

## Pros and Cons of Potential VMT Baselines

### ***Citywide Average – Residential Projects***

Pros	Cons
<ul style="list-style-type: none"><li>• The existing residential citywide average VMT in Sunnyvale is very low, which indicates that residents do not have to travel far for everyday needs. By using the citywide average, new developments will be required to ensure their projects are more aggressive in reducing VMT.</li></ul>	<ul style="list-style-type: none"><li>• Using the citywide average VMT would require the most transit-oriented projects; however, it may be problematic in that it will be difficult for some housing projects to achieve the threshold requirement if they are not able to mitigate to the threshold or are located outside the one-half mile transportation buffer (or do not meet the minimum 35 dwelling units/acre within the buffer).</li><li>• Projects unable to mitigate will require an EIR which takes longer and is costly.</li><li>• Mitigation for residential projects in low VMT areas typically include increasing density or diversity of land uses and are often difficult to change the project description during the environmental review for the project.</li><li>• Mitigation for residential projects in low VMT areas would then rely on public improvements such as increasing crosswalks, adding bike lanes, improving access to transit. However, in many low VMT areas, these improvements already exist.</li><li>• Mitigation would then include a TDM Program but there are relatively few effective residential TDM measures. Furthermore, the monitoring of TDM Program can be difficult without the development providing a TDM Coordinator which are not very common for residential projects</li></ul>

**Citywide Average - Office/Employment Projects**

Pros	Cons
<ul style="list-style-type: none"><li>• For employment purposes it would make the VMT threshold the easiest of the three to obtain (the citywide average is the highest for employment of the three).</li></ul>	<ul style="list-style-type: none"><li>• Within Sunnyvale, per 2017 Census, 10.5% of all employees live in Sunnyvale, and 89.5% of all employees live outside of the city. Employment VMT extends well-beyond Sunnyvale borders so it is not reasonable to define the employment baseline within Sunnyvale and then establish a VMT standard. Bay Area commuters will continue to travel between cities from residences to employment area, therefore, it is more appropriate to include VMT outside of Sunnyvale in the employment baseline.</li><li>• Citywide Employment VMT baseline does not take advantage of the many available effective TDM measures for employment projects, which employers are typically willing to implement.</li></ul>

**Countywide Average – Residential Projects**

Pros	Cons
<ul style="list-style-type: none"><li>• The map contains more green areas, areas that meet the VMT threshold. This means that more properties are screened out from needing VMT traffic analysis under CEQA.</li><li>• Many existing resources are available today that can help reduce VMT at the County level.<ul style="list-style-type: none"><li>• VTA, which oversees the CMP, is the administrator of various multimodal transportation funds and grants.</li><li>• The CMP brings Santa Clara County cities together to discuss countywide transportation projects and issues.</li><li>• The CMP program provides early notification of proposed projects in other cities, giving Sunnyvale the opportunity to participate in other land use decisions affecting Sunnyvale. transportation and land use integration extend across the city boundaries. In addition, with the pooling of resources at the county level, there is a higher potential to successfully reduce VMT.</li></ul></li><li>• Transportation projects (e.g. Light Rail or multimodal improvements) are implemented in the County level providing cost-sharing VMT reducing transportation improvements.</li><li>• Mitigation projects remain within the County and under local control.</li><li>• Our transportation agency, VTA, will be the agency receiving mitigation funds for Countywide projects and mass transit will be fundamental in supporting VMT reduction.</li><li>• The County Expressway Study, Countywide Bike Plan, Complete Streets Program and BPACs provide opportunity to implement multimodal transportation projects and will establish the multimodal transportation network necessary to promote modal shift.</li></ul>	<ul style="list-style-type: none"><li>• The countywide average VMT is not as low as the citywide average VMT and would not require projects to reduce VMT as much as using the citywide average.</li></ul>

### **Countywide Average - Office/Employment Projects**

Pros	Cons
<ul style="list-style-type: none"> <li>• Lower than the citywide average VMT; therefore, office/employment projects will need to be more aggressive in reducing VMT than the citywide average VMT.</li> <li>• Provide consistency by aligning countywide VMT reduction targets with available resources today.</li> <li>• Countywide average VMT is fairly consistent across the three defined regions (citywide, countywide, and nine bay area region).</li> <li>• Many existing resources are available today that can help reduce VMT at the County level: <ul style="list-style-type: none"> <li>• The VTA, which oversees the CMP, is the administrator of various multimodal transportation funds and grants.</li> <li>• The CMP brings Santa Clara County cities together to discuss countywide transportation projects and issues.</li> <li>• The CMP program provides early notification of proposed projects in other cities, giving Sunnyvale the opportunity to participate in other land use decisions affecting Sunnyvale. Transportation and land use integration extends across city boundaries; and with the pooling of resources at the county level, there is a greater potential to successfully reduce VMT.</li> </ul> </li> <li>• Transportation projects (e.g. Light Rail or multimodal improvements) are implemented in the County level providing cost-sharing VMT reducing transportation opportunity.</li> <li>• Mitigation projects remain within the County and under local control.</li> <li>• Our transportation agency, VTA, will be the agency receiving mitigation funds for Countywide projects, and mass transit will be fundamental in supporting VMT reduction locally.</li> <li>• The County Expressway Study, Countywide Bike Plan, and Complete</li> </ul>	<ul style="list-style-type: none"> <li>• Higher than the regional average VMT; therefore, may result in slightly more VMT than the regional average VMT.</li> </ul>

Streets Program provide guidance on implementing multimodal transportation projects necessary to promote model shift.	
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***Regional Average – Residential***

Pros	Cons
<ul style="list-style-type: none"> <li>• The regional residential average is the highest of the three baselines. If it were selected it would screen out the most area within Sunnyvale for housing development.</li> <li>• Aggressively streamlines CEQA transportation review for residential projects</li> </ul>	<ul style="list-style-type: none"> <li>• Reducing residential VMT is more dependent on land uses within a city or county. By setting the standard too low, this may not reduce VMT in Sunnyvale</li> <li>• No CEQA requirements for any VMT mitigations for non-exempted residential projects.</li> <li>• The nine county Bay Area region used to define the regional average VMT includes counties such as Napa, Solano and Sonoma which have very different travel characteristics than Santa Clara County.</li> <li>• Using the regional average involves inclusion of some counties that are far from Sunnyvale and not necessarily similar in terms of size, density, and availability of transportation. In addition, the average does not include some of the counties closest to the City where Sunnyvale employees live (e.g. Santa Cruz County).</li> <li>• Regional mitigation and transportation improvements are costly, difficult to implement in a timely manner, and may not actually benefit Sunnyvale.</li> </ul>

***Regional Average - Office/Employment***

Pros	Cons
<ul style="list-style-type: none"><li>• Most aggressive requirements for VMT reduction resulting in deeper VMT reduction for employment projects.</li></ul>	<ul style="list-style-type: none"><li>• The nine county Bay Area regional average VMT is more aligned with San Francisco and Oakland than Santa Clara County where public transit usage is a lot higher as a mode of transportation for employees.</li><li>• Using the regional average would be the most difficult to achieve as it is the lowest of the three numbers and includes an area far larger than where most of Sunnyvale's employment base travels from, and areas with far more existing robust public transit systems (e.g. San Francisco and Oakland).</li><li>• Regional mitigation and transportation improvements are costly, difficult to implement in a timely manner, and may not actually benefit Sunnyvale.</li><li>• Reliance on lowering the regional baseline dependent on counties other than Santa Clara County where there are no systems or programs in place to evaluate and monitor other counties.</li></ul>