

OPR Steps

Project Questions

Procedural Flowchart

● Decision ○ Analytical process or procedural outcome

Step 1 Screening

Not applicable

Step 2 Establishing Baseline VMT Levels

Is the general plan for an incorporated city or unincorporated area?

Step 3 Establishing VMT Threshold

What is the surrounding land use context?

Step 4 Forecasting Project VMT Effects

Should the general plan's VMT effects be forecasted only through the plan's horizon year, or should a separate cumulative year analysis be conducted?

Step 5 Identifying Significant Impacts

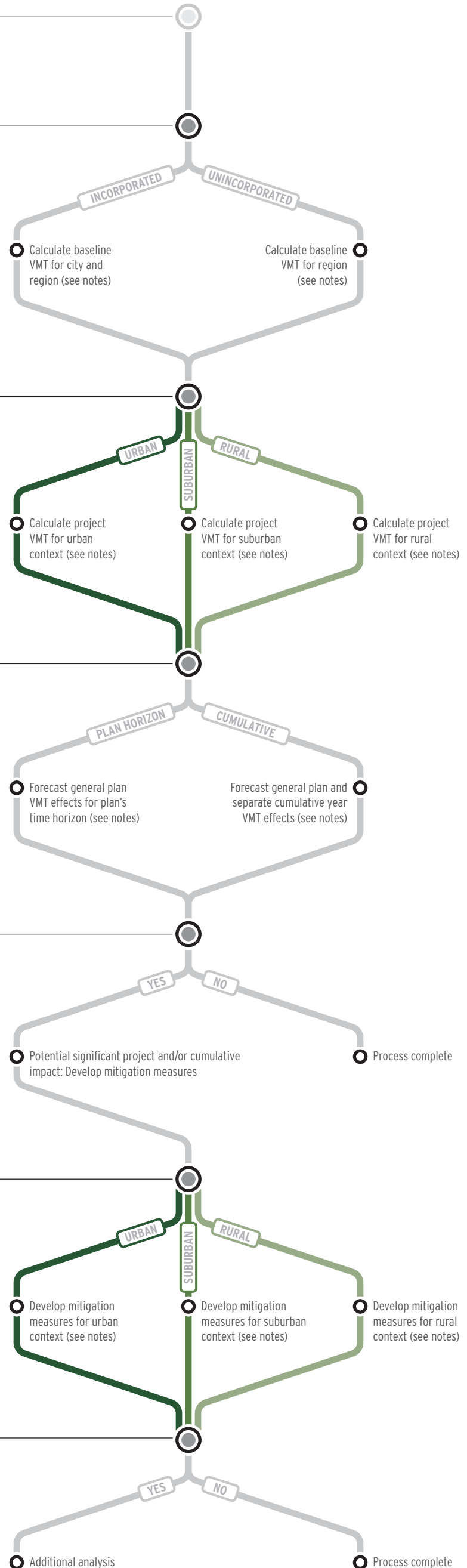
Do the VMT forecasts from Step 4 exceed the VMT thresholds from Step 3?

Step 6 Developing Mitigation Measures

What is the surrounding land use context?

Step 7 Identifying Impacts of Mitigation

Do the mitigations require new or expanded facilities/ services that may have environmental impacts that require evaluation under CEQA?



OPR Steps

Analysis Procedures

Technical Notes

Land Use Color Coding: Urban Suburban Rural

Step 1 Screening

The screening phase is not applicable. All general plans must be evaluated although the evaluation may be limited to an assessment of RTP/SCS consistency.

Step 2 Establishing Baseline VMT Levels

If plan is for an incorporated city, calculate citywide and regional VMT/capita or VMT/service population per weekday. If plan is for in an unincorporated area, calculate regional VMT/capita or VMT/service population per weekday and the same metric for the incorporated cities in the county and take the average.

Baseline should be tied to the date of the NOP release. Hence, baseline VMT calculations may require obtaining current year data or interpolating between base year and future year model estimates.

Step 3 Establishing VMT Threshold

VMT thresholds should consider lead agency discretion and the following factors.

- SB 743 legislative intent objectives to encourage infill, promote active transportation, and reduce GHGs.
- Internal general plan consistency requirements especially between VMT reduction goals that may already be established for energy, air quality, and GHGs.
- VMT is a composite metric that reflects the general plan's envisioned future as portrayed in the land use and circulation elements.

OPR Recommendation

- Case by case.
- Consistency with the RTP or RTP/SCS. Development specified in the plan is also specified in the SCS (i.e. the plan does not specify developing in outlying areas specified as open space in the SCS). Taken as a whole, development specified in the plan leads to VMT that is equal to or less than the VMT per capita and VMT per employee specified in the SCS.

Option 1

- Consistency with the RTP.

Option 2

- Less than the regional VMT/capita from Step 2.
- 90-85% of regional VMT/capita from Step 2.
- 60-25% of regional VMT/capita from Step 2.

Option 3

- No increase in baseline VMT/capita from Step 2.

Lead agencies have ultimate discretion to establish their own significance thresholds per Guidelines Section 15064.7, but substantial evidence is required to support those thresholds. If they differ from the OPR recommendations, substantial evidence should also be provided to explain why.

