CITY OF MORGAN HILL

Regular Meeting Agenda

Planning Commission

Juan Miguel Munoz-Morris - Chairman
Mohammad Habib - Vice Chairman
Joseph Mueller - Planning Commissioner
Wayne Tanda - Planning Commissioner
Laura Gonzalez-Escoto - Planning Commissioner
Malisha Kumar - Planning Commissioner
Liam Downey - Planning Commissioner

Tuesday, June 23, 2020 7:00 pm

Council Chamber
17555 Peak Avenue, Morgan Hill, CA 95037

MEETING GUIDELINES

Meeting Guidelines

In accordance with Executive Order N-25-20 and guidance from the California Department of Public Health on gatherings, remote public participation is allowed. We will address the Order in the following ways:

Members of the public may NOT physically attend meetings at the Morgan Hill City Council Chamber.

The Planning Commission meeting will be live-streamed on Channel 17 and on the City's website. Those members of the public wishing to participate remotely may do so via the electronic meeting at: https://bit.ly/062320PlanningCommissionMeeting or by calling in to: (669) 900-9128, then enter the meeting id: 815 8678 8013 https://us02web.zoom.us/j/81586788013.

Public comment for Planning Commission meetings will be accepted via email to pcpubliccomment@morganhill.ca.gov. Members of the public participating in the electronic meeting wishing to speak may do so during public comment.

CALL TO ORDER

ROLL CALL ATTENDANCE

DECLARATION OF POSTING AGENDA

Pursuant to Government Code Section 54954.2

PLEDGE OF ALLEGIANCE

OPEN PUBLIC COMMENT PERIOD

Members of the public are entitled to address the Planning Commission concerning any item within the Morgan Hill Planning Commission's subject matter jurisdiction. Public comments are limited to no more than three minutes. Except for certain specific exceptions, the Planning Commission is prohibited from discussing or taking action on any item not appearing on the posted agenda. (See additional noticing at the end of this agenda)

ORDERS OF THE DAY

MINUTES APPROVAL

1. APPROVE THE MAY 26, 2020 MEETING MINUTES

Recommendation:

Approve Minutes.

OTHER BUSINESS

2. SENATE BILL 743 (SB 743) LEVEL-OF-SERVICE (LOS) TO VEHICLE-MILES-TRAVELED (VMT) PRESENTATION UPDATE

Recommendation:

Accept presentation by Staff and Nelson\Nygaard Consulting Associates, Inc. and provide direction as needed regarding the City's implementation of State Senate Bill 743 (SB 743) transition from Level-of-Service (LOS) to Vehicle-Miles-Traveled (VMT) metric for transportation analysis under the California Environmental Quality Act (CEQA).

DIRECTOR'S REPORT/ANNOUNCEMENTS

ADJOURNMENT

NOTICE

All public records relating to an open session item on this agenda, which are not exempt from disclosure pursuant to the California Public Records Act that are distributed to a majority of the legislative body less than 72 hours prior to an open session, will be made available for public inspection at the Office of the City Clerk at Morgan Hill City Hall located at 17575 Peak Avenue, Morgan Hill, CA, 95037 at the same time that the public records are distributed or made available to the legislative body. (Pursuant to Government Code 54957.5)

PUBLIC COMMENT

Members of the Public are entitled to directly address the Commission concerning any item that is described in the notice of this meeting, before or during consideration of that item. If you wish to address the Commission on any issue that is on this agenda, please complete a speaker request card located in the foyer of the Commission Chambers, and deliver it to the Minutes Clerk prior to discussion of the item. You are not required to give your name on the speaker card in order to speak to the Commission, but it is very helpful. When you are called, proceed to the podium and the Mayor will recognize you. If you wish to address the Commission on any other item of interest to the public, you may do so during the public comment portion of the meeting following the same procedure described above. Please limit your comments to three (3) minutes or less.

Please submit written correspondence to the Minutes Clerk, who will distribute correspondence to the Commission.

Persons interested in proposing an item for the Commission agenda should contact a member of the Commission who may plan an item on the agenda for a future Commission meeting. Should your comments require Commission action, your request may be placed on the next appropriate agenda. Commission discussion or action may not be taken until your item appears on an agenda. This procedure is in compliance with the California Public Meeting Law (Brown Act) Government Code §54950.

City Council Policies and Procedures (CP 03-01) outlines the procedure for the conduct of public hearings. Notice is given, pursuant to Government Code Section 65009, that any challenge of Public Hearing Agenda items in court, may be limited to raising only those issues raised by you or on your behalf at the Public Hearing described in this notice, or in written correspondence delivered to the Commission at, or prior to the Public Hearing on these matters.

The time within which judicial review must be sought of the action by the Commission, which acted upon any matter appearing on this agenda is governed by the provisions of Section 1094.6 of the California Code of Civil Procedure.

For a copy of Commission Policies and Procedures CP 97-01, please contact the City Clerk's office (408) 779-7259, (408) 779-3117 (fax) or by email cityclerk@morganhill.ca.gov.

AMERICANS WITH DISABILITIES ACT (ADA)

In compliance with the Americans with Disabilities Act, if you are a disabled person and you need a disability-related modification or accommodation to participate in this meeting, please contact the City Clerk's Office at (408)779-7259, (408)779-3117 (fax) or by email cityclerk@morganhill.ca.gov. Requests must be made as early as possible and at least two-full business days before the start of the meeting.

DRAFT

CITY OF MORGAN HILL

Meeting Minutes
Planning Commission

Juan Miguel Munoz-Morris	-	*Chairman*
Mohammad Habib	-	*Vice Chairman*
Joseph Mueller	-	*Planning Commissioner*
Wayne Tanda	-	*Planning Commissioner*
Laura Gonzalez-Escoto	-	*Planning Commissioner*
Malisha Kumar	-	*Planning Commissioner*
Liam Downey	-	*Planning Commissioner*

Tuesday, May 26, 2020 7:00 pm

Council Chamber
17555 Peak Avenue, Morgan Hill, CA 95037

AMENDED AGENDA

This Agenda has been amended to include a Staff Report for Item 3 and staff presentations for Items 2 and 3.

MEETING GUIDELINES

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Public comment for Planning Commission meetings will be accepted via email to pcpubliccomment@morganhill.ca.gov. Members of the public participating in the electronic meeting wishing to speak may do so during public comment.

Minutes Acceptance: Minutes of May 26, 2020 7:00 PM (MINUTES APPROVAL)

CALL TO ORDER

Chair Munoz-Morris called the meeting to order at 7:00 p.m.

ROLL CALL ATTENDANCE

Attendee Name	Title	Status	Arrived
Juan Miguel Munoz-Morris	Chairman	Present	
Mohammad Habib	Vice Chairman	Present	
Joseph Mueller	Planning Commissioner	Present	
Wayne Tanda	Planning Commissioner	Present	
Laura Gonzalez-Escoto	Planning Commissioner	Present	
Malisha Kumar	Planning Commissioner	Present	
Liam Downey	Planning Commissioner	Present	

DECLARATION OF POSTING AGENDA

Minutes Clerk Luna declared the posting of the agenda.

PLEDGE OF ALLEGIANCE

Planning Commission Downey led the Pledge of Allegiance at 7:01 p.m.

ANNOUNCEMENTS

Minutes Acceptance: Minutes of May 26, 2020 7:00 PM (MINUTES APPROVAL)

FREE COVID TESTING

Free Covid testing is available at the following locations:

Christopher High school Gymnasium
850 Day Road
Gilroy, CA 95037

Call or visit the website to schedule an appointment
Monday - Friday 7:00 a.m. - Noon & 1:00 p.m. - 7:00 p.m.
1 (888) 6434-1123
https://lhi.care/covidtesting

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St. Louise Regional Hospital - DePaul Health Center
18550 De Paul Drive #109
Morgan Hill, CA 95037

Call Valley Connections or visit the website to schedule an appointment
Everyday 8:30 a.m. - 4:30 p.m.
1 (888) 334-1000
https://www.scvmc.org/patients-and-visitors/for-patients/Pages/covid-19-testing.aspx

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Visit Santa Clara County Public Health for more free Covid-19 testing sites:
sccfreetest.org

OPEN PUBLIC COMMENT PERIOD

Chair Munoz-Morris opened the Public Comment Period at 7:04 p.m. The following individuals addressed the Planning Commission:

- Joe Baranowski

Hearing no further requests to speak, the Public Comment Period was closed.

ORDERS OF THE DAY

No changes made.

MINUTES APPROVAL

1. APPROVE THE MAY 12, 2020 MEETING MINUTES

Recommendation:

Approve Minutes.

RESULT:	**ACCEPTED [UNANIMOUS]**
MOVER:	Joseph Mueller, Planning Commissioner
SECONDER:	Laura Gonzalez-Escoto, Planning Commissioner
AYES:	Munoz-Morris, Habib, Mueller, Tanda, Gonzalez-Escoto, Kumar, Downey

PUBLIC HEARINGS

2. UP2019-0005: RAILROAD-GOYAL REQUEST FOR A CONDITIONAL USE PERMIT TO OPERATE A FREIGHT TERMINAL IN CONJUNCTION WITH THE DEVELOPMENT OF AN APPROXIMATELY 21,000 SQUARE FOOT INDUSTRIAL DEVELOPMENT ON A 2.66-ACRE SITE LOCATED AT 16500 RAILROAD AVENUE.

Recommendation:

1. Open/Close public hearing; and
2. Adopt a Resolution approving the Conditional Use Permit.

The Planning Commission meeting recessed at 7:12 p.m.
The Planning Commission meeting reconvened at 7:18 p.m.

