



**CITY OF DUARTE
PLANNING COMMISSION
M I N U T E S
May 18, 2020**

**Planning Commission
Commissioners**
Paula Watson-Gardner, Chair
Sara Vasquez, Vice-Chair
George K. Farra
Sheryl Lefmann
Shauna Pierce

NOTICE: Due to the state and local State of Emergency resulting from the threat of Novel Coronavirus (COVID-19), Governor Newsom has issued Executive Order N-29-20 in which Section 3 supersedes Paragraph 11 of Executive Order N-25-20 (issued on March 12, 2020) addressing Brown Act regulations. This new order states that the City does not need to make a physical location available for members of the public to observe a public meeting and offer public comment. The Order allows the City to hold City Council meetings via teleconferencing and allows for members of the public to observe and address the meeting electronically.

1. CALL TO ORDER AND NOTATION OF ANY ABSENCES:

Chair Watson-Gardner called the meeting to order at 7:07 p.m. The following were in attendance:

PRESENT:	Watson-Gardner, Vasquez, Heany, Farra,
ABSENT:	Wolff
STAFF:	Hensley, Golding, Galeazzi, Hernandez
DEPUTY CITY ATTORNEY:	Thai Phan

2. PLEDGE OF ALLEGIANCE:

Heany lead the Pledge of Allegiance.

3. APPROVAL OF MINUTES: [April 20, 2020](#)

Farra moved to approve the minutes of April 20, 2020. Seconded by Heany. The motion was approved 4-0-0-1. (Absent: Wolff)

4. ORAL COMMUNICATIONS ITEMS NOT ON THE AGENDA:

None.

5. PUBLIC HEARINGS:

- A. [Conditional Use Permit 2019-02 and Use Classification 2020-01: A request to upgrade from a Type 20 \(Off-Sale Beer and Wine\) to a Type 21 \(Off-Sale General\) Alcoholic Beverage Control license to allow for the sale of distilled spirits \(liquor\) for offsite consumption, and a Use Classification, per Chapter 19.04 of the Duarte Development](#)**

Code that liquor sales should be considered an incidental use to a grocery store use in the Town Center Specific Plan.

Attachments: [Staff Report and CUP 2019-02](#) and [Resolution 2020-04](#)

Ivan Galeazzi, Associate Planner presented a staff report, noted corrections on the conditions of approval (#2, #4, #13, #23), indicated deletion of a duplicate condition (#27), explained that in order to approve CUP 2019-02 that Use Classification 2020-01 would first have to be adopted, and welcomed questions from the Commissioners.

Farra commented on a specific condition of approval from the original beer and wine conditional use permit (CUP) approval, which prohibits the sale of small containers to prevent onsite consumption and asked for the reasoning to why there is not a condition of approval limiting the minimum bottle size required.

Planning Manager Golding addressed Farra's question regarding the previous CUP, which was approved in 2016, which limits the size of alcohol containers (beer, malt beverages, and wine) that are allowed for single serve/purchases. In addition, he explained the allowable bottle sizes are consistent with other conditionally permitted retailers that sell alcohol. Lastly, Golding discussed the added condition of approval, that signage is required to be posted on site that states onsite consumption is a violation of City and State codes.

Farra commented regarding Walmart and Target selling 375 mL that may not be an issue as it is for this location.

Chairperson closed Commissioner's inquiries and opened Public Hearing.

Steve Rawlings, Rawlings Consulting on behalf of Grocery Outlet spoke regarding the consensus of Staff recommendations and conditions; that he and his clients were in support of the extra safety measures for securing bottles and cabinets. The operator has a good track record, high quality of merchandise, and positive feedback from the community. He introduced Brian Reyes and Aron Johnston, whom are the Operators of the store; Sheldon Morgan, Director of Sales Merchandizing, Katie Sharp, ABC License specialist and welcomed commissioners' inquiries.

