



**COUNTY OF EL DORADO
DEPARTMENT OF TRANSPORTATION
INTEROFFICE MEMORANDUM**

Date: October 6, 2020
To: Board of Supervisors
From: Rafael Martinez, Director
Department of Transportation

Subject: Vehicle Miles Traveled, SB 743 Implementation Significance Thresholds

On September 22, 2020 the Board of Supervisors directed staff to revise the proposed Resolution 141-2020 entitled, "Adopting the El Dorado County "Vehicle Miles Traveled" Thresholds of Significance for Purposes of Analyzing Transportation Impacts Under the California Environmental Quality Act," to reflect the analysis area to be the Countywide average instead of the Community Region Boundary areas. Staff has updated Resolution 141-2020 consistent with that direction, and also wanted to provide the Board this memo to summarize how setting the analysis area to be the Countywide average will be consistent with SB 743.

The updated Resolution 141-2020 defines the "region" as the west slope of the County. The *El Dorado County and City of Placerville SB 743 Implementation Plan*, July 2019 includes data for the west slope County unincorporated area, but not data for the Tahoe Basin because that is under the jurisdiction of the Tahoe Regional Planning Agency for planning purposes. Accordingly, the Tahoe Basin is not included in the Countywide Average for purposes of establishing our thresholds of significance.

Using the Countywide average for setting of VMT thresholds supports the goals of SB 743 because, unlike delay-based LOS analyses, VMT is a regional effect not defined by roadway, intersection, or pathway. The Governor's office of planning and research (OPR) acknowledges this in its *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018, (Technical Advisory), (page 6), which states,

Lead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries....

The data collected by Fehr & Peers in the *SB 743 Implementation Plan* indicates that the El Dorado County General Plan includes VMT reduction goals. Generally, VMT averages are higher in the more rural areas of the County and the use of the Countywide average thereby encourages development in the community regions by establishing baseline averages that reflect the entire region. Encouraging development in the community regions thus supports the goal of SB 743 by encouraging infill development and is also consistent with the County's General Plan. Fehr & Peers also concluded in their *SB 743 Implementation Plan* that the El Dorado County General Plan and other travel behavior inputs from the region already establish a VMT Growth Budget and that this budget is captured in local and regional travel forecasting models.

Using the Countywide Average is also consistent with the Technical Advisory. In the Technical Advisory, the recommendations for thresholds for the primary land use types (residential and office) are based on a comparison to a regional average. Region is not defined further in the Technical Advisory. Instead, OPR offers the following suggestions:

- *In cases where the region is substantially larger than the geography over which most workers would be expected to live, it might be appropriate to refer to a smaller geography, such as **county**, that includes the area over which nearly all workers would be expected to live (page 16).*
- *For residential projects in unincorporated county areas, the local agency can compare a residential project's VMT to (1) the region's VMT per capita, or (2) the aggregate population weighted VMT per capita of all cities in the region (page 15).*

In the City of Fresno, the City hired the consulting firm LSA Associates, Inc. to prepare their *CEQA Guidelines for Vehicle Miles Traveled Thresholds*, June 2020. LSA surveyed other urbanized areas around the State to identify what region has been established for VMT thresholds. In most cases, the county boundary has been identified as the region selected for VMT analysis.

It should be recognized the use of the county as the region defines the comparative, or the denominator, in the identification of project-related impact. The numerator is the project's VMT contribution. This project-related VMT profile may go beyond the county boundary and not be truncated by a jurisdictional boundary. El Dorado County's Travel Demand Model has been updated to address this concern.

Additionally, OPR staff has confirmed there is a planned update to the Technical Advisory to clarify a region as the MPO (Metropolitan Planning Agency) or RTPA (Regional Transportation Planning Agency) for purposes of VMT thresholds. This tends to result in a region being set on county boundaries. For El Dorado County our MPO is the Sacramento Area Council of Governments (SACOG) and our RTPA is the El Dorado County Transportation Commission (EDCTC). EDCTC's is the regional transportation planning agency responsible for the west slope of El Dorado County within the SACOG region. Therefore, it is reasonable to set the region for purposes of VMT thresholds as the west slope of the unincorporated County of El Dorado.