



City of Santee VMT Analysis Guidelines

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List of Abbreviated Terms

| | |
|----------|---|
| ADT | average daily traffic |
| Caltrans | California Department of Transportation |
| CAPCOA | California Air Pollution Control Officers Association |
| CEQA | California Environmental Quality Act |
| City | City of Santee |
| CSTDM | California Statewide Travel Demand Model |
| EIR | environmental impact report |
| GHG | greenhouse gas |
| ITE | Institute of Transportation Engineers |
| IX | internal-to-external |
| LOS | level of service |
| MTS | Metropolitan Transit System |
| O-D | origin-destination |
| OPR | Governor's Office of Planning and Research |
| RTP | Regional Transportation Plan |
| SANDAG | San Diego Association of Governments |
| SB | Senate Bill |
| SCS | Sustainable Communities Strategy |
| TAZ | transportation analysis zone |
| TDM | transportation demand management |
| XI | external-to-internal |
| XX | external-to-external |

1. Introduction

1.1 Background

The City of Santee's (City) goal is to achieve a safe, efficient, accessible, and sustainable transportation system that meets the needs of all users. All transportation improvements and mitigation from proposed land development projects should be consistent with City-adopted plans and policies, as well as regional and state legislative and regulatory requirements.

City of Santee requires proposed land development and transportation projects to conduct a vehicle miles traveled (VMT) transportation impact analysis to assess potential impacts in compliance with the California Environmental Quality Act (CEQA VMT analysis). The City of Santee VMT Guidelines (VMT Guidelines) provide guidance for conducting VMT impact analysis.

1.2 CEQA Changes Related to Evaluating Transportation Impacts

On September 27, 2013, Governor Jerry Brown signed Senate Bill 743 (SB 743) into law which changes transportation impact analysis as part of CEQA compliance. A key element of this law is the elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The change was to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and the reduction of greenhouse gas emissions.

As a result, the Governor's Office of Planning and Research (OPR) updated the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. Based on feedback from the public, public agencies, and various organizations, OPR recommended that VMT be the primary metric for evaluating transportation impacts under CEQA. VMT refers to the amount and distance of automobile travel attributable to a project. Pursuant to CEQA Guidelines section 15064.3 (b) (1) *Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact*. Other relevant considerations may include the effects of the project on transit and non-motorized travel.

SB 743 does not prevent a city or county from continuing to analyze local mobility in terms of delay or LOS as part of other plans (e.g., general plans); studies; congestion management plans; or transportation improvement plans, but these metrics may no longer constitute the basis for CEQA transportation impacts as of July 1, 2020.

1.3 City General Plan Goals and Policies

The City's General Plan (adopted by City Council on October 25, 2017 via Resolution No. 114-2017) forms the foundation upon which all land use decisions in the City are based. The General Plan includes goals and policies that guide the City's growth, and many of these policies relate to and support the intent of SB 743. The City has also adopted specific greenhouse gas (GHG) reduction targets and has completed the

Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions that identifies policies and programs designed to meet those targets. Among other things, approaches for reducing GHGs in the transportation sector address vehicle efficiency and low-carbon fuels, as well as measures designed to reduce annual VMT. VMT-reduction measures include alternatives to passenger vehicle travel, land use policies that incentivize compact development, and incentives and disincentives aimed at changing individual behavior through transportation demand management (TDM) practices.

SB743-Related General Plan Policies

The General Plan goals and policies that are most consistent with the intent of SB 743 are those regarding planned improvements, including districts that contain a mix of uses, an accessible and integrated multi-modal network, and improvements that enhance connectivity to major transit stations¹. For example, promoting integrated transportation and land use decisions that enhance smart growth development, requiring sidewalks along all classified streets designated on the Circulation Plan, requiring larger new developments to provide connections to existing and proposed bicycle routes, and encouraging employers to offer incentives to their employees to promote carpooling and other alternative modes are among the existing City's policies that align with SB 743.

1.4 VMT Guidelines Purpose

The purpose of the VMT Analysis Guidelines is to provide thresholds of significance and analysis methodologies for analyzing the significance of transportation impacts under CEQA Guidelines sections 15064.3 and 15064.7. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant. The intent of the VMT Guidelines is to provide consistency in significance determinations to integrate environmental review with other environmental program planning and regulation.

The City may update the VMT Analysis Guidelines on an as-needed basis to reflect the state of practice methodologies and changes in CEQA requirements. As such, City staff will continually review the guidelines for applicability and coordinate with other jurisdictions and professionals to ensure the most recent guidance and best practices are being applied for project evaluation.

The VMT Analysis Guidelines are not binding on any decision maker and should not be substituted for the use of independent professional judgment and evaluation of evidence in the record. The City also reserves the right to request further, project-specific information in its evaluation that may not be identified or described in this document.

¹ Based on OPR Technical Advisory on evaluating transportation impacts in CEQA (2018), Major transit station is defined as 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.

1.5 SB743 Guidelines Objectives

The following objectives are intended to provide consistency between local, regional, and state policies in forecasting, describing, and analyzing the effects of land development on transportation and circulation for all transportation modes and users:

- Provide clear direction to applicants and consultants to better meet expectations, increase the efficiency of the review process, and minimize delays.
- Provide scoping procedures and recommendations for early coordination during the planning/discretionary phases of a land development project.
- Provide guidance in determining when, what type, and how to prepare VMT transportation impact analysis.
- Help achieve consistency, uniformity, and accuracy in the preparation of VMT transportation impact analysis.
- Provide consistency and equity in the identification of mitigation measures for the transportation impacts generated by land development.
- Assist City staff in developing objective recommendations and project conditions of approval as part of the land development discretionary review process.

1.6 City Review and Outside Agency Coordination

VMT analysis studies will be reviewed by appropriate City of Santee staff. If a project will affect another agency or jurisdiction, such as the California Department of Transportation (Caltrans), San Diego Association of Governments (SANDAG), San Diego Metropolitan Transit System (MTS), or neighboring cities, coordination with that agency or jurisdiction may be required and will be identified during the scoping process. City of Santee staff can provide guidance and contact information for other agencies or jurisdictions.

To assist the City with the review process, each applicant should submit a Scoping Agreement (**Appendix A**) before conducting a VMT analysis study.

2. CEQA Requirements for VMT Analysis

2.1 Overview

In December 2018, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, including the incorporation of SB 743 modifications. OPR also published an update to its Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) to assist professional planners, land use officials, and CEQA practitioners. The Technical Advisory provides recommendations on how to evaluate transportation impacts under SB743 that agencies and other entities may use at their discretion. The Technical Advisory recommends the use of VMT as the preferred CEQA transportation metric. SB743 includes the following two legislative intent statements:

1. Ensure that the environmental impacts of traffic, such as noise, air pollution, and safety concerns, continue to be properly addressed and mitigated through the California Environmental Quality Act.
2. More appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions.

VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. VMT does not directly measure traffic operations but instead is a measure of network use or efficiency, especially if expressed as a function of population or employment (e.g., VMT/capita). VMT tends to increase as land use density decreases and travel becomes more reliant on the use of the automobile due to the long distances between origins and destinations. VMT can also serve as a proxy for impacts related to energy use, air pollution emissions, GHG emissions, safety, and roadway maintenance. The relationship between VMT and energy or emissions is based on fuel consumption. The traditional use of VMT in environmental impact analysis is to estimate mobile air pollution emissions, GHGs, and energy consumption, and the type of VMT metric reported for these additional impact areas typically differs from the metrics used for the transportation analysis.

2.2 Metrics and Methodology for Calculating VMT

In general, transportation VMT analysis for CEQA should be conducted using the SANDAG Regional Travel Demand Model. The model outputs can be used to produce VMT/capita, VMT/employee, and Total VMT.

There may be circumstances under which other tools and techniques should be used to perform VMT analysis. There are unique land uses that are not appropriately modeled using the SANDAG model, such as uses that have the majority of their activity on the weekends (the SANDAG Model produces weekday results) or projects that generate less than 2,400² average daily trips (ADT). The applicant's traffic

² The ITE San Diego Task Force *Guidelines for Transportation Impact Studies in the San Diego Region*, May 2019 recommend that projects with an estimated ADT of 2,400 or more run SANDAG model to calculate VMT impact.

consultant should coordinate with City staff if a VMT estimate tool other than the SANDAG Model is proposed for use. Use of a tool other than the SANDAG Model should be discussed and approved by City staff in advance.

Appendix B includes additional tools that produce VMT forecasts or test VMT reduction strategies. Big data may also be used to validate model outputs.

Summary of Metrics by Project Type

The following summarizes the appropriate metric for various types of projects. Detailed definitions of the metrics follow.

- **Residential:** VMT/capita
- **General Employment:** Work Tour VMT/employee (office and other miscellaneous employment)
- **Industrial Employment:** Work Tour VMT/employee
- **Regional Retail, Regional Recreational, or Regional Public Facilities:** Change in total VMT (using the boundary method)
- **Mixed-Use:** Each project component is evaluated per the appropriate metric based on land use type (e.g., residential, employment, and retail)
- **Transportation Project:** Change in total VMT (using the boundary method)
- **Unique circumstances may require alternate metrics**

VMT per Capita

VMT/capita is established by summing up the total daily VMT generated by residents of a geographic area and dividing it by the population of that geographic area. Total daily VMT includes all trip tours made by residents: home-based and non-home-based trip tours (i.e., all VMT for a resident for the entire day regardless of trip purpose or origin/destination). To analyze the VMT/capita for a proposed project, the total daily VMT generated by project residents is divided by the project resident population.