Community Development Director Jennifer Carman presented the Staff Report.

Chair Munoz-Morris opened the Public Hearing at 7:47 p.m.

MOTION:
Adopt a Resolution approving the Conditional Use Permit with the following modifications: Where the term "Truck Terminal" is used add the term "Fright Terminal" in parenthesis, add a condition to have a state law reminder sign posted regarding the allowable time Trucks can warm up, and add language to Section 3 correcting the number of average truck trips indicated in the Statement of Operations from 20 trips to 48 trips.

RESULT:	**ADOPTED AS AMENDED [5 TO 2]**
MOVER:	Joseph Mueller, Planning Commissioner
SECONDER:	Laura Gonzalez-Escoto, Planning Commissioner
AYES:	Munoz-Morris, Habib, Mueller, Gonzalez-Escoto, Kumar
NAYS:	Tanda, Downey

OTHER BUSINESS

3. IDEAS FOR ECONOMIC DEVELOPMENT RESILIENCY THROUGH LAND USE

Recommendation:

Planning Commission to receive presentation.

The Planning Commission meeting recessed at 9:02 p.m.
The Planning Commission meeting reconvened at 9:09 p.m.

Economic Development Director Edith Ramirez presented the Staff Report at 9:10 p.m.

Minutes Acceptance: Minutes of May 26, 2020 7:00 PM (MINUTES APPROVAL)

Chair Munoz-Morris opened the Public Comment Period at 10:40 p.m. Hearing no requests to speak, the Public Comment Period was closed.

No action Taken. The Planning Commission received the presentation and provided staff with feedback.

RESULT:	**NO ACTION TAKEN**

DIRECTOR'S REPORT/ANNOUNCEMENTS

Community Development Director Jennifer Carman made an announcement.

ADJOURNMENT

There being no further business, Chair Munoz-Morris adjourned the meeting at 10:42 p.m.

MINUTES PREPARED BY:

Jenna Luna, Minutes Clerk

Minutes Acceptance: Minutes of May 26, 2020 7:00 PM (MINUTES APPROVAL)

CITY OF MORGAN HILL

PLANNING COMMISSION STAFF REPORT
MEETING DATE: June 23, 2020

PREPARED BY: Adam Paszkowski, Principal Planner
APPROVED BY: Jennifer Carman, Community Development Director

SENATE BILL 743 (SB 743) LEVEL-OF-SERVICE (LOS) TO VEHICLE-MILES-TRAVELED (VMT) PRESENTATION UPDATE

RECOMMENDATION(S)

Accept presentation by Staff and Nelson\Nygaard Consulting Associates, Inc. and provide direction as needed regarding the City's implementation of State Senate Bill 743 (SB 743) transition from Level-of-Service (LOS) to Vehicle-Miles-Traveled (VMT) metric for transportation analysis under the California Environmental Quality Act (CEQA).

BACKGROUND:

Historically, the City has used the level of service (LOS) methodology to: a) manage vehicle traffic movement and gauge intersection and road arterial operations; b) coordinate planning for future growth; and c) assess environmental impacts associated with vehicle movement. In September 2013, Governor Brown signed Senate Bill 743 (SB 743) into law, establishing new legislation which mandates a major change in the California Environmental Quality Act (CEQA) Guidelines. Effective July 1, 2020 the SB 743 legislation requires that local jurisdictions shift from use of LOS for CEQA review of vehicle movement impacts (delay) to a method that assesses the distance of vehicle travel attributed to a project or use. This shift focuses review to regional traffic and reducing greenhouse gas (GHG) emissions, rather than vehicle impacts on the local roadway network. Specifically, SB 743 required the Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide alternative criteria for evaluating transportation impacts to promote the reduction of greenhouse gas emissions, the development of multimodal transportation systems, and a diversity of land uses. With OPR's December 2018 Technical Advisory on Evaluating Impacts in CEQA, the method used to assess distance of vehicle travel is vehicle miles traveled (VMT).

In simple terms, VMT measures the amount and distance of vehicle travel attributed to a project or use. Specifically, VMT focuses on determining the origin and destination of travel patterns. Unlike LOS, VMT does not assess the local vehicle trips from a project or the project's traffic impacts on a local intersection or road/highway segment. Rather, VMT assesses the effects of the project on regional traffic and use of transit and non-motorized travel. VMT is not a new methodology; it has been used for many years in CEQA documents in estimating pollution (air quality impacts), GHG emissions and energy consumption. VMT is typically calculated using a travel demand model, which estimates the total number and length of vehicle trips to and from a given geographic area, such as transportation analysis zones (TAZs).

Although SB 743 requires VMT analysis to be utilized starting July 1, 2020, a Citywide VMT policy is not required to be in place by that date. Instead, land development projects may be evaluated on a case-by-case basis to meet these requirements.

During the March 10, 2020 Planning Commission meeting the City's consultant, Nelson\Nygaard Consulting Associates, Inc., provided an informational presentation regarding SB 743 and VMT. On April 28, 2020, the Nelson/Nygaard team provided an update on the review of existing policies, VMT tools, and case studies.

ANALYSIS:

Nelson\Nygaard has prepared the Defining Goals, Objectives, and VMT Thresholds of Significance memo dated June 2020 (Attachment 1) which builds on the existing legal framework, best practices and VMT analysis tools to establish transportation impact analysis goals, objectives and recommendations for VMT-based CEQA analysis.

LINKS/ATTACHMENTS:

1. Defining Goals, Objectives, and VMT Thresholds of Significance memo

NELSON
NYGAARD

MEMORANDUM

To: Adam Paszkowski, City of Morgan Hill

From: Nelson\Nygaard

Date: June 16, 2020

Subject: Defining Goals, Objectives, and VMT Thresholds of Significance

INTRODUCTION

This memo builds on the previous review of the existing legal framework, best practices, and vehicle miles traveled (VMT) analysis tools to establish transportation impact analysis goals and objectives and recommendations for VMT-based analysis that meets the updated requirements for the California Environmental Quality Act (CEQA). Recommendations presented here are made by the Nelson\Nygaard team upon a review of state CEQA guidance, VMT research, and professional expertise. This document is comprised of the following four sections:

- Section 1: Goals and Requirements for Policy Update provides the basis for developing transportation analysis policies to comply with state requirements in a way that meets Morgan Hill's values.
- Section 2: Overview of Transportation Analysis provides an overview of the process of using VMT for the CEQA analysis.
- Section 3: Project Screening contains the recommended VMT thresholds for Morgan Hill as well as the rationale.
- Section 4: VMT Thresholds of Significance presents screens and criteria applicable in Morgan Hill for projects that can be presumed to have a less-than-significant transportation impact.

Attachment: Defining Goals, Objectives, and VMT Thresholds of Significance memo (2745 : LOS-to-VMT Update)

2 BRYANT STREET, SUITE 300 SAN FRANCISCO, CA 94105 415-284-1544 FAX 415-284-1554
www.nelsonnygaard.com

1 GOALS AND REQUIREMENTS FOR POLICY UPDATE

CEQA Policy Requirements

Senate Bill 743 (SB 743) establishes new criteria for determining the significance of transportation impacts under the California Environmental Quality Act (CEQA). The significance criteria set by a lead agency must, "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses."[1] SB 743 aligns the CEQA significance criteria with the State's climate goals as quantified in the greenhouse gas (GHG) emissions reduction targets. Vehicle level of service (LOS), which measures traffic delay, can no longer be used to measure transportation impacts in CEQA since LOS is not an appropriate measure of GHG emissions and mitigating LOS can hinder the development of multimodal transportation networks.

The California Air Resources Board (CARB) develops the Scoping Plan for how the State will achieve the 2030 and 2050 GHG emissions reduction goals, assuming continued economic and population growth[2]. CARB's modeling scenarios developed for the 2017 Scoping Plan account for cleaner technologies and fuels for the transportation fleet such as hybrid and electric vehicles. The CARB modeling determined that while total VMT will grow slightly over the next three decades, primarily due to population growth, the VMT *per capita* must decrease to meet the State's climate goals.

The CARB Scoping Plan quantifies the VMT reduction needed to achieve State climate goals, and informs the recommendations on setting CEQA significance thresholds made by the Governor's Office of Planning and Research (OPR) in their Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory). Based on OPR's review of the applicable research, including the CARB's quantification of necessary VMT reduction, OPR recommends adoption of a VMT per capita or per employee that is fifteen percent below that of existing development[3]. Developing alternative thresholds to the OPR recommendation must still meet the CEQA Guidelines for significance criteria.

CEQA Exemptions

CEQA allows for the exemption of certain classes of projects specified in CEQA statue or Guidelines from the requirements for the preparation of environmental review. These exemptions were in place when LOS was used to measure transportation impacts in CEQA. A proposed project is exempt from CEQA review, and therefore also exempt from VMT analysis, if:

- The project is exempt by Statute commencing with Section 15260 of the CEQA Guidelines;
- The project is exempt pursuant to a categorical exemption commencing with Section 15300 of the CEQA Guidelines and the application of that categorical exemption is not barred by one of the exceptions set forth in Section 15300.2 of the CEQA Guidelines; or
- The activity is covered by the commonsense exemption that CEQA applies only to projects that have the potential for causing a significant impact on the environment.

A Statutory Exemption is used to exempt ministerial projects (e.g., building permits and Substantial Conformance Review) and certain types of discretionary projects (e.g., emergency projects, pipelines less

[1] CEQA Guidelines § 15064.3, subd. (b) Criteria for Analyzing Transportation Impacts.

