



EQUITABLE INFILL INCENTIVES REPORT

**Planning and Conservation League's
Equitable Infill Incentives Initiative
Interim Report**

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Note from the author:

This is an interim report on progress made thus far in an ongoing policy development effort. These findings are the Planning and Conservation League's (PCL's) own attempt to synthesize the large amount of input we have received from many cross-interest, cross-sector stakeholders, and do not necessarily reflect the opinions of all participants and contributors to this process. We consider the policy recommendations presented here to be a draft, and subject to successive iterations of input and refinement by the Roundtable participants and others.

PCL is very grateful for the enthusiasm and insights that these many participants have brought to this analysis thus far. Questions certainly remain, and more work is certainly needed to be done on these subjects, but PCL hopes that these draft recommendations provide a sound foundation to build upon in ensuing conversations.

Contents:

Executive Summary	3
<u>Full Report</u>	
Introduction and Scope	5
Infill Definition Analysis	7
Questions	7
Illustrative examples	8
Center for Neighborhood Technology Research	
VMT Performance Analysis and Infill Index	18
Infill Definition Recommendations	26
Inclusionary and Anti-displacement Provision Analysis	30
Questions	32
Illustrative Examples	33
Inclusionary and Anti-Displacement Criteria Recommendations	41
Policy Applications of Combined Equitable Infill Incentive Criteria	47
Next Steps	53
<u>Appendices</u>	
A: Table of Existing Encoded CA Infill and Urbanized Area Definitions	56
B: OPR Technical Advisory on CEQA review of Housing Projects	69
C: CNT VMT Modeling Data Table, per Jurisdictions	85
D: ClimatePlan Partners "Commitment to Investment Without Displacement"	158

Executive Summary:

In response to California's deepening housing affordability crisis, through the course of 2019, the Planning and Conservation League (PCL) consulted and convened cross-interest experts with the aim of identifying an improved standard of criteria for equitable infill incentives in urban, suburban, and rural contexts, that could be used for a range of state and local policy applications. These consultations, culminating in two cross-sector "Roundtables," have brought together environmental and equity advocates, builders, and state and local agencies with the goals of:

- **identifying more effective infill definitions for rural, suburban and urban conditions**
- **identifying the appropriate mechanisms to ensure this infill investment is implemented equitably and protects existing communities and their most vulnerable residents from displacement**
- **developing policy guidance for applying these infill definitions and equity protections in a range of contexts**

The pros and cons of existing infill definitions and equity protections across California code and program guidelines were analyzed at length, and statewide VMT performance research and mapping was conducted by the Center for Neighborhood Technology (CNT) to develop an "Infill Index" to inform these policy discussions. This Interim Report outlines these analyses, the draft equitable infill criteria recommendations that have emerged, multiple areas of question that warrant further exploration, and the many various potential policy applications for the criteria that were identified.

Primary takeaways from these discussions include a substantial agreement that previous approaches to defining infill have been either not reflective enough of environmental and climate concerns, or have been too prescriptive to be effective incentives, particularly for rural communities. There is also a fairly significant agreement that we are not doing enough to protect existing communities from displacement caused by these investments. However, finding a consensus on what those protections should be, while not disincentivizing the kind of development we need, remains a challenge.

While there are indeed many important questions identified for further consideration, a compelling draft recommendation for the framework of a new equitable infill incentive has taken shape. The basics of which include:

- **that "infill" be primarily defined by a Vehicle Mile Travelled (VMT) performance-based metric of "location efficiency"—directing incentives to low-VMT "Green Zones" (areas of -15% regional or city average VMT), with strict exclusions of a shortlist of sensitive lands essential to environmental and public health protection, and**
- **that projects which receive "infill" incentives must meet a set of base-line inclusionary and anti-displacement requirements, including basic and affordable housing proportions, restrictions on demolition, and relocation assistance and first-return obligations where demolition is deemed necessary—all of which, with development, could also eventually extend to affordable, local business spaces**

There are many further details outlined in the report on these recommendations, including options for how incentives could be extended to projects outside of Green Zones with demonstration of an equivalent VMT-reduction performance. Among the many questions identified for further exploration, some key issues that warrant immediate attention in our next round of consultations include the following:

Rural VMT: ensuring that the proposed VMT performance-based metric for defining infill will be effective for, and not punishing of, unincorporated rural communities

Sensitive Lands: developing a consensus on the short-list of essential sensitive lands for the exclusion of applicability from incentives, as well as the continued development of a centralized, iteratively updated and accountable mapping database for agencies, developers, and the public

Affordable Housing Green Zone: exploration of the feasibility of establishing a separate “Green Zone” for affordable housing, which, based on CNT’s mapping, could potentially provide a greater area of coverage, including more opportunities in rural areas

Affordable Commercial Space Definitions: determination of standard definitions for what qualifies as “affordable,” “small,” and/or “local” commercial space, for the purposes of implementing the proposed inclusionary and anti-displacement measures

General Inclusionary and Anti-displacement Criteria: we recognize more vetting is needed with our partners to assess the efficacy of these recommendations generally.

With the successful refinement of the proposed Low-VMT Equitable Infill Incentive framework, equitable location-efficiency criteria could be adapted across California’s incentive programs including: CEQA streamlining mechanisms; myriad state and local housing and infrastructure funding programs; special financing districts like EIFDs, CRIAs, and NIFTIs and proposals to reinstitute redevelopment; Opportunity Zone deployment; zoning reform proposals; SB 743 implementation and VMT mitigation strategies; implementation of the Governor’s Executive Order on Climate, the Pro-Housing Guidelines, and the State’s general transportation and infrastructure investments.

While these views are not necessarily shared by all that participated in this effort, these discussions have solidified PCL’s perspective. Namely that to meet California’s environmental and climate goals, we must direct as much investment towards infill development and infrastructure as is feasible. Additionally, these investments must be coupled with basic equity protections to guard existing vulnerable residents against gentrification and displacement pressures that such investments can bring. We do not wish to inhibit housing development potential. On the contrary, we seek only to incentivize the right things in the right place. Yet, if our incentive programs do not align with these basic principles, we risk the perpetuation of historical patterns of segregation and inequitable access to opportunity and undermine our ability to meet our climate goals by forcing low-wage workers into long commutes.

These findings are PCL’s attempt to synthesize the substantial input we have received from many cross-interest stakeholders. The draft recommendations presented herein are subject to successive iterations of input by the Roundtable participants and others. More work is certainly needed, but PCL hopes these draft recommendations provide a sound foundation to build upon in ensuing conversations.

Full Report: PCL's Findings from the Equitable Infill Incentives Roundtable

Introduction

Siting criteria, parameters for appropriate uses, density requirements, and standards for appropriate levels of review vary greatly across areas of California code for incenting smart-growth. There is an extreme lack of consistency in these criteria across our CEQA streamlining mechanisms, financing incentive programs, and the way we prioritize our transportation and land use investment generally. Many of these criteria are outdated, are not aligned with California's climate laws or incent "smart-growth" as we understand it today. Many do not adequately protect our natural and working lands or our most vulnerable communities.

Throughout 2019, PCL has consulted and convened cross-interest experts to identify an improved criteria standard for equitable infill incentives in urban, suburban, and rural contexts. Such a standard could be used for a range of state and local policy applications. These consultations, culminating in two cross-sector "Roundtables," have brought together environmental and equity advocates, builders, and state and local agencies with the goals of:

- identifying more effective infill definitions for rural, suburban and urban contexts;**
- identifying the appropriate mechanisms to ensure this infill investment is implemented equitably, protecting existing communities and their most vulnerable residents from displacement; and**
- developing policy guidance for how to apply these infill definitions and equity protections in a range of contexts.**

Substantial past and ongoing work exists on these topics. There are many conversations focused on accelerating housing development and infill investment, and there are many conversations focused on how to ensure our investments are affordable and protective of existing communities. However, rarely do these conversations take place together with the aim of shared solutions.

This initiative has intended to build upon the work and experience of the experts we have convened in the development of a menu of recommendations for how best to direct California's housing and infrastructure investment in a way that will achieve our housing, environmental, health, and equity goals simultaneously.

All agree that California is experiencing a housing shortage, and particularly an affordable housing shortage. We need to build much more housing, but, PCL does not believe that building alone will solve this problem. We must also preserve our existing affordable housing stock. Further, if housing goals are to be in alignment with California's climate and equity goals, we must consider not only the number of units produced, but also where and what that housing is, and whom it serves.

While we must direct as much investment towards infill development and infrastructure as is feasible, we must also recognize that infill investment inevitably adds to gentrification and displacement pressures on low-income residents in these existing communities. Thus, this needed infill investment

must be coupled with inclusionary and anti-displacement protections to guard against the perpetuation of historical patterns of segregation, to ensure the vulnerable residents of these communities equitably reap the benefits of these investments, and to ensure that our ability to meet our climate goals is not undermined by forcing low-wage workers into long commutes.

There is great latitude in California for local governments and developers to build wherever and whatever. Our incentive programs should be used to promote the very best development that meets all of our environmental, health, and equity goals—creating the right things in the right places. For PCL, this means low-Vehicle Miles Traveled (VMT) equitable infill.

With combined input of the many cross-interest participants of the Roundtable, the following analyses, findings, and draft policy recommendations are aimed at identifying what low-VMT equitable infill is, and how best to promote it.

Analysis: Defining Infill

The first stage of input gathering, and the first Roundtable discussion, were focused on the challenges of how to better define “infill.” In order to develop policies that better incentivize equitable infill, we must first define the term. Currently, there are numerous definitions of infill in statutes, regulations, and grant program guidelines, corresponding with a variety of incentives. (See Appendix A for a comprehensive list of these definitions, and Appendix B, for an analysis of CEQA streamlining provisions for housing). Our aim was to synthesize the numerous past approaches to defining infill into a shortlist of key questions and illustrative examples of how such questions have previously been answered, along with the potential pros and cons associated with these approaches.

Questions:

In determining how best to define infill, the following shortlist of key questions was raised and considered by the Roundtable:

- Is a universal infill definition possible or effective? Or is a set of infill definitions tailored to the differing conditions of rural, suburban, and transit-oriented urban contexts needed?
- Should infill be defined as a distinction between previously disturbed land and undisturbed land? Or land that is surrounded by certain types of urban uses vs. undeveloped greenfield land?
- In an urban-use boundary-condition approach, what is the appropriate perimeter proportion of the site that should be adjacent to existing “qualified urban uses?” Does this differ in a rural context vs. an urban context?
 - What are the appropriate “qualified urban uses”?
 - What is the appropriate definition of “urbanized area”?
 - How should natural boundaries be handled (waterways, cliffs, etc.)?
- Is “location-efficiency” or “transportation-efficiency” an important component? Ultimately, when we say infill, are we picturing a walkable, central city (whether it be urban, rural, or suburban)? Or is it enough that the land was previously developed with urban uses or surrounded by urban uses?
 - What if that previous development occurred in a place that we no longer want to encourage or concentrate development?
 - What if there is a place that has not been developed but could offer greater location efficiency than surrounding alternatives?
- If we want to add a location-efficiency component, what does that look like? Does it involve the proximity to transit? Per capita VMT based on regional or city average?
 - Should the threshold be tied to the locale’s existing VMT or the project’s projected VMT?
 - How does this affect communities that might not have low-VMT or those not able to support transit now, but potentially could with densification?

- If we have a location-efficiency component, do we still need to limit the infill definition to city limits or urbanized areas or other boundary conditions?
- Where there is transit, how should the “transit priority area” be defined? (a half-mile radius to a “high-quality transit stop” is the current standard).
 - How should advances, or anticipated advances, in shared-mobility interplay with this definition? In other words, should the radius around transit be expanded because people are willing to ride a shared electric bike up to 3 miles to that transit?
 - Should this be constrained to existing transit service or planned transit?
 - If planned, what should be the horizon, a long-term (20 year) planning document (RTP) or a 5-year planning/funding document (RTIP)?
- What are the appropriate exclusions for sensitive lands to prioritize public safety and protect the environment (e.g., fire zones, endangered species habitat, hazardous waste sites, etc.)?
 - Is there a way to make these exclusions clear and mappable to prevent litigation risks?
- Does it matter what type of development is proposed? (Residential, commercial, mixed-use, employment center, schools, etc.)
 - Should the density of the project be a criterion, and what are the appropriate densities depending on context?
 - Does it matter how large the parcel is? 5 acres? 4 acres?
 - How can the appropriate mix of uses be considered and accommodated to provide a better productive jobs-housing-services-fit?

Illustrative Examples of the Evolution of “Infill” Definitions:

Traditional Siting Criteria and Boundary Condition Approaches

An example of an early but often used CEQA exemption, established in 1998, “Class 32” (CEQA Regs.) offers a categorical exemption from CEQA review for infill projects within incorporated cities:

15332. In-Fill Development Projects.

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

The characterization of infill articulated in the Class 32 exemption is problematic in multiple ways. First, while widely used in cities, it does not extend to unincorporated county land, and so does not provide for the needs of suburban or small rural communities. “Substantially surrounded” by urban uses has no

legal definition in code, and so can be interpreted too broadly. Subparagraph (c) offers an overly limited list of excluded sensitive lands that do not adequately consider other necessary environmental and public safety considerations. The stipulation that the project must not result in any significant effects to “traffic” does not adequately accommodate the new multi-modal VMT-based methodology for analyzing transportation impacts under CEQA, mandated by SB 743 (2013).

SB 1925 (2002), followed similarly by SB 375 (2008), set a higher standard for defining infill for the purposes of CEQA streamlining:

PRC 21061.3. Infill site means a site in an urbanized area that meets either of the following criteria:

(a) The site has not been previously developed for urban uses and both of the following apply:

(1) The site is immediately adjacent to parcels that are developed with qualified urban uses, or at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses, and the remaining 25 percent of the site adjoins parcels that have previously been developed for qualified urban uses.

(2) No parcel within the site has been created within the past 10 years unless the parcel was created as a result of the plan of a redevelopment agency.

(b) The site has been previously developed for qualified urban uses.

This standard definition provided a number of notable implications to what constitutes “infill”. Firstly, this approach attempts to provide an infill option for unincorporated areas that Class 32 does not. An applicable “urbanized area” is governed by PRC 21071 (see Appendix A). “Urbanized Areas” can include small cities and unincorporated areas only if an action is taken by the county to identify that “urban” area, and must then be approved by the Governor’s Office of Planning and Research (OPR). To OPR’s knowledge, this protracted process has never been used by a county, so this approach has also not adequately provided coverage of “infill” to meet the needs of unincorporated communities.

Secondly, the standard includes an explicit proportion of boundary conditions; specifically, the site must be either 100% surrounded by existing urban uses or no more than 25% of previous urban uses. The efficacy of these proportions has been subject to extensive debate (discussed more below), and this also raises the question of what constitutes a “qualified urban use.” The standard is governed, like most CEQA exemptions, by PRC 21072, where a “qualified urban use” means any “residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.” Needed changes to this definition have also been discussed, including suggestions that conditions for an “urban park” should also be defined. Additionally, a distinction between “urban residential” and “rural residential” must be defined potentially by a density threshold of one unit per acre (roughly in line with the US census methodology for determining urban areas, more on this below). For the latter, the argument is that very low density rural residential housing should not be included in such a definition of “urban.”

SB 226 (2011) then presented an approach to incentives for housing and mixed-use development consistent with a Sustainable Communities Strategy (per SB 375) and “low VMT zone” performance standards set forth by Appendix M of the CEQA guidelines. SB 226 only requires the perimeter to be 75% surrounded by existing urban uses, and also directly accommodates some unincorporated areas outside of low-VMT zones. However, this is limited to only 100% affordable housing projects:

PRC 21094.5:

(B) Is located within an urban area on a site that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-

of-way from, parcels that are developed with qualified urban uses.

(5) “Urban area” includes either an incorporated city or an unincorporated area that is completely surrounded by one or more incorporated cities that meets both of the following criteria:

(A) The population of the unincorporated area and the population of the surrounding incorporated cities equal a population of 100,000 or more.

(B) The population density of the unincorporated area is equal to, or greater than, the population density of the surrounding cities.

SB 35 (2017) has set a widely used standard for defining infill, offering by-right ministerial approval to projects (that meet many other requirements) according to the below infill criteria:

65913.4. (a) A development proponent may submit an application for a development that is subject to the streamlined, ministerial approval process provided by subdivision (b) and not subject to a conditional use permit if the development satisfies all of the following objective planning standards:

(1) The development is a multifamily housing development that contains two or more residential units.

(2) The development is located on a site that satisfies all of the following:

(A) A site that is a legal parcel or parcels located in a city if, and only if, the city boundaries include some portion of either an urbanized area or urban cluster, as designated by the United States Census Bureau, or, for unincorporated areas, a legal parcel or parcels wholly within the boundaries of an urbanized area or urban cluster, as designated by the United States Census Bureau.

