



City of Santa Barbara
Public Works Department

MASTER ENVIRONMENTAL ASSESSMENT GUIDELINES FOR TRANSPORTATION ANALYSIS December 2023

California Environmental Quality Act (CEQA) Transportation Assessments are required for environmental documentation in conformance with Resources Code section 21099 directing lead agencies to use criteria for determining the significance of transportation impacts to “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.”

Santa Barbara, as a CEQA lead agency, developed the analysis methodology, significance thresholds and mitigation measures to address potential significant impacts in accordance with [Title 14](#), Natural Resources, Division 6. California Natural Resources Agency, Chapter 3. Guidelines for the Implementation of the California Environmental Quality Act.

As of July 1, 2020, CEQA analysis for determining potential significant transportation impacts from vehicle trips transitioned from the use of an automobile delay or capacity measure to the use of a Vehicle Miles Traveled (VMT) metric. This transition in evaluating a project’s environmental impacts under CEQA was required by Senate Bill (SB) 743. Traffic impact studies using methodologies and determination based on measures of vehicle delay or congestion are no longer applicable for CEQA transportation analysis.

CEQA Guidelines section 15064.3 establishes VMT as the most appropriate measure of transportation impacts, shifting away from the level of service analysis that evaluated a project’s impacts on traffic conditions on nearby roadways and intersections.

Section XVII of Appendix G of the State CEQA Guidelines (Environmental Checklist) includes the following transportation thresholds to be addressed in an initial study.

Would the project:

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- d) Result in inadequate emergency access?

When is a CEQA Transportation Analysis Required?

A CEQA Transportation Analysis is required for any project undergoing review pursuant to CEQA, that is not otherwise exempt. A project may be presumed to have a less than significant impact on transportation if it meets one or more screening criteria. A project that does not meet screening criteria would require further study to determine potential significant impacts.

The four outcomes of CEQA Transportation Analysis for a project are:

1. **Screened from Further Analysis:** Screened from analysis and presumed to be less than significant based on screening thresholds (as described in the following section)
2. **Less than Significant:** Not screened from analysis; CEQA Transportation Analysis is conducted which found the project to be less than significant
3. **Less than Significant After Mitigation:** Not screened from analysis; CEQA Transportation Analysis is conducted which found the project to be potentially significant, however feasible mitigation measures are applied and the project achieves less than significant transportation impacts after mitigation
4. **Significant:** Not screened from analysis; CEQA Transportation Analysis is conducted which found the project to be potentially significant, feasible mitigation measures are applied, but the project cannot achieve less than significant transportation impacts after mitigation. The project would then be required to go through the Environmental Impact Report (EIR) process.

CEQA Analysis Framework

CEQA transportation analysis in the City is focused on the impact of automobile and light truck VMT from residents and employees. A project will be analyzed for the entire VMT of their trips, including outside of the City. A project's VMT will be analyzed and assessed on a per capita, per employee, or per service population (population and employees) basis in order to use an efficiency-based metric. These are compared to a threshold value to determine if a potential significant transportation impact exists. VMT from heavy trucks are not a component of the CEQA transportation analysis.

The tool used to calculate VMT and efficiency metrics of VMT will be the Santa Barbara Travel-Demand Forecasting Model (SBTDFM). This land-use based model was developed by Iteris, as a subarea model of the Santa Barbara County Association of Governments (SBCAG) travel demand model. Iteris utilized the SBTDFM to generate the VMT statistics. The model consists of a 2020 base year scenario (validated to 2020 conditions, pre-COVID) and 2035 future year scenario. The model consists of a detailed traffic analysis zone (TAZ) structure in the City of Santa Barbara, comprised of over 300 TAZ's within the City. The average VMT per capita, per employee, or per service population for the 2020 base year scenario is included in Appendix A for the both the Growth Management Program Development Areas as well as the entire City of Santa Barbara, for use in VMT assessments. These values would be updated after future updates to the SBTDFM which account for land use and transportation changes.

In cases where the project generates less than 1,000 vehicle trips per day, projects may be analyzed using the average VMT by trip type from the Growth Management Program Development Area in which the project is located. VMT is primarily a function of the location of a project and projects that generate fewer than 1,000 vehicle trips per day are unlikely to alter the VMT efficiency of a Growth Management Program Development Area. Therefore, a project that generates less than 1,000 vehicle trips per day can be assumed to have the same average VMT characteristics as the Growth Management Program Development Area where it is located. The conditions by which these approaches shall be applied are discussed in the following sections.