[2] 2030 goal is a 40 percent reduction in emissions from 1990 levels and 80 percent reduction by 2050. CARB 2017 Scoping Plan – Identified VMT Reductions and Relationship to State Climate Goals, January 2019.

[3] Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.

Attachment: Defining Goals, Objectives, and VMT Thresholds of Significance memo (2745 : LOS-to-VMT Update)

than a mile) regardless of impacts. Categorical Exemptions are used to exempt certain types of discretionary projects where there is no "reasonable possibility" for a significant impact, and they are declared to be categorically exempt from the requirement for the preparation of environmental documents. Therefore, if a proposed project meets one of these exemptions it is determined that the project related VMT is also exempt from CEQA and/or has no significant impact on the environment and VMT does not need to be analyzed.

Developing Alternative Thresholds

OPR's Technical Advisory is not a binding document, cities and public agencies have discretion to develop and adopt their own thresholds or adopt thresholds recommended by other agencies. State agencies are aligned in recommending a 15% reduction from existing VMT as the threshold for most land use types. A CEQA **threshold of significance** is an identifiable quantitative, qualitative, or performance level of a particular environmental effect. An alternative threshold from OPR's would require substantial evidence that the criteria for SB 743 are met, including meeting the State's GHG reduction goals. "**Substantial evidence**" means enough relevant information and reasonable inferences that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.[4]

OPR explicitly defines the following significance thresholds:

- Residential – 15% below existing local *or* regional VMT per capita
- Office – 15% below existing *regional* VMT per employee
- Retail – net increase in total VMT

There is precedent from other cities to define thresholds of significance differently from the above mentioned land uses for other types of land use such as industrial. The same VMT measurement (VMT per capita, VMT per employee, or net change in VMT) should still be used for other analysis approaches. A detailed review of considerations and the Nelson\Nygaard team's recommendations for the City of Morgan Hill are presented in the VMT Thresholds of Significance section.

Adopting a threshold of significance for residential, office, or retail land use that deviates from the OPR recommendations would require substantial evidence that the alternative threshold is aligned with California's environmental goals and the CEQA Guidelines. Alternative threshold definitions could face potential challenge by commenting organizations such as Caltrans[5] and Valley Transportation Authority (VTA), as well as the public.

Cities that have defined their own thresholds of significance separately from OPR's Technical Advisory have implemented SB 743 as part of a general plan update process. In these cases, the VMT and land use modeling done for the general plan process provides the substantial evidence to support the alternative thresholds. Alignment between the general plan, the sustainable communities strategy (*Plan Bay Area* for Morgan Hill), and statewide GHG reduction modeling is required.

Specific Plans

Specific plans can provide local, context-specific modeling of VMT and VMT mitigations, including VMT reductions from capital improvements that reduce VMT beyond what is typical or feasible at a project level. Specific plans do not have sufficient levels of modeling and analysis to define alternative thresholds to the OPR recommendations. Using the OPR recommended thresholds, specific plan modeling can

[4] *Protect the Historic Amador Waterways v. Amador Water Agency (2004)*, referenced in the Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.

[5] Caltrans has developed a draft Transportation Impact Study Guide (TISG) for evaluation of transportation impacts of land use projects. The Caltrans recommendations are aligned with the OPR Technical Advisory.

Attachment: Defining Goals, Objectives, and VMT Thresholds of Significance memo (2745 : LOS-to-VMT Update)

quantify the cumulative VMT reduction measures needed to bring the plan area's VMT below the threshold. Projects at the site level would be required to contribute proportionally to the VMT mitigations identified by the specific plan. This approach provides a mechanism for developing in high-VMT areas by defining a coordinated plan to reduce VMT for the plan area through investments in community level multimodal transportation and other VMT reducing measures to mitigate VMT at the neighborhood level.

Transportation Impact Analysis Policy Goals

The following goals were developed from a review of the City of Morgan Hill's policies and plans as well as discussion with City staff and Planning Commission. These goals are intended to inform the approach to developing VMT-based transportation impact analysis metrics as part of the implementation of SB 743:

Clarity – Clarify the development process and expectations in the policy and supporting documents. VMT should be understandable.

Support City Plans – Streamline developments in low VMT areas and areas near transit that are planned for growth. Work to align the transportation review process with the economic development envisioned in the City's Economic Development Blueprint.

Mitigation – Establish a process to mitigate impacts that includes funding for multi-modal transportation improvements.

Context – Establish thresholds that minimize barriers to the planned housing and employment growth envisioned in the General Plan and Economic Development Blueprint.

Maintain Traffic Operations – Continue to measure Level of Service (LOS) outside of CEQA using a Local Transportation Analysis (LTA) or other mechanism. An LTA evaluates the effects of a development project on transportation outside of CEQA to ensure functional local transportation systems, encourages reduction in vehicle trips, and addresses issues related to operations and safety for all transportation modes.

2 OVERVIEW OF TRANSPORTATION ANALYSIS

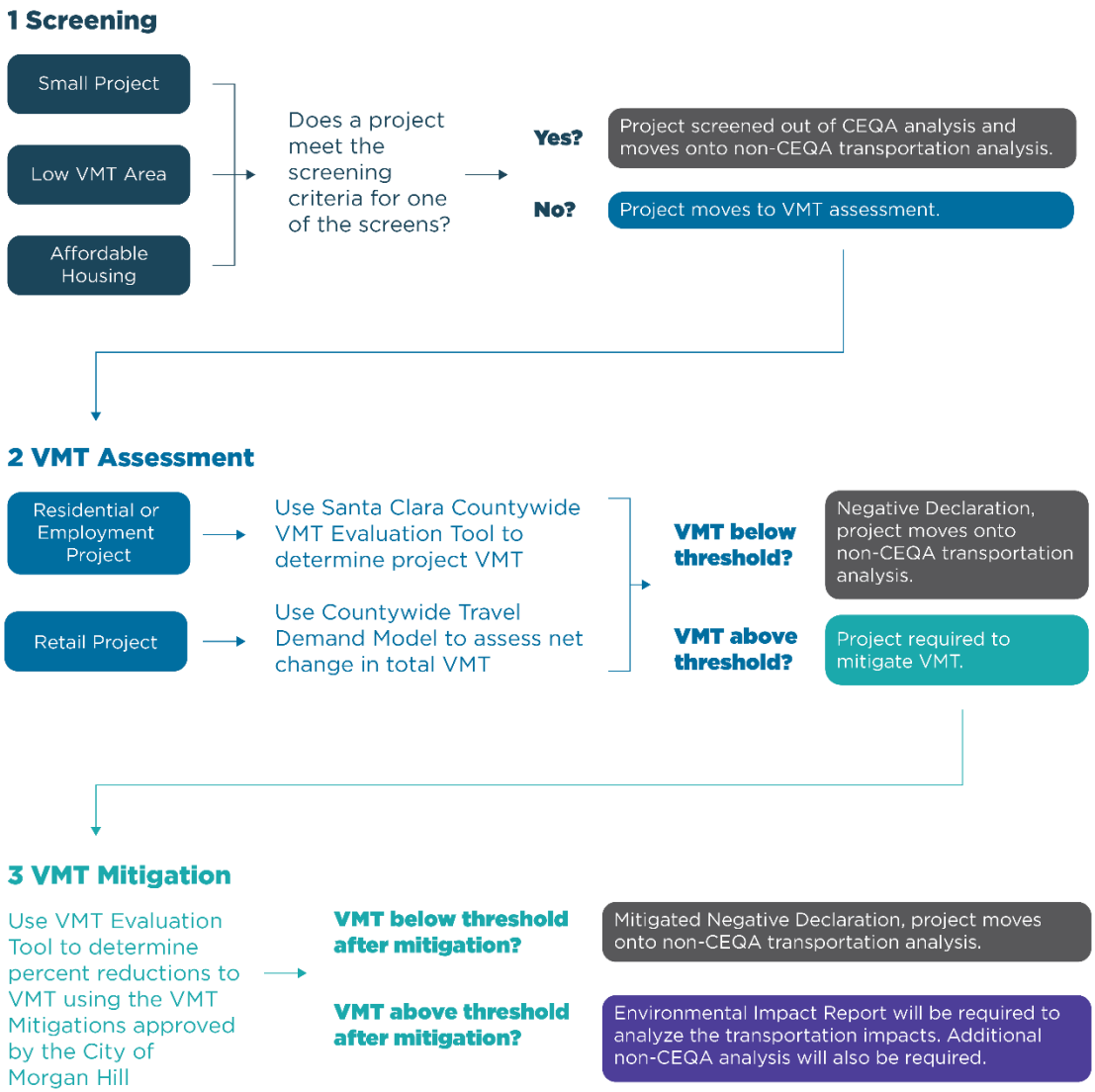
Using VMT metrics for the transportation impact analysis allows the development of screens, VMT-maps, and VMT calculation tools to simplify the process for City of Morgan Hill staff as well as the public. Unlike the existing LOS-based process, VMT analysis for most projects does not have to be recalculated for each project. Figure 1 provides an overview of the VMT-based CEQA review process for transportation impacts. The process is divided into three phases:

1. Screening – to determine if a project can be filtered out of the VMT-based transportation analysis required for CEQA.
2. VMT Assessment – determine project VMT, compare to thresholds of significance to determine if there is a significant environmental impact.