SANDAG has a procedure to produce VMT/capita; however, the SANDAG procedure to produce this metric only includes VMT generated within the SANDAG region by residents of the SANDAG region. For example, if a resident of San Diego County shops in Riverside County, the trip from their home to the shopping would only be included up to the County boundary. If a project is expected to produce consistent travel outside of the SANDAG region, the VMT outside of the region should be included in the analysis. To account for VMT generated by residents of the SANDAG region traveling outside of the region, the SANDAG model data should be appended with the VMT that occurs by SANDAG region residents outside of the region. Steps necessary to include VMT from all trips that enter or exit the SANDAG region are explained in the ITE White Paper: *A Proposed Methodology for Adjustments to SANDAG Model-Produced VMT/Capita and VMT/Employee Due to VMT Generated Outside the San Diego Region*³.

³ ITE White Paper: A Proposed Methodology for Adjustments to SANDAG Model-Produced VMT/Capita and VMT/Employee Due to VMT Generated Outside the San Diego Region, <https://sandiegoite.org/tcm-task-force>, March 22, 2021

Work Tour VMT per Employee

Work Tour VMT/employee is established by summing the total daily work related VMT generated by resident employees⁴ of a geographic area divided by the number of employees of that geographic area. Total daily work related VMT includes all trip tours made by employees that are associated with work (, for example a worker’s commute trips and trips to/from lunch or other work related destinations). To analyze the Work Tour VMT/employee for a proposed project, the total daily work related VMT produced by the project’s employees is divided by the total number of employees. Note that “work tour VMT/employee” is simply called VMT/employee throughout this guidelines document.

The procedure developed by SANDAG to calculate VMT/employee by TAZ only accounts for VMT generated within the SANDAG region by employees who are also residents of the SANDAG region. Employees that live outside of the region and travel into the SANDAG region for work are not accounted for because of the nature of the procedures used in the SANDAG model. If a project is expected to generate employees that live outside of the SANDAG region, or if directed by City staff, VMT associated with employees that live outside of SANDAG region can be accounted for using a manual method and adding the VMT to the SANDAG model output. Steps necessary to include VMT from all trips that enter or exit the SANDAG region are explained in the ITE White Paper: *A Proposed Methodology for Adjustments to SANDAG Model-Produced VMT/Capita and VMT/Employee Due to VMT Generated Outside the San Diego Region*⁵.

Total VMT

Total VMT can be calculated by either of two methods – the Boundary Method or the Origin-Destination Method.

Boundary Method

Total daily VMT (Boundary Method) within a given area can be measured by multiplying the daily volume on every roadway segment by the length of every roadway segment within the area. This is called Boundary Method VMT. Examples of Total VMT (Boundary Method) are VMT within the SANDAG region, VMT within a defined planning area, or VMT within the market area to be served by the project.

This metric is used to analyze regional retail, service, recreational, regional public facilities, and transportation infrastructure projects.

Origin-Destination Method

Total daily VMT (Origin-Destination Method) within a given area can be calculated directly from model outputs by multiplying the origin-destination (O-D) trip matrix by the final assignment skims (O-D

⁴ Resident employees both live and work in the SANDAG region.

⁵ ITE White Paper: A Proposed Methodology for Adjustments to SANDAG Model-Produced VMT/Capita and VMT/Employee Due to VMT Generated Outside the San Diego Region, <https://sandiegoite.org/tcm-task-force>, March 22, 2021

Method VMT). The total VMT value should be appended to include VMT from all trips that enter or exit the SANDAG region.

This metric is used to evaluate a regional project if that project is expected to draw trips from outside the region (e.g., an amusement park). In addition, the origin-destination method for calculating VMT is commonly used with analysis of other CEQA resource areas such as air quality, energy, and GHG.

2.3 VMT Analysis for Land Use Projects

2.3.1 Screening Criteria for CEQA VMT Analysis

The requirements to prepare a detailed transportation VMT analysis apply to all discretionary land development projects that are not exempt from CEQA, except those that meet at least one of the transportation screening criteria described below. A project that meets at least one of the screening criteria below would be presumed to have a less than significant VMT impact due to project characteristics and/or location. If evidence suggest that the project might have a significant impact despite meeting the below screening criteria, City staff reserves the discretion to request VMT analysis.

Appendix C provides context and justification/rationale for the screening criteria

1. Projects Located in a Transit-Accessible Area

Projects located within a half-mile radius of an existing major transit stop or an existing stop along a high-quality transit corridor⁶ may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. A map of existing major transit stops and existing stops along high-quality transit corridors is provided in **Appendix D**.

The presumption of a less-than-significant impact near these transit stops may **not** be appropriate if the project:

- Has a Floor Area Ratio of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the City's Municipal Code.
- Is inconsistent with SANDAG's most recent Sustainable Communities Strategy or the land use growth assumption accommodated by the Land Use Element portion of the General Plan
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units
- Does not have basic walking and biking access to transit (e.g., sidewalks connecting to transit stops)

⁶ Major transit stop: 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. High quality transit corridor: a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute periods.

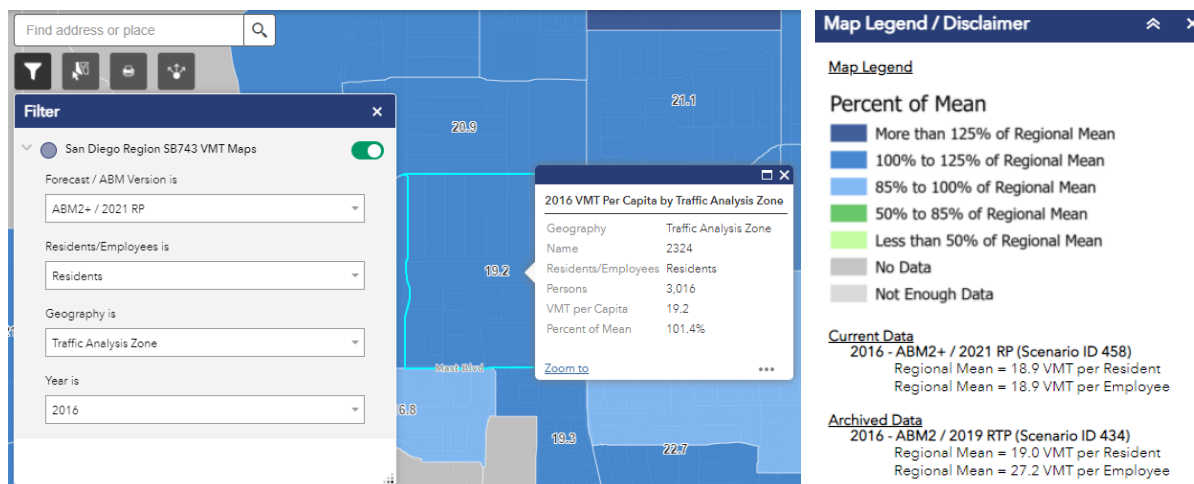
2. Small Projects

Projects generating 500 or fewer net new daily vehicle trips may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. Trips are based on the number of vehicle trips calculated using SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region or ITE trip generation rates with any alternative modes/location-based adjustments applied.

For information regarding the process for establishing the small project screening criteria see Appendix C.

3. Projects in a VMT-Efficient Area

A VMT-efficient area is any area within the City with an average VMT/capita or VMT/employee below the thresholds as compared to the baseline City/Regional VMT per capita for the TAZ that the project is located within. VMT efficient areas could be accessed through SANDAG's SB743 VMT Webmaps⁷. Note that the TAZ maps consider the minimum amount of data necessary as a population of 300 residents or 500 employees per TAZ. If minimum data is not available in the desired TAZ, census tract data may be used for comparison. Image below demonstrate a snapshot of the SB743 VMT Webmap that shows VMT/Capita for Residents on a TAZ level using the 2016 Baseline Model.



Residential projects located within a VMT-efficient area may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. A VMT-efficient area for residential projects is any area with an average VMT/capita 15% below the baseline City average for the TAZ that the project is located within.

General Employment projects located within a VMT-efficient area may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. A VMT-efficient area for employment projects (excluding industrial employment projects) is any area with an average VMT/employee 15% below the baseline regional average for the TAZ that the project is located within.

⁷ [San Diego Region SB743 VMT Maps \(arcgis.com\):](https://sandag.maps.arcgis.com/apps/webappviewer/index.html?id=bb8f938b625c40cea14c825835519a2b)

<https://sandag.maps.arcgis.com/apps/webappviewer/index.html?id=bb8f938b625c40cea14c825835519a2b>

Industrial Employment projects located within a VMT-efficient area may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. A VMT-efficient area for industrial employment projects is any area with an average VMT/employee at or below the baseline regional average for the TAZ that the project is located within.

Mixed-Use projects located within a VMT-efficient area for each of its land uses may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. Refer to the appropriate section for each land use included as a part of the mixed-use project to determine the definition of a VMT-efficient area for each land use.

