

POLICY TOPIC PAPER 9.0: MOBILITY SYSTEM STANDARDS REVISED



BACKGROUND

As part of current practice under the California Environmental Quality Act (CEQA), the impact of a proposed project on vehicle level of service (LOS) has been a required component of environmental impact assessments. LOS measures the congestion level on a roadway segment or at an intersection(s) and is an indication of the comfort and convenience associated with driving. Relative levels of congestion are rated as A, B, C, D, E, or F. In general, LOS A represents free-flow conditions with no congestion, and LOS F represents severe congestion and delay under stop-and-go conditions.

Because LOS has been a required part of CEQA analysis, most general plans in California include policies setting minimum LOS for roadway segments and/or intersections. The current Elk Grove General Plan includes policies to achieve a minimum of LOS D on all roadways and intersection in Elk Grove at all times, with some allowances for certain roadways and intersections that do not currently meet this standard.¹

There are numerous concerns with using LOS alone as an environmental impact metric, such as the following:

- A focus on LOS values the free flow of vehicles above safety and the free flow of non-vehicular traffic;
- Vehicle miles traveled (VMT) and associated criteria air pollutant and greenhouse gas emissions are generally increased when using LOS as a standard for roadway function;
- Incentives to use transit and active transportation options are reduced;
- Maintaining acceptable LOS often means widening streets, which can have negative environmental and urban character impacts, and congested areas where street widening is infeasible continue to have unacceptable LOS, regardless of the standards; and
- Sprawl development is incentivized due to lower impacts to LOS relative to other potential metrics.

In 2013, the California legislature approved and Governor Jerry Brown signed Senate Bill (SB) 743, requiring the Governor's Office of Planning and Research (OPR) to revise the State CEQA Guidelines to replace LOS with an alternative method of transportation impact analyses. In response, OPR released a draft proposal (updated in January 2016) recommending updates to the State CEQA Guidelines using VMT as the preferred alternative metric for transportation impact analyses

¹ City of Elk Grove General Plan. 2008. Policies C-13 and C-14.

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(https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf). In this document, OPR also recommended CEQA significance thresholds for use by lead agencies, including a 15 percent target reduction in VMT for residential and office development projects. Once revisions to the State CEQA Guidelines are adopted, impacts to LOS will no longer be considered a significant environmental impact under CEQA. OPR does acknowledge that LOS may continue to be used for roadway planning purposes, but the use of VMT in CEQA analysis is a more accurate measure of the potential impacts on the environment. For example, VMT is directly linked to both greenhouse gas emissions analysis and criteria air pollutant analysis for emissions sources within the transportation sector, whereas LOS measures traffic throughput and driver comfort and convenience. It is important to note that OPR's recommended CEQA VMT significance thresholds for residential, office, commercial, mixed use and new roadway projects are proposed guidance and are not to be incorporated into the State CEQA Guidelines.

What is VMT?

A vehicle mile traveled, or VMT, represents one vehicle traveling on a roadway for 1 mile.

Regardless of how many people are in the vehicle, each vehicle traveling on a roadway generates one VMT for each mile it travels.

As the City approaches an update to the Circulation Element of the General Plan following the adoption of SB 743, the following policy options are available:

- Establish a locally-based VMT threshold for CEQA analysis
- Retain an LOS policy in the General Plan and Traffic Impact Analysis Guidelines
- Establish a roadway efficiency standard in the General Plan

The City may employ these strategies either individually or in combination. The following discussions illustrate potential tradeoffs associated with these options. Recommended policy approaches for City Council and Planning Commission discussion are presented at the conclusion of this topic paper.

Why Vehicle Miles Traveled?

Other methods of transportation impact analysis, such as automobile trips generated or multimodal level of service, may also be used to comply with SB 743. However, VMT is the most effective metric for accomplishing the goals of SB 743 due to its consistency with other statewide and regional goals, its relationship to actual environmental impacts (e.g., air quality, greenhouse gas emissions, noise), and its use as an indicator of roadway function. It is also currently used to support analysis of greenhouse gas emissions attributable to the transportation sector under CEQA. VMT has been a primary indicator of travel for policymakers and transportation professionals for decades, and it is effective for the following reasons:

- **Historical Data is Available.** VMT is relatively easy to measure by counting traffic on roadways at different locations. It is one of the few measures of transportation performance

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that has been consistently and comprehensively monitored and documented over time in the state and region.

