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TECHNICAL MEMORANDUM

Date: August 5, 2021

To: NVTa and Town of Yountville

Project No.: 069-026 Napa County VMT

From: Colin Burgett, Vamsee Modugula and Arthur Chen

Jurisdiction: Town of Yountville

Subject: **VMT Recommendations for Town of Yountville**

This memorandum describes recommended vehicle miles traveled (VMT) impact thresholds and screening criteria for consideration by the Town of Yountville, on behalf of the Napa Valley Transportation Authority (NVTa). These recommendations are based on current California Environmental Quality Act (CEQA) requirements pertaining to vehicle miles traveled (VMT) and Senate Bill (SB) 743.

1. BACKGROUND

CEQA, enacted in 1970, requires state and local agencies to inform decision makers and the public about the potential environmental impacts of proposed projects, and to reduce those impacts to the extent feasible. The California Office of Planning and Research (OPR) develops the *CEQA Guidelines* to interpret CEQA statute and published court decisions.

The version of the *CEQA Guidelines* adopted on December 28, 2018, includes updates related to analyzing transportation impacts pursuant to SB 743 that are contained in section 15064.3(b). SB 743 changed the way that public agencies evaluate the transportation impacts of projects under CEQA, recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (see Public Resource Code, Section 21099, subd. (b)(2)). Therefore, traffic level of service (LOS) may no longer be used to evaluate potential transportation impacts under CEQA. These provisions became effective on July 1, 2020.

OPR identified VMT as the most appropriate metric to determine the significance of transportation impacts in a manner that promotes the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses (OPR 2018). The new requirements, as described in CEQA Guidelines section 15064.3 (b), include the following specifications:

- “Vehicle miles traveled” refers to the amount and distance of automobile travel “attributable to a project¹.” Other relevant considerations may include the effects of the project on transit or non-motorized travel.

¹ As described separately in the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR, December 2018), VMT re-routed from other origins or destinations as the result of a project would not be attributable to a project except to the extent that the re-routing results in a net increase in VMT. For example, OPR guidelines note that retail projects typically re-route travel from other retail destinations, and therefore a retail project may lead to increases or decreases in VMT, depending on previously existing travel patterns. Similarly, a large share of retail trips are “pass-by trips” that would not generate VMT attributable to a retail project.

- Lead agencies have discretion to choose the most appropriate methodology to evaluate a project's vehicles miles traveled, including whether to express the change in absolute terms, per capita, per household or any other measure.
- A lead agency may use city or regional models to estimate a project's VMT and may revise those estimates to reflect professional judgment based on substantial evidence. If existing models or methods are not available to estimate the VMT for the project being considered: a lead agency may evaluate the project's VMT qualitatively.

2. CEQA SIGNIFICANCE CRITERIA FOR TRANSPORTATION IMPACTS

Pursuant to the CEQA Guidelines (as amended effective July 1, 2020), potentially significant environmental impacts related to transportation would result if a project would:

1. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; or
2. Conflict or be inconsistent with CEQA Guidelines section 15064.3 (b), which pertains to vehicle miles traveled (VMT); or
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment); or
4. Result in inadequate emergency access

(CEQA Guidelines, Appendix G)

Relevant to criterion 1 above: to make a less than significant determination, projects will need to be found consistent with relevant adopted transportation plans, ordinances or policies, including those contained within the Yountville General Plan and other relevant plans such as the Countywide Transportation Plan, Napa Countywide Bicycle Plan, Napa Countywide Pedestrian Plan, Napa County Short Range Transit Plan, and the Metropolitan Transportation Commission's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). However, if a project results in traffic delay that conflicts with an adopted level of service (LOS) standard or policy (including the LOS policy described on page CIR-2 of the *Yountville General Plan* Circulation Element): such a conflict shall not be considered a significant environmental impact under CEQA (based on the current CEQA guidelines). Instead, any analysis of LOS (if still desired as part of the development review process) could be required for planning and informational purposes during project review (but not for the purpose of evaluating environmental impacts under CEQA). (See OPR SB 743 Frequently Asked Questions, available at the following weblink: <https://opr.ca.gov/ceqa/updates/sb-743/faq.html#general-plans-with-los>).

