



FEHR  PEERS

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# Cupertino LOS to VMT Transition Project

# Key Takeaways

- Changes in state law require CEQA review to evaluate transportation impacts **using Vehicle Miles Traveled (VMT) rather than Level of Service**

# Key Takeaways

- VMT is already in use for Air Quality, Greenhouse Gas Emissions, and Noise analysis under CEQA. **Transportation analysis will continue to use many of the same tools, but report different outputs**
- These tools include:
  - ITE Trip Generation Manuals
  - VTA Travel Demand Forecasting Model
  - MTC Regional Models
  - Local data on trip lengths and purposes

# Key Takeaways

- The City can continue to evaluate projects for their effects on LOS **as part of assessing general plan compliance, outside of the CEQA process.**
  - The LOS standards set in the General Plan continue to remain as part of the General Plan

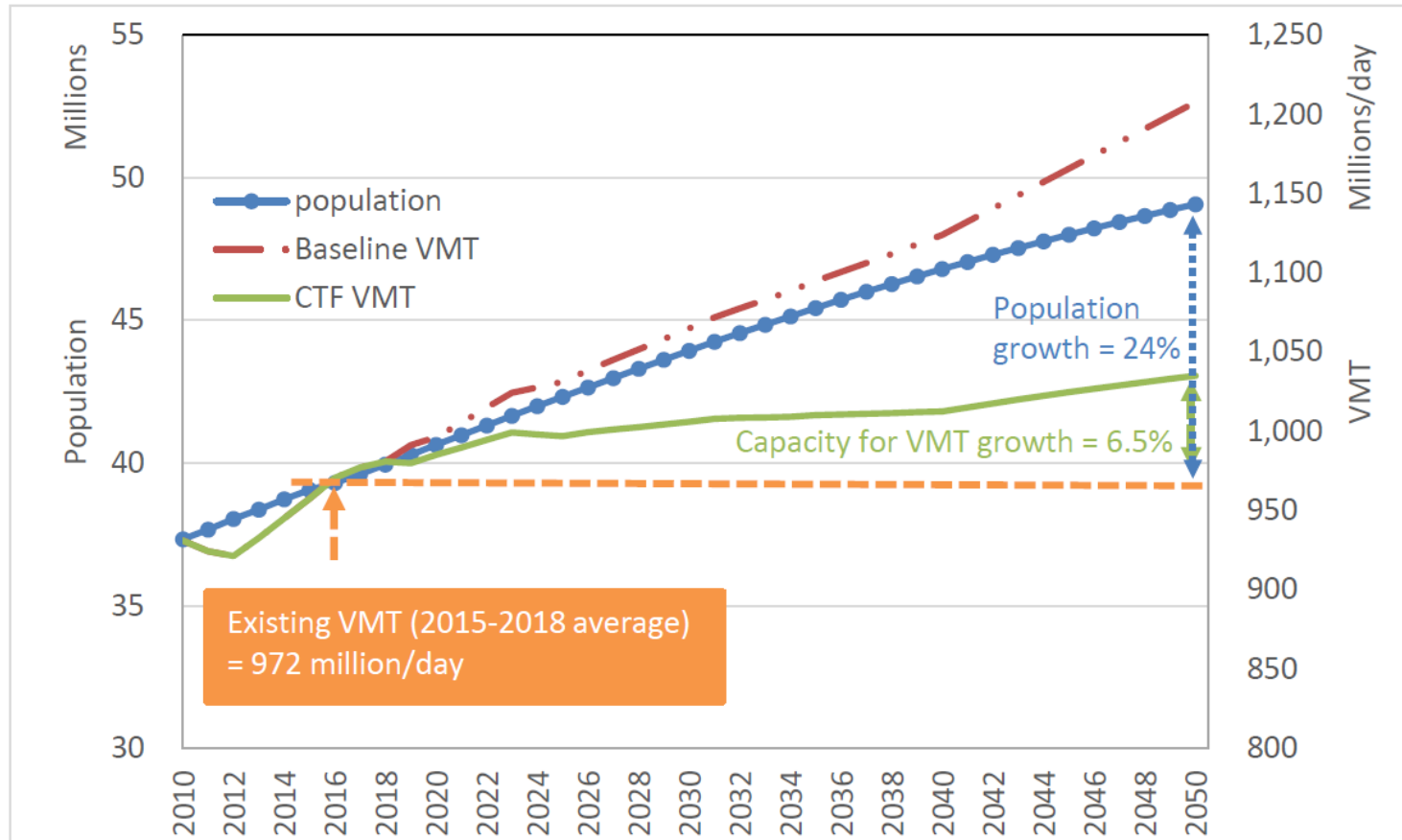
# Action Requested

- This agenda item is intended to allow the Commission to **recommend**
  - A VMT reduction thresholds for land use projects and plans.
  - A VMT impact threshold for transportation projects
  - “Screening” guidance to identify projects exempt from detailed VMT analysis
- This recommendation will be transmitted to the Council for final adoption.

