



COUNTY OF HUMBOLDT

For the meeting of: 4/17/2025

File #: 25-538

To: Planning Commission

From: Planning and Building Department

Agenda Section: Departmental Report

SUBJECT:

Adopt a Vehicle Miles Traveled Policy by Resolution for CEQA Threshold and Screening Criteria
Assessor Parcel Numbers (APN) 000-000-000
Record No.: LRP-2023-18792
Unincorporated Humboldt County.

Recommend that the Board of Supervisors adopt by resolution a policy establishing a Humboldt County Vehicle Miles Traveled (VMT) CEQA threshold of significance and screening criteria for new development projects, to comply with California Senate Bill 743.

RECOMMENDATION(S):

That the Planning Commission take the following actions:

1. Adopt the resolution [Attachment 1] recommending that the Humboldt County Board of Supervisors take the following action:
 - a) Find that the proposed policy for VMT threshold is not a project pursuant to Sections 15060(c)(3) and 15378 (b)(5) of the State CEQA Guidelines; and
 - b) Adopt the proposed VMT Threshold Policy Guidelines [Attachment 2] establishing thresholds of significance and screening criteria for the purpose of analyzing VMT transportation impacts under CEQA.

DISCUSSION:

Executive Summary:

The Planning Commission is being asked to provide a recommendation to the Board of Supervisors on a policy document establishing thresholds for Vehicle Miles Traveled (VMT). In 2020 legislation (SB 743) took effect that changed traffic impact analysis from the traditional Level of Service analysis (LOS) to VMT. Under this legislation, the County has the discretion to devise VMT thresholds of significance to assess projects under CEQA or continue to evaluate a project's transportation impacts on a case-by-case basis. Adopting standardized thresholds and screening criteria provides a consistent and repeatable format for transportation impact analysis, and increases VMT reduction for the

County. The proposed thresholds and screening criteria outlined in the VMT Policy Threshold Guidelines, or “Policy Guidelines” (Attachment 2) are based upon the Humboldt County VMT Study prepared by Fehr & Peers Traffic Consultants (Attachment 3), and the Office of Land Use and Climate Innovation (LCI) Technical Advisory on Evaluating Transportation Impacts in CEQA, or “Technical Advisory” (Attachment 4). The proposed VMT threshold of significance is fifteen percent or more below existing VMT. Projects that screen out would not require a detailed VMT analysis or mitigation, whereas other projects not screened out would require a detailed VMT analysis, and some form of mitigation if found to be above the threshold.

Background:

SB 743 required agencies to use VMT for analyzing projects’ transportation impacts over Level of Service (LOS) starting July 1, 2020, and CEQA Guidelines Section 15064.3 specifies that automobile delay under LOS, or similar measure of traffic congestion, is no longer considered a significant impact. The intent of SB 743 is to ensure that the environmental impacts of traffic (such as noise, air pollution, and safety concerns) continue to be properly addressed and mitigated through CEQA with the use of VMT, and to balance the needs of congestion management more appropriately with statewide goals related to the reduction of greenhouse gas emissions and traffic-related air pollution. This is being accomplished through the promotion of infill development, increasing multi-modal transportation and public health through active transportation. While projects are no longer reviewed for LOS under CEQA, LOS is still a standard in the Circulation Element of the General Plan and projects will need to continue to be reviewed for consistency with these standards.

LOS has been historically used to measure traffic congestion levels on intersections and roadways, and to assess the impacts of new development projects on automobile delay. In the context of Humboldt County, which is largely rural in nature and widespread with primarily low-density development, achieving a less than significant impact on transportation using LOS has been unchallenging. VMT, however, measures how much auto travel a proposed project would produce on roadways and assesses project impacts based on how much additional driving they are likely to generate. Mitigating VMT has shown to be more challenging in a rural setting due to factors like limited transportation alternatives, having a dispersed population, and common measures to reduce VMT are generally less effective or infeasible. Unincorporated Humboldt County contains just over half of the total population for the County, and with limited available public transit in these areas, many residents drive longer distances for services, work, or other retail or recreational purposes than residents within incorporated cities. These facts pose some challenges with reducing VMT in the County.