Relevant to criterion 2 above: the remainder of this report describes the recommended VMT Impact Analysis process, criteria, and impact thresholds for consideration by the Town of Yountville. The impact analysis process, criteria, and impact thresholds are intended to satisfy the requirements of CEQA Guidelines section 15064.3 (b).

3. STATEWIDE RECOMMENDATIONS FOR ASSESSING VMT

In December 2018, OPR circulated its most recent *Technical Advisory on Evaluating Transportation Impacts in CEQA* that provides recommendations and describes various options for assessing VMT for transportation analysis purposes. The VMT analysis options described by OPR are primarily tailored towards single-use residential, office or retail projects. OPR recommends the following methodology and criteria for specific land uses:

- For residential projects, OPR recommends that VMT impacts be considered potentially significant if a residential project is expected to generate VMT per Capita (i.e., VMT per resident) at a rate that exceeds 85 percent of a regional or citywide average. ***Based on this OPR guidance: this report recommends that the VMT impact threshold for residential projects in Yountville should be 85 percent of the Yountville town average rate for VMT per Capita.***
- For office projects, OPR recommends that VMT impacts be considered potentially significant if an office project is expected to generate VMT per Employee at a rate that exceeds 85 percent of a regional average. This approach may also be applicable to other land use types in which in most trips are made by employees (not customers). ***Based on this OPR guidance: this report recommends that the VMT impact threshold for projects in Yountville in which most trips would be generated by employees (not customers) should be 85 percent of the Napa County average rate for VMT per Employee.***
- For retail projects, OPR recommends that VMT impacts be considered potentially significant if a project results in a net increase in total VMT. This approach considers the likelihood that retail developments may lead to increases or decreases in VMT, depending on previously existing retail travel patterns. This approach may also be used for other types of projects with customer components. ***Based on this OPR guidance: this report recommends that VMT impacts for retail and other customer-serving uses should be based on whether VMT attributable to customers will result in a significant net increase in VMT. In addition, retail projects generating fewer than 800 net VMT shall be considered insignificant in terms of impacts.***
- OPR does not provide specific guidance on evaluating other land use types, such as hotels, except to say that other land uses could choose to use the method applicable to the land use with the most similarity to the proposed project. ***Hotels are to be separated into two types of VMT generators; those on the employee component (which will use the Napa County average rate for VMT per employee to determine impacts) and the visitor component. Further discussion on the visitor component is in section 5.***
- For mixed-use projects, OPR describes several options that include (1) evaluating each land use separately; or (2) evaluating mixed-use projects based on the method applicable to the dominant land use. Evaluating each land use separately would potentially fail to measure the positive effects of mixed-use projects in reducing VMT.

4. VMT RATES IN YOUNTVILLE & NAPA COUNTY

The current rates of VMT per Capita and VMT per Employee in Napa County, are shown in **Table 1**, including the recommended impact thresholds for Yountville that would be based on 85 percent of the **Town** average for residential projects and 85% of **countywide** rate for employment projects. As shown: the rate of VMT per resident in Yountville is above the Countywide average, while that for VMT per employee is below the countywide average. Below the proposed impact thresholds.

Table 1: Napa County VMT Rates (Residential & Employment)

Jurisdiction	VMT per Capita (Residential)	VMT per Employee
American Canyon	17.00	31.37
Calistoga	9.82	16.96
Napa City	11.33	25.15
St Helena	9.16	17.41
Yountville	15.98	13.34
Napa Unincorporated	23.50	17.97
Highway 29 Corridor PDA	15.83	22.22
American Canyon PPA	16.91	19.99
Napa County Average	14.18	22.00
Recommended Impact Threshold (85% of Yountville or County average)	13.58	18.70

Source: NVTA Model & TJKM (2021).

