



MEMORANDUM

To: City of Morgan Hill Planning Commission

From: Nelson\Nygaard with contribution from City of Morgan Hill staff

Date: August 3, 2020

Subject: Addendum to Task 4 Memorandum and Response to Planning Commission

INTRODUCTION

Nelson\Nygaard has presented to the City of Morgan Hill Planning Commission on Senate Bill (SB) 743 three times: March 10, April 28, and June 23rd. This memorandum is a response by Nelson\Nygaard and City of Morgan Hill staff to requests from the Planning Commission for more information on the following:

- Travel Demand Model Inputs and Results
- VMT Mitigations
- Existing Retail Gross Leasable Areas
- Plan Bay Area
- VMT Analysis of Sample Projects

1 TRAVEL DEMAND MODEL INPUTS AND RESULTS

The Valley Transportation Authority (VTA) has built and maintains a travel demand model as required by state law. Referred to as the Countywide Travel Demand Model (the model), it is used for long range transportation and land use planning. In addition, the model has been configured to produce VMT estimates to support VTA member agency implementation of SB 743. VTA has also developed a VMT Evaluation Tool available to the public that produces parcel level estimates of VMT per capita and VMT per employee.

The base data used to calculate VMT estimates is derived from two sources: VTA's Countywide Travel Demand Model for a base year of 2015 (based on model runs, calibration, and validation in late 2019) and the San José Travel Demand Model for a base year of 2015. Travel demand models are used to calculate future travel and can therefore estimate VMT for future years, however, the base year is calibrated to past data and produces the most accurate VMT estimate.

VMT is calculated by TAZ using the trips that are generated by running the model. Generally speaking, trip generation is estimated based on the broad land-use categories. VTA's model uses the following trip purposes¹:

- Home-based Work – trips from home to work
- Home-based Shop/Other – trips produced from the home to shop or personal business trips
- Home-based Social-Recreational – trips are produced from home for social and/or recreational purposes
- Home-based Grade School – trips from home to grade school
- Home-based High School – trips from home to high school
- Home-based College/University – trips from home to college or university
- Air-passenger to San Jose Mineta International Airport – trips to SJC airport
- Non-Home-based – these trips are not produced or attracted at the home-end. Examples of these types of trips include travel from work to a restaurant during the mid-day, or from shopping to the dry cleaners.

All of the home-based trips are included in the VMT per capita calculation and the home-based work trips are used to calculate VMT per employee.

