



# City of Millbrae Vehicle Miles Traveled (VMT) Thresholds and Screening Policy

*Adopted by the City Council on January 23, 2024*

## INTRODUCTION AND BACKGROUND

On September 27, 2013, Senate Bill 743 (SB 743) was signed by then Governor Jerry Brown, requiring the Governor's Office of Planning and Research (OPR) to amend the California Environmental Quality Act (CEQA) Guidelines, to develop alternative metrics to replace the use of vehicular Level of Service (LOS) for evaluating transportation impacts, and to provide alternative criteria for evaluating transportation impacts to promote the reduction of Greenhouse Gas (GHG) emissions, the development of multimodal transportation systems, and a diversity of land uses.

Effective July 1, 2020, the SB 743 legislation required that local jurisdictions shift from the use of LOS for CEQA review of vehicle movement impacts (delay) to a method that assesses the distance of vehicle travel attributed to a project or use. This shift focuses review on regional traffic and reducing GHG emissions, rather than vehicle impacts on the local roadway network. With OPR's December 2018 'Technical Advisory on Evaluating Impacts in CEQA', the method selected to assess distance of vehicle travel is Vehicle Miles Traveled (VMT).

The City of Millbrae's Vehicle Miles Traveled Thresholds and Screening Policy (VMT Policy) is outlined below.

### **I. SCREENING CRITERIA FOR LAND USE PROJECTS**

The City/County Association of Governments of San Mateo County (the "C/CAG") Vehicle Miles Traveled Estimation Tool ("C/CAG VMT Estimation Tool") is designed to automate certain parts of the "screening" process to determine whether a detailed VMT analysis is required.

Under SB 743, it is assumed that some types of land use projects can be exempt from a Transportation Impact Analysis (TIA) based on project characteristics that contribute to an inherently less than significant impact on VMT. A less than significant impact on VMT may result from a project's location, size, or the land use of the development. A project only needs to meet one of four screening criteria to "screen out" of the requirement to complete a TIA under CEQA:

- 1) **Small Projects:** The project is small, and generates fewer than 110 daily vehicle trips
- 2) **Map Based Screening in areas with low VMT:** For Residential and Office projects located in an area where existing VMT per capita meets the VMT thresholds (e.g., 15% below existing rates of VMT if that threshold is selected)

- 3) **Affordable Residential Development:** The project consists of 100 percent (100%) affordable housing
- 4) **Projects Located Near Transit:** The project is located within ½ mile of high-quality transit (either a rail station, or a bus stop with service at least every 15 minutes during the AM and PM peak periods)

However, projects are not eligible for location-based screening (based on transit proximity or location in a low VMT area) if **any** of the following are true:

- The project is low density (<0.75 Floor Area Ratio (FAR)).
- The project provides more parking than is required by code or than indicated by current rates of demand as indicated by the current edition of the ITE Parking Generation Manual, whichever is higher.
- The project replaces existing affordable housing units with a smaller number of market rate units.
- The project is inconsistent with Plan Bay Area.

### **1) Small Projects:**

Absent substantial evidence that a project would generate a significant level of VMT, projects that generate less than 110 total trips per day may be assumed to cause a less-than significant transportation impact. In addition, the project must be consistent with the City's general plan and regional Sustainable Communities Strategy (Plan Bay Area).

#### *Small Projects: Office*

CEQA provides a categorical exemption for existing facilities, including additions up to 10,000 square feet, if the project is sufficiently served by public infrastructure and not in an environmentally sensitive area. Per ITE Trip Generation Manual (10<sup>th</sup> Edition), 10,000 square feet of building area utilized by the most common employment types of land use (offices) produce an estimated 110-124 daily trips.

#### *Small Projects: Residential*

It is also appropriate to use that trip count threshold as the screen for residential land uses. Small infill projects significantly served by public infrastructure are presumed to have a less-than significant impact. Therefore, employment and residential land uses that generate fewer than 110-124 daily trips are presumed to have a less-than-significant impact.