5. RECOMMENDED VMT SCREENING CRITERIA

This section describes recommended VMT screening criteria for potential adoption by the Town of Yountville. VMT impacts may be presumed to be less than significant if a project meets screening criteria, consistent with OPR guidance summarized in **Table 2**. The screening criteria can be based on project size, land use and/or locational characteristics. If a project does not meet any of the screening criteria, then a detailed assessment of VMT attributable to a project would be required.

VMT for mixed-use projects can be considered for each use separately or evaluated for the project's dominant use. If the mixed-use project is composed entirely of any of the abovementioned low-VMT project types, then the project would be considered to have a less than significant impact on VMT.

Table 2: VMT Screening Criteria

Type of Project	OPR Recommended Screening Criteria	Recommended Screening Criteria for Town of Yountville
Small Projects	Projects that generate fewer than 110 motor vehicle trips per day	Same as OPR recommendation
Residential Uses in Low-VMT Areas	Residential projects located in low-VMT areas that do not exceed 85% of a regional or town-wide average for VMT per Capita (i.e., VMT per Resident)	Same as OPR recommendation (with threshold to be based on 85% of the town average)
Employment Uses in Low-VMT Areas	Office projects located in low-VMT areas that do not exceed 85% of a regional average for VMT per Employee ²	Same as OPR recommendation (with threshold to be based on 85% of the countywide average). In addition to office developments: this threshold would be applied to commercial projects in which most daily trips would be generated by employees (not customers)
Local-serving Retail	Retail projects of 50,000 sq. ft. or less.	Same as OPR recommendation
Hotel Projects in Low-VMT Areas	N/A ³	Hotels projects in areas where the rate of VMT per Employee does not exceed 85 percent of the Countywide average, provided that VMT attributable to hotel guests is not anticipated to result in a significant increase in total VMT.
Affordable Housing	100% affordable housing projects in infill locations.	Same as OPR recommendation
Projects in Proximity to Major Transit Stops	Projects that are located within a half mile of an existing or planned high-quality transit corridor ⁴ or major transit station, and: (1) is high density (minimum floor area ratio of 0.75), (2) does not exceed parking requirements, (3) is consistent with Plan Bay Area, and (4) does not replace affordable units with smaller numbers of moderate- or above moderate- income units.	Projects within one-half (0.5) mile of a transit stop with 15 minute or less headways, unless the project has a Floor Area Ratio (FAR) of less than 0.75, reduces the supply of affordable housing, or includes more parking than required under the zoning code.
Transportation Projects	Roadway, transit, bicycle, and pedestrian projects that do not lead to a measurable increase in vehicle travel.	Same as OPR recommendation

Source: OPR Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018, and TJKM, 2021.

² OPR recommendations are limited to residential, office and retail uses, and transportation projects.

³ OPR did not provide recommendations for assessing hotel VMT. The recommended methodology described in this report would assess VMT attributable to hotel employees based on the rate of VMT per Employee (similar to office uses) and would assess VMT attributable to hotel guests based on the effect of guest VMT on total VMT (similar to retail uses). Hotels typically re-route guest VMT from other lodging options, and therefore a hotel project may lead to increases or decreases in VMT attributable to hotel guests.

⁴ High Quality Transit Corridor is defined as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours per Public Resources Code Section 21155.

Small Projects

Small projects that are forecasted to generate fewer than 110 daily motor vehicle trips are generally considered to have a less than significant VMT impact, consistent with OPR Guidelines. Small projects meeting this screening criteria based on a trip generation forecast would not require further VMT analysis.

