



LOS Engineering, Inc.
Traffic and Transportation

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April 5, 2021

Mr. Ismail Elhamad
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101

Subject: All Peoples Church Vehicle Miles Traveled Analysis (PTS# 636444)

Dear Mr. Elhamad:

LOS Engineering, Inc. is pleased to present this Vehicle Miles Traveled (VMT) analysis for the All Peoples Church project. The project is generally located on the northeast corner of College Ave and Interstate 8 within the Navajo Planning Area in San Diego, California. The following discretionary approvals are required as part of the project:

- 1) Community Plan Amendment
- 2) Planned Development Permit
- 3) Site Development Permit
- 4) Vacation of Easements and Slope Rights

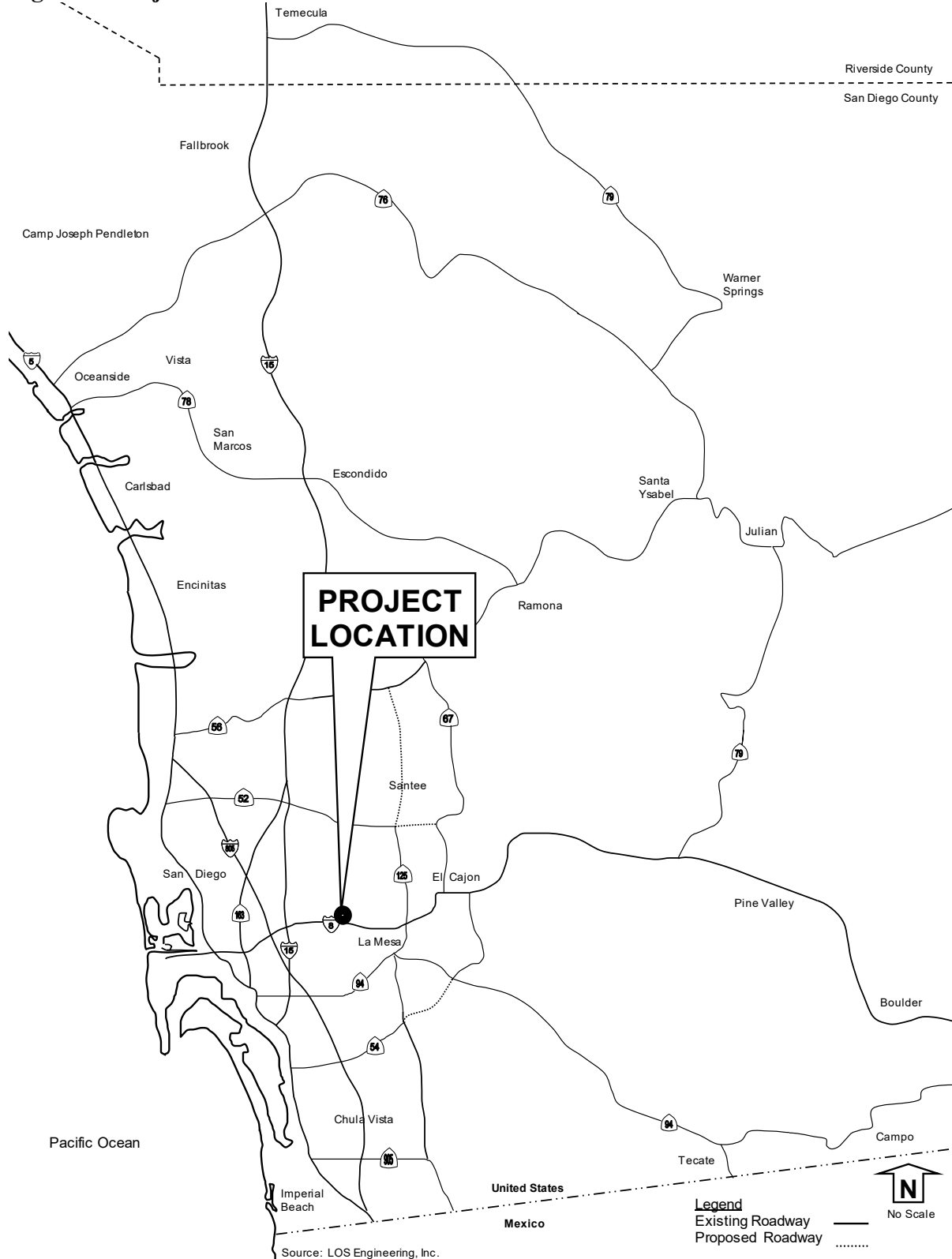
A Project Information Form (PIF) that includes the project location/context, site plan, project description, trip generation, and trip distribution is required by the City of San Diego to determine the types of analysis that will be required, including a Local Mobility Analysis (LMA) and/or a VMT based transportation analysis to evaluate transportation impacts under CEQA. The PIF is included as **Attachment A**.

