

AGAINST Changing the VMT Policy

The proposal from Districts 1 and 3 is:

1. Directly in conflict with the County's General Plan
 2. Does not comply with the State VMT guidance
 3. Does not provide the public any chance to participate
 4. Will end any chance for market-rate housing
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1. Will not allow development that complies with the General Plan to proceed
 - The General Plan was collaboratively worked on for 12 years, included 100s of hearings, and was a landmark compromise between members of the public, industry, and environment
 - The General Plan itself extinguished millions of VMT in 2011—ahead of the 2013 State Law on VMT
 - This action will effectively end development that is consistent with it.
 - **Instead of preparing a 15183 checklist (that still requires environmental review and input), this will now require GP-consistent projects to prepare an Environmental Impact Report**
 2. Doesn't even align with the "guidance" prepared by the State to implement its own law:
 - The threshold of 110 trips per day—the equivalent of 11 single family homes—was itself recommended by the state as "de minimis"
 - The proposal to revisit that threshold goes against the State's actual recommendation
 - **Any project that proposes more than 11 homes (and not in the very narrow VMT-efficient zone) will have to prepare an EIR**
 - The proposal recommends changing the definition of region to align with the State.
 - The State guidance did not define "region" at all
 - It left it up to each jurisdiction to make that interpretation
 - There is no requirement to have the region defined as the MPO (SANDAG)
 - **The County provided substantial evidence in June 2020 to make the finding that the unincorporated County is the appropriate region for VMT purposes.**
 3. The proposal directs the CAO to revise the Guidelines with no outreach component
 - No involvement from the public that owns land that can no longer be effectively developed
 - No involvement from Community Planning Groups, industry stakeholders, or even the Planning Commission.
 - **Districts 1 and 3 have spoken extensively about the need for inclusion and stakeholder participation—now they are trying to pass this without any public involvement.**
 4. This will effectively end any chance for affordable housing in the unincorporated County
 - Most developers in the County rely on the General Plan to provide streamlined compliance with CEQA
 - Now a 12-home subdivision in areas such as Lakeside, Ramona, or Bonsall will have to prepare an EIR
 - **The County is still required to provide 6,800 affordable units: this proposal would only allow for 1,200 units to still process efficiently**