BCAG SB 743 Implementation – Local Plan Review

Consistency Assessment

BACKGROUND

As lead agencies transition to vehicle miles of travel (VMT) as the new metric for transportation impact analysis under CEQA, assessing their adopted plans is often useful in understanding whether they have already established expectations about VMT reduction. This information is important to consider when establishing VMT impact significance thresholds.

LOCAL PLANS

The following local plans were reviewed for this assessment.

Butte County 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) 2020-2040, BCAG, December 10, 2020
2020 Regional Transportation Plan/Sustainable Communities Strategy, Draft Supplemental Environmental Impact Report, BCAG, October 2020
http://www.bcag.org/documents/planning/RTP%20SCS/2020%20RTP%20SCS/Document%20Chapters/2020%20RTP%20SCS%20Document-ALL%20REVISED.pdf
http://www.bcag.org/documents/planning/RTP%20SCS/2020%20RTP%20SCS/SEIR/_2020%20RTP%20-%20SCS%20SEIR.pdf

The 2020 RTP/SCS contains multiple policies supportive of VMT and associated air pollution and GHG emissions reduction. The plan acknowledges that these reductions need to be balanced with improving accessibility and connectivity to destinations as framed in Policy 13.1.1 below.

> *13.1.1. Tailor transportation improvements to better connect people with jobs and other activities such as "Smart Mobility" concepts to increase system efficiencies and strive to reduce GHGs.*

The plan does not contain a specific VMT reduction goal but the SCS did achieve GHG per capita reductions in excess of the SB 375 targets for the region of which VMT per capita reductions contributed. As documented in Table 4.9-1 of the 2020 RTP/SCS SEIR, total VMT generated in the county was projected to increase from 4,705,417 under 2018 baseline conditions to 5,332,327 under 2040 conditions with the proposed plan. This represents a 13.3 percent increase although total VMT per capita was projected to decline about 3.4 percent from 20.7 to 20.0 between 2018 baseline and 2040.[1]

[1] The VMT forecasts exclude trip lengths external to the county and total VMT includes commercial vehicles.

Butte County General Plan 2030, Circulation Element, Butte County, October 26, 2010 (Amended November 6, 2012)
Butte County General Plan 2030, Draft Supplemental EIR, May 31, 2012
Butte County General Plan 2030, Draft EIR, April 8, 2010
https://www.buttecounty.net/Portals/10/Planning/General%20Plan/2018%20Updated%20GP/9_Circulation_PRR.pdf
https://www.buttecounty.net/Portals/10/Planning/General%20Plan/Butte_SuppEIR_PublicReview.pdf?ver=2019-11-12-103207-967
https://www.buttecounty.net/Portals/10/Docs/GP2030/ButteCountyGP_PublicReview_EIR.pdf?ver=2019-07-25-160952-113

The general plan does not contain quantitative VMT reduction goals. However, multiple policies are supportive of achieving VMT reduction through increasing vehicle occupancies, sharing rides, promoting transit and active transportation, and supporting work-at-home programs.

> *CIR-P2.1 Carpooling shall be encouraged by providing additional carpool pickup and park-and-ride locations near transit centers and at freeway interchanges.*
>
> *CIR-P2.2 Trip reduction among County employees shall be encouraged. Specific measures to encourage trip reduction could include providing subsidies, bicycle facilities, alternative work schedules, ridesharing, telecommuting and work-at-home programs, employee education and preferential parking for carpools/vanpools.*
>
> *CIR-P2.3 Home occupations shall be encouraged through streamlined application processes that are appropriate to the intensity and proposed uses of the home business.*
>
> *CIR-P2.4 Employers shall be encouraged to provide transit subsidies, bicycle facilities, alternative work schedules, ridesharing, telecommuting and work-at-home programs, employee education and preferential parking for carpools/vanpools.*

Despite the policy support, the daily VMT was projected to increase from 4,126,991 to 6,397,512 between 2006 and 2030 with the proposed plan. A 2012 general plan amendment increased the 2030 daily VMT by 1,511.

Butte County Climate Action Plan (CAP), Butte County, February 25, 2014
http://www.buttecounty.net/Portals/10/Docs/CAP/ButteCountyCAPAdopted2014-02-25.pdf?ver=2014-04-25-152241-733

The Butte County CAP sets community GHG reduction targets for 2020 and 2040 compared to baseline 2006 levels but does not establish a specific VMT reduction goal. Under 2020 conditions, the CAP expected only about 0.2 percent of GHG emissions reduction to come from transportation measures. Annual VMT was largely expected to continue increasing from 464,302,660 in 2006 to 567,121,185 in 2020, and 677,283,969 in 2030 representing a total increase of 46 percent between 2006 and 2030.

