

2022

SB 743 Implementation Policy



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City of Manteca
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1. INTRODUCTION

The Transportation Impact Analysis Guidelines document provides guidance to City of Manteca (City) staff, applicants, and consultants on the requirements to evaluate transportation impacts for projects in the city for the purpose of determining impacts under the California Environmental Quality Act (CEQA). The Transportation Impact Analysis Guidelines are intended to:

- promote conformance with applicable City and State regulations;
- provide evaluation consistent with CEQA;
- ensure consistency in preparation of studies by applicants and consultants; and
- provide predictability in content for City staff and the public in reviewing studies.

Although these guidelines are intended to be comprehensive, not all aspects of every transportation analysis can be addressed within this framework. City staff reserve the right to use judgement to request exemptions and/or to modify requirements for specific projects at the time of the review application.

1.1. Background

The Transportation Impact Analysis Guidelines specifically address the requirements of California Senate Bill 743 (SB 743) which mandates specific types of CEQA analysis of transportation projects, effective July 1, 2020.

1.1.1. SB 743 Requirements

Prior to implementation of SB 743, CEQA transportation analyses of individual projects typically determined impacts on the circulation system in terms of roadway delay (i.e., congestion) and/or capacity usage at specific locations, such as street intersections or freeway segments. Senate Bill 743, signed into law in September 2013, requires changes to the guidelines for CEQA transportation analysis. The changes include the elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining transportation impacts. The purpose of SB 743 is to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.

Under SB 743, a project's effect on automobile delay shall not constitute a significant environmental impact under CEQA. Therefore, LOS and other similar vehicle delay or capacity metrics may no longer serve as transportation impact metrics for CEQA analysis. The California Office of Planning and Research (OPR) has updated the CEQA Guidelines and provided a final technical advisory (December 2018), which recommends vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts under CEQA. The California Natural Resources Agency certified and adopted the CEQA Guidelines including the Guidelines section implementing SB 743. The changes have been approved by the Office of the Administrative Law and took effect on July 1, 2020.

LOS analysis is still appropriate and necessary to determine consistency with General Plan policies as they relate to LOS. More specifically, Appendix G of the CEQA Guidelines asks whether a project would "conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities." As the City's currently adopted 2014 General Plan Circulation Element includes a LOS standard, in order to ensure that a project is consistent with the General Plan policy, a LOS analysis may be required at the request of the City Engineer to determine necessary

roadway infrastructure improvements and capacity. Any improvements necessary to ensure LOS standards are met may be required as part of the project entitlement.

The City may also utilize LOS standards for scheduling and programming purposes for roadway improvements within the Capital Improvement Program (CIP).

1.1.2 General Plan Consistency

The intent of this policy document is to directly implement the City's Air Quality Goal 2 to, "Integrate air quality planning with land use and transportation planning processes in order to reduce vehicle miles traveled in the City and by commuters."

Directly related to this goal are Circulation, Land Use and Community Design Element Goals. Below are General Plan Goals that directly support Air Quality Goal 2:

- Circulation Element Goal 2, "Provide complete streets designed to serve a broad spectrum of travel modes, including automobiles, public transit, walking, and bicycling."
- Circulation Element Goal 5, "Balance the level of service for all modes so that residents and visitors have a variety of transportation choices."
- Land Use Goal 7, "Reinforce land use and development patterns that encourage walking and the use of public transit within the community."
- Land Use Goal 8, "To reinforce strong urban design, quality development and a compact city form."
- Community Design Element Goal 10, "Establish a pedestrian and bicycle friendly environment in neighborhoods and commercial and office land use areas."

In addition to VMT analysis of development projects, the City recognizes the need to evaluate LOS as a measurement of system efficiency. General Plan Circulation Element Policy C-P-1 calls for, "The City shall strive to balance levels of service (LOS) for all modes (vehicle, transit, bicycle, and pedestrian) to maintain a high level of access and mobility, while developing a complete and efficient circulation system. The impact of new development and land use proposals on LOS and accessibility for all modes should be considered in the review process."

The vehicular LOS goal is a LOS "D" or better as directed by General Plan Circulation Policy C-P-2. Circulation Element Implementation Policy C-I-2 calls for the need to "Perform periodic evaluation of the mobility and access on major streets, which could include evaluation of vehicular LOS conditions, as well as access and mobility issues faced by transit riders, bicyclists, and pedestrians. The use of multimodal LOS analysis techniques could also be included." The use of user stress levels as identified in the City's Active Transportation Plan, as amended, will be used to determine LOS for active modes of transportation.

1.1.3. Transportation Equity

Pursuant to SB 535, a majority of the census tracts within Manteca are considered disadvantaged communities. The State developed CalEnviroScreen to map the most disadvantaged communities within the state. The Map below shows that most of Manteca is considered disadvantaged.

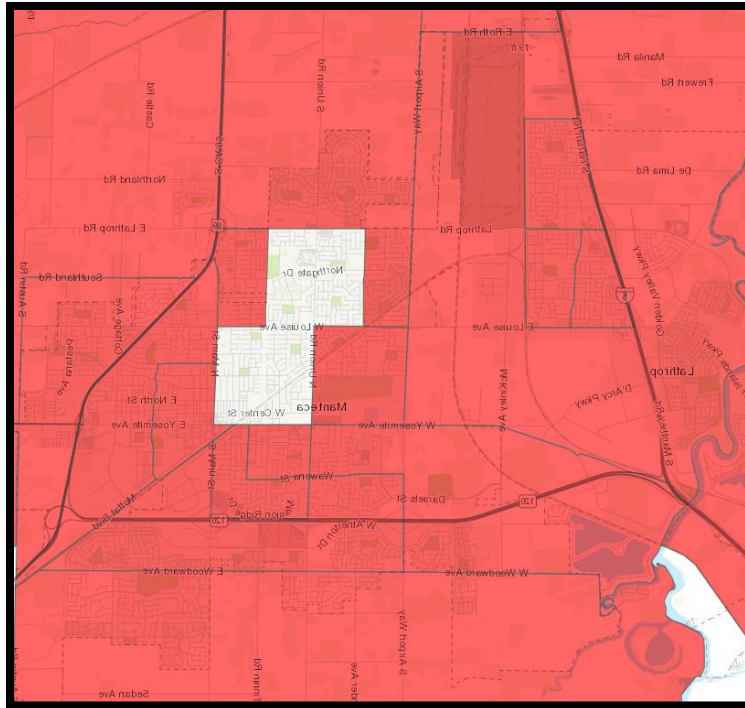


Figure 1.1.3-A CalEnvionScreen 4.0 SB 535 Disadvantaged Communities Map

Being a disadvantaged community, Manteca’s analysis of VMT is consistent with the intent of SB 1000 that calls for the City, “to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel.”

The City’s Housing Element, Goal H-1 is, “To promote the development of affordable housing in the City of Manteca.” Traditional measures of housing affordability ignore transportation costs. Typically a household’s second-largest expenditure, transportation costs are largely a function of the characteristics of the neighborhood in which a household chooses to live. Location Matters. Compact and dynamic neighborhoods with walkable streets and high access to jobs, transit, and a wide variety of businesses are more efficient, affordable, and sustainable.

The Center for Neighborhood Technology (CNT) monitors and reports the Housing plus Transportation Index (H+T). By taking into account the cost of housing as well as the cost of transportation, H+T provides a more comprehensive understanding of the affordability of place. Dividing these costs by the representative income illustrates the cost burden of housing and transportation expenses placed on a typical household. While housing alone is traditionally deemed affordable when consuming no more than 30% of income, the H+T Index incorporates transportation costs—usually a household’s second-largest expense. Affordability can be defined as households spending less than 45 percent of their budgets on transportation and housing combined, so a typical household that spends 30 percent of its budget on housing has 15 percent to spend on transportation.

Manteca residents currently spend approximately 61% of their income on H+T costs. This higher than average H+T cost leaves less for discretionary income for Manteca residents, 39% of income for Manteca residents compared to the expected average of 55%. The pie graph below depicts the average income expenditures for a Manteca household.