4. Locally-Serving Retail Projects

Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel. Local serving retail projects less than 50,000 square feet that are expected to draw approximately 75% of customers from the local area (roughly 3-miles) are presumed to have a less than significant impact absent substantial evidence to the contrary. Retail projects that are between 50,000 square feet and 125,000 square feet with similar customer attraction (approximately 75% from local area) may also be presumed locally-serving; however, the city may require the applicant to provide a market analysis as evidence that the project is locally serving. Retail projects that are more than 125,000 square foot are required to conducted a VMT analysis unless the applicant provides market surveys to demonstrate that at least 75% of customers are attracted from the local population.

5. Locally-Serving Public Facilities

Public facilities that serve the surrounding community or public facilities that are passive use may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. The following are considered locally serving public facilities:

- Transit centers
- Public schools
- Libraries
- Post offices
- Park-and-ride lots
- Police and fire facilities
- Parks and trailheads
- Government offices
- Passive public uses, including communication and utility buildings, water sanitation, and waste management
- Other public uses as shown in **Appendix E** or determined by City staff

6. Redevelopment Projects with Lower Total VMT

A redevelopment project may be presumed to have a less-than-significant impact absent substantial evidence to the contrary if the proposed project's total project VMT is less than the existing land use's total VMT and the CEQA action includes closing the existing land use.

7. Infill affordable housing

California's Public Resources Code (PRC) §21061.3 defines infill as:

"Infill site" means a site in an urbanized area that meets either of the following criteria:

(a) The site has not been previously developed for urban uses and both of the following apply:

(1) The site is immediately adjacent to parcels that are developed with qualified urban uses, or at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses, and the remaining 25 percent of the site adjoins parcels that have previously been developed for qualified urban uses.

(2) No parcel within the site has been created within the past 10 years unless the parcel was created as a result of the plan of a redevelopment agency.

(b) The site has been previously developed for qualified urban uses.

Based on the ITE 11th Edition of the Trip Generation Manual, the affordable housing trip generation rate is approximately 30% lower than the multi-family (low-rise) rate. Adding affordable housing to infill locations generally improves jobs-housing balance, in turn, shortening commutes and reducing VMT. This suggests that it is possible to presume a blended affordable and market-rate residential project as having less than significant VMT impact.

City of Santee presumes deed-restricted affordable housing projects that meet the following conditions meet the City's screening criteria and would not require a VMT analysis.

- Is an infill project (note that most of the City of Santee is presumed to be an infill location);
- Consists of a minimum of 52% affordable housing;
- Is within ½ mile radius of a transit stop or station; and
- Project-provided parking does not exceed parking required by the City's Municipal Code.

2.3.2 VMT Thresholds of Significance

Projects that DO NOT meet the above screening criteria must include a detailed evaluation of the VMT produced by the project. The significant thresholds and specific VMT metrics used to measure VMT are described by land use type below.

- **Residential:** 15% below the City average VMT/capita
- **General Employment:** 15% below the regional average VMT/employee
- **Industrial Employment:** At or below regional average VMT/employee
- **Mixed-Use:** Each project component is evaluated per the appropriate metric based on land use type (e.g., residential, employment, and retail)
- **Regional Retail, Regional Recreational, or Regional Public Facilities:** A net increase in total regional VMT using the boundary method

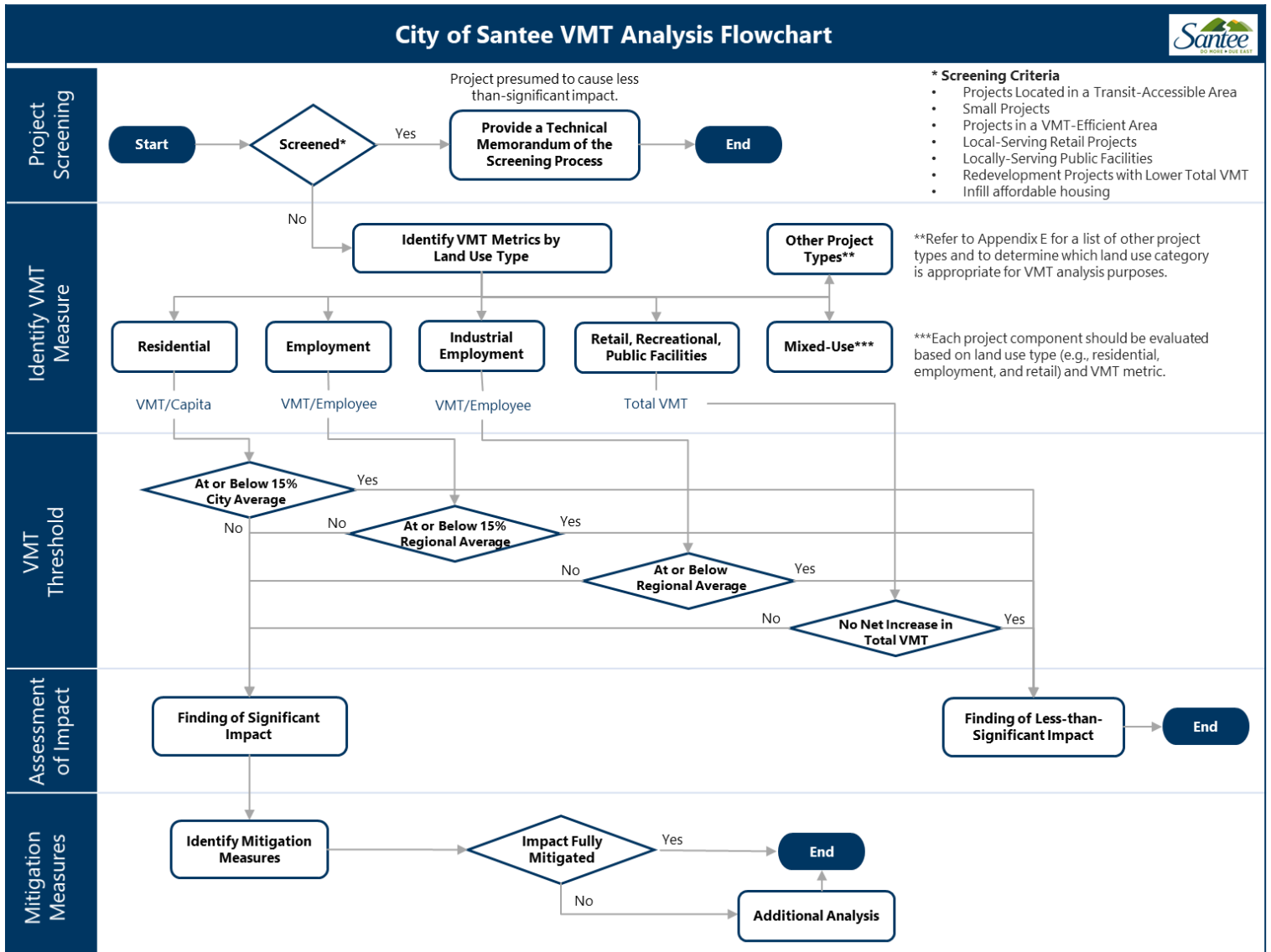
Appendix E provides land use designations to the primary land use categories above as well as unique project types and which land use category is appropriate for VMT analysis purposes.

Specific Plans or General Plan Amendments: The land use plan should be compared to the region overall. Comparison to the region is appropriate because large land use plans can have an effect on regional VMT (akin to how a regional retail project affects regional VMT). The significance thresholds described above apply to specific plans or General Plan Amendments. In addition, plan buildout/cumulative analysis is needed.

2.3.3 VMT Analysis Procedures

Projects that are not screened out must provide a detailed evaluation of the VMT produced by the project. In addition, **Figure 1** displays how to conduct transportation VMT analysis by project type.

Figure 1: VMT Analysis Process



Residential Projects

For projects that generate fewer than 2,400 daily unadjusted⁸ driveway trips: Identify the location of the project on the City’s VMT/capita map. The project’s VMT/capita will be considered the same as the VMT/capita of the TAZ as shown on the VMT/capita map. Compare the project’s VMT/capita to the threshold to determine if the impact is significant, or, if desired or requested by the City, input the project into the SANDAG Regional Travel Demand Model to determine the project’s VMT/capita.

⁸ Unadjusted trips is defined as total number of generated trips before any credits are taken for internal capture, alternative modes, or other credits.

For projects that generate 2,400 or greater daily unadjusted driveway trips: Larger projects will typically be analyzed using a custom model run by inputting the project into the SANDAG Regional Travel Demand Model. To perform the analysis, all project land uses should be inputted, and the VMT/capita should be determined using the same method/scripts that SANDAG utilizes to calculate the VMT/capita threshold. Note that there may be some circumstances where the use of screening maps or other sketch modeling tools are appropriate for larger projects, especially if the project has the same characteristics of the land uses that are already contained in the TAZ where the project is located or if the project is unique in nature and project specific travel behavior information is available.

Employment Projects (Non-Industrial and Industrial)

For projects that generate fewer than 2,400 daily unadjusted driveway trips: Identify the location of the project on the City's VMT/employee map. The project's VMT/employee will be considered the same as the VMT/capita of the TAZ as shown on the VMT/employee map. Compare the project's VMT/employee to the threshold to determine if the impact is significant, or, if desired or requested by the City, input the project into the SANDAG Regional Travel Demand Model to determine the project's VMT/employee.