City of Biggs General Plan, City of Biggs, January 2014
City of Biggs 2030 General Plan EIR, City of Biggs, March 2014
http://buttelafco.org/sites/default/files/resources/City%20of%20Biggs%20General%20Plan%20-%20January%202014.pdf
http://buttelafco.org/resources/master-documents/city-biggs-2030-general-plan-final-eir

The Biggs General Plan does not establish a specific VMT reduction goal. The circulation element focuses on provide an adequate level of service (LOS) for driving although the plan recognizes the importance of connectivity, complete streets, and multiple travel choices to reduce automobile dependence and VMT. The EIR acknowledges that implementation of the plan could increase VMT, but no details are provided.

City of Chico 2030 General Plan, City of Chico, April 2011 (Amended March 2017)
Chico 2030 General Plan Update, Draft Environmental Impact Report, City of Chico, September 2010
https://chico.ca.us/post/chico-2030-general-plan
https://chico.ca.us/post/draft-eir-chico-2030-general-plan

The City of Chico General Plan contains the following policy and supporting action related to setting VMT reduction expectations for land use projects.

> *Policy CIRC-1.5 (Vehicle Miles Travelled Analysis) – Consistent with State law, implement Vehicle Miles Travelled (VMT) assessments as part of the environmental review process under CEQA.*
>
> - *Action CIRC-1.5.1 (VMT CEQA Analysis) – For projects that require a full traffic analysis as part of the CEQA review process, perform a VMT analysis consistent with the California Office of Planning and Research CEQA Guidelines.*

The action statement to perform VMT impact analysis consistent with the Office of Planning and Research (OPR) CEQA Guidelines could be interpreted as an endorsement of OPR VMT threshold recommendations contained in the *Technical Advisory on Evaluating Transportation Impacts in CEQA,* OPR, 2018. The advisory is a companion to the CEQA Guidelines and includes the following general VMT reduction expectation for land use projects.

> *In summary, achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals.*

The 2030 General Plan was an update to 1994 General Plan and contained an urban land use form with a better mix of land uses, higher densities, and more conducive to walking and bicycling. These changes were projected to reduce 2030 VMT per household approximately 11 percent from 64 miles to 56 miles.

City of Chico 2020 Climate Action Plan, City of Chico, No Date
http://chicosustainability.org/documents/ClimateActionPlan.pdf

The Chico CAP contains the following objectives related to a quantitative VMT reduction.

> *Objective 1: Reduce Vehicle Miles Travelled*
> *1.3: Residential Transportation Education and Challenge: The City will partner with BCAG to expand its public education and outreach campaigns to encourage residents to use alternative transportation and reduce their individual annual vehicle miles traveled by 8%...*

This is not a mandatory reduction goal used in evaluation of land use or transportation network decisions. Other objectives also support reducing VMT from large employers and by creating a transportation network that is multi-modal and supportive of active modes.

California State University, Chico Master Plan, Draft Environmental Impact Report (DEIR), CSU Chico, August 2020
https://www.csuchico.edu/fms/planning.shtml

The CSU Chico Master Plan DEIR included the following specific VMT impact thresholds based on the *CSU Transportation Impacts Study Manual.*

> *Project level (mixed-use) impacts if VMT per service population exceeds threshold of 15% below existing regional, sub-regional, or citywide VMT per service population*
>
> *Cumulative (mixed-use) impacts VMT per service population under "with project" condition exceeds citywide, regional, or sub-regional VMT per service population identified under the RTP/SCS condition [uses BCAG region from 2040 forecast]*

The impact analysis disclosed that compared to the no project condition in 2030, the project would increase total VMT by 6.4 percent and reduce VMT generated per student by 5.9 percent. As a result, implementation of the master plan was identified as causing a significant VMT impact. Mitigation identified the development of a transportation demand management (TDM) containing a menu of VMT reduction strategies. These types of strategies are dependent on the travel behavior of future students, faculty, and staff, which cannot be predicted with sufficient confidence or evidence to ensure that VMT generation would be reduced to acceptable levels. As a result, the impact was found to be significant and unavoidable after mitigation.