# Setting a Threshold

- The state Office of Planning and Research has issued **guidance for local agencies to implement this change**. The State's guidance for thresholds is based on meeting statewide GHG reduction targets.

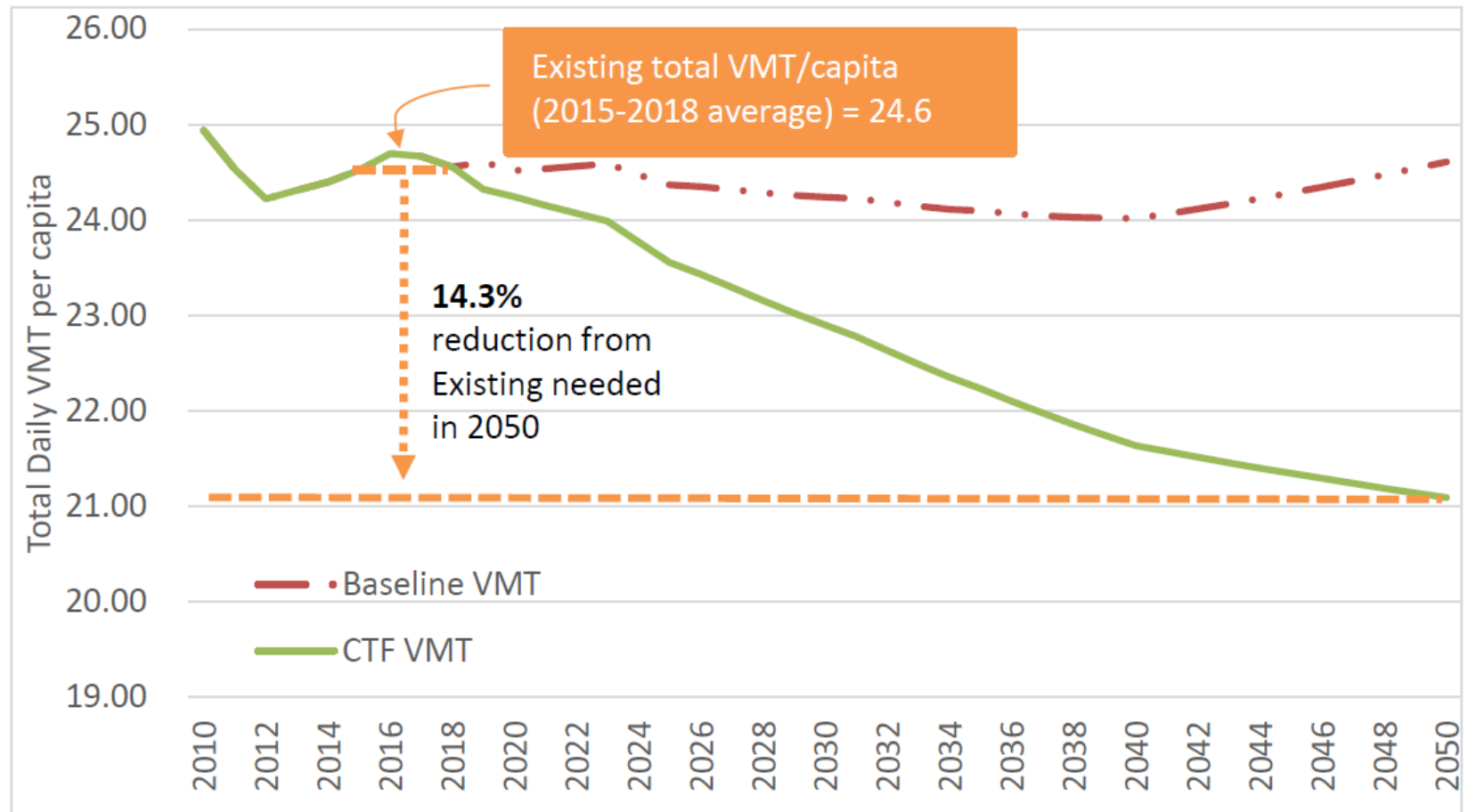
# Setting a Threshold



**Figure 1: California Total Projected Population Growth and VMT Growth**

Source: 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals, CARB (pg. 7) [https://ww2.arb.ca.gov/sites/default/files/2019-01/2017\\_sp\\_vmt\\_reductions\\_jan19.pdf](https://ww2.arb.ca.gov/sites/default/files/2019-01/2017_sp_vmt_reductions_jan19.pdf)

