



LSA

PROPOSAL

TO DEVELOP THE REGIONAL
VEHICLE MILES TRAVELED
(VMT) MITIGATION
PROGRAM



Prepared for
FRESNO COUNCIL OF
GOVERNMENTS

W W W . L S A . N E T

MARCH 24, 2026



A. Transmittal Letter

March 24, 2026

Santosh Bhattarai, Project Manager
Fresno Council of Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721

**Subject: Proposal to Develop the Regional VMT Mitigation Program
for Fresno Council of Governments**

Dear Mr. Bhattarai:

LSA understands the Fresno Council of Governments (Fresno COG) is requesting proposals from qualified consultants to develop a regional Vehicle Miles Traveled (VMT) Mitigation Program Framework that is feasible to implement in the Fresno County region. LSA is pleased to submit this proposal in response to the Request for Proposals. LSA has 50 years of experience supporting transportation planning, policy, and implementation efforts across California. Our team brings extensive technical expertise and deep local understanding necessary to implement feasible and effective VMT mitigation strategies under Senate Bill (SB) 743.

LSA has a longstanding relationship with Fresno COG and extensive experience supporting transportation planning and modeling efforts throughout the San Joaquin Valley. Our team led the development of the Fresno COG SB 743 Regional Implementation Guidelines and the subsequent update, establishing a consistent methodology for evaluating transportation impacts across member jurisdictions. As part of this work, LSA applied the Fresno COG activity-based model (ABM) to develop jurisdiction-level screening maps and tools that streamline project-level VMT analysis. We also prepared VMT guidelines for the City of Fresno (City) and have completed a VMT Mitigation Fee Program supported by a nexus study under the Mitigation Fee Act.

LSA is one of the leading firms in the State that have been helping public and private entities throughout California in addressing and meeting the requirements of SB 743. Our team includes experts in VMT analysis, travel demand forecasting, and transportation planning & policy development who regularly support metropolitan planning organizations (MPOs), regional transportation planning agencies, the California Department of Transportation (Caltrans), and local jurisdictions statewide. Importantly, our leadership team includes professionals with direct experience working within Fresno COG and the broader region.

Ambarish Mukherjee, PE, AICP, Principal Transportation Planner, will serve as the Project Manager. Mr. Mukherjee is an expert in SB 743/VMT and has led LSA's efforts to assist multiple jurisdictions throughout California in developing VMT thresholds, guidelines, mitigation, and VMT screening and calculator tools. For this project, **Kristine Cai, Principal and Director of Mobility for Central and**

LSA Contact Person
Ambarish Mukherjee, AICP
Project Manager/Principal
Transportation Planner

1500 Iowa Avenue, Suite 200,
Riverside, CA 92507
Ambarish.Mukherjee@lsa.net
(951) 465-7395

LSA Authorized Signer
Amy Fischer
Chief Executive Officer

2565 Alluvial Avenue, Suite 112,
Clovis, CA 93611
Amy.Fischer@lsa.net
(559) 490-1210



Northern California, will serve as the Principal in Charge. Ms. Cai previously served as Deputy Director of Fresno COG, where she led the development and implementation of many innovative programs and policies that advanced sustainability, efficiency, equity, and safety goals over a 21-year tenure. Ms. Cai is a recognized expert in transportation strategy and planning, policy development, VMT strategy and mitigation, and travel demand forecasting. She brings deep experience working collaboratively with State, regional, and local agencies, elected officials, community-based organizations, and the public. She is currently assisting five MPOs in the San Joaquin Valley, including Fresno COG, in the development of their 2026 RTP/SCSs. Additionally, she is leading a multi-million-dollar climate resiliency project for eight MPOs in the San Joaquin Valley.

LSA appreciates the opportunity to continue supporting Fresno COG's leadership in implementing SB 743 and advancing regional transportation strategies that reduce VMT while supporting economic growth and mobility. We look forward to partnering with Fresno COG and its member agencies to develop a mitigation program framework that is technically sound, regionally appropriate, and feasible to implement.

This proposal is a firm offer for a 90-day period and is signed by LSA's Chief Executive Officer, who is authorized to bind the firm. If you have any questions regarding this submittal, please contact Ambarish Mukherjee, PE, AICP, at Ambarish.Mukherjee@LSA.net or (951) 465-7395.

Sincerely,

LSA Associates, Inc.



Amy Fischer

Chief Executive Officer





B. Table of Contents

A. Transmittal Letter.....	1
B. Table of Contents.....	4
C. Overview.....	5
D. Detailed Work Plan.....	11
E. Management Approach.....	26
Quality Control Procedures.....	27
LSA Team.....	28
Key Staff.....	30
Organizational Chart.....	32
F. Budget and Billing Format.....	33
G. Insurance Requirements.....	34
H. Disadvantaged Business Enterprise Certifications.....	34
I. Conflicts of Interest.....	34
J. Summary of Qualifications.....	35
LSA Firm Background.....	35
LSA Project Experience.....	39
K. Signing of Proposal/Authorization to Negotiate.....	45
Appendix A - Resumes.....	46



C. Overview

Regional Vehicle Miles Traveled (VMT) Mitigation Program Study Phase 1 of the Fresno Council of Government’s (Fresno COG) Regional VMT Mitigation Program Study, as indicated in the Request for Proposals (RFP), recommended a fee-based VMT mitigation bank as an appropriate program for implementation in the region. Although LSA understands the recommendation is the implementation of a fee-based VMT mitigation bank, LSA will conduct extensive literature review and discussions with an expert panel to identify advantages, disadvantages, and potential challenges with different mitigation programs as requested in the RFP.

Fresno County includes 16 individual jurisdictions, and the VMT mitigation program framework should serve the needs of all those jurisdictions. It has been established that VMT is a regional issue and so is VMT mitigation. As the Regional Transportation Planning Agency and the designated Metropolitan Planning Organization for the Fresno County, Fresno COG is recommended to be the administering agency for the mitigation program because the majority of jurisdictions may not have the capability to develop and implement a VMT mitigation program. A VMT mitigation program implemented by a regional agency will have flexibility to implement different project types and will support implementation of regional projects that can have significant impacts on VMT reductions.

Although a new entity could be created to manage the program, administering the VMT mitigation program within an existing regional structure would likely reduce administrative costs and improve coordination. As the regional body responsible for managing several transportation programs, Fresno COG already has experience administering funding programs. For example, Fresno COG administers the Fresno Regional Transportation Mitigation Fee (RTMF) program, a program similar to VMT mitigation program, but addresses level of service (LOS) deficiencies using Measure C funding. Establishing a similar administrative structure for the VMT mitigation program could provide greater administrative efficiency.

LSA recently assisted the City of Fresno (City) in development and implementation of a fee-based VMT Mitigation Bank. LSA’s experience in assisting the City with navigating and overcoming political, legal, administrative, and technical hurdles, especially in a local setting (jurisdiction in Fresno County) provides a unique advantage, as shown below, to assist in the implementation of a regionwide VMT mitigation program for Fresno County.

What Fresno VMT Reduction Program Implementation Work Taught Us

- Identify projects that have potential for other funding sources to keep total program costs low and VMT reduction fee reasonable
- Comparison of fees with other development related fees to show/see that VMT fees are not out of range
- Involvement of decision makers early in the process
- Consistent communication with internal project stakeholders and decision makers
- Evaluation of sample projects to illustrate the range of VMT reduction fees for land use projects
- Inclusion of administrative, monitoring, and reporting costs into VMT mitigation program
- Communication with the developers who will be paying the fees
- Inclusion of an EIR for the VMT mitigation program to account for uncertainties in the program (e.g., amount of VMT reductions due to the VMT mitigation projects)

C. Overview



- LSA can bring our experience of City of Fresno’s VMT Reduction Program and develop a ready-for-implementation approach for the Fresno COG program. The City of Fresno VMT reduction program received support/approval from the City Council, the administration, and the building industry association (BIA). The approach developed a feasible cost that was accepted and supported by the BIA and most of the development community. The VMT reduction program was also backed by the development of an Environmental Impact Report (EIR) to account for uncertainties involved with VMT mitigation reductions.
- LSA team has statewide experience with Senate Bill (SB) 743 VMT mitigation both for land use projects and transportation projects. For example, LSA recently assisted the Los Angeles Metropolitan Transportation Authority (LA Metro) in the development of mitigation measures for the regional Interstate (I) 405 Express Lanes Project.
- LSA has extensive experience working with the local development community, with local government staff and the transit agencies (e.g., Fresno Area Express [FAX], Clovis Transit, and the Fresno County Rural Transit Agency [FCRTA]), stakeholders, community groups, and various interest groups.
- LSA is currently assisting Fresno COG in preparation of their latest Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). This provides LSA with an in-depth understanding of local transportation needs for all modes of transportation, including potential projects that will help in reducing regional VMT.
- One of the important tools used in estimation of a project’s VMT and the amount of its impact is the Fresno COG activity-based model (ABM). LSA developed the Fresno COG SB 743 Regional Implementation Guidelines and recently updated them using Fresno COG’s ABM. In addition, LSA uses the ABM extensively for other land use development projects in Fresno County.
- Both for the California Environmental Quality Act (CEQA) and in real world applicability, it is desirable to have mitigations near/close to the actual project site/impact. To this extent, LSA developed an Excel-based tool, the Urban Design Calculator for City of Fresno, to assist the developers and the City in providing opportunities to mitigate the impact at the project site.
- Through development of the City of Fresno’s VMT reduction program, LSA conducted extensive spatial analysis addressing local equity issues (both social and geographical). A geographic information system (GIS)-based interactive map was created that allowed City staff to consider VMT-reducing projects within the City from an equity perspective to be included in the VMT mitigation bank. LSA can prepare a similar interactive map in GIS for the disadvantaged communities using CalEnviro Screen 4.0 (or the latest version).
- LSA has deep knowledge of the local planning landscape, including Kristine Cai’s 20 plus years of experience with Fresno COG and the communities in Fresno County; Ambarish Mukherjee’s direct experience in development of Fresno COG’s VMT guidelines, preparing the City of Fresno’s VMT Reduction Program; and Kyle Simpson’s extensive local CEQA experience, including preparation of the EIR for the City of Fresno’s VMT Reduction Program.
- As part of City of Fresno’s VMT reduction program development, LSA developed a framework to evaluate VMT mitigation projects at a large scale easily and efficiently. LSA can modify and rescale the tools to identify, evaluate, and prioritize VMT-reducing projects in the region.

As previously noted, LSA recommends implementation of a fee-based VMT mitigation bank as the appropriate VMT mitigation program for the region. Although some details

C. Overview

may vary depending on the type of program ultimately chosen, many of the core requirements will remain consistent across program types. The framework should address the following key elements:

- **Legal Considerations:** The legal considerations vary depending on the type of program adopted. However, all program types must establish and answer the following questions during program establishment, although the granularity and detail of those consideration may vary.

- » *Nexus and Proportionality:* The California Mitigation Fee Act codifies “essential nexus” and “rough proportionality” as requirements for local agencies seeking to impose a fee as a condition of land development. For VMT mitigation fees to be collected under the VMT Reduction Program, there must be an “essential nexus” between the VMT mitigation program and the reduction of VMT impacts associated with development projects. The VMT mitigation program must also demonstrate “rough proportionality” between the fees collected under the VMT mitigation program and the anticipated VMT impact associated with development projects.

- » *Additionality:* Additionality under CEQA refers to the concept that investments made to mitigate environmental impacts should provide benefits that otherwise would not have occurred absent the mitigation program. Although neither CEQA nor SB 743 explicitly refers to the term “additionality” as a statutory requirement, additionality considerations should form a core component of a mitigation bank. Therefore, mitigation projects under the VMT mitigation program are subject to additionality requirements. As such, mitigation projects generally should not include actions that would be reasonably expected to occur otherwise. Projects that are fully funded by other programs would be unlikely to qualify as additional unless it significantly accelerates the timeline for deployment of that project or increases its VMT-reducing capacity. Additionally, for projects that are partially funded, the unfunded portion of those projects would likely be considered additional. Conversely, investment in a project that is “unprogrammed” and “unconstrained” (i.e., no existing plan or funding expectation) would likely be considered additional in most cases.

- **Equity Considerations:** The VMT mitigation program should consider incorporating equity at multiple decision-making points during framework development. For example, SB 535 directed the California Environmental Protection Agency to define and map California’s disadvantaged communities (DACs) in order to more equitably target climate-related investments. DACs are identified as 25% highest scoring census tracts with the in CalEnviroScreen, a statewide mapping tool that evaluates community vulnerability to environmental impacts. The tool assesses a range of indicators, including pollution exposure, proximity to toxic chemicals, sensitive populations, and socioeconomic conditions. The projects in these areas may get higher prioritization.

Similarly, equity can be defined in multiple ways by the administrative agency depending on desires of the participating agencies. Various criteria (e.g., transportation criteria, built environment criteria, socioeconomic and demographic criteria, and environmental criteria) can be considered as equity criteria in the program framework. For example, built environment criteria are described in detail in Geographic Considerations, below.

- **Geographic Considerations:** Fresno County consists of areas with different area types/typographies (e.g., urban, suburban, and rural areas). The amount of VMT reduction for a project depends on its regional placement/geographic location.



C. Overview

For example, 1 mile of sidewalk may provide a bigger benefit in an urban area compared to a rural area, thus prioritizing projects in an urban area compared to rural areas. This prioritization could lead to a situation where all funds from rural areas may be diverted to improvements in urban areas for the biggest benefit, which would put rural areas in the region at a disadvantage. To address this situation,

- » LSA developed an Urban Design Calculator for the City of Fresno that can be rescaled to suit Fresno COG and its member jurisdictions' needs. The intent of the urban design calculator was twofold: to improve project designs so that the development patterns incorporate good design elements for multimodal mobility options and giving developers VMT credit for addition of these features at the project site. Secondly, the urban design calculator gives an opportunity to implement VMT-reducing features/measures closer to the project site instead of paying into off-site mitigations and/or mitigation bank projects that are far away from the project location. If the project still has a VMT impact, then the project can participate in a regional VMT mitigation bank to pay a fee/purchase credits.

- » Other innovative approaches/projects can also be considered for VMT reducing projects in rural areas. For example, safe routes to schools, mobile farmers' markets would encourage other modes of transportation and improve accessibility to destinations. Development of these innovative projects and ideas will require closer collaboration and participation from the local stakeholders. LSA will work with Fresno COG and the stakeholders to develop strategies/measures to address this issue.

City of Fresno
URBAN DESIGN VEHICLE MILES TRAVELED CALCULATOR
Source: LSA's research for analyzing Engineering for People, Pedestrians, Bicycling, Transit, Livability, and Accessing Health and Transit, October 2014

Basic Information

Calculation Run By:

Date of Calculation:

Project Name:

Applicant/Developer:

Major Cross Streets:

Project Address:

APN(s):

Net Project Site Area: acres

Type of Project (Select all that apply):

Single Family Residential

Multi-Family Residential

Office

Hotel/Hospital/Medical Office

Warehouse/Industrial

Other Land Use

Retail

Total Project VMT: 0 VMT

Total VMT Overage: 0 VMT

Does the project have a VMT impact? No

User Guide Basic Information Land Use Parking Trip Reduction Programs Design Transit School

- **Affordable Housing Considerations:** One of the discussions occurring at a state level has been the inclusion of affordable housing as part of VMT mitigation programs. Per recent studies, affordable housing projects tend to lower regional commute/travel and, therefore, VMT. The current LA Metro VMT Mitigation Bank includes several identified affordable housing sites within Los Angeles County that could be developed by collecting fees from their mitigation bank. It is LSA's understanding that there is substantial interest and need of additional housing, including affordable housing in Fresno County. LSA will discuss with the project team and stakeholders about consideration of this provision in the VMT mitigation program.

- **Administrative Considerations:** Fresno County includes 16 individual jurisdictions, and the VMT mitigation framework should provide flexibility for jurisdictions that may choose to opt in or opt out of the program. This flexibility can be incorporated through program covenants or bylaws that establish procedures for joining or exiting the program. For example, the City of Fresno, even though it has a current VMT Reduction Program, has expressed interest in participating in a regional program depending on the outcome of the program (e.g., costs/unit VMT reduced).

At the same time, the framework should recognize that the VMT mitigation program will require resources to support program administration, and these costs should be incorporated into the program structure. A similar approach was used for the City of Fresno's VMT mitigation program, where the City's Public Works Department administers other development-related fee programs and was therefore identified as the most efficient entity to manage the program.

C. Overview

- **Fiscal Framework Considerations:** The fiscal framework should establish a pricing structure and should enable transactions. Although other price structures are available, based on LSA's experience, dollar per unit of VMT reduced might be the most straightforward and easy to understand metric.

This dollar amount can be uniform across the County or the County can be separated into appropriate districts/place types to establish separate unit prices for VMT reduced. Based on previous analysis/experience, LSA anticipates that a uniform \$ per unit of VMT reduced for the entire County might be beneficial, transparent, and easy to understand. However, LSA may explore dollar per VMT reduced based on different districts if the project stakeholders desire. Disaggregation of the County into separate districts may be coordinated with stakeholders with various considerations like urban/rural communities, DACs/non-DACs, and other geographic, socioeconomic, and travel characteristic differences.

