



MEMORANDUM

DATE: August 4, 2020

TO: Todd Smith | Sacramento County

FROM: Benjamin Rady and David Tokarski | DKS Associates

SUBJECT: NewBridge Specific Plan Revised VMT Analysis

Project # 13049-000

Pursuant to Senate Bill (SB) 743, transportation impacts under CEQA may no longer be measured with automobile delay and level of service (LOS) post July 1, 2020. CEQA guidelines (Section 15064.3) state that vehicle miles traveled (VMT) is generally the most appropriate metric for determining transportation related impacts under CEQA. While VMT was previously calculated for the proposed NewBridge development traffic impact analysis, the applied methodologies were not consistent with recently adopted guidance from Sacramento County. The purpose of this technical memorandum is to document revised VMT calculations that are consistent with the County's Transportation Analysis Guidelines published July 1, 2020.

VMT metrics associated with the residential components (VMT per capita) and commercial (office) components (VMT per employee) of the project are summarized herein. This memorandum also summarizes the County's thresholds, which are based on regional averages calculated from the travel demand model. The project's VMT-reducing features and mitigations are also documented.

The Governor's Office of Planning and Research (OPR) VMT Guidelines do not require VMT analysis as a measure of significance for Draft EIR documents published prior to July 1, 2020. As the NewBridge Draft EIR was published in advance of this date, the analysis presented in this Memorandum is intended to be informational.

VMT REDUCTIONS ASSUMED AS PART OF THE PROJECT

Residential VMT per capita and office VMT per employee associated with the NewBridge development exceed the County's VMT thresholds, which are defined as 85 percent of the respective regional average. Exceedance of either of these metrics indicates a transportation impact for projects subject to CEQA after July 1, 2020. The project has identified feasible VMT reduction measures that substantially reduce the project's impact. The following VMT reduction strategies have been defined as part of the project and include strategies identified in the County's Transportation Analysis Guidelines and the California Air Pollution Control Officers Association (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures report.

MODELED VMT REDUCTION MEASURES

The NewBridge project has several VMT reduction measures that have been incorporated into the project design or are required by the Air Quality Mitigation Plan, the GHG Reduction Plan, or the project’s Development Agreement. These VMT reducing features are already reflected in the “with-project” scenario and will not be double-counted when determining the effectiveness of additional VMT reduction strategies.

The following project VMT reductions from the CAPCOA *Quantifying Greenhouse Gas Mitigation Measures* report are assumed as part of the project description and are included in the model (numbering is presented for informational purposes):

- Consistency with County General Plan Policy LU-120;
- Provides 1,110 multi-family units (36.1 percent of housing stock) in densities greater than 23 units per acre (LUT-1);
- Overall density of 9.6 dwelling units per acre (LUT-1);
- Bicycle connections throughout site and with surrounding developments (LUT-8);
- Designed consistent with SACOG Blueprint principles and the sustainability and transportation principles of the MTP/SCS;
- Transit facilities complementary to the bus rapid transit routes planned on Jackson Road and Sunrise Boulevard, including transit routes and stops (LUT-5, TST-1, TST-2, and TST-3);
- All residential units are planned within one mile of three amenity categories (public elementary school, parks, and commercial center) (LUT-3);
- 93 percent of the residential units would be within one mile of a fourth amenity category (community garden) (LUT-3);
- 81 percent of the residential units would be within one mile of the office/office employment center (LUT-3);
- Increased diversity via mix of uses (LUT-1);
- 96 percent of the residential units would be within one-half mile walk of a planned transit stop (LUT-5 and TST-2); and
- Project site is within five miles of approximately 62,276 existing jobs in the area, as well as proposed employment uses within project area.

OFF-MODEL VMT REDUCTION MEASURES

In addition to the CAPCOA strategies listed above, several VMT reducing measures have been assumed as part of the project definition/design. These project “features” are not amenable to quantification through travel demand modeling. Although these VMT reduction measures may reduce project VMT, they are not reflected or considered as mitigation for the project.

