Contract No. S22229

Equitable VMT Mitigation Program for Santa Clara County

Draft Program Framework

November 2024

Santa Clara Valley Transportation Authority

Solutions that move you

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SJ23-2220

Valley Transportation Authority

Solutions that move you

FEHR PEERS

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Key Definitions

Additionality: A policy outcome highlighted in the 2018 report Implementing *SB 743: An Analysis of Vehicle Miles Traveled Banking and Exchange Frameworks* and 2021 Caltrans *VMT Program Bulletin 21-01: VMT Mitigation Funding Status and Additionality* where a VMT mitigation program is required to achieve VMT reduction above and beyond what would have occurred in the program's absence.

Administering Agency: The agency responsible for managing the VMT mitigation program. The Administering Agency of a VMT exchange can be referred to as the VMT Exchange Agent, and the Administering Agency of a VMT bank can be referred to as a Bank Administrator.

California Environmental Quality Act (CEQA): CEQA was enacted in 1970 with the goal of providing public disclosure of the environmental impacts of a proposed action. Under CEQA, lead agencies must determine whether a proposed land use project has the potential to cause significant environmental impacts. This determination must be based, to the extent possible, on factual data and scientific methods of analysis. A land use project's effect on transportation is one of the 13 areas that must be analyzed.

Equitable Engagement Process: Engagement that includes listening to, understanding needs, and striving toward co-creation and shared ownership of a planning process with the community, particularly with historically underrepresented people. The project team strove to achieve this throughout all efforts, convening between phases to revisit engagement outcomes and adjust approaches for better alignment with an equitable engagement process. (Refer to **Appendix B**, Equity Framework, for specific details.)

Equity Priority Community (EPC): The Metropolitan Transportation Commission's Commission (MTC) population definition that incorporates race, income, language proficiency, age, access to a vehicle, household size, ability status, and rent-burden criteria in Santa Clara County.

Equitable VMT Reduction Strategy: A strategy to reduce VMT and improve travel options for all Santa Clara County residents and workers, with benefits focused on those living in communities with fewer resources. (Refer to **Appendix B**, Equity Framework, for specific details.)

Excess VMT: The VMT exceeding the desired VMT growth budget-the difference between the projected net increase in countywide VMT and the 'allowed' net increase in future development total VMT.

High VMT: A VMT rate that exceeds the VMT threshold. This report uses a VMT threshold of 15 percent below the existing total VMT per service population rate for Santa Clara County.

Implementing Agency: The entity responsible for directly implementing a VMT mitigation action for a proposed land use development.

Lead Agency: The local jurisdiction that has primary responsibility for leading the CEQA (or NEPA) environmental assessment process for a proposed project or plan.

Low VMT: A VMT rate that is less than the VMT threshold. This report uses a VMT threshold of 15 percent below the existing total VMT per service population rate for Santa Clara County.

Mitigation: Applying measures to avoid, minimize, remedy, reduce, or compensate for the adverse effects and environmental impacts resulting from projects or plans.

Mitigation Program: A collection of mitigation actions managed in a coordinated fashion.

Project: A land use project, such as a proposed development project that would generate VMT and may require mitigation of its VMT impacts.

Project Applicant: An entity, such as a public agency or private developer, sponsoring a land use project that would generate excess VMT and thereby potentially contribute funds toward a mitigation program.

Program Sponsor: An overarching reference to the agency overseeing administration and implementation of the VMT mitigation program with a range of responsibilities that may pertain to administrative, technical, and accounting elements.

Universal Street Design:[1] The creation of public streets and spaces that are accessible, safe, and usable for all people, regardless of age, ability, or mode of transportation. Key principles include centering accessibility, safety, inclusivity, connectivity, flexibility, and equity in the design process and outcomes for policies, plans, projects, and programs.

VMT Bank: A VMT bank would offer a pre-approved list of mitigation actions, which may include operational, programmatic, and capital improvements. The overall cost of mitigation actions would be divided by the total VMT reduction from these actions to determine the cost per VMT credit; this would be done by the Administering Agency (Bank Administrator). Project Applicants could purchase the credits needed to offset their VMT impact, allowing pooled funds from multiple land use projects to support a single mitigation action**.**

VMT Exchange: Like a VMT bank, a VMT exchange requires a pre-approved list of mitigation actions, which may include operational, programmatic, and capital improvements. Unlike a VMT bank, applicants must fully fund a mitigation action, meaning costs cannot be shared between applicants. A Project Applicant must fund one or more mitigation actions from the list, or else propose and fund a new action that meets the exchange's eligibility criteria. Because each mitigation action must be implemented in its entirety, an applicant may fund an amount of VMT reduction that exceeds their land use project's impact.

VMT-Based Impact Fee: A pre-determined fee that a Project Applicant pays toward the cost of a set of mitigation actions. The VMT reduction achievable by the program, and 'fair share' of that fee to be paid by each applicant is determined by a nexus study. The study establishes the nexus, or relationship, required by the Mitigation Fee Act between new development and the impact fee, and calculates the maximum, legally appropriate fee level (i.e., maximum defensible fee).

[1] See the National Association of City and Transportation Officials' documentation of universal street design elements for more details, available from nacto.org.

Vehicle Miles Traveled (VMT): A metric that accounts for the number of vehicle trips generated and the length or distance of those trips. This report uses the total VMT metric for specific geographic areas. Total VMT represents all vehicle trips (i.e., passenger and commercial vehicles) that occur within a specific geography (i.e., city or county) on a typical weekday.

VMT Mitigation Action: A project or program, such as a transit service expansion or a bike lane installation, which reduces VMT and that can be used for mitigation purposes.

VMT Mitigation Action Review Team: An entity charged with providing third-party oversight of the VMT mitigation action selection and evaluation process and overall program evaluation. This multidisciplinary group could be housed within the Program Sponsor or operate independently.

VMT Mitigation Program Framework: An approach and strategy that presents a comprehensive view of the type of VMT reduction measures to be included in the VMT mitigation program, the VMT mitigation process, the roles and responsibilities of an Administering Agency, program implementation steps and timelines, and considerations and recommendations for incorporation into program specifications.

VMT Reduction Projects: Capital projects or operational programs that reduce VMT and may be considered for development into VMT mitigation actions for inclusion in the program.

VMT Reduction Category: The term for VMT reduction projects that involve the same type of capital improvement or operational program, such as public transportation or transportation demand management (TDM) measures. Each category has a range of expected VMT reduction potential based on known mechanisms.

Executive Summary

The Santa Clara Valley Transportation Authority (VTA) is leading one of the first local efforts in the state to develop a framework for an equity-centered countywide vehicle miles traveled (VMT)[2] mitigation program. This program, known as the Equitable VMT Mitigation Program for Santa Clara County, intends to reduce driving and expand travel options for Santa Clara County residents in a way that works across jurisdictional lines and improves outcomes for communities that need it most. To effectively deliver this work and incorporate equity considerations, this effort was conducted in partnership with the California Department of Transportation (Caltrans), San José State University (SJSU), the Mineta Transportation Institute (MTI), and local agency partners. This framework is the initial step in program development.

This framework offers considerations and recommendations for (1) types of VMT reduction projects that could be funded by a program, (2) the structure of a program, and (3) who would sponsor a program, along with other elements. The detailed specifications for a program would be determined in a potential future implementation phase, based on input from staff and legal counsel of the VMT mitigation Program Sponsor and the participating local jurisdictions.

The three key parts of this framework were fundamentally shaped by engagement with community and/or agency partners: (1) the implementation feasibility and efficacy considerations for the three VMT reduction project types; (2) the recommendation that the program start as a VMT exchange and evolve into a VMT bank; and (3) and the recommendation that VTA serve as Program Sponsor. All input from community engagement is categorized as feedback, considerations, and recommendations, as defined below:

- **Feedback** is what the project team heard from the community and stakeholders, including the general public, community organizations, and local jurisdiction staff.
- **Considerations** focus on feedback from the engagement process and its potential impact on the types of VMT reduction projects delivered by the program and who benefits most from them as well as the program structure and sponsor.
- **Recommendations** are limited to specific components of the VMT mitigation program framework (such as program structure and sponsor), and actions for the Program Sponsor and/or lead agencies to establish in an implementation phase.

Background

New development projects, like housing or office buildings, can lead to an increase in the number of miles driven in an area. State environmental law requires local jurisdictions to work

[2] VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. This report uses the total VMT metric for specific geographic areas. Total VMT represents all vehicle trips (i.e., passenger and commercial vehicles) that occur within a specific geography (i.e., city or county) on a typical weekday.

with developers to reduce the extra driving generated by a development (mitigate excess VMT) if it is projected to be above a threshold. Each Lead Agency has the discretion and responsibility to set significance thresholds for each California Environmental Quality Act (CEQA) topic area including transportation. Local jurisdictions throughout Santa Clara County have adopted VMT thresholds or use recommendations from the Governor's Office of Planning and Research (OPR) to define what constitutes an impact for land use and transportation projects in accordance with Senate Bill (SB) 743. Once a land use project has been found to cause a significant impact, CEQA requires the Project Applicant to mitigate that impact to the fullest extent feasible.

Mitigating VMT can be challenging when limited to the individual land use project level and measures that can be implemented on or near a development site. Effective VMT reduction measures are best applied on a large scale, as described in **Chapter 1**. A VMT mitigation program could provide more mitigation options that offer economies of scale and work across jurisdictional boundaries, to help reduce the extra driving and expand travel choices.

In 2022, VTA received a Caltrans planning grant to develop the framework for an Equitable VMT Mitigation Program for Santa Clara County. This framework explores ways to take on this challenge of mitigating VMT impacts through a countywide program, focusing on maximizing equity outcomes from new land development projects that generate VMT. It does not address VMT generated from transportation projects nor how VMT impact significance is determined, as that is beyond the framework's scope.

Project Process

This framework was developed by a project team comprised of community engagement, transportation, economic analysis, and environmental planning practitioners from several consulting firms; and staff from two local partner Community-Based Organizations (CBOs). The project team brought their understanding of CEQA practice as well as the land use and transportation context of Santa Clara County to this effort and were informed by community feedback provided at in-person and virtual events.

Local jurisdiction staff contributed input through a Technical Advisory Group (TAG), while representatives of community-based organizations offered insights into community needs and challenges. Researchers and students from San José State University (SJSU) and the Mineta Transportation Institute (MTI) conducted literature reviews, spatial analysis, stakeholder interviews, and equity approach review. VTA staff guided the project and participated in most community and stakeholder engagement activities.

The project began in June 2023 and is expected to conclude in early 2025. Early on, the project team developed an Equity Framework, summarized local VMT mitigation practices and needs, and developed an Equitable Engagement Plan. Shortly thereafter, the team conducted three successive phases of community engagement: (1) the first phase in Fall 2023 focused on collecting broad and diverse input, (2) the second phase in Spring 2024 filtered and refined this

input; and (3) the third phase in Fall 2024 confirmed the program framework and recommendations.

Collectively, community and stakeholder engagement included the following:

- More than a dozen in-person events
- More than 25 online events and meetings
- 20 stakeholder interviews
- Presentations at 15 meetings of VTA Board Committees (hybrid in-person and online)
- A community survey and a survey of local jurisdiction staff
- Publication of explanatory videos and a project Fact Sheet

Materials were provided in English, Spanish, Vietnamese, and Chinese at all community events, with real-time interpretation provided in key instances. More than 1,000 people from areas across Santa Clara County were engaged via these efforts.

Example VMT Mitigation Actions

An essential component of a future VMT Mitigation Program is identifying mitigation actions that align with community values and promote equity. The project team piloted a process for selecting VMT mitigation actions, and the outcomes of this process were shared with the community during Phase 2: Filter and Refine engagement. This selection process balances various technical and practical considerations, as presented in **Figure ES-1**. The actions identified serve as a foundation for potential implementation, which may include some or all of these actions, or additional ones identified through the process outlined here.

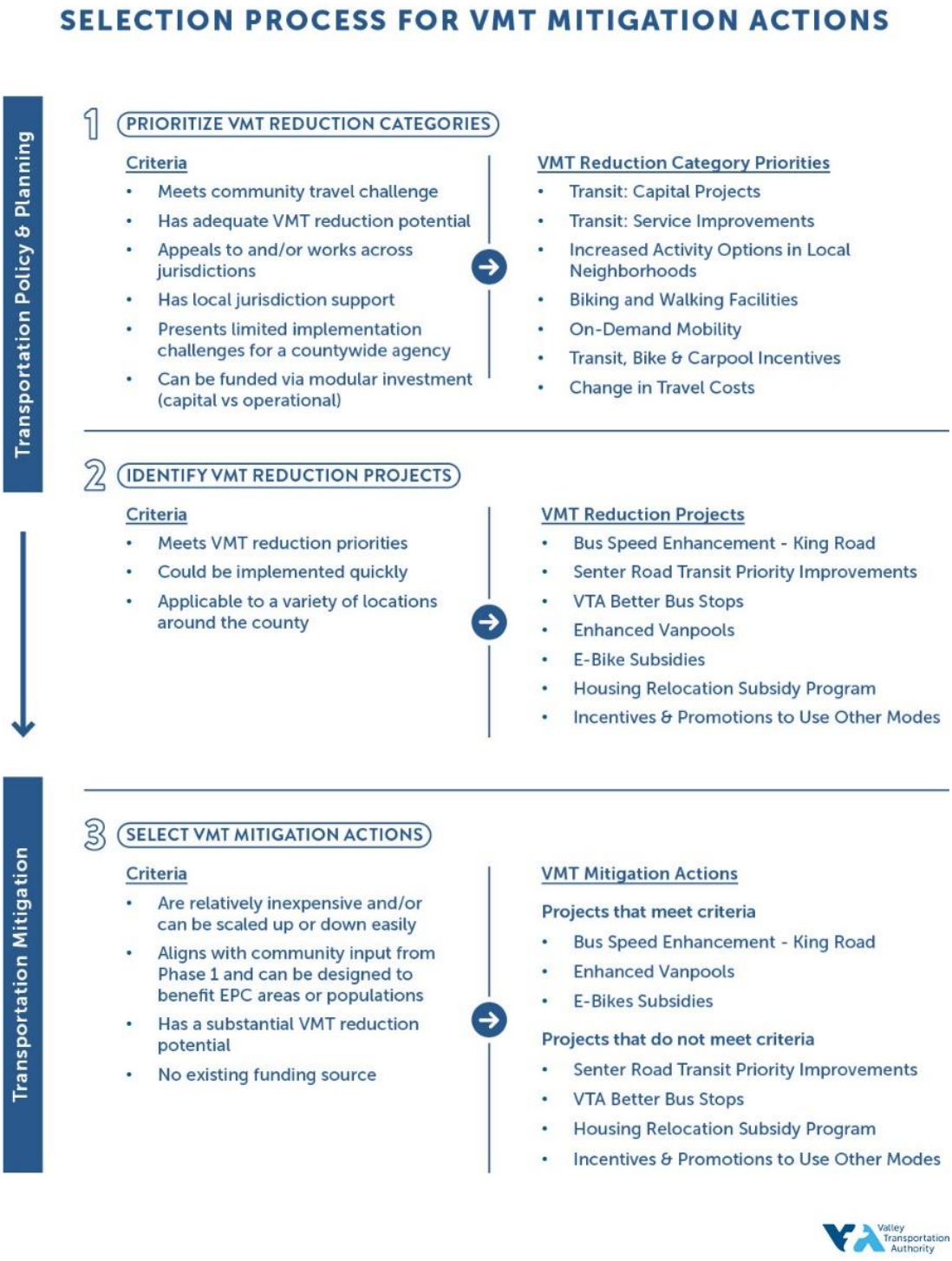


Figure ES-1: VMT Mitigation Action Prioritization Scheme

The selection process for VMT mitigation actions resulted in categories of potential VMT mitigation project types which were refined and used to develop VMT mitigation actions presented to the community (refer to **Chapter 4** for more detail). Feedback from the community highlighted interest in the following:

- **Transit services that are faster and more reliable:** Because of the need to implement projects quickly and deal with unpredictable funding streams, it is not advisable to use funds from the initial mitigation program to establish and operate new transit services. However, those funds could be used to improve the user experience along existing transit routes (improved speed, reliability, and safety, lighting, shelters, larger platforms, restrooms, landscaping), and/or to provide free or subsidized transit passes.
    - This led to a focus on **transit speed and reliability improvements**, such as **bus speed improvements on corridors around the county** which could include the installation of bus boarding islands and/or side-running dedicated bus lanes.
- **Better pedestrian and bike facilities:** It can take several years to design and construct a new dedicated physically separated bicycle path (versus painting a bike lane) and research indicates bicycle infrastructure investments tend to be relatively expensive on a per-VMT-reduced basis. So, new bike infrastructure may not be the best choice for the initial VMT mitigation program. However, other ways to encourage more bicycling aside from building new infrastructure could be cost effective and faster to implement.
    - This led to a focus on **financial incentives for bicycle use, such as e-bike subsidies** to reduce the cost of purchasing personal e-bikes for Santa Clara County residents.
- **More information about transit and micromobility services and incentives and reducing the overall cost of travel:** Strategies related to financial incentives and better traveler information tend to fall under the general umbrella of TDM. There are various TDM programs throughout the county, so the VMT mitigation program needs to identify and fill gaps in current services to meet the “additionality test.”
    - This led to a consideration of gaps in transit service and TDM, such as an **enhanced vanpool program for workers not included in existing employer ride-matching or vanpool programs**, particularly shift and service workers.

During discussions about example VMT mitigation actions, community members, VTA, and local jurisdiction staff proposed a series of additional supportive actions identified as desirable, if not essential, to enhance the effectiveness of the example VMT mitigation actions. Supportive actions would involve implementing separate projects designed to complement the VMT mitigation efforts. It is suggested that in the future, supportive actions be considered for inclusion as VMT mitigation actions or else get funded through other sources.

Feedback also identified several considerations that apply categorically to financial incentives, capital projects, and services. The project team suggests the Program Sponsor review these considerations and incorporate at least some into mitigation actions to maximize program value to EPC areas and populations.

Recommended Program Structure and Sponsor

The framework presents the recommended program structure, including legal considerations, statutory requirements for the VMT mitigation program, and implementation guidance for the Program Sponsor (refer to **Chapter 5** for more detail). While the statutory requirements of a VMT mitigation program are well established, the administrative and governance requirements are less well defined and have greater flexibility for implementation. Recommendations are based on working knowledge of regional VMT mitigation programs as well as community and stakeholder input.

There are three primary areas of focus for considerations and recommendations: (1) VMT mitigation actions that could be funded by a program; (2) program structure; and (3) Program Sponsor. Detailed specifications would be determined in a potential future implementation phase of the VMT mitigation program.

VMT Mitigation Action Categories

The example VMT mitigation actions identified in this program framework fall into three VMT mitigation action categories, and it is anticipated that several future projects included in this program will fall into these same three categories:

- **Financial Incentives:** Programmatic actions that would establish or expand VMT reduction programs, which could include TDM measures such as the provision of discounted or free transit passes and funding incentive programs that encourage the use of carpooling, active transportation, and transit. Example action: e-bike subsidies.
- **Capital Projects:** Physical improvements to the transportation network that reduce VMT, including pedestrian, bicycle, and transit infrastructure projects, such as bike lanes and bus lanes, or land use-related mitigation actions such as infill affordable housing. Example action: transit speed improvements.
- **Services:** These types of improvements provide ongoing services that encourage people to use modes other than single-occupancy vehicles. These can include increases in the frequency or service hours of transit routes, the expansion of transit into formerly unserved areas, and the provision of carshare, bikeshare, carpooling, and micromobility programs. Example action: enhanced vanpools and/or an on-demand shuttle service.

Feedback received during Phase 2: Filter and Refine engagement identified several considerations that apply categorically. Incorporating at least some of these considerations into mitigation actions would help to maximize their value to EPC areas and populations.

Program Structure

A VMT mitigation program can be structured in several ways, depending on the types of actions funded and administrative preferences. The project team evaluated the following three structures:

- **VMT Bank:** A VMT bank would offer a pre-approved list of mitigation actions, which may include operational, programmatic, and capital improvements. The overall cost of mitigation actions would be divided by the total VMT reduction from these actions to determine a cost per VMT credit; this would be done by the Administering Agency (Bank Administrator). Project Applicants could purchase the credits needed to offset their VMT impact, allowing pooled funds from multiple projects to support a single mitigation action.
- **VMT Exchange:** Like a VMT bank, a VMT exchange requires a pre-approved list of mitigation actions, which may include operational, programmatic, and capital improvements. Unlike a VMT bank, applicants must fully fund a mitigation action, meaning costs cannot be shared among applicants. A Project Applicant must fund one or more mitigation actions or else propose and fund a new action that meets the exchange's eligibility criteria. Because each mitigation action must be implemented in its entirety, an applicant may fund an amount of VMT reduction that exceeds their project's impact.
- **VMT-Based Impact Fee:** A pre-determined fee that a Project Applicant pays toward the cost of a set of mitigation actions. The VMT reduction achievable by the program, and 'fair share' of that fee to be paid by each applicant, is determined by a nexus study. The study establishes the nexus, or relationship, required by the Mitigation Fee Act between new development and the impact fee, and calculates the maximum, legally appropriate fee level (i.e., maximum defensible fee).

Stakeholder feedback emphasized the need for the program to be compelling and demonstrate proof-of-concept quickly, favoring a flexible structure with limited start-up costs to allow rapid implementation. Preference was also given to a structure that could accommodate a wide range of VMT mitigation action types. While a VMT exchange may be easier to establish, stakeholders expressed concerns about applicants needing to fund entire mitigation projects and prioritizing use of the most cost-effective measures first. A VMT bank was viewed as offering greater flexibility in choosing which actions to implement and when.

Some stakeholders expressed a desire for the program to complement local VMT mitigation funding programs and funding options, ensuring that some funds are spent near the site or in the jurisdiction where the VMT impact occurs. Both structures can achieve this, but a VMT bank offers a more intuitive process for allocating funds among projects in different locations. The ability of the three example VMT mitigation actions—particularly E-Bike Subsidies and Enhanced Vanpools—to serve most areas of the county may reduce the necessity for a policy that directs funding specifically to the location of the VMT impact. However, this will be an important area to explore further in a potential implementation phase. Ultimately, project team and stakeholder consensus was that a mitigation program should be established initially in the form of a VMT exchange, and potentially evolve to a VMT bank.

This is the formal recommendation of this program framework. A VMT exchange requires administrative decisions and considerations presented in **Figure ES-2. Figure ES-3** presents several options for administrative specifications, presented as questions. A VMT bank requires a separate series of specifications and administrative decisions and considerations.

VMT Exchange

Implementation

Step 1
Determine Scale/Scope

To create a regional program requires all participating agencies to adopt the program. Programs with larger scopes can:

*Decrease administrative costs
*Decrease local authority
*Increase efficiency and effectiveness of the program

Step 2
Determine Sponsor

The organizational components of a mitigation exchange will depend on the type of sponsor (public or private) mitigation options, and matching process between mitigation options and projects.

Step 3
Determine & Propose Mitigation Options

If the sponsor is a public agency, they will develop a list of options developers can choose from to mitigate the VMT generated by their development.

If the developer wants to propose their own mitigation exchange, they must get it approved by the sponsor and lead agency.

Step 4
Develop Review Team

The Exchange should have a Review Team to verify mitigation effectiveness and additionality based on substantial evidence. The team could consist of third-party representatives. The team reviews the mitigation list and verifies that the options reduce VMT and that the reductions would not have occurred without the project, program, or incentive.

Because exchanges can include programs/incentives as mitigation options, the Review Team must continually evaluate them to ensure the options are still effective and determine to what degree they reduce VMT.

Step 5
Administer Exchange

The public agency/entity sponsoring an Exchange may not always be the lead agency on a project. In this situation the Sponsor should develop an agreement with the lead agency that allows the exchange's mitigation options to be considered an acceptable mitigation measure for the EIR.

Exchanges must continue to prove that their mitigation options reduce VMT and that the reduction would not have occurred without the projects/programs.

CEQA review of the exchange creation may be required to be considered as a formal mitigation program.

Procedural Flowchart

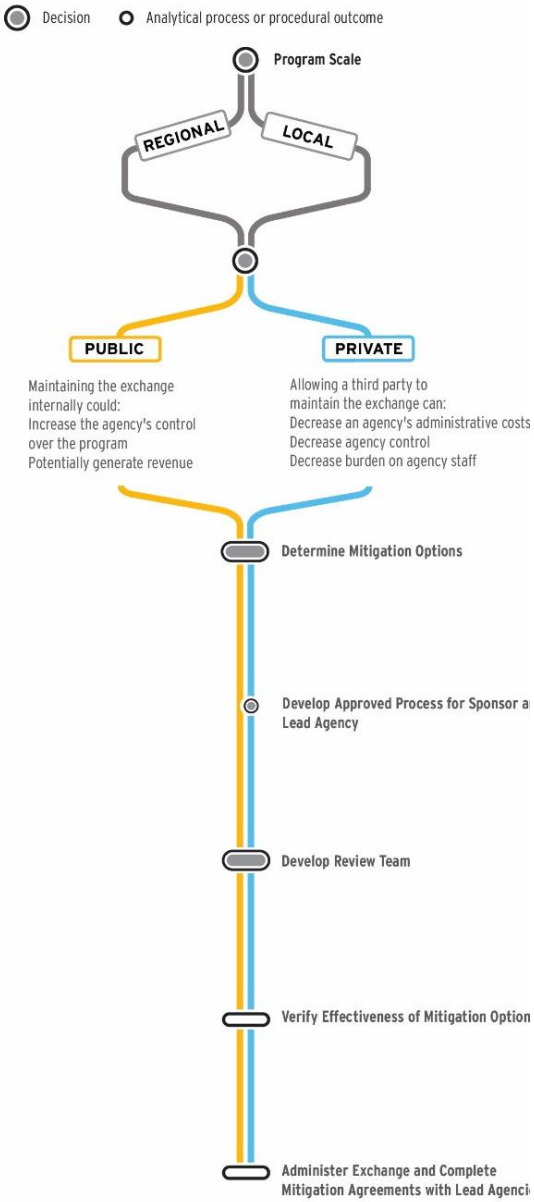


Figure ES-2: VMT Exchange Implementation Flow Chart

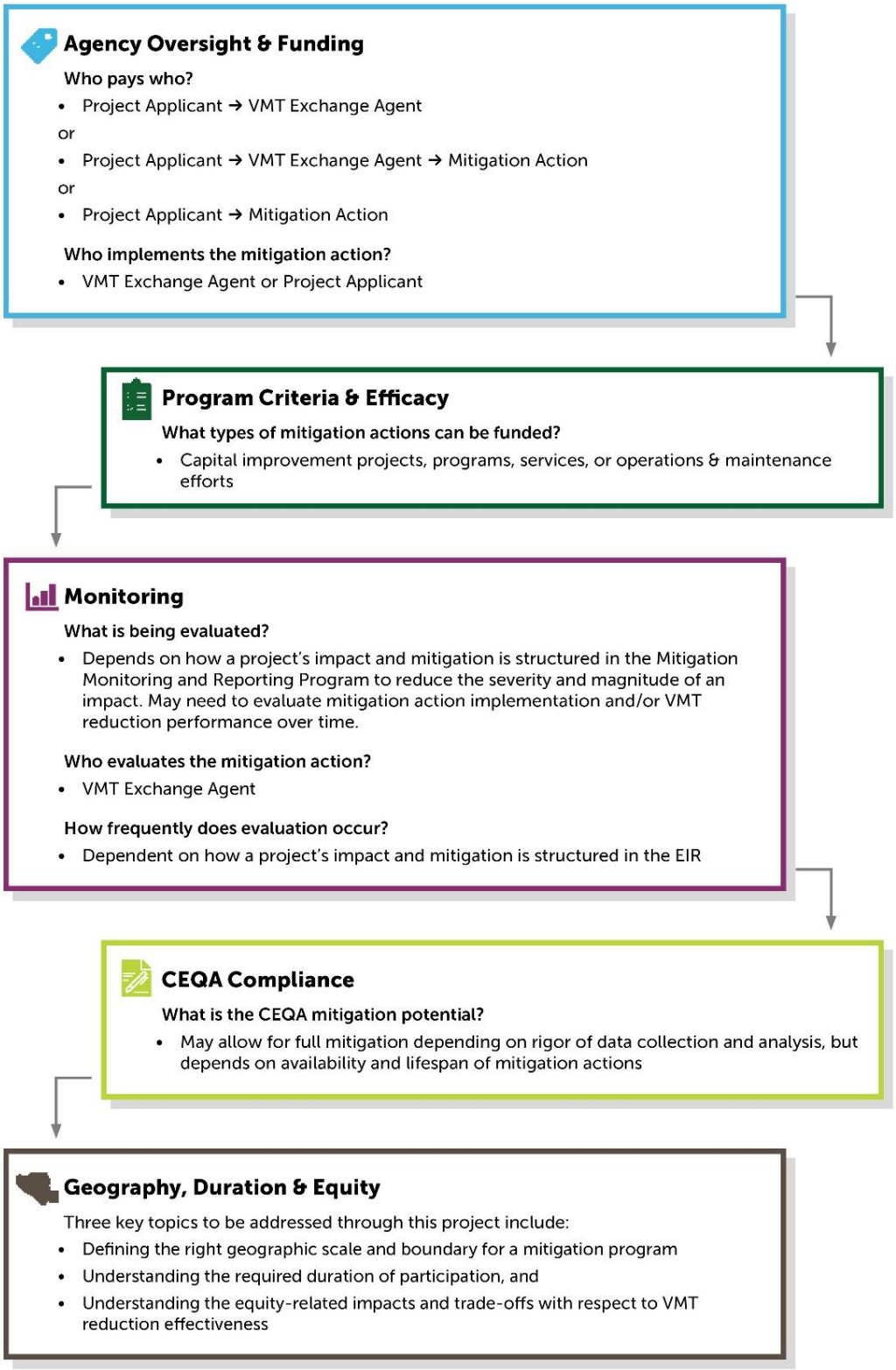


Figure ES-3: VMT Exchange Administration Questions

Program Sponsor

The project team also asked participants at the VTA staff workshop and local jurisdiction staff workshops to offer input on the Program Sponsor. Participants were prompted to rank four Program Sponsor options—VTA, a Joint Powers Board, a new agency, or a private agency—from most to least desirable and provided input on their rationale. Feedback demonstrated overwhelming support from VTA staff and local jurisdiction staff for VTA to serve as the sponsor of a potential future program. This support is based on VTA's role and perspective on countywide needs, and existing apparatus role and organizational structure for distributing funds and administering transportation projects countywide. Stakeholder input recognized that guardrails would be required to ensure proper program administration of funds and alignment of outcomes with Equity Framework performance metrics.

Implementation Roles, Responsibilities, and Timeframe

As program specifications are developed during a potential implementation phase, the Administering Agency's roles and responsibilities must be defined. Key areas of focus are outlined in **Table ES-1.**

Table ES-1: Roles for the Mitigation Program Administrator

Area of Focus	Responsibilities
Administrative	• Business operations, including tracking the cost of administering the program and ensuring VMT mitigation funds help defray these costs • Compile and periodically update mitigation program documents • Coordinate with development applicants and partner firms
Technical	• Calculate VMT mitigation action costs and VMT reduction effectiveness • Verify applications to fund mitigation actions • Monitor and report on program • Monitor and report project mitigation action implementation and effectiveness toward program performance metrics
Accounting	• Receive, aggregate, and disperse funds • Track payments • Ensure all legal guidelines and CEQA requirements applicable to its role are met

Source: Fehr & Peers, 2024.

Full specifications for a potential VMT mitigation program are yet to be defined, but it is possible to identify several anticipated steps for program operation. These steps, detailed in **Table ES-2** in order of implementation, include considerations for both VMT exchange and VMT bank implementation. The groundwork for these steps has been laid in this framework, so a future implementation phase can build on this planning effort.