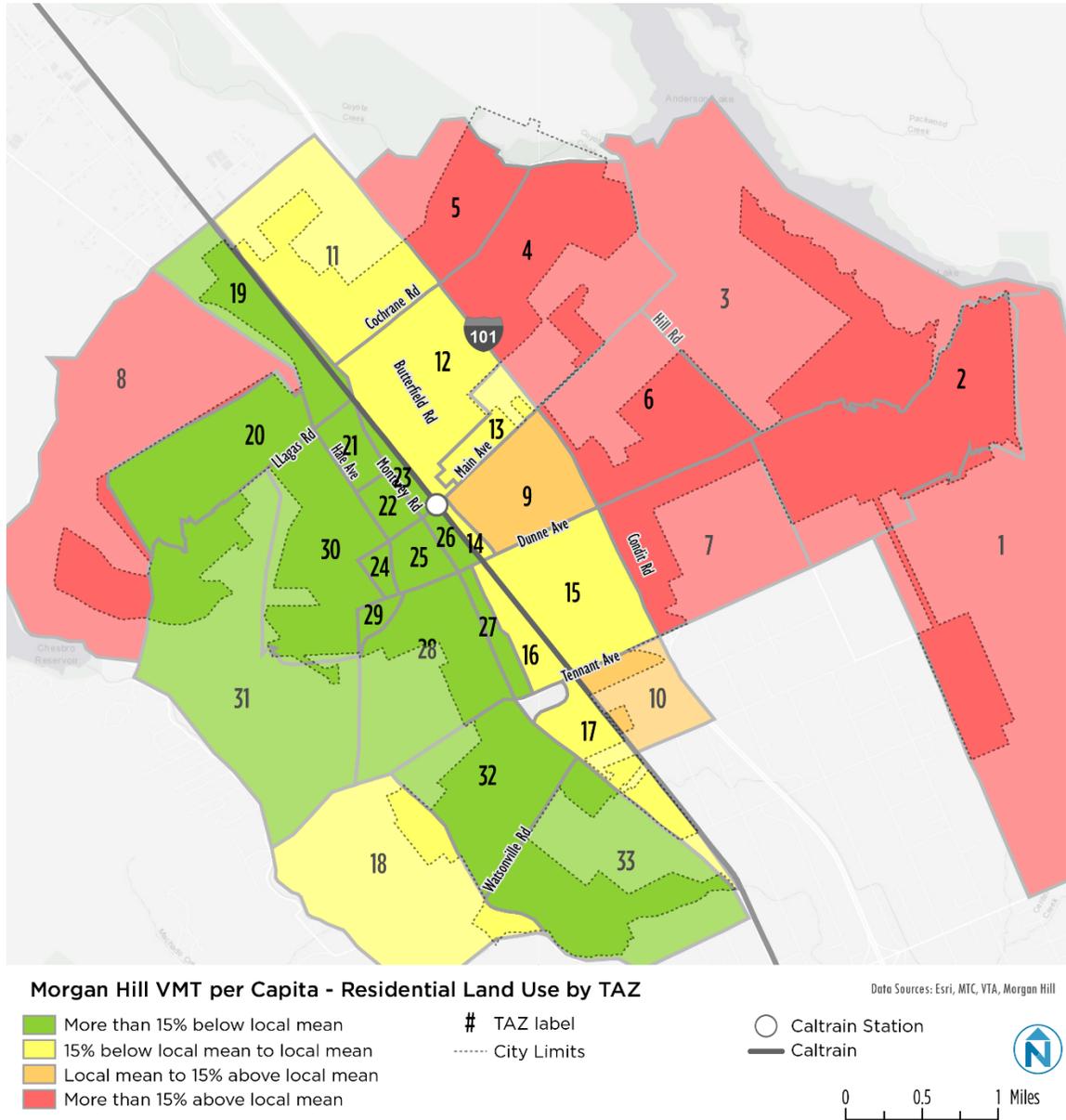
SB 743 only requires an analysis of VMT from personal motorized vehicle travel that transports people rather than goods; however, inclusion of truck VMT is allowed for ease of estimation. The VTA Travel Demand Model's VMT calculations do not include truck trips and the model does not capture truck trips to residential land uses (e.g. packages or delivery). Truck trips are modeled by VTA for employment land uses as part of transportation infrastructure planning, but not as part of the VMT per employee calculation. Truck trips are non-home-based trips and therefore are not included in the VMT per capita and VMT per employee calculation.

TAZ Size

VTA's Countywide Travel Demand Model for Santa Clara County uses land use and socioeconomic data, including population, households, employed residents, and jobs by category, to construct traffic analysis zones (TAZs). Based on VTA's Countywide Travel Demand Model, the City of Morgan Hill is comprised of 33 TAZs of varying sizes. The TAZs are mapped in Figure 1, where the relative VMT per capita of each TAZ is indicated by color. TAZ borders are shown in grey and a label number is included to distinguish between the TAZs. The average size TAZ for Santa Clara County is 0.87 square miles while the average size TAZ is nearly the same for Morgan Hill at 0.90 square miles. In Morgan Hill, smaller zones are concentrated in central areas while larger zones are located in less dense areas.

¹ Santa Clara County Transportation Authority Congestion Management Program, *Local Transportation Model Consistency Guidelines*, May 2009. Accessed via https://www.vta.org/sites/default/files/documents/local_model_consistency_guidelines.pdf