While agencies have the discretion to apply the VMT metric on a case-by-case basis, this allows for subjectivity. Adoption of the Policy Guidelines would provide a clear, quantitative measure to assess transportation impacts under CEQA, and identify specific VMT screening criteria and mitigation strategies that are essential for Department staff, decision makers, local professionals and the public when evaluating projects. This allows for better planning to mitigate VMT, promote sustainable land use practices, and would facilitate the future buildout of the General Plan and other adopted plans.

There are several ways a local jurisdiction can establish VMT thresholds, through the General Plan, a Climate Action Plan, a Regional Transportation Plan (RTP), or through a standalone policy document. To be done through a General Plan amendment, adoption of a Climate Action Plan or a Regional Transportation Plan, an assessment of what population increase is anticipated with the plan and the level of associated increase in VMT that is considered acceptable would need to be provided for substantial evidence to support the threshold. This information was not included in the amendment to the General Plan update in 2017 and establishing a threshold was deferred to future action. This information was also not included in the RTP VROOM 2022-2042 (Attachment 5) prepared by HCAOG. While the original plan was to include this assessment in the Climate Action Plan for the County, there were complications with the funding requirements and deadlines for this to happen. Therefore, the County has developed a VMT policy to establish thresholds, which is based on the Technical Advisory for substantial evidence.

Policy Proposal

The Policy Guidelines establishes a baseline for existing VMT which is used to set the threshold for VMT reduction. The Technical Advisory recommends a standard reduction of fifteen percent below existing VMT for new development projects considered to have a less than significant transportation impact. The following recommendations related to the Policy Guidelines are being considered:

1. Methodology for Establishing a Baseline VMT: The County is using the unincorporated Humboldt County boundary for estimating average VMT baseline with the use of 2022 StreetLight data.
2. Thresholds - Land Use Projects: The County is establishing a threshold of fifteen percent or more below existing VMT for residential and employment land use projects.
3. Screening Criteria: The County has selected the following screening criteria to identify projects that would result in less than significant VMT impacts without requiring a detailed VMT analysis.
 - a. Small projects consistent with the General Plan and Zoning Code that generate 110 trips or less.
 - b. Residential and office projects consistent with the General Plan and Zoning Code that are located in low-VMT areas identified in the Policy Guidelines.
 - c. Projects consistent with the General Plan and Zoning Code that are within a half-mile of an existing major transit stop identified in the RTP VROOM 2022-2042 and contain no more than the minimum required parking spaces.
 - d. Projects containing 100% affordable housing located in infill areas defined as Urban Areas under the US Census Bureau.

- e. Local-serving retail projects or other local serving employment projects less than 50,000 square feet that improve retail destination proximity and thus shorten trips and reduce VMT.
 - f. Mixed-use projects consistent with the General Plan and Zoning Code that are located in low VMT areas identified in the Policy Guidelines.
 - g. Redevelopment projects that lead to no increase in VMT.
4. Mitigation Strategies: The County has identified the following mitigation strategies that are appropriate for Humboldt County.
- a. Project-scale strategies:
 - i. Provide transit-oriented development
 - ii. Increase residential and job densities
 - iii. Use cleaner-fuel vehicles
 - iv. Implement car-sharing programs, ride-sharing programs
 - v. Provide employer-sponsored vanpool
 - vi. Implement bike-share program and provide subsidies to e-bikes
 - b. Community-scale strategies:
 - i. Provide pedestrian network improvements.
 - ii. Provide low-stress bicycle network improvements.
 - iii. Increase transit service frequency and speed.
 - iv. Implement plans and ordinances aimed at reducing VMT (such as a ride-share ordinance)
 - c. Program-based strategies:
 - i. VMT Impact Fee Program

Establishing a policy that reduces VMT in Humboldt County will facilitate achieving the GHG emissions reduction targets in the Draft Regional Climate Action Plan, and is consistent with the following objectives of the General Plan which facilitate the reduction of VMT and GHG emissions in line with the intent of SB 743:

- Reduce the County's off-street parking requirements to encourage business development and reflect multi-modal access options within the Land Use Element.
- Reduce vehicle miles traveled, increase walking and biking capacity and use of multi-modal transportation within the Circulation Element.
- Reduce GHG emissions and yield significant public health benefits within the Energy Element, and the Air Quality Element.
- Promote infill development within the policies of the Housing Element.