Table ES-2: VMT Mitigation Program Operation Process

Step	Description
Program Initiation	• Program Sponsor allocates funding and receives any necessary approvals to form the mitigation program. This step includes evaluating and accounting for ongoing administrative costs. • Program Sponsor develops a governing document that outlines and formalizes the process and procedures the program would adhere to. • Operating or purchase agreements between participating agencies and the Program Sponsor are established.
Mitigation Action List Development	• Administering Agency, in consultation with any partner agencies, develops a list of mitigation actions to include in the initial program. This work would be performed and/or overseen by the VMT Mitigation Action Review Team. This work should include a range of mitigation actions anticipated to meet the demand of small, mid-sized, and large development projects in the County.
Quantify Reductions and Costs	• Administering Agency estimates the cost and VMT reduction potential of mitigation actions. Costs incorporated into this evaluation include capital and administrative costs for the action as well as compensation for anticipated CBO or third-party implementation partners. • Participating agencies submit documentation of project/program details.
VMT Impact and Reduction Needs Identified	• Lead agencies and/or developers through the CEQA process identify VMT impacts and the amount of VMT reduction needed through the CEQA process. • Lead Agency delivering or approving the land use project with VMT impacts contacts Administering Agency.
Mitigation Action Assigned to Impact	• Administering Agency matches mitigation reduction needed to offset identified VMT impact with available mitigation action(s) (i.e., determines its fair share of mitigation required and the mitigation action(s) adequate to meet the need) • Lead Agency and/or developer makes financial contribution to the Administering Agency. • Mitigation action(s), or consumed portions thereof, are removed from program list. In the case of a VMT bank, this is the removal of credits from the register.
Implementation of VMT Reducing Mitigation	• Administering Agency works with the Implementing Agency to fund, oversee, and coordinate the implementation of the VMT mitigation action(s). • Alternatively, if implementation by a partner agency or the Project Applicant is an option, the Administering Agency provides funds to the partner agency or confirms delivery by the applicant to implement the VMT mitigation action(s).
Additionality Verification	• The Administering Agency verifies that the mitigation action(s) meet the additionality test, and that the calculations and assumptions for the costs and VMT reduction potential are clearly documented and consistently applied.
Monitoring and Reporting	• Administering Agency collects information on mitigation action delivery effectiveness. • Administering Agency periodically updates public-facing document summarizing the outcome of monitoring and reporting.
Mitigation List Updated	• Administering Agency periodically updates the mitigation action list, using the latest information available including data collected during monitoring. • The process for updating the list mirrors the selection process for VMT mitigation actions in the program. This work would be performed and/or overseen by the VMT mitigation program action review ream.

Source: Fehr & Peers, 2024.

Conclusion and Near-Term

Over the course of developing this Equitable VMT Mitigation Program Framework the project team, in partnership with VTA and its local jurisdictions, laid the groundwork for a countywide VMT mitigation program in Santa Clara County. This report represents the initial step in the effort to develop an Equitable VMT Mitigation Program for Santa Clara County, providing a foundation that VTA and interested local jurisdictions can build on to pursue an implementation phase and initiate a program. Anticipated near-term steps building on this work include:

- VTA staff bring the Equitable VMT Mitigation Program report to VTA Committees and the VTA Board in early 2025, to review and potentially accept the framework.
- VTA and local jurisdiction staff scope an implementation phase via continued working meetings with technical staff and initial discussions with legal counsel. A key consideration will be how to fund an implementation phase, and what, if any, commitment would be involved when a local jurisdiction participates in the implementation phase.
- Solicit interest from local jurisdictions on whether to opt in to an implementation phase which would focus on determining program details and developing agreements between local jurisdictions and the Program Sponsor.
- Establish a VMT Mitigation Action Review Team to help administer and monitor the program.

At the conclusion of the implementation phase, an initial or pilot VMT mitigation program would be ready to launch. With thoughtful planning and the integration of the considerations and recommendations outlined in this framework, this program has the potential to achieve significant outcomes for Santa Clara County:

- Provide local jurisdictions with another option for reducing VMT from land development projects, helping with environmental review and local housing and job production goals
- Streamline the environmental review process for developers, reducing uncertainty and saving time and money
- Provide transportation improvements targeted toward lower-income households and other members of equity communities, helping them get to work, school, shops, and other places they need to go
- Provide more transportation options for all community members and reduce overall driving, noise pollution, and pedestrian and bicyclist exposure to car crashes
- Improve the environment in general because reducing the amount of driving helps reduce Greenhouse Gas Emissions, improve local air quality, and meet state climate goals.

Chapter 1: Introduction

The Santa Clara Valley Transportation Authority (VTA) is leading one of the first local efforts in the state to develop a framework for an equity-centered countywide vehicle miles traveled (VMT)[3] mitigation program. This program, known as the Equitable VMT Mitigation Program for Santa Clara County, intends to reduce driving and expand travel options for Santa Clara County residents in a way that works across jurisdictional lines and improves outcomes for communities that need it most. To effectively deliver this work and incorporate equity considerations, this effort was conducted in partnership with the California Department of Transportation (Caltrans), San José State University (SJSU), the Mineta Transportation Institute (MTI), and local agency partners. This framework is the initial step in program development.

This framework offers considerations and recommendations for (1) types of VMT reduction projects that could be funded by a program, (2) the structure of a program, and (3) who would sponsor a program, along with other elements. The detailed specifications for a program would be determined in a potential future implementation phase, based on input from staff and legal counsel of the VMT mitigation Program Sponsor and the participating local jurisdictions.

The three key parts of this framework were fundamentally shaped by engagement with community and/or agency partners: (1) the implementation feasibility and efficacy considerations for the three VMT reduction project types; (2) the recommendation that the program start as a VMT exchange and evolve into a VMT bank; and (3) and the recommendation that VTA serve as Program Sponsor. All input from community engagement is categorized as feedback, considerations, and recommendations, as defined below:

- **Feedback** is what the project team heard from the community and stakeholders, including the general public, community organizations, and local jurisdiction staff.
- **Considerations** focus on feedback from the engagement process and its potential impact on the types of VMT reduction projects delivered by the program and who benefits most from them, as well as the program structure and sponsor.
- **Recommendations** are limited to specific components of the VMT mitigation program framework (such as program structure and sponsor), and actions for the Program Sponsor and/or lead agencies to establish in an implementation phase.

1.1 Report Organization

This report presents VMT Mitigation Program content in a progressively more detailed manner. Specific sections are oriented to the following readers:

[3] VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. This report uses the total VMT metric for specific geographic areas. Total VMT represents all vehicle trips (i.e., passenger and commercial vehicles) that occur within a specific geography (i.e., city or county) on a typical weekday.

- **Executive Summary**: Summarizes engagement efforts and outcomes, VMT mitigation action selection procedures, and key considerations and recommendations for the VMT mitigation program. Accessible to all interested audiences.
- **Body of the Report**: Summarizes the methods and findings for local jurisdictions that would serve as a Lead Agency that could benefit from this VMT mitigation program. Accessible to local jurisdiction staff, decision makers, and interested community members.
- **Appendices**: Summarizes in greater detail the methods and findings, and substantial evidence for local jurisdictions that would serve as a Lead Agency. Accessible to implementers, and those who want to know more.

This report is organized into five chapters which mirror the planning process undertaken to develop the framework for the Equitable VMT Mitigation Program. These chapters are described as follows:

Chapter 1: Introduction. Describes how VMT is used to identify environmental impacts and how those impacts are mitigated. This chapter also presents the project's Equity Framework and VMT mitigation program options under consideration. This chapter concludes with a summary of the range of VMT mitigation programs under development, statewide, that serve as precedent and peer examples for the Equitable VMT Mitigation Program for Santa Clara County.

Chapter 2: Local Mitigation Practices and Needs, and Statewide Practices. Provides a summary of the VMT mitigation practices and needs expressed by jurisdictions within Santa Clara County. This chapter then presents the magnitude of VMT impacts that could occur within Santa Clara County over a given period and the magnitude of VMT reductions needed to mitigate those impacts. Community travel needs, challenges, and preferences collected from focus groups and a community travel survey are summarized in this chapter.

Chapter 3: Community and Stakeholder Engagement and Consensus Building. Provides a summary of the multi-phased community engagement for this project. The chapter presents the engagement team and the Technical Advisory Group, defines engagement performance metrics, and details what consensus building activities occurred.

Chapter 4: VMT Mitigation Action Selection Feedback and Considerations. Summarizes the process used to identify example VMT reduction projects and iteratively winnow down that list to select VMT mitigation actions to include in the program framework. This is followed by a summary of VMT reduction quantification and cost analysis for the VMT mitigation actions. The chapter presents how a VMT Mitigation Action Review Team would conduct this work in the future as well as ongoing evaluation of progress toward program objectives. The chapter concludes with an MTI/SJSU evaluation of the Equity Framework employed by the project and a discussion of additional supportive actions, and equity considerations for VMT mitigation action selection.

Chapter 5: VMT Mitigation Program Structure, Justification, and Administration. Provides a summary of the VMT mitigation program options and considerations for alignment with program

priorities. This is followed by a proposed near-term and long-term program structure which reflects conclusions from discussions with VTA, community feedback, and stakeholder input. The chapter closes with program structure and implementation recommendations and a detailed summary of the program's legal basis and justification.

Appendices. Provides additional supporting material referenced throughout the chapters. In most cases, the appendices contain the interim technical deliverables and engagement materials used during the project.

1.2 Study Background

New land use projects, like housing or office buildings, can lead to an increase in the number of miles driven in an area. State environmental law requires local jurisdictions to work with developers to reduce the extra driving generated by a development (mitigate excess VMT) if it is projected to be above a threshold. Each Lead Agency has the discretion and responsibility to set significance thresholds for each California Environmental Quality Act (CEQA) topic area including transportation. Local jurisdictions throughout Santa Clara County have adopted VMT thresholds or use recommendations from the Governor's Office of Planning and Research (OPR) to define what constitutes an impact for land use and transportation projects in accordance with Senate Bill (SB) 743. Once a land use project has been found to cause a significant impact, CEQA requires the Project Applicant to mitigate that impact to the fullest extent feasible.

Mitigating VMT can be challenging when limited to the individual land use project level and measures that can be implemented on or near a development site. Effective VMT reduction measures are best applied on a large scale. A VMT mitigation program could provide more mitigation options that offer economies of scale and work across jurisdictional boundaries, to help reduce the extra driving and expand travel choices.

In 2022, VTA received a Caltrans planning grant to develop the framework for an Equitable VMT Mitigation Program for Santa Clara County. This framework explores ways to take on this challenge of mitigating VMT impacts through a countywide program, focusing on maximizing equity outcomes from new land use projects that generate VMT. It does not address VMT generated from transportation projects nor how VMT impact significance is determined, as that is beyond the framework's scope.

1.2.1 Purpose of California's Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law and started a process that has fundamentally changed transportation impact analysis as part of CEQA compliance. Specifically, the legislation directed the Governor's Office of Planning and Research (OPR) to look at different metrics for identifying transportation impacts and make corresponding revisions to the *CEQA Statute & Guidelines*. The initial bill included two legislative intent statements (emphasis added):

- **New methodologies** under CEQA 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.
- 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 emissions**.

To encourage this shift, transportation impacts are now determined based on VMT, rather than level of service (LOS) or other measures of traffic congestion. By using VMT as a metric to determine transportation impacts, development is encouraged in places where trips are short. The close proximity of destinations in these places makes walking, bicycling, and transit viable and competitive with driving. As population and employment growth are attracted to these places, the net effect over time is to reduce per-capita VMT and its adverse effects on the environment.

1.2.2 How CEQA VMT Mitigation Works Today

CEQA was enacted in 1970 with the goal of providing a mechanism for disclosing to the public the environmental impacts of proposed actions. Before taking discretionary action, lead agencies must determine if that action is subject to CEQA and conduct a review of the effects of that action on the physical environment. The State OPR prepares and maintains guidelines to help agencies implement CEQA.

Under CEQA, lead agencies must determine whether a proposed land use project has the potential to cause significant environmental impacts. This determination must be based, to the extent possible, on factual data and scientific methods of analysis. A project's effect on transportation is one of the 13 areas that must be analyzed.

The use of VMT as a metric focuses on the total *amount* of driving, rather than the driving *experience.* This new view presents an impact filter intended to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. VMT can help identify how projects (land development and infrastructure) influence accessibility (to places and people), noise, and emissions; thus, its selection as a metric is aligned with the objectives of SB 743.

Today, if a land use project causes a significant VMT impact it is required to mitigate that impact to the fullest extent feasible. Currently, the avenues and strategies available for reducing VMT from an individual land use project are very limited. Most VMT mitigation strategies available today are limited to actions implemented on-site, meaning those that happen at an individual building or group of buildings. Such actions are geographically limited and highly dependent on who will occupy project buildings (a fact that may not be known at the outset of a land use project and that may change throughout a project's lifespan). The effectiveness of VMT mitigation strategies is therefore constrained and difficult to predict confidently.

On-site VMT mitigation strategies are most effective when implemented in a policy environment that encourages efficient land use and infrastructure investments that support transit use, biking, and walking. Strategies well-suited to on-site VMT mitigation (such as marketing programs for transit or other non-drive-alone modes) and/or the installation of bicycle parking tend to be less effective dollar-for-dollar than similar investments made at the community scale. In contrast, some of the most effective VMT reduction measures are best applied on a large geographic scale (city, county, or region).

1.2.3 VTA's County Transportation Authority Role

VTA is an independent special district that provides sustainable, accessible, community-focused transportation options that are innovative, environmentally responsible, and promote the vitality of our region. VTA provides bus, light rail, and paratransit services, and participates as a funding partner in regional rail service including Caltrain, Capitol Corridor, and the Altamont Corridor Express.

VTA provides these services throughout Santa Clara County, including Campbell, Cupertino, Gilroy, Los Altos, Los Altos Hills, Los Gatos, Milpitas, Monte Sereno, Morgan Hill, Mountain View, Palo Alto, San José, Santa Clara, Saratoga, Sunnyvale, and unincorporated county areas. VTA continually builds partnerships to deliver transportation solutions that meet the evolving mobility needs of Santa Clara County.

While many people know VTA for providing transit services, VTA fulfills additional roles as a countywide transportation authority as noted below.

1.1.1.1 Countywide Transportation Planning

VTA is responsible for countywide transportation planning in Santa Clara County, including congestion management, design and construction of specific highway, pedestrian, and bicycle improvement projects, as well as promotion of transit-oriented development.

1.1.1.2 Assisting with Transportation Analysis of Land Use Projects

VTA works with its 16 local jurisdictions to provide technical assistance and promote consistency in the way transportation analysis of land use projects is performed. For more than 30 years, VTA has maintained Transportation Impact Analysis (TIA) Guidelines which provide procedures for local jurisdictions to use as part of their evaluation of land use projects. More recently, following the adoption of SB 743, VTA has been actively involved in providing resources and technical assistance to local jurisdictions on VMT analysis. This has included providing estimates of base VMT from the VTA travel demand model, developing a web-based Santa Clara Countywide VMT Evaluation Tool, and meeting with local jurisdictions through a working group and one-on-one meetings.

1.2.4 How to Expand CEQA VMT Mitigation Options

VTA is developing a framework for an Equitable VMT Mitigation Program for Santa Clara County that would expand the VMT mitigation options available to projects. The program would broaden and scale up mitigation options beyond individual land use project sites to a countywide level, directing VMT mitigation funds toward more effective off-site strategies and leveraging economies of scale for implementing VMT-reducing actions across the county.

A countywide program approach to VMT mitigation would address current limitations by creating opportunities for more effective off-site VMT mitigation strategies that can scale from implementation at the neighborhood level to city or county level. VMT reduction strategies may take the form of non-vehicle infrastructure improvements, programs, and services that expand options for how people travel around the county, or housing subsidy programs designed to reduce VMT. The VMT mitigation program may ultimately take the form of a VMT-based impact fee, VMT exchange, or VMT bank, each of which has different administrative and funding options.

1.2.5 Project Approach

This study required the translation of complex technical topics into clear and easily digestible concepts for communication and engagement with broad and diverse audiences and constituencies. The project team brought their understanding of CEQA practice as well as the land use and transportation context of Santa Clara County to this effort and were informed by community feedback provided at in-person and virtual events. An important step to further tailor the language and communication tools as part of this process was vetting the language and visuals used in external communications with the firms and CBOs on the engagement team that have local community relationships.

The formal partnerships with CBOs and local Disadvantaged Business Enterprise (DBE) firms were also crucial to ensuring the project team was able to reach historically underrepresented communities. Members of the project team helped identify CBO leaders and how and where to engage local residents in Equity Priority Communities (EPCs). Researchers and students from San José State University (SJSU) and the Mineta Transportation Institute (MTI) conducted literature reviews, spatial analysis, stakeholder interviews, and equity approach review.

The project team sought to strike a balance and interplay between community input and technical analysis. Initially, the community had the opportunity to think broadly and offer a wide range of suggestions about the types of transportation investment strategies that would be most meaningful to them. Analysts then evaluated suggested strategies and developed information about their respective VMT reduction, feasibility, and implementation costs. These results were brought back to the community to have a more focused conversation about the usefulness of the VMT mitigation actions, program structure and administration. These conversations were used to filter and refine the VMT mitigation program specifications.

Flow charts in **Appendix A** show the wide range of topics considered in developing the framework for the Equitable VMT Mitigation Program for Santa Clara County. As the project progressed, the project team tracked questions raised, conducted research about options available, facilitated deep-dive conversations, and incorporated stakeholder input on each option presented. The result is a framework that is responsive to the local community and for which VTA can solicit support from member jurisdictions while building toward a potential implementation phase.

1.3 Equity Framework

The project's equity framework was developed by the project team including its subconsultants and CBO partners, with input from the project TAG. The SJSU/MTI researchers and students contributed to the equity analysis with a literature review for incorporating equity into program frameworks and design, and spatial analysis of equity indices to identify areas for additional community engagement and potential mitigation measure selection. The equity framework is comprised of the following three definitions:

- Definition of an Equity Priority Community (EPC) Area
- Definition of an Equitable Engagement Process
- Definition of an Equitable VMT Reduction Strategy

As noted in **Appendix B**, several established population definitions were considered but it was ultimately decided to use the EPC definition developed by the Metropolitan Transportation Commission (MTC), with the addition of the Alviso neighborhood in San José (a low-income community based on other screening tools). The definitions for an equitable engagement process and an equitable VMT reduction strategy were developed based on the following questions as well as the VTA Stands Against Racism[4] and Diversity Equity and Inclusion Priorities[5] statements:

- What aspects of equity should be considered?
- What criteria are used to judge aspects of equity?
- What are the best methods to measure aspects of equity?

Equity and equity priority stakeholder group definitions are intended to align with the unique context of Santa Clara County and VMT reduction potential of EPC and non-EPC populations.

[4] For more information visit Valley Transportation Authority, VTA Stands Against Racism, June 24, 2020, available from https://www.vta.org/blog/vta-stands-against-racism.

[5] For more information visit Valley Transportation Authority, A statement from Carolyn Gonot, General Manager of VTA, regarding diversity, equity and inclusion, July 5, 2023, available from https://youtu.be/OYar8aWakcI?si=LZYo2BJtMDPieB6R.

1.3.1 Definition of an Equity Priority Community Area

Given this study's focus on developing an equitable framework for VMT mitigation it is essential to define geographic areas that will be prioritized based on their equity-related characteristics. A total of six population definitions were considered for the VMT Mitigation Program Framework: MTC's EPC definition[6] was identified as the preferred definition because it incorporates race, income, language proficiency, age, access to a vehicle, household size, ability status, and rent-burden criteria in Santa Clara County, as noted in **Table 1.** It also overlaps with or encompasses the other definition geographies. (Further context and summary comparisons to alternative definitions are provided in **Appendix B**.)

An EPC is defined as a census tract whose population

- exceeds both threshold values for Low-Income AND People of Color shares, OR
- exceeds the threshold value for Low-Income AND three or more additional variables (items 3 through 8 in **Table 1**).

[6] For more information visit Metropolitan Transportation Commission, Equity Priority Communities Map, March 2021, available from https://mtc.ca.gov/sites/default/files/Equity_Priority_Communities.pdf.

Table 1: MTC Equity Priority Community Demographic Factors and Definitions

Demographic Factor	Demographic Factor Definition	Concentration Threshold
1. Race (People of Color)	People of Color populations include persons who identify as any of the following groups as defined by the Census Bureau in accordance with guidelines provided by the U.S. Office of Management and Budget: American Indian or Alaska Native Alone (non-Hispanic/non-Latino); Asian Alone (non-Hispanic/non-Latino); Pacific Islander Alone (non-Hispanic/non-Latino); Black or African-American Alone (non-Hispanic/non-Latino); and Other (Some Other Race, Two or More Races, non-Hispanic/non-Latino); and all Hispanic/Latino persons.	70%
2. Low Income (<200% Federal Poverty Level)	Person living in a household with incomes less than 200% of the federal poverty level established by the Census Bureau.	28%
3. Limited English Proficiency	Person above the age of 5 years, who does not speak English at least “well” as their primary language or had a limited ability to read, speak, write, or understand English at least “well,” as defined by the U.S. Census.	12%
4. Zero-Vehicle Household	Households that do not own a personal vehicle.[1]	15%
5. Seniors 75 Years and Over	Self-explanatory.	8%
6. People with Disability	The U.S. Census Bureau defines disability as: Hearing difficulty- deaf or having serious difficulty hearing (DEAR); Vision difficulty- blind or having serious difficulty remembering, concentrating, or making decisions (DREM); Ambulatory difficulty- having serious difficulty walking or climbing stars (DPHY); Self-care difficulty- having difficulty bathing or dressing (DDRS); Independent living difficulty- because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping (DOUT).	12%
7. Single-Parent Family	Families with at least one child. To determine whether or not single-parent families exceed tract concentration thresholds, the share of single parent families is calculated as a share of all families regardless of whether or not they have any children.	18%
8. Severely Rent-Burdened Household	Renters paying > 50% of income in rent. To determine whether or not severely rent-burdened households exceed tract concentration thresholds, the share of severely rent-burdened households is calculated as a share of all households regardless of occupancy status (renter or owner).	14%

Notes.
1. Given that this criterion must be coupled with low-income and at least two other criteria, it is considered appropriate to include here despite the perception that its inclusion may otherwise seem antithetical to VMT reduction efforts.

Source: MTC, Plan Bay Area 2050 Equity Priority Communities, 2021, available from: https://bayareametro.github.io/Spatial-Analysis-Mapping-Projects/Project-Documentation/Equity-Priority-Communities/.

An additional benefit of using this definition is that MTC has and will use the EPC definition to fund or prioritize the following types of transportation solutions in the San Francisco Bay Area:[7]

- The California Active Transportation Program (ATP)
- Mobility Hubs Pilot Program
- Innovative Deployment to Enhance Arterials – Shared Automated Vehicles (IDEA SAV) program
- The California Affordable Housing and Sustainable Communities (AHSC) program
- Community Action Resource & Empowerment (CARE) program
- Safe and Seamless Mobility Quick-Strike program
- Community-B based Transportation Plans

These programs provide funding and policy structure that could be expanded for the Equitable VMT Mitigation Program, thus increasing the benefits experienced within EPCs. MTC's EPC areas also have the largest footprint of the disadvantaged population definitions options with multiple demographic factors considered and generally aligns with the other statewide definitions of low-income communities screens (per Assembly Bill 1550).[8]

The final Equity Priority Areas definition for this project, presented in **Figure 1**, includes Santa Clara County communities that meet MTC's EPC definition as well as the Alviso neighborhood in San José. Alviso is not an MTC EPC, but VTA requested its inclusion as an Equity Priority Area because it meets MTC's threshold for People of Color share, and it has been identified through other screening criteria such as the AB 1550 low-income communities definition. Through the remainder of this report, the Equity Priority Areas defined for this project (MTC EPCs plus Alviso) are referred to as EPCs for convenience. It is important to note that the definition of equity communities may evolve further in a later implementation phase in response to community and stakeholder feedback.

[7] Refer to this website for more details on how the EPC framework is used in funding transportation projects: Equity Priority Communities | Association of Bay Area Governments (ca.gov)

[8] For more information, see AB 1550 Low-Income Communities, available from https://gis.carb.arb.ca.gov/portal/apps/experiencebuilder/experience/?id=6b4b15f8c6514733972cabdda3108348

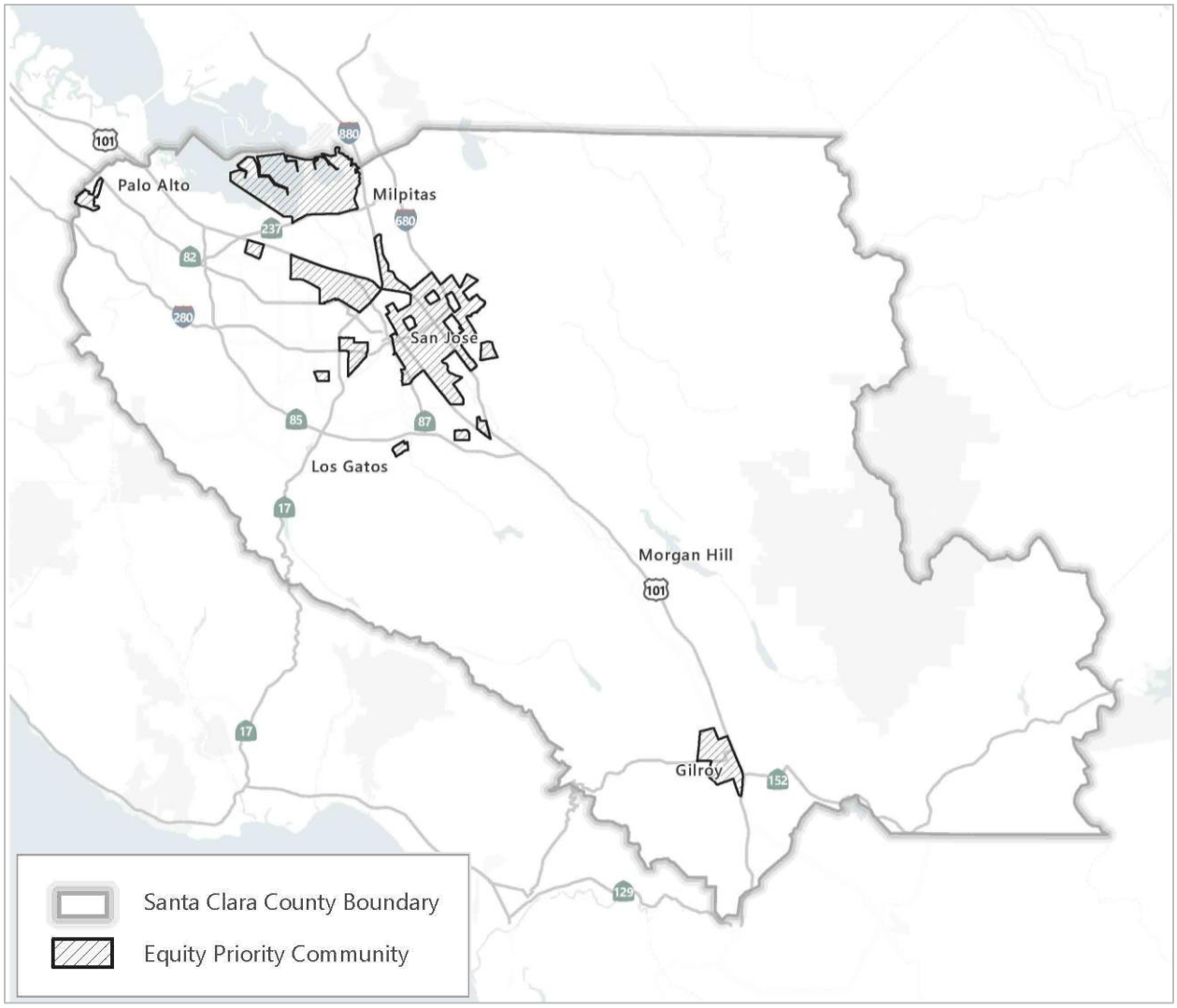


Figure 1: Equity Priority Areas within Santa Clara County for this project

1.3.2 Definition of an Equitable Engagement Process

An equitable engagement process definition is a process that exemplifies the following:

- Pursue racial and social equity by disaggregating travel analysis by race and transparently discussing disparities within the community.
- Listen to, understand needs, and strive toward co-creation and shared ownership of the VMT Mitigation Program Framework with EPCs.[9]

[9] In this context, co-creation is the practice of not only collaborating with stakeholders but integrating the diverse experiences and insights of participants to create a countywide Equitable VMT Mitigation Program Framework focused on those with the greatest needs and barriers.

- Acknowledge the history of disinvestment and other governmental actions affecting EPCs as well as how that history hinders or enhances people's daily lived experience, travel patterns, and opportunities.
- Develop engagement materials that are understandable to the target audience, meeting people where they are, and using relatable examples to improve understanding and craft a clear, easy-to-follow narrative.
- Evaluate the current state of VMT and travel patterns in neighborhoods throughout the county, EPC, and non-EPC areas, and develop VMT reduction strategies that most benefit EPC areas.
- Clearly inform EPC populations and other stakeholders about the relative VMT reduction benefits of implementing housing and land use strategies, active transportation, or other public infrastructure investments, to help shape the VMT reduction strategies included in a program framework.
- Identify current infrastructural, institutional, and other strengths and gaps to more sustainable transportation options, emphasizing local context.
- Listen to and collaborate with each community to understand their lived experience, priorities, and strategies and solutions to reduce existing disparities and maximize benefits of the future VMT mitigation program.

1.3.3 Definition of an Equitable VMT Reduction Strategy

An equitable VMT reduction strategy hinges on understanding the distribution of VMT rates between and within different areas of Santa Clara County and identifying which VMT rates need to be reduced to achieve desired VMT targets. The six metrics below identify the most important VMT rates to modify:[10]

1. No excess VMT would be generated by new development in Santa Clara County.
2. EPC areas with low VMT rates would decrease, maintain, or increase their average VMT rate.[11]
3. EPC areas with high VMT rates would decrease their average VMT rate.
4. Non-EPC areas with low VMT rates would decrease their average VMT rate.
5. Non-EPC areas with high VMT rates would decrease their average VMT rate.
6. Non-EPC areas would decrease their average VMT rate.

Put simply, Metric 1 identifies the overarching need to reduce VMT countywide. Metrics 2 through 6 identify VMT reduction objectives for different populations (EPC and Non-EPC areas) within Santa Clara County. Though desired outcomes may differ for EPC and non-EPC areas,

[10] In this context, a "Low VMT" community has a VMT rate below a baseline value while a "High VMT" community has a VMT rates above a baseline value.

[11] The low VMT of some EPC areas may reflect an undesirable lack of vehicle mobility options rather than transportation preferences. It is important for the program to allow for flexibility in VMT rates to accommodate improved vehicle access and vehicle mobility for low VMT EPC areas.

overall, the non-EPC areas and entire county must reduce their VMT rates. Refer to **Appendix B** for details.

1.4 VMT Mitigation Program Options

There are several ways a VMT mitigation program could be structured. A program-based approach to mitigation can be more effective than project-site strategies. Programs can pool mitigation contributions to pay for larger and more effective VMT reduction strategies that would not be feasible for individual projects as well as facilitate funding and implementation of cross-jurisdictional or regional VMT reduction strategies. Following is a summary of three program types under consideration for incorporation into the VMT Mitigation Program Framework for Santa Clara County: VMT-based impact fees, VMT exchanges, and VMT banks. More information about VMT mitigation program options, including a comparison of the three options and how they relate to community and stakeholder feedback, is included in Chapter 5.

1.4.1 VMT-Based Impact Fees

A VMT-based impact fee is a traditional impact fee program in compliance with the California Mitigation Fee Act [California Government Code §66000-66001][12] which would allow a Project Applicant to pay a pre-determined fee toward the cost of a set of mitigation actions. The required nexus for the fee program is a VMT reduction goal consistent with the CEQA threshold established by a Lead Agency for SB 743 purposes. A nexus study would be required to determine how much VMT reduction the fee program would achieve, and each applicant would pay their fair share of that reduction.

The main difference between this structure and a fee program based on a metric such as vehicle level of service (LOS) is that the VMT reduction nexus results in a capital improvement program (CIP) consisting largely of transit, bicycle, and pedestrian projects. These types of fee programs are time consuming to develop, monitor, and maintain, but are recognized as an acceptable form of CEQA mitigation at the General Plan level if it can demonstrate that the CIP projects will be fully funded and implemented. The limitations placed by the Mitigation Fee Act mean that fee revenue should not be spent on operational or programmatic VMT/GHG-reduction actions, such as operating transit services, offering transit pass subsidies, or operating a bike-share program.

[12] California Government Code §66000-66001, the Mitigation Fee Act, establishes the rules under which local agencies may establish mandatory fees to cover a portion of the costs of capital improvements for public facilities that are needed as a result of new development. More information on the MFA is available at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=1.&title=7.&part=&chapter=5.&article=.

1.4.2 VMT Exchanges

A VMT exchange requires a Project Applicant to fund and/or directly implement one or more mitigation actions selected from a pre-qualified list, or to propose and fund a new action that meets the exchange's eligibility criteria. The VMT-mitigating action may be near the project, elsewhere in the jurisdiction in which the land use project is located, or possibly outside the jurisdiction in the case of a countywide or regional program. Because each mitigation action must be implemented in its entirety, the applicant may end up funding an amount of VMT reduction that exceeds their project's impact. Unlike a mitigation fee program, this list could include operational and programmatic actions, in addition to capital improvement projects.

