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Governor's Office of Planning & Research

**September 27 2021**

**STATE CLEARINGHOUSE**

September 23, 2021

City of Lancaster  
Attention: Jocelyn Swain, Senior Planner  
44933 Fern Avenue  
Lancaster, California 93534

RE: City of Lancaster Vehicle Miles Traveled  
Mitigation Program – Notice of Preparation  
(NOP)  
SCH# 2021090175  
GTS# 07-LA-2021-03703  
Vic. LA-14

Dear Jocelyn Swain,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The City is proposing to adopt an ordinance that establishes a Vehicle Miles Traveled (VMT) Mitigation Program with the intent to reduce Citywide VMT. The VMT Mitigation Program would identify relevant transportation demand management (TDM) strategies and VMT-reducing projects within the City to be funded by future developments that trigger potentially significant VMT impacts under the California Environmental Quality Act (CEQA). Potential VMT-reducing measures may include providing pedestrian/bicycle network improvements, traffic calming infrastructure, improved street connectivity, and City-run programs to incentivize use of alternative travel modes.

After reviewing the NOP, Caltrans has the following comments:

The primary intent of the VMT Mitigation Program, as well as the potential VMT-reducing measures and strategies, are in direct alignment with State-level sustainable transportation policy goals which seek to reduce the number of trips made by driving, reduce Greenhouse Gas (GHG) emissions, and encourage alternative modes of travel. Caltrans' Strategic Management Plan has set targets of tripling trips made by bicycle and doubling trips made by walking and public transit, as well as achieving a reduction in statewide, per capita, vehicle miles traveled (VMT). Similar goals are embedded in the California Transportation Plan 2040, Draft California Transportation Plan 2050, and Southern California Association of Governments (SCAG) Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Statewide legislation such as AB 32 and SB 375, as well as Executive Order S-3-05 and N-19-19, echo the need to pursue more sustainable development. Programs, like the one proposed, can help California meet these goals.

In addition to identifying substantive City-lead projects that make it safer for people to walk, bike, or take transit, the VMT Mitigation Program should establish clear and simple guidelines to avoid building car-centric infrastructure in the first place. Such as:

- Eliminating car parking requirements, as research looking at the relationship between land-use, parking, and transportation indicates that car parking prioritizes driving above all other travel modes and undermines a community's ability to choose public transit and active modes of transportation.
- Requiring wide sidewalks, street trees, curb extensions, shaded transit shelters, and pedestrian scale street furniture and lighting on all street facing edges and corners of new or significantly renovated land-use projects.

Caltrans looks forward to reviewing the forthcoming Draft Environmental Impact Report (DEIR), and our Transportation Planners are also available to discuss or provide any assistance that might be needed while developing this VMT Mitigation Program.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2021-03703.

Sincerely,



Miya Edmonson  
IGR/CEQA Branch Chief

cc: State Clearinghouse