The most appropriate type of analysis will be approved by the City as the CEQA lead agency. The format of the CEQA Transportation Analysis would vary depending on the requirements of the environmental documentation, however it must conform to these guidelines.

Screening Criteria

Since SB 743 is intended to provide CEQA relief to projects that support the State's GHG emission goals, the screening for projects presumed to have less than significant impacts is intended to incentivize development in areas where vehicle trips are shorter or where other modes of transportation are supported. The screening criteria therefore limits the technical analysis of CEQA transportation impacts to those projects which have the potential of significant impacts.

The State Office of Planning and Research (OPR) Technical Advisory identified project conditions to be reviewed at the CEQA Checklist stage to determine if a project can be presumed to have a less than significant CEQA transportation impact or if a specialized study in conformance with these guidelines is required for the determination. Consistent with OPR guidance, project conditions that may be presumed to have less than significant CEQA transportation impacts include the following:

- Small projects
- Projects located within ½ mile of an Existing Major Transit Stop or ¼ mile of an Existing High-Quality Transit Corridor
- Neighborhood serving retail
- Affordable housing
- Accessory building or Accessory Dwelling Units (ADU's)

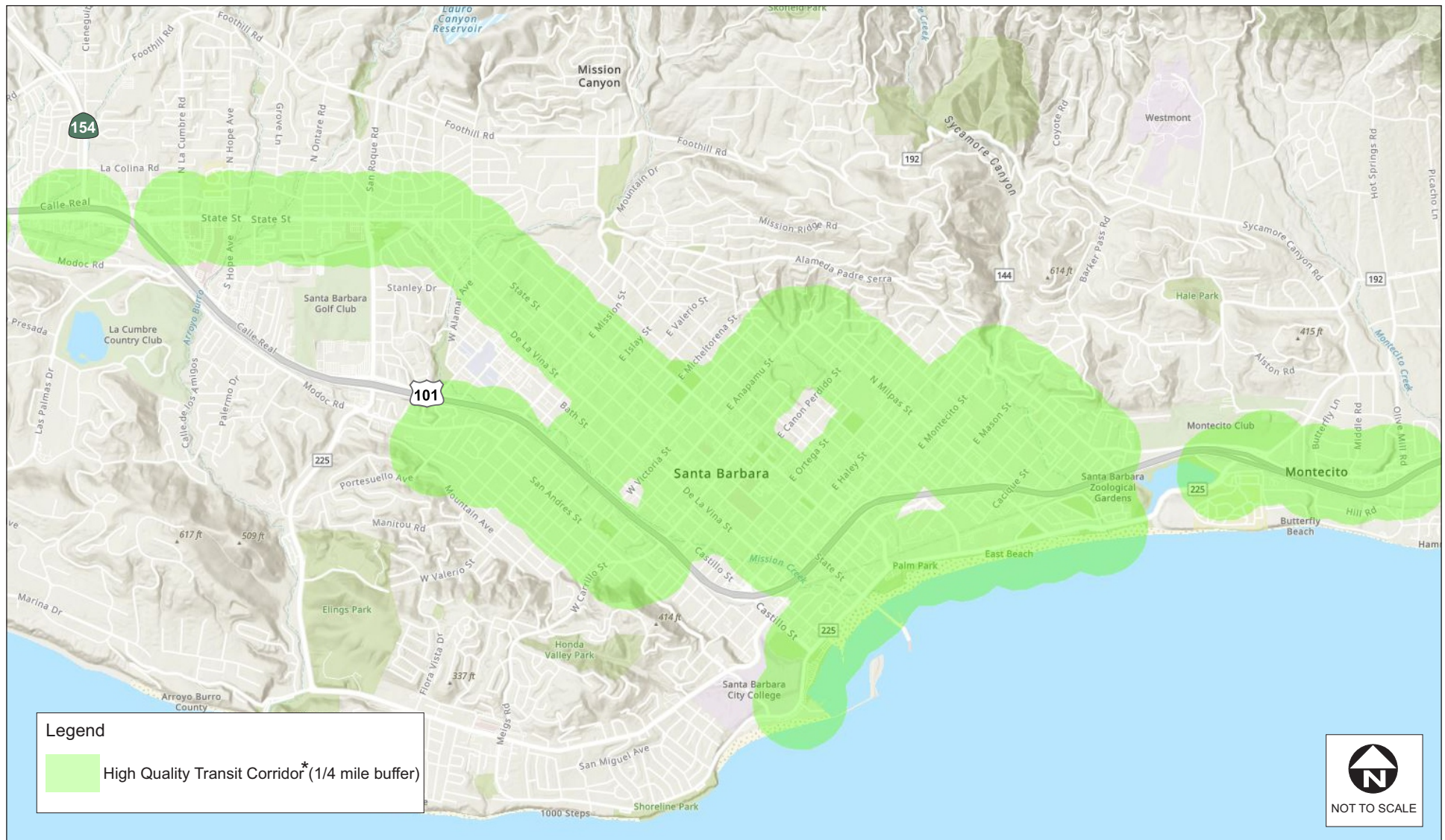
Small Projects

Small projects may be presumed to have a less than significant CEQA transportation impact. A small project is defined as a project that generates 250 or fewer daily net vehicle trips on an average weekday. A table presenting the average daily traffic (ADT) trip generation rates for various land use types is provided in **Appendix A**.

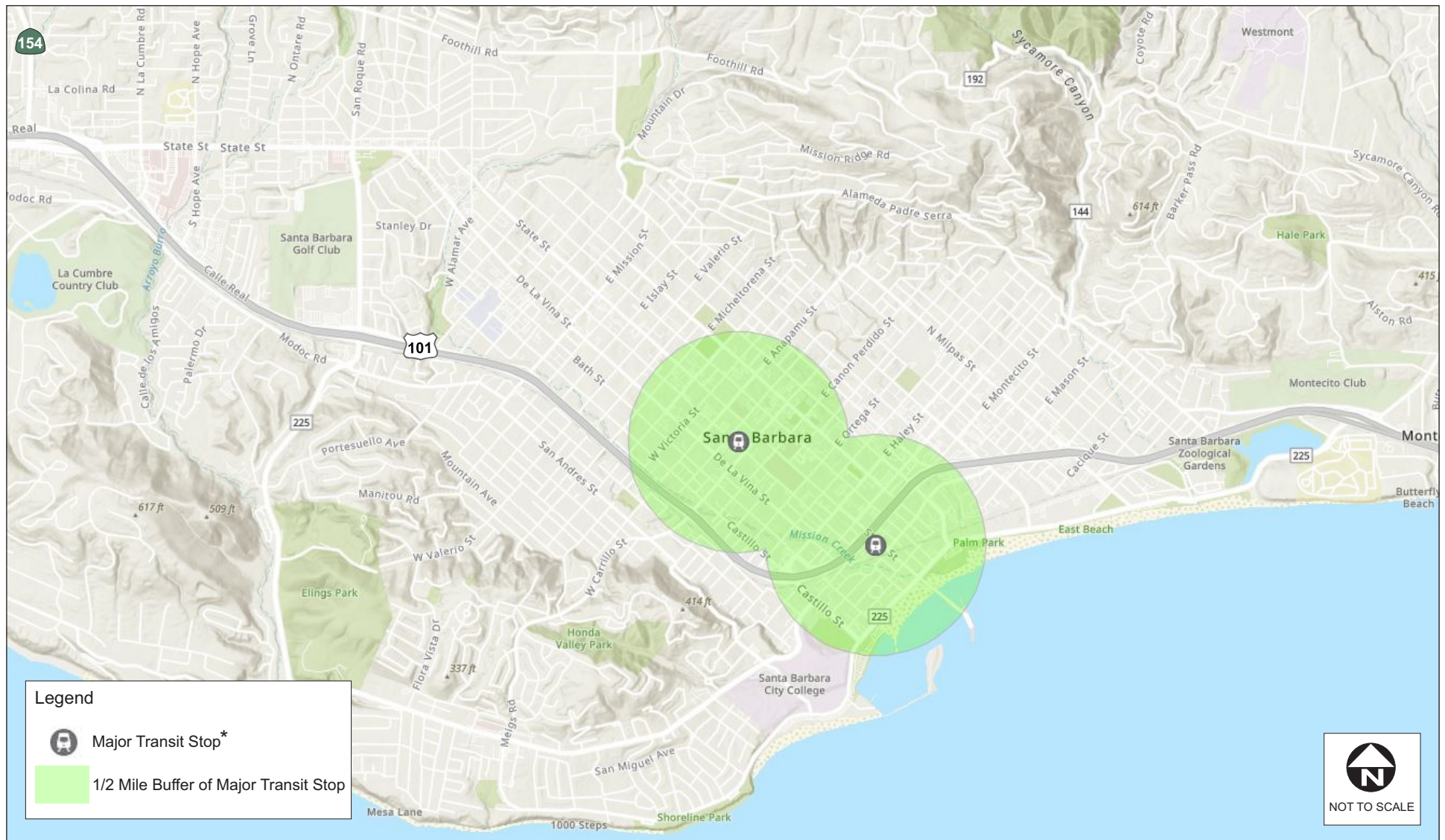
Projects located within ½ mile of an Existing Major Transit Stop or ¼ mile of an Existing High-Quality Transit Corridor

Projects located within ¼ mile of an existing High-Quality Transit Corridor (HQTC) may be screened out from further analysis, for consistency with CEQA guidelines.