Methodology and Metrics for Baseline VMT

VMT metrics require a geographical boundary to define the extent of data to select and analyze, and the daily average can change depending on the geographical boundary. According to the Technical Advisory the County has the option of using the unincorporated county average or the regional average which includes data for the incorporated cities. The Policy Guidelines have been developed using unincorporated Humboldt County's boundary for estimating average VMT, excluding the incorporated cities. This reflects vehicle trips that start or end in the unincorporated areas of Humboldt County and aligns with the area over which the County has land use jurisdiction over. Unincorporated County metrics reflect the differences in the built environment and land use context of unincorporated Humboldt compared to the incorporated cities and will support the County's ability to establish a threshold of significance that reflects the goals and policies in the General Plan.

In 2023 County Staff began working with Fehr & Peers to conduct an analysis of the average existing VMT and produced a VMT Study for Humboldt County. While conducting the analysis it was considered whether the County should utilize the Humboldt County Travel Demand Model (HCTDM) to forecast existing VMT or use location-based StreetLight data to estimate existing VMT. It was decided that StreetLight data would be the best available current data, as the HCTDM was last updated in 2015 and is based on 2010 California household travel surveys.

While Travel Demand Models are traditionally considered the best available traffic data, they often have limitations. Location-based data such as StreetLight provides a powerful alternative for calculating VMT because estimations are based on robust datasets with less demographic bias than household travel surveys, trips are calculated from start to finish with no boundaries and can be identified as resident, employee or visitor, and trips in different geographic areas can be compared apples-to-apples without concern of whether the underlying survey methods are dissimilar. StreetLight data is captured from smart phones and cars with GPS, which is highly anonymized and has a robust set of samples for estimating average VMT. However, there are some concerns about the use of StreetLight data such as the future availability of data with privacy settings changing on iPhones, as well as the accuracy of trips calculated in rural areas without available cell or Wi-Fi services.

Since some of the data comes from GPS in cars, it is anticipated that this type of data is only going to increase over time with people transitioning to newer vehicles, and StreetLight has changed their methodology to address the change in iPhone default privacy settings. As well, trips that occur in rural areas without cell or Wi-Fi services are still counted if the trip starts and ends with service. While there may be some potential issues with StreetLight data, it has been found to be more reliable and accurate for vehicle travel patterns than Travel Demand Models, which are highly conservative. The use of StreetLight data for developing VMT metrics was found to be compliant with SB 743 in the White Paper from StreetLight (Attachment 6).

The VMT Study used StreetLight data from the year 2022 to get the average VMT per resident (HBX) and average VMT per employee (HBW) for unincorporated Humboldt, and for each incorporated city. The identified HBX and HBW are the established baselines for existing VMT. Having these different metrics is useful in reviewing different types of development projects for an apples-to-apples comparison. (i.e. A proposed residential project would be measured against the established HBX, and a proposed office or employment project would be measured against the established HBW.)

Average VMT per Resident HBX

HBX encapsulates trips that start or end at a home-base in unincorporated Humboldt and includes home-based to other trips or other to home-based trips (“other” would include retail or commercial locations, but not work). The established baseline for unincorporated Humboldt County HBX was found to be 14.7 miles. For residential projects to be considered to have a less than significant transportation impact, they would need to show that they would generate VMT fifteen percent or more below the baseline. Further, explanation on StreetLight’s methodology to analyze and categorize data to establish HBX estimates is included in the SB743 Overview from StreetLight (Attachment 7).

Average VMT per Employee HBW

HBW encapsulates trips that are home-based directly to work or work directly to home-base. The established baseline for unincorporated Humboldt County HBW was found to be 22.1 miles. For employment projects to be considered to have a less than significant transportation impact, they would need to show that they would generate VMT fifteen percent or more below the baseline. Further, explanation on StreetLight’s methodology to analyze and categorize data to establish HBW estimates is included in Attachment 7.

Low-VMT Areas

The VMT Study also identified the average HBX and HBW for US Census block groups countywide. Block group VMT data was used to establish low VMT areas that already meet the proposed threshold and allows screening out new development projects located within low VMT areas. This information is available to the public on the Humboldt County Web GIS and block group HBX and HBW data will be useful to other local jurisdictions for analyzing projects against their own identified and adopted thresholds.