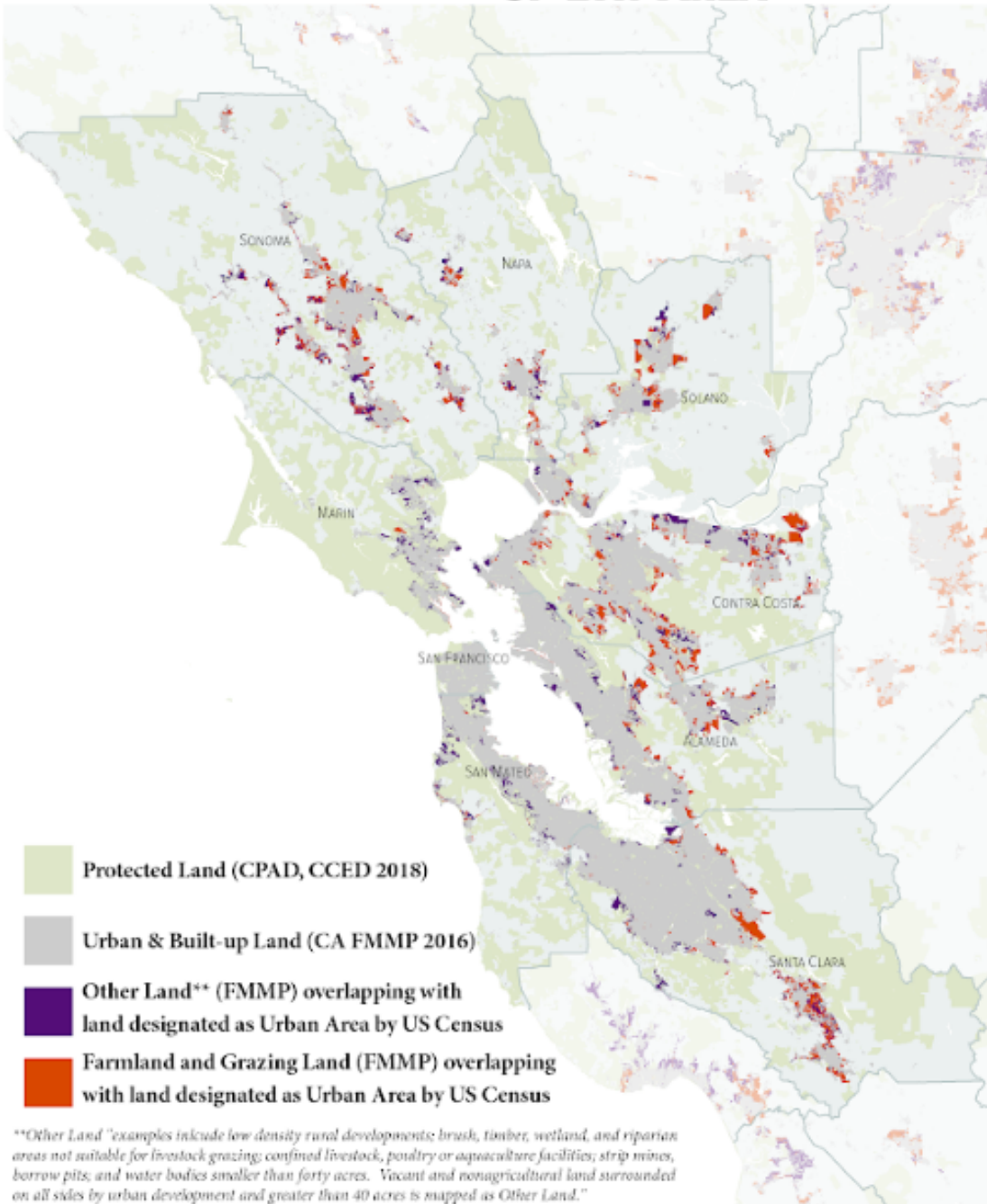
(B) A site in which at least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses. For the purposes of this section, parcels that are only separated by a street or highway shall be considered to be adjoined.

(C) A site that is zoned for residential use or residential mixed-use development, or has a general plan designation that allows residential use or a mix of residential and nonresidential uses, with at least two-thirds of the square footage of the development designated for residential use.

Among other alterations, SB 35 replaces the requirements of PRC 21071 to determine what is urban in unincorporated areas, with U.S. Census Bureau defined “urbanized areas,” offering much broader applicability to suburban and rural communities.

The U.S. Census Bureau’s methodology for determining what is “urban” and “rural” has evolved over many decades, but for the 2010 Census, the Bureau identified two types of urban areas: Urbanized Areas (UAs) of 50,000 or more people, and Urban Clusters (UCs) of at least 2,500 and less than 50,000 people. How each is mapped across census tracts is not entirely straightforward, but in most places roughly corresponds to one unit per acre density threshold for what is considered urban. Using the census-defined “urbanized area” offers much higher applicability to unincorporated communities, which is why PCL has advocated for it in many instances. However, inadequacies of the census urban delineation have been found as this standard has begun to be used more broadly. First, it is problematic for Californian statute and incentive programs to be reliant on a continually evolving federal definition that neither the State nor local jurisdictions have control over. More problematic is that census urbanized area mapping methodology is inconsistent and does not always correspond to the reality on the ground. Often, locations where it would make good sense to build in rural communities are not covered by the census-defined urban area, and sensitive habitat, historical, and agricultural resource areas that would make little sense to build in are included (see map below). Again, PCL has advocated for the use of the census-defined urban area many times for lack of a better standard for unincorporated areas, but a new standard is needed.

COMPARISON OF URBANIZED AREAS SF BAY AREA



SB 35 also included a commonly used, slightly abridged list of sensitive areas to be excluded from applicable sites. Previously, PRC 21159.21, a much more extensive list of sensitive land exclusions, governed many CEQA exemptions.

65913.4. (a) (6) The development is not located on a site that is any of the following:

(A) A coastal zone, as defined in Division 20 (commencing with Section 30000) of the Public Resources Code.
(B) Either prime farmland or farmland of statewide importance, as defined pursuant to United States Department of Agriculture land inventory and monitoring criteria, as modified for California, and designated on the maps prepared by the Farmland Mapping and Monitoring Program of the Department of Conservation, or land zoned or designated for agricultural protection or preservation by a local ballot measure that was approved by the voters of that jurisdiction.

(C) Wetlands, as defined in the United States Fish and Wildlife Service Manual, Part 660 FW 2 (June 21, 1993).

(D) Within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Section 51178, or within a high or very high fire hazard severity zone as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 of the Public Resources Code. This subparagraph does not apply to sites excluded from the specified hazard zones by a local agency, pursuant to subdivision (b) of Section 51179, or sites that have adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development.

(E) A hazardous waste site that is listed pursuant to Section 65962.5 or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code, unless the Department of Toxic Substances Control has cleared the site for residential use or residential mixed uses.

(F) Within a delineated earthquake fault zone as determined by the State Geologist in any official maps published by the State Geologist, unless the development complies with applicable seismic protection building code standards adopted by the California Building Standards Commission under the California Building Standards Law (Part 2.5 (commencing with Section 18901) of Division 13 of the Health and Safety Code), and by any local building department under Chapter 12.2 (commencing with Section 8875) of Division 1 of Title 2.

(G) Within a flood plain as determined by maps promulgated by the Federal Emergency Management Agency, unless the development has been issued a flood plain development permit pursuant to Part 59 (commencing with Section 59.1) and Part 60 (commencing with Section 60.1) of Subchapter B of Chapter I of Title 44 of the Code of Federal Regulations.

(H) Within a floodway as determined by maps promulgated by the Federal Emergency Management Agency, unless the development has received a no-rise certification in accordance with Section 60.3(d)(3) of Title 44 of the Code of Federal Regulations.

(I) Lands identified for conservation in an adopted natural community conservation plan pursuant to the Natural Community Conservation Planning Act (Chapter 10 (commencing with Section 2800) of Division 3 of the Fish and Game Code), habitat conservation plan pursuant to the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), or other adopted natural resource protection plan.

(J) Habitat for protected species identified as candidate, sensitive, or species of special status by state or federal agencies, fully protected species, or species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code).

(K) Lands under conservation easement.

As such a list of excluded sensitive areas has become very typical for incentive programs. What is important to note is the drive by the legislature to minimize excluded areas as much as possible. PCL, along with many Roundtable participants, shares the interest in identifying the most streamlined list of sensitive lands to be excluded without jeopardizing essential natural resources or public health. With

accountable, up to date, mappable data, these map layers could serve as an efficient objective standard for determining where, and where not, to direct investment. OPR is currently developing a database of sensitive land mapping that could be used for this purpose, but hurdles remain. Many data sources, including the data from the Department of Toxic Substances Control (DTSC) to determine hazardous waste sites, are not up to date. Other questions remain on how to effectively address evolving climate change considerations in current data. The mapping of fire zones, flood plains, and areas subject to sea-level rise could be widely variable not only regarding climate, but also regarding local climate resiliency actions that have or have not been taken. The need for better data and mapping of endangered species habitat migration due to climate change has also been voiced.

For current funding program criteria, the Strategic Growth Council's (SGC) and the Department of Housing and Community Development's (HCD) Affordable Housing and Sustainable Communities (AHSC) and Infill Infrastructure Grant (IIG) guidelines are models for comprehensively handling questions the PCL Roundtable is considering. As an example of HCD's approach, below are excerpts of the IIG's 2019 applicable siting criteria. This includes a more nuanced characterization of "urban" in unincorporated areas:

Section 302. Definitions (Excerpts)

The following definitions apply to the capitalized terms used in these Guidelines:

- (j) "Large Jurisdiction" means a county that is not a Small Jurisdiction, or any city within that county.
- (t) "Qualifying Infill Area" means an area designated in the Program application that meets the criteria for a Qualifying Infill Area set forth in Section 303.
- (u) "Qualifying Infill Project" means a residential or mixed-use residential development project designated in the Program application that meets the criteria for a Qualifying Infill Project set forth in Section 303.
- (w) "Rural Area" has the meaning set forth in HSC Section 50199.21.
- (y) "Small Jurisdiction" means a county with a population of less than 250,000 as of January 1, 2019, or any city within that county.
- (bb) "Urbanized Area" means an incorporated city, or an Urbanized Area or urban cluster as defined by the United States Census Bureau, or an unincorporated area within an urban service area that is designated in the local general plan for urban development and is served by public sewer and water.
- (cc) "Urban Uses" mean any residential, commercial, industrial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses. Urban Uses do not include lands used for agricultural uses or parcels in excess of 15,000 square feet in size and containing only one single-family residence.

ARTICLE 2. PROGRAM REQUIREMENTS Section 303. Eligible Projects (Excerpts)

(a) To be eligible for funding, a Capital Improvement Project must be an integral part of, or necessary for, the development of either a Qualifying Infill Project or the housing designated in the application for a Qualifying Infill Area. The Qualifying Infill Project or Area must:

- (1) Be in an Urbanized Area.
- (5) Include average residential Net Densities on the parcels to be developed that are equal to or greater than the densities described in Gov. Code Subdivision (c), Paragraph (3), Subparagraph (B), Section 65583.2, except that in a Rural Area the average residential Net Densities on the parcels to be developed shall be at least 10 units per acre. Minimum densities for Localities that are not Rural Areas may be found in Appendix 1 of the housing element law memorandum issued by the Department and found at http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/Default_2010census_update.pdf.
- (6) Be located in an area designated for mixed-use or residential development (including areas where these types of development are allowable through a conditional use permit process) pursuant to one of the following adopted plans:
 - (A) A general plan adopted pursuant to Gov. Code Section 65300.
 - (B) A sustainable communities strategy adopted pursuant to Gov. Code Section 65080.
 - (C) A specific plan adopted pursuant to Gov. Code Section 65450.

- (D) Workforce housing opportunity zones established pursuant to Gov. Code Section 65620.
- (E) Housing sustainability districts established pursuant to Gov. Code Section 66201.
- (7) If within a Large Jurisdiction have any of the following:
 - (A) At least 75 percent of the area included within the Qualifying Infill Project or Qualifying Infill Area as previously improved (including areas where improvements have been demolished) or used for any use other than open space, agriculture, forestry, or mining waste storage; or
 - (B) At least 75 percent of the perimeter of the Qualifying Infill Project or Qualifying Infill Area adjoining parcels that are developed with Urban Uses or is separated from parcels that are developed with Urban Uses only by an improved public right-of-way. In calculating this percentage, perimeters bordering navigable bodies of water and improved parks shall not be included; or
 - (C) The combination of at least 50 percent of the area included within the Qualifying Infill Project or Qualifying Infill Area as previously improved (including areas where improvements have been demolished) or used for any use other than open space, agriculture, forestry or mining waste storage, and at least 50 percent of the perimeter of the Qualifying Infill Project or Qualifying Infill Area adjoining parcels that are developed with Urban Uses, or is separated from parcels that are developed with Urban Uses only by an improved public right-of-way. In calculating this percentage, perimeters bordering navigable bodies of water and improved parks shall not be included.
- (8) If within a Small Jurisdiction have any of the following:
 - (A) At least 50 percent of the area included within the Qualifying Infill Project or Qualifying Infill Area as previously improved (including areas where improvements have been demolished) or used for any use other than open space, agriculture, forestry, or mining waste storage; or
 - (B) At least 50 percent of the perimeter of the Qualifying Infill Project or Qualifying Infill Area adjoining parcels that are developed with Urban Uses or is separated from parcels that are developed with Urban Uses only by an improved public right-of-way. In calculating this percentage, perimeters bordering navigable bodies of water and improved parks shall not be included; or
 - (C) The combination of at least one-third of the area included within the Qualifying Infill Project or Qualifying Infill Area as previously improved (including areas where improvements have been demolished) or used for any use other than open space, agriculture, forestry or mining waste storage, and at least one-third of the perimeter of the Qualifying Infill Project or Qualifying Infill Area adjoining parcels that are developed with Urban Uses, or is separated from parcels that are developed with Urban Uses only by an improved public right-of-way. In calculating this percentage, perimeters bordering navigable bodies of water and improved parks shall not be included.
- (b) In addition, each Qualifying Infill Project must:
 - (1) Be a discrete development and all housing development components must have been planned as one development and jointly considered for local land use approval. They must also have common, affiliated or contractually related ownership and financing structures.
- (c) In addition, each Qualifying Infill Area must:
 - (1) Be a contiguous, coherent area treated as a discrete planning area in local planning documents and that does not contain extensions or satellite areas included solely to meet Program requirements; and
 - (2) If within a Large Jurisdiction have all the following:
 - (A) Include entirely within its boundaries a Qualifying Infill Project which meets the definition and criteria for a Qualifying Infill Project that has received all land use entitlements required for construction, or has a land use entitlement application pending before the appropriate jurisdiction, which application has been deemed to be complete pursuant to the Permit Streamlining Act (Gov. Code Title 7, Division 1, commencing with Section 65920) or a Nondiscretionary Local Approval Process as determined by a local land use authority (e.g., planning or community development director or zoning administrator), where applicable; and
 - (B) Include a Qualifying Infill Project that cannot contain more than 50 percent of the total housing units proposed for the Qualifying Infill Area.
 - (3) If within a Small Jurisdiction, have either the following:
 - (A) All housing development sites identified within the Qualifying Infill Area must be included in the inventory of land suitable and available for residential development identified in the currently adopted

housing element of the applicable city or county general plan that has been found by the Department to be in substantial compliance pursuant to Gov. Code Subdivision (a), Paragraph (3), Section 65583; or (B) The Capital Improvement Project must be supported by an environmental review, to make the area suitable and available for residential development, or to allow the area to accommodate housing for additional income levels.

We have included an example of these lengthy and complex criteria here to demonstrate precisely that complexity, which is the primary complaint regarding SGC's and HCD's guidelines. While we find that AHSC, IIG, and TOD guidelines do indeed address issues we seek to find solutions for across incentive programs more comprehensively, there is great interest in these agencies providing more uniform and more simplified criteria across these programs. With greater consistency and simplification, these well-thought-out criteria, which have been publicly revised in multiple iterations, could provide a more effective model to emulate across state and local funding and incentive programs.

PCL's Previous Recommendation for an Optimal Infill Definition

AB 1804 (2018), initially attempted to extend the Class 32 infill exemption described above to unincorporated areas, but there was a deep concern for applying such an exemption to counties with such vague criteria. The final provisions that were passed and enacted are included in the attached OPR Technical Advisory on Housing and CEQA (Appendix B)—below is the language PCL had recommended, which, at the time, we thought would be the optimal criteria for a CEQA exemption. PCL also advocated that basic inclusionary and anti-displacement criteria (similar to that in SB 35) should also be required. These equity recommendations were not ultimately agreed to, nor were the siting criteria below. The existing Class 32 code is in black, PCL's recommendations are in green:

SECTION 1. Section 21159.25 is added to the Public Resources Code to read: Except as provided in subdivision (k), Division 13 of the California Public Resource Code does not apply to a project if all of the following criteria are met:

(a) The project is a residential or mixed-use project, consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

(b) The proposed development occurs ~~within city limits~~ on a project site of no more than five acres ~~substantially surrounded by urban uses~~ and meets all of the following criteria:

(1) The site is a legal parcel or parcels located wholly within the boundaries of an urbanized area or urban cluster, as designated by the United States Census Bureau.

(2) The site has been previously developed for qualified urban uses, or the site has not been previously developed for urban uses and both of the following apply:

(A) The site is 100 percent adjoined to parcels that are developed with qualified urban uses, or at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses, and the remaining 25 percent of the site adjoins parcels that have previously been developed for qualified urban uses. For the purposes of this section, parcels that are only separated by a street or highway shall be considered to be adjoined.

(B) No parcel within the site has been created within the past 10 years unless the parcel was created as a result of the plan of a redevelopment agency.

(C) Notwithstanding Section 21072 of the California Public Resource Code, for the purposes of this section housing of less than one unit per acre is not a qualified urban use.

(3) The site is zoned for residential use, or residential mixed-use development with at least two-thirds of the square footage designated for residential use.

~~(c) The project site has no value as habitat for endangered, rare or threatened species.~~

(c) The project satisfies the criteria of Section 21159.21 .

(d) Within five years of the date that the application for the project is deemed complete pursuant to Section 65943 of the Government Code , community-level environmental review was certified or adopted.

~~(d)~~ (e) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

(f) The project demonstrates a projected Vehicle Miles Traveled performance of at least -15% of regional average.

The PCL recommendation on AB 1804 combined multiple past approaches to defining infill, some of which have been discussed above. We added the requirement that the site must fall within a community-level plan and that community-level review must be completed, similar to PRC 21159.24 and other similar exemptions. We included the more comprehensive list of sensitive lands, PRC 21159.21, also used in PRC 21159.24 and other exemptions. We added the distinction that residential housing of less than one unit per acre may not be permissible as a “qualified urban use” for the project’s perimeter.

