



CALIFORNIA ENVIRONMENTAL EQUALITY ACT (CEQA) TRANSPORTATION SECTION UPDATE FREQUENTLY ASKED QUESTIONS

August 26, 2019

Summary

The City of Santa Clara Department of Public Works and Community Development Department are updating the City's California Environmental Quality Act (CEQA) Transportation Analysis methodology and thresholds to comply with and implement Senate Bill (SB) 743 (Steinberg, 2013). In 2013, the State of California signed SB743 into law, which requires a shift in the way cities measure transportation environmental impacts. The Office of Planning and Research (OPR) is requiring all cities to measure transportation impacts with vehicle miles traveled (VMT) to determine the significance of transportation-related impacts under CEQA.

The City will also be bringing forward a new transportation policy that aligns with State law and further defines the City's requirements for transportation analysis. The new policy is anticipated to be heard by the City Council in May 2020.

To provide more information about this update to the City's Transportation Analysis methodology, this document was prepared to provide more information about the current requirements and the proposed updated requirements.

Frequently Asked Questions

1. What is CEQA?

The California Environmental Quality Act (CEQA) is a statute that requires State and local agencies to identify significant environmental impacts of their projects (actions) and to avoid or mitigate those impacts, if feasible.

2. What are the CEQA transportation requirements for the City of Santa Clara?

All cities are required to establish a standard for measuring traffic impacts of proposed developments. For decades, Level of Service (LOS) has been the industry standard used to measure transportation impacts.



3. What is Level of Service (LOS)?

Transportation Level of Service (LOS) is a measure of traffic delay at signalized intersections or roadway segments. Level of Service uses a letter-grade system ranging from LOS A, or free-flow conditions with little or no delay, to LOS F, or oversaturated conditions with excessive delays.

4. What is Vehicle Miles Traveled (VMT)?

Vehicle Miles Traveled (VMT) measures the distance a motorized vehicle will travel to a destination, divided by the number of passengers (i.e., per capita). Typically, development located farther from retail, office, and other uses and with poor access to transit, generates more driving than development situated close to complementary uses and transit. Cities use VMT to evaluate greenhouse gas emissions and some transportation impacts.

5. Why is the City changing its Transportation Impact policy?

In 2013, the State passed SB 743 (Steinberg), which required California cities to establish a new method of determining the significant impact criteria of transportation impacts of a project under CEQA. The Governor's Office of Planning and Research (OPR) recommended that VMT replace LOS as the primary measure of transportation impacts. The OPR guidance generally recommends that the threshold for residential and office projects be 15% below the existing per capita VMT.

In December 2018, after five years of outreach, the California Natural Resources Agency certified and adopted the CEQA Guidelines update. For more information on the comprehensive package, including the full regulatory text, please visit the [Natural Resources Agency's website](#).

6. Why did the State pass legislation to adopt this change?

SB 743 (Steinberg) states that "New methodologies under the California Environmental Quality Act are needed for evaluating transportation impacts that are better able to promote the State's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations."

7. What does this mean for the City of Santa Clara?

The City of Santa Clara 2010-2035 General Plan, which establishes a vision for the future of Santa Clara and includes all development policies for the City, establishes a framework of principles and standards, and guides future decisions for developing the City.



The City's General Plan provides a sequence for development as a mechanism to facilitate responsible growth that acknowledges that most areas of the city are not expected to change substantially over the course of the General Plan. Specifically, Santa Clara's established residential neighborhoods, with their distinctive character and sense of community, are not proposed for land use changes. The General Plan anticipates that virtually all new development will reuse existing, underutilized properties.

Although there are three defined development phases outlined in the General Plan, they all share similar goals within the three distinct time frames:

- Developing housing that are well-connected with existing residential neighborhoods, City services and public transit, parks, open space, and other public facilities.
- Intensifying employment centers near Caltrain corridor, Caltrain station and the Tasman light rail corridor.
- Support infrastructure improvements.
- Develop mixed-use residential and commercial development in specific areas.
- Establish new neighborhood-oriented retail uses and services along specific major transportation corridors.
- Continue to develop along other transit corridors such as Great America Parkway, Central Expressway and De La Cruz Blvd.

The General Plan vision for the future:

- Building mixed-use development with access to future transit
- Enhance walkability and bicycle circulation throughout the city of Santa Clara
- Reduce traffic congestion and promote expansion of the public transportation system
- Increase the employment base
- Provide neighborhood commercial centers
- Continue high quality public services and amenities, including open space and parks, and
- Encourage sustainability to protect energy, water supplies, and air qualities

By updating the City's transportation methodology to measure VMT rather than LOS, transportation analysis will align with and support the City's General Plan goals and policies by encouraging denser land uses along major transit corridors, thereby maximizing existing infrastructure and providing multiple transportation options while maintaining quality of life for residents.