An exchange must have a facilitating entity that can match a land use project with a VMT reducing action. This facilitating entity could be the CEQA Lead Agency or another entity that can match a land use project to an action and ensure through substantial evidence that the VMT reduction is valid. There are two considerations with this approach. First, the period over which VMT reduction would occur (the number of years of VMT reduction required to declare a VMT impact less than significant) is less clear. Second, a VMT exchange program matches a Project Applicant with specific mitigation actions and therefore an applicant would need to fund an entire mitigation action in full. Given the latter limitation, a VMT exchange should allow applicants to choose among a relatively long list of pre-qualified projects with varying magnitudes of VMT reductions and costs, and potentially develop a credit system to better right-size mitigation cost with mitigation need.

1.4.3 VMT Banks

This scenario is like an exchange except that the bank administrator sets a monetary value for VMT reduction such that a Project Applicant can purchase exactly the number of VMT reduction credits needed to mitigate their project's impact. The money exchanged for credits would be applied to VMT reduction actions. Like all VMT mitigation, substantial evidence that the projects covered by the bank would achieve expected VMT reductions is required. The bank may also require some form of monitoring. A bank is more complicated than a VMT exchange and would require more time and effort to establish and implement. The verification of how much VMT reduction is associated with each dollar or credit is a difficult facet of the program.

1.5 Research Scan of Current Statewide Practices in VMT Mitigation

The project team researched VMT mitigation programs throughout California in mid-2023 to learn what range of options have been considered and, as applicable, implemented by other county and/or regional agencies pursuing a VMT mitigation program.

1.5.1 Summary of Documents Reviewed and Key Findings

The research scan identified a total of 11 VMT mitigation programs developed or proposed by a range of city- and county-level agencies and metropolitan planning organizations from northern and southern California. Programs reviewed include the following:

- City of Escondido VMT Exchange Program
- City of Petaluma VMT Exchange Program
- City/County Association of Governments of San Mateo County (C/CAG) VMT/GHG Model Mitigation Program
- Contra Costa Transportation Authority (CCTA) Vehicle Miles Traveled (VMT) Mitigation Program Study
- Fresno Council of Governments (COG) Regional VMT Mitigation Program Study
- Los Angeles County Metropolitan Transportation Authority (LA Metro) VMT Mitigation Program
- San Bernardino County Transportation Authority (SBCTA) VMT Bank Program
- San Gabriel Valley Council of Governments (SGVCOG) Regional VMT Mitigation Program
- Santa Cruz County VMT Mitigation Program
- Southern California Association of Governments (SCAG)/Los Angeles Department of Transportation (LADOT) VMT Exchange Program/Universal College Student Transit Pass (U-Pass) Program
- Western Riverside Council of Governments VMT Exchange Program

The research scan centered on the program type and purpose, project types subject to participation in the program, the structure of participation, and current program status. Findings from the statewide practice scan are summarized in a matrix available as **Appendix C**.

Programs included in the scan represent the following program types:

- Four VMT exchanges
- Two VMT banks
- Five programs in-progress (i.e., under development without an identified structure)

Regarding the source of VMT impacts mitigated by these programs:

- Five focus on land development projects
- Two focus on transportation projects
- Three focus on both land development and transportation projects
- One does not yet specify a focus

Existing precedent is only moderately concentrated on VMT exchange programs, though there is greater overall precedent for impact fees to be used in the development context. Thus far, most programs are designed to provide some variety of mitigation actions which can be used to

address VMT impacts, though some focus on specific modal objectives. For example, the only adopted and implemented program is the City of Escondido's VMT exchange.[13] The City of Escondido program is structured such that a developer participating in the exchange funds bicycle improvements in an amount commensurate with the VMT impact and VMT reduction associated with a given project.

As part of this research scan, VTA staff conducted video calls with staff from three agencies pursuing programs around the state. These agencies included the Contra Costa Transportation Authority (CCTA), the City/County Association of Governments in San Mateo County (C/CAG), and LA Metro in Los Angeles County. The participants in these calls discussed the status of their VMT mitigation program efforts, lessons learned to date, how equity was incorporated into the planning process, and other topics. Through these calls and related research, the project team learned more about the connection between the CCTA VMT Mitigation Program Study and the planned I-680 Mobility On Demand (MOD) platform; about the way C/CAG's VMT/GHG mitigation effort follows an agency-wide equity assessment and framework; and about the Equity Planning and Evaluation Tool (EPET) which LA Metro staff is applying to the VMT Mitigation Program as a pilot.

The review of current practices provides a broad perspective on trends in this area and highlights key insights for developing this program framework. Further details on these programs' administrative and funding structures, VMT mitigation documentation, and considerations for additionality will be valuable as they become available and would inform a potential future implementation phase for the program in Santa Clara County.

[13] For more information, visit City of Escondido Vehicle Miles Traveled Exchange Program, 2022, available from https://www.escondido.org/Data/Sites/1/media/Planning/VMT/EscondidopublicIS-ND_Oct2022.pdf

Chapter 2: Local Mitigation Practices and Needs

The project team researched and conducted analysis on VMT mitigation practices and travel needs relevant to Santa Clara County, thus grounding subsequent stages of the project in an understanding of the local context around this issue. This effort was principally focused on the VMT reduction practices, needs, and challenges of local jurisdictions; the local demand or need for VMT reduction; and travel challenges and needs identified by CBOs and community members. The following sections describe the process and outcomes of this research and analysis effort.

2.1 Local VMT Mitigation Practices, Needs and Challenges

To understand current VMT mitigation practices and needs as practiced by the local jurisdictions of Santa Clara County, the project team conducted a web survey followed by a series of discussion-based focus groups. The survey and subsequent discussions centered on jurisdictions' experience using VMT in the CEQA process; VMT thresholds and policies; potential VMT mitigation measures; use of CEQA streamlining; VMT monitoring; current approach to mitigation of transportation impacts; estimates of local projects that could use a countywide VMT mitigation program; and highlights of needs and challenges.

2.1.1 Summary of Results: Web Survey of Local VMT Transportation Mitigation Practices

The project team administered a web survey for local jurisdiction transportation and planning staff in late summer 2023. The web survey consisted of 19 questions structured as a mix of 12 multiple-choice and 7 open-ended questions. The survey garnered 14 responses from 13 unique jurisdictions and all but five questions were answered by all respondents. Refer to **Appendix D** for a summary of the survey questions and results.

Local jurisdiction needs include context-appropriate data about VMT generation and reduction for use in the CEQA process to support conclusions regarding VMT impacts and VMT reduction effectiveness; and more off-site VMT mitigation options which could be applied to projects that cannot fully mitigate impacts on-site. This project is intended to address the second of those needs.

Survey responses identified five VMT mitigation challenges related to the aforementioned needs:

- Limited availability of on-site VMT mitigation options.
- Uncertainty associated with VMT mitigation data and effectiveness calculations.
- A scarcity of VMT mitigation options for developments in rural and/or unincorporated areas of the county and industrial land uses.
- Limited extent and effectiveness of transit as a VMT mitigation measure.
- The need to mitigate projects for CEQA purposes rather than for the achievement of equity objectives; the two are not inherently and/or consistently compatible.

When asked what categories of VMT reduction measures would be most helpful to local jurisdictions, respondents identified "Access to Vehicles," "Mobility Services," and "TDM Programs and Incentives" as the top three.

The full survey and summarized results are available in **Appendix D**.

Highlights of comments from local jurisdiction staff:

- *"Achieving City staff expertise and policy-maker familiarity with VMT concepts is key…and a challenge."*
- *"City staff found it difficult to identify a meaningful, VMT-reducing improvement in a high-VMT area."*
- *"Concerns include reconciling the City's VMT goals with GP policies related to maintaining acceptable LOS at major intersections."*
- *"State guidance on how to assess VMT impacts do not work well in rural unincorporated areas, or for regional serving uses or attractions."*
- *"A key mitigation measure prioritized by the City includes transit service improvements that are dependent on its partnership with VTA."*
- *"[The Project team needs] to define [the] primary purpose of [the] program. Equity should be secondary and should not dominate or utilize all the available resources. Why does the outreach plan focus on equity rather than countywide VMT solutions? This is a CEQA process solution."*

2.1.2 Summary of Focus Group Meetings: Local Practices, Needs, and Challenges

In November 2023, two focus group meetings were held with local jurisdictions to collectively discuss survey responses and create an opportunity to share nuanced perspectives of value to the project. These meetings were attended by 31 participants representing 15 of 16 local jurisdictions. Content presented by the project team centered on research findings related to statewide VMT mitigation practices, results of the local jurisdiction web survey, and the potential

VMT reduction needed (refer to the next section of this chapter and **Appendix E**). Subsequent discussion was framed around key questions raised by these findings:

- Why were the "Access to Vehicles" and "Mobility Services" VMT reduction measure categories identified as most attractive by local jurisdictions?
  - These were identified as measures that would increase and enhance transportation options for a wide range of people in the absence of more substantial, and desirable, improvements to transit service coverage, frequency, and reliability. They could also help address first-mile/last-mile connections to transit and improve access to shops and services.
- What challenges associated with collecting VMT data and monitoring VMT impact mitigation are most challenging for your jurisdiction?
  - The biggest concern was collecting data correlated with VMT impacts. Several jurisdictions use trip counts as a proxy for VMT. Some are considering purchasing Big Data sources to better quantify, monitor, and evaluate VMT impacts.
- What are your needs and/or concerns related to VMT screening and the use of CEQA streamlining for VMT?
  - Some jurisdictions that have not adopted VMT screening criteria are experiencing difficulty doing so because many new development projects would not screen out of detailed VMT analysis (e.g., Morgan Hill and Gilroy). Communicating VMT issues has also been challenging and made it difficult to adopt related policies.
  - San José staff expressed that they do not want CEQA streamlining to inadvertently encourage development in high VMT areas. Most of San José's planned growth areas already screen out for VMT.
- Based on existing VMT reduction practices and needs, do you think a countywide VMT reduction program should select a larger VMT reduction target? (e.g., should the target VMT rate for mitigation be established at 85 percent of the baseline VMT rate, at 70 percent, or something else?)
  - Consensus was not reached on this, but participants provided valuable input on the relative merits of pursuing a more achievable target (e.g., 85 percent) versus a more ambitious, but challenging target (e.g., 70 percent). Some jurisdictions expressed support for the more ambitious target (70 percent) because they believe this will eventually be necessary to meet State greenhouse gas reduction goals. Others preferred a target of 85 percent perceiving it to be more feasible for their jurisdictions to achieve and because it matches their current SB 743 VMT policies. For the purpose of this program framework both options were analyzed, as discussed in the next section.
- Should VMT reduction strategies be focused in localized high-VMT areas? Should VMT reduction strategies be focused in EPC areas? How should the program account for the fact that some EPC areas are low-VMT while others are high-VMT?

- Overall, jurisdictions expressed a desire to ensure a clear relationship between where VMT mitigation money goes relative to where impacts originate. There was some interest in focusing mitigation on localized high-VMT areas and EPCs, but potentially with a return-to-source component to maintain value for the jurisdiction in which VMT impacts originate.

Overall, the focus groups provided an opportunity for learning and sharing and fostered conversation regarding current practices and potential program trade-offs. The full discussion was documented and has been incorporated into the framework for the Equitable VMT Mitigation Program.

2.2 Local Needs for VMT Reduction Measures

When considering an Equitable VMT Mitigation Program Framework for Santa Clara County, it is important to understand the magnitude of VMT impacts that could occur within Santa Clara County over a given period, and the magnitude of VMT reductions that could be needed to mitigate those impacts. For this study, the time period used is 25 years, a typical duration for long-term planning efforts. Estimating local needs for VMT reductions is a complex question that relies upon assumptions regarding the number of new projects that may occur over that period; how much VMT is likely to be generated by each of those projects; and how each Lead Agency will apply its CEQA thresholds to those projects to determine the level of significant VMT impacts and associated mitigation requirements.

It is not possible to know these details with certainty. Therefore, the analysis resulted in a range of possible outcomes that could inform considerations around how a VMT mitigation program framework could be effectively designed and implemented. This analysis was conducted for the model years 2015 and 2040.[14] **Appendix F** provides a detailed description of the methods and analysis of VMT rates in Santa Clara County, and estimates of potential VMT reductions needed.

2.2.1 Santa Clara County Land Use and VMT Growth between 2015 and 2040

The VTA travel model was used to gain an understanding of the need for future VMT mitigation. Analysis began with a review of the projected growth and transportation changes anticipated for the area, followed by increasingly detailed summaries of VMT reductions required at the county, jurisdiction, EPC, and non-EPC levels.

Over a planning horizon of 25 years, the project team estimates that future land use and transportation projects in Santa Clara County may generate *11,420 or more daily VMT that*

[14] As this is an example analysis, the years 2015 and 2040 were chosen because they are the base and future year, respectively, of the VMT travel model.

would require mitigation. The sources of those estimates are described further in the next section and in greatest detail in **Appendix F**.

2.2.1.1 Santa Clara Countywide Total VMT per Service Population

Between 2015 and 2040 the residential population is estimated to grow by 697,400 residents (a 37 percent increase) and the worker population is estimated to grow by 262,180 employees (a 25 percent increase). The total service population (sum of residents and employees) for Santa Clara County is anticipated to increase by about 33 percent between 2015 and 2040. **Figure 2** presents the growth in residents and employees (i.e., service population in Santa Clara County).

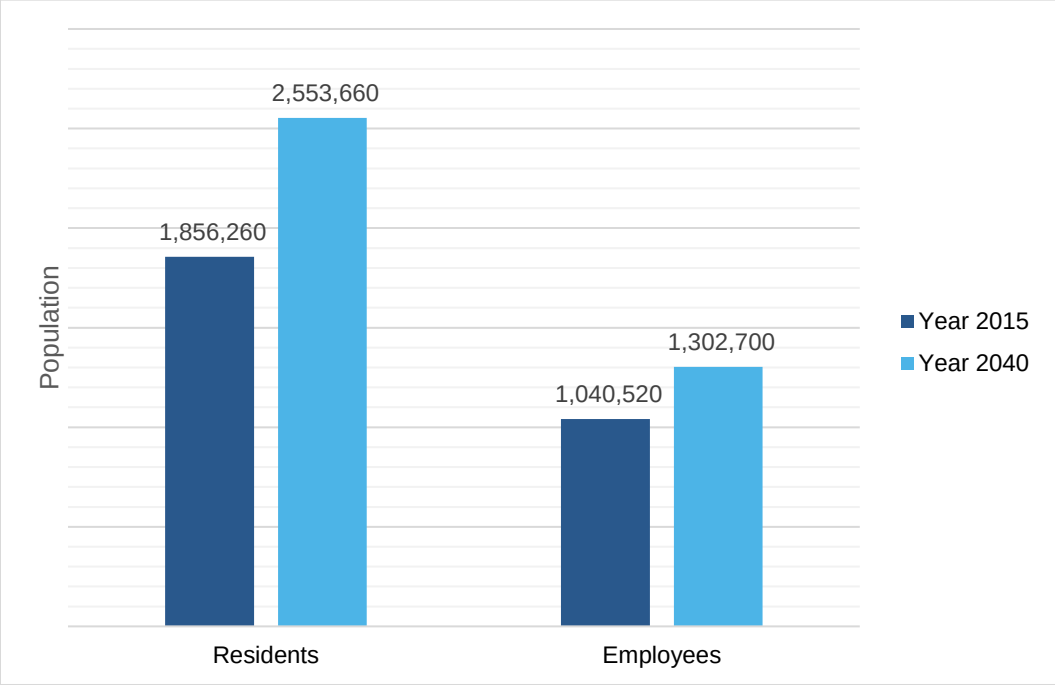


Figure 2: Change in Santa Clara Countywide Service Population

Figure 3 presents the total VMT for Santa Clara County. Though the overall VMT increases, it would do so more slowly than the service population. Therefore, the rate of total VMT per service population would decrease by almost four percent from 2015 to 2040.

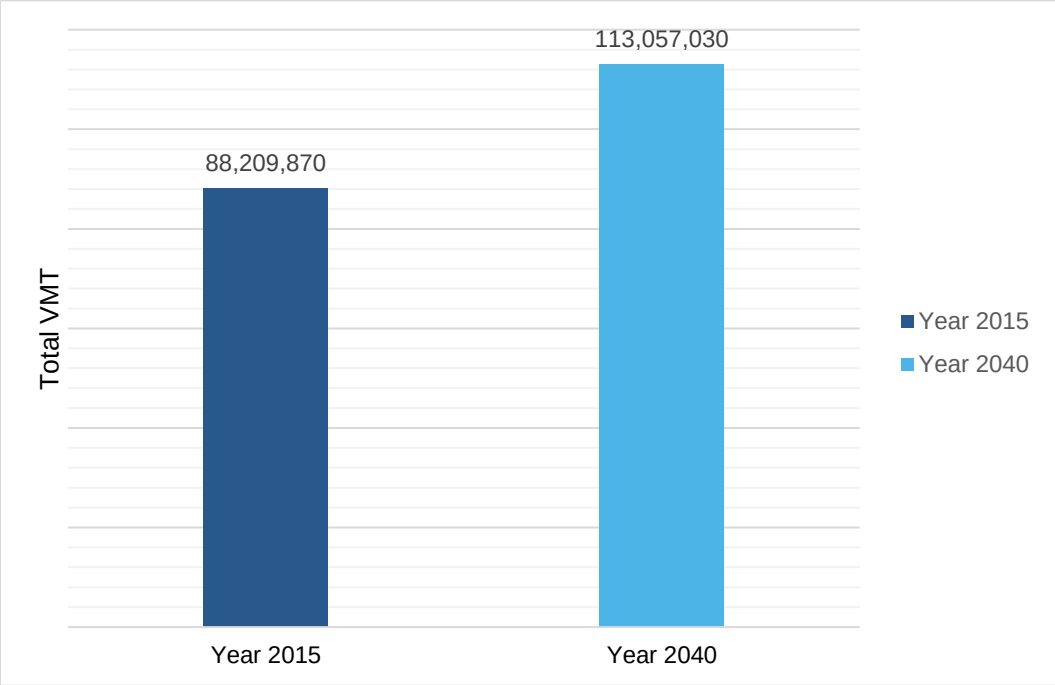


Figure 3: Change in Santa Clara Countywide Total VMT

When the project team distinguishes total VMT per service population rates between EPC and non-EPC areas (presented in **Figure 4**), it becomes evident that EPC areas have lower overall VMT rates than non-EPC areas. Over the period of this study, both EPC and non-EPC areas are projected to experience a similar absolute decline in the VMT rate (about one total VMT per service population reduction). However, because the EPC areas start from a lower base value, the percentage decline in VMT rate is slightly greater in EPC areas than in non-EPC areas.

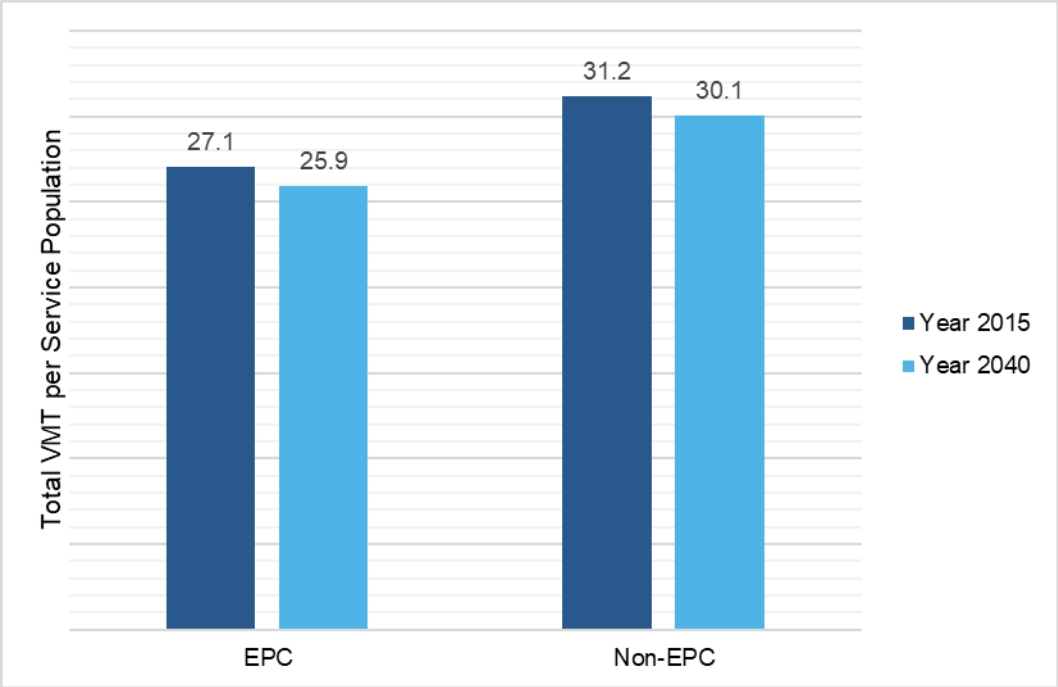


Figure 4: Change in Total VMT per Service Population for Non-EPC and EPC Areas

Table 2 presents performance metrics for equitable VMT reduction definitions based on 2015 data. These values will serve as the program's benchmark for attainment of each definition.

Table 2: Equitable VMT Reduction Definition Performance Metrics

Equitable VMT Reduction Definition[1]	Performance Metric	Performance Metric Value[2]
1. No excess VMT would be generated by the new development in Santa Clara County	Excess VMT[3]	>113,045,610
2. EPC areas with low VMT rates would decrease, maintain, or increase their average VMT rate	Average Total Daily VMT per Service Population	19.2
3. EPC areas with high VMT rates would decrease their average VMT rate	Average Total Daily VMT per Service Population	45.3
4. Non-EPC areas with low VMT rates would decrease their average VMT rate	Average Total Daily VMT per Service Population	19.4
5. Non-EPC areas with high VMT rates would decrease their average VMT rate	Average Total Daily VMT per Service Population	41.2
6. Non-EPC areas would decrease their average VMT rate	Average Total Daily VMT per Service Population	31.2

Notes:
1. Low VMT is defined as equal to or below 85 percent of the countywide Year 2015 total VMT per service population rate.
2. Performance metric values were calculated based on 2015 data from the VTA travel demand model as the average value for total daily VMT per service population for the subset of EPC and non-EPC TAZs identified as Low- and High-VMT, respectively.
3. The threshold for what constitutes excess total daily VMT will be based on the VMT reduction target selected for the program. A target of 85 percent below the baseline total VMT per service population is presented.

Source: Fehr & Peers, 2024.

Detailed information about total VMT per service population by city is available in **Appendix F**.

2.2.1.2 Heat Maps

Heat maps illustrating the areas of high and low total VMT per service population for 2015 and 2040 are presented below in **Figure 5** and **Figure 6**. Data is summarized at the level of VTA travel model transportation analysis zone (TAZ) since this is the level at which analysis was performed. EPC TAZs are located within the MTC's EPC boundaries plus the TAZs that include Alviso.

"Low VMT" is defined as equal to or below 85 percent of the countywide Year 2015 total VMT per service population rate. In general, low VMT areas are concentrated in the middle of the county and tend to align with EPC areas. Put a different way, most EPC areas already have relatively lower VMT generation rates than non-EPC areas, so significant VMT impacts are more likely to occur in non-EPC areas.

Given housing and job targets for the Bay Area and growth assumptions within local jurisdiction General Plans, roughly 85 percent of future development is expected to occur within the

northern part of the county encompassing Palo Alto, Mountain View, Sunnyvale, Santa Clara, and San José, as indicated on **Figure 5** and **Figure 6**. This area overlaps with most EPC areas in Santa Clara County and high and low VMT rate areas.

A fact which can be obscured when looking at **Figure 5** and **Figure 6** is that there are a wide range of total VMT rates within each city. Approximately eighty-five percent of future development in Santa Clara County, both in EPC and non-EPC areas, is anticipated to occur in locations where future VMT rates will exceed the 85 percent below baseline target. Developments proposed in higher VMT generating areas of each city will have a greater VMT reduction need which could be met with a future mitigation program.

A table of total VMT rates per service population is provided in **Appendix F** and may be used as a starting point for future VMT analysis. Additional VMT forecasts would be required to evaluate VMT reduction needed if future development projects result in lower transportation demand than currently anticipated in the VTA travel forecasting model.

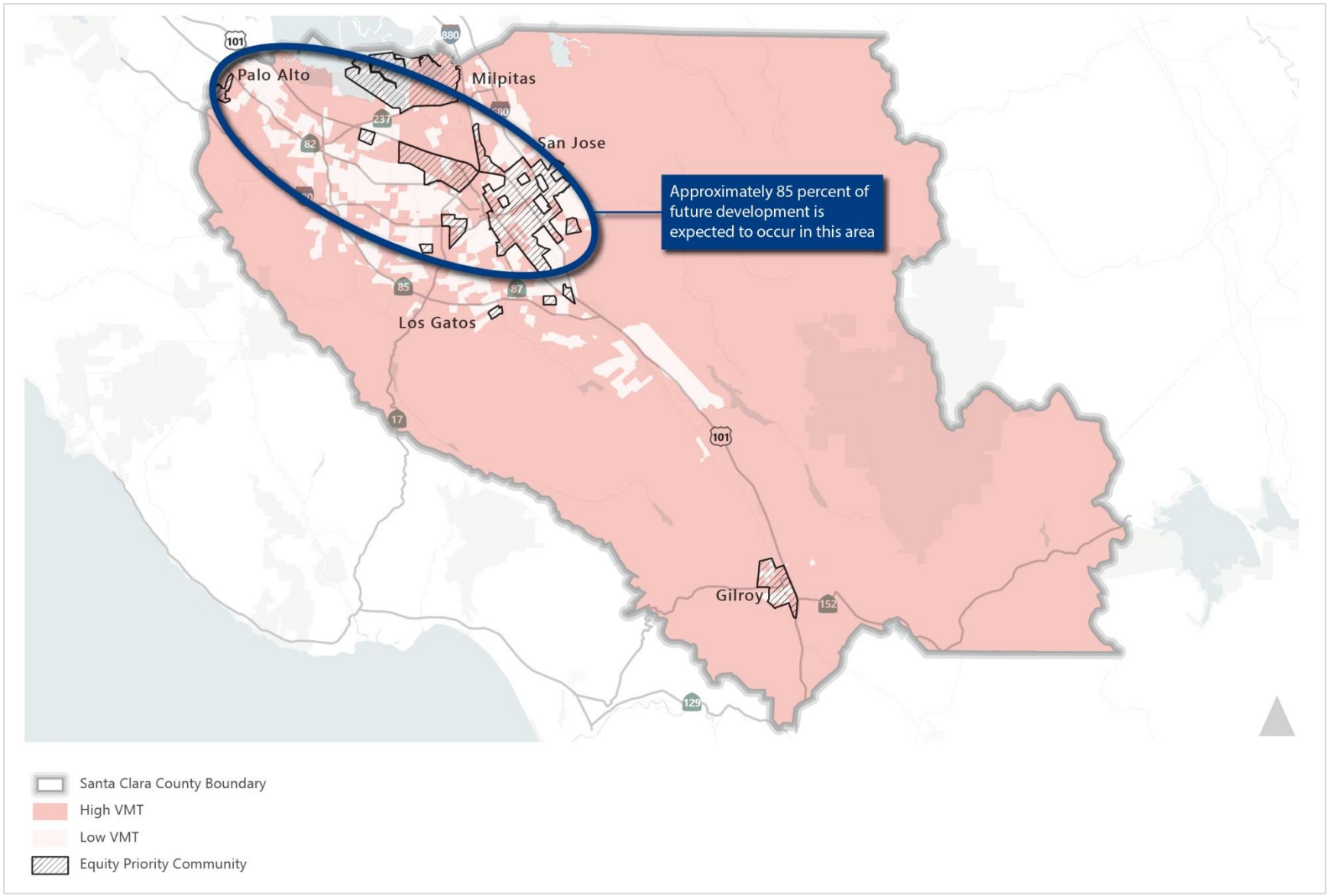


Figure 5: High and Low Total VMT (2015) with Equity Priority Community Boundaries in Santa Clara County

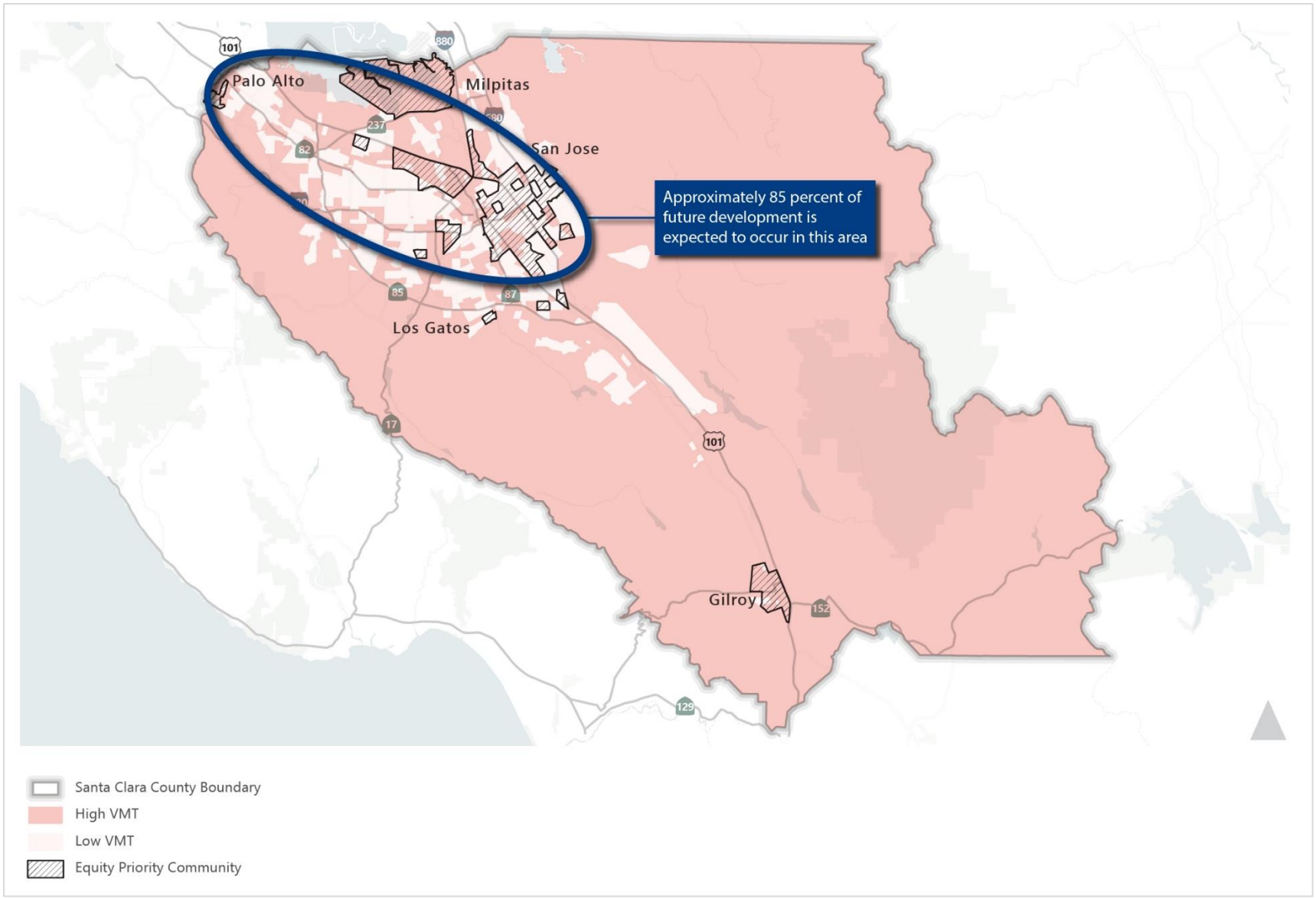


Figure 6: High and Low Total VMT (2040) with Equity Priority Community Boundaries in Santa Clara County

2.2.1.3 Potential VMT Reduction Needed

This section addresses issues identifying where and of what magnitude future VMT reductions might be needed in Santa Clara County, which could help inform the design of a VMT mitigation program framework. This is a complex question and there are a variety of different scenarios that could be explored. For the purposes of this section, the project team looked at the ramifications of setting VMT reduction targets at two different levels:

- Desired Rate is 85 percent of the Baseline Rate: This is consistent with how most local jurisdictions have set their CEQA thresholds under SB 743, in which they have established a goal that new development should generate VMT at a rate that is at least 15 percent lower than the existing baseline.
- Desired Rate is 70 percent of the Baseline Rate: This is similar to the most recent publication from the California Air Resources Board (CARB) in their 2022 Scoping Plan,[15] in which they set a statewide goal that VMT per capita be reduced to 30 percent below 2019 levels by the year 2045 to achieve the state's climate goals.