City of Gridley 2030 General Plan Circulation Element, City of Gridley, No Date
http://gridley.ca.us/public/uploads/pdfs/General_Plan-_Circulation_Element.pdf

The Gridley General Plan does not establish a specific VMT reduction goal. The plan contains land use and transportation policies supportive of minimizing VMT generation by creating a land use and transportation system conducive to walking and bicycling.

City of Oroville 2030 General Plan Circulation and Transportation Element, March 2015
https://www.cityoforoville.org/home/showdocument?id=12188

The Circulation and Transportation Element contains one policy directly related to VMT reduction.

> *P2.5 Reduce the total vehicle miles traveled through designation of land uses that support multi-modal travel and provision of more direct routes to high activity locations.*

Other goals and policies in the general plan are supportive of VMT reduction through actions such as supporting mixed use development, but no quantitative reduction expectations are set for VMT.

City of Oroville Community Climate Action Plan, March 2015
https://www.cityoforoville.org/home/showpublisheddocument?id=12191

The City set a target to reduce GHG emissions from community activities to 11 percent below 2010 levels by 2020. Approximately 1.6 percent of total GHG reductions were projected to come from transportation sector strategies that directly reduce VMT. Specific strategies included mixed use development, a balanced mode circulation plan, pedestrian network improvements, traffic calming, and voluntary commute trip reduction programs.

Town of Paradise 1994 General Plan, Town of Paradise, As Amended Through January 2008
https://www.townofparadise.com/index.php/forms-and-documents/planning/223-townofparadise-generalplan-1994/file

The Paradise General Plan does not establish a specific VMT reduction goal. The plan contains land use and transportation policies supportive of minimizing VMT generation by encouraging infill, reducing automobile dependence, and creating a land use and transportation system conducive to walking and bicycling. Policy CP-13 is an example of support for reducing VMT.

> *CP-13 Automobile dependency within Paradise should be reduced for local residents and visitors by implementing congestion management and trip reduction plan program that decrease the number of vehicle miles travelled which, in turn, reduces air pollution and congestion and saves energy.*

LEAD AGENCY TAKEAWAYS

To implement SB 743, lead agencies will need to determine their own significance thresholds for VMT impacts under 'baseline' and 'cumulative' conditions. Important considerations based on the local plan review above include the following.

- General plans contain population and employment growth that will increase total VMT. This growth in VMT has been accepted by the agency and is a starting point for considering any further reduction in VMT or the rate of VMT generation. In some cases, VMT per capita (or

resident) may show small decreases but not to the level expected by the VMT threshold recommendations of OPR.

- CAPs often contain embedded VMT reductions that are not transparent. Lead agencies setting VMT reduction expectations as part of SB 743 VMT impact thresholds should verify their consistency with GHG reduction goals.

- CEQA analysis of air quality, GHG, and energy impacts may also contain embedded VMT reduction expectations. Like CAPs, lead agencies should verify consistency of VMT reduction expectations across these technical areas.

- The CSU Chico Master Plan EIR is an important case study for other lead agencies because the rest of Butte County will have similar challenges meeting the level of VMT reduction established by OPR and finding effective mitigation to reduce VMT.

While none of the local plans included specific quantitative VMT reduction goals for use in evaluating land use or transportation projects, some information was available related to VMT performance. This information is summarized below.

Summary of VMT Performance in Local Plans

Jurisdiction	Type of Plan	Total VMT Performance	VMT/Capita Performance
BCAG	RTP/SCS	Regionally generated VMT increases from 4,705,417 to 5,332,327 (2018-2040)	Regionally generated VMT/capita declines about 3.4% from 20.7 to 20.0 (2018-2040)
Butte County	General Plan CAP	Increases from 4,126,991 to 6,399,023 (2006-2030) Increases from 464,302,660 annually to 677,283,969 (2006-2030)	NA NA
Biggs	General Plan	NA	NA
Chico	General Plan CAP	NA* NA	NA* NA
CSU Chico	Master Plan	Campus VMT increases by 6.4% in 2030 compared to no project	Campus VMT/student decreases by 5.9% in 2030 compared to no project.
Gridley	General Plan	NA	NA
Oroville	General Plan CAP	NA NA	NA NA
Paradise	General Plan	NA	NA

Notes:
NA = Not Available.
* May have set expectation that VMT reduction should be consistent with OPR Technical Advisory recommendations.