Figure 1 Morgan Hill VMT per Capita – Residential Land Use TAZs



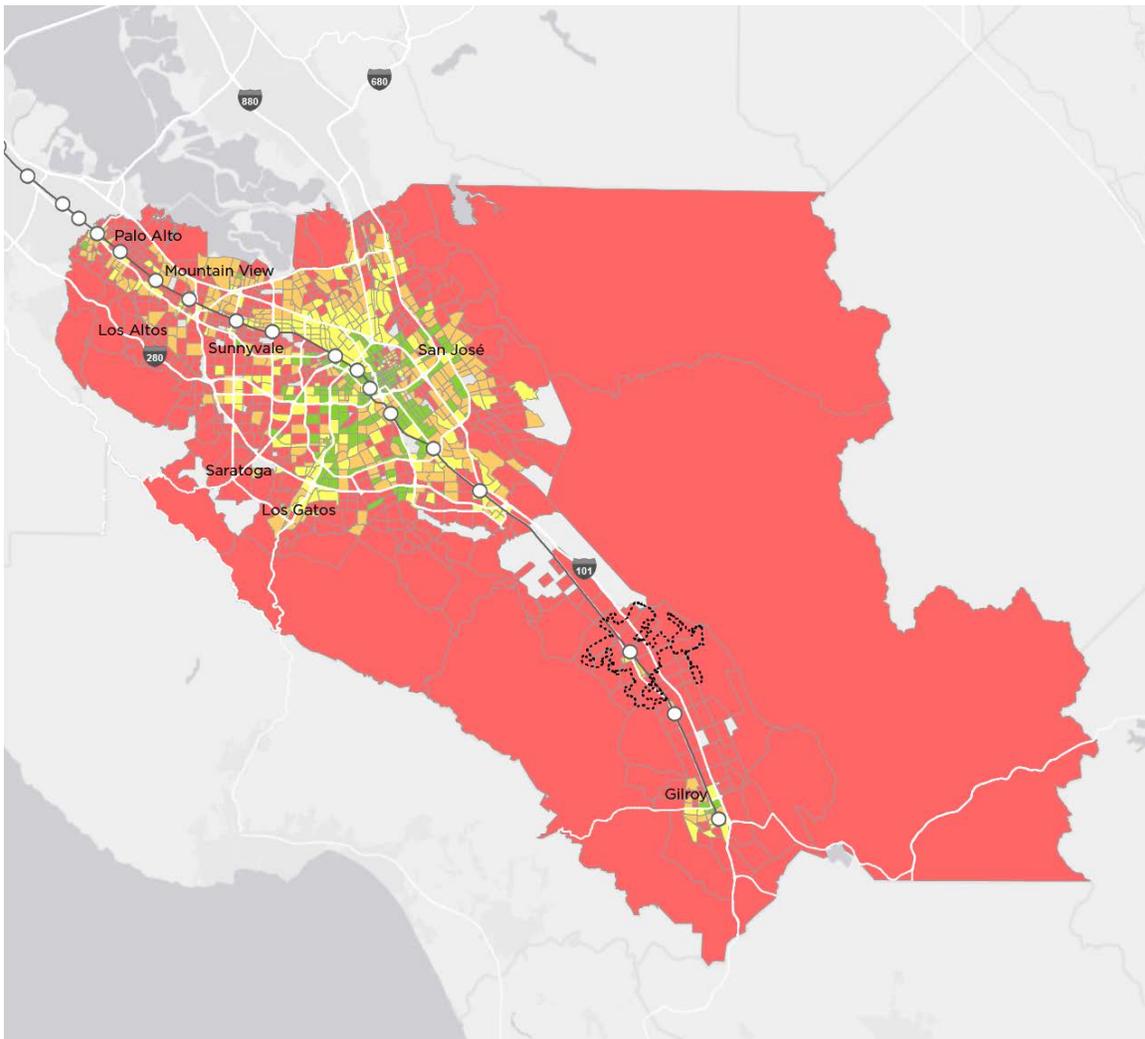
VMT at the Parcel Level

The map shown in Figure 1 shows VMT per capita at the TAZ level. VTA also offers this data at the parcel level through a “smoothing” process. The VMT is based on a TAZ average; however, the VMT of a specific parcel is based on its surrounding. The smoothing process calculates a weighted average of the VMT, population, and jobs within a half mile of a parcel to determine the VMT. This is intended to remove issues of parcels located at or near a border between TAZs, particularly ones with contrasting VMT values.

