

**Appendix C:
Transportation Supporting Information**

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July 3, 2024

Ms. Mary Bean
First Carbon Solutions
2999 Oak Road, Suite 250
Walnut Creek, CA 94597

VMT Assessment for the Downtown Housing & Economic Opportunity Overlay in Petaluma

Dear Ms. Bean;

As requested, W-Trans has prepared a Vehicle Miles Traveled (VMT) assessment for the proposed Downtown Housing & Economic Opportunity Overlay project in Petaluma. The project includes the proposed Petaluma Appellation Hotel development as well as a zoning overlay that could result in a net increase in employment-generating uses such as retail, office, and commercial in designated areas of downtown Petaluma. The VMT assessment is consistent with the guidance contained in the City of Petaluma's *Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines, 2021* ("VMT Guidelines") and has been conducted using VMT data obtained from the SCTM19 travel demand model maintained by the Sonoma County Transportation Authority (SCTA). The analysis considers the potential VMT-related effects of adding a total of 387,444 square feet of development on designated parcels in the downtown area.

VMT Screening

CEQA allows for the use of screening criteria to identify certain types of projects that can be expected to cause a less-than-significant impact without needing to conduct a detailed analysis (CEQA Guidelines Sections 15063(c)(3)(C), 15128, and the environmental checklist included in CEQA Appendix G). Projects that qualify for VMT screening may be presumed to have a less-than-significant environmental impact on transportation VMT. Following is an assessment of three screening parameters that apply to the proposed project.

Screening for Projects in Proximity to a Major Transit Stop

Petaluma's VMT Guidelines indicate that development projects within one-half mile of the Downtown Petaluma SMART station may generally be presumed to have a less-than-significant VMT impact. In addition to being within the defined area, projects must not: have a Floor Area Ratio (FAR) of less than 0.75, include more parking than required by the City, be inconsistent with Plan Bay Area, or replace affordable residential units.

Several of the individual sites comprising the project, including the proposed hotel, are within one-half mile of the SMART station. However, several parcels on Liberty Street and Keokuk Street are just outside the half-mile radius so would not qualify for major transit stop proximity screening. It is also unknown whether future specific development proposals on parcels associated with the zoning overlay (i.e., those other than the proposed hotel) would achieve the minimum FAR ratios, or whether individual developers would choose to provide more parking than required by the zoning code. Accordingly, the applicability of the major transit stop screening to the project's parcels associated with the zoning overlay is uncertain, so cannot be relied upon exclusively for CEQA purposes.

A figure showing the project parcels and their proximity to the half-mile SMART station radius is shown in Plate 1.



Plate 1 – Project Parcels and SMART Proximity

Unlike the zoning overlay component of the project, site-specific development details are known for the proposed Appellation Hotel project on the southwest corner of Petaluma Boulevard South/B Street. The hotel was found to qualify for major transit stop VMT screening in the *Traffic Impact Study for the Petaluma Appellation Hotel Project*, W-Trans, September 2023. That report provides further details, including a discussion of both the employee and visitor VMT characteristics of the hotel.

Screening for Projects Located in Low-VMT Areas

The VMT Guidelines allow the City to screen out residential and employment projects located in designated low-VMT areas, as defined using output from the SCTA travel demand model. The type of development being considered should already be present in the vicinity, or in this case the same SCTA model traffic analysis zone (TAZ), to ensure that similar land uses are reflected in the model's baseline VMT data. This screening parameter would be applicable to employment-based uses such as offices in the zoning overlay component of the proposed project, as well as employment-based components of other uses including the proposed hotel.

The entirety of the proposed project is contained within TAZ 796 of the SCTA travel demand model, as shown in Plate 1. The SCTA model indicates that TAZ 796 currently contains approximately 257,000 square feet of office uses and 481,000 square feet of commercial retail uses. The estimated employment in the TAZ, including office, retail, and all other land uses, is approximately 2,541 persons. The VMT characteristics associated with office, retail, and other employment-based uses such as those potentially resulting from the proposed project are therefore captured in the SCTA model.

The City's screening map for employment-based uses is contained in the *City of Petaluma Final Citywide TDM Requirements*, Fehr & Peers, 2021. An excerpt of the screening map showing downtown Petaluma and the project area is shown in Plate 2. As depicted in the screening map, the entirety of the area containing the project sites is depicted with green shading, indicating that the area qualifies for VMT screening for employment-based uses. Accordingly, all employment-based land use types such as offices would be screened from further VMT analysis and be presumed to have a less-than-significant VMT impact.