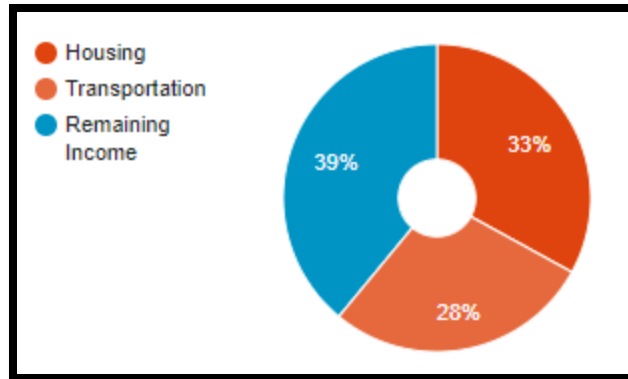


Table 1.1.3-A Manteca Average Housing + Transportation Costs

The average housing cost as a percentage of income of 33% is higher than the 30% considered affordable. The transportation cost as a percentage of income at 28% is much higher than the nationally expected 15%. This larger than normal percentage of income spent on transportation costs is borne by conventional development patterns within Manteca. As compared to neighborhoods in all 955 U.S. regions in the CNT index Manteca neighborhoods have a very low access to jobs (score of 0.6); are car dependent with very limited access to public transit (score of 0.8) while having a moderate density and walkability (score of 4.6). The result is that the average Manteca household emits an estimated 9.65 tons of GHG annually. The goal of the City’s VMT policy is to bring the transportation costs within Manteca into alignment with the national average. This reductions goal is an 18% reduction in transportation costs that is roughly proportional to the VMT reduction goal of 15%. The City will periodically review the H+T Index and may adjust VMT policies accordingly.

The evaluation of VMT impacts of projects rather than LOS is intended to assist Manteca in achieving a greater H+T affordability to all residents. VMT better measures the effectiveness of the allocation of resources for all residents. The following table illustrates how VMT methodology compares to LOS methodology.

Level of Service (LOS)	Vehicle Miles Traveled (VMT)
Measures project vehicles at intersections	Measure total project vehicle miles generated
Measures Peak Hour only	Measures travel all day
Focus on automobile travel	Focus on all modes of travel
Facilitates driving	Facilitates other transportation options
Increases vehicle capacity	Improves pedestrian, bicycle and transit access
Encourages greenfield development	Encourages infill development
Increases GHG emissions	Reduces GHG emissions

The figure below compares indicators of walking, bicycling, and public transit demands with expenditures on their infrastructure. This suggests that equity justifies investing 10 to 30 percent of infrastructure spending on these modes. The last column shows the estimated portion of transportation infrastructure expenditures made in each mode, which is smaller than most indicators of demand; this indicates that residents who rely on non-auto modes receive less than their share of investments.

Identifying VMT as the traffic and circulation environmental impact associated with development will facilitate the allocation of resources to ensure that all residents of the City share and benefit equally in Manteca’s complete transportation system.

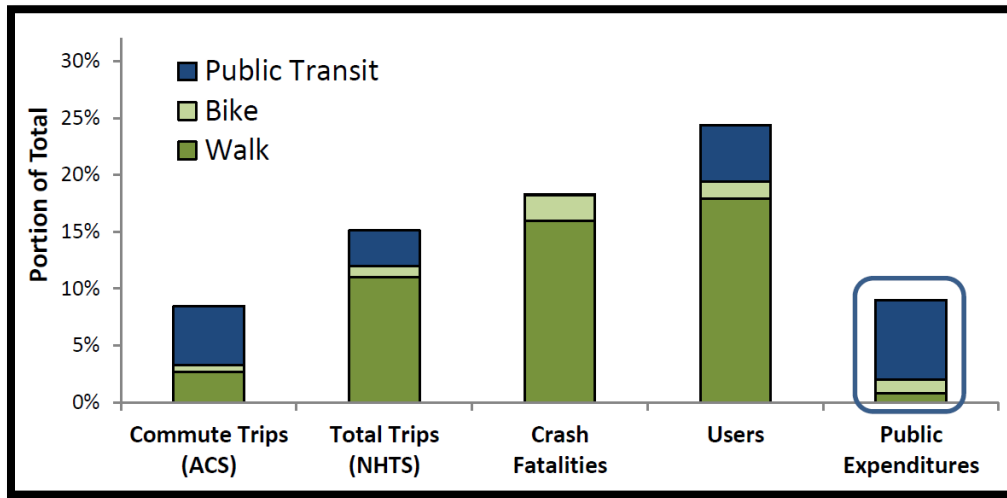


Figure 1.1.3-B Modes of Transportation Comparative Analysis. This figure compares indicators of walking, bicycling, and public transit travel demands with estimated expenditures on their infrastructure. This indicates that non-auto modes receive less than their fair share of investments. (ACS = American Community Survey. NHTS = National Household Travel Survey.). Source: Victoria Transport Policy Institute.

1.2.1. Local Transportation Impact Analysis Guidelines

General Plan Circulation Element Implementation Measure 3, directs that, “The City shall develop Transportation Impact Analysis (TIA) Guidelines to provide guidance on identifying deficiencies and impacts on all modes of transportation caused by new development. The TIS guidelines will also provide guidance on the types of mitigation measures that would be appropriate to mitigate project-related impacts to transportation facilities in the City. The TIS guidelines will address impact thresholds for vehicular, transit, bicycle, and pedestrian facilities.”

A TIA will analyze the project’s influence on the surrounding intersections and roadway network utilizing level of service (LOS) for all project scenarios. The document also includes the identification of pedestrian, bicycle, and transit amenities and associated user stress levels. The purpose of a TIA is to ensure the goals, objectives, and policies adopted by the City are supported and implemented while monitoring the capacity for the roadway networks for all modes of transportation.

The Engineering Department in coordination with the Development Services Department determines the need for a transportation analysis in conformance with the CEQA guidelines and City policies. The City recognizes the changes to CEQA regarding SB 743 implementation and will also require VMT analysis. Additionally, the City recognizes the need to maintain consistency with the direction to for local TIA’s. TIA’s in turn may take the form of either a Local Transportation Study (LTS) or Local Transportation Assessment (LTA).

1.2.2. Local Transportation Study (LTS)

A LTS will be required if a project exceeds 1,000 ADT and is consistent with the adopted General Plan. If a project is inconsistent with the adopted General Plan, an LTS will be required if the project exceeds 500 ADT.

The following scenarios comprise a LTS and may be modified in agreement with the City Engineer and Development Services Director.

- Existing Conditions
- Existing Conditions Plus Project
- Existing Conditions Plus Near-Term Cumulative Projects
- Existing Conditions Plus Near-Term Cumulative Projects Plus Project
- Buildout Conditions (2040)
- Buildout Conditions Plus Project

1.2.3. Local Transportation Assessment (LTA)

A LTA helps the City monitor development impacts on the transportation network and is similar to a Local Transportation Study (LTS). The main difference between the two studies is a LTA analyzes fewer scenarios than a LTS. A LTA will be required if a project is less than 1,000 ADT but is anticipated to influence the surrounding environment. A project may be required to complete either a LTS or LTA based on the City's discretion but not both.

A Local Transportation Assessment (LTA) will be required to analyze the following scenarios based on the thresholds identified for the project's ADT.

- **A project that generates between 200-500 ADT will be required to analyze existing conditions and existing conditions plus project.**
- **A project that generates between 500-1,000 ADT will be required to analyze existing conditions, existing conditions plus project, existing conditions plus near-term cumulative projects, and existing conditions plus near-term cumulative projects plus project.**

The study requirements are subject to the discretion of the City Engineer.

1.2.4. City and Interagency Coordination

Early consultation between the developer and the City is strongly recommended to establish the base input parameters, assumptions, and analysis methodologies for the transportation study. To avoid unnecessary delays or revisions and to streamline document preparation and the review process, the applicant should submit and have comments back from a project Preliminary Staff Review that will include an approved a Project Information Form (PIF) prior to the preparation and application of a draft CEQA or LTS/LTA document. The Project Information Form can be found in Appendix A.

The applicant will be responsible for coordinating with external agencies if a proposed project is expected to affect another agency or jurisdiction such as SJRTD, Caltrans, Lathrop, Ripon, or other

entities. This should be identified early on in the process and is the responsibility of the project applicant to ensure the transportation analysis will fulfill necessary requirements for all agencies involved.

Transportation studies must be prepared under the supervision of a registered California Traffic Engineer who has demonstrated knowledge and experience preparing transportation analysis. All applications to the City must be stamped by a registered California Traffic Engineer or equivalent as approved by the City Engineer. It is expected any report submitted to the City for review contains objective analyses and upholds engineering ethics and standards.

1.2.5. Trip Generation/Distribution Procedure

The traffic consultant for the project applicant shall identify the number of trips generated by the project using the trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual. The most recent version of the aforementioned document should be used.