Regional VMT per Employee

Figure 2 shows a map of VMT per employee for all of Santa Clara County using the Governor’s Office of Planning and Research’s (OPR) recommended office land use threshold of 15% below existing regional average. Morgan Hill is primarily comprised of TAZs where the model indicates that employment land uses would have a high VMT per employee, and many of its peer cities also share similar characteristics. Other residential and rural cities and towns in Santa Clara County such as Los Gatos, Saratoga, and Los Altos, are mostly red. Even employment land uses in TAZs adjacent to the Caltrain corridor in job-rich cities such as Palo Alto and Mountain View, for instance, are at or above the countywide average. These results suggest that office projects in major employment areas of the region will still require substantial mitigation.

Figure 2 Morgan Hill VMT per Employee Comparison to Santa Clara County– Office Land Use



Morgan Hill VMT per Employee - Office Land Use

- More than 15% below county mean
- 15% below county mean to county mean
- County mean to 15% above county mean
- More than 15% above county mean

-- City Limits

○ Caltrain Station
 — Caltrain

Data Sources: Esri, MTC, VTA, Morgan Hill



2 VMT MITIGATIONS

Background

According to the 2019 CEQA Statute and Guidelines², mitigation measures should be identified for each significant environmental impact. In the case of transportation analysis, mitigation measures must address project VMT after July 2020. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments, and can be incorporated into the project design or plan.

To maintain consistency throughout the state, the best practice for selecting VMT mitigations calls for a clear connection between the mitigation measure and the desired mitigation outcome, and an estimate of the mitigation outcome based on best available research.

VTA's Countywide VMT Evaluation Tool

VTA developed the Santa Clara Countywide VMT Evaluation Tool (VMT Tool) for member agencies to calculate VMT of residential and employment land use projects. In addition to calculating a project's VMT per capita or VMT per employee, the tool also calculates VMT mitigations. VTA included 29 mitigations based on research from the City of San José and others. Member agencies such as the City of Morgan Hill can work with VTA to customize various functions of the tool, including defining local thresholds of significance and applicable VMT mitigation measures.

Neighborhood Type and VMT Reduction Maximums

The UC Davis Institute of Transportation Studies published *Quantifying the effect of local government actions on VMT* in 2014. The report provides a novel contribution to VMT research by categorizing neighborhood types for all of California and the relationship between neighborhood type and VMT. The neighborhood types were determined through a statewide assessment of census tracts using variables such as population density, job accessibility (distance weighted sum of jobs within 50 miles off census tract centroid), road density, percent of workers that commute by transit, housing unit median value, and other housing characteristics. The classification of neighborhood types into eight categories is presented in Figure 3; the study classified Morgan Hill's neighborhood type as *suburb with single-family homes*.

Figure 3 Neighborhood Types for VMT Analysis³

Neighborhood Type	Description
Central City Urban	Very high density, excellent accessibility, high public transit access, low single-family homes, older high-value housing stock (mostly downtown SF)

² https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2019_CEQA_Statutes_and_Guidelines.pdf

³ Salon, Deborah, Institute of Transportation Studies, University of California, Davis. "Quantifying the effect of local government actions on VMT" 2014.

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Neighborhood Type	Description
Urban High Transit Use	High density, good accessibility, high public transit access, low single-family homes, middle-aged and older housing stock (downtown LA, Berkeley, Oakland, San Francisco outside downtown area)
Urban Low Transit Use	Good accessibility, low vacancy, middle-aged housing stock (San Jose, Orange County, San Diego, LA outside downtown area)
Suburb with Multifamily Housing	Average on most indicators for the state, low single-family homes and low housing values
Suburb with Single-Family Homes (Morgan Hill's classification)	Low density and accessibility, low vacancy, high newer single-family homes and high housing values
Rural-In-Urban	These tracts have slightly better accessibility than the truly "rural" tracts, and are more likely to have multifamily housing (select tracts within urbanized areas that had been classified as "Rural")
Rural	Very low access, high vacancy, high newer single-family homes with lower housing values (mainly outside population centers of any kind)
Preserved Land	Preserved Land

VTA's VMT Tool uses neighborhood type to estimate VMT in two critical ways. First, neighborhood type is a factor in the calculation of VMT reduction effects for some mitigation measures where the results depend on the existing land use and transportation context. Second, the neighborhood type establishes maximum VMT reductions for each mitigation tier, and a global maximum VMT reduction.

