

## MEMORANDUM

To: Claire Gallogly, AICP, City of Santa Cruz  
From: Frederik Venter, P.E. and Ali Mustafa, PTP, Kimley-Horn and Associates, Inc.  
Date: November 3, 2022  
Subject: 900 High Street – Vehicles Miles Travelled (VMT) Memo

---

This memorandum documents SB 743 compliant analysis for the proposed residential project (the “Project”) located at 900 High Street in the City of Santa Cruz, CA. The Project plans to construct approximately 40 residential dwelling units (Apartments) on the vacant land behind the Peace United Church at 900 High Street in Santa Cruz, California. As per the latest site plan dated 15 August 2022 received from the Client, the 40 units will be provided in two buildings with 2 ½ stories and could provide housing for University of California – Santa Cruz (UCSC) students. The Project site will be accessed via two driveways along High Street. The Project Site Plan is attached in **Appendix A**.

With the passage of SB 743, Vehicle Miles Travelled (VMT) has become an important indicator for determining if a new development will result in a “significant transportation impact” under the California Environmental Quality Act (CEQA). This memorandum summarizes the VMT analysis and resultant findings for the proposed project.

### Purpose of Analysis

SB 743 is part of a long-standing policy effort by the California legislature to improve California’s sustainability and reduce greenhouse gas emissions through denser infill development, a reduction in single occupancy vehicles, improved mass transit, and other actions. Recognizing that the current environmental analysis techniques are, at times, encouraging development that is inconsistent with this vision, the legislature has taken the extraordinary step to change the basis of environmental analysis for transportation impacts from Level of Service (LOS) to Vehicle Miles Travelled (VMT). VMT is understood to be a good proxy for evaluating Greenhouse Gas (GHG) and other transportation related impacts that the State is actively trying to address. While the use of VMT to determine significant transportation impacts has only been considered recently, it is by no means a new performance metric and has long been used as a basis for transportation system evaluations and as an important metric for evaluating the performance of Travel Demand Models.

In January 2019, the Natural Resources Agency finalized updates to the CEQA Guidelines including the incorporation of SB 743 modifications. The Guidelines’ changes were approved by the Office of Administrative Law and are now in effect. Specific to SB 743, Section 15064.3(c) states, “A lead agency may elect to be governed by the provisions of this section immediately. The provisions apply statewide as of July 1, 2020.”



To help aid lead agencies with SB 743 implementation, the Governor’s Office of Planning and Research (OPR) produced the Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018) that provides guidance about the variety of implementation questions they face with respect to shifting to a VMT metric. Key guidance from this document includes:

- VMT is the most appropriate metric to evaluate a project’s transportation impact.
- OPR recommends tour- and trip-based travel models to estimate VMT, but ultimately defers to local agencies to determine the appropriate tools.
- OPR recommends measuring VMT for residential and office projects on a “per rate” basis.
- OPR states that by adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Generally, retail development including stores smaller than 50,000 square feet might be considered local serving.
- OPR recommends that where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply.
- Lead agencies have the discretion to set or apply their own significance thresholds.

## City of Santa Cruz – VMT Requirements

On June 9, 2020, the City of Santa Cruz City Council enacted Resolution NS-29, which adopts a VMT threshold as the new transportation measure of environmental transportation impacts. The threshold generally establishes that a project exceeding a level of 15% below the County-wide average VMT may result in a significant transportation impact. The City has published procedures and guidelines for how best to implement SB 743 and VMT analysis for projects occurring within the City (City of Santa Cruz 2020). VMT is analyzed based on the type of land use and then screened for non-significant transportation impacts. The guidelines closely follow the recommendations and procedures as stated in the OPR Technical Advisory document described above.

The City of Santa Cruz’s VMT thresholds consider the VMT performance of residential and non-residential components of a project separately, using the efficiency metrics of VMT per capita and VMT per employee, respectively. For retail components of a project, or other customer-focused uses, the citywide VMT change is analyzed. The City of Santa Cruz’s VMT thresholds of significance in accordance with Resolution No. NS-29, 676, are summarized below for each of these components:

- Residential Projects – 15% below the county-wide per capita average VMT
- Office and Service Projects – 15% below the county-wide per employee average VMT
- Retail – No net increase in the total VMT;
- All other land uses: no net increase in VMT