Figure 1 shows the HQTC's to be applied in this screening evaluation. In addition, projects located within ½ mile of an existing major transit stop may be screened out from further analysis. **Figure 2** shows the existing major transit stop locations. For the most current HQTC's and major transit stop locations, please always reference SBCAG's Regional Transportation Plan/Sustainable Communities Strategy ([SBCAG Transit GIS Storymap](#)).



* High Quality Transit Corridor = corridor with fixed route bus service, with service intervals no longer than 15 minutes during peak commute hours



* Major Transit Stop = an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more bus routes with headways of 15 minutes or less during peak commuting periods

Neighborhood Serving Retail

Retail development that is 50,000 net square feet or less is likely to be local-serving, resulting in short vehicle trips. As such, a retail project that is 50,000 net square feet or less is presumed to result in a less than significant impact, consistent with CEQA Guidelines Section 15064.3, subdivision (b).

Affordable Housing

Projects that consist of 100% affordable housing may be presumed to have a less than significant CEQA transportation impact. If a project contains affordable housing units, the affordable housing units can be removed from the VMT assessments for the purposes of determining project size under the small project screening. For example, if a 40-unit project includes 10 affordable housing units, then the project's potential for small project screening would be based on the remaining 30 (market rate) units.

Analysis Methodology

Projects inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)—presumed to have a less than significant transportation impacts on the basis of a VMT efficiency metric—would undergo a CEQA VMT Transportation Analysis. There are two types of assessments that can be performed:

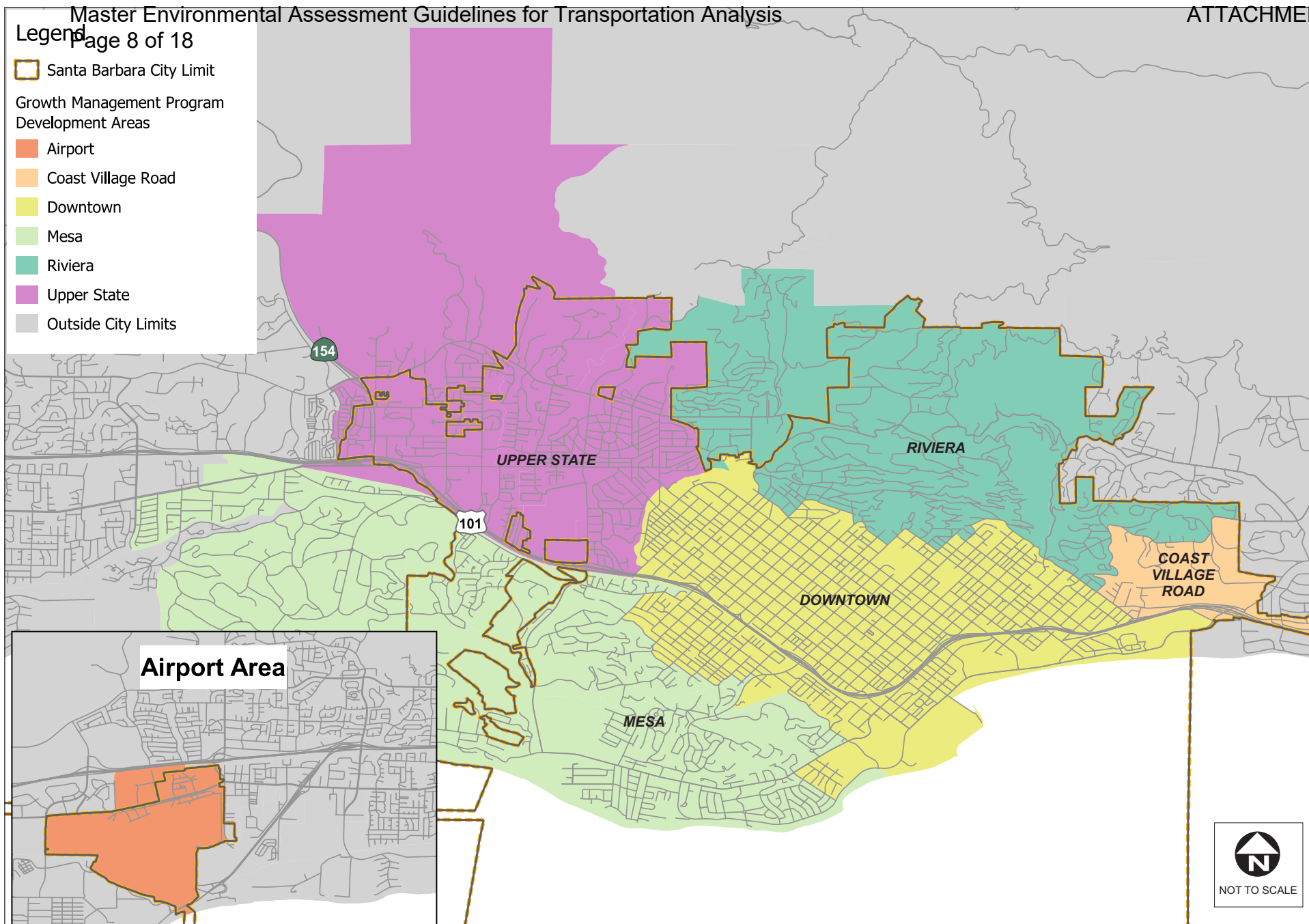
1. For medium-sized projects (greater than 250 and below 1,000 net vehicle trips generated per day), a project can be assumed to have the VMT characteristics of the Growth Management Program Development Area where it is located (shown in **Figure 3**). Growth Management Program Development Areas include Downtown, Airport, Coast Village Road, Mesa, Riviera, and Upper State. Those values are shown in **Appendix B**. Any VMT reduction strategies included as part of the project would apply appropriate reductions in this subarea analysis.
2. For large projects (1,000 or more net vehicle trips generated per day), City Transportation Planning staff will coordinate with a City-appointed consultant to perform a focused scenario analysis using the SBTDFM, or other similar model/tool as approved by the City to determine the project's VMT.

