



Transportation Analysis under CEQA Second Edition*

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Evaluating Transportation Impacts of State Highway System Projects

California Department of Transportation
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*** Important updates to the Second Edition will be posted to the "Internal Bulletins" and "Hot Topics" section of the Caltrans SB 743 website at <https://dot.ca.gov/programs/esta/sb-743/resources>.**

ACKNOWLEDGEMENTS

The *Transportation Analysis Framework (TAF)* and *Transportation Analysis Under CEQA (TAC)* were originally prepared by the California Department of Transportation (Caltrans) working with state administration partners and stakeholders from the public, private and non-profit sectors. Second edition contributors include staff and management from the Headquarters Divisions of Environmental Analysis, Transportation Planning, Traffic Operations, and Legal, as well as from the Director's Office of Sustainability. The Headquarters team benefitted from input provided by the Caltrans Executive Team, staff and management from Caltrans districts, stakeholders involved in the SB 743 Implementation Working Group, and interested members of the general public. The second editions of the TAF and TAC include updates and clarifications to elements of the original guidance, but the analysis framework detailed in the first editions remains largely the same.

The first edition documents were the products of a collaboration among state government partners. Throughout the development of the first editions, the Caltrans team worked closely with technical and policy experts from the Governor's Office of Policy and Research (OPR) and the California Air Resources Board (CARB).

We are grateful for the time and effort that contributors generously gave to develop and document Caltrans' approach to analyzing and evaluating transportation impacts of projects on the State Highway System (SHS).

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FOREWORD

The second editions of the TAF and TAC are intended to guide California Environmental Quality Act (CEQA) transportation impact analysis for projects on the SHS. They include clarifications and updates to the guidance published over the last four years in bulletins and Hot Topics on the [SB 743 Implementation Resources](#) webpage hosted by the Director's Office of Sustainability. Caltrans prepared these documents to guide implementation of Senate Bill (SB) 743 (Steinberg, 2013). The TAF and TAC establish Caltrans guidance on how to analyze induced travel associated with transportation projects and how to determine impact significance under CEQA, respectively. These documents guide transportation impact analysis for projects on the SHS only. The non-capacity-increasing maintenance projects like re-paving and filling potholes are unaffected, as are many safety improvements including traffic calming measures to slow traffic, and transportation projects that create facilities for pedestrians and cyclists and transit projects.

The first editions of the TAF and TAC were released in September 2020 and underwent extensive discussions and reviews. For the first editions, Caltrans hosted a total of 130 meetings with stakeholders and provided a 60-day informal feedback period on the draft documents. Statewide outreach events included two external webinars attended by over 850 participants and three external technical roundtables attended by more than 150 participants. These Caltrans events were supplemented by OPR's webinar and "Office Hours" outreach which reached over 3,500 participants. Additionally, Caltrans met regularly through the guidance development process with key stakeholders including the Self-help Counties Coalition, the Climate Plan coalition, and the Rural Counties Task Force. Caltrans received feedback on the drafts from 37 agencies including counties, cities, and MPOs as well as from consultants, advocates, coalitions, and other state agencies. Throughout the process, a small number of controversial issues stood out. To address the difference of opinions around key technical issues, Caltrans convened an expert panel of academics and practitioners through the University of California, Berkeley Tech Transfer. The panel chair presented the group's conclusions to stakeholders at a virtual Technical Roundtable prior to finalizing the group's recommendations. Caltrans and state partners accepted the panel's recommendations, which are reflected in the guidance documents. The Caltrans TAF and TAC guidance documents reflect a cultural shift for how Caltrans interprets, analyzes, and mitigates transportation impacts. This shift impacts the entire project delivery process and shapes the future of California's transportation system. These documents reflect the best available analytical tools and guidance.

This September 2024 iteration of the TAF and TAC serves as the second edition of the guidance. Members of the SB 743 Implementation Working Group, composed of stakeholders from the public, private, and non-governmental sectors, provided input and recommendations to inform efforts. In addition, the TAF and TAC were distributed through the Caltrans SB 743 email list to provide interested members of the public the opportunity to review the draft guidance documents. While much of

the content remains the same, minor changes have been informed by the Hot Topics and Bulletins that were previously posted to the Caltrans SB 743 website. The purpose of the Hot Topics and Bulletins were to provide important practitioner updates to the first edition of the TAF and TAC as issues arose during project delivery. The updates reflect an evolving understanding of SB 743 implementation since September 2020. All updates have thus been consolidated into this second edition, along with other minor clarifications and edits.

Caltrans continues to engage with partner agencies to explore emerging methodologies and strategies to address VMT. As SB 743 continues to be implemented, we anticipate opportunities to make refinements in future editions and/or through interim guidance updates via the Hot Topics and Bulletins on the Caltrans SB 743 website at <https://dot.ca.gov/programs/esta/sb-743/resources>.

1 INTRODUCTION/BACKGROUND

The intent of this guidance is to provide information to support Caltrans' CEQA practitioners in making CEQA significance determinations for transportation impacts of projects on the SHS.

With the passage of SB 743 (Steinberg, 2013) codified in Public Resources Code (PRC) section 21099, California embarked on a new approach for analyzing transportation impacts under CEQA. These changes require updates to both the Caltrans Local Development-Intergovernmental Review (LD-IGR) function and project delivery for projects on the SHS.

In SB 743, the California State Legislature (Legislature) found and declared the following:

- (1) With the adoption of Chapter 728 of the Statutes of 2008, popularly known as the Sustainable Communities and Climate Protection Act of 2008, the Legislature signaled its commitment to encouraging land use and transportation planning decisions and investments that reduce vehicle miles traveled and contribute to the reductions in greenhouse gas emissions required in the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code). Similarly, the California Complete Streets Act of 2008 (Chapter 657 of the Statutes of 2008) requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel.*
- (2) Transportation analyses under the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) typically study changes in automobile delay. New methodologies under the California Environmental Quality Act are needed for evaluating transportation impacts that are better able to promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations.*

The legislative intent of SB 743 is to do both of the following:

- 1) Ensure that the environmental impacts of traffic, such as noise, air pollution, and safety concerns, continue to be properly addressed and mitigated through CEQA.
- 2) More appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.

In December 2018, the Office of Administrative Law approved updates to the CEQA Guidelines prepared by OPR. The CEQA Guidelines are administrative regulations that govern the implementation of CEQA. The update contained, among other things, a new section 15064.3 addressing transportation impacts. OPR also released the [Technical Advisory on Evaluating Transportation Impacts in CEQA](#) (“OPR Technical Advisory”) which contains recommendations on assessing vehicle miles traveled (VMT), significance, and mitigation measures.¹

Section 15064.3 of the Guidelines separately addresses the analysis of transportation impacts arising from land use projects and those arising from transportation projects. For Caltrans, SB 743 means major changes in two activities:

- 1) Review of a proposed land use project's or a proposed plan's potential impact to the SHS, which are generally addressed through the Caltrans LD-IGR Program.
- 2) CEQA analysis of capacity-increasing transportation projects on the SHS.

These changes are consistent with both the CEQA Guidelines and OPR's Technical Advisory. Together, they aim to reduce automobile use while increasing use of more sustainable modes of transportation that are essential to supporting our growing population and economy, while also meeting climate goals. Caltrans is committed to providing a safe and reliable transportation network that serves all people and respects the environment. Reducing VMT corresponds with the goals detailed in Caltrans' Strategic Management Plan. It is also consistent with and will aid Caltrans in continuing to meet its policy aims for the Environment (Director's Policy [DP-004]); Freeway System Management (DP-08); Energy Efficiency, Conservation, and Climate Change (DP-023-R1); Climate Change (DP-30); and Sustainability (DP-033), among others.

This guidance establishes Caltrans' process for analyzing a transportation project's impacts under CEQA due to increases in vehicle miles traveled (VMT) attributable to that project and offers an initial list of potential mitigation measures for significant impacts. This guidance augments but does not change any of the basic processes currently in place for evaluating projects under CEQA and other applicable laws or regulations. This guidance is not intended to address transportation impacts resulting from land-use projects which are addressed in the separate *Transportation Impact Study Guide* (TISG). Nor is this guidance intended to provide detailed instruction on performing the induced travel analysis itself, which can instead be found in the TAF.

The TAC is to be used in conjunction with the guidance provided in the TAF. The flow chart provided as Figure 1 illustrates the relationship between the TAC and TAF.

¹ Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018).

TRANSPORTATION ANALYSIS UNDER CEQA (TAC)

TRANSPORTATION ANALYSIS FRAMEWORK (TAF)

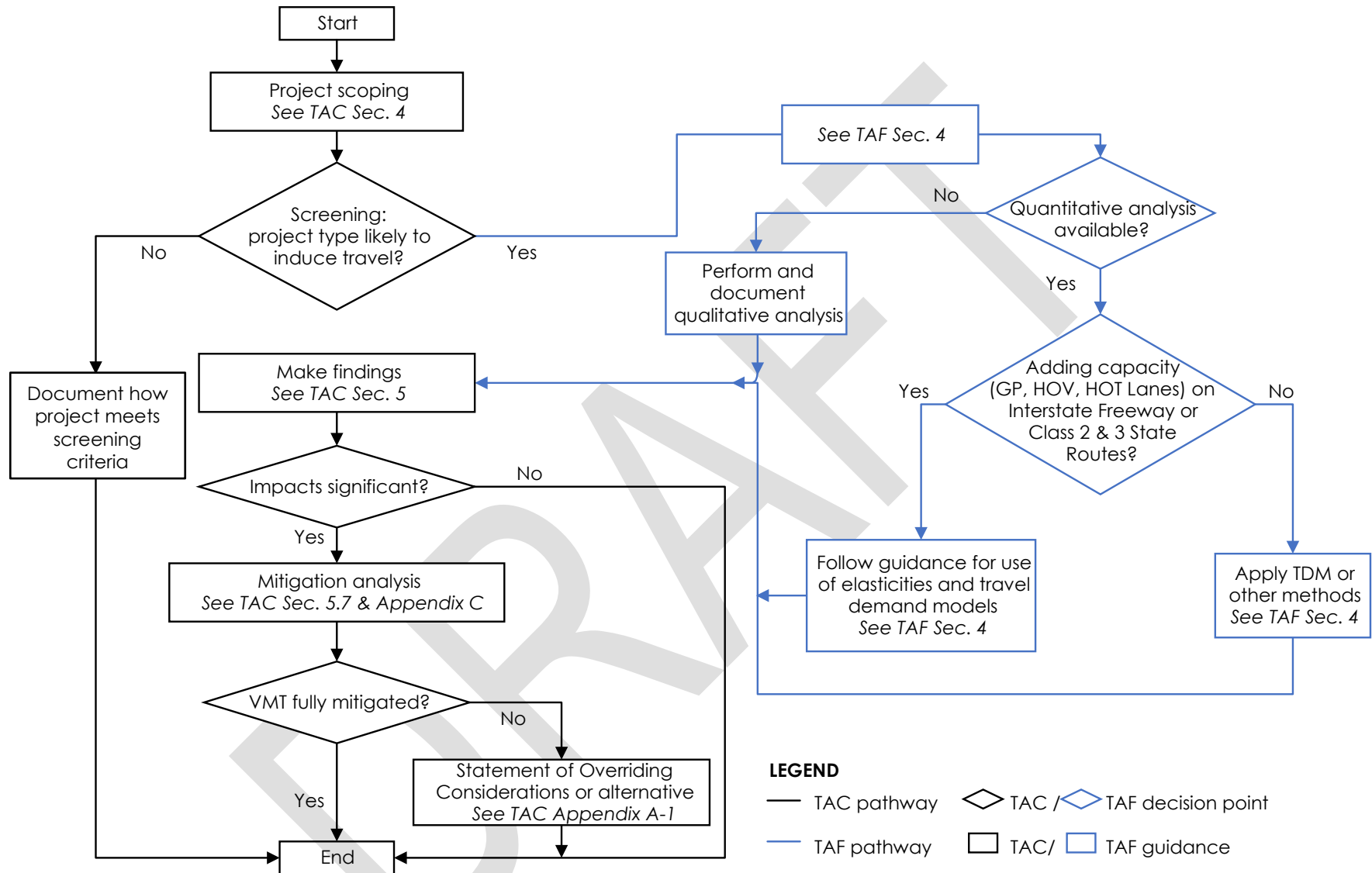


Figure 1. Relationship Between the TAC and TAF Documents

2 REGULATORY SETTING

This section contains a listing of relevant laws, regulations, documents, and references for project-level VMT analysis.