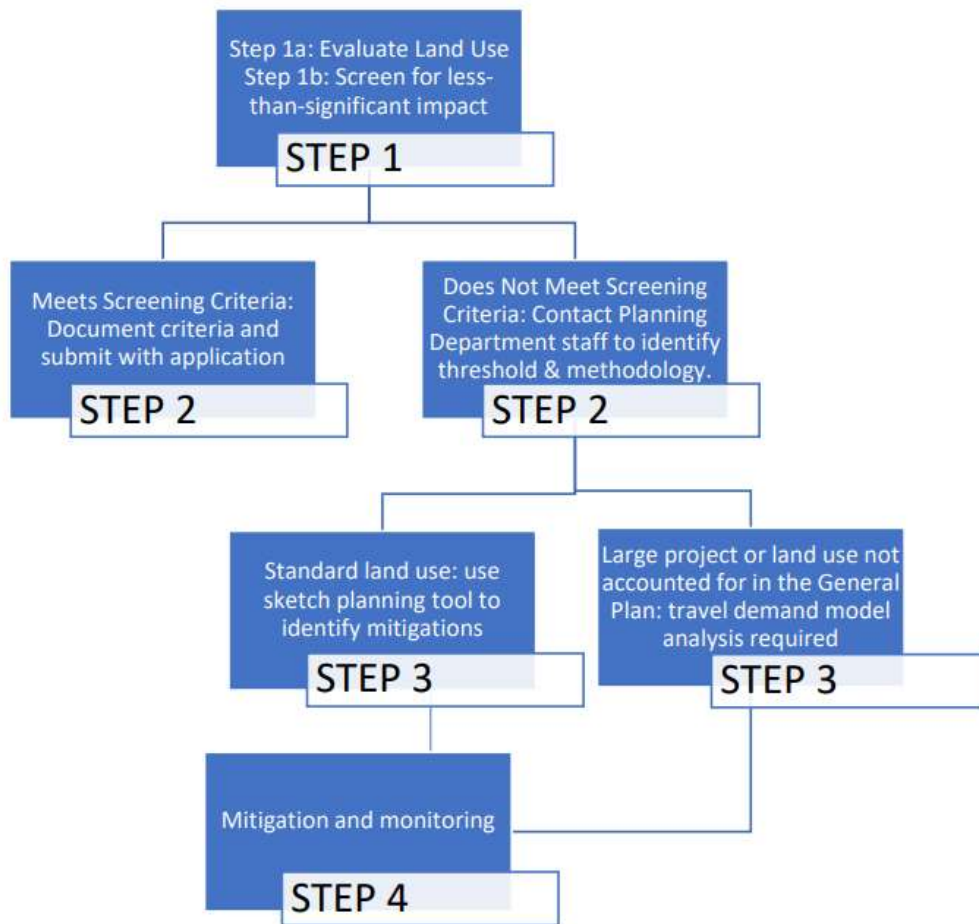
Certain projects will have a non-significant CEQA transportation impact based upon their project location and characteristics. These include:

- Small projects that generate less than 110 trips/day;
- Projects near high quality transit: within a ½ mile of a major transit stop (CPRC Section 21064.3) or a high quality transit corridor with a combined service interval frequency of 15 minutes or less during the morning and afternoon peak periods;
- Local serving retail;
- Local essential service;
- Map based screening; and
- Redevelopment projects that do not result in a net increase in VMT

## VMT Analysis Process

The VMT analysis process adopted for the proposed Project was as per *SB 743 Implementation Guidelines for the County of Santa Cruz* and is graphically illustrated in **Figure 1**.

