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Subject: Public Comment -- 5/26/21 PC Mtg, Item No. 6A, Grocery Outlet
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Attachments: [OPR VMT Technical Advisory.pdf](#)

Planning Commission,

This comment is limited to the adequacy of the draft IS/MND for this project and does not address the merits of the proposed entitlements. Since positions taken need to be supported by substantial evidence in the administrative record for a project, I thought I would submit the California Office of Planning Research's Technical Advisory on how to calculate Vehicle Miles Travelled (VMT) analysis for CEQA purposes (attached). The lack of any actual VMT analysis concerning the potentially significant traffic and transportation impacts is a fatal flaw in the draft IS/MND for this project and you would be abusing your discretion to certify/adopt it without directing staff to have the consultant revise the CEQA document to include VMT analysis.

As you can see in the attached, VMT analysis requires data and actual calculations (e.g., the use of modelling) just as Level of Service (LOS) analysis does. The traffic study performed extensive LOS analysis but did not actually include any meaningful VMT analysis using available data. As such, anyone who cares about following the law must object to the draft IS/MND in its current form. (Please note that this is not the only required content in the draft IS/MND that has been omitted and I direct your attention to the comments on the IS/MND for other omissions. This is significant because even if you are otherwise inclined to approve the requested permits, you cannot do so without first certifying a legally adequate IS/MND or EIR for this project and the current draft IS/MND fails to include specific content that is required.

On a somewhat related but equally significant note, the OPR Technical Advisory notes that thresholds of significance are required for each impact area and that thresholds require "an identifiable quantitative, qualitative or performance level of a particular environmental effect." (See, e.g., p. 8.) As mentioned in the comments on the draft IS/MND, it fails to establish or apply thresholds of significance in many impact areas so the purported "conclusions" that these impact areas are less than significant are inadequate because one cannot determine if an impact is actually significant or reduced to less than significance with mitigation without having a threshold of significance by which that impact area is evaluated. This must be remedies for all impact areas evaluated in the IS/MND prior to its adoption by the City.

Regards,

--Jacob

TECHNICAL ADVISORY

ON EVALUATING TRANSPORTATION IMPACTS IN CEQA



December 2018

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A. Introduction

This technical advisory is one in a series of advisories provided by the Governor’s Office of Planning and Research (OPR) as a service to professional planners, land use officials, and CEQA practitioners. OPR issues technical assistance on issues that broadly affect the practice of land use planning and the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). (Gov. Code, § 65040, subs. (g), (l), (m).) The purpose of this document is to provide advice and recommendations, which agencies and other entities may use at their discretion. This document does not alter lead agency discretion in preparing environmental documents subject to CEQA. This document should not be construed as legal advice.

[Senate Bill 743](#) (Steinberg, 2013), which was codified in Public Resources Code section 21099, required changes to the guidelines implementing CEQA (CEQA Guidelines) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. As one appellate court recently explained: “During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy” (*Covina Residents for Responsible Development v. City of Covina* (2018) 21 Cal.App.5th 712, 729.) Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (*Id.*, subd. (b)(1); see generally, adopted CEQA Guidelines, § 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (Agency) has certified and adopted, changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project’s transportation impacts. With the California Natural Resources Agency’s certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by “level of service” and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).)

This advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. Again, OPR provides this Technical Advisory as a resource for the public to use at their discretion. OPR is not enforcing or attempting to enforce any part of the recommendations contained herein. (Gov. Code, § 65035 [“It is not the intent of the Legislature to vest in the Office of Planning and Research any direct operating or regulatory powers over land use, public works, or other state, regional, or local projects or programs.”].)

This December 2018 technical advisory is an update to the advisory it published in April 2018. OPR will continue to monitor implementation of these new provisions and may update or supplement this advisory in response to new information and advancements in modeling and methods.

B. Background

VMT and Greenhouse Gas Emissions Reduction. Senate Bill 32 (Pavley, 2016) requires California to reduce greenhouse gas (GHG) emissions 40 percent below 1990 levels by 2030, and Executive Order B-16-12 provides a target of 80 percent below 1990 emissions levels for the transportation sector by 2050. The transportation sector has three major means of reducing GHG emissions: increasing vehicle efficiency, reducing fuel carbon content, and reducing the amount of vehicle travel. The California Air Resources Board (CARB) has provided a path forward for achieving these emissions reductions from the transportation sector in its 2016 Mobile Source Strategy. CARB determined that it will not be possible to achieve the State's 2030 and post-2030 emissions goals without reducing VMT growth. Further, in its 2018 Progress Report on California's Sustainable Communities and Climate Protection Act, CARB found that despite the State meeting its 2020 climate goals, "emissions from statewide passenger vehicle travel per capita [have been] increasing and going in the wrong direction," and "California cannot meet its [long-term] climate goals without curbing growth in single-occupancy vehicle activity."¹ CARB also found that "[w]ith emissions from the transportation sector continuing to rise despite increases in fuel efficiency and decreases in the carbon content of fuel, California will not achieve the necessary greenhouse gas emissions reductions to meet mandates for 2030 and beyond without significant changes to how communities and transportation systems are planned, funded, and built."²

Thus, to achieve the State's long-term climate goals, California needs to reduce per capita VMT. This can occur under CEQA through VMT mitigation. Half of California's GHG emissions come from the transportation sector³, therefore, reducing VMT is an effective climate strategy, which can also result in co-benefits.⁴ Furthermore, without early VMT mitigation, the state may follow a path that meets GHG targets in the early years, but finds itself poorly positioned to meet more stringent targets later. For example, in absence of VMT analysis and mitigation in CEQA, lead agencies might rely upon verifiable offsets for GHG mitigation, ignoring the longer-term climate change impacts resulting from land use development and infrastructure investment decisions. As stated in CARB's 2017 Scoping Plan:

"California's future climate strategy will require increased focus on integrated land use planning to support livable, transit-connected communities, and conservation of agricultural and other lands. Accommodating population and economic growth through travel- and energy-efficient land use provides GHG-efficient growth, reducing GHGs from both transportation and building energy use. GHGs can be further reduced at the project level through implementing energy-efficient construction and travel demand management approaches."⁵ (*Id.* at p. 102.)

¹ California Air Resources Board (Nov. 2018) *2018 Progress Report on California's Sustainable Communities and Climate Protection Act*, pp. 4, 5, available at https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf.

² *Id.*, p. 28.

³ See <https://ca50million.ca.gov/transportation/>

⁴ Fang et al. (2017) *Cutting Greenhouse Gas Emissions Is Only the Beginning: A Literature Review of the Co-Benefits of Reducing Vehicle Miles Traveled*.

⁵ California Air Resources Board (Nov. 2017) *California's 2017 Climate Change Scoping Plan*, p. 102, available at https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

In light of this, the 2017 Scoping Plan describes and quantifies VMT reductions needed to achieve our long-term GHG emissions reduction goals, and specifically points to the need for statewide deployment of the VMT metric in CEQA:

“Employing VMT as the metric of transportation impact statewide will help to ensure GHG reductions planned under SB 375 will be achieved through on-the-ground development, and will also play an important role in creating the additional GHG reductions needed beyond SB 375 across the State. Implementation of this change will rely, in part, on local land use decisions to reduce GHG emissions associated with the transportation sector, both at the project level, and in long-term plans (including general plans, climate action plans, specific plans, and transportation plans) and supporting sustainable community strategies developed under SB 375.”⁶

VMT and Other Impacts to Health and Environment. VMT mitigation also creates substantial benefits (sometimes characterized as “co-benefits” to GHG reduction) in both in the near-term and the long-term. Beyond GHG emissions, increases in VMT also impact human health and the natural environment. Human health is impacted as increases in vehicle travel lead to more vehicle crashes, poorer air quality, increases in chronic diseases associated with reduced physical activity, and worse mental health. Increases in vehicle travel also negatively affect other road users, including pedestrians, cyclists, other motorists, and many transit users. The natural environment is impacted as higher VMT leads to more collisions with wildlife and fragments habitat. Additionally, development that leads to more vehicle travel also tends to consume more energy, water, and open space (including farmland and sensitive habitat). This increase in impermeable surfaces raises the flood risk and pollutant transport into waterways.⁷

VMT and Economic Growth. While it was previously believed that VMT growth was a necessary component of economic growth, data from the past two decades shows that economic growth is possible without a concomitant increase in VMT. (Figure 1.) Recent research shows that requiring development projects to mitigate LOS may actually reduce accessibility to destinations and impede economic growth.^{8,9}

⁶ *Id.* at p. 76.

⁷ Fang et al. (2017) *Cutting Greenhouse Gas Emissions Is Only the Beginning: A Literature Review of the Co-Benefits of Reducing Vehicle Miles Traveled*, available at https://ncst.ucdavis.edu/wp-content/uploads/2017/03/NCST-VMT-Co-Benefits-White-Paper_Fang_March-2017.pdf.

⁸ Haynes et al. (Sept. 2015) *Congested Development: A Study of Traffic Delays, Access, and Economic Activity in Metropolitan Los Angeles*, available at http://www.its.ucla.edu/wp-content/uploads/sites/6/2015/11/Haynes_Congested-Development_1-Oct-2015_final.pdf.

⁹ Osman et al. (Mar. 2016) *Not So Fast: A Study of Traffic Delays, Access, and Economic Activity in the San Francisco Bay Area*, available at http://www.its.ucla.edu/wp-content/uploads/sites/6/2016/08/Taylor-Not-so-Fast-04-01-2016_final.pdf.

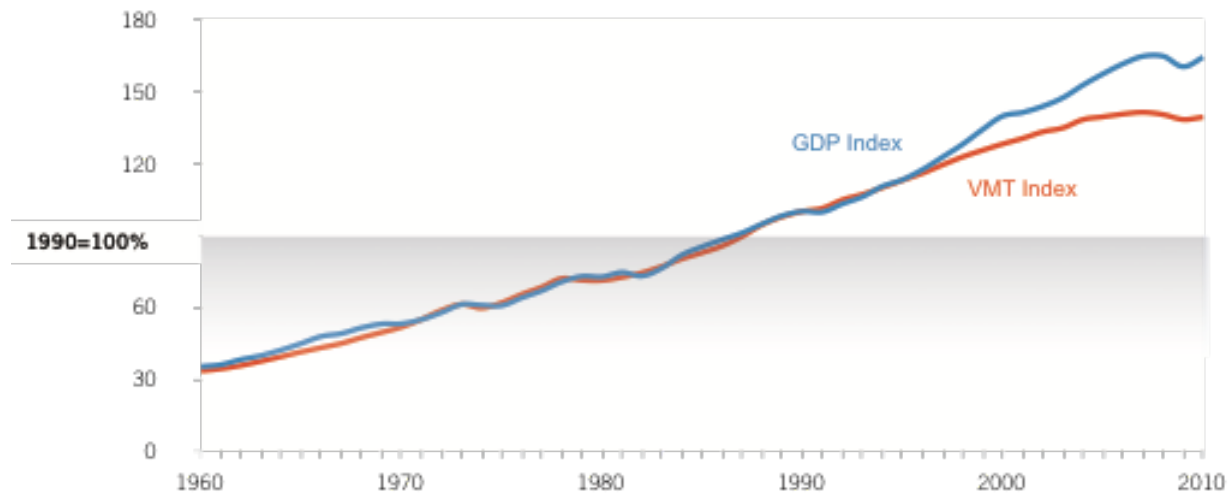


Figure 1. Kooshian and Winkelman (2011) *VMT and Gross Domestic Product (GDP), 1960-2010*.