PROJECT DESCRIPTION

All Peoples Church is proposed on the northeast corner of Interstate-8 and College Avenue with a sanctuary capacity of 900 seats (587 fixed seats and 3,690 s.f. of non-fixed seats). The site with residential zoning RS-1-7 on approximately 6 acres is vacant. The project site currently has no vehicular access and frontage only along College Avenue. Project access would be proposed from a signalized main driveway and a proposed secondary right-in/right-out driveway, both on College Avenue. Project opening is forecasted to occur in 2022.

The project site is shown in **Figure 1**. A site plan is shown in **Figure 2**.

Figure 1: Project Location



PROJECT TRIP GENERATION

Weekday trip generation was based on the higher generation between City rates and historical with projected uses by Church staff. The proposed Church will not offer a day care or a children’s school during weekdays, thus the City’s House of Worship without school or day care trip rate was applied for this comparison.

The City of San Diego trip rate was applied based on the total building size of 52,585 square feet.

Weekday Trip Generation

The site-specific trip generation is based on the existing and forecasted weekday use of the Church facilities. Existing Pastoral offices located at 5555 University Avenue are open Monday-Thursday from 9AM to 6PM and closed on Fridays with a current staff of 8 to 25 persons. The proposed Pastoral offices are to be open Monday-Thursday from 9AM to 6PM and closed on Fridays with 25 to 30 anticipated staff. For trip generation purposes, the staff AM inbound is assumed to occur just before 9 AM with a total of 30 inbound trips. The staff PM outbound is assumed to have 30 outbound trips. The ADT was taken at double the peak hours (60 x 2=120 ADT) to account for lunch and/or staff errands. There are various proposed group bible studies of youth, college, married couples, etc. from 6 PM to 10 PM Monday - Thursday. These range from 30-50 for some groups and 50-100 for the highest anticipated gatherings. An average of 75 attendees was used for the weekday gathering trip generation (0 AM and 75 inbound PM). The basketball gym is proposed to be open during Pastoral office hours anticipated to have between 0 and 10 users (with an average of 5 gym users assigned for the trip generation resulting in 10 ADT with 1 AM trip and 2 PM trips).

The higher weekday project traffic volume was based on the applicant forecasted uses and was calculated at 280 ADT with 31 AM peak hour trips (31 inbound and 0 outbound) and 107 PM peak hour trips (76 inbound and 31 outbound) as shown in **Table 1**.

Table 1: Weekday Project Trip Generation

WEEKDAY (Mon-Thur, Pastoral offices closed Friday)	Rate, Size & Units	ADT	Weekday AM Peak Hr			Weekday PM Peak Hr			
			% & Total	IN	OUT	% & Total	IN	OUT	
<u>City of San Diego Trip Rate</u>									
House of Worship	5 /KSF		4%	0.8	0.2	8%	0.5	0.5	
	52.585 KSF	263	10	8	2	22	11	11	
<u>Applicant Forecasted Uses</u>									
Staff 9am-6pm (up to 30)		120		30	0		0	30	
Highest weekday bible study (avg. 75)		150		0	0		75	0	
Basketball gym (avg. 5 users)		<u>10</u>		<u>1</u>	<u>0</u>		<u>1</u>	<u>1</u>	
		280	31	31	0	107	76	31	
Highest volumes used for analysis:			280	31	31	0	107	76	31

Source: City of San Diego Trip Generation for weekday and site specific data for forecasted use. ADT - Average Daily Traffic; Split-percent inbound & outbound. Excel rounding may cause values to be slightly higher or lower than whole number.