Mitigation Strategies

The VMT Study identified VMT reduction strategies that are most likely to be effective in Humboldt County. These mitigation strategies include community-scale, project-scale, and program-based strategies, have been modified from the VMT Study to fit the needs of Humboldt County, and the strategies are outlined below.

Community-Scale Strategies: would be applied to future long-range plans.

1. Provide pedestrian network improvements.
2. Provide low-stress bicycle network improvements.

3. Increase transit service frequency and speed.
4. Implement plans and ordinances aimed at reducing VMT (such as a ride-share ordinance.)

Project-Scale Strategies: would be applied to new development projects that are found to be above the VMT threshold through a detailed VMT analysis. Projects above the threshold would be required to apply mitigation to the extent feasible.

5. Provide transit-oriented development.
6. Increase residential and job densities.
7. Use cleaner-fuel vehicles.
8. Implement car-sharing programs and ride-sharing programs.
9. Provide employer-sponsored vanpool.
10. Implement bike-share program and provide subsidies to e-bikes.

Program-Based Mitigation Strategies: Other things to consider for future implementation to help achieve local VMT reductions are program-based mitigation strategies.

11. VMT Impact Fee Program: This is a system where developers of new construction projects are charged a fee based on the projected increase in VMT that their development will generate. The collected funds would be used to fund transportation projects which are specifically designed to reduce VMT, such as improved transit or bicycling and pedestrian infrastructure. This program is in line with policy C-P12 Countywide Traffic Impact Fee in the Circulation Element.

Conclusion

In conclusion, adopting a policy for VMT threshold will encourage infill development, mixing of uses, active transportation, and promote use of the public transit system. All these efforts will reduce the need for vehicle travel, promote healthier lifestyles and reduce GHG emissions. The policy will enable the County of Humboldt to comply with State law and provide an established and consistent criterion for analyzing transportation impacts of development projects and long-range plans under CEQA. The policy will facilitate the buildout of the General Plan, other adopted plans and will support and expedite new development in areas found to be suitable.

Project Location: All unincorporated areas of Humboldt County, including the Coastal Zone.

Present General Plan Land Use Designation: All land use designations.

Present Zoning: All zoning districts.

Environmental Review: The proposed policy adoption is exempt from environmental review under Section 15060(c)(3) and Section 15378(b)(5) of CEQA Guidelines, the activity is not a project as defined under Section 15378; Section 15378(b)(5) states that a project does not include organizational or administrative activities of governments that will not result in direct or indirect

physical changes in the environment.

State Appeal: This policy would not amend the Zoning Code or require a Local Coastal Plan Amendment and is therefore not appealable to the California Coastal Commission.

OTHER AGENCY INVOLVEMENT:

The VMT Study Report and proposed VMT threshold of fifteen percent or more below existing VMT was consulted on with the Humboldt County Association of Governments (HCAOG), Caltrans, and the incorporated cities. As well, the proposal and report were sent out for referral to the Humboldt Transit Authority and the Department of Public Works for review. Comments from HCAOG, and Caltrans have been received and are included in Attachment 9.

Comments from HCAOG on the VMT Study Report and *responses* are as follows:

- HCAOG recommended the use of Major Transit Stops that were identified in the RTP, which *has been included in the proposed screening criteria.*
- Questions on the VMT Study Report about the potential of using the RTP to set regional VMT thresholds and if new development project's require consistency with the RTP. *The County has the option to use the VMT reduction targets of the RTP to set thresholds of significance, as well as the option to require consistency with the RTP in screening criteria. However, the RTP does not provide an assessment of what levels of VMT are considered acceptable and does not provide substantial evidence for establishing thresholds.*

Comments from Caltrans and *responses* are as follows:

- Expressed concerns with the use of StreetLight data for comparisons with actual traffic counts, engineering purposes, or bicycle and pedestrian analysis. *StreetLight data will not be used for any of these purposes and is only recommended to establish baseline VMT.*
- The Staff Report should reconcile how VMT thresholds contribute to State goals for GHG reduction and discuss how they help meet these goals. *This is identified in the report with the objectives identified from the General Plan that facilitate VMT reduction and connects the proposed VMT thresholds to the State's GHG emissions reduction goals.*
- Due to a persistent struggle to obtain high-quality data in rural regions, Caltrans supports the use of General Plan and zoning ordinances to facilitate low-VMT development patterns and transportation systems. *No response necessary.*
- The limited availability of high-quality data may limit the region's effectiveness in a dependence upon site-specific VMT analyses for regulating land use generated VMT, particularly on an ad hoc basis, and shifting the burden of cost for assuring VMT reduction strategy compliance to individual housing developments may impact the attainment of

regional housing goals. *Projects with 100 percent affordable housing units in Urban Areas has been included in screening criteria for projects considered to be less than significant.*