C. Technical Considerations in Assessing Vehicle Miles Traveled

Many practitioners are familiar with accounting for VMT in connection with long-range planning, or as part of the CEQA analysis of a project’s greenhouse gas emissions or energy impacts. This document provides technical information on how to assess VMT as part of a transportation impacts analysis under CEQA. Appendix 1 provides a description of which VMT to count and options on how to count it. Appendix 2 provides information on induced travel resulting from roadway capacity projects, including the mechanisms giving rise to induced travel, the research quantifying it, and information on additional approaches for assessing it.

1. Recommendations Regarding Methodology

Proposed Section 15064.3 explains that a “lead agency may use models to estimate a project’s vehicle miles traveled . . .” CEQA generally defers to lead agencies on the choice of methodology to analyze impacts. (*Santa Monica Baykeeper v. City of Malibu* (2011) 193 Cal.App.4th 1538, 1546; see *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 409 [“the issue is not whether the studies are irrefutable or whether they could have been better” ... rather, the “relevant issue is only whether the studies are sufficiently credible to be considered” as part of the lead agency’s overall evaluation].) This section provides suggestions to lead agencies regarding methodologies to analyze VMT associated with a project.

Vehicle Types. Proposed Section 15064.3, subdivision (a), states, “For the purposes of this section, ‘vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project.” Here, the term “automobile” refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT). For an apples-to-apples

comparison, vehicle types considered should be consistent across project assessment, significance thresholds, and mitigation.

Residential and Office Projects. Tour- and trip-based approaches¹⁰ offer the best methods for assessing VMT from residential/office projects and for comparing those assessments to VMT thresholds. These approaches also offer the most straightforward methods for assessing VMT reductions from mitigation measures for residential/office projects. When available, tour-based assessment is ideal because it captures travel behavior more comprehensively. But where tour-based tools or data are not available for all components of an analysis, a trip-based assessment of VMT serves as a reasonable proxy.

Models and methodologies used to calculate thresholds, estimate project VMT, and estimate VMT reduction due to mitigation should be comparable. For example:

- A tour-based assessment of project VMT should be compared to a tour-based threshold, or a trip-based assessment to a trip-based VMT threshold.
- Where a travel demand model is used to determine thresholds, the same model should also be used to provide trip lengths as part of assessing project VMT.
- Where only trip-based estimates of VMT reduction from mitigation are available, a trip-based threshold should be used, and project VMT should be assessed in a trip-based manner.

When a trip-based method is used to analyze a residential project, the focus can be on home-based trips. Similarly, when a trip-based method is used to analyze an office project, the focus can be on home-based work trips.

When tour-based models are used to analyze an office project, either employee work tour VMT or VMT from all employee tours may be attributed to the project. This is because workplace location influences overall travel. For consistency, the significance threshold should be based on the same metric: either employee work tour VMT or VMT from all employee tours.

For office projects that feature a customer component, such as a government office that serves the public, a lead agency can analyze the customer VMT component of the project using the methodology for retail development (see below).

Retail Projects. Generally, lead agencies should analyze the effects of a retail project by assessing the change in total VMT¹¹ because retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns.

¹⁰ See Appendix 1, *Considerations About Which VMT to Count*, for a description of these approaches.

¹¹ See Appendix 1, *Considerations About Which VMT to Count*, “Assessing Change in Total VMT” section, for a description of this approach.

Considerations for All Projects. Lead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries, for example, by failing to count the portion of a trip that falls outside the jurisdiction or by discounting the VMT from a trip that crosses a jurisdictional boundary. CEQA requires environmental analyses to reflect a “good faith effort at full disclosure.” (CEQA Guidelines, § 15151.) Thus, where methodologies exist that can estimate the full extent of vehicle travel from a project, the lead agency should apply them to do so. Where those VMT effects will grow over time, analyses should consider both a project’s short-term and long-term effects on VMT.

Combining land uses for VMT analysis is not recommended. Different land uses generate different amounts of VMT, so the outcome of such an analysis could depend more on the mix of uses than on their travel efficiency. As a result, it could be difficult or impossible for a lead agency to connect a significance threshold with an environmental policy objective (such as a target set by law), inhibiting the CEQA imperative of identifying a project’s significant impacts and providing mitigation where feasible. Combining land uses for a VMT analysis could streamline certain mixes of uses in a manner disconnected from policy objectives or environmental outcomes. Instead, OPR recommends analyzing each use separately, or simply focusing analysis on the dominant use, and comparing each result to the appropriate threshold. Recommendations for methods of analysis and thresholds are provided below. In the analysis of each use, a mixed-use project should take credit for internal capture.

Any project that includes in its geographic bounds a portion of an existing or planned Transit Priority Area (i.e., the project is within a ½ mile of an existing or planned major transit stop or an existing stop along a high quality transit corridor) may employ VMT as its primary metric of transportation impact for the entire project. (See Pub. Resources Code, § 21099, subds. (a)(7), (b)(1).)

Cumulative Impacts. A project’s cumulative impacts are based on an assessment of whether the “incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” (Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).) When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance. (See *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 219, 223; CEQA Guidelines, § 15064, subd. (h)(3).)

D. General Principles to Guide Consideration of VMT

SB 743 directs OPR to establish specific “criteria for determining the significance of transportation impacts of projects[.]” (Pub. Resources Code, § 21099, subd. (b)(1).) In establishing this criterion, OPR was guided by the general principles contained within CEQA, the CEQA Guidelines, and applicable case law.

To assist in the determination of significance, many lead agencies rely on “thresholds of significance.” The CEQA Guidelines define a “threshold of significance” to mean “an identifiable **quantitative, qualitative¹² or performance level** of a particular environmental effect, non-compliance with which means the effect will **normally** be determined to be significant by the agency and compliance with which means the effect **normally** will be determined to be less than significant.” (CEQA Guidelines, § 15064.7, subd. (a) (emphasis added).) Lead agencies have discretion to develop and adopt their own, or rely on thresholds recommended by other agencies, “provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.” (*Id.* at subd. (c); *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) Substantial evidence means “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.” (*Id.* at § 15384 (emphasis added); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-1109.)

Additionally, the analysis leading to the determination of significance need not be perfect. The CEQA Guidelines describe the standard for adequacy of environmental analyses:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to **make a decision which intelligently takes account of environmental consequences**. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is **reasonably feasible**. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The **courts have looked not for perfection** but for **adequacy, completeness**, and a **good faith effort** at full disclosure.

(CEQA Guidelines, § 15151 (emphasis added).)

These general principles guide OPR’s recommendations regarding thresholds of significance for VMT set forth below.

¹² Generally, qualitative analyses should only be conducted when methods do not exist for undertaking a quantitative analysis.

E. Recommendations Regarding Significance Thresholds

As noted above, lead agencies have the discretion to set or apply their own thresholds of significance. (*Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 218-223 [lead agency had discretion to use compliance with AB 32's emissions goals as a significance threshold]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th at p. 1068.) However, Section 21099 of the Public Resources Code states that the 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. It further directed OPR to prepare and develop criteria for determining significance. (Pub. Resources Code, § 21099, subd. (b)(1).) This section provides OPR's suggested thresholds, as well as considerations for lead agencies that choose to adopt their own

The VMT metric can support the three statutory goals: “the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (Pub. Resources Code, § 21099, subd. (b)(1), emphasis added.) However, in order for it to promote and support all three, lead agencies should select a significance threshold that aligns with state law on all three. State law concerning the development of multimodal transportation networks and diversity of land uses requires planning for and prioritizing increases in complete streets and infill development, but does not mandate a particular depth of implementation that could translate into a particular threshold of significance. Meanwhile, the State has clear quantitative targets for GHG emissions reduction set forth in law and based on scientific consensus, and the depth of VMT reduction needed to achieve those targets has been quantified. Tying VMT thresholds to GHG reduction also supports the two other statutory goals. Therefore, to ensure adequate analysis of transportation impacts, OPR recommends using quantitative VMT thresholds linked to GHG reduction targets when methods exist to do so.

Various legislative mandates and state policies establish quantitative greenhouse gas emissions reduction targets. For example:

- Assembly Bill 32 (2006) requires statewide GHG emissions reductions to 1990 levels by 2020 and continued reductions beyond 2020.
- Senate Bill 32 (2016) requires at least a 40 percent reduction in GHG emissions from 1990 levels by 2030.
- Pursuant to Senate Bill 375 (2008), the California Air Resources Board GHG emissions reduction targets for metropolitan planning organizations (MPOs) to achieve based on land use patterns and transportation systems specified in Regional Transportation Plans and Sustainable Community Strategies (RTP/SCS). Current targets for the State's largest MPOs call for a 19 percent reduction in GHG emissions from cars and light trucks from 2005 emissions levels by 2035.
- Executive Order B-30-15 (2015) sets a GHG emissions reduction target of 40 percent below 1990 levels by 2030.

- Executive Order S-3-05 (2005) sets a GHG emissions reduction target of 80 percent below 1990 levels by 2050.
- Executive Order B-16-12 (2012) specifies a GHG emissions reduction target of 80 percent below 1990 levels by 2050 specifically for transportation.
- Executive Order B-55-18 (2018) established an additional statewide goal of achieving carbon neutrality as soon as possible, but no later than 2045, and maintaining net negative emissions thereafter. It states, “The California Air Resources Board shall work with relevant state agencies to develop a framework for implementation and accounting that tracks progress toward this goal.”
- Senate Bill 391 requires the California Transportation Plan to support 80 percent reduction in GHGs below 1990 levels by 2050.
- The California Air Resources Board Mobile Source Strategy (2016) describes California’s strategy for containing air pollutant emissions from vehicles, and quantifies VMT growth compatible with achieving state targets.
- The California Air Resources Board’s 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California’s 2030 Greenhouse Gas Target describes California’s strategy for containing GHG emissions from vehicles, and quantifies VMT growth compatible with achieving state targets.

Considering these various targets, the California Supreme Court observed:

Meeting our statewide reduction goals does not preclude all new development. Rather, the Scoping Plan ... assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians.

(Center for Biological Diversity v. California Dept. of Fish & Wildlife, supra, 62 Cal.4th at p. 220.) Indeed, the Court noted that when a lead agency uses consistency with climate goals as a way to determine significance, particularly for long-term projects, the lead agency must consider the project’s effect on meeting long-term reduction goals. *(Ibid.)* And more recently, the Supreme Court stated that “CEQA requires public agencies . . . to ensure that such analysis stay in step with evolving scientific knowledge and state regulatory schemes.” *(Cleveland National Forest Foundation v. San Diego Assn. of Governments (2017) 3 Cal.5th 497, 504.)*

Meeting the targets described above will require substantial reductions in existing VMT per capita to curb GHG emissions and other pollutants. But targets for overall GHG emissions reduction do not translate directly into VMT thresholds for individual projects for many reasons, including:

- Some, but not all, of the emissions reductions needed to achieve those targets could be accomplished by other measures, including increased vehicle efficiency and decreased fuel carbon content. The CARB’s *First Update to the Climate Change Scoping Plan* explains:

“Achieving California’s long-term criteria pollutant and GHG emissions goals will require four strategies to be employed: (1) improve vehicle efficiency and develop zero emission technologies, (2) reduce the carbon content of fuels and provide market support to get these lower-carbon fuels into the marketplace, (3) **plan and build communities to reduce vehicular GHG emissions and provide more transportation options, and (4) improve the efficiency and throughput of existing transportation systems.**”¹³ CARB’s *2018 Progress Report on California’s Sustainable Communities and Climate Protection Act* states on page 28 that “California cannot meet its climate goals without curbing growth in single-occupancy vehicle activity.” In other words, vehicle efficiency and better fuels are necessary, but insufficient, to address the GHG emissions from the transportation system. Land use patterns and transportation options also will need to change to support reductions in vehicle travel/VMT.

