



COMMUNITY DEVELOPMENT DEPARTMENT

Quincy Yaley, AICP
Director

Land Use and Natural Resources – Housing and Community Programs – Environmental Health – Building and Safety – Code Compliance

AGENDA TUOLUMNE COUNTY BOARD OF SUPERVISORS PLANNING COMMITTEE COUNTY ADMINISTRATION CENTER 2 SOUTH GREEN STREET, FOURTH FLOOR BOARD OF SUPERVISORS CHAMBERS

June 18, 2020
1:30 p.m.

48 Yaney Avenue, Sonora
Mailing: 2 S. Green Street
Sonora, CA 95370
(209) 533-5633
(209) 533-5616 (Fax)
(209) 533-5909 (Fax – EHD)
www.tuolumnecounty.ca.gov

IMPORTANT PUBLIC NOTICE: Under the Governor's Executive Order N-25-20, this meeting will allow members of the Planning Committee to participate by teleconference; and under Order N-29-20, Accessibility Requirements, if you need swift special assistance during the Planning Committee meeting, please call 209-770-5423.

PUBLIC PARTICIPATION PROCEDURES

In order to protect public health and the safety of Tuolumne County citizens, Board of Supervisors Planning Committee Meeting will be physically closed to the public. Public Comment will be opened and closed individually for each agenda item listed below, excluding Reports. To observe or participate in the June 18, 2020 Planning Committee meeting, follow the instructions below. For detailed Zoom instructions go to the Agenda Packet <https://www.tuolumnecounty.ca.gov/136/Board-of-Supervisors-Planning-Committee>

- 1) Use link to join webinar: <https://us02web.zoom.us/j/85942139523> (Webinar ID: 859 4213 9523)
- 2) During the public comment period you will have the option to "raise your hand" if you would like to comment on a project or during the public comment portion of the meeting.

If participating by computer:

- After clicking the "raise your hand" option, please wait until a staff member unmutes your microphone.
- Once staff has unmuted your microphone you will be asked to provide comments.
- A staff member will notify to you when you have 30 seconds remaining and again when your time is up.
- Once your allotted time is up, a staff member will mute your microphone and "lower your hand".

If participating by smartphone:

- If you are participating from your smartphone, you will also have a "raise your hand" feature.
- When you are unmuted a prompt will appear to confirm you would like to be unmuted.
- Once you confirm you will be able to provide public comment. Staff will assist as described above.

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- If you are participating via telephone call, you will need to press *9 (star 9) to "raise your hand", and when you are unmuted you will hear "you are unmuted" allowing you to provide public comment. Staff will assist as described above.

You also may submit written comments by U.S. mail at 2 South Green Street, Sonora, CA 95370 or email (communityresources@tuolumnecounty.ca.gov) for retention as part of the administrative record. Comments will not be read during the meeting. Comments must be received by the Community Development Department no later than 9:00 AM on the morning of the noticed meeting.

1. PUBLIC FORUM

The public may speak on any item not on the printed agenda. No action may be taken by the Committee. The amount of time allocated for the public forum is limited to 15 minutes.

2. PLANNING COMMITTEE BUSINESS

- A. Consideration of the Minutes of the meeting of May 21, 2020
- B. Reports – Staff and Committee Members

3. NEW ITEMS

- A. Presentation on SB743 – Vehicle Miles Traveled Traffic Analysis

Adjournment

* The Board of Supervisors Planning Committee serves as an advisory group to the Board of Supervisors for reviewing, commenting on and recommending new and/or modifications to existing policy related to land use and development regulations. In conducting its work, the Committee is to attempt to balance the needs of the individual with the needs of all county residents by encouraging economic growth and promoting the stewardship of the county's natural resources and cultural heritage.

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Community Development Department at (209) 533-5633. Notification 48 hours prior to the meeting will enable the County to make reasonable arrangements to ensure accessibility to this meeting (28CFR Part 35 ADA Title II).



COMMUNITY DEVELOPMENT DEPARTMENT

Quincy Yaley, AICP
Director

Land Use and Natural Resources – Housing and Community Programs – Environmental Health – Building and Safety – Code Compliance

May 15, 2020

TO: Board of Supervisors Planning Committee

FROM: Quincy Yaley, AICP Community Development Department Director

RE: Zoom Video and Teleconference for BOSPC Meetings

48 Yaney Avenue, Sonora
Mailing: 2 S. Green Street
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In response to increasing risks of exposure to the coronavirus (COVID-19), the Tuolumne County BOS Planning Committee meeting will be conducted and participated via Zoom. Video conferencing via Zoom will allow the Committee and County to adhere to social distancing requirements of the Brown Act and provide a way for the public to provide public comment live during the meeting. The Chair of the meeting will set the time length public comment at each item. You are not required to identify yourself in order to provide comments during the meeting.

Below is the Zoom link and Webinar ID needed to participate or observe the meeting:

- Click the link to join the webinar: <https://us02web.zoom.us/j/85942139523>
- Meeting ID: 859 4213 9523

Or iPhone one-tap :

US: +16699006833,,85942139523# or +13462487799,,85942139523#

Or Telephone:

Dial(for higher quality, dial a number based on your current location):

US: +1 669 900 6833 or +1 346 248 7799 or +1 253 215 8782 or +1 301 715 8592 or +1 312 626 6799 or +1 929 205 6099

The public can view the meeting from their smartphone, on their computer browser, or listen on their telephone. Zoom does not require an account to attend the meeting, but if the public wishes to create one, their basic accounts are free.

It is possible that a delay may occur from the time the Chair calls for public comment on a project and when County staff can connect them into the Zoom meeting. The Chair will pause for 60-90 seconds after calling for public comment to allow for any connections to occur. If there are no individuals in the queue for commenting on a specific item, after 90 seconds has elapsed county staff will notify the Chair that there is no public comment.

Members of the public can also choose to watch the meeting and do not have to comment during the meeting. If a member of the public does not want to provide public comment live, they can provide public comment prior to the meeting via email to the Community Development Department Director at communityresources@tuolumnecounty.ca.gov. If you would like your comments to be included in the record, please send comments to the above email address by 9:00 a.m. of the day of the noticed meeting.

If anyone is having technical difficulties with Zoom, they can visit Zoom's support page for helpful tips: <https://support.zoom.us/hc/en-us/categories/201146643>.

Below are step by step instructions on how to join and interact as an attendee via Zoom.

JOINING A WEBINAR BY LINK

- To join the webinar, click the link that we provided above <https://us02web.zoom.us/j/85942139523>
- If you are signed in, change your name if you do not want your default name to appear.
- If you are not signed in, enter a display name.

MANUALLY JOINING A WEBINAR

- Use the 9-digit meeting ID/webinar ID: 859 4213 9523
- Sign in to the Zoom Desktop or Mobile App
- Click or tap **Join a Meeting**
- Enter the 9-digit webinar ID, and click **Join** or tap **Join Meeting**
- If prompted, enter your name and email, then click **Join Webinar** or tap **Join**.
- You may change your name if you do not want your default name to appear, as you are not required to state your name.

WAITING FOR HOST TO START THE WEBINAR

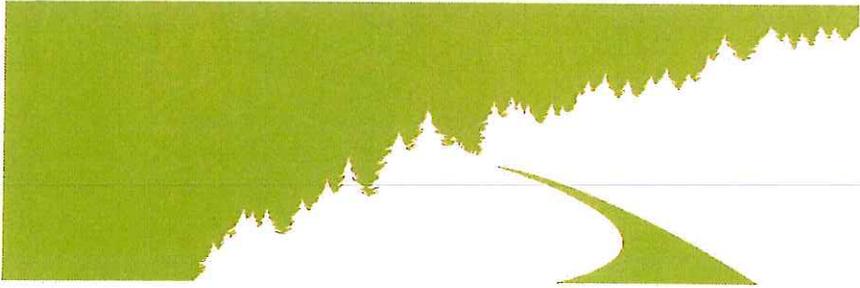
- If the host has not started broadcasting the webinar, you'll receive a message letting you know to "Please wait for the host to start the meeting".

PUBLIC COMMENT

- During the public comment period you will have the option to "raise your hand" if you would like to comment on a proposed project or during the public comment portion of the meeting.
- Once you have clicked the "raise your hand" option, please wait until a staff unmutes your microphone.
- Once staff has unmuted you will have three minutes to speak.
- A staff member will verbally communicate to you and the Commissioners when you have 30 seconds remaining and then when your time is up.
- Once your allotted time is up, a staff member will mute and "lower your hand".
- If you are participating from your smartphone, you will also have a "raise their hand" feature.
- When you are unmuted a prompt will appear to confirm you would like to be unmuted.
- Once you confirm you will be able to provide public comment.
- If you are participating via telephone call, you will need to press *9 (star 9) to "raise their hand", and when you are unmuted you will hear "you are unmuted" allowing you to provide public comment.

END OF MEETING

- If you would like to leave the meeting before it ends, click **Leave meeting**. If you leave, you can rejoin if the webinar is still in progress, as long as the host has not locked the webinar.



Michael Ayala
Chairman

Darin Grossi
Executive Director

TUOLUMNE COUNTY TRANSPORTATION COUNCIL

June 8, 2020

Board of Supervisors Planning Committee
Tuolumne County
2 Green Street
Sonora, CA 95370

Subject: SB 743 CEQA Reform Vehicle Mile Travelled Thresholds of Significance

Dear Committee Members,

Senate Bill (SB) 743 was signed into law in September of 2013 changing the way transportation impacts are analyzed. SB 743 stated that Level of Service (LOS) can no longer be used to determine the significance of transportation impacts of projects on the environment for California Environmental Quality Act (CEQA) purposes. The adopted CEQA Guidelines from the Office of Planning and Research (OPR) approved using Vehicle Miles Traveled (VMT) as the metric to evaluate transportation impacts for CEQA. Beginning July 1, 2020, all projects subject to CEQA review will be required to use VMT metric for analyzing transportation impacts.

In February 2020 staff presented an informational study item on the CEQA reform resulting from Senate Bill 743-Vehicle Miles Traveled (VMT) and the TCTC implementation program to address CEQA reform. As you may recall, SB 743 requires CEQA analyze project impacts on VMT rather than traffic delay (level of service) and congestion. One of our main goals for the TCTC is to establish VMT estimates by land use, traffic study methodology, thresholds of significance, and measures for mitigating VMT impacts consistent with the CEQA and OPR Guidelines. While the TCTC has taken the lead on the technical aspect of the VMT Study, the implementation of CEQA reform will require the Board of Supervisors to make decisions so that project CEQA documents can be approved consistent with the new requirements.

The CEQA guidelines encourages public agencies to establish thresholds of significance for determining VMT impacts. Public agencies have the power to establish their own thresholds. The OPR recommended Rural Agencies evaluate impacts on a case by case basis and did not recommend any thresholds for Rural Agencies.

Another goal of SB 743 is to help facilitate development that reduces Vehicle Miles Traveled. Reducing VMT in Tuolumne County will require coordination between land use and transportation infrastructure. Some potential strategies to reduce vehicle miles traveled include focusing growth around existing downtowns, main streets, transit stops, and walkable communities. Establishing an easy, streamlined development process for projects that reduce VMT will help make it simpler for developers to build compact, mixed-use development in infill areas.

This study was broken into two phases. The TCTC is using an on-call consultant, Wood Rodgers, Inc., to help produce this Study. Wood Rodgers is a consultant utilized to administer and run the Tuolumne Regional Travel Demand Model (RTDM). Wood Rodgers representatives will be presenting information on the new law, case studies on how other agencies are proceeding and a brief overview of the work completed thus far.

In Phase I, the RTDM was updated to the newest TransCAD Model Version 8. We also updated the RTDM from a 3-step Model to 4-step Model with a full Mode Choice Component. This new Mode Choice Component helped our Model estimate VMT reductions for regional trails, bike/pedestrian transportation improvements, new transit services, and transit service increases. This new RTDM tool will help the TCTC better compete for statewide transportation funding by providing performance measure data often required in grant applications.

The TCTC was awarded a second Caltrans Rural Planning Assistance (RPA) Competitive Grant for Phase II in 2019 for \$130,000. As part of Phase II we are recommending a VMT methodology, setting of thresholds of significance, and screening criteria which are customized for the Tuolumne County region for the City and County to consider adopting.

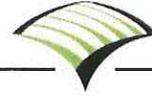
We have utilized a Steering Committee Meeting for SB 743 with the City, County, and Caltrans staff. We received positive feedback on the VMT methodology for establishing thresholds of significance alternative 3. We are excited to review the recommended thresholds of significance with you at your June 15th meeting.

Sincerely,



Darin Grossi
Executive Director

Attachment: May 27, 2020 Memorandum on VMT Thresholds
PowerPoint Presentation on VMT Thresholds



Memorandum

WOOD RODGERS
BUILDING RELATIONSHIPS ONE PROJECT AT A TIME

To: Darin Grossi, Executive Director
Tuolumne County Transportation Council

From: Mario Tambellini, PE, TE
Wood Rodgers, Inc.

Date: May 27, 2020

Subject: **DRAFT Tuolumne County SB 743 VMT Thresholds**
Tuolumne County SB 743 VMT Study Phase 2

INTRODUCTION

This memorandum has been prepared to present recommendations for potential Vehicle Miles Traveled (VMT) thresholds for Tuolumne County (County) and the City of Sonora (City). Thresholds for land use projects, land use plans, and transportation infrastructure projects are discussed. The recommended thresholds are based on information from the current California Environmental Quality Act (CEQA) Guidelines, *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR Technical Advisory) (California Governor's Office of Planning and Research, December 2018), *2018 Tuolumne County General Plan* (Tuolumne County Community Resources Agency, December 2018), *City of Sonora General Plan 2020* (City of Sonora, last revised October 16, 2017), *Tuolumne County Transportation Council 2016 Final Regional Transportation Plan (RTP)* (Tuolumne County Transportation Council, February 2017), region specific analysis prepared for Tuolumne County, and research prepared by other California agencies. All VMT values in this memorandum were calculated using the current version of the Tuolumne County Regional Travel Demand Model (RTDM). This memorandum comprises of the following sections:

1. Background
2. Land Use Projects
 - A. Thresholds
 - B. Relevant General Plan and RTP Goals and Policies
 - C. Screening Criteria
 - D. Example Project Evaluation Process
3. Land Use Plans and Cumulative Impacts
 - A. Thresholds
4. Transportation Projects
 - A. Thresholds
 - B. Screening Criteria

I. BACKGROUND

The CEQA Guidelines state that lead agencies, such as Tuolumne County and the City of Sonora, may establish “thresholds of significance” to assist with the determination of significant impacts of a project. The CEQA Guidelines define a “threshold of significance” as:

“an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.”

The CEQA Guidelines and the OPR Technical Advisory encourage all public agencies to develop and publish thresholds of significance to assist with determining when a project would have significant transportation impacts based on the new metric of VMT. Lead agencies have the discretion to develop and adopt their own thresholds. All thresholds must be developed through a public review process, supported by substantial evidence, and adopted by ordinance, resolution, rule, or regulation. Lead agencies should explain what compliance with an adopted threshold means.

The CEQA Guidelines generally state that projects that decrease VMT can be assumed to have a less than significant transportation impact. The CEQA Guidelines do not provide any specific criteria on how to determine what level of project VMT would be considered a significant impact. This memorandum is intended to assist Tuolumne County and the City of Sonora with development of VMT thresholds for their jurisdictions based on research, analysis, and evidence prepared as part of the Tuolumne County SB 743 VMT Study.

DRAFT

2. LAND USE PROJECTS

A. THRESHOLDS

Residential, Office, and Industrial Employment Projects

The OPR Technical Advisory indicates that it is generally good practice to analyze residential and office land use projects with efficiency-based VMT metrics, such as VMT per capita and VMT per employee. This approach can also be applied to industrial employment projects where the primary vehicle travel is related to employee commute trips. When efficiency-based VMT metrics are used to evaluate a project, efficiency-based thresholds should also be established based on the existing VMT in the area and achievable VMT reduction targets.

Three potential options have been identified for VMT thresholds for residential, office, and industrial employment types of projects. These three options apply to both the City and the County. One option is to follow recommended thresholds provided in the OPR Technical Advisory, while the other options propose thresholds tailored to Tuolumne County and the City of Sonora based on their existing characteristics and long-term planning documents. The City and the County may select the same option, or different options. Generally, other agencies and consultants have found that a lead agency may establish their own thresholds of significance, even if they differ from OPR recommendations, as long as they are based on substantial evidence. Note that for the purposes of this memorandum, "overall region" is defined as the entirety of Tuolumne County, including the City of Sonora.

Option 1 – OPR Recommended Thresholds

The first possible approach for setting thresholds is to stay consistent with current, generalized State recommendations. The OPR Technical Advisory recommends that the threshold for residential projects be set at 15% below the existing VMT per capita of a city or region, and the threshold for office projects be set at 15% below the existing VMT per employee of a region. Following this recommendation, the threshold for industrial employment projects would be set at 15% below the existing VMT per employee of a region as well. The OPR derived these numbers from research that outlined what may be necessary for California to reach its climate goals. However, the 15% reduction in VMT per capita and VMT per employee was based on state-level data, may not be achievable in all locations, and may conflict with City or County general plans.

A year 2040 condition was analyzed in the Tuolumne County RTDM that assumed planned growth in the City of Sonora and unincorporated Tuolumne County consistent with the City of Sonora General Plan and Tuolumne County General Plan, respectively, and construction of all funded transportation improvement projects contained in the RTP. Based on data from this future year model run, it was determined that City of Sonora General Plan based growth (i.e. planned new land uses) in the City of Sonora would have, in aggregate, residential home-based VMT per capita that is approximately 33% below the existing overall region average, and office and industrial home-based-work VMT per employee that is approximately 14.5% below the existing overall region average. Therefore, it may be reasonably achievable for new land uses constructed in the City of Sonora to generate VMT per capita and VMT per employee that is 15% or more below the existing overall region average.

Based on the year 2040 RTDM scenario data, it was also determined that the Tuolumne County General Plan based growth (i.e. planned new land uses) in unincorporated Tuolumne County would have, in aggregate, residential home-based VMT per capita that is approximately 9% below the existing overall region average, and office and industrial home-based-work VMT per employee that is approximately 11% below the existing overall region average. It was also determined that the combined City of Sonora General Plan and Tuolumne County General Plan based growth (i.e. planned new land uses) in the overall region would have, in aggregate, residential home-based VMT per capita that is approximately 11% below the existing overall region average, and office and industrial home-based-work VMT per employee that is approximately 11% below the existing overall region average. Therefore, it may not be reasonably achievable for new land uses in unincorporated Tuolumne County or the overall region to generate VMT per capita and VMT per employee that is 15% or more below the existing overall region average. General pros and cons for Option 1 are shown below.

