



Q & A: VMT CEQA Significance Determinations for State Highway System Projects Implementation Timeline Memorandum

The questions addressed below were compiled based on input received during informal review of the Caltrans *VMT CEQA Significance Determinations for State Highway System Projects Implementation Timeline Memorandum (Implementation Timing Memo)*:

1) What is the purpose of the Caltrans Implementation Timing Memo?

The Caltrans SB 743 *VMT CEQA Significance Determinations for State Highway System Projects Implementation Timeline Memorandum (Implementation Timing Memo)* explains Caltrans policy relating to the phasing in of VMT as the primary metric to be used in CEQA analysis of transportation impacts for projects on the State Highway System (SHS).

2) Why has Caltrans decided to use vehicle miles traveled (VMT) as the primary metric in CEQA transportation analysis for projects on the SHS?

Consistent with the OPR Technical Advisory,¹ Caltrans has selected VMT as the primary metric in CEQA transportation analysis for projects on the SHS because VMT increases may be associated with transportation projects, and VMT reductions are needed to achieve California's long-term greenhouse gas (GHG) emissions reduction targets and other state goals relating to SHS operations, public health, and environmental protection.

VMT impacts human health and the natural environment. Human health is impacted as increases in vehicle travel lead to more vehicle crashes, poor air quality, increases in chronic disease associated with reduced physical activity, and worse mental health. Increases in vehicle travel also negatively affect other road users, including pedestrians, cyclists, other motorists, and many transit users. The natural environment is impacted as higher VMT leads to more collisions with wildlife and fragments habitat. Additionally, development that leads to more vehicle travel also tends to consume more energy, water, and open space (including farmland and sensitive habitat). This increase in impermeable surfaces raises the flood risk and pollutant transport into waterways.

Note that for projects off the SHS, sponsor agencies have discretion to select metrics other than VMT for use in CEQA transportation analysis.

¹ OPR, 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." Pages 1-4.
http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

**3) Will SB 743 policy impact voter-approved programs?**

Caltrans policy of implementing SB 743 through use of vehicle miles traveled as the primary metric in CEQA review will be applied to all projects on the SHS regardless of funding source or sponsor agency. This means that the policy will affect CEQA review of capacity-increasing projects on the SHS that are included in voter-approved programs. Transit, bicycle and pedestrian infrastructure projects are among the project types that will not be subject to VMT analysis.

4) Why does the Memorandum focus on the M020 milestone?

Milestone 020 is Caltrans' "Begin Environmental" milestone—the date that environmental studies are initiated. This was chosen over the Notice of Preparation (NOP) date familiar to many CEQA practitioners because NOPs are prepared only when an EIR is prepared. Other environmental documents, such as Initial Studies, Negative Declarations, and Mitigated Negative Declarations, do not require a NOP.

5) Is the State's population projected to grow by year 2050?

Yes, the California Department of Finance projects that the State's population will grow by 12.26% (2019 – 2050).²

6) Will Caltrans adopt a VMT threshold? If yes, what will the adopted threshold be?

Caltrans will not be adopting a VMT threshold, consistent with our standard CEQA practice. CEQA significance determinations will be made on the basis of substantial evidence.

7) Will Caltrans provide guidance on VMT mitigation and quantifying mitigation benefit?

Yes, Caltrans is in the process of developing and organizing research, materials, and best practices related to mitigating induced VMT. The Caltrans [SB 743 website](#) has some mitigation resources posted, but expect more resources to be posted in the coming months. Additionally, Caltrans is supporting multiple research studies regarding mitigation of induced VMT. The *draft Transportation Analysis Under CEQA guidance document (TAC)*, located on the Caltrans [SB 743 website](#), provides some guidance on mitigation in Section 5.7 and identifies mitigation resources in Appendix 3.

8) Will Caltrans provide guidance on VMT methodology and opportunities to ask specific questions on modeling?

Yes, guidance of VMT methodology is provided in the *draft Transportation Analysis Framework (TAF)* document, located on the Caltrans [SB 743 website](#). Informal

² California Department of Finance, 2020. 2050 population projection and 2019 population estimate based on data released on 01.10.2020. <http://www.dof.ca.gov/Forecasting/Demographics/Projections/>



feedback on the VMT methodology included in the draft TAF is welcome during the 60-day review period to close on June 15, 2020.

Caltrans will hold a series of informational webinars regarding the guidance documents (TISG, TAF, and TAC). More information regarding the webinars will be announced via email. The Webinar recordings and other training resources will be posted to the Caltrans [SB 743 website](#).

9) I think my project will not have a VMT impact. Will Caltrans provide more guidance on the screening process?

The CEQA screening process is addressed in Section 5.1 of the Draft TAC, found on the Caltrans [SB 743 website](#).

10) Are overcrossings on local highways considered as being on the SHS?

Any transportation project that would require some level of approval from Caltrans is considered a project on the SHS. These include projects that require an encroachment permit. Many projects that require an encroachment permit and many types of overcrossings would not likely lead to increases in VMT, and as such, those projects would not require a transportation impact analysis. Grade separations could result in increased VMT. To determine if a transportation impact analysis would be needed, first screen the project (for guidance on screening, see Section 5.1 of the TAC, posted on the Caltrans [SB 743 website](#)).

11) Why are responsibilities for performing different parts of the SB 743 implementation process assigned to different members of the Caltrans team as described in the timing memo?

Most implementation activities will be undertaken by Caltrans Project Development Teams (PDTs). However, Caltrans District Directors are assigned responsibility for approving a PDT decision that a VMT assessment is unnecessary in connection with re-initiation of a traffic study. This responsibility is assigned to the District Director to establish consistency of decision making.

12) How will models be selected for transportation impact analysis?

Guidance on this topic is provided in the *Draft Transportation Analysis Framework (TAF)* document, located on the Caltrans [SB 743 website](#). Training opportunities related to this question are forthcoming, as noted in the response to question 8.

13) How can existing programmatic plans and environmental documents be leveraged to support SB 743 implementation and compliance?

These questions are receiving additional attention and will be addressed in future materials. See question 16 in this document for related information.



14) What are the differences for analysis of transportation projects on the SHS if Caltrans designates another agency as Lead Agency?

The CEQA approach is the same if Caltrans designates another agency as Lead Agency.

15) VMT reduction will be difficult given the rural context of my project. How does Caltrans approach SB 743 implementation in my area of the State?

The Draft TISG, TAF, and TAC guidance documents include provisions specifically addressing projects in rural (non-MPO) counties. Discussion is ongoing about SB 743 implementation in rural areas within MPO counties. Stakeholder feedback on appropriate provisions in both contexts (rural counties and rural areas in MPO counties) is welcome.

16) Can local or regional transportation agencies pursue programmatic approaches to VMT reduction?

Programmatic approaches to VMT reduction are welcome and necessary to meet the State's climate goals. However, programmatic approaches to VMT reduction will not alter the obligation to evaluate VMT attributable to individual projects as part of the CEQA process. The ability to implement projects and strategies from approved Sustainable Communities Strategies as mitigation for significant VMT impacts identified in the CEQA process is presently under discussion. Stakeholder input is welcome on this point.

17) Will SB 743 implementation impact corridors that serve as important thoroughfares for trade and commerce?

Capacity-increasing projects on corridors that serve as important thoroughfares for trade and commerce may be impacted by SB 743 implementation. However, in the CEQA transportation impact analysis, only VMT from automobiles—on-road passenger vehicles, specifically cars and light trucks—is considered. Freight projects that add capacity to the SHS will be analyzed in order to assess whether they are likely to lead to increase in automobile trips.

More Q&A can be found on the [SB 743 Website](#)