

# Comments on Agenda Item F.4 VMT Threshold Policy Guidelines

by Jerome Qiriaz

## General Notes

1. Choice of 15% is from 2018 OPR guidelines and is not consistent with the latest guidance from CARB 2022 Scoping Plan which recommends 25% below 2019 levels.
  1. The County VMT Report by Fehr & Peers states, on page 17, that “OPR has not released updated guidance with respect to the reduction in VMT corresponding to the 2022 scoping plan. Therefore, lead agencies should be prepared to justify their reasoning when making threshold decisions and be able to explain it to project applicants, decision makers, and the public.” The County VMT Report reiterates this on page 21, and again on page 33.
  2. Staff have simply referred to the OPR Guidelines as justification for choosing 15%. This does not appear sufficient for justifying a lower recommendation than the 2022 Scoping Plan Update.
  3. The RTP targets a 25% reduction by 2030. As stated in the EIR Addendum<sup>1</sup> for the current RTP, the target was developed by a Greenhouse Gas Targets Committee established by the HCAOG Board for the creation of the Safe and Sustainable Targets (SST) found in the current RTP. I attended and contributed (as member of the public) to the discussions of this Committee. The reason the 25% target was selected was for consistency with the latest draft version of the 2022 CARB Scoping Plan Update that was available at the time of the Committee meetings. It is unfortunate that the EIR Addendum does not appear to capture this.
2. Why are census block groups used for the baseline data set instead of TAZs from the County’s TDM? TAZs have a higher resolution, and were also intentionally designed to capture variation in the existing land use of the County.
3. Streetlight methodology notes (no specific comments)
  1. Pg. 7 of the SB 743 Methodology and Validation White Paper says Streetlight excludes trips under 500 meters (0.3 miles), resulting in significantly lower estimate of trips under 2 miles. This would increase the VMT/capita estimate, and therefore increase the target threshold.
  2. The SB 743 Overview Readme from Streetlight says on page 3; “StreetLight’s sample does not capture 100% of trips every device makes. Thus, we expect the VMT Index/Device to be lower than the actual VMT/Capita.” This would reduce the VMT/capita estimate, and therefore lower the target threshold.
  3. For reference, I analyzed BTS Data<sup>2</sup> for HumCo back in Dec., 2021. Trips <1 mile accounted for about 28% of all trips in the County, and trips between 1-3 miles accounted for roughly 28% of all trips in the County.
4. The Cutten Development Project test case in Section 6 of the County VMT Report by Fehr & Peers represents an example of how the higher HBX value for Unincorporated County (22.1) compared to the adjacent City (13.68 for the City of Eureka in this case) allows for a project to avoid potentially useful VMT mitigation measures that may be appropriate for the project’s surrounding context. Consider using a City-based VMT baseline for Unincorporated Areas within the Sphere of Influence of the applicable City if the baseline for that City is less than that of Unincorporated County. This may also help to

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1 <https://ceqanet.opr.ca.gov/2013102063>

2 <https://data.bts.gov/Research-and-Statistics/Daily-Mobility-Statistics/w96p-f2qv>

support the adjacent City's VMT reduction goals. This comment also aligns with the second Major Limitation discussed in the Project Scale Strategies Section.

1. Consider treating McKinleyville as a City and also applying this approach to McKinleyville itself (and its Sphere of Influence if one is defined). This would require assessing baseline HBX and HBW values for McKinleyville.
5. The Nordic Aquafarms test case in Section 6 of the County VMT Report by Fehr & Peers represents an example of applying this policy to an industrial project. There is lack of clarity on whether this policy can defensibly apply to industrial projects. Please clarify. See also comment 7.1 below.

## Comments on Specific Sections of the VMT Threshold Policy Guidelines

### 6. Baseline VMT Section

1. In justifying the use of 2022 VMT data through to 2030, the last paragraph states "it is not anticipated that local trends in travel patterns will significantly change over the next five years." This conflicts with the RTP which targets a 25% reduction in VMT/capita by 2030, and the Draft Regional Climate Action Plan which targets significant increases in the % mode share of walking, biking, and transit.
  1. Please identify a better justification for not needing to update the baseline VMT.
  2. Please clarify when the next baseline VMT will be targeted for completion. Is the intent to release an update in the year 2030?

### 7. Thresholds of Significance Section

1. Thresholds are offered for residential, office, retail, and redevelopment projects. However, the VMT Metrics Section indicates that "industrial" and "commercial" projects are included. There is no reference to "industrial" or "commercial" in the Thresholds of Significance Section, nor in Table 1.
  1. Is it implied that a "commercial" project that isn't office or retail could only be considered under this policy if it (referring to Table 1)
    1. Is mixed use,
    2. Includes "100% affordable housing", or
    3. Is located near a major transit stop?
  2. Is it implied that an "industrial" project could only be considered under this policy if it (referring to Table 1)
    1. Is located near a major transit stop?
  3. There does not appear to be much if any discussion of industrial projects, or commercial projects outside of office or retail, in the Technical Advisory or the County VMT Report. It is not clear that this threshold policy can be defensibly applied to projects outside of residential, mixed-use, office, or retail. Please clarify and justify if the intent is to apply to projects outside residential, mixed-use, office, or retail.
2. Please align the four bullets under this Thresholds of Significance Section with Table 1 and the Project VMT Analysis Methodology Section. There is inconsistency in language, and there are items in Table 1 that are not addressed in the Thresholds of Significance Section or the Project VMT Analysis Methodology Section (see comment 8.1 below).