Screening for Local-Serving Retail Projects

The City's VMT Guidelines indicate that local-serving retail projects of 30,000 square feet or less, excluding uses with drive-throughs, qualify for VMT screening. Currently, most, if not all, individual retail uses in downtown Petaluma are well below 30,000 square feet in size, and in considering typical retail development patterns as well as the sizes of parcels included in the proposed overlay, it is unlikely that any future retail use allowed within the

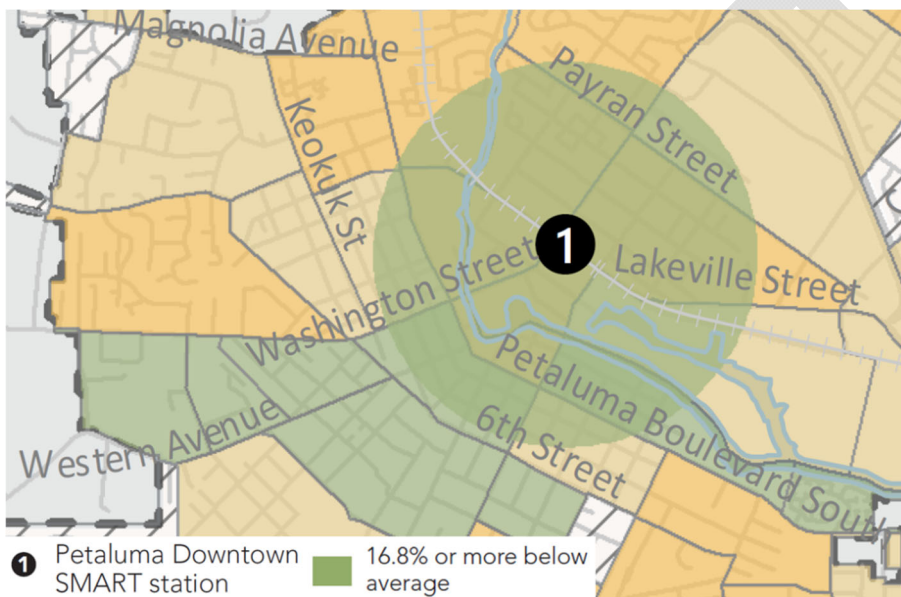


Plate 2 – Screening Map for Employment-Based Uses (source: excerpt from “Home-Based Work VMT per Employee” exhibit in *City of Petaluma Final Citywide TDM Requirements*, 2021, Fehr & Peers)

overlay area would exceed 30,000 square feet for any individual project. However, because specific details about potential development projects occurring within the overlay are unknown (such as specific development sizes and breakdowns of building space by land use), it cannot be concluded with certainty that every potential retail project would contain 30,000 square feet or less of floor space.

While projects occurring within the overlay that contain 30,000 square feet or less of retail space would be screened from further VMT analysis and be presumed to have a less-than-significant VMT impact, projects exceeding that amount of retail would require further VMT assessment.

Recommended Mitigation Measure – Proposed projects within the overlay that individually include more than 30,000 square feet of retail uses or otherwise do not qualify for local-serving retail VMT screening criteria established by the City of Petaluma shall be required to perform a project-level VMT analysis, incorporating measures as needed to achieve the City's VMT thresholds of significance for retail uses.

Screening Summary

All components of the proposed Downtown Housing & Economic Opportunity Overlay would qualify for one or more of the City's VMT screening criteria. The hotel component would qualify for Major Transit Stop screening, and the employment aspects of the hotel would qualify for Low-VMT Area screening. Employment-based uses facilitated by the zoning overlay component of the project would qualify for Low-VMT Area screening, and certain properties within one-half mile of the SMART station may also qualify for Major Transit Stop screening. Retail uses that are individually 30,000 square feet or less in size would qualify for local-serving retail screening, with remaining retail projects exceeding 30,000 square feet (if any) required to perform project-level VMT assessments and incorporate measures to comply with the City's retail VMT threshold of significance.

Because all land use components of the proposed project would qualify for one or more of the City's VMT screening parameters, or in the case of large retail uses exceeding 30,000 square feet be required to perform project-level VMT analyses and meet retail VMT significance thresholds, the project may be presumed to have a less-than-significant impact on VMT.

Additional Supporting VMT Analysis

As indicated above, the project qualifies for VMT screening criteria established by the City of Petaluma and therefore may be presumed to have a less-than-significant VMT impact. In order to provide further support for this conclusion, an additional quantitative VMT assessment was performed using output from the SCTA travel demand model, with results compared to the VMT significance metric established by the City for employment-based uses.

The City of Petaluma has set its VMT significance threshold for employment-based uses at a level corresponding to 16.8 percent below the Bay Area regional average. Per the City's VMT Guidelines, the regional average VMT per employee is 22.7 miles, which translates to a significance threshold of 18.9 VMT per employee. The proposed project is wholly encompassed within TAZ 796, which according to the SCTA travel demand model has a baseline of 15.5 VMT per employee.