- New land use projects alone will not sufficiently reduce per-capita VMT to achieve those targets, nor are they expected to be the sole source of VMT reduction.
- Interactions between land use projects, and also between land use and transportation projects, existing and future, together affect VMT.
- Because location within the region is the most important determinant of VMT, in some cases, streamlining CEQA review of projects in travel efficient locations may be the most effective means of reducing VMT.
- When assessing climate impacts of some types of land use projects, use of an efficiency metric (e.g., per capita, per employee) may provide a better measure of impact than an absolute numeric threshold. (*Center for Biological Diversity, supra.*)

Public Resources Code section 21099 directs OPR to propose criteria for determining the significance of transportation impacts. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in selecting a significance threshold that may be appropriate for their particular projects. While OPR’s Technical Advisory is not binding on public agencies, CEQA allows lead agencies to “consider thresholds of significance . . . recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence.” (CEQA Guidelines, § 15064.7, subd. (c).) Based on OPR’s extensive review of the applicable research, and in light of an assessment by the California Air Resources Board quantifying the need for VMT reduction in order to meet the State’s long-term climate goals, **OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold.**

Fifteen percent reductions in VMT are achievable at the project level in a variety of place types.¹⁴

Moreover, a fifteen percent reduction is consistent with SB 743’s direction to OPR to select a threshold that will help the State achieve its climate goals. As described above, section 21099 states that the

¹³ California Air Resources Board (May 2014) *First Update to the Climate Change Scoping Plan*, p. 46 (emphasis added).

¹⁴ CAPCOA (2010) *Quantifying Greenhouse Gas Mitigation Measures*, p. 55, available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

criteria for determining significance must “promote the reduction in greenhouse gas emissions.” In its document *California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals*¹⁵, CARB assesses VMT reduction per capita consistent with its evidence-based modeling scenario that would achieve State climate goals of 40 percent GHG emissions reduction from 1990 levels by 2030 and 80 percent GHG emissions reduction levels from 1990 by 2050. Applying California Department of Finance population forecasts, CARB finds per-capita light-duty vehicle travel would need to be approximately 16.8 percent lower than existing, and overall per-capita vehicle travel would need to be approximately 14.3 percent lower than existing levels under that scenario. Below these levels, a project could be considered low VMT and would, on that metric, be consistent with 2017 Scoping Plan Update assumptions that achieve climate state climate goals.

CARB finds per capita vehicle travel would need to be kept below what today’s policies and plans would achieve.

CARB’s assessment is based on data in the 2017 Scoping Plan Update and 2016 Mobile Source Strategy. In those documents, CARB previously examined the relationship between VMT and the state’s GHG emissions reduction targets. The Scoping Plan finds:

“While the State can do more to accelerate and incentivize these local decisions, local actions that reduce VMT are also necessary to meet transportation sector-specific goals and achieve the 2030 target under SB 32. Through developing the Scoping Plan, CARB staff is more convinced than ever that, in addition to achieving GHG reductions from cleaner fuels and vehicles, California must also reduce VMT. Stronger SB 375 GHG reduction targets will enable the State to make significant progress toward needed reductions, but alone will not provide the VMT growth reductions needed; there is a gap between what SB 375 can provide and what is needed to meet the State’s 2030 and 2050 goals.”¹⁶

Note that, at present, consistency with RTP/SCSs does not necessarily lead to a less-than-significant VMT impact.¹⁷ As the Final 2017 Scoping Plan Update states,

VMT reductions are necessary to achieve the 2030 target and must be part of any strategy evaluated in this Plan. Stronger SB 375 GHG reduction targets will enable the State to make significant progress toward this goal, but alone will not provide all of the VMT growth reductions that will be needed. There is a gap between what SB 375 can provide and what is needed to meet the State’s 2030 and 2050 goals.”¹⁸

¹⁵ California Air Resources Board (Jan. 2019) *California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals*, available at <https://ww2.arb.ca.gov/resources/documents/carb-2017-scoping-plan-identified-vmt-reductions-and-relationship-state-climate>.

¹⁶ California Air Resources Board (Nov. 2017) *California’s 2017 Climate Change Scoping Plan*, p. 101.

¹⁷ California Air Resources Board (Feb. 2018) *Updated Final Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets*, Figure 3, p. 35, available at https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf.

¹⁸ California Air Resources Board (Nov. 2017) *California’s 2017 Climate Change Scoping Plan*, p. 75.

Also, in order to capture the full effects of induced travel resulting from roadway capacity projects, an RTP/SCS would need to include an assessment of land use effects of those projects, and the effects of those land uses on VMT. (See section titled “*Estimating VMT Impacts from Transportation Projects*” below.) RTP/SCSs typically model VMT using a collaboratively-developed land use “vision” for the region’s land use, rather than studying the effects on land use of the proposed transportation investments.

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.

1. Screening Thresholds for Land Use Projects

Many agencies use “screening thresholds” to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. (See e.g., CEQA Guidelines, §§ 15063(c)(3)(C), 15128, and Appendix G.) As explained below, this technical advisory suggests that lead agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing.

Screening Threshold for Small Projects

Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day¹⁹ generally may be assumed to cause a less-than-significant transportation impact.

Map-Based Screening for Residential and Office Projects

Residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Maps created with VMT data, for example from a travel survey or a travel demand model, can illustrate areas that are

¹⁹ CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

currently below threshold VMT (see recommendations below). Because new development in such locations would likely result in a similar level of VMT, such maps can be used to screen out residential and office projects from needing to prepare a detailed VMT analysis.

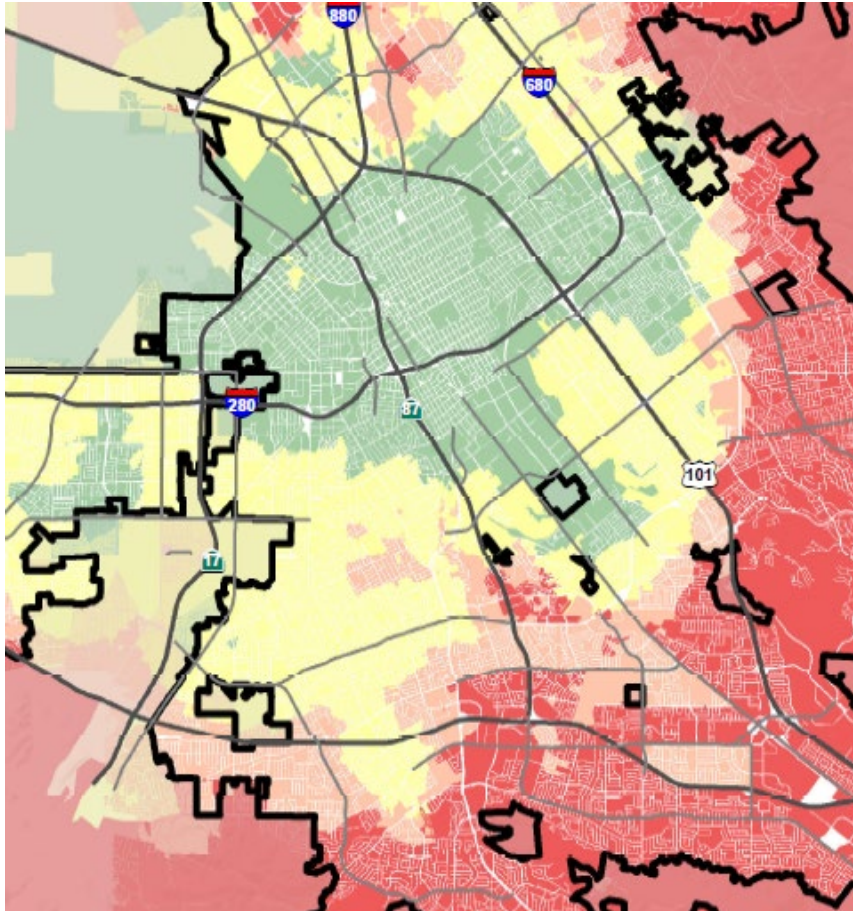


Figure 2. Example map of household VMT that could be used to delineate areas eligible to receive streamlining for VMT analysis. (Source: City of San José, Department of Transportation, draft output of City Transportation Model.)

Presumption of Less Than Significant Impact Near Transit Stations

Proposed CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop²⁰ or an existing stop

²⁰ Pub. Resources Code, § 21064.3 (“‘Major transit stop’ means 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.”).

along a high quality transit corridor²¹ will have a less-than-significant impact on VMT. This presumption would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT. For example, the presumption might not be appropriate if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking)
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization)
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units

A project or plan near transit which replaces affordable residential units²² with a smaller number of moderate- or high-income residential units may increase overall VMT because the increase in VMT of displaced residents could overwhelm the improvements in travel efficiency enjoyed by new residents.²³

If any of these exceptions to the presumption might apply, the lead agency should conduct a detailed VMT analysis to determine whether the project would exceed VMT thresholds (see below).

Presumption of Less Than Significant Impact for Affordable Residential Development

Adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT.^{24,25} Further, "... low-wage workers in particular would be more likely to choose a residential location close to their workplace, if one is available."²⁶ In areas where existing jobs-housing match is closer to optimal, low income housing nevertheless generates less VMT than market-

²¹ Pub. Resources Code, § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.").

²² Including naturally-occurring affordable residential units.

²³ Chapple et al. (2017) *Developing a New Methodology for Analyzing Potential Displacement*, Chapter 4, pp. 159-160, available at <https://www.arb.ca.gov/research/apr/past/13-310.pdf>.

²⁴ Karner and Benner (2016) *The convergence of social equity and environmental sustainability: Jobs-housing fit and commute distance* ("[P]olicies that advance a more equitable distribution of jobs and housing by linking the affordability of locally available housing with local wage levels are likely to be associated with reduced commuting distances").

²⁵ Karner and Benner (2015) *Low-wage jobs-housing fit: identifying locations of affordable housing shortages*.

²⁶ Karner and Benner (2015) *Low-wage jobs-housing fit: identifying locations of affordable housing shortages*.

rate housing.^{27,28} Therefore, a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT. Evidence supports a presumption of less than significant impact for a 100 percent affordable residential development (or the residential component of a mixed-use development) in infill locations. Lead agencies may develop their own presumption of less than significant impact for residential projects (or residential portions of mixed use projects) containing a particular amount of affordable housing, based on local circumstances and evidence. Furthermore, a project which includes any affordable residential units may factor the effect of the affordability on VMT into the assessment of VMT generated by those units.

2. Recommended Numeric Thresholds for Residential, Office, and Retail Projects

Recommended threshold for residential projects: A proposed project exceeding a level of 15 percent below existing VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita. Proposed development referencing a threshold based on city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the number of units specified in the SCS for that city, and should be consistent with the SCS.

Residential development that would generate vehicle travel that is 15 or more percent below the existing residential VMT per capita, measured against the region or city, may indicate a less-than-significant transportation impact. In MPO areas, development measured against city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the population or number of units specified in the SCS for that city because greater-than-planned amounts of development in areas above the region-based threshold would undermine the VMT containment needed to achieve regional targets under SB 375.