**Figure 1: Process for CEQA VMT Analysis for Land Use Projects**



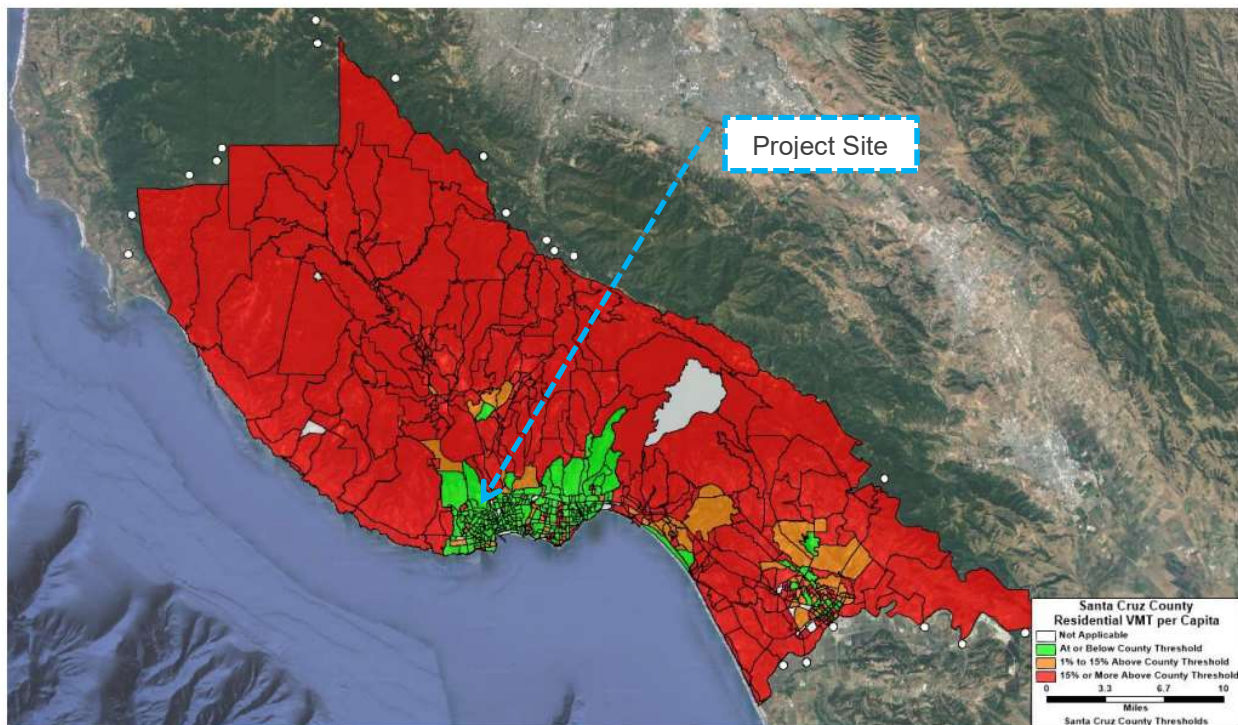
## Analysis

Based on the land use information and the latest Site Plan provided, for the purposes of SB 743 analysis and the determination of transportation related significant impacts, the proposed Project was analyzed as 'Multifamily Housing (Mid-Rise)' using Institute of Transportation Engineers (ITE) land use code LU 221.

As per ITE Trip Generation Manual, the proposed Project will generate more than 110 daily trips and does not fall under 'Small Projects' category. Additionally, the Project is not within a ½ mile of an existing major transit stop with two or more bus lines with service interval frequency of 15 minutes or less during both morning and afternoon peak periods. Under existing conditions, transit service within the Project vicinity is provided by Santa Cruz METRO with Route 10, Route 18 and Route 20 operating within ½ mile radius of the site. The service internal frequency during morning and afternoon peak periods is 30 minutes to an hour for these routes. Therefore, the Project does not fall under the 'Projects Near High Quality Transit'.

A review of 'VMT Screening Maps' for Residential land use for the Santa Cruz County shows that the proposed Project location is within the area which is at or below City VMT Threshold. The Residential Screening Map is shown in **Figure 2** below.

**Figure 2: Residential Screening Map**





Additionally, the 'VMT Screening Tool' was also used. The 'VMT Screening Tool' is used for projects which generate less than or equal to 2,000 daily trips and using either the address or the Traffic Analysis Zone (TAZ) number, the Screening Tool allows the user to determine if the Project will cause the VMT thresholds of significance to exceed and cause a significant impact. The 2019 Base Year VMT results indicate that the proposed Project VMT is less than 15% below the county-wide per capita average VMT resulting in no significant VMT impact. The results of the Screening Tool are shown in **Figure 3** below:

## Conclusion

VMT analysis for the proposed Project was conducted using both the 'VMT Screening Maps' and 'VMT Screening Tool'. As per 'VMT Screening Maps' for Residential land use, the proposed Project is located within the area identified at or below City VMT Threshold.

Additionally, as per 'VMT Screening Tool', the average VMT/Capita for Residential land uses is 10.5 and City's Threshold of 15% below the county-wide per capita average VMT is 8.9. The VMT/Capita for the proposed Project is 7.9 which is below the City's Threshold. Therefore, it can be concluded that the project meets would not cause a significant transportation impact under CEQA pursuant to SB 743.

Figure 3: Residential Screening Map

### VMT CALCULATOR

Version 1.5 Built Date 03\_11\_21

PROJECT INFORMATION

Project Name: 900 High Street  
 Address: 900 High Street, Santa Cruz, CA 95060  
 TAZ: TAZ# 873  
 Project Context/Setting: Suburban Center

ANALYSIS YEAR

Analysis Year: 2019

LAND USE INFORMATION

VMT Land Use Type: Residential  
 ITE Trip Gen Land Use: 220 | Multifamily Housing (Low-Rise)  
 Dwelling Unit(s): 40  
 Mixed-Use Adjustment: 0%

PRESUMPTIONS OF LESS THAN SIGNIFICANT IMPACT

Affordable Housing  
 Within a 1/2 mile of Major Transit Stop  
 Local Retail (<50,000 Sq Ft)  
 Less than 110 Trips per Day

SEARCH LOCATION      RESET

VMT OUTPUT

This tool is only intended for projects of 2,000 trips or less.