Sunday Trip Generation

Sunday trip generation was based on the higher generation between City rates and historical with projected uses by Church staff.

The proposed Church will offer a Sunday day care/school during Sunday services, thus the City’s House of Worship with school or day care rate was applied for this comparison. The City’s peak hour rates do not specify the hours for a Sunday; therefore, the AM rate was applied for the first service and the PM rate was applied for the services that typically occurs around 10 AM and around noon.

The Sunday site specific trip generation was calculated from current Church operations at 5555 University Avenue based on current service times, attendance variation between services, and vehicle occupancy. Vehicle occupancy data are included in **Attachment B**. The existing service times occur at 8:30 AM, 10:00 AM, and 11:30 AM with the highest attendance typically occurring at 10:00 AM. Using current attendance and vehicle occupancy, a peak hour and daily vehicle forecast was determined for the maximum seating capacity of 900 seats as shown in **Table 2**.

Table 2: Existing and Forecasted Sunday Attendance for 900 Seat Occupancy

SUNDAY Service Times	Average November 2018 Attendees (Adults + Children)	Attendance % of Nov. 2018 Attendees	Normalized to 100% attendance for 10 AM service	Attendee Forecast based on full use of 900 Seats	10 AM service typically has one bus* of 35 attendees	Attendees that drive	Inbound ADT based on a vehicle occupancy of 2.30**	Inbound ADT based on a vehicle occupancy of 2.30**
8:30-9:30 AM	255	26%	63%	569	No bus	569	248	248
10:00-11:00 AM	403	41%	100%	900	35	865	376	376
11:30 AM -12:30	321	33%	80%	717	No bus	717	312	312
Totals	979	100%		2,186			936	936
							Inbound ADT	Outbound ADT
							TOTAL ADT:	1,872

*Bus is from Point Loma Nazarene University (with average 35 students) that will drop off and leave the parking lot to return for pickup.
 **Vehicle occupancy average from data collected by LOS Engineering, Inc. during services on Sun 12/2/18, Sun 12/9/18, Sun 11/10/19, and Sun 11/17/19 (Appendix A).

The higher Sunday project traffic volume between City rates and site specific rates (based on a maximum occupancy of 900 seats during the historically highest attended 10 AM service) is calculated at 1,976 ADT with 690 Sunday peak hour trips (378 outbound after the 10 AM service and 312 inbound for the 11:30 AM service) as shown in **Table 3**.

Table 3: Sunday Project Trip Generation

SUNDAY	Rate, Size & Units			ADT	Sunday			Sunday			Sunday		
					8:30 AM Service			10:00 AM Service			11:30 AM Service		
					IN	OUT	IN	OUT	IN	OUT	IN	OUT	
<u>City of San Diego Trip Rates</u>					% & Total			% & Total			% & Total		
House of Worship	20	/KSF		4%	0.8	0.2	8%	0.5	0.5	8%	0.5	0.5	
	52.585	KSF	1,052	42	34	8	42	21	21	42	21	21	
<u>Trips Rates based on Historical Data</u>													
House of Worship	900	Seats	1,872 *		248	248		376	376		312	312	
Volunteers**	50	People	100		0	0		0	0		0	0	
One Bus*** x 2 PCE	1	Bus	4		0	0		2	2		0	0	
Higher volumes used for analysis:	Totals			1,976	248	248	378	378	312	312			
				<i>Sunday Pk Hr (10:45-11:45) between two largest services (10am out+11:30am in):</i>			<i>378</i>	<i>Out</i>	<i>312</i>	<i>In</i>			
				<i>Peak Hour = 690</i>									

Source: Site specific data for Sunday use. ADT - Average Daily Traffic. Excel rounding may cause values to be slightly higher or lower than whole number. *ADT calculated by adding individual attendee inbound and outbound volumes from columns to the right. **Volunteers typically arrive before first service and leave after last service, thus peak hour for the 8:30am, 10am, and 11:30am services are zero (0). ***Bus brings in approximately 35 students from Point Loma Nazarene University only for 10 AM service, thus no buses during other service times. PCE: Passenger Car Equivalent.