# Setting a Threshold



**Figure 2: California Total Daily VMT Per Capita**



# Setting a Threshold

- **As a Lead Agency, the City of Cupertino has discretion to adopt a VMT impact threshold based on substantial evidence**
- The White Paper included in the meeting agenda summarizes many of the options, most of which involve **assessing per capita VMT, and comparing that to the existing citywide average.**

# Setting a Threshold

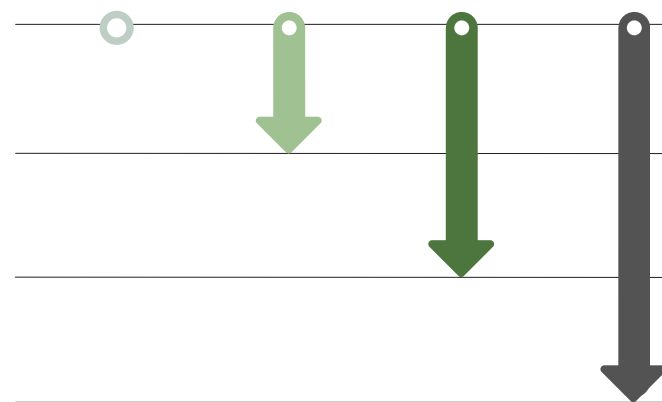
- **Cupertino has four primary options for setting its thresholds, based on the following rationale:**
  1. VMT continues to increase proportional to population
  2. VMT increases, but at a slower rate than otherwise
  3. Total City-Generated VMT remains stable even with population growth
  4. Total City-generated VMT decreases even as population increases