Farra asked Rawlings if he wanted to comment on the difference of a 375 mL versus 750 mL bottle. Rawlings referred the inquiry to Shelton Morgan to address Farra's question. Morgan explained the typical bottle sizes that are sold in their stores, stating that the San Diego stores have similar restrictions, and that is not typical to sell bottles in the 375 mL size or smaller.

Farra inquired if there are any other type of liquor that is less than 375 mL bottles. Morgan stated he is not familiar with the various types of sizes that exist, however, in their buying model the small sizes are generally not available to purchase for their store.

There were no additional comments/questions from the Commission, Chairperson closed the Public Hearing.

Farra stated the location of the store is nice, clean, well maintain and these characteristics makes residents proud. He expressed his support on the sale of liquor at the site, however, he had concerns with the sale of small bottles, which can be a magnet for onsite consumption regardless of the posted signs. He indicated he will propose an amendment to the conditions, but if not seconded, he will be in support of approval.

Hensley pointed out that Public Safety must be notified and obtain their input if considering the sale of smaller bottles since it was not part of the request. Farra indicated proposing a limit on small bottle sizes, by not allowing the 375 mL to be sold, and requiring the minimum to be 750 mL. There was continued discussion amongst the commissioners on the bottle size and sales at the different stores.

Heany commented on the appropriate request for the Grocery Outlet that has been a great addition to the City to have the same rights to sale liquor as the other retailers.

Farra made clarification regarding the 99 Cents store denial of alcohol business license request and reason of approval for the Grocery Outlet.

Golding addressed the Commission to clarify the comparison of two zoning designations in the Specific Plan, the different/type of alcohol license that Grocery Outlet and 99 Cents had applied for and been granted.

Farra commented that it is important to make those distinctions, as he foresees 99 Cents store may submit a CUP application to sell alcohol.

Chairperson Watson-Gardner called for a motion to approve Use Classification 2020-01. Heany moved to approved and seconded by Vasquez. Motion was approved 4-0-0-1. (Vote: Yes: Watson-Gardner; Vasquez, Heany, Farra; No: None; Abstain: None; Absent: Wolff).

Chairperson Watson-Gardner called for a motion to approve Conditional Use Permit 2019- 02. Farra moved to approved and seconded by Vasquez. The motion was approved 4-0-0-1. (Vote: Yes: Watson-Gardner; Vasquez, Heany, Farra; No: None; Abstain: None; Absent: Wolff).

6. ITEMS FROM DIRECTOR:

Hensley provided development updates on the following projects: Richman mixed-use project; New Hope Village at City of Hope, Woodward building demolished, Old Frontier construction, the new Verizon tower/parking lot at Royal Oaks Park East.

7. ITEMS FROM COMMISSIONERS:

Farra inquired when City Hall will be open without appointments. Hensley responded that after internal discussion and research the answer is unknown as other cities have not yet discussed when they will be open.

8. ADJOURNMENT:

Chair Watson-Gardner adjourned the meeting at 7:46 p.m. to Monday, June 15, 2020.

Craig Hensley, Secretary



PLANNING COMMISSION STAFF REPORT

Date: June 15, 2020

Subject: Vehicle Miles Traveled (VMT) Policy – Setting of Thresholds of Significance

From: Craig Hensley, Community Development Director

Applicant: City Initiated
Joint Project with San Gabriel Valley Council of Governments

BACKGROUND

Changes in state law require the City to adopt new CEQA thresholds of significance for transportation impacts. For the purposes of CEQA these changes will modify how the City evaluates projects for transportation impacts. Specifically, the City is required to use Vehicle Miles Travelled (VMT) instead of Level of Service (LOS) as the metric to evaluate transportation impacts in CEQA documents such as Environmental Impact Reports. Outside of the CEQA process the City can choose to continue to evaluate projects using the LOS metric. Based on guidance provided through an implementation process led by the San Gabriel Council of Governments, City staff have prepared new CEQA transportation impact thresholds for consideration by the Planning Commission and City Council. This report summarizes the State mandate that requires modifying the CEQA thresholds, discusses the City staff recommendations, and includes a draft Resolution to adopt the new CEQA transportation thresholds.

