

Ventura County Vehicle Miles Traveled (VMT) Adaptive CEQA Mitigation Program Framework

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Purpose

The most recent CEQA Guidelines (2018) updated the metric for transportation impact analysis from level of service (LOS) to vehicle miles traveled (VMT) to implement Senate Bill (SB) 743, which was adopted in 2013. The most effective mitigations for reducing VMT are bicycle, pedestrian, and transit network improvements, providing a mix of land use types, and providing affordable housing options near places of work. This program will focus on providing a **VMT Adaptive CEQA Mitigation Program** that includes a simplified mitigation fee program to reduce residual significant VMT impacts for discretionary projects with a focus on housing development.

VMT impacts can be difficult for projects to mitigate on their own without offsite improvements. This voluntary program will provide a tool for CEQA lead agencies to apply VMT mitigations to projects that are subject to CEQA review by utilizing mitigation measures to reduce VMT impacts to below a level of significance. The VMT threshold of significance is determined by each CEQA lead agency, not by this program. As this program provides a template for CEQA VMT mitigation, it may be considered for use with any project that generates VMT impacts above a lead agency's established VMT threshold.

Program Framework

The Program is a multifaceted effort to provide mechanisms for clear and consistent application of VMT reduction strategies to streamline the CEQA process in Ventura County. It is intended to develop capacity and standards that provide several options for avoiding or mitigating potential CEQA significant impacts due to project VMT. This will be accomplished through:

Information for VMT in Ventura County

1. Identification of “**low VMT areas**” where development is less like to have an impact based on VMT per capita
2. Publication of **VMT reduction strategy effectiveness** tailored to Ventura County conditions
 - a. These will provide options for Lead Agencies and Project Proponents to reduce the expected daily VMT to avoid or mitigate potential CEQA significant impacts.

Support for Estimation of Potential Significant CEQA VMT Impacts and Mitigation

3. **Standards for VMT analysis** for consistency
 - a. **Provide standards for VMT analysis** to assist in the review of project's CEQA impact determination by the Lead Agency and reviewing agencies
 - b. Methodology to use items #1 and #2 to provide a **sketch estimation of project VMT** for Project Proponents and Lead Agencies to develop VMT reducing project elements to avoid CEQA impacts, and provide an estimation process for Lead Agencies to compare against the more detailed project-level CEQA VMT analysis of a proposed project.

4. If a significant VMT impact is identified and mitigation is required, **provide potential VMT Reduction Strategies** (same as #1, except instead of a project element it would be mitigation)
 - a. Onsite Mitigation
 - b. Offsite Mitigation
 - i. Fully fund an offsite VMT reduction action
 - ii. **Fair share cost estimate** of VMT reduction: a mitigation \$ per daily VMT reduced to be used for:
 1. Specific project identified by Lead Agency
 2. Mitigation program of a Lead Agency for future to-be-identified projects
 3. Participation in a “regional” project by committing funds to a project by a different lead agency or VCTC
 - a. VCTC would need to create a **VMT reduction account** which could be used to match state and federal grants
5. Information will be Communicated through the **VCTC website**
 - a. Ventura County Transportation Model Information (currently in place)
 - i. Documentation
 - ii. Process for Obtaining Data
 - iii. Modeled VMT and Low VMT areas (#1 on previous page)
 - iv. Daily Origin-Destination Map
 - v. Volume Over Capacity Map
 - b. VMT reduction strategy effectiveness (#2 on previous page)
 - c. VMT analysis methodology recommendation (#3 on previous page)
 - i. How to estimate VMT
 - ii. How to apply VMT reduction strategies
 - iii. Contacts for CEQA lead agencies
 - d. Background Information and Substantial Evidence
 - i. Program Requirements (Based on CEQA Guidelines, AB 1600)
 1. Additionality
 2. Nexus
 3. Mitigation Monitoring

Frequently Asked Questions

1. Is this a mandatory fee program?

No, rather than a prescriptive or mandatory program, the voluntary program establishes guidelines and a structure to allow for funding participation in effective VMT reduction strategies to avoid and mitigate potential CEQA VMT impacts. It is a toolbox for the CEQA lead agencies of Ventura County to streamline the CEQA process for housing projects and other types of projects. While a single countywide mitigation bank was explored (akin to a wetlands bank or the Ventura County Air Pollution Control District’s Off-Site Transportation Demand Management program), several logistical and legal issues would need to be overcome to enact a “simple” singular fee per VMT to pay for VMT-reducing projects through a countywide program.

2. How is VCTC regional and VMT program methodology going to integrate with the VMT methodology implemented (or planned to be implemented) in various Ventura County cities?

The program is intended to compliment CEQA lead agencies processes (cities, Ventura County, special districts) and not to supersede any authority or methodology of an individual agency. The CEQA lead agencies have the statutory authority to analyze and make determinations on potential significant impacts, identification of mitigation measures, and mitigation monitoring.

3. What is the anticipated timing for the VMT mitigation program?

The program is intended to be released in Summer 2022, and the consultant team will be available to work with lead agencies through February 2023.

4. Will there be a list of VMT mitigation projects for review and evaluation by lead agencies?

No, the program will identify the types of project components and features that can reduce VMT (and their expected effectiveness in doing so) and a fair share cost estimate. The lead agency has the statutory authority and discretion to direct mitigation funds and to monitor the mitigation implementation. A lead agency could choose to participate in a regional or multijurisdictional project by directing VMT mitigation fees to another lead agency or VCTC. This could be an opportunity to leverage local funds as match for state or federal grants.

5. Is the program only focused on residential land uses?

This program is focused on CEQA streamlining of housing development, so the analysis and substantial evidence is based on housing development. However, in our project development team meetings with lead agencies, it was requested the VMT reduction strategies include those for all types of land uses, and the methodologies and tools can be used for all types of land uses and programs and plans. The VCTM includes information on residential and employment land uses.

6. What is the relevance, timing, and nexus associated with the VMT program and AB 1600 process?

The program is a standardized VMT process with tools for lead agencies and applicants to develop projects that avoid potential significant CEQA VMT impacts if the project is subject to CEQA review. We will be following requirements included in the CEQA Guidelines, AB 1600, and other state policies and court decisions to ensure the program would be consistent with CEQA mitigation practice and will evolve to meet future needs in the County under the direction of VCTC and partner agencies.

7. What sort of environmental document is envisioned by VCTC for the regional VMT Adaptive Management Program?

Since this program is a fee program, it is not anticipated that the program itself requires a CEQA review. The VMT reduction strategies themselves are by-and-large exempt from CEQA review (bicycle lanes, sidewalks, signage, lighting, transit facilities, etc.). However, the program will define those activities that are specifically categorically exempt from CEQA as part of the substantial evidence to further streamline project elements or mitigation measures. Since the intent of the program is to streamline CEQA for housing projects, VMT reduction strategies as project elements or mitigation measures would best be actions exempt from CEQA review.

8. How will the VMT adaptive mitigation program integrate with the County of Ventura's Traffic Impact Mitigation Fee (TIMF)?

An update is currently underway to the County's TIMF program, which is intended to ensure adequate transportation infrastructure is funded and in place to support future development. The program is a mix of improvements that support vehicle travel and improvements that support non-motorized transportation and transit. The new CEQA guidelines may require additional VMT reducing projects to offset potential VMT increases from roadway projects. This effort is not directly related to the TIMF, however it may inform the types of improvements necessary to ensure the TIMF program has a less than significant CEQA transportation impact.