Option 1 Pros:

- Potentially reasonably achievable in the City of Sonora.
- Consistent with the City's "approved" long-term "VMT growth budget".
- Directly recommended by a state agency.
- Linked to California's established greenhouse gas (GHG) targets.
- Based on research performed for reaching state climate goals.
- Will likely be widely used by lead agencies.
- The strictest of the three options.

Option 1 Cons:

- Not reasonably achievable in unincorporated Tuolumne County and other rural areas.
- Based on general, statewide research that likely primarily focused on urban and suburban settings.
- Inconsistent with the Tuolumne County General Plan and RTP.
- Does not take into account Tuolumne County's Identified Communities or encourage clustered communities.
- Would result in the most significant impacts for new developments of the three options, most of which would be located outside the Sonora area.

Option 2 – General Plan Future Year Growth Based Thresholds

The second possible approach for setting thresholds is to develop thresholds custom to the City of Sonora and unincorporated Tuolumne County based on the currently planned growth for the overall region. Changes in VMT are generally dependent on changes to a region's population and transportation network. Long-term growth in Tuolumne County and the City of Sonora are already guided by the County and City general plans. Similarly, the County's overall transportation network is generally guided by the RTP. The County and City general plans contain a number of policies, such as encouraging clustered development and alternative modes of transportation, that are consistent with the goals of SB 743. Therefore, Tuolumne County and the City of Sonora already have an "approved" long-term growth scenario, with associated VMT, that incorporates an achievable amount of VMT reduction for the region. The amount of VMT generated by land use growth planned in the City and County through year 2040, based on the City and County long-term planning documents, could be viewed as a "VMT growth budget" for the region. This VMT growth budget could be used to establish VMT thresholds for the region.

A year 2040 condition was analyzed in the Tuolumne County RTDM that assumed planned growth in the City of Sonora and unincorporated Tuolumne County consistent with the City of Sonora General Plan and Tuolumne County General Plan, respectively, and construction of all funded transportation improvement projects contained in the RTP. Based on data from this future year model run, it was determined that general plan and RTP based planned growth would result in a reduction of the overall region average residential home-based VMT per capita of 3%, and a reduction of the overall region average office and industrial home-based-work VMT per employee of 1%. These numbers represent the change in the overall region average VMT per capita and VMT per employee, taking both the planned new land uses and existing land uses into account. Based on these numbers, the threshold for residential projects could be set at 3% below the existing VMT per capita of the City, unincorporated County, or overall region, and the threshold for office and industrial employment projects could be set at 1% below the existing VMT per employee of the City, unincorporated County, or overall region. As part of this threshold, residential, office, and industrial employment projects would also be required to be consistent with the City or County general plans. General pros and cons for Option 2 are shown below.

Option 2 Pros:

- Based on data specific to Tuolumne County and City of Sonora.
- Consistent with the City's and County's "approved" long-term "VMT growth budget".
- Promotes a reduction in VMT.
- Reasonably achievable in the City of Sonora and unincorporated Tuolumne County.
- Results in less significant impacts for new developments than Option 1.

Option 2 Cons:

- Does not take into account Tuolumne County's Identified Communities or encourage clustered communities. Inconsistent with planned locations of long-term growth in Tuolumne County General Plan.
- Projected City and County general plan growth becomes your baseline. What do you evaluate the general plans against?
- Data based on a regional travel demand model, which can't account for all types of travel demand management strategies.
- Will this be adequate to help the state achieve statutory goals, including GHG goals?
- Would potentially achieve reduction in the overall region average VMT at a slower rate than Option 1.

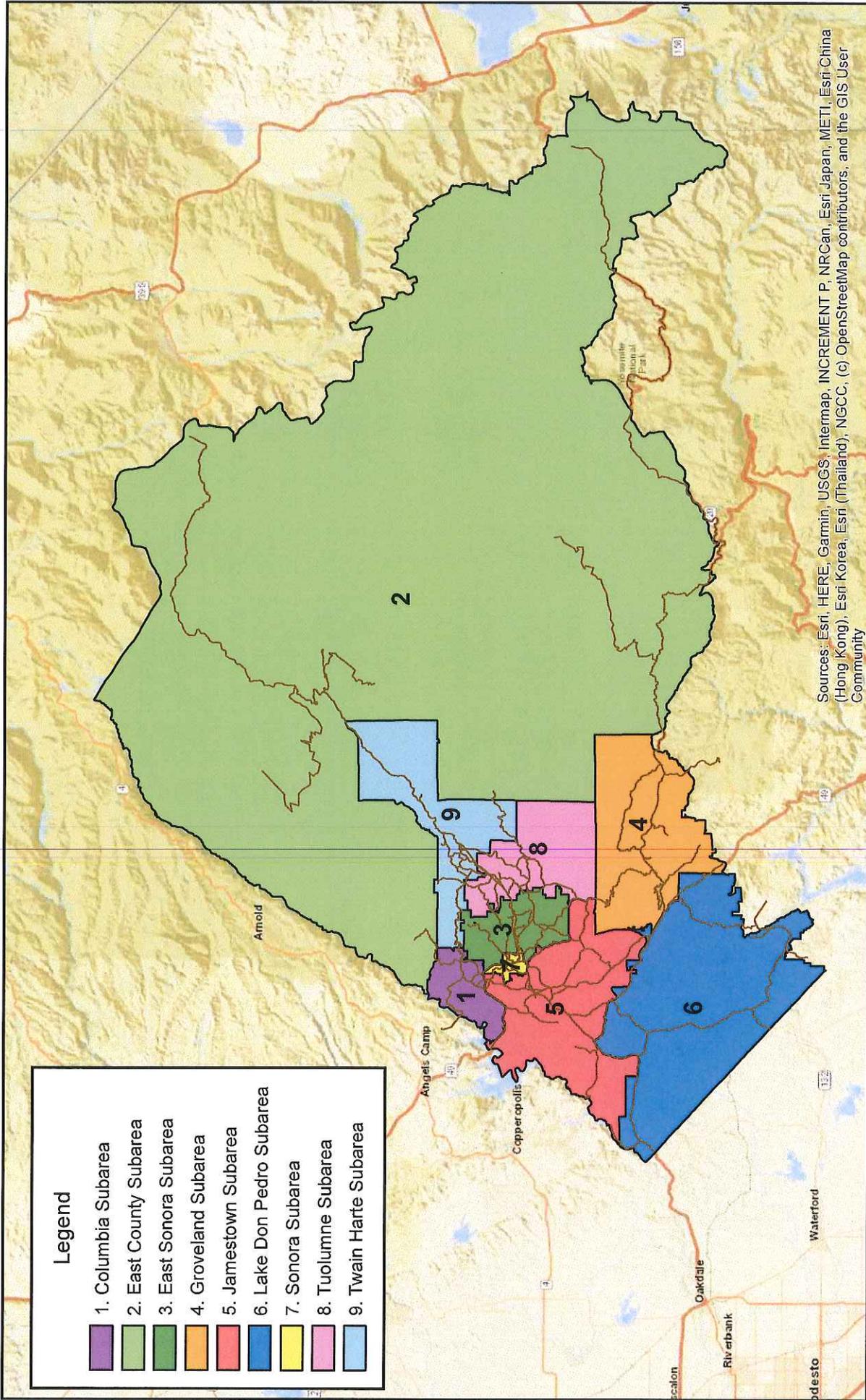
Option 3 – Subarea Baseline Conditions Thresholds

The third possible approach for setting thresholds is to develop thresholds custom to the City of Sonora and unincorporated Tuolumne County based on the currently planned vision for the various regions of the County, taking into account where and when growth is projected to occur. Generally, in CEQA, an impact is viewed as a change to existing or baseline conditions. Therefore, one approach to analyzing project impacts on VMT could be to compare it to baseline conditions. This could be done using efficiency metrics like VMT per capita and VMT per employee, which would mean that proposed projects would be expected to operate no worse than the average for existing similar land uses under baseline conditions. Under this approach, any project with VMT greater than baseline average VMT would be considered to have significant impacts, and any project with VMT less than or equal to baseline average VMT would be considered to have less than significant impacts.

Baseline conditions VMT fluctuates over time as land uses and transportation infrastructure change. Therefore, the efficiency-based average VMT threshold would have to be calculated for the project baseline year, which would typically be the year during which the project's notice of preparation (NOP) was released. This would be done by interpolating between the base year 2015 and future year 2040 Tuolumne County RTDM VMT data, to estimate VMT for the project baseline year. Since the future year 2040 Tuolumne County RTDM scenario is based on planned growth in the City and County general plans, this threshold option is projected to ultimately result in a reduction of the overall region average residential home-based VMT per capita of 3% and a reduction of the overall region average office and industrial home-based-work VMT per employee of 1%, similar to, albeit potentially at a slower pace than, Option 2.

Baseline conditions could be established for the entire county (overall region), or they could be established for subareas of the county. Establishing an overall region baseline would be adequate for encouraging projects that generate below average VMT, but would not acknowledge that different areas of Tuolumne County contain different land use types, transportation infrastructure, and travel patterns. Therefore, it would be more practical to establish baselines for various subareas throughout the County.

Potential subareas have been created for Tuolumne County as part of the SB 743 VMT Study process based on travel characteristics, proximity, geographical features, and the "Identified Communities" identified in the Tuolumne County General Plan. The nine (9) subareas are listed on page 7 and shown in Figure 1.



Legend

1. Columbia Subarea
2. East County Subarea
3. East Sonora Subarea
4. Groveland Subarea
5. Jamestown Subarea
6. Lake Don Pedro Subarea
7. Sonora Subarea
8. Tuolumne Subarea
9. Twain Harte Subarea

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

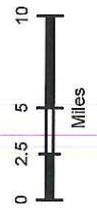
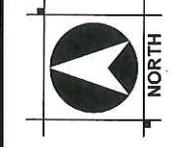


FIGURE 1
TUOLUMNE COUNTY VMT SUBAREAS
 SB 743 STUDY PHASE 2
 TUOLUMNE COUNTY, CA
 MAY 2020



WOOD RODGERS

Tuolumne County Subareas:

1. Columbia Subarea
2. East County Subarea
3. East Sonora Subarea
4. Groveland Subarea
5. Jamestown Subarea
6. Lake Don Pedro Subarea
7. Sonora Subarea
8. Tuolumne Subarea
9. Twain Harte Subarea

Based on the methodologies outlined in Option 3, the threshold for residential projects could be set at less than or equal to baseline VMT per capita of the subarea, and the threshold for office and industrial employment projects could be set at less than or equal to baseline VMT per employee of the subarea. As part of this threshold, residential, office, and industrial employment projects would also be required to be consistent with the City or County general plans.

Existing average VMT per capita and VMT per employee for the overall region, City of Sonora, unincorporated County, and County subareas are shown in Table 1. Baseline average VMT per capita and VMT per employee for years 2020 through 2040 are shown in Attachment A. General pros and cons for Option 3 are shown below.

Option 3 Pros:

- Based on data specific to Tuolumne County and City of Sonora.
- Consistent with the City's and County's "approved" long-term "VMT growth budget".
- Takes into account Tuolumne County's Identified Communities and encourages clustered communities. Consistent with planned locations of long-term growth in Tuolumne County General Plan.
- Promotes a reduction in VMT.
- Reasonably achievable in the City of Sonora and unincorporated Tuolumne County.
- Results in less significant impacts for new developments than Options 1 and 2, especially in communities in unincorporated Tuolumne County.

Option 3 Cons:

- Projected City and County general plan growth becomes your baseline. What do you evaluate the general plans against?
- Data based on a regional travel demand model, which can't account for all types of travel demand management strategies.
- Will this be adequate to help the state achieve statutory goals, including GHG goals?
- Would potentially achieve reduction in the overall region average VMT at a slower rate than Options 1 and 2.

Table 1. Existing Year 2020 Average Residential & Office/Industrial VMT by Area

Area	Residential VMT per Capita	Office/Industrial VMT per Employee
Overall Region	26.3	40.8
City of Sonora	17.6	33.1
Unincorporated County	27.5	44.9
Columbia Subarea	18.5	25.4
East County Subarea	45.5	114.4
East Sonora Subarea	19.0	34.7
Groveland Subarea	32.9	41.6
Jamestown Subarea	22.9	48.5
Lake Don Pedro Subarea	63.6	100.4
Sonora Subarea	17.6	33.1
Tuolumne Subarea	29.0	34.6
Twain Harte Subarea	31.6	46.2

Summary of Options

Table 2 shows a summary of the three threshold options for residential, office, and industrial land use projects.

Table 2. Summary of Residential, Office, and Industrial Threshold Options

Option	Thresholds (A project's impacts would be less than significant if:)
Option 1 – OPR Recommended Thresholds	<p><u>Residential:</u> a project's VMT is 15% or more below regional or city average VMT per capita.</p> <p><u>Office/Industrial:</u> a project's VMT is 15% or more below regional average VMT per employee.</p>
Option 2 – General Plan Based Thresholds	<p><u>Residential:</u> a project's VMT is 3% or more below regional or city average VMT per capita, <u>and</u> the project is consistent with the County/City General Plan and the RTP.</p> <p><u>Office/Industrial:</u> a project's VMT is 1% or more below regional or city average VMT per employee, <u>and</u> the project is consistent with the County/City General Plan and the RTP.</p>
Option 3 – Subarea Baseline Conditions Thresholds	<p><u>Residential:</u> a project's VMT is less than or equal to the subarea average VMT per capita under baseline conditions, <u>and</u> the project is consistent with the County/City General Plan and the RTP.</p> <p><u>Office/Industrial:</u> a project's VMT is less than or equal to the subarea average VMT per employee under baseline conditions, <u>and</u> the project is consistent with the County/City General Plan and the RTP.</p>

Unincorporated Tuolumne County Recommendation

This memorandum recommends Option 3 be used for residential, office, and industrial VMT thresholds in unincorporated Tuolumne County because it is consistent with the County General Plan and the RTP, encourages a reduction in VMT per capita and VMT per employee, and acknowledges the different characteristics of the various areas in Tuolumne County.

Option 1 is not recommended because it is not consistent with the County General Plan and RTP, and is not reasonably achievable in unincorporated Tuolumne County. Option 2 is not recommended because it does not take into account the Tuolumne County General Plan's Identified Communities, and does not encourage development of "clustered communities". According to *Mitigating Vehicle-Miles Traveled (VMT) in Rural Development* (Miller & Ganson, 2015) and the OPR Technical Advisory, development of "clustered communities" could help lower VMT in rural areas.

City of Sonora Recommendation

This memorandum recommends Option 1, utilizing the average VMT for the overall region, be used for residential, office, and industrial VMT thresholds in the City of Sonora because it is consistent with the City of Sonora General Plan, encourages a reduction in VMT per capita and VMT per employee, and is consistent with OPR guidance.

Option 2 and Option 3 are not recommended because they would encourage less development within the City of Sonora than Option 1. Generally, the City of Sonora is a low VMT generating area in the region and encouraging development in the City would help decrease the VMT per capita and VMT per employee of the overall region.

Other Land Use Project Types

The OPR Technical Advisory indicates that it is generally good practice to evaluate retail land use projects by estimating the "total change in VMT" in the project study area. According to the OPR Technical Advisory, this is because new retail development often redistributes existing shopping trips rather than solely creating new trips, and so the effect of the project on the overall region needs to be considered. The OPR Technical Advisory recommends that any increase in regional VMT due to a new retail project could be considered a significant impact. Similar methodologies could be applied to other non-office commercial land uses, such as restaurants and cafes.

Appendix 1 of the OPR Technical Advisory states the following regarding a "total change in VMT" method:

"A third method, estimating the *change in total VMT* with and without the project, can evaluate whether a project is likely to divert existing trips, and what the effect of those diversions will be on total VMT. This method answers the question, 'What is the net effect of the project on area VMT?'"

"The analysis should address the full area over which the project affects travel behavior, even if the effect on travel behavior crosses political boundaries."

Page 17 of the OPR Technical Advisory states evaluating travel patterns of retail projects:

"[Lead agencies] should also consider any project-specific information, such as market studies or economic analyses that might bear on customers' travel behavior."

Based on the above, any "total change in VMT" analysis performed needs to account for diversion of existing trips due to the project, address the full area over which the project affects travel behavior, and consider any available project specific information that could help quantify the project's effects on travel behavior. These three items must be accounted for, to the extent feasible, in order for any "total change in VMT" analysis to be consistent with OPR Technical Advisory guidelines and to be considered valid. A travel demand model, such as the Tuolumne County RTDM, can be used as part of this type of analysis, but may not be able to fully account for diversion of existing trips on its own. RTDM analyses should be supplemented by analysis based on market data, historical origin-destination trip data (e.g. GPS-based data for similar land uses), or separate gravity model analyses, to the extent feasible, in order to fully account for diversion of trips.

Performing a “total change in VMT” analysis can be challenging. Relevant market studies or economic analyses for the project or similar land use types in the study area are not always available. The Tuolumne County RTDM does not account for specialty land use types or land use types with unique trip characteristics, and only accounts for diversion of existing trips from similar land uses at a very high level. Since each project is unique, projects will have to be handled on a case-by-case basis, and any proposed methodologies will have to be approved by the County. When any “total change in VMT” analysis is performed, a good faith effort must be made to use the best data and assumptions available for a project in order to account for diversion of existing trips due to the project.

Hotels and Campgrounds

The OPR Technical Advisory does not provide recommendations on evaluating new land uses such as hotels and campgrounds. However, tourism is an important part of Tuolumne County. Hotels and campgrounds are located in various parts of the County that serve visitors to the historic attractions and local/state/national parks in the region, including the nearby Yosemite National Park, and should be considered.

Hotels and campgrounds could potentially cause a redistribution of existing trips, similar to retail land uses, by providing visitors that would have come to the area anyway with a new place to stay. One possible way of evaluating hotel and campground land use projects would be to treat them similar to retail land use projects and evaluate the effect of the project on the overall region, or a “total change in VMT” approach. Any “total change in VMT” analysis would have to account for diversion of existing trips due to the project. Under this approach, any increase in regional VMT due to a new hotel or campground project could be considered a significant impact (i.e. a “no net increase” approach).

