



CITY OF SAN MATEO

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Agenda Report

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TO: Planning Commission

FROM: Brad Underwood

PREPARED BY: Public Works Department

MEETING DATE: June 23, 2020

SUBJECT:

Transportation Impact Analysis (TIA) Guidelines and General Plan Amendment

RECOMMENDATION:

Adopt a resolution recommending City Council adoption of the General Plan Amendments to the Circulation Element and make a motion to recommend City Council adoption of the proposed Transportation Impact Analysis (TIA) Guidelines.

BACKGROUND:

The purpose of this agenda report is to introduce the draft Transportation Impact Analysis (TIA) Guidelines and a supporting draft General Plan Amendment for Planning Commission review and recommendation to City Council. The TIA Guidelines have been developed to implement vehicle miles traveled (VMT) as the transportation analysis metric for California Environmental Quality Act (CEQA) analysis, and to formalize the City's procedures for transportation analysis outside of CEQA, including provision for certain criteria under which a project may be "screened out" from CEQA analysis.

A TIA evaluates potential negative effects of proposed projects on the City's transportation network, in part by assessing future conditions of the circulation network both with and without the proposed future project. If a CEQA transportation analysis is required, the TIA will determine if those effects constitute a significant impact, and if so, how those impacts can be mitigated to a less than significant level. Additionally, analysis in addition to that required by CEQA may be conducted to assess any issues that may indicate non-conformance with locally adopted plans. TIA guidelines serve to provide a framework establishing the expected analyses for the City, and the requirements projects are expected to adhere to regarding transportation analyses.

Transportation analysis conducted by the City under CEQA has historically evaluated Level of Service (LOS) and vehicle delay at intersections to assess localized traffic impacts as a result of planned development. As a result of the passage of California Senate Bill 743 (SB 743), the state sets the intent and goals for transportation analysis to more directly tie impacts of development projects to the overarching state goals of greenhouse gas emissions reduction and increase in multimodal transportation options. To this end, SB 743 eliminates LOS, vehicle delay, or other similar measures of vehicular capacity or congestion as the metric to assess significant transportation impacts under CEQA. To align transportation analysis with state goals for climate change and active transportation, the Governor's Office of Policy and Research (OPR) developed guidelines for new metrics to utilize in CEQA transportation analyses. OPR published a final technical advisory, based on stakeholder engagement and feedback, during December 2018 that identifies Vehicle Miles Traveled (VMT) as the required metric for transportation analysis under CEQA. The draft TIA Guidelines prepared for the City of San Mateo present the policy for VMT analysis for CEQA.

In addition to the TIA guidelines, an amendment to the General Plan Circulation Element is proposed to provide the policy framework for the TIA Guidelines and modification in use of Level of Service in local transportation analysis. As currently written, the Circulation Element contains requirements for development projects to adhere to specific LOS standards.

However, these requirements are tied to CEQA determination of significant impact. Given transportation analysis under CEQA is now required to utilize VMT, staff has proposed these General Plan amendments to remove the link between CEQA and LOS in order to utilize local transportation analysis to assess operational improvements that may be necessary beyond identified environmental impacts.

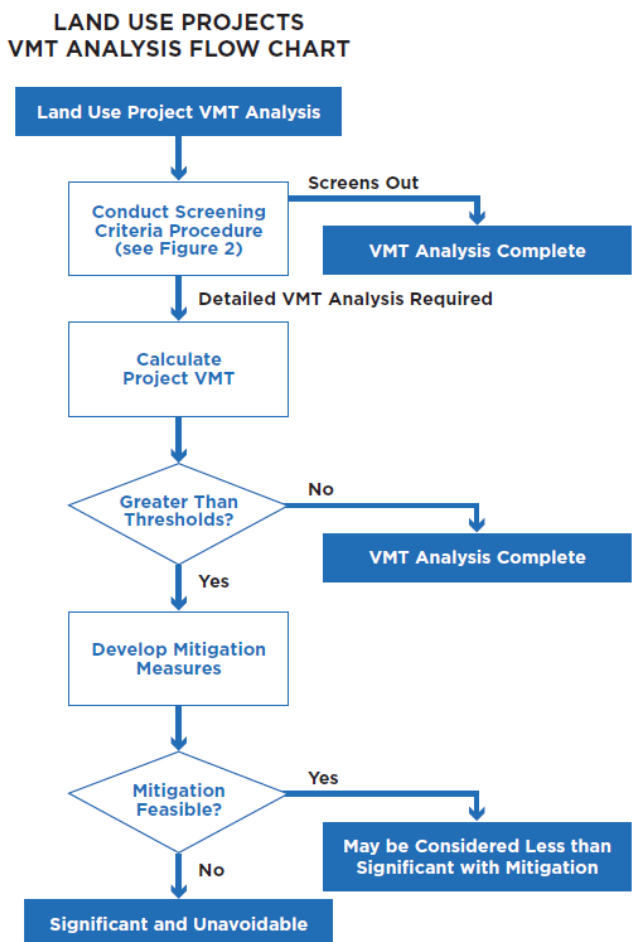
Transportation Impact Analysis (TIA) Guidelines