VEHICLE MILES TRAVELED

The California Governor’s Office of Planning and Research (OPR) has identified Vehicle Miles Traveled (VMT) as the California Environmental Quality Act (CEQA) metric to evaluate a project’s transportation impacts. This metric must be implemented by July 1, 2020. The OPR *Transportation Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018 states on page 8 “As noted above, lead agencies have the discretion to set or apply their own thresholds of significance”. Excerpts from the OPR Technical Advisory are included in **Attachment C**.

The City’s Transportation Study Manual (TSM) (September 29, 2020) describes how a Church can be considered a Regional Public Facility (not locally serving). The existing Church has patrons from the local immediate surrounding area and regional community. The TSM methodology for analyzing a regional service facility is to use a SANDAG travel demand model for the VMT analysis. However, SANDAG does not have a Sunday travel demand model and a VMT analysis is typically focused on weekday trips. Additionally, Sunday background traffic is on average lower than weekday traffic. For these reasons, weekday project traffic is used for the VMT analysis.

A VMT analysis is required to satisfy the CEQA guidelines that utilize VMT as the measure of effectiveness. The screening criteria to determine if a detailed transportation VMT analysis is required is based on the City of San Diego *Transportation Study Manual*. A project that meets at least one of eight (8) screening criteria could be presumed to have a less than significant VMT transportation impact.

- 1) Small Project:** The project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures. RESULT: **Satisfied** because the project’s unadjusted driveway trips is calculated at 280 ADT as shown previously in Table 1.

The project does not require a detailed transportation VMT analysis because the weekday unadjusted 280 daily driveway trips is less than the 300 daily unadjusted driveway trip threshold; therefore, the project is presumed to have a less than significant transportation impact.

TRANSPORTATION DEMAND MANAGEMENT

A Transportation Demand Management plan is not required as part of the project because the project does not have 50 or more employees as documented in the Project's Climate Action Plan (CAP) Consistency Checklist.

As part of the project, the Owner/Permittee will be constructing the following pedestrian and bicycle improvements along the project's frontage on College Avenue. From the northern project boundary to the proposed signalized main project driveway, a non-contiguous sidewalk and a buffered Class II bike lane will be installed. From the proposed signalized main project driveway to the southern project boundary, a 12-foot shared path consisting of a 6-foot bike path and a 6-foot pedestrian path will be installed outside of the vehicular travel way.

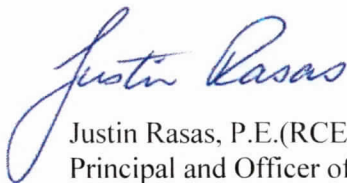
CONCLUSION

This analysis was prepared to determine if a detailed transportation VMT analysis would be required for the proposed All Peoples Church project with a sanctuary capacity of 900 seats.

The project does not require a detailed transportation VMT analysis because the weekday unadjusted 280 daily driveway trips is less than the 300 daily unadjusted driveway trip threshold; therefore, the project is presumed to have a less than significant transportation impact.

A Transportation Demand Management plan is not required as part of the project because the project does not have 50 or more employees as documented in the Project's Climate Action Plan (CAP) Consistency Checklist.

Sincerely,
LOS Engineering, Inc.


Justin Rasas, P.E.(RCE 60690), PTOE
Principal and Officer of LOS Engineering, Inc.