Development fees in traditional traffic impact fee methodology (e.g., dollar per single-family dwelling unit, dollar per 1,000 square feet) may not be appropriate for this program because a project's VMT impact (and thus amount of VMT fees) may vary depending on the project's location and proposed land use composition.

- **Monitoring and Reporting Plan:** VMT mitigation programs (VMT banks/exchange programs) will require a thorough process for monitoring and reporting. It is LSA's understanding that the implementation of the VMT mitigation program, including mitigation monitoring and reporting, will be under a future on-call task. However, LSA will coordinate with the project stakeholders to develop a comprehensive framework for the monitoring and reporting elements of the VMT mitigation program.
- **Potential CEQA Challenges:** In addition to the basic requirements for implementing the mitigation framework described above, the development of a bank or exchange program will likely involve discretionary actions by the founding entity to provide additional CEQA protection. This is because of the following reasons:
 - 1) VMT reducing projects require changes in human behavior for ensuring the effectiveness of such projects. Due to the uncertainty of the effectiveness, the VMT-reducing effects from the projects identified through the VMT mitigation program may not achieve their full potential.
 - 2) Similar to traffic fee programs, a VMT mitigation program also does not guarantee the timeline of implementation of VMT-reducing projects identified in the VMT mitigation program.
 - 3) Although the VMT mitigation program is anticipated to collect fees through the program, the collected fees may not be sufficient to implement the VMT-reducing projects.

Because of these uncertainties, LSA prepared an EIR for the City of Fresno's VMT Reduction Program to include a statement of overriding consideration to account for these uncertainties. The intent was that individual land development projects with a significant VMT impact can participate in the VMT Reduction Program and use the EIR to tier off for purposes of their CEQA analysis.

As such, it may be recommended that any agency seeking to develop a regional VMT mitigation program (e.g., a bank or exchange) can apply the same approach if an EIR is created for this program. California courts have recognized that fee-based mitigation programs can provide an effective approach to environmental planning by offering greater certainty to developers while still protecting environmental resources. However, these programs must be evaluated under CEQA before they can be used in place of traditional, case-by-case mitigation measures. Because a VMT mitigation bank or

Critical Fee Development Considerations

- **Keep the VMT reduction fees reasonable.**

This has been the biggest challenge for most/all VMT mitigation programs across the state. LSA successfully addressed this in City of Fresno implementation and will bring that experience to this project. Affordability of VMT pricing was a key consideration in developing the framework. Excessively high fees could hinder economic growth and housing development within the region and prompt developments to relocate to neighboring counties.

- **Selection of transparent, straightforward, and easy to understand fee estimation methodology.** For example, establishing unit cost per VMT reduced is a straightforward element for estimation of fees. Illustration of total fees for a development project through sample project is critical.

C. Overview

exchange would functionally operate (at least for CEQA purposes) in a manner similar to an in-lieu fee mitigation program, this same requirement would likely apply. However, the resulting CEQA review could potentially take the form of a Mitigated Negative Declaration, given that the overall effect of the program would be to reduce VMT impacts.

- **Nexus Study:** A development impact fee is an exaction, outside of a tax or special assessment, imposed by a local governmental agency on new development as a precondition in the development application process. These fees have the sole purpose of defraying all or a portion of the cost of public facilities directly related to the development project (Government Code § 66000(b)). The legal requirements for enactment of a development impact fee program are set forth in Government Code §§ 66000–66025 (also referred to as the “Mitigation Fee Act”), many of which were adopted as part of Assembly Bill (AB) 1600 and thus are often referred to as “AB 1600 requirements.” The Mitigation Fee Act requires that there is an essential nexus between the fees and projects included in the mitigation program. Implementation of a fee-based VMT mitigation bank will require the development of a nexus study.

- **Capital Improvement Program (CIP):** AB 602, also known as the Development Fees: Impact Fee Nexus Study Act, was signed into law in September 2021. AB 602 requires local agencies that conduct an impact fee nexus study to follow specific standards and practices, including, but not limited to: (1) the adoption of an impact fee nexus study prior to the adoption of an associated development fee; (2) identification and explanation of the existing LOS for each public facility and why the new LOS is necessary; and (3) calculation of a fee levied on housing development projects to be proportionate to the square footage of the proposed units, or to make specific findings explaining why square footage is not an appropriate metric to calculate the fees. AB 602 added Section 66016.5 to the California Government Code. Pursuant to California Government Code 66016.5(a)(1), an impact fee nexus study is required to be adopted before the adoption of an associated development fee. Additionally, California Government Code 66016.5(a)(6) requires that large jurisdictions adopt a capital improvement plan (CIP) as part of the nexus study. For nexus study purposes, the CIP shall indicate the approximate location, size, time of availability, and estimates of costs for all facilities or improvements to be financed with the fees, and any alternative (non-fee) funding sources to complete a project. The sources, amounts, and timing of funding should also be referenced in the jurisdiction’s 5-year findings regarding the use of funds. A CIP should be prepared to accompany the nexus study for implementation of a VMT mitigation program.

The requirements and considerations described above are intended for the development of VMT mitigation measures to address VMT impacts associated with land use development projects. VMT impacts resulting from transportation projects, such as roadway widenings, were not considered for development of scope in this proposal. While some mitigation measures may overlap to address impacts for both transportation projects and land use development projects, the focus of this effort is to develop a framework that streamlines mitigation for land use projects rather than transportation projects. LSA will coordinate with Fresno COG to identify potential needs for addressing transportation project impacts and provide recommendations for future consideration.





D. Detailed Work Plan

1. Task Description

Task 0: Project Management

LSA will coordinate and communicate with the Fresno COG project manager and project team throughout the entire project via bi-weekly project meetings, emails, phone calls, etc. LSA will track the project timeline and budget and prepare monthly invoices and project progress reports. Agendas and meeting notes will be prepared for the bi-weekly meeting.

LSA will have a kick-off meeting with the Fresno COG project staff. We will develop a Project Management Plan (PMP) to address the project schedule and all tasks included in the work plan. The PMP specifically and explicitly documents the overall schedule, expectation for the timing of deliverables, chain of communication between the consultant team and the client, resource allocation to achieve milestones, and remedies for noncompliant activities.

LSA has an adopted a Quality Assurance/Quality Control (QA/QC) procedure that ensures we deliver products that meet our established standards. All work products are reviewed by the project manager and the Principal in Charge. The reports will be reviewed by an in-house technical editor and formatted by LSA's Document Management staff prior to submittal to ensure that documents arrive for review in final Form. LSA will apply the QA/QC procedure in the reviewing of all the draft reports that are part of the deliverables of this project.

Deliverables:

- Meeting agendas and meeting notes
- Invoices and progress reports

Task 1: Convene Stakeholder Committee (Local Agencies, Development Community, and Technical Consultants)

After consulting with Fresno COG project staff, LSA will develop a list of potential candidates for the Stakeholder Committee. LSA staff will reach out to the candidates and invite them to participate in the study as committee members. The Stakeholder Committee could include, but is not limited to, representatives of the following:

- Local governments
- Transit agencies
- Caltrans
- Development communities
- Affordable housing entities
- Private sector consulting firms who are interested in VMT mitigation

- Community organizations
- General public

The Stakeholder Committee will meet quarterly, four times throughout the project. The committee will receive updates on the progress and findings of the project and provide input and feedback on critical issues (e.g., geographical equity, prioritization of strategies).

Working with Fresno COG staff, LSA will develop agendas for the committee meetings. Agendas will be sent out a week prior to the committee meetings. Meeting minutes will be submitted to Fresno COG staff for review and distribution. LSA staff will follow up on the action items from the committee meetings and report back to Fresno COG.

All four Stakeholder Committee meetings will be held online unless there is special request from Fresno COG or the committee for an in-person meeting.

Deliverables:

- Stakeholder Committee Roster with contact information
- Meeting agendas and minutes for the Stakeholder Committee meetings
- PowerPoint presentations
- Other handouts and materials developed for the Stakeholder Committee to review

Task 2: Review Phase I VMT Mitigation Program Study and Highlight Key Recommendations

LSA will review the Phase I VMT Mitigation Study report and summarize the recommendations from the Phase I study. LSA will share the findings and recommendations with Fresno COG staff and the Stakeholder Committee. Building on the work from Phase I, LSA will take the Fresno COG VMT mitigation program a step further and develop a framework that will be implementation ready.

The Phase I study examined the overall regional VMT mitigation need, compared the pros and cons of various mitigation programs, explored monetizing VMT mitigation by project types, and discussed potential strategies to address equity issues.

LSA will work with Fresno COG staff and the Stakeholder Committee to determine the appropriate approach to identify a list of VMT-reducing projects that will eventually be included in the VMT mitigation program. These projects will be evaluated and prioritized as part of Task 6. Additionally, the unfunded costs of these selected projects will also be accounted for based on discussions with Fresno COG and its member agencies. A streamlined process will be developed in coordination with Fresno COG staff to identify VMT mitigation measures for the VMT mitigation program.

Deliverables:

- Summary Memorandum of findings and recommendations from Phase I of the VMT mitigation program study
- Summary Memorandum of framework plan for Phase II program implementation and methodology to shortlist VMT-reducing projects



D. Detailed Work Plan

Task 3: Organize Agency Practitioner Panel on VMT Mitigation Program Experience and Best Practices

Working with Fresno COG staff, LSA will organize an expert panel that will include, but not be limited to, agency staff who have worked on similar VMT mitigation programs, technical experts from private firms, and Caltrans SB 743 program staff.

This Technical Expert Committee (TEC) will serve two purposes. The TEC members will be invited to share their experience and lessons learned from their work related to VMT mitigations programs. In addition, the TEC will serve as a peer review group who will critique the proposed approach for the Fresno COG VMT Mitigation program in addition to providing input, ideas, and recommendations to the process.

LSA team proposes to conduct a total of up to four TEC meetings at various critical points of the project and before any key decisions are made.

The LSA Team will work with Fresno COG to identify TEC members. Potential candidates include, but are not limited to the following entities:

- City of Fresno
- Contra Costa Transportation Authority
- City of Riverside
- Western Riverside Council of Governments (WRCOG)
- San Luis Obispo Council of Governments (SLOCOG)
- City of San Jose
- Private consultant (Potential firms could be identified from the Fresno COG's preferred SB 743 modeling consultant list)
- Caltrans SB 743 program technical staff

LSA will summarize in a memorandum the existing VMT mitigation programs in the State and document the lessons learned and experience shared by the expert panel.

Deliverables:

- Roster of panel practitioners and planners with contact information
- Meeting agenda and minutes of up to four TEC meetings
- Summary Memorandum of the existing VMT mitigation program and its framework in the State, shared by the panel along with the recommendations for implementation in Fresno region

D. Detailed Work Plan

Task 4: Evaluate Regional VMT Mitigation Program Options and Assess Feasibility for the Fresno Region (Including Additionality and Equity Considerations)

LSA will evaluate the strength and suitability of the potential VMT mitigation programs that are being implemented and considered by other agencies in the State. Such programs include, but are not limited to, VMT mitigation banks, VMT exchanges, regional impact fees, or any other hybrid approaches (e.g., a fee-based VMT mitigation bank).

Working with Fresno COG staff, the TEC, and the Stakeholder Committee, LSA will develop an evaluation matrix to compare the pros and cons of the different VMT mitigation programs that are being considered for the Fresno County region. Such evaluation criteria could include, but are not limited to the following:

- **Legal compliance.** This metric will look at whether the mitigation program meets the CEQA requirements, including establish of an “essential nexus” between the mitigation fee and the targeted projects that will pay into the fee program.
- **Cost effectiveness.** At a high level, a qualitative measure will be applied to evaluate the cost effectiveness of each of the programs evaluated. The TEC’s experience with various programs would be valuable in the evaluation of this measure. Once a VMT mitigation program is identified, a quantitative methodology will be created to develop cost numbers for potential implementation. Task 6 will provide a specific approach to developing mitigation cost for VMT that cannot be mitigated to a less than significant level. This metric ensures that a program that is cost-effective and feasible for the Fresno region is selected to be further developed into an implementation ready framework.
- **Additionality.** CEQA ensures that mitigation measures must provide new quantifiable improvements/environmental benefits that would otherwise not occur if not for the program/project. It requires that mitigation measures are not already funded and/or only partially funded and cannot take credit for pre-existing fully funded programs/projects. A qualitative screening will be conducted for this task. This metric will be taken into consideration in Task 6 when VMT reductions projects/programs are selected to be included in the Fresno COG VMT Mitigation Program. Under this metric, RTP projects could be considered having met the additionality requirements if the project delivery could be advanced or funding gap could be provided to advance the project.
- **Equity.** The equity metric will consider two types of equity in the region. One is geographic equity which will address the fair distribution of funding collected through the VMT mitigation program. A level of reinvestment back into the community where the mitigation fee is collected would be guaranteed. The other equity refers to the investment in the disadvantaged communities in Fresno County that have been historically disinvested. A qualitative screening will be conducted for this task. Under Task 6, LSA will work with Fresno COG staff and the Stakeholder Committee to develop a more specific investment strategy to address the equity issue.
- **Proportionality.** CEQA mitigation measures must have a "rough proportionality" to the environmental impacts of a project, ensuring measures directly address and are not excessive compared to the impact. This nexus requires that mitigation is legally and physically feasible, directly addressing the specific, significant adverse impacts identified. A qualitative screening will be conducted to compare the mitigation programs. Task 6 will address the proportionality of specific programs/projects. For example, Caltrans issued direction for the



D. Detailed Work Plan

“proportionality” of affordable housing as a mitigation measure. A gap funding could be provided to affordable housing projects, but agencies can take full credit from the entire project as long as no other entities have done so.

- Administration. This metric will compare the potential cost and feasibility of administering the various VMT mitigation programs. LSA will conduct research on the existing VMT program and the experience/input from the TEC will be incorporated into this metric.

Deliverables:

- A list of evaluation metrics and evaluation results
- Summary Memorandum of regional VMT mitigation implementation frameworks based on recommendation from Phase I study
- Summary Memorandum of evaluation of various alternatives considering additionality, equity, and other metrics

Task 5: Develop Implementation Framework for a Regional VMT Mitigation Program in the Fresno Region (Agency Structure, CEQA, Legal, Nexus, and Bank Integration)

As previously noted, LSA will work with project stakeholders to identify the most appropriate VMT mitigation program for implementation in Fresno County. Based on the Phase 1 recommendations and research conducted by LSA, LSA recommends establishing a fee-based VMT mitigation bank for the region.

Program Framework:

The suggested framework and the requirements for implementation of the framework have been described in detail in the proposal overview section.

LSA will prepare a memorandum outlining the process used to select the preferred framework for implementing a regional VMT mitigation program. The memorandum will summarize the advantages and potential limitations of the selected framework and will describe the key requirements and pathway for implementing the preferred approach.

Program Application:

To demonstrate how the proposed program would function in practice, the following steps illustrate the anticipated process for project applicants or land use developers:

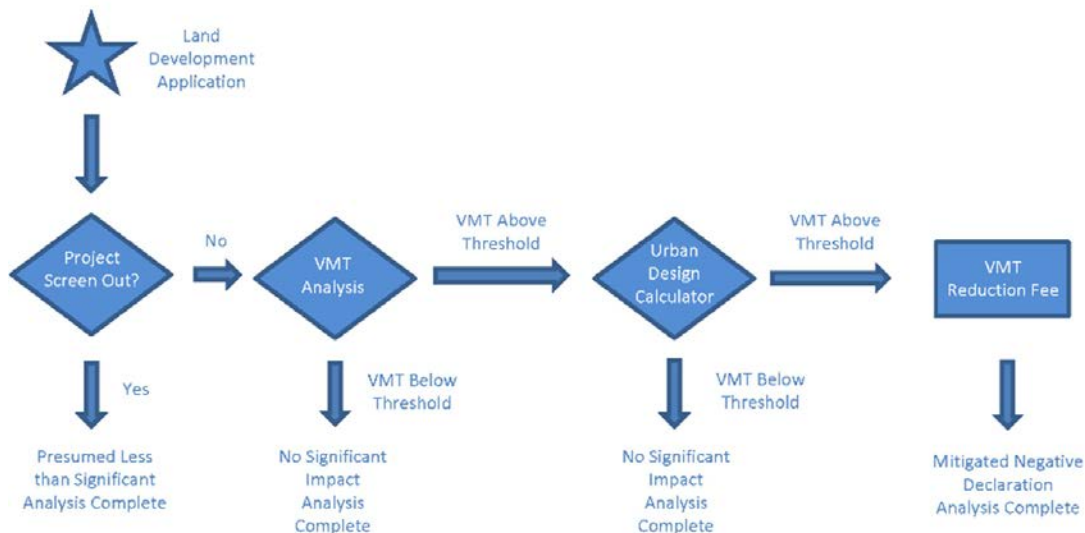
- Once a development project is ready for review, it will first be evaluated using the local jurisdiction’s VMT screening criteria to determine whether the project can be screened out of a detailed VMT analysis.
- If the project does not qualify for screening, a project-level VMT analysis will be required using the Fresno COG ABM.



D. Detailed Work Plan

- 3) If the VMT analysis indicates that the project would result in a significant VMT impact, the project will proceed through the following steps to address the impact.
- 4) The project applicant may first explore and utilize the Urban Design Calculator to identify project design features that could be modified to achieve VMT reductions. This approach prioritizes implementation of on-site VMT-reducing design features before relying on programmatic mitigation.
- 5) If the project's VMT impact can be reduced to a less-than-significant level through design modifications identified using the Urban Design Calculator, the project would not be required to contribute to the VMT mitigation program.
- 6) If significant VMT impacts remain after applying feasible design modifications, the project would calculate the applicable fee to be paid into the VMT mitigation program based on the magnitude of the remaining VMT impact.