On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process intended to fundamentally change how transportation impact analysis is conducted as part of the CEQA review of projects. SB 743 eliminates LOS as the basis for determining transportation impacts under CEQA and requires the use of VMT instead. The state is shifting the focus of CEQA traffic analysis from measuring a project's impact on automobile delay (LOS) to measuring the amount and distance of automobile travel that is attributable to a project (VMT). The State's goal in changing the metric used to determine a significant transportation impact is to encourage land use and transportation decisions that reduce greenhouse gas emissions, encourage infill development, and improve public health through active transportation.

ANALYSIS

CEQA requires jurisdictions to review the impact a project would have on the existing environment and to disclose those impacts to the public and decision makers and as a result reduce those impacts. CEQA establishes four categories of environmental impacts:

1. No impact
2. Less than significant impact
3. Less than significant impact with the adoption of mitigation measures (a way of reducing an impact's effect)
4. Significant unavoidable impacts

A threshold of significance is the point at which an impact moves from less than significant to significant. CEQA defines a significant impact as “a substantial, or potentially substantial, adverse change in the environment.” To determine what that means for the 18 areas studied in a CEQA document an agency adopts defined thresholds of significance. In relation to traffic, the City for many years has used level of service to determine if a project would create a significant impact.

Traffic Analysis & Level of Service

The focus of most traffic analysis is on a project's impact on nearby intersections and roadway segments. This analysis compares how the existing intersection or roadway segment functions in comparison to how it will function when the project is complete. At the heart of this analysis, is how an intersection or street segment should function. To analyze this, engineers look at the intersections' and roadway segments' level of service (LOS). LOS, in its simplest form, is a ratio of an intersection's or roadway segment's volume to its capacity. If the volume of traffic exceeds the intersection's capacity, one would expect to find traffic delays. If the capacity exceeds volume, one expects to find an absence of congestion. LOS does not take into consideration traffic signal timing, so while an intersection's volume to capacity ratio could demonstrate significant capacity the timing of the intersection could result in congestion.

Existing Thresholds of Significance

The City's existing thresholds of significance rely on LOS and are adjusted to the unique character of the City and the street's context within the network. The existing thresholds develop a more sensitive approach to traffic planning so that streets with different purposes, functions, and in different neighborhoods have different thresholds. Staff still believes that this approach is valid. While it cannot be used for CEQA anymore, the City can continue to use these thresholds outside



of CEQA. Therefore, staff is recommending that these thresholds be adopted as an official policy by the City Council.

The Movement Toward VMT

The move away from LOS and toward VMT is related to a movement that started in Portland, Oregon in 1971 and slowly was recognized by the U.S. Department of Transportation in 2010. This movement, called Complete Streets, was championed by a coalition of organizations including the Association of American Retired Persons, professional organizations overseeing the design of streets (including the American Planning Association, the American Society of Landscape Architects, and Institute of Transportation Engineers), and the National Association of Realtors. A complete street is a street planned, operated, and maintained to enable safe, convenient, comfortable travel for users of all ages and abilities regardless of whether the user is using a wheelchair, walking, bicycling, driving, or riding on public transit. On December 6, 2016, the City Council adopted a complete streets policy (see Attachment D).

In September of 2013, the California State Legislature adopted Senate Bill (SB) 743. This law set the State down a course of measuring a project's environmental impact not by its creation of congestion, but by whether and how much it increases total vehicle miles traveled. Vehicles miles traveled (VMT) is the number of miles all vehicles travel, and it is the State's goal to reduce VMT and thereby reduce air pollution and greenhouse gas emissions.

The legislation was spurred by occasions where the CEQA analysis concluded that a project would have a negative effect on the environment even though the purpose of the project was to improve the environment. In a notable case, the City of San Francisco wanted to replace a traffic lane with a bicycle lane. This project would be expected to have a positive effect on the environment because it would reduce pollution and greenhouse gas emissions. However, because the change would result in additional automobile congestion, opponents to the bicycle lane argued that there would be a significant environmental effect.

