

BCAG SB 743 Implementation Study - Comments and Requests
3/29/2021

Agency	Comment/Request	Response/Action
City of Chico	Explain VMT mitigation by providing a real world example of applying a CAPCOA measure including what monitoring looks like. Is the effectiveness of a piece of infrastructure to be estimated and then built to fulfill the mitigation, or is the intent that the actual performance of it be monitored over time?	<p>The use of the CAPCOA measures are used frequently in EIRs as mitigation but not always with monitoring. Prior to SB 743, mitigation received less scrutiny for many projects and the limitations of CAPCOA strategies, especially those related to TDM, were not always disclosed or discussed such that mitigation monitoring was required. In other words, the EIR would identify a selection of CAPCOA strategies as mitigation and conclude the impact would be less than significant with mitigation. The only monitoring done might have been a check that the strategy was implemented but not whether it was effective in reducing VMT below the threshold. That's started to change with the bright spotlight that SB 743 has placed on VMT and mitigation strategies such as those in CAPCOA. As a result, lead agencies have been evolving and their impact analysis and are starting to recognize VMT mitigation limitations such that monitoring is being added as a necessary component.</p> <p>A local example is the CSU Chico Master Plan EIR. https://www.csuchico.edu/fms/planning.shtml</p> <p>UCD's Long Range Development Plan EIR is another example. This link goes to EIR documentation including mitigation monitoring program. https://environmentalplanning.ucdavis.edu/2018-lrdp-eir/eir</p> <p>Here's the link to EIR transportation impact section that specified the use of TDM mitigation and the requirement for monitoring due to the limitations of TDM strategies with respect to their dependency on building tenant performance. https://ucdavis.app.box.com/s/a3rbnfl4bdjva8nxx0f2nzpc6t68mtbj</p>
Butte County	How will traffic engineers access the model and gain the outputs and information they need when drafting traffic studies?	<p>Presently, consultants and traffic engineers can access the 2020 RTP/SCS model by completing a request and user agreement available on the BCAG website (http://www.bcag.org/Planning/Transportation-Forecasting/index.html). SB 743 VMT metrics from the 2016 RTP/SCS model are available by email request and have been provided to each of the member agencies (June 2020 email).</p> <p>Distribution of the new SB 743 model and outputs could be distributed in a similar manner with a request link included on BCAG's SB 743 webpage. To be discussed further with the stakeholder group and project consultant.</p>
Butte County	When and how will the SB 743 VMT model and data be updated?	The SB 743 model utilizing the 2020 RTP/SCS data will be available upon completion of the SB 743 Implementation Study in June 2021. Moving forward, BCAG would include an update of the SB 743 model with each update of the RTP/SCS which currently occurs on a 4-year cycle. Amendments to the RTP/SCS which affect roadway capacity would also likely warrant an update of the model - this is not a common occurrence.
Butte County	What is the status of including information from the Camp Fire into the model?	<p>The 2020 RTP/SCS includes assumptions, developed in May 2019, which account for the Camp Fire using the best available information at that time. The 2020 RTP/SCS was adopted by the BCAG Board in December of 2020 and is scheduled to be incorporated into the SB 743 model, as part of the SB 743 Implementation Study, by June 2021.</p> <p>Several of the modeling assumptions included in the 2020 RTP/SCS will change with the work being completed by BCAG as part of the Post Camp Fire Regional Study. A revised travel model is being developed for the Post Camp Fire Regional Study which includes updated regional growth forecasts and analysis years (2020, 2025, 2035, and 2045). BCAG will coordinate with the stakeholder group and project consultant in determining if the Post Camp Fire Regional Study travel model will be incorporated into the SB 743 model. The Post Camp Fire Regional Study is currently scheduled to be completed in May 2021.</p>
Butte County	When referencing areas such as LA and OC could more rural examples be highlighted to reflect similar conditions to Butte County?	Fehr & Peers project experience with VMT also includes rural areas such as El Dorado, Humboldt, Tahoe, and Placer County. Nevada County is outside MPO boundary.
Butte County	During the next stages (March and April Stakeholder meetings), how will BCAG and Fehr & Peers help guide local agencies?	Fehr & Peers plans to narrow down the choices to the top two or three best options. The choices have been reduced after reviewing court challenges over VMT. BCAG will assist with choosing top options but does not make an ultimate decision on how local agencies proceed.
Butte County	What data point is currently being used 2018, 2020, 2045? How are we going to update post Camp Fire will the screening tool be updated in the future?	The base year model is 2018. The 2020 version is a forecast year based off new input-based estimate that has been reran and compared. The Camp Fire study will provide BCAG with additional information that is being updated in the model.
Butte County	Has there been a trend of abandoning LOS in favor of VMT?	There has not been a trend but in urban areas there is not as much road building left which allows for more separate bike/ped and transit programs.
Caltrans	Is it possible to have a model that produces information on both car and truck VMT data?	BCAG model can produce VMT for vehicles separately or all together. The model should be used based off purpose of the analysis.
City of Chico	Is there an GHG equivalent for VMT?	Yes, one VMT is equivalent to one pound of CO2. The only way to reduce VMT is through changing the project. The issue occurs during the cost of development because when the impact fee programs don't exist, they can't create mitigation it can also create a higher cost of development.
City of Chico	How can you monitor if the mitigation is being used?	The way to monitor the mitigation is through surveys. There are available resources like StreetLight data that can track how the mitigation is being used. The data is important to prove the use of the VMT reduction in monitoring the program. The use of traffic counts and trip generations of the projects are also used to monitor VMT produced per project.
Butte County	How does electric vehicles verse gas powered vehicles change the trend of VMT? How is it shown in the model?	VMT in electric vehicles and transit busses does not change the VMT because it still does not address equity even if all vehicles were electric you still would need VMT analysis.
City of Chico	Does the 15% threshold statewide come from OPR state goals?	The 15% threshold statewide did have state goals in mind
Butte County	Has there been discussion as to why the 15% reduction applies to both rural and urban communities?	There have been conversations at the state level to think of rural areas differently, but nothing has changed. There has been discussion to use qualitative thresholds as the state has a need to further evaluate rural areas.
Butte County	Is there another way to look at VMT instead of regional average? Instead of the 15% below average outlined.	There is an option to use the OPR regional or citywide average. Lead agencies have discretion to choose their own VMT thresholds, but must support them with substantial evidence. There is also an option to look at VMT according to a sub-regional basis which allows for comparison of VMT performance within similar land use areas. It is an option to use a sub-regional boundary instead of the city limits.
City of Chico	How would a local planner without expertise derive VMT threshold? What software is used for the BCAG model? VMT tool?	The VMT screening tool will give VMT generation rates that is useful when looking up different zones. The VMT screening tool is accessed through an internet browser. The BCAG model is accessed through a software called "Cube" that uses a specific engine that runs the model. Brian would provide the input files to perform the model runs.
City of Chico	Is there an incentive for the County to approve projects outside county lines with potential for lower VMT?	The residential VMT map shows that areas on the edge of Chico do have low VMT. The County could choose to screen residential projects in these areas.