The values presented in **Table 3** reflect the results of the calculations related to the two VMT reduction targets for future development per CEQA Statues and Guidelines (i.e., future development is allowed to grow at a desired VMT rate). It is important to point out that CEQA thresholds under SB 743 apply to Lead Agency decisions that are subject to CEQA review; hence, these thresholds apply only to future development proposals and are not designed to affect the travel characteristics of existing land uses. Under such scenarios, future development is 'allowed' to grow at the desired VMT rate. The projected amount of new total VMT exceeding the desired VMT growth budget is the difference between the projected net increase in countywide VMT and the 'allowed' net increase in future development total VMT.

[15] For more information, see CARB, 2022 Scoping Plan Documents, 2024, available from https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents

Table 3: Estimates of Potential VMT Reductions Needed under Different Scenarios

VMT Reduction Calculation Components	Scenario 1: Desired Rate = 85% of Baseline Rate	Scenario 2: Desired Rate = 70% of Baseline Rate[2]
1. Baseline VMT Rate (Total VMT per Service Population) (A)	30.45	30.45
2. Desired VMT Rate[1] (B)	25.88	21.32
3. Net Increase in Service Population, 2015-2040 (C)	959,650	959,650
4. Net Increase in Total VMT Budget if Future Growth were to Achieve Desired VMT Rate (D=C*B)	24,835,740	20,459,740
5. Projected Net Increase in Countywide VMT, 2015-2040 (E)	24,847,160	24,847,160
6. Projected Amount of New VMT Exceeding the Desired VMT Growth Budget (F=E-D)	11,420	4,387,420

Note:
1. Note that most local jurisdictions have set a desired threshold at 85 percent of the baseline rate.
2. Note that the 2022 CARB Scoping Plan sets a statewide target of reducing the VMT rate to 70 percent of baseline levels by 2045.

Source: Fehr & Peers, 2024.

The overall countywide VMT rate is projected to decline between 2015 and 2040, based on the assumptions reflected in the VTA travel model. When looking solely at new development's effect on countywide VMT, the results indicate that the modeled growth in countywide VMT is expected to largely align with a target of 85 percent of the baseline rate (that is, the amount of new VMT that exceeds that desired VMT budget is relatively small). However, it is important to note that this result may be misleading in the sense that it blends a wide range of locally specific development proposals which will be evaluated separately (refer to **Appendix F** for details) Future development proposals will be evaluated by the jurisdiction where that development will occur.

There is a wide range of VMT rates across local jurisdictions in Santa Clara County and several jurisdictions are projected to experience increased VMT rates over time, so future developments proposed in those jurisdictions will be more likely to trigger significant VMT impacts, a fact which can be obscured when looking at countywide average VMT values. **Figure 7** presents the existing total VMT alongside the new VMT exceeding the desired VMT growth budget for the 85 percent of baseline VMT rate and 70 percent of baseline VMT rate, respectively.

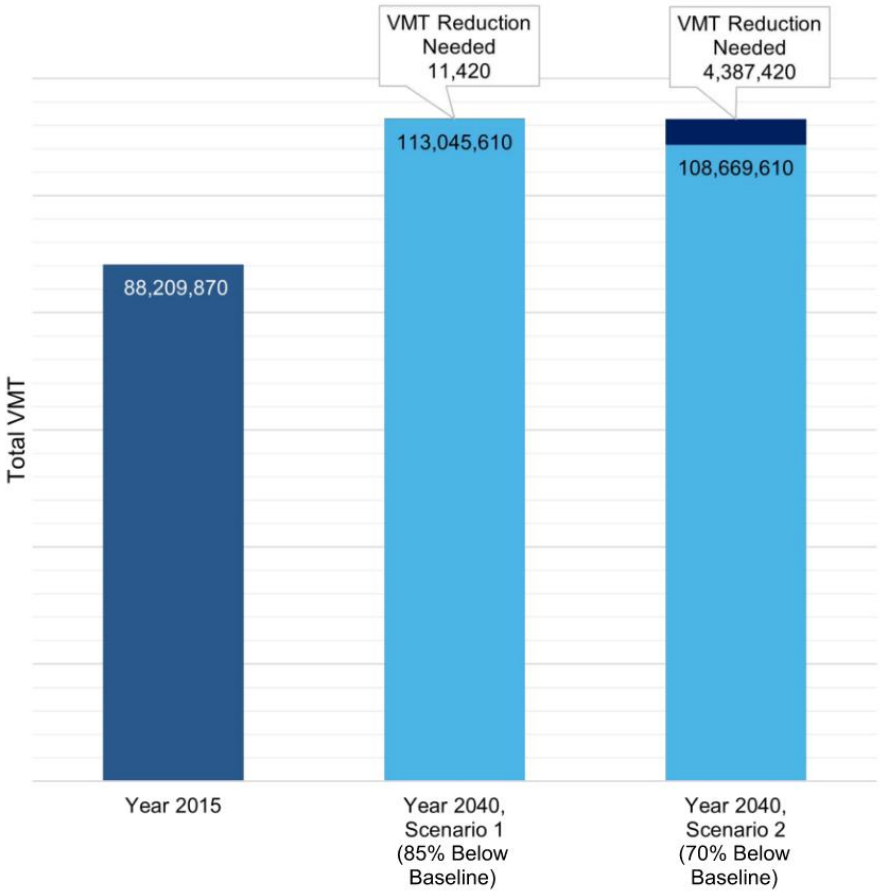


Figure 7: Potential VMT Reductions Associated with Future Development Under Two VMT Rate Scenarios, 2015-2040.

To get more refined geographic information about the potential need for future VMT reductions, **Table 4** looks at the proportion of all the TAZs in Santa Clara County where the future VMT rate is projected to exceed a desired target rate. Two options for the target rate are presented, one being 85 percent of the baseline and the other being 70 percent of the baseline.

EPC areas generally have lower VMT rates than non-EPC areas. Even so, in a scenario where the desired target rate is set at 85 percent of the baseline rate, almost half (47 percent) of the EPC-area TAZs have future VMT rates that would exceed that desired target, and almost 60 percent of the non-EPC area TAZs would exceed that target. If the desired target were set at a more aggressive level of 70 percent of the baseline rate, then even more TAZs would exceed that target; this is particularly notable in the non-EPC areas, where close to three-quarters of TAZs would exceed such a target.

While each TAZ represents a distinct geographic area, some areas will experience more future development activity than others. In a scenario where the desired target rate is set at 85 percent of the baseline, the proportion of future growth occurring in the EPC and non-EPC TAZs with a total VMT per service population rate that exceeds the target is 42 percent and 56 percent,

respectively; this growth represents the future development that would be most likely to trigger a significant VMT impact during a CEQA review process. If the desired target were set at a more aggressive level of 70 percent of baseline, even more future development would occur in TAZs that exceed such a target.

Table 4: Total VMT per Service Population Characteristics by TAZ

		Desired Rate = 85% of Baseline Rate	Desired Rate = 85% of Baseline Rate	Desired Rate = 70% of Baseline Rate	Desired Rate = 70% of Baseline Rate
		% of TAZs with a High VMT Rate	% of Future Growth in High VMT Rate TAZs	% of TAZs with a High VMT Rate	% of Future Growth in High VMT Rate TAZs
EPC Areas	25.90	47%	42%	58%	64%
Non-EPC Areas	30.05	58%	56%	74%	76%
Countywide	29.32	56%	54%	71%	74%

Source: Fehr & Peers, 2023.

2.2.1.4 Key Findings

The information presented here uses a range of methods and scenarios to investigate the amount of and locations where future VMT reductions may be needed, to help inform the design of a VMT mitigation program. Conclusions drawn from these results include the following:

- Overall, the countywide average VMT rates are anticipated to decline over time such that the total amount of countywide VMT will increase more slowly than the countywide population and jobs.
- In general, EPC areas currently have lower VMT rates than non-EPC areas and those VMT rates are expected to decline somewhat faster than the rates in non-EPC areas. This raises interesting questions about how a VMT mitigation program framework could focus its VMT-reducing activities; for example, should the program's focus be on strategies that would further reduce the already low VMT from EPC residents and employees, or should the focus be to accelerate reductions in those non-EPC areas that are currently generating relatively high levels of VMT?
- When looking solely at a new development's effect on countywide VMT, the results indicate that the modeled growth in countywide VMT is expected to largely align with a target of 85 percent of the baseline rate (that is, the amount of new VMT that exceeds the desired VMT budget is relatively small). However, it is important to note this result may be misleading in the sense that it blends a wide range of locally specific actions which will be evaluated separately and will likely result in project-by-project VMT analysis identifying a greater VMT reduction needed.
- There is a wide range of VMT rates across local jurisdictions in Santa Clara County and several jurisdictions are projected to experience increased VMT rates over time,

so future developments proposed in those jurisdictions will be more likely to trigger significant VMT impacts, a fact which can be obscured when looking at countywide average VMT values. Refer to **Figure 5**, **Figure 6** and **Appendix F** for details.

- Existing and future development would need to make substantial reductions in VMT rates to achieve the CARB 2022 Scoping Plan target in support of the state's climate goals, as presented by the third bar in **Figure 7.** Reductions in the VMT rates associated with existing development are, however, beyond the scope of a VMT mitigation program like this project, which is designed to provide mitigation options for future development.
- In both EPC and non-EPC areas, a sizeable proportion of future development is anticipated to occur in locations where future VMT rates would not meet a target of 85 percent below baseline levels. Future developments in such areas would be more likely to trigger a significant VMT impact and to need mitigation options that could be provided by a mitigation program.

2.3 Community Travel Needs and Challenges

Development of VMT mitigation actions that would best serve Santa Clara County requires understanding of individual communities' existing transportation needs and challenges. The project team conducted a series of focus groups with CBOs, stakeholder interviews, and a community web survey designed to capture broad and diverse input. The following discussion describes the methods and findings of this engagement.

2.3.1 Summary of Focus Group Meetings: CBOs

In November 2023, the project team held two focus group meetings with staff from community-based organizations (CBOs) to discuss community needs and challenges relative to VMT mitigation. These meetings were attended by 16 participants representing 15 organizations from around Santa Clara County. Presentations centered on the project introduction, structure of community engagement, and key discussion questions related to the travel needs and challenges of constituent populations. The ensuing discussion, structured around key questions, is summarized below:

- "What transportation challenges do your community members face?"
  - Cost of transit is an issue. For some, low-cost passes are available, but people are not aware they exist.
  - Lack of frequency and long travel time can be a major impediment to using transit.
  - Accessing transit stops or key amenities (e.g., grocery stores) can be challenging where there are not safe or enhanced sidewalks, crossings (i.e., with pedestrian signals, rectangular rapid flashing beacons (RRFBs), etc.), or designated bike routes. Fear of encountering safety issues, including racist comments, further inhibits some constituents from taking transit.

- Overall, low walkability in their neighborhood, lack of street lighting, and lack of bike parking present challenges. Having more neighborhood attractions could help.

- "What solves the biggest challenges community members face?"
  - Providing enhanced bicycle and pedestrian facilities (e.g., protected bicycle lanes, curb extensions and RRFBs at crosswalks, wider sidewalks) would help. Slowing vehicle speeds generally would help people feel and be safer using active transportation modes.
  - Improving the frequency of transit and increasing the visibility of different services and fare options would reduce barriers to using existing transit and transferring between systems or modes.
  - Providing educational resources to make people aware of transit, bike, micromobility, and carpool incentives would be very helpful. Partnering with trusted partners to ensure members of the community are comfortable with these options would be impactful.

Results of small group discussions were reported out to the larger meeting and captured in meeting minutes to inform the program framework.

Highlights of comments from CBO representatives:

- *"Safety is a priority for women and children. Homelessness around/on transit makes them feel unsafe."*
- *"Transit isn't reliable for a night solution to travel."*
- *"Educating people about planning travel logistics and adjusting behaviors to optimize time, transportation, etc. is key."*
- *"Provide shuttles for residents to go to basic needs locations."*
- *"Create transit-oriented communities with mixed-use businesses that are pedestrian friendly to enjoy."*
- *"Increase access to multiple transportation options (e.g., e-bikes, e-scooters in the East Side [of San José])."*
- *"Provide free bus passes/rides during transit awareness months/days for disadvantaged communities."*

2.3.2 Summary of Results: Stakeholder Interviews

To expand upon the engagement conducted by the VTA project team, graduate students from SJSU Urban Planning 236 conducted interviews with community members and representatives from CBOs in Fall 2023, interviewing a total of eight CBO representatives and 12 members of the general public.

Key themes from the interviews about community needs and preferences included the following:

- Connectivity, safety, reliability, and competitiveness with car travel for alternative modes were identified by interviewees as major transportation needs for the community.
- The most prominent new development concerns mentioned by interviewees were congestion and negative impacts for existing residents.
- A majority of interviewees either somewhat supported or conditionally supported developments contributing toward VMT mitigation measures. The main concerns were potential impacts on the cost of housing and housing development, and transparency in program implementation.

Based on these stakeholder interviews, the SJSU students offered several recommendations for the project team to consider in developing a potential Equitable VMT Mitigation Program Framework for Santa Clara County, as well as for VTA to consider more broadly:

- Invest in public transit improvements to create a better-connected and more reliable system as this will make public transit more convenient and increase the attractiveness of this mode.
- Leverage prominent concerns about increased congestion and harm to existing residents from new development to garner additional support for the Equitable VMT Mitigation Program.
- Incorporate information in the project messaging and/or educational materials regarding the potential for development contributions toward VMT mitigation measures to reduce uncertainty in the environmental review process.
- Develop an informative and implementable accountability plan.

Some of the recommendations from the SJSU class were incorporated into later phases of this project by the project team, while others would be addressed in a potential future implementation phase. A full summary of the stakeholder interviews conducted by the SJSU students, including detail on the findings and recommendations, is included in the Mineta Transportation Institute report "Exploring Equity Frameworks for a Cross-Jurisdictional Vehicle Miles Traveled Mitigation Program in Santa Clara County," published in May 2024.[16]

2.3.3 Summary of Results: Web Survey on Community Travel Needs, Challenges, and Preferences

Similar to the local jurisdiction survey described earlier in this chapter, a web survey was broadcast to the broader Santa Clara County community in Fall 2023. The purpose of the survey was to cast a wide net to collect feedback on travel needs, challenges, and preferences throughout the county. The survey was open to anyone who lives, works, or goes to school in

[16] *Exploring Equity Frameworks for a Cross-Jurisdictional Vehicle Miles Traveled Mitigation Program in Santa Clara County*, Mineta Transportation Institute, May 2024, https://transweb.sjsu.edu/research/2346-Vehicle-Miles-Traveled-Transportation-Emissions-Equity

Santa Clara County. The survey consisted of 30 questions, a combination of multiple-choice (24) and open-ended questions (6).

To encourage participation from EPC populations, the project team partnered with local CBOs to help distribute and promote the survey to their communities. The survey garnered over 350 responses from individuals across Santa Clara County. Approximately two thirds of respondents were, however, from households with an income greater than or equal to $100,000 and non-EPC populations. The team supplemented the survey input with pop-up events and CBO focus groups that focused on EPC feedback. The survey consisted of 30 questions, a combination of multiple-choice (24) and open-ended questions (6). The survey garnered over 350 responses from individuals across Santa Clara County.

In addition to providing context around how respondents get to work or travel throughout an average day, responses highlighted a few priority needs related to travel and VMT mitigation. The majority of respondents indicated that “travel time/speed” is most important to them when choosing how to get around for regular travel and occasional trips, with “cost/affordability” and “availability/convenience of location” distant second- and third-ranking options. The majority of respondents indicated that they normally used transit, walking, or biking modes for their regular trips, and there was relatively low interest in carshare or carpooling/vanpooling.

Fifty-two percent of respondents indicated they require a vehicle to meet their day-to-day needs. In response to both “Which of the following would make you drive less frequently?” and “What would you like to see more of in Santa Clara County?” respondents ranked the VMT reduction categories in this order: “frequent and fast transit service,” “biking and walking paths,” and “many things to do close by.”

Responses to open-ended questions provided additional context regarding the personal experiences that contribute to these trends. The following represents a few quotes from answers to the question: “Do you have a story or comment to share? Please share any other information about your travel needs, challenges, and priorities.”

Highlights of comments from the web survey:

- *"Frequency of service. Buses not having signal priority or getting held up in traffic. Badly timed transfers."*
- *"Home to work takes 12 minutes driving alone vs 50+ minutes by Caltrain + VTA. Bicycling is feasible but zigzags along unpleasant wide roads with narrow bike lanes, and busy intersections with slip lanes and long red time."*
- *"Public transportation is neither fast nor frequent enough. I would love to use it for more things more regularly, but when the bus only comes every 30 minutes (at best) on the routes near me, it's hard to justify using it."*
- *"Money is my biggest issue. I make minimum wage so even Clipper is hard to afford."*
- *"Weekend service is too limited. The weekend is when I have the most places to go to other than work but have the fewest options available."*
- *"Lack of dense development in Santa Clara County means there's less available to you on foot, bike, or bus."*
- *"Long headways, inconvenient times, service that does not run late at night."*
- *"The public transit in the areas VTA serves is so spread out that it is difficult for me to get to the transit stations themselves and still makes me car-dependent…I have to ask someone to drive me from home to the station, and then once I get off the station, have someone drive me from there to work. I can't rely on public transportation."*
- *"Long headways between service, inconvenient departure times, service that does not run late at night."*

The full survey and summarized results are available in **Appendix G**.

Chapter 3: Community and Stakeholder Engagement and Consensus Building

Community engagement is essential to the development of the Equitable VMT Mitigation Program Framework in alignment with VTA's commitment to involving a diverse cross-section of the community. During the summer of 2023, the project team created an Engagement and Consensus Building Plan to ensure a thoughtful and inclusive process, particularly focused on EPC populations and areas. This plan aims to provide a robust and equitable engagement process for framework development. Refer to **Appendix H** for more information.

The following sections provide a summary of the goals of engagement and consensus building for this project; a summary of the three phases of engagement and consensus building; a summary of the Technical Advisory Group (TAG) process; and a summary of the VTA Committee and Board review process.

3.1 Goals of Engagement and Consensus Building

The overall engagement process was designed with the intention of achieving the following outcomes:

1. **Understand Program Goals and Impacts:** EPCs, EPC Community-Based Organization (CBO) leaders, and staff from local jurisdictions are familiar with the Equitable VMT Mitigation Program Framework and understand the goals and potential impacts of the program at an appropriate level. By increasing the knowledge of these community members and leaders, the project team can collect informed and constructive input on the Equitable VMT Mitigation Program.
2. **Reach Wide Spectrum of Community:** Engagement activities meaningfully engage a wide spectrum of community members, especially traditionally hard-to-reach populations, and connect with key stakeholders across the county. Fehr & Peers will work with subconsultants, CBO partners, and VTA staff to intentionally and effectively seek feedback from EPCs by developing and working to meet quantifiable metrics of success.
3. **Reflect EPC Input:** The Equitable VMT Mitigation Program Framework reflects EPC input, including shaping the VMT mitigation strategies that are recommended.
4. **Understand How Input is Used:** Community members and stakeholders understand how their input is used in developing the program framework and shaping the VMT reduction strategies with the goal of building consensus, particularly with EPCs.

The project team worked to identify a list of key communities and stakeholders from which to gather and integrate input on the framework for the Equitable VMT Mitigation Program with the objective of including a broad range of communities and groups that reflect the diversity of Santa Clara County and provide a variety of perspectives on transportation and land use. These groups include the following:

- EPC Populations and General Public
- Community Based Organizations (CBOs)
- Local Jurisdictions
- Researchers and Students
- Technical Advisory Group (TAG) Stakeholders
- Decision-makers, such as members of VTA Board Committees

3.2 Engagement and Consensus Building Phases

Engagement efforts for the project were divided into Phase 1: Broad and Diverse Input, Phase 2: Filter and Refine, and Phase 3: Confirm with each phase including specific areas of input. Each phase of the engagement process targeted and engaged EPC populations and areas early and often while providing a range of engagement activities to effectively solicit meaningful feedback and incorporate it into the project decision-making process. The progression and focus for each phase are as follows:

- Phase 1: Broad and Diverse Input (September through December 2023)
- Phase 2: Filter and Refine (April through July 2024)
- Phase 3: Confirm (October through December 2024)

In between each phase, other community feedback regarding needs, challenges, and ideas for improvements was received from local jurisdictions, the county, and relevant groups at VTA.

The Engagement and Consensus Building Plan outlined the project team's initial strategy for all three phases of community engagement before Phase 1: Broad and Diverse Input began. However, between Phases 1 and 2, and again between Phases 2 and 3, the team held meetings to debrief outreach events, review feedback received, and discuss how to refine the plan accordingly. This led to some adjustments in event types and timing.

During Phase 2: Filter and Refine, the team decided to replace originally planned pop-up events with in-person community workshops to facilitate deeper discussions. During Phase 3: Confirm, the team will hold one virtual community meeting for public input on the draft report, an agendized Discussion Item at five VTA Board Committee meetings, and several stakeholder meetings. These events will be designed to confirm the VMT mitigation program framework and gather feedback on three program elements: (1) implementation considerations for the three VMT reduction project types; (2) the recommendation that VTA serve as Program Sponsor; and (3) the recommendation to start with a VMT exchange that potentially evolves to a VMT bank.

The following sections summarize the actual events, participants, activities, and materials used during the three phases of engagement for the project.

3.2.1 Phase 1: Broad and Diverse Input

Phase 1: Broad and Diverse Input occurred in Fall 2023 and solicited input on people's lived experience with transportation including behaviors, challenges, and needs. This included engagement with residents, workers, and students, and had the aim of achieving the following four goals:

- Solicit broad feedback from a wide spectrum of stakeholders and community members.
- Gather information on existing travel behaviors, challenges, and needs.
- Gather information on existing VMT mitigation practices.
- Solicit feedback on a broad set of VMT reduction categories.

The project team endeavored to collect wide-ranging feedback to better understand community and local jurisdiction preferences on which categories of VMT reduction strategies would address people's biggest travel challenges. To encourage the participation of EPCs, the team worked with its CBO partners to host pop-ups in EPC areas and to encourage participation from the communities in which the CBO partners frequently work.

3.2.1.1 Summary of Engagement Events and Participants

The project team hosted the following events as part of Phase 1: Broad and Diverse Input:

- 6 Pop-up tabling events
- 1 Virtual community meeting
- 1 Community web survey
- 1 Local jurisdiction web survey
- 2 CBO focus groups
- 2 Local jurisdiction focus groups
- 2 Technical Advisory Group meetings
- 3 Online explainer videos
- 20 Stakeholder interviews (conducted by SJSU students)
- 6 Presentations / video calls with organizations or local jurisdictions, and 5 presentations to VTA Committees

Table 5 summarizes the Phase 1: Broad and Diverse Input engagement events and number of participants. The project team received input from over 700 total respondents in this phase. **Appendix I** provides additional information about who provided input by event type and specific demographic information.

Table 5: Phase 1: Broad and Diverse Input Engagement Events and Participants

Event Title	Number of Occurrences	Number of Participants
Pop-up Tabling Events	6	323
Virtual Community Meeting	1	23
Community Web Survey	1	>350
Local Jurisdiction Web Survey	1	14 respondents from 13 jurisdictions
CBO Focus Groups	2	16 participants representing 15 organizations
Local Jurisdiction Focus Groups	2	31 participants representing 15 of 16 local jurisdictions in Santa Clara County
Technical Advisory Group Meetings	2	33 participants in TAG #1; 31 participants in TAG #2
Explainer Videos	3	324 views of the VMT Project Introduction 346 views of "What is VMT and Why Does it Matter?" 218 views of "Why It's Important to Reduce VMT"
Stakeholder Interviews (conducted by SJSU students)	20	8 interviews with CBO representatives, 12 interviews with members of the public
Meetings with Individual Organizations and Jurisdictions	6	4 meetings with organizations or local jurisdictions, 2 meetings with local jurisdictions (2 to 3 representatives per call)
Information Item at VTA Committee meetings	5	Information item / presentation at September 2023 VTA Technical Advisory Committee (TAC), Citizens Advisory Committee (CAC), Bicycle & Pedestrian Advisory Committee (BPAC), Policy Advisory Committee (PAC), and Congestion Management Program & Planning Standing Committee (CMPP) meetings; Approximately 50 attendees
Total	**49**	**> 800**

Notes
1. Counts indicated in this table were collected in December 2023. Viewership numbers may have increased since that time.

Source: Fehr & Peers and VTA, 2024.

The callout box below presents images of some events conducted during Phase 1: Broad and Diverse Input engagement, and **Table 6** summarizes the materials and activities employed at each of the Phase 1: Broad and Diverse Input engagement events. All materials were designed to be accessible to a broad and diverse audience and in a manner that would garner informed, meaningful feedback. Engagement included a range of virtual and in-person meetings and pop-ups, group surveys, presentations followed by discussions and debriefs, and technical progress updates and discussions with the Technical Advisory Group.

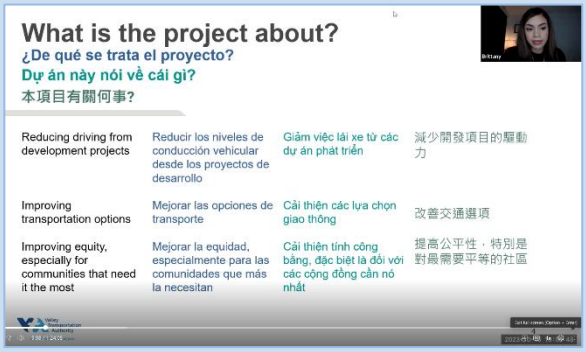
During Phase 1: Broad and Diverse Input, printed materials at pop-up events and at the virtual community meeting were made available in English, Spanish, Vietnamese, and Chinese; the Community Web Survey was available in 11 languages; and the project team had Spanish, Vietnamese, and/or Chinese interpreters at most public-facing events.

Phase 1: Broad and Diverse Input
Community Engagement Activities

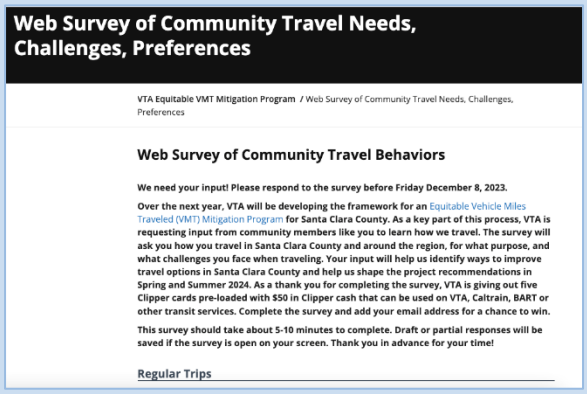
Pop-up at La Ofrenda Festival in Gilroy, 10/28/2023

Pop-up at Viva Calle SJ in San José Japantown, 9/10/2023

Sample of input exercises from pop-ups



Virtual Community Meeting, 10/16/2023



Phase 1: Broad and Diverse Input
Community Survey

Table 6: Phase 1: Broad and Diverse Input Engagement Activities and Materials

Event Title	Activities (Additional Languages Provided)	Materials (Additional Languages Provided)
Pop-up Tabling Events	Commute behavior and locations poster; VMT reduction strategies prioritization exercises; Web survey of community travel needs, challenges, and preferences (on request); *(Spanish and Chinese Mandarin interpreters at certain events)*	One-page flyers; Interactive poster boards; Paper copy of online survey *(All provided in English, Spanish, Vietnamese, and Chinese)*
Virtual Community Meeting	Virtual (Zoom-based) meeting; Introductory presentation; VMT reduction strategies prioritization exercise *(with Spanish, Vietnamese, and Chinese Mandarin interpreters)*	Presentation slide deck; Invitation flyers and agenda; Interactive virtual whiteboards *(All provided in English, Spanish, Vietnamese, and Chinese)*
Community Web Survey	Questions on travel behaviors, needs, challenges, and preferences for VMT reduction strategies	Online survey *(Available in 11 languages)*
Local Jurisdiction Web Survey	Questions on local jurisdiction VMT mitigation practices, needs, and preferences for VMT reduction strategies	Online survey
CBO Focus Groups	Virtual (Teams-based) meeting; Trust building exercise; Introductory presentation; Group discussion	Informational VMT videos (shared in advance); Presentation slide deck; Invitation flyers and agenda; Post-event surveys
Local Jurisdiction Focus Groups	Virtual (Teams-based) meeting; Introductory presentation; Group discussion	Pre-event survey; Presentation slide deck; Agenda
Technical Advisory Group (TAG) Meetings	Virtual (Teams-based) meeting; Introductory presentation; Group discussion	Presentation slide deck; Agenda
Explainer Videos	Videos on: VMT Project Introduction What is VMT and Why Does it Matter? Why It is Important to Reduce VMT	Online videos *(Captions professionally added in 4 languages, auto-translated in 100+ more)*
Stakeholder Interviews (conducted by SJSU students)	Mostly virtual and a few in-person interviews	Interview guide with outline of questions
Meetings with Individual Organizations and Jurisdictions	Presentation including project overview; discussion of travel needs and challenges; discussion of VMT reduction strategies	Presentation slide deck
Information Item at VTA Committee meetings	Presentation including project goal and objectives; equity approach; community engagement approach; next steps	Staff report; Presentation slide deck

Source: Fehr & Peers and VTA, 2024.

Phase 1: Broad and Diverse Input events generated over 730 pieces of feedback, identifying key community themes. Feedback ranged from project-relevant insights to general transportation comments, providing the broad input desired at this stage. At EPC and general community events, the project team explained the importance of reducing VMT and gathered input on transportation behaviors, challenges, needs, and effective VMT reduction strategies. Focus groups with jurisdiction representatives discussed current VMT mitigation practices and how a countywide program could address needs and challenges. TAG meetings facilitated high-level discussions on project status, research findings, feedback analysis, and recommended next steps. Detailed results are provided in the appendices.

VMT Reduction Categories

One of the most important areas of focus for Phase 1: Broad and Diverse Input engagement was identification of VMT mitigation strategies desired by the community, which would also provide VMT reduction across jurisdictional boundaries. The following categories of mitigation strategies were presented to each stakeholder group:

- **On Demand Mobility**: Carshare and rental car subsidies, bike- and scooter-share services, shared van services, implement or expand on-demand shuttle services.
- **Biking and Walking Paths**: Expanded pedestrian network, expanded bike network, improved street connectivity.
- **Many Things to Do Close By**: Increased residential density, increased job density, transit-oriented development, increased density of affordable and below market rate housing near transit, implementation of publicly accessible trip-end facilities (e.g., bike parking and supportive amenities), Housing Relocation-Subsidy Program (HRSP).[17]
- **Transit Improvements**: Implementation of transit-priority roadway treatments such as signal priority or dedicated lanes, provide bus rapid transit, increased network coverage, increased transit service frequency.
- **Transit, Bike, and Carpool Incentives**: Subsidized or free transit passes, subsidized or free passes for bike- and scooter-share services, subsidized or free passes for on-demand shuttles, e-bike subsidies, subsidized bike leasing, commute trip reduction (CTR) services (e.g., Guaranteed Ride Home Program).
- **Change Cost of Travel**: Unbundled parking from residential rent to dissuade new tenants from having and using personal automobiles, market priced on-street parking to deter people from using automobiles and/or to encourage “park-once” behavior,[18] reduced or free transit fares, express lane pricing.

[17] The Housing Relocation-Subsidy Program (HRSP) is a concept for VMT mitigation focused on reducing the housing cost differential between high accessibility areas and low accessibility areas. The HRSP would require a Lead Agency to fund grants, zero-interest loans, or monthly subsidies that would offset the housing cost differential for qualified candidates, enabling them to attain housing in high accessibility areas where more of their daily activities can be accomplished by walking, bicycling, or using transit.

[18] “Park-once” refers to the practice of parking in one place to then make stops on foot rather than driving from one destination to another within a given area or district. This behavior may be encouraged by implementing parking pricing schemes as well as developing a more pedestrian-friendly environment.

At pop-up events and the virtual community meeting, and in the community and local jurisdiction surveys, the project team asked, “Which VMT reduction strategies best solve your biggest transportation challenge?” **Table 7** presents the results of this question on the VMT reduction strategies.

Community respondents identified Frequent and Fast Transit Service, Biking and Walking Paths, and Many Things To Do Close By as the top three preferred VMT mitigation strategies. Younger community members were overrepresented in responses, and many already use transit. About half of the web survey respondents felt they needed a vehicle for daily needs. Travel speed, cost, and mode availability were important to respondents, who overall showed little interest in carshare and carpooling.