VMT Mitigation Process



Based on LSA's experience, jurisdictions within Fresno County are currently uncertain about the most effective approach to address VMT mitigations for land development projects. The establishment of a regional VMT mitigation program would provide a consistent and streamlined framework for jurisdictional development review while offering jurisdictions a feasible and effective mechanism to address VMT impacts. A regional program would also provide greater flexibility in identifying, prioritizing, and implementing VMT-reducing projects that deliver meaningful regional benefits.

LSA will prepare a memorandum outlining the process for jurisdictions to participate in the regional VMT mitigation program, as described in the Administrative Considerations section of the proposal overview. The memorandum will identify key participation requirements, governance considerations, and administrative procedures for joining the program. It will also evaluate opportunities to coordinate and integrate existing jurisdictional VMT mitigation programs within the region into the proposed regional framework to ensure consistency, efficiency, and long-term program effectiveness.

Deliverables:

- Summary Memorandum of finalized regional VMT mitigation program framework for Fresno County and its plan
- Summary Memorandum of coordination effort within the region considering the CEQA requirement and legal implications in relation to existing legal challenges around the State
- Summary Memorandum of tying this program with the existing VMT mitigation program in the region

Task 6: Coordinate with Fresno COG and Stakeholders to Define Mitigation Measures, Develop Cost Estimates, and Quantify VMT Reductions

LSA will coordinate with Fresno COG and the stakeholder committee to identify potential mitigation measures for inclusion in the VMT mitigation program. These measures may include a range of project types, such as capital or land use projects, operational improvements, programs, and other supporting initiatives. The types of projects eligible for inclusion in the program will depend on the specific VMT mitigation program structure that is selected. For example, a fee-based VMT mitigation bank provides the greatest flexibility and can accommodate a wide range of project types, including all of those described above.



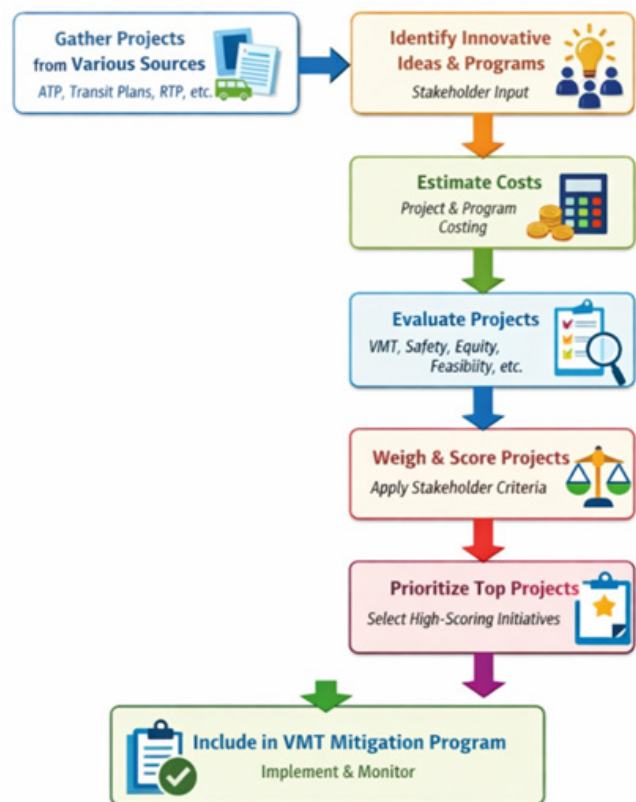
Potential Mitigation Project/Sources:

LSA will work with Fresno COG, the member agencies, the three transit agencies, and other stakeholders (e.g., affordable housing entities, Caltrans) to select a list of eligible VMT reduction projects for the program. Such projects include, but are not limited to, transit, bike/ped, transportation system management (TSM) projects (e.g., carpool/vanpool), and affordable housing projects. Potential mitigation measures can be obtained from multiple existing documents such as the following:

- Fresno COG RTP
- Fresno COG Active Transportation Plan
- Transit agencies' short-range/long-range plans
- Existing and potential expansion of Transportation Demand Management programs (e.g., vanpool, carpool)
- Existing and potential expansion of any Safe Routes to School programs/plans
- Existing local jurisdiction General Plans
- Other plans/studies from local jurisdictions

LSA recommends using existing plans and program documents as a primary source for identifying potential mitigation projects. Although new projects or programs could also be considered, they may present additional challenges related to demonstrating additionality and the resources required to develop and implement new initiatives.

In contrast, many projects identified in existing plans may already have partial funding secured through other sources. For example, a transit improvement project may receive a portion of its funding from the Federal Transit Administration (FTA). Without the local match, the project may not be implemented. In such cases, providing the local match through the VMT mitigation program would satisfy the additionality requirement. Because no other agency would claim the VMT reductions associated with the project, the program could attribute the full VMT reduction to the project while contributing only a portion of the total project cost.



Mobility Hubs as VMT Mitigation Measure

LSA is currently assisting the Fresno Council of Governments (COG) with a Mobility Hub Feasibility Study that developed Mobility Hub Implementation Guidelines. Mobility hubs are inter-modal hubs that integrate multiple transportation options—such as walking, biking, carpooling, ridehailing, etc.—with transit services, to help people make seamless transfer between different transportation modes. LSA’s experience from this study provides valuable insight for considering and evaluating mobility hubs as potential VMT mitigation measures.

This approach suggests that prioritizing projects that can leverage other funding sources may be advantageous. Although more innovative or standalone projects could also be pursued, identifying, developing, and funding these projects would likely require additional time, effort, and financial resources.

In addition to reviewing existing plans and program documents, LSA will coordinate with local jurisdictional stakeholders to obtain input on community needs and opportunities that could support VMT reduction. Examples may include projects such as establishing Safe Routes to School programs or addressing gaps in pedestrian infrastructure.

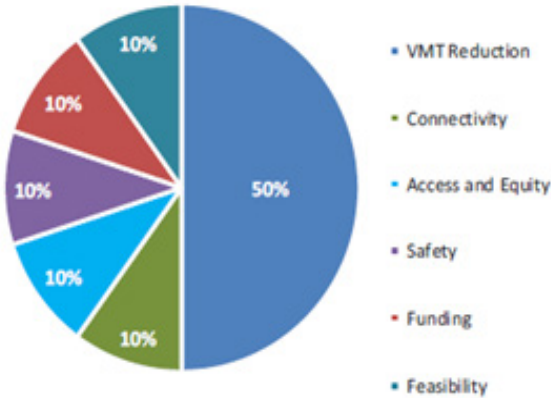
In coordination with project stakeholders, LSA will also explore other non-traditional project types that may contribute to VMT reduction, such as affordable housing initiatives, expansion of high-speed internet infrastructure to support telecommuting, telemedicine and tele-education, and electric vehicle charging infrastructure.

Project/Program Costs:

As previously noted, LSA anticipates that projects identified in existing plans and program documents will comprise the majority of the VMT mitigation program. These projects typically include preliminary cost estimates, which LSA will use where available. Where cost information is not readily available, LSA will coordinate with project sponsors and relevant stakeholders to develop reasonable planning-level cost estimates.

For VMT mitigation programs and operational strategies, LSA will work with stakeholders to establish appropriate assumptions (e.g., additional transit service hours or expanded program participation) to estimate implementation costs. LSA will also consult with relevant agencies to obtain applicable unit cost information, which will be used to develop program-level cost estimates.

Evaluation and Prioritization Weights



Mitigation Project Evaluation and Prioritization:

LSA conducted extensive research on the evaluation of VMT mitigation measures across all four project categories during the development of the City of Fresno’s VMT mitigation program. In addition, LSA has evaluated VMT reduction strategies for numerous development projects from a private development perspective.

LSA will work with Fresno COG and the Stakeholder Committee and develop a list prioritization metrics to prioritize the selected projects for funding purposes. Based on previous experience, LSA recommends incorporating additional evaluation criteria (beyond the magnitude of VMT reduction) to capture the broader benefits associated with potential mitigation projects. For example, candidate projects can be evaluated using a matrix of factors that considered multiple performance criteria in addition to VMT reduction, such as the following:

- Connectivity
- Access and Equity
- Safety
- Funding
- Feasibility

Project evaluation scores will be weighted using these factors, based on input and direction from project stakeholders, to develop a final composite project score. The evaluation framework is designed to be flexible, allowing jurisdictions to adjust the weighting of evaluation criteria to reflect local priorities and preferences. The project evaluation will be based on data from multiple existing sources such as the following:

- California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity
- Peer jurisdictional tools (e.g., LA Metro’s Excel tool)
- Academic research
- Fresno COG ABM
- Experience from the City of Fresno’s program

Project evaluation will rely on information from existing data sources (e.g., the Fresno COG ABM) and datasets describing existing sidewalks, bicycle lanes, and transit service. During development of the City of Fresno VMT Reduction Program these data were compiled and maintained within a GIS database by LSA and was used to support project evaluation. This approach streamlined the evaluation process and provided an efficient and time-saving method for assessing potential mitigation projects. LSA intends to apply a similar data-driven approach for this project.

Project prioritization will be based primarily on the weighted evaluation scores described above. Additional factors may also be considered to ensure the program supports projects that are both impactful and implementable. For example, “shovel-ready” projects that require only partial funding may be prioritized to accelerate implementation of VMT-reducing improvements.

Similarly, projects serving exurban and rural communities may receive additional consideration to ensure equitable geographic distribution of program benefits. These prioritization factors will be refined in coordination with project stakeholders prior to finalizing the list of projects included in the program.

Deliverables:

- Development of potential VMT reduction project list
- Summary Memorandum with quantification on cost and benefits of potential VMT reduction projects
- Project prioritization metrics and prioritized project list

Disadvantaged Communities

As described in the Overview section, there are many disadvantaged communities in Fresno County that have been historically disinvested. Eligible projects in such disadvantaged communities should be considered to receive favorable scorings during the project prioritization process. The consultant team will work with Fresno COG and the Stakeholder Committee and incorporate equity factor into the project scoring/funding allocation process for the disadvantaged communities.

Task 7: Establish Monitoring, Data Collection, and Verification Protocols for VMT Reductions and Provide On-Call Implementation Support

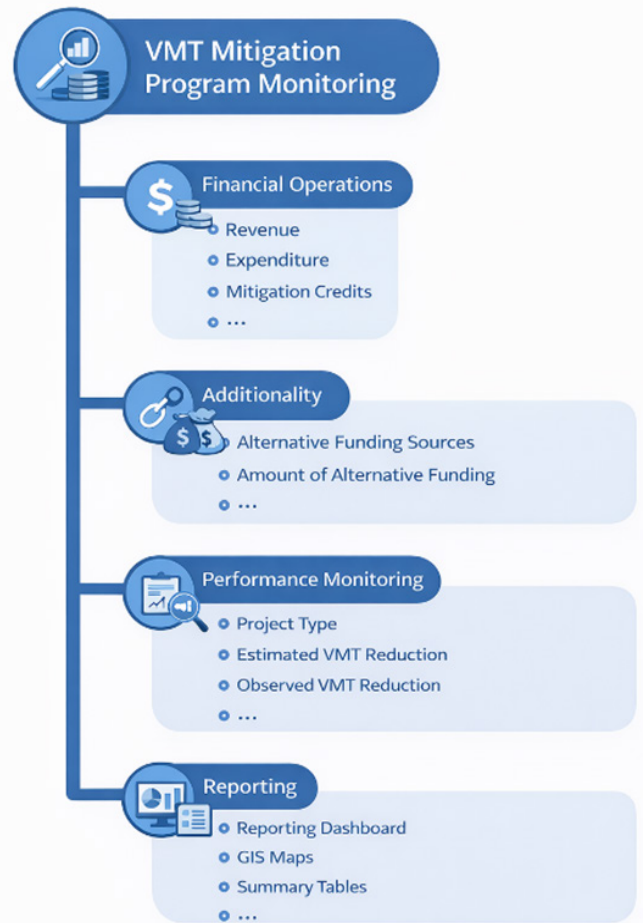
VMT mitigation programs (e.g., VMT banks/exchange programs) will require a thorough process for monitoring and reporting. LSA will coordinate with the project stakeholders to develop a comprehensive framework for monitoring and reporting elements of VMT mitigation program. In addition to making sure the mitigation measures (VMT mitigation projects, programs) are actually implemented and comply with the VMT mitigation program framework, existing research recommends tracking the following categories of information:

Financial Operations Monitoring/Reporting:

The financial management monitoring framework should address both fund management and investment management. Fund management ensures that revenues are received and administered in accordance with the established fiscal framework, while investment management ensures that funds are directed toward VMT-reducing investments consistent with the adopted project list and prioritization criteria.

The framework should include a financial ledger system to track program revenues, including projects entering the program, VMT reductions purchased, and revenues received. Similarly, the disbursement of funds should be documented and tracked, including mitigation investments funded through the program and the VMT reductions allocated to those investments.

The financial system should be transparent so that program revenues, expenditures, and VMT reduction allocations can be clearly tracked, audited, and reported to program administrators, decision-makers, and the public.



VMT-GENERATING PROJECT	VMT IMPACT	DOLLAR/CREDIT COST	MITIGATION INVESTMENT	FUNDED	VMT REDUCTION	DOLLAR/CREDIT COST
A	50	\$50,000	W	Yes	60	\$60,000
B	25	\$25,000	X	Yes	10	\$10,000
C	10	\$10,000	Y	No	--	--
			Z	Yes	15	\$15,000
Total	85	\$85,000			85	\$85,000

Table 3: Sample mitigation bank ledger. (Note: sample entries, including sample VMT cost of \$1,000, are simplified and included only for illustrative purposes.)

Source: University of California, Berkeley. 2022. Implementing SB 743 – Design Considerations for Vehicle Miles Traveled Mitigation Bank and Exchange Programs, August Policy Report.

Additionality Compliance Monitoring:

LSA will review the additionality of projects prior to their inclusion in the program. However, as previously noted, many of the projects selected for the program may also receive funding from other sources. Therefore, the administrative body should conduct periodic check-ins with stakeholders and jurisdictions to confirm that the additionality of these projects remains valid. For example, projects may receive additional funding after being included in the program, or jurisdictions may apply for other eligible funding sources. Periodically verifying project additionality will help ensure that the program maintains compliance and avoids potential legal issues.

Performance Monitoring:

CEQA generally does not require long-term monitoring of the effectiveness of mitigation measures; instead, it requires monitoring or reporting to confirm that mitigation measures are implemented and maintained as approved. However, monitoring the performance of VMT mitigation projects will be important for the long-term success of the program. This monitoring will help assess real-world performance, identify projects that achieve greater VMT reductions, and inform updates to the program in future cycles.

The administrative body should reserve funding within the program to support project performance monitoring. Participating jurisdictions could request that developers collect data for on-site VMT reduction measures included in development agreements, but this approach may be difficult to implement and enforce consistently. Incorporating monitoring costs into the program and assigning responsibility to the administrative body would likely be the most effective approach.

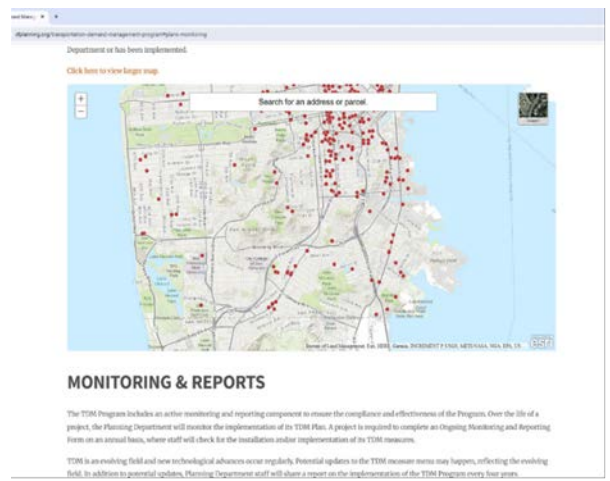
Reporting:

The administrative entity of the program should present bank/exchange monitoring information in a publicly accessible format. This information will help inform lead agencies, participating jurisdictions, and developers about program operations and mitigation opportunities, while also providing transparency to the public about VMT mitigation projects and their benefits. This information should include financial operations, mitigation compliance, and project additionality. Ideally, the program should include a mapping or GIS-based platform showing where mitigation investments are located within the bank/exchange region and how they correspond to VMT impacts generated elsewhere. For example, the San Francisco Transportation Demand Management Program’s monitoring webpage, which offers a map of all projects and quarterly “monitoring dashboard” reports that include program performance statistics, is another example of such a platform.

