

**RESOLUTION OF THE PLANNING COMMISSION
OF THE COUNTY OF HUMBOLDT**

Resolution Number 25 - 025

Record Number PLN-2023-18792

Recommending that the Board of Supervisors adopt the Vehicle Miles Traveled threshold of significance policy.

WHEREAS, in September 2013, SB 743 was signed into law and initiated an update to the CEQA Guidelines to change how lead agencies evaluate transportation impacts under CEQA with the goal of better measuring the actual transportation-related impacts of any given project; and

WHEREAS, in February 2018, the Governor's Office of Land Use and Climate Innovation (LCI) updated the CEQA statute and CEQA Guidelines 15064.3 identifying vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts; and

WHEREAS, LCI issued a Technical Advisory on Evaluating Transportation Impacts, dated December 2018, and recommended a nonbinding VMT threshold of fifteen percent below that of existing VMT per capita for residential and office projects, a VMT threshold of no net increase in VMT for retail projects, and a "screening process" that identifies projects that are expected to cause a less than significant impact without the need for conducting a detailed analysis or mitigation strategies; and

WHEREAS, as of July 1, 2020, California jurisdictions are required to begin using VMT over Level of Service (LOS) when analyzing project transportation impacts under CEQA pursuant to CEQA Guidelines Section 15064.3; and

WHEREAS, CEQA Guidelines Section 15064.7(a) defines a threshold of significance as "an identifiable quantitative, qualitative or performance level of a particular environmental effect, noncompliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant"; and

WHEREAS, CEQA Guidelines Section 15064.7(b) encourages public agencies to develop thresholds of significance that the agency uses in the determination of the significant environmental effects. Thresholds of significance adopted for general use as part of a lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulations, developed through a public review process, and be supported by substantial evidence; and

WHEREAS, pursuant to CEQA Guidelines Section 15064.7(c), when adopting thresholds of significance, a public agency may consider thresholds of significance adopted or

recommended by other public agencies or recommended by experts, provided that the decision of the agency is supported by substantial evidence; and

WHEREAS, the use of 2022 StreetLight data to calculate the existing average VMT per capita for Humboldt County was found to be the most current and accurate available data for establishing metrics for VMT thresholds, and was found to be compliant with SB 743 as outlined in the SB 743 VMT Metric Methodology and Validation White Paper from StreetLight published December 2021; and

WHEREAS, the Humboldt County Planning Commission held a public hearing on the VMT Threshold Policy on May 1, 2025; and

WHEREAS, the Planning Commission is recommending that the Board of Supervisors establish a VMT threshold of significance and screening criteria for new development projects of fifteen percent or more below that of existing VMT per capita for residential and office projects, a VMT threshold of no net increase in VMT for retail projects, and a "screening process" that identifies projects that are expected to cause a less than significant impact without the need for conducting a detailed VMT analysis or applying mitigation strategies in the coastal and inland areas of unincorporated Humboldt County. This policy will provide a standardized way to measure and mitigate the environmental impacts of new development projects on transportation related to VMT, and will implement State and local goals for promoting infill, multi-modal transportation, and reducing greenhouse gases.

NOW, THEREFORE BE IT RESOLVED, that the Planning Commission makes all the following findings:

CONSISTENCY WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

1. FINDING: The VMT Threshold Policy is exempt from CEQA review pursuant to Section 15060(c)(3) and Section 15378 (b)(5) of CEQA Guidelines.

EVIDENCE: a) The VMT Threshold Policy is not considered a project under CEQA pursuant to Sections 15060(c)(3) and 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.

2. FINDING: The VMT Threshold Policy is compliant with CEQA Guidelines Section 15064.7 for selecting thresholds of significance.

- EVIDENCE:**
- a) The VMT Threshold Policy is being adopted by resolution in compliance with CEQA Guidelines Section 15064.7(b).
 - b) The VMT Threshold Policy was developed using quantifiable methods and with the guidance of the LCI Technical Advisory which is supported by substantial evidence.

PUBLIC INTEREST

- 3. FINDING:** The VMT Threshold Policy is in the public interest.

- EVIDENCE:**
- a) The VMT Threshold Policy aims to reduce vehicle travel by promoting new development located in suitable areas near existing services, and by increasing public transit and alternative modes of travel such as bicycle and pedestrian travel. These actions have several co-benefits such as promoting healthier lifestyles through active transportation, reducing local greenhouse gas emissions and improving air quality, and increasing public transit and providing equity within the region.

CONSISTENCY WITH THE GENERAL PLAN

- 4. FINDING:** The VMT Threshold Policy is consistent with the General Plan.

- EVIDENCE:**
- a) The VMT Threshold Policy is consistent with the following objectives of the General Plan which facilitate reducing vehicle miles traveled and increasing multi-modal transportation, promote infill development, reduce local GHG emissions, improve air quality, and reduce energy consumption.
 - Reduce the County's off-street parking requirements to encourage business development and reflect multi-modal access options within the Land Use Element (UL-P7 Neighborhood and Town Centers).
 - Reduce vehicle miles traveled, increase walking and biking capacity and use of multi-modal transportation within the Circulation Element (C-S9 Prioritization of Pedestrian and Bicycle Facilities and Routes, C-P23 Public Transit Service, C-P24 Long Term Transit Plan, C-P25 County-Wide Transportation Plan, C-P28 Bicycles

and Pedestrian Facilities in New Subdivisions, C-P35 Protection of Designated Pedestrian and Bicycle Routes, C-P36 Bicycle Facilities, C-P39 Encourage Bicycle and Pedestrian-Friendly Development, C-IM5 Roadway System Construction, C-IM8 Park and Ride Facilities, C-IM10 Transit Service to East, South and North County, C-IM11 Pedestrian and Bicycle System Plan).

