

VMT Threshold Policy Comments and Responses

#	Public Comment -- Jerome Qiriaz	Response
1	The choice to use a 15% threshold from 2018 OPR guidelines is not consistent with the latest guidance from CARB 2022 Scoping Plan which recommends 25% below 2019 levels.	The 2022 CARB Scoping Plan update sets an overall VMT reduction goal for the State of 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045. This is a per capita reduction based on 2019 levels. In order to achieve these reductions in VMT, there must be reductions in existing trips and not only for new development. While SB 743 requires local governments to use VMT over LOS to assess transportation impacts under CEQA, State law leaves the specific thresholds for defining “significant” impacts and screening criteria to the discretion of each local agency, with the understanding that these must be set through a formal process and supported by evidence. It is not clear if the OPR (now LCI) Guidelines will move to a 25% standard for evaluation of specific VMT thresholds for project analysis under CEQA. The 15% recommendation is consistent with the current LCI guidance. To go beyond that would greatly reduce the areas that screen out due to location and would require a greater level of mitigation for new development that is not screened out.
1.1	The County VMT Study from Fehr & Peers states that lead agencies should be prepared to justify their reasoning when making threshold decisions.	No response required.
1.2	Staff have simply referred to the OPR Guidelines as justification for choosing 15% and does not appear sufficient to lower recommendations from CARB of 25%.	See response 1 above. There is a difference between achieving an overall per capita VMT reduction of 25% and using a 25% threshold for CEQA project screening and mitigation.
1.3	The Regional Transportation Plan (RTP) targets were to be in line with the CARB Scoping Plan.	The RTP selected overall VMT reduction targets of 25% below 2019 levels by 2030 in line with the 2022 CARB Scoping Plan, but did not select VMT thresholds for new development projects.
2	Why are census block groups used for the baseline data set instead of Traffic Analysis Zones (TAZ) from the Humboldt	During preparation of the VMT Study prepared by Fehr & Peers, the Department decided to utilize StreetLight data from 2022 as opposed to

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	County's Travel Demand Model (HCTDM)? TAZ's have a higher resolution, and were also intentionally designed to capture variation in the existing land use of the County.	using the HCTDM (2012 California Household Survey Data) to forecast existing VMT. The cost of StreetLight data was within the budget for the Study, and came in the form of US census block groups. In order to receive StreetLight data in the form of TAZs the County would need to pay extra for data and analysis. In order to use Caltrans' HCTDM, which has TAZs available, the County would need to pay a \$10,000 a year licensing fee, which was not within the budget for the Study. As there is no traffic engineer on staff, there is no one currently in the Department or Public Works who has access to the HCTDM.
3	Streetlight methodology notes.	It should be noted that while StreetLight data may not capture every trip, neither does the HCTDM which is based on 2012 California Household Surveys and is highly conservative.
4	Consider using a city-based VMT baseline for Unincorporated areas within the Sphere of Influence of the applicable City if the baseline for that City is less than that of Unincorporated County. This would require mitigation strategies to more projects.	This would greatly complicate the screening program. This would multiply the number of baseline VMT averages for HBX and HBW resulting in 11 baselines. This would also change the dataset that is currently available in the Web GIS, and would require a significant amount of work hours to complete.
4.1	Consider treating McKinleyville like a City and applying the same approach above.	This would result in 12 baselines, if included in the comment above, for VMT and complicate the Policy significantly.
5	Nordic Aquafarms example in VMT Study by Fehr & Peers represents an example of applying the policy to industrial projects. There is a lack of clarity on whether the policy would be applied to industrial projects.	The Policy is applicable to industrial projects. An industrial project that generates less than 110 trips, is located in a Low-VMT area for Employees (HBW) or is located within a half mile of a major transit stop would be considered to have a less than significant impact to transportation. While this would screen out a project's requirement for a detailed transportation analysis, this would still require environmental impact analysis of other resource areas.
6	The justification to the use 2022 VMT data through 2030 does not align with the RTP targets of 25% reduction in VMT by 2030.	As stated above, the RTP does set overall VMT reduction goals for the County. The RTP, however, does not set thresholds of significance for projects under CEQA.