- **Relationship to Vehicle Emissions.** VMT bears a direct relationship to vehicle emissions, although the relationship is complex. It can be used as an indicator for how well a jurisdiction meets greenhouse gas emissions targets. Models that measure VMT for greenhouse gas analyses are already used by many cities (including Elk Grove).
- **Responsiveness to Policy and Land Use Influence.** VMT can be influenced by policy in a number of ways, including by encouraging carpooling or mode shifts from vehicle use to walking, biking, and transit. Land use patterns can also directly affect VMT. Mixing residential, employment, education, and service uses in an area can allow people to accomplish their daily activities with less driving, resulting in less VMT.
- **Indicator of Roadway Function and Roadway Safety.** VMT correlates with traffic congestion and can also act as an indicator of roadway function. VMT also relates with the frequency of traffic collisions. Generally, the higher the VMT on a roadway, the greater exposure to motorists and other road users to more collision risk. This can provide additional valuable information to assist in prioritizing roadway improvements.
- **Benefits of VMT Analyses to Identify Transportation System Impacts.** Using VMT to measure transportation impacts under CEQA recognizes the value of alternative transportation options and balances the needs of vehicle travel with the needs of other modes of transportation. Benefits of using VMT to measure transportation system impacts include:
 - Reduced mitigation burden on infill projects, where new projects are more likely to trigger LOS impacts where roadways are already at capacity.
 - Reduced air quality, greenhouse gas emissions, and energy impacts related to associated reductions in VMT.
 - Project applicants are encouraged to reduce VMT through project location and design and by providing transit and active transportation incentives, rather than by widening roadways.

Existing and Planned Future Conditions

Under buildout of the current General Plan (including the Southeast Policy Area), VMT per capita (total VMT divided by population) is expected to *increase* by just under 20 percent compared to existing conditions, based on preliminary land use modeling. This is important, as OPR's recommendations include a 15 percent *reduction* from existing conditions as a threshold for significance under CEQA. However, it should also be noted that the 15 percent reduction would only be considered for new development projects. It does not represent a 15 percent reduction of Citywide VMT, and would not require changes to existing development to achieve the reduction. Nevertheless, achieving significant

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reductions in Citywide VMT is an important goal for the General Plan update, as it would enable future projects that are consistent with the General Plan to more readily meet their individual VMT reduction goals.

OPR is recommending the 15 percent reduction for a number of reasons. First, SB 743 identifies that criteria for determining the significance of transportation impacts must promote (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. Various policies have been established by the State to address quantitative reductions in greenhouse gas emissions, including:

- Assembly Bill 32, which requires statewide greenhouse gas reductions to 1990 levels by 2020, as well as continued reductions beyond 2020;
- Implementation by the California Air Resources Board in implementing SB 375 by setting targets for larger metropolitan planning organizations, such as SACOG, to reduce greenhouse gas by 13 to 16 percent by 2035;

ANALYSIS

As noted above, SB 743 required OPR to revise the State CEQA Guidelines to replace LOS with an alternative method of transportation impact analysis. OPR released a series of recommendations describing VMT as the preferred alternative method for evaluating transportation impacts under CEQA, and recommended a significance threshold targeted reduction of 15 percent in VMT. Cities and counties can still establish their own VMT significance thresholds that reflect local conditions and priorities, so long as such thresholds are based on substantial evidence. Most jurisdictions are considering the options available to comply with the anticipated revisions to the State CEQA Guidelines.

For Elk Grove, the General Plan update presents a key opportunity to establish locally relevant VMT standards, as alternative land use configurations are being considered and updated traffic studies are being conducted to support the process. Following are a number of questions the City should consider in establishing its VMT reduction policies:

- What baseline should be used to measure changes in VMT that would result from implementation of the General Plan and future proposed projects?
- What metrics should be used to measure VMT associated with implementation of the General Plan and future proposed projects?
- What thresholds of significance should the City establish to consider VMT impacts under CEQA?
- How might SB 743 potentially constrain the City's existing land use authority?
- Should the City retain LOS as a measure of transportation system performance and a means to ensure completion of future roadway improvements?