For projects that generate 2,400 or greater daily unadjusted driveway trips: Larger projects will typically be analyzed using a custom model run by inputting the project into the SANDAG Regional Travel Demand Model. To perform the analysis, all project land uses should be inputted, and the VMT/employee should be determined using the same method/scripts that SANDAG utilizes to calculate the VMT/employee threshold. There may be some circumstances where the use of screening maps or other sketch modeling tools are appropriate for larger projects, especially if the project has the same characteristics of the land uses that are already contained in the TAZ where the project is located or if the project is unique in nature and project specific travel behavior information is available.

Regional Retail Projects

Calculate the change to area VMT using the SANDAG Travel Demand Model (or other appropriate sketch models as coordinated with City Staff). To calculate the change in area VMT, the regional retail component of the project should be inputted into the travel demand model. The "with project regional retail" area VMT produced by the model run is compared to the "no project" area VMT.

If specific data exists about the travel behavior for the project such as big data⁹ or a detailed market study, this information may be used to conduct the VMT analysis because it typically provides more specificity than the SANDAG Travel Demand Model.

Mixed-Use Projects

Evaluate each project component per the appropriate metric based on land use type (e.g., residential, employment, and retail) as described above.

⁹ Big data is referred to the use of crowdsourced data such as GPS or Location-Based data collected from smartphones, connected vehicles, or similar data sources to estimate number of trips, trip length, duration, etc.

Other Projects

Input the project into the SANDAG Regional Travel Demand Model for SANDAG to provide the project's applicable VMT metric. To perform the analysis, all project land uses should be inputted, and the VMT metric that is appropriate based on the land use type should be determined using the methodology described in **Section 2.2**.

VMT Reductions

If the project includes transportation demand management (TDM) measures, the reduction in VMT due to each measure should be calculated and can be applied to the project VMT analysis. See **Section 2.5** for resources for determining the reduction in VMT due to TDM measures.

The VMT reductions associated with project feature TDM should be applied to the appropriate metrics based on the project land uses. If the project does not include any TDM, then no reduction is taken.

The resulting VMT values should be compared to the appropriate threshold (described previously under **VMT Thresholds of Significance**) to determine whether the project results in a significant CEQA transportation impact due to VMT.

2.4 VMT Analysis for Transportation Projects

Projects that result in an increase in additional motor vehicle capacity (such as constructing a new roadway or adding more vehicle travel lanes to an existing roadway) have the potential to increase vehicle travel, referred to as "induced vehicle travel."

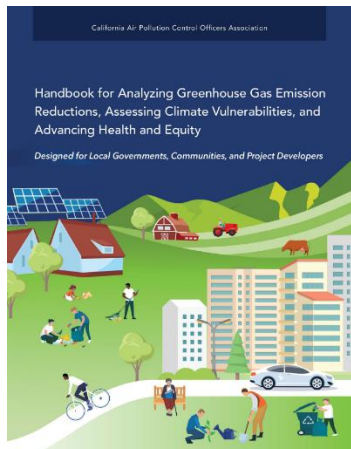
Appendix F contains a list of transportation projects that, absent substantial evidence to the contrary, do not require an induced travel/VMT analysis since they typically do not cause substantial or measurable increases in VMT.

For all other projects, a VMT analysis must be done. To calculate the change in area VMT (boundary method), the project should be inputted into the travel demand model. The "with project" area VMT produced by the model run is compared to the "no project" area VMT. A net increase in area VMT indicates that the project has a significant impact.

2.5 VMT Reduction and Mitigation Measures

To mitigate VMT impacts, the project applicant must reduce VMT, which can be done by either reducing the number of automobile trips generated by the project or by reducing the distance that people drive. The following strategies are available to achieve this:

1. Modify the project's built-environment characteristics to reduce VMT generated by the project.
2. Implement TDM measures to reduce VMT generated by the project.



Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity



SANDAG Mobility Management Guidebook, which includes recommendations of VMT-reducing measures.

Strategies that reduce single-occupant automobile trips or reduce travel distances are called TDM strategies. There are several resources for determining the reduction in VMT due to TDM measures, such as the California Air Pollution Control Officers Association ("CAPCOA") *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (2021) (GHG Reduction Handbook) and the SANDAG *Mobility Management Guidebook/VMT Reduction Calculator Tool*. Both resources include equations that address the diminishing value or decreased effectiveness of TDM measures when those measures are used in combination. The equations below should be used by applicants to accurately quantify the effectiveness of a proposed TDM program.

Step 1: Calculate VMT Reduction under each sub-sector (A,B,C, ...):

$$P_A = 1 - [(1 - S_1) * (1 - S_2) * (1 - S_3) * ...]$$

P_A Combined VMT reduction for sub-sector A

$S_{1,2,3,...}$ VMT reduction from each individual strategy in sub-sector A

Step 2: Calculate combined effectiveness of all sub-sectors:

$$P_{TOTAL} = 1 - [(1 - P_A) * (1 - P_B) * (1 - P_C) * ...]$$

$P_{A,B,C,...}$ Combined VMT reduction for each sub-sector from Step 1

For a TDM Program consisting of many measures, care must be taken to verify that the calculated VMT reductions account for maximums allowed within each sub-sector and combined effectiveness across multiple sub-sectors. In addition, Projects that are in urban areas have a higher limit of effectiveness (i.e., they can result in higher VMT reductions) than those in suburban areas. Therefore, TDM measures must be selected based on the project's size, location, and land uses for varying levels of implementation.

Note that the GHG Reduction Handbook also identifies measures appropriate at the project/site level and plan/community level to be combined separately. It is not appropriate to combine measures from the two categories together. The project/site level measures are appropriate for use for most applicants. If a plan/community level measure is desired, the applicant/consultant should coordinate with City staff.

Special attention should also be given to ensuring that measures are not double-counted through the transportation analysis process. For example, if a project identifies telecommuting as a reduction strategy, care should be taken to identify the level of telecommuting that has already been assumed as part of the travel demand model through coordination with SANDAG modeling staff or review of SANDAG model documentation available on SANDAG's website.

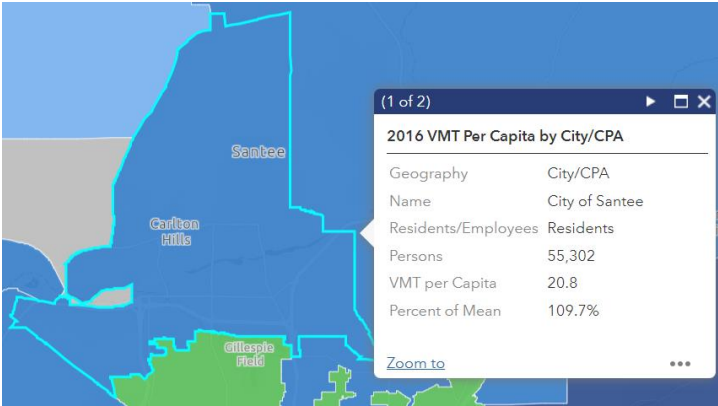
An example VMT reduction calculation is provided showing quantified TDM measures for a sample mixed-use development project in **Appendix G**.

2.6 Cumulative VMT Impacts

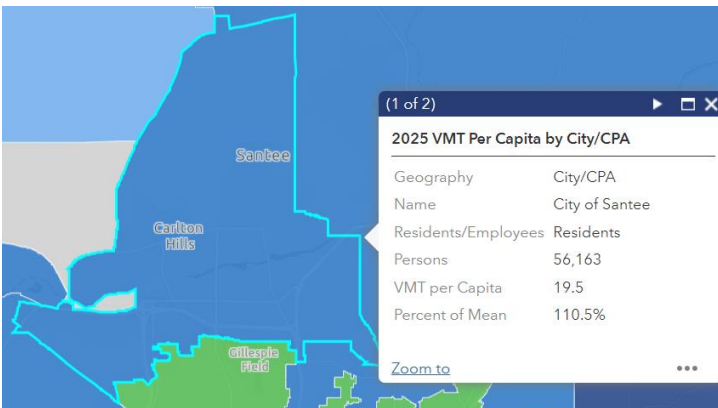
Because VMT is a composite metric that will continue to be generated over time, a key consideration for cumulative scenarios is whether the rate of VMT generation gets better or worse in the long term. If the rate is trending down over time consistent with expectations for air pollutants and GHGs, then the project-level analysis may suffice. However, the trend direction must be supported using substantial evidence. Review of the SANDAG Regional Travel Model reveals that VMT/capita and VMT/employee are anticipated to trend down over time. **Figure 2** demonstrates VMT/capita and VMT/employee trends based on the latest SANDAG Regional Travel Model (ABM2+, 2021 Regional Plan) and shows that both metrics trend down over time. Therefore; if a project is consistent with the assumptions in the SANDAG 2021 Regional Plan, the existing conditions project-level analysis is sufficient to determine cumulative impacts.