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6.1	Please identify a better justification for not needing to update the baseline VMT.	While the RTP identifies a 1% population increase rate in Humboldt County, this does not reflect the current trends that population is declining. There are no significant changes to housing stock in the County and travel patterns are not likely to increase VMT in the next 5 years. As stated in the Fehr & Peers Study, use of the base year as the project year in areas with little or no growth is considered acceptable.
6.2	Please clarify when the next baseline VMT will be targeted for completion. Is the intent to release an update in 2030?	A reassessment will be done in 2030 to determine if there is a need to update the baseline VMT. This will be added to the guidelines.
7.1	Thresholds are offered for residential, office, retail and redevelopment projects. However, the VMT Metrics section indicates that industrial and commercial projects are included, yet there is no reference to these types of projects in the Screening Criteria Table 1. Please clarify.	Industrial and commercial projects would be considered employment projects and would be required to adhere to the average VMT HBW for workers. The language in the VMT Threshold Policy Guidelines will be updated to reflect this, and "office" projects will be called out as "employment" projects.
7.2	Please align the four bullets under this Thresholds of Significance Section with Table 1 and the Project VMT Analysis Methodology Section. There is inconsistency in language, and there are items in Table 1 that are not addressed in the Thresholds of Significance Section or the Project VMT Analysis Methodology Section.	There is not an inconsistency. • The screening criteria in table 1 are not thresholds of significance, they are criteria that would identify projects considered to have a less than significant impact to transportation without a detailed analysis. • Projects that don't screen out would have to do a detailed analysis to determine if the transportation impact is significant (above the threshold) or not.
7.3	The third bullet states that a retail project will only cause significant VMT impact if it "increases the average VMT for the County, HBX and HBW." This statement says the VMT threshold for retail projects is 0% below the baseline. (1) Please justify why a retail project is allowed to generate more VMT than other projects. (2) Clarify exactly what "average VMT for the County, HBX and HBW" means. Provide the equation. Bring into alignment / consistency with the guidance in the Project VMT Analysis Methodology Section.	This is the recommended threshold for retail projects from the OPR (now LCI) Technical Advisory. However, the Technical Advisory recommends using total VMT and that data is not available with StreetLight. 1. The Advisory states: "Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project's transportation impacts. By adding retail opportunities into the urban fabric and thereby improving retail destination

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		proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.” 2. HBX means the average vehicle miles traveled by residents per day based off of home-based trips to “other” locations, not work. There is no equation, and this is clearly stated under the VMT Metrics Section. HBW means the average vehicle miles traveled by workers (or “employees”) per day based off of home-based directly to work trips, not including trips that stop in between. There is no equation, and this is clearly stated under the VMT Metrics Section. Detailed project VMT analyses should utilize the Trip Generation Guide from the Institute of Traffic Engineers to calculate a projects VMT. This will be updated in the Policy Guidelines document.
7.4	The fourth bullet treats redevelopment projects the same as retail. (1.) Please justify why a redevelopment project is allowed to generate more VMT than other projects. (2) Please clarify what a redevelopment project is and what it is not. Would this include abandoned land uses that are no longer active, such as the Samoa pulp mill?	1. The Technical Advisory states “Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds should apply.” 2. A redevelopment project would utilize an existing structure. Any project that would increase VMT from the previous uses would be required to conduct a detailed VMT analysis to determine significance under the established thresholds. It is important to consider the County does not have any redevelopment areas. This is consistent with the concept of baseline whereby the existing conditions are what the environmental analysis is evaluating against. An increase in impact would be a potentially significant environmental impact. If existing development were to be required to reduce VMT, the