The criteria provided in Table 1 are based upon the ITE Trip Generation Manual and OPR recommended 110 daily trip thresholds.

**Table 1: Screening Criteria for Small Land Use Projects**

Land Use Type	Land Use Category	Threshold
Residential	Single Family Residential	12 dwelling units
	Multifamily Housing	20 dwelling units
	Affordable Housing	100% affordable
Employment Land Use	Office	10,000 square feet
	Industrial	22,000 square feet
Retail	Commercial	50,000 square feet

### **General Plan Land Use Consistency**

A land use project must show consistency with the General Plan Land Use Plan. Projects that are inconsistent with the Land Use Plan are automatically considered inconsistent with the VMT policy and shall conduct a VMT analysis. Table 1 provides a summary of VMT screening recommendations.

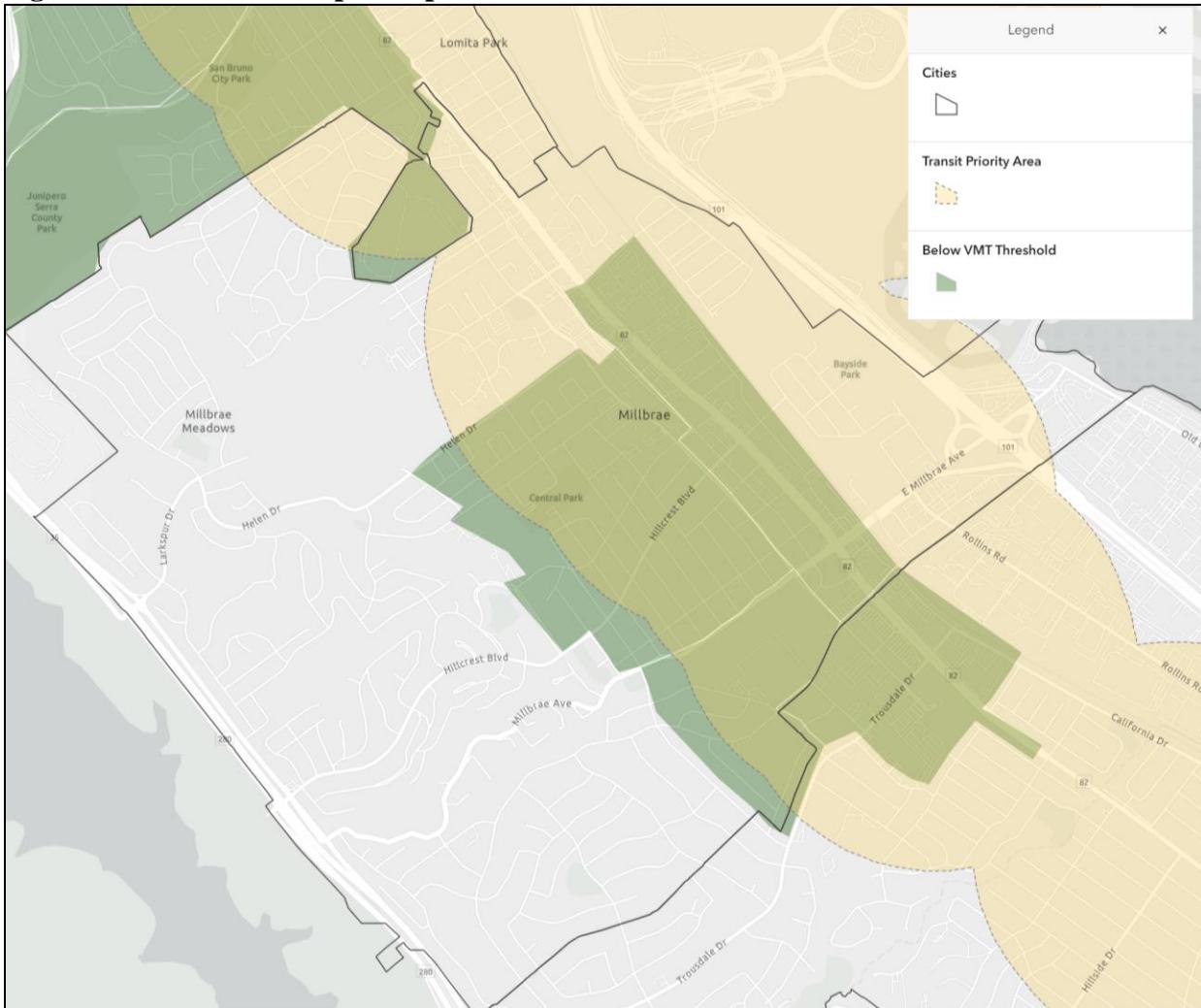
### **2) Map Based Screening:**

Map-based screens help to simplify VMT analysis by easily identifying projects that can presumably fall below the VMT thresholds of significance. Together the screens are intended to streamline development aligned with the implementation of General Plan development goals by removing the time and expense of complex Environmental Impact Reports (EIRs) when the transportation impacts can be presumed to not have a significant impact. This allows the development process to focus on other aspects of the project such as design and non-transportation impacts.

Land use projects must show consistency with the General Plan Land Use Plan. Projects that are inconsistent with the Land Use Plan are automatically considered inconsistent with the VMT policy and shall conduct a VMT analysis. Projects that are not likely to lead to a substantial or measurable increase in VMT and are presumed to be less than significant include, but are not limited to, the following:

- Projects located within prescreened areas on the VMT Screening Maps shown in Figure 1 (Resident VMT per Capita) and Figure 2 (Employee VMT per Employee).