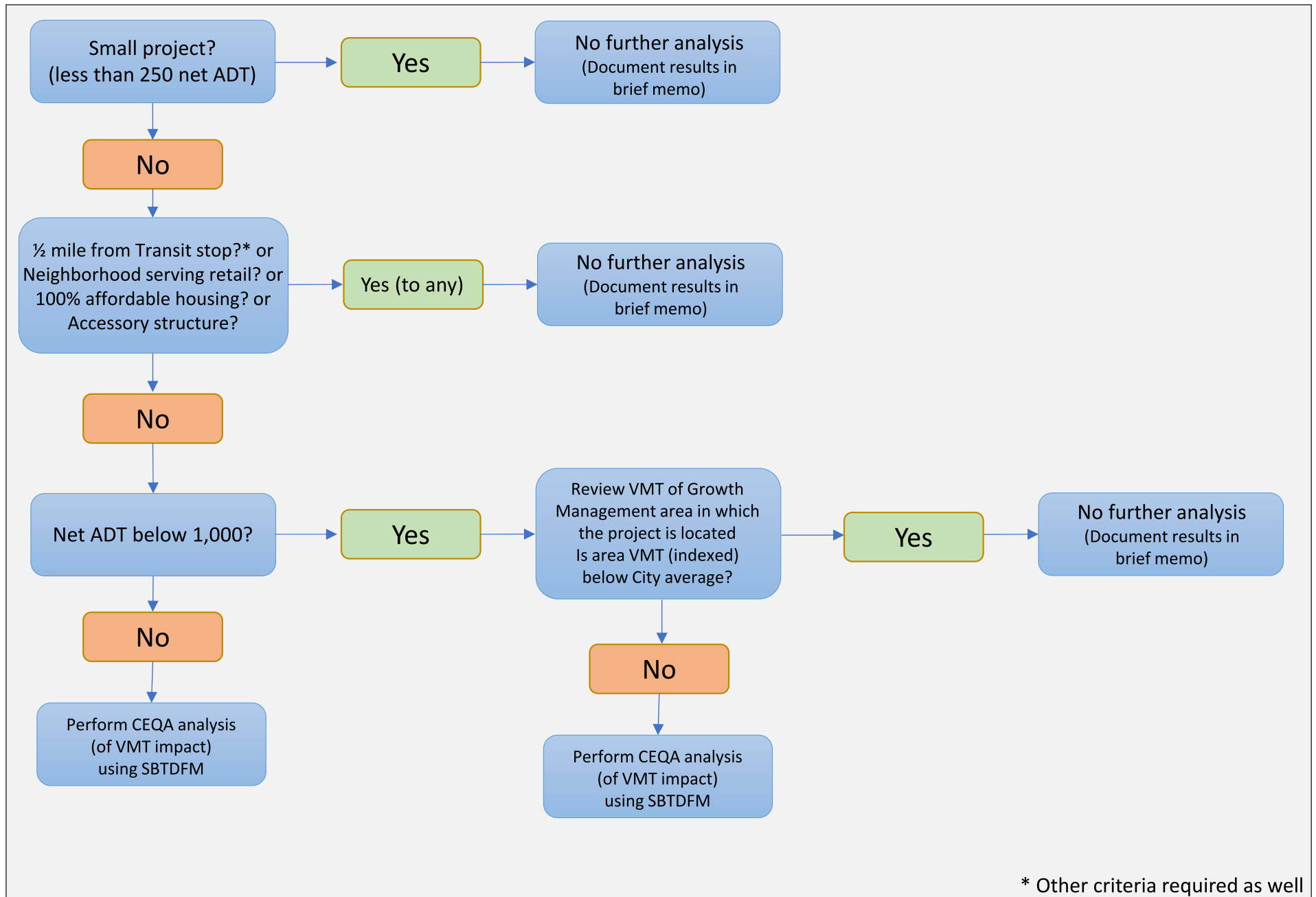
Figure 4 presents a flow chart describing the screening process, used to determine the type of analysis that would be required for land development projects.