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. In MPO areas, development in unincorporated areas measured against aggregate city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the population or number of units specified in the SCS for that city because greater-than-planned amounts of development in areas above the regional threshold would undermine achievement of regional targets under SB 375.

²⁷ Chapple et al. (2017) *Developing a New Methodology for Analyzing Potential Displacement*, available at <https://www.arb.ca.gov/research/apr/past/13-310.pdf>.

²⁸ CAPCOA (2010) *Quantifying Greenhouse Gas Mitigation Measures*, pp. 176-178, available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

These thresholds can be applied to either household (i.e., tour-based) VMT or home-based (i.e., trip-based) VMT assessments.²⁹ It is critical, however, that the agency be consistent in its VMT measurement approach throughout the analysis to maintain an “apples-to-apples” comparison. For example, if the agency uses a home-based VMT for the threshold, it should also be use home-based VMT for calculating project VMT and VMT reduction due to mitigation measures.

Recommended threshold for office projects: A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.

Office projects that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact. 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 the county, that includes the area over which nearly all workers would be expected to live.

Office VMT screening maps can be developed using tour-based data, considering either total employee VMT or employee work tour VMT. Similarly, tour-based analysis of office project VMT could consider either total employee VMT or employee work tour VMT. Where tour-based information is unavailable for threshold determination, project assessment, or assessment of mitigation, home-based work trip VMT should be used throughout all steps of the analysis to maintain an “apples-to-apples” comparison.

Recommended threshold for retail projects: A net increase in total VMT may indicate a significant transportation impact.

Because new retail development typically redistributes shopping trips rather than creating new trips,³⁰ estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts.

By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.

Many cities and counties define local-serving and regional-serving retail in their zoning codes. Lead agencies may refer to those local definitions when available, but should also consider any project-

²⁹ See Appendix 1 for a description of these approaches.

³⁰ Lovejoy, et al. (2013) *Measuring the impacts of local land-use policies on vehicle miles of travel: The case of the first big-box store in Davis, California*, *The Journal of Transport and Land Use*.

specific information, such as market studies or economic impacts analyses that might bear on customers' travel behavior. Because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a project will likely be local-serving. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.

Mixed-Use Projects

Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential and retail). Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, a project should take credit for internal capture. Combining different land uses and applying one threshold to those land uses may result in an inaccurate impact assessment.

Other Project Types

Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends the quantified thresholds described above for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types. In developing thresholds for other project types, or thresholds different from those recommended here, lead agencies should consider the purposes described in section 21099 of the Public Resources Code and regulations in the CEQA Guidelines on the development of thresholds of significance (e.g., CEQA Guidelines, § 15064.7).

Strategies and projects that decrease local VMT but increase total VMT should be avoided. Agencies should consider whether their actions encourage development in a less travel-efficient location by limiting development in travel-efficient locations.

Redevelopment Projects

Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply.

As described above, a project or plan near transit which replaces affordable³¹ residential units with a smaller number of moderate- or high-income residential units may increase overall VMT, because

³¹ Including naturally-occurring affordable residential units.

displaced residents' VMT may increase.³² A lead agency should analyze VMT for such a project even if it otherwise would have been presumed less than significant. The assessment should incorporate an estimate of the aggregate VMT increase experienced by displaced residents. That additional VMT should be included in the numerator of the VMT per capita assessed for the project.

If a residential or office project leads to a net increase in VMT, then the project's VMT per capita (residential) or per employee (office) should be compared to thresholds recommended above. Per capita and per employee VMT are efficiency metrics, and, as such, apply only to the existing project without regard to the VMT generated by the previously existing land use.

If the project leads to a net increase in provision of locally-serving retail, transportation impacts from the retail portion of the development should be presumed to be less than significant. If the project consists of regionally-serving retail, and increases overall VMT compared to with existing uses, then the project would lead to a significant transportation impact.

RTP/SCS Consistency (All Land Use Projects)

Section 15125, subdivision (d), of the CEQA Guidelines provides that lead agencies should analyze impacts resulting from inconsistencies with regional plans, including regional transportation plans. For this reason, if a project is inconsistent with the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), the lead agency should evaluate whether that inconsistency indicates a significant impact on transportation. For example, a development may be inconsistent with an RTP/SCS if the development is outside the footprint of development or within an area specified as open space as shown in the SCS.

3. Recommendations Regarding Land Use Plans

As with projects, agencies should analyze VMT outcomes of land use plans across the full area over which the plan may substantively affect travel patterns, including beyond the boundary of the plan or jurisdiction's geography. And as with projects, VMT should be counted in full rather than split between origin and destination. (Emissions inventories have sometimes split cross-boundary trips in order to sum to a regional total, but CEQA requires accounting for the full impact without truncation or discounting). Analysis of specific plans may employ the same thresholds described above for projects. A general plan, area plan, or community plan may have a significant impact on transportation if proposed new residential, office, or retail land uses would in aggregate exceed the respective thresholds recommended above. Where the lead agency tiers from a general plan EIR pursuant to CEQA Guidelines sections 15152 and 15166, the lead agency generally focuses on the environmental impacts that are specific to the later project and were not analyzed as significant impacts in the prior EIR. (Pub. Resources Code, § 21068.5; Guidelines, § 15152, subd. (a).) Thus, in analyzing the later project, the lead agency

³² Chapple et al. (2017) *Developing a New Methodology for Analyzing Potential Displacement*, Chapter 4, pp. 159-160, available at <https://www.arb.ca.gov/research/apr/past/13-310.pdf>.

would focus on the VMT impacts that were not adequately addressed in the prior EIR. In the tiered document, the lead agency should continue to apply the thresholds recommended above.

Thresholds for plans in non-MPO areas may be determined on a case-by-case basis.

4. Other Considerations

Rural Projects Outside of MPOs

In rural areas of non-MPO counties (i.e., areas not near established or incorporated cities or towns), fewer options may be available for reducing VMT, and significance thresholds may be best determined on a case-by-case basis. Note, however, that clustered small towns and small town main streets may have substantial VMT benefits compared to isolated rural development, similar to the transit oriented development described above.

Impacts to Transit

Because criteria for determining the significance of transportation impacts must promote “the development of multimodal transportation networks” pursuant to Public Resources Code section 21099, subd. (b)(1), lead agencies should consider project impacts to transit systems and bicycle and pedestrian networks. For example, a project that blocks access to a transit stop or blocks a transit route itself may interfere with transit functions. Lead agencies should consult with transit agencies as early as possible in the development process, particularly for projects that are located within one half mile of transit stops.

When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new transit users as an adverse impact. An infill development may add riders to transit systems and the additional boarding and alighting may slow transit vehicles, but it also adds destinations, improving proximity and accessibility. Such development also improves regional vehicle flow by adding less vehicle travel onto the regional network.

Increased demand throughout a region may, however, cause a cumulative impact by requiring new or additional transit infrastructure. Such impacts may be adequately addressed through a fee program that fairly allocates the cost of improvements not just to projects that happen to locate near transit, but rather across a region to all projects that impose burdens on the entire transportation system, since transit can broadly improve the function of the transportation system.

F. Considering the Effects of Transportation Projects on Vehicle Travel

Many transportation projects change travel patterns. A transportation project which leads to additional vehicle travel on the roadway network, commonly referred to as “induced vehicle travel,” would need to quantify the amount of additional vehicle travel in order to assess air quality impacts, greenhouse gas emissions impacts, energy impacts, and noise impacts. Transportation projects also are required to

examine induced growth impacts under CEQA. (See generally, Pub. Resources Code, §§ 21065 [defining “project” under CEQA as an activity as causing either a direct or reasonably foreseeable indirect physical change], 21065.3 [defining “project-specific effect” to mean all direct or indirect environmental effects], 21100, subd. (b) [required contents of an EIR].) For any project that increases vehicle travel, explicit assessment and quantitative reporting of the amount of additional vehicle travel should not be omitted from the document; such information may be useful and necessary for a full understanding of a project’s environmental impacts. (See Pub. Resources Code, §§ 21000, 21001, 21001.1, 21002, 21002.1 [discussing the policies of CEQA].) A lead agency that uses the VMT metric to assess the transportation impacts of a transportation project may simply report that change in VMT as the impact. When the lead agency uses another metric to analyze the transportation impacts of a roadway project, changes in amount of vehicle travel added to the roadway network should still be analyzed and reported.³³

While CEQA does not require perfection, it is important to make a reasonably accurate estimate of transportation projects’ effects on vehicle travel in order to make reasonably accurate estimates of GHG emissions, air quality emissions, energy impacts, and noise impacts. (See, e.g., *California Clean Energy Com. v. City of Woodland* (2014) 225 Cal.App.4th 173, 210 [EIR failed to consider project’s transportation energy impacts]; *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 266.) Appendix 2 describes in detail the causes of induced vehicle travel, the robust empirical evidence of induced vehicle travel, and how models and research can be used in conjunction to quantitatively assess induced vehicle travel with reasonable accuracy.

If a project would likely lead to a measurable and substantial increase in vehicle travel, the lead agency should conduct an analysis assessing the amount of vehicle travel the project will induce. Project types that would likely lead to a measurable and substantial increase in vehicle travel generally include:

- Addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, or lanes through grade-separated interchanges

Projects that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis, include:

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity
- Roadside safety devices or hardware installation such as median barriers and guardrails

³³ See, e.g., California Department of Transportation (2006) *Guidance for Preparers of Growth-related, Indirect Impact Analyses*, available at http://www.dot.ca.gov/ser/Growth-related_IndirectImpactAnalysis/GRI_guidance06May_files/gri_guidance.pdf.

- Roadway shoulder enhancements to provide “breakdown space,” dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes
- Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not utilized as through lanes
- Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
- Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel
- Addition of a new lane that is permanently restricted to use only by transit vehicles
- Reduction in number of through lanes
- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles
- Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
- Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
- Timing of signals to optimize vehicle, bicycle, or pedestrian flow
- Installation of roundabouts or traffic circles
- Installation or reconfiguration of traffic calming devices
- Adoption of or increase in tolls
- Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase
- Initiation of new transit service
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
- Removal or relocation of off-street or on-street parking spaces
- Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
- Addition of traffic wayfinding signage
- Rehabilitation and maintenance projects that do not add motor vehicle capacity
- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel
- Installation of publicly available alternative fuel/charging infrastructure
- Addition of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor

1. Recommended Significance Threshold for Transportation Projects

As noted in Section 15064.3 of the CEQA Guidelines, lead agencies for roadway capacity projects have discretion, consistent with CEQA and planning requirements, to choose which metric to use to evaluate transportation impacts. This section recommends considerations for evaluating impacts using vehicle miles traveled. Lead agencies have discretion to choose a threshold of significance for transportation projects as they do for other types of projects. As explained above, Public Resources Code section 21099, subdivision (b)(1), provides that criteria for determining the significance of transportation impacts must promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. (*Id.*; see generally, adopted CEQA Guidelines, § 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) With those goals in mind, OPR prepared and the Agency adopted an appropriate transportation metric.