- Project located within ½ mile of an existing major transit stop or an existing high-quality transit corridor.

**Figure 1: Resident VMT per Capita**



Source: [https://gis.smcgov.org/apps/CCAG\\_VMT\\_EstimationTool/](https://gis.smcgov.org/apps/CCAG_VMT_EstimationTool/)

**Residential Projects:** Figure 1 shows the Residential VMT Per Capita Screening Map that identifies areas in the City that are exempt from quantitative VMT analysis. These include sites that have been pre-screened through citywide VMT analysis using the latest City/County Association of Governments of San Mateo County (C/CAG) base year model. Pre-screened areas are shown in dark green and have been determined to result in 15 percent or below the regional average for VMT per capita established for that land use designation if built consistent with the General Plan Land Use Plan.

**Figure 2: Employee VMT per Employee:**



Source: [https://gis.smcgov.org/apps/CCAG\\_VMT\\_EstimationTool/](https://gis.smcgov.org/apps/CCAG_VMT_EstimationTool/)

**Office Projects:** Figure 2 shows the Employee VMT Per Employee Screening Map based on VMT per employee that identifies areas in the City that are exempt from quantitative VMT analysis. These include sites that have been pre-screened through citywide VMT analysis using the latest City/County Association of Governments of San Mateo County (C/CAG) base year model. Prescreened areas are shown in green and have been determined to result in 15 percent or below the regional average for VMT per capita established for that land use designation if built consistent with the General Plan Land Use Plan.

### **High Quality Transit Corridor**

A high-quality transit corridor is a fixed route bus corridor with service every 15 minutes or better during the peak commute period. OPR's Technical Advisory recommends that residential, retail, office, and mixed-use projects located within a half-mile of an existing major transit stop should be assumed to have less than significant impact on VMT.