IF THE MITIGATION PROJECT IS A TRANSIT OR TRANSPORTATION PROJECT:

Project Type	Documentation
Unprogrammed and in the unconstrained portion of the RTP	<ul style="list-style-type: none"> - Project location/status within RTP - Investment type: <ul style="list-style-type: none"> - New construction/installation - Previously unfunded project phase/stage - Increased capacity/reliability - Accelerated deployment - Additionality of VMT reduction compared to baseline
Unprogrammed and in the constrained portion of the RTP	<ul style="list-style-type: none"> - Project location/status within RTP - Investment type: <ul style="list-style-type: none"> - Previously unfunded project phase/stage - Increased capacity/reliability - Accelerated deployment - Additionality of VMT reduction compared to baseline

Source: University of California, Berkeley. 2022. Implementing SB 743 – Design Considerations for Vehicle Miles Traveled Mitigation Bank and



source: San Francisco Transportation Demand Management Dashboard (<https://sfplanning.org/transportation-demand-management-program#plans->

On-call Support for Implementation:

LSA will provide on-call support during and after implementation of the VMT mitigation program. For example, we are currently providing on-call support to the City of Fresno following implementation of its VMT mitigation program and assisting the City in responding to questions from City staff, developers, and internal stakeholders.

Given the relatively new nature of VMT mitigation programs, we anticipate that questions and implementation challenges may arise as the program is put into practice. Our team will be ready and available to provide ongoing technical assistance, including responding to stakeholder inquiries, and clarifying program procedures in addressing implementation issues that may emerge over time.

As mentioned in the project overview section, implementation of a VMT mitigation program will require development of a nexus study and preparation of a CIP. LSA can assist Fresno COG and stakeholders in the development of a Nexus Study and CIP as part of the on-call contract. The development of the nexus study will comply and be consistent with the requisite statutory findings contained in § 66001 of the Mitigation Fee Act by identifying the purpose of the fee, how the fee is being utilized, and demonstration of mitigation measure feasibility and effectiveness. The nexus study will provide justification and nexus between anticipated VMT growth and proposed mitigation measures, costs, and fees.

Deliverables:

- Program implementation and monitoring plan/tool
- Preliminary on-call contract plan after the development of VMT reduction implementation program

Task 8: Prepare and Circulate Draft Report for Public Review

Upon completion of all the previous tasks related to the VMT mitigation program, LSA will develop a draft VMT Mitigation Program Report and submit it to Fresno COG for review. The draft report will then be shared with the Stakeholder Committee for their feedback and comments. LSA will collect comments from Fresno COG and stakeholders and update the document accordingly. The report will then be published for a 30-day public review. LSA will address the comments from the public accordingly in cooperation with Fresno COG staff.

Deliverables:

- Draft plan and summary of comments from the Stakeholder Committee and Fresno COG staff
- Responses to public comments
- Draft final report incorporating all comments from Fresno COG staff, the Stakeholder Committee, and the public

Task 9: Present Final Report to Fresno COG Committees and Policy Board for Acceptance

LSA will present the report and its findings and recommendations to the Fresno COG Transportation Technical Committee (TTC), Policy Advisory Committee (PAC), and Fresno COG Policy Board.

LSA will develop a PowerPoint presentation and submit it for review by Fresno COG staff before the presentations. LSA project staff will be available to attend the TTC, PAC, or Policy Board meetings either online or in person. For purposes of this scope of work, LSA assumes that two of the three meetings will be virtual and LSA will need to present in person at one of the meetings.

Deliverables:

- PowerPoint Presentation
- Final Plan and Presentation at TTC/PAC/Fresno COG Policy Board

D. Detailed Work Plan

Task 10: CEQA Compliance/EIR

As stated in the Project Overview section, the Regional VMT Mitigation Program may not provide adequate VMT mitigation to enable projects to achieve a less than significant impact under CEQA. Therefore, following preparation of the Regional VMT Mitigation Program, LSA can prepare a program-level Environmental Impact Report (EIR) consistent with the California Environmental Quality Act (CEQA), in order to evaluate potential environmental impacts associated with implementation of the Regional VMT Mitigation Program. An EIR is anticipated to be prepared to address the uncertainty of how and when the Regional VMT Mitigation Program would be implemented. At this time, it is anticipated that, through the use of a VMT impact fee/mitigation bank, regional VMT-reducing projects would be funded and constructed. However, because VMT impact fees/mitigation bank would be collected from future projects, the timing of when fees would be collected and then used for construction of regional VMT-reducing projects is not known. In addition, the effectiveness of regional VMT-reducing projects is not known because it is anticipated that VMT-reducing projects would require behavioral change to reduce VMT. Therefore, it is not known when or if regional VMT impacts would be mitigated to less-than-significant levels.

To address the uncertainty of reducing regional VMT impacts LSA would prepare a program-level EIR for the Regional VMT Mitigation Program, and LSA would assist Fresno COG staff with meeting all CEQA requirements. If significant and unavoidable impacts are identified, LSA will provide substantial evidence and justification to make those determinations. LSA will incorporate the work of in-house technical specialists to evaluate air quality and greenhouse gas emissions, biological resources, cultural resources, noise, and transportation. LSA will prepare the following, including iterative review draft for Fresno COG staff:

- Project Description
- Notice of Preparation
- Draft EIR
- Response to Comments Document
- Findings of Fact/Statement of Overriding Considerations
- Notice of Determination

Prior to initiation of work, LSA will provide a detailed scope of work that would identify the specific tasks required, the overall schedule for the EIR, and budgets for each task.

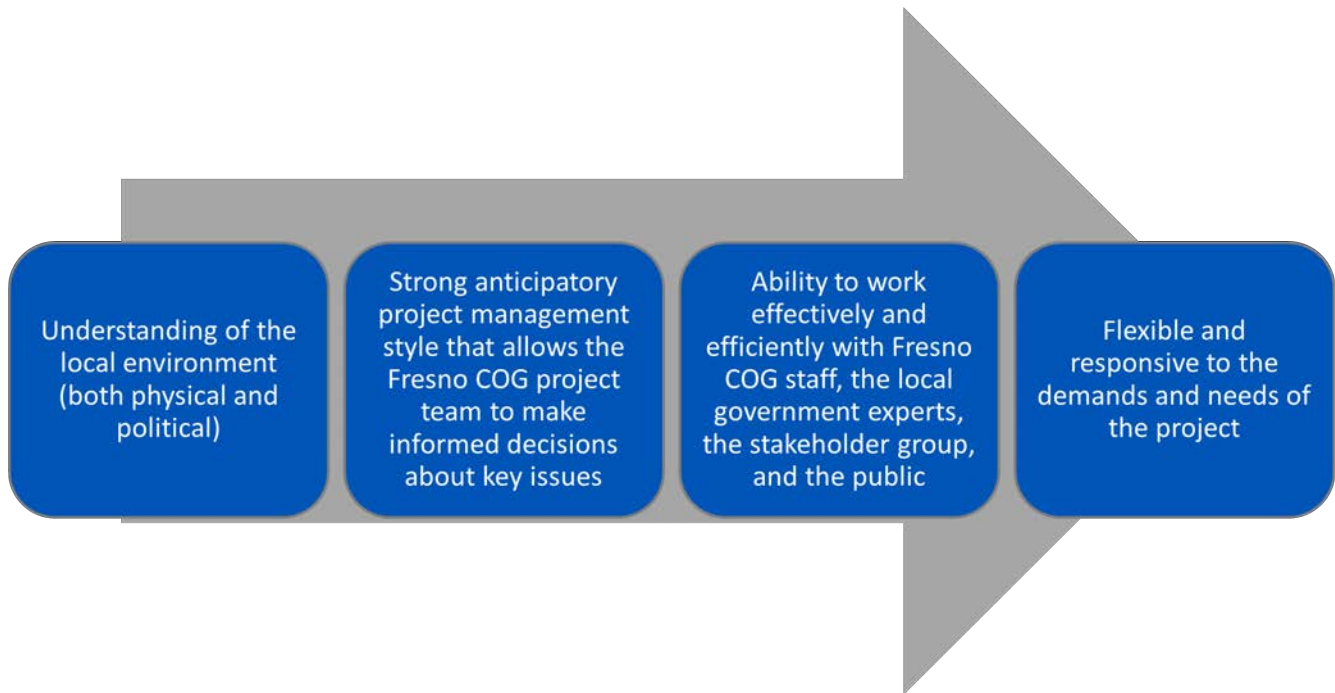
2. Deliverables

Task	Deliverable(s)
Task 0	<ul style="list-style-type: none"> Meeting agendas and meeting notes Invoices and progress reports
Task 1	<ul style="list-style-type: none"> Stakeholder Committee Roster with contact information Meeting agendas and minutes for the Stakeholder Committee meetings PowerPoint presentations Other handouts and materials developed for the Stakeholder Committee to review
Task 2	<ul style="list-style-type: none"> Summary Memorandum of findings and recommendations from Phase I of the VMT mitigation program study Summary Memorandum of framework plan for Phase II program implementation and methodology to shortlist VMT reducing projects
Task 3	<ul style="list-style-type: none"> Roster of panel practitioners and planners with contact information Meeting agenda and minutes of up to four TEC meetings Summary Memorandum of the existing VMT mitigation program and its framework in the State, shared by the panel along with the recommendations for implementation in Fresno region
Task 4	<ul style="list-style-type: none"> A list of evaluation metrics and evaluation results Summary Memorandum of regional VMT mitigation implementation frameworks based on recommendation from Phase I study Summary Memorandum of evaluation of various alternatives considering additionality, equity, and other metrics
Task 5	<ul style="list-style-type: none"> Summary Memorandum of finalized regional VMT mitigation program framework for Fresno County and its plan Summary Memorandum of coordination effort within the region considering the CEQA requirement and legal implications in relation to existing legal challenges around the State Summary Memorandum of tying this program with the existing VMT mitigation program in the region
Task 6	<ul style="list-style-type: none"> Development of potential VMT reduction project list Summary Memorandum with quantification on cost and benefits of potential VMT reduction projects Project prioritization metrics and prioritized project list
Task 7	<ul style="list-style-type: none"> Program implementation and monitoring plan/tool Preliminary on-call contract plan after the development of VMT reduction implementation program
Task 8	<ul style="list-style-type: none"> Draft plan and summary of comments from Stakeholder committee, COG staff. Responses to public comments Draft final report incorporating all comments from Fresno COG staff, the Stakeholder Committee and the public
Task 9	<ul style="list-style-type: none"> PowerPoint Presentation Final Plan and Presentation at TTC/PAC/Fresno COG Policy Board
Task 10 (Optional)	<ul style="list-style-type: none"> Project Description Notice of Preparation Draft EIR Response to Comments Document Findings of Fact/Statement of Overriding Considerations Notice of Determination



E. Management Approach

LSA approaches each project with the goal of functioning as an extension of agency staff. This approach gives LSA insight into preparing comprehensive documents with local context that allow for agency decision-makers, members of the public, and Fresno COG staff to easily understand the project under consideration. We believe that, as the consultant conducting the Regional VMT Mitigation Program, we can offer a path for success.



Our approach is to identify issues early in the process and work diligently with the project team to develop effective solutions. LSA's ability to deliver spans the entire life cycle of a project. Key strengths that LSA brings to Fresno COG are:

- **Understanding of Agency Staff Needs.** Through our experience working with public agencies, we know that agency staff can be stretched thin by the time and effort required to manage multiple programs/projects. We believe that the ability of LSA staff to work independently of, but in close communication with, agency staff is one of our greatest assets. We routinely assist staff with meeting agendas/minutes, the preparation of staff reports, and presentations. We are adept at responding to questions from decision-making bodies about complex projects and planning issues.

E. Management Approach

- **Tenacious Attention to Deadlines and Schedule.** LSA frequently works with clients to develop aggressive schedules to accommodate deadlines as they may relate to project funding and implementation, timing of public hearings, or construction time frames. Schedules may be condensed through early agreement on the project description, swift transmittal of needed data, and shortened review periods. Agency staff and applicants find that LSA is exceptionally responsive and will go the extra mile to achieve the agreed-upon schedule(s).

- **Proactive Project Management.** LSA provides comprehensive, active project management, ensuring overall project quality, coordination, and timeliness. Each of LSA's assigned staff members is skilled at anticipating and dealing with issues that may arise during the course of the project. Rather than postpone difficult issues or unpleasant news, LSA's approach is to raise issues early and solve problems. LSA's Project Manager, Ambarish Mukherjee, PE, AICP, is committed to meeting with Fresno COG's Project Manager biweekly to report project progress and discuss any foreseeable potential issues.

- **Senior Staff Involvement.** LSA is committed to the use of senior-level staff. As seen below in this submittal, the majority of our team members are senior level technical specialists. For any project that LSA undertakes, the project team is directed by a Principal of the firm and managed by, at a minimum, a Senior Project Manager. The management team will oversee the project, coordinate with Fresno COG staff, and ensure that all tasks are completed in an efficient, cost-effective, and timely manner.

- **Objective and Impartial Analysis.** We undertake our research, analysis, writing, and presentations with the aim of providing technically competent and scientifically objective work products. Our contribution to promoting the applicant's objectives focuses on preparing documents that are technically thorough and conducting the public review process in a way that is transparent and accessible. We believe that the best advocacy is a document that is impartial, above reproach, and legally/technically robust.

The LSA Team understands that there may be multiple approaches to address issues and to meet standards. LSA's Principals and Project Managers have a proven ability to discuss multiple approaches and objectives with the agency staff and stakeholders (as necessary) and come to an agreement on the approach that best meets Fresno COG's needs for complying with relevant regulations and the requirements of the decision-makers.



Quality Control Procedures

This project will be overseen by LSA's Principal, Kristine Cai, and managed by our highly qualified Project Manager, Ambarish Mukherjee, PE, AICP, both of whom have more than two decades of similar project experience. In accordance with LSA's Quality Assurance/Quality Control (QA/QC) Policy, all substantial work products are reviewed at the Principal level. LSA's operational standard of Principal oversight of technical efforts guarantees the delivery of accurate, timely, comprehensive, and legally defensible documents to support the proposed project actions. All work products are also reviewed by an in-house technical editor and formatted by LSA's document management staff prior to submittal to ensure that documents arrive for review in final form, allowing Fresno COG's reviewers to concentrate on issues of substance rather than on editing tasks.

E. Management Approach

LSA Team

LSA has built a strong, experienced, and versatile team to fulfill the full scope of services required for this project. The LSA Team will be led by **Ambarish Mukherjee, PE, AICP**, who will serve as Project Manager, and **Kristine Cai, who will serve as Principal in Charge**. LSA will not substitute members without approval from Fresno COG. The following section presents an introduction to our project management team, followed by our key personnel. **Full resumes for our proposed team are provided in Appendix A.**



Ambarish Mukherjee, PE, AICP
Principal Transportation Planner

Role: Project Manager

Mr. Mukherjee has 21 years of experience working on and managing both transportation planning and traffic modeling projects. He has extensive knowledge of VMT analysis methodologies and has conducted VMT analysis for many projects, including preparation of VMT guidelines for Fresno COG, Merced County Association of Governments (MCAG), City of Visalia, City of Big Bear Lake VMT, City of Long Beach, City of Newport Beach, City of Fresno, City of Hanford, City of Lemoore, City of Banning, and County of Orange. Additionally, **Mr. Mukherjee has prepared multiple VMT analyses** for General Plans, Specific Plans, land use and transportation projects. *Mr. Mukherjee was the Project Manager/Principal in Charge for the City of Fresno VMT Reduction Program. The program includes an Urban Design Calculator that allows land use projects to implement VMT mitigations at a site-specific level and a VMT mitigation bank. Mr. Mukherjee is also the task manager for preparation of a VMT mitigation analysis for the Interstate (I) 405 Express Lanes Project, which utilizes a combination of strategies from the Los Angeles County Metropolitan Transportation Authority (LA Metro) VMT Mitigation Bank and other strategies outside of the mitigation bank.*

E. Management Approach



Kristine Cai
Director of Mobility, Central and Northern California

Role: Principal in Charge

Ms. Cai is a recognized expert in transportation strategy and planning, policy development, VMT strategy and mitigation, and travel demand forecasting. Ms. Cai served as the Deputy Director for the Fresno COG and was with the Fresno COG for 21 years before joining LSA. During her service in the public sector, Ms. Cai devoted much of her career to integrated transportation and land use planning work. She has extensive experience advancing innovative solutions that meet sustainability, efficiency, equity, and safety goals. Leading a team of professional engineers and planners, she implemented many projects and programs that advanced the sustainability in the Fresno region as well as in the San Joaquin Valley. As the Director of Mobility for Central and Northern California at LSA, Ms. Cai continues to serve the communities in the San Joaquin Valley as well as in the Northern California region. **Ms. Cai managed** the feasibility study of the Fresno County Regional VMT Mitigation Program, led the development of the Fresno County SB 743 implementation Regional Guidelines and three Regional Transportation Plans/Sustainable Community Strategies (RTP/SCSs) while at Fresno COG. She is currently assisting five San Joaquin Valley MPOs in the development of their 2026 RTP/SCS. Additionally, she serves as project advisor for Fresno COG's Managed Lanes Study, and she is leading a multi-million-dollar climate resiliency project for the eight MPOs in the San Joaquin Valley. The valley-wide project will develop truck models for the MPOs and conduct climate risk analysis for the goods movement network in the San Joaquin Valley.