Local jurisdiction staff had different priorities for VMT mitigation. They identified Access to Vehicles, Mobility Services, and Transit, Bike, and Carpool Incentives[19] as the top three most useful[20] VMT reduction strategies. These options were chosen to address first-mile/last-mile service and transportation network gaps. Additionally, jurisdictions expressed interest in "return to source funding"[21] to offset political concerns about funding being sent outside the jurisdiction.

These results informed the types of projects incorporated into the next stages of the project and the final VMT mitigation program framework.

[19] In Phase 1 community engagement, the VMT reduction category names for each set of mitigation options presented to local jurisdictions differed slightly from those presented to the broader community. This report presents one reconciled set of category names to allow for the comparison of results between groups.

[20] “Useful” in this case can mean feasible to implement, relevant to your jurisdiction, and/or supported by other policies and planning efforts.

[21] “Return to source” in this case means some portion of the VMT mitigation funding paid by a new development is invested in the jurisdiction in which that development is located.

Table 7: Summary of Results: Which VMT Reduction Strategies Best Solve Your Biggest Transportation Challenge?

VMT Reduction Strategy	Pop-Ups[1]		Virtual Community Meeting[1]		Community Survey[1]		Local Jurisdic-tions[2]	
	Count	Percent	Count	Percent	Count	Percent	Weighted Value	Percent
On-Demand Mobility	26	6%	4	6%	42	6%	69	25%
Mobility Services	-	-	-	-	-	-	58	21%
Biking and Walking Paths	105	25%	17	25%	166	23%	32	11%
Many Things to do Close-by	78	18%	8	12%	156	21%	37	13%
Frequent and Fast Transit	118	28%	15	22%	256	35%	40	14%
Transit, Bike and Carpool Incentives	32	8%	7	10%	31	4%	45	16%
Change Travel Cost	45	10%	3	4%	59	8%	-	-
Other	21	5%	14	21%	18	3%	-	-
Total	**425**	**100%**	**68**	**100%**	**728**	**100%**	**281**	**100%**

Underlined text indicates most frequent or highest ranked responses.
Notes:
1. Respondents were asked to select their top two strategies. The results are based on the total number of votes.
2. Respondents were asked to rank these strategies from most useful to least useful. The results are shown as a weighted score based on ranking.

Source: Fehr & Peers, 2024.

3.2.1.2 Feedback Summary

Feedback received during Phase 1: Broad and Diverse Input informed the understanding of current community and local jurisdiction stakeholder baseline needs, challenges, and aspirations for the program. This content is integrated into **Chapter 2**, which summarizes existing conditions and the needs and challenges for local VMT mitigation practices and community travel. This feedback also directly influenced the identification of example VMT reduction projects and the selection and prioritization of VMT mitigation actions described in **Chapter 4**.

In addition to the summary discussed previously, responses from community members and CBOs were filled with numerous personal stories that convey the nuances behind individual transportation choices.

- *A woman shared a story about her daughter who is on the autism spectrum and is not able to drive. She takes the VTA bus to go to community college and wants to be independent, but it is a challenge. Comments (paraphrased): We need to do a better job of providing options for people like her who cannot drive, and also think about tackling climate change. We are an immigrant family, and my daughter thinks about us moving away from the United States to a place with more transit and walking-friendly cities.*
- *A meeting attendee stated that due to their mobility and vision limitations, they find it difficult at times to access fixed-route bus services. This includes difficulty crossing the street to access bus stops (often because the streets are very wide) and difficulty transferring between routes (often because the transfer points are not right at the intersection due to conflicting driveways, and because of the width of the streets). The attendee stated that improvements at the bus stop such as better seating, wider sidewalks, and crossing improvements at nearby intersections would make it much more feasible for them to take fixed-route transit, which they would like to do more often for flexibility.*
- *Several people expressed their wish for grocery stores closer to home. One couple does not drive at all, except to go to the grocery store. They wish there were stores closer that they could walk to; there is one somewhat nearby, but it is difficult to walk far holding groceries, so it needs to be closer to be within walking distance.*

3.2.2 Phase 2: Filter and Refine

Phase 2: Filter and Refine occurred in Spring 2024 with the aim of gathering feedback on the example VMT reduction projects, program structure, and Program Sponsor. Engagement was structured around two goals:

- Solicit specific input from the community and local jurisdictions on the three example VMT reduction projects.
- Gather input from local jurisdictions on the program structure and sponsor.

To encourage the participation of EPCs, the team worked with CBO partners and VTA staff to host four in-person workshops in EPC areas to draw attendees from these communities. Additionally, a virtual CBO workshop was held to hear directly from CBOs representing EPCs.

The project team used feedback from the Phase 2: Filter and Refine engagement to filter and refine recommendations for the program framework.

3.2.2.1 Summary of Engagement Events and Participants

The project team hosted the following events in Phase 2: Filter and Refine:

- 4 In-person workshops
- 1 Virtual community workshop
- 2 Pop-up tabling events
- 1 CBO focus workshop
- 1 Local jurisdiction workshop
- 1 VTA staff workshop
- Additional presentations to organizations, local jurisdictions, and VTA Committees, and VTA Board

Table 8 summarizes the Phase 2: Filter and Refine engagement events and number of participants. The project team received input from over 270 total participants in this phase, representing communities across the county. **Appendix J** provides additional details by event type.

Table 8: Phase 2: Filter and Refine Engagement Events and Participants

Event Title	Number of Occurrences	Total Number of Participants	Type of Participant
In-Person Community Workshops	4	85	Community members
Virtual Community Workshop	1	18	Community members
Pop-up Tabling at Community Events	2	30	Community members
CBO Workshop	1	14	Staff from 12 different organizations
Local Jurisdiction Workshop	1	21	Staff from 12 of 16 local jurisdictions (+Caltrans)
VTA Staff Workshop	1	13	Staff from 4 VTA divisions
Discussion Item at VTA Committee Meetings (March 2024 TAC, CAC, BPAC, PAC, and CMPP)	5	Approximately 50 attendees (6 public comments and 20+ Committee comments)	March 2024 TAC, CAC, BPAC, PAC, and CMPP attendees; Public Works and Planning Directors; community, business, labor, and bicycle/pedestrian advocates; City Councilmembers and County Supervisors
Meetings with Individual Organizations and Jurisdictions	9	Approximately 40	4 meetings with organizations; 5 meetings with cities (2 to 7 representatives per meeting)
Total	**1924**	**≥> 270**	

Notes:
1. As noted, two meetings were scheduled but had not yet occurred at the time of reporting.
Source: Fehr & Peers and VTA, 2024.

The callout box below shows images of a sampling of events conducted during Phase 2: Filter and Refine engagement, and **Table 9** summarizes the materials and activities from each of the Phase 2: Filter and Refine engagement events. All materials were designed to be accessible to each event's target audience in hopes of receiving informed, meaningful feedback. Engagement included a range of virtual and in-person workshops, presentations followed by discussions and debriefs, tabling at community events, and technical progress updates and discussions with members of the Technical Advisory Group.

During Phase 2: Filter and Refine, printed materials at in-person workshops and virtual community meeting materials were made available in English, Spanish, Vietnamese, and Chinese, and interpretation was provided at public-facing events in Spanish, Vietnamese, and/or Mandarin. Additionally, two in-person workshops were co-hosted by community-based organizations that presented and facilitated discussions primarily in Spanish.

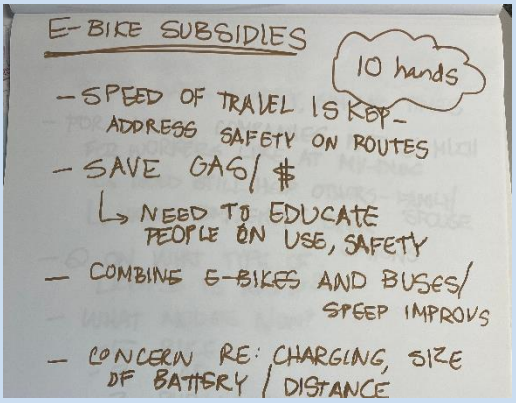
Phase 2: Filter and Refine Community Engagement Activities

Virtual Community Workshop, 5/30/2024

Spanish-first workshop with Nueva Vida Community in Gilroy, 7/11/2024

SV Youth Climate Action Summit in Cupertino, 8/3/2024

McKinley-Bonita National Night Out event in San José, 8/6/2024



Sample of input from in-person workshops

Table 9: Phase 2: Filter and Refine Engagement Activities and Materials

Event Title	Activities (Additional Languages Provided)	Materials (Additional Languages Provided)
In-Person Community Workshops	In-person meeting; Introductory presentation; Example VMT reduction projects breakout discussion exercise *(One workshop with Spanish and Vietnamese interpreters, one with Spanish interpreters, and two facilitated primarily in Spanish)*	Presentation slide deck; *(provided in English, Spanish, Mandarin, and Vietnamese)*; Interpreters *(Spanish and Vietnamese)*; Invitation flyers and agenda *(All provided in English, and Spanish, Mandarin, and Vietnamese)*; Easel notepads/markers
Virtual Community Workshop	Virtual (Zoom-based) meeting; Introductory presentation; Example VMT reduction projects breakout discussion exercise *(with Spanish, Vietnamese, and Mandarin interpreters)*	Presentation slide deck; Invitation flyers and agenda; *(All provided in English, Spanish, Mandarin, and Vietnamese)*
Pop-Up Tabling Events	Brief verbal overview of project; Example VMT reduction projects poster with voting exercise *(Spanish interpreter at one event)*	Half-page flyers; Interactive poster board; *(All provided in English and Spanish)*
CBO Staff Workshop	Virtual (Zoom-based) meeting; Introductory presentation; Example VMT reduction projects breakout discussion exercise	Informational VMT videos (shared in advance); Presentation slide deck; Informational VMT videos; Agenda; Post-event survey
Local Jurisdiction Staff Workshop	Virtual (Teams-based) meeting; Introductory presentation; Group discussion on example VMT reduction projects, program structure, and Program Sponsor (via Mural interactive whiteboard activity)	Read-Ahead Memorandum; Presentation slide deck; Mural interactive board; Agenda
VTA Staff Workshop	Virtual (Teams-based) meeting; Introductory presentation; Group discussion on example VMT reduction projects, program structure, and Program Sponsor (via Mural interactive whiteboard activity)	Read-Ahead Memorandum; Presentation slide deck; Mural interactive board; Agenda
Discussion Item at VTA Committee Meetings	Presentation including project goal and objectives; summary of Phase 1: Broad and Diverse Input engagement; example VMT reduction projects; questions for discussion	Staff report; Presentation slide deck
Meetings with Individual Organizations and Jurisdictions	Spanish-first workshops; pop-up events; one-on-one meetings with staff at local jurisdictions; Introductory presentation; discussion of example VMT reduction projects breakout discussion exercise	Presentation slide deck

Source: Fehr & Peers and VTA, 2024.

3.2.2.2 Feedback Summary

Phase 2: Filter and Refine was successful in gathering specific feedback about the opportunities and challenges of the example VMT mitigation actions as well as the program structure and sponsor. At EPC and community-oriented events, the project team described the example VMT reduction mitigation actions to learn how these could be useful to community members and if they could be improved. Workshops with VTA staff and local jurisdiction staff centered on the same example VMT reduction projects but expanded into topics of program structure and program sponsor. Additional details are provided below with event-based summaries provided in **Appendix J**.

Example VMT Mitigation Actions

At each outreach event, the project team shared details about three example VMT mitigation actions projects, asked the participants if these projects would be useful to their community, and how they thought the project team could improve them. Additional details about the VMT mitigation actions are provided in **Chapter 4 and 5**.

Bus Speed Improvements

The VTA High-Capacity Transit Study (2024) proposes a network of VTA bus transit corridors prioritized for speed, frequency, and reliability improvements in the coming years (see **Figure 8**). One or more VMT mitigation actions could consist of bus speed improvements to this countywide network. One example is the King Road Transit Speed and Reliability Improvements, a mitigation action that would fund the installation of side-running dedicated bus lanes and bus boarding islands on King Road, from Mabury Road to Capitol Expressway.[22] It is assumed this action would serve all 40 bus stops.

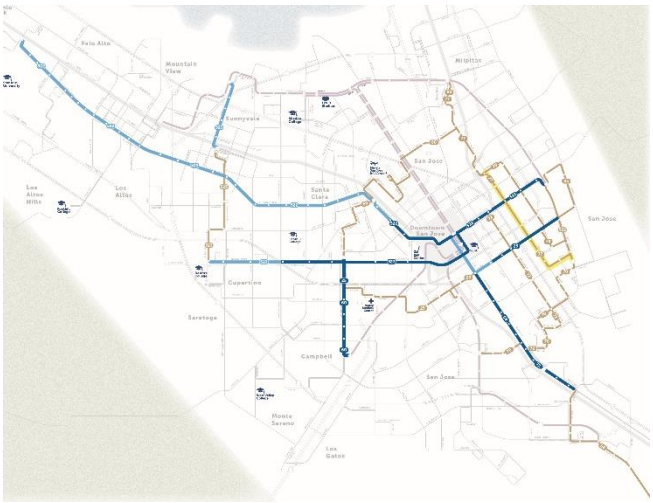


Figure 8: High-Capacity Transit Corridors

[22] This example VMT mitigation action was identified based on its inclusion in the VTA High-Capacity Transit Study in 2023-2024. The City of San José has explored similar bus lane and boarding island improvements through its King Road Complete Streets project. As of Fall 2024, in response to community feedback and equity analysis, the City is considering bus lanes along portions of King Road, but not the entire segment between Mabury Road and Capitol Expressway. Any Bus Speed Improvements VMT mitigation action included in a future VMT mitigation program would be defined at that time, accounting for community input and equity and feasibility considerations.

E-Bike Subsidies

This mitigation action would enhance access to e-bikes by offering financial assistance, in the form of incentives to reduce the cost to Santa Clara County residents of purchasing personal e-bikes for Santa Clara County residents. Subsidies would be means-based (i.e., provide a greater subsidy to lower-income households and residents of equity community areas). The program would expand the reach of current and planned e-bike subsidy programs which are limited geographically or in terms of budget. See **Figure 9** for areas that would benefit most from this project.

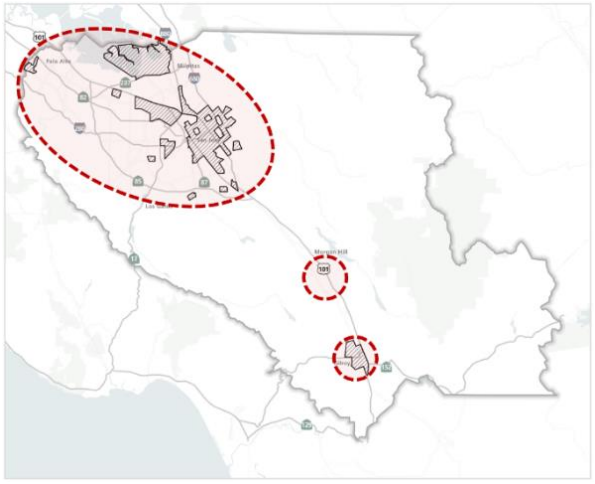


Figure 9: E-bike Subsidy Mitigation Action Extent

Enhanced Vanpools

Community members and local jurisdictions expressed a need to expand transit service to facilitate connections between places currently not well served by transit. One way to do this is to provide microtransit or vanpools to supplement fixed-route transit service. This VMT mitigation action would subsidize vanpools for non-office and service workers—more likely to be members of equity communities—who live or work in Santa Clara County. This action would extend existing regional vanpool subsidy programs to cover the full lease cost.[23] See **Figure 10** for sample areas that would benefit most.

Figure 10: Enhanced Vanpool Mitigation Action Extent

[23] The current concept for expanded vanpool is that, unlike the MTC regional program and VTA supplemental subsidy, it would subsidize the full lease cost. This would include the vehicle, maintenance, roadside assistance, insurance and physical damage protection. The main out-of-pocket cost remaining would be fuel.

Overall Feedback

There was general support for all three example VMT mitigation actions, but the level of support, type of concerns, and suggestions for making the projects as useful and equitable as possible varied by VMT mitigation action. Feedback included ideas about the project features that could further reduce VMT as well as feedback to better meet community needs. Additional details about considerations for the example VMT mitigation actions are included in **Chapter 4 and 5**. Feedback generally centered around reducing barriers to access and ensuring affordability. Reducing barriers to access could vary by VMT reduction project type but may include partnering with CBOs, employers, or other local organizations and institutions to help with applications, purchasing, access, education, logistics, and general marketing and awareness. Furthermore, materials related to the projects should be provided in multiple languages and formats to ensure access for all ages and abilities. To ensure affordability, the community indicated that VMT mitigation actions should include subsidies for deep discounts or fare exemptions for use by multiple members of a household and consider discounted transit fares as a complementary action. For e-bike subsidies, the community emphasized that the subsidy should be in the form of a voucher and cover the full cost of a mid-range e-bike including a helmet.

To equitably implement these VMT mitigation actions, projects should be focused on EPC populations and within EPC geographies. For the bus speed improvements project, this may include prioritizing routes used by EPC populations. For the e-bike subsidies and enhanced vanpool actions this may include prioritizing marketing toward CBOs, at transit hubs and major routes, and applicable employers serving shift and service workers. To better serve EPC populations, the appropriate infrastructure should be evaluated to ensure the relevant facilities adequately accommodate the VMT mitigation action. This may include improving bike facilities on streets, increasing bike parking and charging options, and addressing e-bike use laws; improving transit access and frequency; and addressing vanpool parking demand needs. Furthermore, all capital projects should incorporate universal street design to accommodate people with disabilities, people with limited English proficiency (LEP), youth, and seniors. All programs and services should ensure equitable access with promotional materials that reach people with disabilities, people with limited English proficiency (LEP), youth, and seniors.

Program Structure

In addition to the example VMT mitigation actions, the project team asked participants at the VTA staff workshop and local jurisdiction staff workshops to offer input on the Program Sponsor and program structure. A VMT mitigation program can be structured in various ways, depending on the mitigation actions funded and administrative preferences.

VTA staff and local jurisdiction staff were presented with three program structure options discussed in **Chapter 1**: VMT bank, VMT exchange, or VMT-based impact fee. The project team evaluated these three program structure options and identified the relative pros and cons

for local jurisdiction stakeholders and VTA staff during Phase 2: Filter and Refine engagement. These are presented in **Table 10**.

Table 10: Pros and Cons of VMT Program Types

VMT-Based Impact Fee	VMT Exchange	VMT Bank
✓ Easy to understand	✓ Flexible	✓ Flexible
✓ Modest administrative burden (many agencies are already familiar with administering impact fee programs)	✓ Moderate administrative burden (less than a Bank)	✓ Can split funding between applicants
✓ Funds tangible improvements	✓ Legally can fund programs and operations	✓ Legally can fund programs and operations
— Can only be used toward capital improvements	— Applicants must fund an entire mitigation action	— High administrative burden
	— First-in problem; the most cost-effective measures will be funded first	

Notes:
Pros are denoted with a check mark (✓) and cons with a dash (—).
Source: Fehr & Peers, 2024.

In addition to this comparison, the team presented a draft recommendation to initiate the program as a VMT exchange because this structure would offer the flexibility to deliver a wide range of VMT reduction project types with a relatively modest upfront administrative burden.

At both workshops, the VMT bank and exchange options ranked closely, but VTA staff ranked a bank slightly higher, and local jurisdiction staff ranked an exchange slightly higher, as shown in **Table 11**. At both workshops, a bank and exchange were very close in ranking, but VTA staff ranked a bank slightly higher and local jurisdiction staff ranked an exchange slightly higher.

Table 11: Program Structure

Rank	VTA Results[1]	Local Jurisdiction Results[2]
1	Bank	Exchange (23 points)
2	Exchange	Bank (22 points)
3	Fee	Fee (16 points)

Notes:
1. Since the VTA workshop was made up of VTA staff from a variety of departments and roles across the agency, quantifying the ranking with scores was not appropriate; however, a general desirability ranking was included.
2. Each jurisdiction present at the workshop was assigned one vote and the project team quantified the vote rankings with higher scores representing a more desirable option.

Fehr & Peers, 2024.

VTA staff provided additional feedback on how a VMT bank would best support program objectives:

- A bank allows the funding to go to larger projects funded by many developers over time. This can be preferable to one developer needing to fully fund a mitigation action.
- Exchange and bank options ranked similarly with a slight preference for the latter. Respondents favored starting with an exchange and switching to a bank later in the program life.

Local jurisdiction staff considered how a VMT bank would enable the program to include VMT mitigation actions meeting smaller jurisdiction needs while issuing a general note of caution regarding administration and oversight needs:

- An exchange could accommodate a wide range of projects which would help support smaller cities in addressing VMT mitigation at a larger scale.
- Many participants supported possible evolution shifting to a bank structure in the long term to allow for a broader set of VMT reduction projects. A bank could better meet the needs of smaller development projects rather than requiring projects to fund an expensive entire VMT reduction project that might not be scaled to their need.
- It remains to be seen how projects VMT mitigation actions can be scaled to suit applicants' demand ('fair share') for mitigation.
- Communicating the program structure, jurisdictions' role, and applicants' responsibilities will be challenging. A brochure explaining how the exchange will work would benefit developers and decision-makers.

Overall, the two stakeholder groups aligned on starting with an exchange structure and switching to a bank later in the program life. Based on legal requirements, and according to precedent programs, an exchange can accommodate a range of projects, such as street improvements, incentive programs, and operational services. Stakeholders indicated having a structure that could accommodate such a range of actions would support smaller cities by addressing VMT mitigation countywide rather than location specific. Long-term, a bank may be preferable as it enables a wider range of VMT reduction projects and pooling of mitigation funds to pay for larger projects.

Stakeholders also aligned on the need for the program to be compelling and demonstrate proof-of-concept quickly to garner support and buy-in from county local jurisdictions and developers. A VMT bank requires the Administering Agency to equate VMT mitigation to credits and to take on the responsibility for defining and implementing a VMT verification and monitoring procedure, which is technically challenging and time consuming. This makes a VMT bank harder to implement quickly, which conflicts with the need for a prompt start to the VMT mitigation program. Again, these considerations favor starting with a VMT exchange.

Program Sponsor

The project team also asked participants at the VTA staff workshop and local jurisdiction staff workshops to offer input on the Program Sponsor. Participants were prompted to rank four Program Sponsor options—VTA, a Joint Powers Board, a new agency, or a private agency—from most to least desirable and provided input on their rationale. **Table 12** shows the rankings for Program Sponsor which indicates there was overwhelming support from VTA staff and local jurisdiction staff for VTA to serve as the sponsor of a potential future program.

Table 12: Feedback about Program Sponsor

Rank	VTA Results	Local Jurisdiction Results
1	VTA	VTA (40 points)
2	Joint Powers Board	Joint Powers Board (23 points)
3	New Agency	New Agency (18 points)
4	Private Agency	Private Agency (14.5 points)

Notes:
1. Since the VTA workshop was made up of VTA staff, quantifying the ranking with scores was not appropriate; however, a general desirability ranking was included.
2. For the local jurisdiction feedback, each jurisdiction present at the workshop was assigned one vote and the project team quantified the vote rankings with higher scores representing a more desirable option.

Fehr & Peers, 2024.

In addition to the rankings, VTA and local jurisdiction staff shared feedback about how they ranked the Program Sponsor options and provided reasoning for why they thought VTA was the most desirable Program Sponsor.

VTA staff considered how their organization is suited to administer a potential future VMT mitigation program and what would be the political implications of VTA as the Program Sponsor might be, and provided the following rationale:

- VTA is a congestion management agency (CMA), a countywide organization, and responsible for delivering capital improvements and programming countywide.
- VTA could have fewer administrative costs given its existing apparatus role and organizational structure including as a CMA functions.
- While the VTA is potentially well suited to administer this type of program, there would be costs associated with administration. Before serving as Program Sponsor, VTA would need to better understand and consider these cost and staffing implications.

Local jurisdiction staff discussed how VTA service as the Program Sponsor of a potential future VMT mitigation program would affect different jurisdictions and the countywide perspective that VTA holds, providing the following rationale:

- VTA as a CMA has countywide responsibilities and could be set up to administer this type of program with relative ease.

- VTA has is likely to have the staff expertise and coordinating capacity to take on this program.
- Having VTA serve as the Program Sponsor would relieve local jurisdictions of a burdensome activity.
- There would still be a need for transparent oversight separate from VTA, and a need to balance mitigation actions and funding distribution across the county.

3.2.3 Phase 3: Confirm

Phase 3: Confirm will provide an opportunity for feedback on the draft report which reflects the cumulative input collected from the community on needs and example VMT mitigation actions, with program structure, sponsor and administrative details informed by local jurisdiction and VTA staff insights. A streamlined and accessible Fact Sheet will be presented to the general public, decision-makers, the TAG, CBOs, and other stakeholders to allow opportunities for feedback and input. This Fact Sheet will supplement the already available videos and other materials presented during prior stages of community engagement.

3.2.3.1 Summary of Engagement Events and Participants

The project team will host the following events as part of Phase 3: Confirm:

- 1 Virtual community meeting
- 1 Virtual VTA event
- Discussion Item at 5 VTA Committee meetings
- (##) Meetings with individual organizations and jurisdictions

Table 13 summarizes the Phase 3: Confirm engagement events and number of participants. **Appendix K** provides additional information about who provided input by event type and specific demographic information.

Table 13: Phase 3: Confirm Engagement Events and Participants

Event Title	Number of Occurrences	Number of Participants	Type of Participant
Virtual Community Meeting	1	TBD	Community members
Virtual Ask VTA Event	1	TBD	Community members
Discussion Item at VTA Committee Meetings (November 2024 TAC, CAC, BPAC, PAC, and CMPP)	5	TBD	Public Works and Planning Directors; community, business, labor, and bicycle/pedestrian advocates; City Councilmembers and County Supervisors
Meetings with Individual Organizations and Jurisdictions	TBD	TBD	## meetings with organizations, ## meetings with local jurisdictions (## representatives per meeting)
Total	**TBD**	**TBD**	

Source: Fehr & Peers and VTA, 2024.

Table 14 summarizes the materials and activities employed at each of the Phase 3: Confirm engagement events. All materials were designed to be accessible to the corresponding stakeholder group in a manner that would garner informed, meaningful feedback. The presentation slide deck for the Virtual Community Meeting and the project Fact Sheet were made available in English, Spanish, Vietnamese and Chinese. Spanish, Vietnamese, and Mandarin interpreters were provided at the Virtual Community Meeting.

[Table is SUBJECT TO CHANGE]

Table 14: Phase 3: Confirm Engagement Activities and Materials

Event Title	Activities (Additional Languages Provided)	Materials (Additional Languages Provided)
Virtual Community Meeting	Virtual (Zoom-based) meeting; Introductory presentation; with summary of travel needs and challenges; summary of example VMT mitigation actions and input received; next steps; Question & Comment period *(with Spanish, Vietnamese, and Mandarin interpreters)*	Presentation slide deck; Invitation flyers and agenda; Fact Sheet Interactive virtual whiteboards *(All provided in English, Spanish, Vietnamese and Chinese)*
Virtual VTA Event	Virtual (Zoom-based) meeting; Overview presentation; Extended Question & Comment period	Presentation slide deck; Fact Sheet
Discussion Item at VTA Committee Meetings	Presentation including project overview; summary of example VMT mitigation actions and input received; summary of program structure and sponsor and input received; next steps; Questions for discussion	Staff report; Presentation slide deck; Fact Sheet; Public Draft Report
Meetings with Individual Organizations and Jurisdictions	Presentation including project overview; discussion of travel needs and challenges; discussion of example VMT mitigation actions and input received; summary of program structure and sponsor and input received; next steps	Presentation slide deck; Fact Sheet

Source: Fehr & Peers and VTA, 2024.

3.2.3.2 Summary of Participation Feedback

[INSERT SUMMARY UPON COMPLETION OF PHASE 3]

3.3 Technical Advisory Group

A Technical Advisory Group (TAG) was created by the VTA to solicit representatives' feedback on the draft VMT mitigation program framework and options, with respect to the interests and goals of the represented agencies. TAG stakeholder members included transportation and planning staff from local jurisdictions, Caltrans and MTC; SJSU / MTI researchers attended some TAG meetings along with researchers and decision-makers. Not all TAG members were expected to attend every meeting; instead, the goal was to attract a representative cross-section of county technical stakeholders to participate in this process. **Table 15** presents agency representation at TAG meetings. **Appendix L** presents the list of TAG members.

Table 15: Technical Advisory Group Participation Summary

Agency	Meeting					
	8/14/23	11/13/23	2/12/24	5/3/2024	8/12/24	Dec Fall 2024
Campbell	●	●	●	●		TBD
Cupertino	●	●	●	●	●	TBD
Gilroy	●	●	●	●	●	TBD
Los Altos	●	●	●	●	●	TBD
Los Altos Hills	--	--	--	--	--	TBD
Los Gatos	●	●	●	●	●	TBD
Milpitas	●	●	●	●	●	TBD
Monte Sereno	--	--	--	--	--	TBD
Morgan Hill	●	●	●	●	●	TBD
Mountain View	●	●	●	●	●	TBD
Palo Alto	●	--	●	●	●	TBD
San Jose	●	●	●	●	●	TBD
Santa Clara	●	●	●	--	●	TBD
Saratoga	--	●	--	--	--	TBD
Sunnyvale	●	●	●	●	●	TBD
Santa Clara County	●	●	●	●	●	TBD
Caltrans	●	●	●	●	●	TBD
MTC	●	--	●	--	●	TBD

Notes:
● Indicates one or more representatives of this agency attended the TAG meeting.
-- Indicates no representative of this agency attended the TAG meeting.
TAG Meeting #4 on May 3, 2024 was held as a Phase 2: Filter and Refine Local Jurisdiction Staff Workshop.
Source: Fehr & Peers, 2024.

3.3.1 Summary of Engagement Process

The TAG received technical milestone and outreach updates and provided guidance and advice on decisions throughout the project, supplementing the engagement activities targeted at the broader community, CBOs and other and/or agency stakeholders. TAG meetings were led by VTA with Fehr & Peers presenting technical content. Each TAG meeting was structured with discussion items and interactive activities to encourage participation from members and sessions were used for deep-dive discussions to give everyone an opportunity to provide input. **Table 16** presents a summary of presentation and discussion topics addressed in each meeting.

Table 16: TAG Meeting Presentation and Discussion Topics

Agency	Presentation and Discussion Topics
Meeting 1 – 8/14/23	Project Overview – overall structure, team, work with SJSU/MTI URBP 236 class; Discussion – Project Goal and Objectives; Preview of Equity Framework / Definitions; Discussion – Draft Engagement Plan Next Steps and Items for Review
Meeting 2 – 11/13/23	Update on Phase 1: Broad and Diverse Input Community Engagement; Update on Mineta / SJSU Class Efforts; Discussion – Local Jurisdiction Survey Results; Discussion – Potential VMT Reduction Needed; Next Steps
Meeting 3 – 2/12/24	Summary of Phase 1: Broad and Diverse Input Engagement; Highlights of Mineta / SJSU Class Efforts; VMT Reduction Measure Prioritization Approach; Phase 2: Filter and Refine Engagement Approach; Schedule Update and Next Steps
Meeting 4 – 5/3/24 *(held as Phase 2: Filter and Refine Local Jurisdiction Staff Workshop)*	Introductory presentation; Group discussion on example VMT reduction projects, program structure, and Program Sponsor (via Mural interactive whiteboard activity)
Meeting 5 – 8/12/24	Summary of Phase 2: Filter and Refine Engagement; Implementation Considerations; Schedule Updates and Next Steps
Meeting 6 - TBD	Summary of recommended program framework including example VMT mitigation actions, program structure, and Program Sponsor; Summary of Phase 3: Confirm Engagement to date; Next Steps [SUBJECT TO CHANGE - CONFIRM UPON COMPLETION OF PHASE 3]

Note: Introductions, and procedural agenda items are not listed above.
Source: Fehr & Peers, 2024.

3.3.2 Summary of Participation Feedback

TAG meetings garnered broad attendance from Santa Clara County agencies and jurisdictions as well as Caltrans and MTC. Each meeting included representation from at least 13 of these agencies. Discussion was robust and informed revisions that clarified and improved project outcomes as follows:

- TAG #1 included an informational presentation on the broad strokes of project goals and objectives, equity definitions, and the engagement plan. Discussion focused on precedent for regional VMT mitigation programs, equity framework structure and referenced equity community definitions, and feedback on the engagement plan.
- TAG #2 included an informational presentation on the result of Phase 1: Broad and Diverse Input engagement completed to date, MTI/SJSU contributions, and local jurisdiction survey results. Discussion focused on survey results, specifically VMT

reduction category rankings, the role of microtransit as VMT reduction, and VMT monitoring.