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		unintended consequence may be that re-investment in existing facilities would not be as likely.
8.1	Map-based screening: 1. Clarify the language on this to align with OPR and Table 1 by stating that this only applies to residential and office projects. 2. It is challenging to see how projects in the very rural low-VMT census block groups (i.e. the census block including Dinsmore, the large census block surrounding Blue Lake, or that including Petrolia) would achieve the intent of reducing VMT. Please further justify screening projects in these census blocks.	1. Table 1 in the VMT Guidelines does match the language of the OPR Guidance. The reference to the work and resident maps is for clarification. 2. We agree and recommend removing these block groups.
8.2	Small Projects: The County VMT Report by Fehr & Peers offers, on page 29, shows conversions of the 110 trip threshold to VMT per day and size of residential project. However, these conversions use 2012 CHTS data. Does the County intend to use these conversions to apply the screening for small projects? If so, please state this explicitly, and justify the use of 2012 CHTS data vs StreetLight data (which includes trip length information) for establishing these thresholds.	The screening criteria for small projects is simple, it is a project that generates 110 trips or less. It does not include a trip length modifier, and we do not propose adding that in. We plan to use trip generation rates from the Institute of Traffic Engineers, and this will be included in the Policy Guidelines. CEQA exemptions will be treated separately. If a project qualifies for CEQA exemption, it is exempt from further environmental review and VMT will not be assessed.
8.3	The policy states that a project can be screened out if it can be "... demonstrated to primarily attract trips that would have otherwise been traveled at a longer distance." 1. This language is very open ended. What does a developer need to do to demonstrate this? The concept is understandable on the surface but should not be presumed to result in 15% or 25% lower VMT without detailed analysis. For example, Schukei and Rowangould, 20243 observe that "... local access [defined as jobs and	This language does apply to local-serving retail as identified in Table 1 of the Policy Guidelines. The Technical Advisory states "By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer

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	households in the same census block group] matters less in terms of travel behavior in rural contexts.” 2. I assume this also applies to “Local-Serving” as used in Table 1.	trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.”
8.4	Table 1 1. “Residential and Office Projects” should be “Residential or Office Projects” 2. “Near transit station” should be “Near Major Transit Stop” 1. Does “minimum parking spaces required” include allowances in code for further reducing parking minimums? 3. For “Local-Serving Retail”, please clarify that “local-serving” means less than 50,000 per the Technical Advisory 1. Please assess the estimated percentage of all existing retail that is below 50,000 square feet. In other words, does this screen out a majority of likely future retail projects?	1. Language taken from OPR Technical Advisory. 2. Agreed. Will make that change. Minimum parking spaces is minimum required in the Zoning Ordinance. This presumes some reduction has been granted to comply with this provision. 3. The 50,000 square feet is stated in the definition of a local-serving entity. 1. It is not clear how this is relevant to using the OPR guidance. Use of this Screening Criteria does not mean that most of the future retail will be screened out. The last two local serving retail developments are the Grocery Outlet (22,000 Square Feet) and Dollar General (10,000 square feet) stores in McKinleyville. Both of these stores are principally permitted and thus go straight to Building Permit and are exempt from CEQA. This is true of most commercial zones in Humboldt County.
8.5	Please add to Figure 3 the exceptions listed after the Figure, such as discretionary projects, qualifiers on projects within ½ mile of a major transit stop, etc. For example, the additional detail shown in the figure in Section 5.4 of the County VMT Report by Fehr & Peers.	The requested information could be added to the flow chart, but the objective was to keep this criteria simple and clear. The information in the F&P flow chart is beyond what is being contemplated for screening purposes. Any exemptions are included in the discussion of the screening criteria.
9.1	Project VMT Analysis Methodology Section See comment 6.2 above.	Addressed above.

