

## SUPPLEMENTAL INFORMATION

For Planning Commission Agenda of:  
August 20, 2020

<input type="checkbox"/>	Administrative Agenda Item	}
<input checked="" type="checkbox"/>	Continued Hearing Item	} [H-3]
<input type="checkbox"/>	New Hearing Item	}
<input type="checkbox"/>	Old Business Item	}
<input type="checkbox"/>	New Business Item	}

Subject: **VMT Screening Criteria and Thresholds of Significance**  
Case Number: PLN-2020-16529

Attached for the Planning Commission's record and review are the following supplementary information items:

1. Comment letter addressed to the Commission, co-signed Coalition for Responsible Transportation Priorities, Northcoast Environmental Center, Environmental Protection Information Center, 350 Humboldt and Humboldt Baykeeper, and received August 13.
2. Comment letter addressed to John Ford from Caltrans, received August 13.



August 13, 2020

Humboldt County Planning Commission  
3015 H Street  
Eureka, CA 95501

*via email:*      [planningclerk@co.humboldt.ca.us](mailto:planningclerk@co.humboldt.ca.us)

Commissioners:

Thank you for the opportunity to comment on the proposed Transportation Analysis Process for implementing new CEQA Guidelines based on Senate Bill (SB) 743. As you know, the new process will require transportation impacts to be measured in terms of vehicle miles traveled (VMT) rather than vehicular congestion or level of service (LOS), as has been the common practice in the past. We strongly support the state’s move to VMT for transportation impact analysis under CEQA, and we want to ensure that the County’s implementation plan is effective and accomplishes the state’s aims. If done well, VMT assessment will help us do our part as a coastal county threatened by extremely high rates of sea level rise to reduce greenhouse gas emissions, and help us combat the crisis of traffic injuries and deaths in our communities. Unfortunately, the proposed VMT screening criteria and thresholds will be neither effective nor defensible without substantial revisions.

**Trips and Miles Are Not Interchangeable**

The screening criteria based on a specific number of projected trips per day—for “small projects” both inside and outside of Urban Services Areas—are not appropriate. We appreciate that these are derived from suggestions in the VMT Technical Advisory released by the Governor’s Office of Planning and Research (OPR). However, these statewide recommendations don't apply very well to our area. Humboldt County's development patterns are extremely heterogeneous, ranging from dense urban form to extremely rural. That means there is extreme variability in trip lengths. In other words, using trips as a proxy for is VMT highly problematic, even when urban service boundaries are factored into the analysis. In fact, Appendix 1 of the Advisory makes it clear that a "trip-based" approach to assessing VMT means measuring VMT from predicted trips, not replacing a VMT analysis with a trip analysis. In a nod to areas like ours, the Advisory notes that "clustered small towns and small town main streets may have substantial VMT benefits compared to isolated rural development." That is certainly true here and should be reflected in the screening criteria.

**Smaller Stores Can Generate Long Trips in Humboldt County**

The suggestion that any store smaller than 50,000 square feet should be automatically considered to generate less-than-significant VMT is not defensible. We recognize that the VMT Technical Advisory suggested 50,000 square feet as a threshold for "regional-serving" retail. However, this was suggested as a consideration in VMT analysis, not as an initial screening criterion. The Technical Advisory further states that "lead agencies will best understand their own communities" and should assess projects accordingly, rather than applying a one-size-fits-all approach. The county should recognize that the



50,000 square foot threshold is meant for retailers in areas with much larger populations than ours. While "big box" stores this size certainly do have a big catchment area, a store does not have to be a big box to have a large catchment area. In Humboldt County, a much smaller store than that can draw customers from around the entire region.