Attachment: Defining Goals, Objectives, and VMT Thresholds of Significance memo (2745 : LOS-to-VMT Update)

3. VMT Mitigation – to mitigate VMT impacts for projects with VMT that is higher than the threshold.

Figure 1 CEQA Transportation Impact Analysis Process Using VMT



Attachment: Defining Goals, Objectives, and VMT Thresholds of Significance memo (2745 : LOS-to-VMT Update)

3 PROJECT SCREENING

OPR recommends streamlining CEQA review of projects to identify areas where less detailed environmental review can be presumed. Streamlining the transportation analysis of VMT-reducing land use and transportation projects reduces the time, resources, and money spent on completing studies. Streamlining can also help to facilitate the development of walkable communities and the removal of barriers to housing production in areas that have access to services and transportation options. There are four types of screens to consider for Morgan Hill:

- **Small projects.** Small projects can be considered less than a significant impact.
- **Low-VMT areas.** A map-based screen uses VMT maps to identify areas that are below the threshold for residential and office land uses.
- **Near transit stations.** CEQA Guideline Section 15064.3 (b)(1) allows a presumption of less than significant impact near major transit stops and high-quality transit corridors.
- **Affordable housing.** A large body of research supports the finding of lower VMT per capita from developments with a high percentage of affordable housing.

Screened projects must meet specific criteria for density, use, and other requirements to support the low VMT presumption shown in Figure 2. Together the screens are intended to streamline development aligned with the implementation of General Plan development goals by removing the time and expense of complex EIRs when the transportation impacts can be presumed to not have a significant impact. This allows the development process to focus on other aspects of the project such as design and non-transportation impacts.

Figure 2 Recommended Screening Criteria for CEQA Transportation Analysis for Development Projects

Screen Type	Recommended Screening Criteria
Small Projects	▪ Single-family detached housing of 15 units or less; OR ▪ Single-family attached or multi-family housing of 25 units or less; OR ▪ Office of 10,000 square feet of gross floor area or less; OR ▪ Industrial project of 30,000 square feet of gross floor area; OR ▪ Project generating 110 trips a day or less for other land use[6]
Local Serving Retail	▪ 50,000 square feet of total gross floor area or less
Location-based screening for Residential Projects	▪ Location: In an area with low (below the threshold) VMT per capita ▪ Density: A density of 20 units per acre or greater; or the maximum allowed if zoned at a lower density than 20 units per acre ▪ Parking: No more than the minimum number of parking spaces required ▪ Displacement: Does not replace affordable residential units with a smaller number of moderate- or high-income residential units ▪ Consistent with Plan Bay Area, the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Transportation Commission)

[6] Trip generation for a specific project is determined using the latest edition of the ITE Trip Generation Manual and is approved by the City.

Attachment: Defining Goals, Objectives, and VMT Thresholds of Significance memo (2745 : LOS-to-VMT Update)

Screen Type	Recommended Screening Criteria
Transit proximate location screening for residential, employment, and retail	Location: In an area within a half mile of a major transit stop or high-quality transit corridor ▪ Density: A residential land use minimum density of 20 units per acre or greater; or the maximum allowed if zoned at a lower density than 20 units per acre. Employment land use minimum gross floor area ratio (FAR) of .5 or greater; or the maximum allowed if zoned at a lower density than .5 FAR. ▪ Parking: No more than the minimum number of parking spaces required ▪ Displacement: Does not replace affordable residential units with a smaller number of moderate- or high-income residential units ▪ Consistent with Plan Bay Area, the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Transportation Commission)
Restricted Affordable Residential Projects or Components	▪ City-wide: 100% deed-restricted affordable housing (exception for the manager's unit(s)); affordability must extend for a minimum of 55 years for rental homes or 45 years for for-sale homes. Affordability for this purpose is restricted to households making 80% or less of the area's median income OR ▪ Below average VMT areas: Projects that are 80% affordable for very low income OR 50% affordable for extremely low income Additionally: ▪ On-site manager unit(s) and non-residential components exempted from affordability requirement ▪ Parking: No more than the minimum number of parking spaces required

Small, Infill Project Screen

CEQA provides a categorical exemption for existing facilities, including additions up to 10,000 square feet, if the project is sufficiently served by public infrastructure and not in an environmentally sensitive area. OPR recommends that the equivalent daily trips for a development of this size be used as the size screen to encourage infill development. Per ITE Trip Generation Manual (10th Edition), 10,000 square feet of building area utilized by the most common employment types of land use (offices) produce an estimated 110-124 daily trips.

It is also appropriate to use that trip count threshold as the screen for residential land uses. Small infill projects significantly served by public infrastructure are presumed to have a less-than-significant impact. Therefore, employment and residential land uses that generate fewer than 110-124 daily trips are presumed to have a less-than-significant impact. Projects that generate daily trips exceeding the trip threshold are required to go through the remaining screens. If the remaining screens do not apply, then the project must undergo a transportation impact analysis.

San José provides an alternative approach to defining a small, infill project. San José Council Policy 5-1 establishes the presumption of less-than-significance for 144 daily trips for residential projects, 15 single-family or 25 attached dwelling units. Their TIA Handbook also determines that 110 daily trips is 10,000 square feet of office space and 30,000 square feet of industrial space.

Currently, Morgan Hill typically requires transportation impact analysis for projects that generate 100 peak hour p.m. trips or more and can require analysis for smaller projects. Figure 3 uses ITE estimates to compare land use project sizes with the existing screen of 100 PM Peak Hour Trips and the small infill project recommended screen of 110 trips per day and an alternative approach used by the City of San José. OPR's recommendation of a screen for local-serving retail is 50,000 square feet, higher than Morgan

Attachment: Defining Goals, Objectives, and VMT Thresholds of Significance memo (2745 : LOS-to-VMT Update)

Hill's previous screen based on peak trips (shown in Figure 3). Cities can also conduct a market study or economic impact analysis to determine if a larger screen is warranted.

Figure 3 Project Size Screen

Land Use Type	Land Use Category	Morgan Hill's Existing Approach (100 PM Peak Hour Trips)	OPR Recommended Approach (110 Daily Trips)	Recommended Alternative Approach (110-144 Daily Trips)
Residential	Single Family Residential	100 dwelling units	12 dwelling units	15 dwelling units
	Multifamily Housing	244 dwelling units	20 dwelling units	25 dwelling units
Employment Land Use	Office	70,423 SF (general office)	10,000 SF	10,000 SF
	Industrial	120,482 SF	22,000 SF	30,000 SF
Retail	Shopping Center	23,753 SF	50,000 SF	50,000 SF
	Grocery Store	13,158 SF		

Low-VMT Areas – Map Based Screening

Map-based screens help to simplify VMT analysis by easily identifying projects that can presumably fall below the VMT thresholds of significance. For most land use projects, the location is the most important determinant of VMT. Projects that locate in areas with low VMT, and incorporate similar features (i.e. density, mix of uses, transit accessibility) will exhibit similarly low VMT. It is important to note that the low-VMT screen only applies to residential land uses.

Figure 4 shows the residential land use screen for the City of Morgan Hill using the OPR recommended residential threshold. The area shown in blue is all the area below the recommended threshold of significance. The screen presents the maximum area where residential projects can be screened out, but additional refinement such as areas with planned growth areas or transit proximity may be included.

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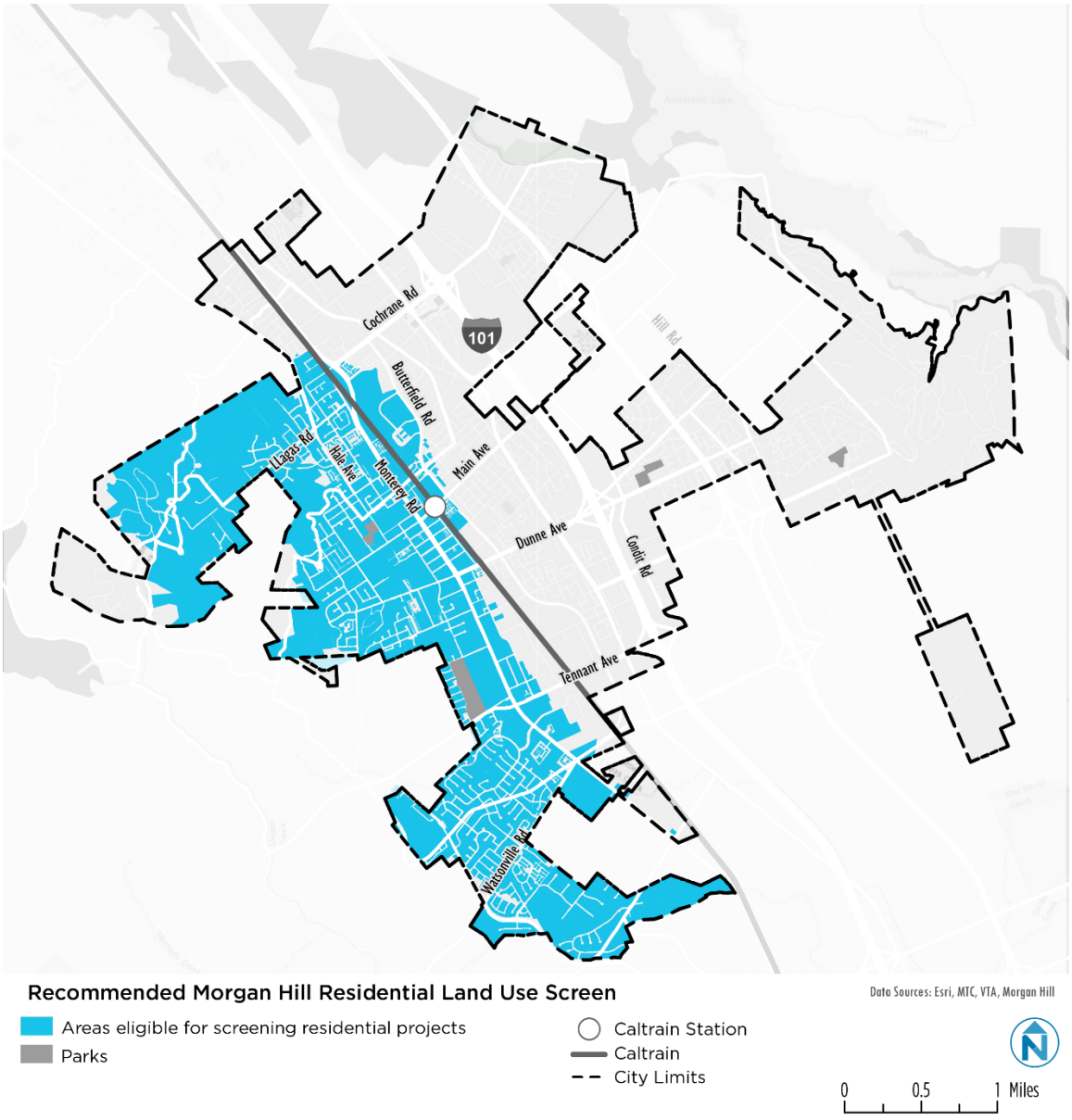
Figure 4 Recommended Morgan Hill Low VMT Residential Land Use Screen