Most notably, we combined the “...100% adjoined to...existing urban uses...” provision of SB 375 with the census-defined “urbanized area” provision of SB 35, including the unincorporated area. When SB 226 and SB 35 reduced the 100% criteria to 75%, PCL argued against it on the premise that 75% opens applicability to greenfield development at the urban periphery. Until recently, PCL believed that no amount of greenfield development should be allowed a CEQA exemption, nor any incentives. PCL has felt that this is particularly important in unincorporated rural areas, due to the relative potential proximity to sensitive natural lands. But after years of hearing builders and rural housing advocates argue that even 75% is far too restrictive in rural areas, PCL has begun to question its position on boundary conditions. Similarly, as PCL has advocated strongly for use of the census definition of urbanized area in recent years, we now also question the efficacy of the census mapping. Our desire to seek new answers for these basic questions regarding the definition of infill is precisely why we have initiated this analysis.

A New “Location Efficiency” VMT Performance-Based Approach

A primary takeaway from this initiative is that there is little interest in trying to correct the many inconsistencies of past site-criteria/boundary-condition approaches to defining infill, and little faith that answers to the many questions these past approaches raise could be found to adequately address varying conditions across urban, suburban, and rural contexts.

There is great cross-sector interest in developing a new approach to appropriately identifying areas for development which can achieve California climate and equity goals, while allowing greater flexibility to localities than a site-specific-criteria approach provides.

Over the past decade, there has been an emerging notion of “transportation efficiency” or “location efficiency” to gauge the appropriateness of development concerning California’s climate and equity goals. These terms mean different things to different people. “Efficiency” in land use and transportation terms generally refers to housing’s relative proximity to jobs and essential services or access to transportation options to those jobs and services. While there have been various approaches to evaluating “location efficiency,” a standard definition or methodology for determining transportation/location efficiency has not been established.

A VMT performance-based criterion approach has the potential to be a viable and simple option for defining location efficiency. “VMT reduction” is a very good proxy metric for GHG reduction from improved land use and transportation, but also for the many co-benefits to natural resource conservation, public health, and social equity that such improved land use can provide.

PCL’s final recommendation on AB 1804 above, subparagraph (f), was to provide that the project have a projected VMT performance of -15% of the regional average. This recommendation was to acknowledge the newly adopted CEQA guidelines for VMT per SB 743 (2013).

SB 743 mandated that the Office of Planning and Research develop a transportation impact methodology to replace traditional auto-only “Level of Service” analysis. The [Guidelines](#) for this new multi-modal VMT-based methodology were adopted by the Natural Resources Agency in 2018, separating VMT from GHG as a distinct impact. Jurisdictions are required to begin implementing this new methodology in 2020, and most land use and transportation projects must now be analyzed through this new lens.

Under the new CEQA guidelines, jurisdictions are required to adopt their own Thresholds of Significance (TOS) for VMT and their own methods for mitigating VMT impacts. However, OPR offers recommendations for both thresholds and mitigation options in the [SB 743 Technical Advisory](#) which are calibrated to meet the needed VMT reductions identified by the CA Air Resources Board (CARB) in the [2017 Scoping Plan Update](#) to meet our 2050 GHG reduction goals.

OPR recommends that all land-use projects demonstrate, or mitigate to, -15% regional or city average per capita VMT, and that all transportation projects must demonstrate, or mitigate to, no-net per capita VMT increase (this controls for projected absolute-VMT increases due to population growth). For the purposes of identifying areas that would be exempt from conducting transportation analysis and/or places to direct VMT mitigation to, OPR suggests these parameters:

- Half-mile around an existing major transit stop
- Half-mile around an existing high-quality transit corridor
- “Low VMT areas” or “Green Zones,” areas that currently demonstrate -15% below regional average or city average of per capita VMT

In exploring how these parameters and the “Low-VMT Zone” definition of transportation efficiency could be applied, not only for SB 743 implementation but more broadly as a standard for directing incentives and investment generally, PCL collaborated with the Center for Neighborhood Technology (CNT) to conduct statewide VMT performance analysis in the development of a “California Infill Index.”

Center for Neighborhood Technology California VMT Performance Analysis Infill Index:

This summary provided by CNT, see Appendix C for the data table statewide VMT performance per jurisdiction and [link](#) for the entirety of CNT's mapping analysis and methodology.

As California seeks to meet the twin challenges of housing affordability and climate change, the location efficiency of new housing development is coming into greater focus. The Center for Neighborhood Technology (CNT) has developed an Infill VMT Index that maps the relative performance of places in California based on household vehicle miles traveled (VMT). We have also mapped race, ethnicity, and other socioeconomic factors, because development in California must protect vulnerable communities and prevent displacement. Maps of other considerations, such as environmentally sensitive lands, public parks, contaminated lands, and wildfire risk are available from public agencies and should be consulted when considering suitability for infill.

Infill VMT Index

The Infill VMT Index is based on a model developed by CNT using California Household Travel Survey data.¹ The Index uses the spatial variables of CNT's California VMT model, specifically:

- Employment Density – Density of jobs recorded in the 2015 U.S. Census Longitudinal Employer-Household Dynamics (LEHD) data within a half-mile of the household (expressed as jobs/acre).
- Transit Availability – The number of transit vehicle runs (in each direction) stopping within a half-mile of the household in a typical week from on CNT's [AllTransit™ database](#) as updated in 2019.

VMT performance in the Index is scaled from 0-100, with 100 being a high-performing infill place (where VMT is relatively low) and 0 being a low-performing infill place (where VMT is high relative to all places in the state). Figure 1 shows a statewide view of the Infill VMT Index.

¹ For more details on the model see this previous work, Gregory L. Newmark Ph.D. and Peter M. Haas Ph.D., Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy, December 2015. <https://www.cnt.org/publications/income-location-efficiency-and-vmt-affordable-housing-as-a-climate-strategy>

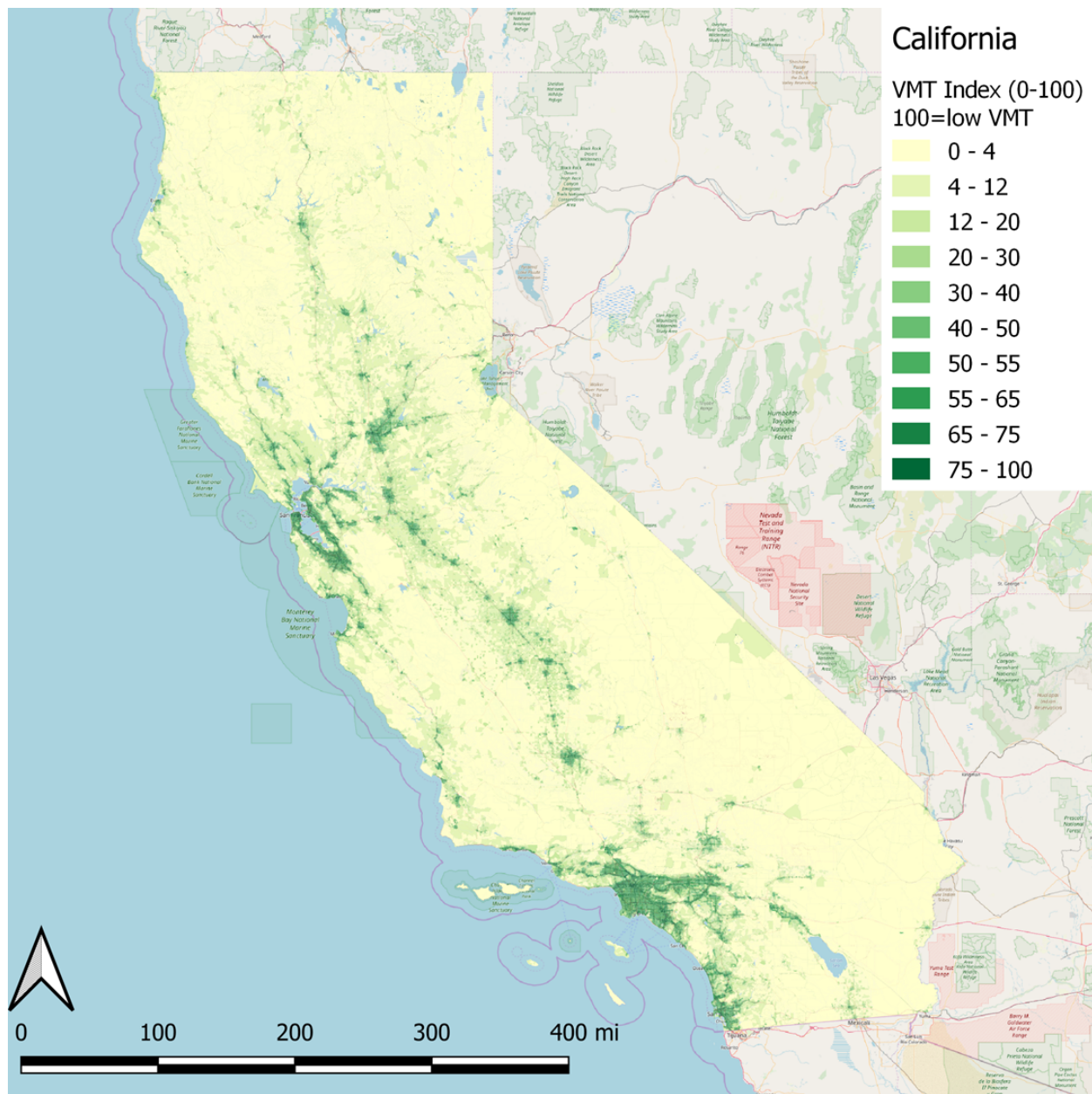


Figure 1. CA Infill VMT Index

Figures 2 and 3 show detailed views of the Infill VMT Index in Sacramento and Redding.²

- Sacramento has an average Infill VMT Index value of 56 on the scale of 0-100, and 2% of the land area in the city scores over 75 on the index (indicated by the darker green areas of the map in Figure 2 where VMT is lower relative to other places).
- Redding has an average Infill VMT Index value of 45 on the scale of 0-100. Notice in Figure 3 that Redding, although it has a somewhat limited transit service, still has a significant variation in relative VMT performance within the community.

² More maps of the Index, as well as the employment density and transit availability elements are in the September 2019 CNT presentation "California VMT Model Spatial Variables."

VTM Index Value

Census Blocks	20 - 30	50 - 60	80 - 90
0 - 10	30 - 40	60 - 70	90 - 100
10 - 20	40 - 50	70 - 80	

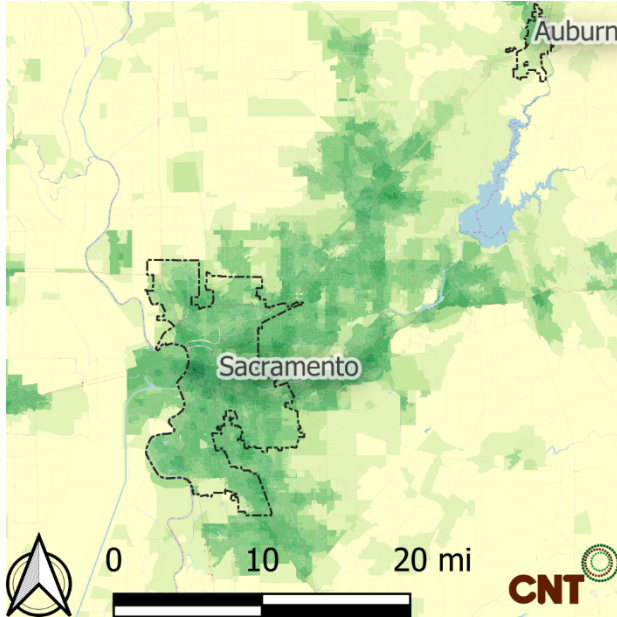


Figure 2. Infill VMT Index Sacramento

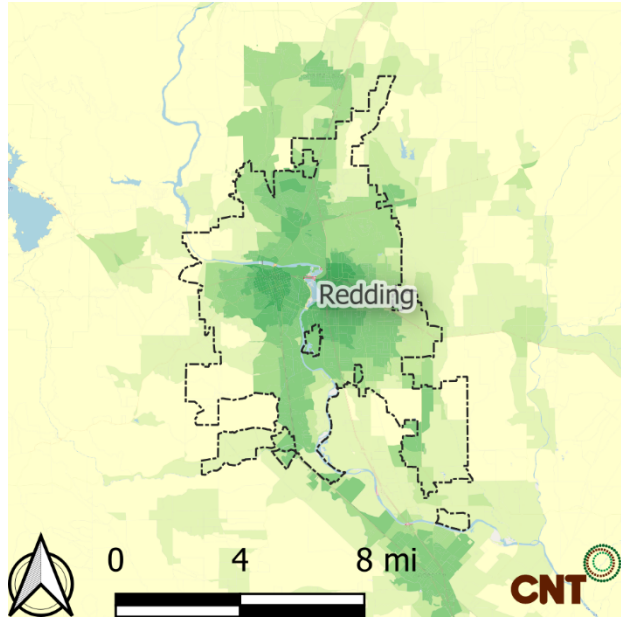


Figure 3. Infill VMT Index Redding

VTM Performance

The Infill VMT Index uses spatial variables and essentially holds the household type constant. Thus, it is an indicator of relative VMT performance, but not of VMT itself. CNT's VMT model shows that while spatial variables play a big role in shaping the relative VMT performance of a place, different households living in the same location will drive different amounts. On average, smaller households with less income will drive less than large households with high incomes. To demonstrate this, we conducted two runs of our model with two different household types.

Figures 4 and 5 show the results of this for Fresno:

- Fresno has an average Infill VMT Index value of 51 on the scale of 0-100. In both Figures 4 & 5, VMT performance varies across the city; households in the outer parts of Fresno drive more on average than households in the central area.
- Figure 4 on the left shows the VMT that a 4-person, middle-income household with 2 children would drive each year in different parts of Fresno according to our model.³ On average, a household of this type drives 14,222 miles per year in Fresno.

³ More maps of VMT based on these two housing types are in the September 2019 CNT presentation "Modeled VMT for Two "Control" Households."

- Figure 5 on the right shows the same Fresno area modeled for a 3-person low-income household with 2 children. On average, a household of this type drives 7,971 miles per year—significantly less than the larger household with more income.

The VMT difference between the middle-income and low-income households shown here indicates the importance of household and housing type when considering housing location and climate performance. From an equity standpoint, it should be noted that the higher VMT areas are typically associated with higher transportation costs as well, which can be a major burden to lower-income households.⁴

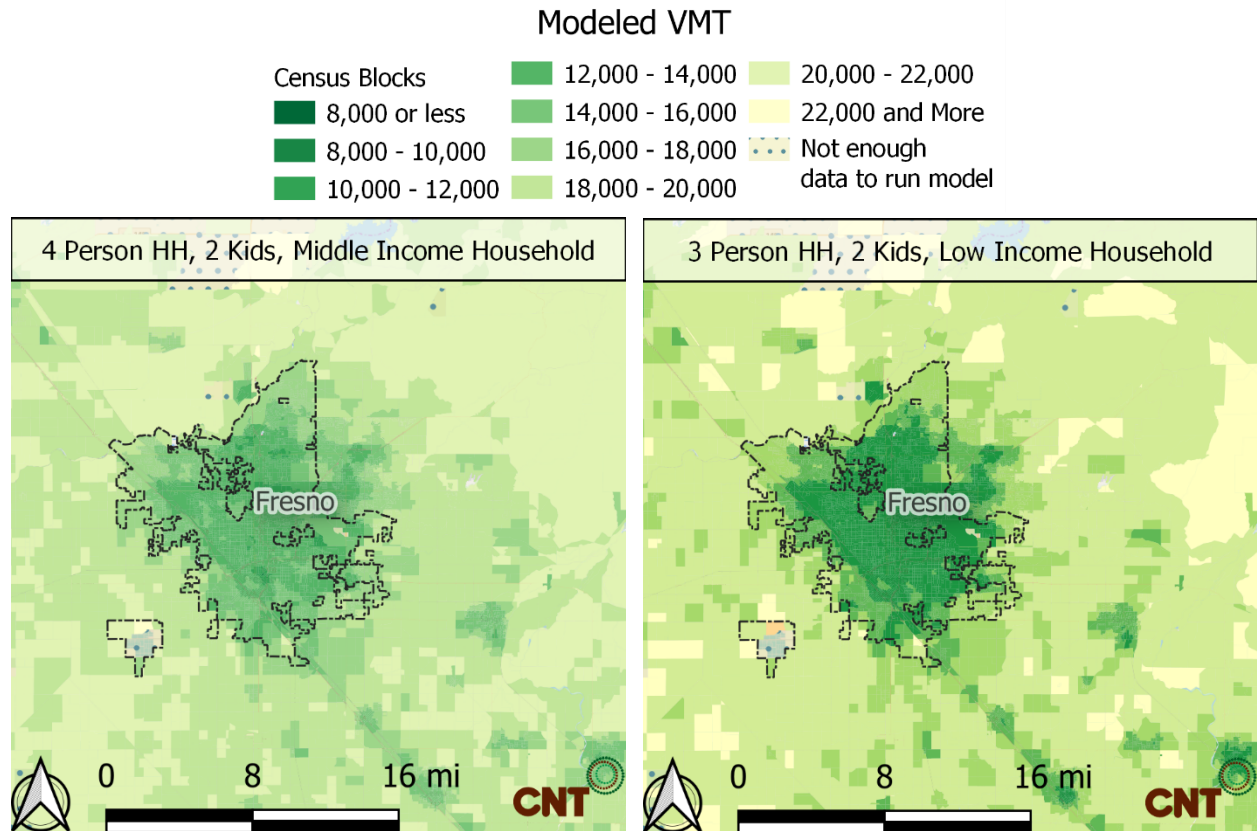


Figure 4. VMT for a 4-Person, Middle-Income Household in Fresno

Figure 5. VMT for a 3-Person, Low-Income Household in Fresno

Socioeconomic Factors

As California seeks to address VMT it also has equity principles that demand its housing policies protect vulnerable communities from displacement. To examine equity in the context of the Infill VMT Index, we mapped the following five socioeconomic factors used in CalEnviroScreen 3.0:⁵

⁴ For more information on this see CNT's Housing + Transportation Affordability Index, which uses a slightly different model than the one presented here because it is national in scope <https://htaindex.cnt.org/>.