# VMT Threshold

Per Capita VMT Rate Reduction

Change in Total VMT Generated by the City

0%



1 Continued Growth of VMT

2 Moderated Growth of VMT

3 No VMT Growth

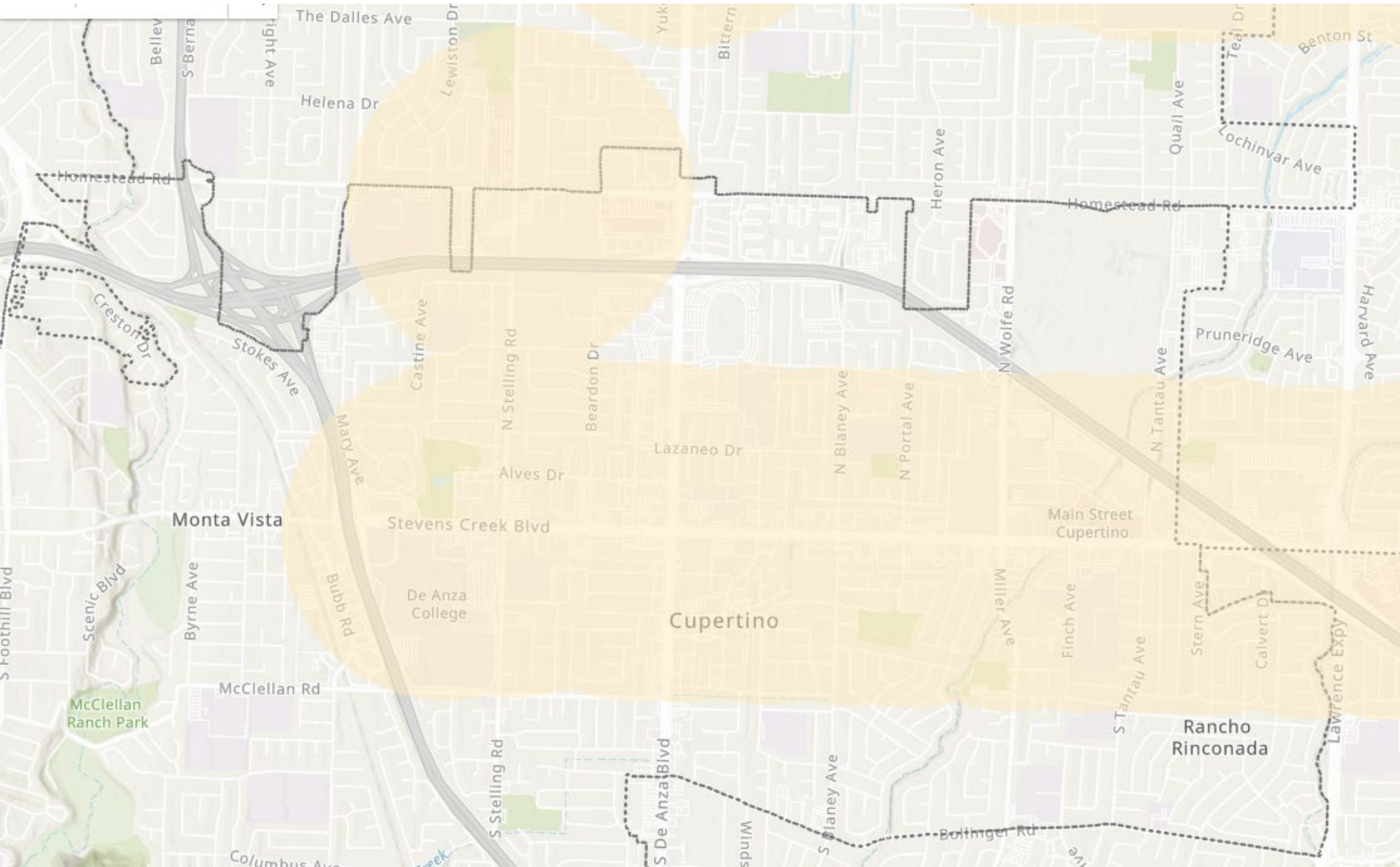
4 Reduced VMT

# Percent Reduction Targets

Option	Total City Generated VMT	City-Generated VMT per Person
<b>Baseline</b>	<b>3,219,660</b>	<b>34.0</b>
1. VMT continues to increase proportional to population (as in 2040 General Plan)	<b>3,792,470</b> (17.8% increase in baseline VMT)	<b>32.2</b> (-5.3% change)
2. VMT increases, but at a slower rate than otherwise ( <b>Similar to OPR recommendation</b> )	<b>3,429,140</b> (6.5% increase in baseline VMT)	<b>29.1</b> (-14.4% change)
3. Total City-Generated VMT remains stable even with population growth	<b>3,219,660</b> (0% increase in baseline VMT)	<b>27.3</b> (-19.7% change)
4. Total City-generated VMT decreases even as population increases	<b>2,839,940</b> (-11.8% reduction in baseline VMT)	<b>24.1</b> (-29.1% change)

# Exceptions / Presumed Less-than-Significant Impacts

- **Under CEQA Statute: Projects within ½ mile of a High Quality Transit Corridor** (much of Stevens Creek Boulevard) should be **presumed** to have a less-than-significant impact (absent certain extenuating circumstances)



# Exceptions / Presumed Less-than-Significant Impacts

- **Other Exceptions named in Statute:**
  - \*100% Affordable Housing Projects
  - \*Small Projects (<110 daily vehicle trips)
  - \*Transportation projects that do not add additional VMT
- **Other Exceptions in OPR Guidance:**
  - Local-Serving Retail <50,000 s.f.
  - Projects in Low-VMT Areas

# Impacts and Mitigation

- Because Cupertino is a higher VMT location, **most projects will likely have significant and unavoidable impacts on VMT**
- Mitigation for VMT impacts takes the form of TDM, changes to the overall city and transportation network, and regional policies
- Regional mitigation strategies such as banks and exchanges are still being discussed, and are not yet available as feasible options for mitigation



# Future of LOS Analysis for Development

- These thresholds apply to CEQA analysis. **The City can include LOS analysis to assess General Plan compliance through the discretionary review process**
- Standards for performing and documenting this analysis can be developed through staff-level action. **The LOS requirements for the City are set in the General Plan.**
- New developments may therefore **identify deficiencies and have conditions** to build improvements, rather than impacts and mitigation measures based on delay.

# Baseline Thresholds

- What is the VMT significance threshold for land use projects and land use plans under baseline conditions?
  - Land Use Projects and Plans
    - Project Impact: A significant impact would occur if the **total project generated VMT per service population** for the project would exceed a level of **14.4% below** the **citywide baseline VMT rate**.
    - Project Effect (Projects only): A significant impact would occur if the project **increases total (boundary) countywide VMT** compared to **baseline conditions**.

# Cumulative Thresholds

- What is the VMT significance threshold for land use projects and land use plans under cumulative conditions?
  - Land Use Projects and Plans
    - Project Effect: A significant impact would occur if the project **increases total (boundary) countywide VMT** compared to **cumulative no project conditions**.
  - All land use and transportation projects: A significant impact would occur if the project is inconsistent with the Regional Transportation Plan/Sustainable Community Strategy Plan (Plan Bay Area).

# Transportation Project Thresholds

- What is the VMT significance threshold for transportation projects?
  - Baseline Transportation Thresholds: A significant impact would occur if a project causes a net increase in total (boundary) citywide VMT compared to baseline conditions or opening year no project conditions.
  - Cumulative Transportation Thresholds: A significant impact would occur if a project causes a net increase in total (boundary) citywide VMT compared to cumulative no project conditions.

# Mitigation

- What VMT reduction strategies are feasible?
  - Transportation Demand Management with a Transportation Management Association
  - Site Design
  - Regional Policies
    - Location Efficiency
    - Regional Land Use Policies
    - Regional Infrastructure
  - Consider emerging VMT mitigation options like VMT cap, VMT fee, VMT bank, and VMT exchange.