The following CAPCOA reduction measures are assumed as part of the project design or required by the Air Quality Mitigation Plan, the GHG Reduction Plan, or the project’s Development Agreement, but are not included in the “with project” models:

- Implementation of Transportation System Management (TSM) Plan projects (TRT-1);

- Pedestrian connections throughout site and with surrounding developments (SDT-1);
- Bicycle parking near transit facilities complementary to the bus rapid transit routes planned on Jackson Road and Sunrise Boulevard (TST-5)

VMT ANALYSIS

Following the County's Transportation Analysis Guidelines, the applicable metrics are VMT per capita for residential land uses and VMT per employee for commercial (office) and industrial uses. The project's VMT per capita and VMT per employee should be compared to a threshold of 85 percent of the regional average for each metric. Regional averages are calculated in this memorandum to be consistent with SACOG's SACSIM15 travel demand model, which was used for all of the project's transportation analysis.

County guidelines require that each land use be analyzed separately when identifying impacts. The residential, employment, and retail land uses of the project are discussed below.

RESIDENTIAL COMPONENTS (VMT PER CAPITA)

For residential land uses, VMT per capita is the operative metric for CEQA impact analysis. It includes all vehicle tours (both work/commute vehicle tours and non-work vehicle tours) that start and end at a residence. Home-based tours reflect travel for work, school, recreation, and shopping, but exclude travel that begins and ends away from the home location.

An example of a work/commute vehicle tour that is captured in the VMT per capita calculation may start at a residence, include a stop to drop a child off at school and a stop to pick up dinner before returning to the residence. A non-work vehicle tour starts that begins and ends at home may also include intermediate stops. VMT from these tours must include full mileage of the entire tour, including all stops.

VMT per capita is calculated by first combining VMT from home-based tours generated throughout the day at a residential unit. The home-based VMT for all residential units in the project area is summed and divided by the total resident population of the project, resulting in the project's VMT per capita.

Table 3-3 of the County's Transportation Analysis Guidelines identifies the threshold of significance as 85 percent of the baseline (no project) regional average VMT per Capita. If the regional VMT per capita from the residential component of the "with-project" model runs exceeds this threshold, the project is determined to require VMT reduction.

OFFICE COMPONENTS (VMT PER EMPLOYEE)

For non-residential land uses, VMT per employee is used to evaluate commercial (office) and industrial VMT. It includes all commute vehicle tours that begin and end at an employment location. A commute tour may include intermediate stops. An example commute tour begins at a

residence, includes a stop to drop a child off at school, includes a stop for breakfast, and ends at a place of work.

VMT for commute tours are summed to the employment location of each tour. The commute VMT for all employment locations in the project area is summed and divided by the total employment of the area.

All office land uses in NewBridge are included in a single transportation analysis zone (TAZ). As such, office VMT per employee is calculated based on results from that TAZ. There are no screening criteria applicable to the office land uses in NewBridge.

Results from the “with-project” model runs were compared to the baseline (no project) results to determine if the project’s office component exceeds 85 percent of the regional average VMT per Employee, per Table 3-3 of the County’s Transportation Analysis Guidelines.

RETAIL VMT ASSESSMENT

The County distinguishes between local and regional serving retail land uses. Local serving retail is defined as having up to 200,000 square feet of total gross floor area in growth areas, or with a market area of 3 miles or less. Retail land use designations within NewBridge were determined to fit within the local serving retail definition. County staff were consulted and confirmed that all retail uses in NewBridge are considered local serving and therefore screened from further VMT analysis.

VMT ANALYSIS RESULTS

Table 1 shows the results for SACSIM15 VMT per capita and VMT per employee with- and no-project under Existing and CEQA Cumulative conditions. The percent of the region column refers to the change in VMT between the “no project” and “with-project” model results. Any “with-project” result over 85% may be considered an impact per the County’s Transportation Analysis Guidelines.

TABLE 1: VMT ANALYSIS RESULTS

	VMT PER CAPITA	% OF REGION	VMT PER EMPLOYEE	% OF REGION
EXISTING REGION	17.9	100%	19.1	100%
EXISTING THRESHOLD OF SIGNIFICANCE	15.2	85%	16.3	85%
EXISTING PLUS NEWBRIDGE	22.0	123%	25.2	132%
CEQA CUMULATIVE REGION	17.2	100%	17.3	100%
CEQA CUMULATIVE THRESHOLD OF SIGNIFICANCE	14.6	85%	14.7	85%
CEQA CUMULATIVE NEWBRIDGE	18.5	108%	22.2	129%

Note: Bold cells exceed County standard of significance (greater than 85% of regional average).