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- Should the City characterize the role and intended primary users of each major roadway and prioritize future safety, capacity, and access improvements according to these factors?

The following discussions present preliminary considerations related to these questions. This information may change based on further analysis of City land use and traffic alternatives and data, and any potential changes in OPR's recommendations.

Establishing a Baseline

SB 743 itself sets no local requirement to reduce VMT, but it does require that the method of transportation impact analysis selected in lieu of LOS promote greenhouse gas emissions reductions, use of multimodal transportation networks, and infill projects. OPR's recommended approach to meet this requirement is to establish a 15 percent reduction of VMT as a threshold of significance for proposed projects. To demonstrate a reduction in VMT, the City would need to establish a baseline value against which to analyze a project. OPR's draft approach includes no specific recommendation about what baseline should be used. The City would therefore need to establish an appropriate baseline for analysis.

Generally, the baseline for environmental analysis under CEQA is existing conditions at the time the environmental document is initiated. However, this would present a complicated "moving target" for VMT that results in a need for frequent analysis to establish the existing conditions at the time of project analysis. Using existing conditions at the time of project analysis also creates a situation where it will become increasingly difficult to achieve reductions as overall existing conditions improve. While OPR makes no specific recommendation about what baseline to use, selecting an alternative baseline would require the City to present substantial evidence describing why the use of an existing conditions, or moving target, baseline would not provide accurate or meaningful information.

Options for alternative baselines include, but are not limited to, the following:

- **Static 2015 Existing Conditions Baseline.** This baseline would not shift over time as VMT changes. Rather, it would establish 2015 conditions as the baseline for the VMT reductions required for new projects moving forward. 2015 is the most recent full year that VMT data has been collected for the region, which would make it an accurate static baseline to use if repeated analysis is not desired for each project. This baseline would apply to all proposed projects Citywide.
- **Static 2015 Existing Conditions Baseline by Land Use Type.** This baseline also would not shift over time as VMT changes and would use 2015 data. However, as land use mix and location are directly related to transportation patterns, it would be unreasonable to assume that VMT generated by one land use (e.g., low density residential with little or no services in the vicinity) would be equal to VMT generated by another land use (e.g., higher density residential uses located within walking distance to services and a transit stop). Establishing baselines that

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vary by land use type using land use designations established on the City's General Plan Land Use Map would allow more flexibility to consider the desirable characteristics of specific project types when preparing CEQA analyses, compared to a one-size-fits-all baseline across all land uses in the City.

Additionally, the City may consider establishing both a Citywide baseline, which would include VMT assigned to Elk Grove only, and a regional baseline, which would include VMT assigned across the Sacramento Area Council of Governments (SACOG) five-county region. While OPR's recommendations are silent on establishing baselines, they do provide a number of numeric significance thresholds to consider (see examples under Establishing Thresholds of Significance, below). The thresholds recognize that a particular project type may meet a threshold based on a Citywide baseline but not meet a threshold based on a regional baseline, or vice versa. OPR also recommends that significance thresholds be consistent with the relevant Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), suggesting jurisdictions establish at least a regional baseline. For Elk Grove's purposes, this would represent consistency with SACOG's 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (2016 MTP/SCS).

Establishing both a Citywide and regional baseline could provide additional flexibility in establishing thresholds of significance, particularly if there is an advantage to analyzing projects focused on serving the local community one way (e.g., a new neighborhood commercial center), while analyzing projects that would draw patrons from the region (e.g., a regional mall) another way. This also provides an opportunity for the City to consider additional significance thresholds that respond more appropriately to the local context.

It should be noted that Elk Grove's physical location in the region will have direct impacts on VMT. Certain types of development will attract users from throughout the region, rather than just the local market. For example, a new employment use that addresses the jobs-housing balance may have a high VMT impact if the employees for that use are coming from beyond the local labor pool as they could be driving from Folsom, Natomas, or Roseville. Similarly, residential uses with no opportunities for new employment will cause residents to commute outside the City for work. While this relationship between land use and circulation is critical and the development of a balanced land use pattern cannot be overstated, some level of VMT impact will occur and these impacts will need to be mitigated in a feasible way.