Attachments



SEALED ON 4/5/2021

ATTACHMENT A

Project Information Form



City of San Diego Project Information Form

Project Information

Project Name:					
Project Applicant					
Name:					
Address:					
Contact Information	Phone Number:		Email:		
Project Location and Context					
Project Address:					
APN:					
Driveway Cross Streets:					
Please attach a Project Location Map that clearly identifies project driveways and access points.					
Community Plan Area:		Land Use Designation:		Zoning Designation:	
Is any portion of the project located in an RTIP Transit Priority Area?: <input type="checkbox"/> Yes <input type="checkbox"/> No					
Project Description (with Proposed Land Uses and Intensities):					
Number of Parking Spaces:	Vehicle Spaces	Accessible Spaces	Bicycle Spaces <i>(racks and secure Storage)</i>	Motorcycle Spaces	
Identify any project features related to TDM and Identify any transportation amenities or travel demand management measures that are required based on the San Diego Municipal Code Section 142.0528 (transportation amenities) or the Climate Action Plan Consistency Checklist. For example: transit pass subsidies, unbundled parking, shuttle services, car share, bicycle supportive features (bike repair station, bike lockers, etc.).					
Please attach a project site plan that clearly identifies the following:					
<ul style="list-style-type: none"> • Land use types and quantities, and number of parking spaces provided (vehicle and bicycle) clearly identified. • Driveway locations and type (full access, partial access, right in/out only) identified. • Pedestrian access, bicycle access and on-site pedestrian circulation clearly identified. • Location/distance of closest existing transit stop and proposed transit stops identified in RTIP (measured as walking distance to project entrance/or middle of parcel). 					



City of San Diego Project Information Form

Trip Generation Estimates (calculated using the process described in the TSM):	Unadjusted Driveway Trips		Total Net New Trips	
	Daily:		Daily:	
	AM Peak Hour:		AM Peak Hour:	
	PM Peak Hour:		PM Peak Hour:	

Preliminary Screening Criteria

CEQA Transportation Analysis Screening		Screened Out	Not Screened Out
1) Select the Land Uses that apply to your project 2) Answer the questions for each Land Use that applies to your project <i>(if "Yes" in any land use category below then that land use (or a portion of the land use) is screened from CEQA Transportation Analysis)</i>			
		Yes	No
<input type="checkbox"/>	1. Redevelopment Project: a. Does the project result in a net decrease in total Project VMT? b. Answer if yes to 1a. If the project replaces affordable housing with market rate housing, are there more market rate units planned than existing affordable units being replaced.		
<input type="checkbox"/>	2. Residential Project: a. Is the project in a VMT/Capita Efficient Area (per SANDAG screening maps)? b. Does the project include Affordable Housing? $\frac{\text{Affordable Units}}{\text{Total Units}} + \frac{\text{Market Rate Units}}{\text{Total Units}} = \frac{\text{Total Units}}{\text{Total Units}}$ All affordable units are screened out.		
<input type="checkbox"/>	3. Commercial Employment Project: • Is the project in a VMT/Employee Efficient Area? (per SANDAG screening maps?)		
<input type="checkbox"/>	4. Industrial Employment Project • Is the project in a VMT/Industrial Employee Efficient Area?		
<input type="checkbox"/>	5. Retail/Public Facility/Recreational • Is the project locally serving: - Retail OR Public Facility OR Recreational		
<input type="checkbox"/>	6. Small Project • For all components of a project that are not screened out above (all 'Yes' in a land use category), what is the daily unadjusted driveway trip generation? _____ Is it less than 300 daily trips?		

Local Mobility Analysis		
Is your project's land use consistent with the Community Plan zoning?	<input type="checkbox"/> Consistent <input type="checkbox"/> Generates less than 1,000 daily trips (unadjusted driveway trips)	<input type="checkbox"/> Inconsistent <input type="checkbox"/> Generates less than 500 daily trips (unadjusted driveway trips)
Will project development be phased?		In what month are traffic counts planned to be conducted?



City of San Diego Project Information Form

If a project generates 1,000 or more daily trips (consistent with Community Plan Zoning) or 500 or more daily trips (inconsistent with Community Plan zoning), attach an exhibit showing the project's trip distribution percentages and project trip assignment using the process described in the TSM.

Land use types and number of parking spaces

All Peoples Church is proposed on the northeast corner of I-8 and College Avenue with a sanctuary capacity of 900 seats (587 fixed seats and 3,690 s.f. of non-fixed seats). The site with residential zoning RS-1-7 on approximately 6 acres is vacant.

The project’s minimum required parking based on 587 fixed seats and 3,690 sf of non-fixed seating (about 900 seats in total) is 319 spaces (196 fixed plus 123 spaces for non-fixed). The provided parking includes 319 standard spaces, 2 van accessible spaces, 6 accessible spaces, and 29 clean air vehicle standard spaces for a total of 358 automobile parking spaces. There are 17 short term bicycle spaces and 2 long term bicycle spaces. Seven motorcycle parking spaces are proposed. There is also one loading zone space. A summary of the parking is shown in **Table 1**.