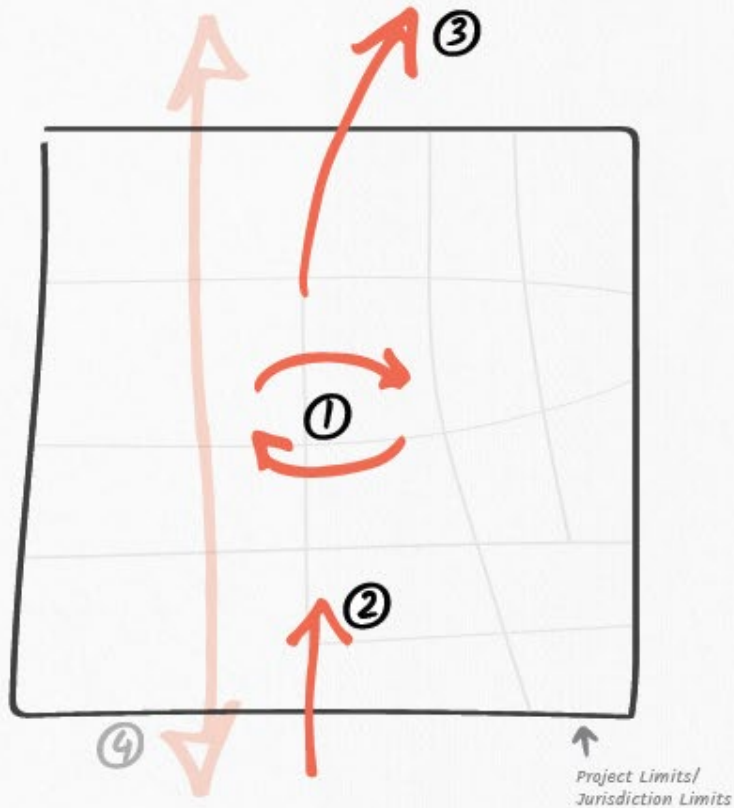


Questions?