Source: DKS Associates, 2020.

Results indicate that the NewBridge project VMT per capita and VMT per employee exceed the County's draft significance threshold under both the Existing and CEQA Cumulative scenarios. In all cases, the project is expected to generate VMT greater than the regional average threshold.

MITIGATION MEASURES

VMT reducing measures considered part of the project definition/design do not reduce project VMT to an acceptable level. In addition to these design features, the project applicant will adhere to previously mitigation measures identified in the FEIR (TC-3 and TC-4 below), participate in Transportation Demand Management employer-based trip reduction services, and participate in an active benefit zone of County Service Area Number 10 to implement transportation-related services that would reduce vehicle trips.

MITIGATION MEASURE TC-3: BICYCLE AND PEDESTRIAN SYSTEM IMPLEMENTATION

Future development within the NewBridge Specific Plan (NSP) shall implement the proposed bicycle and pedestrian path/trail system as described in the NewBridge Specific Plan and Design Guidelines. Before approval of any tentative map, future projects within the NSP shall be coordinated with Sacramento County to identify the design-level details of necessary on- and off-site pedestrian and bicycle facilities to serve the proposed development and which would ensure bicycle and pedestrian safety. These facilities shall be incorporated into subsequent projects and could include sidewalks, stop signs, standard pedestrian and school crossing warning signs, lane striping to provide a bicycle lane, bicycle parking, signs to identify pedestrian and bicycle paths, raised crosswalks, pedestrian signal heads, and all appropriate traffic calming measures as defined in the County's Neighborhood Traffic Management Program (NTMP). Sidewalks would be required

as part of the frontage improvements along all new roadway construction in the project vicinity in conformance with County design standards. Circulation and access to all proposed public spaces shall include sidewalks that meet Americans with Disabilities Act standards.

MITIGATION MEASURE TC-4: TRANSIT SYSTEM

The project applicant shall coordinate with Sacramento County and Sacramento Regional Transit District (or other transit operators) to provide the additional transit facilities and services assumed in the transportation analysis, or a cost-effective equivalent level of transit facilities and services. Ultimate transit service consists of 15-minute headways during peak hours and 30-minute headways during non-peak hours on weekdays. The implementation of the transit routes and service frequency must be phased with buildout of the project and the ultimate service will be required at full development of the project. This shall be accomplished through the annexation to County Service Area 10 (CSA-10) or formation of a transportation services district. Such annexation or formation shall occur prior to recordation of any final small lot subdivision map for the project.

TRIP REDUCTION SERVICES

Trip Reduction Services (TRS) are an important part of the NSP, the NSP Air Quality Mitigation Plan, and compliance with the County General Plan Policy LU-120. The USP identifies the costs of implementing and operating the TRS necessary to meet these goals and policies and recommends a financing mechanism for the identified services for approval by the County. The NewBridge project may include additional services that are above the required services and include and finance said services with the same program.

NewBridge shall cooperate with the County in establishing a special financing mechanism for the project area to fund the TRS described in, and consistent with, the Approvals for the NSP, the NSP Air Quality Mitigation Plan, the Urban Services Plan (USP), and the PFFP. Such financing mechanism shall be established and the resulting annual service charge, fee or tax or other mechanism shall be imposed on each residential unit and non-residential unit to fund all aspects of the TRS, including, but not limited to, capital, maintenance, and operational costs. This mechanism shall be approved prior to the recordation of the first final small lot subdivision map or issuance of any building permit within the project area, whichever may occur first. Grading permits may be issued within the project area prior to implementation of the financing mechanism.

The TRS shall be provided to the residents and non-residential uses within the project area. TRS shall be phased as development occurs and supported by transit funds generated from the project as it builds out such that services are available to establish trip reduction behavior within NSP phases. TRS may include, but shall not be limited to, including membership in a transportation management association, commute trip reduction, transit services, transit improvements, rideshare matching and vanpool coordination, commuter financial incentives, telework and/or flextime support, guaranteed ride home programs, parking management, shared parking coordination,

special event transport management, transportation access guides, wayfinding, and multi-modal navigation tools.