Regional VMT analysis takes place during the development of the Regional Transportation Plans (RTPs), which are prepared and adopted every five years by the 26 rural Regional Transportation Planning Agencies (RTPAs), and every four years for the 18 Metropolitan Planning Organizations (MPOs) located in air quality non-attainment areas and at least every five years for MPOs located in air quality attainment areas. An RTP is a long-range, fiscally constrained plan prepared subject to federal and state requirements. It provides a vision for regional transportation investments over a period of 20 years or more and analyzes the transportation system and its relationships to a region's economy, environment, livability, and more.

2.1 SUSTAINABLE COMMUNITIES AND CLIMATE PROTECTION ACT OF 2008

SB 375 (Steinberg), known as the Sustainable Communities and Climate Protection Act, was enacted in 2008. SB 375 directed CARB to adopt regional GHG emissions reduction targets applicable to each MPO region. SB 375 also required California's 18 MPOs to: 1) prepare a sustainable communities strategy (SCS) to achieve the GHG-reduction target as part of the RTP; or 2) prepare an "alternative planning strategy" if the SCS does not achieve the reductions called for by the regional targets.

SB 375 also required the California Transportation Commission, in conjunction with CARB, to maintain guidelines for the travel demand models used in the development of RTPs.

Each RTPA or MPO must also complete an environmental analysis of its RTP pursuant to CEQA. These environmental documents analyze the anticipated environmental effects arising from the implementation of the region's RTP, including transportation impacts. The environmental documents prepared by the RTPAs and MPOs report a variety of VMT-related metrics or performance measures in their analyses including total annual VMT, per capita VMT, and congested VMT.

2.2 CEQA GUIDELINES

Section 15064.3 of the CEQA Guidelines (Guidelines) addresses *Project-level VMT analysis* under CEQA.

The portion of the Guidelines that address transportation projects (rather than land use projects), begins at section 15064.3(b) and reads:

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

Several broader observations about section 15064.3 and how it relates to this guidance are important to note:

- Per section 15064.3, VMT is “Generally the most appropriate measure of transportation impacts.” The simplest definition of VMT, or vehicle miles traveled, is “One vehicle traveling on a roadway for one mile” (Sacramento Area Council of Governments 2016 MTP/SCS). Section 15064.3(a) defines

“vehicle miles traveled” as “The amount and distance of automobile travel attributable to a project.” This is a significant change from previous methodologies which typically analyzed Level of Service (LOS)², a travel time and congestion metric, as the most important consideration in transportation impacts analysis. When evaluating transportation impacts on the SHS, Caltrans will now evaluate the “induced travel,” or the change in VMT attributable to an individual transportation project.

- Certain project types, primarily those which are non-capacity increasing, are presumed to result in a less than significant transportation impact and therefore generally do not require analysis of VMT. Those project types are discussed in section 5.1 of this document and are adapted from the OPR Technical Advisory.
- A lead agency may in some cases tier its transportation impact analysis, as appropriate, from the environmental impact reports (EIRs) prepared for regional transportation plans/sustainable community strategies (RTP/SCS).³ See the discussion in section 5.1.2. of this document to assess whether transportation impacts have been adequately analyzed at the programmatic level and whether tiering from an RTP/SCS EIR or other analysis may be appropriate.
- Quantitative analysis is most appropriate for transportation projects that increase roadway capacity. Please refer to Section 4 of the TAF for further discussion.
- Qualitative analysis may be appropriate for certain transportation projects, particularly when technical models are not available, as discussed in TAF Section 4. The use of a qualitative analysis should generally be limited to those situations in which quantitative tools are unable to adequately assess a transportation project’s impacts. Please refer to Section 4 of the *Transportation Analysis Framework: Induced Travel Analysis (TAF)* for more details.
- Caltrans has chosen to express change in VMT in absolute terms.

² The Highway Capacity Manual, which first introduced the concept of LOS in 1965, defines LOS as follows: “Level of service (LOS) is a quality measure describing operational conditions within a traffic stream, generally in terms of such service measures as speed and travel time, freedom to maneuver, traffic interruptions, and comfort and convenience. Safety is not included in the measures that establish service levels.” Additionally, “each facility type that has a defined method for assessing capacity and level of service also has performance measures that can be calculated. These measures reflect the operating conditions of a facility, given a set of roadway, traffic, and control conditions. Travel speed and density on freeways, delay at signalized intersections, and walking speed for pedestrians are examples of performance measures that characterize flow conditions on a facility” (Highway Capacity Manual, 2000).

³ It should be noted that some RTPs/SCSs are not consistent with the state’s climate goals, according to CARB. See CARB, “CARB 2022 Scoping Plan,” 4. A close review of the applicable EIR for the RTP will be required in order to “tier” from its analysis.

3 OTHER RELEVANT DOCUMENTS AND REFERENCES

3.1 TECHNICAL ADVISORY ON EVALUATING TRANSPORTATION IMPACTS IN CEQA (OPR TECHNICAL ADVISORY)

The OPR Technical Advisory provides recommendations on assessing VMT, significance, and mitigation measures. Caltrans guidance documents adapted recommendations from the Technical Advisory. As such, practitioners should consult the TAC and TAF when evaluating transportation impacts of projects on the SHS.

3.2 CALIFORNIA AIR RESOURCES BOARD CLIMATE CHANGE SCOPING PLAN

In 2006, the Legislature passed Assembly Bill 32 (AB 32, Nunez), known as the California Global Warming Solutions Act of 2006, which created a comprehensive, multi-year program to reduce GHG emissions in California. AB 32 required CARB to develop the Scoping Plan to describe the approach California would take to reduce GHGs to meet the target of reducing emissions to 1990 levels by 2020. The Scoping Plan was first approved by CARB in 2008 and updated in 2014, 2017, and again in 2022.⁴

In 2016, the Legislature passed SB 32 (Pavley), which codified a statewide 2030 GHG emissions-reduction target of 40 percent below 1990 levels. Along with SB 32, the Legislature passed companion legislation, AB 197 (Eduardo Garcia), which provided additional direction for updating the Scoping Plan. These changes were reflected in the third update to the Scoping Plan completed in 2022.

3.3 CALIFORNIA AIR RESOURCES BOARD'S MOBILE SOURCE STRATEGY

In May 2016, CARB released the updated Mobile Source Strategy which demonstrates how California can simultaneously meet air quality standards, achieve GHG emissions reduction targets, decrease health risk, and reduce petroleum consumption from the transportation sector through a modeling scenario—the “Cleaner Technologies and Fuels Scenario” (CTF). Although the majority of GHG reductions in the scenario are assumed to be attributable to new vehicle technologies and low carbon fuels, the CTF also demonstrates the need for a 15

⁴ California Air Resources Board, “2022 Scoping Plan Documents.” Available at <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>.

percent reduction in total light-duty VMT by 2050 as compared to baseline 2050 levels. This scenario would require light-duty VMT growth of only five percent by 2030, compared to the current growth trajectory of approximately 11 percent.⁵ The combined strategies within the CTF scenario, including VMT reduction, would achieve a 45 percent reduction in on-road GHG emissions by 2030, and an approximately fifty percent reduction in on-road petroleum demand by 2050, meeting both climate targets. CARB updated the Mobile Source Strategy in 2020, as required by Senate Bill 44 (Skinner).⁶

3.4 CALIFORNIA AIR RESOURCES BOARD'S SUSTAINABLE COMMUNITIES AND CLIMATE PROTECTION ACT PROGRESS REPORT

In June of 2023, CARB published the "2022 Progress Report: California's Sustainable Communities and Climate Protection Act" (Progress Report). The Progress Report indicates California is not on track to meet the GHG reductions expected under SB 375. According to the Progress Report, actual statewide per capita VMT continues to increase, though the rate of increase has slowed compared to the 2018 Progress Report. The fundamental finding in CARB's Progress Report is that California is not on track to meet GHG emissions reductions expected under SB 375 and will not meet SB 32 GHG emissions targets without significant changes to how communities and transportation systems are planned, funded, and built.⁷

⁵ California Air Resources Board, "Mobile Source Strategy," (May 2016), 37.

⁶ California Air Resources Board, "2020 Mobile Source Strategy." Available at <https://ww2.arb.ca.gov/resources/documents/2020-mobile-source-strategy>.

⁷ California Air Resources Board, "2022 Progress Report: Sustainable Communities and Climate Protection Act". (June 2023), 3, 5.

4 PROJECT SCOPING

Formal scoping will continue to follow established procedures identified under CEQA, including preparation of a Notice of Preparation for an EIR. Scoping a project on the SHS is a collaborative process.

Preliminary environmental scoping occurs even earlier, during the “Project Initiation Phase” and this phase culminates in the “programming” of transportation projects. Transportation programming is the commitment of transportation funds to particular projects, to be available over a period of several years. Separate programming documents, prepared and adopted for somewhat different purposes, are required under both federal and state law.

Deviating from the programmed scope, schedule, or budget is an uncertain process, and represents a potential risk to a project’s successful delivery. Projects that do not have an accurate scope may face cost increases and schedule delays. Because of fiscal and schedule constraints, it may become increasingly difficult to achieve feasible and proportional project-level VMT mitigation as a roadway capacity-increasing project proceeds from initial scoping to final design. Therefore, it is important to thoroughly consider a range of feasible project alternatives and/or mitigation which meet the purpose and need of the project, as well as feasible mitigation which can potentially minimize, or avoid altogether, the additional VMT from capacity-increasing projects.

The following options, and others which may avoid VMT impacts, require close coordination with federal, state, and regional transportation partners, and should be considered as early as possible in the planning process, as part of the range of VMT-reducing alternatives to capacity-increasing projects.