TABLE 1: PROJECT PARKING SUMMARY

Project Component	Minimum Required Parking by Code	Provided Parking
Church (587 fixed seating plus 3,690 sf of non-fixed seating for about 900 seats in total)	319 Automobile Spaces 7 Motorcycle Spaces 16 Short Term Bicycle Spaces 16 Long Term Bicycle Spaces	356 Automobile Spaces 7 Motorcycle Spaces 17 Short Term Bicycle Spaces 2* Long Term Bicycle Spaces

*Requesting deviation from LDC where 16 bike spaces are required, while 2 spaces provided.

Transit facilities within a ½ mile walk shed included four bus stops. Two on College Avenue just north of Del Cerro Boulevard and two on College Ave just south of Alvarado Road. Metropolitan Transit System (MTS) lists Bus Routes 14 and 115 within ½ mile walking distance from the project access. Bus Route 14 has 60-minute headways listed for the AM and PM peak hours and Bus Route 115 has 30-minute headways listed for the AM and PM peak hours. On Sunday, Bus Route 14 does not have service and Bus Route 115 has 60-minute headways through the day. The San Diego State University trolley station is approximately 5,000 feet (just under 1 mile) walking distance from the project pedestrian access point.

Pedestrian Access

Pedestrian access is provided from one accessible route near the southwest corner of project site. No sidewalks are proposed along the project driveways due to:

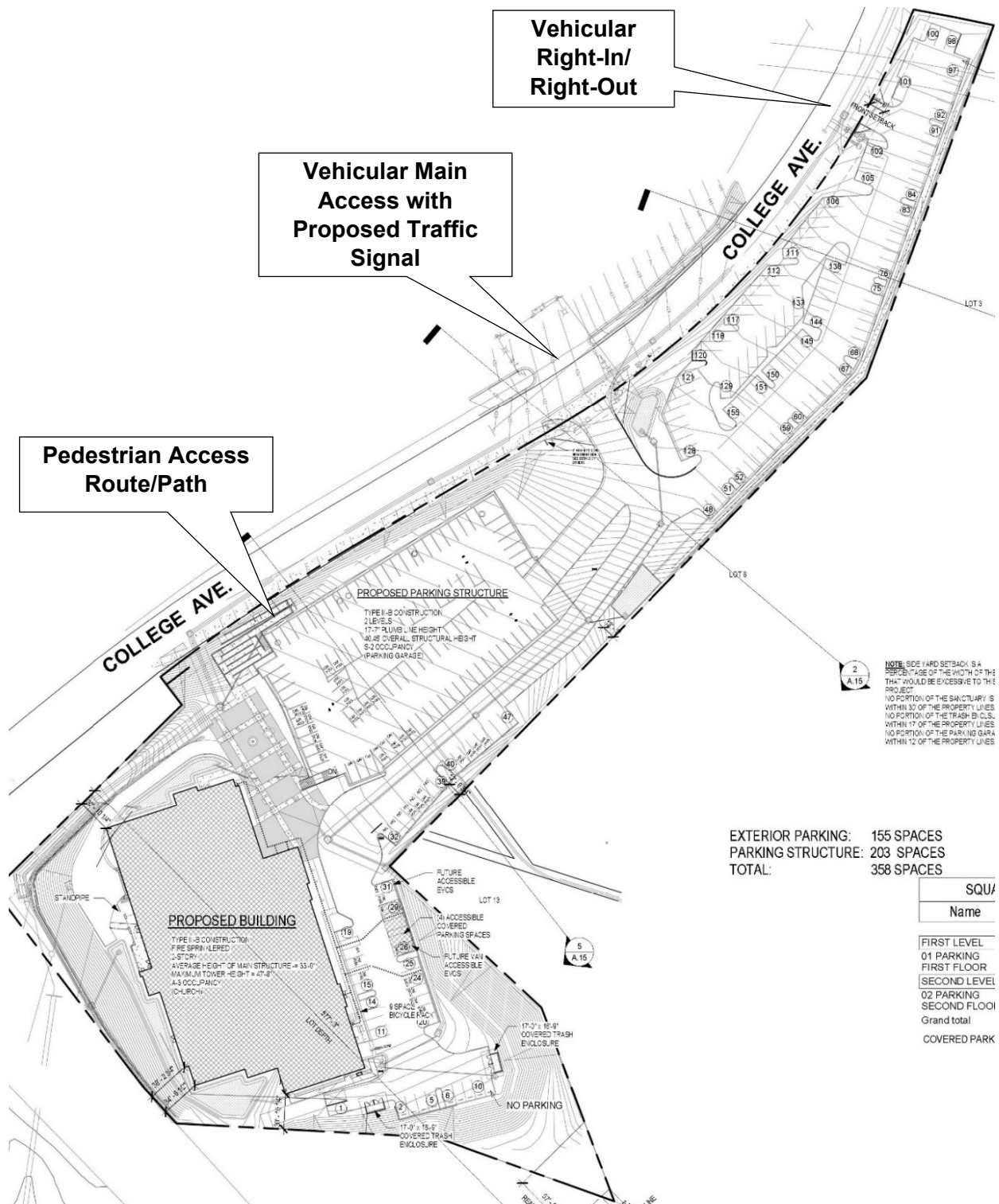
- 1) The driveways and much of the parking area has slopes that exceed ADA requirements, and
- 2) The proposed separate pedestrian accessible route fulfills the building code requirements.

