



VMT CEQA Requirement

FAQs

What is CEQA?

The California Environmental Quality Acts (CEQA) is a statute that requires State and local agencies to identify significant environmental impacts of land use and transportation projects and to avoid or mitigate those impacts, if feasible

What are the CEQA transportation requirements for the City of Santa Rosa?

The City of Santa Rosa is required to establish a standard for measuring traffic impacts of proposed developments and transportation projects. Until July 1, 2020, the standard Santa Rosa used to measure these impacts was Level of Service (LOS). The City per CEQA effective July 1, 2020 will be using Vehicle Miles Traveled (VMT) as the new standard to measure transportation impacts for CEQA analysis.

What is Level of Service (LOS)?

Level of Service (LOS) is a measure of traffic delay at signalized intersections or roadway segments. Level of Service uses a letter grade system ranging from LOS A, or free flow conditions with little or no delay, to LOS F, or congested traffic conditions with excessive delays.

What is Vehicle Miles Traveled (VMT)?

Vehicle Miles Traveled measures the distance a motorized vehicle will travel to a destination, divided by the number of passengers (i.e., per capita). Typically, development located farther from retail, office, and other uses and with poor access to transit, generates more driving than development situated close to complementary uses and transit. Cities use VMT to evaluate greenhouse gas emissions and some transportation impacts.

Why is the City Changing its Transportation Impact Policy?

The State in 2013 passed SB743 which required the establishment of a new method to determine the significance of transportation impacts of a project under CEQA. The Governor's Office of Planning and Research (OPR) has recommended that VMT replace LOS as the primary

measure of transportation impacts. The OPR Technical Advisory (dated December 2018) recommends that the threshold for residential and office projects be 15% below the existing per capita VMT.

Why did the State pass legislation to adopt this change?

SB743 states that “New methodologies under the CEQA are needed for evaluating transportation impacts that are better able to promote the State’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multi modal transportation system, and providing clean, efficient access to destinations.”

What does this mean for the City of Santa Rosa?

This new metric aligns with the Santa Rosa General Plan 2035, Climate Action Plan and the Bicycle and Pedestrian Master Plan Update 2018 goals for smart and focused growth, accessibility, affordability, economic development and environmental sustainability. This shift to VMT furthers implementation of these policy documents in the following ways:

- Reducing the need to drive to destinations
- Removing key barriers to more sustainable growth
- Streamlining active transportation projects and transit
- Taking advantage of existing metric, that addresses several goals within these policy documents
- Reducing infrastructure capital and maintenance costs
- Improving health and wellness

What is the timeline for these changes?

July 1, 2020

Does my ability to engage in land use and transportation decisions change?

No. The process for weighing in on land use changes and transportation projects will remain the same. Citizens will still be able to provide comments, speak at public hearings, and contact elected representatives on new development and projects. The City Council still has the authority to make land use and transportation decisions.

How will the CEQA process change in Santa Rosa?

For certain types of transportation projects (e.g. bike and pedestrian projects) and certain types of development projects in Priority Development Areas (PDAs) and/or located in pre-screened areas on VMT screening maps for Santa Rosa, a transportation analysis under CEQA may not be required. This change to VMT only affects the transportation section under CEQA. Analysis of other CEQA subject areas such as biological and cultural resources, noise, and air quality remain the same.

How will this change impact the City's ability to ask developers for transportation investments?

Neighboring traffic and mobility are very important to the City. Developers will still be required to improve operations to the transportation network and to address neighborhood traffic.

Will the shift to VMT make it easier or harder to develop in my neighborhood?

Every development project is unique and will be evaluated according to its specific attributes and context. However, in general, development proposed in General Plan designated growth areas with good access to transit, bike and pedestrian facilities and a mix of uses (e.g. residential, office and retail) could achieve a streamlined CEQA process if General Plan amendments are not required for the project. Developments in places where it is hard to get around without a car will likely have to mitigate impacts of VMT.

Will the shift to VMT change the CEQA process?

The CEQA process will not change, but some projects currently not exempt from CEQA transportation analysis may be exempt from CEQA transportation analysis under VMT.

How will the shift to VMT impact new development projects?