E. Management Approach

Key Staff



Ravi Palakurthy, EIT
Senior Transportation Engineer
Role: Senior Travel Demand Modeler

Mr. Palakurthy is a Senior Transportation Engineer and Transportation Planner with more than 20 years of experience in travel model development, traffic simulation, and multimodal transportation planning. His professional experience includes travel demand model development, comprehensive plan preparations, land use modeling/forecasting, traffic impact studies, corridor studies, transportation fee programs, and air quality analysis. Mr. Palakurthy is skilled in many of the popular transportation software packages, geographic information system (GIS), and in various signal modeling programs. He is experienced in various travel demand software packages such as TransCAD, CUBE, VISUM, EMME/2, and QRS II. Mr. Palakurthy has extensive experience in estimation of travel models and the associated processing, review, and analysis of travel behavior survey data. He has used household travel diary surveys, on-board transit surveys, travel speed surveys, and other sources to estimate, update, and design regional and local travel models. **Mr. Palakurthy was the lead modeler for the development of the County of Fresno's SB 743 Implementation Regional Guidelines and County of Orange's and City of Long Beach's VMT thresholds.**



Simon Poon
Transportation Planner/Engineer
Role: Transportation Planner and Engineer

As a Transportation Planner/Engineer, Mr. Poon assists the mobility principals in conducting transportation impact analyses for small and large residential and commercial development projects, and specific plans for cities in southern and central California. He has also worked on VMT guidelines and mitigation projects. **Mr. Poon served as Transportation Planner/Engineer for project services related to the VMT Program for the City of Fresno and for the City of Hanford's VMT Analysis Thresholds and Implementation Guidelines.**

E. Management Approach



Aryanna Gomez
Assistant Transportation Planner/Engineer

Role: Assistant Transportation Planner and Engineer

As an Assistant Transportation Planner/Engineer, Ms. Gomez supports project managers through her proficiency in AutoCAD, ArcGIS Pro, and traffic analysis software such as Synchro and SimTraffic. She assists with traffic studies, technical report preparation, and spatial analysis, and contributes to traffic and parking impact evaluations to ensure accurate, comprehensive deliverables that align with client goals and municipal requirements. Her experience includes supporting multimodal and land use–related planning efforts across California. ***Ms. Gomez’s relevant experience includes contributing to the planning and design of a campus mobility hub, analyzing campus circulation and wayfinding and preparing site plans and visualizations using AutoCAD, SketchUp, and Twinmotion to support improved multimodal access. Ms. Gomez also collaborated with the City of Upland on a public park improvement initiative, developing mobility-focused recommendations informed by field review and community input.***



Kyle Simpson
Principal Environmental Planner

Role: Environmental Planner

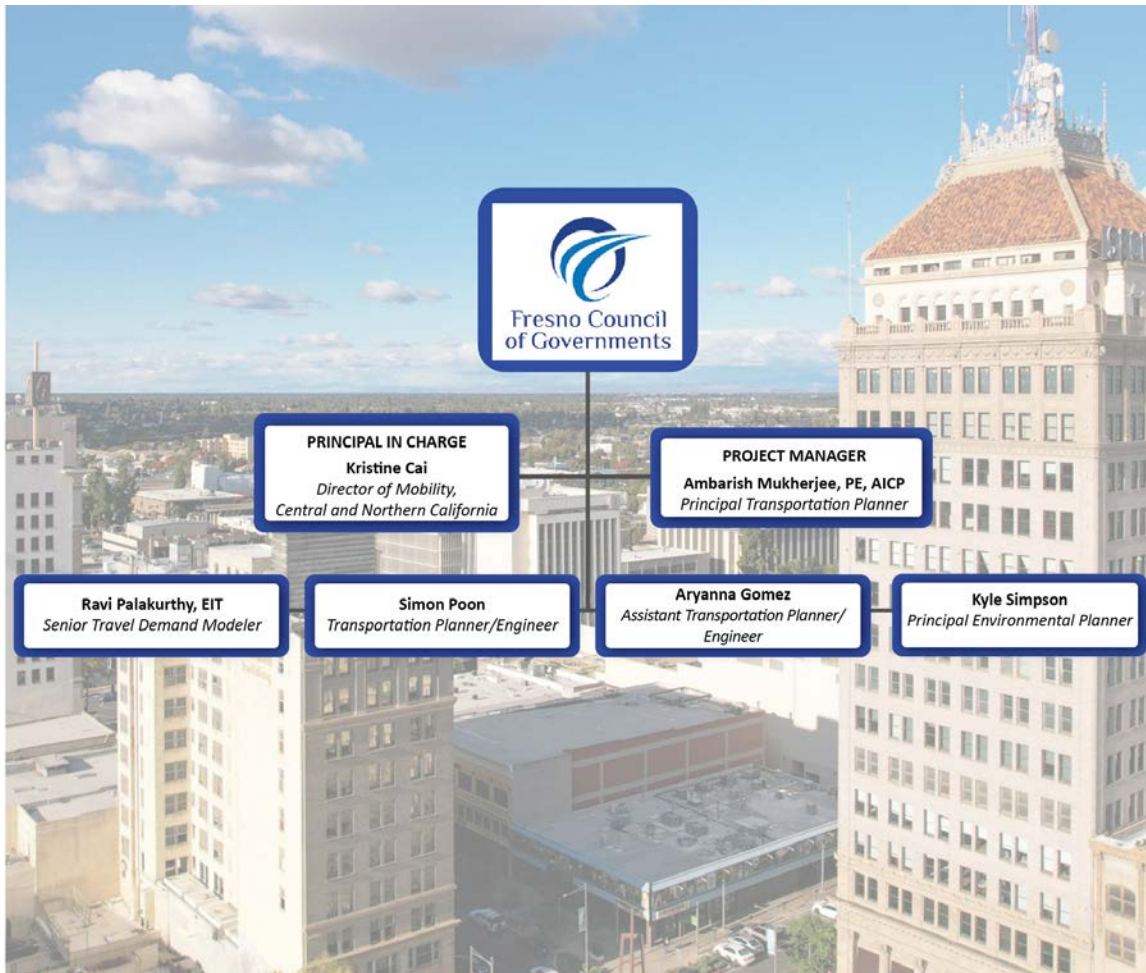
Mr. Simpson is a CEQA and NEPA practitioner and project manager with over 16 years of experience. He has served as project manager or key staff on over 70 projects in Northern California and the Central Valley. He has extensive experience with project-level analysis for mixed-use development, school facilities, public facilities, and open space/recreational facilities. His responsibilities at LSA include project management and preparation of CEQA/NEPA documents. ***Mr. Simpson’s relevant experience includes managing the preparation of an EIR for the City of Fresno VMT Reduction Program which was recently adopted in December 2025.***

E. Management Approach

Key Personnel Allocation of Hours by Task

Staff/Role	Task 0	Task 1	Task 2	Task 3	Task 4	Task 5	Task 6	Task 7	Task 8	Task 9
Kristine Cai <i>Principal in Charge</i>	30	6	8	8	10	16	16	4	4	12
Ambarish Mukherjee, PE, AICP <i>Project Manager</i>	36	6	12	8	24	32	40	30	16	16
Ravi Palakurthy, EIT <i>Senior Travel Demand Modeler</i>	30	6	24	4	40	32	60	32	16	4
Simon Poon <i>Transportation Planner/Engineer</i>	0	4	24	4	40	32	140	40	80	12
Aryanna Gomez <i>Assistant Transportation Planner/Engineer</i>	12	4	16	0	24	32	140	16	120	12
Kyle Simpson <i>Principal Environmental Planner</i>	0	0	2	0	0	0	0	0	0	0

Organizational Chart



F. Budget and Billing Format

LSA Proposal 20262764.P Fresno COG Fresno COG VMT Mitigation Program		LSA						Total LSA Hours	Total LSA Fees
		Principal in Charge (Kristine Cai)	Project Manager (Anbarish Mukherjee)	Senior Travel Demand Modeler (Ravi Palakurthy)	Transportation Planner (Simon Poon)	Aryanna Gomez (Assistant Transportation Planner)	Principal Environmental Planner (Kyle Simpson)		
3/24/2026									
Hourly Rate (\$/ hour)		\$93.71	\$100.12	\$81.32	\$48.76	\$37.04	\$83.79		
ICR: Overhead Rate		220.96%							
Profit		10.00%							
Multiplier		3.5306							
% in Year		Escalation							
		5%							
50%	Year 1	\$330.85	\$353.48	\$287.11	\$172.15	\$130.77	\$295.83		
50%	Year 2	\$347.39	\$371.15	\$301.46	\$180.76	\$137.31	\$310.62		
100%	Weighted Average	\$339.12	\$362.32	\$294.28	\$176.45	\$134.04	\$303.22		
Task 00 Project Management									
0.0	Project Management	30.00	36.00	30.00		12.00		108.00	\$33,653.98
Task 00 Project Management Subtotal		30.00	36.00	30.00	0.00	12.00	0.00	108.00	\$33,653.98
Task 01 Convene Stakeholder Committee (Local Agencies, Development Community, and Technical Consultants)									
1.0	Convene Stakeholder Committee (Local Agencies, Development Community, and Technical Consultants)	6.00	6.00	6.00	4.00	4.00		26.00	\$7,216.30
Task 01 Convene Stakeholder Committee (Local Agencies, Development Community, and Technical Consultants) Subtotal		6.00	6.00	6.00	4.00	4.00	0.00	26.00	\$7,216.30
Task 02 Review Phase I VMT Mitigation Program Study and Highlight Key Recommendations									
2.0	Review Phase I VMT Mitigation Program Study and Highlight Key Recommendations	8.00	12.00	24.00	24.00	16.00	2.00	86.00	\$21,109.54
Task 02 Review Phase I VMT Mitigation Program Study and Highlight Key Recommendations Subtotal		8.00	12.00	24.00	24.00	16.00	2.00	86.00	\$21,109.54
Task 03 Organize Agency Practitioner Panel on VMT Mitigation Program Experience and Best Practices									
3.0	Organize Agency Practitioner Panel on VMT Mitigation Program Experience and Best Practices	8.00	8.00	4.00	4.00			24.00	\$7,494.44
Task 03 Organize Agency Practitioner Panel on VMT Mitigation Program Experience and Best Practices Subtotal		8.00	8.00	4.00	4.00	0.00	0.00	24.00	\$7,494.44
Task 04 Evaluate Regional VMT Mitigation Program Options and Assess Feasibility for the Fresno Region (Including Additionality and Equity Considerations)									
4.0	Evaluate Regional VMT Mitigation Program Options and Assess Feasibility for the Fresno Region (Including Additionality and Equity Considerations)	10.00	24.00	40.00	40.00	24.00		138.00	\$34,133.25
Task 04 Evaluate Regional VMT Mitigation Program Options and Assess Feasibility for the Fresno Region (Including Additionality and Equity Considerations) Subtotal		10.00	24.00	40.00	40.00	24.00	0.00	138.00	\$34,133.25
Task 05 Develop Implementation Framework for a Regional VMT Mitigation Program in the Fresno Region (Agency Structure, CEQA, Legal, Nexus, and Bank Integration)									
5.0	Develop Implementation Framework for a Regional VMT Mitigation Program in the Fresno Region (Agency Structure, CEQA, Legal, Nexus, and Bank Integration)	16.00	32.00	32.00	32.00	32.00		144.00	\$36,372.94
Task 05 Develop Implementation Framework for a Regional VMT Mitigation Program in the Fresno Region (Agency Structure, CEQA, Legal, Nexus, and Bank Integration) Subtotal		16.00	32.00	32.00	32.00	32.00	0.00	144.00	\$36,372.94
Task 06 Coordinate with Fresno COG and Stakeholders to Define Mitigation Measures, Develop Cost Estimates, and Quantify VMT Reductions									
6.0	Coordinate with Fresno COG and Stakeholders to Define Mitigation Measures, Develop Cost Estimates, and Quantify VMT Reductions	16.00	40.00	60.00	140.00	140.00		396.00	\$81,044.87
Task 06 Coordinate with Fresno COG and Stakeholders to Define Mitigation Measures, Develop Cost Estimates, and Quantify VMT Reductions Subtotal		16.00	40.00	60.00	140.00	140.00	0.00	396.00	\$81,044.87
Task 07 Establish Monitoring, Data Collection, and Verification Protocols for VMT Reductions and Provide On-Call Implementation Support									
7.0	Establish Monitoring, Data Collection, and Verification Protocols for VMT Reductions and Provide On-Call Implementation Support	4.00	30.00	32.00	40.00	16.00		122.00	\$30,845.84
Task 07 Establish Monitoring, Data Collection, and Verification Protocols for VMT Reductions and Provide On-Call Implementation Support Subtotal		4.00	30.00	32.00	40.00	16.00	0.00	122.00	\$30,845.84
Task 08 Prepare and Circulate Draft Report for Public Review									
8.0	Prepare and Circulate Draft Report for Public Review	4.00	16.00	16.00	80.00	120.00		236.00	\$42,063.33
Task 08 Prepare and Circulate Draft Report for Public Review Subtotal		4.00	16.00	16.00	80.00	120.00	0.00	236.00	\$42,063.33
Task 09 Present Final Report to Fresno COG Committees and Policy Board for Acceptance									
9.0	Present Final Report to Fresno COG Committees and Policy Board for Acceptance	12.00	16.00	4.00	12.00	12.00		56.00	\$14,769.58
Task 09 Present Final Report to Fresno COG Committees and Policy Board for Acceptance Subtotal		12.00	16.00	4.00	12.00	12.00	0.00	56.00	\$14,769.58
Subtotal Labor:		114.00	220.00	248.00	376.00	376.00	2.00	1,336.00	\$308,704.07
Reimbursable Expenses									
Lodging/Meals									\$520.00
Mileage									\$700.00
Subtotal Reimbursable Expenses									\$1,220.00
								Total	\$309,924.07



G. Insurance Requirements

LSA complies with the insurance requirements list in the RFP and will maintain the insurance policies throughout the term of the contract.

H. Disadvantaged Business Certifications

Per Q&A, all Disadvantaged Business Enterprise (DBE) requirements are currently suspended, and we have not provided any DBE-related information.

I. Conflicts of Interest

LSA does not have any financial, business, or other relationship with the Fresno COG that may have an outcome on the selection.



J. Firm Qualifications

LSA Firm Background

LSA is a diversified transportation, environmental, and community planning firm with 50 years of experience helping public- and private-sector clients navigate the often-complex process of transportation, land use, and environmental planning issues. Founded in 1976, LSA has nine offices in California, including Clovis, Carlsbad, Emeryville, Irvine (Headquarters), Los Angeles, Palm Springs, Riverside, Roseville, and San Luis Obispo, with a total staff of approximately 180 full-time employees capable of fulfilling any project assignment, large or small.

The LSA Team is local to the San Joaquin Valley, with LSA’s Clovis office spearheading the effort for this project. The LSA Team has legacy knowledge of the local political, planning, transportation, and environmental landscapes of the San Joaquin Valley, having completed projects for local communities throughout the San Joaquin Valley. We have managed and successfully completed projects for multiple jurisdictions, including the Fresno COG, the City of Fresno, the City of Madera, the County of Madera, the Madera County Transportation Commission, MCAG, the City of Hanford, the City of Lemoore, and the City of Visalia. Our Principal in Charge, Ms. Cai, has led many multimodal projects in Fresno County during her 21-year tenure with the Fresno COG. She has extensive experience working with the federal, State, and local governments, transit agencies, and other stakeholders, including interest groups, community organizations, and the general public in the San Joaquin Valley.



J. Firm Qualifications

Transportation Planning



LSA offers comprehensive transportation planning and engineering services supporting all aspects of transportation projects, with particular expertise in evaluating and mitigating transportation impacts under SB 743 using VMT as the primary metric. LSA's services include regional transportation modeling, traffic impact and parking analyses, identification of roadway funding and cost-sharing opportunities, travel demand forecasting, corridor and circulation planning, transportation demand management strategies, and preparation of nexus studies and fee programs. Our team routinely integrates transportation engineering with land use, economic, market, and population analyses to develop transparent, defensible methodologies for estimating travel demand, particularly in cases where standard trip-generation data may not apply, such as specialized public or institutional facilities.

LSA is recognized as one of California's leading firms in implementing SB 743 and evaluating transportation impacts under CEQA. Our transportation planners, engineers, and CEQA practitioners maintain extensive familiarity with the California Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA and the evolving methodologies related to thresholds, safety considerations, and mitigation strategies. LSA has conducted VMT analyses and developed mitigation strategies for a wide range of projects statewide, including General Plans, Specific Plans, land development projects, and transportation infrastructure projects.

LSA has particularly deep experience in the Central Valley and extensive familiarity with the planning and regulatory framework within the jurisdiction of the Fresno COG. LSA led the development of the Fresno COG SB 743 Regional Implementation Guidelines and the subsequent update, a foundational resource supporting consistent VMT analysis across jurisdictions within the region. As part of that effort, LSA used the Fresno COG ABM to develop jurisdiction-level, location-based screening maps that help streamline project-level VMT analysis and provide clarity regarding screening thresholds and potential mitigation requirements. LSA also prepared the VMT guidelines for the City of Fresno, adopted in June 2020. These guidelines established a comprehensive framework for evaluating VMT impacts and identified a suite of potential VMT reduction strategies tailored to Fresno's socioeconomic and geographic characteristics. LSA coordinated closely with regional stakeholders, including the Fresno Area Express transit provider, to understand ongoing multimodal initiatives and identify measures that could contribute to regional VMT mitigation strategies.

LSA helped the City of Fresno establish the VMT Reduction Program, which reduces VMT and associated greenhouse gas emissions, while streamlining the environmental compliance process for development projects that generate vehicle trips.