Establishing a Vehicle Miles Traveled Metric

The City has discretion to select a VMT metric that would provide the most appropriate measure of local conditions based on City goals. A variety of VMT metrics can be used to comply with OPR's recommended amendments to the State CEQA Guidelines. Each metric essentially considers the total VMT calculated within a defined area, such as the City of Elk Grove, and divides that total by a defined group of people, households, and/or jobs. For example, some common VMT metrics include:

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- **VMT per capita**, which is total VMT divided by total population in an area.
- **VMT per household**, which is total VMT divided by the total number of households in an area.
- **VMT per employee**, which is total VMT divided by the total number of jobs in an area.
- **VMT per service population**, which is total VMT divided by the total population plus jobs in an area.

Rather than identify one VMT metric to use for all projects Citywide, the City may consider using different VMT metrics for the various project types. This approach may be more relevant should the City choose to establish thresholds of significance by land use type, as discussed further below.

Establishing Thresholds of Significance

The City uses thresholds of significance to determine the potential extent of a proposed project's impacts to the environment under CEQA. A threshold of significance is an identifiable quantitative, qualitative, or performance level of a particular environmental effect. Levels of impacts include:

- **No impact or less than significant impact.** This level of impact does not require specific mitigation measures or preparation of an environmental impact report (EIR).
- **Less than significant impact with mitigation.** This level of impact requires specific mitigation measures, but may not require preparation of an EIR.
- **Significant impact.** This level of impact may require specific mitigation measures, and would require preparation of an EIR. If feasible mitigation is not available to reduce a significant impact to a less than significant level, the City Council may still approve a proposed project, but must find that specific benefits of the proposed project outweigh the unavoidable adverse environmental effects using a statement of overriding considerations.

Non-compliance with the threshold of significance means the effect of a proposed project will normally be determined to be significant by the City. Compliance with the threshold of significance means the effect of a proposed project normally will be determined to be less than significant by the City.

State CEQA Guidelines Section 15064.7 encourages local agencies to develop and publish thresholds of significance to evaluate proposed projects. Locally-based thresholds must be adopted by ordinance, resolution, rule, or regulation, through a public review process and supported by substantial evidence. The City may consider thresholds of significance adopted by other agencies or recommended by experts, provided these are supported by substantial evidence.

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Based on the direction established in SB 743, OPR has identified a number of recommendations for local agencies seeking to establish thresholds of significance for VMT. These recommendations are presented in the following table and described below.

Type of Threshold	Purpose	Level of Impact
Screening Threshold	<p>“Screens” projects from further analysis based on size or location. <i>Minimizes project-level analysis.</i></p>	<p><u>Below numeric threshold:</u></p> <ul style="list-style-type: none"> • Less than significant impact <p><u>Above numeric threshold:</u></p> <ul style="list-style-type: none"> • Needs project-specific analysis; subject to numeric thresholds
Numeric Threshold	<p>For projects that are not “screened” out, a numeric threshold is used to determine project impacts. <i>Requires project-specific analysis.</i></p>	<p><u>Below numeric threshold:</u></p> <ul style="list-style-type: none"> • Less than significant impact <p><u>Above numeric threshold:</u></p> <ul style="list-style-type: none"> • Requires mitigation • May require an EIR
Land Use Plan Threshold	<p>Thresholds may include consistency requirements (General Plan consistency or regional plan consistency) or may include numeric thresholds.</p>	<p><u>Below numeric threshold:</u></p> <ul style="list-style-type: none"> • Less than significant impact <p><u>Above numeric threshold:</u></p> <ul style="list-style-type: none"> • Requires mitigation • May require an EIR

Screening Thresholds

The following are considered screening thresholds, which are meant to recognize and screen out certain projects, which, due to their size or location, would be anticipated to have a less than significant impact to the transportation system.