- TAG #3 included an informational presentation on the outcomes of Phase 1: Broad and Diverse Input engagement, highlights from the MTI/SJSU research, the VMT reduction prioritization approach, and Phase 2: Filter and Refine engagement approach. Discussion focused on exploration of MTI/SJSU findings, clarification of VMT reduction category ranking and related community input, how results translate to next steps for identifying sample projects within the categories, and the geographic spread of Phase 2: Filter and Refine community engagement events.
- TAG #4 was held as a Phase 2: Filter and Regine Local Jurisdiction Staff Workshop and included an introductory presentation with a summary of Phase 1: Broad and Diverse Input engagement input; how the project team developed the example VMT reduction projects and VMT mitigation actions; and VMT mitigation program structure and sponsor options. The group used Mural interactive whiteboards to offer comments and questions on the example VMT mitigation actions, and to rank their preferred program structure and sponsor options.
- TAG #5 included an informational presentation on the results of the Phase 2: Filter and Refine engagement and implementation considerations. Discussion focused on the program structure and sponsor, future considerations, and next steps.
- TAG #6 [INSERT SUMMARY UPON COMPLETION OF PHASE 3]

3.4 VTA Committee and Board Review Process

VTA staff has made an effort to regularly share information about the Equitable VMT Mitigation Program Framework with VTA Committees, and to solicit feedback from Committee members. This has included the following efforts:

- **January 2022 – Information item on "Update on SB 743 LOS-to-VMT Transition":** Presented to VTA Technical Advisory Committee (TAC), Citizens Advisory Committee (CAC), Bicycle & Pedestrian Advisory Committee (BPAC), Policy Advisory Committee (PAC) and Congestion Management Program & Planning Standing Committee (CMPP). As part of this item, VTA staff discussed the efforts VTA and local jurisdictions were planning to strengthen VMT mitigation measures and mentioned the Caltrans grant application staff submitted in Fall 2021. Committee members offered comments and questions about the use of VMT in land use project analysis and thoughts on VMT mitigation.
- **September 2023 – Information item on "Equitable VMT Mitigation Program for Santa Clara County: Project Introduction":** Presented to VTA TAC, CAC, BPAC, PAC and CMPP. In this item, VTA staff introduced the project, discussed the project goal and objectives, shared an overview of the project equity approach, and gave a preview of Phase 1: Broad and Diverse Input community engagement. Committee members offered comments and questions about what kinds of transportation improvements a program could fund, thoughts on ways to incorporate equity, and suggestions for stakeholders the project team should engage.

- **March 2024 – Discussion item on "Equitable VMT Mitigation Program for Santa Clara County: Project Update":** Presented to the VTA TAC, CAC, BPAC, PAC and CMPP. In this item, VTA staff provided an update on the project, summarized the events and feedback from Phase 1: Broad and Diverse Input community engagement, provided highlights of ongoing technical analysis, and gave a preview of Phase 2: Filter and Refine engagement. Committee members offered comments and questions about what kinds of transportation improvements a program could fund, thoughts on how measures could be prioritized and where VMT reductions should be focused, and suggestions for stakeholders the project team should engage. In addition, six public comments were offered across the various meetings.
- **November 2024 – Discussion item on "Equitable VMT Mitigation: Draft Program Framework":** Staff plans to present this item to the VTA TAC, CAC, BPAC, PAC and CMPP during Phase 3: Confirm engagement. In this item, VTA staff will provide an update on the project, summarize the example VMT mitigation actions and input received, recommended program structure and sponsor and input received; next steps; and questions for discussion. INSERT SUMMARY UPON COMPLETION OF PHASE 3]

VTA staff has also provided periodic brief updates on the project through the Committee Staff Report at meetings, particularly during Phase 1: Broad and Diverse Input and Phase 2: Filter and Refine engagement.

VTA staff plans to bring another Discussion item with the draft recommendations to VTA Committees and the Board of Directors in Fall 2024. In early 2025, VTA staff plans to bring an Action item to VTA Committees and the Board to review and accept the project's final recommendations and report (recommended program framework).

Chapter 4: VMT Mitigation Action Selection Feedback and Considerations

This chapter describes the selection process for example VMT mitigation actions to be included in an Equitable VMT Mitigation Program for Santa Clara County. This chapter has two main sections:

- The first section discusses the process the project team piloted to select the example VMT mitigation actions presented in the Phase 2: Filter and Refine engagement. This selection process balances a range of technical and practical considerations. The actions presented in this section are intended as a starting point for a potential implementation phase. Ultimately, implementation may include some or all of these actions, or include new actions identified via use of the selection process described in this chapter.
- The second section discusses how VMT mitigation actions would be selected during a potential implementation phase and operation of a future program. Once a VMT mitigation program is up and running, the VMT Mitigation Action Review Team advising that program will likely undertake a selection process similar to that used for this program framework to determine additional measures to include in the program. The concluding sections of this chapter present a discussion of additional supportive actions, stakeholder feedback on the three VMT mitigation action categories, and additional equity considerations for the VMT mitigation action selection.

4.1 Selection Process for Example VMT Mitigation Actions

The process of selecting example VMT mitigation actions was designed to distill the vast universe of potential transportation improvement opportunities into a small subset of example actions that align with the goals and objectives of this VMT mitigation program. The selection process was designed to address a range of technical and practical considerations, and to address the CEQA requirement that conclusions about the effectiveness of mitigation must be supported by substantial evidence. The process considers issues such as the magnitude of VMT reduction each action could generate and where, the ease with which it could be implemented, its ability to be scaled up or down to match available funding, the level of support from stakeholders and the local community, and other considerations. This process is presented in **Figure 11** and discussed on the following pages.

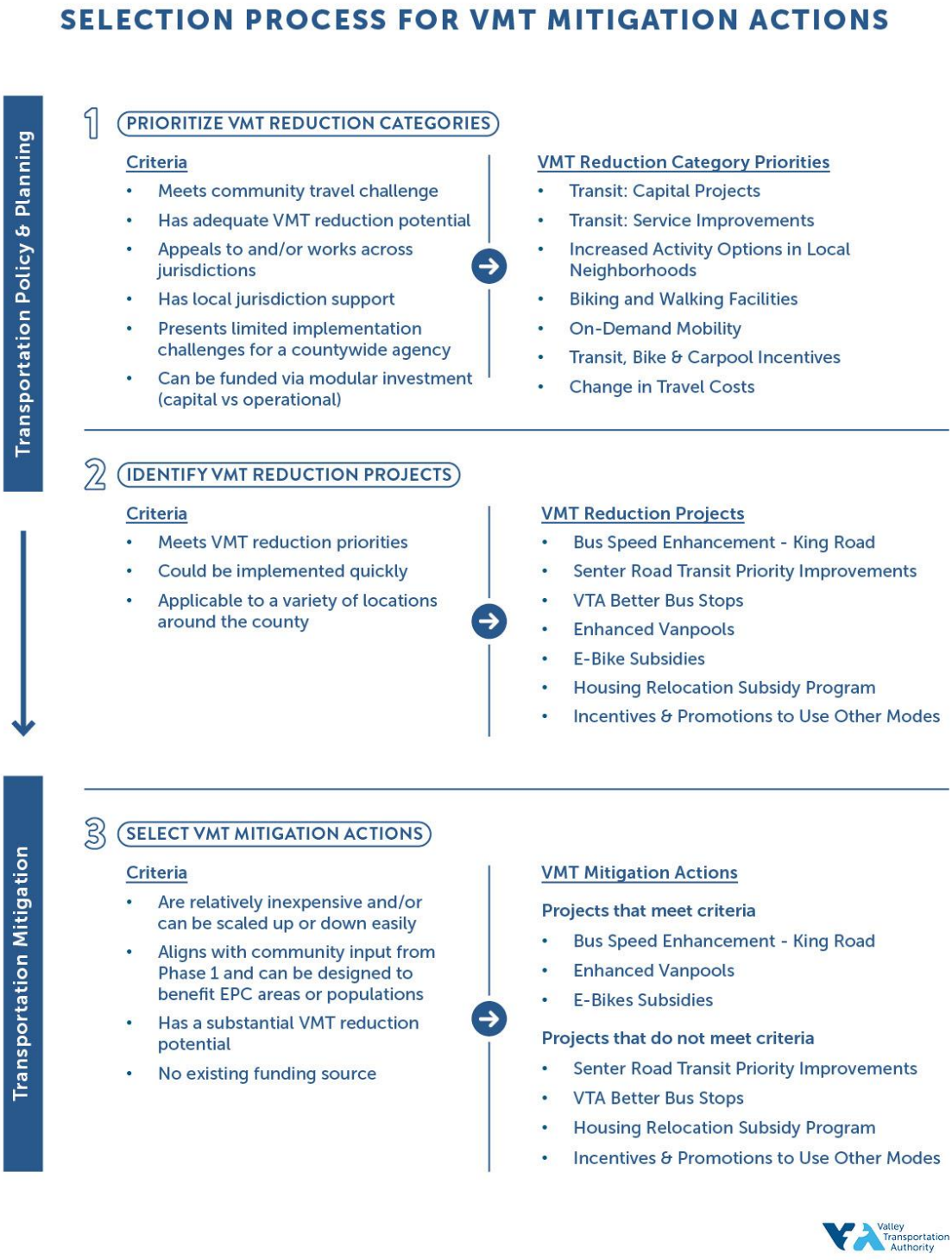


Figure 11: Selection Process for the Example VMT Mitigation Actions

4.1.1 Prioritize VMT Reduction Categories

The project team prepared a detailed evaluation matrix for a wide range of representative projects under each of the seven VMT reduction categories presented in **Table 18** under VMT reduction category priorities.

This matrix addressed attributes such as VMT reduction potential, alignment with the Equity Framework, cost, and other considerations.

In preparing this matrix, the review team cited the latest VMT reduction research, including sources like the California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA, 2021), as well as other existing literature and case studies. The matrix also incorporated community feedback from Phase 1: Broad and Diverse Input engagement.

The specific considerations for each VMT reduction category are listed below:

4.1.1.1 Evaluation Matrix Overview

- **VMT Reduction Category Names:** Category name for VMT reduction measure.
- **Representative VMT Reduction Measures:** Set of representative VMT reduction measures included in each category.
- **Category Maximum VMT Reduction (Plan/Community Level):** The maximum VMT or GHG emissions reduction percentage associated with each category for the Plan/Community scale. This value is given for the category as a whole, based on CAPCOA documentation for transportation measures.
- **VMT Type (Commute vs Total VMT):** The type of VMT that can be reduced by the measure. Two options are provided: Commute (employment-based) VMT and Total VMT generated by all activity areawide.
- **VMT Reduction Application (New VMT vs All City VMT):** The subset of future VMT which the measure could help mitigate. Options provided are New VMT (only VMT from new development) and All City VMT (all existing and future VMT areawide).[24]

4.1.1.2 Supporting Information

- **Literature Evidence (References):** Citation from CAPCOA indicating where to find further information about the evidence supporting specified VMT reductions. This is provided for each of the representative VMT reduction measures.
- **VMT Reduction Range (Per Measure):** The range of VMT that could be reduced with the implementation of each category's representative VMT reduction measures. This is based on CAPCOA 2021 documentation.

[24] VMT mitigation actions can reduce existing or future VMT; however, the amount of VMT reduction would need to be roughly proportional to the VMT reduction needed by the VMT impact of the new development.

- **Projects/Plans in Santa Clara County:** VTA Projects around Santa Clara County, whether proposed by VTA or local jurisdictions, which are similar to the representative VMT reduction measures for each category. These are cited as examples of capital and operational projects that could be incorporated into a future VMT mitigation program. The source for these projects is the set of plan and policy documents compiled and provided by the VTA in mid-2023, representing samples of proposed transportation improvements that are not yet funded.
- **Cost Range (Low ($) to High ($$$)):** Relative cost estimate for implementation of each category's VMT reduction measures. These are provided for planning purposes and categorized as Low ($), Medium ($$), or High ($$$) and are based on planning/engineering judgement as well as the Cost Considerations information provided in CAPCOA.
- **Project Cost (Total Cost, Examples):** VMT reduction project cost estimates provided for specific VTA and non-VTA projects. These costs are currently presented in two forms—total project cost and cost per VMT, depending on data available. Note: as more information becomes available, this content can be provided in the form of cost ($) per VMT reduced.
- **Equity Framework Consistency:** Summary of considerations regarding the equity implications of implementing each VMT reduction category. This is based on planning/engineering judgment, local and regional knowledge about VMT generation within Santa Clara County, and research information provided in CAPCOA.
- **Feasibility Considerations:** Summary of considerations regarding the feasibility of implementing each VMT reduction category generally and within the Santa Clara County (i.e., VTA) context. This is based on planning/engineering judgment, local and regional knowledge about Santa Clara County and local and regional agencies, and implementation recommendations provided in CAPCOA.

The illustrative matrix developed by the project team is included as **Appendix M**.

4.1.1.3 VMT Reduction Category Prioritization

Using the VMT reduction category matrix, the project team prioritized categories based on how well they aligned with program objectives. The weighting used for this task is presented in **Table 17**.

Table 17: VMT Reduction Category Criteria Scoring

Criteria (i.e., "The VMT Reduction Category…"	Points (Weight)[1]
Meets a community travel challenge[2]	4 (29%)
Has adequate VMT reduction potential	3 (21%)
Appeals to and/or works across jurisdictions	2 (14%)
Has local jurisdiction support	2 (14%)
Presents limited implementation challenges for a countywide agency	2 (14%)
Can be funded via modular investment (capital vs operational)	1 (7%)

Notes:
1. Weighting applied here reflects the importance of accounting for community needs and priorities followed by the reasonable achievement of VMT reduction which is the crux of program effectiveness. The three attributes reflecting implementation challenges and opportunities are evenly weighed. Opportunities for capital VMT reduction projects are given the least emphasis; though valuable, this is not the most important factor, and programmatic or operational mitigation actions can be incorporated into the program.
2. This reflects alignment with community-articulated priorities from Phase 1: Broad and Diverse Input engagement.

Source: Fehr & Peers, 2024.

Application of the weighting criteria scoring resulted in the following rank order of VMT reduction categories (respective scores are noted in parentheses):

- Transit: Capital Projects (11)[25]
- Transit: Service Improvements (9)
- Increased Activity Options in Local Neighborhoods (8)[26]
- Biking and Walking Facilities (7)
- On-Demand Mobility (6)
- Transit, Bike and Carpool Incentives (6)
- Change in Travel Cost (5)

4.1.2 Identify VMT Reduction Projects

As a next step in the selection process, representative projects and source documents were identified for the seven VMT reduction categories as presented in **Table 18**. This table lists representative VMT reduction projects from adopted plans, organized by category, along with the reference materials from the plans and policies used to create the VMT reduction project list.

[25] In engagement work, this VMT reduction category was referred to as "Fast and Frequent Transit" but it was split into two categories (Capital Projects and Service Improvements) for the VMT reduction project action selection process.

[26] In engagement work, this VMT reduction category was referred to as "Many Things to Do Nearby."

Table 18: VMT Reduction Category Projects and Source Documents

VMT Reduction Categories	Representative VMT Reduction Projects[1]	Sample Projects/Plan Sources
Transit: Capital Projects	• **Implementation of transit-priority roadway treatments such as signal priority, boarding islands, or dedicated lanes** • Bus stop improvements such as shelters, benches, and lighting • Increased network coverage	• VTA High-Capacity Transit Study; • VTA Short-Range Transit Plan • VTA Better Bus Stops Plan; • Transit Asset Management Plan; • VTA-implemented Express Bus Partnership Program; • Transit Service Plan; • Local Community Based Transportation Plans (CBTPs)
Transit: Service Improvements	• Implementation of transit-priority roadway treatments such as signal priority • Provide bus rapid transit • Increased transit service frequency	• VTA High-Capacity Transit Study; • Short-Range Transit Plan; • Transit Asset Management Plan; • VTA-implemented Express Bus Partnership Program; • Transit Service Plan; • Local Community Based Transportation (CBT) Plans (CBTPs)
Increased Activity Options in Local Neighborhoods[2]	• Increased residential density • Increased job density • Transit-oriented development • Increased density of affordable and below market rate housing near transit • Implementation of publicly accessible trip-end facilities • Housing Relocation-Subsidy Program	• VTA Transportation Demand Management (TDM) Program; • VTA Transit-Oriented Development (TOD) Program • Local Specific Plans, TOD, and Station Area Development Plans
Biking and Walking Facilities	• Expanded pedestrian network • Expanded bike network • Improved street connectivity	• VTA Congestion Management Program (CMP) Documents • Valley Transportation Plan 2040 • Local Multimodal Improvement Plans • Local and Countywide Bicycle and Pedestrian Plans and related Capital Improvement Programs
On-Demand Mobility	• Carshare and rental car subsidies • Bike- and scooter-share services • Ridesharing program • Implement or expand on-demand shuttle service	• VTA Transportation Demand Management (TDM) Program • Local Microtransit Service Plans

VMT Reduction Categories	Representative VMT Reduction Projects[1]	Sample Projects/Plan Sources
Transit, Bike, and Carpool Incentives	• Subsidized or free transit passes • Subsidized or free passes for bike- and scooter-share services • Subsidized or free passes for on-demand shuttles • **E-bike subsidies** • **Vanpool** • Subsidized bike leasing • Commute trip reduction (CTR) services	• VTA TDM Program; • VTA-implemented Vanpool Subsidy Program; • Local Jurisdiction CBT Plans; • MTC Regional Vanpool Subsidy; • VTA SmartPass, MTC Clipper BayPass and Clipper START discounted transit programs • Commute trip reduction programs promoted and/or implemented by local Transportation Management Associations
Change in Cost of Travel	• Unbundle parking from residential rent • Market priced on-street parking to deter use of automobiles and/or encourage park-once behavior • Reduced or free transit fares • Express lane pricing	• VTA TDM Program; • Unbundled parking at recent residential developments in cities throughout Santa Clara County • Parking Benefit Districts

Notes:
1. **Bolded** items are example VMT reduction projects evaluated further for potential inclusion in the shortlist of example VMT mitigation actions discussed during Phase 2: Filter and Refine engagement.
2. In engagement work, this VMT reduction category was referred to as "Many Things to Do Nearby."

Source: Sample projects and plan sources and representative VMT reduction projects provided by VTA, 2023-2024.

After extensive review and discussion, VTA identified seven example VMT reduction projects to evaluate relative to VMT reduction priorities. This set of projects is presented in **Table 19**.

Table 19: Example VMT Reduction Projects

VMT Reduction Categories	Example VMT Reduction Projects
Transit: Capital Projects	Transit Speed and Reliability Improvements – King Road
Transit: Capital Projects	Senter Road Transit Priority Improvements
Transit: Capital Projects	VTA Better Bus Stops
Transit, Bike and Carpool Incentives	Enhanced Vanpools
Transit, Bike and Carpool Incentives	E-Bike Subsidies
Increased Activity Options in Local Neighborhoods	Housing Relocation Subsidy Program
Transit, Bike and Carpool Incentives	Incentives and Promotions to Use Other Modes (Voluntary)[27]

Source: VTA, 2024.

[27] Unlike mandatory commute trip reduction programs, voluntary programs do not impose trip reduction requirements or require monitoring and reporting. As a result, the VMT reduction efficacy of voluntary programs is expected to be lower than that of mandatory programs.

Next, the project team evaluated the example VMT mitigation projects from **Table 19** for the viability of the VMT mitigation actions. For viability, the project team considered practical criteria for implementation feasibility, scalability, alignment with equity-based VMT reduction goals, and legal requirements of additionality, summarized in **Table 20**.

Table 20: Considerations for Selecting the Example VMT Mitigation Actions

Looking for VMT Mitigation Actions that:	Why is this important?
Could be implemented relatively quickly and could be applicable in a variety of locations around the county.	The initial VMT mitigation program is going to be a proof of concept, so will need to efficiently demonstrate whether this type of program is likely to be feasible.
Are relatively inexpensive and/or can be scaled up or down easily.	The amount of money that will be generated from an initial VMT mitigation program is unpredictable, so will need strategies that can adapt to uncertain funding streams.
Align with the community input from Phase 1: Broad and Diverse Input and can be designed to benefit EPC areas or populations.	Listening to community input and advancing equity goals are core expectations of this VMT mitigation program.
Have substantive VMT reduction potential.	The initial mitigation program will be voluntary, so will need to appeal to local agencies by offering evidence-based VMT reductions that help them reach their CEQA targets.
Do not already have funding from other sources.	To meet CEQA law, strategies funded with mitigation dollars need to be “in addition to” actions that are already committed to being done. Put another way, additionality is the concept that a mitigation action proposed to offset a project’s significant impact under CEQA would not otherwise occur in the absence of the program and commitment of funds by a Project Applicant. This is referred to as the “additionality test.”

The seven example VMT reduction projects were filtered based on the criteria from **Table 20** with the outcome that some projects were not selected for inclusion in Phase 2: Filter and Refine engagement (refer to **Table 21**).

Table 21: Reason for Selecting Example VMT Mitigation Actions

VMT Reduction Categories	Example VMT Reduction Projects	Include in Phase 2: Filter and Refine Engagement as Example VMT Mitigation Actions?
Transit: Capital Projects	King Road Transit Speed and Reliability	Yes. *Project Source Materials: VTA High-Capacity Transit Study (2024).*
Transit: Capital Projects	Senter Road Transit Priority Improvements	No. Funding was recently secured.
Transit: Capital Projects	VTA Better Bus Stops	No. Limited evidence about VMT reduction potential, and funding may already exist.
Transit, Bike and Carpool Incentives	Enhanced Vanpools for non-office workers	Yes. *Project Source Materials: Community-Based Transportation Plan for Gilroy (2006), MTC Regional Vanpool subsidy Program, and VTA Supplemental Subsidy Program*
Transit, Bike and Carpool Incentives	Means-based subsidies for e-bikes	Yes. *Project Source Materials: California E-bike incentive project, UC Davis, Can Do Colorado e-bike Pilot, and Denver e-bike voucher report.*
Increased Activity Options in Local Neighborhoods	Means-Based Housing Relocation Subsidy Program	Not initially. Challenging to implement and could be costly.
Transit, Bike and Carpool Incentives	Incentives and promotions to use other modes (Voluntary)	No. Not well defined with limited community support in Phase 1: Broad and Diverse Input engagement.

Source: Fehr & Peers, 2024.

The outcome of the filtering process was the identification of three example VMT mitigation actions that were presented in the Phase 2: Filter and Refine engagement activities:

- Bus Speed Improvements – King Road
- E-Bike Subsidies
- Enhanced Vanpools

The project team compared the results of the filtered projects to all feedback received during Phase 1: Broad and Diverse Input. From Phase 1: Broad and Diverse Input, the project team learned that local communities and jurisdictions are interested in the following:

- Transit services that are faster and more reliable: Because of the need to implement projects quickly and deal with unpredictable funding streams, it is not advisable to use funds from the initial mitigation program to establish and operate new transit services. However, those funds could be used to improve the user experience along existing transit routes (improved speed, reliability, and safety, lighting, shelters, larger platforms, restrooms, landscaping), and/or to provide free or subsidized transit passes.
    - This led to a focus on transit speed and reliability improvements.
- Better pedestrian and bike facilities: It can take several years to design and construct a new dedicated grade separated bicycle path (versus painting a bike lane) and research indicates bicycle infrastructure investments tend to be relatively expensive on a per-VMT-reduced basis.28 So, new bike infrastructure may not be the best choice for the initial VMT mitigation program. However, other ways to encourage more bicycling outside of building new infrastructure could be cost effective and faster to implement.
    - This led to a focus on financial incentives for bicycle use, such as e-bike subsidies.
- More information about transit and micromobility services and incentives and reducing the overall cost of travel: Strategies related to financial incentives and better traveler information tend to fall under the general umbrella of TDM. There are TDM programs of various sorts throughout the county, so the VMT mitigation program needs to identify and fill gaps in current services to meet the additionality test.
    - This led to a consideration of gaps in transit service and TDM, such as an enhanced vanpool program for workers not included in existing employer ride-matching or vanpool programs.

4.1.2.1 Example VMT Mitigation Actions Feedback

The following three example VMT mitigation actions emerged from the selection process and were presented to the community and stakeholder groups during Phase 2: Filter and Refine engagement:

E-Bike Subsidies Feedback

Overall, the team heard that this VMT mitigation action would be widely useful and had strong support from the community, with most feedback focused on ways to further improve the action. However, there were a few elements that the community felt their use

[28] For more detail, see **Appendix M** and the cited research on bicycle improvements.

of this mitigation action would be contingent upon. A key concern expressed by community members was access to adequate bikeways, especially in EPCs located in East San José, Gilroy, and unincorporated parts of the county which lack high-quality bike facilities. Community members and local jurisdiction staff alike emphasized that the action would be more effective and meet the needs of a greater population with improvements to the bikeway network to enhance safety and comfort. A safe, low-stress bicycle network is essential for maximizing the action's value, particularly for EPCs.

Some CBO partners also noted challenges for EPC residents in accessing the program. They highlighted that learning how to use an e-bike, obtaining vouchers, and identifying when and where to purchase an e-bike would present hurdles to many EPC community members. Addressing these knowledge gaps through education programs and partnerships with CBOs will be critical for ensuring equitable access to this mitigation measure.

In addition to the feedback above, the team received feedback on other potential improvements to the VMT mitigation action which would be helpful but not as crucial to include:

- Clearly confirm and communicate that the voucher can fully cover the cost of an average e-bike and essential safety equipment, such as a helmet and lights.
- Partner with local community-based organizations (e.g., Peninsula Clean Energy, Acterra) that are already engaged in e-bike programs to assist with subsidy administration and marketing. This could include support for the application process, e-bike purchases, and educational courses on safe e-bike use.
- Ensure the program allows for multiple subsidies per household.
- Consider expanding the program to include other types of electric micromobility devices (e.g., e-scooters).
- Explore options for additional bike parking inside buses or alternative storage methods that accommodate heavier bikes more easily.

Bus Speed Improvements – King Road Feedback

Bus speed improvements received moderate support from the community. Many participants expressed interest in the benefits of more reliable and faster bus service, and they appreciated the inclusion of Complete Streets design features that would improve cyclist protection, close bike lane gaps at bus stops, and reduce vehicle speeds. However, many EPC members indicated they would not benefit significantly from this VMT mitigation action due to limited service frequency, coverage, and access to desired destinations. Some community members noted that increasing transit frequency to high-frequency service (e.g., 15-minute headways) would have a greater impact on their travel behavior than a small reduction in travel time on already frequent routes. Participants also highlighted the importance of improving first-/last-mile facilities to enhance transit accessibility.

Assuming this mitigation action would be implemented on a transit route that met their needs, participants and staff from VTA and local jurisdictions provided the following suggestions to better align the action with their needs:

- Increase service frequency and coverage on existing routes and expand service to additional areas.
- Ensure adequate lighting at bus boarding islands.
- Make bus boarding islands ADA accessible and provide a positive experience for individuals with disabilities.
- Design bus-only lanes to restrict private vehicle access using red paint, improved signage, and enhanced enforcement.
- Consider adding bike lockers or other bike parking options at bus boarding islands (refer to e-bike subsidies project feedback).
- Consider additional locations for implementation beyond King Road including the El Camino Real/522/22 corridor (which spans six cities), Story Road (San José), Senter Road (San José), King Road (San José), 1st Street (Gilroy), Monterey Road (South County), and Tully Road (San José).

Enhanced Vanpools Feedback

This action would subsidize vanpools for shift and service commuters—more likely to be members of equity communities—who live or work in Santa Clara County.

Enhanced vanpools garnered medium favorability among the community. Participants appreciated vanpooling as a means to reduce commute stress and improve travel times, though many expressed concerns about the logistics of organizing vanpools. Feedback on how to address logistical complexity included suggestions to pursue partnerships with employers or community-based organizations (CBOs) to help form groups, organize schedules and routes, ensure accountability, and provide support with applications, paperwork, finances, and van parking.

Engagement participants suggested the following improvements as elements that could be implemented to further enhance the effectiveness of this VMT mitigation action:

- Partner with community-based organizations (CBOs) or employers to organize vanpools.
- Allow vanpools to use express lanes and promote vanpool programs through the express lane system.
- Provide overnight parking for vans at transit centers, park-and-ride lots, or other public parking facilities.
- Include the option to purchase zero-emission vehicles.
- Expand the subsidy to cover costs such as the van, fuel, insurance, and other vehicle-related expenses.

The project team received feedback from nearly all groups expressing a preference for more shuttle or on-demand transit services (i.e., microtransit), either in addition to or instead of the Enhanced Vanpool mitigation action. This is discussed further in the 'Additional Supportive Actions' section below.

Many participants felt a fixed shuttle or on-demand service would better address transit gaps, providing access to destinations beyond workplaces. Shuttles were favored for their convenience and fewer logistical challenges compared to vanpools, which require coordination among co-workers or commuters. There was strong support for shuttles driven by paid drivers, as they were seen as more reliable and easier to organize. Suggestions included creating shuttle routes connecting residential neighborhoods to employment centers, shopping areas, health centers, and main streets or downtowns, as well as providing shuttle service to community events and council meetings. Feedback also indicated it would be beneficial to offer connections to other counties and include an app or phone line to improve accessibility.

4.1.3 VMT Reduction and Cost Analysis

At this stage in the selection process, each VMT mitigation action was subjected to VMT reduction quantification and cost analysis based on current best practices and a literature review of VMT reduction actions. The analysis evaluated the potential of the actions to reduce VMT for land use development projects in a cost-effective manner, while meeting program requirements for additionality. This is of crucial importance to the program. CEQA requires mitigation actions to be supported by substantial evidence documenting that they are anticipated to reduce VMT enough to offset the identified VMT impacts of development projects. Furthermore, the cost per VMT reduced must be competitive with alternative strategies to incentivize participation in the program by lead agencies and Project Applicants. If the cost per VMT reduced through this program is unreasonably high, Project Applicants may propose and implement other VMT reducing actions not designed with the program's cross-jurisdictional emphasis and equity outcomes in mind. Ultimately, the program must strike a balance between equity outcomes and cost-effectiveness of VMT reduction to be beneficial to the community, and useful for lead agencies and developers.

VMT reduction quantification and cost estimation, together, are necessary steps in calculating the extent to which each of the three example VMT mitigation actions can reduce VMT, of which type of VMT, in what areas, and for what unit cost. When this mitigation program is implemented, the results of this analysis, combined with measures of equity outcomes and stakeholder-level implementation considerations, will be used by the future VMT Mitigation Action Review Team to prioritize mitigation actions.

4.1.3.1 VMT Reduction Quantification

A detailed VMT reduction analysis was performed for each of the example VMT mitigation actions selected for the Phase 2: Filter and Refine engagement. The current state of the practice for estimating VMT reduction efficiency is the California Air Pollution Control Officers

Association (CAPCOA) 2021 *Handbook for Analyzing GHG Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, and additional research. These VMT reduction calculations demonstrate the type of data and documentation needed to provide substantial evidence documenting the VMT reduction cost, additionality, and equity considerations.

The project team used various inputs for calculations such as Year 2015 and 2040 VMT metrics for areas in the county, service population metrics, and travel mode share data from the VTA Travel Demand Model. Additional data sources included geographic information such as VTA bus stop locations, weather data to estimate cycling usage, and more. Based on this body of information, the project team developed assumptions about project elements that would contribute each example VMT mitigation action and calculated VMT reduction estimates at the daily, annual, and lifespan scale. See **Appendix M** for details.

4.1.3.2 VMT Reduction Costs

The project team estimated costs associated with the example VMT mitigation actions, assuming a VMT reduction project lifespan of 25 years and accounting for capital, administrative, and contingency cost items. A 25-year timeframe is common for capital planning. In this case, it accounts for the implementation and maintenance costs of transit improvements, as well as the recurring cycles of bike and vanpool subsidies over the 25-year period. Using this timeframe does not require or imply, for example, that a specific vanpool would operate continuously for 25 years or that an individual user's e-bike would last without replacement for the same period. Cost estimates were normalized to year 2023 values and used to produce cost per VMT reduced values at the daily, annual, and project lifetime scale. The duration of the VMT mitigation action may in fact be longer because the VMT impact may be longer or even permanent.

4.1.3.3 VMT Reduction Quantification and Cost Analysis Results

The outcomes of the VMT reduction quantification and cost analysis are presented in **Table 22**. Detailed calculations and research citations are provided in **Appendix M**.