For projects to be presumed to have a less than significant impact and be screened out of further VMT analysis, they must meet minimum criteria to support the presumption. Projects eligible for screening based on their location in the blue zone shown in Figure 4 must meet the following criteria to ensure that the presumption of less than significant impact is warranted:

- **Density.** Minimum of 20 units per acre for residential projects (or maximum allowed if zoned at a lower density). Minimum density is required to ensure that projects result in low VMT.
- **Parking Supply.** Does not propose more vehicle parking than the minimum required. Excess parking supply is associated with induced and higher levels of VMT and should be avoided to ensure low VMT of screened projects.
- **Regional Plans.** Projects must be consistent with *Plan Bay Area* as determined by the lead agency. This is determined by the City with input from MTC/ABAG. The proposed land use

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should be compatible with the regional plan, an example of an incompatible project would be screening a development in area that is identified as open space in *Plan Bay Area*.

- **Displacement**. Projects that replace affordable residential units with a smaller number or higher income residential units cannot be eligible for screening. Removing affordable units can increase the VMT of the former residents.

Transit Proximity Screen – Map Based Screening

In addition to the low VMT areas that already exist due to a complementary mix of land uses, multimodal networks, and walkability, Morgan Hill can create half mile screens around major transit stops or along high-quality transit corridors. A **major transit stop** is defined as a site with an existing rail transit station, a ferry terminal served by bus or rail transit, or the intersection of two or more major bus routes with a frequency of 15 minutes or less during commute periods.[7] A **high-quality transit corridor** is a fixed route bus corridor with service every 15 minutes or better during the peak commute period.[8] Mixed-use, infill development near transit provides new residents and employees with access to transit. Development near transit creates stronger markets for local transit agencies to invest in better transit service over time, further reducing VMT. The area that meets the transit proximity screen requirements is shown in Figure 5.

[7] California Public Resources Code, § 21064.3

[8] California Public Resources Code, § 21155

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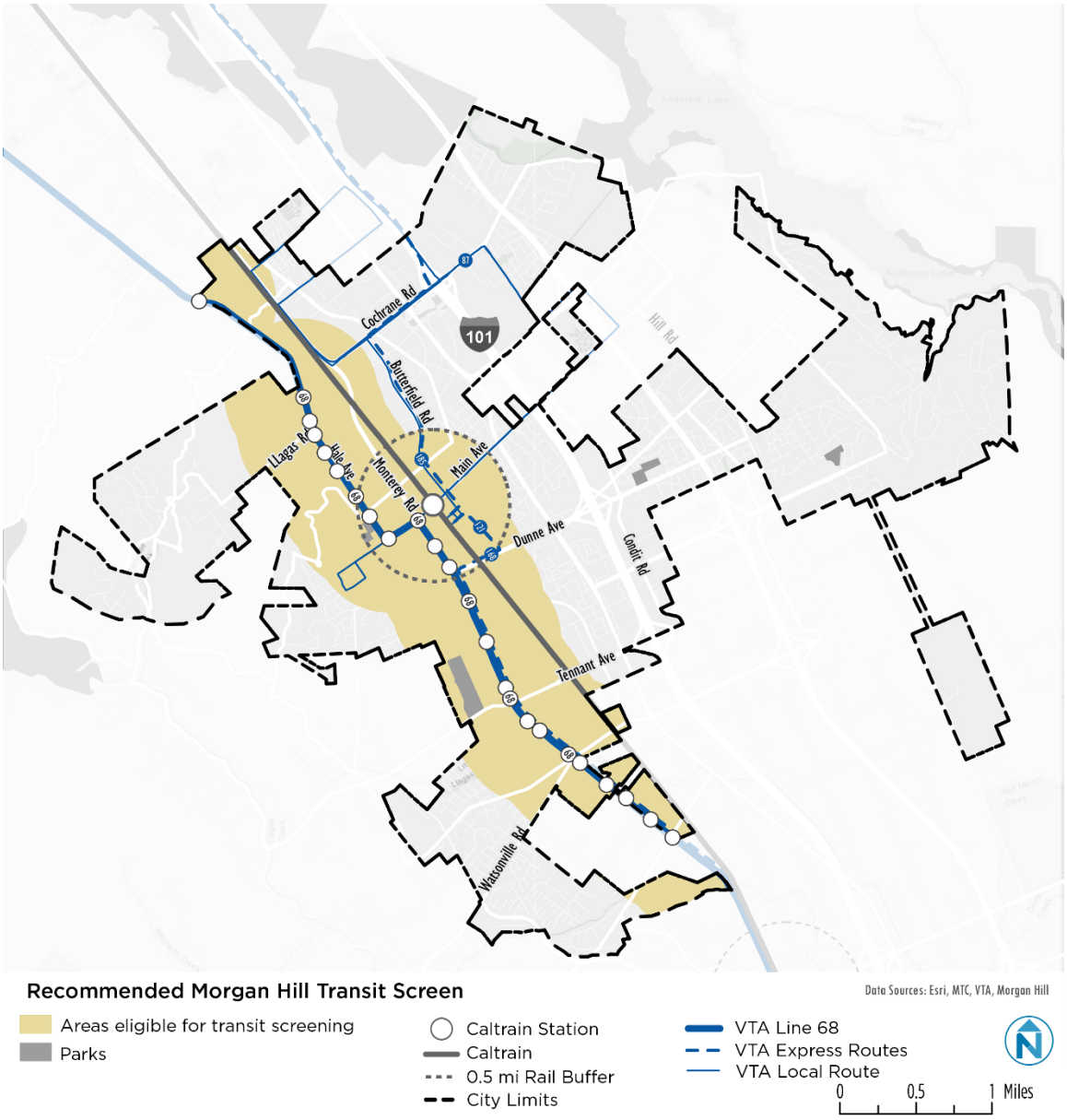
Figure 5 Recommended Transit Proximity Screen



For projects to be presumed to have a less than significant impact and be screened out of the further VMT analysis, they must be located within half mile of eligible transit service (shown in tan in Figure 5) and meet minimum criteria to support the presumption. Residential, employment, retail and other transit-compatible land use projects can be presumed to have a less than significant impact if they are located within a half mile of a major transit stop or high-quality transit corridor *and* meet the baseline criteria presented below:

- **Density.** For residential projects, a minimum of 20 units per acre (or maximum allowed if zoned at a lower density). For commercial or employment land use the minimum density is a FAR of .5 (or maximum allowed if zoned at a lower density). Minimum density is required to ensure that projects are transit supportive and would result in low VMT. The minimum densities recommended by the Nelson\Nygaard team reflect existing land use designations in the Morgan

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Hill General Plan as well as VTA's Transit Sustainability Policy.[9] Projects can propose a higher density than the minimum required as long as the zoning and other plans allow for higher density.

- **Parking Supply.** Does not propose more vehicle parking than the minimum required. Excess parking supply is associated with induced and higher levels of VMT and should be avoided to ensure low VMT of screened projects.
- **Regional Plans.** Projects must be consistent with *Plan Bay Area* as determined by the lead agency. This is determined by the City with input from MTC/ABAG. The proposed land use should be compatible with the regional plan, an example of an incompatible project would be screening a development in area that is identified as open space in *Plan Bay Area*.
- **Displacement**. Projects that replace affordable residential units with a smaller number or higher income residential units cannot be eligible for screening. Removing affordable units can increase the VMT of the former residents.

Caltrain Station Screen

Morgan Hill's Caltrain Station meets the state requirements for screening since it is rail transit and is served by three peak-hour trains per day. Union Pacific owns the railroad tracks used by Caltrain between Morgan Hill and San José and existing agreements allow for transit expansion of up to five trains per peak. Longer term, there is the potential for more Caltrain service with a renegotiation of agreements with Union Pacific as part of the Caltrain Business Plan and High Speed Rail project.

In addition to the train service at the Morgan Hill Caltrain Station, VTA runs express bus routes 121 to Santa Clara and Sunnyvale and 168 to downtown San José. The route 68 bus has stops a block from the Caltrain station, providing frequent transit service to the station area. The Caltrain park-and-ride location also provides a meeting point for carpools, vanpools, and private employer commute buses offered by large regional employers.