One potential issue with a “no net increase” approach is that unlike retail land uses, hotels and campgrounds are tourist attractions, and newly opened hotels or campgrounds may generate some new tourist trips. This means that most or all new hotels/campgrounds could potentially have an impact if using a “no net increase threshold”. If all new hotels/campgrounds have a transportation impact, the adopted threshold may not adequately serve its purpose of encouraging lower VMT developments. It should be considered that the number of visitors to Yosemite National Park and other similar attractions may generally increase over time regardless of other factors, and those new visitors will be looking for places to stay. If you provide visitors to the region with new places to stay that generate less VMT than existing hotels/campgrounds, you could potentially lower the VMT per visitor of the region over time. Therefore, as an alternative to a “no net increase” threshold, an efficiency-based metric could be developed for evaluating hotels and campgrounds, similar to how residential and office projects are evaluated.

Hotels and campgrounds in different areas of the County serve different purposes and visitors. For example, a hotel in Sonora may be used for a business trip, while a hotel east of Groveland on SR 120 would likely be used for recreational purposes. These different purposes result in significantly different travel patterns by guests. The differences in characteristics of hotels and campgrounds in different areas of the County should be acknowledged. One way of doing this would be to develop subarea thresholds similar to threshold Option 3 for residential and office/industrial land uses discussed in a prior section of this memorandum.

Based on the above discussion, a reasonable alternative VMT threshold for hotel projects could be set at less than or equal to baseline hotel VMT per room of a subarea, and a reasonable alternative threshold for campground projects could be set at less than or equal to baseline campground VMT per site (where “site” is defined as “campsite” or an equivalent) of a subarea. As part of this threshold, hotel and campground projects would also be required to be consistent with zoning in the City or County general plans. The subareas used would be the same subareas defined for the residential/office/industrial threshold Option 3. Average hotel VMT per room and campground VMT per site for the overall region, City of Sonora, unincorporated County, and County subareas, based on data from the RTDM, are shown in Table 3.

Table 3. Existing Average Hotel & Campground VMT by Area

Area	Average Existing Hotel VMT/Room	Average Existing Campground VMT/Site
Overall Region	57.6	44.4
City of Sonora	41.8	n/a
Unincorporated County	63.1	44.4
Columbia Subarea	31.1	15.1
East County Subarea	129.1	48.9
East Sonora Subarea	28.2	n/a
Groveland Subarea	72.0	25.9
Jamestown Subarea	34.8	33.9
Lake Don Pedro Subarea	n/a	43.1
Sonora Subarea	41.8	n/a
Tuolumne Subarea	n/a	n/a
Twain Harte Subarea	61.1	27.6

Baseline conditions change over time. However, the locations and characteristics of future hotel and campground type projects are more difficult to predict than residential, office, and industrial projects. Therefore, the current RTDM can provide a reasonable estimate of existing conditions hotel and campground VMT in the County, but not of overall future year 2040 hotel and campground VMT in the County. Therefore, the existing conditions hotel and campground average subarea VMT could be used as the threshold and updated at regular intervals (potentially alongside regular RTDM updates) in order to account for newly constructed hotels and campgrounds changing the baseline conditions VMT.

Hotel and Campground Threshold Pros and Cons

This section provides general pros and cons of the two proposed hotel and campground thresholds.

“No Net Increase” Threshold Pros:

- Consistent with OPR recommended thresholds for retail projects.

“No Net Increase” Threshold Cons:

- Not reasonably achievable for projects in the City of Sonora and unincorporated Tuolumne County.
- Potentially does not promote development of lower VMT hotels and campgrounds.

“Subarea Baseline” Threshold Pros:

- Based on data specific to Tuolumne County and City of Sonora.
- Reasonably achievable for projects in the City of Sonora and unincorporated Tuolumne County.
- Promotes development of lower VMT hotels and campgrounds.

“Subarea Baseline” Threshold Cons:

- Less strict than a “no net increase” threshold.
- Based on a limited number of existing data points.

Hotel and Campground Threshold Recommendation

This memorandum recommends the “Subarea Baseline” threshold be used for hotel and campground VMT thresholds in unincorporated Tuolumne County and the City of Sonora (as applicable) because it would be a reasonably achievable threshold and would encourage development of lower VMT hotels and campgrounds throughout the region. Using a subarea baseline threshold for hotels in the City of Sonora, instead of a regional baseline, may make sense due to the different purposes hotels serve in different areas of the region.

Other Land Uses Summary

The thresholds shown in Table 4 are recommended for other common land use types. These thresholds are consistent with OPR Technical Advisory recommendations. If a project does not fall into one of the land use categories listed below, and does not meet the screening criteria outlined in the next section, a threshold may be established on a case-by-case basis.

Table 4. Recommended Thresholds for Other Common Land Use Types

Land Use Type	Threshold
Retail/Non-Office Commercial	No net increase in total regional VMT.
Hotel/Campground	No net increase in total regional VMT; or Alternative: Consistent with General Plan and less than or equal to subarea baseline average VMT per room/site.
Mixed-Use	Analyze each land use individually per the relevant thresholds.
Redevelopment	If the redevelopment of an existing site leads to a net overall decrease, or no change in VMT, the project impact would be less than significant. If the redevelopment of an existing site leads to a net overall increase in VMT, the project would be evaluated based on the relevant thresholds as if it were a new project.

B. RELEVANT GENERAL PLAN AND RTP GOALS AND POLICIES

Section 15125, subdivision (d), of the CEQA Guidelines states that project impacts should be evaluated for impacts resulting from inconsistencies with regional plans, including regional transportation plans. Therefore, all projects should be evaluated for consistency with the City and County general plans and the RTP. If a project is inconsistent with the regional plans, it should be determined whether the inconsistency indicates a significant impact on transportation.

The Tuolumne County General Plan and the City of Sonora General Plan are the documents that guide all growth and development in Tuolumne County. The goals and policies in these documents influence all land use decisions in the region, which in turn have a large effect on the future travel patterns, travel modes, and quantities of travel in the County. Table 5 shows some of the Tuolumne County General Plan goals and policies which are important to consider when analyzing a project’s effect on VMT in the County, and which are in line with the goals of SB 743. Table 6 shows some of the City of Sonora General Plan goals and policies which are important to consider when analyzing a project’s effect on VMT in the City, and which are in line with the goals of SB 743.

Table 5. Tuolumne County General Plan Goals and Policies Relevant to VMT

Community Development and Design	
Policy 1.A.4	Focus urban growth in identified communities, emphasizing infill development and the intensified use of existing development.
Policy 1.A.5	Promote infill and clustered patterns of development that facilitate the efficient and timely provision of infrastructure and services.
Policy 1.A.6	Establish growth areas to provide community services and enhance the quality of life by providing for economic, housing and cultural opportunities within identified communities. Where possible, these growth areas should be placed near transit stops, commercial centers, and other services.
Policy 1.A.7	Encourage comprehensively planned and well-balanced, separate, and distinct communities.
Policy 1.A.9	Encourage the clustering of community-oriented services and amenities in and near residential neighborhoods, including schools, branch libraries, open areas and parks and limited neighborhood commercial uses to provide a community center for neighborhoods.
Policy 1.A.10	Establish urban development boundaries within identified communities on the General Plan diagrams to promote the efficient use of infrastructure and services. This will also serve to promote the improvement of infrastructure within the communities to meet standards for infill development, such as fire flow.
Policy 1.A.11	Encourage growth to be dispersed among identified communities rather than concentrated in just one or two areas in the County.
Policy 1.A.14	Encourage a mix of uses in isolated identified communities that minimize the need for nearby residents to travel greater distances to access goods and services.
GOAL 1C	Promote a jobs-housing balance in the County and encourage new communities to be designed to provide a jobs-housing balance.
Policy 1.C.1	Encourage new residential development projects of 100 or more units, except those targeted for seniors or retirees, to be phased to occur with development that will provide for new jobs in the County unless the need for housing dictates otherwise.
GOAL 1D	Encourage development to build facilities that promote the use of alternative transportation systems.
Policy 1.D.1	Encourage pedestrian oriented development to reduce the use of motor vehicles.
Policy 1.D.2	Promote neighborhood commercial development that provides retail stores and service businesses within walking distance of residential areas.
Policy 1.D.3	Encourage urban residential development projects in identified communities to be located within a quarter mile of a transit stop.
Policy 1.D.4	Encourage transit oriented development by providing planning tools, such as design guidelines, and incentives, such as a streamlined permitting process, increased densities or reduced on-site parking requirements.

Policy 1.D.5	Promote the provision of multi-modal access to activity centers such as public facilities, commercial centers and corridors, employment centers, transit stops, schools, parks, recreation areas, and tourist attractions.
Policy 1.D.6	Promote a balance between commercial, industrial, recreational, residential and mixed-use land uses in identified communities to optimize the potential for the use of alternative modes of transportation.
GOAL 1E	Designate adequate land in appropriate areas to accommodate a range of residential densities and amenities to accommodate the housing needs of all income groups residing in Tuolumne County.
Policy 1.E.1	Encourage and promote the development of housing for all income levels.
Policy 1.E.2	Promote affordable housing throughout Tuolumne County.
Policy 1.E.5	Require subdivisions to be designed to provide well-connected internal and external streets and pedestrian facilities, where appropriate.
Housing	
Policy 2.A.4	Encourage residential infill development through flexible development standards in areas of the County where adequate public facilities and services are already in place taking into consideration the visual character of the neighborhood.
GOAL 2B	Encourage and promote the development and rehabilitation of extremely low-, very low-, low-, median-, and moderate-income housing for the residents of Tuolumne County to meet the regional housing need.
Policy 2.B.1	Provide incentives and fee waivers for the construction of extremely low-, very low-, low-, median- and moderate-income housing. Encourage new development to provide housing that is affordable to all segments of the community.
Policy 2.B.6	Facilitate expanded housing opportunities that are affordable to the workforce of Tuolumne County to support economic development and help ensure that workers have the ability to afford housing in the community where they work.
Policy 2.B.7	Encourage and support programs and financing that increase the availability of rental and for-sale housing for extremely low-, very low-, low-, median- and moderate-income households. This includes both new construction and the conversion of market-rate housing to affordable housing through acquisition/rehabilitation as well as rental assistance.
GOAL 2C	Minimize governmental and non-governmental constraints in order to facilitate development of affordable housing in Tuolumne County.
Policy 2.C.1	Minimize and where possible, eliminate governmental constraints that increase the cost of housing.
Policy 2.C.2	Continue to review and revise procedures in an effort to streamline the development process.

Policy 2.C.3	Encourage developers holding existing planning approvals for as yet undeveloped projects located in High Density or Medium Density zoned areas to increase densities. Incentives should be provided, such as a streamlined permitting process or reduced parking requirements, for these revised projects to encourage development.
GOAL 2D	Conserve and improve the existing stock of safe, sanitary and affordable owner occupied and rental housing in Tuolumne County.
Policy 2.D.1	Strive to preserve State and Federally subsidized housing units for extremely low-, very low-, low-, median- and moderate-income households over the useful life of the project.
GOAL 2F	Promote green building design and encourage housing development that is consistent with the County's Healthy Communities Policies.
Policy 2.F.1	Promote land use patterns that encourage energy efficiency. Promote higher density residential development where existing public services are available.
Transportation	
GOAL 4B	Encourage the use of alternative means of transportation by providing safe bicycle and pedestrian facilities within urban development boundary areas and between identified communities thereby reducing road congestion which improves circulation, health and air quality within the County.
Policy 4.B.1	Develop a modern transportation system that incorporates alternative transportation modes into the system design.
Policy 4.B.2	Expand and improve pedestrian sidewalks and facilities focusing on safety, connectivity, and accessibility.
Policy 4.B.3	Expand and improve the bikeways within Tuolumne County, focusing on safety, connectivity, and accessibility.
Policy 4.B.4	Encourage the use of alternative modes of transportation by incorporating public transit, bicycle and pedestrian modes in County transportation planning and by requiring new development to provide adequate pedestrian and bikeway facilities at suitable locations.
Policy 4.B.5	Maintain and expand, where possible and appropriate, the system of non-motorized connections that link neighborhoods to larger roadways, activity centers and nodes, businesses, community services, parks and recreational facilities, and transit stops and stations.
Policy 4.B.6	Actively investigate and seek alternative funding sources for bicycle and pedestrian facilities.
Policy 4.C.4	Encourage effective marketing of all existing transportation services in Tuolumne County to improve awareness of existing services.
Policy 4.C.5	Support the development of medium and high-density housing, commercial and offices along transit routes.
Policy 4.C.6	Support street designs that accommodate transit facilities and operations.

Table 6. City of Sonora General Plan Goals and Policies Relevant to VMT

Land Use Element	
Policy 1.A.3	Ensure that the extent of development shall be related to the property's environmental constraints.
Policy 1.A.4	Protect the public, existing and planned land uses, and the environment from natural and development hazards.
GOAL 1D	Provide for a wide variety of housing types and a high quality living environment for city residents while maintaining and enhancing the city's economic base.
Policy 1.D.1	Promote the intermixing of different types of housing in residential areas and within walking distance of commercial centers to meet the needs of different segments of the population and avoid concentrations of affordable housing.
Policy 1.D.2	Encourage higher density housing in areas served by a full range of urban services, preferably along collector, arterial, and major arterial streets, and within walking distance of shopping areas.
Policy 1.D.3	Recognize the need to supply affordable housing in close proximity to commercial centers to serve the city and county's high number of service-oriented, minimum wage workers.
Policy 1.D.4	Continue to provide a wide variety of housing suitable to all income levels.
Policy 1.E.2	Organize future commercial uses into planned, group concentrations.
Policy 1.E.3	Encourage adaptive renovation and reuse of existing shopping centers as anchor grocery stores recycle, consolidate, or leave.
Policy 1.E.5	Encourage a mixture of uses and activities that will maintain the vitality of the downtown area.
Policy 1.E.6	Promote integrated, rather than scattered, visitor-serving commercial developments.
Policy 1.E.9	Facilitate walking in the historic downtown core area.
GOAL 1.J.	Encourage new development which creates a diverse, walkable, compact, vibrant project with integrated design compatible with the physical characteristics of the property.
Policy 1.J.1	Provide a flexible framework for the development of properties that have unique or unusual characteristics and do not fit into the conventional zoning pattern including vacant land requiring unusually environmentally and aesthetically sensitive development.
Circulation Element	
2.A.5	Promote and encourage pedestrian-oriented development.
GOAL 2.B	Pursue establishment and encourage use of an integrated system of bicycle, pedestrian and other non-motorized transportation routes.

Policy 2.B.1	Support the development and use of non-motorized transportation facilities within the city.
Policy 2.B.2	Encourage the development and use of non-motorized transportation facilities in commercial and multi-family areas.
Policy 2.B.3	Encourage the development and use of non-motorized transportation facilities connecting high-use areas located in close proximity (e.g., schools, commercial centers, residential subdivisions, government centers and similar uses).
Policy 2.B.4	Maintain existing non-motorized transportation facilities.
Policy 2.B.5	Promote and encourage pedestrian-oriented development.
GOAL 2.C	Reduce impacts on the city's roadways and provide a wide variety of alternative methods of transportation for the city's residents and visitors of all income levels.
Policy 2.C.1	Encourage the maintenance and expansion of public transportation opportunities for the citizens of the City of Sonora and Tuolumne County.
Policy 2.C.2	Encourage ride sharing opportunities for city residents and employees working in employment centers within the city.
Policy 2.C.3	Reduce impacts to the city's roadways by encouraging alternative means of transportation.
Policy 2.C.4	Employ land use planning techniques which facilitate the reduction of traffic on city roadways.
Policy 2.C.5	Encourage Transit Oriented Development (TOD) near existing and proposed transit routes and bus stops.
Policy 2.C.6	Pursue transit stop design, locations, and scheduling that encourage safe, clean, and punctual transportation services.
Housing Element (City of Sonora 2014-2019 Housing Element)	
Policy 1.2	Seek, through code enforcement, the private rehabilitation of substandard dwelling units and provide financial assistance, when available, to owners of dwelling units occupied by lower-income households. In applying this policy, the City shall seek to avoid the displacement of lower-income households.
Policy 1.4	Work with for-profit developers and non-profit housing corporations to identify existing affordable housing and develop strategies to maintain its affordability.
Policy 1.5	Continue to pursue available sources of funding for maintaining and expanding the supply of affordable housing for lower and moderate income households, including extremely low income households. This includes both new construction and the conversion of market-rate housing to affordable housing through acquisition / rehabilitation as well as rental assistance.
Policy 1.6	Preserve the existing stock of affordable housing, including (but not limited to) mobile homes and apartments, through City regulations as well as financial and other forms of assistance.