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9.2	Is it possible to provide improved guidance to developers on best practices for estimating home based VMT for determining compliance with the proposed thresholds? This will help ensure consistency in the approach used by project developers. For example, should County TDM be used?	This is explained in the guidance. The screening criteria and the project specific analysis should use the same criteria. The Humboldt County VMT study is available on the County GIS and can be used by Traffic Engineers to conduct future VMT Analysis. The Traffic Demand Model has a cost associated with its use. Requiring consultants (and the County) to buy a license to use this creates significant additional cost.
10.1	Mitigation – VMT Reduction Strategies Section Ensure alignment of the recommended strategies with the draft Regional Climate Action Plan (RCAP) 1. Or perhaps simply use the measures in the RCAP if there is significant discrepancy between the RCAP measures and those in the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (Handbook). 2. If there is alignment between the RCAP and the measures selected from the Handbook, then state explicitly and justify. 3. If measures from the Handbook are to be used, reference their ID in the Handbook. For example, “Increase Residential Density” is measure T-1 in the Handbook.	The VMT Guidelines are intended to ensure compliance with the RCAP. There is no Discrepancy with the RCAP. It is important to understand that the VMT screening is a very small component of the RCAP objectives. The VMT Guidelines primary purpose is to provide guidance on how to address potential CEQA impacts related to transportation. Why would it be necessary to justify alignment with the RCAP, as this is a stand-alone policy? We are not using measures from the handbook other than what is specifically written in the Guidelines.
10.2	Table 2 in the County VMT Report should not be used. For example the value of 31% for transit-oriented development is completely inappropriate for use anywhere in Humboldt County.	The 31% value of VMT reduction for transit-oriented development comes from Table 2 of the VMT Study by Fehr & Peers and was extrapolated from the California Air Pollution Control Officers Association (CAPCOA) Handbook. This value was determined to be appropriate by CAPCOA.
10.3	I recommend referring to the Handbook instead of using Table 4 of the County VMT Report. Table 4 is a useful summary but should not be a substitute for using the Handbook.	Table 4 is this is a reference to Fehr & Peers section 5.4, which was developed based on the CAPCOA Handbook. However, this table is more complicated than is needed. The County VMT Guidelines do not precisely follow Fehr &Peers because it is not efficient.

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10.4	Much of the language in this section is pulled directly from the County VMT Report by Fehr & Peers. However, this language is a high-level summary of the detailed guidance provided in the Handbook. If the Handbook measures are to be used (instead of those from the RCAP) do not copy the language from the County VMT Report into the Policy Guidelines. I recommend simply referring to the Handbook and requiring the use of the Handbook when applying the Project-Scale and Community-Scale measures. I recommend this for the following reasons: 1. The County VMT Report cites the 2021 version of the Handbook. The latest version of the Handbook is dated October 2024. It will presumably continue to be updated. 2. There is significantly more detail and clarity provided in the Handbook that is important to understand when applying the recommended measures. 3. There are numerous non-quantified measures listed in the Handbook that can help to significantly improve the likelihood of success of the recommended measures. It would be useful to allow these to be added to the mitigation strategies as well.	It is more difficult to refer to different documents than to have the relevant information in one place. 1. The Policy Guidelines have been updated to say “current” Handbook. 2. Comment Noted 3. Comment Noted
10.5	If the Handbook measures are to be used (instead of those from the RCAP) consider adding language that requires consideration of including applicable non-quantified measures identified in the Handbook.	Not sure how this helps. If the reference is made to the Handbook all applicable information is included.
10.6	“Use cleaner-fuel vehicles” strategy: 1. This strategy does not reduce VMT. While it will reduce the GHG’s associated with VMT, it will not reduce the health and safety impacts associated with VMT and single occupancy vehicles. This strategy requires significant further justification if it is to be used.	Specific mitigation measures are no longer identified in the VMT Policy Guidelines, but it references Transportation Demand Management strategies in the CAPCOA Handbook.

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1	The proposal to use average per capita VMT in unincorporated Humboldt County as the baseline for calculation is not reasonable. 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.	1. The StreetLight data does not truncate trip information based on boundaries and full trip information is included in the averages. StreetLight categorizes the trip data depending on where the home-base location is, and employment-based location is. For example, residents who live in unincorporated Humboldt are included in the HBX (average VMT per residents) for unincorporated Humboldt, and employees who work in unincorporated Humboldt are included in the HBW (average VMT per worker/employee) for unincorporated Humboldt. 2. Trips are not truncated in StreetLight data based on boundaries. This is explained in the SB743 Overview Readme from StreetLight. 3. The County could decide to have urban and rural thresholds. This would require further staff time and analysis to develop substantial evidence to base these thresholds off. Travel trends show that residents who reside in the rural areas tend to make less trips, giving them a lower average daily VMT than residents that reside in urban areas.
2	The low VMT area maps claim that some remote, car-dependent areas are "low VMT". 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.	Agreed. Staff propose to remove the Rural Southern Humboldt Region, Rural Eastern Humboldt Region, and Rural Northern Humboldt Region from the low-VMT maps for HBX.
3	Parking management must be included as a potential mitigation measure for VMT impacts in appropriate projects.	There are several justifications for not including parking management into the mitigation measures considered appropriate for Humboldt County. Please see the following: 1. Financial burden to those with limited income, making it potentially difficult to access services. 2. Deterring customers from visiting local businesses and negatively affecting local businesses.