- Invest in multimodal transportation infrastructure: Caltrans and/or partnering agencies could directly invest in infrastructure likely to support VMT reduction in order to mitigate the impacts of capacity-increasing projects.
- Expand toll lane use or develop other pricing-based strategy options: This option would consist of expanding the use of toll lanes or developing other pricing strategies, such as increasing parking prices in an area, to reduce VMT.

Other potential options to reduce project-level VMT impacts are discussed in the mitigation section of this document (section 5.7).

In addition to mitigation, another consideration during the preliminary scoping of a project involves the determination of the appropriate level of environmental document. For new projects, Project Development Teams (PDTs) should consider the likelihood of a potentially significant environmental impact (applying the methods in Section 5) when determining the appropriate level of document. PDTs should also evaluate whether projects initially determined to require a Negative

Declaration/Mitigated Negative Declaration (ND/MND) may instead require an EIR if there is a potential for a significant impact, and, if no feasible alternative or mitigation substantially reduces that impact, a Statement of Overriding Considerations may be appropriate.

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5 THE CEQA ANALYSIS

This guidance document is primarily intended to address the following question on the CEQA checklist found in Guidelines Appendix G, section XVII(b):

Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The portion of section 15064.3(b) of the CEQA Guidelines pertaining to transportation projects provides that for roadway capacity projects “...agencies have the discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements.” Consistent with the language of Section 15064.3 of the CEQA Guidelines, Caltrans concurs that VMT is the most appropriate measure of transportation impacts under CEQA. The determination of significance of a VMT impact will require a supporting induced travel analysis for capacity-increasing transportation projects on the SHS when Caltrans is lead agency or when another entity acts as the lead agency.

Whether a project is in conflict or inconsistent with CEQA Guidelines section 15064.3(b) will be evaluated by practitioners based on its potential to increase VMT attributable to the project, (i.e., induced travel), as discussed in Section 5.6 below. The guidance in this document further explains the types of projects and impacts that would be considered significant within this context.

The remaining CEQA checklist questions generally associated with transportation impacts are listed in Appendix G of the CEQA Guidelines and are addressed in Appendix B of this document. Each question should be analyzed independently. If other potential impacts are identified for a particular project, the standard CEQA analytical process would apply and significance determinations made for each, as appropriate.

5.1 SCREENING

The use of VMT as the CEQA transportation metric will, in many cases, lead to a determination that roadway capacity-increasing projects result in significant transportation impacts. For many other types of transportation projects, however, a VMT impact analysis beyond the screening process is not necessary. Generally, there are two reasons such an analysis may not be warranted. The first is because the type of project would not be likely to lead to a measurable and substantial increase in VMT. The second is because the project’s VMT impacts have already been analyzed and, when necessary, mitigated to the extent feasible in an earlier CEQA document. In the latter case the analysis may “tier” from or otherwise rely on that earlier analysis.

5.1.1 SCREENING BY PROJECT TYPE: NON-CAPACITY-INCREASING VS. CAPACITY-INCREASING PROJECTS

Understanding the purpose and scope of the proposed project will assist the practitioner in determining which project types have the potential for a significant transportation impact. Determination of the project type usually occurs early in the project development process and is supported by the “purpose and need” of the project. A key consideration for the practitioner which is addressed below is determining whether a project type has the potential to induce travel.

If a project increases capacity, it will generally require an analysis to determine if there will be a significant transportation impact caused by the increase in VMT attributable to the project. Many projects Caltrans regularly undertakes such as maintenance projects including culvert repairs, overlays, and restriping, do not increase capacity. During the screening review, practitioners should examine the specific project circumstances to ensure that there are no unusual circumstances that could otherwise lead to an increase in VMT. Then, practitioners should provide a brief discussion in the environmental document that describes why the project is not expected to increase VMT.

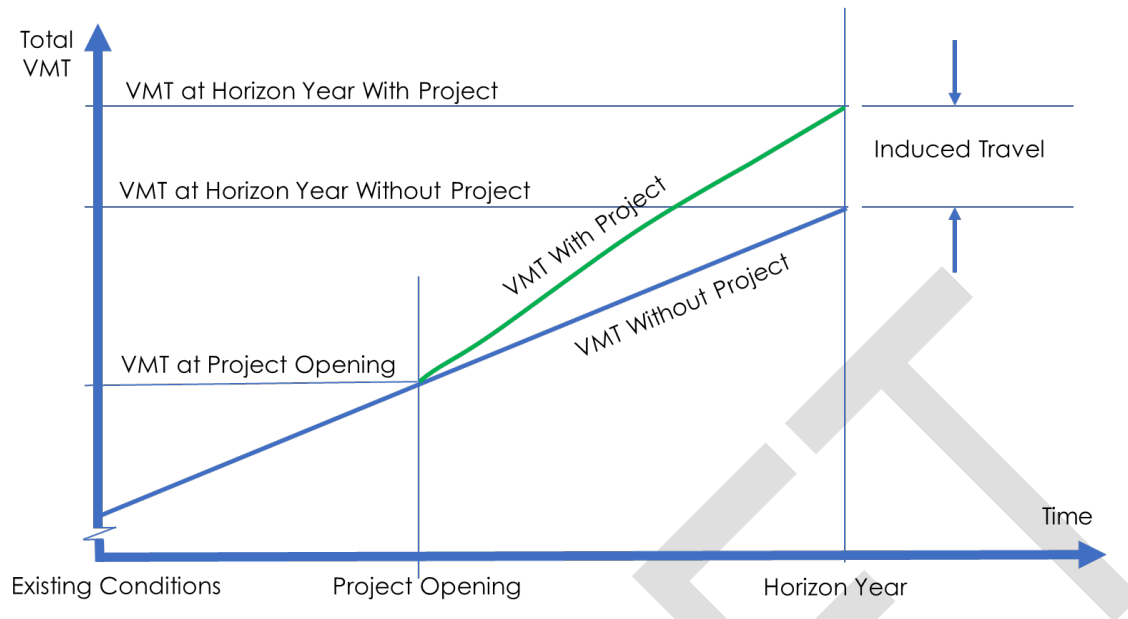
Adapted from OPR's Technical Advisory, the following excerpt describes types of projects likely to lead to measurable and substantial increases in VMT:

i) Project Types Likely to Lead to a Measurable and Substantial Increase in Vehicle Travel⁸

Addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, or lanes through grade-separated interchanges, and other projects adding capacity to the State Highway System.

These are project types that include the construction of new facilities or expansion of existing ones. These are common types of capacity-increasing projects that Caltrans constructs. These projects are likely to lead to a measurable and substantial increase in VMT. Therefore, an induced travel analysis is required to determine how much of the increase in VMT is attributable to the project (versus other variables such as the economy and population growth) and, where impacts are significant, whether mitigation can reduce the impacts to a less than significant impact. Only the VMT that is directly attributable to the project should be analyzed (See TAC Figure 2). The TAF provides guidance for analyzing induced travel.

⁸ Office of Planning and Research, *Technical Advisory on Evaluating Impacts in Transportation* (OPR December 2018), 20.



**Figure 2. Identification of Induced Travel
(VMT Attributable to a Transportation Project)**

The emphasis of this guidance is to identify those projects that will lead to a measurable and substantial increase in vehicle travel. The following describes projects not likely to lead to a measurable and substantial increase in VMT and which therefore generally should not require an induced travel analysis. The second edition list has been adapted from OPR's Technical Advisory. The final six bullets on the list of project types not likely to lead to a measurable and substantial increase, beginning with "HOV bypass lanes on on-ramps" were added based on discussion with OPR. These are expected to be added to OPR's list of project types in a future update of the OPR Technical Advisory. Note the deletion of the category of project described as "Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase," which was also an outcome of discussion between Caltrans and OPR during the course of producing the TAC and TAF.

ii) Project Types Not Likely to Lead to a Measurable and Substantial Increase in Vehicle Travel⁹

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System

⁹ OPR, *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018), 20-21.

- field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity
- Roadside safety devices or hardware installation such as median barriers and guardrails
 - Roadway shoulder enhancements to provide “breakdown space,” dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes
 - Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety, or auxiliary lane extensions that result in a total auxiliary lane length greater than one mile and project level effects are not substantial and measurable.
 - Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, emergency truck pullovers, or emergency breakdown lanes that are not utilized as through lanes
 - Addition of roadway capacity on local (FHWA functional classification (Class) 7) or collector (Class 5 and 6) streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
 - 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 assuming no change in managed lane occupancy (e.g., general purpose (GP) to high occupancy vehicle (HOV), high occupancy toll (HOT), or fully priced lane, HOV to HOT lane, HOV or HOT to fully priced lane, and HOV-2+ to HOV-3+ or higher)
 - Addition of a new lane that is permanently restricted to use only by transit vehicles
 - Reduction in number of through lanes
 - 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
 - Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
 - Timing of signals to optimize vehicle, bicycle, or pedestrian flow
 - Installation of roundabouts or traffic circles
 - Installation or reconfiguration of traffic calming devices
 - Adoption of or increase in tolls

- Initiation of new transit service
- Conversion of streets from one-way to two-way operation with no net increase in number of general purpose or continuous through traffic lanes
- 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 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, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor
- HOV bypass lanes on on-ramps
- Local (Class 7) and collector (Class 5 and 6) roads in rural areas that don't include sidewalks where there would be no pedestrian traffic to use them
- Lanes through grade-separated interchanges without additional receiving lanes downstream
- Adding vehicle storage to a ramp without further reconfiguration
- Park and Ride facilities
- Truck size and weight inspection stations

While the above list is thorough, it is not necessarily comprehensive. There may be types of projects in addition to those listed that would not lead to a measurable and substantial increase in VMT. When concluding that a particular project may be screened out from further analysis, the practitioner should review and fully document the rationale supporting the conclusion that the particular project would not likely lead to a measurable and substantial increase in VMT.

5.1.2 TIERING

As outlined in PRC sections 21068.5, 21093 and 21094, as well as Guidelines sections 15152 and 15385, tiering is a means of reducing redundancy, focusing analysis and ensuring consistency with earlier CEQA analyses. As defined in the PRC, tiering "...refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general

discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.”

Tiering the project-level analysis from the regional analysis completed for the RTP/SCS EIR, or another EIR such as one prepared for a general plan or specific plan, would be the ideal method of determining the significance of transportation impacts. This is particularly true for an EIR prepared for an RTP/SCS, because if the regional modeling performed for a particular suite of projects (those that increase VMT and those that reduce VMT) has already accounted to some extent for the individual project’s contributions, then the effects of the proposed project ideally would have already been mitigated entirely or in part. Although current RTP/SCS EIRs have limited utility for tiering transportation impact analysis, over time, tiering may become more available. Considerations to ensure that transportation impacts have been adequately evaluated and mitigated at the programmatic level include:

- The EIR must adequately evaluate the phenomenon of induced travel. The modeling performed for the suite of transportation projects and initiatives in a region must accurately capture the induced VMT from land use effects of those projects.
- If tiering from an RTP/SCS EIR, the EIR must demonstrate consistency with the state’s GHG reduction targets because meeting the current SB 375 targets alone is not enough to demonstrate broad consistency between the RTP/SCS’s VMT analysis and state climate goals. A transportation project which substantially increases VMT may conflict with state climate goals, even if the project was included in an RTP/SCS that meets the applicable GHG reduction targets called for by SB 375¹⁰. This is because the current RTPs/SCSs are anticipated to achieve an 18 percent reduction in statewide per capita, on-road light-duty, transportation-related GHG emissions relative to 2005 by 2035, if those RTP/SCSs are fully implemented. However, the state forecasts a 25 percent reduction is needed to meet the state’s climate goals¹¹.
- All feasible mitigation measures normally considered at the project level must be fully considered and properly applied at the plan level.

