



Memorandum

Date: May 14, 2021
To: Nick Pappani, Raney Planning & Management, Inc.
From: Robert Del Rio, T.E.
Subject: VMT Assessment for the Proposed Manzanita Park Residential Development in Morgan Hill, California

Hexagon Transportation Consultants, Inc. has completed a vehicle-miles traveled (VMT) assessment for the proposed Manzanita Park residential development project located at the northeast corner of the intersection of Monterey Road and Tilton Avenue in Morgan Hill, California (APN: 725-01-018) (see Figure 1). The project as proposed consists of the construction of 67 residential units including 10 below market rate units spread between 12 three-story buildings on a vacant site (see Figure 2 for site plan). The purpose of this memorandum is to provide an assessment of the project's effect on VMT. The VMT assessment methodology and results are discussed below.

CEQA Transportation Analysis Scope

Historically, traffic impact analysis has focused on the identification of traffic impacts and potential roadway improvements based on delay to relieve traffic congestion that may result due to proposed/planned growth. However, with the adoption of Senate Bill (SB) 743 legislation, public agencies are required (effective July 2020) to base transportation impacts on Vehicle-Miles-Traveled (VMT) rather than level of service that typically uses delay as its metric. The change in measurement is intended to better evaluate the effects on the state's goals for climate change and multi-modal transportation. Therefore, to adhere to the state's legislation, all new development projects are required to analyze transportation impacts using the VMT metric.

VMT Evaluation and Methodology

Pursuant to Senate Bill (SB) 743, the California Environmental Quality Act (CEQA) 2019 Update Guidelines Section 15064.3, subdivision (b) states that VMT will be the metric in analyzing transportation impacts for land use projects for CEQA purposes. VMT is the total miles of travel by personal motorized vehicles a project is expected to generate in a day. VMT measures the full distance of personal motorized vehicle-trips with one end within the project. Typically, development projects that are farther from other, complementary land uses (such as a business park far from housing) and in areas without transit or active transportation infrastructure (bike lanes, sidewalks, etc.) generate more driving than development near complementary land uses with more robust transportation options. Therefore, developments located in a central business district with high density and diversity of complementary land uses and frequent transit services are expected to internalize trips and generate shorter and fewer vehicle trips than developments located in a suburban area with low density of residential developments and no transit serve in the project vicinity.

The evaluation of the project's effects on VMT was completed using Valley Transportation Authority's (VTA's) *VMT Evaluation Tool*. The VMT tool identifies the existing average VMT per capita and VMT per employee for the project area based on the assessor's parcel number (APN) of a project. Based on the project location, type of development, project description, and proposed trip reduction measures, the evaluation tool calculates the project VMT. Projects located in areas where the existing VMT is above the established threshold are referred to as being in "high-VMT areas". Projects in high-VMT areas are required to include a set of VMT reduction measures that would reduce the project VMT to the greatest extent possible.

VMT Policies and Impact Criteria

To adhere to the state's legislation, the City of Morgan Hill is currently developing the framework for new transportation policies based on the implementation of VMT as the primary measure of transportation impacts for CEQA purposes. The new policies will replace the City's current transportation policies that are based on levels of service. However, since the City has not formally adopted its own City-specific VMT policies, this study utilizes VMT analysis methodology and impact thresholds recommended in the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

Per OPR's technical advisory, VMT per resident (capita) is the recommended metric to evaluate CEQA-related transportation impacts for residential land uses. As stated in the technical advisory, OPR recommends an impact threshold of 15% below the existing VMT levels for residential land uses. OPR allows the existing VMT to be measured as regional or citywide VMT per capita. Therefore, 15% below the city-wide residential VMT per capita is established as the impact threshold for residential uses.

The VTA's VMT Evaluation Tool indicates that the citywide average VMT per capita is currently 24.64. Therefore, the OPR recommended impact threshold of 15% below the citywide average VMT per capita equates to 20.94 VMT per capita.

VMT Evaluation

The results of the VMT analysis using the VTA's VMT Evaluation Tool indicate that the existing VMT (21.75) per capita for residential uses in the project vicinity is less than the Citywide average VMT per capita (24.64).