	PROJECT	REDUCTIONS	PROJ. WITH MITIGATION
VMT/Capita	7.9	0.0	7.9
Daily Trips	294	0	294

Average (VMT/Capita)	10.5
Threshold (15% below Average)	8.9
Significant Impact?	No

County of Santa Cruz Threshold

VMT per Capita

Category	Value
Project	7.9
Project with Mitigation	7.9
Threshold	8.9

TRANSPORTATION DEMAND MANAGEMENT (TDM) STRATEGIES

- PARKING STRATEGIES
- TRANSIT STRATEGIES
- COMMUNICATIONS & INFORMATION STRATEGIES
- COMMUTING STRATEGIES
- SHARED MOBILITY STRATEGIES
- BICYCLE INFRASTRUCTURE STRATEGIES
- NEIGHBORHOOD ENHANCEMENT STRATEGIES
- MISCELLANEOUS STRATEGIES

**APPENDIX A**



workbench

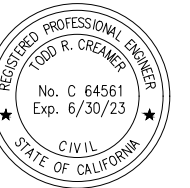
189 WALNUT AVENUE  
SANTA CRUZ, CA 95060  
WORKBENCHBUILT.COM  
P: 831.227.2217



C2G / CIVIL CONSULTANTS  
GROUP, INC.

Engineers/Planners  
4444 Scotts Valley Drive / Suite 6  
Scotts Valley, CA 95066  
931-438-4420

PEACE VILLAGE  
900 HIGH ST.  
SANTA CRUZ, CA 95060



ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE

APN number	001-022-40
Project number	2011.04
Print Date	08.15.2022
Drawn by	DD/JB
Checked by	TC
Scale	1" = 30'

All drawings and written material appearing herein constitute original and confidential work of Workbench, Inc. and may not be duplicated, used or disclosed without written consent of the Workbench, Inc.

TENTATIVE MAP

C0.1

LEGEND

- NEW E.V.A.E., PRIVATE INGRESS/EGRESS EASEMENT AND UTILITY EASEMENT
- BOUNDARY LINE
- EASEMENT LIMIT
- NEW 15'-WIDE PRIVATE STORM DRAINAGE EASEMENT

EASEMENT NOTES

THE AREA DESIGNATED AS EMERGENCY VEHICLE ACCESS EASEMENT (EVAE) IS FOR EMERGENCY VEHICLE ACCESS.

THE PUBLIC UTILITIES EASEMENT (PUE) IS DEDICATED FOR PUBLIC USE OF UTILITIES, INCLUDING ACCESS, CONSTRUCTION, INSTALLATION AND MAINTENANCE OF WORKS, IMPROVEMENTS AND THEIR APPURTENANCES FOR THE PURPOSES OF INSTALLATION AND MAINTENANCE OF PUBLIC UTILITY FACILITIES.

SURVEYOR'S STATEMENT

THE SUBJECT PROJECT SITE WAS SURVEYED (BOTH BOUNDARY AND TOPOGRAPHIC) BY ALPHA LAND SURVEYS, INC.

ABBREVIATIONS

- PUE PUBLIC UTILITY EASEMENT
- EVAE EMERGENCY VEHICLE ACCESS EASEMENT
- SVWD SCOTTS VALLEY WATER DISTRICT
- APN ASSESSORS PARCEL NUMBER
- DOC DOCUMENT
- PM PARCEL NUMBER