New development projects that are required to analyze VMT will still be required to have a traffic impact analysis. Generally, new development proposals will be required to have project impacts measured using new City transportation guidelines based on the VMT metric. Mixed use development in General Plan growth areas, located near transit, may be more likely to meet VMT reduction thresholds more easily. Proposed developments not in growth areas and transit corridor may likely need to provide mitigation to reduce VMT impacts. Beyond the CEQA VMT metric, projects will continue to be required to analyze local intersection operations and other potential traffic operational impacts.

How will this change impact new transportation projects?

Transportation projects that inherently help reduce VMT such as bicycle and pedestrian improvements and transit may no longer have to go through a CEQA analysis for transportation environmental impacts. These projects may still be subject to city analysis on overall transportation system and operations impacts. Transportation projects that may increase VMT would generally be required to analyze VMT impacts and potentially mitigate those impacts.

When will the change to VMT happen? How will projects already in the pipeline be treated?

July 1, 2020

Any project environmental document released for public review prior to July 1, 2020 will not be subject to the new VMT CEQA requirements. Environmental documents released for public review after July 1, 2020 will need to comply with the VMT requirement.

Provisions for projects analyzed under existing adopted Environmental Impact Studies (EIRs) or existing approvals.

If a new development proposes to include Transportation Demand Management (TDM) measures into a development, how will the city enforce these measures?

The City will require annual monitoring of the approved TDM measure and reporting to Planning and Economic Development (PED) for approval. These requirements will be included in the permit/conditions of approval.

How will Cannabis be analyzed?

Proposed cannabis projects (manufacturing and cultivation uses) will be analyzed using Employment VMT per worker (employees commuting to workplace). Proposed cannabis dispensary uses will be analyzed using total VMT.

How will retail be analyzed?

For retail land uses, the OPR Technical Advisory recommends using the total VMT. Local serving retail uses include projects up to a combined total of 10,000 gross square feet.

How will this change impact housing?

Each development is unique and will be considered on an individual basis. Proposed very high-density housing developments that are consistent with the General Plan and support transit use and are locations in areas with high quality transit and amenities – may not have to analyze transportation impacts under CEQA, which may streamline the CEQA process.

How will this change impact affordable housing?

According to the Association of Bay Area Governments' report on Transit Oriented Development and Affordable Housing, lower-income households have lower car ownership rates than moderate-income households. Although each development is unique and will be individually analyzed, very high-density affordable housing developments tend to generate lower VMT than market-rate housing at comparable densities. The City of Santa Rosa's Draft VMT guidelines provides screening criteria for transportation review under CEQA for 100% affordable housing constructed near a major transit stop or high-quality transit corridor in PDAs.

Will this change impact the environment?

When LOS was used as the transportation impact screening criterion, greenfield development generated fewer transportation impacts under CEQA, in contrast, LOS impacts in infill locations were high. VMT is a more holistic approach to analyzing the transportation impacts of new development and generally aligns the type of development encouraged in the General Plan (infill near transit and services) with CEQA.

What are the impacts on business?

In general, businesses that are developing land uses at certain intensities that conform to the General Plan and that are in growth areas with high-quality transit may not have to analyze transportation impacts under CEQA, which may streamline the environmental review process.

How will this shift affect overall affordability?

The City's Draft VMT guidelines and shift to VMT is intended to streamline residential development overall, particularly affordable housing, infill housing, and homes in low-VMT areas. This streamlining should allow for greater supply and lower housing costs. Importantly, it will also lower transportation costs as new development is concentrated in areas with a variety of affordable transportation options. This is a key argument made the state in support of the VMT policy.

How will mitigation measures be determined?

Projects should be designed to address VMT reduction strategies. This can be a combination of providing access to active transportation modes and transit stations as an example. The project must also comply with current Bicycle and Pedestrian Master Plan infrastructure improvements and may include providing gaps in bicycle and pedestrians networks or traffic calming techniques.

Until the City has a means of quantitatively analyzing the effects of the VMT mitigation strategies, a qualitative approach may be used as allowed by CEQA guidelines.

When the Countywide calculator tool becomes available, the City may incorporate that into its quantitative analysis. If a development does not screen out and requires mitigation per CEQA, the City will take a qualitative approach to ensure adequate, applicable measures for the project are taking place. The traffic study should include an assessment of possible VMT reduction strategies to help a development meet their VMT goal.