In accordance with Senate Bill 743 (SB 743) and the resulting changes to the California Environmental Quality Act (CEQA) Guidelines published by the Natural Resources Agency, local agencies may no longer use measures of vehicle delay such as Level of Service (LOS) to quantify transportation impacts on the environment. VMT is a systemic metric and is a useful indicator of overall land use and transportation efficiency, where the most efficient system is one that minimizes VMT by encouraging shorter vehicle trip lengths, more walking and biking, or increased carpooling and transit. Vehicle miles traveled (VMT) has been codified in the CEQA Guidelines as the most appropriate measure for measuring transportation impacts under CEQA. This change went to effect statewide on July 1, 2020. The City of Sacramento’s draft transportation impact guidelines is consistent with OPR’s recommendation of using VMT as a metric.

Based on current practice of the City of Sacramento, transportation impacts are considered significant if the proposed project would result in a VMT per capita or office VMT per employee above 85% of the regional average, consistent with technical guidance published by the Governor’s Office of Planning and Research (OPR). The OPR guidance does not specify a particular significance threshold for industrial employment and recommends that local jurisdictions determine this threshold based on local conditions. Some jurisdictions in the Sacramento region (including Sacramento County (adopted) and the City of Rancho Cordova (draft guidelines)) have determined that the significance threshold for industrial employment is 100% of regional average. The draft City of Sacramento Transportation Impact Analysis Guidelines do not specify a significance threshold for industrial land uses. For consistency purposes, this analysis applies the significance threshold of 100% of regional average for industrial uses.

The methodology in this analysis for evaluating VMT and completing an SB 743 compliant analysis of the proposed Florin Perkins distribution center in the City of Sacramento is described below.
VMT SCREENING CRITERIA

Pursuant to SB 743 and technical guidance published by OPR, there are several screening procedures to potentially streamline project analysis (i.e., provide a presumptive non-impact finding and obviate the need for a VMT analysis). The various screening options are listed below with a brief determination of whether a given screen is triggered by the proposed project.

- **Project Size**: projects that generate fewer than 110 trips per day can be presumed to have a less than significant transportation impact. Based on the trip generation data presented in the Transportation Impact Analysis (in a separate document prepared by DKS), the proposed Florin Perkins distribution center does not trigger this screen.

- **Proximity to High Quality Transit**: residential or office projects within one-half mile of an existing major transit station or stop along an existing high-quality transit corridor can be presumed to have a less than significant transportation impact. The proposed project is located near the intersection of Florin Perkins Road and Belvedere Avenue. Currently, one Sacramento Regional Transit (SacRT) bus route travels along this roadway adjacent to the proposed project site. SacRT Route 161 provides only peak hour service between Belvedere Avenue and the College Greens light rail station to the north. Given that existing bus route is not considered “high quality” the project does not trigger this screen.

- **Affordable Housing Development**: The proposed project does not include the provision of housing, the proposed project does not trigger this screen.

- **Locally Serving Retail**: typically less than 50,000 square feet. The proposed project does not contain commercial square footage and thus does not trigger this screen.

- **Infrastructure**: projects that would not likely lead to a substantial or measurable increase in vehicle travel are presumed to be VMT neutral and generally presumed to have a less than significant transportation impact (i.e., induced VMT). These include: Roadway Maintenance and Rehab Projects; Signal Timing / Synchronization / Adaptive Signal Control /Signal Preemption Improvements; Intersection Control Type and Turn Lane Channelization Improvements; Widening for Local or Local Collector Streets; and Transit / Bicycle / Pedestrian Infrastructure Improvements. The proposed project does not contain any substantial infrastructure improvements that trigger this screen.

- **Project Location**: projects that fall within an identified location (in this case SACOG’s hexagons) that demonstrates VMT per Capita for residential projects or VMT per Employee for employment-based projects below 85% of the regional average for that metric. The proposed project was identified as falling within three adjacent hexagons. Mapping shows that the three hexagons on which the project site is located demonstrate VMT per employee.
that are approximately 87.9%, 102.9%, and 100.3% of the regional average, as shown below. The proposed project does not fall within a geographic location (SACOG hexagon) that potentially triggers this screen.

**FIGURE 1: SACSIM19 2016 VMT PER CAPITA FOR PROJECT LOCATION**
VMT ANALYSIS

Based on the screening assessment and the proposed project description, the operative VMT metric that requires analysis is VMT per employee. It is recommended that the proposed project’s employment is analyzed according to the primary proposed land use type, as follows:

**Work VMT** – Establish baseline VMT and threshold on a per employee basis. “Work” uses include, but are not limited to industrial/warehousing employment and support service staff employment.

*The proposed thresholds are 100 percent of the existing baseline regional VMT per land use unit, as calculated within the SACOG region (office, commercial, manufacturing, industrial).* These recommendations are consistent with OPR guidance and thresholds used by other local agencies.

**TRAVEL DEMAND MODEL**

The CEQA VMT analysis is based on the latest SACOG SACSIM-19 activity-based travel demand model (ABM) including scripts prepared by SACOG for this very analysis purpose. The analysis is tour-based, meaning that the analysis fully accounts for trips that are linked to trips that start or end at the project. This clarification means that intermediate trips, such as those occurring after someone has left the project area, such as a trip to pick-up lunch while at work, are accounted for in this analysis.

Based on the latest SACOG model scripts, SACSIM-19 also reflects the entire trip length, including the portion of the trip that occurs outside the SACOG region. External-internal and internal-external VMT is calculated via a script file provided by SACOG and included in their model for VMT post-processing. The post-processor determines the added VMT that occurs outside the SACOG region (i.e., for trips that either start or end outside of the region). This interregional VMT is then added to the internal-internal VMT to determine the total VMT. Consistent with OPR guidelines only automobile trips are considered as a part of this analysis. Heavy-duty truck and delivery vehicle VMT as well as alternative mode VMT (transit vehicles) are not reflected.

**PROJECT USE (VMT PER EMPLOYEE METRIC)**

For work-based land uses of the proposed project, SACSIM-19 was used with the SACOG script per guidance from the Office of Planning and Research (OPR). A regional baseline (2016) average VMT per employee metric was used to establish the threshold set at 85% of the regional average.

The project VMT per employee result is then compared to 100% of the 2016 regional average VMT per employee result. In order to estimate VMT per employee for the project employment, SACOG’s data for the three hexagon areas that contain the project site has been summarized in **Table 1**. The table shows that the weighted average VMT per employee for the project site, based on the percent area in each of the three hexagon areas, is 92.2%, which falls below the 100% threshold used by multiple agencies in the region and recommended for this analysis.
VMT MITIGATION

Based on Table 1, the proposed project land use does not exceed the 100% threshold for VMT per employee compared to the regional average, therefore no mitigation is required at this time.

### TABLE 1: VMT ANALYSIS RESULTS

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<thead>
<tr>
<th></th>
<th>HEXAGON DP-144</th>
<th>HEXAGON DQ-143</th>
<th>HEXAGON DQ-144</th>
<th>WEIGHTED AVERAGE</th>
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</thead>
<tbody>
<tr>
<td>PERCENT OF PROJECT SITE AREA</td>
<td>70%</td>
<td>22%</td>
<td>8%</td>
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<tr>
<td>VMT PER EMPLOYEE</td>
<td>18.69</td>
<td>21.88</td>
<td>21.34</td>
<td><strong>19.61</strong></td>
</tr>
<tr>
<td>PERCENT OF REGIONAL AVERAGE</td>
<td>87.9%</td>
<td>102.9%</td>
<td>100.3%</td>
<td><strong>92.2%</strong></td>
</tr>
</tbody>
</table>