- Reduce GHG emissions and yield significant public health benefits within the Energy Element (E-P4 Transportation Energy Conservation and Alternative Fuels Substitution, E-P10 Transportation Management Plans), and the Air Quality Element (AQ-P1 Reduce Length and Frequency of Vehicle Trips, AQ-P10 County Government Greenhouse Gas Emissions Reductions).
- Promote infill development within the policies of the Housing Element (H-P17 Promote Infill, Reuse and Redevelopment).

CONSISTENCY WITH THE COASTAL ACT

5. FINDING:

The VMT Threshold Policy will not make changes to the Zoning Ordinance or include a Local Coastal Plan Amendment. However, local policies adopted under SB 743 that affect the coastal zone should still show conformity with the policies of Chapter 3 (commencing with Section 30200) of the Coastal Act. Chapter 3 of the Coastal Act sets forth policies regarding the following issues:

- a) Access (including provisions for access with new development projects, public facilities, lower cost visitor facilities, and public access).
- b) Recreation (including protection of water-oriented activities, ocean- front land protection for recreational uses, aquacultural uses, and priority of development purposes).
- c) Marine Resources (including protecting biological productivity, prevent hazardous waste spills, diking, filling and dredging, fishing, revetments and breakwaters, and water supply and flood control).
- d) Land Resources (including environmentally sensitive

habitats, agricultural lands, timberlands, and archaeological resources).

e) Development (including scenic resources, public works facilities, safety, and priority of coastal dependent developments).

f) Industrial Development (including location and expansion, use of tanker facilities, oil and gas development and transport (both onshore and off), and power plants).

EVIDENCE: a) The VMT Threshold Policy is intended to reduce vehicle miles traveled in the region which is in line with the State goals and the goals of the Coastal Act for minimizing adverse impacts of new development.

The policy does not propose new development, and will not impact coastal public access, recreation, marine environments, land resources, development, or industrial development.

CONSISTENCY WITH STATE PLANNING LAW

6. **FINDING:** Humboldt County Code Section 312-50.3.4 requires any proposed amendment must not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law unless specific findings are made. The proposed amendment does not limit the number of housing units which may be constructed on an annual basis.

EVIDENCE: a) The VMT Threshold Policy does not propose any regulations that affect the residential density for any parcel, and will not alter residential density of parcels within Humboldt County.

7. **FINDING:** The VMT threshold policy is consistent with the intent of SB 743.

EVIDENCE: a) The VMT Threshold Policy was developed with the guidance of the LCI Technical Advisory.

8. **FINDING:** The Planning Commission is recommending approval of the VMT Guidelines but was deadlocked about whether the

baseline VMT should be based on the countywide average (including cities) or whether the average should be based only on the unincorporated area.

- EVIDENCE:
- a) The Planning Commissioners who favored the countywide average see the objective as reducing VMT to the maximum extent possible and starting with a lower baseline is consistent with this objective.
 - b) Those that thought the baseline VMT should be based on the unincorporated areas only stated the county is different than the cities, the data still prioritizes infill, and overall VMT reduction cannot be achieved only by limiting new development.
 - c) The Planning Commission with 6 members present voted 3-3 with Qiriaz, Levy and West supporting the Countywide baseline, and Skavdal, Mulder and Oneal supporting a baseline based upon the unincorporated County. McFarlane was absent.

Decision

BE IT FURTHER RESOLVED that the Planning Commission recommends that the Board of Supervisors of the County of Humboldt:

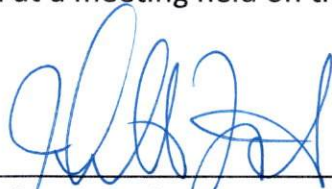
1. Adopt the VMT Threshold Policy Guidelines as amended_by the Planning Commission.

The foregoing Resolution is hereby passed and adopted after review and consideration of all the evidence on **May 1, 2025**.

The motion was made by COMMISSIONER SARAH WEST and seconded by COMMISSIONER PEGGY O'NEILL and the following vote:

AYES: COMMISSIONERS: Iver Skavdal, Noah Levy, Jerome Qiriazzi, Peggy O'Neill, Sarah West
NOES: COMMISSIONERS: Thomas Mulder
ABSTAIN: COMMISSIONERS:
ABSENT: COMMISSIONERS: Lorna McFarlane
DECISION: Motion carried 5/1

I, John H. Ford, Secretary to the Planning Commission of the County of Humboldt, do hereby certify the foregoing to be a true and correct record of the action taken on the above-entitled matter by said Commission at a meeting held on the date noted above.



John H. Ford, Director,
Planning and Building Department