The County acknowledges that recent advancements in technology and transportation network companies have occurred subsequent to the adoption of the 2030 General Plan policies requiring provision of transit service. The goal of TRS is to improve air quality and reduce greenhouse gas emissions by encouraging alternate modes of travel. Alternatives to the TRS may be considered by the County if it can be demonstrated that an equivalent reduction in vehicle miles traveled or transportation mode split, as documented in the NSP transportation impact study, can be achieved.

CSA 10 ANNEXATION INTO OR FORMATION OF BENEFIT ZONE

County Service Areas are the County's proposed financing mechanisms for TRS'. County Service Area Number 10 (CSA 10) was established to mitigate air quality impacts of new development by implementing transportation-related services that would reduce vehicle trips. CSA 10 is coextensive with the portions of the unincorporated county within the urban services boundary (USB), with the exception of Cordova Hills Special Planning Area, which is within County Service Area Number 13 (CSA 13).

Benefit Zone No. 3 (Zone 3) was formed in June 2006 to include the North Vineyard Station Specific Plan Area and is presently the only active CSA 10 benefit zone. Annexations to Zone 3 occurred in December 2013 and August 2015 to include the Florin Vineyard Community Plan and Wildhawk North development areas. Rezone Condition of Approval No. 89 for Easton requires annexation to an active zone of CSA 10. In March 2020, Board of Supervisors approved a proposal to create Benefit Zone No. 4 (Zone 4) to encompass Easton Place and Glenborough at Easton, which will take effect after approval of the property owners.

The formation of a benefit zone requires an Engineer's Report describing the services to be funded and appropriate service charges. Service charges are based on dwelling unit equivalent (DUE) rates for both residential and non-residential development and assessed annually with the collection of property taxes. The services to be provided by CSA 10 for an active benefit zone are intended to serve exclusively the users associated with properties within the benefit zone. Services may be contracted through a transportation management association (TMA) and may include:

- Transit Shuttles — shuttles for residents and/or employees between residential areas, employment centers, shopping and service centers and light rail stations and/or other public transit options;
- Guaranteed Rides Home — free taxi rides or rental cars for ride sharers in case of an emergency;
- Subsidies — financial assistance to encourage residents and employees to use transit or other alternative transportation measures, such as alternative fuel vehicles;
- Transportation Plans — plans which guide employers and resident groups on the implementation of trip reduction programs such as ride share matching and vanpools;
- Education Programs — various programs such as education of transit options, home office set up, alternative commute opportunities, and walking/bicycling programs for schoolchildren;

- Infrastructure Support — additional bike racks and lockers, transportation alternative and ride share informational boards/kiosks, transit facilities;
- Transportation Coordinator Training and Support — instruction in mobility (transportation alternatives) for residential groups and work site coordinators.

The NewBridge project proposes to provide many of the above listed services as a mitigation measure, through the Air Quality Mitigation Plan, the GHG Reduction Plan, or the Development Agreement. Funding would be provided through annexation into, or formation of, an active benefit zone of CSA 10 (or similar non-revocable funding mechanism).

It should be noted that many of the services provided by CSA 10 overlap with VMT reduction strategies in the SB 743 technical advisories and implementation guidance from OPR. This is because VMT is a proxy for GHG emissions. The project's commitment to participate in an active benefit zone of CSA 10 for air quality and GHG mitigation will necessarily result in VMT reductions.

CONCLUSIONS

The results from Table 1 indicate that the NewBridge project is expected to generate more than the 85% of regional average threshold for both VMT per capita and VMT per employee metrics. In all but one case, the project generates VMT greater than 30% of the threshold. The CAPCOA guidance recommends that the additive effect of VMT reducing measures not exceed 30% in suburban locations. While there are several design features of the project intended to reduce VMT, VMT per capita and VMT per employee cannot be sufficiently reduced to the County's draft threshold.

It is therefore recommended that the project implement all VMT reducing measures identified as part of the project and identified in the Air Quality Mitigation Plan, the GHG Reduction Plan, and the Development Agreement. NewBridge will also cooperate with the County in establishing a non-revocable financing mechanism for the project area to fund the TRS by seeking annexation into, or the formation of, an active benefit zone of CSA 10.