Whether adopting a threshold of significance, or evaluating transportation impacts on a case-by-case basis, a lead agency should ensure that the analysis addresses:

- Direct, indirect and cumulative effects of the transportation project (CEQA Guidelines, § 15064, subds. (d), (h))
- Near-term and long-term effects of the transportation project (CEQA Guidelines, §§ 15063, subd. (a)(1), 15126.2, subd. (a))
- The transportation project's consistency with state greenhouse gas reduction goals (Pub. Resources Code, § 21099)³⁴
- The impact of the transportation project on the development of multimodal transportation networks (Pub. Resources Code, § 21099)
- The impact of the transportation project on the development of a diversity of land uses (Pub. Resources Code, § 21099)

The CARB Scoping Plan and the CARB Mobile Source Strategy delineate VMT levels required to achieve legally mandated GHG emissions reduction targets. A lead agency should develop a project-level threshold based on those VMT levels, and may apply the following approach:

1. Propose a fair-share allocation of those budgets to their jurisdiction (e.g., by population);

³⁴ The California Air Resources Board has ascertained the limits of VMT growth compatible with California containing greenhouse gas emissions to levels research shows would allow for climate stabilization. (See [The 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target](#) (p. 78, p. 101); [Mobile Source Strategy](#) (p. 37).) CARB's [Updated Final Staff Report on Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets](#) illustrates that the current Regional Transportation Plans and Sustainable Communities Strategies will fall short of achieving the necessary on-road transportation-related GHG emissions reductions called for in the 2017 Scoping Plan (Figure 3, p. 35). Accordingly, OPR recommends not basing GHG emissions or transportation impact analysis for a transportation project solely on consistency with an RTP/SCS.

2. Determine the amount of VMT growth likely to result from background population growth, and subtract that from their “budget”;
3. Allocate their jurisdiction’s share between their various VMT-increasing transportation projects, using whatever criteria the lead agency prefers.

2. Estimating VMT Impacts from Transportation Projects

CEQA requires analysis of a project’s potential growth-inducing impacts. (Pub. Resources Code, § 21100, subd. (b)(5); CEQA Guidelines, § 15126.2, subd. (d).) Many agencies are familiar with the analysis of growth inducing impacts associated with water, sewer, and other infrastructure. This technical advisory addresses growth that may be expected from roadway expansion projects.

Because a roadway expansion project can induce substantial VMT, incorporating quantitative estimates of induced VMT is critical to calculating both transportation and other impacts of these projects. Induced travel also has the potential to reduce or eliminate congestion relief benefits. An accurate estimate of induced travel is needed to accurately weigh costs and benefits of a highway capacity expansion project.

The effect of a transportation project on vehicle travel should be estimated using the “change in total VMT” method described in *Appendix 1*. This means that an assessment of total VMT without the project and an assessment with the project should be made; the difference between the two is the amount of VMT attributable to the project. The assessment should cover the full area in which driving patterns are expected to change. As with other types of projects, the VMT estimation should not be truncated at a modeling or jurisdictional boundary for convenience of analysis when travel behavior is substantially affected beyond that boundary.

Transit and Active Transportation Projects

Transit and active transportation projects generally reduce VMT and therefore are presumed to cause a less-than-significant impact on transportation. This presumption may apply to all passenger rail projects, bus and bus rapid transit projects, and bicycle and pedestrian infrastructure projects. Streamlining transit and active transportation projects aligns with each of the three statutory goals contained in SB 743 by reducing GHG emissions, increasing multimodal transportation networks, and facilitating mixed use development.

Roadway Projects

Reducing roadway capacity (for example, by removing or repurposing motor vehicle travel lanes) will generally reduce VMT and therefore is presumed to cause a less-than-significant impact on transportation. Generally, no transportation analysis is needed for such projects.

Building new roadways, adding roadway capacity in congested areas, or adding roadway capacity to areas where congestion is expected in the future, typically induces additional vehicle travel. For the types of projects previously indicated as likely to lead to additional vehicle travel, an estimate should be made of the change in vehicle travel resulting from the project.

For projects that increase roadway capacity, lead agencies can evaluate induced travel quantitatively by applying the results of existing studies that examine the magnitude of the increase of VMT resulting from a given increase in lane miles. These studies estimate the percent change in VMT for every percent change in miles to the roadway system (i.e., “elasticity”).³⁵ Given that lead agencies have discretion in choosing their methodology, and the studies on induced travel reveal a range of elasticities, lead agencies may appropriately apply professional judgment in studying the transportation effects of a particular project. The most recent major study, estimates an elasticity of 1.0, meaning that every percent change in lane miles results in a one percent increase in VMT.³⁶

To estimate VMT impacts from roadway expansion projects:

1. Determine the total lane-miles over an area that fully captures travel behavior changes resulting from the project (generally the region, but for projects affecting interregional travel look at all affected regions).
2. Determine the percent change in total lane miles that will result from the project.
3. Determine the total existing VMT over that same area.
4. Multiply the percent increase in lane miles by the existing VMT, and then multiply that by the elasticity from the induced travel literature:

$$[\% \text{ increase in lane miles}] \times [\text{existing VMT}] \times [\text{elasticity}] = [\text{VMT resulting from the project}]$$

A National Center for Sustainable Transportation tool can be used to apply this method:

<https://ncst.ucdavis.edu/research/tools>

This method would not be suitable for rural (non-MPO) locations in the state which are neither congested nor projected to become congested. It also may not be suitable for a new road that provides new connectivity across a barrier (e.g., a bridge across a river) if it would be expected to substantially

³⁵ See U.C. Davis, Institute for Transportation Studies (Oct. 2015) *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion*; Boarnet and Handy (Sept. 2014) *Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions*, California Air Resources Board Policy Brief, available at https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf.

³⁶ See Duranton and Turner (2011) *The Fundamental Law of Road Congestion: Evidence from US cities*, available at <http://www.nber.org/papers/w15376>.

shorten existing trips. If it is likely to be substantial, the trips-shortening effect should be examined explicitly.

The effects of roadway capacity on vehicle travel can also be applied at a programmatic level. For example, in a regional planning process the lead agency can use that program-level analysis to streamline later project-level analysis. (See CEQA Guidelines, § 15168.) A program-level analysis of VMT should include effects of the program on land use patterns, and the VMT that results from those land use effects. In order for a program-level document to adequately analyze potential induced demand from a project or program of roadway capacity expansion, lead agencies cannot assume a fixed land use pattern (i.e., a land use pattern that does not vary in response to the provision of roadway capacity). A proper analysis should account for land use investment and development pattern changes that react in a reasonable manner to changes in accessibility created by transportation infrastructure investments (whether at the project or program level).

Mitigation and Alternatives

Induced VMT has the potential to reduce or eliminate congestion relief benefits, increase VMT, and increase other environmental impacts that result from vehicle travel.³⁷ If those effects are significant, the lead agency will need to consider mitigation or alternatives. In the context of increased travel that is induced by capacity increases, appropriate mitigation and alternatives that a lead agency might consider include the following:

- Tolling new lanes to encourage carpools and fund transit improvements
- Converting existing general purpose lanes to HOV or HOT lanes
- Implementing or funding off-site travel demand management
- Implementing Intelligent Transportation Systems (ITS) strategies to improve passenger throughput on existing lanes

Tolling and other management strategies can have the additional benefit of preventing congestion and maintaining free-flow conditions, conferring substantial benefits to road users as discussed above.

G. Analyzing Other Impacts Related to Transportation

While requiring a change in the methodology of assessing transportation impacts, Public Resources Code section 21099 notes that this change “does not relieve a public agency of the requirement to analyze a project’s potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation.” OPR expects that lead agencies will continue to

³⁷ See National Center for Sustainable Transportation (Oct. 2015) *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion*, available at http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf; see Duranton and Turner (2011) *The Fundamental Law of Road Congestion: Evidence from US cities*, available at <http://www.nber.org/papers/w15376>.

address mobile source emissions in the air quality and noise sections of an environmental document and the corresponding studies that support the analysis in those sections. Lead agencies should continue to address environmental impacts of a proposed project pursuant to CEQA's requirements, using a format that is appropriate for their particular project.

Because safety concerns result from many different factors, they are best addressed at a programmatic level (i.e., in a general plan or regional transportation plan) in cooperation with local governments, metropolitan planning organizations, and, where the state highway system is involved, the California Department of Transportation. In most cases, such an analysis would not be appropriate on a project-by-project basis. Increases in traffic volumes at a particular location resulting from a project typically cannot be estimated with sufficient accuracy or precision to provide useful information for an analysis of safety concerns. Moreover, an array of factors affect travel demand (e.g., strength of the local economy, price of gasoline), causing substantial additional uncertainty. Appendix B of OPR's [General Plan Guidelines](#) summarizes research which could be used to guide a programmatic analysis under CEQA. Lead agencies should note that automobile congestion or delay does not constitute a significant environmental impact (Pub. Resources Code, §21099(b)(2)), and safety should not be used as a proxy for road capacity.

H. VMT Mitigation and Alternatives

When a lead agency identifies a significant impact, it must identify feasible mitigation measures that could avoid or substantially reduce that impact. (Pub. Resources Code, § 21002.1, subd. (a).) Additionally, CEQA requires that an environmental impact report identify feasible alternatives that could avoid or substantially reduce a project's significant environmental impacts.

Indeed, the California Court of Appeal recently held that a long-term regional transportation plan was deficient for failing to discuss an alternative which could significantly reduce total vehicle miles traveled. In *Cleveland National Forest Foundation v. San Diego Association of Governments, et al.* (2017) 17 Cal.App.5th 413, the court found that omission "inexplicable" given the lead agency's "acknowledgment in its Climate Action Strategy that the state's efforts to reduce greenhouse gas emissions from on-road transportation will not succeed if the amount of driving, or vehicle miles traveled, is not significantly reduced." (*Cleveland National Forest Foundation, supra*, 17 Cal.App.5th at p. 436.) Additionally, the court noted that the project alternatives focused primarily on congestion relief even though "the [regional] transportation plan is a long-term and congestion relief is not necessarily an effective long-term strategy." (*Id.* at p. 437.) The court concluded its discussion of the alternatives analysis by stating: "Given the acknowledged long-term drawbacks of congestion relief alternatives, there is not substantial evidence to support the EIR's exclusion of an alternative focused primarily on significantly reducing vehicle trips." (*Ibid.*)

Several examples of potential mitigation measures and alternatives to reduce VMT are described below. However, the selection of particular mitigation measures and alternatives are left to the discretion of

the lead agency, and mitigation measures may vary, depending on the proposed project and significant impacts, if any. Further, OPR expects that agencies will continue to innovate and find new ways to reduce vehicular travel.

Potential measures to reduce vehicle miles traveled include, but are not limited to:

- Improve or increase access to transit.
- Increase access to common goods and services, such as groceries, schools, and daycare.
- Incorporate affordable housing into the project.
- Incorporate neighborhood electric vehicle network.
- Orient the project toward transit, bicycle and pedestrian facilities.
- Improve pedestrian or bicycle networks, or transit service.
- Provide traffic calming.
- Provide bicycle parking.
- Limit or eliminate parking supply.
- Unbundle parking costs.
- Provide parking cash-out programs.
- Implement roadway pricing.
- Implement or provide access to a commute reduction program.
- Provide car-sharing, bike sharing, and ride-sharing programs.
- Provide transit passes.
- Shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services.
- Providing telework options.
- Providing incentives or subsidies that increase the use of modes other than single-occupancy vehicle.
- Providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms.
- Providing employee transportation coordinators at employment sites.
- Providing a guaranteed ride home service to users of non-auto modes.