Option 2 thresholds are based on maximum potential VMT reductions associated with vehicle travel reduction strategies contained in the Quantifying Greenhouse Gas Mitigation Measures, CAPCOA, 2010. This option also recognizes that most travel forecasting models are not sensitive to TDM strategies so additional VMT reduction is possible through general plan implementation and TDM conditions passed through to individual projects. The CAPCOA TDM strategies generally apply to individual projects or sites, so any use for general plan purposes needs to focus on how subsequent development projects and even how existing development may be affected by implementation of these strategies (i.e., a TDM ordinance versus entitlement review conditions only).

Threshold considerations should also consider how they will be established and used for the general plan EIR. Adopting new thresholds prior to starting the general plan EIR may be advisable to avoid a CEQA outcome that conflicts with the proposed general plan policy intent.

Step 4 Forecasting Project VMT Effects

Project Forecasting

For impacts, each general plan alternative should be evaluated against existing (i.e., baseline) conditions per CEQA Guidelines Section 15125(a). For transportation, this means starting with a baseline condition upon which future population and employment and network changes are added. A general plan influences the location of land supply for permitted and conditional uses but does not change the regional control totals for cumulative population and employment growth. However, the plan may propose transportation network changes that influence regional travel behavior. As such, VMT effects should be analyzed using regional scale trip-based or activity-based models. The plan effects on VMT should be captured by modifying the network to reflect plan changes and modifying the regional allocation of population and employment growth based on the land supply changes associated with the plan alternatives.

The general plan EIR analysis shall also **discuss** any inconsistencies between the proposed general plan and the currently adopted general plan per CEQA Guidelines Section 15125(d). These inconsistencies should consider CEQA Guidelines Section 15125(e), which requires **analysis that examines** potential future conditions in the adopted plan. Note the bold "discuss" and "analysis that examines." These are informational requirements for the EIR and do not establish the no project condition as a specific significance threshold. Since lead agencies are allowed to select their own significance thresholds (and should) per CEQA Guidelines Section 15064.7, the general plan should be evaluated against thresholds that are aligned with their community values and selected as part of Step 3 above.

Because of the long-term horizon for a general plan, project and cumulative analysis are often the same scenario. The no project scenario should generally represent the adopted general plan in the context of the adopted RTP or RTP/SCS. The plus project scenario should represent the reallocation of the population and employment growth associated with the proposed general plan and any proposed modifications to the local and regional transportation network. Regional VMT or VMT/capita should be calculated for both scenarios. Any increase in VMT or VMT/capita above no project levels may constitute a significant impact because it could jeopardize regional air quality conformity or GHG reduction findings—hence, the recommended thresholds above in Step 3.

OPR Steps

Analysis Procedures

Technical Notes

Step 4 Forecasting Project VMT Effects (Continued)

Cumulative Forecasting

Since many general plans accommodate growth beyond a 20-year horizon or beyond the planning horizon of the RTP or RTP/SCS, cities and counties should consider whether to include a separate cumulative year that recognizes this outcome. At a minimum, the potential additional land use development or population and employment growth should be acknowledged. Preferably, it would be quantified and the transportation analysis would include information about the potential effect on trips, VMT, and transportation network expansion needs. Actual link level traffic forecasts may not be reasonable especially if the land use growth includes substantial imbalances in jobs and housing.

Project level analysis may overstate the project's effect on VMT because it does not fully consider the project's influence on the VMT generation of surrounding land uses. Hence, cumulative analysis may be more meaningful for impact purposes.

Step 5 Identifying Significant Impacts

Identify significant impacts for all land use types and impact scenarios. Significant Impact may occur if project's Step 4 VMT exceeds Step 3 threshold.

Step 6 Developing Mitigation Measures

For urban areas, effective VMT reduction strategies at the general plan level will tend to be those that alter the built environment to improve accessibility (e.g., land use density, diversity, distance to transit, etc.). TDM strategies can also be effective but the general plan needs to be clear about how these strategies will be applied to individual development projects. Many TDM strategies are specific to individual sites and will not scale up to the general plan level. VMT reduction potential is highest in urban areas due to land use density and the associated variety of travel choices typically available.

For suburban and rural areas, the same notes for urban areas apply about VMT strategies, but the VMT reduction potential is lower due to land use patterns and density that generally require auto use. Trip lengths can be influenced through more compact land use patterns even if auto use is necessary.

Mitigation can include land use, transportation network, or travel behavior changes. Land use changes for a general plan typically relate to the 7Ds. Transportation network or travel behavior changes tend to include actions that reduce vehicle travel demand such as the TDM/pricing strategies contained in Quantifying Greenhouse Gas Mitigation Measures, CAPCOA, 2010.

Step 7 Identifying Impacts of Mitigation

Mitigation actions can create other environmental impacts. Mitigation actions that require the expansion of existing facilities or services or the creation of new facilities or services may have an effect on the environment that should be evaluated as prescribed by CEQA Guidelines Section 15126.4(a)(1)(D).