



Equitable VMT Mitigation Program for Santa Clara County

PREPARED FOR



VALLEY TRANSPORTATION AUTHORITY
3331 North First Street
San Jose CA 95134

PREPARED BY



FEHR & PEERS
60 S Market St Suite 700
San Jose CA 95113

Contract No. S22229

Equitable VMT Mitigation Program for Santa Clara County

Final Program Framework
Executive Summary

For VTA Board Consideration

January 2025

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.

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.

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.

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.

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.

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).

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.

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)¹ 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 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) 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 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

¹ 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.

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 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 positive 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.

Project Process

This framework was developed by a project team comprised of transportation, economic analysis, and environmental planning professionals 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 during these three phases included the following:

- More than a dozen in-person events
- More than 35 online events and meetings
- 20 stakeholder interviews
- Engagement with more than 30 CBOs and other organizations
- Presentations at 14 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 1,250 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.

SELECTION PROCESS FOR VMT MITIGATION ACTIONS

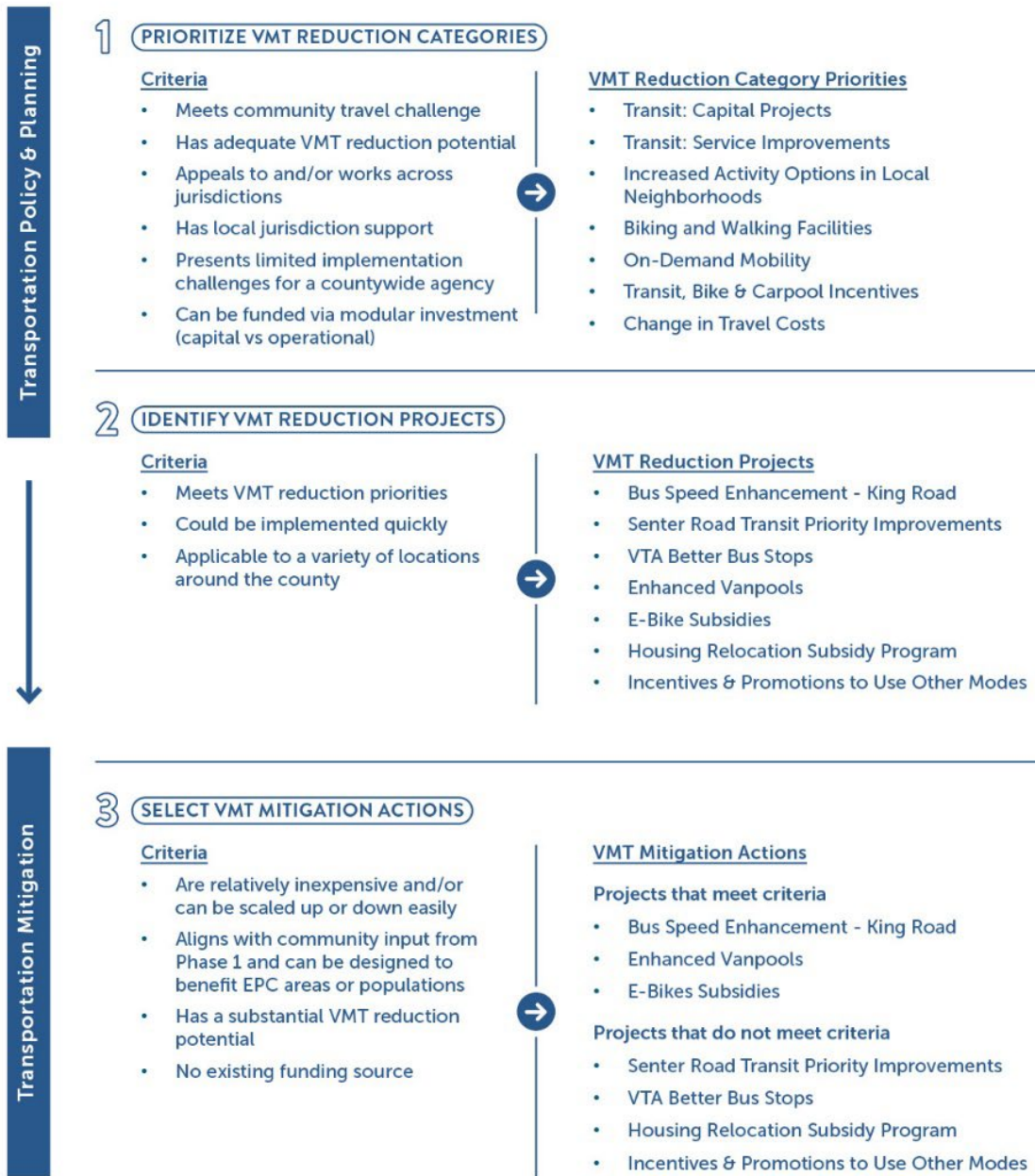


Figure ES-1: VMT Mitigation Action Prioritization Scheme

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. Feedback from the community highlighted interest in the following:

- **Transit services that are faster and more reliable:** Because of the need to implement VMT reduction 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” requirement.
 - 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 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, and statutory requirements for the VMT mitigation program, and implementation guidance for the Program Sponsor. 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 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:** Service 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, expansion of transit into formerly unserved areas, and 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 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 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 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).

