

# Appendix E

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VMT Assessment Memorandum

# Draft Memorandum

Date: September 20, 2024  
To: Aileen Mahoney, Rincon Consultants  
From: Ian Barnes, PE, and Bruno Lertora, Fehr & Peers  
Subject: **Santero Way Specific Plan Project VMT Assessment**

*WC24-4047.00*

This memorandum summarizes the CEQA Vehicle-Miles Traveled (VMT) assessment for the Santero Way Specific Plan (Project) in Cotati, California.

## Project Description

The Project is located within the city of Cotati in Sonoma County and includes parcels along East Cotati Avenue and Santero Way. The Project, as proposed, would result in a net increase of 769 residential units, 651,365 square feet of commercial development, and approximately 1,800 residents, as compared to existing conditions in the Project area.

## VMT Analysis Methodology

This section describes Fehr & Peers' approach, and CEQA screening criteria for the VMT assessment.

## CEQA Guidelines Appendix G: Transportation Checklist

The California Environmental Quality Act (CEQA) Guidelines were updated in December 2019 per Senate Bill 743 (SB 743, 2013) to remove Level of Service (LOS) from CEQA analysis and to require the use of VMT to evaluate a Project's environmental effect on the transportation system. VMT measures the amount of driving generated by the project and thereby the impacts on the environment from those miles traveled. SB 743 changes the focus of transportation impact analysis in CEQA from measuring impacts to drivers to measuring the environmental impact of driving.

The relevant CEQA Guidelines Appendix G checklist questions for CEQA Transportation impact evaluation are shown below.

Would the project:

*Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? [Criterion B]*

Criteria A, C, and D in the CEQA Transportation checklist are related to consistency with adopted plans and policies related to the multimodal circulation system, circulation system hazards, and emergency vehicle access.

### **CEQA Checklist Criterion B: Vehicle-Miles Traveled (VMT)**

Criterion B is the formal implementation of the SB 743 requirement to analyze VMT as part of the CEQA Transportation section. Under SB 743, congestion related project effects (such as those measured by LOS or similar metrics) are deemed to be not a suitable basis on which to determine a significant environmental effect. Relevant subsections of CEQA Guidelines section 15064.3(b) for the project read as follows:

- (1) **Land Use Projects.** Vehicle-miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle-miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
  
- (4) **Methodology.** A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

The Governor's Office of Planning and Research (OPR), in their *Technical Advisory on the Evaluation of Transportation Impacts in CEQA* (December 2018), has provided non-binding guidance on thresholds that could be used in the analysis of CEQA transportation impacts, using VMT as the quantified metric for evaluation. The basis of these OPR-recommended thresholds includes state climate planning documents and legislation.

In its discretion as lead agency, the City of Cotati has the ability to select the methodology and CEQA significance criteria for use in the CEQA Transportation section. The City of Cotati has updated locally applicable CEQA metrics, methodology, and significance criteria, with formal

adoption in September 2020. Furthermore, the City of Cotati's guidelines, based on OPR's *Technical Advisory*, suggest the following criteria for analyzing transportation projects:

"Land Use Project. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. **Generally, projects within ½ mile of either an existing major transit stop (ex. SMART station) or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.** Certain projects that decrease vehicle miles traveled in the project area compared to existing conditions may be presumed to have a less than significant transportation impact."

Additionally, based on the Guidelines' VMT screening process, projects can be screened based on the following criteria:

- Small Infill Projects: 110 or fewer daily vehicle trips. Project sponsors should consult the latest published trip generation tables, or demonstrate that the project will generate less than 110 daily vehicle trips.
- Map-Based Screening for Residential and Office Projects: Low-VMT generating areas as shown on the screening maps that follow.
- Near transit station (i.e. SMART): Within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor (CEQA Guidelines section 15064.3(b)(1)).
- Affordable Housing: 100% affordable housing.
- Local-Serving Retail: Projects including retail uses up to a combined total of 10,000 gross square feet.
- Mixed-Use Projects: Evaluate each component independently and apply the significance threshold for each project type (residential /retail).
- Local-Serving Public Facilities (excluding schools): Publicly-owned local-serving facilities such as: Library, Community Center, City Hall, Public Safety Station, Passive Parks, Public Utilities Offices or Infrastructure.

## CEQA Transportation VMT Screening Assessment

The following section summarizes Fehr & Peers' findings from the VMT screening assessment.

### **Criteria: Is the Project located in one of the areas identified in the screening map for residential and office projects?**

Under the City's guidelines, projects located in areas that have been shown to generate VMT below the threshold of significance may be presumed to have less than significant impacts and no further VMT analysis would be required. Screening maps provided by the City, using data from

the Sonoma County Transportation Authority (SCTA) Sonoma County Travel Demand Model, were used in determining whether the Project is located in an area where VMT per capita is expected to be below the CEQA threshold of significance. While the Project includes both residential and commercial land uses, the Guidelines note that only residential, office and industrial projects can be screened out based on the screening maps.

Using the screening maps provided in the City's guidelines, the Project's parcels are located in areas identified in the residential screening map as areas that may be presumed to generate VMT at or below the adopted threshold and would have less than significant transportation impacts (and thus no further analysis would be required).

*Assessment Result: Only the Project's residential developments are located in a low VMT area.*

### **Criteria: Is the Project located within a half-mile of a high quality transit station or stop?**

Public transit services in the Santero Way Specific Plan area include services by the Sonoma-Marin Area Rail Transit (SMART) passenger rail system. The SMART passenger rail service currently runs from the Sonoma County Airport station in the north to the Larkspur Ferry Terminal in the south. The Cotati SMART station is currently served by 19 weekday southbound trips and 19 weekday northbound trips; weekday service is provided from 5:01 AM to 9:43 PM. On weekends, the Cotati SMART station is served by eight southbound trips and nine northbound trips, with weekend service being provided from 7:38 AM to 8:24 PM.

According to OPR's *Technical Advisory*, an existing major transit stop is defined as:

"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."

Per OPR's *Technical Advisory* definition, the Cotati SMART station can be considered as an existing major transit station, and the entirety of the Project parcels is within one half-mile of this station.

*Assessment Result: Yes, the Project is within one half-mile of a major transit station.*

### **Conclusion**

Thus, based on the VMT screening assessment, the Project does meet the City's screening criteria, and the Project can be presumed to cause a **less-than-significant impact**.

This concludes our assessment. Please contact Bruno Lertora at [b.lertora@fehrandpeers.com](mailto:b.lertora@fehrandpeers.com) if you have questions or comments.