For projects to be presumed to have a less than significant impact and be screened out of further VMT analysis, they must be located within half mile of eligible transit service (shown in yellow in Figure 2 and meet minimum criteria to support the presumption. Residential, employment, retail and other transit-compatible land use projects can be presumed to have a less than significant impact if they are located within a half mile of a major transit stop or high-quality transit corridor. To qualify, no more than 25 percent of all of the project's parcels can be further than one-half mile from the stop or corridor. For residential projects, no more than 10 percent of the residential units, or 100 units, whichever is less, can be further than one-half mile from the stop or corridor. Additionally, the project must meet the baseline criteria presented below:

**Density:** For residential projects, a minimum of 20 units per acre (or maximum allowed if zoned at a lower density). For commercial or employment land use the minimum density is a floor area ratio of 0.75 (or maximum allowed if zoned at a lower density). Minimum density is required to ensure that projects are transit supportive and would result in low VMT. Projects can propose a higher density than the minimum required if the zoning and other plans allow for higher density.

**Parking Supply:** Projects are ineligible for screening if they provide more parking than indicated by current rates of demand or as indicated by the current edition of the ITE Parking Generation Manual, whichever is higher. Excess parking supply is associated with induced and higher levels of VMT and should be avoided to ensure low VMT of screened projects.

**Regional Plans:** Projects must be consistent with Plan Bay Area as determined by the lead agency. The proposed land use should be compatible with the regional plan, an example of an incompatible project would be screening a development in an area that is identified as open space in Plan Bay Area.

**Displacement:** Projects that replace affordable residential units with a smaller number or higher income residential units cannot be eligible for screening. Removing affordable units can increase the VMT of the former residents.

### **3) Affordable Housing:**

OPR's Technical Advisory provides evidence to support a presumption of less than significant impact for 100 percent affordable residential projects in infill locations. Therefore, 100 percent affordable housing projects may be screened out from further VMT analysis.

### **4) Projects Located Near Transit Corridor:**

Projects located near transit are defined as projects located within ½ mile of a high-quality transit service (defined as a rail station or a bus stop with a line providing service at least every 15 minutes during peak hours). Residential, retail, office, and mixed-use projects located within a half-mile

of an existing major transit stop should be assumed to have less than significant impact on VMT. In addition, a project shall be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor. These projects do not require further VMT analysis.

## **II. SCREENING CRITERIA FOR TRANSPORTATION PROJECTS**

The City will conduct an initial assessment to determine if the proposed transportation project is likely to substantially increase VMT, as determined by the City Engineer. Projects that typically do not substantially increase VMT may be subject to quantitative (or qualitative) analysis that considers the effects of induced travel, as determined by the City.

Projects that are not likely to lead to a substantial or measurable increase in VMT include, but are not limited to, the following:

- Public transit (establishing new routes or services or modifying existing routes or services)
- Addition of active transportation improvements (class II bicycle lanes, shared use paths sidewalks, pedestrian pathways)
- Addition of roadway capacity on local and collector roadways only provided for the purpose of improving conditions for pedestrians, cyclists, and transit users
- Resurfacing, rehabilitating, maintenance, preventive maintenance, replacement, and repair projects that do not add additional roadway capacity
- Installation, removal, or modification of turn lanes
- Installation, removal, or modification of traffic control devices, including traffic signals, wayfinding, HAWK, RRFB and traffic signal priority systems
- Traffic signal optimization and or coordination to improve vehicle, bicycle, or pedestrian flow
- Installation of roundabouts
- Installation or modification of traffic calming devices
- Lane reductions (i.e., road diets)
- Addition of auxiliary lanes that do not add additional roadway capacity
- Removal of off-street parking and addition, adoption, or modification of parking devices and management strategies
- Safety improvements, including roadway shoulder enhancements and auxiliary lanes, and grade separations for rail, transit, pedestrian, and bicycle facility enhancements
- Sidewalk infill, removing barriers to accessibility, and ADA improvements
- Installation or modification of access control restrictions
- Complete streets projects that do not add additional roadway capacity
- Other improvements to the circulation system that do not add additional roadway capacity

## **III. PROJECT IMPACT ANALYSIS – FORECASTING VMT**

VMT is typically calculated and forecasted using a travel demand model. Using a travel demand

model is typically preferred over other methods because the travel model is better able to account for both project generated VMT and the project's effect on total area wide VMT, both of which are important in a CEQA analysis. The OPR Technical Advisory recommends that the method used to define a VMT threshold should be the same method that is used to evaluate a project's VMT against that threshold.

