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To: [Planning Clerk](#)
Cc: [Acevedo, Megan](#); [COB](#)
Subject: Crucial Correction Needed to VMT Policy
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Planning Commissioners,

On Thursday, you will consider adopting a vehicle miles traveled (VMT) policy to establish thresholds and screening criteria for CEQA transportation impacts. The proposed policy establishes 15% below existing per capita VMT as the CEQA significance threshold for new residential and office projects, following guidance from the state.

We support the -15% threshold. However, in order for the calculation of -15% to be defensible, an appropriate baseline for existing VMT must be established. Here, the proposed policy fails completely.

The policy proposes to use the average per capita VMT of residents and employees in unincorporated Humboldt County as the baseline for calculation. That might sound reasonable at first, but it is not. Here's why:

1. The street and road network is completely integrated, and driving behavior is not influenced by jurisdictional boundaries, nor do such boundaries exert much influence on people's choice of where to live.
2. CEQA requires the consideration of foreseeable impacts regardless of jurisdictional boundaries.
3. VMT varies widely across the county, and averaging together the VMT of residents of denser urban and suburban areas (who generally drive much less) with the VMT of rural residents (who generally drive much more) results in a meaningless number.

To put it plainly: it makes no sense to treat residents and employees in Myrtle town or Cutten as if their driving habits have more in common with people in Petrolia than with the Eureka across the street. Residents of Eureka (and presumably adjacent neighborhoods) drive less than 14 miles per day on average, while residents of many rural parts of the county likely drive significantly more than 25 miles per day (see Table 1 [here](#)).

The misguided baseline produces calculations which are indefensible and frankly absurd. This is clearly illustrated in Figures 2 and 3 of the proposed [VMT Threshold Policy Guidelines](#), which show "low VMT" areas where new development would be assumed to have a less than significant CEQA impact (and screened out of additional analysis) because of lower-than-average amounts of driving. The maps claim that some of the most remote, rural, car-dependent parts of the county - places like Petrolia, Dinsmore, and Kettenpom - are "low VMT" for residents and/or employees, a result which should be enough on its face to debunk the calculation. No one can claim with a straight face that residents or employees in such places drive significantly less than average.

The solution is simple: Divide the county into logical regions based on driving patterns, calculate the average VMT in each of these regions - including incorporated areas - and

use that as the baseline for future projects in those regions. A hypothetical example of a logical division of the county might be: Eureka Region, Arcata Region, McKinleyville Region, Fortuna Region, Rural Southern Humboldt Region, Rural Eastern Humboldt Region, and Rural Northern Humboldt Region.

Please note that including the VMT of residents and employees in incorporated cities in the baseline is required for a defensible result. While the county does not have land use jurisdiction in those areas, this is a proposed CEQA policy, and CEQA requires the analysis of impacts regardless of jurisdictional boundaries. The VMT of a new development adjacent to an incorporated city must be compared to a relevant baseline - i.e., one that includes people who live and work in that city.

We strongly urge you to change the baseline VMT figures in order to make the proposed thresholds and screening criteria logical and legally defensible.

In addition to the overarching issue of baseline setting, there are also two significant problems with the county's list of proposed measures for VMT mitigation:

1. Research has consistently found that parking management is one of the most effective VMT reduction tools, but the staff report dismisses it entirely. It offers several justifications, none of which hold up to scrutiny. For example, it says there are "limited alternative transportation modes available," a statement that applies to some parts of the unincorporated county but not others, and also declares that reduced parking would "only increase vehicle miles traveled when searching for parking," an assertion that betrays a lack of knowledge about the tools of parking management (so-called "[cruising for parking](#)" can be addressed by measures including charging the market rate for parking to ensure a desired number of spots stay open). **Parking management must be included as a potential mitigation measure for VMT impacts in appropriate projects.**
2. "Use cleaner fueled vehicles" is proposed as a mitigation measure. While lower-emission vehicles are crucial for addressing issues like air quality and greenhouse gas emissions, they have no effect on VMT. Air quality and greenhouse gas emissions are analyzed separately from VMT under CEQA. **Thus, cleaner fuels are not a potential mitigation measure for VMT impacts.**

Thank you for your consideration of our comments.

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