⁵ Data Sources: U.S. Census American Community Survey 5-year estimates 2012-2017 and Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) 2016

- Educational Attainment – percent of the population over age 25 with less than a high school education.
- Housing Burden – percent of households in a census tract that are both low income (making less than 80% of their county's median family income) and severely burdened by housing costs (paying greater than 50% of their income for housing costs).
- Linguistic Isolation – percent of limited English-speaking households, which are households where no one over age 14 speaks English well.
- Poverty – percent of the population with incomes less than two times the federal poverty level.
- Unemployment – percent of the population over the age of 16 that is unemployed and eligible for the labor force.

A percentile is assigned to each of these factors and all five are averaged to create an index.

Figure 6 shows these socioeconomic data mapped for the Los Angeles area. The darkest green areas are those that face high socioeconomic burdens. Figure 7 shows the socioeconomic factors statewide.⁶

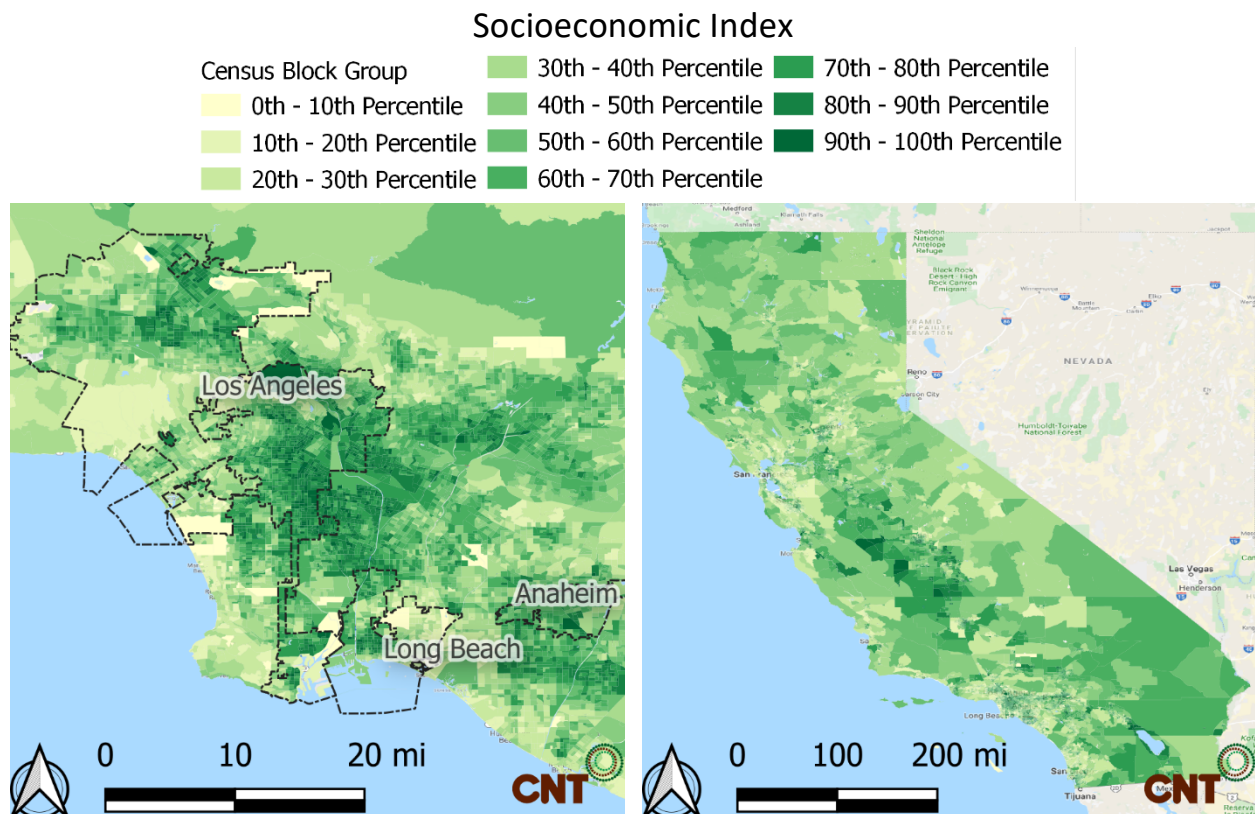


Figure 6. Socioeconomic Factors Los Angeles

Figure 7. Socioeconomic Factors California

⁶ More maps of the Socioeconomic Factors are in the September 2019 CNT presentation, "Socioeconomic Factor Indicators Similar to CalEnviroScreen 3.0."

Race and Ethnicity

CalEnviroScreen 3.0 does not include race or ethnicity in its demographics, but race and ethnicity are important factors in assessing communities that may be vulnerable to displacement. Therefore, we have mapped the percent of the population that is self-identified in the U.S. Census American Community Survey as 1) Hispanic/Latino or 2) not as white alone. To align with the other elements in this work we have assigned percentiles to these data.

Figure 8 shows these race and ethnicity data mapped for the Los Angeles area. The darkest green areas are those with a high share of residents that identify as Hispanic/Latino or not as white alone. Comparing to Figure 6, one can see there is not a perfect alignment to the CalEnviroScreen 3.0 Socioeconomic Factors, indicating the importance of considering this wider dataset. Figure 9 shows the race and ethnicity factors statewide.⁷

Race and Ethnicity: Hispanic/Latino or not white alone

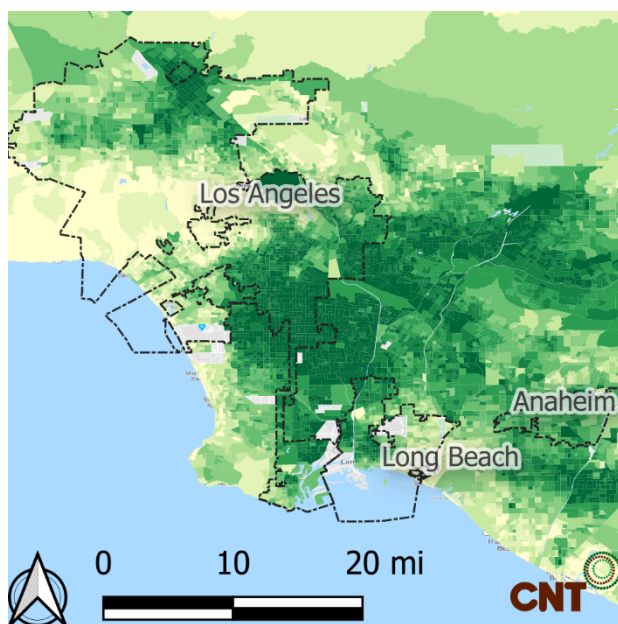
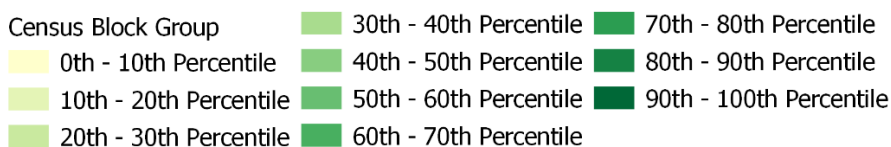


Figure 8. Race and Ethnicity Los Angeles

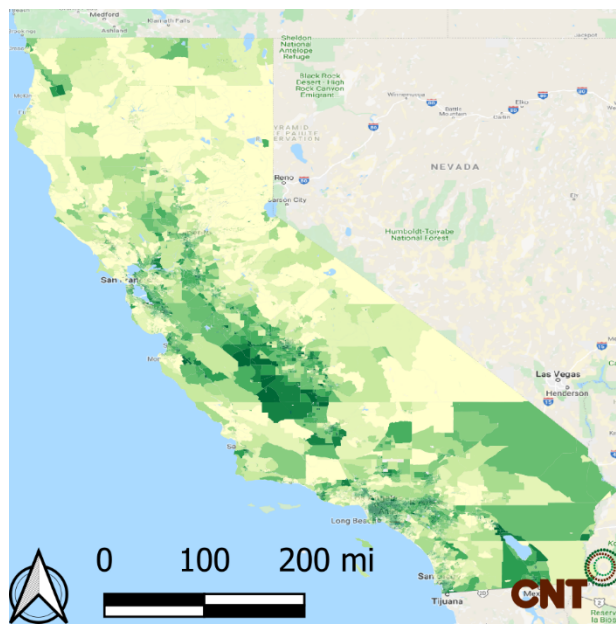


Figure 9. Race and Ethnicity California

⁷ More maps of race and ethnicity are in the September 2019 CNT presentation, “Socioeconomic Factor Indicators Similar to CalEnviroScreen 3.0.”

Development Patterns

California's development patterns of the past several decades have not followed the low-carbon, low-VMT goals that we now have for our state. For example, Elk Grove is a community with a lot of newer housing. When comparing the median age of housing in Elk Grove and its surrounding area in Figure 10 with the Infill VMT Index in Figure 11, one can see that housing has recently developed in areas with low Infill VMT Index scores, indicating that those households are likely to have higher VMT than if they were located in more location efficient parts of the community.

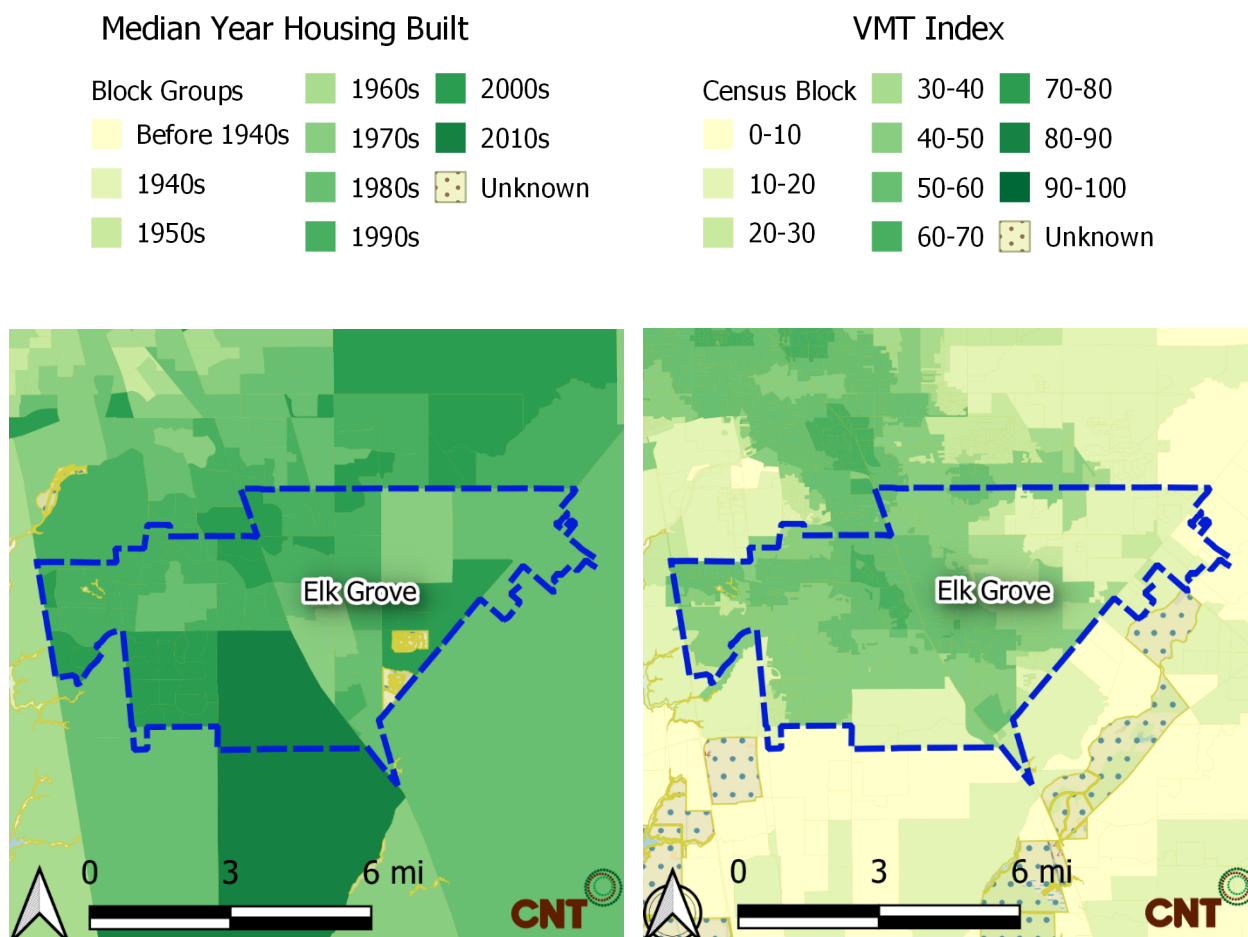


Figure 10. Median Housing Age Elk Grove

Figure 11. Infill VMT Index Elk Grove

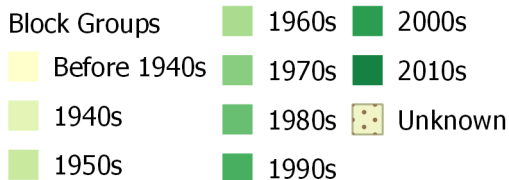
Similar patterns can be seen in other communities we examined as case studies, including Fresno and San Diego.⁸

Recent development in the Uptown neighborhood of Oakland aligns with high performing areas of the community in the Infill VMT Index, as Uptown has the benefits of both nearby employment and transit availability. However, the housing affordability and displacement

⁸ More maps of these case studies are in the November 2019 CNT presentation, "Case Studies of Four Municipalities."

impacts Oakland faced in recent years demonstrates the equity factors associated with any development should be carefully considered and affordable housing for existing residents should be a priority.

Median Year Housing Built



VMT Index

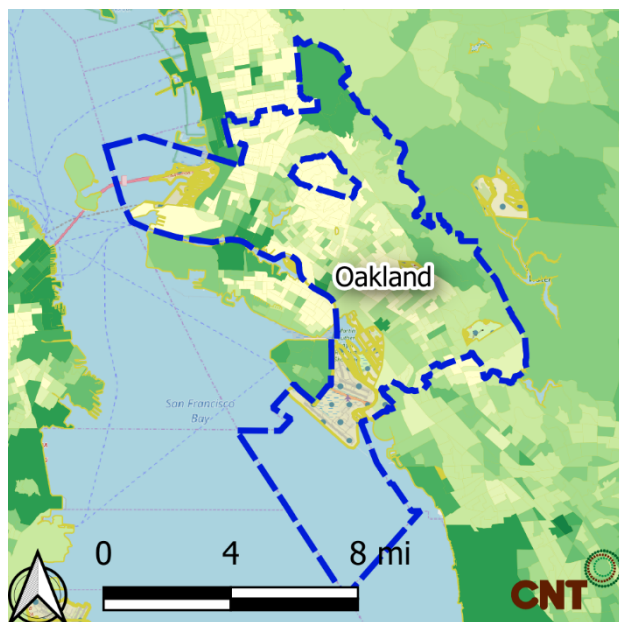
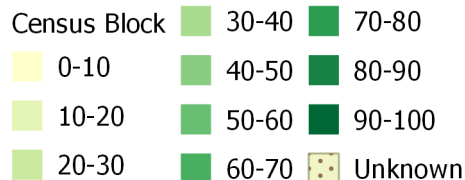


Figure 12. Median Housing Age Oakland

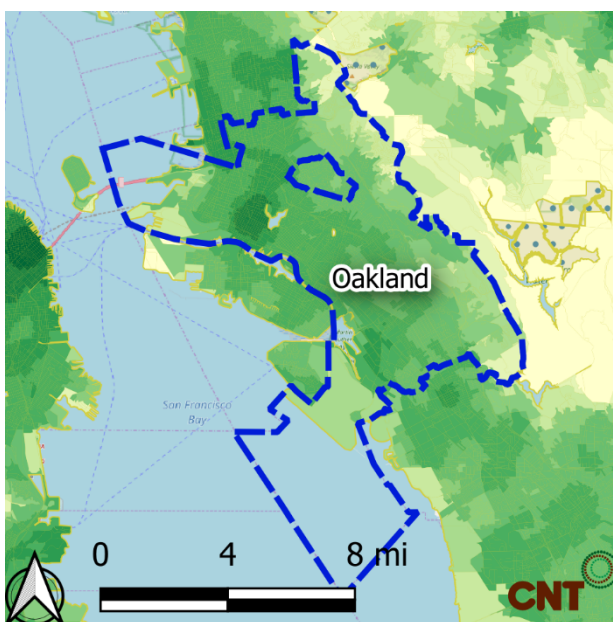


Figure 13. Infill VMT Index Oakland

Conclusion and Next Steps (see also pg. 54)

The Infill VMT Index developed by CNT indicates the relative VMT Performance in California communities, and indicates places where additional housing can provide households with access to jobs and/or transit in a way that has the potential to help California meet its climate action goals. To truly meet our goals, the Infill VMT Index should be considered along with household characteristics, including housing type, race, ethnicity, and other socioeconomic factors of current residents to reduce the risk of displacement and ensure that we do not exacerbate equity issues as we seek to solve our housing and climate crises.

Infill Definition Recommendations:

While definitive agreement on the ideal definition of infill remains to be seen, there is broad consensus among the Roundtable participants that past approaches are insufficient. Approaches which emphasize prescriptive boundary conditions, densities and uses are too restrictive to address widely varying local conditions and community types or to effectively incent the kind of development we need to meet California's climate, equity, and housing goals. Further, it is also recognized that most past approaches are particularly restrictive to small rural communities, as well as low-density suburbs that also could benefit from improved land use and densification.

A new standard of measurement for infill incentives is clearly desired: one that effectively protects our environment and public health, but also allows for greater flexibility to local jurisdictions on specific siting criteria.

Previously, PCL's views on "infill" were governed by a belief that no previously undisturbed land should qualify for streamlining or infill incentives. PCL's perspective has now shifted to acknowledge that the preoccupation with prescribing specific siting criteria to inhibit greenfield development also, in turn, inhibits what could be quality, efficient development in logical places. Particularly, the limiting of CEQA streamlining with such prescriptive siting criteria can also empower "Not-In-My-Back-Yard" (NIMBY) challenges to higher densities and mixed-income development, one of the primary barriers to quality infill. It is now clear to PCL that the benefits of encouraging infill by loosening specific siting restrictions far outweigh the potential losses of allowing for some greenfield development in efficient areas, so long as sensitive lands necessary to protecting the environment and public health are strictly excluded.