Figure 2: Santee VMT/Capita and VMT/Employee Trends Based on SANDAG Regional Travel Model (ABM2+, Regional Plan 2021)

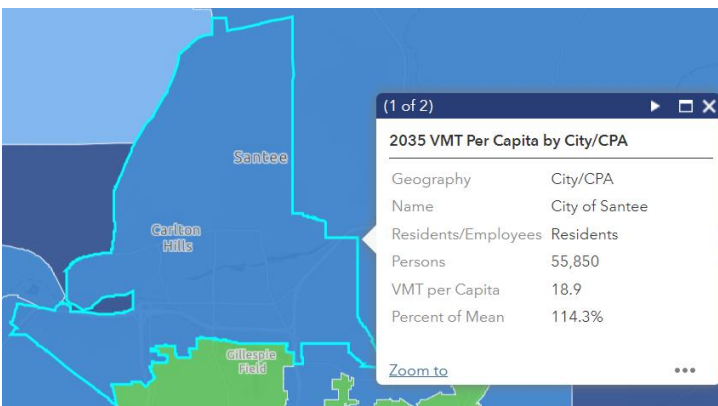
Residents



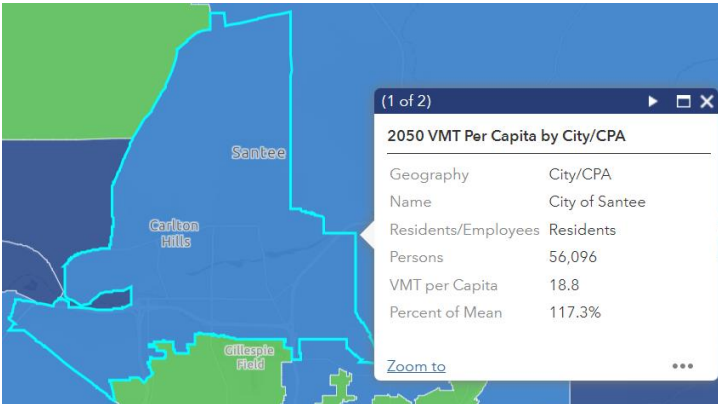
Year 2016
 VMT/Capita = 20.8



Year 2025
 VMT/Capita = 19.5



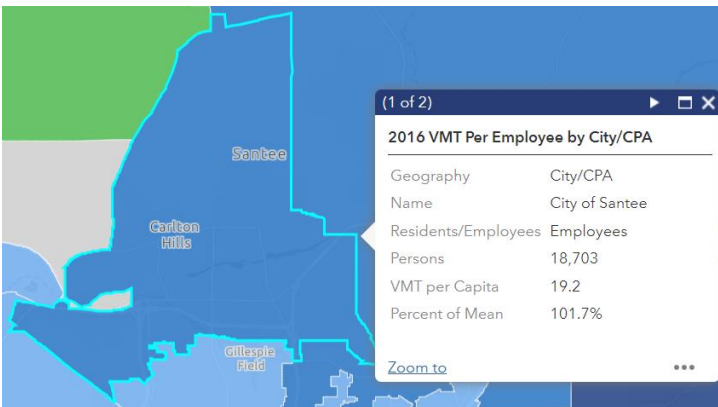
Year 2035
 VMT/Capita = 18.9



Year 2050

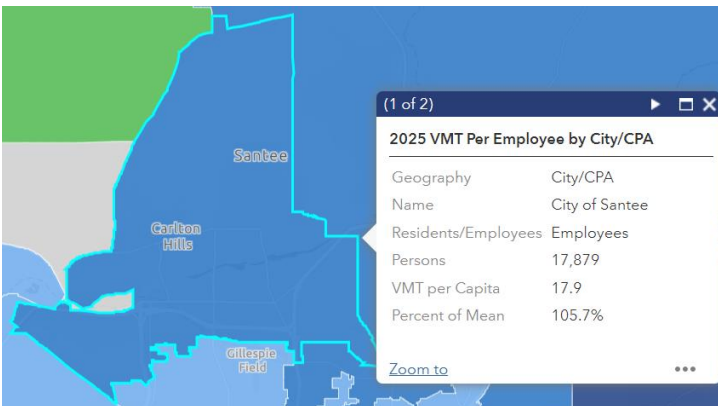
VMT/Capita = 18.8

Employees



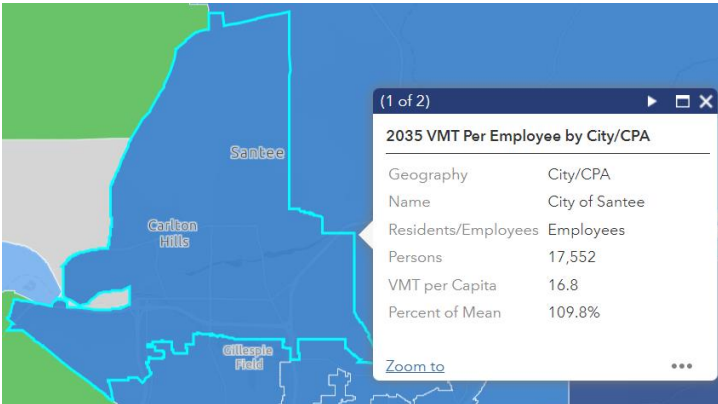
Year 2016

VMT/Employee = 19.2



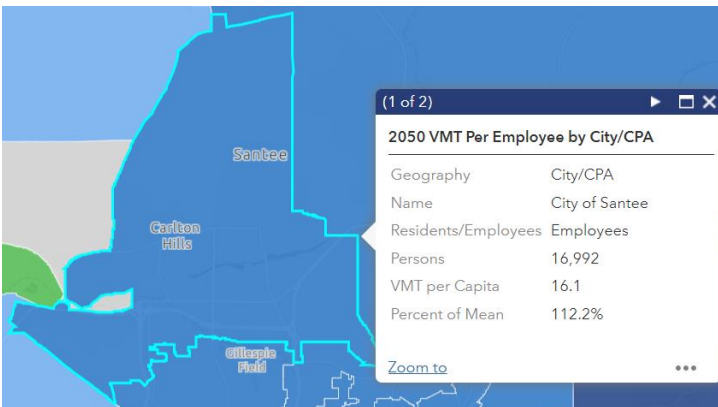
Year 2025

VMT/Employee = 17.9



Year 2035

VMT/Employee = 16.8



Year 2050

VMT/Employee = 16.1

If a project is not consistent with the assumptions in the SANDAG 2021 Regional Plan, a cumulative analysis may be necessary. A project effect on VMT under cumulative conditions would be considered significant if the cumulative VMT/capita or VMT/employee under the future year "plus project" condition exceeds the base year thresholds identified under section 2.3.2.

Please note that the cumulative "no project" condition shall reflect the adopted Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS); as such, if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant.

Appendix A: CEQA Transportation Analysis Screening Form

CEQA Transportation Analysis Screening

The Project Information Form (PIF) is to be completed by the applicant. The PIF is subject to change as new project information arises.

General Project Information and Description

Owner/Applicant Information

| |
|----------------------|
| Name: |
| Address: |
| Phone Number: |
| Email: |

Project Information

| | |
|------------------------------|----------------------------|
| Project Name: | |
| Project Address: | |
| APN: | |
| Land Use Designation: | Zoning Designation: |

CEQA Transportation Analysis Screening

To determine if your project is screened from VMT analysis, review the Project Type Screening and the Project Location Screening tables below. If no "Yes" is checked for any project type or land use applicable to your project, the project is not screened out and must complete VMT analysis in accordance with the analysis requirements outline in the City of Santee SB 743 *Guidelines*. Trip generation should be supported by a memo prepared by a traffic engineer.

Project Type Screening

| | Screened Out | Not Screened Out |
|---|---|---|
| | Yes | No |
| <p>1. Select the Screening Criteria that applies to your project</p> <p>2. Answer the questions for each screening criteria that applies to your project (if "Yes" is indicated in any land use category below, then that land use (or a portion of the land use) is screened from CEQA Transportation Analysis)</p> <p><i>Note: All responses must be documented and supported by substantial evidence.</i></p> | | |
| <p><input type="checkbox"/> 1. Project located in a transit accessible area</p> <p>a. Is the project in a transit priority area or within ½ mile of a stop along a high-quality transit corridor, and has the following project characteristics?</p> <p>i. Has a Floor Area Ratio (FAR) of more than 0.75</p> <p>ii. Includes no more than the minimum parking for use by residents, customers, or employees of the project than required by the jurisdiction</p> <p>iii. Is consistent with the City of Santee General Plan</p> <p>iv. Does not replace affordable residential units with moderate- or high-income residential units.</p> <p>v. Have basic walking and biking access to transit</p> | <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> | <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> |
| <p><input type="checkbox"/> 2. Small Project</p> <p>a. The project generates 500 or fewer net new daily vehicle trips</p> | <p><input type="checkbox"/></p> | <p><input type="checkbox"/></p> |

CEQA Transportation Analysis Screening

- 3. Projects in VMT-Efficient area (Provide SANDAG screening map showing project location)**
 - a. Residential Projects: Is the project located in a VMT-efficient area (15% or more below the baseline citywide average) using the SANDAG screening maps for VMT/Capita?
 - b. Employment Projects: Is the project located in a VMT-efficient area (15% or more below the baseline citywide average) using the SANDAG screening maps for VMT/Employee?
 - c. Industrial Projects: Is the project located in a VMT-efficient area (at or below the baseline citywide average) using the SANDAG screening maps for VMT/Employee?
 - d. Mixed-use Projects: refer to the appropriate section for each land-use included as part of the mixed-use project
- 4. Locally Serving Retail Projects**
 - a. Is the project less than 125 ksf and serving the local community?The City may request a market capture study that identifies local market capture to the City’s satisfaction. (for Retail Projects above 50 ksf, market studies may be required to demonstrate that at least 75% of customers are local customers)
- 5. Locally Serving Public Facility or Community Purpose Facility**
 - a. Is the project a public facility or Community Purpose Facility that serves the local community? (see section 2.3 of VMT analysis guidelines for a list of public facilities)
- 6. Redevelopment Project**
 - a. Is the proposed project’s total project VMT less than the existing land use’s total VMT? And the CEQA action includes closing the existing land use?
- 7. Infill affordable housing**
 - a. Is the proposed project a deed restricted affordable housing project that meet the following criteria?
 - i. Is an infill project;
 - ii. Consists of a minimum of 52% affordable housing;
 - iii. Is within ½ mile radius of a transit stop or station; and
 - iv. Project provided parking does not exceed parking required by the City of Santee

Appendix B: Additional VMT Analysis Tools

Other VMT Analysis Tools

California Statewide Travel Demand Model (CSTDm)

The CSTDm was developed by Caltrans and produces passenger travel demand forecasts. Details about the model may be found at the following website.