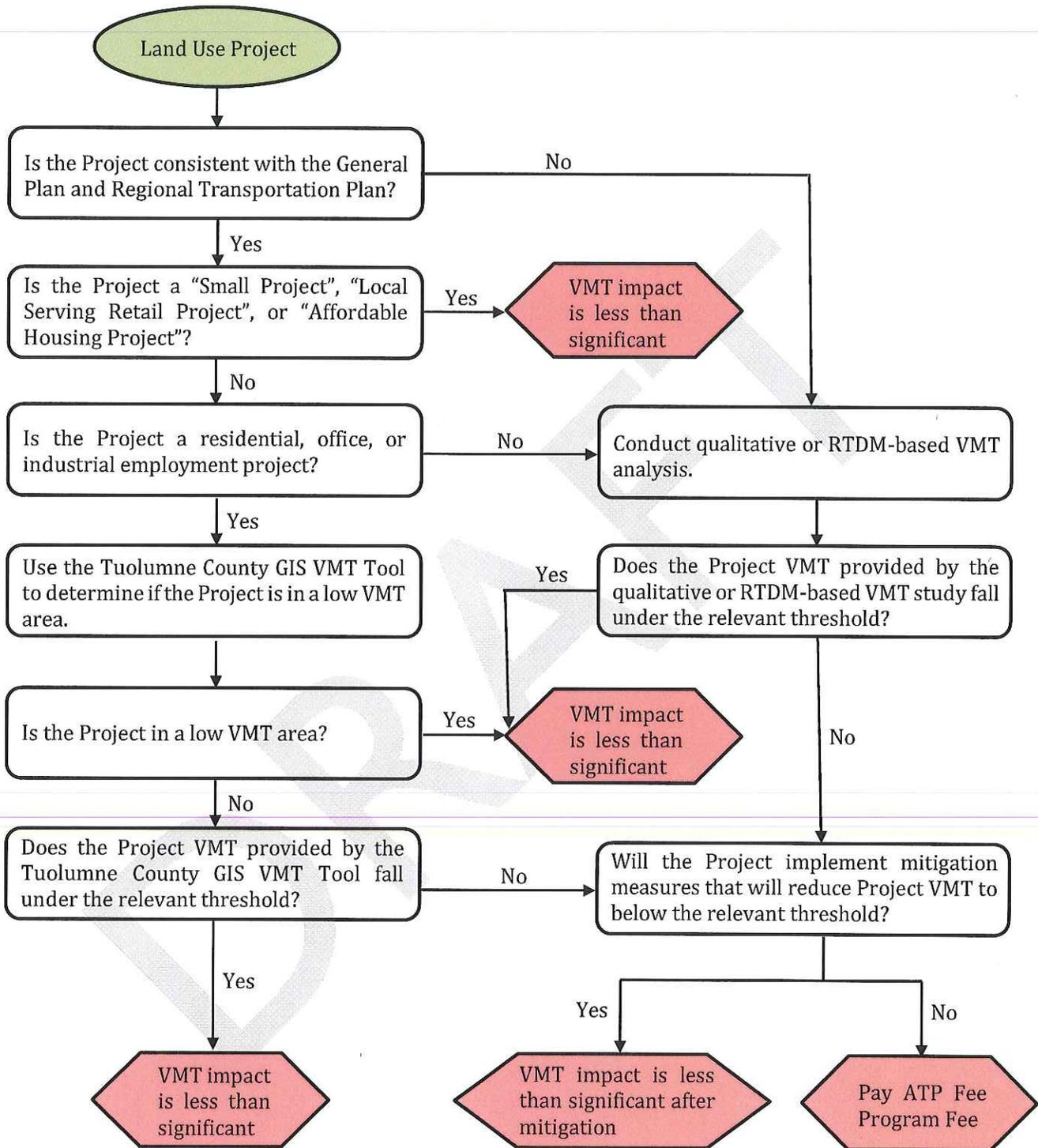
GOAL 2	Facilitate the provision of a range of housing types to meet the diverse needs of the community.
Policy 2.1	Provide quality housing opportunities for current and future residents with a diverse range of income levels.
Policy 2.3	Encourage both the private and public sectors to produce or assist in the production of housing, with particular emphasis on housing affordable to lower income households, including extremely low income households, as well as housing suitable for seniors, large families, single-parent headed households, the homeless, and persons with disabilities.
Policy 2.4	Encourage the provision of housing affordable to extremely low income households when reviewing proposals for new affordable housing developments.
Policy 2.5	Facilitate the provision of second units as a means of providing affordable rental housing opportunities in existing neighborhoods.
Policy 2.6	encourage diversity of unit size and number of bedrooms within housing developments to expand lower cost rental opportunities for large families.
Policy 3.1	Identify vacant parcels and provide to interested developers in conjunction with information on available development incentives. Encourage new development to provide housing that is affordable to all segments of the community.
Policy 3.4	Consider walkability and distance to transportation nodes and public facilities, such as schools, when determining whether land is suitable for multi-family housing development.
Policy 3.5	Continue to work with developers requesting General Plan Amendments converting nonresidential designation to residential uses or from a higher density residential category to a lower density residential category to incorporate affordable housing as a component of the overall development. As an objective, target up to ten percent of the units as affordable, depending on the level of affordability or other amenities provided. Pursue the inclusion of extremely low income units in the negotiated target number of affordable units.
Policy 4.1	Provide regulatory and/or financial incentives, where appropriate, to offset or reduce the costs of affordable housing development, including density bonuses and flexibility in site development standards.
Policy 4.2	Periodically review City regulations, ordinances, departmental processing procedures, and residential fees related to rehabilitation and/or construction to assess their impact on housing costs, and revise as appropriate.
Conservation & Open Space Element	
4.B.2	Continue to promote compact development patterns which reduce automobile use.
4.B.3	Increase the use of non-motorized and public transit to reduce air pollution and energy consumption.

C. SCREENING CRITERIA

According to the OPR Technical Advisory, certain types of projects can be assumed to have less than significant impact on VMT, due to project characteristics or location, without a detailed VMT analysis. If a land use project meets at least one of the screening criteria listed below, the project can be assumed to have a less than significant VMT impact.

1. **Residential, Office, or Industrial Employment Projects Located within a Low VMT Area:** Residential, office, or industrial employment projects located within a low-VMT area as shown in the relevant screening maps shown in Attachment B.
2. **Small Project:** Projects that would generate less than 110 trips per day and are consistent with the County or City general plan.
3. **Local-Serving Retail:** Local-serving retail projects that are 50,000 square feet or less.
4. **Local-Serving Public Facility:** Public facility projects that serve the local community or operate as passive facilities. Public facilities that serve the local community include public K-12 schools, local parks, libraries, post offices, police stations, fire stations, transit centers, and park-and-ride lots. Public facility that operate as passive facilities include utility, communication, water sanitation, and waste management buildings.
5. **Affordable Housing:** Projects that consist of 100% affordable housing and are located in one of the Tuolumne County General Plan's Identified Communities.
6. **Mixed-Use Project:** Each project land use type should be considered separately and compared against the appropriate screening criteria above. It is possible for some land use types in a mixed-use project to be screened out, and other land use types to not be screened out and require additional analysis. The "Small Project" screening criteria should be applied to the portion of the mixed-use project that is not screened out due to other screening criteria.
7. **Redevelopment Project:** Projects that would generate less total VMT than the existing land use they are replacing, unless the project is replacing affordable housing with other land use types.

D. EXAMPLE PROJECT EVALUATION PROCESS



3. LAND USE PLANS AND CUMULATIVE IMPACTS

A. THRESHOLDS

Land Use Plans

The thresholds shown in Table 7 are recommended for all land use plans, including general plans, specific plans, area plans, and community plans. These thresholds are consistent with OPR Technical Advisory recommendations.

Table 7. Recommended Thresholds for Land Use Plans

Land Use Type	Threshold
Residential	Aggregate all residential land uses in the plan and compare the resulting residential VMT per capita for the plan against the threshold established for individual projects.
Office/Industrial	Aggregate all office and industrial employment land uses in the plan and compare the resulting VMT per employee for the plan against the threshold established for individual projects.
Retail/Non-Office Commercial	No net increase in total regional VMT.
Hotel/Campground	No net increase in total regional VMT; or Alternative: Aggregate all hotel or campground land uses in the plan and compare the resulting VMT per room/site for the plan against the threshold established for individual projects.

Cumulative Impacts

The thresholds shown in Table 8 are recommended for evaluation of cumulative conditions impacts for land use projects in Tuolumne County. These thresholds are consistent with OPR Technical Advisory recommendations.

Table 8. Recommended Cumulative Thresholds

Land Use Type	Threshold
Residential, Office, and Industrial	The impacts of these types of land uses are evaluated using efficiency-based metrics (VMT per capita and VMT per employee) and by checking for consistency with the City and County General Plans and RTP. Generally, if a project is found to have less than significant impacts using an efficiency-based metric threshold, and is consistent with the General Plan and RTP, it can be assumed the project would have a less than significant cumulative impact as well. In other words, if a residential, office, or industrial project falls below the thresholds outlined in Table 2, the project would have less than significant cumulative impacts.
Retail/Non-Office Commercial	No net increase in total regional VMT under cumulative conditions.
Hotel/Campground	No net increase in total regional VMT under cumulative conditions; or Alternative: Efficiency-based threshold would apply.

Consistency with the General Plan

If a land use project is consistent with the City or County general plans, and a VMT analysis was performed as part of a general plan environmental impact report, no project-specific cumulative VMT analysis would be required.

4. TRANSPORTATION PROJECTS

A. THRESHOLDS

The thresholds shown in Table 9 are recommended for evaluation of the transportation impacts of transportation projects in Tuolumne County. These thresholds are consistent with OPR Technical Advisory recommendations.

Table 9. Recommended Thresholds for Transportation Projects

Condition	Threshold
Short-Term	No net increase in total regional VMT under baseline conditions.
Long-Term	No net increase in total regional VMT under cumulative conditions.

B. SCREENING CRITERIA

The OPR Technical Advisory indicates that transportation projects that would reduce VMT, or that would not likely lead to a substantial or measureable increase in vehicle travel, would not require additional analysis and could be assumed to have less-than-significant VMT impacts. Types of transportation projects that can be assumed to have a less-than-significant impact on VMT due to their characteristics include, but are not limited to:

- Public transit projects, such as establishing new routes/services/facilities or modifying existing routes/services/facilities.
- Active Transportation Projects, such as bike trails, bike paths, bike lanes, bike routes, sidewalks, Americans with Disabilities Act (ADA) improvements multi-use paths, etc.
- Complete street projects that would not add additional motor vehicle capacity.
- Addition of roadway capacity provided solely for the purpose of improving conditions of pedestrian, bicycle, or transit travel.
- Rehabilitation, maintenance, replacement, safety, or repair projects that do not add additional motor vehicle capacity.
- Safety projects that do not add additional motor vehicle capacity.
- Installation, removal, or reconfiguration of turn lanes or lanes not intended for through travel.
- Installation, removal, or reconfiguration of auxiliary lanes intended to improve safety.
- Projects that add roadway capacity on local or collector streets and substantially improve conditions for pedestrians, bicycles, or transit.
- Addition of a new lane that is permanently restricted for use only by transit vehicles.
- Reduction in number of through lanes.
- Grade separation projects that would separate vehicles from rail, transit, pedestrians, or bicycles.
- Installation, removal, or reconfiguration of traffic control devices (including traffic signals) or wayfinding signage.
- Installation of traffic metering systems, detection systems, cameras or changeable message signs.
- Timing of signals to optimize vehicle, bicycle, or pedestrian flow.
- Installation of roundabouts or traffic circles.

-
- Installation or reconfiguration of traffic calming devices.
 - Conversion of streets from one-way to two-way with no net increase in number of traffic lanes.
 - Removal or relocation of off-street or on-street parking spaces.
 - Adoption of or modification of on-street parking or loading restrictions.
 - Addition of passing lanes, truck climbing lanes, or truck brake-check lanes.
 - Other transportation improvements that do not add motor vehicle capacity.

Note that the OPR Technical Advisory lists additional types of transportation projects that could be assumed to have a less-than-significant impact on VMT.

Consistency with the General Plan

If a transportation project is consistent with the City or County general plans, and a VMT analysis was performed as part of a general plan environmental impact report, no project-specific cumulative VMT analysis would be required.

DRAFT

ATTACHMENT A
Baseline Average VMT for Subareas

DRAFT

Baseline Average Residential VMT per Capita by Subarea

Year	Columbia Subarea	East County Subarea	East Sonora Subarea	Groveland Subarea	Jamestown Subarea	Lake Don Pedro Subarea	Sonora Subarea	Tuolumne Subarea	Twain Harte Subarea
2020	18.5	45.5	19.0	32.9	22.9	63.6	17.6	29.0	31.6
2021	18.6	45.4	18.9	32.9	22.9	63.6	17.6	28.9	31.6
2022	18.6	45.4	18.9	32.9	22.8	63.7	17.6	28.9	31.5
2023	18.6	45.4	18.9	32.8	22.8	63.7	17.6	28.9	31.5
2024	18.6	45.4	18.9	32.8	22.7	63.7	17.6	28.9	31.5
2025	18.6	45.3	18.9	32.8	22.7	63.8	17.6	28.8	31.4
2026	18.6	45.3	18.9	32.7	22.7	63.8	17.6	28.8	31.4
2027	18.6	45.3	18.9	32.7	22.6	63.8	17.6	28.8	31.4
2028	18.6	45.2	18.9	32.6	22.6	63.8	17.6	28.7	31.3
2029	18.6	45.2	18.9	32.6	22.5	63.9	17.6	28.7	31.3
2030	18.6	45.2	18.9	32.6	22.5	63.9	17.6	28.7	31.3
2031	18.6	45.1	18.9	32.5	22.5	63.9	17.6	28.6	31.2
2032	18.6	45.1	18.8	32.5	22.4	64.0	17.6	28.6	31.2
2033	18.6	45.1	18.8	32.5	22.4	64.0	17.6	28.6	31.2
2034	18.6	45.0	18.8	32.4	22.3	64.0	17.6	28.6	31.2
2035	18.7	45.0	18.8	32.4	22.3	64.1	17.6	28.5	31.1
2036	18.7	45.0	18.8	32.3	22.3	64.1	17.6	28.5	31.1
2037	18.7	44.9	18.8	32.3	22.2	64.1	17.6	28.5	31.1
2038	18.7	44.9	18.8	32.3	22.2	64.1	17.6	28.4	31.0
2039	18.7	44.9	18.8	32.2	22.2	64.2	17.6	28.4	31.0
2040	18.7	44.8	18.8	32.2	22.1	64.2	17.6	28.4	31.0

Baseline Average Office/Industrial VMT per Employee by Subarea

Year	Columbia Subarea	East County Subarea	East Sonora Subarea	Groveland Subarea	Jamestown Subarea	Lake Don Pedro Subarea	Sonora Subarea	Tuolumne Subarea	Twain Harte Subarea
2020	25.4	114.4	34.7	41.6	48.5	100.4	33.1	34.6	46.2
2021	25.5	114.6	34.7	41.6	48.3	100.4	33.1	34.6	46.2
2022	25.5	114.9	34.7	41.7	48.1	100.4	33.1	34.6	46.2
2023	25.5	115.2	34.7	41.7	47.9	100.4	33.1	34.6	46.2
2024	25.5	115.5	34.7	41.7	47.7	100.4	33.1	34.6	46.2
2025	25.6	115.7	34.7	41.7	47.5	100.4	33.1	34.6	46.2
2026	25.6	116.0	34.7	41.8	47.3	100.4	33.0	34.6	46.2
2027	25.6	116.3	34.7	41.8	47.1	100.4	33.0	34.6	46.2
2028	25.6	116.5	34.6	41.8	46.9	100.4	33.0	34.6	46.2
2029	25.7	116.8	34.6	41.9	46.7	100.4	33.0	34.6	46.2
2030	25.7	117.1	34.6	41.9	46.5	100.4	33.0	34.6	46.2
2031	25.7	117.3	34.6	41.9	46.3	100.4	33.0	34.6	46.2
2032	25.7	117.6	34.6	41.9	46.0	100.4	33.0	34.6	46.2
2033	25.8	117.9	34.6	42.0	45.8	100.4	33.0	34.6	46.2
2034	25.8	118.2	34.6	42.0	45.6	100.4	33.0	34.6	46.2
2035	25.8	118.4	34.6	42.0	45.4	100.4	33.0	34.6	46.2
2036	25.8	118.7	34.6	42.0	45.2	100.4	33.0	34.5	46.2
2037	25.8	119.0	34.6	42.1	45.0	100.4	33.0	34.5	46.2
2038	25.9	119.2	34.6	42.1	44.8	100.4	33.0	34.5	46.2
2039	25.9	119.5	34.6	42.1	44.6	100.4	33.0	34.5	46.2
2040	25.9	119.8	34.6	42.1	44.4	100.4	33.0	34.5	46.2

ATTACHMENT B
Low-VMT Screening Maps

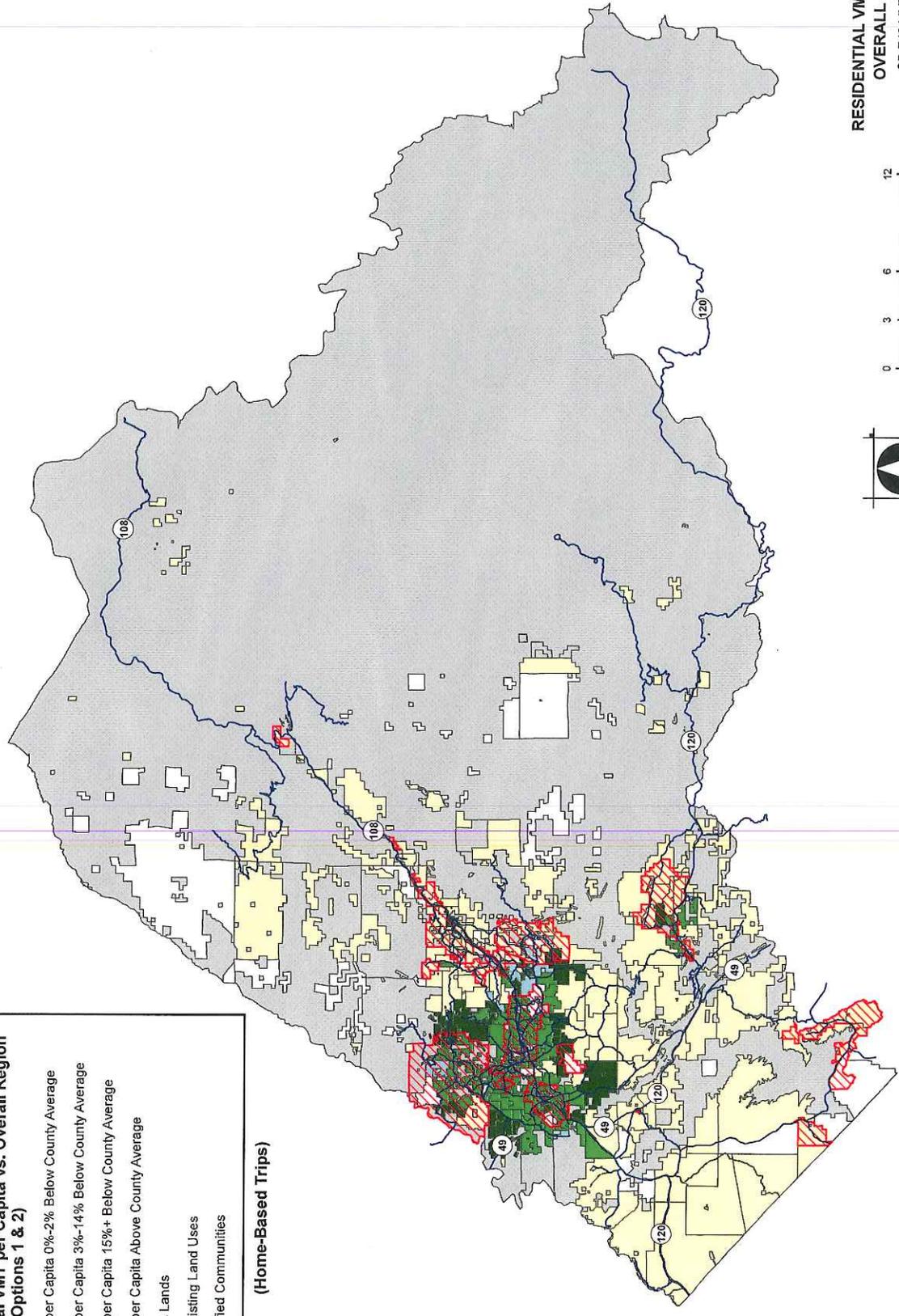
DRAFT

PRELIMINARY

Residential VMT per Capita vs. Overall Region Average (Options 1 & 2)