VMT Reduction Maximums

VMT mitigation measures and the VMT reduction effects associated with them are not additive, but rather complementary and synergistic. Moreover, when additional measures are implemented, the marginal benefit of each new measure diminishes; this means that if a site implements 11 measures, with each estimated to reduce VMT by 10%, one would not expect a 110% overall reduction in trip-making. To prevent this kind of result, the VMT calculation methodology used by the VMT Calculator groups strategies into four tiers according to how the strategies are applied, and includes maximum reduction levels associated with each tier of strategies, based on existing research. Additional details about each mitigation tier are presented in the following section about individual VMT mitigations.

For Morgan Hill's neighborhood type the global maximum is 20%, representing the maximum reduction possible for a land use project using the VMT Tool. Maximum reductions achievable in the Suburb with Single-Family Homes neighborhood type for each mitigation tier are presented Figure 4.

Figure 4 Maximum VMT Reduction by Mitigation Tier for Morgan Hill Neighborhood Type (Suburb with Single-Family Homes)

Tier Number	Mitigation Tier Name	Maximum Reduction by Tier	Cross Tier Maximums	Global Maximums
Tier 1	Project Characteristics	10%	15%	20%
Tier 2	Multimodal Infrastructure	15%		
Tier 3	Parking	20%		
Tier 4	TDM Programs	25%	25%	

Individual VMT Mitigations

Tier 1: Project Characteristics

Tier 1 mitigation measures represent project characteristics, and these mitigation measures are listed with a description and applicable land use type in Figure 5. These are the first mitigation measures applied to a project since they are part of a project description and a project developer can use the VMT Tool to iterate and adjust the project, for example, by including more affordable housing to reduce the VMT per capita. VMT mitigation from this tier does not require ongoing monitoring. The maximum reduction for Suburb with Single-Family Homes neighborhood type for this tier is a 10% reduction.

Figure 5 Tier I Mitigations: Project Characteristics

Mitigation	Description	Land Use Type
PC01: Increase residential density	Where allowed by zoning, a project that increases residential densities compared to existing conditions in the surrounding area (half mile) will affect the distances people travel and provide greater options for the mode of travel they choose.	Residential
PC02: Increase development diversity	Where allowed by zoning, a project that increases the amount of space dedicated to mixed employment and residential uses compared to existing conditions in the surrounding area (half mile) can reduce VMT by shortening trips between land use types and accommodate more trips by non-automotive mode of transport.	Residential Employment

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Mitigation	Description	Land Use Type
PC03: Affordable housing	Projects that include on-site deed-restricted affordable, below-market rate housing can reduce VMT. Households with incomes at or below 80% of the regional median income generally make fewer trips by automobile than households with higher incomes.	Residential
PC04: Increase employment density	Where allowed by zoning, a project that increases employment densities compared to existing conditions in the surrounding area (half mile) will affect the distances people travel and provide greater options for the mode of travel they choose.	Employment

Tier 2: Multimodal Infrastructure

Tier 2 mitigation measures cover multimodal infrastructure and these mitigation measures are listed with a description and applicable land use type in Figure 6. These measures reduce VMT by providing improvements to the transportation network around the site to make non-driving trips easier, safer, and more convenient. Infrastructure measures require coordination with the City to implement and VMT mitigation from this tier does not require ongoing monitoring once the infrastructure is built. The maximum reduction for Suburb with Single-Family Homes neighborhood type for this tier is a 15% reduction.

Figure 6 Tier 2 Mitigations: Multimodal Infrastructure

Mitigation	Description	Land Use Type
MI01: Increase bike access	Bicycle facilities that close gaps in the bicycle network and/or improve the existing network improve access to a project and promote biking as an alternative to driving, reducing VMT.	Residential Employment
MI02: Improve connectivity	A project that increases the number of intersections with a ¼ mile buffer and internal connections inside the project area by building new street connections and/or connecting cul-de-sacs to provide pedestrian and bicycle access. Intersection density enhances walkability, connectivity, and street accessibility.	Residential Employment
MI03: Increase transit accessibility	A project that enhances access to transit within a ½ mile of the site will facilitate the use of transit by people traveling to/from the project site. Calculated by decreasing the walking distance from the site to the project.	Residential Employment
MI04: Traffic calming	A project that provides traffic calming measures promotes walking and biking as an alternative to driving, reducing VMT	Residential Employment
MI05: Pedestrian network	A project that improves the pedestrian connections on-site and in the surrounding neighborhood encourages people to walk instead of drive, reducing VMT	Residential Employment