The results also indicate that the project is projected to generate VMT per capita (20.76), that would be less than the OPR's recommended impact threshold of 20.94 VMT per capita. Therefore, the project would not result in an impact on the transportation system based on OPR's VMT impact criteria.

The VTA VMT Evaluation Tool output sheets are shown in Figure 3.

Figure 1
Site Location

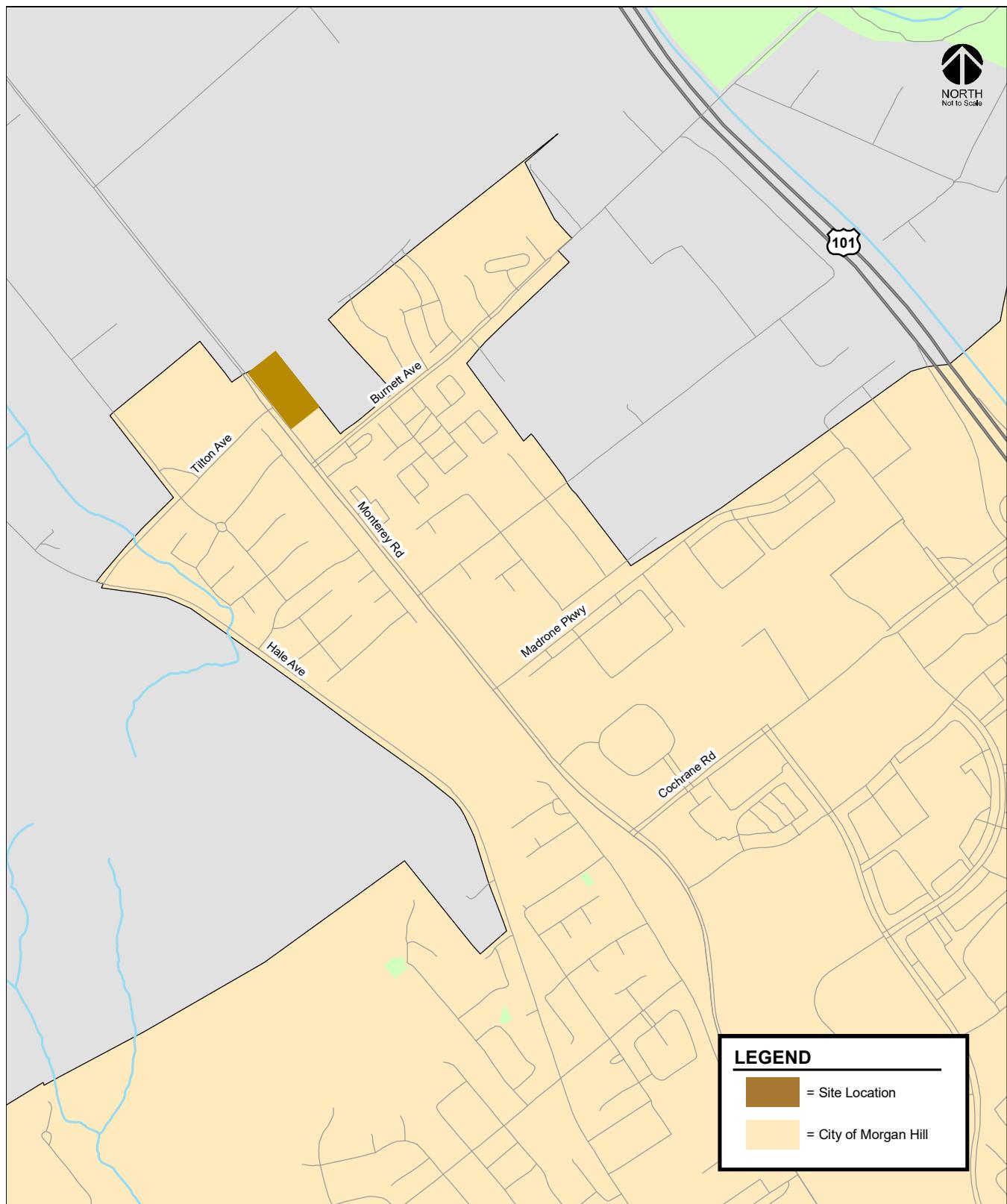


Figure 2
Site Plan



Figure 3
VTA VMT Evaluation Tool Output