While SB 743 changes the focus of traffic analysis to reducing VMT, it also does not prohibit cities from setting LOS standards in its General Plan for infrastructure planning purposes. SB 743 reorients CEQA away from traffic congestion and toward the negative environmental effects of automobile trips (air pollution and greenhouse gas emissions) thus refocusing CEQA on the environment.

CEQA Transportation Thresholds

VMT Discussion Points



While State law now requires cities to adopt VMT thresholds there are still some points on which the City has some discretion. The bullets below highlight these points and provide staff's recommendation.

- *Screening Out Projects* – The State allows cities to filter or “screen out” local serving projects so that they do not even require a traffic study to look at VMT impacts. The idea behind this is that since they will serve the local population, they are likely reducing the need for people to drive further away and thus are reducing VMT. City staff is recommending adopting a list of local service projects that is consistent with the State’s Office of Planning and Research’s (OPR) guidance. This list includes new retail buildings up to 50,000 square feet in floor area, parks, public K-12 schools, day care centers, churches and such. The list also includes projects generating less than 110 daily trips; this includes 11 single-family units, 16 multi-family units, 10,000 square feet of office space, and 15,000 square feet of industrial space.
- *Screening Out Projects in Low VMT Areas* – The State allows cities to filter out regions of the City that are already considered “low VMT” traffic analysis zones (TAZs). The rationale here is that the area likely already has a good mix of uses and adding additional uses in this area provides for less trips and bundling of trips. Staff is recommending to be consistent with OPR guidance to screen out residential and office projects located in low VMT areas. Low VMT is defined as 15 percent below the Baseline VMT metrics.
- *Screening Out Projects in Transit Priority Areas (TPA)* - The City staff recommendation is to be consistent with OPR guidance to screen out projects in Transit Priority Areas defined an area within ½-mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon year. Per Section 21099 of the Public Resource Code, a major transit stop is defined as a site containing an existing rail transit station or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods
- *Screening Out Affordable Housing* – The City staff recommendation is to be consistent with OPR guidance to screen out affordable housing developments or affordable housing units within mixed-use developments pursuant to Sections 15183.3 and 15332 of Title 14 of the California Code of Regulations.
- *Setting a Baseline VMT* - The Baseline VMT is defined as the average VMT for the area represented by Northwest Subarea of the San Gabriel Valley Council of Governments as measured by VMT per capita, VMT per employee, or VMT per service population. A project’s VMT will be compared to the baseline VMT when determining potential



significant impacts. The City can choose different baselines including the City's existing VMT, a subarea of the SGVCOG, the SGVCOG or the SCAG region. Staff recommends choosing the Northwest Subarea of the San Gabriel Valley Council of Governments as the baseline.

- *When a VMT Impact Becomes Significant (Land Use Plans)* – The City staff recommendation is to be consistent with OPR guidance, significant impacts will occur if the VMT per service population for the land use plan exceeds 15 percent below the baseline VMT.
- *When a VMT Impact Becomes Significant (Projects)* – Significant impacts will occur if a project generates VMT (per capita, per employee, or per service population) higher than 15 percent below the baseline VMT.
- *When a VMT Impact Becomes Significant (Transportation Projects)* – Significant impacts will occur if the projects result in a net increase in VMT.

The adoption of new local CEQA thresholds of significance for transportation impacts and the adoption of new Local Transportation Assessment Guidelines will not have a significant environmental impact and are exempt from the CEQA pursuant to Section 15308 of Title 14 of the California Code of Regulations because the two actions are undertaken by the City for the protection of the environment. The revised CEQA thresholds will be compliant with a State mandate (SB 743) and will be used in a regulatory process (CEQA process) that involves procedures for the protection of the environment.

RECOMMENDATION

Adopt the attached resolution recommending that the City Council adopt the proposed thresholds of significance.