- http://www.dot.ca.gov/hq/tpp/offices/omsp/statewide_modeling/cstdm.html

In addition, Caltrans has produced VMT output data of the CSTDm by traffic analysis zone (TAZ) for purposes of SB 743 implementation, and that data may be accessed at the following website.

- <http://www.dot.ca.gov/hq/tpp/offices/omsp/SB743.html>

As a statewide model, the level of detail for local project applications may not be sufficient to produce reasonable results, as the model was not validated at a local scale. The TAZs are large; therefore, the resulting VMT outputs would have limited sensitivity to small scale land use projects and the influences of land use context.

California Household Travel Survey (CHTS) Data

The CHTS is distributed by Caltrans to gather data needed to update the statewide database of household travel behavior. This database is used to model and forecast travel throughout the State of California. The last CHTS started in 2010 and ended in 2013.

CHTS data provides residential trip length by trip purpose. This data can be used to determine the home-based VMT/Resident. In order to complete this calculation, the average trip length in the project's census tract is multiplied by the number of expected residents.

As CHTS data is inherently associated with residences, a VMT/Employee or VMT/Service Population can't be calculated using this data source.

Data Sources Summary

Table 1 below identifies which of the VMT data sources produce data for each VMT efficiency metric.

Table 1: VMT Data Source Features at a Glance

| Features | CSTDM | SANDAG Travel Model (Current SB743 Information)* | CHTS |
|---|----------|--|--|
| Accounts for External Trips | X | - | X |
| Can Calculate VMT/Service Population | X | X | - |
| Can Calculate VMT/Resident | X | X | X <i>(Home-based trips ONLY)</i> |
| Can Calculate VMT/Employee | X | X | |
| Can be updated manually with new data | - | - | X |

Notes: *The SANDAG model does have external trips; however, the step in the modeling process that was used to develop the current VMT/Resident and Employee VMT/Employee results was not able to utilize the external trips portion of the model. Additional modeling or an alternate process would be needed to incorporate the external trips.

Source: Fehr & Peers, 2018

Big Data

Big data is defined as data gathered from cell phones and other devices that is used to reveal patterns, trends, and associations of travel. It can be useful in validating data source information, including trip lengths and origins and destinations (O/D). Data provided by companies such as StreetLight Data, Teralytics, and INRIX can be used to determine the validity of results produced by the Caltrans or SANDAG travel models or CHTS data analysis. It is recommended that big data is used in combination with a VMT data source. Big data can provide the existing VMT conditions; however, it should not on its own be used to establish a VMT threshold because it is not a tool that can be used to estimate a project's VMT or effect on VMT. As described previously, the threshold and project analysis must be established using the same VMT tool and methodology.

For the City of Santee, this validation process could determine that due to the unique nature of City communities, using the SANDAG model without modification for these unique features would create unrealistic VMT results. For example, big data can be used to help understand commute patterns from Riverside County, Orange County, and Imperial County.

Appendix C: Screening Criteria and Threshold Evidence

Screening Criteria and Threshold Evidence

This appendix provides context and justification/rationale for the screening criteria and thresholds for performing transportation VMT CEQA impact analysis.

Screening Criteria

Development projects are presumed to have less-than-significant impacts to the transportation system, and therefore would not be required to conduct a VMT analysis, if any of the following criteria are satisfied.

1. Projects Located in a Transit-Accessible Area

Projects located within a half mile of an existing major transit stop or an existing stop along a high-quality transit corridor¹⁰ may be presumed to have a less-than-significant impact. The presumption of a less-than-significant impact near these transit stops may not be appropriate if the project:

- Has a Floor Area Ratio of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the City
- Is inconsistent with SANDAG's most recent Sustainable Communities Strategy or the land use growth assumption accommodated by the Land Use Element portion of the General Plan
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units
- Does not have basic walking and biking access to transit (e.g., sidewalks connecting to transit stops)

Evidence – Projects located within a half mile of an existing major transit stop or a half mile from stops along high-quality transit corridors can help reduce VMT by increasing capacity for transit-supportive residential and/or employment densities in low VMT areas. The increased density that is associated with projects in a transit-accessible area can increase transit ridership and therefore justify enhanced transit service, which would in turn increase the number of destinations that are accessible by transit and further increase transit ridership and decrease VMT.

¹⁰ "Major transit stop" means a site containing an existing rail or bus rapid 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. (See Public Resources Code § 21064.3.) "High-quality transit corridor" means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. (See Public Resources Code § 21155(b).)

Additionally, CEQA Guidelines section 15064.3(b) states, "Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact."

2. Small Projects

Projects generating 500 or fewer net new daily vehicle trips may be presumed to have a less-than-significant impact absent substantial evidence to the contrary.

Evidence – According to findings from the *CEQA & Climate Change white paper (Evaluating and addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act , CAPCOA, January 2008)*, small developments that generate less than 900 MTCO₂ per year are considered to have de minimis impact on the GHG Emissions.

In April 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published updated project screening levels and determined that projects estimated to generate less than 1,100 MT MTCO₂ per year would not result in a significant, cumulative impact (SMAQMD 2020). This threshold was developed to demonstrate compliance with the statewide reduction targets in 2030 and the threshold was determined by SMAQMD to capture 98 percent of total GHG emissions.

The CAPCOA screening level threshold of 900 MT CO₂e is more conservative than the SMAQMD screening level; therefore, the CAPCOA threshold is in line with the post-2020 reduction goals established by SB 32. Thus, for the purposes of this analysis, the 900 MTCO₂ per year screening level was used in accordance with CAPCOA guidance. The screening level does not indicate impact significance; rather, it is intended to be used to screen out smaller projects that do not generate substantial amounts of GHG emissions and allows regulatory and discretionary actions to focus on the more significant sources of GHG emissions. Projects that emit less than 900 MTCO₂ per year would not likely be considered cumulatively considerable and would not interfere with the ability of the state to achieve its GHG reduction targets.

Based on the 2019 Sustainable Santee Plan, approximately 60% of all GHG emissions are associated with the transportation sector. It is therefore assumed that GHG emissions from the transportation sector associated to a development to be assumed as de minimis is estimated at approximately 540 MTCO₂ per year. Based on outputs from the California Emissions Estimator Model (CalEEMod), it is estimated that a project generating approximately 1,000 trips per day results in nearly 540 MTCO₂ per year related to transportation sector (see table for details). To be more conservative, the City of Santee has selected 500 daily trips as the threshold to screen out a project as a small development.

| Trips | Average Trip Length (mile) City of Santee ABM 2+ | GHG Grams (g) per year | GHG Metric Tons (MT) per year |
|--------------|---|---------------------------|----------------------------------|
| 100 | 5.65 | 54,073,500 | 54.07 |
| 200 | 5.65 | 108,147,000 | 108.15 |
| 300 | 5.65 | 162,220,500 | 162.22 |
| 400 | 5.65 | 216,294,000 | 216.29 |
| 500 | 5.65 | 270,367,500 | 270.37 |
| 600 | 5.65 | 324,441,000 | 324.44 |
| 700 | 5.65 | 378,514,500 | 378.51 |
| 800 | 5.65 | 432,588,000 | 432.59 |
| 900 | 5.65 | 486,661,500 | 486.66 |
| 1,000 | 5.65 | 540,735,000 | 540.74 |
| 1,100 | 5.65 | 594,808,500 | 594.81 |
| 1,200 | 5.65 | 648,882,000 | 648.88 |

1. Average Trip Length (ATL) for the City of Santee per SANDAG Regional Travel Model 2021 ABM 2+ Regional Travel Model
2. GHG Grams per year = [Trips x ATL x 260 days x 355 CO₂ g/VMT] + [Trips x 260 days x 74 CO₂ g/trip]
3. Per California Emissions Estimator Model (CalEEMod) version 2020.4.0, May 2021:
 Source: San Diego County 2019 Annual CO₂ Running ≈ 355 g/VMT for Light Duty Passenger (LDA) travel
 Source: San Diego County 2019 Annual CO₂ Starting ≈ 74 g/trip for Light Duty Passenger (LDA) starting
4. 900 MTCO₂/year is assumed as de minimis amount of GHG produced by small developments (CEQA & Climate Change - Evaluating and addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act (CAPCOA, January 2008)
5. Based on the Sustainable Santee Plan (December 2019) nearly 60% of the GHG Emissions are generated by the on-road transportation sector. The de minimis amount of GHG from the on-road transportation sector is calculated as: [900 MTCO₂/year x 60%] = 540 MTCO₂/year, the amount is estimated to be generated by approximately 1,000 daily trips.