Residential & Employment Uses in Low-VMT Areas

Based on OPR guidance, residential or employment-oriented projects in low-VMT areas may be presumed to have less than significant VMT impacts and would not require further VMT analysis. The NVTA screening map tool shows low-VMT areas where residential or workplace VMT does not exceed 85 percent of the Countywide average:

- **Residential Uses:** Residential projects proposed for sites within the boundaries of areas with average rates of VMT per Capita that do not exceed 85 percent of the countywide average, as illustrated on **Figure 1**, can be assumed to have a less than significant VMT impact. Such projects would not require further VMT analysis, provided the proposed residential development provides similar multi-modal access provisions as existing residential development in the area.
- **Employment Uses:** Commercial projects where most daily trips would be generated by on-site employees (not customers), such as proposed office developments, can be presumed to have a less than significant VMT impact and would not require further VMT analysis if proposed for sites within areas with average VMT per Employee that does not exceed 85 percent of the countywide average (as illustrated on **Figure 2**). Such a project would not require further VMT analysis, provided the proposed development is similar in scale to existing employment uses.

If VMT generated by a project is not presumed to be less than significant based on the screening maps, it does not necessarily mean that the project would have a significant VMT impact, only that a less than significant VMT impact finding cannot be assumed without further analysis to make that determination.

Local-serving Retail Projects

Retail projects that are less than 50,000 square feet may be presumed to have a less than significant VMT impact. This is based on the OPR recommendations that VMT impacts associated with customer-serving uses should be based on whether the project results in a net increase in total VMT. OPR guidelines note that retail projects typically re-route travel from other retail destinations, and therefore a retail project may lead to increases or decreases in VMT, depending on previously existing travel patterns. Similarly, a large share of retail trips are “pass-by trips” that would not generate VMT attributable to a retail project.

Hotel Projects in Low-VMT Areas

Hotels projects in areas where the rate of VMT per Employee does not exceed 85 percent of the Countywide average (based on the NVTA screening tool as shown on Figure 2) may be presumed to have a less than significant VMT impact, provided that VMT attributable to hotel guests is not anticipated to result in a significant increase in total VMT.



Affordable Housing Projects

Affordable housing in infill locations generally improves jobs-housing balance, shortening commutes and reducing VMT. It is recommended that 100 percent affordable housing projects in infill locations be presumed to have a less than significant VMT impact, consistent with OPR guidance.

Transportation Projects

Types of transportation projects that are unlikely to lead to a measurable or substantial increase in vehicle travel may be presumed to cause a less than significant VMT impact. Such projects generally include:

- Transit and Active Transportation Projects
- Roadway Projects which decrease automobile capacity and/or increase priority of non-automobile modes such as transit, pedestrian, and bicycle travel