Tier 3: Parking

Tier 3 mitigation measures cover parking and these mitigation measures are listed with a description and applicable land use type in Figure 7. Parking strategies only apply to employment land uses in the VMT Tool. Once built, parking measures for mitigation purposes do not require ongoing monitoring, however, some cities may opt to require monitoring of reduced parking supplies to ensure there are no spillover issues. The maximum reduction for Suburb with Single-Family Homes neighborhood type for this tier is a 20% reduction.

Figure 7 Tier 3 Mitigations: Parking

Mitigation	Description	Land Use Type
P01: Limit parking supply	Decreasing a project's parking supply compared to the ITE parking demand estimate or minimum parking required by zoning encourages employees to choose a non-driving mode of transportation to commute to work. This measure requires controlled parking nearby (permits, time limits, or meters).	Employment
P02: Provide bike facilities	Projects that provide facilities for active transportation users increases the use of active transportation modes. Examples include bike lockers, showers, personal lockers, and secure/indoor bike parking.	Employment

Tier 4: TDM Programs

Tier 4 mitigation measures consist of programs, incentives, information, and other elements that make up a TDM program, and these mitigation measures are listed with a description and applicable land use type in Figure 8. Many strategies in this tier overlap with other strategies and where there is overlap a project cannot double count the mitigating effects and should therefore select one of the overlapping strategies. This is noted in the VMT Tool as an overlap and once one overlapping strategy is selected the other overlapping strategies become greyed out. The maximum reduction for this tier is a 25% reduction, although the global maximum for Suburb with Single-Family Homes neighborhood type caps this reduction at 20%.

Unlike Tiers 1-3, most of the Tier 4 TDM programs mitigation measures require a long-term commitment from a developer and an ongoing monitoring program. Mitigation monitoring is already documented in the CEQA process and incorporated into the conditions of approval. Some cities have opted to require trip caps and annual trip counts to ensure the TDM program is effective and to allow the TDM program to be restructured as needed. Other cities require surveying to document effectiveness.

Figure 8 Tier 4 Mitigations: TDM Programs

Mitigation	Description	Land Use Type
TP01: School pool program	Project organizes a program that matches families in carpools for school pick-up and drop-off, reducing the number of driving trips.	Residential
TP02: Bike share program	Project dedicates land or provides subsidies for a bike share system, ideally one with a large footprint in the city or region. Only applies if bike share station is built on site.	Residential or Employment

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Mitigation	Description	Land Use Type
TP03: Car share program	Project provides dedicated parking spaces, subsidies, and promotions for car sharing services such as ZipCar, Car2Go, and GetAround. Car sharing supports the use of walking, biking, carpooling, and transit by providing another means for business/day trips or a guaranteed ride home option, allowing for overall reductions in auto use and VMT.	Residential or Employment
TP04: Commute trip reduction (CTR) Marketing	Project implements a marketing campaign targeting all project employees and visitors to encourage the use of transit, shared rides, and active modes. Marketing may include new employee orientation, event promotions, and publications.	Employment
TP05: Implement CTR Program	Project provides a comprehensive program to reduce the number of drive-alone commutes to the project and actively monitors and reacts to changes in mode share.	Employment
TP06: Employee parking cash-out	Requires project to offer employee parking "cash-out." Cash-out is a payment to employees who forgo use of subsidized/free parking, often set at the payment equivalent to the cost the employer would otherwise pay for the parking space.	Employment
TP07: Subsidized transit pass	Project provides either partially or fully subsidized transit passes for all project residents and/or employees.	Residential or Employment
TP08: Telecommuting and alternative work schedules	Project allows and encourages employees to telecommute (work from home) when possible or to shift work schedules to reduce commuting (e.g. compressed work week).	Employment
TP09: Free door-to-door transit (shuttle)	Project provides direct shuttle service to the Project site from areas with high concentrations of employees.	Employment
TP10: Price workplace parking	Project requires commuters to pay for parking on-site, providing a disincentive to driving and encouraging the use of other modes.	Employment