LSA regularly applies the Fresno COG ABM and the California Statewide Travel Demand Model (CSTDm) to support project-level and regional transportation analyses. Our transportation team combines strong technical expertise with a collaborative, solution-oriented approach that is sensitive to local community context. **This experience positions LSA to effectively support Fresno COG in advancing regional strategies to reduce VMT, implement SB 743 requirements, and develop practical, implementable mitigation programs.**

LSA Project Experience

The following selection of projects provides a brief description of the LSA Team's applicable VMT project experience.

City of Fresno, Project Services Related to a VMT Program and Related Environmental Analysis, Fresno, California

The project involves providing consulting and support services for project services related to a VMT mitigation program and related environmental analysis.

LSA prepared the City of Fresno's VMT guidelines, adopted in June 2020. The guidelines included an array of VMT reduction measures that are potentially applicable to the City. Subsequently, LSA was hired to prepare a citywide VMT mitigation program. As part of that program, mitigation measures have been identified based on the City's socioeconomic and geographic characteristics as well as the feasibility of implementation of those mitigation measures. As part of this effort, LSA has been on conversations between the City and the Fresno Area Express transit provider and learned of many initiatives for multi-modalism that may satisfy regional VMT mitigation definitions and strategies. This project was a continuation of the previous analysis and invested in greater detail the applicability of these mitigation measures as a VMT Mitigation Fee Program. This program is being supported by a Nexus Study that establishes a VMT impact fee pursuant to the Mitigation Fee Act (Government Code 66000 et. seq.).

LSA helped the City of Fresno establish the VMT Reduction Program. The VMT Reduction Program includes two major components that can be applied individually or in combination: an Urban Design Calculator (UDC), which estimates the impact of incorporating various design elements to reduce VMT; and a mitigation fee that would be used to fund VMT-reducing projects throughout Fresno. This fee program would operate similar to a VMT mitigation bank. However, to provide additional CEQA support to the fee program, LSA is also preparing an EIR for the VMT mitigation program. Kyle Simpson, who is also part of this project team, is preparing the EIR.

Fresno COG, SB 743 Regional Implementation Guidelines, Fresno, California

LSA's Project Manager, Mr. Mukherjee, led the development of the Fresno COG SB 743 Regional Implementation Guidelines. LSA used the Fresno COG ABM to develop jurisdiction-level, location-based screening maps. LSA also prepared the VMT analysis guidelines for the Fresno COG member jurisdictions, wherein it addressed several policy-related issues that have been raised in the OPR Technical Advisory related to SB 743 legislation. These issues include definition of the region, criteria from the baseline condition to consider for each jurisdiction, streamlining of small projects, high-quality transit corridors and transit-oriented development zones, and VMT mitigation measures. Additionally, Mr. Mukherjee led LSA staff in the preparation of a web-based VMT screening tool and a VMT calculator tool for the Fresno COG jurisdictions. Further, LSA provided Fresno COG with training, support, and a user guide for the VMT calculation tool.



J. Firm Qualifications

Fresno COG, VMT Guidelines Update, Fresno, California

LSA supported Fresno COG in updating its SB 743 VMT evaluation guidelines following enhancements to the regional ABM. The model update incorporated several refinements, including implementation of the latest version of DaySim, integration of taxi and TNC travel modes, a telecommuting model, updated external auto and truck trip tables using Replica big data, and new modeling capabilities for high-occupancy vehicle (HOV) and high-occupancy toll (HOT) lanes. These improvements required updates to the regional VMT evaluation framework to maintain consistency between the model and CEQA transportation impact analysis.

LSA led development of the updated technical methodology used to estimate regional VMT efficiency metrics. The guidelines retained the region's VMT per capita and VMT per employee metrics and introduced a new origin-destination VMT per service population metric for evaluating land use projects. A key component of the effort involved refining the IX and XI VMT components using Replica observed travel data. LSA processed origin-destination trip data and integrated it with internally modeled travel from DaySim to estimate VMT at the traffic analysis zone level. The updated methodology captures full trip lengths and reflects observed travel patterns.

The updated guidelines provide Fresno COG member jurisdictions with a consistent framework for evaluating transportation impacts, applying VMT screening thresholds, and identifying feasible mitigation strategies under SB 743.

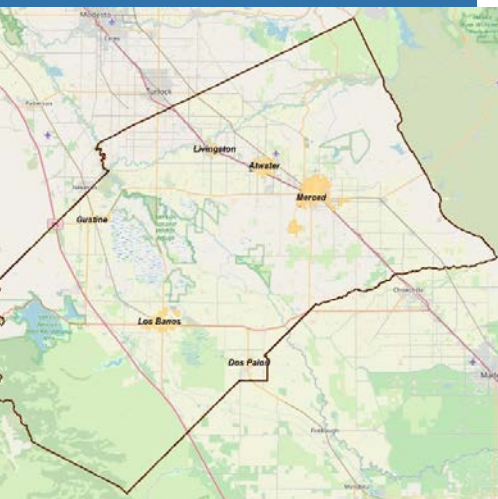
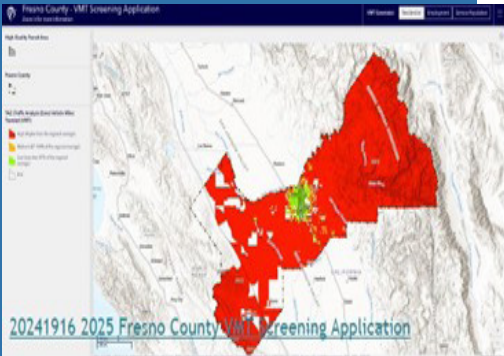
Merced County Association of Governments, MCAG SB 743 Implementation Plan, Merced County, California

The project involved the SB 743 Implementation Plan specific to the local jurisdictions including the County of Merced and the six cities in Merced County: Atwater, Dos Palos, Gustine, Livingston, Los Banos, and Merced.

The purpose of this project was to assist the County and cities in implementing SB 743 and transitioning to the use of VMT as the primary metric for evaluating transportation impacts under the CEQA. The project included identifying and establishing the methodology for estimating project-specific VMT, regional/local thresholds, and mitigation strategies. Documentation of these data, travel demand models, tools, and strategies provided local agencies with substantial evidence for future CEQA analyses.

The plan will ultimately develop a direct path for MCAG and its member agencies to implement VMT analysis and threshold setting through travel demand modeling efforts, project review, and future planning efforts such as the General Plan and Regional Transportation Plan.

Mr. Mukherjee guided LSA to analyze potential mitigation measures for each jurisdiction that would be appropriate for implementation in the local jurisdictions. The mitigation measures were applicable to common projects in each jurisdiction and considered a range of project types, sizes, and locations. LSA identified methodologies to quantify VMT reductions associated with each mitigation measure based on substantial evidence appropriate for CEQA review.



City of Visalia, VMT Thresholds and Implementation Guidelines, Tulare County, California

LSA assisted the City of Visalia with establishing VMT thresholds for subsequent CEQA documentation. LSA prepared the City's VMT analysis guidelines, where it addressed several policy-related issues that have been raised by the OPR Technical Advisory related to SB 743 legislation. The policy document also evaluated how adoption of these new thresholds and guidelines help facilitate the City's General Plan Policies. LSA also created an online VMT Screening Tool for the City. The City's Traffic Impact Analysis Guidelines were also updated to incorporate VMT analysis methodology, screening criteria, and significant impact criteria. LSA used the Tulare County Association of Governments (TCAG) travel model for this project, and LSA also prepared a script that would help the TCAG's modeling team calculate VMT from the model outputs.

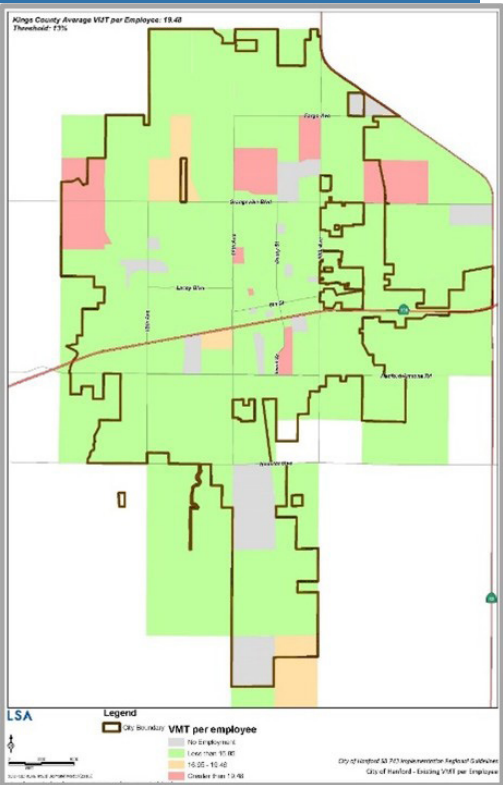


City of Hanford, VMT Analysis Thresholds and Implementation Guidelines, Hanford, California

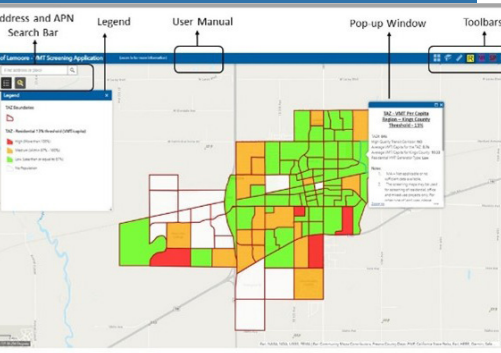
LSA provided VMT Thresholds and Implementation Guidelines for adoption by the City of Hanford pursuant to SB 743 for the purpose of evaluating traffic/greenhouse gas (GHG) impacts in compliance with the requirements of CEQA and the State CEQA Guidelines.

Because the Kings County Association of Governments' (KCAG) travel demand model (TDM) is a trip-based model, a trip-based approach was followed. LSA used the KCAG TDM to examine the trips into and out of Hanford. As such, consistent with the OPR Technical Advisory, only trips having origins or destinations or both within Hanford were considered. External pass-through trips were not considered.

LSA defined the "region" for VMT analysis and defined methodology for determining VMT. The firm developed thresholds of significance that are relevant and appropriate to the City of Hanford and proposed development projects. LSA also developed a strategy and/or feasible menu of Mitigation Measures applicable to City needs in facilitating reduction of VMT and related GHG emissions of non-motorized transportation facilities for increased connectivity via walking and bicycling, transit operations, and key civic and public services. LSA developed guidance and a process that project applicants will be required to follow in preparing project-level VMT analyses for required CEQA documentation.

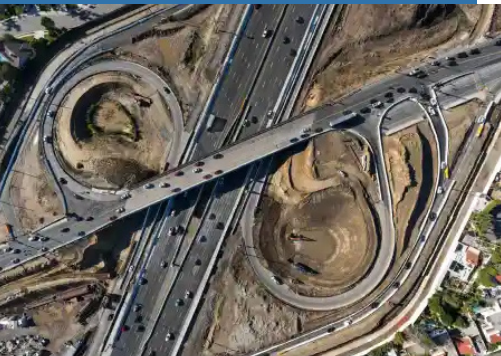


J. Firm Qualifications



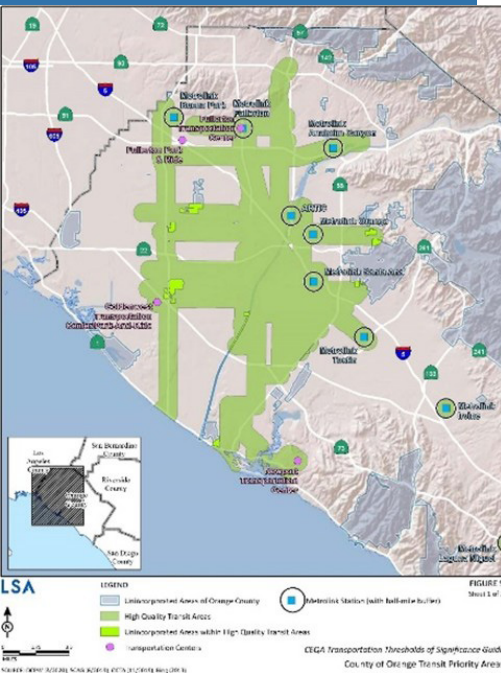
City of Lemoore, VMT Thresholds and Implementation Guidelines, Lemoore, California

LSA assisted the City of Lemoore with meeting the VMT criteria. The City of Lemoore is making a shift to adopt a set of VMT thresholds to address the changes to CEQA transportation analysis included in SB 743 and shift from a delay-based LOS analysis to VMT. LSA defined the appropriate “region” for VMT analysis and standardized screening methods for VMT threshold compliance. The firm made recommendations for appropriate VMT thresholds for both land use and transportation projects and tailored plans to the City of Lemoore.



Los Angeles County Metropolitan Transportation Authority, I-405 Express Lanes, Los Angeles County, California

LSA is preparing the VMT Mitigation Study for the project, which intends to convert existing HOV lanes on I-405 within the Sepulveda Pass area to HOT lanes (i.e., Express Lanes). The study evaluates the project’s consistency with SB 743 by assessing potential changes in regional and corridor-level VMT under build and no-build conditions, with a focus on demand management, pricing effects, and mode shift.



County of Orange, VMT Guidelines, Orange County, California

OC Public Works contracted with LSA to update the County of Orange’s Traffic Analysis Guidelines and CEQA thresholds for transportation to reflect the requirements of SB 743. These updates changed the metric of significant impact from delay and congestion to VMT, a surrogate for GHG emissions, which are a primary contributor to climate change. Mr. Mukherjee served as the lead technical VMT advisor on this project. LSA conducted regular meetings with key County staff to present policy and technical elements related to SB 743 and VMT calculation. With each meeting, LSA drafted an issue paper that provided the County with easy to comprehend direction on addressing new CEQA requirements and substantial evidence to support the County’s direction. These issue papers were reviewed and approved by the County and rolled up into the SB 743 VMT Implementation Guide. Based on this guide, the traffic analysis guidelines were revised. The County is now compliant with the requirements of SB 743 and has documentation that environmental document preparers can refer to for instruction. Furthermore, LSA prepared VMT Screening and VMT Calculator computerized tools to aid in the determination of significant transportation impacts. These tools are consistent with forecasting approaches in the Orange County Traffic Analysis Model Version 5 regional traffic forecasting platform.



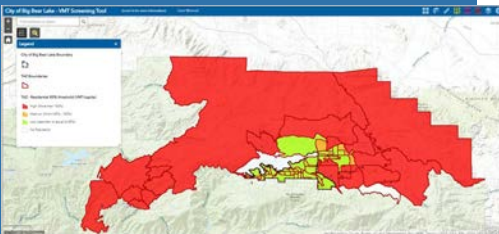
City of Long Beach, VMT Guidelines, Long Beach, California

Following successful completion of the traffic impact analysis, including VMT analysis, of the proposed Long Beach General Plan Land Use Element, the City of Long Beach selected LSA to guide it through implementation of SB 743. LSA was tasked with developing VMT thresholds and screening criteria, defining “region” for the purposes of project comparison, identifying high-quality transit corridors, identifying screening criteria appropriate for the City, and preparing a list of possible VMT mitigation measures. LSA recently completed the draft VMT analysis guidelines for the City, which addressed all these tasks.



City of Newport Beach, VMT Thresholds, Newport Beach, California

LSA helped the City of Newport Beach to create a policy document for integration of SB 743 changes to CEQA. The policy document addressed determination of the regional boundaries, calculation of regional average rates, and establishment of project screening criteria that incorporated a local traffic ordinance, establishment of an analysis methodology and thresholds, and potential mitigation strategies. As part of this effort, LSA created land use project screening maps showing transit priority areas within Newport Beach.



City of Big Bear, VMT CEQA Thresholds, Big Bear, California

LSA recently assisted the City of Big Bear Lake in implementing SB 743 and transitioning its transportation impact analysis framework from level of service (LOS) to VMT under CEQA. Due to the City’s unique geographic and travel characteristics, achieving the typical 15 percent VMT reduction target was not feasible. LSA worked with the City to develop an alternative, locally appropriate approach for evaluating transportation impacts.

The team established a defensible baseline condition and developed methodologies and quantified thresholds to determine levels of significance for land use and transportation projects. This work provided the City with a clear framework for analyzing project-related VMT and determining whether transportation impacts would be considered significant under CEQA.

As part of this effort, LSA developed technical procedures and analytical tools to support implementation of the new methodology. Deliverables included updated Transportation Impact Analysis Guidelines and a web-based VMT Screening Tool designed to streamline CEQA transportation impact analysis for future development projects. The work provides the City with a practical and defensible framework for evaluating transportation impacts while addressing the constraints associated with implementing SB 743 in a mountain resort community.

J. Firm Qualifications



City of Banning, Traffic Fee Program Update, VMT Guidelines and Thresholds, Banning, California

LSA, under contract with the City of Banning, prepared an EIR for a General Plan Amendment that included change in LOS policy and removal of the Highland Home Road/I-10 interchange. LSA analyzed the traffic impacts associated with the two changes in the current General Plan. For the LOS policy change traffic analysis, LSA analyzed intersections and recommended mitigation measures for both LOS C (current policy) and LOS D (proposed policy). LSA also developed conceptual drawings that showed the right-of-way impacts for both LOS C and LOS D. For the interchange removal traffic analysis, LSA analyzed impacts associated with three scenarios: with interchange, without interchange, and with overcrossing. LSA identified improvements required to mitigate intersections for all the scenarios. Based on a comparison of mitigation measures required to satisfy the City of Banning’s LOS policy, the scenario with fewest impacts (mitigation measures) was recommended as a preferred option.