Figure 1 – Screening Map for Residential Uses (VMT per Capita)- Yountville

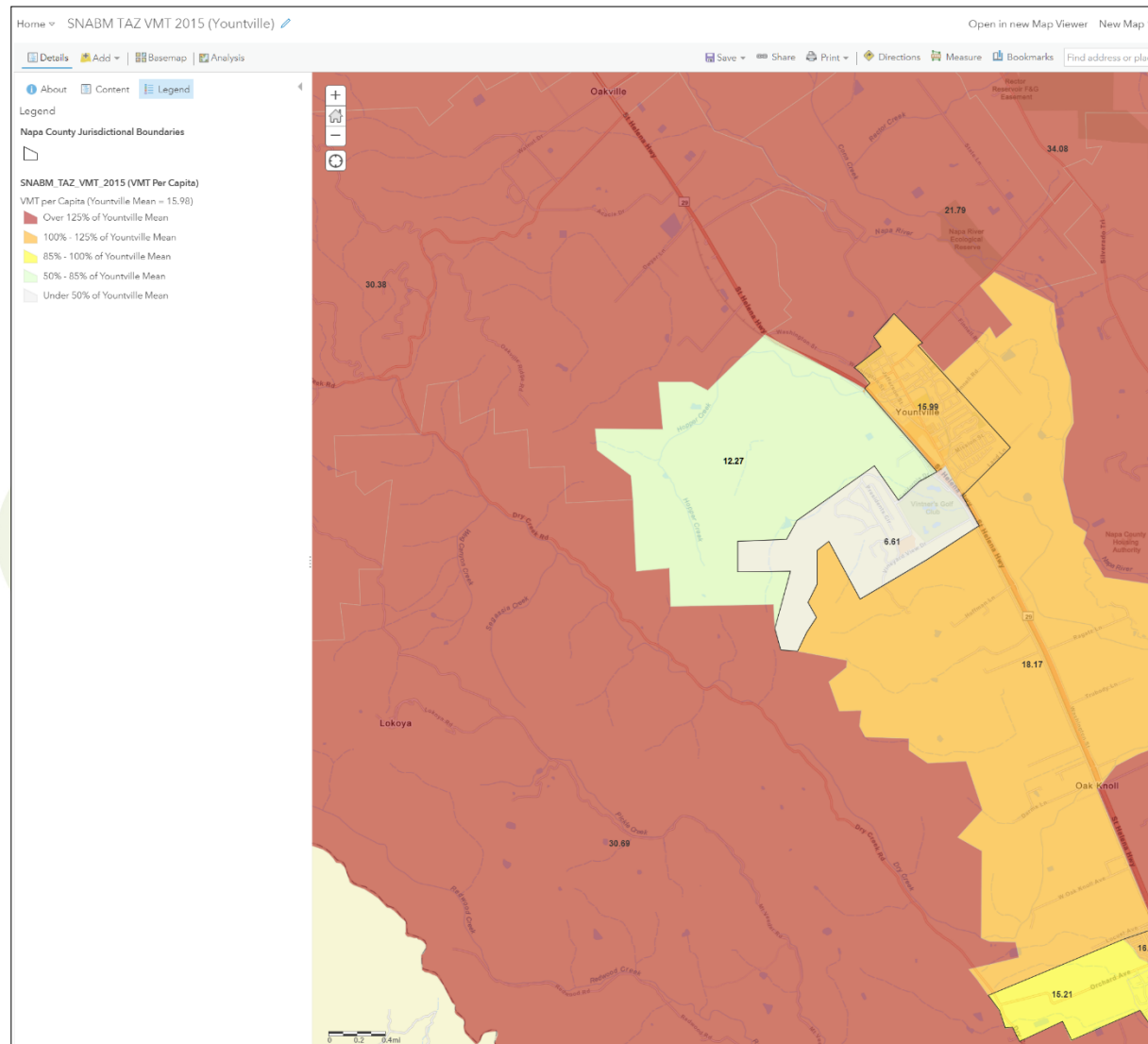
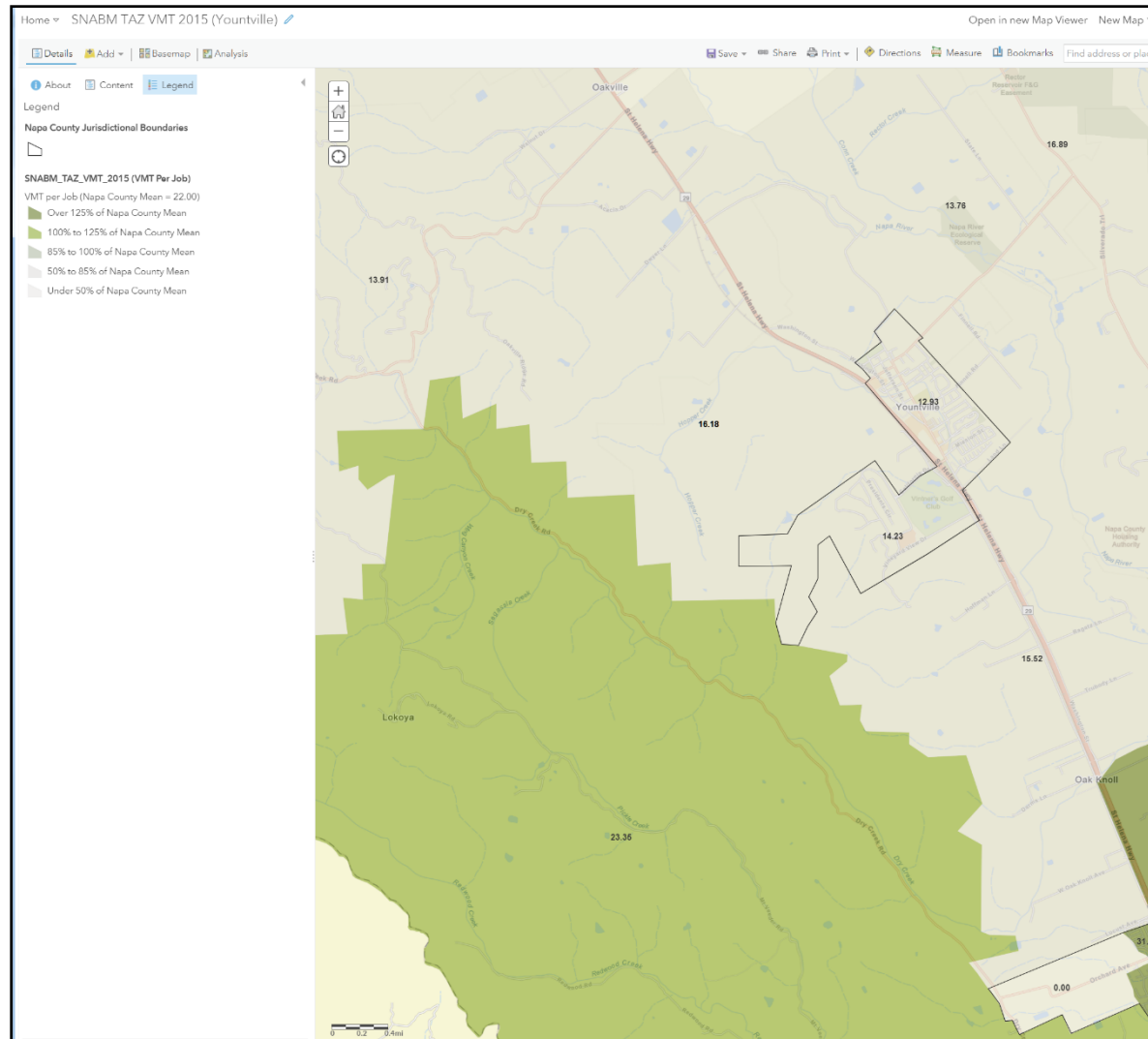