Legend
 Santa Barbara City Limit

Growth Management Program
 Development Areas

-  Airport
-  Coast Village Road
-  Downtown
-  Mesa
-  Riviera
-  Upper State
-  Outside City Limits





For large projects, VMT assessment is split by land use and trip type components of home-based (residential) VMT and work-based (employment) VMT. The VMT will be indexed by the number of residents and the number of employees respectively. Therefore, the VMT metrics are described in the three following categories:

- **Residential VMT per capita:** Home-Based Production VMT / Residential Population
- **Employment VMT per employee:** (Home-Based Work Attraction VMT + Work-Based Production) / Number of Employees
- **VMT per service population:** Total Production and Attraction VMT / Residential Population + Number of Employees. Note the VMT per service population includes other types of VMT such as retail trips.

The appropriate use of these metrics per land use type is provided in **Appendix C**. In order to develop the VMT component of the metrics, travel demand model outputs by trip purpose, as well as productions and attractions, must be considered. The delineation of productions and attractions include both ends of an origin and destination trip. For example, production VMT for home-based work trips represents the total VMT of all commute trips of residents within the City, traveling to and from wherever they work. The attraction VMT represents the VMT of all people commuting to and from the City for work no matter where they live.

A project's estimated number of residents, to be included in the model TAZ for a proposed project, will be based on city average, as was applied per the SBTM Model Development Report.

Thresholds of Significance

A key step in the environmental review process is to determine whether a project may cause a significant effect on the environment. The State's CEQA Guidelines Section 15064 defines a threshold 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."

In this section, threshold options for the following types of projects are identified:

- Land Development projects;
- Land Use Plan projects; and
- Transportation projects.

Land Development Projects

Based on review of VMT outputs of the City, it is recommended that the following criteria be adopted for the evaluation of land use development projects:

- A project's impact shall be considered less than significant if the Base Year With Project scenario project VMT (per capita, per employee or per service population as appropriate) is below the Existing/Base Year (2020) citywide average VMT.

Note that the project VMT and citywide VMT outputs shall be from the same model and model version as to be internally consistent for the CEQA determination.

Land Use Plans

Land use plans are defined as General Plans, Specific Plans, and Master Plans. Typically, these types of projects include developments made up of larger geographies than a standalone land development project. Given the large geographies, it is recommended that the following criteria be adopted for the evaluation of land use plans:

- A project's impact shall be considered less than significant if the Future Year With Project VMT/Service Population (or per Capita if residential-only) of the project area is below 15% below the Base Year (2020) SBCAG region average VMT/Service Pop (or per Capita).

Note that the project VMT and SBCAG region VMT outputs shall be calculated from the same model and model version, as to be internally consistent for the CEQA determination, and use the origin/destination method for VMT calculation.

