Hexagon Transportation Consultants, Inc.

Memorandum

Date: March 16, 2021

To: David Hogan, M-Group

From: Gicela Del Rio, T.E.

Subject: 9130 & 9160 Kern Avenue Residential Development VMT Evaluation

Hexagon Transportation Consultants, Inc. has completed a Vehicle Miles Traveled (VMT) evaluation for the proposed residential project located at 9130 & 9160 Kern Avenue in the City of Gilroy. The project as proposed would build 29 single-family residential units on the project site. The project site is located on the east side of Kern Avenue, between St. Clar Avenue and Tatum Avenue. The site is currently vacant. Access to the project would be provided via a new driveway along Kern Avenue.

This memo summarizes the results of the evaluation of the proposed project's effect on VMT. 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 Evaluation Methodology

Vehicle Miles Traveled 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) 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 Gilroy 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. 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 Evaluation 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 the project.

The VTA's VMT Evaluation Tool indicates that the citywide average VMT per capita is currently 18.92. Therefore, the OPR recommended impact threshold of 15% below the citywide average VMT per capita equates to 16.08 VMT per capita.

VMT Evaluation

The results of the VMT analysis using the VTA's VMT Evaluation Tool indicate that the existing VMT for residential uses in the project vicinity is 19.01 VMT per capita.

The results also indicate that the project is projected to generate 18.89 VMT per capita. The project's VMT per capita is estimated to be slightly lower than the citywide average VMT per capita, however, the project's VMT would exceed the OPR's recommended impact threshold of 16.08 VMT per capita. Therefore, the project would result in an impact on the transportation system based on OPR's VMT impact criteria.

The VTA VMT Evaluation Tool output sheet is shown on Figure 1.

VMT Impacts and Mitigation

Using OPR's impact thresholds, the project would need to implement VMT reduction measures to achieve a 15% reduction (18.89 to 16.08) in its VMT per capita for the proposed residential uses to reduce its impact to less than significant levels. The project's VMT per capita could be reduced with the implementation of Travel Demand Management (TDM) strategies. TDM strategies that could be implemented by the project in an effort to reduce its VMT per capita include the following:

- TP01 – School Pool Programs: Organize a program that matches families in carpools for school pick-up and drop-off of all households from the project. Organizing a school pool program helps match parents who transport students to schools without a busing program, including private schools, charter schools, and neighborhood schools where students cannot walk or bike. The school pool program would be open to all families in the development. School pools reduce the total number of vehicle trips traveling to and from schools, thereby reducing VMT. **and**
- TP14 – Transit Service Expansion: Project subsidizes transit service through fees and contributions to the transit provider, thereby improving transit service to the project, resulting in increased use of transit and reduced VMT. There are currently no bus lines serving the project site directly. **and**
- TP18 – Voluntary Travel Behavior Change Programs: Provide a program that targets individual attitudes towards travel and providing tools for individuals to analyze and alter their travel behavior with 100% expected resident participation. These programs include mass communication campaigns and travel feedback programs, such as travel diaries or feedback on calories burned from activities and travel. This strategy encourages the use of shared ride modes, transit, walking, and biking, thereby reducing VMT.

Implementation of the above three TDM strategies, however, would not achieve the 15% reduction in VMT per capita required to mitigate the VMT impact.

OPR's recommended 15% below existing VMT impact threshold encourages developments in transit-rich, highly mixed-use areas to implement design features and trip reduction measures to take advantage of existing multi-model infrastructure and land use mixes in reducing trip making and/or trip lengths. However, many communities such as Gilroy have very limited multi-modal transportation infrastructure and lack a mix of complementary land uses. The lack of employment in these communities along with minimal transit options results in a greater number and longer commute trips. Therefore, it is highly unlikely that developments like the proposed project in these cities can achieve OPR's recommended 15% reduction in VMT. Therefore, absent of the City adopting its own City-specific VMT policies and impact thresholds, the proposed project's VMT impact must be deemed significant and unavoidable.

Table 1
VMT Analysis Results

Santa Clara Countywide VMT Evaluation Tool Report

Valley Transportation Authority
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Residential Vehicle Miles Traveled (VMT) Screening Results

Land Use Type 1:	Residential
VMT Without Project:	Home-based VMT per Capita
VMT Baseline Description 1:	City Average
VMT Baseline Value 1:	18.92
VMT Threshold Description 1:	-15%
Land Use 1 has been Pre-Screened by the Local Jurisdiction:	N/A

	Without Project	With Project & Tier 1-3 VMT Reductions	With Project & All VMT Reductions
Project Generated Vehicle Miles Traveled (VMT) Rate	19.01	18.89	18.89
Low VMT Screening Analysis	No (Fail)	No (Fail)	No (Fail)