Notably, because VMT is largely a regional impact, regional VMT-reduction programs may be an appropriate form of mitigation. In lieu fees have been found to be valid mitigation where there is both a commitment to pay fees and evidence that mitigation will actually occur. (*Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 140-141; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 727–728.) Fee programs are particularly useful to address cumulative impacts. (CEQA Guidelines, § 15130, subd. (a)(3) [a “project’s incremental contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact”].) The mitigation program must undergo CEQA evaluation, either on the program as a whole, or the in-lieu fees or other mitigation must be evaluated

on a project-specific basis. (*California Native Plant Society v. County of El Dorado* (2009) 170 Cal.App.4th 1026.) That CEQA evaluation could be part of a larger program, such as a regional transportation plan, analyzed in a Program EIR. (CEQA Guidelines, § 15168.)

Examples of project alternatives that may reduce vehicle miles traveled include, but are not limited to:

- Locate the project in an area of the region that already exhibits low VMT.
- Locate the project near transit.
- Increase project density.
- Increase the mix of uses within the project or within the project's surroundings.
- Increase connectivity and/or intersection density on the project site.
- Deploy management strategies (e.g., pricing, vehicle occupancy requirements) on roadways or roadway lanes.

Appendix 1. Considerations About Which VMT to Count

Consistent with the obligation to make a good faith effort to disclose the environmental consequences of a project, lead agencies have discretion to choose the most appropriate methodology to evaluate project impacts.³⁸ A lead agency can evaluate a project's effect on VMT in numerous ways. The purpose of this document is to provide technical considerations in determining which methodology may be most useful for various project types.

Background on Estimating Vehicle Miles Traveled

Before discussing specific methodological recommendations, this section provides a brief overview of modeling and counting VMT, including some key terminology.

Here is an illustrative example of some methods of estimating vehicle miles traveled. Consider the following hypothetical travel day (all by automobile):

1. Residence to Coffee Shop
2. Coffee Shop to Work
3. Work to Sandwich Shop
4. Sandwich Shop to Work
5. Work to Residence
6. Residence to Store
7. Store to Residence

Trip-based assessment of a project's effect on travel behavior counts VMT from individual trips to and from the project. It is the most basic, and traditionally the most common, method of counting VMT. A trip-based VMT assessment of the residence in the above example would consider segments 1, 5, 6 and 7. For residential projects, the sum of home-based trips is called *home-based* VMT.

A *tour-based* assessment counts the entire home-back-to-home tour that includes the project. A tour-based VMT assessment of the residence in the above example would consider segments 1, 2, 3, 4, and 5 in one tour, and 6 and 7 in a second tour. A tour-based assessment of the workplace would include segments 1, 2, 3, 4, and 5. Together, all tours comprise *household* VMT.

³⁸ The California Supreme Court has explained that when an agency has prepared an environmental impact report:

[T]he issue is not whether the [lead agency's] studies are irrefutable or whether they could have been better. The relevant issue is only whether the studies are sufficiently credible to be considered as part of the total evidence that supports the [lead agency's] finding[.]

(*Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 409; see also *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App.4th 357, 372.)

Both trip- and tour-based assessments can be used as measures of transportation efficiency, using denominators such as per capita, per employee, or per person-trip.

Trip- and Tour-based Assessment of VMT

As illustrated above, a tour-based assessment of VMT is a more complete characterization of a project's effect on VMT. In many cases, a project affects travel behavior beyond the first destination. The location and characteristics of the home and workplace will often be the main drivers of VMT. For example, a residential or office development located near high quality transit will likely lead to some commute trips utilizing transit, affecting mode choice on the rest of the tour.

Characteristics of an office project can also affect an employee's VMT beyond the work tour. For example, a workplace located at the urban periphery, far from transit, can require an employee to own a car, which in turn affects the entirety of an employee's travel behavior and VMT. For this reason, when estimating the effect of an office development on VMT, it may be appropriate to consider total employee VMT if data and tools, such as tour-based models, are available. This is consistent with CEQA's requirement to evaluate both direct and *indirect* effects of a project. (See CEQA Guidelines, § 15064, subd. (d)(2).)

Assessing Change in Total VMT

A third method, estimating the *change in total VMT* with and without the project, can evaluate whether a project is likely to divert existing trips, and what the effect of those diversions will be on total VMT. This method answers the question, "What is the net effect of the project on area VMT?" As an illustration, assessing the total change in VMT for a grocery store built in a food desert that diverts trips from more distant stores could reveal a net VMT reduction. The analysis should address the full area over which the project affects travel behavior, even if the effect on travel behavior crosses political boundaries.

Using Models to Estimate VMT

Travel demand models, sketch models, spreadsheet models, research, and data can all be used to calculate and estimate VMT (see Appendix F of the [preliminary discussion draft](#)). To the extent possible, lead agencies should choose models that have sensitivity to features of the project that affect VMT. Those tools and resources can also assist in establishing thresholds of significance and estimating VMT reduction attributable to mitigation measures and project alternatives. When using models and tools for those various purposes, agencies should use comparable data and methods, in order to set up an "apples-to-apples" comparison between thresholds, VMT estimates, and VMT mitigation estimates.

Models can work together. For example, agencies can use travel demand models or survey data to estimate existing trip lengths and input those into sketch models such as CalEEMod to achieve more

accurate results. Whenever possible, agencies should input localized trip lengths into a sketch model to tailor the analysis to the project location. However, in doing so, agencies should be careful to avoid double counting if the sketch model includes other inputs or toggles that are proxies for trip length (e.g., distance to city center). Generally, if an agency changes any sketch model defaults, it should record and report those changes for transparency of analysis. Again, trip length data should come from the same source as data used to calculate thresholds to be sure of an “apples-to-apples” comparison.

Additional background information regarding travel demand models is available in the California Transportation Commission’s [“2010 Regional Transportation Plan Guidelines,”](#) beginning at page 35.

Appendix 2. Induced Travel: Mechanisms, Research, and Additional Assessment Approaches

Induced travel occurs where roadway capacity is expanded in an area of present or projected future congestion. The effect typically manifests over several years. Lower travel times make the modified facility more attractive to travelers, resulting in the following trip-making changes:

- **Longer trips.** The ability to travel a long distance in a shorter time increases the attractiveness of destinations that are farther away, increasing trip length and vehicle travel.
- **Changes in mode choice.** When transportation investments are devoted to reducing automobile travel time, travelers tend to shift toward automobile use from other modes, which increases vehicle travel.
- **Route changes.** Faster travel times on a route attract more drivers to that route from other routes, which can increase or decrease vehicle travel depending on whether it shortens or lengthens trips.
- **Newly generated trips.** Increasing travel speeds can induce additional trips, which increases vehicle travel. For example, an individual who previously telecommuted or purchased goods on the internet might choose to accomplish those tasks via automobile trips as a result of increased speeds.
- **Land Use Changes.** Faster travel times along a corridor lead to land development farther along that corridor; that new development generates and attracts longer trips, which increases vehicle travel. Over several years, this induced growth component of induced vehicle travel can be substantial, making it critical to include in analyses.

Each of these effects has implications for the total amount of vehicle travel. These effects operate over different time scales. For example, changes in mode choice might occur immediately, while land use changes typically take a few years or longer. CEQA requires lead agencies to analyze both short-term and long-term effects.

Evidence of Induced Vehicle Travel. A large number of peer reviewed studies³⁹ have demonstrated a causal link between highway capacity increases and VMT increases. Many provide quantitative estimates of the magnitude of the induced VMT phenomenon. Collectively, they provide high quality evidence of the existence and magnitude of the induced travel effect.

³⁹ See, e.g., Boarnet and Handy (Sept. 2014) Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions, California Air Resources Board Policy Brief, available at https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf; National Center for Sustainable Transportation (Oct. 2015) *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion*, available at http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf.

Most of these studies express the amount of induced vehicle travel as an “elasticity,” which is a multiplier that describes the additional vehicle travel resulting from an additional lane mile of roadway capacity added. For example, an elasticity of 0.6 would signify an 0.6 percent increase in vehicle travel for every 1.0 percent increase in lane miles. Many of these studies distinguish “short run elasticity” (increase in vehicle travel in the first few years) from “long run elasticity” (increase in vehicle travel beyond the first few years). Long run elasticity is larger than short run elasticity, because as time passes, more of the components of induced vehicle travel materialize. Generally, short run elasticity can be thought of as excluding the effects of land use change, while long run elasticity includes them. Most studies find a long run elasticity between 0.6 and just over 1.0,⁴⁰ meaning that every increase in lanes miles of one percent leads to an increase in vehicle travel of 0.6 to 1.0 percent. The most recent major study finds the elasticity of vehicle travel by lanes miles added to be 1.03; in other words, each percent increase in lane miles results in a 1.03 percent increase in vehicle travel.⁴¹ (An elasticity greater than 1.0 can occur because new lanes induce vehicle travel that spills beyond the project location.) In CEQA analysis, the long-run elasticity should be used, as it captures the full effect of the project rather than just the early-stage effect.

Quantifying Induced Vehicle Travel Using Models. Lead agencies can generally achieve the most accurate assessment of induced vehicle travel resulting from roadway capacity increasing projects by applying elasticities from the academic literature, because those estimates include vehicle travel resulting from induced land use. If a lead agency chooses to use a travel demand model, additional analysis would be needed to account for induced land use. This section describes some approaches to undertaking that additional analysis.

Proper use of a travel demand model can capture the following components of induced VMT:

- Trip length (generally increases VMT)
- Mode shift (generally shifts from other modes toward automobile use, increasing VMT)
- Route changes (can act to increase or decrease VMT)
- Newly generated trips (generally increases VMT)
 - Note that not all travel demand models have sensitivity to this factor, so an off-model estimate may be necessary if this effect could be substantial.

However, estimating long-run induced VMT also requires an estimate of the project’s effects on land use. This component of the analysis is important because it has the potential to be a large component of

⁴⁰ See Boarnet and Handy (Sept. 2014) [Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions](https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf), California Air Resources Board Policy Brief, p. 2, available at https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf.

⁴¹ Duranton and Turner (2011) *The Fundamental Law of Road Congestion: Evidence from US cities*, available at <http://www.nber.org/papers/w15376>.

the overall induced travel effect. Options for estimating and incorporating the VMT effects that are caused by the subsequent land use changes include:

1. *Employ an expert panel.* An expert panel could assess changes to land use development that would likely result from the project. This assessment could then be analyzed by the travel demand model to assess effects on vehicle travel. Induced vehicle travel assessed via this approach should be verified using elasticities found in the academic literature.
2. *Adjust model results to align with the empirical research.* If the travel demand model analysis is performed without incorporating projected land use changes resulting from the project, the assessed vehicle travel should be adjusted upward to account for those land use changes. The assessed VMT after adjustment should fall within the range found in the academic literature.
3. *Employ a land use model, running it iteratively with a travel demand model.* A land use model can be used to estimate the land use effects of a roadway capacity increase, and the traffic patterns that result from the land use change can then be fed back into the travel demand model. The land use model and travel demand model can be iterated to produce an accurate result.

A project which provides new connectivity across a barrier, such as a new bridge across a river, may provide a shortened path between existing origins and destinations, thereby shortening existing trips. In rare cases, this trip-shortening effect might be substantial enough to reduce the amount of vehicle travel resulting from the project below the range found in the elasticities in the academic literature, or even lead a net reduction in vehicle travel overall. In such cases, the trip-shortening effect could be examined explicitly.

Whenever employing a travel demand model to assess induced vehicle travel, any limitation or known lack of sensitivity in the analysis that might cause substantial errors in the VMT estimate (for example, model insensitivity to one of the components of induced VMT described above) should be disclosed and characterized, and a description should be provided on how it could influence the analysis results. A discussion of the potential error or bias should be carried into analyses that rely on the VMT analysis, such as greenhouse gas emissions, air quality, energy, and noise.