The City has elected to use [C/CAG's VMT Estimation Tool](#). Large projects that have a VMT per capita or VMT per employee above the threshold would trigger a VMT impact, therefore the use of the C/CAG VMT Estimation Tool is most appropriate. This tool is a web-based application to support local jurisdictions in San Mateo County and can help with conducting baseline VMT screening and VMT reduction analysis for specific land use projects.

A model run may still be appropriate to calculate total VMT and VMT on local roadways for use in the Greenhouse Gas and Air Quality CEQA topic areas.

#### **IV. VEHICLE MILES TRAVELED IMPACT SIGNIFICANCE THRESHOLDS**

Pursuant to Section 21099 of the Public Resources Code, the criteria for determining the significance of transportation impacts must promote the reduction of Greenhouse Gas (GHG) emissions, the development of multimodal transportation systems, and a diversity of land uses. The following land use projects would have a significant impact on the environment if:

**Residential:** The home-based VMT per resident generated by the project is more than 15 percent (15%) below the nine-county Bay Area regional average or citywide average<sup>1</sup> home-based VMT per resident.

- **Office/Employment:** The home-based-work VMT per worker generated by the project is more than 15 percent below the nine-county Bay Area regional<sup>2</sup> average home-based-work VMT per worker.
- **Retail and Other Land Uses:** The project results in a net increase in VMT within its sphere of influence.

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<sup>1</sup> OPR's guidance notes that City's may select the citywide average baseline value applies until such time that a City exceeds the housing allocation for the City as identified in the Sustainable Communities Strategy (SCS) for the Bay Area region, which is Plan Bay Area 2050; if a City exceeds the SCS housing allocation, the nine-county Bay Area regional average should apply.

<sup>2</sup> OPR Guidance notes that, "In cases where the region is substantially larger than the geography over which most workers would be expected to live, it might be appropriate to refer to a smaller geography, such as the county, that includes the area over which nearly all workers would be expected to live." If this approach is selected, substantial evidence, such as market or other travel studies, would be required to substantiate this.

**Table 2: Criteria for Significant Impacts**

Element of Impact Criteria	Adopted Metric
Threshold: VMT Reduction from Baseline	15% Below Baseline VMT per Capita (2015)
Threshold: Project Effect on VMT	No increase in Regional VMT
Baseline	2015 Regional Average (Region: MTC 9-County Region)
<b>Thresholds to Apply to Individual Land Use Types (unless screened out per the screening section in the policy)</b>	
Residential	Per Capita VMT Reduction from Baseline
Office / R&D / Light Industrial	Per Capita VMT Reduction from Baseline
Retail	Project Effect on regional VMT
Hotels	Project Effect on VMT (qualitative)
Schools	Project Effect on VMT (qualitative)
Entertainment / Tourism	Project Effect on VMT (qualitative)

## **V. VMT MITIGATION**

If a development does not screen out and requires mitigation under CEQA, the traffic study should include an assessment of possible VMT reduction strategies to help a development meet their VMT goal. VMT mitigation requires reducing the number and distance of vehicle trips generated by a particular project.

VMT impact mitigation strategies generally take the form of Transportation Demand Management (TDM) measures. TDM measures include strategies related to parking, transit usage, encouraging a mix of land uses on site, and promoting the use of active transportation and higher occupancy vehicle models (e.g., carpooling and transit). TDM can be applied on a project-by-project basis, or on a community-scale as part of off-site mitigation through a city, county, or regional VMT mitigation program. Unless a program is established, most projects that result in VMT impacts would need to apply TDM strategies on a project-by-project basis.

Lead agencies must demonstrate the effectiveness of the selected mitigation strategies. The California Air Pollution Control Officers Association (CAPCOA) handbook ([https://www.caleemod.com/handbook/full\\_handbook.html](https://www.caleemod.com/handbook/full_handbook.html)) is a preferred tool that can quantify VMT reductions. Using the latest research, handbook authors outline different VMT mitigating measures and how to estimate their predicted effectiveness.