In the event the land use is unique, the project applicant, in agreement with the City Engineer, should collect trip generation data at a minimum of two similar project sites. The project sites and method of collection shall be approved by the City Engineer prior to data collection initiation. The City Engineer has the discretion to request additional sites to be studied.

1.2.6. Trip Reduction

Based on the project improvements in relation to bicycle, pedestrian infrastructure and proximity to transit, trip reductions may be applicable and should be discussed with the City Engineer. If the project is eligible for a trip reduction, the reduction rates outlined in ITE's Trip Generation Manual shall be utilized unless another methodology is justified and more appropriate, such as *SANDAG'S Not so Brief Guide To Vehicular Traffic Generation Rates for the San Diego Region*. Project backup documentation related to trip reduction rates shall be provided to the City.

1.2.7. Trip Distribution / Assignment Procedure

Typically, two methods are used to determine trip distribution and assignment for transportation analysis and are considered acceptable by the City.

- The first method utilizes engineering judgement based on existing traffic data and land use patterns. This method requires the consultant to provide a map with project distribution and trip assignments to the City for review prior to conducting analysis.
- The second method utilizes the City of Manteca Travel Demand Model to perform a select zone or link analysis. **This approach is typically used for larger projects and shall be used for any project that generates over 2,400 ADT.**

Once trip distribution and assignment assumptions are submitted to the City, the City will review and provide feedback on assumptions. If necessary, the developer or consultant may coordinate with the City Engineer to discuss trip distribution and assignment for any clarification or considerations to travel patterns that are not readily apparent.

2. CEQA ANALYSIS REQUIREMENTS

This section discusses the requirements for conducting analyses for projects under environmental review, consistent with requirements from SB 743. Under CEQA, the City has the authority to determine the significance thresholds and methodologies for technical analysis, taking into account development patterns, policy goals and context. The City has the ability to make specific decisions regarding methodology and thresholds, presuming their choices are supported by substantial evidence.

- The CEQA Appendix G Environmental Checklist Form identifies the following four impact types for transportation:
- Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) (requirement to use VMT)?
- Would the project substantially increase hazards due to a geometric feature or incompatible uses?
- Would the project result in inadequate emergency access?

Consistent with State CEQA Guidelines section 15064.3, the City of Manteca has adopted thresholds of significance to determine when a project will have a significant transportation impact based on VMT. The City has developed screening criteria to streamline the analysis for projects that meet certain criteria, referred to as Project Screening, as further described below in Section 2.1.1.

2.1. Land Use Projects

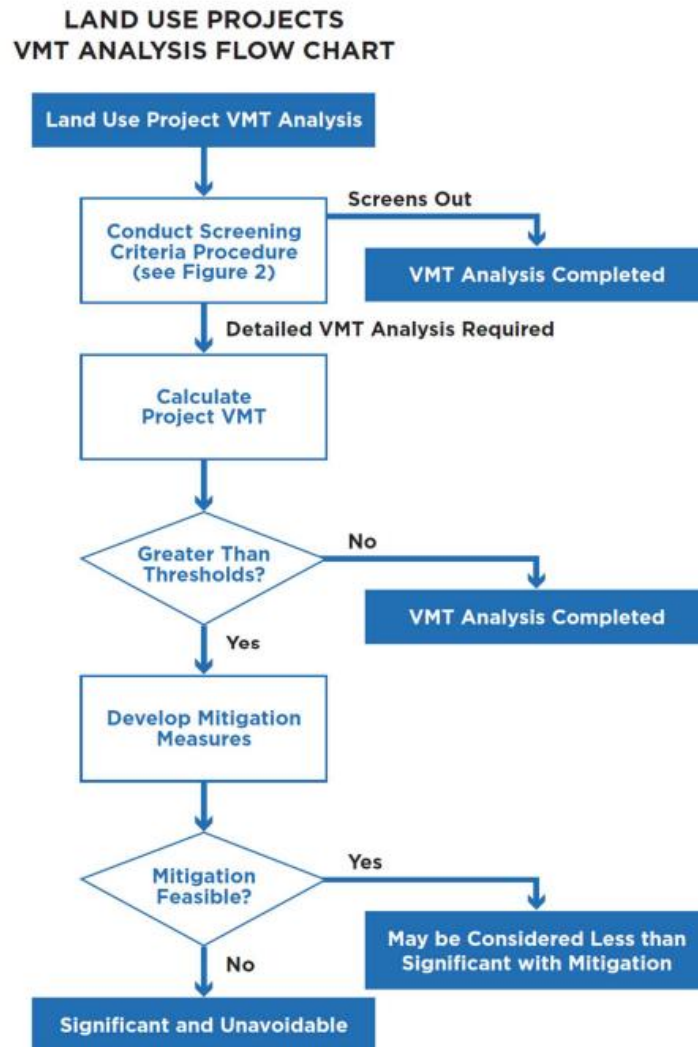
This section provides information for analyzing individual land use projects, including the process to aid in deciding if a detailed VMT analysis is needed for a land use project. Figure 2.1.1-A presents a flow chart depicting how a land use project would be analyzed under VMT-based metrics.

2.1.1. Project Screening

A project will require a detailed VMT analysis unless it meets at least one of the City's five screening criteria:

1. Small projects
2. Provision of affordable housing
3. Local-serving retail
4. Project located in a High-Quality Transit Area (HQTA)
5. Project located in low VMT area

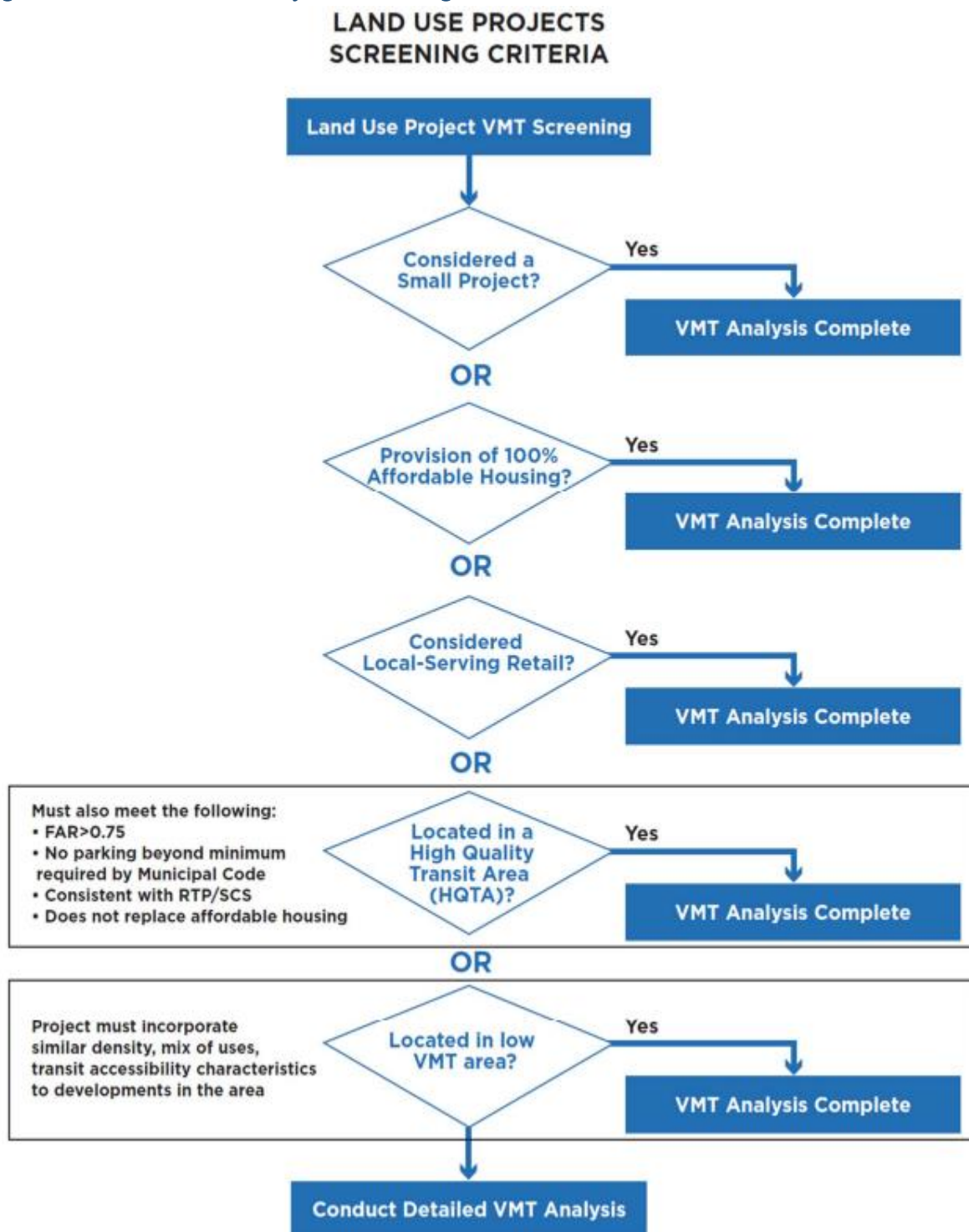
Figure 2.1.1 - A: Land Use Projects VMT Analysis



If a project’s VMT is significant and unavoidable, then an Environmental Impact Report must be prepared with a statement of over-riding findings.