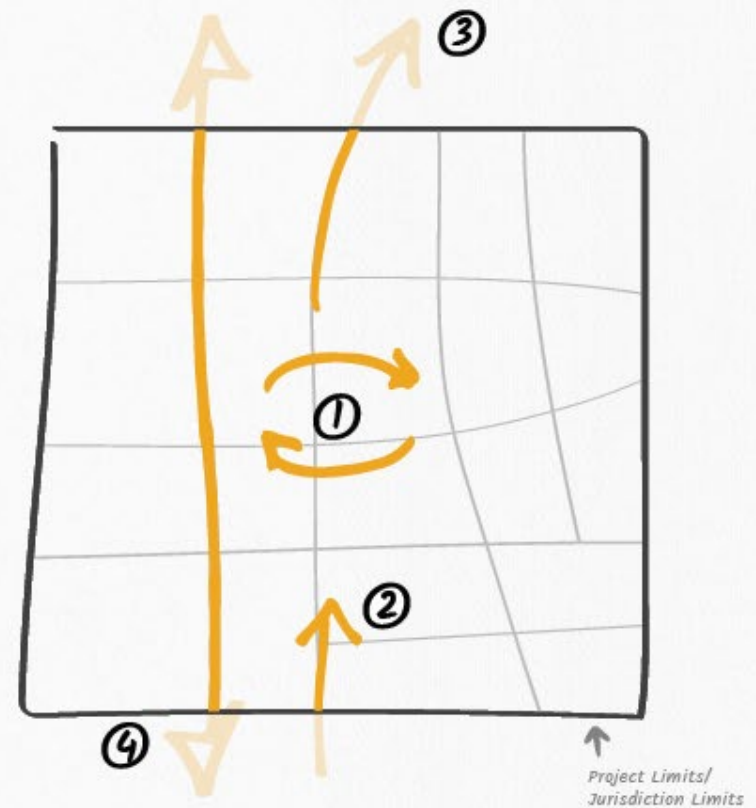
# Metric

## Project Generated VMT



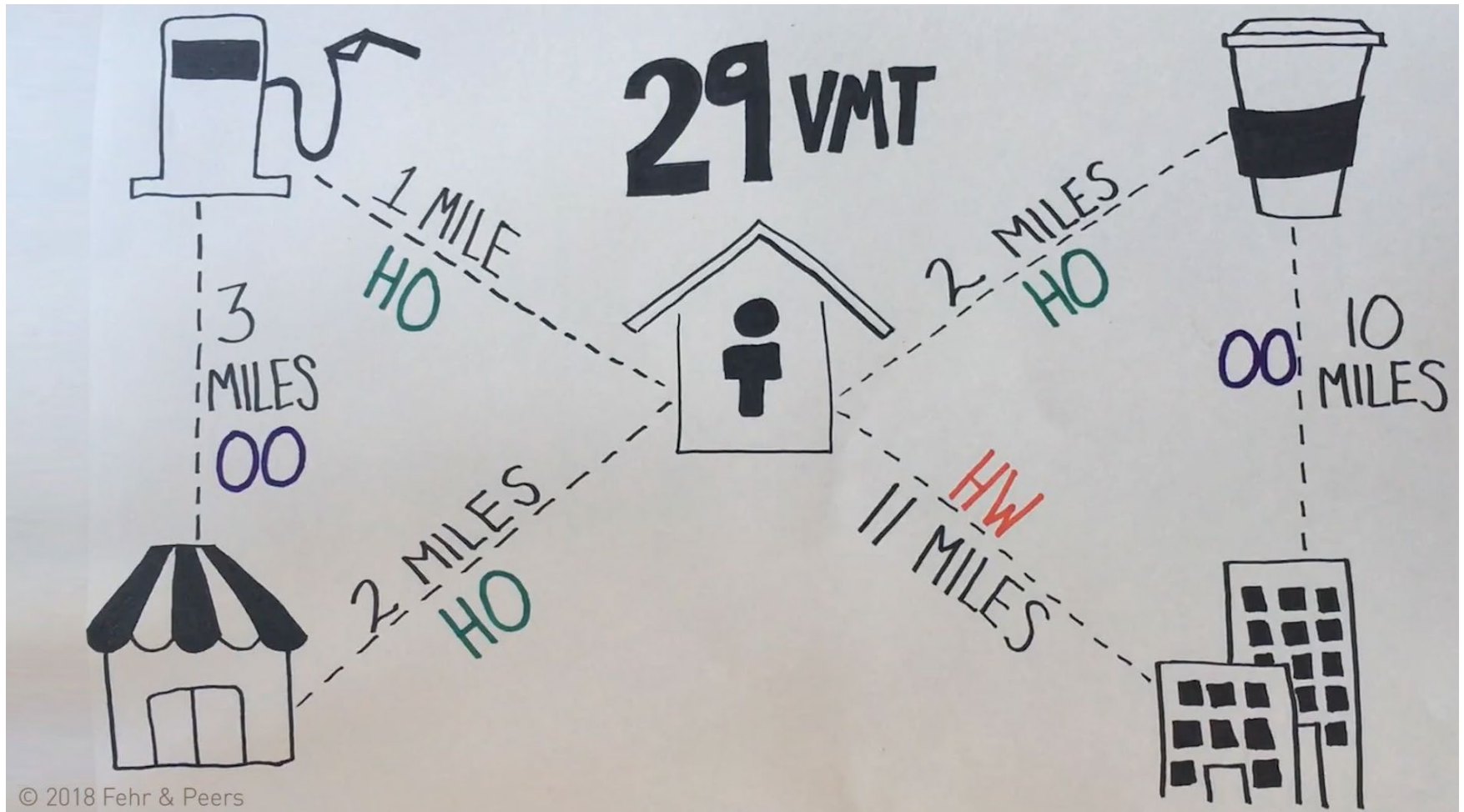
- ① 2x Internal to Internal (2xII) VMT
- ② External to Internal (XI) VMT
- ③ Internal to External (IX) VMT
- ④ External to External (XX) VMT

## Project Effect on VMT (Boundary VMT)



- ① Internal to Internal VMT
- ② External to Internal (XI) VMT
- ③ Internal to External (IX) VMT
- ④ External to External (XX) VMT

# Additional Slides





# Mitigation Actions

## Transportation Demand Management (TDM)

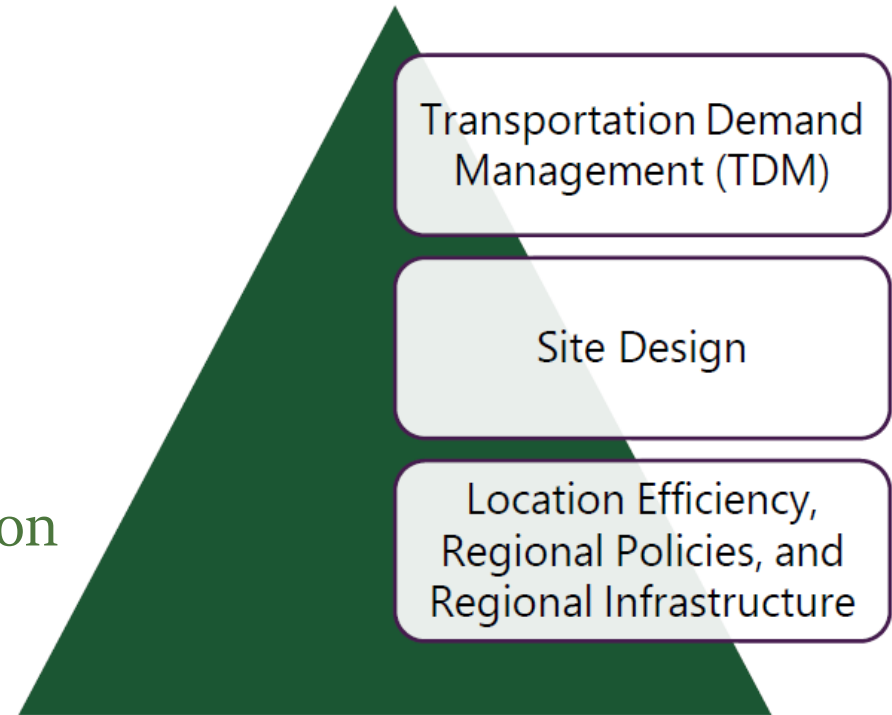
- Effectiveness depends on project site context and tenants
- Requires monitoring