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		3. Less available parking and higher parking fees can lead to increased traffic congestion as people seek for available parking or alternative parking options. In a community with limited alternative forms of transportation, this simply precludes people from going to certain places. While there may be some concerns with enforcing parking management in the rural context of Humboldt County, it may still act as an appropriate project-scale mitigation strategy for certain projects. Specific mitigation measures are no longer identified in the VMT Policy Guidelines, but it references Transportation Demand Management strategies in the CAPCOA Handbook.
4	While lower-emission vehicles are crucial for addressing issues like air quality and greenhouse gas emissions, they have no effect on VMT. Cleaner fuels are not a potential mitigation measure for VMT impacts.	Staff Agrees. Specific mitigation measures are no longer identified in the VMT Policy Guidelines, but it references Transportation Demand Management strategies in the CAPCOA Handbook.

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1	As shown in our comments on the Regional Climate Action Plan, the County is actually carbon negative and is already contributing a net reduction in carbon.	It should be understood that setting VMT thresholds for the County is more than about implementing the Climate Action Plan or State goals for reducing GHG emissions. The fact is CEQA has been changed to evaluate transportation impacts based on VMT and not on Level of Service standards. The VMT guidelines will be used in the CEQA analysis of future projects. If guidelines are not established, projects would be evaluated without having consistent criteria.
2.1	Threshold: The proposed VMT Policy establishes a 15% reduction in VMT, but this reduction is based on the State meeting its goals, for which the County should not be held liable for. However, it appears that the boat has already sailed, and the County is committed to a 15% reduction, even though the County has the ability to select a lesser percent if it is supported by substantial evidence. We strongly suggest the County limit the threshold to a 15% reduction and provide broader flexibility to the project screening criteria.	The comment seems to conflate GHG reduction Goals with VMT reductions. As noted above, even if there were no GHG reduction goals there would still be CEQA transportation thresholds to be addressed. The proposed guidelines do follow the OPR Technical Advisory of 15% less than existing VMT. Currently, there is no evidence to support adopting a threshold below the OPR recommendation. From a legal standpoint, following the state recommendations is highly defensible, but straying from that without substantial evidence would leave the county vulnerable to challenge.
2.2	Threshold: The concept of establishing a threshold and standard methodology to address VMT under CEQA makes sense for the County, especially since so much effort has been put into it. However, this needs to be carefully thought out so that we are not painting our County in a corner and making development and economic stability more difficult.	A great deal of thought and effort has been put into these guidelines.
3.1	Baseline: The argument for using StreetLight to estimate VMT rather than the County's Travel Demand Model (TDM) seems flawed. If there has been zero growth between 2010 and 2022 (Policy Guidelines page 3) the TDM from 2013 should	The County does not currently have access to Caltrans' HCTDM, and is not able to compare forecasted data from the model to the 2022 StreetLight data at this time. Obtaining access would require a \$10,00 a year registration fee.