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 VMT mitigation actions 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 VMT mitigation actions 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 into 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

Step 2
Determine Sponsor

Step 3
Determine & Propose
Mitigation Options

Step 4
Develop Review Team

Step 5
Administer Exchange

Considerations

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

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.

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.

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.

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

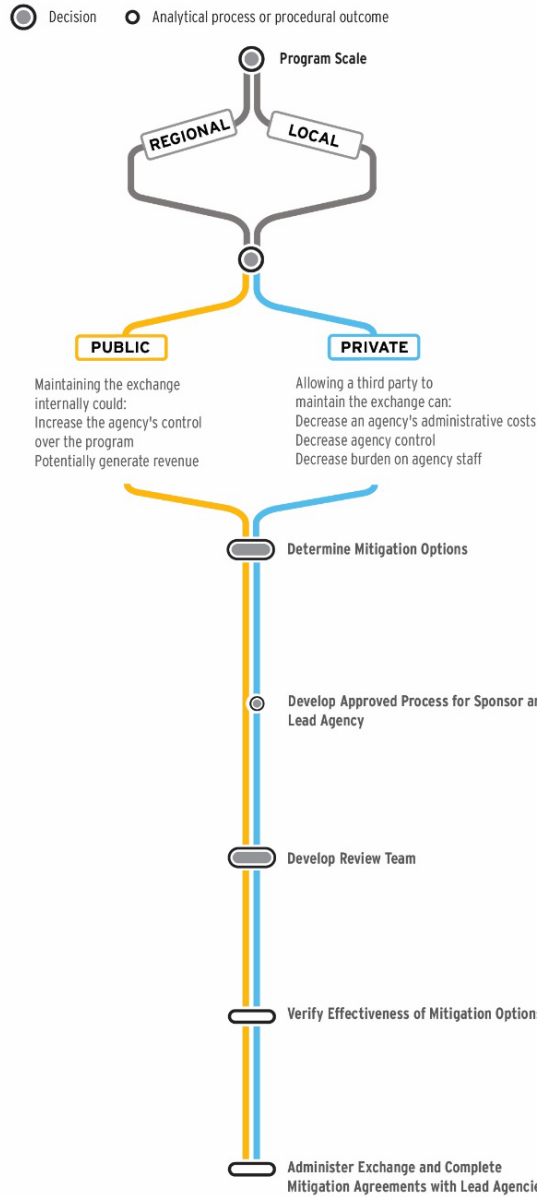


Figure ES-2: VMT Exchange Implementation Flow Chart

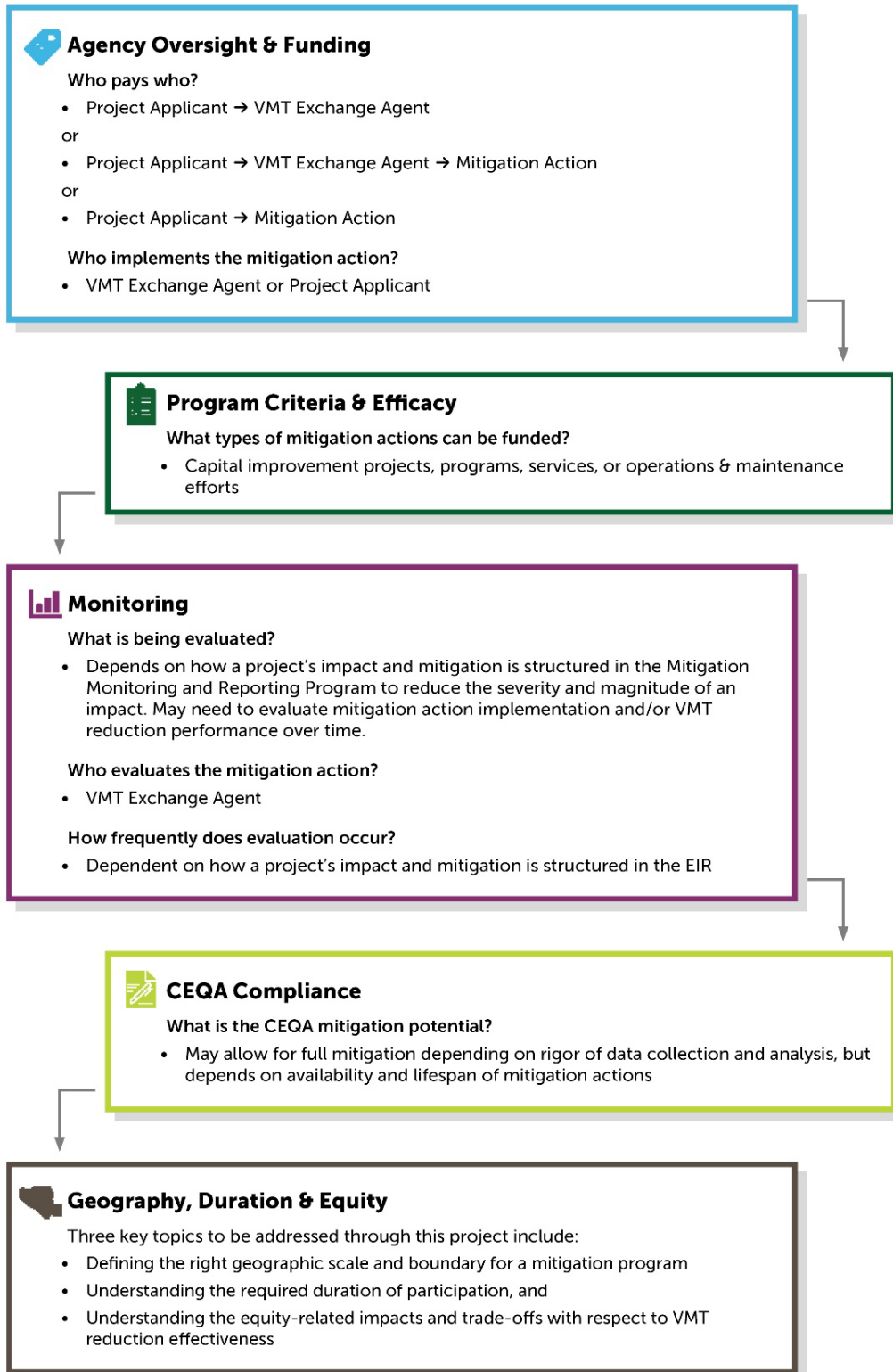


Figure ES-3: VMT Exchange Administration Questions

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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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 according to program performance metrics
Accounting	<ul style="list-style-type: none">• 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 order of implementation in **Table ES-2**, 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	<ul style="list-style-type: none"> • 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 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Administering Agency works with the Implementing Agency to fund, oversee, and coordinate 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	<ul style="list-style-type: none"> • The Administering Agency verifies that the mitigation action(s) meet the additionality test, and that calculations and assumptions for the costs and VMT reduction potential are clearly documented and consistently applied.
Monitoring and Reporting	<ul style="list-style-type: none"> • Administering Agency collects information on mitigation action delivery effectiveness. • Administering Agency periodically updates public-facing documents summarizing the outcome of monitoring and reporting.