From: [Jacob Patterson](#)
To: [Peters, Sarah](#); [O'Neal, Chantell](#); [Miller, Tabatha](#); [CDD User](#)
Subject: Public Comment Re: Modified Agenda 5/26/2021 for city.fortbragg.com
Date: Wednesday, May 26, 2021 5:21:13 PM

Despite the City's apparent negligence in not properly uploading public comments this afternoon by uploading a jumbled mess of repeat comments that increased the file from 27 pages to 977 pages, somehow the City failed to include all timely submitted comments! This is absolutely ridiculous and should not be tolerated by the Planning Commission or anyone, for that matter. Because no one could actually read that many pages of additional comments, this item must be continued to a future meeting and the public comments need to be corrected, including adding in the comments that are still missing despite other comments appearing multiple times. This is either a bizarre attempt by staff to try to confuse the public and the Commission or some sort of technical problem. Either way, it needs to be fixed and the underlying problems must be addressed.

On Wed, May 26, 2021 at 4:04 PM Planning Commission Agendas <listserv@civicplus.com> wrote:

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Attachment 2 to Item 6A has been updated. Public comments have been added to Item 6A.

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From: [Jacob Patterson](#)
To: [O'Neal, Chantell](#)
Subject: Re: Uploaded public comments for proposed Grocery Outlet project
Date: Wednesday, May 26, 2021 9:57:55 AM

That is not accurate based on my review of the uploaded comments, or at least not how uploading the comments was implemented even if that was the intent. For example, if you read the subject lines of the email messages that were uploaded as public comments, many of them do not explicitly state that they are public comments but they were still uploaded as public comments. However, this was not uniformly applied, which is critical for these types of things. The procedural aspects of entitlement reviews are all about 100% attention to detail and that was the major problem with Joanna, her work was sloppy and she did not adhere to consistent practices. That approach taints the process and it appears to have been applied to this review as well, although to a lesser degree than the substance of the work is lacking. Anyway, other substantively similar email comments about this project that were received by the City were not uploaded, including several comments from me that were clearly of the same nature of what was included. Regarding the CEQA comments, there are also missing comments from that section; I am aware of at least one substantive email comment from Annemarie that was submitted prior to February 16th and was not included in the CEQA comments. (Note that I viewed the CEQA comments as only being comments received during the official draft IS/MND public review and comment period that ended on February 16th even though the City obviously received additional comments concerning the inadequacy of the CEQA review after that official period. Frankly, I am increasingly concerned about the lack of effectiveness of the internal review processes in not weeding out these repeated problems and deficient work coming from your subordinate staff and the consultants.

On Wed, May 26, 2021 at 6:47 AM O'Neal, Chantell <COneal@fortbragg.com> wrote:

Mr. Patterson,

All comments identified as such and received to my knowledge were saved and uploaded with the first agenda publication under either CEQA comments or Public comments.

Please feel free to provide anything you feel was missed and we will include it in today's 3pm republication.

Thanks,
Chantell

On May 21, 2021 2:36 PM, Jacob Patterson <jacob.patterson.esq@gmail.com> wrote:
Chantell or Sarah,

I read through the public comments the City posted for the Grocery Outlet project and numerous comments haven't been included. I sent in a variety of emails, including attached photos and other documentary evidence to support other written comments and many of them have not been posted. As you are probably aware, the administrative record for a project includes all substantive correspondence and all of that information is supposed to be included in a project review. While not all correspondence has to be considered a public comment, anything brought up in any of the correspondence is relevant and can be relied upon at later stages of a project review. Since the City uploaded numerous items of correspondence that were not labelled as official public comments, why have some of these

comments been omitted. A couple examples are emails I sent in with photos showing the ocean views through the site that will be blocked because the building is shifting to the north relative to the current building (contrary to false assertions in the staff report otherwise), other emails with photos documenting protected birds foraging and using shelter on the site, and analysis from the City's water model showing a lack of adequate water supply. These emails should be included since the City included other similar correspondence. The City certainly isn't permitted to cherry pick only some relevant correspondence to provide to the Planning Commission and then omit others. Please remedy this situation ASAP or the hearing will likely have to be continued.

Thanks,

--Jacob

Email correspondence with the City of Fort Bragg (and attachments, if any) may be subject to the California Public Records Act, and as such may therefore be subject to public disclosure unless otherwise exempt under the Act.

From: noreply@civicplus.com
To: [CDD User; Jones, Marie](#)
Subject: Online Form Submittal: Contact Us (Dropdown)
Date: Saturday, May 22, 2021 11:01:03 PM

Contact Us (Dropdown)

First Name	Marilla
Last Name	Peeler
Address1	23575 N. Hwy. 1
Address2	<i>Field not completed.</i>
City	Fort Bragg
State	Ca
Zip	95437
Phone Number	7078130341
Email Address	rillatoo.com

(Section Break)

Whom would you like to contact?	Community Development
Question / Comment	I believe the grocery outlet should be approved for Fort Bragg. I also believe the location of the old social services building would be ideal. The building is going to rack and ruined by just sitting empty because no one wants anything to be inside that building. It has a decent parking lot and on street parking as well.

Email not displaying correctly? [View it in your browser.](#)

VOICE YOUR OPINION

I would like to see a Grocery Outlet go in on S. Franklin and Harbor in Fort Bragg.
Why? Jobs. More affordable shopping options. Upgrade the building currently at that corner.

Please let the Fort Bragg Planning Commission, City Council and staff know by signing here:

Please Print:

Name - First/Last:

Phone:

Email:

V Beddie

707 357 5075

Ubonistybluel@gmail.com

J. Pacey

707 513-7492

N/A

Destiny Duncan

707 616 9323

desduncan89@gmail.com

JOSE CASTELLANOS

707-961-1857

Allen Riley

530-790-0852

Charles Maly

530-717-9174

youngblance@comcast.net

Michael Rinsley

707 357-6285

~~spite~~

Phillip Hodson

707 354 0631

phs93@gmail.com

Ann Ward

707 813 4305

fbwachteleg@gmail.com

Helen Bassler

n/A

Christine Clark

895-3192

Paul A

(707) 357 6128

Janis B. Bagor

Dennis P McNeil

916 724-3780

JOAN MOON

707-357-7637

Candy Wynn

707 964 0157

Shelley Jones

707 357-1609

PLEASE YOUR OWN

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Jul 9/6-300-8680

WHEN FILTER OUT

CALL

707-962-734

VOICE YOUR OPINION

I would like to see a Grocery Outlet go in on S. Franklin and Harbor in Fort Bragg.
Why? Jobs. More affordable shopping options. Upgrade the building currently at that corner.

Please let the Fort Bragg Planning Commission, City Council and staff know by signing here:

Please Print:

Name - First/Last:

Phone:

Email:

<u>Alan</u>		
<u>Karen</u>	<u>(707) 437 0382</u>	
<u>Dale Syler</u>	<u>(707) 962-7623</u>	
<u>BART SWOREG</u>	<u>707 961 0601</u>	
<u>Bio d'karki</u>	<u>925 439 -6922</u>	
<u>Cam Rean</u>	<u>202-489-1136</u>	
<u>Xavier Purley</u>	<u>919 360 1546</u>	
<u>Alvin J. Hall</u>	<u>707-472-7442</u>	
<u>Theresa Quaschnick</u>	<u>707 813 4731</u>	
<u>Teo Acosta</u>	<u>707 486 4453</u>	
<u>[Signature]</u>	<u>7-7 357 8125</u>	
<u>Bethany J. [Signature]</u>	<u>707 357 7838</u>	
<u>Dawn Ferreira</u>	<u>707.962.9492</u>	
<u>Tim Powell</u>	<u>707-962-9492</u>	
<u>Walker Ferreira</u>	<u>707-962 9492</u>	
<u>Garth Ogle</u>	<u>707 813-3444</u>	
<u>Sarah Custer</u>	<u>(707) 813-4555</u>	

VOICE YOUR OPINION

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Please let the Fort Bragg Planning Commission, City Council and staff know by signing here:

Please Print:

Name - First/Last:

Phone:

Email:

JAMES BRIDGEMAN 707-965-0450 ~

Earl Oliver 707-962-6176

Wayne Walker 530-632-6196

Richard [unclear] 908-692-0960

~~Richard [unclear]~~ 707-472-7461

Donald Speer (707) 962-0597 no email

Luke Wagner 805-705-1971

Shelbie Liljeberg (707) 357-1359

Aviel Santos (707) 357-8071

Willow Hubbard 828 989 1691

Paul [unclear] 734-0812

Ziff 530. 781. 3679

Jim [unclear] 530 513 4423

Flori [unclear] 707-813 0585

Barb Bruce 707 964 8080

Janet [unclear] 707-937-4309

Juan Rodriguez 707 357 2351

VOICE YOUR OPINION

Would like to see a Greater Orléans so in one's hands...
...ing currently at the...
...ing Commission... staff...

Please Print

[Faint, illegible handwriting on lined paper]

Joe 916-300-8680

When filled out call

707 - 962 - 7341

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I would like to see a Grocery Outlet go in on S. Franklin and Harbor in Fort Bragg.
Why? Jobs. More affordable shopping options. Upgrade the building currently at that corner.

Please let the Fort Bragg Planning Commission, City Council and staff know by signing here:

Please Print:

Name - First/Last:

Phone:

Email:

Baylee Delcampo 707 734 0843 bayleepaige12@gmail.com

MARY ANN CARROLL 707 813 7147 NA

Kathie Decker 707 281-967-0943

Jacqui Sipila (707) 357-8216

Wayne Sipila (707) 813-0438

Bev Sipila (707) 813-0544

Barbara 707-964-2254

Jay May 707 757 0094

Craig AREVERE 707-964-9581

TOM FOX 707 367-5289

Marcand Villalobos 707-548-6646

Jeremy Seadorf 916 755-8007

EMERSON S 707 813-1411 EmersonShattuck18

Veronica Fox 707-813-1408

[Signature]

Jennifer [Signature] 707 357 4361

Ashley Vance 707 962 7891 cheyenneandmelanie@gmail.com

VOICE YOUR OPINION

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Why? Jobs. More affordable shopping options. Upgrade the building currently at that corner.

Please let the Fort Bragg Planning Commission, City Council and staff know by signing here:

Please Print:

Name - First/Last:	Phone:	Email:
JASON Mills	707-357-3017	JASON M. 1/5 2130 @
Traay Shurman	707-294-5100	Traay Shurman 841 at gmail.com
JIM JEFFRIES	N/A	N/A
Karen May	7078130777	Lizzie_2502@hobutlock.com
Linda Stanton	707-813-0535	LStanton@Comcast
Brian Urban	711-734-3501	Sweetroll76@gmail.com
James Kyve		
M. Rume	408392-8957	
Sara Andrews	707-962-7166	sarahlynn26@gmail.com
E. Velazquez	707 344-3431	
Alison	707-357-662	alisonluna@gmail.com
Ed English	859-585-6493	ed.english@gmail.com
K. Gander		
Alberto Navar	707 357 4180	
Mary Alcocer	707 671 6734	
SERPY CARRELL	707-964-1653	
Dawn Fritchard	916-765-1482	

VOICE YOUR OPINION

I would like to see a Grocery Outlet go in on S. Franklin and Harbor.
Why? Jobs. More shopping options. Upgrade the building currently at that corner.