Figure 2.1.1-B presents a chart depicting how a land use project would be analyzed under the proposed screening criteria. A project that meets at least one of the screening criteria could have a less-than-significant VMT impact due to project or location characteristics.

Figure 2.1.1.- B: Land Use Projects Screening Criteria Flow Chart



2.1.1.1. Small Projects

For the City of Manteca, projects consistent with the City’s General Plan can be screened if the project would generate fewer than 1,000 average daily trips (ADT), and projects not consistent with the City’s General Plan can be screened if the project would generate fewer than 500 ADT.

The State OPR Guidelines recommend a volume of 110 ADT. This recommendation is not based on any analysis of GHG reduction but, rather, on a CEQA categorical exemption. This exemption criterion states that for existing facilities, including additions to existing structures of up to 10,000 sf, the project is exempted from CEQA as long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not located in an environmentally sensitive area (State CEQA Guidelines Section 15301, subdivision (e)(2)).

As stated in the OPR Guidelines, for projects that have a linear increase in trip generation with respect to the building footprint, the daily trip generation is anticipated to be between 110 and 124 trips per 10,000 sf. Therefore, based on this assumption, the OPR recommends 110 ADT as the screening threshold. However, the California Emissions Estimator Model (CalEEMod) was used to characterize the effect of changes in project-related ADT to the resulting GHG emissions. This model was selected because it is provided by the California Air Resources Board (CARB) to be used statewide for developing project-level GHG emissions. CalEEMod was used with the built-in default trip lengths and types to show the vehicular GHG emissions from incremental amounts of ADT. Table A shows the resulting annual VMT and GHG emissions from the incremental ADT.

Average Daily Trips (ADT)	Annual Vehicle Miles Traveled (VMT)	GHG Emissions (Metric Tons CO ₂ e per year)
200	683,430	258
300	1,021,812	386
400	1,386,416	514
500	1,703,020	643
600	2,043,623	771
750	2,562,862	967
1,000	3,417,150	1,290
1,500	5,125,725	1,935

Source: CalEEMod version 2016.3.2.

CalEEMod = California Emissions Estimator Model
CO₂e = carbon dioxide equivalent

GHG = Greenhouse Gas

A common GHG emissions threshold is 3,000 metric tons (MT) of carbon dioxide equivalent (CO₂e) per year. The vehicle emissions are typically more than 50 percent of the total project GHG emissions. Thus, a project with 1,000 ADT would generally have total project emissions that could be less than 2,600 MT CO₂e/year (i.e., 50 percent or 1,290 MT CO₂e/year coming from vehicle emissions and the other 50 percent coming from other project activities). As this level of GHG emissions would be less than 3,000 MT CO₂e/year, the emissions of GHG from a project up to 1,000 ADT would typically be less than significant. The City of Manteca’s Implementation Guidelines document recommends that a more conservative daily trip threshold be applied to projects that are not consistent with the City’s General Plan. This is because a project that is not consistent with the General Plan may also conflict with the RTP/SCS. Therefore, for projects that are consistent with the City’s General Plan, the City will allow screening of these projects if they would generate fewer than 1,000 ADT. For projects that are not consistent with the City’s General Plan, a screening threshold of 500 ADT will be applied.

2.1.1.2. Affordable Housing

Affordable housing is designated as housing for sale or for rent below market rate. Residential projects in high quality transit areas with a high proportion of affordable housing are presumed to have a less-than-significant transportation impact. Projects can only be screened out if they are located in an area supported by a quality walking and biking network with nearby retail and employment opportunities. If a project contains less than 100 percent affordable housing, the portion that is affordable should be screened out of a detailed VMT analysis.

2.1.1.3. Local-Serving Retail

Retail shopping centers 125,000 square feet or less are exempt from further VMT analysis. The OPR Technical Advisory page 16-17 states that, "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. 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-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,"

The City of Manteca does not have definitions for local and regional serving retail. In absence of these definitions the City defers definition of such to the International Council of Shopping Centers (ICSC). In the ICSC U.S. Shopping Center Classification and Characteristics, the ICSC defines five (5) types of general purpose retail shopping centers.

- Strip/Convenience Centers -- Open-air centers under 30,000 square feet, typically anchored by a mini-market with a trade area size of less than 1 mile radius or less.
- Neighborhood Shopping Centers -- 30,000 to 125,000 square feet of gross leasable area, convenience oriented, typically anchored by a supermarket and/or large drugstore with a trade area of 3 miles or less.
- Community Shopping Centers (Large Neighborhood Centers) -- 125,000 to 400,000 square feet with general merchandise or convenience-oriented offerings that typically have a wider range of apparel and other soft goods offerings than neighborhood centers. The center is usually configured in a straight line as a strip, or may be laid out in an L or U shape, depending on the site and design. Typical tenants include Discount store, supermarket, drug, large-specialty discount (toys, books, electronics, home improvement/furnishings or sporting goods with a trade area of 3-6 miles.
- Regional Mall – 400,000 to 800,000 square feet with General merchandise or fashion-oriented offerings. Typically, enclosed with inward-facing stores connected by a common walkway. Parking surrounds the outside perimeter. Typical tenants include Full-line or junior department store, mass merchant, discount department store and/or fashion apparel store with a trade area of 5-15 miles

- Super-Regional Mall – 800,000+ square feet similar in concept to regional malls, but offering more variety and assortment. Typical tenants include full-line or junior department store, mass merchant, discount department store and/or fashion apparel stores with a trade area of 5-25 miles.

The 50,000 square foot limitation suggested by OPR falls within the range of a neighborhood center as defined by the ICSC. By having a trade area of 3 miles or less, the ICSC neighborhood center definition with a limit of 125,000 square feet gross floor area or less, is considered a local serving retail center.

Such a center could reduce VMT by design by placing special emphasis with the City of Manteca's Community Design goal to "Establish a pedestrian and bicycle friendly environment in neighborhoods and commercial and office land use areas." Special emphasis and attention to Community Design Element policies CD-P-37 through CD-P-43 will ensure that neighborhood centers will meet the City's VMT reduction goals. These policies are:

CD-P-37: Commercial centers should provide for convenient, attractive pedestrian access from street fronts and from adjacent commercial, office, and residential land uses.

CD-P-38: Commercial centers should provide for convenient, attractive pedestrian access within the center with dedicated pedestrian ways between all buildings and pedestrian spaces such as plazas, courtyards, and terraces at natural gathering areas within the site.

CD-P-39: Integrating the pedestrian elements (walkways, plazas, and terraces) with the buildings will enhance the pedestrian experience. The pedestrian relationship to buildings should be comfortable, convenient, and protected from extremes of sun and wind.

CD-P-40: Outdoor plazas or other common areas that provide space for special landscaping, public art, food service, outdoor retail sales, or seating areas for patrons are encouraged in retail settings appropriate to such pedestrian activity. The plaza or other common area shall be appropriately scaled to the retail use and shall be directly connected to the primary walkway.

CD-P-41: Buildings adjoining public spaces, including pedestrian ways shall be designed to allow the sun to reach sidewalks and plazas in the winter.

CD-P-42: Building configurations that provide "outdoor rooms," courtyards, paseos, and promenades are encouraged.

CD-P-43: Where practical, and in compliance with ADA standards, common areas that provide seating should be separated from the primary walkway by informal barriers, such as planters, bollards, fountains, low fences and/or changes in elevation.

Pursuant to Manteca Municipal Code Section 17.10.060 a Site Plan and Design Review land use entitlement is required for new or modified commercial centers. To screen a project from further VMT analysis, Site Plan and Design Review applications centers up to 125,000 square feet will be reviewed to ensure that acceptable design solutions that comply with above general plan policies are incorporated into the center design to the satisfaction of the Development Services Director or designee. The intent of doing so is to ensure that local serving centers provide a fine grain of detail needed to promote active transportation that will shorten trips and reduce VMT. The photographs below are examples of these policies implemented within commercial settings.