Figure 2 – Screening Map for Employment Uses (VMT per Employee)- Yountville



6. THRESHOLDS OF SIGNIFICANCE FOR VMT IMPACTS

When a project does not meet one of the screening criteria identified in the previous section, then a detailed VMT assessment would be required for projects subject to CEQA, to quantify the relevant VMT attributable to the project, provide findings of significance, and identify potential VMT mitigations where applicable.

The recommended significance thresholds, incorporating guidance described in the previous sections, are summarized on **Table 3** below.

Table 3: Recommended VMT Impact Thresholds for Town of Yountville

Type of Project	Threshold Calculation	Daily VMT Threshold
Residential	85% of town-wide average rate of VMT per Capita (i.e., VMT per Resident).	13.58 VMT per Resident
Office & Other Employment Uses (defined as uses in which most daily trips would be generated by employees)	85% of Countywide average rate of VMT per Employee	18.70 VMT per Employee
Retail & Other Customer-serving Uses (defined as uses in which most daily trips would be generated by customers)	Net change in total VMT.	Net increase in total VMT over 800 would be considered potentially significant (excluding employee VMT if the rate of VMT per Employee is below the threshold of 18.70 VMT per Employee).
Hotel	<p><u>VMT attribute to hotel employees:</u> 85% of Countywide average rate of VMT per Employee.</p> <p><u>VMT attributable to hotel guests:</u> net change in total VMT.</p>	<p>18.70 VMT per Employee</p> <p>Net increase in total VMT attributable to hotel guests would be considered potentially significant. However, hotel guests presumed to have no impact on VMT due to occupancy rates for existing hotels in the surrounding Yountville area.</p>
Transportation Projects	Net change in total VMT.	Net increase in total VMT would be considered potentially significant.

Source: TJKM, 2021.