Transit Corridor Screen

VTA bus service in Morgan Hill is comprised of express buses (121, 168, 185) operating during commute times, a local route (87), and a frequent route (68). Route 68 runs north to south through Morgan Hill and connects to San José and Gilroy. The 2019 VTA Service Plan identifies existing route 68 service as 15-minute frequency at peak hours and 20-minute frequency off-peak. The proposed frequency upgrade is 15 minute all day frequency.[10] Both the existing and proposed service plan is sufficient to support a transit screen of a half mile from route 68 bus stops.

Affordable Housing Screen

OPR's *Technical Advisory* provides evidence to support a presumption of less than significant impact for 100 percent affordable residential projects in infill locations and suggest lead agencies may develop their own screens based on the amount of affordable housing, local circumstances, and evidence.[11] Multiple studies have found that low income housing generates less VMT per capita than market rate housing and

[9] Valley Transportation Authority Transit Sustainability Policy: 2007, p 9, accessed from: https://nacto.org/wp-content/uploads/2015/04/service_design_guidelines_vta.pdf

[10] Valley Transportation Authority Proposed 2019 New Transit Service Plan, Route 68. Accessed from: http://newtransitplan.vta.org/final-plan-frequent-routes/#68

[11] OPR Technical Advisory, p 15.

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that low-wage workers in particular are more likely to choose a residential location close to their workplace, if one is available.[12]

The following affordability screens meet the presumption of less-than-significant impact standards while also allowing for mixed income development.

- Citywide: Screen 100% affordable
- Below average VMT areas: Screen projects if 80% affordable for very low income (20.2% VMT per capita reduction compared to a market rate project, supporting presumption of less than significant impact)
- Below average VMT areas: Screen projects if 50% affordable for extremely low income (16.3% VMT per capita reduction compared to a market rate project, supporting presumption of less than significant impact)

Additional combinations of affordability levels and VMT reductions are possible, but create too many screens too be useful. Other combinations of affordable housing for various income levels can factor the VMT reduction of affordable housing into their project assessment using the VTA tool. The VTA tool allows developers to gauge the VMT impact of a project in the project design phase where more affordable housing can be included.

VTA's Santa Clara Countywide VMT Evaluation Tool, available for use by projects in the City of Morgan Hill, allows projects to calculate VMT reductions for including affordable housing units as part of a residential project component. These reductions are available to projects that incorporate below market rate housing and provide substantial evidence to support affordable housing screening thresholds. The reductions are shown in Figure 6 and apply to only the below market rate units. For example, a project that includes 10% of the units for affordable to households earning more than 50% and less than 80% of the median family income (MFI) would have a VMT reduction of:

$$10\%\ of\ total\ units * -10.2\%\ VMT\ reduction = 1.02\%\ total\ VMT\ reduction\ for\ the\ project$$

Figure 6 VMT Reductions of Affordable Housing Types

Income Levels	VMT Reduction Compared to Average
Extremely Low Income (Household earns 30% or less MFI)	-32.5%
Very Low Income (Household earns more than 30% less than 50% MFI)	-25.2%
Low Income (Household earns more than 50% less than 80% MFI)	-10.2%

Source: Newmark, G. Haas, P. Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy. The California Housing Partnership. December 2015.

[12] 26 Karner and Benner (2015) Low-wage jobs-housing fit: identifying locations of affordable housing shortages. As cited in the Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.

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4 VMT THRESHOLDS OF SIGNIFICANCE

The City of Morgan Hill has the authority to set thresholds of significance, as the lead agency for land use projects within the City's boundaries. The Governor's Office of Planning and Research (OPR) provides guidance on implementing SB 743 and recommends thresholds of significance for the most common types of land uses. The analysis that informs OPR's recommendations is based on 2017 CARB Scoping Plan, the modeling used to determine State policies and plans for achieving GHG reduction goals. OPR's Technical Advisory provides defensible recommendations backed up by research; however, the guide does not cover all land use types. While deviation from the OPR recommendations may be warranted to address unique land uses and development contexts, such deviations require substantial evidence because they are not backed up by OPR's extensive research. "Substantial evidence" refers to enough relevant information and reasonable inferences from that information that a fair argument can be made to support a conclusion.

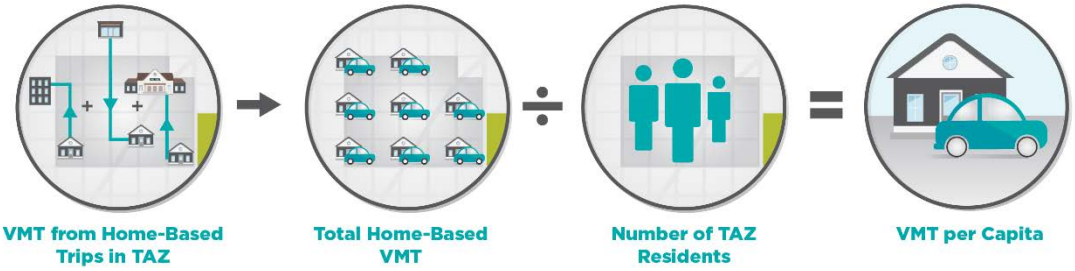
VMT Analysis Metrics

There are three different methods for quantifying VMT that can be applied to different types of land use projects:

VMT per Capita – Residential Land Use

VMT per capita measures the total household VMT from trips that begin or end at a residence (home-based trips) located in a transportation analysis zone (TAZ) divided by the number of residents in that TAZ. Examples of trip types considered in VMT per Capita calculations include home to work trips, school to home trips, and home to store trips. A TAZ's VMT per capita includes all home-based trips that begin or end there, regardless of distance or jurisdiction boundaries (it is not truncated by travel into another jurisdiction) and does not include pass through travel. Figure 7 provides an illustrative overview of the calculation for a TAZ.

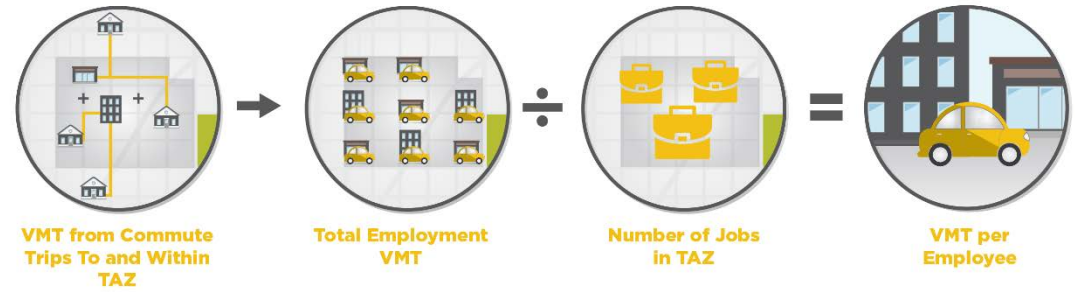
Figure 7 VMT Per Capita Calculation Illustration



VMT per Employee – Employment Land Use

VMT per employee measures the VMT of only the home to work (commute) trip in a TAZ divided by the total number of jobs in that TAZ. A TAZ's VMT per employee is not truncated by travel from another jurisdiction and does not include pass through travel. VTA's travel demand model captures travel from 13 counties to estimate the VMT per job located in Santa Clara County. Figure 8 provides an illustrative overview of the VMT per Employee calculation for an individual TAZ. Heavy duty truck and customer VMT is not included in the VMT per employee calculation.

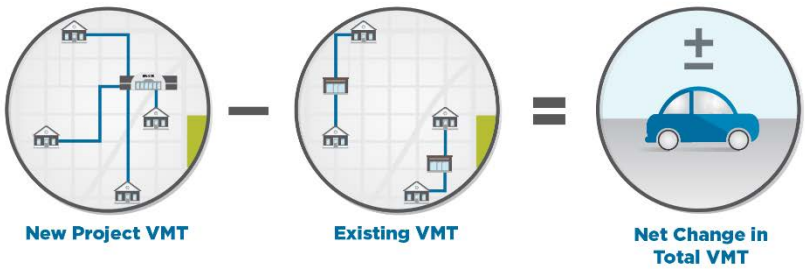
Figure 8 VMT per Employee Calculation Illustration



Net Change in Total VMT – Retail Land Use

Some land uses are evaluated according to the net impact to total regional VMT, rather than the VMT per user. Retail projects, for example, are assessed based on whether or not they contribute to a net increase in VMT for the region. Local-serving retail would be screened out of analysis (see Project Screening section for more detail) so this analysis only applies to regional-serving retail projects such as malls. The total VMT for the region with and without the project is calculated and the difference between the two scenarios is the net change in total VMT that is attributable to the project. Figure 9 provides an illustration of the calculation of net change in total VMT for a new retail project.

Figure 9 Net Change in Total VMT Calculation Illustration



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Recommended Thresholds of Significance

Figure 10 provides a summary of thresholds of significance for the City of Morgan Hill recommended by the Nelson\Nygaard team based on an assessment of state guidance, existing precedence, and a review of the City's General Plan and Economic Development Blueprint. Land uses not included in the table would be assessed on a case by case basis using a methodology approved by the Development Services Director.