Mitigation List Updated	<ul style="list-style-type: none"> • 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 team.

Source: Fehr & Peers, 2024.

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. 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 will 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 will develop a conceptual scope for an implementation phase, in consultation with local jurisdiction staff. An implementation phase would focus on determining program details and developing agreements between local jurisdictions and the Program Sponsor.
- VTA will solicit interest from local jurisdictions on whether to opt in to an implementation phase. This will likely involve continued working meetings with local jurisdiction technical staff and may involve initial discussions with legal counsel. A key consideration will be how to fund an implementation phase, and what type of commitment would be involved when a local jurisdiction participates in the implementation phase.
- If there is sufficient interest in proceeding to an implementation phase, VTA and local jurisdictions would establish a VMT Mitigation Action Review Team early in the process 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 integration of considerations and recommendations outlined in this framework, this program has the potential to achieve significant outcomes for Santa Clara County including:

- Providing local jurisdictions with another option for reducing VMT from land use projects, helping with environmental review and local housing and job production goals
- Streamlining the environmental review process for developers, reducing uncertainty and saving time and money
- Providing 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
- Providing additional transportation options for all community members to reduce overall driving, noise pollution, and pedestrian and bicyclist exposure to car crashes
- Improving the environment in general since reducing the amount of driving helps reduce Greenhouse Gas Emissions, improve local air quality, and meet state climate goals.