### **Projects in Remote Areas Generate Greater VMT**

The screening maps for "Low VMT" areas defy common sense and good planning practice. The residential map appears to identify practically all parts of the county where people actually live as "Low VMT," and the commercial map covers most areas where commercial facilities are or could be built, however rural or remote. No defensible screening tool would screen out residential or commercial projects in areas like Carlotta or Kneeland or Weitchpec, for example, by assuming they won't generate much driving. Yet all these areas and many other remote spots would be screened out by the currently proposed maps. The proposed Process does not identify the threshold used to identify these areas, but it is clear that either the threshold is unreasonably high or the data used to generate the maps are fatally flawed.

### **Countywide Averages Are Irrelevant in Urbanized Areas**

We strongly object to using countywide VMT averages as the basis for all significance thresholds. Countywide averages are undoubtedly skewed by extremely high VMT for a relatively small number of people living in the more remote areas. For that reason, the countywide average makes sense as a basis for calculating the threshold for more rural areas, but not for urbanized areas. The only procedure that makes sense for more urban areas is comparing the project's VMT to VMT in the community where it's located. For example, a project in Cutten or Myrtle town should be compared to Eureka area VMT, and a project in Bayside should be compared to Arcata area VMT.

For the same reason, the proposed procedure for determining the significance of VMT from commercial cannabis operations is indefensible. Comparing projects in urbanized areas to the countywide average, while comparing projects in non-urbanized areas to the average in the local community is exactly the opposite of the approach dictated by data and logic.

To further reduce the influence of outliers on the data, it would be advisable to use medians rather than averages when developing thresholds for urbanized areas.

### **Relative Location Matters**

The proposed Process cites evidence that affordable housing near employment centers produces low VMT. We agree. However, the screening criterion proposed does not take proximity to employment centers into account. Particularly in a region like ours, location of affordable housing is key, and projects cannot be screened out if they're distant from employment centers.

Similarly, the commercial cannabis cultivation screening criterion must be modified to include location relative to services, in addition to on-site housing. On-site housing on its own is not sufficient to assume less-than-significant VMT, because home-work trips are not the only trips employees will make.



**People and Households Are Not the Same Thing**

Throughout the proposed Process document, household VMT and per capita VMT seem to be used interchangeably, despite the fact that many individuals can live in a single household. The significance threshold for residential projects says it is based on per resident VMT, for example, but the average and threshold proposed for comparison is measured per household. Using household data as the basis for calculating per capita VMT impact thresholds is an error which, if uncorrected, will drastically underestimate impacts.

**The County Requires Too Much Parking to Assume Low VMT**

The proposed Process is correct in concluding that providing abundant parking will encourage driving even for a project near a major transit stop. However, it is incorrect in concluding that meeting but not exceeding the county’s parking requirements is evidence that parking is not abundant and that a project can therefore be screened out of further transportation impact analysis. The county’s parking requirements are premised on the assumption that all land uses are primarily vehicle-serving, and meeting them provides more than enough parking spaces to encourage driving. Either the parking requirements should be lowered or the screening criterion should require a variance to provide fewer parking spaces than the code otherwise requires.

Thank you for considering our comments.

Sincerely,

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*Making Conservation  
a California Way of Life.*

August 13, 2020

1-HUM-Countywide  
VMT Program

John Ford  
Planning & Building Department  
County of Humboldt  
3015 H Street  
Eureka CA, 95501

Dear Mr. Ford:

Thank you for giving Caltrans the opportunity to review and comment on the Humboldt County Vehicle Miles Traveled (VMT) Program. The purpose of the VMT Program is to ensure that land use projects subject to discretionary approval by the County successfully enact the statutory requirements of SB 743 in their environmental review. The VMT Program identifies screening criteria, regional or county baseline VMT data, and thresholds of significance to be used for evaluating transportation impacts under the California Environmental Quality Act (CEQA). We offer the following comments:

The baseline VMT data for the VMT Program was generated by the Humboldt County Travel Demand Model (HCTDM), using a base year of 2015. The VMT Program also states that the HCTDM can be used to estimate a project's effects on total VMT. Estimating a project's effects on total VMT may be useful for determining whether a retail use serves local residents or if it attracts trips from the larger region. Caltrans developed the HCTDM in partnership with the County and we have not yet had the opportunity to employ the HCTDM to assess projects for regional VMT impacts based on land use type. We request to evaluate whether the model requires additional validation or calibration to produce reliable results and share our findings with the County. The HCTDM was intended to be used by other members of the public body within the region so it is important that the model be tested and studied to produce statistically acceptable results.