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Mitigation	Description	Land Use Type
TP11: Alternative transportation benefits	Project provides general commute benefits to employees, which may include financial subsidies or pre-tax deductions for transit, carpooling, and vanpooling activities.	Employment
TP12: Neighborhood schools	Project contributes to the development of a neighborhood school that would serve families living in the development. Neighborhood schools primarily serve the neighborhood immediately surrounding the school and allow students to walk or bike to school, reducing the use of automobiles for drop-off and pick-up trips.	Residential
TP13: Ride-sharing programs	Project organizes a program to match individuals interested in carpooling who have similar commute patterns.	Employment
TP14: Transit service expansion	Project subsidizes transit service through fees and contributions to the transit provider, thereby improving transit service to the projects, resulting in an increased use of transit and reduced VMT. Strategy must be negotiated with the City and VTA.	Residential or Employment
TP15: Targeted Behavioral intervention	Provide one-on-one counseling and encouragement, along with subsidies, to encourage individuals to use non-drive alone modes.	Residential or Employment
TP16: Unbundle parking costs	Project unbundles the cost of a parking space from the rental/sale price of the property. Residents must rent parking spaces separately from their residential space. Surrounding streets must have parking restrictions in place to enable this strategy.	Residential
TP17: Vanpool incentives	Project provides subsidies for individuals forming new vanpools for their commute.	Employment
TP18: Voluntary travel behavior change program	Project provides a program that targets individual attitudes towards travel and provides tools for individuals to analyze and alter their travel behavior. Measure includes mass communication campaigns and travel feedback programs such as travel diaries.	Residential or Employment

3 EXISTING RETAIL GROSS LEASABLE AREA

The City’s Economic Development Division generated a report through CoStar to analyze the average square footage of existing retail real estate within Morgan Hill. CoStar is a research firm that offers analytics for a full inventory of properties and spaces searchable by market and submarket for office, retail, industrial and multi-family.

As stated in Nelson Nygaard’s June 16th memo, OPR’s recommendation of a VMT screening criteria for CEQA Transportation Analysis for local-serving retail is 50,000 square feet or less. The City of Morgan Hill has a few retail business above 50,000 square feet such as Home Depot and large grocery stores. Figure 9 lists an abbreviated analysis of the CoStar Retail Tenant Frequency Report for Morgan Hill.

Figure 9 Morgan Hill Retail Analysis

Retail Type	Average Store Gross Leasable Area
Ace Hardware	23,411 square feet
Bank of America	3,000 square feet
Big 5 Sporting Goods	12,000 square feet
CineLux Tennant Station	29,292 square feet
CVS	15,000 square feet
Hobby Lobby	77,165 square feet
Joann Fabric and Craft Store	14,720 square feet
McDonald’s	3,000 square feet
Morgan Hill Bowl	35,678 square feet
Nob Hill Foods	37,000 square feet
Party City	14,704 square feet
PETCO	18,080 square feet
Rite Aid	13,000 square feet
Ross Dress For Less	23,967 square feet
Safeway	53,997 square feet
Staples	20,307 square feet
T.J. Maxx	29,559 square feet
Target	128,337 square feet
The Home Depot	103,362 square feet
ULTA	15,020 square feet
Walmart	80,000 square feet

4 PLAN BAY AREA

Plan Bay Area is a roadmap adopted by the Metropolitan Transportation Commission and the Association of Bay Area Governments to help Bay Area cities and counties preserve the character of our diverse communities while adapting to the challenges of future population growth. Plan Bay Area is a state-mandated, integrated long-range transportation and land use plan. As required by Senate Bill 375, all metropolitan regions in California must complete a Sustainable Communities Strategy (SCS) as part of a Regional Transportation Plan. In the Bay Area, the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) are jointly responsible for developing and adopting a SCS that integrates transportation, land use and housing to meet greenhouse gas reduction targets set by the California Air Resources Board (CARB).