- Small projects generating fewer trips than 100 trips per day can generally be assumed to cause a less than significant impact.
- Residential, retail, and office projects, as well as mixed-use projects featuring these uses, can be assumed to have a less than significant impact *if* they are located within one-half mile of an existing stop along a high-quality transit corridor, so long as factors such as a lack of sufficient density or excessive parking do not dispute this presumption.

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- Transportation projects that reduce or have no impact on vehicle miles traveled would be presumed to have a less than significant impact. If a project impact has already been analyzed at a plan-level impact, the lead agency may incorporate that analysis for reference. Examples of these types of projects include rehabilitation or maintenance projects that improve the condition of existing transportation facilities, a reduction in the number of through lanes on a street (a “road diet”), grade separation projects, roundabouts and traffic calming projects, bicycle trail improvements, new transit services, removal of off-street parking, and new lane additions less than 1/3 mile long, among others.

Establishing screening thresholds would allow the City to identify projects that may not require additional analysis under CEQA relative to transportation impacts. Aligning these thresholds with criteria used under other CEQA “infill” exemptions, as well as recognizing that land use mix and proximity to transit facilities should be considered, are beneficial.

In addition to criteria-based screening thresholds, as identified above, some jurisdictions (including the City of Sacramento) have developed map-based screening thresholds. Maps could identify areas in the City that are currently below the established VMT threshold based location, use types, and proximity to services and/or transportation. Certain project types may then be screened out from additional analysis if they would be located within one of the areas with desirable VMT characteristics identified on the map. It should be noted that map-screening thresholds are typically more applicable in denser locations, and may not be as effective or appropriate for Elk Grove.

Numeric Thresholds of Significance

OPR has also recommended a 15 percent VMT reduction threshold of significance for larger projects, which is meant to align VMT reductions with greenhouse gas emissions reduction targets adopted under SB 375. The following are considered numeric thresholds as they assign the target reduction of 15 percent from existing VMT levels (see discussion under Establishing a Baseline, above).

- Residential projects would have a less than significant impact if *either*:
 - City household VMT per capita is 15 percent below the baseline, or
 - Existing regional household VMT per capita is 15 percent below the baseline.
- Office projects would have a significance threshold of 15 percent below existing VMT per employee for the relevant geographic area (e.g., region, county).
- Retail projects would have a threshold of any net increase in total VMT in the area affected by the project. Mixed-use projects would be analyzed component-by-component and may receive credit for “internal capture.”

While any significance thresholds proposed should be tailored to feasible and appropriate steps for Elk Grove, the recommended OPR thresholds demonstrate that thresholds of significance may not be one-

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size-fits-all and can vary based on project type. This approach to establishing thresholds of significance recognizes varying baselines (Citywide versus regional) and varying metrics (VMT per household for residential projects and VMT per employment for office projects). It would be similar to a baseline by land use type approach, as discussed above.

The City may also consider establishing thresholds by land use type expressed in absolute terms (e.g., 55 daily VMT per household, 65 daily VMT per employee) as opposed to a percent reduction (e.g., 15 percent below existing VMT per household, 15 percent below existing VMT per employee). However, the ability of the City to establish an absolute threshold would be influenced by the type of baseline established (static versus a moving target).

Thresholds of Significance for Land Use Plans

In addition to project-specific thresholds of significance, OPR has recommended the following threshold for use in evaluating land use plans, including general plans, community plans, specific plans, and area plans.

- The adoption of land use plans should be consistent with the relevant RTP/SCS. Consistency with the SCS would be determined as follows:
 - 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.

Establishing thresholds for how land use plans should be analyzed is also a consideration the City needs to make. This is of particular importance for the proposed study areas beyond the current City limits, where area-wide land use plans may be required. While consistency with the RTP/SCS may be considered, it should not be the only determining factor for significance thresholds. As an example, it may be appropriate to provide some flexibility in determining significance if a land use plan meets established VMT reduction targets, but is not consistent with development identified in the SCS. At a minimum, consistency with the General Plan would be required for subsequent community plans, specific plans, and area plans.