- Light Blue: VMT per Capita 0%-2% Below County Average
- Dark Green: VMT per Capita 3%-14% Below County Average
- Medium Green: VMT per Capita 15%+ Below County Average
- Yellow: VMT per Capita Above County Average
- Grey: Public Lands
- White: No Existing Land Uses
- Red Hatched: Identified Communities

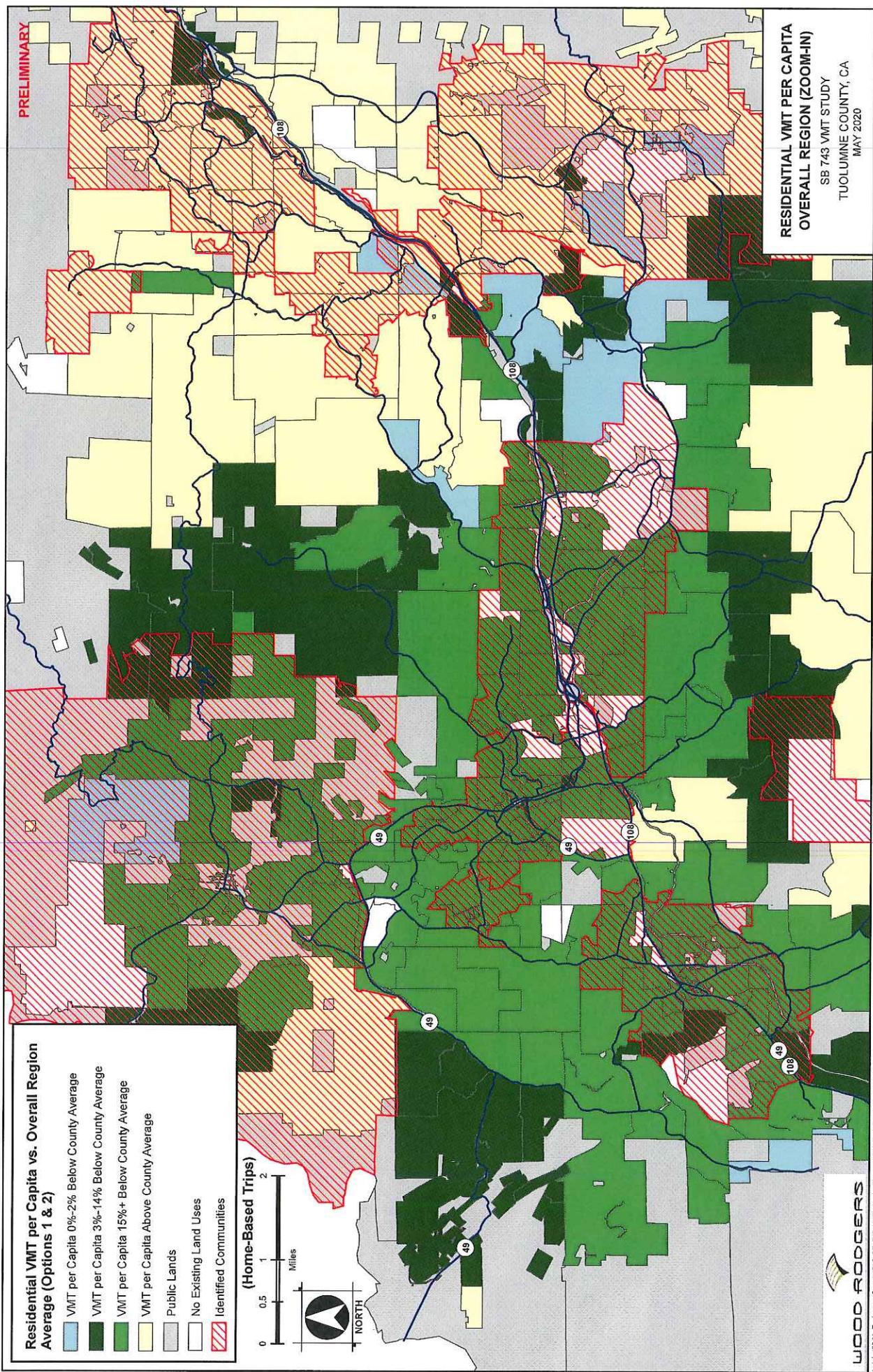
(Home-Based Trips)



**RESIDENTIAL VMT PER CAPITA
OVERALL REGION**
SB 743 VMT STUDY
TUOLUMNE COUNTY, CA
MAY 2020

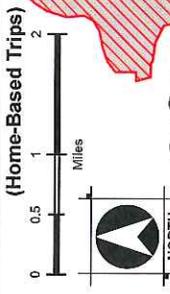


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Residential VMT per Capita vs. Overall Region Average (Options 1 & 2)

- VMT per Capita 0%-2% Below County Average
- VMT per Capita 3%-14% Below County Average
- VMT per Capita 15%+ Below County Average
- VMT per Capita Above County Average
- Public Lands
- No Existing Land Uses
- Identified Communities



**RESIDENTIAL VMT PER CAPITA
OVERALL REGION (ZOOM-IN)**
SB 743 VMT STUDY
TUOLUMNE COUNTY, CA
MAY 2020



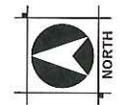
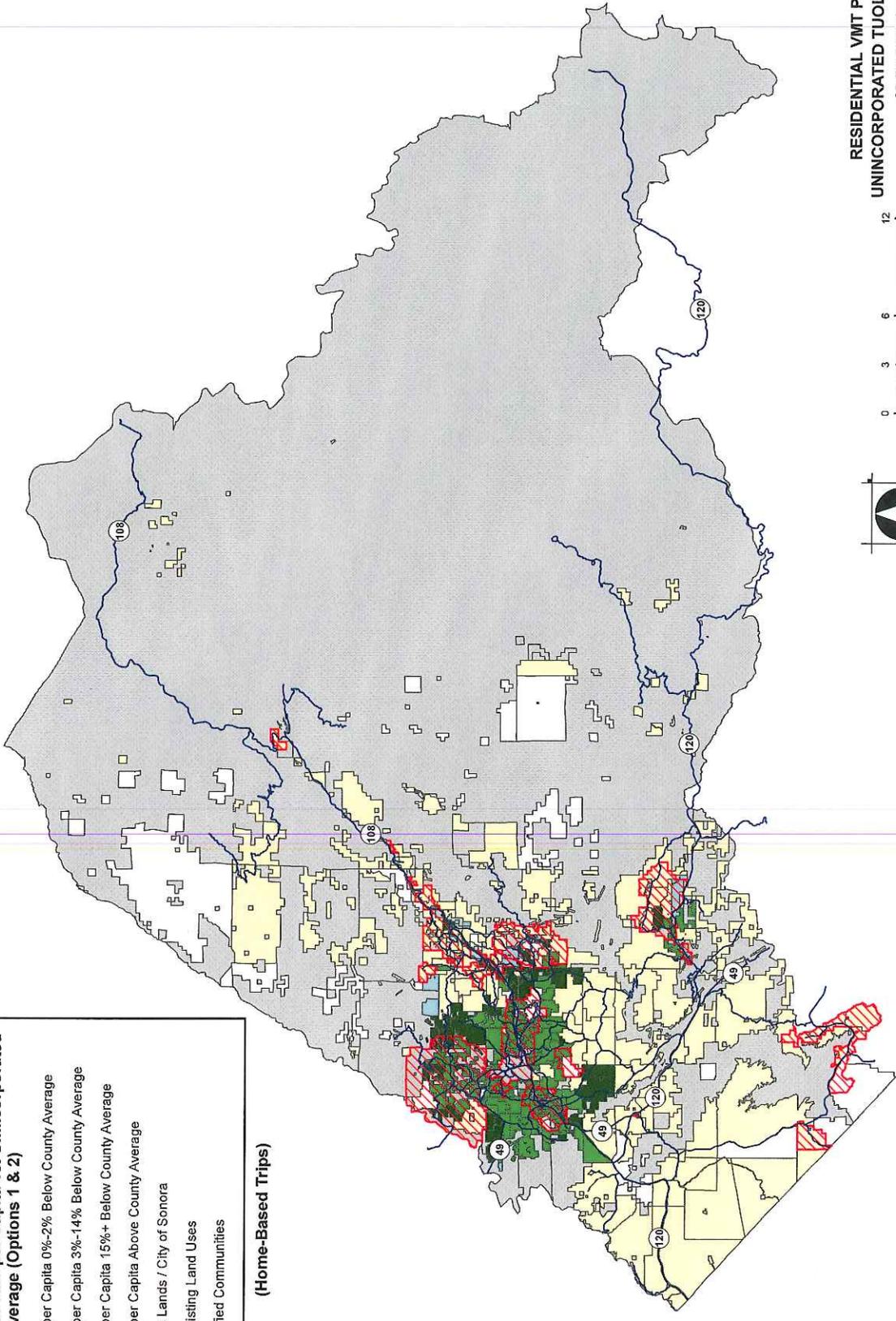
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PRELIMINARY

Residential VMT per Capita vs. Unincorporated County Average (Options 1 & 2)

- VMT per Capita 0%-2% Below County Average
- VMT per Capita 3%-14% Below County Average
- VMT per Capita 15%+ Below County Average
- VMT per Capita Above County Average
- Public Lands / City of Sonora
- No Existing Land Uses
- Identified Communities

(Home-Based Trips)



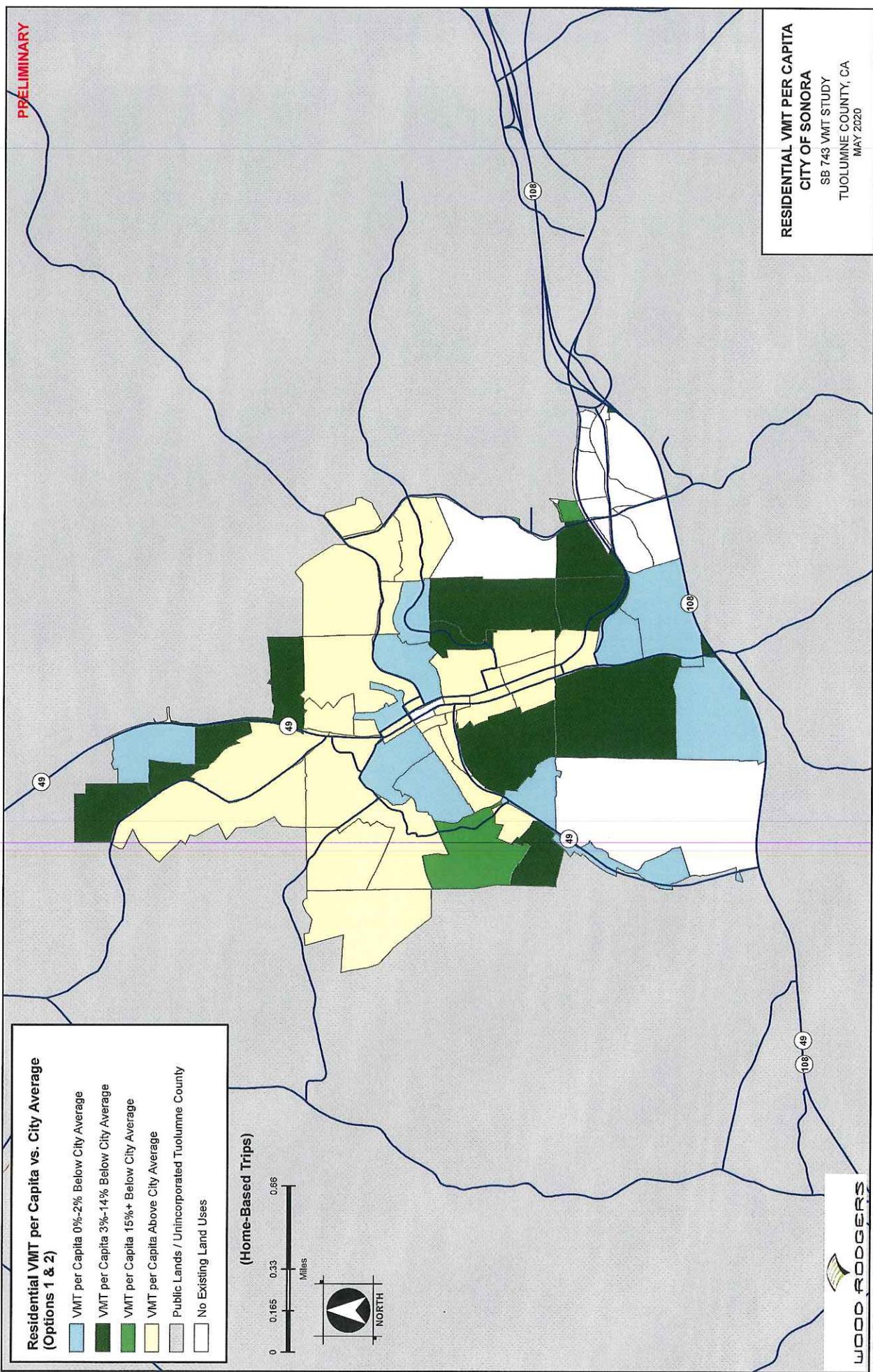
RESIDENTIAL VMT PER CAPITA
UNINCORPORATED TUOLUMNE COUNTY
SB 743 VMT STUDY
TUOLUMNE COUNTY, CA
MAY 2020



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PRELIMINARY

RESIDENTIAL VMT PER CAPITA
CITY OF SONORA
SB 743 VMT STUDY
TUOLUMNE COUNTY, CA
MAY 2020



Residential VMT per Capita vs. City Average (Options 1 & 2)

- Light Blue: VMT per Capita 0%-2% Below City Average
- Dark Green: VMT per Capita 3%-14% Below City Average
- Medium Green: VMT per Capita 15%+ Below City Average
- Yellow: VMT per Capita Above City Average
- Grey: Public Lands / Unincorporated Tuolumne County
- White: No Existing Land Uses

(Home-Based Trips)

0 0.165 0.33 0.66 Miles

NORTH



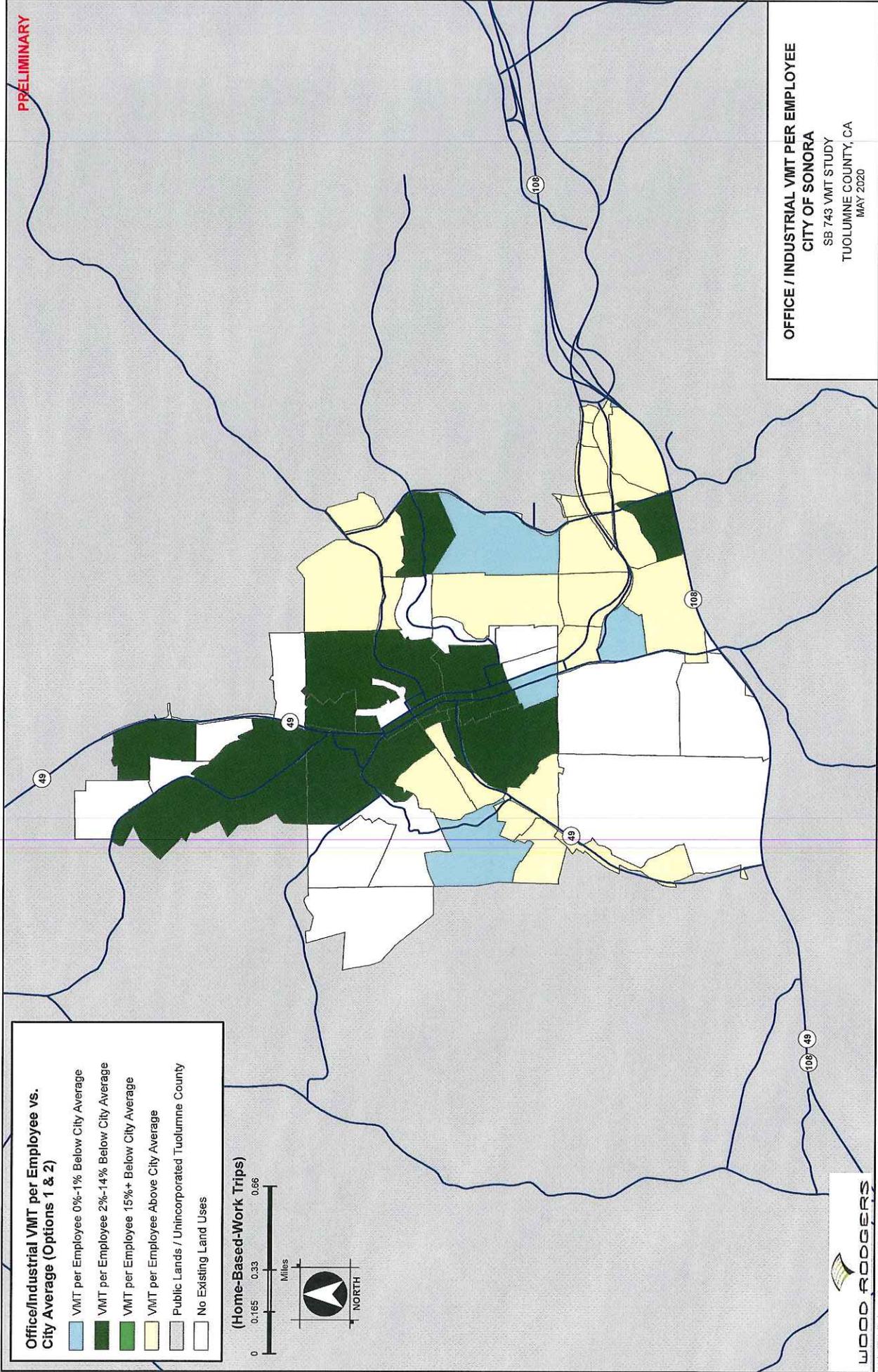
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PRELIMINARY

Office/Industrial VMT per Employee vs. City Average (Options 1 & 2)

-  VMT per Employee 0%-1% Below City Average
-  VMT per Employee 2%-14% Below City Average
-  VMT per Employee 15%+ Below City Average
-  VMT per Employee Above City Average
-  Public Lands / Unincorporated Tuolumne County
-  No Existing Land Uses

(Home-Based-Work Trips)