Table 22: VMT Mitigation Action Cost-per-VMT-Reduced Summary

Example VMT Mitigation Action[1]	Mitigation Type	VMT Reduction (Avg Day)	Cost-per-VMT-Reduced (Avg Day)
Bus Speed Improvements – King Road[2]	Capital	< 100	> $15
E-Bike Subsidies	Capital	7,500 – 13,000	$0.30 – $0.60
Enhanced Vanpools	Operational	11,800 – 34,700	$0.50

Notes:
1. For details on analysis assumptions and methodology, please read the full VMT Reduction Quantification section of this report and/or refer to **Appendix M**.
2. The project analyzed is within an EPC area and represents one segment of the network of corridors prioritized for speed, frequency, and reliability improvements detailed in the VTA High-Capacity Transit Study (2024). Results could differ if a larger portion of the network were subject to improvements.

Source: Fehr & Peers, 2024.

A key program performance metric is ensuring that no excess VMT is generated by new developments in Santa Clara County as a result of the program. As described in **Table 3**, this would require a future countywide VMT mitigation program to reduce Santa Clara County excess VMT by 11,400 VMT per day. Based on the VMT reduction quantification and cost analysis of the projects as they were conceived at the time of analysis, only Enhanced Vanpools and E-Bike Subsidies would be capable of achieving this reduction if implemented independently.

This is based on the current conceptualization of VMT mitigation actions and does not account for the induced automobile travel that may occur in response to VMT mitigation actions. See **Appendix N** for more information.

4.2 Selection of VMT Mitigation Actions During Implementation and Program Operation

The preceding sections have discussed the process for prioritizing and selecting the example VMT mitigation actions for this Equitable VMT Mitigation Program Framework, as well as the VMT reduction and cost analysis that was performed for these example actions. The following sections discuss how VMT mitigation actions for a VMT mitigation program in Santa Clara County could be performed more generally, including:

- The VMT Mitigation Action Review Team responsibilities
- The selection process for VMT mitigation actions
- Additional supportive actions for the example VMT mitigation actions
- Considerations for VMT mitigation action categories, and
- Equity considerations in VMT mitigation action selection.

4.2.1 VMT Mitigation Action Review Team Responsibilities

The VMT mitigation action selection process described in this chapter would principally be the purview of the VMT Mitigation Action Review Team, once such a team is established. The exact composition of this team is yet to be determined and would be developed during a potential implementation phase. The review team would likely have the following roles and characteristics:

- The review team would be structured to provide oversight of the VMT mitigation action selection process.
- The review team should be diverse, reflecting the county's demographics, and include both technical experts and representatives who can advocate for the needs and concerns of EPC areas and populations.
- Given the potential for staff turnover, it may be beneficial for the review team to include one representative from a pre-determined list of stakeholders, rather than a particular individual.
- The team will need to evaluate proposed VMT reduction projects according to the criteria detailed previously in this chapter, such as magnitude of VMT reduced, cost-effectiveness, alignment with equity priorities, feasibility of implementation, institutional and governance considerations, and others.
- The review team's work would be performed whenever new projects are proposed for program inclusion.

4.2.2 Selection of VMT Mitigation Actions

In an implementation phase, the Program Sponsor and interested local jurisdictions could build on the general selection process laid out in this program framework, which was presented in **Figure 11**. The participating agencies could decide to begin the process at Step 2, Select VMT Reduction Projects, building on the community and stakeholder input on travel needs, challenges and VMT reduction categories gathered in the development of this program framework.

In an implementation phase and under program operation, the future VMT Mitigation Action Review Team may opt to use a points-based system to select VMT mitigation actions. Points could be assigned to a VMT reduction project based on how well a given project meets VMT reduction, equity, and feasibility criteria.

The value of a prioritization scheme is that it can be used to identify mitigation actions for inclusion in a program by ranking potential projects based on how well they align with agreed-upon program objectives and community feedback. This approach ensures that selected actions are both effective in achieving the program's goals and responsive to the needs and priorities expressed by the community.

The project team explored three alternative prioritization schemes to test how sensitive the ranking of the three example VMT mitigation actions was to different criterion weighting. One

alternative put the greatest weight on minimizing costs, a second alternative put the greatest weight on reducing overall VMT, and another alternative put the greatest weight on achieving VMT reductions in EPC areas. The conclusion was that the three example VMT mitigation actions ranked similarly under all three alternative prioritization schemes, with the Enhanced Vanpool action typically ranking first, followed by E-Bike Subsidies and Transit Bus Speed Improvements, although the relative strength of each action varied quite a bit depending on the prioritization scheme used.

This prioritization exercise illustrates how weighting choices affect VMT mitigation action rank. Adjusting weights can result in convergence or divergence of scores and the reshuffling of VMT mitigation action rankings. At this stage of program development, the project team recommends the future VMT Mitigation Action Review Team implement a prioritization scheme that emphasizes equity performance metrics and achievement of VMT reductions in EPC areas. For an example of prioritization schemes emphasizing different desired outcomes, refer to **Appendix O**.

In the future, the VMT Mitigation Action Review Team could explore variations on this and other schemes as the program evolves and additional mitigation actions are proposed. As noted in the MTI/SJSU project report, “Developing equitable criteria and evaluation metrics from scratch could be initially challenging and may require some trial and error to identify the right criteria and metrics.”[29] Iteration of evaluation criteria is to be expected during the program lifecycle.

4.2.3 Additional Supportive Actions

During discussions about the example VMT mitigation actions in this program framework, community members, VTA, and local jurisdiction staff proposed the following additional supportive actions. These actions were identified as desirable, if not essential, to enhance the effectiveness of the example VMT mitigation measures. Supportive actions would involve implementing separate projects designed to complement the VMT mitigation efforts. Future review teams should evaluate whether any of these actions could be integrated into the program directly as VMT mitigation actions or funded through other sources.

4.2.3.1 Supportive Actions for E-Bike Subsidies

Ideally, the supportive improvements suggested below would be made before or in conjunction with implementation of the E-bike Subsidies VMT mitigation action.

- **Expand bike network**: Access to adequate facilities was one of the most frequently expressed needs by the community. The team heard that many participants would feel more comfortable biking and using e-bikes if a safe and comfortable bike network were in place. This concern was particularly prevalent in EPC areas such as East San José,

[29] For more information see Serena Alexander, Luana Chen, and Maxwell Belote-Broussard. "Exploring Equity Frameworks for a Cross-Jurisdictional Vehicle Miles Traveled Mitigation Program in Santa Clara County" Mineta Transportation Institute (2024). https://doi.org/https://doi.org/10.31979/mti.2024.2346.

Gilroy, and unincorporated areas of the county, where high-quality bike facilities are limited. While this action is projected to have a low VMT impact, improving the bike network offers significant safety and equity benefits. Community and stakeholder feedback suggests prioritizing bike infrastructure improvements in EPC areas to create a connected, low-stress bicycle network.

- **Increase bike parking and e-bike charging**: Nearly all groups highlighted the need for more secure and convenient e-bike parking and charging options. This is especially important for EPC populations, who may have fewer secure storage spaces at home or limited access to charging facilities. Community and stakeholder feedback suggests that existing developments should provide adequate e-bike parking and charging infrastructure. Local jurisdictions could also consider updating bike parking requirements for new developments to better accommodate e-bikes and households with multiple bikes. Additionally, local jurisdictions and VTA could assess current public bike parking and charging availability and explore opportunities to add these facilities in future projects.
- **Upgrade planning and regulations**: The rise of e-bikes and other emerging micromobility technologies introduces new safety considerations for bicyclists, pedestrians, and vehicles. Community and stakeholder input suggests exploring opportunities to regulate e-bike and micromobility device speeds and enhance safety on transportation facilities. Local jurisdictions should also consider the needs of e-bike and micromobility users when reviewing development and street improvement plans, such as ensuring sufficient bicycle parking and charging infrastructure.
- **Enhance bikeshare subsidies**: Community and stakeholder input suggests offering discounted or free access to bikeshare services, including e-bikes, as a way to reduce the need for personal bike storage and maintenance, potentially increasing ease of use. While Bay Wheels offers a discounted membership program, its eligibility requirements may present a barrier for some individuals. Additional discounts could be provided through this supportive action to expand accessibility beyond the existing Bay Wheels for All program. Some community and stakeholder members suggested that the e-bike subsidy would be more effective if the e-bikes were shared by a specific apartment building or business rather than owned by an individual. In this case, the subsidy could serve as the initial seed fund for purchasing shared bikes for the building. Maintenance costs could be offset by a small rental fee. This approach would benefit multiple users while reducing the need for bike storage and ongoing maintenance.

4.2.3.2 Supportive Actions for Bus Speed Improvements

Ideally, these additional suggested improvements would be made before or in conjunction with the Bus Speed Improvements VMT mitigation action.

- **Expand transit service**: Many EPC members expressed they would not benefit from this action because transit services do not currently align with their desired destinations or schedules. This VMT mitigation action may achieve greater VMT reduction if paired with projects to expand transit service. Community members also

noted that increasing transit frequency to high-frequency service (e.g., 15-minute headways) would have a greater impact on their travel behavior (e.g., shifting from driving) than a 5-minute travel time savings on an already frequent route.

- **Develop mobility hubs**: Consider developing mobility hubs that provide access to transit and first/last mile services. Mobility hubs are community locations that integrate public transit, bike share, car share, and other transportation options, enabling people to travel without relying on private vehicles. These hubs offer a safe, comfortable, and convenient space for seamless transfers between different modes of transportation. While not directly related to the Bus Speed Improvements VMT mitigation action, the project team heard significant support for this concept.
- **Enhance transit fare subsidies**: Community and stakeholder input suggests that cost, or the perception of cost, remains a barrier to transit use for some individuals. While fare subsidies were not selected as a primary VMT mitigation action in this program framework due to lower prioritization during Phase 1: Broad and Diverse Input engagement, agencies could consider supplementing the Bus Speed Improvements VMT mitigation action with a transit subsidy program, or by expanding the Clipper START Pilot Program, to reduce costs for low-income riders. Some community and stakeholders suggest CBOs should manage the distribution of transit passes, rather than assigning them to specific apartment buildings where they might go unused. CBO involvement would likely ensure more equitable distribution. Additionally, VTA and other transit operators could explore offering free transit for youth, seniors, or riders of all ages, though this would require separate revenue, policy, and operational analysis.

4.2.3.3 Supportive Actions for Enhanced Vanpools

Ideally, these additional suggested improvements would be made before or in conjunction with the Enhanced Vanpools VMT mitigation action.

- **Shuttle Service/On-Demand Shuttle (Microtransit) Program**: The project team heard from nearly all community groups that they would prefer a shuttle service or on-demand shuttle program (such as the Silicon Valley Hopper in Cupertino and Santa Clara, or the MoGo program in Morgan Hill) either in place of or in addition to the Enhanced Vanpool VMT mitigation action. Community and stakeholder input indicated that a fixed or on-demand microtransit program would better address the transit gaps in the county and provide access to destinations beyond workplaces. A microtransit program was also viewed more favorably by many participants due to its convenience and fewer logistical challenges compared to vanpools. There was strong support for shuttles operated by paid drivers, as they were seen as more reliable and easier to coordinate than vanpools driven by co-workers or other commuters.

- Community and stakeholder input also suggests considering a shuttle service or on-demand shuttle program that connects residential neighborhoods to major employment centers, shopping areas, health centers, and downtown areas. Several participants suggested providing shuttle access to engagement events and council meetings, developing an app or phone line for ease of use, and offering connections to other

counties. This microtransit initiative could complement the Enhanced Vanpool mitigation action to provide more comprehensive access improvements.

4.2.4 Considerations for VMT Mitigation Action Categories

The example VMT mitigation actions identified in this program framework fall into three VMT mitigation action categories, and it is anticipated that several future VMT mitigation actions included in this program will fall into these same three categories:

- **Financial Incentives:** Programmatic actions that would establish or expand VMT reduction programs, which could include TDM measures such as the provision of discounted or free transit passes and funding incentive programs that encourage the use of carpooling, active transportation, and transit. Example action: e-bike subsidies.
- **Capital Projects:** Physical improvements to the transportation network that reduce VMT, including pedestrian, bicycle, and transit infrastructure projects, such as bike lanes and bus lanes, or land use-related mitigation actions such as infill affordable housing. Example action: transit speed improvements.
- **Services:** These types of improvements provide ongoing services that encourage people to use modes other than single-occupancy vehicles. These can include increases in the frequency or service hours of transit routes, the expansion of transit into formerly unserved areas, and the provision of carshare, bikeshare, carpooling, and micromobility programs. Example action: enhanced vanpools and/or an on-demand shuttle service.

Based on the feedback received during Phase 2: Filter and Refine engagement, the project team identified several considerations that apply categorically. Incorporating at least some of these considerations into mitigation actions would help to maximize their value to EPC areas and populations.

Please note that several of these suggestions were provided by the community and would not have been included without their input. These are noted with an asterisk (*).

Financial Incentives

- **Offer education courses*:** Education courses offered by VTA, CBOs, or partner organizations can help to reduce barriers to entry, especially for EPCs. Format, time of day, and language should be carefully considered so that the education courses are easily accessible for all ages and abilities.
- **Partner with CBOs for marketing and support*:** CBOs can help administer programs by providing application and procurement support, communicating the existence and benefits of programs offered, offering education courses (as noted above). Collaborating with CBOs for support or administration would be highly beneficial but requires allocating funds to compensate partners for their contributions. Any mitigation action involving or benefiting from such partnerships must include the cost of these services in its overall cost evaluation.

- **Allow multiple subsidies or discounts per household*:** Most households have more than one person that travels regularly for work, errands, or recreational activities. Subsidies or discounts should be allowed for every household member that meets eligibility requirements (e.g., age).
- **Share materials on supportive programs:** When the Implementing Agency and CBOs promote an action included in a VMT mitigation program, this can offer be an extra marketing opportunity for additional supportive programs (e.g., supporting access to Guaranteed Ride Home, or rental bicycle lockers rental details). More importantly, providing information to the community about supportive programs can help to increase the usefulness of the program VMT mitigation action and may reduce potential apprehension about shifting to a new travel option.
- **Ensure subsidies or discounts cover the full cost of the item*:** For VMT mitigation actions involving financial incentives, the benefit should cover the full cost of a mid-range item or service so that low-income families are not required to pay additional costs out of pocket. Many low-income families do not have disposable income to spend on these programs, so covering the full cost will ensure that low-income families can take advantage of the program.
- **Ensure equitable access:** The Implementing Agency and CBOs should provide information about financial incentives in multiple languages and multiple formats to improve access to the subsidy. This suggestion aligns with the program's Equity Framework, VTA's equity statements, and community feedback.

Capital Projects

- **Plan at a countywide scale:** Project planners should consider how an individual VMT mitigation action connects to the wider, countywide transportation network. To achieve adequate VMT reductions, actions need to be scalable throughout the county. When prioritizing locations and order of implementation, project planners should consider first implementing improvements in EPC areas (or areas that serve EPC populations) then expanding to other areas, and communities, while also weighing the net VMT reduction that will result from the action.
- **Consider safety and Complete Streets best practices:** Project planners and engineers should consider designing projects to align with the Federal Highway Administration (FHWA) Safe System Approach by focusing on preventing severe traffic related injuries or death. Planners and engineers should consider opportunities to plan for different modes and separate different users in space and time. Actions should align with VTA's Complete Streets Program objectives, VTA's Bicycle Technical Guidelines, VTA's local Vision Zero policies, and Caltrans Complete Streets guidance (such as Design Information Bulletin 94).
- **Prioritize EPC areas and vulnerable road users:** Project planners should consider prioritizing actions in EPC areas and on streets that are part of high-injury networks or Safe Routes to School routes.

- **Universal street design*:** Project planners and engineers should consider designing projects to go beyond ADA compliance and promote a safe and comfortable environment for people of all ages and abilities.

Services

- **Consider avenues to advertise the program service and raise awareness:** The project team heard from the community that it can be hard to keep abreast of the many services offered by local jurisdictions and VTA. The Implementing Agency and CBOs should consider how to increase awareness of new programs. This could include advertisements on social media, buses, and billboards. Jurisdictions can also partner with employers, housing developments, and CBOs to spread information about the service.
- **Partner with CBOs and other community partners to market and administer programs*:** CBOs can help raise awareness and connect eligible people with the right services. CBOs can also provide trainings and assistance on how to access and use services and/or vet a proposed service prior to implementation and provide recommendations to the implementing/planning agency. Such CBO involvement can increase trust in the service and reduce barriers to use. As noted previously, collaborating with CBOs would require allocating funds to compensate partners for their contributions.
- **Consider affordability and cost*:** Services should be affordable for low-income households. The Implementing Agency should consider whether there is an opportunity to provide free service or offer discounts for low-income households.
- **Ensure equitable access:** The Implementing Agency and CBOs should provide information about services in multiple languages and multiple formats to improve access to the subsidy. This suggestion aligns with the program's Equity Framework, VTA's equity statements, and community feedback.
- **Remove organizational burden*:** The Implementing Agency should consider the level of effort required of the community to use the service. The project team heard a hesitancy to use services that require high degrees of organization with others, such as submitting an application, providing an up-front deposit, and/or collectively organizing logistics. The Implementing Agency should consider opportunities to partner with organizations, CBOs, or employers to take on these organizational tasks for the community to increase ease of use for the community.

4.2.5 Additional Equity Considerations for the VMT Mitigation Action Selection

As noted in Chapter 1, SJSU/MTI graduate students from the Fall 2023 cohort of SJSU Urban Planning 236 contributed to four areas of equity analysis including a literature review, spatial analysis, community engagement observations, and stakeholder interviews.

The SJSU/MTI report includes several recommendations that are important to consider in the selection of VMT mitigation actions for a potential countywide program. These were shared with the project team at the outset of community and stakeholder engagement for consideration and incorporation throughout the project:

- **Embed equity into the project prioritization criteria and evaluation metrics:** The report recommends embedding equity into the VMT reduction project prioritization criteria and evaluation metrics. The SJSU/MTI team notes that the administrative ease of addressing this recommendation will depend on the tools available. The report states: "Developing equitable criteria and evaluation metrics from scratch could be initially challenging and may require some trial and error to identify the right criteria and metrics. If tools are already in place, drafting and updating the criteria and metrics should be a streamlined process." Regarding the time frame to implement this recommendation, the report states: "Initial development is short-term: this should be started early in the program design process. Implementation is long term: application of equity principles should remain a consistent and ongoing commitment, and criteria should be updated as context changes over time."
- **Consider certain areas for additional community engagement and project prioritization:** Based on the spatial analysis conducted by the SJSU/MTI team, the report recommends considering areas in Morgan Hill, northern Sunnyvale, and the unincorporated areas surrounding Gilroy for additional community engagement and VMT reduction project or VMT mitigation action prioritization. This recommendation was based on the fact that these areas show up in multiple equity index layers but are not included in MTC's EPC layer. The SJSU/MTI team suggests it should not be too challenging to incorporate these areas into the prioritization process for future VMT mitigation actions. The report notes that choosing areas for VMT reduction project prioritization would be a long-term process that continues into future implementation steps, noting "consideration of sites for VMT mitigation solutions may lead to enhanced mobility and connectivity for disadvantaged communities if projects are implemented."
- **Develop an informative and implementable accountability plan:** The SJSU/MTI report states that "developing an informative and implementable accountability plan protects equity in the program implementation process, builds trust between the agency and the public, and can mitigate transparency concerns." The report notes that building an accountability plan from scratch could be initially challenging but updating it should be streamlined once tools are in place. The SJSU/MTI team recommends developing a plan during program design and updating it as context changes.

A full summary of the SJSU/MTI team's recommendations is included in the Mineta Transportation Institute report "*Exploring Equity Frameworks for a Cross-Jurisdictional Vehicle Miles Traveled Mitigation Program in Santa Clara County*," published in May 2024.[30] The SJSU/MTI Research Brief is provided as **Appendix P** of this report.

[30] *Exploring Equity Frameworks for a Cross-Jurisdictional Vehicle Miles Traveled Mitigation Program in Santa Clara County*, Mineta Transportation Institute, May 2024, https://transweb.sjsu.edu/research/2346-Vehicle-Miles-Traveled-Transportation-Emissions-Equity

Chapter 5: VMT Mitigation Program Structure, Justification, and Administration

This chapter outlines the framework considerations and recommendations for a VMT mitigation program in Santa Clara County. While the statutory requirements of a VMT mitigation program are well established, the administrative and governance requirements are less well defined and have greater flexibility for implementation. Recommendations are based on working knowledge of regional VMT mitigation programs as well as community and stakeholder input.

This framework offers considerations and recommendations for (1) VMT mitigation actions that could be funded by a program, (2) the structure of a program, and (3) who would sponsor a program. This framework offers considerations and recommendations for specific actions, with detailed specifications to be determined in a potential future implementation phase of the VMT mitigation program.

5.1 VMT Mitigation Action Categories

The types of actions included in a program directly influence key aspects of its structure, making it essential to consider these actions first in the planning process. The primary recommendation is to launch the program with VMT mitigation actions like the three example VMT mitigation actions refined during Phase 2: Filter and Refine engagement, as detailed in **Chapter 4**. It is advised that the Program Sponsor and the VMT Mitigation Action Review Team carefully evaluate all considerations and recommendations specific to these actions and strive to integrate community feedback on key elements that were deemed essential for the project's success.

The example VMT mitigation actions fall into three categories which are likely indicative of many future actions as well: Financial Incentives, Capital Projects, and Services. Community feedback identified several considerations that apply across these categories, detailed in **Chapter 4**. It is recommended that at least some of these considerations be incorporated into the mitigation actions to enhance their value to EPC (Environmental Justice/Disadvantaged) areas and populations.

5.2 Recommended VMT Mitigation Program Structure and Implementation

As described in previous chapters, the consensus of the project team and stakeholder input was that a mitigation program should be established initially in the form of a VMT exchange, and potentially evolve to a VMT bank, with VTA as the Program Sponsor. Therefore, these are the recommendations on Program Structure and Sponsor for this Equitable VMT Mitigation Program Framework. More detail about how such a program could be implemented is provided here.

5.2.1 Near-Term: VMT Exchange

A VMT exchange, the preferred program structure for near-term implementation, requires administrative decisions and considerations presented in **Figure 12. Figure 13** presents several options for administrative specifications, presented as questions. The next section provides a closer look at pending administrative decisions and considerations that will need to be addressed during a potential implementation phase for the VMT exchange in Santa Clara County.

VMT Exchange

Implementation	Considerations
Step 1 **Determine Scale/Scope**	To create a regional program requires all participating agencies to adopt the program. Programs with larger scopes can: *Decrease administrative costs *Decrease local authority *Increase efficiency and effectiveness of the program
Step 2 **Determine Sponsor**	The organizational components of a mitigation exchange will depend on the type of sponsor (public or private) mitigation options, and matching process between mitigation options and projects.
Step 3 **Determine & Propose Mitigation Options**	If the sponsor is a public agency, they will develop a list of options developers can choose from to mitigate the VMT generated by their development. If the developer wants to propose their own mitigation exchange, they must get it approved by the sponsor and lead agency.
Step 4 **Develop Review Team**	The Exchange should have a Review Team to verify mitigation effectiveness and additionality based on substantial evidence. The team could consist of third-party representatives. The team reviews the mitigation list and verifies that the options reduce VMT and that the reductions would not have occurred without the project, program, or incentive. Because exchanges can include programs/incentives as mitigation options, the Review Team must continually evaluate them to ensure the options are still effective and determine to what degree they reduce VMT.
Step 5 **Administer Exchange**	The public agency/entity sponsoring an Exchange may not always be the lead agency on a project. In this situation the Sponsor should develop an agreement with the lead agency that allows the exchange's mitigation options to be considered an acceptable mitigation measure for the EIR. Exchanges must continue to prove that their mitigation options reduce VMT and that the reduction would not have occurred without the projects/programs. CEQA review of the exchange creation may be required to be considered as a formal mitigation program.

Procedural Flowchart

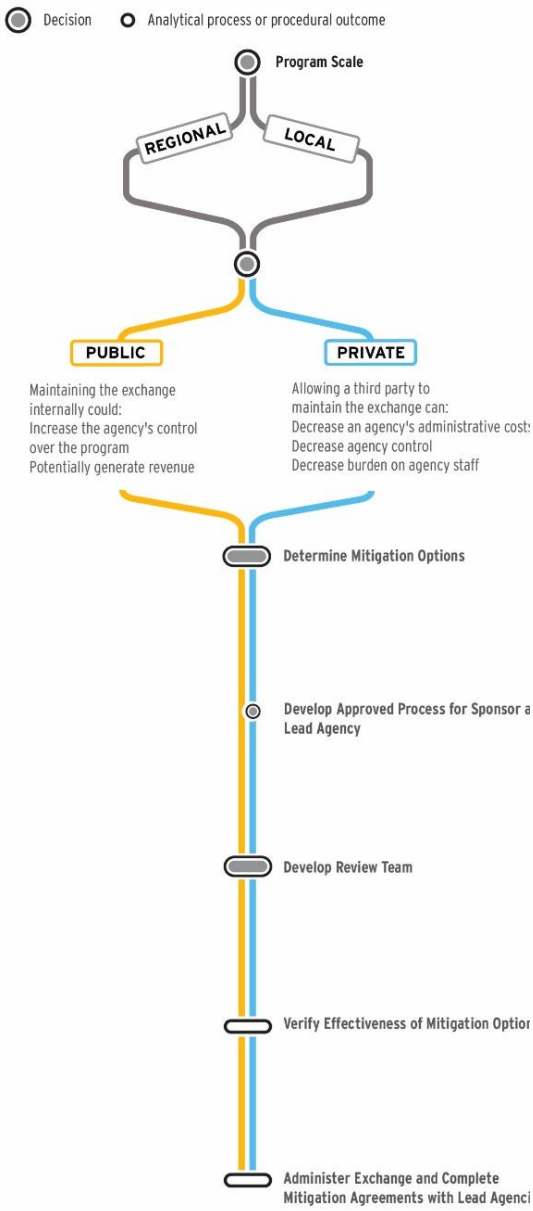


Figure 12: VMT Exchange Implementation Flow Chart

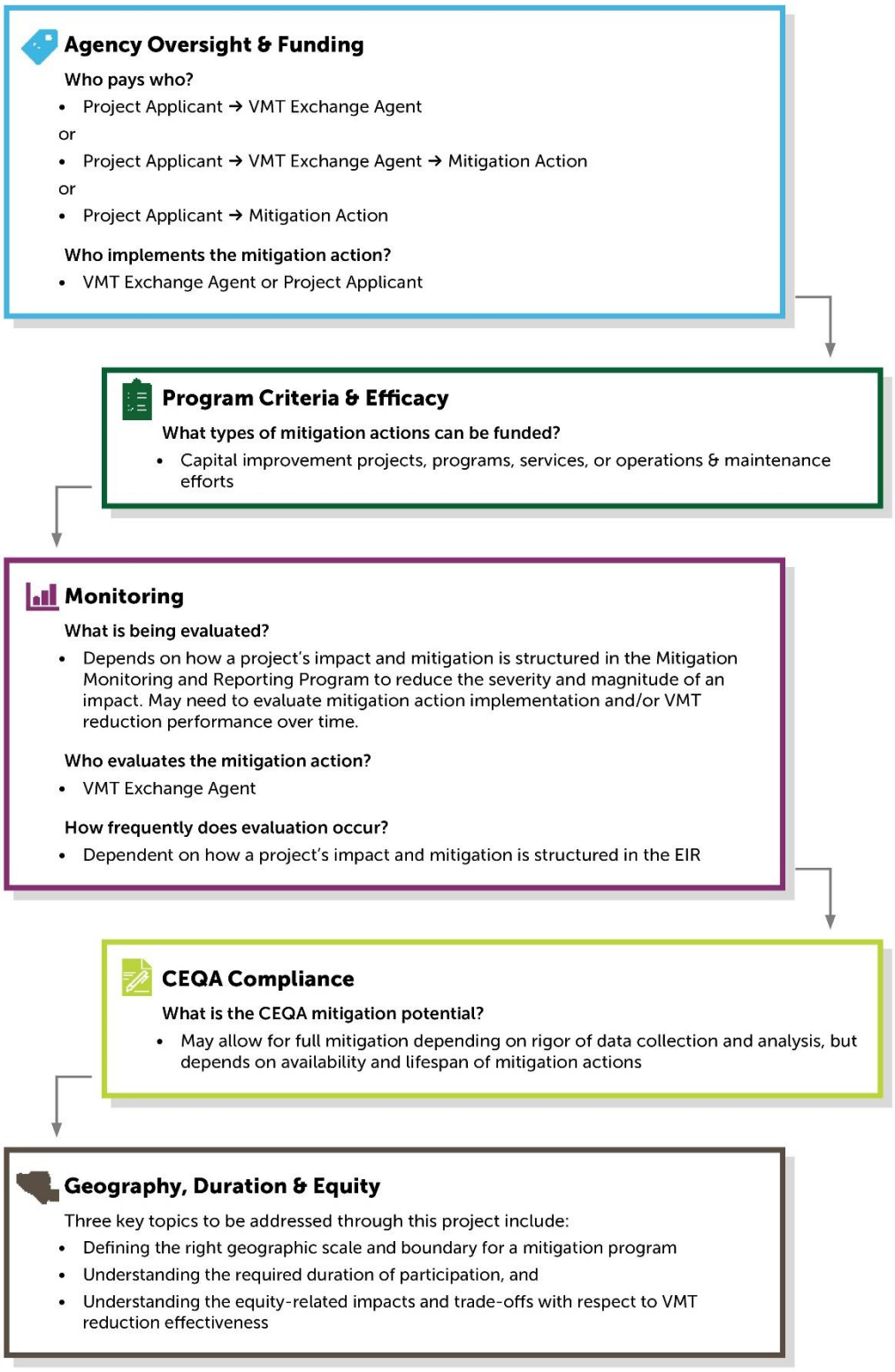


Figure 13: VMT Exchange Administration Questions

The project team identified the following considerations and recommendations to be addressed in a potential implementation phase. Many of these would also need to be included in legal agreements between the Program Sponsor and participating lead agencies. Discussion of each item, with the project team's preliminary recommendations, may begin immediately in the order suggested in **Figure 13**.

Agency Oversight and Funding

- **Who pays who?** The project team recommends the Project Applicant directly pay VMT mitigation funds to the sponsor (e.g., VTA). This would present a streamlined approach for accounting and administration purposes and provide a single point of contact for the application of funds to mitigation actions.
- **Who implements the mitigation action**? The delivery of the mitigation action will depend on the nature of the action. Certain actions may be best executed by VTA, others by different agencies, and still others may be most effectively implemented by the Project Applicant. The project team recommends that each action be delivered by the most directly relevant or capable entity, rather than unduly limiting options. Agreements may be written to favor delivery by the VTA or another agency to support consistent, efficient project management and capitalize on the expertise acquired over time by implementing parties. However, the agreements should also recognize that extenuating circumstances may make delivery by the Project Applicant more cost-efficient.

Program Criteria and Efficacy

- **What type of mitigation actions can be funded?** Based on extensive community and stakeholder feedback, the project team recommends accommodating a diverse suite of mitigation actions that could include financial incentives, capital improvements projects, programs, services, and operational efforts.

Monitoring

- **What is evaluated?** The Program Sponsor and participating lead agencies must agree upon what will be evaluated to confirm successful implementation of VMT mitigation actions. The project team recommends including the following, as a minimum:
  - Timing of implementation
  - Evidence and frequency of monitoring for VMT reduction effectiveness and additionality
  - Mitigation life span
  - Effective cadence for ongoing monitoring
  - Method for meeting CEQA-mandated Mitigation, Monitoring and Reporting Program (MMRP) requirements

- **Who evaluates the mitigation actions?** The project team recommends development of a VMT Mitigation Action Review Team which would evaluate the mitigation actions for potential inclusion in the program. As discussed in **Chapter 4**, the composition of this VMT Mitigation Action Review Team has yet to be determined but would provide a form of objective oversight of identification and prioritization of mitigation actions in accordance with program objectives and the Equitable VMT Mitigation Program Framework. If VTA is the Program Sponsor and the review team is hosted by VTA, consideration would need to be given to how the VMT Mitigation Action Review Team would relate to VTA's existing operating structures (e.g., Board Committees).
- **How frequently does evaluation occur?** The project team recommends that evaluation occur according to the frequency negotiated between the Program Sponsor and each Lead Agency. This provides flexibility and accountability tailored to each Lead Agency's unique context and constraints.

CEQA Compliance

- **What is the CEQA mitigation potential for a development project?** The project team estimates that the mitigation potential will range from partial to full mitigation, depending upon the magnitude and duration of VMT mitigation actions selected by a given project. The agreement between the Program Sponsor and Lead Agency will define the availability and life span of the selected VMT mitigation action.

Remaining details of program specifications for a VMT exchange will need to be discussed in detail by VTA staff, lead agencies, and their respective legal counsels to understand and define how this program could function with respect to existing organizational structures and legal obligations.