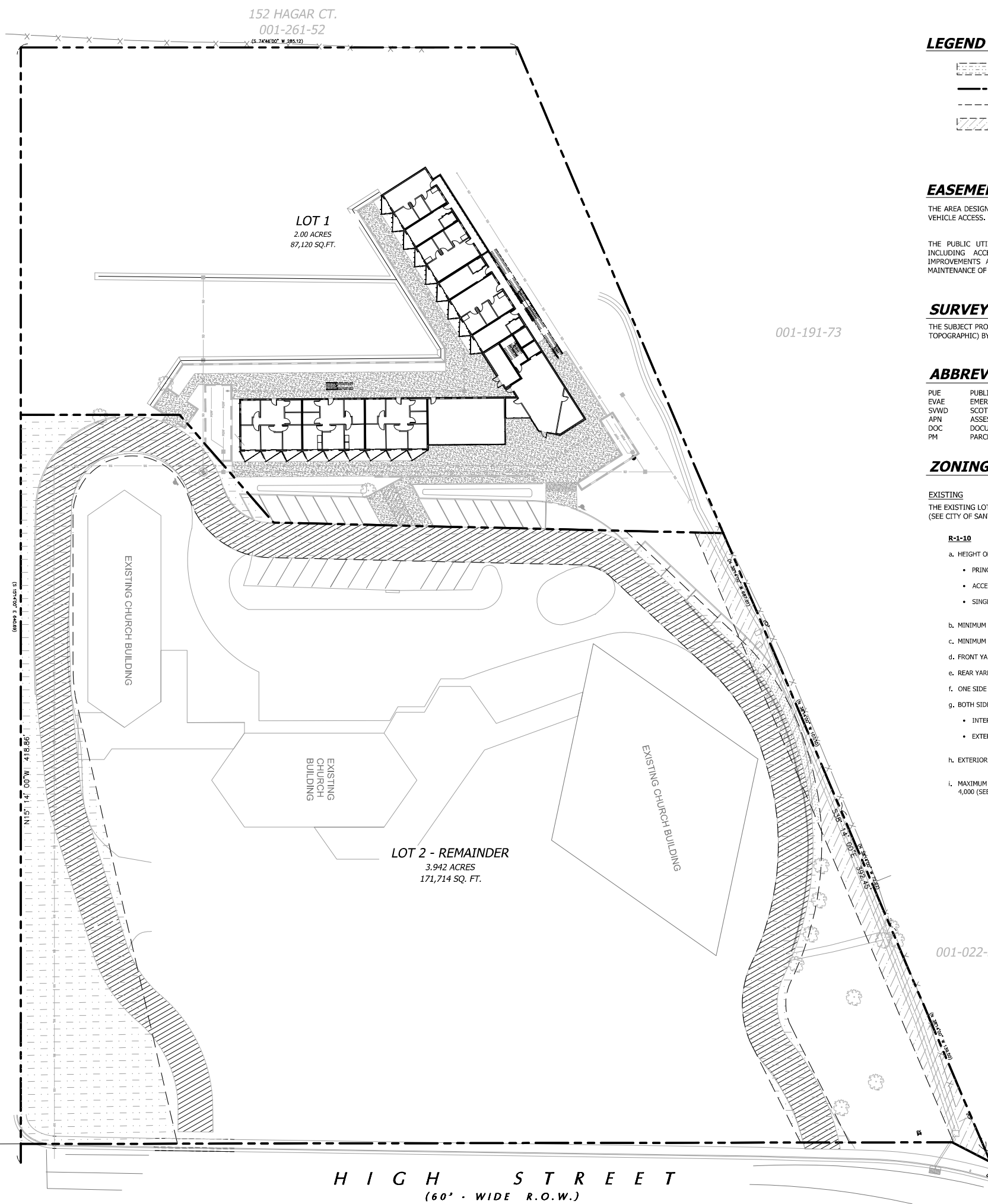
ZONING

EXISTING

THE EXISTING LOT IS ZONED R-1-10 (SINGLE-FAMILY RESIDENTIAL)  
(SEE CITY OF SANTA CRUZ, CALIFORNIA - CODE OF ORDINANCES CHAPTER 24.10.350)

R-1-10

- a. HEIGHT OF BUILDINGS (MAXIMUM)
  - PRINCIPAL: (STORIES AND FEET) 2 1/2 & 30
  - ACCESSORY: (STORIES AND FEET) 1 & 15
  - SINGLE-STORY STRUCTURE 1 & 19
- b. MINIMUM LOT AREA (NET) (SQUARE FEET) 10,000
- c. MINIMUM LOT WIDTH (FEET) 70
- d. FRONT YARD (FEET) 25'
- e. REAR YARD (FEET) 30
- f. ONE SIDE YARD (FEET) 10
- g. BOTH SIDE YARDS - TOTAL
  - INTERIOR LOT (FEET) 20
  - EXTERIOR LOT (FEET) 22
- h. EXTERIOR SIDE YARD OR END (FEET) 12'
- i. MAXIMUM BUILDING AREA WITHOUT DESIGN PERMIT 4,000 (SEE SECTION 24.08.450 FOR FINDINGS)



SCALE: 1" = 30'  
0 30 60 90

H I G H S T R E E T  
(60' - WIDE R.O.W.)

Drawing: 21/08/2022 (CAD) 2011.04 - Peace Village Church (Map) 2011.04 - C0.1 - MAP Legend: C0.1 - MAP Last Saved: Tue Oct 11, 2022 - 10:17am Last Printed: Tue Oct 11, 2022 - 4:07pm By: jaramabero