Figure 10 Recommended Thresholds of Significance for Land Use Projects

Land use	Recommended Thresholds of Significance	Precedent
Residential	15% below existing average VMT per capita for the City of Morgan Hill	OPR
Employment – Office	15% below existing regional[1] average VMT per employee	OPR
Employment – Industrial	Existing regional average VMT per employee	City of San José
Retail – Regional	Net increase in total regional VMT	OPR
Hospitality/Tourism	Case by case depending on the type of hospitality project	None adopted, other agencies exploring
Medical	Case by case depending on the type of facility	N/A
[1]Santa Clara County is considered the region when analyzing employment land use in Morgan Hill		

When defining the threshold of significance, it is recommended to keep the threshold as a ratio (e.g. 15% below existing City average) rather than identifying the exact number (e.g. 24.16 VMT per capita). The base year (existing) should be defined as the most recent baseline year available in the travel demand model. For the VTA model the baseline year is currently 2015. Defining the threshold as a formula allows the City flexibility to update methodology as needed to use the best available data. The available data may change over time as the VTA and MTC models are updated, or as the City develops other ways to estimate project VMT. The project team recommends that the specific numerical definition of the VMT significance threshold is not defined in the General Plan or in guidelines such as a Transportation Impact Analysis Guidelines document.

Residential Land Use

Transportation impacts of residential land use projects are measured using the estimated daily VMT per capita generated by the new residences. The VMT per capita estimate is based primarily on where the project is located. OPR's *Technical Advisory* recommends using 15% below existing VMT per capita as a threshold of significance. The 15% below existing VMT per capita metric identifies geographic locations within a community a project would have the lowest VMT per capita compared to the rest of that community or region.

Morgan Hill can choose whether the threshold reference average is based on the city or regional average. The Nelson\Nygaard team recommends that Morgan Hill use the city average because it is higher than the regional average, and therefore identifies a wider geographic area within Morgan Hill that falls below the threshold of significance. This supports the land use vision in the General Plan, which identifies opportunities for new development near Downtown, where land use patterns may support mixed use and more residential density. Using the regional average would call for more substantial transportation analysis and VMT mitigation in these areas, which could impede progress in building out the envisioned land use changes called for in the General Plan.

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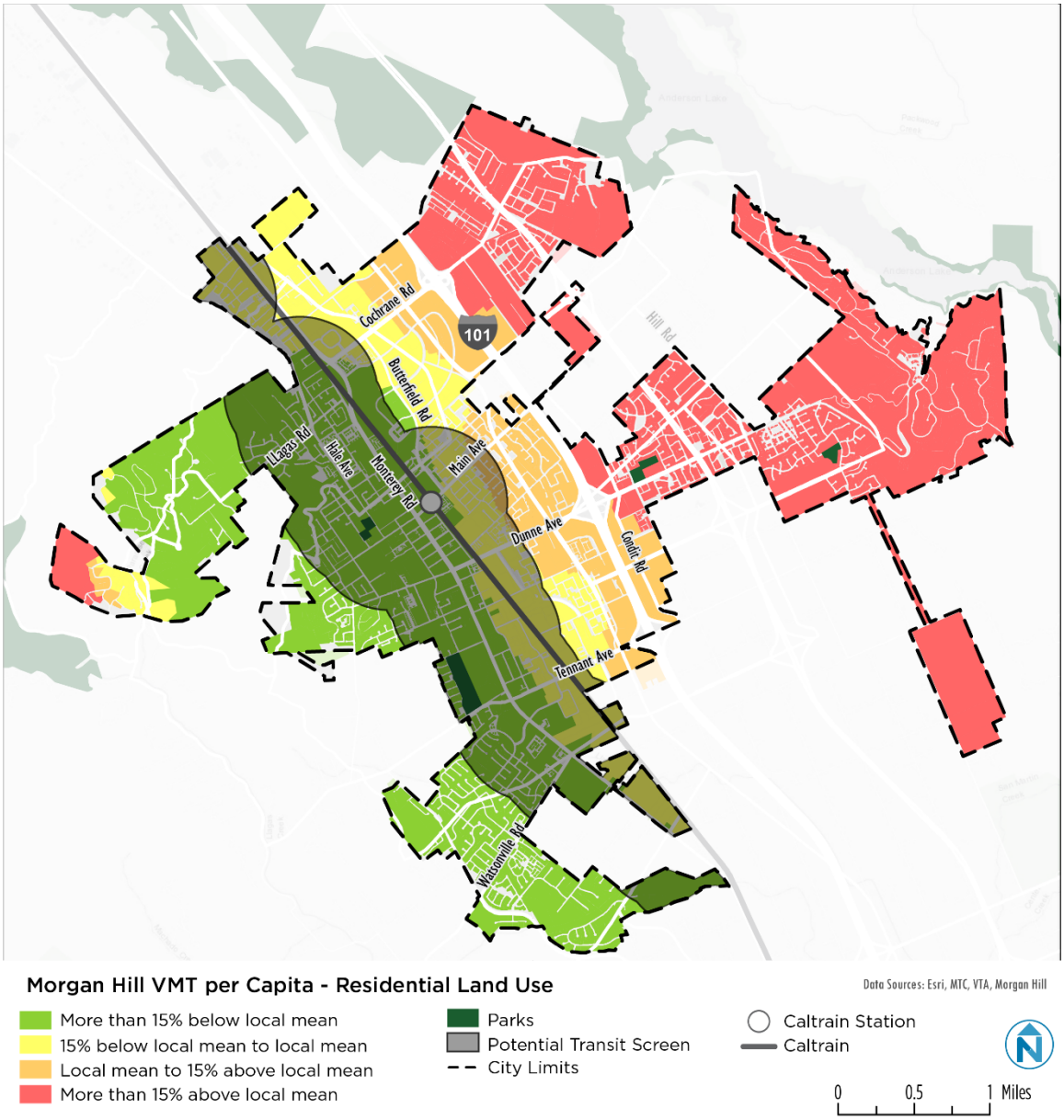
Figure 11 shows VMT per capita compared to the citywide average using VMT data from the VTA Travel Demand Model (TDM). The green areas are below the recommended threshold of significance and eligible for screening (see Project Screening below), the yellow sections are areas that should be straightforward to mitigate, orange shows areas that can be mitigated with a robust TDM plan, and the red shows areas that are challenging to mitigate.

Figure 11 VMT Per Capita Compared to Local Mean



Employment Land Use Projects

Office Land Uses

Transportation impacts of office land use projects are best measured using the estimated daily VMT per employee generated by the new jobs based primarily on where the project is located. OPR's guidance for

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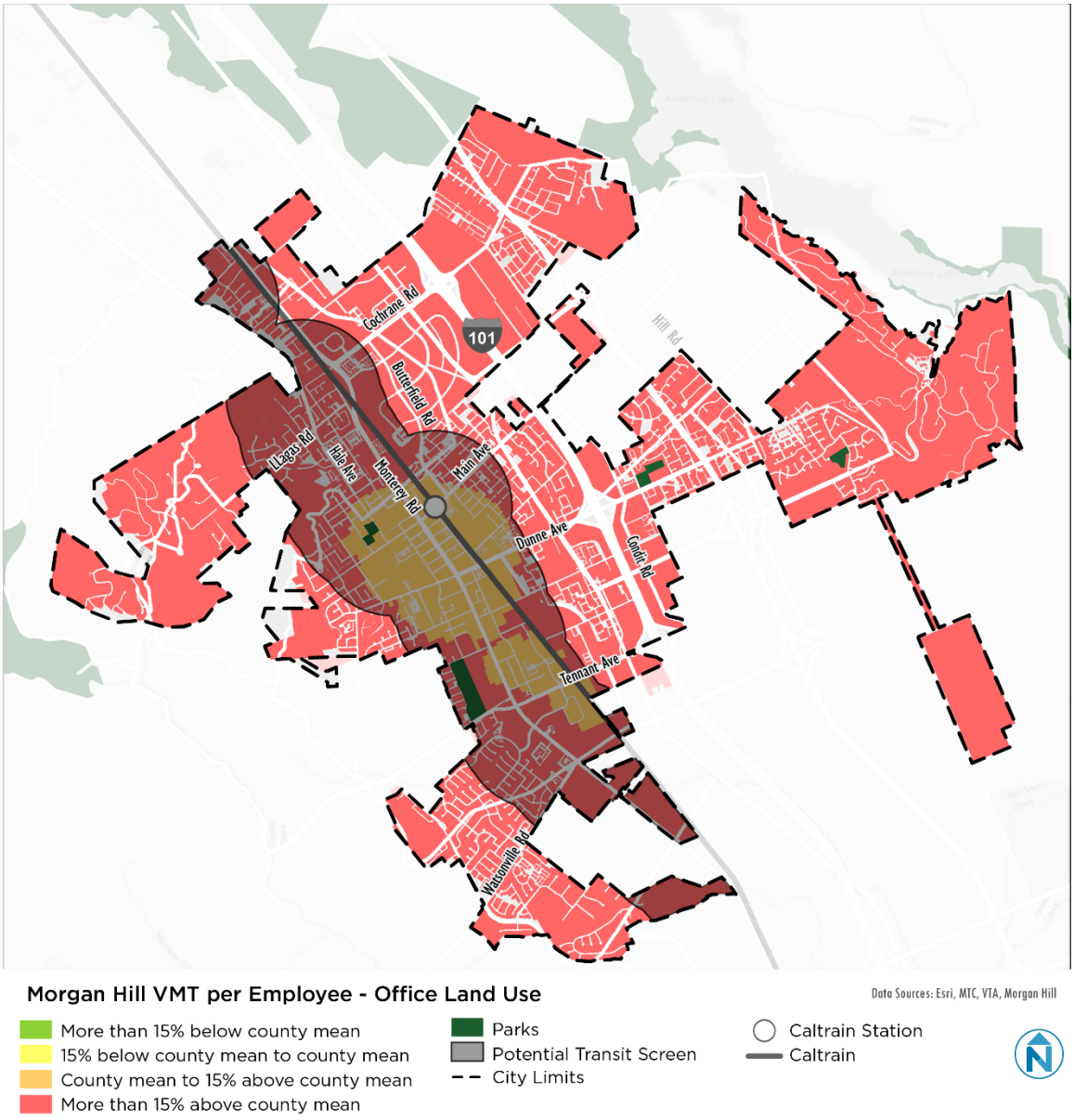
defining the threshold of significance for employment land use is similar to residential but uses VMT per employee rather than VMT per capita. Since home to work trips tend to be regional, the threshold should be based on the regional average, rather than the local Morgan Hill city average. OPR and the Nelson\Nygaard team recommend 15% below regional VMT per employee for office land use.