OFFICE / INDUSTRIAL VMT PER EMPLOYEE
CITY OF SONORA
 SB 743 VMT STUDY
 TUOLUMNE COUNTY, CA
 MAY 2020



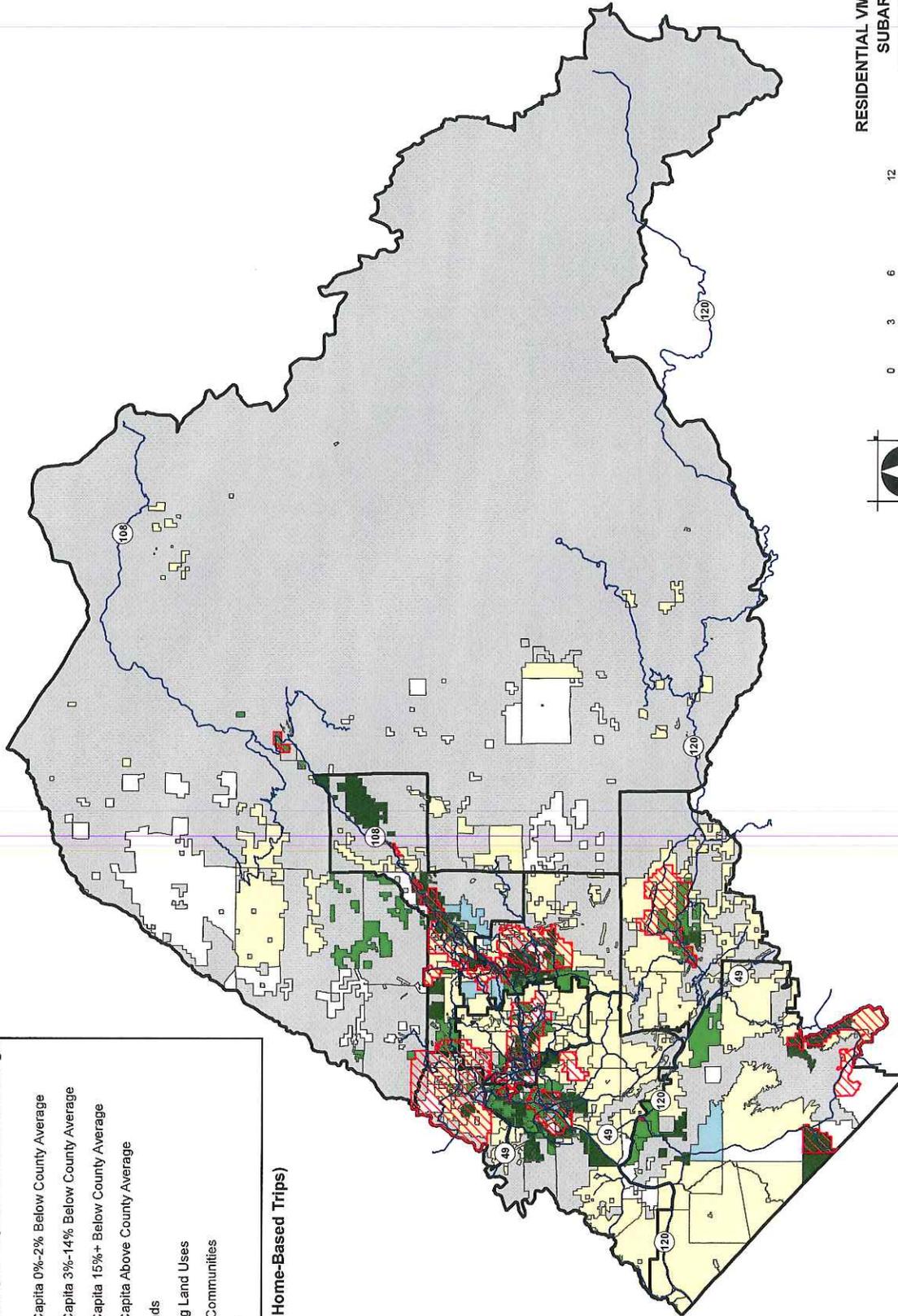
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PRELIMINARY

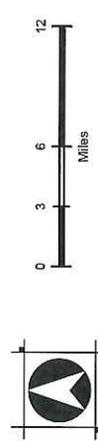
**Residential VMT per Capita vs. Subarea Average
(Option 3)**

-  VMT per Capita 0%-2% Below County Average
-  VMT per Capita 3%-14% Below County Average
-  VMT per Capita 15%+ Below County Average
-  VMT per Capita Above County Average
-  Public Lands
-  No Existing Land Uses
-  Identified Communities
-  Subareas

(Home-Based Trips)

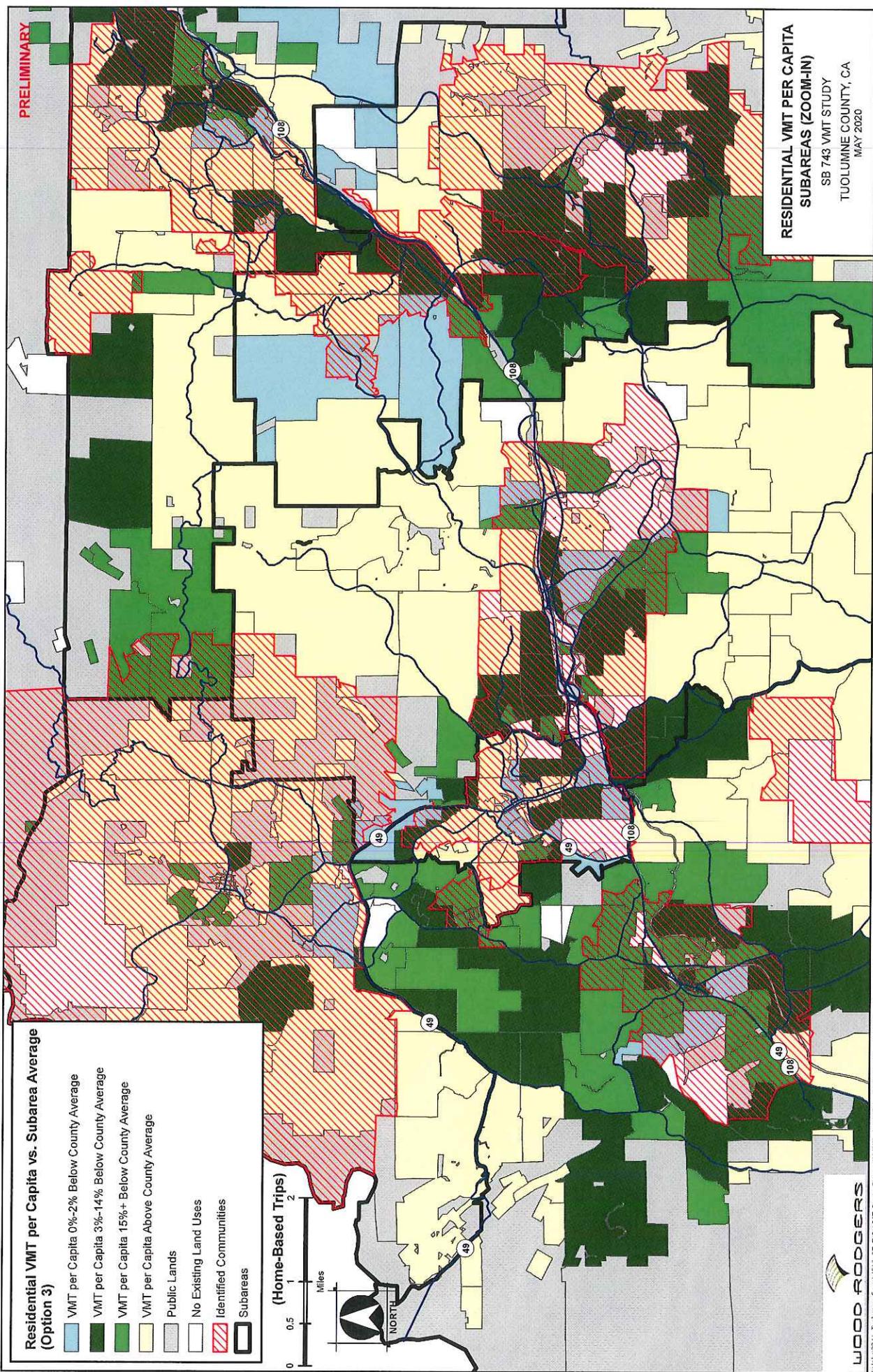


**RESIDENTIAL VMT PER CAPITA
SUBAREAS**
SB 743 VMT STUDY
TUOLUMNE COUNTY, CA
MAY 2020



PRELIMINARY

RESIDENTIAL VMT PER CAPITA
SUBAREAS (ZOOM-IN)
SB 743 VMT STUDY
TUOLUMNE COUNTY, CA
MAY 2020



Residential VMT per Capita vs. Subarea Average (Option 3)

- VMT per Capita 0%-2% Below County Average
- VMT per Capita 3%-14% Below County Average
- VMT per Capita 15%+ Below County Average
- VMT per Capita Above County Average
- Public Lands
- No Existing Land Uses
- Identified Communities
- Subareas

(Home-Based Trips)

0 0.5 1 2
Miles

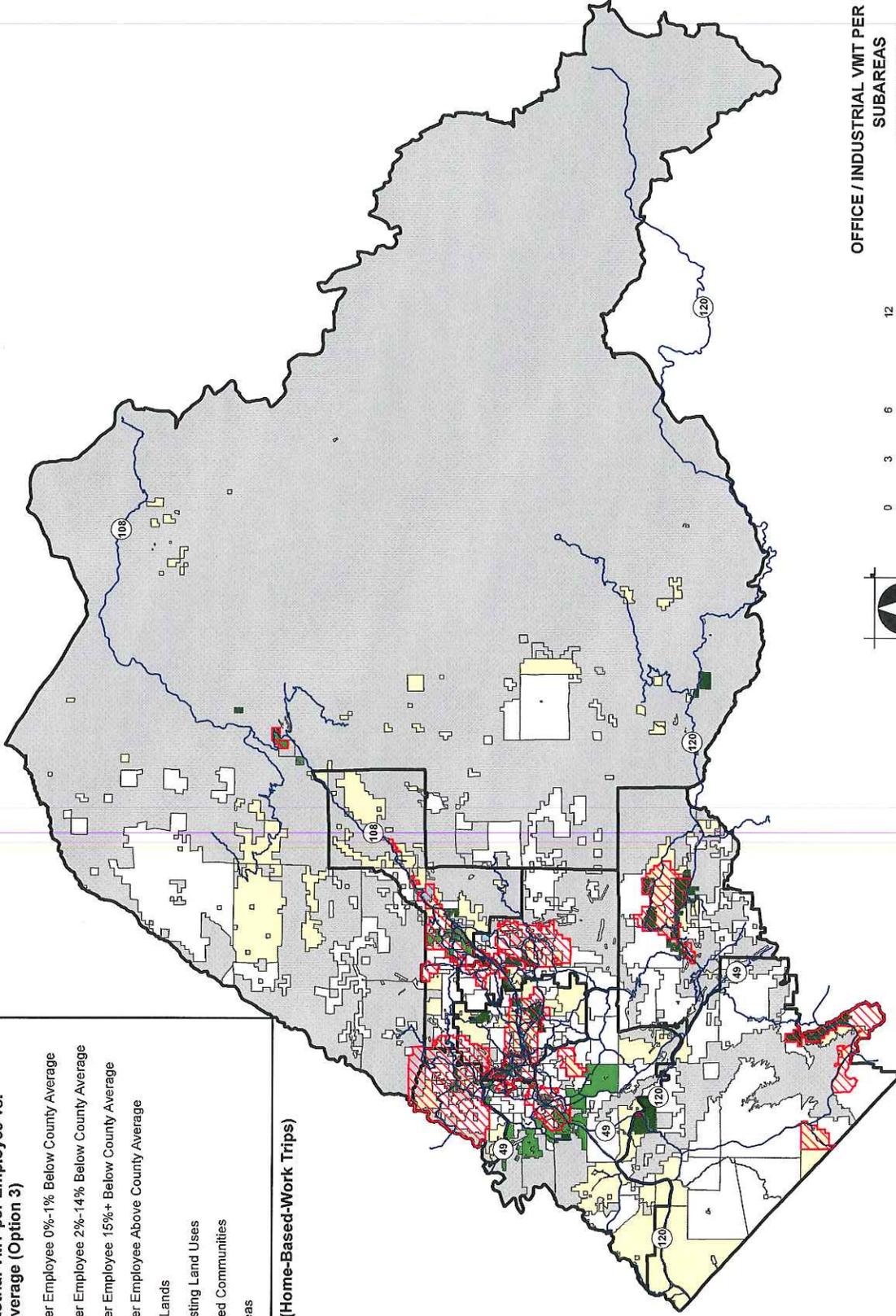


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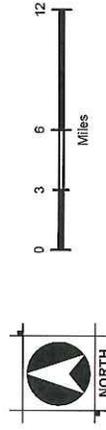
PRELIMINARY

- Office/Industrial VMT per Employee vs. Subarea Average (Option 3)**
- VMT per Employee 0%-1% Below County Average
 - VMT per Employee 2%-14% Below County Average
 - VMT per Employee 15%+ Below County Average
 - VMT per Employee Above County Average
 - Public Lands
 - No Existing Land Uses
 - Identified Communities
 - Subareas

(Home-Based-Work Trips)

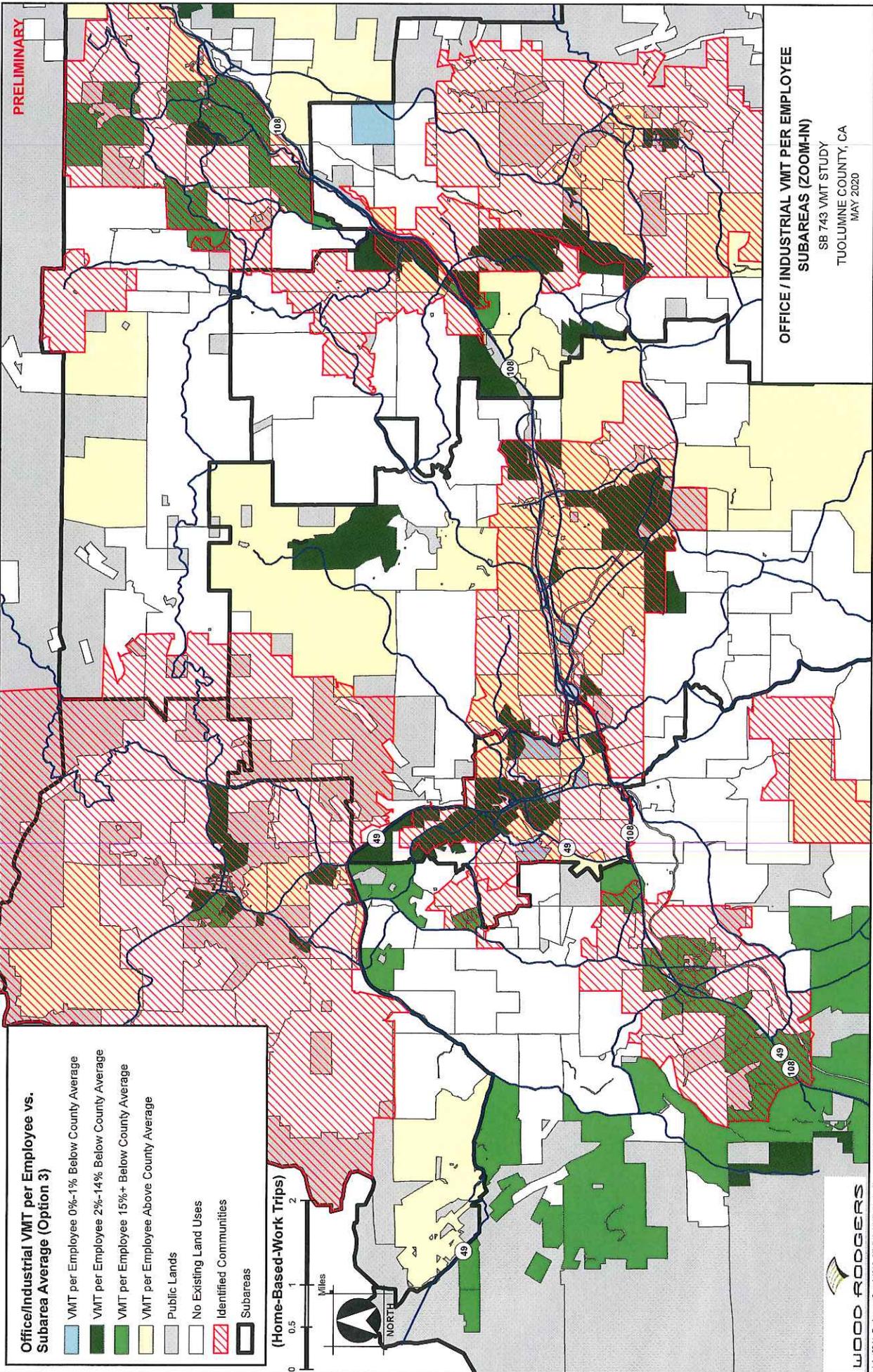


**OFFICE / INDUSTRIAL VMT PER EMPLOYEE
SUBAREAS**
SB 743 VMT STUDY
TUOLUMNE COUNTY, CA
MAY 2020



PRELIMINARY

OFFICE / INDUSTRIAL VMT PER EMPLOYEE
SUBAREAS (ZOOM-IN)
SB 743 VMT STUDY
TUOLUMNE COUNTY, CA
MAY 2020



Office/Industrial VMT per Employee vs. Subarea Average (Option 3)