5.2.2 Long-Term: VMT Bank

A VMT bank, the preferred program structure for long-term implementation, administrative decisions, and considerations to incorporate into program specifications for a VMT bank are presented in **Figure 14. Figure 15** includes several options for VMT bank administrative specifications, presented as questions. Additional considerations for the potential evolution of a program into a VMT bank are summarized after these figures.

VMT Bank

Implementation	Considerations
Step 1 **Determine Scale/Scope**	There are advantages and disadvantages to creating a Bank with a larger scale/scope. However, multiple agencies must be willing to accept the Bank's mitigation options for a state or regional Bank to be feasible. Larger regions can: *Decrease costs associated with running the Bank *Decrease local authority over mitigation options *Increase efficiency and effectiveness of the program
Step 2 **Determine Sponsor**	There are a few organizational components to consider when creating a mitigation Bank. These elements include: *Administrative - The Bank must perform several administrative functions such as collecting fees, managing information, answering questions, and other business operations. *Technical - There is a significant amount of technical work needed to initially and continually prove the mitigation options reduce VMT and that the reductions would not have occurred without the programs. The Bank also needs to show the fees it receives are related and proportional to new development. *Accounting - The Bank requires a thorough accounting system to track collected fees and to ensure fees are being handled according to CEQA and other legal guidelines. This includes payments for implementing VMT reduction projects. Agencies should consider their ability to perform these roles when deciding whether the Bank should be run internally or by a third party.
Step 3 **Formally Establish Bank & Review Team**	The entity creating the Bank must legally formalize its creation. If the intent is for the Bank to be used by multiple agencies, this may require a joint powers authority or equivalent. A review team should be used to verify the effectiveness of mitigation options based on substantial evidence. This team could be internal to the entity creating the bank or an independent third party. Potential third party entities that could function as a review team include public agencies such as those listed below. *Caltrans - local office *ARB *CalEPA
Step 4 **Determine & Prioritize Mitigation Options**	The Bank Sponsor creates a list of mitigation options. The Review Team evaluates the list to ensure it complies with relevant requirements. The Sponsor should consider the following elements when prioritizing options: *Equity *Timeliness of Implementation *Cost Mitigation options can include: *Infrastructure projects *Programs/incentives (Unlike infrastructure projects, programs/incentives are ongoing activities. Because programs/incentives must be continually maintained to be effective, agencies should consider if developers must pay for them indefinitely.
Step 5 **Administer Bank**	The public agency or entity sponsoring a Bank may not always be the lead agency on a project. In this situation the Sponsor should develop an agreement with the lead agency that allows the Bank's mitigation options to be considered an acceptable mitigation measure for the EIR. Banks must continue to prove that their mitigation options reduce VMT and that the reduction would not have occurred without the projects/programs. CEQA review of the Exchange creation may be required to be considered as a formal mitigation program.

Procedural Flowchart

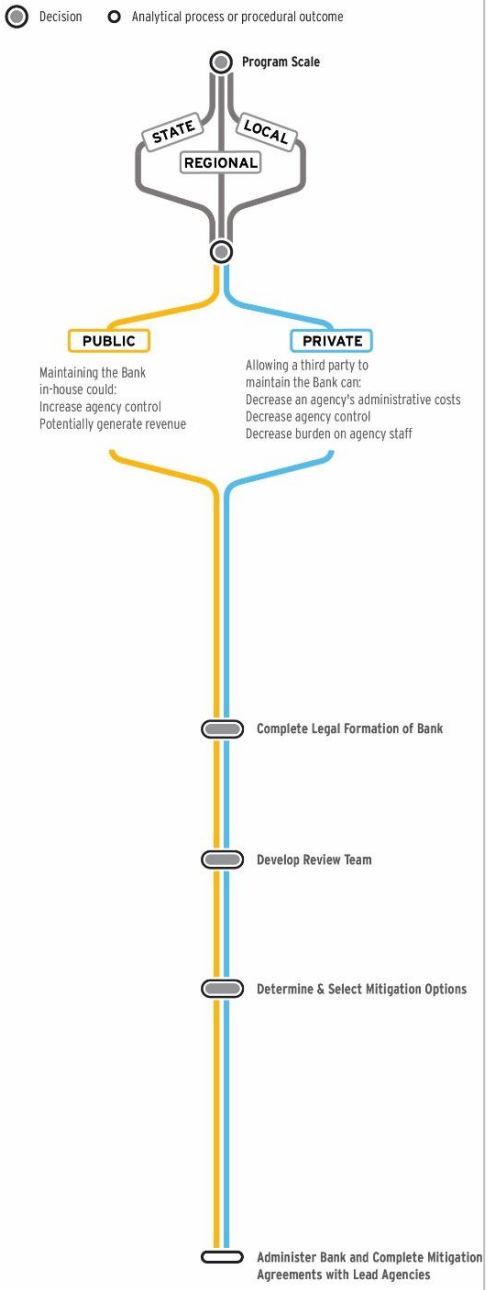


Figure 14: VMT Bank Implementation Flow Chart

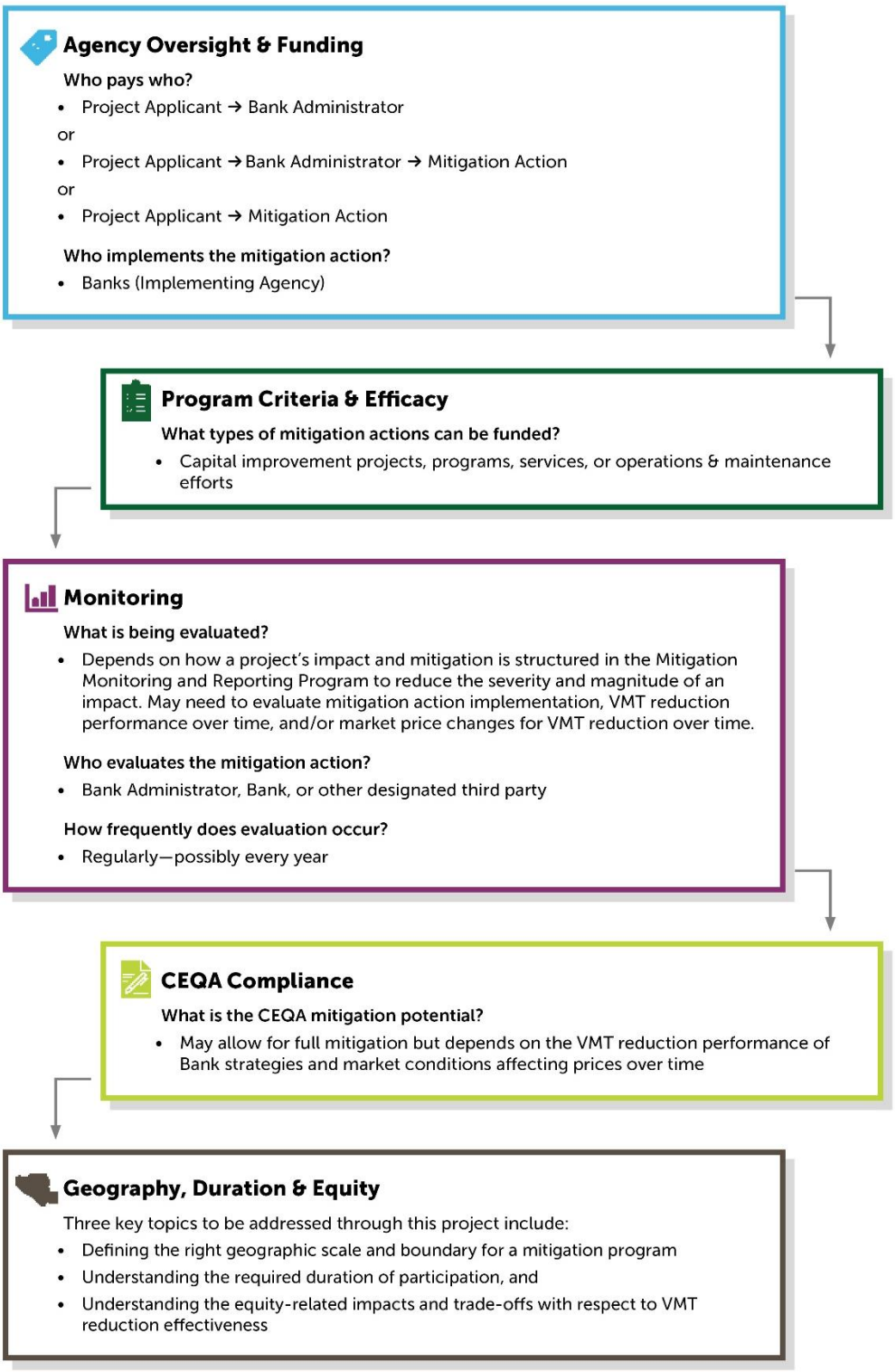


Figure 15: VMT Bank Administration Questions

These considerations, as well as the program structure outlined earlier in **Chapter 5** should be kept in mind during a potential implementation phase for a VMT exchange, as it may be possible to anticipate and capitalize on opportunities to streamline a long-term transition to a VMT bank. Furthermore, periodic review of these considerations is advisable as the VMT Mitigation Action Review Team conducts evaluations of potential VMT reduction projects and implemented VMT mitigation actions which may be conducive to a VMT bank structure.

The project team identified the following considerations and/or recommendations for program specifications for a VMT bank to keep in mind at this early stage:

Agency Oversight and Funding

- **Who pays who?** In a VMT bank, the Project Applicant pays VMT mitigation funds to the bank administrator, which provides a streamlined process for all parties. The bank, however, would both manage ongoing program funding and be authorized to aggregate capital for major project delivery of larger mitigation projects/actions. Regarding who serves as the bank administrator, it may be beneficial for the bank to be established as a standalone entity, rather than a function within the sponsor agency (e.g., VTA). This would enable the bank to more nimbly combine VMT mitigation funds with other funding sources to provide more comprehensive project or program delivery and/or have the ability to incur debt to accelerate project delivery. This need not be decided immediately, but anticipating and forecasting pros and cons of different structures early supports a smoother transition from a VMT exchange.
- **Who implements the mitigation action?** The bank administrator will collect funds until enough have been accumulated to deliver a qualified mitigation action, and then transmit those funds to the agency responsible for implementing that action.

Program Criteria and Efficacy

- **What type of mitigation actions can be funded?** Once again, this program structure can accommodate the desired diverse suite of mitigation actions, including financial incentives, capital projects, and services/operational efforts.

Monitoring

- **What is evaluated?** The Program Sponsor and Lead Agency must agree upon what will be evaluated to confirm successful implementation of VMT mitigation actions. As indicated for the VMT exchange, it is crucial that monitoring of VMT reduction actions include a description of when and where the measure was implemented so those who paid mitigation funds mitigate their impact. In addition to those items identified for the VMT exchange, the project team recommends including changes in the market value of VMT reduction credits over time.

- **Who evaluates the mitigation action?** The project team recommends continued reliance on a VMT Mitigation Action Review Team and the selection process for VMT mitigation actions developed to support evaluation of the VMT exchange. Given the nuanced technical elements of a bank operation it may be advisable to incorporate members into the review team who can speak to specific elements of program evaluations. This should be discussed by the Program Sponsor and its legal counsel.
- **How frequently does evaluation occur?** The project team recommends regular evaluation of program evaluation. An annual evaluation may be advisable, though the cadence ultimately depends upon the frequency negotiated between the Program Sponsor and each Lead Agency.

CEQA Compliance

- **What is the CEQA mitigation potential for a development project?** Based on available data, the project team estimates this structure may allow for full mitigation if rigorous data collection and analysis supports such a conclusion; however, this is subject to the availability of data and lifespan of mitigation actions. The rather onerous analysis and documentation requirements to provide substantial evidence for VMT mitigation via the bank format is one reason this is recommended as the long-term option. Data and expertise acquired during operation of the VMT exchange may provide information that supports more accurate or robust documentation of mitigation under a VMT bank structure. The agreement between the Program Sponsor and Lead Agency will define the availability and life span of the selected VMT mitigation action.

All remaining details of program specifications for a VMT bank will need to be discussed in detail by the Program Sponsor, participating lead agencies, and their respective legal counsels to detail how this program could function with respect to existing organizational structures and legal obligations. Program specifications must also account for and track the legal requirements described in the 5.3 Legal Basis and Justification section that follows.

5.2.3 Implementation Roles, Responsibilities, and Timeframe

As program specifications are developed during an implementation phase, the Administering Agency's roles and responsibilities must be defined. Key areas of focus are outlined in **Table 23**.

Table 23: Roles for the Administering Agency

Area of Focus	Responsibilities
Administrative	• Business operations, including tracking the cost of administering the program and ensuring VMT mitigation funds help defray these costs • Compile and periodically update mitigation program documents • Coordinate with development applicants and partner firms
Technical	• Calculate VMT mitigation action costs and VMT reduction effectiveness • Verify applications to fund mitigation actions • Monitor and report on program • Monitor and report VMT mitigation action implementation and effectiveness toward program performance metrics
Accounting	• Receive, aggregate, and disperse funds • Track payments • Ensure all legal guidelines and CEQA requirements applicable to its role are met

Source: Fehr & Peers, 2024.

Full specifications for a potential VMT mitigation program are yet to be defined, but it is possible to identify several anticipated steps for program operation. These steps, detailed in **Table 24** in order of implementation, include considerations for both VMT exchange and VMT bank implementation. The groundwork for these steps has been laid in this framework, so a future implementation phase can build on this planning effort.

Table 24: VMT Mitigation Program Operation Process

Step	Description
Program Initiation	• Program Sponsor allocates funding and receives any necessary approvals to form the mitigation program. This step includes evaluating and accounting for ongoing administrative costs. • Program Sponsor develops a governing document that outlines and formalizes the process and procedures the program would adhere to. • Operating or purchase agreements between participating agencies and the Program Sponsor are established.
Mitigation Action List Development	• Administering Agency, in consultation with any partner agencies, develops a list of mitigation actions to include in the initial program. This work would be performed and/or overseen by the VMT Mitigation Action Review Team. This work should include a range of mitigation actions anticipated to meet the demand of small, mid-sized, and large land use projects in the County.
Quantify Reductions and Costs	• Administering Agency estimates the cost and VMT reduction potential of mitigation actions. Costs incorporated into this evaluation include capital and administrative costs for the action as well as compensation for anticipated CBO or third-party implementation partners. • Participating agencies submit documentation of mitigation project/program details.
VMT Impact and Reduction Needs Identified	• Lead agencies and/or developers identify VMT impacts and the amount of VMT reduction needed through the CEQA process. • Lead Agency delivering or approving the land use project with VMT impacts contacts Administering Agency.
Mitigation Action Assigned to Impact	• Administering Agency matches mitigation reduction needed to offset identified VMT impact with available mitigation action(s) (i.e., determines its fair share of mitigation required and the mitigation action(s) adequate to meet the need) • Lead Agency and/or developer makes financial contribution to the Administering Agency. • Mitigation action(s), or consumed portions thereof, are removed from program list. In the case of a VMT bank, this is the removal of credits from the register.
Implementation of VMT Reducing Mitigation	• Administering Agency works with the Implementing Agency to fund, oversee, and coordinate the implementation of the VMT mitigation action(s). • Alternatively, if implementation by a partner agency or the Project Applicant is an option, the Administering Agency provides funds to the partner agency or confirms delivery by the applicant to implement the VMT mitigation action(s).
Additionality Verification	• The Administering Agency verifies that the mitigation action(s) meet the additionality test, and that the calculations and assumptions for the costs and VMT reduction potential are clearly documented and consistently applied.
Monitoring and Reporting	• Administering Agency collects information on mitigation action delivery effectiveness. • Administering Agency periodically updates public-facing document summarizing the outcome of monitoring and reporting.
Mitigation List Updated	• Administering Agency periodically updates the mitigation action list, using the latest information available including data collected during monitoring. • The process for updating the list mirrors the selection process for VMT mitigation actions in the program. This work would be performed and/or overseen by the VMT mitigation program action review ream.

Source: Fehr & Peers, 2024.

5.3 Legal Basis and Justification

The program would be subject to statutory or legal requirements that govern or influence the development of all types of mitigation programs. **Table 25** outlines these requirements and explains how they would be fulfilled by this program, whether structured as a VMT exchange or VMT bank. These items are derived from the California Code and Fish and Game Code (FGC §1852) governing regional conservation investment strategies; the concepts in that code have been extrapolated to apply to a VMT program and is a good way to describe the framework. Additionally, numerous legal and practical considerations would need to be identified, negotiated, and defined in agreements between the Program Sponsor and participating lead agencies, as well as between lead agencies and Project Applicants. This section serves as a starting point for developing these future agreements.

Table 25: VMT Mitigation Program Framework: Legal Considerations

Legal Requirements	How Requirement is Met for a VMT Exchange or VMT Bank
According to Fish & Game Code §1852(c) regional conservation investment strategy shall include:	Description of how the program would meet the legal requirement along with the location of corroborating information presented in this report.
(1) An explanation of the VMT mitigation purpose of and need for the exchange.	The program would be explicitly designed to address mitigation of VMT – an identified environmental impact of land use development which would not be mitigated in the absence of the program. It is recommended that this be described in an introduction to program specifications and/or key governing documents. **Chapter 1** presents the overall Project goals and objectives. **Chapter 2** presents a summary of local mitigation practices and needs.
(2) The geographic area covered by the bank or exchange and rationale for the selection of the area, together with a description of the existing transportation and development dynamics that provide relevant context for the development of the exchange.	The program would apply broadly to Santa Clara County – the geography served by the Santa Clara Valley Transportation Authority (VTA). Each mitigation action would serve a unique geographic context and community located within Santa Clara County. It is recommended this be described in an introduction to program specifications and/or key governing documents. **Chapter 2** details the land use and transportation dynamics contributing to excess VMT in Santa Clara County.

Legal Requirements	How Requirement is Met for a VMT Exchange or VMT Bank
(3) The public transit and VMT reduction opportunities currently located within the exchange area.	Transit conditions and VMT reduction opportunities vary throughout Santa Clara County and its member jurisdictions. It is recommended that this be described in an introduction to program specifications and/or key governing documents pertaining more directly to mitigation actions, Project Applicant MOUs, and/or legal agreements between the Program Sponsor and lead agencies. **Chapter 2** details the land use and transportation dynamics contributing to excess VMT in Santa Clara County. **Chapter 3** and portions of **Chapter 4** and **Chapter 5** present the results of engagement with local jurisdictions and community members which includes discussion of existing public transit service and VMT reduction opportunities, or lack thereof.
(4) Important residential and commercial communities and transportation resources within the exchange area, and an explanation of the criteria, data, and methods used to identify those important communities and resources.	The Equitable VMT Mitigation Program Framework is designed to focus mitigation actions on equity priority area populations. It is recommended that this be described in an introduction to program specifications and/or key governing documents. **Chapter 1** presents the project approach and identification of the equity priority areas – MTC's Equity Priority Communities and the Alviso neighborhood in San José. **Chapter 3** presents the results of engagement with community members and describes population demographics and transportation resources within the exchange area.
(5-6) A summary of historic, current, and projected future transportation stressors and pressures in the exchange area, including economic, population growth and development trends	Santa Clara County, and its member jurisdictions, face myriad land use, transportation, and residential and employee population growth stressors. It is recommended that this be described in an introduction to program specifications and/or key governing documents. **Chapter 2** describes the transportation and land use development context for Santa Clara County and factors contributing to excess VMT.
(7) Provisions ensuring that the exchange will comply with all applicable state and local legal and other requirements and does not preempt the authority of local agencies to implement infrastructure and urban development in local general plans.	When developing VMT mitigation actions for inclusion in the program, the Program Sponsor and its review team will consult applicable state, regional, and local adopted plans and policies to ensure actions are compliant with such plans. It is recommended that agreements between the Program Sponsor and each Lead Agency affirm this approach. **Chapter 4** describes examples of documentation referenced in the development of VMT mitigation actions. **Chapter 5** describes some of the legal considerations recommended for inclusion in the program specifications and/or legal agreements between the Program Sponsor and lead agencies.

Legal Requirements	How Requirement is Met for a VMT Exchange or VMT Bank
(8) VMT mitigation goals and measurable objectives for regional transportation resources and important mitigation elements identified in the plan that address or respond to the identified stressors and pressures on transportation within the exchange area.	The intent of the program is to reduce VMT and expand travel options for people to get around Santa Clara County in a way that works across jurisdictional lines and improves equity, especially for communities that need it the most. It is recommended that this be described in an introduction to program specifications and/or key governing documents pertaining more directly to mitigation actions, Project Applicant MOUs, and/or legal agreements between the Program Sponsor and lead agencies. **Chapter 1** presents the goals and objectives for the program. **Chapter 2** presents a summary of local mitigation practices and needs, including anticipated excess VMT and Equitable VMT Reduction Definition Performance Metrics, assuming a target of 85 percent of the baseline total VMT per service population rate. **Chapter 4** presents the evaluation of proposed VMT reduction measures relative to the performance metrics.
(9) VMT mitigation projects, including a description of specific projects that, if implemented, could achieve the mitigation goals and objectives, and a description of how the mitigation projects were prioritized and selected in relation to the mitigation goals and objectives	The program presents VMT mitigation actions proposed for inclusion in the program along with a points-based prioritization scheme which can be used to evaluate additional future measures. A VMT Mitigation Action Review Team would iterate on this approach and perform evaluations for the program. It is recommended that this approach and robust documentation of anticipated VMT reduction quantification be incorporated into Project Applicant MOUs, and/or legal agreements between the Program Sponsor and lead agencies. **Chapter 3** presents the ranking of VMT reduction measure categories according to community priorities. **Chapter 4** presents the proposed VMT reduction measures, their respective attributes and VMT reduction efficacy, and evaluation relative to the performance metrics.
(10-11) Provisions ensuring that the exchange plan is consistent with and complements any local, regional, or federal transportation or congestion management plan that overlaps with the exchange area, a summary of any such plans, and an explanation of such consistency.	Similar to provision 7, this will be accounted for during the development of VMT mitigation actions for inclusion in the program and will have been accounted for under existing planning processes that generate transportation projects for consideration as possible VMT mitigation actions. It is recommended that agreements between the Program Sponsor and each Lead Agency affirm this approach. **Chapter 4** describes examples of documentation referenced in the development of VMT mitigation actions. **Chapter 5** describes some of the legal considerations recommended for inclusion in the program specifications and/or legal agreement between the Program Sponsor and lead agencies.

Sources: Implementing SB 743 An Analysis of Vehicles Miles Traveled Banking and Exchange Frameworks, October 2018, Institute of Transportation Studies, U.C. Berkeley; 2019 California Environmental Quality Act (CEQA) Statute & Guidelines, Association of Environmental Professionals, 2019.

In addition to the legal requirements specified above, this section details a few broad legal considerations the program must address.

5.3.1 Verification of VMT Reduction Potential

VMT reduction potential would be evaluated throughout the VMT mitigation action selection process and documented. Prevailing best practices in VMT reduction quantification would be applied to this analysis and may be incorporated into analysis of data collected over time. Long-term, it may be worth considering whether the program's Administering Agency could assess VMT impacts at a regional level through a Regional Transportation Plan or Sustainable Communities Strategy, along with the corresponding Environmental Impact Report (EIR). Local jurisdictions could then adopt this plan, allowing developments to be pre-approved for VMT mitigation (with local, county, and regional VMT mitigation actions), provided they are included within the EIR's scope. Either way, the question is how this information is operationalized.

Regarding the timing and duration of VMT mitigation, mitigation action implementation timing is up for negotiation and would be decided between the Program Sponsor and Lead Agency and documented in legal agreements between these parties. This is nuanced because such agreements need to consider existing development agreements, monitoring reporting requirements, and more. Ultimately, the required timing of completing a mitigation action is not defined under CEQA but may be negotiated in a development agreement or a MMRP.

Furthermore, CEQA does not require mitigations to occur in perpetuity, but rather when the impact would be present. This could be tied to the life of the land use project unless something removes the impact throughout the life of the project. The planning horizon of the General Plan or Regional Transportation Plan may be a reasonable lifespan. The key for any mitigation lifespan is to tie it to substantial evidence, and for the mitigation to be present when the impact has been confirmed to be present through technical analysis.

5.3.2 Additionality: Considerations and How it Would be Confirmed

As alluded to previously, additionality is the concept that a mitigation action proposed to offset a project's significant impact under CEQA would not otherwise occur without the project's approval and associated commitment by the Lead Agency, Project Applicant, and any other relevant parties to implement the action. A precise accounting of additionality is not required by CEQA. However, VTA and the stakeholders have indicated their preference that a regional countywide VMT program be able to demonstrate that, without the program, the mitigation action would not occur. Demonstrating that the mitigation would not be funded, constructed, or otherwise implemented if not for the program can be called the "additionality test."

Partially funded projects could be considered for inclusion in a regional VMT mitigation program and still meet the additionality test. This would enable the program to supplement funding for a VMT reduction action which has stalled for one reason or another, but which offers valuable mitigation potential. The administrator's conclusion to include a partially funded VMT mitigation

action should be based on substantial evidence with clear reasoning. The ability of the administrator to include partially committed projects and programs would ultimately be dependent on acceptance of legal risk and should be discussed with legal counsel.

One element that could strengthen the ability to include partially funded mitigations would be to demonstrate that existing funding sources are insufficient to fully fund the mitigation. Furthermore, the administrator would demonstrate that no other additional funds are likely to close that funding gap within a foreseeable time period.

Another option for incorporating a partially funded or implemented mitigation would be to account and credit only the incremental mitigation benefits directly caused by the specific partial funding or implementation support provided by the bank or exchange. The administrator would then determine how much of the VMT reduction resulting from the mitigation is directly attributable to the regional VMT mitigation program's contribution, such as with additional funding for an existing program that will result in directly proportional VMT benefits.

The project team recommends documenting all additionality considerations and related analysis throughout the VMT mitigation action selection process. Summary documentation affirming passage of the additionality test should be incorporated into and/or cited by the program's governing legal agreements and those pertaining to implementation of the mitigation action.

5.3.3 Relationship to Existing Transportation Mitigation Practices

Many local jurisdictions have adopted transportation impact fees and there are myriad other planned and funded capital improvement programs associated with the Countywide Congestion Management Program or other locally adopted transportation plans or the Countywide Congestion Management Program. Having a local impact fee would not preclude a local jurisdiction from participating in this potential VMT mitigation program. A local fee program is for future developments to contribute their fair share to capital improvements within the local jurisdiction that address the transportation needs of that future development. Paying a local jurisdiction impact fee is typically part of implementing a local jurisdiction's General Plan.

On the other hand, CEQA is a disclosure process to identify a project's direct, indirect, and cumulative impact on the environment. Identifying a VMT impact and the associated mitigation of that impact occurs independent of implementing the General Plan. It is at the Lead Agency's discretion to determine if the VMT mitigation program delivers feasible VMT mitigation for their local context.

5.3.4 Monitoring and Reporting

In most CEQA contexts, the MMRP requires the Lead Agency to determine if required mitigation measures have been implemented and does not require the Lead Agency to review previously completed mitigations and prove they have been effective. However, before a mitigation measure can be required, the Lead Agency needs to provide substantial evidence to support their determination that the mitigation is both feasible and effective. Given that context,

monitoring VMT mitigation actions for effectiveness may be useful to provide data to build evidence for expanding or implementing future programs, and to provide transparency that builds confidence in the program among members of the public, staff, and elected officials. Furthermore, if the program is structured as a VMT bank, the bank administrator will need to demonstrate the effectiveness of the mitigation actions to support the valuation of VMT reduction credits.

Monitoring options included in a countywide VMT mitigation program would vary by individual mitigation action, but all would likely be most effective if conducted on a regular basis. Regular monitoring would convey additional benefits. The results of monitoring could be used to help decide which mitigation actions are conveying the most value and should remain on the mitigation list and which should be removed over time. This approach would enable a more flexible, evidence-based implementation program, though it would likely require additional effort from the Administering Agency. The duration and extent of monitoring of past VMT mitigation actions will need to balance monitoring burden and benefits in terms of additional information. Local Transportation Management Associations (TMAs) may be able to play a role here, as they often have experience with conducting travel surveys and monitoring usage of VMT and trip reduction strategies.

5.3.5 Equity: Additional Considerations

While CEQA does not require equity considerations, the VTA has made equity a fundamental expectation of this mitigation program. It is incumbent upon the Program Sponsor and future review team to ensure ongoing monitoring or evaluation of program implementation and/or analysis contributing to the selection of VMT mitigation actions refer back to the equity metrics described in this report and support quantification of these outcomes. Reflection on how these metrics are being achieved by the program may be used to iteratively adjust program specifications to support desired VMT reductions countywide.

Further, there are other aspects of state law where equity is an important element. For example, state legislation and California General Plan requirements require local jurisdictions to incorporate environmental justice considerations and mitigation actions into General Plans. California Senate Bill 1000 (SB 1000), adopted in 2016, requires cities and counties to incorporate environmental justice policies into their General Plans to address the needs of disadvantaged communities, focusing on reducing health risks, promoting equitable access to resources, and encouraging public participation in decision-making processes. Pursuing the identified equity outcomes in this VMT mitigation program will support local jurisdictions in meeting this broader SB 1000 requirement. Furthermore, adhering to the SB 1000 requirements for equitable engagement that includes the meaningful involvement of all people regardless of race, color, national origin, or income is advisable, so the program outcomes continue to be aligned with the state requirement.

5.3.6 Practical Considerations

Ensuring the long-term success and effectiveness of a VMT mitigation program requires consideration of several other practical concerns. Costs included in analysis need to be comprehensive and include administrating agency overhead costs, action-specific costs, and the costs of any CBOs or partner entities expected to support implementation. If not accounted for, the mitigation costs will not cover program delivery. Additionally, the mechanism by which programmatic actions will be funded by sporadic mitigation funding needs to be considered.

A VMT bank, though difficult to implement, may ultimately provide the desired flexibility to deliver VMT mitigation actions independently or with larger capital projects. It allows for pooling of funds to enable large-scale mitigation efforts and can be easily applicable to small to large developments. In the absence of a bank, it is likely the program will at least occasionally burden small and mid-sized development projects with mitigation costs that exceed demand if an effective credit system is not included. This may deter such projects from being undertaken, incentivizing development toward larger projects in hotter market areas. Similarly, consideration must be given to the timing of mitigation payments and ensure the mitigation payment timeline is feasible for Project Applicant s (i.e., does not require too condensed or drawn-out of a payment cycle incompatible with a developer's cashflow).

Lastly, the Program Sponsor and others should continue to investigate creative solutions to growing the funding pot. In the future, it may be feasible to monetize co-benefits and engage additional partners for funding the non-VMT-reducing components of projects. This should be considered in greater detail and a bank structure could be leveraged to aggregate funds from different sources. This would be particularly important if community input indicates a VMT reducing project will not have value in the absence of certain other investments.

5.4 Conclusion and Near-Term Next Steps

Over the course of developing this Equitable VMT Mitigation Program Framework the project team, in partnership with VTA and its local jurisdictions, laid the groundwork for a countywide VMT mitigation program in Santa Clara County (detailed in **Table 25**).

This report represents the initial step in the effort to develop an Equitable VMT Mitigation Program for Santa Clara County, providing a foundation that VTA and interested local jurisdictions can build on to pursue an implementation phase and initiate a program. Anticipated near-term steps building on this work include:

- VTA staff bring the Equitable VMT Mitigation Program report to VTA Committees and the VTA Board in early 2025, to review and potentially accept the framework.
- VTA and local jurisdiction staff scope an implementation phase via continued working meetings with technical staff and initial discussions with legal counsel. A key consideration will be how to fund an implementation phase, and what, if any, commitment would be involved when a local jurisdiction participates in the implementation phase.
- Solicit interest from local jurisdictions on whether to opt in to an implementation phase which would focus on determining program details and developing agreements between local jurisdictions and the Program Sponsor.
- Establish a VMT Mitigation Action Review Team to help administer and monitor the program.

At the conclusion of the implementation phase, an initial or pilot VMT mitigation program would be ready to launch. With thoughtful planning and the integration of the considerations and recommendations outlined in this framework, this program has the potential to achieve significant outcomes for Santa Clara County:

- Provide local jurisdictions with another option for reducing VMT from land development projects, helping with environmental review and local housing and job production goals
- Streamline the environmental review process for developers, reducing uncertainty and saving time and money
- Provide transportation improvements targeted toward lower-income households and other members of equity communities, helping them get to work, school, shops, and other places they need to go
- Provide more transportation options for all community members and reduce overall driving, noise pollution, and pedestrian and bicyclist exposure to car crashes
- Improve the environment in general because reducing the amount of driving helps reduce Greenhouse Gas Emissions, improve local air quality, and meet state climate goals.