Consideration was given to whether adjustments to the baseline per-employee VMT estimates produced by the SCTA model are warranted to reflect the project's characteristics. SCTA has developed a VMT Reduction Tool to assist in making project-specific VMT adjustments as well as to quantify VMT mitigation measures. One of the characteristics having the greatest influence on VMT levels, thereby requiring adjustments to baseline values, pertains to density. In general, as the residential or employment density of a project or area increases, the vehicle miles traveled per person decreases.

Based on data contained in the SCTA model, TAZ 796 has an existing job density of 46.0 jobs per acre. The estimated 387,444 square feet of additional development associated with the proposed project is estimated to result in 628 to 1,286 additional jobs, with the lower end of the range assuming all retail development and the upper end of the range assuming office development¹. Conservatively assuming the low-range estimate of 628 added jobs, the job density in TAZ 796 would increase to approximately 57.4 jobs per acre. The SCTA VMT Reduction Tool estimates that this increase in job density would reduce baseline VMT per employee by 1.7 percent. Applying this percentage reduction yields an adjusted value of 15.2 VMT per employee for the project and TAZ 796, which is 20 percent below the applicable significance threshold of 18.9 VMT per employee. A summary of the VMT analysis is shown in Table 1.

¹ The employment to square footage factors contained in the SCTA travel demand model assume 3.32 jobs per thousand square feet for office uses and 1.62 jobs per thousand square feet of retail commercial uses

Table 1 – Vehicle Miles Traveled Analysis Summary

VMT Metric	VMT per Employee		Project VMT per Employee		
	Regional Average	Significance Threshold ¹	Unadjusted (TAZ 796)	Adjusted (Job Density) ²	Threshold Met?
VMT per Employee (Regional Baseline)	22.7	18.9	15.5	15.2	Yes

Notes: VMT Rate is measured in home-based commute VMT per Employee; TAZ=Traffic Analysis Zone; ¹ equal to 16.8 percent below regional average; ² includes adjustments for TAZ job density per methodology contained in the SCTA VMT Reduction Tool

This supplemental assessment confirms that the proposed project would have a less-than-significant impact on VMT per employee, even if the project did not qualify for screening though further analysis is still recommended for retail projects having a floor area exceeding 30,000 square feet.

Conclusions

- The proposed hotel component of the project qualifies for the City’s Major Transit Stop screening and may be presumed to have a less-than-significant impact on VMT.
- Future development facilitated by implementation of the zoning overlay component of the project would qualify for one or more of the City’s VMT screening parameters and may be presumed to have a less-than-significant impact on VMT; one exception would be retail uses exceeding 30,000 square feet.
- Upon application of the City of Petaluma’s VMT screening criteria along with implementation of the recommended mitigation measure pertaining to retail projects over 30,000 square feet, the proposed project would be considered to have a less than significant impact on VMT.
- The proposed project would result in a less-than-significant impact on VMT per employee even if VMT screening parameters were unmet.

Recommended Mitigation Measure

- Proposed projects within the overlay that individually include more than 30,000 square feet of retail uses or otherwise do not qualify for local-serving retail VMT screening criteria established by the City of Petaluma shall be required to perform a project-level VMT analysis, incorporating measures as needed to achieve the City’s VMT thresholds of significance for retail uses.

Thank you for giving W-Trans the opportunity to provide these services. Please contact me if you have any questions.

Sincerely,

Zachary Matley, AICP
Principal

JZM/PET253.L1

Enclosure: VMT Summary Sheet

Downtown Housing & Economic Opportunity Overlay VMT Analysis

W-Trans 7/2/2024

Employment VMT Threshold

22.7 VMT/Employee Regional Average (City of Petaluma VMT Guidelines)

18.9 City of Petaluma Threshold = 16.8% below Regional Average

Base Unadjusted Project VMT

15.5 Base VMT/Employee from SCTA Model - Project in TAZ 796

VMT Adjustments

Employment Density Adjustment

387,444 Project Incremental Increase in Square Footage

617 Square Feet per Employee (based on SCTA model inputs for commercial land uses)

628 Estimated incremental increase in Jobs

	Baseline	Project Change	Plus Project
TAZ 796 Acreage	55.2	0	55.2
Jobs	2541	628	3169
Job Density (jobs/acre)	46.0		57.4

Formula: % Change in VMT = (Job Density with Project - Baseline Job Density) /
Baseline Job Density * 0.07 Elasticity

-1.7% VMT Reduction

-0.3 Adjustment to Baseline VMT/Employee

Adjusted VMT

15.5 Base VMT/Employee from SCTA Model

-0.3 Adjustment to Baseline VMT/Employee

15.2 Adjusted Project VMT/Employee

18.9 Significance Threshold

YES Is threshold met?