When establishing the threshold of significance for office projects, the region can be defined as Santa Clara County or the nine county Bay Area. Since Santa Clara County's average VMT per employee is slightly higher than the Bay Area's average, using the County mean is recommended to identify a slightly wider geographic area where office development can be mitigated.

Figure 12 shows the VMT per employee compared to the County's average. Most of the City is red, meaning that the VMT impact would be challenging to mitigate. The orange areas can be mitigated using TDM and other investments in multimodal infrastructure.

Figure 12 VMT per Employee for Office Land Use



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Industrial Land Uses

OPR allows lead agencies to define thresholds of significance and provides guidance for the most common types of land use such as residential and office. The threshold of significance for industrial land use has been defined differently by some lead agencies, including the City of San José. VMT, as defined in OPR's *Technical Advisory*, refers to on-road passenger vehicles, specifically cars and light trucks[13]. Heavy-duty truck VMT is not required as part of the CEQA VMT analysis. Additionally, industrial land use is the least compatible with mixed-use, walkable neighborhoods that tend to have low VMT and are typically not served by high frequency transit. Requiring industrial projects to have the same low VMT as an office project would discourage industrial development, which is a valuable part of the local economy and called for in the General Plan and the Economic Development Blueprint.

To meet City land use and employment goals without increasing VMT, it is recommended that Morgan Hill adopt below the existing regional average VMT per employee as the threshold for industrial land use. This threshold ensures that new industrial development would not increase the VMT per employee in the region. Figure 13 shows VMT per employee compared to the County's average. There are no parts of the City with VMT per employee below the recommended threshold of significance, however, more of the areas zoned for industrial development have VMT per employee that can be mitigated. Areas with industrial or industrial/commercial land use designations in the General Plan are shown as hashed lines.

[13] Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.

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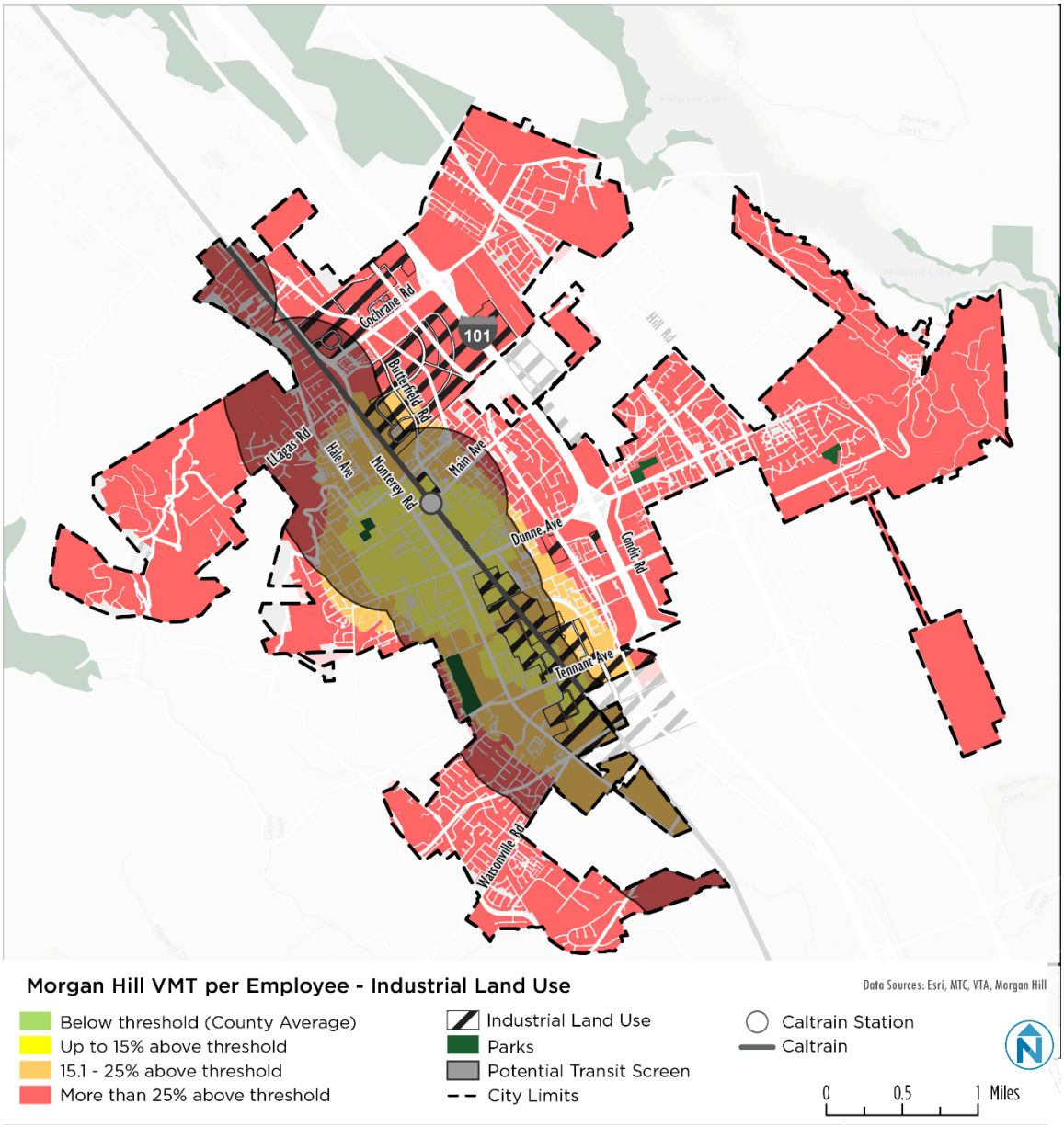
Figure 13 VMT per Employee for Industrial Land Use



Retail Land Use

Commercial and retail land use have a different relationship to VMT than residential or office land uses. Shopping trips are typically redirected from other existing trips rather than newly generated. Therefore, local-serving commercial and retail at smaller scales, close to where people live, results in a decrease in VMT, and can be screened out of further CEQA analysis (see Project Screening).

For larger projects serving the region, the recommended threshold is no net increase in total regional VMT. In contrast to the VMT per capita or VMT per employee this metric is based on the total VMT and can be assessed by running a travel demand model with and without the project. Projects located in travel efficient areas may reduce VMT and have a less-than-significant impact.

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Other Land Uses

Residential, employment, and retail land use projects are the most common types of development projects; however, they do not cover all projects. For other land uses, the Nelson\Nygaard team recommends establishing a process that allows the City to determine the methodology on a project by project basis until additional guidance can be provided by OPR. Other land uses are typically similar to the types of land uses that have defined thresholds and analysis approaches.

Tourism and Hospitality

Tourism and hospitality projects have been assessed on a case by case basis by cities that use VMT metrics for CEQA analysis. VMT from tourism and hospitality projects can be analyzed as VMT per employee or using the retail approach (change in total VMT caused by visitors). Using the VTA's countywide travel demand model to measure event or visitor VMT is not possible since the most relevant travel demand model for Morgan Hill is built and calibrated for typical weekday travel patterns and VMT estimates. The Economic Development Blueprint identifies tourism growth as attracting Bay Area travelers for day and weekend trips and providing an alternative to leaving the Bay Area or traveling to the north Bay Area Counties. If visitors replace a longer leisure trip (e.g. from northern Santa Clara County to Sonoma or Napa) with a shorter trip to Morgan Hill, total VMT would be reduced. In the near-term, the recommendation is to analyze tourism and hospitality projects on a case by case basis given the variations in size and type.

Medical Facilities

Morgan Hill's Economic Development Blueprint identifies healthcare as an industry for growth of both medical services and the diagnostics industry. The VMT generated by a medical facility will vary by type: a patient-serving facility will primarily generate visitor VMT and a research or manufacturing facility will primarily generate employee VMT. Therefore, a laboratory, research facility, or testing facility should be measured based on VMT per employee since employees are the primary travelers to the facility. The impact would be determined using the industrial or office land use threshold.

A patient-serving medical land use project should be measured similarly to retail. Local serving facilities (dentist office, urgent care, etc.) can be screened out and regional serving facilities (major medical center, hospital) may require an EIR to assess the change in total VMT generated by the project. A net increase in total VMT would constitute a significant impact and require mitigation. Given the range of healthcare land use, the Nelson\Nygaard team recommends analyzing on a case by case basis.

Mixed-Uses

To avoid complexity and nonstandard approaches, OPR's *Technical Advisory* recommends evaluating transportation impacts for each use separately for mixed-use. The project screening thresholds can be applied to individual uses. For instance, a large residential project with a leasing office or commercial space smaller than the retail threshold should only be required to analyze the dominant land use: residential.

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