

ATTACHMENT A – County of San Diego  
History of Vehicle Miles Traveled  
Integration

**HISTORY OF VEHICLE MILES TRAVELED IN COUNTY OF SAN DIEGO**

In 2013, the State of California passed Senate Bill 743 (SB 743), which changed how jurisdictions, including the County of San Diego (County), analyze transportation impacts from privately and publicly initiated projects under the California Environmental Quality Act (CEQA). SB 743 identified Vehicle Miles Traveled (VMT) as the standard to evaluate a project's transportation related environmental impacts. VMT replaces motorist delay and associated level of service (LOS) as the metric for traffic impact analysis under CEQA. VMT measures both the volume of daily vehicle trips generated and the average distance people drive to and from destinations by specific types of land uses. The intent behind SB 743 was to balance the needs of congestion management (traffic) with statewide goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation such as walking and biking.

On June 24, 2020 (6), the Board of Supervisors (Board) adopted a Transportation Study Guide (TSG), a technical guide for analyzing transportation impacts using VMT. The TSG describes the process and procedures for project applicants to use when preparing transportation analyses for projects in the unincorporated area beginning July 1, 2020. In September 2020, Cleveland National Forest Foundation (CNFF), Coastal Environmental Rights Foundation (CERF), and the Sierra Club filed suit against the County, alleging adoption of the TSG violated CEQA and SB 743 by establishing a threshold based on the unincorporated VMT average instead of the region, adopting the small project exemption for projects that generate less than 110 average daily trips, and not requiring environmental review of the guidelines.

On May 19, 2021 (1), the Board received information on how VMT implementation was progressing nearly a year after the adoption of the County's TSG and options for potential updates to how the County analyzes transportation impacts of proposed projects under CEQA. The Board directed staff to explore 13 items related to VMT for projects in the unincorporated areas.

On June 29, 2021, the Governor's Office of Planning and Research (OPR) clarified that the unincorporated area of counties should use a VMT threshold based on the regional average VMT (rather than an unincorporated area average), which includes the entire San Diego region. This changes the threshold for what areas are considered VMT efficient and reduces those areas within the unincorporated area. VMT efficient areas are locations that meet the threshold, or generate low enough vehicle miles, to allow projects to move forward without VMT analysis, streamlining projects in these VMT efficient areas. Projects located outside VMT efficient areas must perform VMT analysis and are required to mitigate for, or offset any VMT-related impacts. An offset is a reduction in VMT resulting from the construction of a VMT reducing project like a sidewalk or bike lane that decreases a project's overall VMT. Considering the clarification from OPR that unincorporated areas should use a VMT threshold based on a regional average, on September 15, 2021 (1), the Board adopted a resolution to rescind the current TSG, which relied on an unincorporated area average for VMT. Based on the Board's action, the petitioners agreed to dismiss their lawsuit.

On February 9, 2022 (7), the Board directed staff to update the TSG (Phase 1) to develop options for a Sustainable Land Use Framework for the unincorporated area, including the identification of sustainable development principles that could inform land use decisions and options for a parcel-by-parcel analysis, develop a regional VMT mitigation program working with other local jurisdictions, and prepare a Programmatic Environmental Impact Report (EIR) that looks at screening out projects from VMT analysis that are located within Transit Opportunity Areas (Phase 2). Subsequently, the parcel-by-parcel analysis was renamed Development Feasibility Analysis to reflect a more comprehensive approach needed to identifying development potential. As part of Phase 2, the Board also directed staff to develop a Transportation Demand Management (TDM) plan for the unincorporated area that includes measures to reduce vehicle trips from new development such as telecommuting, walking, carshare, shuttles, and other options that reduce single occupant vehicle trips, and examine combining a community land trust with a VMT mitigation bank to create a path for Environmental Justice (EJ) and VMT opportunities within those communities. These actions all relate to future development patterns in the unincorporated area by evaluating where and how development should occur to meet housing needs and/or providing tools to facilitate sustainable, equitable placemaking throughout the unincorporated area.

On September 28, 2022 (6), the Board adopted a revised TSG that aligns with State guidance and establishes a threshold based on the regional average VMT (rather than an unincorporated area average), which includes the entire San Diego region. The TSG also identifies Infill Areas where no VMT analysis or VMT mitigation would be required for future development projects. In accordance with State guidance, the TSG also screens out small projects, locally serving uses and public facilities, and 100 percent affordable housing projects from having to do additional VMT analysis or mitigation. The Board also directed staff to explore options to help create new VMT efficient areas and to expand study plans for new and expanded wineries if they did not increase VMT.

In November 2022, the CNFF and the CERF filed a lawsuit against the County alleging the 2022 TSG violated CEQA because the thresholds regarding infill area and small projects were adopted without substantial evidence. In December 2023, the trial court found the County's infill area and small project exemptions were supported by substantial evidence and upheld the 2022 TSG. However, this ruling was appealed by CNFF and CERF, and in April 2025, the appellate court found that the County's infill area and small project thresholds were not supported by substantial evidence. The County petitioned the California Supreme Court to review the decision and was supported by amici briefs from the County Counsels' Association and the League of California Cities. Ultimately, however, the Court denied review of the case, rendering the appellate court's decision final. In October 2025, the trial court issued a writ of mandate ordering the County to revise its TSG to remove the infill area and small project thresholds. On January 14, 2026 (6), the Board adopted a resolution to revise the TSG.