

Appendix to Stakeholder Meeting Presentation (8/10/23)

Updated 8/31/23

Fehr & Peers

	Current: Project-by-Project	VMT Exchange	VMT Bank	VMT Mitigation Plan*
<p>Analogies offer clarity – how do you keep your fridge stocked?</p> <p>(From the perspective of the buyer)</p>	<p>When you need to restock, you search for the local farms and shops that offer the products you want, and make separate trips to get eggs, vegetables, fruits, and bread. Sometimes the prices fluctuate, sometimes things are unavailable, you have to negotiate with a lot of people, and it is kind of a big chore.</p>	<p>When you need to restock, you visit the grocery store, which generally has all the items you need in one place. Sometimes the prices fluctuate, sometimes things are unavailable or all the sale items are sold out, but this generally works and is a lot easier than visiting all the different providers one at a time.</p>	<p>You find a flexible Community Supported Agriculture (CSA) service that allows you to purchase, for a fixed and predictable price, a produce box that will give you healthy foods that will meet your nutritional needs, but you don't get to choose. Some weeks you might not get bread. Other weeks you might get a lot of kale. You can purchase only the boxes you need, week to week.</p>	<p>You find a traditional CSA service that offers you a great blend of fruit, veg, egg, and bread to meet your needs, but you must forecast everything up front for the entire season, taking stock of anticipated changes to your family size, dietary needs, and seasonality in produce. You don't have to pay for it all up front, but once you've signed up, you can't change your mind mid-way through the season.</p>

*Note – per stakeholder feedback, we have renamed this option “VMT Mitigation Plan” instead of “VMT Reduction Plan” to clarify that the goal is VMT mitigation in compliance with Caltrans policy, and not necessarily a net reduction in VMT. Furthermore, this Plan would only include the projects requiring mitigation and the mitigation measures needed to mitigate, not necessarily all VMT-related activities within Metro.

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Frameworks & Key Questions	Current: Project-by-Project	VMT Exchange	VMT Bank	VMT Mitigation Plan*
Highway Project Team Effort (admin & analytical)	High	Medium – pre-analyzed menu	Low – cost / VMT credit	Low – tiering
Metro Effort (admin & analytical & tracking/accounting)	Low	Medium – analysis & recordkeeping	High – analysis, recordkeeping, program refresh	Medium – “extra” CEQA up front, but reduced project analysis burden
Analysis Consistency	Low	High	High	High
Legal Risk	Medium – analysis consistency	Low	Medium – new framework carries risk	High – “extra” CEQA
Public Influence & Input	Project level only	Project level & Exchange level	Project level & Bank level	Project level & VMP level
Flexibility to add new mitigations	High	High	Medium – cyclical refresh for credit valuation	Low – Update EIR or add through an Addendum with evidence of similar VMT impact mitigation potential
Flexibility to modify SHS project through project development	High	High	High	Low – Update EIR or modify through an Addendum with evidence that the difference is less than the cleared impact
“First in” problem?	No	Yes	No	No
Efficiency in matching impacts & mitigations	No	No	Yes	Yes
Cost certainty to project team	Low	Low	Medium – certainty within refresh cycle	High – captured at Agency level when projects & mitigations are implemented
Where is the cost of mitigation accounted for?	Project level	Project level	Project level	Plan level; no project-level cost connection to mitigations

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Captures synergies of multiple mitigation actions?	No	No	No	Yes
Ease of incorporating non-Metro mitigation implementers	Doable, would require project team coordination	Doable, would require MOU	Doable, would require commitment that mitigation action isn't otherwise funded within refresh cycle	Difficult but possible with strong MOU procedures and delegated CEQA authority
Ease of "selling" to outside projects seeking mitigation	N/A	Doable, would require MOU	Doable, would require process of accepting external funds	N/A
What kinds of mitigations are easiest to include?	Capital, programmatic, operations	Capital, programmatic, operations	Capital, programmatic, operations; may improve ease of use to separate into "accounts" to address duration issues	Could include capital, which already often undergo a CEQA process; could also include programmatic or operational

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