Note that even when tiering is not available, the CEQA Guidelines allow for the “incorporation by reference” of materials from a broader EIR. For example, the “environmental setting” for a project could be incorporated by reference from a broader EIR, thus streamlining the project-level analysis. Please see Guidelines § 15150 for more information and the requirements for incorporation by reference.

¹⁰ California Air Resources Board, “CARB 2017 Scoping Plan-identified VMT Reductions and Relationship to State Climate Goals,” (January 2019), 4.

¹¹ California Air Resources Board, “CARB 2017 Scoping Plan-identified VMT Reductions and Relationship to State Climate Goals,” (January 2019), 3.

5.2 BASELINE DETERMINATION

CEQA requires the comparison of impacts caused by a project to a “baseline” to determine whether those impacts are significant (Guidelines §15125).

Normally, future conditions with the project are compared to a baseline of “existing conditions.” However, alternatives to an existing conditions baseline may be appropriate in certain circumstances, as included in the recent CEQA Guidelines update that reflects case law on determining the baseline to use in CEQA documents:

Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project’s impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence. In addition, a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record (Guidelines § 15125(a)(1)).

A lead agency may also use projected future conditions (beyond the date of project operations) baseline as the sole baseline for analysis only if it demonstrates with substantial evidence that use of existing conditions would be either misleading or without informative value to decision-makers and the public. Use of projected future conditions as the only baseline must be supported by reliable projections based on substantial evidence in the record (Guidelines §15125(a)(2)).

Transportation projects are typically built years after the CEQA analysis is completed, and comparing to existing conditions would combine the project’s VMT effects with other effects on VMT that occur over time, such as increases in population or economic activity, in effect misleading the public and decision-makers by obscuring the impacts of the project itself. When comparing future build conditions to future no-build conditions, the difference is the addition of the project itself and associated changes that may occur to land use and travel behavior. The environmental document will need to include information on the traffic modeling, including the planning projections included in the model.

Regardless of whether a quantitative or qualitative analysis is performed, in order to fully provide context and information, beyond the future build condition, the CEQA

analysis for VMT must also include the current condition and the future no-build condition. In other words, the future build alternative should be compared to the future no-build conditions (i.e., the conditions expected to exist in the future absent the project) to determine the amount of VMT attributable to the project per the CEQA Guidelines and the OPR Technical Advisory. Additionally, and for informational purposes, the comparison to the existing condition should also be provided. However, a comparison only to existing conditions would not provide an accurate picture of the project's effects. Only by taking into account other variables not caused by the project, such as the projected future regional transportation system, population growth, economic growth and land use changes, can the *VMT that is attributable to the project* be separated from a general increase or decrease in VMT in a region overall. In order to fully apprise the reader of the total change in VMT anticipated, VMT for existing conditions should also be provided.

5.3 DIRECT IMPACTS TO VEHICLE MILES TRAVELED, INCLUDING INDUCED TRAVEL

Any analysis of VMT impacts must 1) determine whether the project will cause a significant transportation impact, and 2) be supported by “substantial evidence” as defined in Guidelines § 15384. The CEQA Guidelines allow a qualitative approach to analyzing transportation impacts when quantitative methods are unavailable. A qualitative analysis describes why or why not an increase in VMT is likely; how much induced travel is created, if any; and whether that increase, if any, will have a significant impact.

5.3.1 INDUCED TRAVEL

Some projects have the potential to result in a significant transportation impact because they are likely to induce vehicle travel. Induced travel, or induced vehicle travel, is the “Additional vehicle travel that occurs when the cost [for travel] is lower,” after travel constraints, such as congestion, are reduced.¹² It is the increase in travel that occurs when auto travel is made more convenient by new roadway capacity. The extent that this occurs due to new roadway capacity versus other variables such as the economy (wage changes, gas prices, parking prices) and population growth varies across the body of research, but in general, changes in travel times and costs affect demand and therefore VMT. For this reason, capacity-increasing projects generally need to be evaluated for their potential induced travel. The mechanisms by which induced travel occur include:

¹² Ronald T. Milam and Jerry Walters, et al., “Induced Travel Technical Investigation Final,” Prepared For Caltrans (April 24, 2016), 1.

- Route changes (may increase or decrease overall VMT)
- Mode shift to automobile use (increases overall VMT)
- Longer trips (increases overall VMT)
- More trips (increases overall VMT)
- Location and land use changes (increases overall VMT)

Induced travel can reduce the benefits of capacity expansion projects and increase VMT over time. While a project may reduce trip duration and increase travel speed on a short-term basis, this effect may be temporary as drivers may change their travel behavior in response to the newly expanded facility, particularly during peak periods of travel (work commutes). In the long run, an expanded facility may also facilitate land development around the project. Ultimately, induced demand can lead to more and longer trips, increasing VMT; thereby, reducing travel time benefits of capacity-increasing projects.¹³ See Section 2.2 of the TAF for further details on induced travel.

HOT Lanes and VMT

While newly constructed HOV lanes may be viewed as inducing as much VMT as a new GP lane, HOT lanes can have more complicated effects. A new HOT lane is more permissive than a new HOV lane, as single-occupancy vehicles can pay to use the lane. However, new HOT lanes have the potential to offset induced travel with strategies such as using toll revenues to provide funding for VMT mitigation and adjusting tolls to achieve volumes consistent with negative or neutral VMT. Refer to Section 5.7.2 for detailed HOT lane mitigation strategies.

5.3.2 QUANTITATIVE OR QUALITATIVE ANALYSIS.

TAC Figure 3, reproduced from the TAF, provides insight on when to apply quantitative versus qualitative methods. Users should refer to the TAF for additional guidance regarding analysis of VMT impacts. There are two potential quantitative methods identified below, the travel demand model (TDM) and the National Center for Sustainable Transportation (NCST) Induced Travel Calculator. The [NCST calculator](https://ncst.ucdavis.edu/research-product/induced-travel-calculator) is an elasticity-based tool that estimates annual induced VMT for capacity expansion projects. More information on the calculator is available at: <https://ncst.ucdavis.edu/research-product/induced-travel-calculator>.

¹³ This discussion is adapted from Cervero, "Road Expansion, Urban Growth, and Induced Travel," *Journal of the American Planning Association* Vol. 69, No. 2 (Spring 2003): 146 and Duranton and Turner, "The Fundamental Law of Road Congestion: Evidence from US Cities," *American Economic Review* Vol. 101, No. 6 (2011), 2616-2617. It should be noted that there may be other benefits to congestion relief and capacity increasing projects.

Table 1. Selection Matrix for Preferred Induced Travel Assessment Method of Projects on the SHS¹

Project Type/ Location	GP or HOV Lane Addition to Interstate²	GP or HOV Lane Addition to Class 2 & 3 State Routes²	HOT Lane Addition to Interstate	HOT Lane Addition to Class 2 & 3 State Routes	Other VMT-inducing Projects & Alternatives
County in MSA with Class I Facility	Apply the NCST Calculator by MSA and/or TDM benchmarked with NCST Calculator ³	Apply the NCST Calculator by county and/or TDM benchmarked with NCST Calculator ²	Apply the NCST Calculator by MSA, TDM, and/or other quantitative methods ^{3,4}	Apply the NCST Calculator by county, TDM, and/or other quantitative methods ^{3,4}	Apply TDM or other quantitative methods ³
Other MSA County	Apply TDM or other quantitative methods ³	Apply the NCST Calculator by county and/or TDM benchmarked with NCST calculator ²	Apply TDM or other quantitative methods ³	Apply the NCST Calculator by county, TDM, and/or other quantitative methods ^{3,4}	Apply TDM or other quantitative methods ³
Rural County	Apply TDM or other quantitative methods ³	Apply TDM or other quantitative methods ³	Apply TDM or other quantitative methods ³	Apply TDM or other quantitative methods ³	Apply TDM or other quantitative methods ³

1. If preferred methods are not available, qualitative assessment is acceptable as shown in TAF Figure 5.
2. Induced VMT estimates from HOV additions to two-lane (one lane per direction) facilities and HOV-3+ or higher additions may be outside the ± 20 percent range of the NCST Calculator estimate.
3. TDMs must be checked for applicability as described in Sections 4.4 and 4.5.
4. TDM may be benchmarked with NCST Calculator.

5.3.3 CONSTRUCTION IMPACTS

Impacts associated with construction of a project may also require VMT analysis, particularly for large projects or projects located a considerable distance from urbanized areas. Generally, a qualitative analysis of VMT impacts associated from the construction of the project would be appropriate. Although in some cases lane closures may result in out-of-direction travel as people seek to avoid the construction

area, the reduction in capacity would usually disincentivize highway travel; thereby, possibly reducing VMT. Public information campaigns prior to and during roadway construction periods can effectively alert travelers to options such as available transit services and reducing trips during peak construction periods. Vehicle trips used for construction purposes would be temporary, and any generated VMT would generally be minor and limited to construction equipment and personnel and would not result in long-term trip generation.

5.4 CUMULATIVE AND INDIRECT IMPACTS

The term *cumulative impacts* refer to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental effects. Pursuant to Guidelines section 15064(h), impacts are “cumulatively considerable” when the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

For transportation impacts and with respect to VMT, a cumulative impact is a project's potential, when combined with other projects in an area or region, to significantly increase VMT. In other words, a project may contribute to a potential impact through its incremental addition to regional VMT when examined in combination with the effects of other past, present, and probable future projects. A project at an interchange, for example, may not significantly induce new VMT on its own, but when considered cumulatively with other past, present, or future probable projects in a travel corridor or region, it may be cumulatively considerable and therefore significant.

If a project has no potential to induce new VMT, or if it reduces VMT, then a cumulative analysis is not required, as the project could not contribute to a cumulatively considerable transportation impact.

Lead agencies are not required to mitigate for effects caused by other past or future projects—mitigation is required only for the project under consideration. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through project-specific mitigation, then the impact can be considered less than significant.

A project's cumulative impacts may also be rendered less than cumulatively considerable if the project was analyzed as part of, and will comply with the requirements of, a previously approved plan or mitigation program which includes enforceable requirements that will avoid or substantially lessen the cumulative impact within the geographic area in which the project is located (Guidelines

§ 15064(h)(3)). See section 5.1.2. above for considerations related to compliance with a previously approved plan or mitigation program.

Auxiliary Lanes

A common project type that has potential cumulative impacts are auxiliary lanes. A project or projects that add a series of auxiliary lanes in the same corridor should evaluate the potential for cumulative impacts. The definition of a corridor varies and is context-specific; however, according to the Introduction of the [Caltrans Corridor Planning Process Guide](#), a corridor can be defined as “a largely linear geographic band defined by existing and forecasted travel patterns involving both people and goods.” However, the final determination of a corridor should be decided upon by project teams and involved stakeholders in context of a given project. A careful examination of project alternatives and their effects on induced demand could be necessary to determine impacts from adding auxiliary lanes. If the effects of auxiliary lanes in a corridor are cumulatively considerable, mitigation may be required.