Transportation Projects

Transportation projects that would be exempt from further analysis are presented in **Appendix D**. For transportation projects that are not exempt, it is recommended that the following criteria be adopted for the evaluation of transportation projects:

- A project's impact shall be considered less than significant if the Base Year With Project scenario link-based VMT is below Existing/Base year scenario link-based VMT (for a defined study area that shall be confirmed with the City). Thus, the link-based method for VMT calculation should be used for this evaluation.

As such, the VMT outputs would not be indexed to population or employment.

VMT Reduction Strategies

VMT reduction strategies can either be project components or mitigation measures that reduce the assessed travel demand model VMT of a project. If a significant transportation impact is identified for a project, the Project applicant will be required to submit a mitigation plan to reduce impacts to less than significant. **Appendix E** lists potential on-site and off-site VMT reduction strategies and their expected maximum level of effectiveness in reducing VMT for use in project assessments.

APPENDIX A – TRIP GENERATION RATES

The following are average daily trip generation rates for several land use types. These rates are to be used as a preliminary guide to determine a project's potential trip generation, for screening purposes. In the case of mixed-use developments, discounts for internal trip capture may be applied.

Table A-1: Daily Trip Generation Rates

Land Use	Daily Trip Generation Rate	Maximum Threshold for Small-sized Project	Maximum Threshold for Medium-sized Project
Single-family Detached Housing	9.43 trips/du	26 units	106 units
Multifamily Housing	6.74 trips/du	37 units	148 units
Affordable Housing	4.81 trips/du	51 units	207 units
General Office	10.84 trips/tsf	23 tsf	92 tsf
Medical-Dental Office	36.00 trips/tsf	6 tsf	27 tsf
Retail (small plaza)	54.45 trips/tsf	4 tsf	18 tsf
Fast-food Restaurant (no drive-through)	450.49 trips/tsf	Does not qualify for small project exemption	2 tsf
High-Turnover (Sit-Down) Restaurant	107.20 trips/tsf	2 tsf	9 tsf
Supermarket	93.84 trips/tsf	2 tsf	10 tsf
Coffee/Donut Shop (no drive-through)	93.08 trips/tsf	2 tsf	10 tsf
Hotel	7.99 trips/room	31 rooms	125 rooms
Industrial	4.87 trips/tsf	51 tsf	205 tsf
Athletic Club	~45.00 trips/tsf*	~5 tsf	~22 tsf
Gas Station	172.01 trips/fueling station	1 fueling station	5 fueling stations
Drugstore/Pharmacy (no drive-through)	90.08 trips/tsf	2 tsf	11 tsf

du = dwelling unit; tsf = thousand square feet

* Daily trip rate estimated based on ITE peak hour rates, as no daily rates are provided for this land use category

APPENDIX B – VMT CHARACTERISTICS BY GROWTH AREA

The following are outputs of the SBTDFM for the 2020 base year scenario. These outputs are the average VMT per capita, per employee, or per service population in the 2020 base year scenario for the Growth Management Program Development Areas, as well as the entire City of Santa Barbara. These values are presented for use in CEQA VMT assessments and would be updated after any future updates to the SBTDFM.

The values are calculated as such:

- VMT per Capita is the home-based VMT divided by population
- VMT per Employee is the work-based VMT divided by number of employees
- VMT per Service Population is the sum of home-based VMT, work-based VMT and other VMT divided by the sum of population and number of employees.

Table B-1: VMT Characteristics - SBTDFM 2020 Base Year Scenario

Area	VMT per Capita	VMT per Employee	VMT per Service Population
Downtown	10.0*	17.7*	23.7*
Mesa	12.7	36.9	27.1
Upper State	10.3*	36.8	32.5
Riviera	10.1*	36.6	20.6*
Coast Village Road	16.3	50.4	36.0
City Average	10.8	22.3	25.8

* Growth Management Program Development Area value below City average

APPENDIX C – VMT METRICS PER LAND USE TYPE

The following table shows the appropriate VMT metric to use per project land use type.

Table C-1: VMT Metrics per Land Use Type

Land Use	VMT per Capita	VMT per Employee	VMT per Service Population
Residential only	X		
Mixed-use Residential/Office, Residential/Retail			X
Mixed-use Office/Retail		X	
Office		X	
Retail		X	
Hotel		X	
Industrial		X	
Specific Plans, Master Plans			X

APPENDIX D – EXEMPT TRANSPORTATION PROJECTS

The following table presents the types of transportation projects that would be exempt from further CEQA analysis (i.e., impacts presumed to be less than significant).