The single pedestrian accessible route fulfills the building code 11B-206.2.1 requirement of at least one accessible route shall be provided between a public sidewalk and the accessible building entrance. The same building code also notes an exception as follows “An accessible route shall not be required between site arrival points and the building or facility entrance if the only means of access between them is a vehicular way not providing pedestrian access.” For the above noted reasons, sidewalks along the vehicular access point are not provided nor required.

The accessible pedestrian route is shown below.



Project Access Points



EXTERIOR PARKING: 155 SPACES
 PARKING STRUCTURE: 203 SPACES
 TOTAL: 358 SPACES

SQU/
Name
FIRST LEVEL
01 PARKING
FIRST FLOOR
SECOND LEVEL
02 PARKING
SECOND FLOOR
Grand total
COVERED PARK

ATTACHMENT B

Vehicle Occupancy Data

Vehicle Occupancy Summary from All Peoples Church at 5555 University Avenue, San Diego
Data on the next few pages

Sunday 12/2/18 11:30 AM service

Vehicles	39
People	85
Occupancy	2.18

Sunday 12/9/18 10 AM service

Vehicles	94
People	202
Occupancy	2.15

Sunday 11/10/19 8:30 AM service

Vehicles	61
People	130
Occupancy	2.13

Sunday 11/10/19 10:00 AM service

Vehicles	61
People	152
Occupancy	2.49

Sunday 11/17/19 8:30 AM service

Vehicles	73
People	184
Occupancy	2.52

Weighted Average

Vehicles	328
People	753

Avg Occupancy	2.30
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Vehicle Occupancy from All Peoples Church at 5555 University Avenue, San Diego

Sunday 12/2/18 11:30 AM service

Sunday 12/9/18 10 AM service

Vehicle	Occupancy	Vehicle	Occupancy	Vehicle	Occupancy
1	1	1	3	53	2
2	3	2	4	54	2
3	3	3	2	55	2
4	2	4	2	56	2
5	4	5	4	57	2
6	1	6	4	58	2
7	2	7	3	59	1
8	2	8	2	60	1
9	3	9	3	61	2
10	2	10	2	62	1
11	2	11	2	63	2
12	1	12	2	64	1
13	2	13	2	65	2
14	3	14	3	66	2
15	2	15	1	67	2
16	1	16	4	68	1
17	2	17	2	69	1
18	2	18	2	70	1
19	3	19	3	71	2
20	2	20	2	72	3
21	6	21	3	73	1
22	1	22	3	74	2
23	2	23	2	75	1
24	1	24	1	76	1
25	2	25	4	77	1
26	1	26	3	78	3
27	2	27	2	79	1
28	2	28	1	80	3
29	1	29	4	81	1
30	2	30	2	82	2
31	6	31	2	83	2
32	1	32	2	84	1
33	2	33	1	85	3
34	2	34	2	86	5
35	1	35	6	87	3
36	4	36	1	88	4
37	3	37	1	89	1
38	1	38	2	90	2
39	2	39	3	91	3
	85	40	2	92	2
	2.18	41	1	93	2
	Total Persons	42	1	94	3
	Avg Veh Occupancy	43	6		202
		44	1		2.15
		45	1		Total Persons
		46	3		Avg Veh Occupancy
		47	1		
		48	1		
		49	1		
		50	1		
		51	2		
		52	3		