For example, it must be determined whether the series of auxiliary lanes are collectively or otherwise potentially inducing travel in the corridor, or alternatively whether each of the auxiliary lanes are operating independently and only addressing localized operational issues. If the conclusion is that each auxiliary lane is independent, and each are under one mile in length, an induced travel analysis generally should not be required. If, on the other hand, it is determined that the series of auxiliary lanes would collectively create a significant increase in VMT in the corridor, an induced travel analysis would be required.

The consideration of reasonably foreseeable probable future projects could include planned actions leading to connections among otherwise independent auxiliary lanes (i.e., connecting two auxiliary lanes through an interchange). If a project proposes to add an auxiliary lane that “connects” otherwise independent auxiliary lanes, that project should consider whether an induced travel analysis is appropriate, despite any previous determinations. In all cases, substantial evidence would be required to justify the conclusion and the decision whether to perform an induced travel analysis.

5.5 CONSISTENCY WITH PLANS

Section 15125(d) of the CEQA Guidelines requires that an EIR,
...discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Such regional plans include, but are not limited to, the applicable air quality attainment or maintenance plan or State Implementation Plan, area-wide waste treatment and water

quality control plans, regional transportation plans, regional housing allocation plans, regional blueprint plans, plans for the reduction of GHG emissions, habitat conservation plans, natural community conservation plans and regional land use plans for the protection of the Coastal Zone, Lake Tahoe Basin, San Francisco Bay, and Santa Monica Mountains.

Consistency with CARB's 2022 Scoping Plan as it pertains to both GHG emissions and any increase in VMT attributable to the project should be discussed in the "Consistency with State, Regional, and Local Plans and Programs" section of the environmental document, with references back to the Transportation and Climate Change sections, as needed. Capacity-increasing projects with the potential to lead to a measurable and substantial increase in VMT are likely to be inconsistent with state climate goals. Modeling completed by CARB for the Mobile Source Strategy shows capacity for statewide light-duty VMT growth is only five percent by 2030, as compared to the current growth rate of approximately eleven percent.¹⁴ As stated previously, consistency with an RTP/SCS does not imply consistency with state climate goals.

5.6 DETERMINING SIGNIFICANCE

At the project level, the purpose of the CEQA analysis is to determine, and identify feasible mitigation for, adverse environmental impacts, such as increases in VMT attributable to the project. CEQA does not require an improvement over baseline or existing conditions, just that a lead agency consider reasonable project alternatives and mitigate significant environmental effects of the project to the extent feasible. A "significant effect on the environment" means "A substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

5.6.1 DETERMINING SIGNIFICANCE FOR PROJECTS IN RURAL (NON-MPO) COUNTIES

For projects within the rural, non-MPO counties, significance should be addressed on a case-by-case basis, taking into account context and environmental setting.

5.6.2 DETERMINING SIGNIFICANCE FOR PROJECTS IN MPO AREAS

The determination of significance will be based on the projection of induced travel attributable to the project.

¹⁴ California Air Resources Board, "Mobile Source Strategy," May 2016, pg. 37

Within the MPO areas (including RTPAs within MPOs), a project that results in an increase in VMT when comparing the future build alternative to the future no-build alternative (i.e., the VMT is higher under the future build scenario) will generally be considered significant, and mitigation will be required. Small increases of VMT attributable to a project that are consistent with the level of increase associated with the project types on the screened list (Section 5.1), would likely not be deemed significant.

Determining significance is a three-step process. First, the impact is evaluated without any consideration of mitigation, to determine if the impact is significant or not. If the impact is significant, mitigation is required and then “applied” to the project. The level of induced travel projected generally represents the level of VMT to be mitigated in order to reduce transportation impacts to a level that is less than significant. The remaining impact is then evaluated again to determine if it remains significant or if the mitigation has reduced the impact to a less than significant level. If the impact remains significant after all feasible mitigation has been incorporated, and there are no additional, feasible alternatives which would avoid or lessen the adverse impact, a statement of overriding considerations may be appropriate to approve the project. There are instances in which an element of a project or a project feature may reduce adverse transportation impacts and should be taken into account prior to the initial significance determination.

5.7 MITIGATION

A lead agency under CEQA has the authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant adverse impacts on the environment. Where changes to the project or project alternatives cannot avoid or substantially lessen the significant impact, mitigation is required. There must be a rational relationship between the impact and the mitigation for that impact (i.e., “nexus”), and the mitigation must be roughly proportional to the impact (i.e., “proportionality”) (Guidelines § 15041 (a)).

Mitigation must be feasible and enforceable. “Feasible” under CEQA means “Capable of being achieved in a successful manner within a reasonable amount of time, taking into account economic, environmental, legal, social, and technological factors” (Guidelines § 15364). When specific economic, social, or other conditions make mitigation measures or project alternatives infeasible, individual projects may be approved in spite of one or more significant effects of the project (PRC § 21002; see also, Appendix A, “Considerations for Statements of Overriding Considerations”). As with other mitigation, any mitigation proposed for VMT impacts must be included in the project’s Environmental Commitments Record (ECR) and considered when completing the Certificate of Environmental Compliance forms at Milestones 600 and 800, as applicable.

As noted in the “Project Scoping” section of this document (Section 4), as a project proceeds toward final design it becomes increasingly difficult to achieve feasible, proportional project-level VMT mitigation for a capacity-increasing roadway project. Therefore, for capacity-increasing projects, early coordination and scoping of mitigation opportunities is advisable whether on-system or off-system mitigation is pursued. The following subsections of this document discuss on-system and off-system mitigation. Off-system mitigation, in particular, requires considerable time to identify willing partners and opportunities, perform analyses of the opportunities, and negotiate and execute agreements to fulfill mitigation commitments.

Additionality

Some of the mitigation strategies outlined in this document include investment in demand-reducing transportation facilities or programs, whether owned by Caltrans or a partner. To qualify as mitigation, such investments must produce a demonstrable negative effect on VMT. Moreover, as is the case with mitigation for any significant impact identified under a CEQA analysis, the mitigation must be “enforceable,” or relatively certain to occur. On the other hand, mitigation need not be the exclusive reason for the delivery of a VMT-reducing project. If mitigation paid for half of a transit project, for example, it would be reasonable to apply half of the resulting VMT reduction as mitigation. Many Caltrans districts and partners have developed lists of VMT-reducing projects they wish to build or improve. Induced VMT from a highway capacity project may potentially be mitigated via support for such projects. A critical step in evaluating such mitigation is to ensure that the investment provides additional resources that otherwise would not have been provided or providing the additional resources substantially earlier than they otherwise would have been available - a concept referred to as “additionality.” Projects already built, for example, would generally not qualify. Likewise, a letter of support for a VMT-reducing project would probably not qualify, unless it could be shown that the letter played a major role in advancing the project's delivery. Two indications of whether a VMT-reducing project could be considered mitigation would be its funding status and its status in a program or plan. Project proponents must evaluate funding status to determine additionality. Projects or programs listed as funded in an RTP are generally not additional and therefore not eligible as VMT mitigation, with some exceptions. Should investment in projects or programs be considered for mitigation, the PDT will need to fully evaluate the funding status of the project or program as described below. Substantial evidence that would support the use of the project or program as VMT mitigation for the project being developed would need to be documented as part of the CEQA environmental analysis.

Programmed Projects

If a project or program is listed as funded in an approved programming document, such as the Regional Transportation Improvement Program (RTIP), this implies that funds are or will be available to that project. Therefore, if a project with this level of

funding commitment was proposed for VMT mitigation for another project, it would not be providing any additional or “new” benefit to offset the VMT impact. In this circumstance, the project could not be used for VMT mitigation. However, there is a possible exception: a programmed project without dedicated full funding could be eligible to count towards mitigation, but this would require substantial justification. For the programmed project to be credited towards mitigation as a VMT-reducing measure, evidence should be provided to explain why it would not be able to move forward, “but for” the investment provided by the VMT-inducing project.

Projects in a “Fiscally-Constrained” Portion of an RTP

Projects or programs listed in the fiscally-constrained portion of a RTP often do not have any short-term funds programmed. RTPs generally cover a minimum of 20 years of forecasted funds and projects. Therefore, many projects are listed in proposed “phases” within the planning period (such as years 0-4 for the programmed projects, years 5-10 for the higher priority projects to be drawn from in the next programming cycle, and years 10-20 for projects that are identified needs, but remain as lower priorities due to the limits of anticipated funding or other discretionary considerations). Projects with this funding status may provide offsets to VMT impact in several ways: accelerating a project from a later phase to provide the benefits earlier; providing certainty of funding; and/or limiting the risk of unanticipated downturns in future funding. On the other hand, some projects included in later phases of the RTP for design or construction funding may have development funds approved for earlier or completed phases, once again suggesting that there is a current or more substantial commitment to providing funding for the project. Therefore, projects or programs in the fiscally-constrained RTP would need to individually provide substantial evidence of VMT reduction, beyond what was already committed for funding, to be used as VMT mitigation.

Projects in an “Unconstrained” Portion of an RTP

Projects or programs listed in the unconstrained portion of an RTP have no funding programmed or anticipated during the planning period covered by the Plan. In essence, these projects are recognized as needs, but the estimate of funding likely to be available during the planning period is not enough to provide funding for these projects and the investments required for the projects in the fiscally-constrained portion of the plan. Therefore, projects from this portion of the RTP that are evaluated to provide benefits to offset VMT impacts could be accelerated and therefore appropriate for VMT mitigation, as the benefits would be in addition to those that are already committed, funded, or planned for funding.

On-system mitigation are measures which can be implemented within the Caltrans right-of-way. On-system mitigation may include mitigation within or outside the initial project limits of any given capacity increasing project. Caltrans, as owner and

operator of the SHS and associated right-of-way, exercises more direct authority over on-system measures as opposed to off-system measures. Off-system mitigation, outside Caltrans' right-of-way, requires cooperation with those jurisdictions that have influence over land use and transportation systems outside of Caltrans direct control.

5.7.1 MITIGATION OFF THE SHS

The Caltrans Division of Transportation Planning completed a literature review and assessment of VMT and GHG reduction strategies. The measures that resulted in the largest decreases in VMT are generally off-system and not under Caltrans' direct control, such as land use authority, cordon pricing¹⁵ authority, parking management/pricing, and employer-based transportation demand management strategies. Close coordination with federal, state, and regional transportation partners would be required to implement such off-system VMT mitigation.

The most cost-effective measures identified in the literature review included transit-oriented development, transportation demand management, and VMT-efficient housing projects, etc.