In accordance with the OPR Technical Advisory local serving retail centers up to 125,000 square feet that provide the fine grain details that promote active transportation are expected to have a less-than-significant impact on VMT and are exempt from further VMT analysis. This applies to the entirety of a retail project; for a mixed-use project, this screening criteria should be applied to the retail/commercial component separately to determine if that portion of the project screens out of a detailed VMT analysis.

The City may require that a project applicant provide a market analysis to demonstrate that the project meets the characteristics of a local-serving retail development based on the goods and services provided relative to the geographic location, the customer base, and other nearby retail uses. In making a determination the City will compare the market analysis to the characteristics of the ICSC U.S. Shopping-Center Classification and Characteristics table found on the next page.

Figure 2.1.1.3. Local-Serving Retail Community Design Element CD-P-37 through CD-P-43:



Table 2.1.1.3 ICSC Shopping Center Characteristics:

Type of Shopping Center		Concept	Center Count	Aggregate GLA (Sq. Ft.)	% Share of Industry GLA	Average Size Range (Sq. Ft.)	Typical GLA (Sq. Ft.)	Acres	# of Anchors	% Anchor GLA	Typical Number of Tenants	Typical Type of Anchors	Trade Area Size
General-Purpose Centers			112,520										
Super-Regional Mall		Similar in concept to regional malls, but offering more variety and assortment.	620	776,336,548	10.2%	1,255,382	800,000+	60-120	3+	50-70%	NA	Full-line or junior department store, mass merchant, discount department store and/or fashion apparel store.	5-25 miles
Regional Mall		General merchandise or fashion-oriented offerings. Typically, enclosed with inward-facing stores connected by a common walkway. Parking surrounds the outside perimeter.	600	353,795,548	4.7%	589,659	400,000-800,000	40-100	2+	50-70%	40-80 stores	Full-line or junior department store, mass merchant, discount department store and/or fashion apparel store.	5-15 miles
Community Center ("Large Neighborhood Center")		General merchandise or convenience-oriented offerings. Wider range of apparel and other soft goods offerings than neighborhood centers. The center is usually configured in a straight line as a strip, or may be laid out in an L or U shape, depending on the site and design.	9,776	1,930,849,736	25.4%	197,509	125,000-400,000	10-40	2+	40-60%	15-40 stores	Discount store, supermarket, drug, large-specialty discount (toys, books, electronics, home improvement/furnishings or sporting goods, etc.)	3-6 miles
Neighborhood Center		Convenience oriented.	32,588	2,340,711,371	30.8%	71,827	30,000-125,000	3-5	1+	30-50%	5-20 stores	Supermarket	3 miles
Strip/Convenience		Attached row of stores or service outlets managed as a coherent retail entity, with on-site parking usually located in front of the stores. Open canopies may connect the store fronts, but a strip center does not have enclosed walkways linking the stores. A strip center may be configured in a straight line, or have an "L" or "U" shape. A convenience center is among the smallest of the centers, whose tenants provide a narrow mix of goods and personal services to a very limited trade area.	68,936	911,202,922	12.0%	13,218	<30,000	<3	Anchor-less or a small convenience-store anchor.	NA	NA	Convenience store, such as a mini-mart.	<1 mile
Specialized-Purpose Centers			3,275										
Power Center		Category-dominant anchors, including discount department stores, off-price stores, wholesale clubs, with only a few small tenants.	2,258	990,416,667	13.0%	438,626	250,000-600,000	25-80	3+	70-90%	NA	Category killers, such as home improvement, discount department, warehouse club and off-price stores	5-10 miles
Lifestyle		Upscale national-chain specialty stores with dining and entertainment in an outdoor setting.	491	164,903,247	2.2%	335,852	150,000-500,000	10-40	0-2	0-50%	NA	Large format upscale specialty	8-12 miles
Factory Outlet		Manufacturers' and retailers' outlet stores selling brand-name goods at a discount.	367	87,368,113	1.2%	238,060	50,000-400,000	10-50	NA	NA	NA	Manufacturers' and retailers' outlets	25-75 miles
Theme/festival		Leisure, tourist, retail and service-oriented offerings with entertainment as a unifying theme. Often located in urban areas, they may be adapted from older-sometimes historic-buildings and can be part of a mixed-use project.	159	23,498,769	0.3%	147,791	80,000-250,000	5-20	unspecified	NA	NA	Restaurants, entertainment	25-75 miles
Limited-Purpose Property			62										
Airport Retail		Consolidation of retail stores located within a commercial airport	62	15,452,860	0.2%	249,240	75,000-300,000	NA	NA	NA	NA	No anchors; retail includes specialty retail and restaurants	NA
Total Industry			115,857	7,596,535,781	100.0%	65,568							
Traditional + Specialty + Special Purpose			115,857	7,596,535,781	100.0%	65,568							

Sources: ICSC Research and Costar Realty Information, Inc. (www.costar.com)

January 2017

2.1.1.4. Public/Quasi Public Land Uses

The development of Public/Quasi-Public (PQP) land uses that support community health, safety and welfare may also be screened from subsequent CEQA VMT analysis. PQP uses (e.g., hospitals, police, fire stations, community centers, refuse stations, public utilities, neighborhood parks) do not generally generate substantial amounts of trips and VMT. Instead, these land uses are often built to support other nearby land uses (e.g., office and residential). PQP facilities are already part of the community and, as a public service, the VMT is accounted for in the existing regional average. Many of these facilities generate fewer than 1,000 ADT and/or use vehicles other than passenger-cars or light duty trucks. These other vehicle fleets are subject to regulation outside of CEQA, such as the CARB and the San Joaquin Valley Air Pollution Control District. Therefore, PQP land uses can be presumed to have less-than-significant impacts on VMT. However, this presumption would not apply if the project is sited in a location that requires employees or visitors to travel substantial distances and may require a detailed VMT analysis

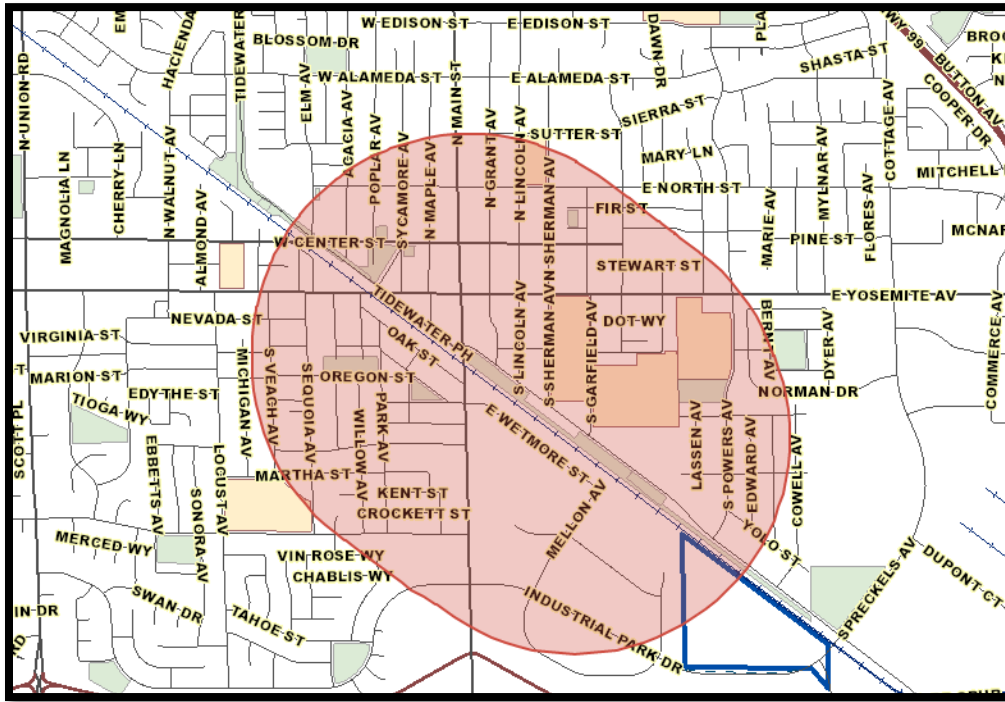
2.1.1.5. High-Quality Transit Area (HQTA)