3. Projects in a VMT-Efficient Area

If a residential development is located in an area where VMT/capita is 15% or more below the city average, or a general employment development is located in an area where VMT/employee is 15% or more below the regional average, or an industrial employment development is located in an area where the VMT per employee is at or below the regional average, the project is presumed to result in a less-than-significant CEQA impact.

Evidence – This presumption is consistent with the Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018) (OPR Technical Advisory), which provides that, “residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Maps created with data from a travel survey or travel demand model can illustrate areas that are currently below threshold. Because new development in such locations would likely result in a similar level of VMT, such maps can be used to screen out residential and office projects from needing to prepare a detailed VMT analysis.”

Evidence – Purely industrial uses are desired to be located in less VMT-efficient, higher-VMT areas in the City of Santee. Placing these land intensive uses in areas with less efficient VMT allows land in efficient VMT areas to be more effectively utilized as high density residential and commercial uses. This threshold



will encourage industrial uses to develop in locations appropriate for industrial and agricultural uses, further reducing other potential impacts to sensitive land uses, leaving infill and more VMT-efficient areas available for more dense uses.

Specifically, the OPR Technical Advisory states, “Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends the quantified thresholds described above for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types.”

4. Locally-Serving Retail Projects

Locally serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel. The 125,000 square foot of total gross floor area threshold for local serving retail is consistent with the upper square footage threshold of the Neighborhood Shopping Center land use from the SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region. The Neighborhood Shopping Center land use is by definition locally serving.

Evidence – The OPR Technical Advisory states, “Because new retail development typically redistributes shopping trips rather than creating new trips,¹¹ estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts.” Local serving retail generally shortens trips as longer trips from regional retail are redistributed to new local retail.

5. Locally-Serving Public Facilities

Community-purpose facilities serve the community and either produce very low VMT or divert existing trips from established local facilities. A replacement/remodel of an existing local serving public facility with no net increase in VMT would not require a VMT analysis for CEQA.

Evidence – Similar to locally serving retail, locally serving community-purpose facilities would redistribute trips and would not create new trips.¹² Thus, similar to locally serving retail, trips are generally shortened as longer trips from a regional facility are redistributed to the locally serving public facility.

6. Redevelopment Projects with Lower Total VMT

A redevelopment project that demonstrates that the total project VMT is less than the existing land use’s total VMT is not required to complete a VMT analysis.

¹¹ Lovejoy, et al., Measuring the Impacts of Local Land-Use Policies on Vehicle Miles of Travel: The Case of the First Big-Box Store in Davis, California, *Journal of Transport and Land Use*, 2013.

¹² Lovejoy, et al., Measuring the Impacts of Local Land-Use Policies on Vehicle Miles of Travel: The Case of the First Big-Box Store in Davis, California, *Journal of Transport and Land Use*, 2013.

Evidence – Consistent with the OPR Technical Advisory, “[w]here a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact.”

If a residential or office project leads to a net increase in VMT, then the project’s VMT/capita (residential) or VMT/employee (office) should be compared to thresholds recommended. Per capita and per employee VMT are efficiency metrics, and, as such, apply only to the proposed project without regard to the VMT generated by the previously existing land use.

“If the project leads to a net increase in provision of locally-serving retail, transportation impacts from the retail portion of the development should be presumed to be less than significant. If the project consists of regionally-serving retail, and increases overall VMT compared to existing uses, then the project would lead to a significant transportation impact.” – OPR Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018).

7. Infill affordable housing

Residents of affordable residential projects typically generate less VMT than residents in market rate residential projects. This pattern is particularly evident in affordable residential projects near transit¹³. In recognition of this effect, and in accordance with the OPR Technical Advisory, deed-restricted affordable housing projects that meet the following conditions meet the City’s screening criteria and would not require a VMT analysis.

- Is an infill project;
- Consists 52% affordable housing or more;
- Is within ½ mile radius of a transit stop or station; and
- Project-provided parking does not exceed parking required by the City of Santee Municipal Code.

The City has discretion to review the project’s characteristics to confirm that the screening criteria is appropriate and may disallow use of screening criteria if the project characteristics do not meet the screening criteria definitions.

Evidence – Affordable residential projects generate fewer trips than market rate residential projects¹⁴. This research also supports the assumption that the rate of vehicle ownership is expected to be less for people that qualify for affordable housing.

¹³ Newmark and Hass, “Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy,” The California Housing Partnership, 2015.

¹⁴ Newmark and Hass, “Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy,” The California Housing Partnership (2015).

Additionally, the OPR Technical Advisory states, "Adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT."

A recent study¹⁵ by Fehr & Peers was conducted to determine the difference in trip rates between affordable housing units and market-rate units within the County of San Diego. According to ITE Trip Generation Manual 11th edition, a Multi-Family unit (Low rise and not close to rail transit, category 220) generates an average of 6.74 trips per day and an affordable housing unit (category 223) generates an average of 4.81 trips per day. Because the OPR recommended threshold is 15% below average, it is reasonable to use 15% below average trip generation rate for market-rate Multi-Family (Low rise) calculated at 5.73 trips per unit as impact threshold. The blend of affordable housing and market rate housing that results in a trip generation rate of 5.73 trips/unit is 52% affordable and 48% market rate.

¹⁵ Fehr & Peers, Affordable Housing and SB 743 VMT – Screening Considerations, Memorandum prepared for the County of San Diego dated December 3, 2018.
<https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/SB743/County%20of%20San%20Diego%20Trip%20Generation%20at%20Affordable%20Housing%20Developments%20Final%2012032021.pdf>

Thresholds

If a project is required to complete a VMT analysis, the project's impacts to the transportation system would be significant if the VMT would exceed any of the thresholds below.

Residential

Threshold – 15% below the City Average VMT/capita

Evidence – The OPR Technical Advisory provides that, "residential development that would generate vehicle travel that is 15 or more percent below the existing residential VMT per capita, measured against the region or city, may indicate a less-than-significant transportation impact."

General Employment

Threshold – 15% below the Regional Average VMT/employee

Evidence – The OPR Technical Advisory provides that, "office projects that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact."

Industrial Employment

Threshold – At or below regional average VMT/employee

Evidence – The OPR Technical Advisory states, "Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends the quantified thresholds described above for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types." Purely industrial uses are desired to be located in locations that are less dense and not within urban areas, which typically have higher VMT/employee. Industrial land uses are land intensive; therefore, placing industrial land uses in less urban areas characterized by having higher VMT/employee allows land in efficient VMT areas to be more effectively utilized as high density residential and commercial uses. This threshold is consistent with achieving an overall reduction in Regional VMT as it recognizes that industrial uses, which are relatively lower total VMT generating uses, are most appropriate in areas that have a lower potential to reduce VMT because it results in more available land within areas with a high potential to achieve VMT reductions for more dense development.