There is generally a need for cost-effective, feasible, and proportional VMT mitigation measures, not just for Caltrans' projects, but for local lead agencies statewide that must comply with CEQA. Caltrans may ultimately develop or participate in a VMT credit or banking and exchange system¹⁶ operated by Caltrans, an MPO, RTPA, or another entity. Under a banking system, Caltrans could purchase mitigation credits to reduce project impacts related to VMT. The revenues from the credit purchases could be utilized by the bank to facilitate the development of VMT-reducing projects. For example, the bank could invest in infrastructure improvements such as pedestrian facilities or aid in the development of regional transportation options, such as light rail. An exchange system might be similarly structured. In exchange for implementing a project that induces VMT, Caltrans would invest in a project identified by a local or regional transportation partner that reduces VMT. One example of a system that relies on VMT reduction as a nexus is the City of Los Angeles Westside Mobility Plan Transportation Impact Fee Program.

VMT-reduction measures in rural areas may benefit from a coordinated approach. OPR has posted a document that includes strategies for different types of rural

¹⁵ "Cordon pricing" is a form of zone-based pricing in which drivers are charged either fixed or variable fees to drive within or into a congested area within a city (FHWA, "Zone-Based Pricing" available at: https://ops.fhwa.dot.gov/congestionpricing/strategies/involving_tolls/zone_based.htm).

communities which can be found at: [http://opr.ca.gov/docs/Mitigating_Vehicle-Miles_Traveled_\(VMT\)_in_Rural_Development.pdf](http://opr.ca.gov/docs/Mitigating_Vehicle-Miles_Traveled_(VMT)_in_Rural_Development.pdf).

Housing and VMT

One of the more effective strategies that may be used to mitigate induced travel is the facilitation of VMT-efficient housing projects. For projects that are likely to induce substantial amounts of VMT, PDTs must consider facilitating the development of infill, and/or transit-oriented housing that can demonstrate a reduction in VMT, e.g., through compactness and affordability. This type of VMT mitigation could be applied either individually during a project-level analysis, or at a programmatic or regional level by tiering from a programmatic environmental document. In 2010, the California Air Pollution Control Officers Association (CAPCOA) published the “Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity” (Handbook). The Handbook, which was updated in December 2021, included a compilation of VMT-reducing measures. While the Handbook is primarily aimed at GHG impacts, in many instances, GHG reductions can be accomplished through VMT reductions. As such, the Handbook's descriptions of measures and quantification are useful for considering VMT mitigation for roadway expansions. The CAPCOA Handbook was important for the development of the July 2022 “Caltrans SB 743 Program Mitigation Playbook” (Playbook). The Playbook built on the substantial quantitative procedures contained in the Handbook to provide practitioners guidance on applying the various strategies to transportation projects that are anticipated to generate induced travel.

For the topic of residential land use (i.e., density and affordability), the Playbook states:

Compact housing can reduce VMT compared to housing that is lower density. Affordable housing produces less VMT compared to market-rate housing. To the extent a project contributes to such housing, it can take credit for the VMT reduction compared to business as usual. Compared to other options, denser, more affordable housing is a powerful VMT-reduction tool. The Playbook (page 15) and the CAPCOA Handbook (pages 70-72) specify that to qualify as VMT-reducing housing, the density of the development should be at least 9.1 dwelling units per acre or more.

The Playbook further notes, as an example:

If a project contributes half of the backing (funding, land, infrastructure, etc.) needed to deliver the housing units that reduce VMT by 10,000 miles/day, it could claim 5,000 miles/day as VMT reduction.

However, this section of the Playbook also suggests a “proportional” VMT reduction to match the financial contribution toward the denser, more affordable housing warrants further consideration. When taking credit for any CEQA mitigation, as long as the mitigation is not deferred, is feasible, is enforceable or meets performance criteria, a project sponsor/lead need not be the sole funding contributor to take credit for the mitigation. This is the case exemplified by in-lieu fee payments, mitigation banks, or similar exchange models whereby the project sponsor/lead does not undertake the mitigation, but instead transacts with another entity to undertake the restoration, preservation, or other mitigation action. Therefore, a project sponsor/lead can take “credit” for mitigation it purchases as long as the mitigation is enforceable, etc., as noted above and there is a mechanism in place to prevent “double counting” of the mitigation “credit.” With these assurances in place, a transportation project can take the full mitigation credit of a housing development if it could be shown that “but for” the contribution, the housing project would not have been developed. These conditions and assurances would likely be included in and enforced through a funding agreement.

5.7.2 MITIGATION ON THE SHS

As indicated previously, on-system mitigation tends to be more within Caltrans' direct authority. However, this does not mean that Caltrans may unilaterally decide to implement measures within its right-of-way. For example, tolling strategies will require early coordination or consideration as a project scoping alternative, with appropriate transportation planning agencies and may require approval from other agencies such as the California Transportation Commission or the Federal Highway Administration. In many cases, tolling strategies have the potential to provide substantial VMT reduction.

HOT Lanes Mitigation Strategies

As mentioned in Section 5.3.1, new HOT lanes have the potential to offset induced travel with strategies such as using toll revenues to provide funding for VMT mitigation and adjusting tolls to achieve volumes consistent with negative or neutral VMT. Potential HOT lane mitigation strategies and considerations are as follows:

Availability of toll revenue for VMT-reducing strategies

If revenues are committed to VMT-reducing strategies, they could offset induced travel associated with the HOT lane addition. It is essential to have a commitment and not a “promise” or “intention” to provide revenue for VMT mitigation activities. This commitment would need to be documented in the project's (ECR) and in the financial planning for the HOT lane addition, including a strategy for making up any shortfall in revenue projections.

Commitment to toll adjustment to ensure VMT reduction

There needs to be a strong commitment to adjusting toll levels (and/or HOV policies such as occupancy requirements and clean air vehicles (CAV) discounts) to achieve volumes consistent with negative or neutral induced VMT. By the time the final environmental document is completed, a procedure for exactly what would trigger a change in the toll level (and/or HOV policy), how often the reviews would take place, and how the different strategies ensure a reduction of the induced VMT (higher tolling and/or HOV requirements) would need to be determined.

GP to HOT conversion + HOT addition together

Another strategy that may be proposed is to convert an existing GP lane to a HOT lane while also adding another HOT lane at the same time (6 GP lane existing freeway to 4 GP lanes + 4 HOT lanes, for example). The potential for VMT inducement may be moderated and/or reduced by eliminating the two GP lanes. Still, it would also have to account for the possibility of induced VMT related to the overall addition of lanes available. This strategy would require a thorough analysis of the mix of traffic on the existing facility, merge movements and/or geometrics, the operations of the existing GP lanes, the potential for carpool formation, and other issues such as transit priority (see below).

Provision of transit priority

If the HOT lane addition provides for transit vehicle priority that does not currently exist, that could be a consideration in the approval of a project and the mitigation of the induced VMT. Transit priority could include adding features that go beyond the HOT lane addition itself (signal pre-emption/prioritization at ramps, bypass lanes, on-ramps, etc.). It would be necessary in this case to confirm the improved service that either exists or would be put in place in conjunction with the HOT lane addition by receiving a written commitment from the appropriate transit operator. Transit priority should also include an analysis of the improved transit service (reduced travel time, increased travel time reliability and frequencies, expected increased ridership from service expansion, etc.).

In addition to the measures noted above, all projects should consider strategies within the direct control of Caltrans and on the SHS. Measures listed in TAC Table 2 may be implemented to reduce VMT. Incorporating these types of measures as early as possible in the project development process will increase their feasibility. In certain circumstances, on-system measures may be able to sufficiently mitigate VMT attributable to a project or provide additional mitigation in situations where strategies beyond Caltrans' direct control are limited.

Additional measures and their approximate VMT-reduction potential can be found in the Caltrans Division of Transportation Planning's *Literature Review and Assessment of VMT and GHG Mitigation Strategies* as well as the transportation measures found in the CAPCOA *Quantifying Greenhouse Gas Mitigation Measures: A Resource for*

Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures. See Appendix C-1 in this document for more information on these and other resources related to mitigation. Appendix C-2 also provides some frequently asked questions and answers.

Equity

Some question the equity impacts that any type of pricing strategy may bring to the highway system by requiring underserved users of the system to pay an additional fee or toll. However, this situation is more complex as “free” lanes are not necessarily equitable. Carefully designed pricing strategies can improve equity by increasing choice for underserved users. Lower-income users may use a HOT lane to increase reliability during critical trips. Additionally, pricing systems allow the redistribution of toll revenues towards rebates, discounts, or the transferring of revenues to transit and mobility improvements in the corridor. Implementing tolls as a demand management measure can play a role in paying for transit and reducing the impact of pricing on low-income individuals. Equity must be considered in any redistribution of benefits.

While there may be different perspectives regarding the equity impacts of pricing strategies on the highway system, any project that includes pricing needs to address equity implications and ensure that pricing is applied in a way that does not result in disproportionate impacts.

Table 1. Project-Level Measures to Reduce VMT on the SHS

Description
1. Include detours for bicycles and pedestrians in all areas potentially affected by project construction.
2. Incorporate Complete Streets Elements
3. Consider and accommodate alternate modes of transportation consistent with the purpose and need of the project: <ul style="list-style-type: none"> • Bicycle paths and facilities • Pedestrian infrastructure and pedestrian-friendly features (wide sidewalks, overpasses on busy roads, signalized intersections with appropriate signal timing, etc.) • Routes connecting to public transportation
4. Include measures to support multi modal transportation that will offset project impacts: additional Park & Ride lots
5. Social marketing efforts and incentives promoting mass transportation and carpooling. (Possible use of Cap and Trade Funds)
6. Social marketing and public education activities to improve awareness of the impacts of driving habits and opportunities to reduce climate change impacts.
7. Incorporate infrastructure electrification into project design (e.g., charging for electric bikes).
8. Implement intelligent transportation systems and transportation demand management elements to smooth traffic flow and increase system efficiency.
9. Implement Traffic Management Strategies: <ul style="list-style-type: none"> • Modify roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. Coordinate improvements on the SHS with arterials roadways. • Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, if determined feasible and applicable by the Lead Agency.

5.8 RELATED MITIGATION

It is important to note that mitigation that reduces VMT may also be identified as mitigation for adverse impacts associated with noise, energy, GHG emissions, criteria air pollutants, or toxic air contaminants resulting from the project.

5.9 STATEMENTS OF OVERRIDING CONSIDERATIONS

If the lead agency cannot identify and implement feasible and enforceable mitigation to reduce the impact to a level that is less than significant, then it should document and disclose those impacts as significant and unavoidable. Under CEQA, if a lead agency approves a project which will result in significant effects that are identified in the final EIR but are not avoided or substantially lessened, and if those

impacts are outweighed by the economic, legal, social, technological, or other benefits of the project, including region-wide or statewide environmental benefits, the lead agency shall state in writing the specific reasons to support its decision based on the final EIR and/or other information in the record. This “statement of overriding considerations” (SOC) shall be supported by substantial evidence in the record and included in the record of the project approval. It must also be mentioned in the Notice of Determination filed with OPR. Refer to Appendix A-1 for important considerations when preparing a SOC.

Caltrans instituted a process in April 2022 for assessing SHS roadway capacity-increasing projects at risk of being unable to fully mitigate VMT impacts. This process involves reviews and concurrence steps between districts and Headquarters in the Project Initiation and Project Approval and Environmental Document phases. The Caltrans Director must approve any projects that do not mitigate VMT to below a level of significance. Refer to Appendix A-2 for general considerations for the PDT during the VMT review process.