Vehicle Occupancy from All Peoples Church at 5555 University Avenue, San Diego

Sunday 11/10/19 8:30 AM service

Vehicle	Occupancy	Vehicle	Occupancy	
1	1	53	2	
2	3	54	4	
3	1	55	1	
4	4	56	2	
5	1	57	1	
6	1	58	3	
7	2	59	2	
8	3	60	3	
9	5	61	1	
10	3		130	People
11	2		2.13	Occupancy
12	1			
13	3			
14	1			
15	2			
16	2			
17	2			
18	3			
19	3			
20	2			
21	4			
22	2			
23	1			
24	7			
25	3			
26	1			
27	6			
28	1			
29	1			
30	1			
31	2			
32	1			
33	1			
34	4			
35	2			
36	3			
37	1			
38	2			
39	3			
40	1			
41	1			
42	1			
43	2			
44	1			
45	2			
46	2			
47	2			
48	4			
49	1			
50	1			
51	1			
52	1			

Sunday 11/10/19 10:00 AM service

Vehicle	Occupancy	Vehicle	Occupancy	
1	5	53	2	
2	3	54	3	
3	2	55	3	
4	2	56	1	
5	3	57	1	
6	2	58	1	
7	2	59	2	
8	1	60	5	
9	3	61	3	
10	2		152	People
11	3		2.49	Occupancy
12	1			
13	2			
14	3			
15	1			
16	5			
17	5			
18	2			
19	3			
20	2			
21	3			
22	2			
23	1			
24	1			
25	2			
26	1			
27	2			
28	2			
29	5			
30	4			
31	4			
32	2			
33	2			
34	3			
35	4			
36	3			
37	2			
38	1			
39	2			
40	2			
41	5			
42	2			
43	1			
44	2			
45	4			
46	3			
47	2			
48	2			
49	2			
50	1			
51	4			
52	3			

Vehicle Occupancy from All Peoples Church at 5555 University Avenue, San Diego

Sunday 11/17/19 8:30 AM service

Vehicle	Occupancy	Vehicle	Occupancy	
1	1	53	2	
2	1	54	4	
3	2	55	2	
4	1	56	2	
5	2	57	3	
6	2	58	1	
7	5	59	2	
8	1	60	1	
9	2	61	3	
10	4	62	3	
11	1	63	1	
12	3	64	2	
13	3	65	1	
14	1	66	4	
15	1	67	1	
16	5	68	3	
17	5	69	6	
18	2	70	2	
19	1	71	4	
20	1	72	5	
21	6	73	4	
22	1		184	People
23	2		2.52	Occupancy
24	6			
25	3			
26	5			
27	3			
28	1			
29	2			
30	2			
31	1			
32	3			
33	1			
34	2			
35	6			
36	2			
37	2			
38	3			
39	2			
40	3			
41	2			
42	2			
43	4			
44	2			
45	2			
46	5			
47	1			
48	3			
49	2			
50	2			
51	1			
52	2			

ATTACHMENT C

Excerpts from California Governor's Office of Planning and Research

TECHNICAL ADVISORY

ON EVALUATING TRANSPORTATION IMPACTS IN CEQA



December 2018

D. General Principles to Guide Consideration of VMT

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

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

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

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

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

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

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

E. Recommendations Regarding Significance Thresholds

As noted above, lead agencies have the discretion to set or apply their own thresholds of significance. (*Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 218-223 [lead agency had discretion to use compliance with AB 32's emissions goals as a significance threshold]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th at p. 1068.) However, Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. It further directed OPR to prepare and develop criteria for determining significance. (Pub. Resources Code, § 21099, subd. (b)(1).) This section provides OPR's suggested thresholds, as well as considerations for lead agencies that choose to adopt their own

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

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

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