CNT's statewide VMT performance analysis and VMT-based Infill Index provided us with insights, which not only support the concept of a VMT-threshold as an adequate gauge of "infill," but also that a VMT-based approach could offer pathways to address the particular needs for affordable housing and rural communities.

Given the CNT analysis and input from the Roundtable, PCL is more convinced than ever that directing investment through the lens of "location efficiency," based on OPR's recommendations for low-VMT thresholds, is the most viable option to establish a new standard for the broad application of infill incentives.

Draft Infill Definition Recommendations

PCL proposes that infill should be primarily defined by VMT performance:

- All incentive programs for infill development and infrastructure should be directed exclusively to low-VMT Green Zones. Green Zones can be either less than 85% of regional average or city average per capita VMT. The VMT-defined threshold for defining “infill” is regardless of other perimeter specifications for adjacency to other urban uses, and regardless of whether the area is incorporated. (See example of Regional VMT mapping below, pg. 29)
- Absent any local siting criteria or restrictions, areas excluded from applicability will be governed by iteratively updated statewide mapping of a to-be-determined list of sensitive areas essential to protecting public health and safety and the environment. (See proposed list, pg. 28)
- Areas within a half-mile of a “high-quality transit stop” as currently defined (PRC 21064.3, PRC 21155) qualify as a Green Zone. A planned transit stop only qualifies if it is part of an adopted short-term (5-year or less) Transportation Improvement Plan (TIP).
- Incentives granted to Green Zones, may also be granted to Yellow Zones (85%-100% regional or city average) if projected VMT of the project can be demonstrated to be below 85% of regional or city average in an initial study.
- Orange and Red Zones (100%-115% and greater than regional or city average, respectively) should (in most cases) not be applicable for incentives.

Special Conditions for Further Consideration:

Rural and Suburban

- The CNT analysis illustrates that small cities and even smaller unincorporated rural communities can have very good VMT performance when the appropriate mix of uses and incomes is present.
- The intention is that a broader range of these communities can be captured by incentive programs in allowing the city-average Green-Zone VMT option to regional-average. More analysis is needed to determine the proportion of rural and suburban communities that are not captured by the city option and if further allowances for rural communities can or should be determined.
- Further analysis of nontraditional transit options is also needed to determine ways that the half-mile radius of transit stop parameters could be appropriately applied in suburban and rural communities that lack high-quality transit (e.g., coordinated shared mobility service to fixed transit, and emerging vanpool programs).

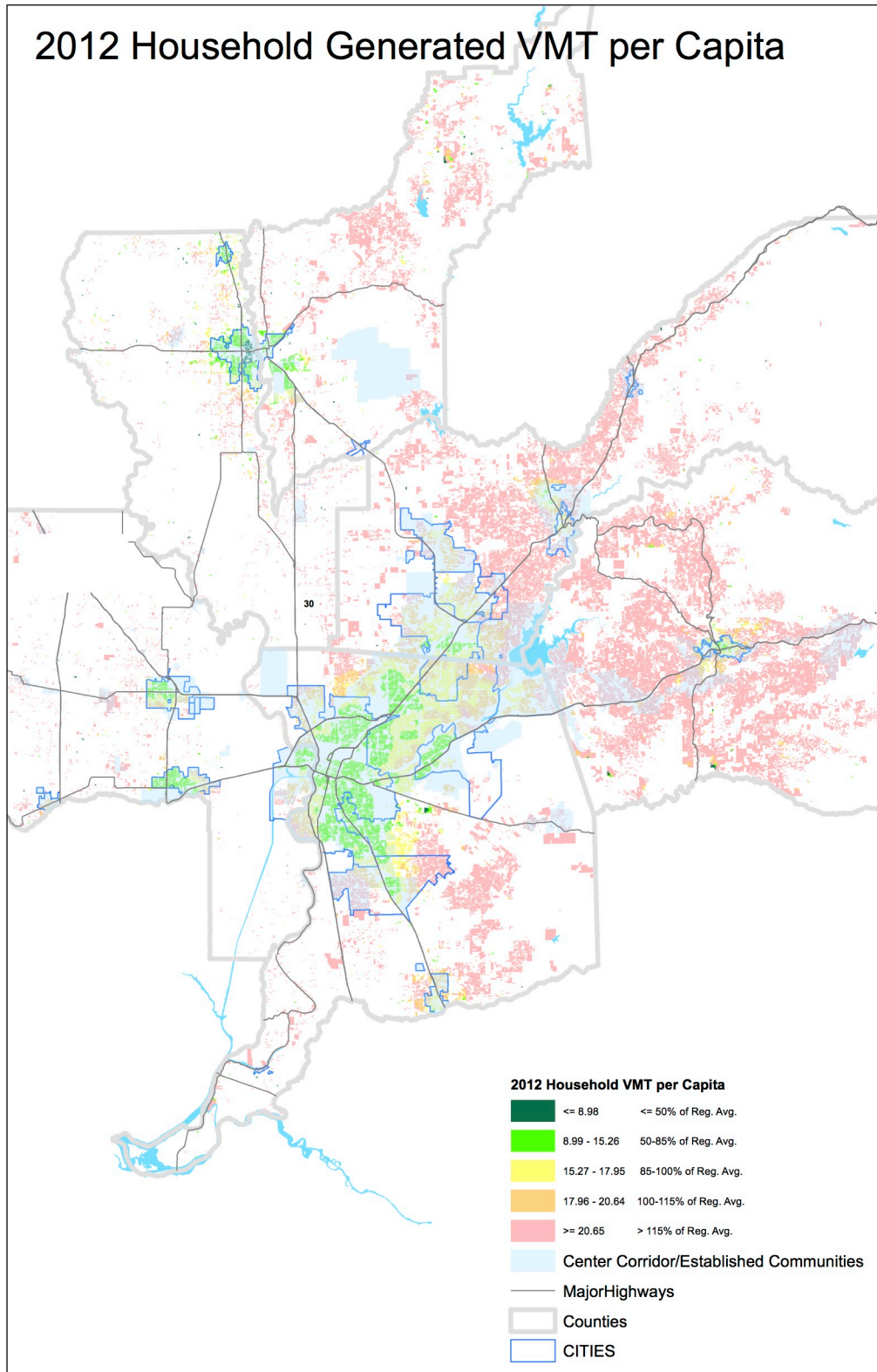
- By allowing the Yellow Zone to be applicable with an initial transportation analysis, it is hoped that this can encourage development in places that could meet more transit-friendly densities, or otherwise reduce VMT with a greater mix of uses and local services.
- AHSC location efficiency scoring criteria and the “Walkability Index” (see pg. 38) could also be explored for broader application of incentives in rural and suburban communities beyond the Green Zones.

Affordable Housing

- CNT’s analysis also illustrates that low-income households can have significantly lower VMT on average than higher income households. The implications of this are not only that low-income housing in location-efficient places is a viable VMT reducing strategy, but also that low-income housing might also have a wider “Green Zone” footprint. More analysis is needed to explore the development of a separate “Affordable Housing Green Zone” for affordable housing incentives.
- AHSC location efficiency scoring criteria and the “Walkability Index” (see pg. 38) can also be informative and important for determining equitable access to jobs, services, and transportation options. This serves the purpose of effectively targeting funding for equitable housing within green zones. Further exploration of how these additional efficiency criteria could be employed to illuminate opportunities for mixed-use suburban development and particularly for small rural communities. (Again, with this additional analysis, a yellow zone could become a green zone).

Sensitive Lands

- Further discussion is needed to determine the optimal list of essential sensitive lands that should be excluded from incentive applicability to ensure the protection of fundamental environmental resources and public health.
- As a starting point, PCL proposes that the essential short list of excluded lands could include but not be limited to: habitat for endangered, rare or threatened species; farmland of statewide and local importance; wetlands; earthquake/seismic hazard zones; federal, state, and local preserved lands, NCCP and HCP plan areas, and conservation easements; riparian areas; Department of Toxic Substances Control (DTSC) facilities and sites; landslide hazard, flood plains and, floodways; wildfire hazard as determined by the Department of Forestry and Fire Protection
- DTSC data for hazardous sites needs to be centralized and updated to a degree that it can be accountably mapped. Further consideration is needed of how and what changing landscape characteristics due to climate change could also be mapped, along with consideration of changing local and state climate resilience regulations and actions
- Further, protocols are needed for development and iterative updating of mapping for sensitive lands if the mapping is to be a responsible and objective standard for guiding investment.
- Until such time that such protocols are in place for the upkeep of a compiled database of sensitive-lands mapping, PCL recommends that an initial study is required for incentives limited to illustrating compliance with required sensitive-lands restrictions (in addition to a VMT analysis in Yellow Zones).



SACOG Regional Average VMT Map

Analysis: Equity, Affordability and Anti-displacement Provisions

As stated earlier, while not necessarily a shared view of all our Roundtable participants, PCL's perspective is that to meet California environmental and climate goals, we must direct as much investment towards infill development and infrastructure as feasible. However, we also recognize infill investment inevitably adds to gentrification and displacement pressures on low-income residents in these existing communities. Thus, to meet our environmental, climate *and* equity goals, this infill investment must also be coupled with inclusionary and anti-displacement protections to guard against the perpetuation of historical patterns of segregation, to ensure vulnerable residents equitably reap the benefits of these investments, and to ensure our ability to meet our climate goals is not undermined by forcing low-wage workers into long commutes.

In 2018, PCL and many other cross-interest organizations participated in a process conducted by ClimatePlan to develop an "Investment Without Displacement" policy platform. We first sought shared definitions of what "investment" and "displacement" mean, and then identified a set of principles that could guide policy to protect against displacement caused by our investment in existing communities. See Appendix D for the entirety of this document. Below are the nine principles that emerged from this dialogue.

For the second round of input for the PCL Roundtable, we proposed to use the ClimatePlan collaborative's platform as a starting point for the discussion.

Excerpt from the ClimatePlan Investment Without Displacement Collaborative Recommendations:

The following nine principles guide our analysis of proposed policies to ensure they achieve investment without displacement. The signatory organizations to this document endorse these principles as overall goals which campaigns, legislation, investments, and policy proposals should strive to incorporate based on context, scope, and specific situations. The organizations signing onto this document commit to giving these recommendations weight as they evaluate such proposals and arrive at specific positions.

1. All renters should be protected from excessive rent increases through local, regional, and/or statewide rent stabilization.
2. Market-rate housing developers should not receive a public incentive (such as streamlining, reduced parking requirements, reduced open space requirements, etc.) for housing development that displaces existing households or demolishes homes that are occupied by, or are affordable to, lower-income tenants. The state should not displace existing households or demolish them.
 - However, exceptions should be considered where:
 - a. New development results in a *significant increase* in the number of homes affordable to lower-income renters, and
 - b. Existing residents are fairly relocated at the developer's cost to comparable housing in near proximity and given the right to return to the new development in comparable units at their original rent level.

3. All renters should be protected from unwarranted eviction through a statewide “Just Cause” law. The Ellis Act, which allows landlords to evict residential tenants under the premise of “getting out of the rental business,” must also be reformed.
4. The state needs to significantly increase state funding to preserve existing homes affordable to very low-income Californians and build new homes they can afford.
5. Any residential developer who takes advantage of public incentives that increase a property's value or decrease development costs must use a portion of that financial windfall to benefit the community by including extremely and very low-income affordable homes in the new development.
6. Major public investments should provide capacity-building and technical assistance for local community-based nonprofit organizations and institutions, so they can compete for contracts or grants related to the investment.
7. Major public investments should also provide assistance to local and disadvantaged residents in the form of career development, apprenticeship, and employment opportunities in both construction and any permanent jobs created by the investment.
8. All major investments should include meaningful community participation in every aspect of project design.
9. All new multi-family housing of 10 units or more developed near transit or benefitting from other public resources should include extremely and very low-income affordable homes, on-site or off-site in near proximity.

Questions:

For PCL's second Roundtable we grappled with the challenge of how to translate the above nine principles into specific inclusionary and anti-displacement criteria for infill development incentives. In consideration of what optimal equity criteria, or menu of criteria, should be required for infill incentives for differing rural, suburban, and urban contexts, the following questions emerged:

- What is the appropriate inclusionary standard that should be met for an incentive?
 - What proportion of Low, Very Low, and Extremely Low-income housing should be required? Should moderate-income housing be allotted incentives as well?
 - Is the answer different for a singular project vs. an area plan (EIFD, Transit Priority Area or low-VMT zone, etc.)?
- When are in-lieu fees for inclusionary housing appropriate? When are they not?
- Should demolition of housing be allowed? What is the appropriate level of restriction on demolition?
 - If no-demolition of housing for incentives was the standard, do conditions exist that would allow for exceptions?
 - If so, what should the appropriate requirements be for a project to mitigate that loss of housing?
 - Is no net loss of equivalent and/or affordable housing enough?
 - If not, how much is a "significant increase" in affordable housing?
 - What is the appropriate required level of relocation assistance and first-return benefits?
- With basic just-cause eviction and anti-rent gouging protections now required statewide by AB 1482 (2019), should a higher standard of tenant protection be expected for an incentive?
 - If so, what would that higher standard look like?
- Beyond housing, can similar inclusionary and anti-displacement protections be applied to local businesses and commercial space?
 - If so, what would be the appropriate standard?
- Should a basic determination of jobs-housing fit or location efficiency to essential services be required?
 - What would be the methodology for determining the appropriate mix of uses within a project, or within the project's neighborhood?
- Where an increase in density over existing conditions is occurring, should a basic mechanism for value-capture of the increased land value be required to be used for affordable housing and/or needed infrastructure or other community benefits?
 - If so, what is the appropriate percentage of that increased land value to be captured?
 - Would such a mechanism be applied in addition to, or in exchange for, the more explicitly prescriptive requirements discussed above?
 - What would be the methodology for determining appropriate uses of that captured value for "community benefit"?

Existing Legislative and Regulatory Examples:

Inclusionary Requirements:

As with infill definitions, there are many different approaches to inclusionary requirements for mixed-income and affordable housing that vary greatly across our streamlining provisions, funding guidelines, and local ordinances. In recent years, however, in response to the extreme affordability crisis that California is currently experiencing, many new approaches to accommodating affordable housing in incentive programs have emerged. Here we present a selection of these recent examples that have been at the forefront of housing discussions in the capitol.

Again, SB 35 (2017) was the centerpiece of the housing debate in 2017 and has been emulated in ensuing approaches to housing legislation. To qualify for ministerial by-right approval, SB 35 requires that at least 10% of units in an individual housing or mixed-use project be affordable to “low-income” households making 80% Area Median Income (AMI) for jurisdictions that have not met their Regional Housing Needs Allocation (RHNA) for above-moderate housing. This requirement increases to 50% in jurisdictions that have not met their RHNA for low-income housing. At the time, housing advocates, including PCL, were advocating that a 5% requirement for “very low income” household units (50% of AMI) be included in addition to the low-income requirement, but this provision was dropped from the final legislation.

SB 35 (2107): Section 65913.4 (a)(4)(B) of the Government Code, project requirements:

(B) The development is subject to a requirement mandating a minimum percentage of below market rate housing based on either *one* of the following:

(i) The locality did not submit its latest production report to the department by the time period required by Section 65400, or that production report reflects that there were fewer units of above moderate-income housing approved than were required for the regional housing needs assessment cycle for that reporting period. In addition, if the project contains more than 10 units of housing, the project seeking approval dedicates a minimum of 10 percent of the total number of units to housing affordable to households making below 80 percent of the area median income. If the locality has adopted a local ordinance that requires that greater than 10 percent of the units be dedicated to housing affordable to households making below 80 percent of the area median income, that zoning ordinance applies.

(ii) The locality did not submit its latest production report to the department by the time period required by Section 65400, or that production report reflects that there were fewer units of housing affordable to households making below 80 percent of the area median income that were issued building permits than were required for the regional housing needs assessment cycle for that reporting period, and the project seeking approval dedicates 50 percent of the total number of units to housing affordable to households making below 80 percent of the area median income, unless the locality has adopted a local ordinance that requires that greater than 50 percent of the units be dedicated to housing affordable to households making below 80 percent of the area median income, in which case that ordinance applies.

SB 4, proposed but not passed in 2019, offered an approach to community revitalization financing similar to California’s now-dissolved Redevelopment Agency program. SB 4 proposed a minimum of 30% of the total number of units to be dedicated to low-income units for the incentive.

SB4 (as proposed, 4.10.19 version) Section 2 (c)(10), Project requirements:

(10) For a TOD project of 10 units or greater, the development proponent dedicates a minimum of 30 percent of the total number of units available at an affordable rent or affordable housing cost to households earning below 80 percent of the area median income and executes a recorded affordability restriction for at least 55 years. If the local agency has adopted a local ordinance that requires that greater than 30 percent of the units be dedicated to housing affordable to households making below 80 percent of the area median income, then that local ordinance shall apply.

Other recent incentives for the production of inclusionary housing include tax-increment-financing approaches for special districts, such as Enhanced Infrastructure Financing Districts (EIFDs), and the “Revitalization Areas” of Community Revitalization and Investment Authorities (CRIAs). When addressing inclusionary housing needs through community-wide or jurisdiction-wide planning and financing incentives, it can be easier to impose significantly higher affordable housing targets than a singular project can accommodate.

SB 961 (2018) the Second Neighborhood Infill Finance and Transit Act [NIFTI2, an amended version of NIFTI1 (AB 1568 (2017) and previous EIFDs) requires at least 40% of total funds to be used for housing affordable to incomes below 60% of AMI, of which 50% of those housing funds must be for units affordable to incomes below 30% of AMI.