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	be fairly reflective of current conditions. At a minimum, the results based on the StreetLight data should be compared to results from the TDM to see how they compare.	
3.2	Baseline: There is no discussion on how StreetLight data applies to rural areas. The data is very likely more representative of urban areas and does not reflect the majority of the County. This is not discussed in the VMT Study and it should be addressed.	On page 5 of the Staff Report for April 17 discusses that StreetLight obtains location-based data from cell phones and GPS in cars, and information from cell phones requires devices to have cell service at the start and end of the trip in order to capture the trip data. While this may lower the accuracy of StreetLight data in the rural areas of Humboldt County, it is likely that the HCTDM is similarly inaccurate in rural areas of the County, as it is based on California Household Surveys from the year. There is no perfect data set for Humboldt County.
3.3	Baseline: VMT data is separated by US Census Block Groups, which may not be appropriate. Further review and adjustment should be considered. Larger regions of similar characteristics may be more appropriate. After a quick review of the data on the Humboldt County GIS we found multiple areas that are not very logical. For example, the intersection of Murray Road and Central Avenue. A project located just north of Murray Road would be subject to higher than County Average while a project just south of Murray Road is in an area mapped as low VMT and would be screened out. This doesn't make sense. There are multiple areas with similar inconsistencies. This is likely due to the fact that the Block Group boundaries are not boundaries associated with travel behavior. Logical boundaries could be better defined based on neighborhoods/communities with similar travel/population characteristics.	It is true that US Census Block Group boundaries are not associated to travel patterns, and this may be why the mapped Low-VMT may not be intuitive. However, the data is valid for these block groups when you consider travel patterns for commutes to work or other locations. The baseline data available for StreetLight comes standard in the form of block groups. TAZ's may be more appropriate boundaries to use for presenting the data, which are distinct geographic units created for transportation analysis purpose. TAZ's are either available in the HCTDM, or the County could decide to purchase alternative StreetLight data and reanalyze for TAZ's. This would require substantial resources to redo the work which has been done.

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4.1	Thresholds of Significance: Multiple project types are left out of the threshold discussion. How will visitor serving projects be addressed? Hotels, restaurants, tourism, ecotourism, etc. Will projects that encourage tourism/destination-based development to our beautiful rural areas need full VMT analysis? Specific examples include redwood canopy tours, glamping, farm-to-table restaurants and experiences, special events, etc. How will industrial and commercial projects be evaluated?	The VMT Threshold Policy does not set thresholds for tourism-based projects. There is currently no guidance from LCI for thresholds on hotels, tourism, ecotourism, etc. With the current draft of the Guidelines, projects that induce travel and cannot be screened out would need to conduct a detailed VMT analysis. However, these types of projects could be applied to the thresholds and screening for Employment projects, or the Planning Commission can consider developing thresholds for tourism-related projects. Industrial and commercial projects are evaluated as employment projects and will be evaluated against employment project thresholds.
4.2	Thresholds of Significance: The 15% reduction threshold may not be appropriate for rural areas. The total VMT should be evaluated. For example, the Block Group area around Petrolia has a VMT per resident of 30.20 miles (above the County & above 15%) and the VMT per employee is 9.94 miles (below the County & below 15%), however, the number or residents should be considered as the overall contribution may be insignificant due to population levels when compared to the County total or denser areas that have a larger contribution and higher rate of vehicle/pedestrian interaction. This data says if you live in the Petrolia Block Group you drive too far but if you work there, you do not; This just doesn’t make sense. The Policy will encourage more office projects, but would limit new housing, which is in deficit in our rural areas and is counterintuitive.	The Low-VMT area maps can seem perplexing, but they are logical when it is realized that people who live in rural areas tend to work on their property, making work or “employment” trips very short and “residential” trips for services much longer. The low VMT at the simplest level for rural live/work environments would be fine, but it could encourage people to attempt to put other uses in those areas that are not currently permitted by land use or zoning. For this reason, staff is recommending amending the maps. Outlying block groups have been removed from any potential low-VMT screening area maps.