Please let the City Council and staff know by signing here:

Please Print:

Name:

Phone:

Email:

Kevin Clark

707-357-8434

ROCKETMANJAMESCLARK@gmail.com

Mary Baltezer

530-315-3250

Mary.reeb@AOL.com

John Peel
SAM ELFSON

707-357-3868

707 937-1712

Amy Lange

760-889-2127

amyange@icloud.com

Tom Mitchell

707 357 1280

Doc Elfson

707-937-1712

Jan Johnson

707-937-5738

Chawonda

707 937 1742

STEVEN FOWLER

707 357 4417

MENDO STEVEN @ EMAIL.COM

Henry Burum

707 823-5820

Wm Lane

707 824-1111

R. Aske

707-280-9226

REMODELSONM@GMAIL.COM

Colleen Brogan

707 357 8919

32416 Noyo Acres Dr

Ben Nunez

707 409-8202

400 N Harbor

David Jacobson

707-357-7582

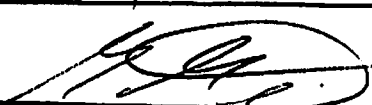
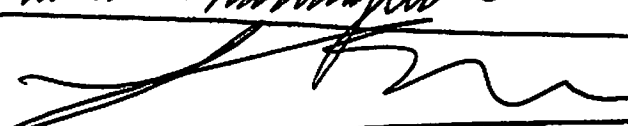
Cole Bohn

707-241-3874

EB

Fort Bragg LOCAL Business

WE THE UNERSIGNED ARE OPPOSED OF GROCERY OUTLET
COMING TO Fort BRAGG.

- 1 Pam Thiel
- 2 Roseanne Miklas
- 3 Jean Croley
- 4 Penny Noack
- 5 Ki Chan Mi
- 6 Sharon Auit
- 7 Jo Smith
- 8 Mary Theresa Anderson
- 9 Ellen Albrecht
- 10 Sophie Dade
- 11 Mike
- 12 Andrew
- 13 Connie Decker
- 14 Grady Gauthier 
- 15 Michele Herrick
- 16 Marie R Herrick
- 17 Valentin Parniguer
18.  Laurie Star

WE THE UNERSIGNED ARE OPPOSED ~~TO~~ ⁷⁰ GROCERY OUTLET
COMING TO Fort BRAGG.

- 19 ~~Wm Wilcox~~
- 20 Judith Edwards
- 21 Joan Burleigh
- 22 ~~Op~~
- 23 Patricia Black
- 24 Gwinn Seymour
- 25 V Ray!
- 26 Doug D. Fink
- 27 Bill Popov
- 28 ~~Manda Lupo~~
- 29 ~~James Stone~~
- 30 ~~Mary Beckley~~
- 31 ~~Jill Langford~~
- 32 ~~Kim Canfield~~
- 33 Maggie Watson
- 34 ~~Op~~
- 35 ALI GARCIA
- 36 Michael Finerty
- 37 Jewellette Clark
- 38 ~~Op~~
- 39 Andrea Pina
- 40 ~~Op~~ (Pam Sandberg)
- 41 ~~Judith Williams~~
- 42 ~~Marcy Snyder~~

Opposed to Grocery Outlet in
Fort Bragg

43. Kathleen McDonald

44. ERICA FIELDER

45. Ram Blahut

46.

47.

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60.

From: [Peters, Sarah](#)
To: [CDD User](#)
Subject: Grocery Outlet
Date: Wednesday, June 09, 2021 11:02:36 AM

From: [Simone Pias](#)
To: [Gurewitz, Heather](#)
Subject: Grocery Outlet
Date: Tuesday, May 25, 2021 9:48:14 PM

I hope that you do approve of the application for the Groceries Outlet to be built in Ft.Bragg. I have enjoyed shopping in many different Grocery Outlet shops and always leave feeling satisfied with their choices offered. They are individually owned, and in my opinion should not be considered a “franchise “.
Thank you,
Simone Pias

Sent from my iPad

From: tarantul99@aol.com
To: [CDD User](#)
Subject: Grocery outlet
Date: Saturday, May 22, 2021 10:06:13 PM

Local resident

Of Fort Bragg

I would love to have a grocery outlet in Fort Bragg. One to have a place to buy products at a reasonable price and a possible employment opportunity for myself as well as others in area.

Thank you

Rebecca Rinehart

Sent from my iPhone

From: [Anna Rogers](#)
To: [CDD User](#); [O'Neal, Chantell](#); [Gurewitz, Heather](#); [Miller, Tabatha](#)
Subject: Grocery Outlet
Date: Wednesday, May 26, 2021 2:55:00 PM

If the Grocery Outlet Market Project is allowed to go ahead, it would have an incredibly negative impact on our community.

Fort Bragg is held in regard throughout the state as a beautiful place and a desirable tourist attraction, and a desirable place for people to live. Fort Bragg should be a refuge from massive chains and commercial infrastructure. A Grocery Outlet (known colloquially as “gross out”) would be a blight on our small town, where now more than ever, we should be setting up already-present or newly created local(!) small businesses to thrive. Fort Bragg does not need its small businesses to compete with discount packaged food megastores. The Dollar Store is bad enough, and stores like this are known for bringing negative social and economic consequences wherever they go.

Fort Bragg is better than this. Please don't do this to our small businesses.

Sincerely,

Anna Rogers

17510 Franklin Rd. Fort Bragg. CA 95437

(415)846-7978

From: [Julie](#)
To: [CDD User](#); [O'Neal, Chantell](#); [Gurewitz, Heather](#); [Miller, Tabatha](#)
Subject: Coastal Development Plan CDP 8-19, Design Review DR 1-19, and Parcel Merger MGR 1-19, and adoption of the Mitigated Negative Declaration for the Grocery Outlet Bargain Market.
Date: Wednesday, May 26, 2021 3:00:30 PM

(NOTE: This is a corrected version of the letter I sent earlier today. Thank you, and sorry for the inconvenience.)

Fort Bragg Planning Commission:

I would like to express my strong opposition to the proposed Grocery Outlet.

We don't need any more dollar stores or big-box stores in our community. We have a lot of struggling small businesses, especially during this pandemic. Another dollar store would create unwanted competition with our local businesses.

We should be protecting the interests of the businesses that are already here. We have several grocery stores and drugstores that serve the needs of our residents and tourists, as you know.

In small rural towns, local grocery supermarkets have reported a 30% decline in sales after the introduction of a big box store to an area. Another large store would just take profit away from the businesses that have already established themselves as part of our community. Our community should be focusing on finding a way to fill all the empty store fronts downtown and polishing up that area to increase its appeal to residents and tourists.

I hope you will take the time to peruse these articles on the damages dollar stores/big box stores inflict upon communities.

When the Closest Grocery Store Is a Dollar Store - Bloomberg
<https://www.bloomberg.com/news/articles/2018-12-20/when-the-closest-grocery-store-is-a-dollar-store>

How Dollar Stores Became Magnets for Crime and Killing — ProPublica
<https://www.propublica.org/article/how-dollar-stores-became-magnets-for-crime-and-killing>

Excerpt: *"The [dollar] stores undercut traditional grocery stores by having few employees, often only three per store, and paying them little. "While dollar stores sometimes fill a need in cash-strapped communities, growing evidence suggests*

*these stores are not merely a byproduct of economic distress,” the brief reported.
“They’re a cause of it.”*

How Dollar Stores Prey on the Poor - [Progressive.org](https://progressive.org/magazine/dollar-stores-prey-on-the-poor-sainato-191001/)
<https://progressive.org/magazine/dollar-stores-prey-on-the-poor-sainato-191001/>

More Cities Pass Laws to Block Dollar Store Chains – Institute for Local Self-Reliance
<https://ilsr.org/more-cities-pass-laws-to-block-dollar-store-chains/>

The Dollar Store Backlash Has Begun
[https://getpocket.com/explore/item/the-dollar-store-backlash-has-begun?
utm_source=pocket-newtab](https://getpocket.com/explore/item/the-dollar-store-backlash-has-begun?utm_source=pocket-newtab)

In addition, if Fort Bragg wishes to attract tourists, the sight of another large discount store does nothing to enhance our desirability as a tourist destination. It makes us look poor and destitute. It would be a blight on our community.

Thank you for your time,

Sincerely,

Julie Rogers

Fort Bragg, CA

15 of Mai 2021 - to read at the hearing on 26 of Mai -
regarding Grocery Outlet

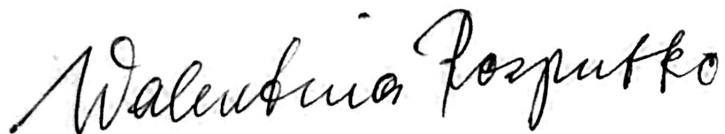
This is my second letter on the topic, and I have more to say than what I wrote on my first letter. Almost 37 years I have been in business here. I have supplied locals with clothing and other essentials for years. I have seen our town change with the loss of the mill, the fishing industry, recession, pandemic, and electrical outages.

I can say, not much changes for the better around here. Buildings are so run down. The same voices say do not come to town. If you were to stand behind my business counter and work here for a month, you would see the support and the reasons why you and your friends on the planning commission should vote for Grocery Outlet's application. You would see the people that come in at the beginning of the month with a little money in their pocket. You will see how slow it is during the week, and at the end of the month. Now that spring is here, weekends are picking up. So many people are without here.

I have given this store, and this city so much of my life. If you keep saying no to everything that comes across your desk, this city will continue to go downhill.

From someone who is up in years, don't be afraid of change. We need a few new things around here. If you are worried about the building looking like a sea side store, make it so. Just please bring Grocery Outlet to Fort Bragg.

Thank you and bye,



Walentina Rozputto

Surplus, etc. 18603 N Highway 1, Fort Bragg, CA 95437, Phone: 964 6467

From: moxie@mcn.org
To: [CDD User](#); [Gurewitz, Heather](#); Miller@mcn.org; [Miller, Tabatha](#)
Cc: [O'Neal, Chantell](#)
Subject: Grocery Outlet et al. PUBLIC COMMENT
Date: Tuesday, May 25, 2021 11:45:19 PM

Dear Planning Commissioners and City Council Members:

I want to add my voice to the chorus in opposition to approval of Coastal Development Plan CDP 8-19, Design Review DR 1-19, and Parcel Merger MGR 1-19, and adoption of the Mitigated Negative Declaration for the Grocery Outlet Bargain Market...

...And to voice my strong opposition to inviting ANY more discount chain stores into our fragile coastal economic community.

A firm LIMIT is what we need.

I will tell You that I am actually a fan of "GrocOut" (gross out) ~ BUT as a VERY occasional inland trip: every month or two is my family's limit.

The damage having one of these stores IN TOWN would be dramatic & tragic. It would be devastating to special independent stores such as Down Home Foods, Harvest Market & the various small Mexican Specialty markets, for starters. One has only to research the havoc wrought by Walmart upon small & midsize town commerce across America to see the inevitable extent of the damage caused by this blight of corporate expansion.

It should be possible to cap the incursion of such stores: we have one Dollar Tree...what earthly use would two such stores serve?

Leave Grocery Outlet in Willits & Ukiah, and every several weeks, when I have business in one of those towns, I'll drop in & get a deal on coconut oil. It takes more than a month to use up one of those big jars, & this preserves a sense of perspective.

The serious economic threats of this kind of development are well known & hopefully documented elsewhere in this discourse.

Please heed them & take my comments into Your Consideration

Vote "NO" on more cheap chain stores.

Thank You for your Attention to this issue.

K Rudin
Westport, CA. 95488
moxie@mcn.org