SB 961 (2018) NIFTI2: Section 53398.75.7 (b) (B) of the Government Code, district requirements:

(B) The infrastructure financing plan requires that at least 40 percent of the total funds received by the district pursuant to this section be used for the acquisition, construction, or rehabilitation of housing, including the costs of predevelopment and land acquisition, for households with incomes below 60 percent of area median income for rent or purchase. Predevelopment costs include, but are not limited to, site control, engineering studies, architectural plans, application fees, legal services, permits, bonding, and site preparation.

(C) The infrastructure financing plan requires that 50 percent of the housing funds are used to develop housing affordable to and occupied by households with incomes below 60 percent and greater than 30 percent of area median income, and 50 percent of the housing funds are used for either housing affordable to and occupied by households with incomes below 30 percent of area median income or permanent supportive housing to help homeless persons get off the street.

EIFDs and CRIAs were created in response to the vacuum left by the dissolution of Redevelopment for affordable housing funding. Unfortunately, due to financing and governance complexities outside of the scope of this analysis, jurisdictions have largely found EIFDs and CRIAs to be infeasible, and these new tools have rarely been used.

Tenant Protections:

Undeniably, a primary driver of low-income household displacement is the increase of rent rates (and related unfair eviction practice) when and where improvements are made to an existing community. However, views on how to effectively curb increasing rents in improving neighborhoods vary greatly. The repeal of the Costa Hawkins Act, which prohibits jurisdictions from adopting rent-control ordinances on units built after 1995, has long been a goal of many affordable housing advocates. Yet, all such attempts for repeal have failed. While the pros and cons and efficacy of rent-control programs have, and will continue to be, hotly debated, there has been growing interest across the state for some form of

limited protections against rapidly rising rents in historically disadvantaged communities and the places we need affordable housing most. In response, AB 1482, the Tenant Protection Act of 2019, was successfully passed, though not without controversy. AB 1482 does not override Costa Hawkins, nor does it override existing rent-control and just-eviction ordinances, but it offers basic state-wide protections against the most egregious rent-gouging and eviction practices.

AB 1482, Summary of provisions:

Anti-rent gouging

- Caps annual rent increases at 5% Plus Inflation, but never to exceed a maximum of 10% .
- Rent may not be increased more than twice over a 12-month period (total not to exceed the annual cap).
- Applies only to apartments and multi-family housing containing two units or more.
- Does not apply to single-family homes and condos (except when owned by a corporation, real estate investment trust, or limited liability corporation in which at least one member is a corporation), or duplexes when one of the units is occupied by the owner.
- Does not apply to buildings constructed within the past 15 Years (on a rolling basis).
- Does not apply to vacant units—rents can reset to market rate at vacancy, and then resume conformity to the annual cap.

Just Cause Eviction

- Prohibits evictions and non-renewals of leases without Just Cause. For tenants that have lived in a unit for at least one year, AB 1482 prohibits evictions and non-renewals of leases without “At Fault” or “no Fault” “Just Cause.”
- “At Fault Just Cause” includes failure to pay rent, criminal activity, or breach of a material term of the lease.
- “No Fault Just Cause” includes intention of the owner to occupy the property, withdrawing the property from the rental market, intent to demolish or substantially remodel the property, or compliance with a local ordinance or order issued by a governmental agency.
- Renter must be given an opportunity to cure “curable lease violations.”
- In the case of converting rentals to condos or “substantially” remodeling the property, renters must be paid relocation fees equal to one month of rent.

Demolition restrictions, Relocation Assistance and Right of First Return

Preserving existing affordable housing stock is necessary to meet our housing needs and to protect against disruption of communities and displacement of existing residents by new development. To avoid the incentivization of demolishing existing affordable housing, here too SB 35 (2017) set a standard for demolition restrictions that was carefully negotiated with affordable housing advocates.

SB 35 (2017): Section 65913.4 (a)(7) of the Government Code:

(7) The development is not located on a site where any of the following apply:

(A) The development would require the demolition of the following types of housing:

- (i) Housing that is subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of moderate, low, or very low income.
 - (ii) Housing that is subject to any form of rent or price control through a public entity’s valid exercise of its police power.
 - (iii) Housing that has been occupied by tenants within the past 10 years.
- (B) The site was previously used for housing that was occupied by tenants that was demolished within 10 years before the development proponent submits an application under this section.
- (C) The development would require the demolition of a historic structure that was placed on a national, state, or local historic register.

(D) The property contains housing units that are occupied by tenants, and units at the property are, or were, subsequently offered for sale to the general public by the subdivider or subsequent owner of the property.

In 2018, PCL was a party to anti-displacement language negotiations for the above discussed NIFT2 Act, SB 961. This language was not adopted in the final legislation, but none the less presents some key considerations for community protections in infill incentive programs. First, while the goal and funding structure of SB 961 seeks to increase affordable housing, this language would have also provided an additional backstop with a no-net-loss provision for low and moderate-income housing. Secondly, the language would have provided a simplified no-demolition clause, similar to SB 35. However, rather than a strict prohibition on demolition, the language would allow for exceptions where deemed necessary, provided that the number of affordable units demolished is replaced by at least 50% more units of like affordability within the project or the district.

SB 961 (2018) (draft amendments that were not adopted):

(1) No net loss of low-income residents

The municipality shall ensure that over the life of the district there is no net loss of low and moderate-income residents within the district. If there has been a net loss, then the city/district shall correct the loss over the next five years with policies to enhance the production of housing for low and moderate-income households sufficient to remedy that net loss. .

(2) No displacement of existing residents

A local NIFTI-2 program implementing ordinance shall require that new development within the district shall not occur on sites where the development would require the demolition of housing that is subject to a local rent control law; or housing that is subject to a covenant or law that requires rents to be affordable to and occupied by households of moderate, low, or very low income; or housing that has been occupied by tenants within the past 5 years.

Notwithstanding the above, a new residential development or a new mixed-use development with multifamily residential units can be built on such sites if the new development will provide at least 50% greater number of housing units than those demolished and the developer provides affordable replacement units that exceeds the number of units demolished either within the new project or at another location within the district with comparable access to transit. These replacement units shall be subject to a covenant that such units shall remain affordable to and occupied by very-low, low and moderate- income households for the life of the project.

Tenant occupants of the units proposed to be demolished shall be provided assistance in finding a comparable housing unit within the district, funds for reasonable cost of relocation, plus rental assistance equal to their monthly rent in the previous unit for 36 months. Displaced tenants shall be given the right to return and occupy a unit in the new development comparable to the unit in which they previously lived at the same rent.

Finally, the draft SB 961 language above addresses relocation assistance for residents displaced by any such demolition, as well as right-of-first return for those residents to the required replacement units. These provisions have been used commonly in incentives and redevelopment programs and this draft language would have provided for stronger assistance than many, but historically it has been found that relocation and return assistance is not enough by itself. Once people have moved they usually stay moved. Therefore, if the demolition is deemed necessary to replace sub-standard housing or to significantly increase density, relocation assistance and right-of-first return should indeed be granted to existing residents, but the proximity of the relocation to the original site is of paramount importance to be an effective anti-displacement strategy.

Small business displacement protections:

Round recognition exists within the groups convened regarding the need to protect affordable, neighborhood-scale, local business and commercial space with our infill development investments. Neighborhood scale business in proximity to housing is a critical component of creating low-VMT equitable communities. Not only does proximity to such commercial space increase the likelihood of accessibility to essential shopping needs and services without the use of an automobile, but it also increases opportunities for business ownership and employment across income levels. Recognizing this, the AHSC funding guidelines incorporate scoring criteria for local business protections in ASHC investment.

Affordable Housing and Sustainable Communities grant guidelines, Round 5 (2019):

(2) Up to 2 points (1 point per strategy) for **Projects** demonstrating policies, strategies or programs that either currently exist or will be implemented through this **Project** to prevent the displacement of locally-owned businesses from the area surrounding the **Project**. One point will be given for a policy, strategy, or program that either currently exists or is newly implemented through this **Project**. Two points will be given for two policies, strategies, or programs, either as one currently existing and one newly implemented through this **Project**, or both newly implemented through this **Project**. Strategies should be selected from this following list:

- Implementation of an overlay zone to protect and assist small businesses;
- Establishment of a small business advocate office and single point of contact for every small business owner;
- Creation and maintenance of a small business alliance;
- Increased visibility of the jurisdiction's small business assistance programs;
- Formal program to ensure that some fraction of a jurisdiction's purchases of goods and services come from local businesses;
- Prioritization of Minority and Women Business Enterprises (MWBE) for public contracting.

Here again, the draft-but-not-adopted language for SB 961 discussed above also proposed anti-displacement provisions for local business similar to that relocation and right-of-first return provisions to residents of low-income housing.

SB 961 (2018) (draft amendments that were not adopted):

(3) Relocation and right to return for displaced small businesses

A local program implementing ordinance shall require that local businesses within the district that are displaced by new development after the adoption of a resolution creating the district shall be either relocated to a comparable location within the district with comparable amenities and under similar terms including comparable rents and provided 24 months of rent support at its rent levels at the time of relocation. Such local businesses shall be offered a right to return to the replacement building into comparable space with comparable rents and terms as applied prior to the space from which it was relocated.

Beyond displacement protections for existing small businesses, there is much interest and discussion within this PLC initiative for developing an inclusionary standard for the *production* of a neighborhood scale, locally accessible commercial space for infill development incentives. Requiring a certain proportion of affordable small business space in mixed-use and commercial projects could be a particularly effective tool in sub-urban communities dominated by housing-only land use, and rural

communities where small business stock has deteriorated after decades of investment in auto-oriented big-box regional-scale shopping centers.

Equitable Location Efficiency to Services:

Similar to the observations made for the importance of local business proximity within a community, is the proximity of essential services such as health care, food, schools, and open space. While PCL proposes that VMT performance is a valuable general proxy for location efficiency in most cases, the AHSC guidelines incorporate scoring criteria that accommodate a much more nuanced analysis of location efficiency and equitable access to essential services.

Affordable Housing and Sustainable Communities grant guidelines, Round 5 (2019):

5. (e) **Location Efficiency and Access to Destinations - 6 Points Maximum**
 1. Up to 3 points will be given for the Location Efficiency of the **Project** site as determined by the US EPA Walkability Index using the address of the **Project** site. If the **Project** is a corridor and does not have a specific address, use the center most point of the **Project** for the calculation. [Click here for the methodology for the Walkability Index](#). Points will be given on the following scale:
 - 3 points: Most Walkable (Dark Green; 15.25-20)
 - 2 points: Above Average Walkable (Light Green; 10.51-15.25)
 - 1 point: Below Average Walkable (Yellow; 5.76-10.5)
 - 0 points: Least Walkable (Orange; 1-5.75)
 2. Up to 3 points will be given for projects that provide a map highlighting the location of existing **Key Destinations** within the Project Area. Each type of **Key Destination** is worth one third of a point and may only be counted once.
 - Grocery store which meets the CalFresh Program requirements
 - Medical clinic that accepts Medi-Cal payments
 - Public elementary, middle or high school
 - Licensed child care facility
 - Pharmacy
 - Park accessible to the general public
 - Public library
 - Office park
 - University or junior college
 - Bank or Post Office
 - Place of worship

Value Capture

There has been a significant amount of discussion within the initiative on the use of “value capture” mechanisms to protect against displacement, in part because of debates on this topic concerning SB 50, a failed 2019 legislation, which would mandate significant residential up-zoning in “Transit-rich” and “Jobs-rich” areas statewide.

There are many varying examples of how value capture has been employed by jurisdictions across the country, but the basic concept is this:

- A given property is zoned for a specific density and has given land value in accordance with that density.

- An action is taken to up-zone that property to a higher density, and the property has a corresponding increase in value; more units equal more value.
- The jurisdiction sets a proportion of the un-earned added value to be given back to, or “captured” by, the jurisdiction for the purposes of supporting infrastructure upgrades and/or other needed public amenities, which in turn benefit that property and the surrounding area.

Value Capture is usually considered as an application in instances where formal action is being taken to up-zone densities, but it can also be employed anywhere that increase of density is occurring within allowable densities. Revenues from this captured value are often, but not necessarily, targeted at mitigating displacement through dedication to affordable housing needs and reducing other community inequities in the given area.

Such targeted value capture mechanisms could indeed be an effective tool for reducing displacement from new development, particularly in disadvantaged communities, but views vary greatly on what an appropriate proportion of “capture” should be. Extant examples range from nominal values of few percent to 10%, and as much as 70 or 80%. Still, others contend that such a mechanism would only disincentivize the kind of high-density development we need to accelerate to meet California’s housing needs.

In Germany, a kind of value capture is used in the inverse to discourage greenfield development: Before building entitlements are approved, the landowner or developer must sell the land to the local government at the agricultural/natural land price, then re-purchase it at the up-zoned price...100% of the unearned increment accrues to the benefit of the public! A topic that surfaced multiple times for the Roundtable was the notion that if we want our equitable infill incentives to work, greenfield development should also bear the true costs of that expansion to the public. Often referred to as “internalizing the externalities” of sprawl, Germany’s value capture system could indeed be an effective tool to “level the playing field” between greenfield expansion and infill investment. Another more immediate opportunity is ambitious SB 743 implementation, discussed more on pages 16 and 52.

Community Engagement and Career Development

It cannot go without saying how often the importance of community engagement in infill planning processes was discussed among PCL’s Roundtable participants, particularly in disadvantaged communities.

As it pertains to the deployment of infill incentives, it becomes difficult to see an effective way to impose strict community engagement obligations on relatively small individual housing or mixed-use projects that do not undercut the goal of streamlining or otherwise accelerating such developments. However, there is round agreement amongst our stakeholders that major multi-faceted investments or multi-project district-wide and community-wide revitalization plans that stand to have transformational housing, transportation, and employment impacts on existing communities should have robust and genuine community engagement in the early planning stages of these projects and plans. Such projects could include sports stadiums, civic-centers, major educational, medical and research institutions, or large transit corridor investments.

Genuine community engagement in the planning process of such major investments is essential to illuminate and address housing, transportation, and other health and safety needs specific to that community. Further, meaningful partnerships with existing residents, businesses, and community institutions can provide opportunities for integration of education and employment pathways for residents which protect and promote the integrity and economic stability of the community.

There are many varying examples of how this kind of meaningful engagement has been conducted across California, and many more examples where it has not. Often this kind of process is produced through Community Benefits Agreements specific to an individual project. However, a statewide standard is lacking for what community engagement obligations should be on these major investments.

An excellent example of meaningful community engagement worth pointing to, outside of California, is the public-private partnership that emerged from the Green Line transit corridor project connecting St. Paul and Minneapolis, Minnesota (see [“Corridors of Opportunity” here](#)). This kind of partnership demonstrates that when these major investments are planned thoughtfully, with community participation, the product can simultaneously protect and lift up the community as a whole.

Equity and Displacement Findings and Recommendations:

Throughout PCL's consultations with experts across sectors in this Roundtable process, there appears to be broad recognition that displacement of low-income residents from investments in existing communities is a fundamental problem that has yet to be adequately addressed in our approaches to correcting California's affordable housing crisis. Such displacement certainly poses challenges to correcting historical patterns of segregation and inequitable access to opportunity, but there also is an acknowledgement of the challenges that displacement poses to our GHG reduction goals.

Previous research conducted by CNT, which this project built upon, found that "...given [this] formulation of location-efficiency variables at a half-mile radius from the household, there were no statistically significant income and location efficiency interactions." Yet despite this, CNT also concluded that "This research finds that location-efficient affordable housing is an effective climate strategy. Developing parcels for lower-income households in location-efficient areas is likely to lead to higher reductions in VMT than developing those parcels for higher-income populations. The cause of this difference is not that lower-income households show greater VMT reduction with location efficiency because VMT reduction is consistent across income groups, but that lower-income households live more compactly in location-efficient areas – allowing each parcel to yield more VMT reduction" ([Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy](#), Haas, Center for Neighborhood Technology, 2015, pg.17, 22). However, CNT's current mapping produced for the PCL Roundtable (see pg. 21) illustrates that, when considering household composition and housing type variables, low-income households produce significant lower VMT across community types, but even more so in location-efficient areas. This suggests to PCL that the compactness and travel behavior of low-income households produces a greater compounded VMT-reducing effect than previously understood, the exact nature of which warrants further exploration.

In either case, it is clear that low-income housing in location-efficient areas has greater potential to reduce VMT than higher-income housing. And while we acknowledge that displacement of low-income households from location-efficient areas impedes our ability to reduce VMT and meet our climate goals, views on how to protect against this displacement vary greatly. There are those that believe that simply accelerating housing supply of any type is the primary solution, but even among those that believe that strict inclusionary requirements and anti-displacement protections are also needed, there is hesitance to try to pin-point a standard set of such criteria, as PCL has endeavored to do with this project. Some housing and equity advocates that work most closely with communities experiencing displacement commonly contend that the needed solutions depend heavily on that specific community's context, and that there is no one-size-fits-all set of criteria that will adequately address the needs of these widely varying community conditions.

PCL sincerely appreciates this insight, but nonetheless, PCL remains persistent in the wish to explore the possibility of establishing base-standard for inclusionary and anti-displacement criteria for infill incentives and investments. Compiling all the input we have thus far from this analysis, we propose here draft criteria options that could be considered for such a base-standard, in combination with potential additional considerations that could be employed to accommodate differing community contexts. We propose these draft recommendations (and questions) as a platform for further discussion, with the full recognition that much more work is to be done. Everything here is subject to further input.

Draft Equity Protections for Infill Incentives

Inclusionary Requirements

Individual Projects:

- To qualify for streamlining or funding incentives for infill, unless the given jurisdiction has met its RHNA allocation for Low, Very Low, and Extremely Low Income housing, individual housing and/or mix-used projects of ten or more housing units must dedicate deed-restricted units at a minimum of 10% of units affordable to Low Income households, 5% of units affordable to Very Low income households, and 5% of units affordable to Extremely Low income households.
- If Extremely Low Income housing is deemed infeasible within the project itself, the project must directly accommodate an additional project siting for the Extremely Low Income units within no more than a ½ mile radius of the original project site.
- Units dedicated to Moderate Income housing should not be admissible as a replacement for lower income unit obligations as a base requirement for infill incentives, but should be considered as an additional bonus asset in scoring criteria for competitive funding programs or other incentives.