ATTACHMENTS

Screening Criteria
PC Resolution 2020-05



Project Type Screening

OPR identified local serving project types that may be presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail projects (less than 50,000 square feet) generally improve the convenience of shopping close to home and has the effect of reducing vehicle travel; therefore, these projects may be screened out if a community opts to adopt this screening criteria. A community may select a threshold that is less than 50,000 square feet, but it may not adopt a size higher than 50,000 square feet as a screening criteria.

In addition to local serving retail, the following uses can also be presumed to have a less than significant impact (absent substantial evidence to the contrary) as their uses are local serving in nature:

- Local-serving K-12 schools
- Local parks
- Day care centers
- Local-serving retail uses less than 50,000 square feet, including:
 - Gas stations
 - Banks
 - Restaurants
 - Shopping Center
- Local-serving hotels (e.g. non-destination hotels)
- Student housing projects on or adjacent to a college campus
- Local-serving assembly uses (places of worship, community organizations)
- Community institutions (public libraries, fire stations, local government)
- Affordable, supportive, or transitional housing
- Assisted living facilities
- Senior housing (as defined by HUD)
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- Projects generating less than 110 daily vehicle trips¹
 - This generally corresponds to the following “typical” development potentials:
 - 11 single family housing units
 - 16 multi-family, condominiums, or townhouse housing units
 - 10,000 sq. ft. of office
 - 15,000 sq. ft. of light industrial²

¹ This threshold ties directly to the OPR technical advisory and notes that CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

² Threshold may be higher depending on the tenant and the use of the site. This number was estimated using rates from ITE's Trip Generation Manual (10th Edition).

- 63,000 sq. ft. of warehousing²
- 79,000 sq. ft. of high-cube transload and short-term storage warehouse²
- Alternatively, a VMT threshold could be developed based on a 'dwelling unit equivalent' measure similar to impact fee programs. OPR estimated that non-residential uses could generate 110 daily trips based on a maximum project exemption size of 10,000 sq. ft. Using the California Household Travel Survey (CHTS) trip lengths produces a VMT equivalent for 10,000 sq. ft. for CA of 836 VMT. The California average household generates approximately 41.6 VMT per day, which equates to about 20 residential units using a 'dwelling unit equivalent.'

2. Transit Priority Area (TPA) Screening

Projects located within a TPA³ may be presumed to have a less than significant impact absent substantial evidence to the contrary. Appendix A identifies the TAP's located within the SGVCOG. This presumption may **not** be appropriate if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75;
2. Includes more parking for use by residents, customers, or employees of the project than required by the City (if the City requires the project to supply parking);
3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

3. Low VMT Area Screening

Residential and office projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area.

For this screening, the regional Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan model was used to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs). TAZs are geographic polygons similar to Census block groups used to represent areas of homogenous travel behavior. Total daily VMT per service population (population plus employment) was estimated for each TAZ. Those TAZs that perform at or below the jurisdictional (City, SGVCOG Subarea, SGVCOG, County, or SCAG) average of total VMT per service population under base year (2012) conditions are considered low VMT areas for purposes of this memo. Individual lead agencies may choose a different baseline threshold to define their low VMT areas, but this screening criteria should be consistent with their impact thresholds. This presumption

³ A TPA is defined as a half-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor per the definitions below.

Pub. Resources Code, § 21064.3 - 'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

Pub. Resources Code, § 21155 - For purposes of this section, a 'high-quality transit corridor' means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

may not be appropriate if the project land uses would alter the existing built environment in such a way as to increase the rate or length of vehicle trips. Selection of the final VMT baseline and thresholds will be reflected in screening maps and the screening tool.