APPENDIX A-1. CONSIDERATIONS FOR STATEMENTS OF OVERRIDING CONSIDERATIONS

A statement of overriding considerations may be prepared when the project's effects are significant and not fully mitigable. According to Guidelines Section 15021(d):

CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian.

The specific requirements for a statement of overriding considerations are found in the Guidelines Section 15093:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."*
- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.*
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.*

Good places to start for the statement of overriding considerations are both the Purpose and Need statement for the project as well as the rationale used for the selection of the preferred alternative. Beyond the Purpose and Need statement, lead agencies have substantial discretion in weighing specified economic,

environmental, and social factors which are relevant to their decision making. Any supporting factors relied upon by the lead agency should be documented in the agency's records relating to the project.

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APPENDIX A-2. CONSIDERATIONS FOR CALTRANS AND PROJECT DEVELOPMENT TEAMS

Since SB 743 implementation in 2020, Caltrans has addressed vehicle-miles traveled (VMT) as a negative environmental impact under the California Environmental Quality Act (CEQA) and its implementing regulations (“Guidelines”). In practice, this means analyzing, avoiding, and mitigating induced VMT that results from projects on the State Highway System.

Environmental analysis sometimes provides “bright-line” rules. For example, where resource agencies dictate policy regarding wetlands, a “no net reduction” in wetland areas is generally acceptable. With respect to other resources analyzed under CEQA, lead agencies such as Caltrans have substantial discretion to determine the extent to which various public policies may warrant the approval of a project, notwithstanding the potential that the project may cause significant adverse impacts. (See for example Public Resources Code section 21081.) Induced travel falls into this latter category. Under Caltrans’ “Transportation Analysis Framework/Transportation Analysis under CEQA” (TAF/TAC) guidance documents that implement Public Resources Code section 21099, Caltrans must forecast the induced VMT attributable to its projects and demonstrate efforts to identify and implement mitigation measures. CEQA requires all “feasible” mitigation be applied. CEQA cites timing as well as “economic, environmental, social, and technological factors” as considerations in determining feasibility (Public Resources Code section 21061.1). Lead agencies, such as Caltrans, are left to determine what level of effort, allocation of resources, or technical difficulty is required for something to be considered infeasible. Minimal efforts on mitigation may be subject to legal challenge, but in general, and assuming substantial evidence supports the conclusion, lead agencies have leeway to decide what is feasible in terms of mitigation. Part of the determination of feasibility for a particular mitigation measure may include the commitment of funding on an ongoing basis for a strategy that requires continuous operational support.

When a lead agency formally approves a project, whose substantial adverse impacts will not or cannot be fully mitigated, it must issue a Statement of Overriding Considerations (SOC) as part of the CEQA process. According to the Guidelines, “CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project” (Title 14 Cal. Code Regs. §15093).

What follows is not intended as rigid guidance, but instead as insight into the process Caltrans will employ in making its decisions on whether a VMT-inducing

project may proceed. Every project is unique and may trigger different considerations or different weighing of benefits and impacts than what is described here. The examples provided are possible illustrations of how some types of projects might be viewed, based in part on these general considerations:

1. Has the project development team (PDT) worked thoroughly to identify VMT-reducing or -neutral project alternatives, and provided a compelling reason for not selecting those alternatives?
2. Has the PDT described its efforts to revise the preferred alternative to eliminate or minimize induced VMT?
3. Has the PDT worked thoroughly to identify VMT-mitigation options including those regarding active transportation, transit, land use, lane management, and transportation demand management? In that effort, has the PDT meaningfully engaged partners and affected communities on anticipated VMT impacts and meaningful mitigation options?
4. Has the PDT availed itself of feasible mitigation options, including those that require enforceable agreements with partners?
5. Has the PDT fully considered ongoing funding commitments that may be required to support operations of a particular mitigation measure over a sustained period? Is there an identified funding stream such as toll revenue that can be accessed?
6. Has the PDT considered the organizational structure or entity that will be used to assure that ongoing VMT mitigation strategies are funded and carried out is in place (commitments from government agencies, Transportation Management Agencies, or other entities capable of making ongoing funding commitments)?
7. Has the PDT documented the facts and rationale used when concluding mitigation options not included were deemed to be infeasible? (While mitigation may add substantial costs to a project, there is no firm upper limit on such costs. In order to demonstrate that a mitigation measure is infeasible due to cost, the PDT must show that it explored and exhausted all reasonable methods for funding the measure. Project development delays are generally not sufficient reasons for considering a mitigation option infeasible.)
8. Has the PDT shown that mobility benefits from the project will not be eroded by induced VMT attributable to the project?

If project teams can successfully address considerations such as those above, as they apply to the project, Caltrans will weigh whether the project's benefits outweigh the negative VMT impacts. Caltrans may be able to be more definitive in this judgment over time, as projects are reviewed, and the courts weigh in. For now, these are some examples of potential reasons to move forward with a project with induced VMT that is not mitigated below a level of significance, with some additional specific considerations relevant to each:

- Roadway capacity changes necessary to reduce fatal and severe injury crashes. Project teams should demonstrate that operational or other non-VMT-generating options would not be effective and should also cite crash histories and locations or other specific data showing the need for the proposed safety improvement. Any crash modification factors (CMFs), or countermeasures cited should relate to effectiveness in reducing fatal and severe injuries. Safety measures should be consistent with a safe-systems approach. Any VMT increases are forecast would likely lead to safety degradation, e.g., at freeway ramps where added traffic from induced VMT poses hazards to active travelers and motorists on surface streets, raising the burden on the project to show a safety benefit.
- Projects that occur in low-congestion conditions and that 1) do not substantially affect travel times, now or in the future, or 2) do not serve as low-density development attractors. In these cases, even where lane-miles-based tools may suggest induced VMT, the context may argue that such effects will be less than significant. Any project that promises to create time-travel savings and attendant economic benefits, as calculated in the CalBC or similar tools, would not qualify for such consideration, by definition.
- Projects that may induce VMT at the project level but can be shown to have a greater downward effect as an element in a system or corridor. A new managed-lane segment may induce VMT, but if it allows for new system-level roadway pricing that provides funding for non-auto travel, it may have a net benefit for VMT. Note the future condition would need to be enforceable and demonstrably effective in lowering VMT, as not all managed-lane strategies would do so.
- Projects envisioned as part of a VMT-neutral corridor plan, even if the projects themselves do induce VMT. Again, the corridor plan would need to be enforceable. If the VMT-inducing project comes after the VMT-reducing elements of the corridor plan, a showing that both were conceived as a coherent plan or joint development would be needed. A lengthy time gap between the projects will make that showing more difficult.
- Projects providing for evacuation routes. Such projects would need to be consistent with one or more of the following: 1) an adopted emergency operations plan, 2) a local general plan safety element that has been updated and adopted pursuant to evacuation route information requirements in Government Code 65302(g)(5) and 65302.15 (see SB 99 [2019] and AB 747 [2019], or 3) recommendations issued by the Board of Forestry and Fire Protection, in consultation with the State Fire Marshall and the local agency, to improve safety of a subdivision with more than 30 dwelling units lacking a secondary egress that is determined by the Board and the State Fire Marshall to be at significant risk, pursuant to Public Resources Code 4290.5. As stated in the list of considerations above, VMT-neutral solutions, such as reversible lanes or improved shoulders that could be

used to provide equally effective and safe evacuations, must be shown to be infeasible.

- Projects that Caltrans believes have been mitigated to a level below significance, but where measurements are qualitative or imprecise or where indefinite ongoing mitigation funding is not assured. A Statement of Overriding Consideration, addressing any "significant and unavoidable" VMT resulting from the imprecision or uncertainty, could be appropriate.

Caltrans instituted a process in April 2022 for assessing SHS roadway capacity-increasing projects at risk of being unable to fully mitigate VMT impacts. This process involves reviews and concurrence steps between districts and Headquarters in the Project Initiation and Project Approval and Environmental Document phases. The Caltrans Director must approve any projects that do not mitigate VMT to below a level of significance.

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APPENDIX B. CEQA GUIDELINES, APPENDIX G CHECKLIST QUESTIONS

The Traffic and Transportation section of the environmental document should address the following remaining CEQA Checklist questions for each alternative under consideration, including the no-build alternative.

Would the project:

Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The practitioner should assess and discuss the consistency of the alternatives with the relevant plans that address the circulation system including any Caltrans plans for the project area, the circulation element of the general plan, area-specific plans, transit planning document, district-specific bicycle and/or pedestrian plans, regional transportation plans, etc. Be certain to discuss the relevant project features (including standardized measures) that have been incorporated into the project to avoid or minimize the project's environmental impacts. If an alternative was modified to achieve consistency with an adopted program, plan, ordinance or policy addressing the circulation system, describe that here. *Please note that consistency with California's 2022 Climate Change Scoping Plan will be addressed in the Greenhouse Gas section of the environmental document under the applicable CEQA Checklist question.*

Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

In general, a transportation project is unlikely to substantially increase hazards.

Include information here from the project's purpose and need and project description to determine how a project will address non-standard geometric features such as horizontal and vertical curves, median width, shoulder width, access control, measures included to reduce flooding events, interchange improvements, separated bike lanes and/or other improvements for bicyclists and/or pedestrians or incompatible uses (for example, including wider shoulders for farm equipment in rural areas).

If the project is a safety project, explain how the project will improve safety. A project-level traffic analysis should include a safety analysis based on the Caltrans Traffic Accident Surveillance and Analysis System or other historical safety performance results. The implementation of performance-based decision-making using the Highway Safety Manual is encouraged to facilitate the integration of quantitative

collision frequency and severity performance measures into roadway planning, design, operations, and maintenance decisions.

Result in inadequate emergency access?