Multi-project Area Plans:

- As community-wide or jurisdiction-wide special districts and revitalization plans have more flexibility to accommodate housing needs across income levels, these area plans should be expected to dedicate double the lower income unit requirements for individual projects to infill; plan-wide cumulative housing proportions should include a minimum of 20% of units affordable to Low Income households, 10% of units affordable to Very Low income households, and 10% of units affordable to Extremely Low income households.

In-lieu Fees:

- In-lieu fee rates and protocols for inclusionary housing vary greatly across programs and jurisdictions, and often the fee rate is less than the true cost of the housing being foregone. In-lieu fees must only be allowed when the fees are illustrated to be commensurate to the true cost of the Low, Very Low or Extremely Low housing obligation that is being passed on by the project in that jurisdiction.
- An established state methodology for determining an appropriately commensurate price point in a given jurisdiction should be established, but until such a standard is established, PCL recommends that inclusionary housing in-lieu fees for projects qualifying for infill incentives should be highly discouraged, if not prohibited.
- If in-lieu fees are employed, those sums should be used for projects within ½ mile radius of the project from which the fee was extracted.

Demolition

- Restrictions on demolition should be held to the standard that was negotiated for SB 35 (2017) discussed earlier. Infill incentives should not be afforded to projects that would require demolition of:
 - Housing that is subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of moderate, low, or very low income.
 - Housing that is subject to any form of rent or price control.
 - Housing that has been occupied by tenants within the past 10 years (or a site was previously used for housing that was occupied by tenants that was demolished within 10 years).
 - A historic structure that was placed on a national, state, or local historic register.

Exceptions to the above demolition restrictions should be extremely limited. In line with the recommended language for SB 961 discussed earlier:

- Where it is found by the discretionary agency that demolition is warranted due to existing irreparable substandard housing conditions or an overwhelming public benefit of the proposed project, the project should be required to accommodate at least 50% increase in deed-restricted units affordable to the income levels of the units being replaced, proportionately, either within the project site itself, or within a ½ mile radius of the project site.
- Tenants to be displaced by the demolition shall be provided assistance in finding a comparable housing unit within a 1/2 mile of the project site, granted funds for reasonable cost of relocation as well as rental assistance at least equal to any difference of the previous rent and the rent of the relocation site for 36 months, and be given the right-of-first return to occupy a comparable unit in the new development at the same rent.

Small Business Inclusion and Protection

Inclusionary requirements and anti-displacement protections for affordable local commercial space should be a qualification for infill incentives, similar to that proposed for affordable housing. Provided that standard definitions for “affordable,” “small,” and “local” as it pertains to commercial space must be established, with such standard definitions, the following provisions could be responsible infill incentive criteria for local business:

- Individual multi-unit mixed-use and commercial projects should be required to provide at least 20% of the project’s commercial space to space/units affordable to small and local businesses.
- Multi-project community-wide or jurisdiction-wide special districts and revitalization plans, having more flexibility, should require at least 40% of total available commercial space dedicated to space/units affordable to small and local business.

- The demolition restrictions listed above for affordable housing should also apply to affordable rental commercial space. Exceptions to the demolition restrictions should be avoided, but where demolition is deemed necessary, the same relocation assistance and right-of-first return provisions described for affordable housing would also apply to affordable commercial space. Where interim relocation of a business is not feasible, reasonable compensation for loss of business will be granted to the business operator until a comparable replacement unit is made available by the new project. The methodology for determining “reasonable compensation” is to be determined.
- If in-lieu fees are to be employed for affordable commercial space obligations, the fee rate must illustrate that it is adequately commensurate with the true cost of the proportion of affordable commercial space the project is obligated to provide in the given locale.
- Base anti-rent gouging and just-cause eviction protections enacted by AB 1482 (2019) for housing tenants should also be provided to renters of commercial space.

Additional Location Efficiency Considerations

- The AHSC scoring criteria and employment of the “walkability index” for analyzing a site’s access to essential services are a model to be emulated for considering a project’s equitable transportation performance (see pg. 38). While PCL would not recommend that such specific metrics be considered as base criteria for broad streamlining and financing incentives, we do feel that such metrics are effective as additional scoring criteria for competitive funding programs, particularly for affordable housing siting considerations.
- These criteria could also be effective tools for analyzing the transportation efficiency of strategic siting of mixed-used and neighborhood-scale business in housing-only dominated communities, and small rural towns. Such applications should be explored for the purposes of expanding applicable areas for VMT-based “Green-Zone” infill incentives.

Value Capture

- A reasonable proportion of value increases on a property due to either formal up-zoning actions, or on any parcel on which an increase in density is occurring, should be “captured” by the local jurisdiction for dedication to affordable housing or other equitable community amenities. The reasonable proportion of value, that is both commensurate with the housing needs of the given community and also not a counter-productive deterrent to development, is to be determined.

Further Equity Considerations

PCL's Roundtable discussions on how to identify a standard set of equity protections for infill incentives raised as many questions as it answered, and there is certainly more work to be done. All of the above recommendations warrant more vetting from stakeholders, but there are also many outstanding policy concepts that need further exploration. Concepts include:

In-lieu fees: development of a methodology for determining appropriate in-lieu fees levels for affordable housing and affordable commercial space that are adequately commensurate with the true cost of the proportion of affordable housing or commercial obligations of the project, relative to the given locale.

Affordable commercial space: development of definitions is needed for what constitutes "affordable," "small," or "local" commercial space for the purposes of establishing inclusionary standards and anti-displacement protections for local business, as well as potential in-lieu fees, and reasonable compensation rates for lost business during replacement construction.

Neighborhood scale business is a critical component of creating low-VMT equitable communities. Not only does proximity to such commercial space increase the likelihood of accessibility to essential shopping needs and services without the use of an automobile, but it also increases opportunities for business ownership and employment across income levels. Targeting mixed-use and commercial infill incentive with requirements for the promotion and protection of small business as proposed here could be a particularly effective tool for providing equitable, low-VMT access to jobs and services in suburban communities dominated by housing-only land use, and rural communities where small business stock has deteriorated after decades of investment in auto-oriented big-box regional-scale shopping centers.

Addition location-efficiency criteria: the AHSC location efficiency scoring criteria and "Walkability Index" (see pg. 38) should be explored for potential broader applications of incentives in rural and suburban communities beyond the proposed "Green Zone" VMT-based metric.

Development of a methodology for better determining **Jobs-Housing "Fit"** (as opposed to "balance") within and across communities is also needed, as previous attempts by Metropolitan Planning Organizations and other agencies have proven infeasible.

Tenant (and home-owner) protections: with the basic anti-rent gouging and just-cause eviction protections afforded by AB1842 in place statewide, further exploration is needed of what additional protections may be appropriate as base-line criteria for infill incentives. Suggestions for consideration as either base-line criteria or as additional criteria in competitive funding programs include:

- Low-income homeowner assistance programs in the form of loans or payment plans for delinquent taxes, or needed code violation repairs.
- First-right options for renters to buy.
- Extension of affordable deed-restriction horizons, perhaps for perpetuity.
- Dedication of surplus public lands to affordable housing or community-owned land trusts.

Value capture: Much more discussion is needed on how and where and when value capture should be employed. However, PCL would like to see development of a statewide standard for determining appropriate value capture rates for formal up-zoning actions as well as wherever an increase in density occurs.

Value Capture for Everything?

Thinking about value capture through this project, PCL has an interest in exploring ways to develop a methodology for determining a kind of “value capture” from any kind of infill improvement, and if indeed such a mechanism could be feasible. Determining a value to be captured from a finite property value increase due to an increased density is one thing, but what about community improvements with community benefits beyond a specific site or project? For instance, a bike path, or increased transit frequency, or planting trees to increase the shade canopy? All such projects would make that given neighborhood nicer, and in turn cause potential increases in property and rental values, but how could that value be “captured” for such projects and then employed to protect low-income residents from displacement? How would one determine the increase in property value? What is the extent of the value increase to the neighborhood in proximity to such improvements? From what or whom would that value be extracted, and to whom and how would it be allocated?

Community Engagement and Career Development: Major multi-faceted investments or multi-project district-wide and community-wide revitalization plans that stand to have transformational housing, transportation, and employment impacts on existing communities should be required to have robust and genuine community engagement processes in the design of these projects and plans. A statewide standard needs to be developed for community participation in the planning of major investments, particularly in disadvantaged communities, that includes consideration of housing, transportation, and community health and safety, as well as the integration of local business considerations and employment pathways towards economic stability for existing residents.

Policy Applications for Combined Equitable Infill Recommendations

With all of the outstanding questions for further consideration aside, PCL proposes that the essential framework of the combined infill-definition and equity-protection criteria recommendations would look as follows.

Example of the Base-line Criteria for a New “Equitable Low-VMT Infill Incentive” Standard

To qualify for the given “infill” incentive, the project must:

- Be located wholly within a regional or city “Green Zone” (areas of -15% of existing average per capita VMT, or within ½ mile of a high-quality transit stop).
- or-
- If not in an existing Green Zone, demonstrate with an Initial Study Transportation Analysis that the project is projected to have VMT performance of at least -15% of regional or city average.
- Not be in areas excluded from applicability, as governed by objective statewide mapping of sensitive areas essential to protecting public health and safety and the environment. (See proposed list, pg. 28), or as determined by an Initial Study.
- Be in conformity to all applicable local code, zoning, and design standards.
- For housing or mix-used projects of ten or more housing units, dedicate deed-restricted units at a minimum of 10% of units affordable to Low Income households, 5% of units affordable to Very Low income households, and 5% of units affordable to Extremely Low income households, unless the given jurisdiction has met its RHNA allocations for Low, Very Low or Extremely Low Income housing, respectively. (If Extremely Low Income housing is deemed infeasible within the project itself, the project must directly accommodate an additional project siting for the Extremely Low Income units within no more than a ½ mile radius of the original project site).
- or-
- For multi-project community-wide or jurisdiction-wide special districts or revitalization plan areas, dedicate a minimum of 20% of units affordable to Low Income households, 10% of units affordable to Very Low income households, and 10% of units affordable to Extremely Low income households.
- Not include demolition of:
 - Housing that is subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of moderate, low, or very low income.
 - Housing that is subject to any form of rent or price control.
 - Housing that has been occupied by tenants within the past 10 years (or a site which was previously occupied by tenants and was demolished within 10 years).
 - A historic structure that was placed on a national, state, or local historic register.

- Where it is found by the governing agency that demolition is warranted, dedicate at least a 50% increase in deed-restricted units affordable to the income levels of the units being replaced, proportionately, either within the project site itself, or within a ½ mile radius of the project site.
- Provide housing tenants displaced by the demolition with:
 - Assistance in acquiring a comparable housing unit within a 1/2 mile of the project site.
 - Funds for the reasonable cost of relocation as well as rental assistance at least equal to any difference of the previous rent and the rent of the relocation site for 36 months.
 - Right of first return to occupy a comparable unit in the new development at the same rent.
- For multi-unit mixed-use and commercial projects, dedicate at least 20% of the project's commercial space to units affordable to small and local business
- or-
- For multi-project community-wide or jurisdiction-wide special districts and revitalization plan areas, dedicate at least 40% of total available commercial space to units affordable to small and local businesses.
- Not include demolition of:
 - Commercial units that are subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to "small" or "local" businesses.
 - Commercial units that are subject to any form of rent or price control.
 - Commercial units that have been occupied by tenants within the past 10 years (or a site was previously used for business that was occupied by tenants that was demolished within 10 years).
 - A historic structure that was placed on a national, state, or local historic register.
- Where it is found by the governing agency that demolition is warranted, dedicate at least a 50% increase in deed restricted units affordable to "small" or "local" business, either within the project site itself, or within a ½ mile radius of the project site.
- Provide commercial tenants displaced by the demolition with:
 - Assistance in acquiring a comparable commercial unit within a 1/2 mile of the project.
 - Funds for the reasonable cost of relocation as well as rental assistance at least equal to any difference of the previous rent and the rent of the relocation site for 36 months.
 - Right-of-first return to occupy a comparable unit within the project at the same rent.
- Where interim relocation of a business is deemed infeasible, reasonable compensation for loss of business will be granted to the business operator until a comparable replacement unit is made available by the project.

The barriers to Equitable Infill and the Potential Applications of the New Equitable Infill Standard

Much has been written on the challenges to infill development (for example, see “Removing the Roadblocks,” Elkind, Frank, Weissman, UCLA School of Law and UC Berkeley School of Law, 2009), but the fundamental challenge for accelerating infill development is the simple truth that greenfield development is easier and cheaper than infill. There are indeed many reasons and complexities involved for why this is so, and the need to “level the playing field” between greenfield and infill development was a topic that arose multiple times within the Roundtable. Greenfield expansion must be made to bear the true environmental and social costs of that development, and SB 743 implementation, discussed more below, offers an immediate opportunity to do this. Yet, the primary focus of this initiative has been on the infill side of the equation, and how to make it easier, cheaper, and at the same time more socially and environmentally responsible.

Imbalances of costs associated with greenfield development aside, infill developers will report that the primary barriers for quality infill development are high impact fees, lack of zoning capacity, needed infrastructure upgrades to capacitate higher densities (which the developer is often expected to bear), and neighborhood resistance to higher density and/or mixed-income development (commonly referred to as NIMBYism, “Not In My Back Yard”). The proposed framework of criteria for a new equitable infill incentive standard will certainly not solve all of these problems, but we feel there are indeed a myriad of current opportunities for application of such a standard to address, at least in part, each of these challenges.

CEQA Streamlining:

Perennially, particularly in recent years as the effects of the housing crisis have become more acute, the legislature proposes dozens of CEQA reforms and exemptions in the name of accelerating housing production. Some of these proposals are more aligned with California’s goals than others, and many have passed and many more have not. Proponents of these often deep-cutting CEQA streamlining proposals will argue that the burdens of CEQA are the primary obstruction to greater housing production in California. Yet, a recent study has found that less than 1% of development proposals are litigated through CEQA (see “CEQA in the 21st Century,” BAE Urban Economics, 2016, pg. ii).

Considering the Urban Economics study, PCL does not agree that CEQA is the primary obstruction to housing production, and, would contend that the public process that CEQA provides is essential to ensuring that our development decisions are not harming the environment or the public. This being said, we also feel that the 1% figure of the study does not represent the number of projects that never move forward due to fear of neighborhood opposition and all the time, cost and uncertainty that such an opposition could bring. This fear certainly has a most chilling effect on affordable and mixed-income infill development. With this recognition, PCL, as a long-time guardian of CEQA, does indeed support CEQA streamlining and exemptions as long as they are targeted to incent the right things in the right place.

PCL feels that CEQA streamlining that is directed in accordance with the above proposed Equitable Infill criteria would responsibly incent development aligned with California’s climate, health, and equity goals. While the levels of streamlining appropriate to corresponding levels of low-VMT performance may be further negotiated, areas of very low-VMT and projects demonstrating deep VMT reduction as well as deep equity protections should warrant proportionately strong streamlining.

With the advent of more by-right ministerial approvals, jurisdictions could exercise greater guidance and discretion on where and how development is directed by adopting an “Infill Element” to the General Plan (a concept proposed by the Council of Infill Builders) or a “Low-VMT Overlay Zone.” Such a plan would govern applicable densities, the mix of appropriate mix of (non-auto-oriented uses), parking restrictions etc. to target, coordinate, and expedite development accordingly to local needs, and to identify and address risks of displacement.

Such an Infill Element would also offer the opportunity for jurisdictions to include robust community participation in the development of these plans to address community-identified needs, particularly in communities at high risk of displacement.

Housing and Infrastructure Funding Programs:

Competitive funding programs should be directed towards low-VMT uses in Low-VMT “Green Zones” with the inclusionary and anti-displacement criteria proposed here. As discussed earlier, the Affordable Housing and Sustainable Community (AHSC) program, Infill Infrastructure Grant (IIG) program, and Transit-Oriented Development (TOD) program guidelines offer comprehensive approaches to the challenges we seek to address here, which other state and local programs should model. There has been, however, a clear expression from some for the need to simplify these guidelines and to provide greater consistency across these programs. The combined Equitable Low-VMT Infill criteria proposed here could provide a framework for simplification and consistency across these programs, which local programs could in turn follow.

While the call for greater simplification is clear across incentive programs, competitive funding programs do offer an opportunity to provide more nuanced criteria in addition to the base-criteria proposed here, such as AHSC’s “location efficiency” scoring, to better target investment equitably and in accordance with specific community needs. Such nuance in scoring criteria should not be entirely eliminated.

Redevelopment:

After 60 years of operation, California’s Redevelopment Agencies were dissolved in 2011, and have left a gap in affordable housing funding that has not yet been filled, despite recently approved housing bonds and multiple budget increases across state funding programs. The pros and cons, abuses and benefits, of past Redevelopment have long been debated, but proposals to enact something similar to Redevelopment have been attempted in almost every session since the dissolution.

While the hotly debated complexities and questions regarding how such a program is financed, participated in, and governed are outside of the scope of this analysis, our concern here is to where and to what revenues would be directed if something similar to Redevelopment were reestablished. If a Redevelopment-esque program is established, such districts should be constrained to Low-VMT zones, and meet, at a minimum, the base-line equity criteria proposed here.

EIFDs, CRIAs, and NIFTIs:

After the dissolution of Redevelopment, attempts to fill the gap have included the creation of EIFDs and CRIAs that would employ similar tax-increment-financing mechanisms, albeit with much more limited authority over who is obligated to participate and how bonds can be issued. These tools have thus far been underutilized. The reasons for this, concerning the nuances of the financing and governance these tools offer, are again not the subject of this research. Here too, our primary concern lies with where, and to what, revenues from such tools would be directed.

A new generation of EIFDs, NIFTI1 (AB 1568 (2017)) and NIFTI2 (SB 961 (2018), see pg. 36), focused the previously established EIFD concept toward affordable transit-oriented development, with explicit affordable housing targets, and explicitly excluding investments in highways and interchanges, among many other provisions. Building upon the NIFTI approach, EIFDs, CRIAs and other special funding districts should direct investment exclusively towards Low-VMT Zones, in conformity to our proposed inclusionary and anti-displacement criteria.