Projects that are within 0.5 mile of the City's Downtown Transit Center or the Altamont Commuter Express (ACE) Manteca/Lathrop station are exempt from further VMT CEQA analysis. In accordance with SB 743, "Transit priority areas" are defined as "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program. Public Resource Code Section 21064.3(a) further defines a Major Transit Stop as: "a site containing an **existing rail transit station**, ..." The Downtown Transit will be serviced by ACE starting in 2024 and ACE is currently providing services to the Manteca/Lathrop Station. A project located within one-half mile of either station are considered to do not require a detailed VMT analysis. However, this presumption does not apply if the project:

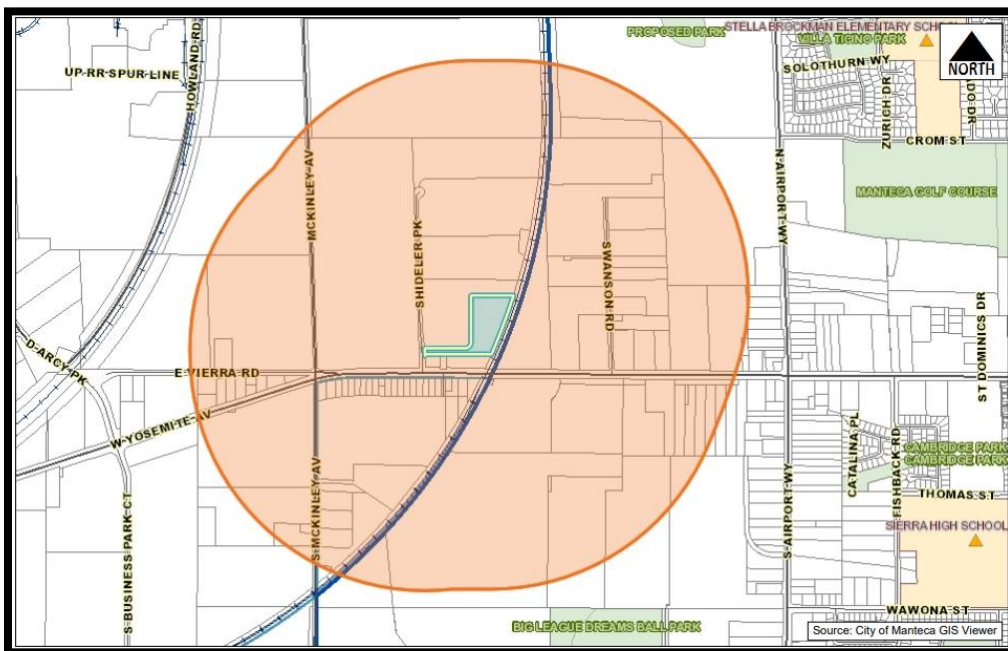
- has a floor area ratio (FAR) of less than 0.75;
- includes substantially more parking for use by residents, customers, or employees of the project than required by the City (per Section 17.52.050 of the Municipal Code) such that it discourages use of alternative modes (transit, biking, walking) by promoting auto ownership and making driving very convenient;
- is inconsistent with the applicable San Joaquin Council of Governments (San Joaquin COG) Sustainable Communities Strategy (SCS), as determined by the City; or
- replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The City of Manteca's Transit Center and the existing ACE station and their respective surrounding areas are considered High-Quality Transit Areas. Projects will be required to provide a continuous sidewalk meeting ADA requirements from the project site to the nearest rail station. Below are maps that depict the High-Quality Transit Areas within the City. Detailed maps showing one-half-mile areas surrounding the transit center and ACE Station are shown on Maps "A" and "B" respectively.

Map 2.1.1.5 .A -- Transit Center High-Quality Transit Area



Map 2.1.1.5 -- B ACE Station High-Quality Transit Area



2.1.1.6. Project Located in Low VMT Areas

Residential and employment projects that are proposed in areas that generate VMT below adopted City thresholds are presumed to have a less-than-significant VMT impact and thus can be screened out. The City provides screening maps based on transportation analysis zones (TAZs) and results from the San Joaquin COG travel model. The following types of projects may be screened out of detailed VMT analysis using these criteria:

- Residential projects proposed in TAZs with total daily resident-based VMT per capita that is 13 percent less than the existing average baseline level for San Joaquin County.
- Office or the employment portions of other non-residential uses with total daily employee-based VMT per employee that is 15 percent less than the existing average baseline level for San Joaquin County

Currently, there are no TAZs that fall into either categories within Manteca. As the City grows in accordance with the adopted General Plan, development in Low VMT Areas may occur.


2.1.1.7. Consistency with adopted General Plan and San Joaquin RTP/SCS





If a proposed project is inconsistent with the adopted City of Manteca General Plan or the SJCOG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the City will evaluate whether that inconsistency may result in a significant impact on transportation. Therefore, projects that are inconsistent with either the City’s General Plan or SJCOG RTP/SCS would not qualify for screening out of a detailed VMT analysis.

2.1.2. Significant Impact Thresholds

For projects which do not meet any of the screening criteria, the City of Manteca has adopted VMT thresholds for land use development based on a review of long-range plans and policies for the City and for the metropolitan planning organization for the region, SJCOG, has set a goal to reduce greenhouse gas (GHG) emissions by 15 percent per capita by 2035 as a target for the San Joaquin region.

The intent of SB 743 is to bring CEQA transportation analyses into closer alignment with other statewide policies regarding GHG, complete streets, and smart growth. Therefore, using a threshold of 15 percent below average VMT for residential and office projects is consistent with established regional GHG emission goals.

<p>Total VMT</p>	<p>All vehicle-trips (i.e., passenger and commercial vehicles) or passenger-only vehicle-trips are assigned on the network within a specific geographic boundary (i.e., model-wide, region-wide, city-wide). Vehicle volume on each link is multiplied by link distance.</p>	
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<p>Total VMT generated by a project</p>	<p>All vehicle-trips are traced to the zone or zones of study. This includes internal to internal (II), internal to external (IX), and external to internal (XI) trips. May use final assignment origin-destination (OD) trip tables or production (P) and attraction (A) estimates multiplied by distance skims.</p>	
<p>Total VMT per service population</p>	<p>Same method as above (Total VMT generated by a project) to estimate VMT and then divide by the population and employment of the zone or zones of study.</p>	
<p>Home-based VMT per resident</p>	<p>All automobile (i.e., passenger cars and light-duty trucks) vehicle-trips that start or end at the home are traced, but non-home-based trips made by residents elsewhere on the network are excluded.</p>	
<p>Home-based work VMT per employee</p>	<p>All automobile trips between home and work are traced.</p>	

Based on Appendix G of the CEQA Guidelines, the General Plan would result in a significant transportation impact if it would conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)(1), which states for land use projects, “Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.” CEQA Guidelines § 15064.3, subdivision (b)(4) states, “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.”

The City has selected to measure VMT by land use type:

- VMT per single-family dwelling unit
- VMT per multi-family dwelling unit
- VMT per age-restricted dwelling unit
- VMT per office employee
- VMT per industrial employee
- VMT per retail employee
- VMT per restaurant employee

The 14.3 percent reduction in total VMT per capita identified as necessary to meet State goals in the ARB 2017 “Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals” is supported by substantial evidence. Additionally, this document updated data used to develop the OPR “Technical Advisory.” The “Technical Advisory” supports “per rate” reductions of 15 percent compared to existing conditions (page 10). The “Technical Advisory” has been endorsed by Caltrans in their TISG.

With these considerations, the City has selected a threshold of 15 percent below City-wide baseline VMT per dwelling unit (for residential land uses) or employee (employment-related land uses) by land use type. Therefore, if any of the VMT metrics listed in the table below, exceed the “85 Percent of Baseline” of VMT, VMT impacts may be considered significant. VMT thresholds by land use type are shown in the table below, Table 2.1.3-1.