## Built Environment

- Is changing the project land use or transportation network feasible?

## Regional/Program VMT Mitigation

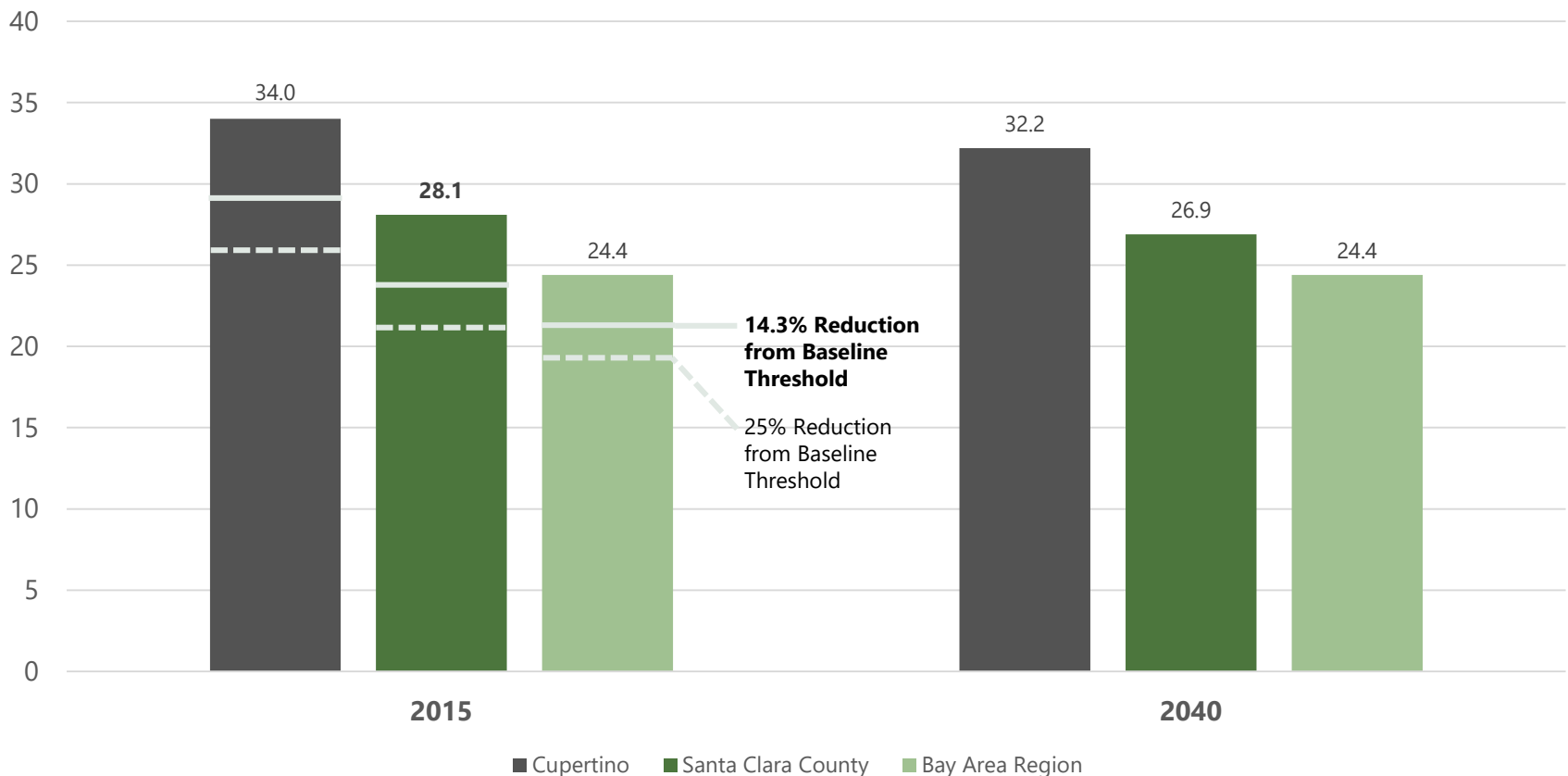
- VMT Impact Fee
- VMT Bank or Exchange



# Thresholds

“ ...a total VMT per service population that is 14.3%, 25% or X% below that of the baseline average of the City, County, or Region may be a reasonable threshold. ”