The TIA guidelines provide processes for analyzing the potential transportation impact of land use and transportation projects for both CEQA review and the City’s adopted local plans. The guidelines were created to provide a consistent methodology to analyze environmental impacts and operational effects for local projects. The TIA guidelines include:

- Parameters for when transportation analysis is required;
- Guidance on determination of impacts and negative effects;
- Technical processes for calculating VMT for projects;
- Mitigation measures for VMT impacts and local plan requirements for negative LOS effects;
- Required analysis for CEQA and local transportation purposes.

CEQA Analysis Requirements

Under the proposed TIA guidelines, when a development project is received, the staff evaluation will determine whether a potential for environmental impacts exists and a VMT analysis is required. The proposed TIA guidelines contain screening criteria to streamline this process, and quickly determine types of projects that are assumed to have a less than significant VMT impact. A TIA with VMT analysis of all transportation impacts would be required for those projects that do not “screen out” based on the procedure outlined in the flow chart below.



The following screening criteria are consistent with OPR's Technical Advisory, and are included in the City's policy. Criteria that differ from OPR's guidelines are noted.

Project that meet one or more of the following criteria do not require further VMT review:

- Location
 - OPR recommendation: Projects within ½ mile of a major transit stop (e.g. Caltrain) or a high-quality transit stop (e.g. SamTrans ECR stops in San Mateo)
- Size
 - OPR Recommendation: "Small projects" with fewer than 110 daily trips may be screened out
 - City modification: Projects that generate or attract fewer than 110 vehicle trips per day are presumed to have a less than significant VMT impact.

Land Use Type	Number of Units/ Square Feet	Corresponding Daily Trips
Single Family Residential	10 Dwelling Units	110
Multi-Family Residential	11 Dwelling Units	104
Office	11,000 SF	107

- Project Type
 - OPR recommendation: 100% affordable housing in infill locations near transit may be screened out
 - City modification: Any 100% affordable housing project, regardless of location, may be screened out

Projects not screened out based on these criteria will be required to conduct a full VMT analysis under CEQA, beginning with a detailed evaluation of the VMT generated by the project. The VMT calculated for a project will be based on a specific population to assess the effects of the project as they relate to specific groups of people making those trips. This would be determined as either VMT per employee for office projects or VMT per resident for residential projects. The average VMT per capita and per employee has been assessed for each audience based on City average and County average.

For City projects, the County will be utilized as the baseline geographic area to best assess the transportation impacts of projects; the City average does not provide sufficient information given the large percentage of trips beyond the City's borders. As such, projects that generate VMT greater than 15% below the San Mateo County average VMT rate (by service population) would be identified as creating a VMT impact. These values are noted in grey shade below (e.g. County average per capita VMT is 15.5, and the 15% below average value is 13.1 VMT per capita).

Project Type	Baseline Geography	VMT Average	VMT 15% Below Average ¹
Residential	City	16.0 VMT/capita	13.6 VMT/capita
	County	15.5 VMT/capita	13.1 VMT/capita
Office	City ²	16.7 VMT/employee	14.2 VMT/employee
	County	18.0 VMT/employee	15.3 VMT/employee

Note: 1. These thresholds represent a 15 percent reduction from their respective averages. 2 For informational purposes only, OPR does not recommend the use of a Citywide VMT average to establish thresholds for office uses.

Grey shade cells indicate a suggested threshold for land use projects.

Further, the thresholds to determine impact is identified by each land use category.

Land Use Type	Impact Threshold
Residential	Projects greater than 15% below average County VMT/capita
Office	Projects greater than 15% below average County VMT/employee
Retail	A net increase in total VMT
Other Land Uses	City will make a determination of applicable thresholds on a case-by-case basis based on land use type, project description, and setting.
Mixed Use Projects	Evaluate each component separately and apply the impact threshold for each land use type

Projects identified as generating a VMT impact would be required to mitigate the impact to a less than significant level. As contained within the TIA guidelines, mitigation strategies for VMT impacts include:

- Modifying the project to remove the impact
- Transportation Demand Management (TDM) measures
- Paying into a VMT “bank” or other program such as a future City fee program to provide projects that reduce VMT throughout the City of San Mateo

Local Transportation Analysis Requirements

All projects will be reviewed for consistency with City-adopted plans, despite not being required per CEQA. This includes the City’s General Plan, Climate Action Plan, etc. SB 743 does not prescribe the method by which cities conduct transportation analysis for local impacts or for conformance with locally adopted plans. In other words, City’s may still conduct LOS analysis as required by local plans and policies, however, findings from the LOS analysis will not be applicable to the CEQA review.