Table 2.1.3 –1 City VMT Threshold of Significance

<i>LAND USE</i>	<i>UNITS</i>	<i>2019 BASELINE</i>	<i>85 PERCENT OF BASELINE</i>
Single family	VMT per dwelling unit	103.8	88.2
Multi family	VMT per dwelling unit	78.6	66.8
Age restricted	VMT per dwelling unit	44.1	88.2
Restaurant	VMT per employee	186.0	158.1
Industrial	VMT per employee	75.3	64.0
Office	VMT per employee	32.4	27.5
Retail	VMT per employee	118.9	101.1

*NOTE: VMT PER EMPLOYEE RATIOS INCLUDE ALL TRIPS BY EMPLOYEES, CUSTOMERS, AND DELIVERIES.
SOURCE: FEHR & PEERS, 2020*

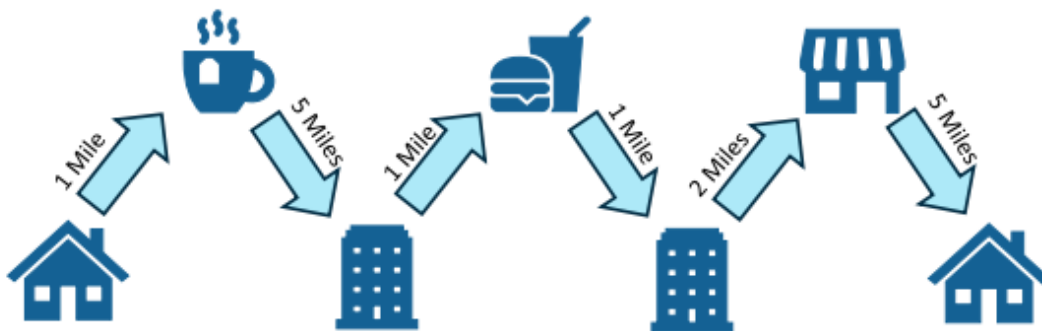
2.1.3. VMT Analysis Methodology

Projects that do not meet the screening criteria must include a detailed evaluation of the VMT generated by the project.

2.1.3.1. Regional Average VMT

Regional average VMT per capita and VMT per employee values are determined using the SJCOG regional travel model. The travel demand model is a set of mathematical procedures and equations that represent the variety of transportation choices that people make, and how those choices result in trips on the transportation network. The San Joaquin COG developed in partnership with Stanislaus and Merced COG's a regional travel model that is a standard four-step (non-activity based) model that simulates the County's population, based on detailed Census data, and models the daily activity patterns of each simulated individual along with resulting travel demand. Vehicle miles traveled (VMT) refers to the distance a vehicle travels from each origin to destination. The following graphic demonstrates how VMT is derived.

Example of a total of 15 vehicle miles traveled.



The OPR guidelines recommend using a tour-based approach whenever possible. The daily activity patterns in the travel model are based on a statistical analysis of a household travel survey, where a representative sample of households were asked to track all daily activities and trips by all members of their household. A simulated travel tour might consist of, for example, travel from the home to the gym to work to supermarket to home in a typical weekday. The travel model was calibrated to these surveyed travel patterns, and also validated by its ability to replicate counted traffic volumes, transit ridership, and total San Joaquin County VMT from the Highway Performance Measurement System (HPMS) which is based on traffic counts.

The VMT per capita includes all trips made by residents, including their trips while away from home, but does not include trips visiting residences (e.g., trips made by delivery vans). The regional average VMT per capita is calculated by summing the vehicle mileage (excluding trips made by transit, bicycle or walking) for all trips made by San Joaquin County residents, and dividing by the county population.

The VMT per employee includes trips made by employees to and from their workplaces, including trips to and from points other than the employees' homes, but does not include visitors to the employment sites. The regional average VMT per employee is calculated by summing the vehicle mileage (excluding trips made by transit, bicycle or walking) for all trips made by employees within San Joaquin County, and dividing by the total number of employees in the county.

2.1.3.2.VMT per Capita or per Employee

Like most models, the Manteca travel demand model does not explicitly capture the abovementioned new modes of travel and emerging trends in travel behavior. Significant uncertainties exist at the present time that prevent explicit modeling of these new modes and emerging trends for the analysis of the General Plan Update. However, since VMT is a “relative efficiency” metric, to the extent that these trends could cause systematic changes across the City and beyond, the trends effectively cancel each other out when comparing VMT efficiency for a given horizon period. Two measures of VMT are used in this analysis:

- VMT per dwelling unit, for residential land uses. Includes VMT for trips produced by a dwelling unit’s residents, such as to work, school, or shop, and with one end of the trip at the home, on a typical weekday.
- VMT per employee, for non-residential land uses. Includes all trips with one end at the land use, including employees, customers, and deliveries, on a typical weekday. (Note that this ratio is different than the VMT generated by each employee, as the latter only includes trips made by employees).

VMT per dwelling unit is used because the model uses dwelling units as an input. VMT per resident estimates can be made based on estimates of residents per household.

VMT estimates for the 2019 baseline and the 2016 modelled conditions are shown in the table below. In addition to the two metrics presented above, additional metrics are reported for information. With respect to the residential uses, it is reasonable to expect that multi-family would generate about three-quarters of the VMT as single-family, as the ratio of their daily trip generation rates is in that range. Additionally, socioeconomic characteristics likely play a role, with single-family units having a propensity for longer distance commute trips.

Table 2.1.3.2 VMT per Dwelling Unit, per Capita and per Employee

<i>LAND USE</i>	<i>UNITS</i>	<i>2019 BASELINE</i>	<i>2016 EXISTING CONDITIONS</i>
Single family residential	VMT per dwelling unit	103.8	97.6
Multi-family residential	VMT per dwelling unit	78.6	74.3
Age restricted residential	VMT per dwelling unit	44.1	41.8
Restaurant	VMT per employee ¹	186.0	186.1
Industrial	VMT per employee	75.3	76.2
Office	VMT per employee	32.4	32.3
Retail	VMT per employee	118.9	119.4
All residential	VMT per dwelling unit	94.8	89.4
All residential	VMT per resident ²	29.8	28.1
All employment	VMT per employee	82.2	82.5
All land uses	VMT per service population ^{2,3}	36.7	36.7
Total VMT	VMT	3,755,100	3,337,400

NOTES: ¹VMT PER EMPLOYEE RATIOS INCLUDE ALL TRIPS BY EMPLOYEES, CUSTOMERS, AND DELIVERIES
²BASED ON 3.18 RESIDENTS/DWELLING UNIT (CALIFORNIA DEPARTMENT OF FINANCE, E-5 CITY/COUNTY POPULATION AND HOUSING ESTIMATES, 1/1/2020)
³SERVICE POPULATION INCLUDES RESIDENTS AND EMPLOYEES
⁴VMT INCLUDES FULL LENGTH OF ALL TRIPS WITH EITHER AN ORIGIN OR DESTINATION WITHIN THE PLANNING AREA.

SOURCE: FEHR & PEERS, 2020

Regarding the non-residential uses, the most common use types are shown including retail, office, industrial, and restaurants. Although schools, churches, parks, etc. are also present within Manteca, proposals for new construction are relatively rare and should be evaluated on a case-by-case basis and potentially screened as a Public/Quasi-Public use as described above. The VMT per employee does not necessarily reflect the actual amount of travel by each employee but is rather a ratio of that land use’s total amount of travel (by all users) divided by employees.

<i>LAND USE</i>	<i>UNITS</i>	<i>THRESHOLD</i>	<i>PROPOSED GENERAL PLAN¹</i>	<i>REDUCTION NEEDED TO ACHIEVE THRESHOLD</i>
Single family	VMT per dwelling unit	88.2	75.4	-
Multi family	VMT per dwelling unit	66.8	57.2	-
Age restricted	VMT per dwelling unit	37.5	28.4	-
Restaurant	VMT per employee	158.1	228.6	31%
Industrial	VMT per employee	64.0	74.9	15%
Office	VMT per employee	27.5	43.1	36%
Retail	VMT per employee	101.1	211.5	52%

NOTES: ¹**BOLD = EXCEEDS THRESHOLD**
²VMT PER EMPLOYEE RATIOS INCLUDE ALL TRIPS BY EMPLOYEES, CUSTOMERS, AND DELIVERIES.

SOURCE: FEHR & PEERS, 2020

2.1.3.3. Exclusion of Truck VMT

It shall be noted that SB 743 does not apply to goods movement (i.e., trucks). Section 15064.3 of the CEQA Guidelines states that VMT for transportation impacts refers to “... the amount and distance of

automobile travel...”. Therefore, the VMT associated with trucks and the movement of goods is not required to be analyzed and mitigated for the evaluation of transportation impacts under CEQA.

Projects that generate a substantial amount of truck traffic also generate automobile trips, and project-related automobile trips would be subject to VMT analysis and mitigation. The VMT for all vehicles, including heavy trucks related to a project, will still be calculated as input for air quality, GHG, noise and energy impact analyses to be evaluated in non-transportation parts of the environmental analysis. The local transportation analysis (LTS or LTA) requires an evaluation of truck traffic in terms of roadway and intersection operations, as discussed in Section 1.1.4 and 1.1.5.

2.1.4 Adaptive Reuse and Redevelopment Projects

If a project results in a net decrease in overall VMT, it may be presumed that the project would result in a less-than-significant impact.