Additionally, LSA assisted in the development of localized guidelines, VMT thresholds, and VMT mitigation options to comply with SB 743. The City of Banning faces significant challenges related to the implementation of SB 743 requirements. The overarching issue is that all Western Riverside County Organization of Governments subregion cities previously used LOS-based thresholds in their traffic study guidelines and in their General Plans and thereby lacked VMT based thresholds and other related technical resources needed for use in an SB 743 analysis. In addition, few projects have performed any kind of rigorous VMT-based analysis, and there is limited VMT information available outside of data at the jurisdictional level. The types of projects SB 743 aims to promote cannot be approved based on their current transportation impact methodology. Finally, there have been no specific studies on the effectiveness of potential VMT mitigation strategies in Western Riverside County.

K. Signing of Proposal/Authorization to Negotiate

LSA's proposal has been signed by Chief Executive Officer Amy Fischer and is a firm offer that will remain valid for 90 days. Individuals with authority to negotiate and contractually bind the company are listed below:

Amy Fischer

Chief Executive Officer
2565 Alluvial Avenue, Suite 172
Clovis, CA 93611
T: (559) 490-1210

Wes Speake

President/Chief Operating Officer
1500 Iowa Avenue, Suite 200
Riverside, CA 92507
T: (951) 781-9310

JT Stephens

Executive Vice President
6001 Shellmound Street, Suite 425
Emeryville, CA 94608
T: (510) 236-6810

Justin Cary

Chief Financial Officer
3210 El Camino Real, Suite 100
Irvine, CA 92602
T: (949) 553-0666



Appendix A - Resumes



EXPERTISE

- Traffic Impact Studies
- Pedestrian and Bicycle Planning
- Transit Routing
- Goods Movement
- Transportation Funds and Grants Management

EDUCATION

Master of City and Regional Planning with concentration in Transportation and Land Use Planning, and GIS, University of Texas at Arlington, Texas, 2005

Bachelor of Architecture (Honors), Indian Institute of Technology, Kharagpur, India, 2003

PROFESSIONAL EXPERIENCE

Principal Transportation Planner, LSA, Riverside, California, 2006–Present

Service Planner I, Fort Worth Transportation Authority, Fort Worth, Texas, 2005

PROFESSIONAL CERTIFICATIONS / REGISTRATIONS

Professional Engineer (California C88084)

American Institute of Certified Planners (AICP): Membership Number 023158

PROFESSIONAL RESPONSIBILITIES

As a Principal Transportation Planner at LSA’s Riverside office, Mr. Mukherjee specializes in travel demand modeling and public infrastructure projects and conducts Traffic Impact Analyses for a wide variety of large and small projects including transit projects, residential development, mixed-use development, commercial and office projects, parking structures, roadway and circulation improvements, and General Plans and Specific Plans. He is currently in charge of LSA’s Transportation group. Prior to joining LSA, he worked with the Fort Worth Transportation Authority as a Transit Planner.

PROJECT EXPERIENCE

Fresno Council of Governments, Vehicle Miles Traveled Threshold Study Fresno, California

Mr. Mukherjee is the Project Manager for this project. LSA was approved to provide Fresno Council of Governments (Fresno COG) with services to establish VMT thresholds for subsequent CEQA documentation for the 16 member jurisdictions within Fresno COG. LSA is working with the Fresno COG activity-based model to provide an updated existing land use base (existing conditions reflect the base conditions for new CEQA conformity). LSA will be addressing several policy-related issues that have been raised by the State Office of Planning and Research in its recent Technical Advisory related to SB 743 legislation. These issues include definition of the region to evaluate VMT, criteria from the baseline condition to consider, a model screening application for streamlining projects, high-quality transit corridors and transit-oriented development zones, and more. LSA is preparing a model user interface for ease of use that is a GIS-based screening tool with countywide mapping. LSA will also provide the Fresno COG and its member agencies with training, support, and a user guide.

City of Fresno, General Plan Fresno, California

Mr. Mukherjee was the task manager for preparation of the traffic and circulation study for this project. LSA has been awarded the contract to prepare the updated City of Fresno General Plan EIR and traffic analysis. The traffic analysis will be conducted to address general traffic flow, arterial hierarchy, and land use and circulation consistency. Through the use of daily and peak-hour roadway segment values, adequate capacity will be demonstrated for study area roadways in Fresno and the surrounding area. In addition, the General Plan Land Use Element will be analyzed using VMT as a metric. LSA is currently revising modules of the Fresno traffic-forecasting tool to reflect an updated existing condition (VMT is a comparison of post-project to existing conditions). Traffic Analysis Zone (TAZ) VMT forecasts are being compiled, and low, moderate, and high VMT zones are being identified. A regional average is being established, and the final General Plan project will be compared to that regional average to determine the net change in VMT as a result of General Plan implementation.

**Merced County Association of Governments, MCAG SB 743 Implementation Plan
Merced County, California**

The project involved the SB 743 Implementation Plan specific to the local jurisdictions including Merced County and the six cities in Merced County: Atwater, Dos Palos, Gustine, Livingston, Los Banos, and Merced. Mr. Mukherjee guided LSA to analyze potential mitigation measures for each jurisdiction that would be appropriate for implementation in the local jurisdictions. The mitigation measures were applicable to common projects in each jurisdiction and considered a range of project types, sizes, and locations. LSA identified methodologies to quantify VMT reductions associated with each mitigation measure based on substantial evidence appropriate for CEQA review.

**City of Visalia, VMT Thresholds and Subsequent Update
Visalia, California**

Mr. Mukherjee served as Project Manager for establishing VMT thresholds for subsequent CEQA documentation. LSA prepared the City's VMT analysis guidelines, which addressed several policy-related issues that have been raised by the State Office of Planning and Research in the Technical Advisory related to SB 743 legislation. These issues include definition of the region to evaluate criteria from the baseline condition to consider for each jurisdiction, streamlining and small projects, high-quality transit corridors and transit-oriented development zones, and VMT mitigation measures. The policy document also evaluated how adoption of these new thresholds and guidelines would help facilitate the City of Visalia's General Plan policies. LSA also created an online VMT Screening Tool for the City. The City's Traffic Impact Analysis Guidelines were also updated, incorporating VMT analysis methodology, screening criteria, and significant impact criteria.

**Los Angeles County Metropolitan Transportation Authority, I-405 Express Lanes
Los Angeles County, California**

Mr. Mukherjee is serving as Project Manager for the preparation of the VMT Mitigation Study for the project, which intends to convert existing high-occupancy vehicle lanes on I-405 within the Sepulveda Pass area to high-occupancy toll lanes (i.e., ExpressLanes).

**City of Long Beach, Globemaster Corridor Specific Plan Vehicle Miles Traveled (VMT) Analysis
Long Beach, Los Angeles County, California**

Mr. Mukherjee was the project manager in charge of preparing a VMT analysis for the Globemaster Corridor Specific Plan (GCSP) Project in Long Beach. The GCSP provides the planning and regulatory framework for guiding future development and attracting quality jobs to the approximately 432.12-acre GCSP area located adjacent to the Long Beach Airport, I-405, and the surrounding residential and business community. The regional (City) VMT per capita for both the base (2012) and future (2040) model scenarios were obtained from the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) model runs. The existing (2019) VMT per capita was developed by interpolating between base and future year VMT data obtained from the SCAG RTP model. Project select zone model runs were utilized to develop the project VMT. The project VMT per capita was calculated for both base (2012) and future (2040) model scenarios. The existing (2018) project VMT per capita was developed by interpolating between the base and future year VMT per capita for the project.

**City of Laguna Niguel, Laguna Niguel Town Center Modeling and VMT Analysis
Laguna Niguel, California**

Mr. Mukherjee was the project manager for this project and prepared a VMT analysis using the Orange County Traffic Analysis Model (OCTAM) for a mixed-use development that consists of 275 multifamily dwelling units, 54,410 square feet of office use, and 79,920 square feet of retail uses. Three separate select zone runs were created to separate out the VMT for the three different land uses. As part of this analysis, the project was compared to the regional VMT obtained from OCTAM.



EXPERTISE

- Transportation Strategy and Planning
- Sustainable Communities Strategy
- Project Management
- VMT Mitigation
- SB 743 Implementation
- Travel Demand Forecasting
- Talent Training and Development
- Policy Development
- Process Improvement
- Grant Management
- Team Leadership
- Presentations and Reporting

EDUCATION

M.S., Regional and Community Planning, Kansas State University, 1999

PROFESSIONAL EXPERIENCE

Director of Mobility, Central and Northern California, LSA, 2023–Present

Deputy Director, Fresno Council of Governments, 2019–2023

Other Roles, Fresno Council of Governments, 2002–2019

Regional Planner, San Joaquin Council of Governments, 1999–2001

PROFESSIONAL RESPONSIBILITIES

Ms. Cai is a recognized expert in transportation strategy and planning, policy development, VMT strategy and mitigation, and travel demand forecasting. Ms. Cai served as the Deputy Director for the Fresno Council of Governments (Fresno COG) and was with Fresno COG for 21 years before joining LSA. During her service in the public sector, Ms. Cai devoted much of her career to integrated transportation and land use planning work. She has extensive experience advancing innovative solutions that meet sustainability, efficiency, equity, and safety goals. Leading a team of professional engineers and planners, she implemented many projects and programs that advanced sustainability in the Fresno region as well as in the San Joaquin Valley. As the Director of Mobility for Central and Northern California at LSA, Ms. Cai continues to serve the communities in the San Joaquin Valley, as well as throughout California.

Some highlights of Ms. Cai’s career to date:

- Ms. Cai led the development of three Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCSs) while at Fresno COG. She is assisting five San Joaquin Valley Metropolitan Planning Organizations (MPOs) in the development of their 2026 RTP/SCSs.
- Ms. Cai has collaborated with multiple key stakeholders, including local governments, development communities, residents, and social justice groups, to direct development of the Fresno County SB 743 Implementation Guidelines and VMT Mitigation Program.
- Ms. Cai is leading a multi-million-dollar climate resiliency/goods movement project for the eight MPOs in the San Joaquin Valley. This project will develop truck models for the eight MPOs and conduct climate risk analysis for the goods movement network in the San Joaquin Valley.
- Ms. Cai raised \$1.5 million from the California Department of Housing and Community Development’s Regional Early Action Planning Grants Program, Caltrans’ Sustainable Communities Planning Grant Program, and other fundraising sources and drove the eight-county San Joaquin Valley Household Travel Survey as its Project Manager.

PROJECT EXPERIENCE

Fresno Council of Governments, Development of the Fresno County SB 743 Implementation Regional Guidelines Fresno, California

Ms. Cai led a consultant team and stakeholder group and developed a well-received regional implementation guideline that provides local governments and development communities with recommended thresholds, tools, and policies to implement SB 743. The technical team at Fresno COG has been providing VMT analysis service to traffic engineering consultants and development communities for their traffic impact studies.

**Fresno Council of Governments, Regional VMT Mitigation Program Study (Transportation)
Fresno, California**

Ms. Cai managed the feasibility study of a Regional VMT Mitigation Program, which was the first phase of the VMT mitigation study at Fresno COG. The study compared various VMT mitigation techniques; addressed issues such as cost effectiveness, additionality, proportionality, perpetuity, and equity; and explored innovative measures (e.g., affordable housing as a VMT mitigation measure). This Phase I study established the framework of a Regional VMT Mitigation Program and makes recommendations on potential program implementation structure.

**Fresno Council of Governments, Activity-Based Model Update
Fresno, California**

Ms. Cai led the development of the activity-based model (ABM) at Fresno COG to meet the requirements of air quality conformity, SCS development, and other planning activities and to address issues in interregional trip, transit, and active transportation forecasting. The Fresno COG ABM was the first in the San Joaquin Valley. It is fine-grained and sensitive to many policy issues that are in the San Joaquin Valley MPOs' purview. The Fresno COG ABM has continued to be improved and applied in the planning/CEQA activities throughout the region.

**Fresno Council of Governments, 2022, 2018, and 2014 Regional Transportation Plan/Sustainable
Communities Strategy Development
Fresno, California**

Ms. Cai managed the 2022, 2018, and 2014 RTP/SCS development process at Fresno COG and worked with federal, State, and local partners; community groups; and the public to ensure a successful collaboration process. The three plans were unanimously approved by the Fresno COG Policy Board and received CARB's approval unchallenged.

**Fresno County Mobility Hub Feasibility Study
Fresno County, California**

Ms. Cai served as a project advisor for the Fresno County Mobility Hub study. The study focused on exploring mobility hubs and identifying key opportunities for and challenges to develop and operate them. The study produced the concepts for the four selected focus sites: Clovis, Fresno, Parlier, and San Joaquin. This process demonstrated that each of the four sites has a credible path to enabling better mobility by supporting new or modified transportation options and linking together two or more modes of transportation. The mobility hubs will, if implemented, expand local and regional travel choices and provide people with better access to destinations. The study included a robust public outreach, with an emphasis on underserved communities within Fresno County.

**Merced County Association of Governments, 2026 Sustainable Communities Strategy Development
Merced, California**

Ms. Cai is leading the development of MCAG's 2026 SCS. Through a robust public process that includes stakeholder interviews, public workshops, digital surveys, and committee meetings, three SCS scenarios are created, and a final preferred SCS scenario will be selected by the MCAG Governing Board. The LSA team is developing a lands use model for MCAG's 2026 SCS process; SCS land use and transportation strategies will be created; and the three SCS scenarios will be run through the traffic model and the EMFAC model to produce performance indicator results. The LSA team is also assisting MCAG in developing the technical memorandum for their 2026 SCS.

**Madera County Transportation Commission, 2026 Sustainable Communities Strategy Development
Madera, California**

Ms. Cai manages the MCTC's 2026 SCS development project. The LSA team will develop SCS scenarios through a robust outreach process that includes digital online surveys, in-person and online workshops, stakeholder interviews, and a committee process. A land use model was created for the project.



EXPERTISE

- Transportation Planning
- Transportation Demand Modeling
- Traffic Operations Analysis

EDUCATION

University of Louisiana,
Lafayette, M.S., Civil
Engineering (Transportation),
2002

PROFESSIONAL EXPERIENCE

Senior Transportation
Planner/Engineer, LSA, Fort
Collins, Colorado, 2004–
Present

Transportation Planner,
Capital Region Planning
Commission, Baton Rouge,
Louisiana 2002–2004

PROFESSIONAL REGISTRATIONS

Engineer in Training (EIT),
2004

PROFESSIONAL RESPONSIBILITIES

Mr. Palakurthy is a Senior Transportation Engineer and Transportation Planner with more than 20 years of experience in travel model development, traffic simulation, and multimodal transportation planning. His professional experience includes travel demand model development, comprehensive plan preparations, land use forecasting, traffic impact studies, corridor studies, transportation fee programs, and air quality analysis. Mr. Palakurthy is skilled in many of the popular transportation software packages, GIS, and in various signal modeling programs. He is experienced in various travel demand software packages such as TransCAD, CUBE, VISUM, EMME/2, and QRS II. Mr. Palakurthy has extensive experience in the estimation of travel models and associated processing, review, and analysis of travel behavior survey data. He has used household travel diary surveys, on-board transit surveys, travel speed surveys, and other sources to estimate, update, and design regional and local travel models. Mr. Palakurthy is an expert in GISDK, the programming language for TransCAD, and Microsoft Visual Basic, the programming language used for creation of macros in Microsoft Office applications and Esri ArcGIS.

PROJECT EXPERIENCE

City of Fresno, CEQA Guidelines for Vehicle Miles Traveled Fresno, California

LSA recently assisted the City of Fresno in establishing VMT thresholds and subsequent CEQA documentation. As a part of this project, LSA addressed several policy related issues that have been raised by the State Office of Planning and Research in its recent Technical Advisory related to SB 743 legislation. These issues include definition of the region to evaluate, criteria from the baseline condition to consider, model screening application for streamlining and small projects, high quality transit corridors and transit-oriented development zones, and VMT mitigation measures. Mr. Palakurthy served as the lead modeler for this project.

Fresno Council of Governments, SB 743 Implementation Regional Guidelines Fresno County, California

LSA recently assisted the Fresno Council of Governments (Fresno COG) in the development of its SB 743 implementation guidelines and subsequent CEQA documentation for the 16 member jurisdictions. LSA used the Fresno COG activity-based model to develop the VMT metrics and thresholds for the region and its 16 member jurisdictions. Additionally, LSA also prepared a web-based VMT screening tool and a VMT calculator tool for the Fresno COG jurisdictions. Further, LSA provided Fresno COG with training, support, and a user guide for the VMT calculation tool. Mr. Palakurthy served as the lead modeler for this project. He developed the VMT calculator tool and assisted in the preparation of ArcGIS Online web-based screening tool.

City of Long Beach, VMT Thresholds Long Beach, California

The City of Long Beach selected LSA to guide it through implementation of SB 743. LSA was tasked with developing VMT thresholds and screening criteria for various projects, defining “region” for the purposes of project comparison,

identifying high-quality transit corridors, and preparing a list of possible VMT mitigation measures. Mr. Palakurthy led the modeling task with the development of VMT metrics and thresholds using the data from the regional travel demand model.