In May, staff received City Council direction regarding how to conduct local transportation analysis moving forward to ensure compliance with the standards currently set in the General Plan. City Council opted to utilize Level of Service (LOS) in a limited geographic area for each project to assess project access and circulation with respect to the local roadway network, and to assess potential negative effects of the project on local roadways beyond that which is assessed through CEQA analysis. The local transportation analysis process includes:

- **Data Collection and Study Periods:** This subsection includes requirements for collecting traffic volumes and what analysis periods should be studied.
- **Study Area:** Provides parameters for determining the appropriate study facilities (intersections and roadway segments along and adjacent to the project, as well as any locations determined in consultation with City staff). The limited LOS analysis is focused on project access and ensures that the analysis required correlates to the size of the project proposed.
- **Study Scenarios:** Lists required scenarios to analyze with and without the project (Existing No/Plus Project and Horizon Year No/Plus Project scenarios).
- **Forecasting:** Provides guidance for forecasting horizon year volumes using the City of San Mateo travel demand model or other methodologies.
- **Operations Analysis Methodology:** Provides the requirements for analyzing peak hour intersection operations under the Highway Capacity Manual (HCM) methodology and roadway segments under the 24-hour volume over capacity (V/C) methodology.
- **LOS Standards:** Outlines LOS standards based on the General Plan that the City strives to maintain.

- **Other Analysis Requirements:** This section will discuss non-LOS analysis requirements consisting of on-site assessments of driveway queuing, internal vehicular and non-vehicular circulation, driveway sight distance, and code consistency checks, and when these analyses will be required. This subsection will also include guidance on coordinating with other jurisdictions such as Caltrans, C/CAG, and adjacent cities if a project may affect another jurisdiction's facilities.

General Plan Amendment

The City's current Circulation Element of the General Plan contains numerous policies requiring that development projects adhere to a stated LOS standard. Specifically, Policy C2.1 identifies the City's standard as "Maintain a Level of Service no worse than mid LOS D, average delay of 45.0 seconds, as the acceptable Level of Service for all intersections within the City." Further, Policy C2.7 details requirements for development projects to fund off-site circulation improvements if the project-generated traffic degrades the performance of the transportation network below these thresholds.

In order to determine when transportation improvements beyond payment of the City's transportation impact fee (TIF) will be required, the Circulation Element states that additional improvements will be required when traffic impacts have been deemed "significant" in a CEQA analysis. General Plan Policy C2.7 defines "significance" by LOS. The CEQA-specific language in the General Plan policies and the requirement for use of VMT under CEQA limits the City's ability to utilize these policies to implement transportation improvements to negate adverse effects of increased congestion.

The City, led by the Community Development Department, is currently updating the General Plan, which is expected to be complete in 2023. Through this update process, the City will have the opportunity to evaluate potential, new transportation metrics, to assess local effects of development projects outside of CEQA, and to consider if LOS is the transportation metric for use in the future. However, during this interim time period between when the new VMT policy and TIA Guidelines are adopted and when General Plan 2040 will be complete, staff recommends modifications to allow the City to continue with local transportation analysis (e.g., LOS analysis) consistent with Council direction. The local analysis will be in addition to CEQA VMT analysis. The proposed General Plan amendment will modify those sections of the current General Plan to sever the tie between CEQA and LOS, and to support local transportation analysis to supplement CEQA analysis in assessing operational improvements that may be necessary beyond identified environmental impacts.

BUDGET IMPACT:

There is no budget impact associated with this item.

ENVIRONMENTAL DETERMINATION:

Review and recommendation for the TIA Guidelines is not a project subject to CEQA, because it is an organizational or administrative activity that will not result in direct or indirect physical changes in the environment. (CEQA Guidelines Section 15378(b)(5).) Adoption of the resolution recommending City Council adoption of the General Plan Amendments to the Circulation Element is not a project subject to CEQA in that it can be seen with certainty that there is no possibility that the amendments will cause a significant impact to the environment. The purpose of the General Plan amendments is to allow the City to continue the use of Level of Service standards to impose ad hoc exactions.

NOTICE PROVIDED

All meeting noticing requirements were met.

ATTACHMENTS

- Att 1 – Draft Transportation Impact Analysis (TIA) Guidelines
- Att 2 – Draft General Plan Circulation Element Revisions
- Att 3 – Draft Resolution
- Att 4 – Screening Criteria and Key Recommendations Memo
- Att 5 – Thresholds Considerations Memo

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