RESOLUTION NO. PC 2020-05

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF DUARTE RECOMMENDING TO THE CITY COUNCIL THE ADOPTION OF “VEHICLE MILES TRAVELED” THRESHOLDS OF SIGNIFICANCE FOR PURPOSES OF ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

WHEREAS, the California Environmental Quality Act Guidelines (“CEQA Guidelines”) encourage public agencies to develop and publish generally applicable “thresholds of significance” to be used in determining the significance of a project’s environmental effects; and

WHEREAS, CEQA Guidelines section 15064.7(a) defines a threshold of significance as “an identifiable quantitative, qualitative or performance level of a particular environmental effect, noncompliance 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”; and

WHEREAS, CEQA Guidelines section 15064.7(b) requires that thresholds of significance must be adopted by ordinance, resolution, rule, or regulations, developed through a public review process, and be supported by substantial evidence; and

WHEREAS, pursuant to CEQA Guidelines section 15064.7(c), when adopting thresholds of significance, a public agency may consider thresholds of significance adopted or recommended by other public agencies provided that the decision of the agency is supported by substantial evidence; and

WHEREAS, Senate Bill 743, enacted in 2013 and codified in Public Resources Code section 21099, required changes to the CEQA Guidelines regarding the criteria for determining the significance of transportation impacts of projects; and

WHEREAS, in 2018, the Governor’s Office of Planning and Research (“OPR”) proposed, and the California Natural Resources Agency certified and adopted, new CEQA Guidelines section 15064.3 that identifies vehicle miles traveled (“VMT”) – meaning the amount and distance of automobile travel attributable to a project – as the most appropriate metric to evaluate a project’s transportation impacts; and

WHEREAS, as a result, automobile delay, as measured by “level of service” and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA; and

WHEREAS, the City’s project review process will retain “level of service” analysis to ensure consistency with the General Plan; and

WHEREAS, CEQA Guidelines section 15064.3 goes into effect on July 1, 2020, though public agencies may elect to be governed by this section immediately; and

NOW, THEREFORE, BE IT RESOLVED by the Planning Commission of the City of Duarte RECOMMENDS as follows:

Section 1. The City of Duarte hereby adopts the VMT thresholds of significance attached as Exhibit A.

APPROVED, AND ADOPTED by the Planning Commission of the City of Duarte at a regular meeting held on the 15th day of June, 2020

Paula Watson-Gardner, Chairperson
City of Duarte Planning Commission

ATTEST:

Craig Hensley, Community Development Director

CITY OF DUARTE
COUNTY OF LOS ANGELES } ss.
STATE OF CALIFORNIA

I, Craig Hensley, Secretary of the Planning Commission of the City of Duarte, do hereby certify that the foregoing Resolution was adopted at a regular meeting of the Planning Commission of the City of Duarte held on June 15, 2020, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

Craig Hensley, Community Development Director

City of Duarte VMT Baselines and Thresholds of Significance

Consistent with State CEQA guidelines section 15064.3, the City of Duarte has adopted the project baselines and thresholds of significance set forth in Table 1 to guide in determining when a project will have a significant transportation impact.

Table 1

Project Type	Thresholds
Land Use Plan	1) Project Impact: A significant impact would occur if the VMT rate for the plan would exceed 15% below the applicable baseline VMT rate. 2) Cumulative Project Effect: A significant impact would occur if the project increases total regional VMT compared to cumulative no project conditions.
Land Use Project	1) Project Impact: A significant impact would occur if the VMT rate for the project would exceed 15% below the applicable baseline VMT rate. 2) Cumulative Project Effect: A significant impact would occur if the project increases total regional VMT compared to cumulative no project conditions.
Retail Project (over 50,000 square feet)	1) Project Impact: A significant impact would occur if the VMT rate for the project would exceed 15% below the applicable baseline VMT. 2) Cumulative Project Effect: A significant impact would occur if the project increases total VMT in the study area compared to baseline conditions.
Transportation Project	A significant impact would occur if the project causes a net increase in total regional VMT compared to baseline conditions, opening year no project conditions, or cumulative no project conditions.
All land use and transportation projects	A significant impact would occur if the project is inconsistent with the RTP/SCS.

Note: Baseline VMT rate is defined as the Northwest Subarea of the San Gabriel Valley Council of Governments per applicable service population.