County of Orange, VMT Thresholds
Orange County, California

LSA recently developed the VMT analysis guidelines for the County of Orange. LSA is tasked with developing VMT thresholds and screening criteria for various projects, defining “region” for the purposes of project comparison, identifying high-quality transit corridors, and preparing a list of possible VMT mitigation measures. Mr. Palakurthy is the lead modeler for this project.

City of Visalia, VMT Thresholds and Implementation Guidelines
Visalia, California

LSA recently assisted the City of Visalia in establishing VMT thresholds for subsequent CEQA documentation. LSA prepared the City’s VMT analysis guideline, where it addressed several policy-related issues that have been raised by the State Office of Planning and Research in its recent Technical Advisory related to SB 743 legislation. These issues include definition of the region to evaluate, criteria from the baseline condition to consider for each jurisdiction, streamlining and small projects, high-quality transit corridors and transit-oriented development zones, and VMT mitigation measures. The policy document also evaluated how adoption of these new thresholds and guidelines help facilitate the City’s General Plan policies. LSA also created an online VMT Screening Tool for the City. The City’s Traffic Impact Analysis Guidelines were also updated incorporating VMT analysis methodology, screening criteria, and significant impact criteria. Mr. Palakurthy served as the lead technical analyst for the project.

City of Fresno, General Plan
Fresno, California

Mr. Palakurthy assisted with the preparation of the traffic and circulation study for this project. LSA has been tasked with preparing the updated City of Fresno General Plan EIR and traffic analysis. The traffic analysis was conducted to address general traffic flow, arterial hierarchy, and land use and circulation consistency. In addition, the General Plan Land Use Element was analyzed using VMT as a metric. LSA updated input data for the Fresno COG’s activity-based model to reflect an updated existing condition and for horizon-year scenarios. Traffic Analysis Zone VMT forecasts were compiled and low, moderate, and high VMT zones were identified. Final General Plan project VMT was compared with the existing regional averages to determine the change in VMT as a result of General Plan implementation.

Southern California Association of Governments, Screenline Count Database
Southern California (Various Locations)

LSA was selected to develop a master count database for the Southern California Association of Governments region with concentration on the screenlines of its travel model. Mr. Palakurthy developed modules in Microsoft Access to import the counts in different formats from different local government agencies into the master database in a consistent format. He also developed an SQL-based database that can be used to import and query the extremely detailed archival datasets from California’s Freeway Performance Monitoring System. The process included some generalized algorithms that would identify erroneous data. Mr. Palakurthy also assisted in the development of a module to geocode traffic counts, from various sources, which increased the amount of traffic counts placed on the network to an exponential degree using minimum amount of time and effort.



EXPERTISE

- Transportation Engineering
- Transportation Systems Planning

EDUCATION

Master of City and Regional Planning – Transportation Planning, California Polytechnic State University, San Luis Obispo, 2021

Master of Science in Engineering – Transportation Planning, California Polytechnic State University, San Luis Obispo, 2021

Bachelor of Science in Environmental Management and Protection, California Polytechnic State University, San Luis Obispo, 2019

PROFESSIONAL EXPERIENCE

Transportation Planner, LSA, Riverside, California, 2021–Present

PROFESSIONAL RESPONSIBILITIES

As a Transportation Planner at LSA’s Riverside office, Mr. Poon assists the mobility principals in conducting transportation impact analyses for small and large residential and commercial development projects, and specific plans for cities in southern and central California. He has also worked on VMT guidelines and mitigation projects.

PROJECT EXPERIENCE

City of Fresno, Project Services Related to a VMT Program and Related Environmental Analysis Fresno, California

Mr. Poon served as Transportation Planner/Engineer. He reviewed and sorted projects within the City of Fresno’s Short-Range Transit Plan. He researched the California Air Pollution Control Officers Association to find necessary variables to calculate VMT reduction of projects within the City of Fresno’s Short-Range Transit Plan. He also preformed scoring for a list of projects in the Short-Range Transit Plan based on accessibility and comfort. He also researched components of an Urban Design Calculator to determine variables contributing to VMT penalties and reduction. The project involved providing consulting and support services for project services related to a VMT mitigation program and related environmental analysis.

City of Hanford, VMT Analysis Thresholds and Implementation Guidelines Hanford, California

Mr. Poon served as Transportation Planner/Engineer. He created a graphical presentation of the VMT screening and analysis process. The project involved work for the adoption by the City of Hanford pursuant to SB 743 for the purpose of evaluating traffic/greenhouse gas (GHG) impacts in compliance with the requirements of CEQA and guidelines implementing CEQA. LSA defined methodology for determining VMT, developed Thresholds of Significance that are relevant and appropriate to Hanford and proposed development projects, transportation projects, and planning projects within the city; developed screening methodology and criteria to exempt low VMT-generating projects; developed a strategy and/or feasible menu of mitigation measures applicable to City needs in facilitating reduction of VMT and related GHG emissions; and developed a methodology for quantifying the VMT/GHG

reduction attributable to each mitigation measure or strategy.

City of Lemoore VMT Thresholds and Implementation Guidelines Lemoore, California

Mr. Poon served as Transportation Planner/Engineer. He created a graphical presentation of the VMT screening and analysis process. LSA surveyed large, urbanized areas around the state to identify what region has been established for VMT thresholds. LSA examined the trips into and out of Lemoore. Only trips having origins or destinations or both within Lemoore were considered; external pass-through trips were not considered. LSA calculated trip lengths as applicable for the city. The trip lengths were calculated for various trip purposes for single-family residential developments.

**Los Angeles County Metropolitan Transportation Authority, I-405 Express Lanes,
Los Angeles County, California**

Mr. Poon is assisting in the preparation of the VMT Mitigation Study for the project, intended to convert existing high-occupancy vehicle lanes on I-405 within the Sepulveda Pass area to high-occupancy toll lanes (i.e., ExpressLanes). As part of the VMT Mitigation Study, he reviewed the Regional Transportation Plans and Sustainable Community Strategies, the I-405 Comprehensive Multimodal Corridor Plan, local planning documents, and the Los Angeles County Metropolitan Transportation Authority VMT Mitigation Program to identify VMT mitigation strategies. He is also currently assisting in the preparation of a VMT Mitigation Memorandum to identify projects and programs that can be used to offset induced VMT impacts caused by the construction of ExpressLanes.

**City of Clovis, Heritage Grove Specific Plan EIR and Technical Studies
Clovis, California**

Mr. Poon assisted in the preparation of the scope of work to determine the study area for potential operational deficiencies as a result of the proposed Heritage Grove Specific Plan. Furthermore, Mr. Poon identified potential key circulation corridors that can be affected by the implementation of a specific plan.

**City of Menifee, Menifee Valley Specific Plan EIR and Technical Studies
Menifee, California**

Mr. Poon assisted in the development of a Traffic Study to determine the traffic impacts of the proposed Menifee Valley Specific Plan. Mr. Poon has used Synchro to analyze intersection delay and developed recommendations (e.g., signal timing adjustments and turn pocket extensions) to improve traffic flow and increase safety.

**City of Irwindale, Industrial/Commercial Business Park EIR
Irwindale, California**

Mr. Poon aided in preparation of a traffic study assessing impacts resulting from the demolition of existing structures on 63.5 acres currently occupied by the Irwindale Speedway and development of proposed uses associated with the Speedway Commerce Specific Plan. The project includes a Zone Change for General Plan consistency purposes, a Development Agreement, and a Tentative Parcel Map. Based on the conclusions of the Initial Study that was published with the Notice of Preparation, the EIR focuses on transportation and service systems. Leading up to the publication of the Draft EIR, LSA has participated in biweekly status calls with the City and the applicant team to request data needs and report on progress.

**Anton DevCo Inc., Anton Mission Grove Traffic Operational Analysis
Riverside, California**

Mr. Poon assisted Project Manager Kenneth Tan in preparing a traffic operational analysis for the Anton Mission Grove project. This project proposes to redevelop a vacant K-Mart into a 347-dwelling-unit, multifamily residential project. Mr. Poon aided in determining study intersections and roadway segments, traffic volume development, traffic operation and recommended improvement analysis, active transportation and public transit analysis, and sight distance analysis.

**InSite Property Group, Parking Study for the 127 Concord Street Self-Storage
Glendale, California**

Mr. Poon prepared the parking study for this project, which included a development of a 120,000-square-foot self-storage warehouse and 1,000-square-foot office. Mr. Poon prepared the parking analysis according to the Institute of Transportation Engineers' *Parking Generation Manual* and other cities' municipal codes to justify a parking reduction for the project site.

ARYANNA GOMEZ

ASSISTANT TRANSPORT PLANNER/ENGINEER



EXPERTISE

- Transportation Planning and Traffic Impact Assessment
- Data Collection and Analysis
- Spatial and Site Analysis
- Geographic Information System (GIS)

EDUCATION

B.S. Urban and Regional Planning; Geographic Information System Minor, California State Polytechnic University, Pomona 2024

PROFESSIONAL EXPERIENCE

Assistant Transportation Planner/Engineer, LSA, Irvine, January 2025–Present

Administrative Internship, City of Upland January–July 2024

PROFESSIONAL CERTIFICATIONS/REGISTRATIONS

American Planning Association

AWARDS/HONORS

Dean's List 2021/2023, 3rd Place Senior Research Project

PROFESSIONAL RESPONSIBILITIES

As an Assistant Transportation Planner/Engineer at LSA's Irvine office, Ms. Gomez applies her B.S. in Urban and Regional Planning, complimented with a minor in GIS, to support transportation project managers. Leveraging her proficiency in AutoCAD, ArcGIS Pro, and traffic analysis software (e.g., Synchro and Sim Traffic), she assists in conducting traffic studies, preparing technical reports, and performing spatial analysis. She contributes to traffic and parking impact evaluation, ensuring accurate and comprehensive deliverables that align with client objectives and municipal regulations.

PROJECT EXPERIENCE

Kamla Hotel Arroyo Grande, California

Ms. Gomez assisted in the preparation of the Memorandum of Assumptions for submittal to the City of Arroyo Grande, ensuring all required elements were included per the City of Arroyo Grande's Multimodal Transportation Impact Study Guidelines. She supported the creation of the project's trip generation, distribution, and assignment within the memorandum.

California State Polytechnic University, Pomona, Campus Mobility Hub Pomona, California

Ms. Gomez contributed to the development of a proposed campus mobility hub aimed at improving transportation efficiency and promoting sustainable micromobility options. She conducted in-depth analysis of campus transportation systems and wayfinding, identifying areas for improvement. Ms. Gomez utilized AutoCAD, SketchUp, and Twinmotion to create site plans, renderings, and elevations for the project, which focused on reducing traffic congestion and enhancing multimodal accessibility.

City of Upland, Public Park Improvement Initiative Upland, California

Ms. Gomez collaborated with the City of Upland's Public Works Department to develop recommendations for public parks improvements based on field reconnaissance and community feedback. She prepared a comprehensive presentation that highlighted findings and possible solutions. This initiative emphasized enhancing mobility and accessibility for local residents while aligning with community needs.

City of San Diego, Zoning Policies and Affordable Housing San Diego, California

Ms. Gomez performed a thorough analysis on the City of San Diego's zoning regulations to evaluate their potential impact on affordable housing development in the downtown area. She conducted case study analysis, stakeholder interviews, and evaluated policies such as the 2023 Housing Zoning Ordinance Update and SB 8 to propose policy recommendations.



EXPERTISE

- CEQA Project Management
- Environmental Planning and Impact Analysis
- Land Use Planning and Development

EDUCATION

B.S., Political Science, Santa Clara University, 2003

PROFESSIONAL EXPERIENCE

Principal, LSA, Clovis, California, 2017–Present

Senior Associate, PlaceWorks, Clovis, California, 2006–2017

Project Coordinator, Springboard Forward, Mountain View, California, 2005–2006

South Bay Program Coordinator, Greenbelt Alliance, San Jose, California, 2004

PROFESSIONAL AFFILIATIONS

Association of Environmental Professionals (AEP)

PROFESSIONAL RESPONSIBILITIES

Mr. Simpson is a CEQA and NEPA practitioner and project manager with over 16 years of experience. He has served as project manager or key staff on over 70 projects in Northern California and the Central Valley. He has extensive experience with project-level analysis for mixed-use development, school facilities, public facilities, and open space/recreational facilities. His responsibilities at LSA include project management and preparation of CEQA/NEPA documents.

PROJECT EXPERIENCE

City of Clovis, Heritage Grove Specific Plan EIR Clovis, Fresno County, California

Mr. Simpson is currently managing the preparation of an EIR for the Heritage Grove Specific Plan, which would include residential, retail, commercial, park, and public facility uses within a 881-acre area currently located within the Sphere of Influence of the City of Clovis. Implementation of the Specific Plan would result in over 8,500 residential units, 600,000 square feet of retail uses, and nearly 800,000 square feet of commercial uses. Currently in the preparation phase, the program-level EIR will include a detailed transportation analysis, as well as technical studies to address air quality, greenhouse gases, to address potential impacts occurring as specific projects are developed during buildout of the Specific Plan.

City of Clovis, Tract Map 6343 EIR Clovis, Fresno County, California

Mr. Simpson is currently managing the preparation of the Tract Map 6343 EIR, a project that proposes the annexation of 246 acres from Fresno County to the City of Clovis, and the development of 590 residential units within an approximately 72-acre project site. Mr. Simpson is overseeing the preparation of a detailed transportation analysis, along with technical studies analyzing potential environmental impacts to agricultural resources, air quality, biological resources, cultural resources, and greenhouse gases.

City of Clovis, Heritage Grove Official Plan Lines Clovis, Fresno County, California

Mr. Simpson prepared an Addendum to the City of Clovis General Plan EIR to identify any potential environmental impacts that could occur through the establishment of Official Plan Lines for North Clovis Avenue, East Copper Avenue, East Behymer Avenue, East International Avenue, and North Minnewawa Avenue. In 2019, Mr. Simpson prepared a separate Addendum City of Clovis General Plan EIR focusing only on a segment of North Clovis Avenue.

City of Clovis, Dog Park Master Plan IS/MND Clovis, Fresno County, California

Mr. Simpson managed the preparation of the Dog Park Master Plan IS/MND for the construction and implementation of the citywide Dog Park Master Plan intended to serve as a planning policy document that establishes best practices, design standards, and planning recommendations for a network of potential dog parks. The IS/MND evaluated the potential short-term environmental impacts resulting from construction of the dog parks, as well as potential long-term operational impacts resulting from park usage and maintenance.

City of Fresno, General Plan EIR Update
Fresno, Fresno County, California

Mr. Simpson managed the preparation of the update of the City's General Plan Master EIR to a Program EIR in order for it to be in conformance with State law and to be consistent with recent legislative changes. The intent of the update was to streamline implementation of the General Plan by supporting the General Plan's programs and projects with updated environmental analysis, regulatory framework, and mitigation measures pursuant to CEQA. Key components included an air quality analysis and health risk assessment, updating the City's Greenhouse Gas Reduction Plan, and transportation and VMT analyses.

City of Fresno, General Plan Program EIR Implementation Assistance
Fresno, Fresno County, California

Mr. Simpson is working closely with City of Fresno staff to develop a comprehensive update to the City's Initial Study template to include standard language and instructions for the preparation of future Initial Studies. Mr. Simpson is developing standard language to include as baseline information as well as suggested standard mitigation measures that relies on the Program EIR. Mr. Simpson is also updating the City's standard Mitigation Monitoring and Reporting Program, and Environmental Assessment Application Form to allow for streamlined implementation of future projects.

City of Fresno, Standard Forms and Language for CEQA Documents
Fresno, Fresno County, California

Mr. Simpson worked closely with City of Fresno staff to develop a comprehensive update to the City's Initial Study template to include standard language and instructions for the preparation of future Initial Studies. Mr. Simpson developed standard language to include as baseline information as well as suggested standard mitigation measures. Mr. Simpson also updated the City's standard Mitigation Monitoring and Reporting Program and Operations Checklist to allow for streamlined implementation of future projects.

City of Madera, Village D Specific Plan EIR
Madera, Madera County, California

Mr. Simpson managed a major EIR for the City of Madera that evaluated the development of a new compact mixed-use community that extends the City of Madera's existing urban fabric, creates walkable and bikeable streets, and integrates open space throughout the area east of the City limits. The EIR analyzed how implementation of the Specific Plan could result in environmental impacts, and where applicable, how those potential impacts could be reduced. To do this, both program-level and project-level analyses were used in the EIR to address potential impacts occurring as specific projects are developed during buildout of the Specific Plan.

City of Porterville, Integrated Master Plan EIR
City of Porterville, Tulare County, California

Mr. Simpson is currently working with City of Porterville staff to prepare an EIR to evaluate potential environmental impacts from implementation of citywide master plans for the water system, sanitary sewer system, storm drain system, and wastewater treatment facilities. Technical studies required for the EIR include an air quality and greenhouse gas emissions study, biological resources evaluation, and cultural resources study.

City of Berkeley, 1110 University Avenue IS/MND and Planning Services
Berkeley, Alameda County, California

Mr. Simpson managed the CEQA documentation and provided staff support for a mixed-use project located along a busy thoroughfare. He also prepared the Zoning Adjustments Board staff report and attended City meetings related to the project.



LSA

WWW.LSA.NET