- New residential development that adheres to General Plan goals, policies, standards, and implementation measures may facilitate VMT reduction at little or no cost to individual residential developments, particularly for infill sites. This assumes that no mitigation fee program is implemented by the County. Caltrans further states that Impact Fee Programs tend to be effective where development occurs at a rapid pace and where supplemental sources of funding make up a significant share of the budget to implement the Capital Improvement Plan (CIP). Mitigation fee programs may be obligated to expend the fees collected within a relatively short timeframe or the mitigation fees may need to be returned. *The proposed threshold policy does not include the implementation of a VMT Impact Fee Program at this time. However, the concept and the steps to implement are included in the report for future consideration of program-based mitigation strategies and is an implementation measure of the General Plan.*
- Based on lessons learned in other parts of California, Transit-Oriented Development (TOD) may be less likely to achieve the benefits cited in the Report due to both the higher-cost of TODs in terms of housing affordability and the existing limitations of regional transit service. This observation is not intended to discourage the use of TODs. *Although achieving TODs is currently difficult in the rural context of unincorporated Humboldt County, this has been included as a project-scale mitigation strategy, and it is anticipated that more Major Transit Stops will be added to the list as the County works to increase available public transit.*
- Caltrans states that parking management strategies will work best to reduce VMT if coupled with improvements in transit service or other VMT-reducing travel modes, such as car-share and micro-mobility programs. *Parking management strategies have not been included in the project-scale mitigation strategies that are considered appropriate for unincorporated Humboldt County. As there are limited alternative transportation modes available, many residents use personal vehicles to get to a destination. Limiting the availability of parking would only increase vehicle miles traveled when searching for parking. The Planning Commission could decide to include specific parking management strategies to the project-scale mitigation strategies as deemed appropriate for the County.*
- Using the large urban regions of California as a test-case for establishing mitigation banking or exchanges in Humboldt County may have financial limitations for amassing the capital needed to build low-VMT infrastructure that make these programs infeasible. *Additional study on this topic would be needed prior to considering the use of VMT banks or exchanges. VMT banks are not included in the proposed VMT threshold policy, but the concept is included in the VMT Study.*

- We request to receive access to the online VMT tool for Humboldt County to ensure that our evaluations and determinations of VMT impacts are consistent with those of the region. We offer to partner with the County and region to ensure that the best available data and practices are employed to meet Statewide VMT goals and targets. *The online tool is already available to the public on the Humboldt County Web GIS.*

ALTERNATIVES TO STAFF RECOMMENDATIONS:

1. The Planning Commission could decide not to recommend that the Board of Supervisors adopt a policy by resolution to establish a VMT threshold of significance, and that County Staff continue to review new development projects for VMT metric and transportation impacts on a case-by-case basis.
2. The Planning Commission could decide to recommend that the Board of Supervisors adopt a baseline VMT that is based off of the Humboldt County Travel Demand Model forecast instead of using 2022 StreetLight data.

ATTACHMENTS:

1. Draft Resolution establishing a policy for VMT threshold and screening criteria countywide.
2. VMT Threshold Policy Guidelines
3. Humboldt County VMT Study Report (Fehr & Peers, 2024)
4. Technical Advisory on Evaluating Transportation Impacts in CEQA (Office of Land Use and Climate Innovation, 2018)
5. HCAOG Regional Transportation Plan VROOM 2022 - 2042
6. SB 743 VMT Metric Methodology and Validation White Paper (StreetLight, 2021)
7. SB743 Overview Readme (StreetLight)
8. Referral Comments

Please contact Megan Acevedo, Associate Planner, at Macevedo@co.humboldt.ca.us or [707-441-2634](mailto:Macevedo@co.humboldt.ca.us) if you have questions about this item.