Land Use Authority

As noted above, VMT is directly influenced by existing and planned land use patterns based on land use mix, density, location relative to services, and/or transit service. This places additional importance on the arrangement of future land uses in the Planning Area in order to achieve target reductions in VMT. Nothing in SB 743 directly affects the City's land use regulatory authority. However, because VMT and land use patterns are directly linked, establishing and adhering to VMT standards may place certain constraints on how the City is able to approve future land use projects.

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As an illustrative example, assume that the City may establish a VMT standard for future projects. If the City seeks in the future to approve a proposed project that would exceed the standard, the City may need to prepare an environmental impact report (EIR) identifying a potentially significant VMT impact, and identifying any feasible mitigation.

In order to identify potentially feasible mitigation, the City and project applicant may be required to consider strategies to adjust the proposed land use mix, density, location, and/or transportation amenities offered in order to reduce the project's VMT. Rather than traditional roadway widening and intersection improvement options, mitigation of transportation impacts would likely include enhancing the availability of high-quality transit, including alternative transportation features (e.g., bike paths, trail connections, enhanced pedestrian routes) in project designs, and/or employing transportation demand management solutions (e.g., parking limitations, transit pass subsidies, bicycle parking). If none of these strategies was determined to be feasible or to reduce the impact to a less than significant level, the City could still approve the project, but would be required to identify the impact as significant and unavoidable, and adopt a statement of overriding considerations.

Prior to SB 743, such a project could have created unacceptable LOS conditions at one or more intersections that could have required potential roadway widening or intersection improvements to mitigate a significant impact under CEQA. Subsequent to SB 743, the unacceptable LOS conditions would not be considered significant impacts under CEQA, and the potential widening or intersection improvements would not be available as mitigation measures. The City could still require such improvements if an LOS policy was retained in the General Plan and Traffic Impact Analysis Guidelines. However, such improvements would not be required as mitigation measures under CEQA.

Considering the dynamics of this example, and factors describing Elk Grove's location at the edge of the Sacramento metropolitan region and the City's current jobs-housing ratio (further outlined in Policy Topic Paper 7.0, Jobs/Housing), the City should anticipate that certain future projects with VMT characteristics that exceed City-wide or region-wide levels may trigger preparation of an EIR and potentially adoption of a statement of overriding considerations, where they may not under current procedures. This would also require consideration and disclosure of alternatives to the proposed project, would expand the typical process for public and agency comments and responses, and could expand the potential for legal challenges on such projects. The City should also anticipate that the range of potential mitigation measures it requires applicants to consider will include land use factors such as location, density, and use mix, in addition to providing options for high-quality transit, alternative transportation, and transportation demand management. In these ways, although SB 743 focuses primarily on transportation impacts, it can also be viewed as a potential constraint to the City's existing land use authority.

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Retaining Level of Service

While the use of LOS will no longer be a component of transportation impact analysis under CEQA, the option to retain this measurement for planning purposes is available. It may still be beneficial to require LOS as a project review requirement for the purposes of traffic mitigation, intersection safety, roadway impact fee determination, and street capacity and sizing determinations. If established in the General Plan, consistency with LOS standards would be considered a matter of General Plan consistency.

To implement General Plan LOS policies and determine the significance of project impacts to LOS, the City of Elk Grove established Traffic Impact Analysis Guidelines in July 2000. An impact to an intersection is considered significant, and mitigation measures must be identified when:

- Traffic generated by the project degrades the LOS from an acceptable LOS D or better (without the project) to an unacceptable LOS E or F (with the project).
- LOS (without project) is unacceptable and project-generated traffic increases the control delay by more than five seconds.
- For bicycle/pedestrian facilities: implementation of the project will disrupt or interfere with existing or planned bicycle or pedestrian facilities.
- For freeway facilities: the project causes the facility to change from acceptable to unacceptable LOS.
 - For facilities, which are or will be (in the cumulative condition) operating at unacceptable LOS without the project: increases the volume-to-capacity ratio on a freeway mainline segment or freeway ramp junction by 0.05.
 - Increase the number of peak hour vehicles on a freeway mainline segment or freeway ramp junction by more than 5 percent.
- For transit facilities: the project will disrupt or interfere with existing or planned transit operations or transit facilities.