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5.1	Project Screening: There are no major transit stops in the unincorporated areas of Humboldt. Identifying transit stops that should apply or be accounted for, in the unincorporated areas, should be a priority. Urban based (e.g. major metropolitan/traffic areas) methodology for identifying major transit stops should be avoided and focus on rural characteristics should be encouraged.	Major transit stops identified in the Guidelines were based on major transit stops identified in the RTP. While there are currently no major transit stops located in unincorporated Humboldt, there are provisions to add major transit stops if they qualify in the future. The transit facility proposed in the McKinlyville Town Center Master Plan could be one of these. The County could adopt other highly used bus stops in rural areas as major transit stops if this is found to be appropriate for project screening.
5.2	Project Screening: Highway 101 should be considered a rural, high-quality transit corridor from at least Trinidad to Rio Dell and potentially beyond. Land use projects within a certain distance of this corridor should be presumed to have less than significant impact on VMT to allow more flexibility for project screening. This should also include unincorporated communities like Garberville, Petrolia, Shelter Cove, Redway, Alder Point, Willow Creek, etc. so that they are not disadvantaged.	Currently, the State has guidance for high-quality transit corridors, which can be found at https://sitecheck.opr.ca.gov/. The recommended high-quality transit corridors include sections of Highway 101 in Eureka, Arcata, Tomkins Hill Road in Fields Landing, and Guintoli Lane, and could be included in the options for project screening. However, these corridors are all within the areas identified as Low-VMT Screening Areas in the updated Low-VMT Screening Maps (Attachment 11).
5.3	Project Screening: Small project screening, will this be handled similarly to how small projects are currently screened? For all projects consistent with zoning and land use?	As stated in Table 1 of page 5 of the Guidelines, this would require consistency with the zoning and land use code.
5.4	Project Screening: The map-based screening, Low-VMT areas do not make sense. For example, rural areas outside of Garberville and Blue Lake would not require VMT analysis for residential projects? But Fortuna and parts of McKinleyville would be required? The Low-VMT areas for office projects appear to be in a lot of areas where the land use is likely not compatible with office projects, which is counterintuitive.	Staff Agrees. Outlying block groups have been removed from any potential low-VMT screening area maps.

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5.5	Project Screening: Near transit station. What if the County changes the parking requirements so that the minimum is zero parking spaces? There should be flexibility for businesses to allow some parking, especially in areas with limited parking.	This is a policy decision. A transit station is not a bus stop, and locating development near a transit station reduces the need for parking. Parking Management does not need to mean parking prohibition. A reduction in the area devoted to parking increases the area available for buildings and residences having the co-benefit of lower land costs.
5.6	Project Screening: Affordable housing. This should be for all housing projects in infill areas to encourage new housing, not just affordable housing. The Policy encourages subsidized housing only, not allowing for locally built, market rate housing, which is greatly needed and helps build wealth for young residents and provides jobs for local builders. It is our experience that subsidized housing benefits very few local contractors and workers, often the work goes to firms located outside of Humboldt County.	The Planning Commission may consider broadening the screening criteria for housing within infill areas (identified as Urban Areas in the Guidelines) to all housing projects but not all infill areas have low VMT.
5.7	Project Screening: Local Serving Retail & Redevelopment. Agree with screening criteria.	Comment noted.
6	Analysis of Land Use Projects: The Policy states, <i>Land Use projects that are inconsistent with the General Plan and Zoning Code are automatically considered inconsistent with VMT Policy and shall conduct a detailed VMT analysis.</i> • Does this include residential projects in infill areas? • The Cutten Development test case in Section 6 of the VMT Study required an EIR and General Plan Amendment, but was screened out of further VMT analysis. This test case is inconsistent with the statement above.	This statement came from the VMT screening maps that show large areas of the county which have low VMT. From a policy perspective it would not be good to screen projects in low VMT areas that create different commute patterns with high VMT than the types of uses causing the area to have low VMT. This is possible from General Plan Amendments and Rezones. The Guidelines were written to discourage development in locations that would increase VMT's. The alternative VMT screening maps would address that by removing the problem areas. It is a policy issue whether the County wants to screen out legislative acts or limit the screening to development

#	Public Comment – Annje Dodd & Praj White's Comments	Response
	Projects within 1-mile of a major transit stop • Does this apply to infill projects? • Replacing affordable housing units with lesser non-affordable housing wouldn't this result in lesser VMT?	projects. In low VMT areas it may be good to allow some consideration of a GPA and Rezone without a full analysis. The guidelines screen projects within half a mile of a major transit stop. Projects that can be screened out are self-explanatory. Some infill locations do not have low existing VMT and would not screen out. Studies show that affordable housing units generate less VMT than market-rate housing.
7	VMT Analysis Methodology: The methodology relies on an apples-to-apples comparison. The County developed baselines using 2022 StreetLight data and the Policy suggests that analyses should use this data. How will this data be provided to applicants? This appears to be proprietary and limited to one traffic consultant that all applicants would be required to use? Also, this traffic consultant is the consultant the County hired to do the VMT Study & is the same consultant that recommended NOT using the County's TDM model. This doesn't seem right.	VMT data for the block groups is already available on the Humboldt County Web GIS.