Table D-1: Exempt Transportation Projects

Project Type
Roadway rehabilitation projects that do not result in a net increase in travel lanes/capacity
Roadway shoulder improvements
Reduction in the number of through lanes
Addition of vehicle travel lanes not for through traffic (i.e., left-turn or right-turn pockets, two-way center left-turn lanes)
Addition of an auxiliary lane of less than 1 mile
Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, or emergency breakdown lanes that are not utilized as through lanes
Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel
Addition of roadway capacity on local or collector street, provided the project also improves pedestrian, cyclist, and, if applicable, transit access
Addition of a lane used strictly for transit vehicles
Initiation of a new transit service
Addition of a roundabout or traffic circle
Traffic flow conversion (one-way to two-way operation or vice versa) without a net increase in vehicle travel lanes/capacity
Timing of signals to optimize vehicle, bicycle, or pedestrian flow
Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles
Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
Addition of off-road bike paths or trails serving non-motorized travel
Addition of bicycle parking

Project Type
Removal or relocation of off-street or on-street parking spaces
Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
Addition or reconfiguration of traffic calming devices
Traffic metering systems
Adoption of or increase in tolls
Addition of traffic wayfinding signage
Rehabilitation and maintenance projects that do not add motor vehicle capacity
Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel
Installation of publicly available alternative fuel/charging infrastructure
Addition of passing lanes in rural areas that do not increase overall vehicle capacity along the corridor

APPENDIX E – VMT REDUCTION MEASURES

Application of VMT reduction measures to reduce a potential significant impact require special conditions of approval as part of a mitigation program to ensure mitigation monitoring and enforcement is in place. In order to guide decisions of appropriate and feasible mitigation measure options, **Table E-1** summarizes on-site measures and their maximum level of effectiveness for consideration.

The mitigations could reduce VMT and greenhouse gas (GHG) emissions by avoiding vehicle travel by site users through promotion of alternative modes, carpooling and avoided trips strategies to reduce travel to and from a project site. The maximum potential effectiveness of these measures are quantified using industry standard methods as developed by the California Air Pollution Control Officers Association (CAPCOA) in their Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (August 2021) and the Quantifying Greenhouse Gas Mitigation Measures report (August 2010) by CAPCOA.

Table E-1: On-Site VMT Reduction Measures

Type	Strategy	Max VMT Reduction for Target
Parking or Road Pricing/ Management	Unbundle Residential Parking Costs from Property Cost ¹	15.7%
Neighborhood Design	Implement Preferential Rideshare Parking Program ²	1.0%
	Provide Bike Parking (one space per bedroom) in Multi-Unit Residential Projects ²	0.5%
Trip Reduction Programs	Provide End of Trip Facilities (such as on-site food service, gym, shower) ²	4.4%
	Provide Employer-Sponsored Vanpool ²	20.4%
	Provide Ridesharing Program ²	8.0%
	Integrate Affordable and Below Market Rate Housing (above minimum inclusionary requirements)	1.2%
	Locate Project near Bike Path (Class I)/Bike Lane (Class II or IV)	0.6%
	Locate Bike Path (Class I)/Bike Lane (Class II or IV) on Project site	3.0%

1. Refer to the City's Zoning Code for requirements in the Project's area
2. Refer to the City's Transportation Demand Management Ordinance

Table E-2 summarizes off-site measures to be considered, for inclusion in the CEQA guidelines, as a means of reducing a project's VMT output.

Table E-2: Off-Site VMT Reduction Measures

Type	Strategy	Max VMT Reduction
Neighborhood Design	Expand Bikeway Network ¹	0.5%
	Construct or Improve Bike Boulevard ¹	0.2%
	Provide Traffic Calming Measures	1.0%
	Construct or Improve Bike Facility ¹	0.8%
	Dedicated Land for Bike Trails/Facilities	0.8%
Parking or Road Pricing/Management	Implement Market Price Public Parking (On-Street)	30.0%
	Implement Area or Cordon Pricing ²	22.0%
Transit	Provide Local Shuttles	2.5%
	Provide Bike Parking Near Transit ¹	0.09%
	Increase Transit Service Frequency/Speed	11.3%
	Extend Transit Network Coverage or Hours	4.6%
	Implement Transit-Supportive Roadway Treatments	0.6%
	Microtransit NEV (neighborhood electric vehicles)	12.7%
	Addition of bus stop along property frontage	8.2%
	Implement School Pool Program	15.8%

1. Refer to the City's Bicycle Master Plan

2. Cordon Pricing is a method of road pricing that charges drivers at the entry points of a specific area