funds to develop a VMT Mitigation Bank associated with projects identified within the City of Riverside PACT (Pedestrian Target Hardening, Active Transportation Master Plan, Complete Streets Ordinance, and Trails Master Plan). The implementation of a local mitigation bank would allow for development to implement VMT mitigation by paying a fair share towards a list of projects identified by Riversiders and vetted for VMT reducing capacity. The Mitigation Bank is anticipated to be available for use by early 2021.

Updated Traffic Impact Analysis Guidelines:

The City of Riverside's Traffic Impact Analysis Guidelines have been revised to ensure consistency with SB 743 implementation and are provided in Attachment 2. The revision incorporates VMT guidance consistent with the information from the WRCOG SB 743 Implementation Pathway Study and updates to the LOS guidelines currently being utilized.

The guidelines refer to the WRCOG screening tool that was developed for the SB 743 Implementation Pathway Study and provides directions for model use of projects that are likely not screened out. Mitigation measures and methods for quantification have been identified.

In addition, the current guidelines were updated to meet state-of-the-practice analysis techniques for LOS assessment. The existing language in the guidelines was also modified to reference improvements required instead of historic CEQA terminology in order to distinguish between CEQA and non-CEQA requirements. Lastly, the LOS naming was simplified to be more consistent with requirements in other jurisdictions statewide.

Project Screening From VMT Analysis:

In addition to screening opportunities for Level of Service analysis, the updated Traffic Impact Analysis Guidelines include several screening opportunities for new land use projects.

Step 1: Transit Priority Area (TPA) Screening

Projects located within a TPA may be presumed to have a less than significant impact absent

substantial evidence to the contrary. This presumption may **NOT** be appropriate if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75;
2. Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City), with input from the Metropolitan Planning Organization); or
4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Step 2: Low VMT Area Screening

Residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident or per worker that is similar to the existing land uses in the low VMT area – provided the VMT of the area falls below thresholds.

For this screening in the WRCOG area, the RIVTAM travel forecasting model was used to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs). TAZs are geographic polygons similar to Census block groups used to represent areas of homogenous travel behavior. Daily VMT per capita was estimated for each TAZ. This presumption may not be appropriate if the project land uses would alter the existing built environment in such a way as to increase the rate or length of vehicle trips.

To identify if the project is in a low VMT-generating area, the analyst may review the WRCOG screening tool and apply the appropriate threshold (identified later in this chapter) within the tool. Additionally, as noted above, the analyst must identify if the project is consistent with the existing land use within that TAZ and use professional judgement that there is nothing unique about the project that would otherwise be mis-represented utilizing the data from the travel demand model. It is important to note that the WRCOG map displays average VMT, and not the threshold VMT of 15% below average, users must 'drill down' using the WRCOG map to assess how area VMT relates to the threshold VMT. The WRCOG screening tool can be accessed at the following location: <http://gis.fehrandpeers.com/WRCOGVMT/>

Step 3: Project Type Screening

Local serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel.

In addition to local serving retail, the following uses can also be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are local serving in nature:

- Local-serving K-12 schools
- Local parks

- Day care centers
- Local-serving gas stations & car-washes
- Local-serving banks
- Local-serving hotels (e.g. non-destination hotels)
- Student housing projects
- 100% affordable housing projects
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- Projects consisting of 100% affordable housing
- Projects generating less than 110 daily vehicle trips
 - 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

FISCAL IMPACT:

There is no fiscal impact associated with this report.

Prepared by: Kris Martinez, Public Works Director
Certified as to
availability of funds: Edward Enriquez, Chief Financial Officer/Treasurer
Approved by: Rafael Guzman, Assistant City Manager
Approved as to form: Gary G. Geuss, City Attorney

Attachments:

1. Resolution
2. WRCOG VMT Implementation Pathway Documentation
3. Updated Draft Traffic Impact Analysis Guidelines
4. Planning Commission Minutes – May 14, 2020
5. Presentation