8. What is the timeline for these changes?

In conformance with the 2018 CEQA guidelines, Section 15064.3 - Determining the Significance of Transportation Impacts, beginning on July 1, 2020, the provisions of this section shall apply statewide.

9. Does my ability to engage in land use and transportation decisions change?

No. The process for weighing in on land use changes and transportation projects will remain the same. Citizens will still be able to provide comments, speak at public hearings, and contact elected representatives on new development. The City Council still has the authority to make land use and transportation decisions.

10. How will the CEQA process change?

For certain types of transportation projects (e.g. bike lanes and sidewalk gap closures) and certain types of development projects in growth areas with access to transit, a transportation analysis under CEQA may not be required. This change to VMT only affects the transportation section under CEQA. Analysis of other CEQA subject areas such as biological and cultural resources, noise, and air quality remain the same.

11. How will this change impact the City's ability to ask developers for transportation investments?

Neighborhood traffic and mobility is very important to the City. Developers will still be required to improve operations to the transportation network and to address neighborhood traffic. In addition, any established Ordinance fees are still applicable.

12. Will the shift to VMT make it easier or harder to develop in my neighborhood?

Every development project is unique and will be evaluated according to its specific attributes and context. However, in general, the CEQA environmental review process could be streamlined if development is proposed in General Plan designated growth areas with good access to transit and a mix of uses (e.g. residential, office and retail). Developments in places where it is hard to get around without a car will likely have to mitigate the impacts of VMT.

13. Will the shift to VMT change the CEQA process?

The CEQA process will not change, but some projects currently not exempt from CEQA transportation analysis may be exempt from CEQA transportation analysis under VMT and vice versa.



14. How will the shift to VMT impact new development projects?

New development projects that are required to analyze VMT will still be required to have a traffic impact analysis. Generally, new development proposals will evaluate project impacts using new City transportation policies based on measuring and reducing VMT. Mixed-use developments in growth areas, located near transit, are more likely to meet VMT reduction thresholds. Proposed developments outside growth areas and transit corridors may need to provide mitigation to reduce VMT impacts. In addition to the CEQA VMT analysis, projects will continue to be required to analyze local intersection operations and other potential neighborhood impacts.

15. How will this change impact new transportation projects?

Transportation projects that inherently help reduce VMT such as bicycle lanes, transit facilities, and sidewalk improvements may no longer have to go through a CEQA analysis for transportation environmental impacts. These projects may still be subject to city analysis on overall transportation system and operations impacts. Transportation projects that may increase VMT would be required to analyze VMT impacts and potentially mitigate those impacts.

16. When will the change to VMT happen? How will projects already in the pipeline be treated?

The new Transportation Analysis Policy will be in effect 30 days after City Council approval. New development projects that submit complete development applications after that date must comply with the new Policy; before that date, projects that wish to also study VMT per the new Policy may do so with approval from the Director of Public Works.

17. If a new development proposes to include Transportation Demand Management (TDM) measures into a development, how will the City enforce these measures?

The City will require annual monitoring of the approved TDM measures and reporting to the City's environmental review section for approval. These requirements will be included in the planning permit.

20. How will this change impact housing?

Each development is unique and will be considered on an individual basis. Proposed high-density housing developments that are consistent with the General Plan and support transit use and are located in areas with high-quality transit and amenities may not have to analyze transportation impacts under CEQA, which may streamline the CEQA process.

22. Will this change impact the environment?

Level of service is a measure of how an intersection operates when projected project traffic is added to an intersection in the area proximate to the proposed development. VMT measures the amount of single occupancy travel (cars with solo drivers) would be generated by a



proposed development based on the project characteristics and location. Factors such as good quality transit, proximity to walkable, bikeable places are all contributing factors to reducing VMT. By establishing a VMT CEQA metric, projects will be required to reduce the amount of single occupancy vehicles the project will generate and should result in less project generated traffic and less emissions.

23. What are the impacts on business?

Nonresidential land uses that conform to the General Plan and that are in growth areas with high-quality transit may not have to analyze transportation impacts under CEQA, which may streamline the environmental review process. Furthermore, the VMT metric may facilitate more dense development.

24. How will this shift affect overall affordability?

The proposed Transportation Analysis Policy and shift to VMT is intended to streamline residential development overall, particularly affordable housing, infill housing, and homes in low-VMT areas. This streamlining should allow for greater supply and lower housing costs. Importantly, it will also lower transportation costs as new development is concentrated in areas with a variety of affordable transportation options. This is a key argument made by the state in support of the VMT policy.