If a project replaces existing uses and leads to a net overall increase in VMT compared to the previous uses, then the thresholds for the new land uses should apply. If net VMT increases, then the appropriate VMT metrics and thresholds should be applied. For example, if a residential project replaces an office project resulting in a net increase in VMT, then the project’s VMT per capita should be compared with the thresholds for residential projects. If the project is a mixed-use project, then the recommended approach for analyzing mixed-use projects should be applied to analyze each individual use.

2.1.5. Land Use Plans

For land use plans such as specific plans, community plans, and general plan updates, consistent with OPR’s recommendations, the City requires comparing the applicable VMT thresholds (such as VMT per capita and/or VMT per employee) described in Section 2.1.3 with the 85 Percent of Baseline Conditions under the applicable VMT metrics for the expected horizon year for the land use plan. If there is a net increase in the applicable VMT metrics under horizon year conditions, then the project will have a significant impact.

2.1.6. Cumulative Impacts

Per Section 15064 (h) (3) of the CEQA Guidelines, the City “may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a ... approved plan or mitigation program (including, but not limited to, ... plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.” Build out of the area consistent with the adopted General Plan meets the required criteria that such plans be adopted by the City through a public review process. When relying on the General Plan, the City will evaluate and require analysis how a project’s contribution to the cumulative effect is not cumulatively considerable.

Due to the timing issues involved with development, it is foreseeable that under a project only scenario, a project may exceed threshold levels. As development occurs around the project, the project may assist the City in achieving cumulative VMT reduction goals. In these cases, the project is considered consistent with the City’s VMT reduction goals.

2.1.6.1. Projects below 85% Baseline Threshold

For land uses evaluated under an efficiency metric (VMT per capita for residential or VMT per employee for office/employment), if a project falls below 85% of Baseline threshold, it would also result in less-than-significant cumulative impacts. In other words, a project that falls below the 85 Percent of Baseline efficiency-based threshold would have no cumulative impact distinct from the project impact.

2.1.6.2. Total VMT

For land uses evaluated using total VMT (e.g., retail, hotels, etc.), when absolute VMT metrics (such as total VMT recommended for retail and transportation projects) are used, a cumulative VMT impact analysis may be appropriate. Projects must demonstrate consistency with the City of Manteca General Plan to address cumulative impacts. A determination for consistency with the General Plan or RTP/SCS would be made by the Development Services Director and based on factors such as density, design and consistency with the City's General Plan goals and policies. Inconsistencies may be identified if the proposed land use quantities are beyond the designation for the project site in the General Plan or RTP/SCS, in which case the project may result in higher VMT compared to the applicable plan.

If a project is consistent with the General Plan or RTP/SCS, it will be considered as part of the cumulative condition to meet the General Plan's long-range transportation goals, and therefore will result in a less-than-significant cumulative impact. If a project is not consistent with the General Plan, a cumulative impact analysis will be required to determine if the project would result in a net increase in VMT.

2.1.7. Mitigation

If a project would result in significant impacts, CEQA requires feasible mitigation measures to be implemented to reduce or mitigate an impact. Mitigation includes:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action
- (e) Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

For VMT impacts, a combination of measures from several VMT reduction strategies may be implemented: project characteristics, multimodal improvements, parking, and Transportation Demand Management (TDM). VMT is reduced by implementing strategies that reduce the number of automobile trips generated by the project, shift more trips from automobile to non-automobile modes, and/or reduce the distances that people drive. Generally, these reductions can be achieved by the implementation of TDM strategies.

TDM strategies are designed to change travel behavior in order to reduce the demand for roadway travel and increase the overall efficiency of a local or regional transportation system. This is accomplished by encouraging mode shifts away from the Single Occupant Vehicle (SOV) and auto trips away from peak periods. TDM strategies typically involve some form of incentives for employers and residents in order to reduce driving and encourage transit, walking, biking, and carpooling. These incentives can include, but are not limited to, supplying transit passes, rideshare programs, parking cash

out, and guaranteed ride home programs. The implementation of TDM measures outcomes include increased transit use and non-motorized travel, reduced VMT, reduced roadway congestion, and reduced parking demand.

Measures to reduce VMT have been documented by several sources. Sources most commonly referenced include the California Air Resources Board (CARB) list of transportation and land use strategies for reducing greenhouse gas emissions; the California Air Pollution Control Officers Association (CAPCOA) report on quantifying the greenhouse gas mitigation measures; and the San Diego Association of Governments (SANDAG) Mobility Management VMT Reduction Calculator Tool – Design Document. The City recommends the use of these sources to select and apply mitigation measures and appropriate VMT reductions. The project applicant will be required to provide evidence for identifying specific values for mitigations to demonstrate the quantification in reduction of VMT to a level that would be less than significant.

Projects for which impacts are determined to be significant are required to propose a list of VMT reduction measures and document the associated percentage of VMT reduction supported by substantial evidence. Project VMT is calculated by applying the percentage in reduction. Project VMT is then compared to the threshold of significance to evaluate the project's CEQA transportation impact. The City will review and approve the proposed mitigation and the calculated percentage in VMT reduction.

3. TRANSPORTATION PROJECTS

This section provides information for analyzing transportation projects on roads within the City's jurisdiction.

3.1. Determining Need for Detailed VMT Analysis

The City of Manteca requires an analysis of transportation projects if they are expected to increase VMT, primarily projects that encourage the use of single-occupancy automobile such as the addition of through travel lanes. However, transportation projects that have already been specifically analyzed in a citywide plan (such as a General Plan update) may be exempt from a detailed VMT analysis. This exemption may be granted if the necessary VMT analysis and potential mitigations have already been calculated and identified at the plan level.

Conversely, projects that would likely not lead to an increase in vehicle travel and which promote use of transit and active transportation, should not require a VMT analysis. There are 26 broad project types that would likely not lead to a substantial or measurable increase in vehicle travel and generally should not require a VMT analysis include:

1. 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
2. Roadside safety devices or hardware installation such as median barriers and guardrails
3. 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
4. Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety
5. 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
6. Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
7. 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
8. Addition of a new lane that is permanently restricted to use only by transit vehicles
9. Reduction in number of through lanes
10. 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
11. Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
12. Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
13. Timing of signals to optimize vehicle, bicycle, or pedestrian flow
14. Installation of roundabouts or traffic circles

15. Installation or reconfiguration of traffic calming devices
16. Adoption of or increase in tolls
17. Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase
18. Initiation of new transit service
19. Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
20. Removal or relocation of off-street or on-street parking spaces
21. Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
22. Addition of traffic wayfinding signage
23. Rehabilitation and maintenance projects that do not add motor vehicle capacity
24. Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
25. Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel
26. Installation of publicly available alternative fuel/charging infrastructure

The screening out of the above 26 transportation project types from further VMT analysis is consistent with the intent of SB 743 in that it streamlines VMT-reducing projects and thoroughly assesses and mitigates, as appropriate, projects that have the potential to increase VMT.

3.2. Thresholds for Transportation Projects

Projects that have already been included and evaluated in the General Plan or the RTP/SCS are presumed to have a less-than-significant impact.

For projects that have not been included in the General Plan or RTP/SCS or are modifications and replacements, any growth in VMT attributable to the transportation project could result in a significant impact. For example, a transportation project that replaces a project included in the General Plan and would generate less VMT compared to the project included in the General Plan would have a less than significant impact. Projects not included in the General Plan or RTP/SCS would have a significant impact if they cause a net increase in VMT.

3.3. VMT Analysis Methodology and Tools

For transportation projects (e.g., those that increase vehicular throughput or are not included in a citywide plan) that require a detailed VMT analysis, the City should require analysis using the most current travel demand model (i.e., San Joaquin COG model) to estimate changes to citywide VMT due to rerouted trips. To capture long-term effects, an induced demand assessment using the following formula should be required:

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

The City requires total VMT in the city as the appropriate VMT metric, with the impact threshold being any increase in total VMT. The analysis shall be performed for the long-range horizon year, normally 20 years out. This approach would discourage induced demand impacts by requiring that a baseline level of VMT in the city not be exceeded.

3.4. Mitigation for Transportation Projects

Mitigation measures for transportation projects generally seek to reduce VMT by discouraging single passenger automobile travel or through funding TDM measures. The following potential mitigation measures for transportation projects are listed as examples for consideration:

- Tolling new lanes to encourage carpooling 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
- Construction of Park and Ride lots
- Ensure construction of complete streets to accommodate all modes of transportation

The City may pursue other mitigation measures supported by substantial evidence.