



---

**SUBJECT:** Planning Commission request regarding standards and methodology for Vehicle Miles Traveled (VMT)

**DEPARTMENT:** Community Development Department

**STAFF:** Erik Nolthenius, Planning Manager  
Alexis Morris, Director of Community Development

---

### **TITLE/RECOMMENDATION**

Provide staff direction on whether to spend time and resources on the Planning Commission's request.

### **FISCAL IMPACT**

The fiscal impact associated with this item is approximately \$175,000 and would be the responsibility of the General Fund. This includes consultant costs, data collection, outside legal review, and stakeholder workshops and meetings. If this item moves forward, staff will bring a General Fund budget request at a later date.

### **BACKGROUND**

At the July 2, 2024 meeting, Commissioner Brand requested a future agenda item regarding establishment of City VMT standards. At the August 6, 2024 meeting, Commissioner Brand explained the request in more detail. After taking public comment, the Planning Commission deliberated and voted unanimously to request that the City Council direct staff to proceed with further exploration of City-based methodology regarding VMT standards.

#### **Change in CEQA Analysis**

By way of background, effective July 1, 2020, the California Environmental Quality Act (CEQA) analysis of project-related transportation impacts shifted from the traditional method of delay and congestion (commonly referred to as level of service or LOS) to vehicle miles traveled (VMT). VMT is a metric that seeks to capture the total amount of vehicular travel associated with a project by estimating the number of vehicle trips generated and the length or distance of those trips. VMT is usually measured on a typical weekday, and can be expressed in several ways, such as total



VMT, total VMT per service population, home-based VMT per resident, and home-based work VMT per employee.

### **Senate Bill 743**

This shift in analysis is a direct result of Senate Bill (SB) 743, which was signed into law in 2013 and initiated an update to the CEQA Guidelines to change how lead agencies evaluate transportation impacts under CEQA. The goal was to more accurately measure the actual transportation-related impacts of any given project, as well as to promote the state's overarching goals of reducing greenhouse gas emissions and traffic-related air pollution, promote the development of a multimodal transportation system, and provide clean, efficient access to destinations.

### **Options to Evaluate VMT**

The City has the ability to evaluate VMT on a project-by-project basis, which it has done since implementation began in July 2020, utilizing methodology developed by the Contra Costa Transportation Authority (CCTA). CCTA's methodology uses the home-based VMT per capita metric for residential projects. Home-based VMT is the VMT for trips that begin and end at the residence. The recommended threshold of significance is that the project generated home-based VMT not exceed 85% of the same in the city.

The City also has the ability to adopt its own thresholds of significance. Pursuant to CEQA Guidelines section 15064.7, such thresholds must be adopted by ordinance, resolution, rule, or regulation. The thresholds must also be developed through a public review process, and be supported by substantial evidence.

The process would begin with hiring a traffic and/or environmental consultant to develop, test, and validate a methodology that could provide analysis of VMT and greenhouse gas (GHG) impacts of road travel into, out of, within and through Brentwood. Staff would work with the consultant to collect data, identify or develop VMT calculation tools, determine local thresholds of significance, identify mitigation measures (i.e. improve access to transit, adding bike lanes, reducing parking requirements). The process, which would include public & stakeholder workshops would take approximately 8-12 months to complete.

In the absence of City-specific VMT standards, the City has been utilizing the standards set forth in the Contra Costa Transportation Authority Growth Management Program (GMP) Guidelines. Compliance with said Guidelines is required as part of fulfillment of local jurisdictions' requirements under the GMP. According to the Guidelines, "local jurisdictions may choose to apply methods and thresholds that are



more stringent than those outlined in [the Guidelines], and would still be considered to be in compliance with CCTA GMP requirements.”<sup>1</sup>

### **CITY COUNCIL STRATEGIC INITIATIVE**

Not Applicable.

### **PREVIOUS ACTION**

Not Applicable.

### **DATE OF NOTICE**

Not Applicable.

### **ENVIRONMENTAL DETERMINATION**

Not Applicable.

### **ALTERNATIVE OPTION(S)**

Do not direct staff to spend time and resources on this Planning Commission request at this time.

### **ATTACHMENT(S)**

None.

---

<sup>1</sup> Contra Costa Transportation Authority, *Growth Management Program Implementation Documents: Implementation Guide* (revised February 17, 2021), page 103, available online at: [https://ccta.net/wp-content/uploads/2021/08/GMP\\_Implementation\\_Guide\\_FINAL\\_02172021.pdf](https://ccta.net/wp-content/uploads/2021/08/GMP_Implementation_Guide_FINAL_02172021.pdf)