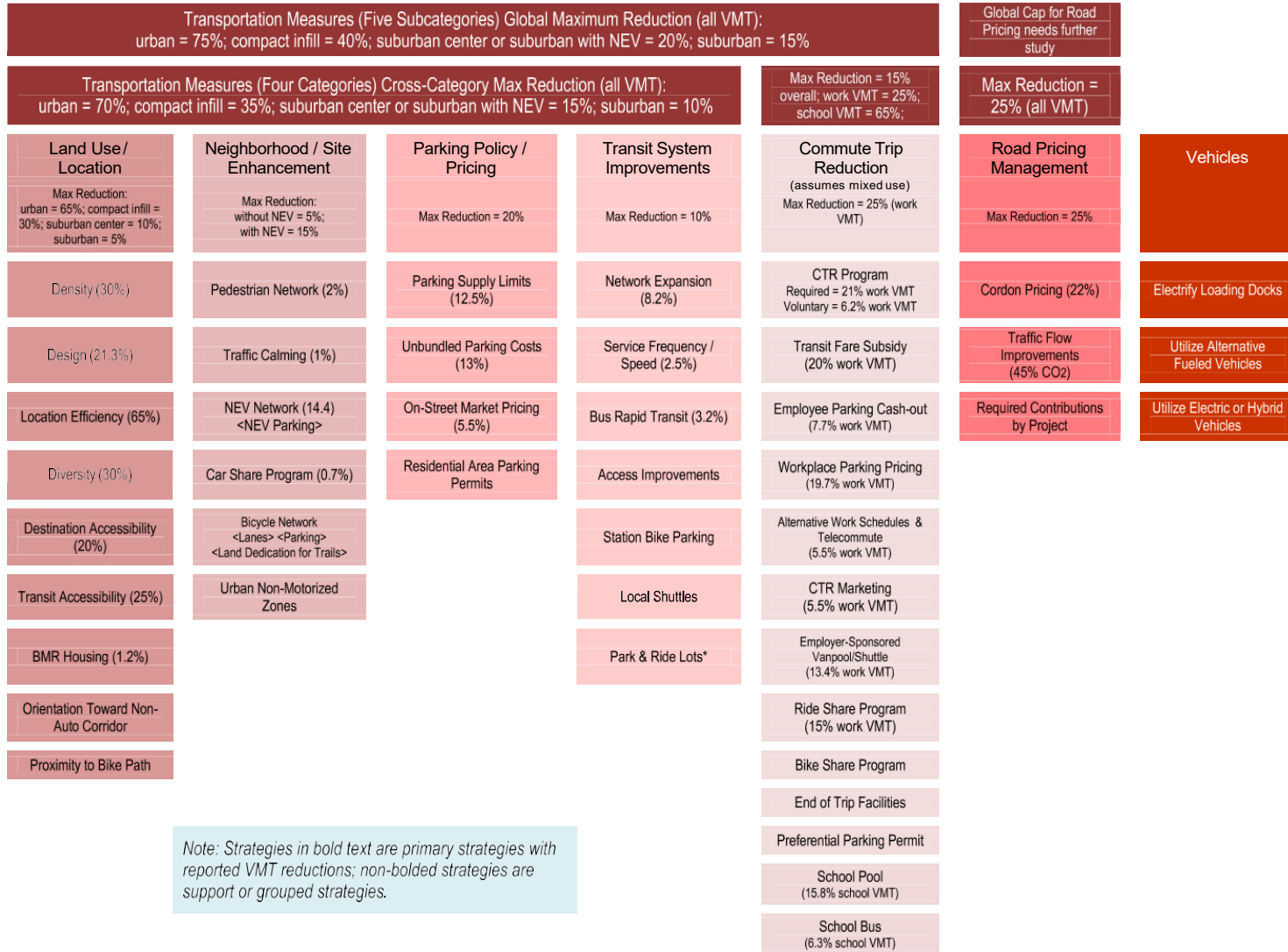
In general, most projects either improve, or do not diminish, emergency access and/or response times. For example, projects that provide prioritized signalization to emergency vehicles can decrease emergency response time. Projects that create another means of ingress and egress can also improve emergency access. Projects that widen shoulders can provide additional areas for emergency response vehicle staging. There could be temporary construction impacts related to emergency access. This should be addressed in the Transportation Management Plan for the project and Caltrans should coordinate with local emergency officials as part of the development of that plan.

APPENDIX C-1. MITIGATION

Strategies to mitigate VMT are available within the following resources. Additional mitigation resources will be added to Caltrans SB 743 Implementation webpage. The following pages include additional information on the CAPCOA report (as referenced in item “a” below).

- a. California Air Pollution Control Officers Association's (CAPCOA) [2010 Quantifying GHG Mitigation Measures](#) is a current source of VMT reduction by mitigation strategy. (See attached table 6-2 from the CAPCOA report summarizing mitigation options).
- b. Governor's Office of Planning and Research's CEQA Guidelines Update and Technical Advisory [website](#) has information on VMT reduction strategies, even for rural areas.
- c. A 2018 [research paper](#) from University of California Berkeley School of Law's Center for Law, Energy & the Environment focuses on two innovative models that could be used to implement programmatic VMT mitigation strategies for land use or transportation projects. VMT mitigation “banks” and “exchanges” are compared, and examples are provided of ways to mitigate VMT under CEQA or the mitigation fee act. These models are conceptually similar to existing mitigation frameworks such as regional impact fee programs or habitat conservation banks.
- d. A 2020 white paper prepared by Fehr & Peers [VMT Mitigation Through Banks and Exchanges: Understanding New Mitigation Approaches](#) highlights potential VMT mitigation programs including impact fee programs, mitigation exchange, and mitigation banks.
- e. State Smart Transportation Initiative (SSTI) 2018 report [Modernizing Mitigation: A Demand-Centered Approach](#) outlines partnerships possible to reduce the demand for driving.
- f. The July 2022 [Caltrans SB 743 Program Mitigation Playbook](#) built on the substantial quantitative procedures contained in the CAPCOA Handbook to provide practitioners guidance on applying the various strategies to transportation projects that are anticipated to generate induced travel.

Figure C-1. Chart 6-2 of the CAPCOA Report



APPENDIX C-2. VMT MITIGATION Q&A

Between issuance of the first and second editions of the TAC, the Director's Office of Sustainability and the SB 743 Management Team have received many questions related to the potential mitigation of VMT impacts for transportation projects on the SHS. Several of the most common questions are addressed below.

Q: What about the proximity of VMT mitigation strategies - how far away can they be from the project?

A: While there is no specific distance or geographic area to point to, generally, the more proximate the mitigation is to the impact, the better. For example, if an impact is identified for a particular community, the benefits of the mitigation should be equitably shared by that community. However, given the broad impacts of increasing VMT, VMT mitigation that has a larger geographic reach than the project corridor can still be considered, as long as the equity considerations are addressed.

Q: Doesn't VMT mitigation have to involve only transportation projects, programs, and stakeholders?

A: No. There are several programs and strategies that have been shown to reduce VMT that are not directly related to improvements to the highway system. For example, denser or more affordable housing can lessen the need for driving in the future, as can expansion of transportation demand management programs. Including support for these kinds of land uses and programs can be an effective method of lowering VMT and can constitute mitigation under CEQA. These kinds of strategies require outreach and the establishment of partnerships that go beyond the "usual" transportation project stakeholders. Forming these types of partnerships has occurred in the past for other transportation project impacts, such as encroachment into sensitive natural habits.

Q: Shouldn't all VMT mitigation features that are considered for a transportation project be biddable and buildable, just like the project's design plans?

A: Not necessarily. If specific multimodal features are included in a project's design (such as bicycle or transit facilities), then they need to be properly incorporated into the plans, whether the design is done by Caltrans or other partner agencies. However, there are many non-capital strategies that reduce VMT (such as demand management programs) that can be included in the

scope of a highway project to address the induced VMT impacts. CEQA does require that these be "enforceable", meaning firmly committed to by the relevant parties.

Q: How can transportation funds be used for non-transportation VMT mitigation expenditures?

A: In the same way that transportation funds are used for mitigation of other non-transportation impacts (sensitive habitats, cultural resources, etc.), funds can appropriately be added into highway project budgets to mitigate VMT impacts, which are recognized under the California Environmental Quality Act (CEQA). For example, just as Article 19 (gas tax) funds can be used to acquire off-project land for wetland remediation, they could be used for off-system housing, TDM, or transit support, including transit operating expenses.

APPENDIX D. GLOSSARY OF ACRONYMS AND TERMS

AB	Assembly Bill
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CTF	Cleaner Technologies and Fuels Scenario
ECR	Environmental Commitments Report
EIR	Environmental Impact Report (state)
FHWA	Federal Highway Administration
GP	General Purpose lane
GHG	Greenhouse gas
HCM	Highway Capacity Manual
HOV	High Occupancy Vehicle lane
HOT	High Occupancy Toll lane
HSM	Highway Safety Manual
IS	Initial Study (state)
LD-IGR	Local Development-Intergovernmental Review
LOS	Level of Service
MND	Mitigated Negative Declaration (state)
MPO	Metropolitan Planning Organization
MTP	Metropolitan Transportation Plan
NCST	National Center for Sustainable Transportation
ND	Negative Declaration (state)
NEPA	National Environmental Policy Act
OPR	Governor's Office of Planning and Research
PDT	Project Development Team
PRC	Public Resources Code (state)
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
SB	Senate Bill
SCS	Sustainable Communities Strategy
SHS	State Highway System
TAF	Caltrans Transportation Analysis Framework
TISG	Transportation Impact Study Guide
VMT	Vehicle Miles Traveled

Capacity	The Sixth Edition of the Highway Capacity Manual defines capacity as: The maximum sustainable hourly flow rate at which persons or vehicles reasonably can be expected to traverse a point or a uniform section of a lane or roadway during a given time period under prevailing roadway, environmental, traffic, and control conditions.
Elasticity	Elasticity is a measure of a variable's sensitivity to a change in another variable. In economics, elasticity is the measurement of the percentage change of one economic variable in response to a change in another. In transportation forecasting, an example is elasticity of travel demand, which can be expressed as the percent change in regional VMT divided by the percent change in regional lane miles of state highways.
Induced Travel (VMT)	<p>Induced travel (or the VMT attributable to a transportation capacity increase) is the increased amount of vehicle travel on the transportation network that is caused by travel behavior changes associated with decreased cost of travel due to improved travel times, improved reliability, or reduced price of travel.</p> <p>Over the short run, travel behavior changes including longer trips, more trips, mode shift, and route shift all tend to occur as a result of a highway capacity increase. Over the long run, these effects intensify (e.g., as people shift job or residential location to benefit from the infrastructure), and also land use development may become more dispersed, adding additional vehicle travel; for these reasons, long run induced travel is generally greater than short run induced travel.</p>
Network	The connectivity of a transportation system. Changes in connectivity may change travel time and cost. Travel demand models will usually represent network connectivity within modes and across modes through a set of links connecting nodes.
Travel Demand Model	A travel demand model is any relatively complex computerized set of procedures for predicting future trip making as a function of land use, demographics, travel costs, the road system, and the transit system. These models often cover an entire metropolitan area or the entire State, but may also focus on a single city or county.

Transit	Transit generally includes all forms of shared common carrier passenger ground transportation in moderate to high capacity vehicles ranging from dial-a-ride vans to buses, trolleys, light rail, commuter rail, and intercity rail transportation.
Trucks	Trucks are a subtype of the heavy vehicles category which includes trucks, intercity buses, and recreational vehicles. This Framework follows the Highway Capacity Manual definition of what constitutes a heavy vehicle: “A vehicle with more than four wheels touching the pavement during normal operation.” This is consistent with the Caltrans Traffic Census definition of a truck: “The two-axle (truck) class includes 1-1/2-ton trucks with dual rear tires and excludes pickups and vans with only four tires.”
Vehicle Miles Traveled (VMT)	The number of miles traveled by motor vehicles on roadways in a given area over a given time period. VMT may be subdivided for reporting and analysis purposes into single occupant passenger vehicles (SOVs), high occupancy vehicles (HOVs), buses, trains, light duty trucks, and heavy-duty trucks. For example, an air quality analysis may require daily VMT by vehicle class and average speed or vehicle operating mode (idle, acceleration, cruise, deceleration, etc.). For a CEQA compliant transportation impact analysis, automobile VMT (cars and light trucks) may be evaluated.
VMT Attributable to a Project	In the context of a CEQA analysis, the VMT attributable to a transportation project, or induced travel, is the difference in passenger VMT between the “with project” and “without project” alternatives. VMT attributable to a project is equivalent to induced travel in this context.