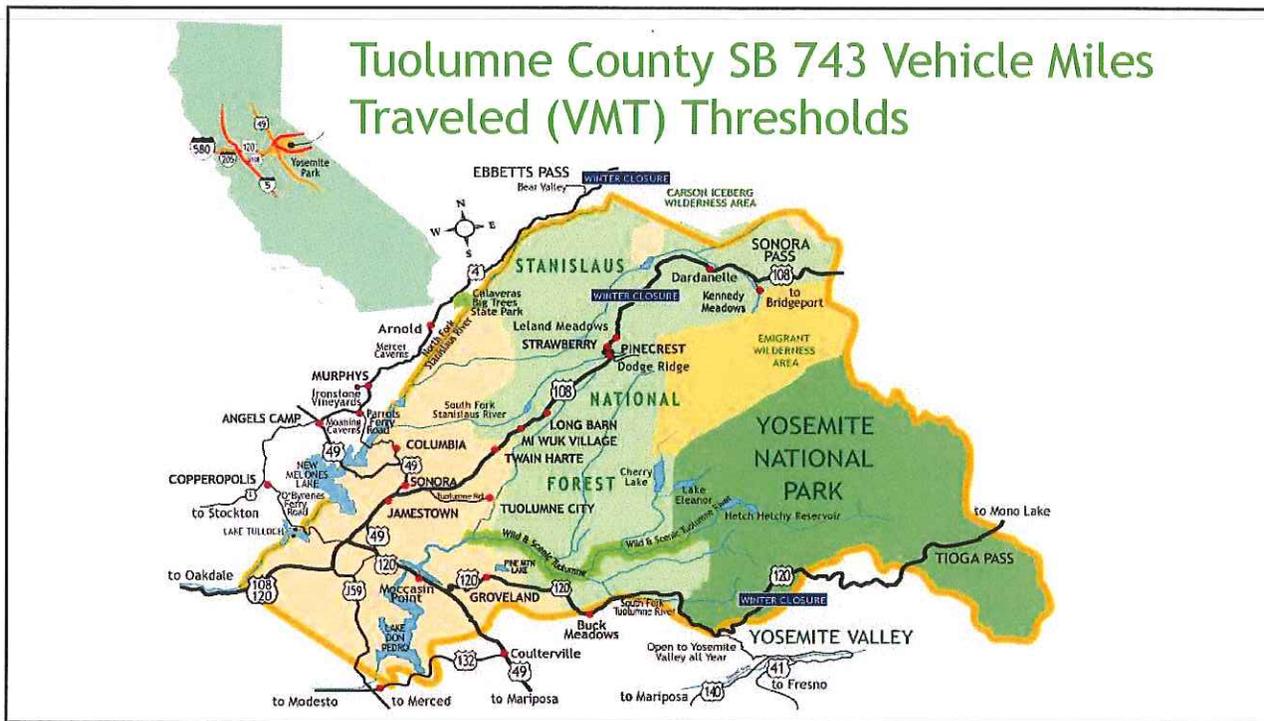
- VMT per Employee 0% - 1% Below County Average
- VMT per Employee 2% - 14% Below County Average
- VMT per Employee 15%+ Below County Average
- VMT per Employee Above County Average
- Public Lands
- No Existing Land Uses
- Identified Communities
- Subareas

(Home-Based-Work Trips)

0 0.5 1 2 Miles



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Senate Bill 743

- ▶ Required the amendment of California Environmental Quality Act (CEQA) Guidelines to change the way transportation impacts are analyzed
 - ▶ Automobile Delay can no longer be used to determine significant impacts in CEQA
- ▶ New methodology needs to support California's goals of:
 - ▶ Reduction of greenhouse gas emissions
 - ▶ Development of multimodal transportation networks
 - ▶ Diversity of land uses and infill development
- ▶ Vehicle Miles Traveled (VMT) was identified as the new criterion for evaluating transportation impacts in CEQA

Recommended Thresholds for Tuolumne County

Overview:

1. Background on Thresholds
2. Land Use Project Thresholds
3. Transportation Project Thresholds

1. Background on Thresholds

What the CEQA Guidelines Say on Thresholds (Sections 15064, 15064.3, and 15064.7)

- ▶ Thresholds determine how much VMT is a significant impact
- ▶ Thresholds must be developed through a public review process
- ▶ Thresholds must be supported by substantial evidence
- ▶ Thresholds to be used as part of a lead agency's environmental review process should be adopted by ordinance, resolution, rule, or regulation

Notes

- ▶ This Presentation Discusses:
 - ▶ “The City of Sonora” or “City”
 - ▶ “Unincorporated Tuolumne County” or “County”
 - ▶ “Overall Region” = the entirety of Tuolumne County including City of Sonora

2. Land Use Project Thresholds

Recommended Land Use Project Screening Criteria

The following types of projects would be screened out:

1. **Residential, Office, or Industrial Employment Projects Located within a Low VMT Area:** low-VMT areas defined by VMT maps.
2. **Small Project:** <110 trips per day & consistent with County General Plan.
3. **Local-Serving Retail:** local-serving & 50,000 square feet or less.
4. **Local-Serving Public Facility:** public K-12 schools, local parks, libraries, post offices, police stations, utility buildings, etc.

Recommended Land Use Project Screening Criteria (cont.)

5. **Affordable Housing:** 100% affordable housing located in Identified Communities.
6. **Mixed-Use Project:** Each project land use type should be considered separately and compared against the appropriate screening criteria.
7. **Redevelopment Project:** Projects that would generate less total VMT than the existing land use they are replacing.

Residential, Office, and Industrial Employment Projects

- ▶ **Option 1:** OPR Technical Advisory Recommended Thresholds
- ▶ **Option 2:** General Plan Future Year Growth Based Thresholds
- ▶ **Option 3:** Subarea Baseline Conditions Thresholds

Option 1: OPR Technical Advisory Recommended Thresholds

- ▶ **Objective:**
 - ▶ Stay consistent with the generalized State recommendations.
- ▶ **Background:**
 - ▶ The OPR derived these numbers from research that outlined what may be necessary for California to reach its climate goals.
 - ▶ Based on state-level data.

Option 1: OPR Technical Advisory Recommended Thresholds

Proposed Threshold

A project's impacts would be less than significant if:

- ▶ **Residential:** a project's VMT is 15% or more below existing regional VMT per capita.
- ▶ **Office/Industrial:** a project's VMT is 15% or more below existing regional VMT per employee.

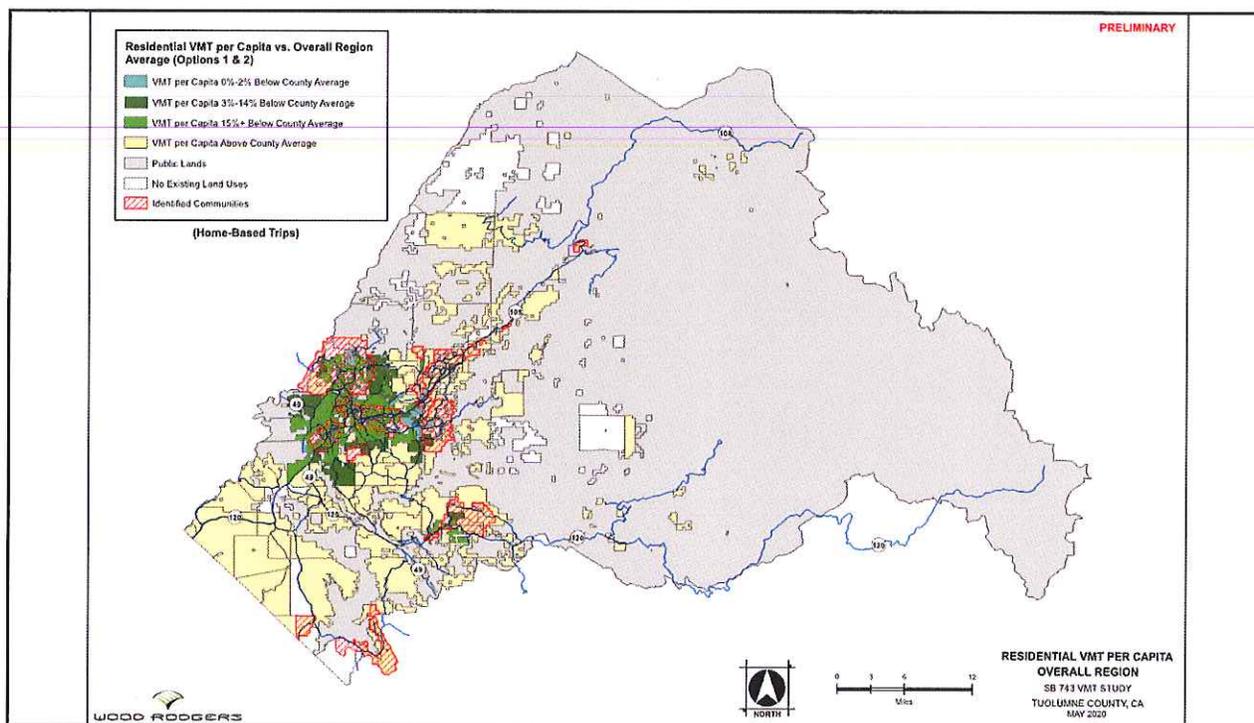
Option 1: OPR Technical Advisory Recommended Thresholds

► Pros:

- Directly recommended by a state agency.
- Linked to California's established GHG targets.

► Cons:

- Not reasonably achievable in unincorporated Tuolumne County and other rural areas.
- Based on general, statewide research that likely primarily focused on urban and suburban settings.
- Inconsistent with the Tuolumne County General Plan and RTP.
- Would result in the most significant impacts for new developments of the three options, most of which would be located outside the Sonora area.



Option 2: General Plan Future Year Growth Based Thresholds

▶ **Objective:**

- ▶ Develop thresholds custom to unincorporated Tuolumne County based on the currently planned growth for the overall region.

▶ **Background:**

- ▶ Long-term growth in Tuolumne County is already guided by the County General Plan.
- ▶ The County General Plan contains a number of policies that are consistent with the goals of SB 743.

Relevant Tuolumne County General Plan Goals and Policies

Community Development and Design	
Policy 1.A.4	Focus urban growth in identified communities, emphasizing infill development and the intensified use of existing development.
Policy 1.A.5	Promote infill and clustered patterns of development that facilitate the efficient and timely provision of infrastructure and services.
Housing	
Policy 2.A.4	Encourage residential infill development through flexible development standards in areas of the County where adequate public facilities and services are already in place taking into consideration the visual character of the neighborhood.
GOAL 2B	Encourage and promote the development and rehabilitation of extremely low-, very low-, low-, median-, and moderate-income housing for the residents of Tuolumne County to meet the regional housing need.
Transportation	
GOAL 4B	Encourage the use of alternative means of transportation by providing safe bicycle and pedestrian facilities within urban development boundary areas and between identified communities thereby reducing road congestion which improves circulation, health and air quality within the County.
Policy 4.B.1	Develop a modern transportation system that incorporates alternative transportation modes into the system design.

Option 2: General Plan Future Year Growth Based Thresholds

▶ Background (cont.):

- ▶ Based on the General Plan RTDM scenario:
 - ▶ Year 2040 overall region average VMT per capita is projected to be 3% less than the existing average.
 - ▶ Year 2040 overall region average VMT per employee is projected to be 1% less than the existing average.
- ▶ These numbers can be used to establish thresholds.

Option 2: General Plan Future Year Growth Based Thresholds

Proposed Threshold

A project's impacts would be less than significant if:

- ▶ **Residential:** a project's VMT is 3% or more below regional average VMT per capita, and the project is consistent with the County General Plan and the RTP.
- ▶ **Office/Industrial:** a project's VMT is 1% or more below regional average VMT per employee, and the project is consistent with the County General Plan and the RTP.

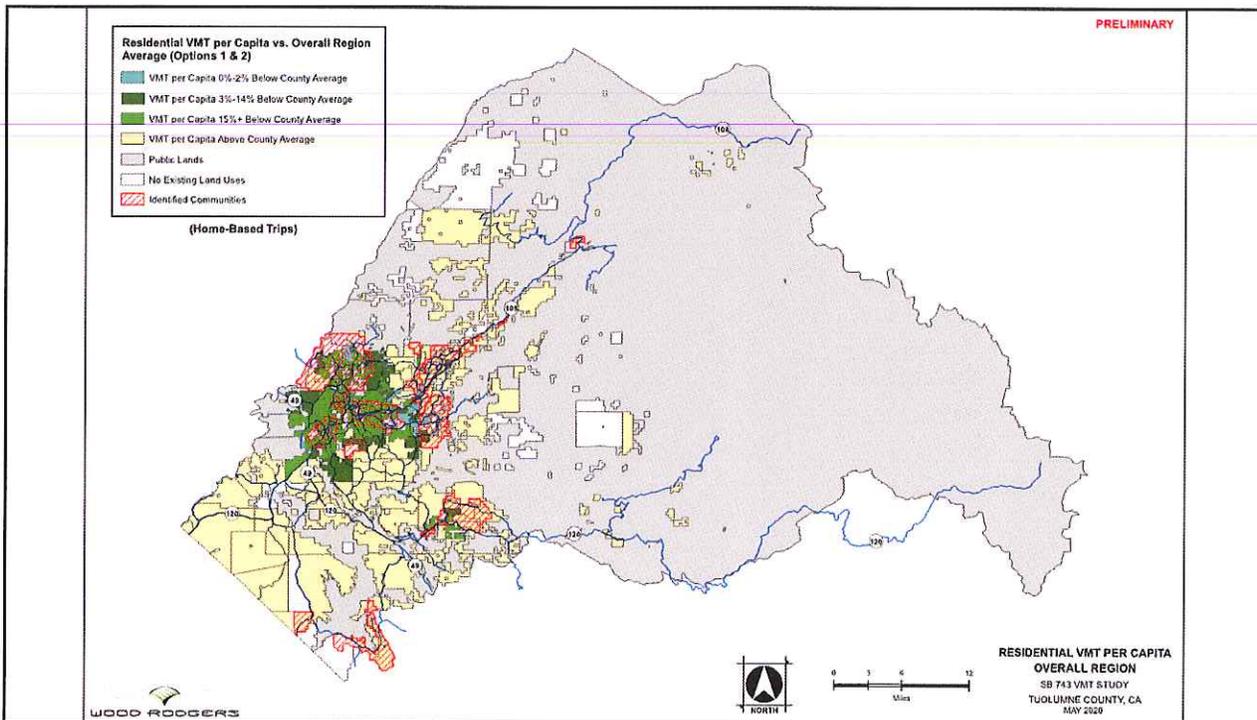
Option 2: General Plan Future Year Growth Based Thresholds

► **Pros:**

- Based on data specific to Tuolumne County.
- Consistent with the County’s “approved” long-term “VMT growth budget”.
- Promotes a reduction in VMT.
- Reasonably achievable in unincorporated Tuolumne County.

► **Cons:**

- Does not take into account Tuolumne County’s Identified Communities or encourage clustered communities.
- Will this be adequate to help the state achieve statutory goals, including GHG goals?
- Would potentially achieve reduction in the overall region average VMT at a slower rate than Option 1.



Option 3: Subarea Baseline Conditions Thresholds

▶ Objective:

- ▶ Develop thresholds custom to unincorporated Tuolumne County based on the currently planned vision for the various regions of the County, taking into account where and when growth is projected to occur.

▶ Background:

- ▶ Generally, in CEQA, an impact is viewed as a change to existing or baseline conditions.
- ▶ Proposed projects would be expected to operate no worse than the average for existing similar land uses under baseline conditions.
- ▶ Would calculate baseline year VMT by interpolating between the year 2015 and year 2040 RTDM scenarios.

Option 3: Subarea Baseline Conditions Thresholds

▶ Background (cont.):

- ▶ Baseline conditions could be established for the overall region, or for subareas of the County.
- ▶ Different areas of Tuolumne County contain different land use types, transportation infrastructure, and travel patterns. This should be accounted for when developing a threshold.
- ▶ Nine (9) potential subareas have been created for Tuolumne County based on travel characteristics, proximity, geographical features, and “Identified Communities” (from the County General Plan).

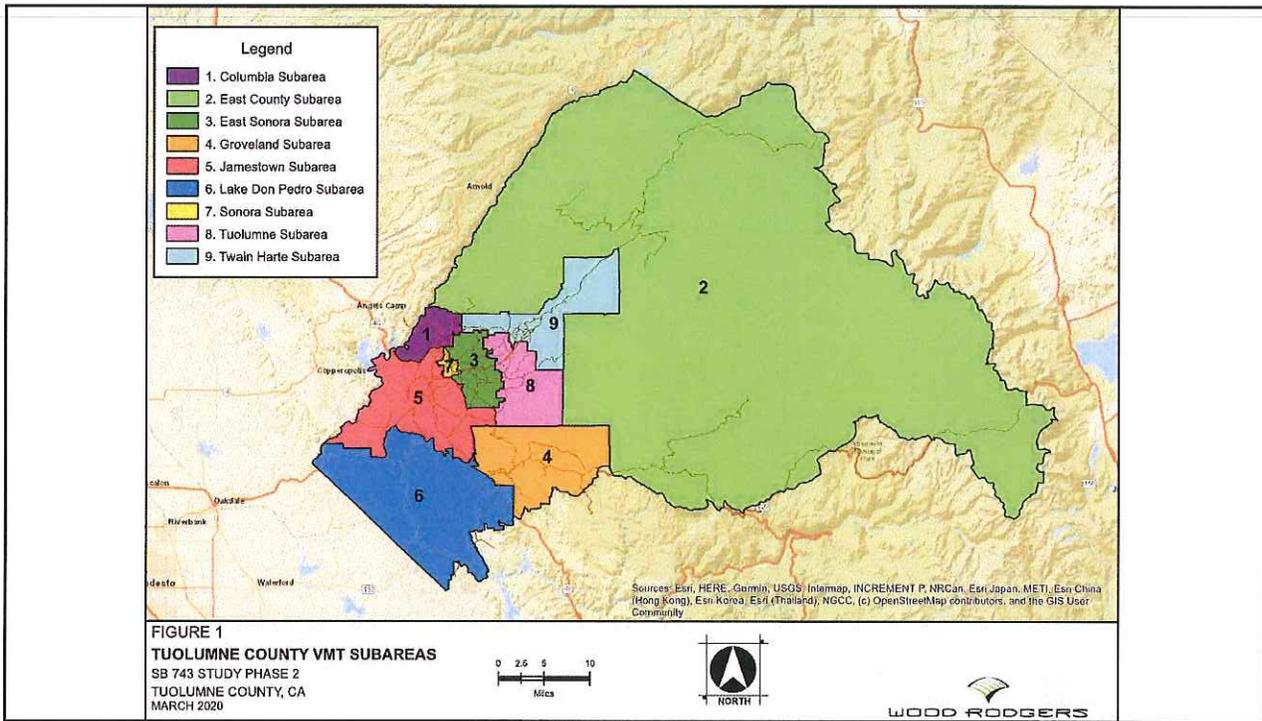


Table 1. Existing Year 2020 Average VMT by Area

Area	Residential VMT per Capita	Office/Industrial VMT per Employee
Overall Region	26.3	40.7
City of Sonora	17.6	33.1
Unincorporated County	27.5	44.8
Columbia Subarea	18.5	25.4
East County Subarea	45.3	109.6
East Sonora Subarea	19.0	34.7
Groveland Subarea	32.9	41.6
Jamestown Subarea	22.9	48.5
Lake Don Pedro Subarea	63.6	100.4
Sonora Subarea	17.6	33.1
Tuolumne Subarea	29.0	34.6
Twain Harte Subarea	31.6	46.2