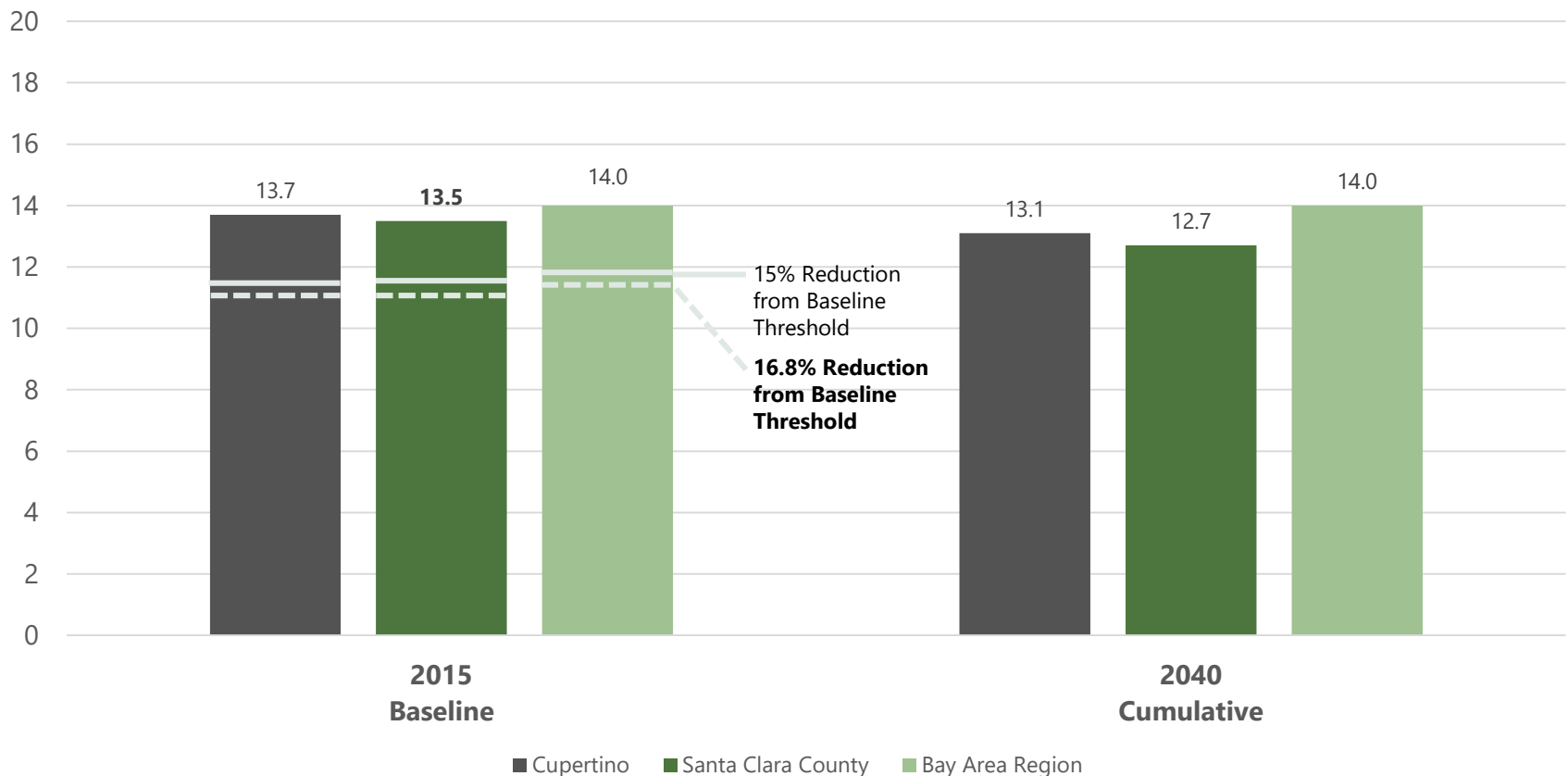
Total VMT per Service Population



# Thresholds

“ ...a *home-based VMT per resident* that is 15%, 16.8%, or X% below that of the baseline average of the **City, County, or Region** may be a reasonable threshold.”

## Home-Based VMT per Resident



# Thresholds

“ ...a *home-based work VMT per employee* that is **15%**, **16.8%**, or **X%** below that of the baseline average of the **City, County, or Region** may be a reasonable threshold.”

## Home-Based Work VMT per Employee