Plan Bay Area 2040 was adopted on July 26th, 2017 and was a strategic update to Plan Bay Area (2013). The plan builds on earlier work to develop a more efficient transportation network, provide more housing choices, and grow in a financially and environmentally responsible way. Plan Bay Area 2040 describes where and how the region can accommodate 820,000 new projected households and 1.3 million new jobs through 2040; details a regional transportation investment strategy given \$303 billion in expected revenues from federal, state, regional and local sources; and complies with Senate Bill 375 which integrates land use and transportation planning and mandates both a reduction in greenhouse gas emissions from passenger vehicles and the provision of adequate housing for the region.

Plan Bay Area 2050 is currently in draft form and is not expected to be adopted until summer 2021. Plan Bay Area 2050 is a long-range plan charting the course for the future of the nine-county San Francisco Bay Area. Plan Bay Area 2050 will focus on four key issues – the economy, the environment, housing and transportation – and will identify a path to make the Bay Area more equitable for all residents and more resilient in the face of unexpected challenges. This new regional plan will outline strategies for growth and investment through the year 2050, while simultaneously striving to meet and exceed federal and state requirements.

As stated in the June 16th memo, for projects to be presumed to have a less than significant impact and be screened out of further VMT analysis, they must meet minimum criteria to support the presumption. One of the minimum criteria is that a project must be consistent with Plan Bay Area as determined by the lead agency. This is determined by the City with input from MTC/ABAG. The proposed land use should be compatible with the regional plan; an example of an incompatible project would be screening a development in an area that is identified as open space in Plan Bay Area.

Plan Bay Area 2040 calls to protect Open Space and Agriculture. The 2040 Plan meets or exceeds this because all non-agricultural development is directed within the existing urban footprint and Urban Growth Boundaries (UGB). A majority of Morgan Hill is within the UGB except for small pockets of the City in the Northwest and Northeast portion of the City. Potential map-based screens would be in compliance with Plan Bay Area.

5 VMT ANALYSIS OF SAMPLE PROJECTS

Figure 10 uses the VMT analysis recommended by the Nelson\Nygaard team to provide a high-level overview of the likely transportation impact to a sample of past projects. Figure 11 shows the projects on a map of the City along with the proposed CEQA screens.

Figure 90 Transportation Impact Review for Sample Projects

No.	Project Name	Type	Past CEQA Analysis	Proposed VMT Analysis
1	Butterfield-Keenan	Residential	Full Environmental Impact Report (EIR)	Low VMT Screen – no VMT analysis required
2	Diana-Mana	Residential	Mitigation Non Declaration (MND) (non-transportation)	Residential orange zone – substantial mitigation required
3	East-Dunne Kyono (Las Colinas)	Residential	Initial Study (IS) (non-transportation)	Residential orange zone – substantial mitigation required
4	Monterey Voices Charter School	Public Facility	MND (TIA)	Local Serving Public Facility, no VMT analysis required and inside the Transit Proximity Screen
5	Madone Parkway Carpenters Training Center	Industrial	MND (& IS)	May be able to screen out as a retail-style (visitor VMT) project, otherwise an EIR is likely required as it is located in the office and industrial red zone
6	Cochrane-Monument Land Co (Techcon)	Industrial	MND (& IS)	Transit Proximity Screen – no VMT analysis required
7	Digital - Venture Professional Center	Small office	Full EIR	Industrial and office red zone – EIR with substantial mitigation
8	Hale Avenue Extension and Santa Teresa Corridor Widening and Realignment Project	Capital Improvement	Full EIR	Phase 1 extension of Hale Avenue is a local street and not VMT inducing – no VMT analysis required Phase 2 widening of a road may be VMT inducing as an arterial – may require further study of the induced VMT demand.

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No.	Project Name	Type	Past CEQA Analysis	Proposed VMT Analysis
9	Southeast Quadrant Ball Fields	Public Facility	EIR Addendum (& IS)	Visitor VMT, recommended analysis as a retail land use. Food service uses can be screened out as local serving, fields may require an EIR to assess regional VMT impacts. Would likely have a less than significant impact but cannot be determined without further study.

Figure 11 Map of Sample Projects with Proposed Screens