**Screening Criteria**

The use of map-based screening relies on situating new development within areas having low VMT under existing conditions. To be effective, the maps provided by the County will need to be replaced with GIS layers that can assess VMT patterns at the parcel level.

Figure 1 includes a chart showing the CEQA Transportation Analysis Process for Land Use Projects within Humboldt County. The County should clarify that a project which requires a General Plan Amendment as a part of the approval process will need to conduct a VMT analysis to ensure that the amended General Plan will not result in transportation (VMT) impacts.

Either within the text of the chart in Figure 1 or by narrative description of the chart, the County should emphasize the role of VMT mitigation to reduce VMT to less than significant levels.

The VMT Program includes references to the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA that certain projects located within "High Quality Transit Corridors" or at "Major Transit Stops" may be considered less than significant for transportation impacts. A high-quality transit corridor is defined in the Public Resources Code, § 21155 as "a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." A "Major Transit Stop" is defined in the Public Resources Code, § 21064.3 meaning "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." We are not aware of any location in Humboldt County that currently meet the above definitions and recommend that the VMT Program include a statement recognizing such.

### **Baseline VMT Data**

The County of Humboldt proposes to use the unincorporated county area or sub-areas of the county to establish a VMT baseline. Caltrans recommends using different geography, as stated in OPR's Technical Advisory:

For residential projects in unincorporated county areas, the local agency can compare a residential project's VMT to (1) the region's [i.e. MPO's] VMT per capita, or (2) the aggregate population-weighted VMT per capita of all cities in the region. (p. 15)

OPR recommends these geographies because if areas with lower VMT (such as cities or other more intensively urbanized areas) are excluded, the connection to state climate goals, detailed in [CARB 2017 Scoping-Plan Identified VMT Reductions and Relationship to State Climate Goals](#), is obscured and it is no longer possible to determine from the analysis whether the project's VMT will be in alignment with the state's climate commitments. Use of just a portion of a

recommended geography, such as a sub-area of a county, could similarly lead to a more permissive baseline than what is necessary to meet state climate commitments.

OPR's intent is that the term 'region' means an RTPA or MPO. This will be clarified in a future update of OPR's Technical Advisory.

### **Thresholds of Significance**

We concur with and support the County's proposed thresholds to reduce VMT for office and residential uses by fifteen percent (15%).

We recommend that the County identify the rationale or substantial evidence for using VMT per employee for industrial projects.

We recommend that the County identify the rationale or substantial evidence for using net change in total VMT for hotel and school projects. It is not clear that this method of VMT calculation is aligned with OPR's Technical Advisory.

### **VMT Mitigation**

We recommend adding a discussion about VMT mitigation. The following goals will reinforce efforts to reduce VMT: shifting mode choice, increasing vehicle occupancy, reducing trip generation, and reducing trip length. New development and changes in land use can influence the way people travel and reinforce the above goals through increasing housing density, promoting a diversity of land uses through mixed use zoning, setting appropriate design standards to build more walkable and bike-friendly communities, reducing distances to transit routes for new development, employing parking demand management, and making provisions for destination accessibility to improve access for multiple modes of travel.

We look forward to continued cooperation with the County to implement VMT reduction goals to help manage congestion and the safety of the County and State road network. Please contact me with questions or for further assistance regarding the above comments at: <jesse.robertson@dot.ca.gov>.

Sincerely,

*Jesse Robertson*

JESSE ROBERTSON  
Transportation Planning  
Caltrans District 1

Mr. John Ford  
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