Baseline Average Residential VMT per Capita by Subarea

Year	Columbia Subarea	East County Subarea	East Sonora Subarea	Groveland Subarea	Jamestown Subarea	Lake Don Pedro Subarea	Sonora Subarea	Tuolumne Subarea	Twain Harte Subarea
2020	10.5	45.3	19.0	32.9	22.9	63.6	17.6	29.0	31.6
2021	10.6	45.3	18.9	32.9	22.9	63.6	17.6	28.9	31.6
2022	10.6	45.2	18.9	32.9	22.8	63.7	17.6	28.9	31.5
2023	10.6	45.2	18.9	32.0	22.8	63.7	17.6	28.9	31.5
2024	10.6	45.2	18.9	32.0	22.7	63.7	17.6	28.9	31.5
2025	10.6	45.1	18.9	32.0	22.7	63.8	17.6	28.8	31.4
2026	10.6	45.1	18.9	32.7	22.7	63.8	17.6	28.8	31.4
2027	10.6	45.1	18.9	32.7	22.6	63.8	17.6	28.8	31.4
2028	10.6	45.0	18.9	32.6	22.6	63.8	17.6	28.7	31.3
2029	10.6	45.0	18.9	32.6	22.5	63.9	17.6	28.7	31.3
2030	10.6	45.0	18.9	32.6	22.5	63.9	17.6	28.7	31.3
2031	10.6	44.9	18.9	32.5	22.5	63.9	17.6	28.6	31.2
2032	10.6	44.9	18.8	32.5	22.4	64.0	17.6	28.6	31.2
2033	10.6	44.9	18.8	32.5	22.4	64.0	17.6	28.6	31.2
2034	10.6	44.8	18.8	32.4	22.3	64.0	17.6	28.6	31.2
2035	10.7	44.8	18.8	32.4	22.3	64.1	17.6	28.5	31.1
2036	10.7	44.8	18.8	32.3	22.3	64.1	17.6	28.5	31.1
2037	10.7	44.7	18.8	32.3	22.2	64.1	17.6	28.5	31.1
2038	10.7	44.7	18.8	32.3	22.2	64.1	17.6	28.4	31.0
2039	10.7	44.7	18.8	32.2	22.2	64.2	17.6	28.4	31.0
2040	10.7	44.6	18.8	32.2	22.1	64.2	17.6	28.4	31.0

Baseline Average Office/Industrial VMT per Employee by Subarea

Year	Columbia Subarea	East County Subarea	East Sonora Subarea	Groveland Subarea	Jamestown Subarea	Lake Don Pedro Subarea	Sonora Subarea	Tuolumne Subarea	Twain Harte Subarea
2020	25.4	109.6	34.7	41.6	48.5	100.4	33.1	34.6	46.2
2021	25.5	109.9	34.7	41.6	48.3	100.4	33.1	34.6	46.2
2022	25.5	110.1	34.7	41.7	48.1	100.4	33.1	34.6	46.2
2023	25.5	110.4	34.7	41.7	47.9	100.4	33.1	34.6	46.2
2024	25.5	110.7	34.7	41.7	47.7	100.4	33.1	34.6	46.2
2025	25.6	111.0	34.7	41.7	47.5	100.4	33.1	34.6	46.2
2026	25.6	111.2	34.7	41.8	47.3	100.4	33.0	34.6	46.2
2027	25.6	111.5	34.7	41.8	47.1	100.4	33.0	34.6	46.2
2028	25.6	111.8	34.6	41.8	46.9	100.4	33.0	34.6	46.2
2029	25.7	112.0	34.6	41.9	46.7	100.4	33.0	34.6	46.2
2030	25.7	112.3	34.6	41.9	46.5	100.4	33.0	34.6	46.2
2031	25.7	112.6	34.6	41.9	46.3	100.4	33.0	34.6	46.2
2032	25.7	112.8	34.6	41.9	46.0	100.4	33.0	34.6	46.2
2033	25.8	113.1	34.6	42.0	45.8	100.4	33.0	34.6	46.2
2034	25.8	113.4	34.6	42.0	45.6	100.4	33.0	34.6	46.2
2035	25.8	113.7	34.6	42.0	45.4	100.4	33.0	34.6	46.2
2036	25.8	113.9	34.6	42.0	45.2	100.4	33.0	34.5	46.2
2037	25.8	114.2	34.6	42.1	45.0	100.4	33.0	34.5	46.2
2038	25.9	114.5	34.6	42.1	44.8	100.4	33.0	34.5	46.2
2039	25.9	114.7	34.6	42.1	44.6	100.4	33.0	34.5	46.2
2040	25.9	115.0	34.6	42.1	44.4	100.4	33.0	34.5	46.2

Option 3: Subarea Baseline Conditions Thresholds

Proposed Threshold

A project's impacts would be less than significant if:

- ▶ **Residential:** a project's VMT is less than or equal to the subarea average VMT per capita under baseline conditions, and the project is consistent with the County General Plan and the RTP.
(Home-Based VMT)
- ▶ **Office/Industrial:** a project's VMT is less than or equal to the subarea average VMT per employee under baseline conditions, and the project is consistent with the County General Plan and the RTP.
(Home-Based-Work VMT)

Option 3: Subarea Baseline Conditions Thresholds

▶ Pros:

- ▶ Based on data specific to Tuolumne County.
- ▶ Consistent with the "approved" long-term "VMT growth budget".
- ▶ Takes into account Tuolumne County's Identified Communities and encourages clustered communities.
- ▶ Promotes a reduction in VMT.

▶ Cons:

- ▶ Will this be adequate to help the state achieve statutory goals, including GHG goals?
- ▶ Would potentially achieve reduction in the overall region average VMT at a slower rate than Options 1 and 2.

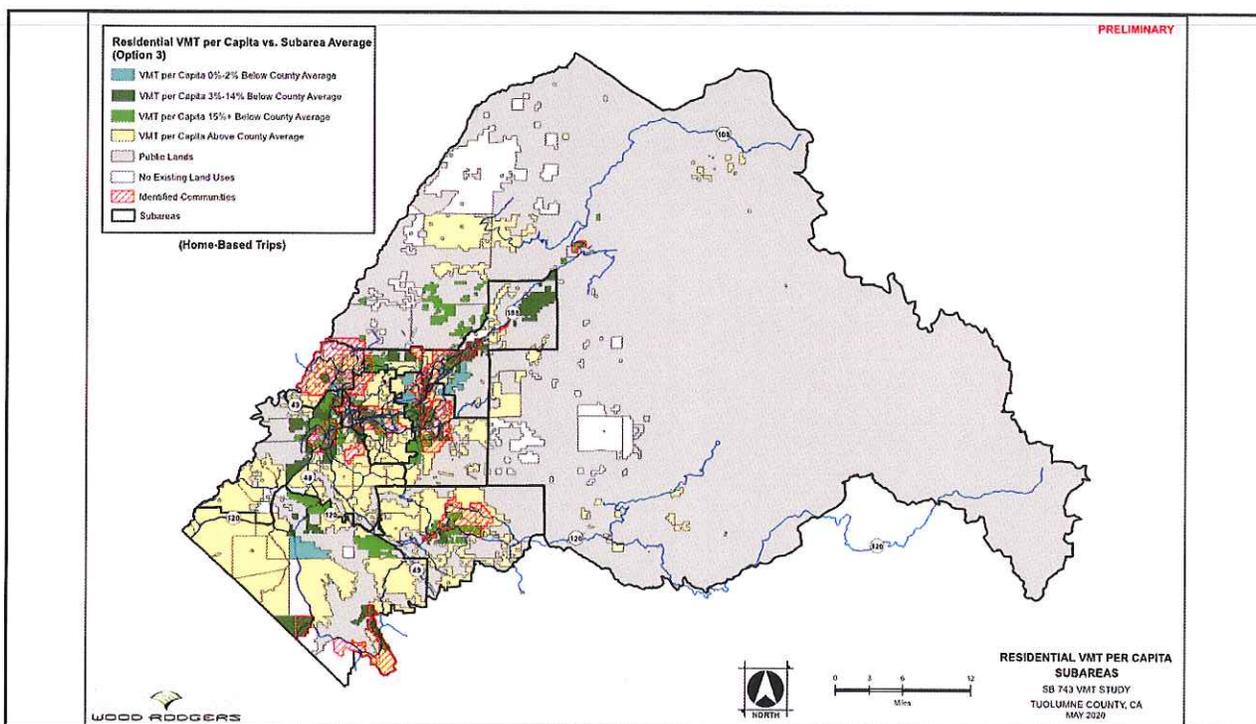


Table 2. Summary of Residential, Office, and Industrial Threshold Options

Option	Thresholds (A project's impacts would be less than significant if:)
Option 1 – OPR Recommended Thresholds	<p><u>Residential:</u> a project's VMT is 15% or more below regional average VMT per capita.</p> <p><u>Office/Industrial:</u> a project's VMT is 15% or more below regional average VMT per employee.</p>
Option 2 – General Plan Based Thresholds	<p><u>Residential:</u> a project's VMT is 3% or more below regional average VMT per capita, <u>and</u> the project is consistent with the County General Plan and the RTP.</p> <p><u>Office/Industrial:</u> a project's VMT is 1% or more below regional average VMT per employee, <u>and</u> the project is consistent with the County General Plan and the RTP.</p>
Option 3 – Subarea Baseline Conditions Thresholds	<p><u>Residential:</u> a project's VMT is less than or equal to the subarea average VMT per capita under baseline conditions, <u>and</u> the project is consistent with the County General Plan and the RTP.</p> <p><u>Office/Industrial:</u> a project's VMT is less than or equal to the subarea average VMT per employee under baseline conditions, <u>and</u> the project is consistent with the County General Plan and the RTP.</p>

Unincorporated Tuolumne County Recommendation

- ▶ **Option 3 (Subarea Baseline)** is recommended for the County.
 - ▶ Consistent with the County General Plan and RTP.
 - ▶ Encourages a reduction in VMT.
 - ▶ Acknowledges different characteristics of the various areas of the County.
- ▶ Reasons Options 1 and 2 aren't recommended for the County:
 - ▶ Option 1 not consistent with County General Plan and not reasonably achievable in unincorporated Tuolumne County.
 - ▶ Option 2 not consistent with "Identified Communities" in County General Plan.

Other Land Use Project Types

Table 3. Recommended Thresholds for Other Common Land Use Types

Land Use Type	Threshold
Retail/Non-Office Commercial	No net increase in total regional VMT.
Hotel/Campground	No net increase in total regional VMT; or Alternative: Consistent with General Plan and less than or equal to subarea baseline average VMT per room/site.
Mixed-Use	Analyze each land use individually per the relevant thresholds.
Redevelopment	If the redevelopment of an existing site leads to a net overall decrease, or no change in VMT, the project impact would be less than significant. If the redevelopment of an existing site leads to a net overall increase in VMT, the project would be evaluated based on the relevant thresholds as if it were a new project.

Alternative Hotel and Campground Thresholds

- ▶ “No net increase in total regional VMT” can be very difficult to meet.
- ▶ Could be argued that hotel guests to the region would have just stayed somewhere else if the new hotel wasn't there.
 - ▶ Potential redistribution of visitor trips closer to their destinations.
 - ▶ Potential to create lower VMT generating hotels and campgrounds.

Alternative Hotel and Campground Thresholds

Proposed Threshold

A project's impacts would be less than significant if:

- ▶ **Hotel:** a project's total hotel VMT per room is 15% or more below the subarea average hotel VMT per room under baseline conditions, and the project is consistent with the County General Plan and the RTP.
- ▶ **Campground:** a project's total campground VMT per site is 15% or more below the subarea average campground VMT per site under baseline conditions, and the project is consistent with the County General Plan and the RTP.

Alternative Hotel and Campground Thresholds

Region	Average Existing Hotel VMT/Room	Average Existing Campground VMT/Site
Columbia	31.1	15.1
East County	129.1	48.9
East Sonora	28.2	n/a
Groveland	72.0	25.9
Jamestown	34.8	33.9
Lake Don Pedro	n/a	43.1
Sonora	41.8	n/a
Tuolumne	n/a	n/a
Twain Harte	61.1	27.6
Unincorporated County	63.1	44.4
Overall Region	57.6	44.4

Alternative Hotel and Campground Thresholds

- ▶ **Pros:**
 - ▶ Based on data specific to Tuolumne County.
 - ▶ Reasonably achievable for projects in unincorporated Tuolumne County.
 - ▶ Promotes development of lower VMT hotels and campgrounds.
- ▶ **Cons:**
 - ▶ Less strict than a “no net increase” threshold.
 - ▶ Based on a limited number of existing data points.

Example Hotel Project

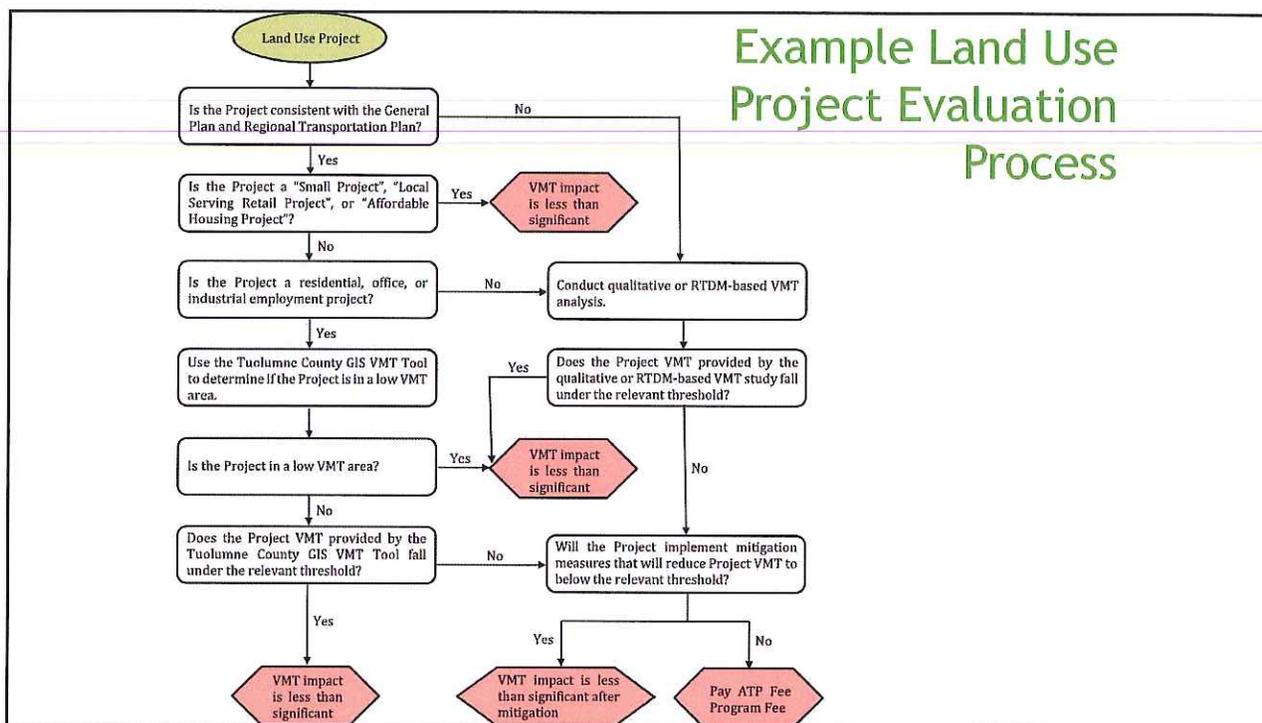
- ▶ Proposed 126 room Hotel to be located on SR 120 approximately mid-way between Groveland and Yosemite.
- ▶ Onsite employee housing for ~2/3 of employees.
- ▶ Small~3,000 sq. ft. on-site market.
- ▶ Located in East County subarea.
- ▶ Analysis:
 - ▶ Could treat each piece of project separately and “screen out” the employee housing and market.
 - ▶ Calculate VMT/room of the hotel piece of the project, assuming internal match with other land uses.

Example Hotel Project Results

- ▶ **East County Threshold:** 129.1 Hotel VMT / room
- ▶ **Calculated Project VMT (from the RTDM):** 102.5 Hotel VMT / room
- ▶ Project VMT would be 21% lower than existing average Hotel VMT in the subarea.
 - ▶ This is due to the hotel proximity to guest destinations (Yosemite), provided on-site employee housing, and internal match trips with on-site market.

Land Use Plans & Cumulative Thresholds

- ▶ Aggregated land uses in a land use plan would be held against same standards as individual projects.
- ▶ Efficiency-based thresholds would apply for baseline and cumulative conditions.
- ▶ No net increase thresholds would have to be evaluated under baseline and cumulative conditions separately.



3. Transportation Project Thresholds

Recommended Transportation Project Screening Criteria

- ▶ Generally any project that would not lead to a measurable increase in VMT.
- ▶ Types of projects that would be screened out include:
 - ▶ Public transit
 - ▶ Active transportation
 - ▶ Complete streets (with no increase in vehicle capacity)
 - ▶ Rehabilitation, maintenance, replacement, safety
 - ▶ Turn lanes, auxiliary lanes, non-through lanes
 - ▶ Traffic control devices, including signs, signals, roundabouts
 - ▶ Truck passing lanes or climbing lanes
 - ▶ Projects that add local road capacity and substantially improve non-motorized conditions

Recommended Thresholds

Table 8. Recommended Thresholds for Transportation Projects

Condition	Threshold
Short-Term	No net increase in total regional VMT under baseline conditions.
Long-Term	No net increase in total regional VMT under cumulative conditions.

- ▶ If a transportation project is consistent with the County General Plan, cumulative analysis may not be required.

Example Transportation Projects

1. Greenly Road Extension

- ▶ Estimated net change in overall region VMT due to the project using the RTDM.
- ▶ Net change in overall region VMT: increase of 1,500 VMT/day.
- ▶ New roadway connection provides a more direct connection to some land uses, potentially increasing vehicle trips, or making further away destinations more attractive.
- ▶ RTDM captures this through its mode choice submodel. As vehicular capacity increases and travel times decrease, more people shift to vehicular modes and away from other modes.
- ▶ Rerouting of trips via the new roadway is also accounted for.