#	Referral Comment – Humboldt County Association of Governments	Response
1	HCAOG recommended the use of Major Transit Stops that were identified in the RTP.	This has been included in the screening criteria.
2	Questions on the VMT Study Report about the potential of using the RTP to set regional VMT thresholds and if new development project's require consistency with the RTP.	The County has the option to use the VMT reduction targets of the RTP to set thresholds of significance, as well as the option to require consistency with the RTP in screening criteria. However, the RTP does not provide an assessment of what levels of VMT are considered acceptable and does not provide substantial evidence for establishing thresholds.

#	Referral Comment – CalTrans	Response
1	Expressed concerns with the use of StreetLight data for comparisons with actual traffic counts, engineering purposes, or bicycle and pedestrian analysis.	StreetLight data will not be used for any of these purposes and is only recommended to establish baseline VMT.
2	The Staff Report should reconcile how VMT thresholds contribute to State goals for GHG reduction and discuss how they help meet these goals.	This is identified in the report with the objectives identified from the General Plan that facilitate VMT reduction and connects the proposed VMT thresholds to the State's GHG emissions reduction goals.
3	Due to a persistent struggle to obtain high-quality data in rural regions, Caltrans supports the use of General Plan and zoning ordinances to facilitate low-VMT development patterns and transportation systems.	No response necessary.
4	The limited availability of high-quality data may limit the region's effectiveness in a dependence upon site-specific VMT analyses for regulating land use generated VMT, particularly on an ad hoc basis, and shifting the burden of cost for assuring VMT reduction strategy compliance to individual housing developments may impact the attainment of regional housing goals.	Projects with 100 percent affordable housing units in Urban Areas has been included in screening criteria for projects considered to be less than significant.

#	Referral Comment – CalTrans	Response
5	New residential development that adheres to General Plan goals, policies, standards, and implementation measures may facilitate VMT reduction at little or no cost to individual residential developments, particularly for infill sites. This assumes that no mitigation fee program is implemented by the County. Caltrans further states that Impact Fee Programs tend to be effective where development occurs at a rapid pace and where supplemental sources of funding make up a significant share of the budget to implement the Capital Improvement Plan (CIP). Mitigation fee programs may be obligated to expend the fees collected within a relatively short timeframe or the mitigation fees may need to be returned.	The proposed threshold policy does not include the implementation of a VMT Impact Fee Program at this time. However, the concept and the steps to implement are included in the report for future consideration of program-based mitigation strategies and is an implementation measure of the General Plan.
6	Based on lessons learned in other parts of California, Transit-Oriented Development (TOD) may be less likely to achieve the benefits cited in the Report due to both the higher-cost of TODs in terms of housing affordability and the existing limitations of regional transit service. This observation is not intended to discourage the use of TODs.	Specific mitigation measures are no longer identified in the VMT Policy Guidelines, but it references Transportation Demand Management strategies in the CAPCOA Handbook.
7	Caltrans states that parking management strategies will work best to reduce VMT if coupled with improvements in transit service or other VMT-reducing travel modes, such as car-share and micro-mobility programs.	Same response as above.
8	Using the large urban regions of California as a test-case for establishing mitigation banking or exchanges in Humboldt County may have financial limitations for amassing the capital needed to build low-VMT infrastructure that make these programs infeasible.	Additional study on this topic would be needed prior to considering the use of VMT banks or exchanges. VMT banks are not included in the proposed VMT threshold policy, but the concept is included in the VMT Study.

#	Referral Comment – CalTrans	Response
9	We request to receive access to the online VMT tool for Humboldt County to ensure that our evaluations and determinations of VMT impacts are consistent with those of the region. We offer to partner with the County and region to ensure that the best available data and practices are employed to meet Statewide VMT goals and targets.	The online tool data is already available on the Humboldt County Web GIS.