Table 3 below summarizes the tools that development and transportation projects should use to mitigate VMT impacts.

**Table 3: VMT Mitigation Approach**

Project Type	Tool
Land Use: Residential and Employment Uses	CAPCOA
Land Use: Other projects	CAPCOA
Transportation projects: Capacity increasing (vehicle capacity reducing projects are generally screened out)	Caltrans guidance

**Review of VMT Mitigation Strategies**

Table 4 summarizes *potential* measures to mitigate VMT impacts for development and transportation projects.

**Table 4: Potential Measures to Mitigate VMT Impacts**

CAPCOA 2021 ID	VMT Reduction Measure	Type of VMT Affected	Score
<b>Land Use – Higher Effectiveness</b>			
T-1	Increase Residential Density	Project-generated trips	1
T-2	Increase Job Density	Project-generated trips	2
T-3	Provide Transit-Oriented Development	Project-generated trips	1
T-4	Integrate Affordable and Below Market Rate Housing	Project-generated trips	1
T-17	Improve Street Connectivity	All neighborhood/city trips	1
<b>Trip Reduction Programs – Medium Effectiveness</b>			
T-5, T-6, T-7	Implement Commute Trip Reduction Program	Employee commute trips	1
T-8, T-11	Providing Rideshare and Vanpool Programs	Employee commute trips	1
T-9	Implement Subsidized or Discounted Transit Program	Employee commute trips	1
T-10	Provide End-of-Trip Bicycle Facilities	Employee commute trips	1
T-12	Price Workplace Parking	Employee commute trips	1
T-13	Implement Employee Parking Cash-Out	Employee commute trips	1
T-23	Community-Based Travel Planning	Household trips	1

CAPCOA 2021 ID	VMT Reduction Measure	Type of VMT Affected	Score
			1 - most applicable 2 - somewhat applicable 3 - least applicable N/A
<b>Parking or Road Pricing/Management – Medium Effectiveness</b>			
T-15	Limit Residential Parking Supply	Project-generated trips	1
T-16	Unbundle Residential Parking Costs from Property Cost	Project-generated trips	1
T-24	Implement Market Price Public Parking (On-Street)	All neighborhood/city trips	1
<b>Neighborhood Design – Lower Effectiveness</b>			
T-18	Provide Pedestrian Network Improvements	Household trips	1
T-19-A, T-19-B, T-20	Construct or Improve Bike Facilities	All neighborhood/city trips, Employee commute trips	1
T-21-A	Implement Carshare Program	All neighborhood/city trips	1
T-22-A, T-22-B, T-22-C	Implement Bikeshare or Scootershare Program	All neighborhood/city trips	1
<b>Transit – Lower Effectiveness</b>			
T-25, T-26	Extend Transit Network Coverage, Hours, or Frequency	All neighborhood/city trips	3
T-27	Implement Transit-Supportive Roadway Treatments	All neighborhood/city trips	1
T-28	Provide Bus Rapid Transit	All neighborhood/city trips	3
T-29	Reduce Transit Fares	All neighborhood/city trips	3

## **VI. NON-CEQA TRANSPORTATION ANALYSIS**

LOS may be used to inform local analysis, such as traffic operations and traffic signal timing needs during the development review process, outside of the CEQA review. Project conditions of

approval (COA) can require changes to the project, transportation demand management (TDM) strategies, or other measures to address LOS analysis outside of CEQA. Project COA cannot induce vehicle travel or increase VMT, both of which are impacts that conflict with SB 743. The City of Millbrae will also continue to implement General Plan policies where Level of Service applies:

- M-1.12: Measuring Vehicle Level of Service
- M-1.13: Maintain Traffic Level of Service
- M-1.14: Establish VMT Threshold
- M-1.15: Transportation Studies for New Development