Regional Retail, Regional Recreational, or Regional Public Facilities

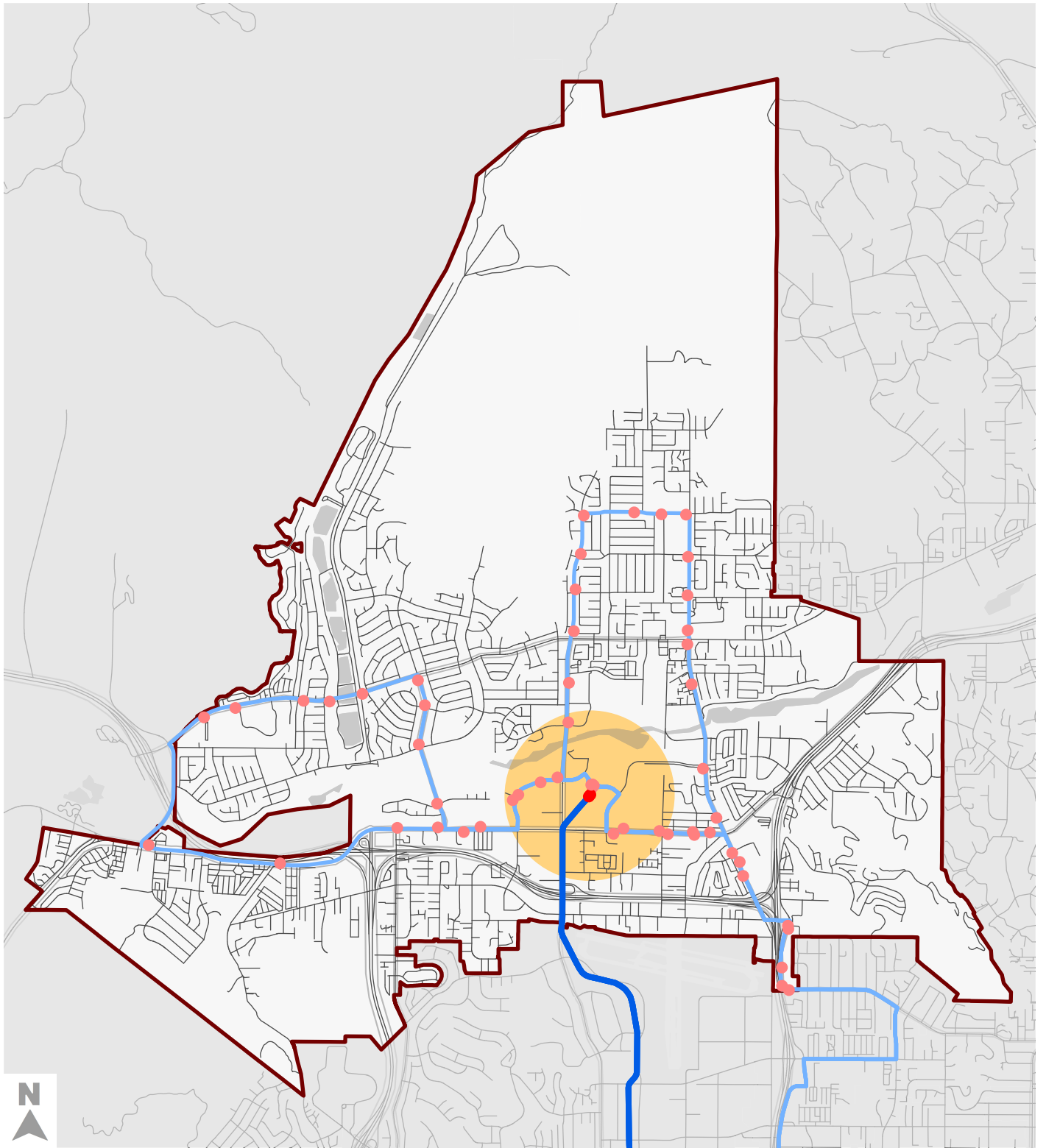
Threshold – A net increase in total regional VMT using the boundary method







Evidence – The OPR Technical Advisory states, “Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts... Regional-serving retail development... which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less than significant.”

Regional Retail within the City of Santee will be analyzed consistent with the OPR Technical Advisory. Regional Retail uses that attract customers from the region and beyond are defined in the SANDAG (*Not So*) *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* as “Regional Shopping Center,” and “Super Regional Shopping Center.”

The recommendations for regional retail uses can also be applied to regional recreational and regional public facilities since these types of facilities operate in a similar way from a transportation/customer attraction perspective.

Appendix D: Existing Major Transit Stops and Existing High-Quality Transit Corridors



-  City of Santee
-  Transit Priority Area
-  High Quality Transit Route
-  Other Transit Routes
-  High Quality Transit Stop
-  Other Transit Stops



High-Quality Transit Corridors and Transit Stops

Appendix E: Land Use Designations

Table E1 provides a list of unique project types and the land use type they should be considered under for SB 743 screening and analysis.

Table E1: Land Use Categories

| Land Use Category for SB 743 Analysis for all Project Types | |
|--|--|
| 1. Residential Projects | |
| <ul style="list-style-type: none"> • Estate, Urban, or Rural • Single Family Detached • Condominium • Apartment • Transitional Housing | <ul style="list-style-type: none"> • Military Housing (off-base, multi-family) • Mobile Home • Retirement Community • Congregate/Recuperative Care Facility |
| 2. General Employment Projects | |
| <ul style="list-style-type: none"> • Agriculture • Hospital: General • Hospital: Convalescent/Nursing • Industrial/Business Park (commercial included) • Science Research & Development • Hotel (with convention facilities/restaurant) • Motel • Resort Hotel • Business Hotel | <ul style="list-style-type: none"> • Military • Standard Commercial Office • Large (High-Rise) Commercial Office • Office Park • Single Tenant Office • Corporate Headquarters (without commercial) • Government Offices (Use is primarily office with employees; no substantial in-person service) • Medical/Dental |
| 3. Industrial Employment Projects | |
| <ul style="list-style-type: none"> • Industrial Park (no commercial) • Industrial Plant (multiple shifts) • Manufacturing/Assembly | <ul style="list-style-type: none"> • Warehousing • Storage |
| 4. Regional Retail Projects (includes Recreational Uses): Not Locally-Serving | |
| <ul style="list-style-type: none"> • Super Regional Shopping Center • Regional Shopping Center • Community Shopping Center | <ul style="list-style-type: none"> • Parks: Amusement • Golf Course (includes driving ranges) |

Table E1: Land Use Categories

Land Use Category for SB 743 Analysis for all Project Types

5. Retail Projects (includes Recreational Uses): May qualify for locally-serving based on size/market study

- | | |
|--|---|
| <ul style="list-style-type: none"> • Bars/Wine Bars • Car Wash • Gasoline • Auto Sales (Dealer & Repair) • Auto Repair Center • Auto Parts Sales • Quick Lube • Tire Store • Neighborhood Shopping Center • Commercial Shops • Mixed Use: Commercial (with supermarket)/ Residential: <i>consider each land use type separately for screening</i> | <ul style="list-style-type: none"> • Bowling Center • Multi-purpose (miniature golf, video arcade, batting cage, etc.) • Racquetball/Health Club • Tennis Courts • Sports Facilities (indoor/outdoor) • Theaters (multiplex with matinee) • Restaurant • Financial (Bank or Savings & Loan) |
|--|---|

6. Regional Public Facilities: Generally Not Locally-Serving

- | | |
|--|---|
| <ul style="list-style-type: none"> • Airport: Commercial • Airport: General Aviation • Airport: Heliports • Regional House of Worship/Cemetery • University (4 years) • Junior College (2 years) • High School: Private • Middle/Junior High School: Private | <ul style="list-style-type: none"> • Elementary School: Private • Parks: Regional (developed) • Parks: State • Bus Depot • Truck Terminal • Landfill & Recycling Center |
|--|---|

7. Locally-Serving Public Facilities

- | | |
|---|--|
| <ul style="list-style-type: none"> • High School: Public • Middle/Junior High School: Public • Elementary School: Public • Day Care (Public or Private) • Library • Park: City • Park: Neighborhood/County | <ul style="list-style-type: none"> • Post Office • Department of Motor Vehicles • Government Offices (Providing primarily in-person customer service) • Transit Station (light rail with parking) • Park & Ride Lots • House of Worship/Cemetery |
|---|--|

* Land use designations match the categories in SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region.

Appendix F: Transportation Project Screening

Transportation Project Screening Criteria

The following complete list is provided in the OPR Technical Advisory (December 2018, Pages 20-21) and refined for the City of Santee for transportation projects that, "would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis."

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity
- Roadside safety devices or hardware installation, such as median barriers and guardrails
- Roadway shoulder enhancements to provide "breakdown space," dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes
- Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left-turn lanes, or emergency breakdown lanes that are not utilized as through lanes
- Addition of roadway capacity on local or collector streets, provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
- Closing gaps in the transportation network in conformance with the Mobility Element of the General Plan where the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit.
- Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel
- Addition of a new lane that is permanently restricted to use only by transit vehicles
- Reduction in number of through lanes
- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles
- Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
- Installation of traffic metering systems, detection systems, cameras, changeable message signs, and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
- Timing of signals to optimize vehicle, bicycle, or pedestrian flow
- Installation of roundabouts, or traffic circles
- Traffic signal modifications and new traffic signals where warrants are met by existing levels of traffic and the project improves accessibility for active transportation.

- Installation or reconfiguration of traffic calming devices
- Adoption of or increase in tolls
- Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase
- Initiation of new transit service
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
- Removal or relocation of off-street or on-street parking spaces
- Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
- Addition of traffic wayfinding signage
- Rehabilitation and maintenance projects that do not add motor vehicle capacity
- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel
- Installation of publicly available alternative fuel/charging infrastructure
- Addition of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor

Appendix G: VMT Mitigation Sample Calculation

VMT Mitigation Sample Calculation

The following provides a sample TDM calculation (it is not intended to demonstrate the only measures that would be available to projects). For this example, each VMT reduction strategy is calculated individually then combined in the equation to determine the overall VMT reduction. The direct sum of all strategies results in a total of (2% + 1% + 4% + 1% =) 8.0%; however, the overall VMT reduction is calculated at 7.8% using the multiplicative formula to account for the fact that some strategies could be redundant or duplicative in nature.

- **Trip Reduction Program**

- T-9 : Implement Subsidized or Discounted Transit Program = 2%
- T-10: Provide End-of-Trip bicycle facilities = 1%
- Combined sub-sector %VMT reduction = $1 - (1 - 2\%) \times (1 - 1\%) = 2.9\%$

- **Parking or Road Pricing/Management**

- T-15: Limit Residential Parking Supply = 4%
- T-16: Unbundle residential parking cost from property cost = 1%
- Combined sub-sector %VMT reduction = $1 - (1 - 4\%) \times (1 - 1\%) = 4.9\%$

Total VMT Reduction = $1 - [(1 - 2.9\%) \times (1 - 4.9\%)] = 7.8\%$