These criteria are used for project analysis under CEQA. They also establish necessary roadway improvements when evaluating projects. Although these criteria can no longer be considered as part of environmental review for transportation impacts, they should be maintained as part of the planning review process. However, the City needs to consider if the LOS policies will be retained in the General Plan, and, if so, how the LOS policies are implemented, particularly in conjunction with any new VMT reduction policies. This is necessary to ensure that roadway improvements completed in response to LOS policies do not conflict with VMT goals, greenhouse gas reduction goals, or other goals of the General Plan.

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Roadway Efficiency Standards

A potential alternative approach to establishing LOS policies in the General Plan would be to identify the roles and intended primary users of each major roadway in the City, then establish priorities for future safety, capacity, and access improvements for each major roadway that fulfills the needs of the primary users.

For example, certain arterial roadways (e.g., Elk Grove Boulevard, Bruceville Road) are designed and intended to carry primarily vehicular traffic to and from regional routes and collector roadways through a suburban environment. While these roadways also provide facilities to support alternative modes (e.g., walking or bicycling) and public transit, these modes are inherently subservient to vehicle use on these corridors. Future safety, capacity, and access improvements along these roadways should be prioritized for vehicles. Conversely, other roadways could be designed and/or function to support alternative modes and public transit at levels similar to vehicles. Along these roadways, improvements could be prioritized to support alternative modes and public transit.

The City could designate each major roadway in the General Plan according to its intended function and priority users as a matter of policy. Using this information, a range of priority improvements for each roadway could be determined in advance that would improve the efficiency of each roadway for each priority user. Future proposed projects that impact each roadway could then be required to make a fair-share contribution to complete the pre-determined projects. Such improvements would need to be completed in a manner that balances the role and function of the subject roadway, character of the surrounding area, cost to complete the improvement, and ongoing maintenance obligations.

SUMMARY RECOMMENDATIONS

Based on the discussion contained in this policy topic paper, staff recommends the following items for consideration. Commission and Council direction on these items will be consolidated with that provided on other key policy topics to inform the direction and contents of the draft General Plan.

Policy Topic 9.0: Mobility System Standards

9.1. Direct staff to establish a land use type-based approach to setting VMT reduction targets, recognizing that alternatives to this approach may be recommended based on further analysis to determine the feasibility of implementing one or more components of the approach. Steps to establish a land use type-based approach would include:

- Establish a 2015 static baseline based on existing conditions at the Citywide level and the 5-county, SACOG regional level.
- Identify appropriate VMT metrics for use by project type (e.g., single-family residential, multiple-family residential, commercial, office).

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- Identify an absolute threshold of significance for each project type within each land use designation (e.g., Low Density Residential, Community Commercial, Employment Center, Village Mixed Use) by land use type, with a target of consistency with SACOG MTP/SCS regional VMT goals.
 - Recommend criteria-based screening thresholds appropriate to Elk Grove to screen out projects that would be presumed to have a less than significant impact from further transportation system analysis under CEQA.
 - Establish criteria for analysis of future community plans, specific plans, and area plans that may include, but not be limited to, consistency with the General Plan and consistency with the 2016 MTP/SCS.
- 9.2 Direct staff to prepare a new policy on roadway efficiency that replaces LOS. The new policy would identify that the City desires a robust and efficient roadway network that provides access to properties in a safe and convenient manner, but that the design of specific intersection and roadway segment improvements should balance these needs with the role and function of the subject roadway, character of the surrounding area, cost to complete the improvement, and ongoing maintenance obligations.
- 9.3 Direct staff to submit a proposal for VMT-based CEQA significance thresholds that are aligned with the policies and targets identified in the draft General Plan.
- 9.4 Direct staff to prepare revisions to the Citywide Roadway Fee Program that is aligned with the updated policies, targets, and roadway improvements identified in the draft General Plan. Under this approach, the Roadway Fee Program would function as a “fair-share” funding mechanism for roadway improvements and not as a CEQA mitigation program.
- 9.5 Direct staff to develop options for mitigation of VMT impacts that are viable in the local context. Potential measures identified by OPR that may be applicable include increasing access to high-quality transit, improved pedestrian and bicycle networks, commute reduction programs, and increased connectivity to the project site.