



California Environmental Quality Act Vehicle Miles Traveled Mitigation: Frequently Asked Questions

This document provides an overview of vehicle miles traveled (VMT) mitigation under the California Environmental Quality Act (CEQA), with a focus on how implementation occurs in practice. It is intended to address common questions about when VMT mitigation is required, how it is applied in practice, and how agencies evaluate feasibility when making project approval decisions.

The intent is to provide a grounded and practical understanding of VMT mitigation that reflects real-world implementation, including the role of exemptions, screening thresholds, and feasibility constraints. This overview is not intended to be exhaustive or prescriptive, but rather to clarify how implementation under existing law operates.

The Office of Land Use and Climate Innovation (LCI) will continue to develop additional materials to further support understanding of this policy area.

When would an agency require mitigation as a condition of approval for a project?

CEQA requires all public agencies to consider the potential environmental impacts of proposed projects. If those impacts are determined to be significant, public agencies must require changes in the project to reduce those impacts if it is feasible to do so. These changes are often referred to as “mitigation measures.”

Does CEQA require the analysis of impacts related to transportation?

Yes. Among other things, CEQA requires agencies to evaluate whether a project will cause, or result in, an excessive amount of automobile travel on our roads. This is usually measured in “vehicle miles traveled.”

According to the Legislature, new methodologies under CEQA are needed for evaluating transportation impacts that better promote the state’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promote the development of a multimodal transportation system, and provide clean, efficient access to destinations. Visit our [CEQA Transportation Impacts webpage](#) for additional environmental, health, and fiscal benefits of VMT reduction.

When would a project need to mitigate its VMT?

The potential level of VMT impact and need for mitigation depends on the type of project and what the agency uses as its “threshold of significance,” or the level of impact that is significant enough to require mitigation.

For example, many agencies consider impacts from a new housing or office project to be significant if the VMT attributable to the projects is more than 85% of average for the area. These project types might result in the generation of a significant amount of VMT if they are not designed or located to minimize driving through compact and walkable designs or are located far away from existing goods and services.

New transportation infrastructure might also encourage more people to drive than currently do. This is commonly referred to as “induced travel” or “induced demand” which also increases VMT above what we currently experience. Examples of infrastructure that may induce travel and increase VMT include highway expansions, lane additions, interchange expansions, etc. In practice, this effect is typically evaluated using regional travel demand models and other forecasting tools, which estimate how changes in system capacity influence travel behavior over time.

Does this mean that every project will require VMT mitigation?

No. Only projects that are subject to CEQA and have VMT impacts may need to include VMT mitigation. Many projects are exempt from CEQA, including many urban infill housing projects. (See, e.g., Pub. Resources Code § 21080.66.) Similarly, many agencies will presume that projects located close to transit, or in areas where existing VMT is low and that incorporate similar features - such as density, mix of uses, and transit accessibility - will not have a significant impact, and will not require mitigation. Likewise, transportation infrastructure such as transit, bicycle and pedestrian improvements would also normally be presumed to have a less than significant impact.

What happens if a project has a significant VMT impact, but there is no good way to mitigate it? Does that mean the agency can't approve it, even if it is a good project for the community?

CEQA only allows agencies to require mitigation if it is “feasible,” or “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” (Pub. Resources Code § 21061.1.) Some courts have interpreted this term to mean “desirability” broadly. If an agency finds that mitigation is infeasible, it just needs evidence in its record to support that finding.

If an agency finds that mitigation is not feasible, CEQA still allows agencies to approve projects even if there will still be some significant environmental impacts. To do so, the agency just needs to go on record explaining why it is approving the project despite its environmental impacts, for example, because it will provide needed jobs or housing. This is called a “statement of overriding considerations.”

In practice, it is common for agencies to require some mitigation, even if it won't reduce all impacts to a less than significant level. (See, e.g., “[Mitigating VMT from Highway Expansion Projects: Early Insights from California](#),” Lee, Amy, PhD; Volker, Jamey, PhD; Handy, Susan, PhD (2026).)

How much VMT mitigation is required for a project?

CEQA does not require a fixed amount of VMT mitigation. The level of mitigation depends on the type of project, the nature of its impacts, and what is feasible to implement. Agencies may still approve projects even if impacts are not fully mitigated, provided they disclose those impacts and adopt a statement of overriding considerations explaining why the project's benefits outweigh its environmental impacts.

For land use projects (such as housing or commercial development), agencies generally require mitigation only to the extent needed to reduce impacts below a defined threshold of significance, if feasible. Impacts tend to be site specific, and projects can usually avoid or minimize impacts through their location or design, meaning additional mitigation may not be required. Where impacts remain, off-site mitigation can be applied to the extent feasible but is not required to fully offset all project-related VMT.

For transportation projects, such as highway expansions, impacts may include induced travel that increases VMT at a broader, system-wide level. Mitigation approaches vary, and

in practice often address a portion of the impact based on feasibility and available resources.

In short, just like any other mitigation in CEQA, VMT mitigation is case-specific, feasibility-based, and often partial. There is not a requirement to fully offset all impacts.

How do agencies determine whether VMT mitigation is “feasible”?

Feasibility is evaluated based on whether a mitigation measure can be implemented in a reasonable and practical manner, taking into account economic, environmental, social, and technological factors. This includes considerations such as whether the measure is proportional to the project’s impact, whether it can be implemented within a reasonable timeframe, and whether it would undermine the project’s viability.

These factors can apply differently depending on the type of project. For land use projects, feasibility is often closely tied to project economics and site-specific constraints, with mitigation evaluated in the context of the project’s financial viability and design, among other factors. For transportation projects, feasibility may be influenced more by system-level considerations, and the scale of the project’s impacts, which can be broader and more diffuse.

Agencies must support feasibility determinations with evidence in the administrative record, but they retain discretion to weigh these factors on a case-by-case basis.