3. The third bullet states that a retail project will only cause significant VMT impact if it "... increases the average VMT for the County, HBX and HBW." This statement says the VMT threshold for retail projects is 0% below the baseline.
  1. Please justify why a retail project is allowed to generate more VMT than other projects.
  2. Clarify exactly what "average VMT for the County, HBX and HBW" means. Provide the equation. Bring into alignment / consistency with the guidance in the Project VMT Analysis Methodology Section.
4. The fourth bullet treats redevelopment projects the same as retail.
  1. Please justify why a redevelopment project is allowed to generate more VMT than other projects.
  2. Please clarify what a redevelopment project is and what it is not. Would this include abandoned land uses that are no longer active, such as the Samoa pulp mill?
8. Project Screening Section
  1. Map-based screening
    1. Clarify the language on this to align with OPR and Table 1 by stating that this only applies to residential and office projects.
    2. It is challenging to see how projects in the very rural low-VMT census block groups (i.e. the census block including Dinsmore, the large census block surrounding Blue Lake, or that including Petrolia) would achieve the intent of reducing VMT. Please further justify screening projects in these census blocks.
  2. Small Projects
    1. The County VMT Report by Fehr & Peers offers, on page 29, conversions of the 110 trip threshold to VMT per day and size of residential project. However, these conversions use 2012 CHTS data. Does the County intend to use these conversions to apply the screening for small projects? If so, please state this explicitly, and justify the use of 2012 CHTS data vs StreetLight data (which includes trip length information) for establishing these thresholds.
  3. The policy states that a project can be screened out if it can be "... demonstrated to primarily attract trips that would have otherwise been traveled at a longer distance."
    1. This language is very open ended. What does a developer need to do to demonstrate this? The concept is understandable on the surface but should not be presumed to result in 15% or 25% lower VMT without detailed analysis. For example, Schukei and Rowangould, 2024<sup>3</sup> observe that "... local access [defined as jobs and households in the same census block group] matters less in terms of travel behavior in rural contexts."
      1. I assume this also applies to "Local-Serving" as used in Table 1.
  4. Table 1
    1. "Residential and Office Projects" should be "Residential **or** Office Projects"
    2. "Near transit station" should be "Near Major Transit Stop"
      1. Does "minimum parking spaces required" include allowances in code for further reducing parking minimums?
    3. For "Local-Serving Retail", please clarify that "local-serving" means less than 50,000 per the Technical Advisory.

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3 <https://doi.org/10.7922/G2BG2M9G>

1. Please assess the estimated percentage of all existing retail that is below 50,000 square feet. In other words, does this screen out a majority of likely future retail projects?
5. Please add to Figure 3 the exceptions listed after the Figure, such as discretionary projects, qualifiers on projects within ½ mile of a major transit stop, etc. For example, the additional detail shown in the figure in Section 5.4 of the County VMT Report by Fehr & Peers.
9. Project VMT Analysis Methodology Section
  1. See comment 6.2 above.
  2. Is it possible to provide improved guidance to developers on best practices for estimating home-based VMT for determining compliance with the proposed thresholds? This will help ensure consistency in the approach used by project developers. For example, should the County TDM be used?
10. Mitigation – VMT Reduction Strategies Section
  1. Ensure alignment of the recommended strategies with the draft Regional Climate Action Plan (RCAP)
    1. Or perhaps simply use the measures in the RCAP if there is significant discrepancy between the RCAP measures and those in the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (Handbook).
    2. If there is alignment between the RCAP and the measures selected from the Handbook, then state explicitly and justify.
    3. If measures from the Handbook are to be used, reference their ID in the Handbook. For example, “Increase Residential Density” is measure T-1 in the Handbook.
  2. Table 2 in the County VMT Report **should not** be used. For example the value of 31% for transit-oriented development is completely inappropriate for use anywhere in Humboldt County.
  3. I recommend referring to the Handbook instead of using Table 4 of the County VMT Report. Table 4 is a useful summary but should not be a substitute for using the Handbook.
  4. Much of the language in this section is pulled directly from the County VMT Report by Fehr & Peers. However, this language is a high level summary of the detailed guidance provided in the Handbook. If the Handbook measures are to be used (instead of those from the RCAP) do not copy the language from the County VMT Report into the Policy Guidelines. I recommend simply referring to the Handbook and requiring the use of the Handbook when applying the Project-Scale and Community-Scale measures. I recommend this for the following reasons:
    1. The County VMT Report cites the 2021 version of the Handbook. The latest version of the Handbook is dated October, 2024. It will presumably continue to be updated.
    2. There is significantly more detail and clarity provided in the Handbook that is important to understand when applying the recommended measures.
    3. There are numerous non-quantified measures listed in the Handbook that can help to significantly improve the likelihood of success of the recommended measures. It would be useful to allow these to be added to the mitigation strategies as well.
  5. If the Handbook measures are to be used (instead of those from the RCAP) consider adding language that requires consideration of including applicable non-quantified measures identified in the Handbook.
  6. “Use cleaner-fuel vehicles” strategy

1. This strategy does not reduce VMT. While it will reduce the GHG's associated with VMT, it will not reduce the health and safety impacts associated with VMT and single occupancy vehicles. This strategy requires significant further justification if it is to be used.