Opportunity Zones:

Federal “Opportunity Zones” were initiated in the waning days of the Obama administration, and put into implementation in 2017 by the Trump administration, albeit with much looser criteria and enforcement of expected outcomes. In short, Opportunity Zones offer reduction or deferral of capital-gains taxes for improvements made to qualifying “properties” and “businesses” in qualifying census tracts. Qualifying census tracts must generally be low-income communities. Such communities are defined as having a poverty rate of at least 20% or a median family income of 80% or less of the metropolitan area or state median family income.

While the concept is laudable, many problems with its implementation have arisen. First, the adopted Opportunity Zone census tracts often do not correspond well with realities on the ground and specific areas of need viewed through a higher resolution filter. Particularly in rural areas, tracts may designate large swaths of land (in some cases, whole counties) without regard for environmental constraints, for where development would even be appropriate, or for where true areas of need exist.

Further, instances of abuse of the incentives are being increasingly documented across the country, where the “opportunity” project has not aligned at all with the needs of the community, often with luxury development that has only accelerated gentrification and displacement of the low-income residents the incentives were intended to help.

California is grappling with how the State can tailor Opportunity Zone implementation within our boundaries. However, how we can do so remains to be seen. Again, PCL strongly recommends that these Opportunity Zone incentives be constrained to Low-VMT Zones within the qualifying census tracts, and that strict inclusionary and anti-displacement criteria be imposed on these investments.

Zoning Reform:

While not exactly an “incentive,” proposals to significantly up-zone residential densities should also be constrained to Low-VMT Green Zones, including the “Transit-Rich” and “Jobs-Rich” area designations in the much debated SB 50 (2019) proposal. While the base-line inclusionary and anti-displacement project criteria proposed here would not apply to zoning applications, we do believe that, instead, a value-capture mechanism for affordable housing (see pg. 38) is warranted for such up-zoning actions.

SB 743 Implementation:

As discussed earlier (pg. 16), the CEQA guidelines for SB 743 (2013) implementation impose a new VMT-based methodology for determining transportation impacts of land use and transportation projects. Jurisdictions are required to adopt their own Thresholds of Significance (TOS) for VMT and mitigation protocols by July 1st, 2020, after which the new VMT guidelines take full effect.

Calibrated to the VMT reduction needs identified by CARB to meet California’s GHG reduction goals, OPR’s recommended threshold is -15% regional or city average per capita VMT, and is the basis of the VMT-based definition of infill we propose here. Holding jurisdictions to the OPR recommendation is

critical, posing the most significant current opportunity to incent the low-VMT growth we need to meet our climate goals, while also disincentivizing high-VMT growth.

Where high-VMT growth does occur, it will now also be required to mitigate those impacts by either implementing or paying into offsetting low-VMT projects. Therefore ensuring that the cost of this mitigation is commensurate with the impact is also critical.

If conducted properly, SB 743 will be a great accelerator of low-VMT infill development, but with this acceleration, VMT-mitigation protocols and investments must also be governed by the inclusionary and anti-displacement criteria we propose.

The Governor’s Executive Order on Climate, and the Pro-Housing Guidelines:

The 2019-2020 Budget Act mandated development of the Prohousing Designation program, for which HCD is currently developing guidelines. Meeting the housing production thresholds required to obtain a “Prohousing Designation” will in turn qualify, or enhance preference for, the jurisdiction for multiple state funding and support programs.

The first draft of these guidelines, undergoing multiple iterations of input, do express some consideration of “location efficient development” and “climate change mitigation.” However, we would suggest the inclusion of explicit VMT performance requirements for housing development in accordance to those recommended here. Certainly, not all housing will have a -15% average VMT performance, but the guidelines should emphasize the importance of directing as many resources to VMT-reducing development as possible.

The draft Prohousing guidelines also give ample consideration to affordable housing needs, yet gives little-to-no mention of the need to curb displacement. Here too we feel the anti-displacement policies discussed in this report could offer a framework for what should be expected of jurisdictions in this regard.

In September of 2019, The Governor issued an Executive Order on Climate, [EO-19-19](#). Among other laudable goals, the Order directs that \$5 billion annually of state transportation expenditures be spent in alignment with California’s GHG and VMT reduction goals. In the implementation of this order, the Administration should look to the VMT-based metric provided by OPR for SB 743, and emulated here, directing these monies exclusively to low-VMT Green Zones and VMT-reducing projects that expand these zones. Likewise, jurisdictions that receive these funds should be expected to adopt inclusionary and anti-displacement policies like those discussed here to curb the displacement pressures these improvements can bring.

The sources of, and restrictions on, California’s transportation dollars, are very complex. After a previous legislative attempt that PCL participated in to get California’s transportation agencies to begin conditioning our transportation dollars to our climate and equity goals, we realize it’s not so easy. Unraveling the complexities of the State’s funding apparatus will be a monumental and heavily politicized task. \$5 billion is a start, but we must go further. It simply makes no sense that *any* state housing, transportation or infrastructure dollars should go to projects that are not also in alignment with our climate and equity goals.

Next Steps

The recommendations presented by this report are a draft and in no way conclusive, and much work remains to be done. Despite the skepticism along the way that an effective set of base-line equitable infill criteria could be identified, with the interest and quality of input we have thus far received, PCL remains confident that there is indeed a pathway to our goal. PCL maintains that this is a conversation worth continuing.

The immediate next step for the Roundtable is the recirculation of these draft recommendations and criteria to our cross-interest participants for further vetting, input, and refinement, with particular attention to the many questions that have been raised for further consideration (pgs. 27 and 45). Of these many considerations detailed earlier, key areas of question we are focused on include:

Rural VMT:

A primary concern is to determine whether the proposed low-VMT performance-based metric for defining infill will be effectively productive for, rather than disproportionately punishing of, unincorporated small rural communities. If concern remains that the average VMT thresholds will not adequately provide coverage of needs of these communities, multiple possibilities for tailoring the methodology discussed earlier will need to be explored.

Sensitive Lands:

Consensus on the short-list of essential sensitive lands for exclusion of applicability from incentives needs to be determined before such a standard can be established. We will need to develop protocols for a centralized, iteratively updated, and accountable mapping database of these lands as an objective, open-sourced standard for agencies, developers, and the public. OPR is currently underway with the development of a prototype of such a mapping database, which should be further resourced to this end.

An Affordable Housing Green Zone:

A primary implication of the CNT research for this report is that, when considering housing-type and household-composition factors, low-income households appear to produce significantly less VMT than higher income level households. This has spurred great interest in further exploration of these implications, and of the feasibility of establishing a separate “Green Zone” for affordable housing. An affordable Green Zone could potentially provide a greater area of coverage, including increased opportunities for rural communities.

Affordable Commercial Space Definition:

We anticipate that the proposed inclusionary and anti-displacement criteria for local affordable commercial space will be a challenge to implement. If found feasible, the execution of these criteria will require the determination of standard definitions for what qualifies as “affordable,” “small,” or “local” commercial space, as well as the rate of “reasonable compensation” for lost business during construction.

General Inclusionary and Anti-displacement Criteria:

The inclusionary and anti-displacement criteria and corresponding thresholds presented in this draft are a summation of the input we’ve received and what has been previously established in

law. We recognize that more input is needed from our partners in consideration of the efficacy of these recommendations.

As we move forward with feedback and refinement of the Equitable Infill Incentive Criteria proposal, there remain multiple supportive legislative or regulatory actions that should be pursued, including:

DTSC hazardous site mapping: It has been found that the Department of Toxic Substance Control data regarding hazardous sites is in many cases not accountably up to date, and otherwise lacks centralized coordination for reliable reference. Action should be taken to ensure this data is up to date (and updated iteratively hereafter), and centrally compiled and spatialized for inclusion into a sensitive lands mapping database.

Extension of AB 1842 to commercial space: While it may be infeasible to impose anti-rent gouging and just-cause eviction protections for commercial tenants as a base-criteria for general infill incentives, we feel that these protections now mandated for housing tenants by AB 1842 (2019) should be extended to commercial space legislatively.

In addition to the compilation of “sensitive lands” mapping, OPR is also underway with the development and compilation of statewide regional and city average VMT performance mapping. This is an effort PCL aims to support, and there has been interest in employing technical assistance from the Center for Neighborhood Technology in this work, building upon the research conducted for the Roundtable. In addition to exploring possibilities for the development of “Affordable Green Zone” mapping, and PCL’s interest in exploring the feasibility of a methodology for determining the VMT impacts of displacement, CNT has identified multiple possible next steps for tool development to further this research:

The data presented here form a solid foundation for assessing VMT performance and infill, but we have identified several possible next steps to help put this analysis into action:⁹

- To make these data more accessible and usable, an online tool could be developed that allows regulators and stakeholders to look up the performance factors of their place and assess development patterns.
- A scenario tool could be developed that allows a user to analyze the VMT impacts of building housing of different types and affordability thresholds.
- Consideration of the potential impacts on VMT of expanding transit service or increasing jobs density could be incorporated, as well as density’s impact on the viability of expanding public transit.
- Such a tool could also take the equity analysis further and incorporate research on how displacement may affect household travel needs and costs.
- Finally, California’s Scoping Plan indicates a need to reduce VMT statewide by 15% to meet our climate goals. An online tool could be used to assess this and other thresholds of performance by place.

⁹ For examples of online tools to help stakeholders make housing development decisions that CNT has developed see GreenTrip Connect <https://www.cnt.org/tools/greentrip-connect> and the King County Right Size Parking Calculator <https://www.cnt.org/tools/right-size-parking-calculator>

Finally, with successful refinement of the criteria proposed here, all of the earlier discussed policy applications could be pursued for use and adaption of these equitable location-efficiency requirements across California's incentive programs.

While there are many potential policy contexts for the application of these criteria, PCL's primary aim moving forward will be the development of a CEQA streamlining mechanism to establish this new standard for equitable low-VMT infill incentives.

After this first phase of The Equitable Infill Incentives Initiative, PCL persists in its belief that to achieve our environmental, climate, health, and equity goals simultaneously we must address California's housing crisis by aggressively focusing our resources on infill development. We must also implement inclusionary and anti-displacement requirements that protect our existing communities' most vulnerable residents. Accommodating this degree of investment will inevitably bring change to our neighborhoods, but we believe that the simple fact remains that to meet these goals some amount of change to our communities is necessary. There is always a fear of change, but, if done thoughtfully, these investments will enhance our neighborhoods rather than detract from them. Yet protecting communities at risk of displacement is paramount to ensure that all residents, old and new, equitably reap the benefits of these improvements. Perhaps no amount of policy guidance will eliminate displacement, but we must do our best to minimize it.

Appendices:

Appendix A: compiled definitions of infill, urban area, urban use, TOD (provided by OPR)

Infill Area, Infill Site

Definition	Where Used
<p>Infill site means a site in an urbanized area that meets either of the following criteria:</p> <p>(a) The site has not been previously developed for urban uses and both of the following apply:</p> <p>(1) The site is immediately adjacent to parcels that are developed with qualified urban uses, or at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses, and the remaining 25 percent of the site adjoins parcels that have previously been developed for qualified urban uses.</p> <p>(2) No parcel within the site has been created within the past 10 years unless the parcel was created as a result of the plan of a redevelopment agency.</p> <p>(b) The site has been previously developed for qualified urban uses.</p>	<p>PRC 21061.3. CEQA statutory exemptions (unless another definition is specified)</p> <p>PUC 29010.1 BART TOD bill</p> <p>Gov Code 65589.4 Attached Housing Developments</p>
<p>“Infill site” means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.</p>	<p>PRC 21099 SB 743 CEQA exemption for aesthetic and parking impacts</p> <p>Health and Safety Code 50700 (definition of infill project) Housing related parks program</p> <p>PRC 21094.5 SB 226 CEQA streamlining</p>
<p>A site in which at least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses. For the purposes of this section, parcels that are only separated by a street or highway shall be considered to be adjoined.</p>	<p>Gov Code 65913.4 SB 35 streamlining</p>

<p>“Qualifying infill area” means a contiguous area located within an urbanized area (1) that has been previously developed, or where at least 75 percent of the perimeter of the area adjoins parcels that are developed with urban uses, and (2) in which at least one development application has been approved or is pending approval for a residential or mixed-use residential project that meets the definition and criteria in this section for a qualified infill project.</p> <p>“Qualifying infill project” means a residential or mixed-use residential project located within an urbanized area on a site that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses.</p>	<p>Health and Safety Code 53545.12 Infill Infrastructure Grant Program</p>
<p>The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.</p>	<p>CEQA Guidelines 15332 Class 32 Categorical Exemption</p>
<p>“Substantially surrounded” means at least 75 percent of the perimeter of the project site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. The remainder of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that have been designated for qualified urban uses in a zoning, community plan, or general plan for which an environmental impact report was certified.</p>	<p>PRC 21159.25 Infill housing CEQA exemption for unincorporated counties</p> <p>(Note, this definition of substantially surrounded does not apply to the Class 32 exemption above. That is undefined.)</p>
<p>“Infill area” means a vacant or underutilized lot of land within an urban area that has been previously developed or that is surrounded by parcels that are or have been previously developed.</p>	<p>Health and Safety Code 25395.79.2 California Land Reuse and Revitalization Act of 2004</p>
<p>“Infill Site” means a site for which at least three sides of the perimeter of the site adjoins parcels that are Currently Developed qualified Urban Uses. In counting this,</p>	<p>Affordable Housing Sustainable Communities grant program guidelines</p>

<p>perimeters bordering navigable bodies of water and improved parks shall not be included.</p> <p>“Currently Developed” means that the land in question is altered by paving, construction, and/or land use that would typically have required regulatory permitting to have been initiated.</p>	
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Qualified Urban Uses, Urban Uses

Definition	Where Used
<p>“Qualified urban use” means any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.</p>	<p>PRC 21072 CEQA statutory exemptions (unless another definition is specified)</p> <p>Health and Safety Code 53545.12 (“Urban Use” but same definition) HCD capital improvement grant program, will be used for SB 3 Bond infill infrastructure grants</p> <p>Health and Safety Code 50700 (“Urban Use” but same definition) Housing related parks program</p>
<p>“Urban Uses” means any residential, commercial, industrial, transit, transportation passenger facility, or retail use, or any combination of those uses. Urban uses do not include lands used for agricultural uses or parcels in excess of 15,000 square feet in size and containing only one single-family residence.</p>	<p>Affordable Housing Sustainable Communities grant program guidelines</p>
<p>“Urban Uses” means any residential, commercial, industrial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.</p>	<p>Infill Infrastructure Grant Program</p>

Urbanized, Urban Area

Definition	Where Used
<p>“Urbanized area” means either of the following:</p> <p>(a) An incorporated city that meets either of the following criteria:</p> <p>(1) Has a population of at least 100,000 persons.</p> <p>(2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.</p> <p>(b) An unincorporated area that satisfies the criteria in both paragraph (1) and (2) of the following criteria:</p> <p>(1) Is either of the following:</p> <p>(A) Completely surrounded by one or more incorporated cities, and both of the following criteria are met:</p> <p>(i) The population of the unincorporated area and the population of the surrounding incorporated city or cities equals not less than 100,000 persons.</p> <p>(ii) The population density of the unincorporated area at least equals the population density of the surrounding city or cities.</p> <p>(B) Located within an urban growth boundary and has an existing residential population of at least 5,000 persons per square mile. For purposes of this subparagraph, an “urban growth boundary” means a provision of a locally adopted general plan that allows urban uses on one</p>	<p>PRC 21071</p> <p>CEQA statutory exemptions (unless another definition is specified)</p>

<p>side of the boundary and prohibits urban uses on the other side.</p> <p>(2) The board of supervisors with jurisdiction over the unincorporated area has previously taken both of the following actions:</p> <p>(A) Issued a finding that the general plan, zoning ordinance, and related policies and programs applicable to the unincorporated area are consistent with principles that encourage compact development in a manner that does both of the following:</p> <p>(i) Promotes efficient transportation systems, economic growth, affordable housing, energy efficiency, and an appropriate balance of jobs and housing.</p> <p>(ii) Protects the environment, open space, and agricultural areas.</p> <p>(B) Submitted a draft finding to the Office of Planning and Research at least 30 days prior to issuing a final finding, and allowed the office 30 days to submit comments on the draft findings to the board of supervisors.</p>	
<p>“Urbanized area” means an incorporated city or an urbanized area or urban cluster as defined by the United States Census Bureau. For unincorporated areas outside of an urban area or urban cluster, the area shall be within a designated urban service area that is designated in the local general plan for urban development and is served by public sewer and water.</p>	<p>Health and Safety Code 53545.12 HCD capital improvement grant program, will be used for SB 3 Bond infill infrastructure grants</p> <p>Health and Safety Code 50700 Housing-related parks program</p> <p>Infill Infrastructure Grant Program</p>
<p>An urbanized area is any urban location that meets the definition used by the United State Department of Commerce’s Bureau of Census for “urban” and includes locations with core census block groups containing at least 1,000 people per square mile and surrounding census block groups containing at least 500 people per square mile.</p>	<p>Gov Code 65944 Planning & Zoning Law, military notice of development applications</p>
<p>“Urbanized area” consists of a central city or cities and surrounding closely settled territory, as determined by the Department of Finance on the basis of the most recent</p>	<p>PRC 5621 Urban Open-Space and Recreation Program</p>

<p>verifiable census data. “Urbanized county” means any county with a population of 200,000 or more, as determined by the Department of Finance on the basis of the most recent verifiable census data.</p> <p>“Heavily urbanized area” means a large city with a population of 300,000 or more and a large county or regional park district with a population of 1,000,000 or more, as determined by the Department of Finance on the basis of the most recent verifiable census data.</p>	
<p>In order to qualify as an infill site, the site must also be located in an urbanized area meaning that it fulfills one of the following requirements:</p> <p>(1) located within an incorporated city according to an official City or County map, OR</p> <p>(2) located within an urbanized area or urban cluster as defined by the U.S. Census Bureau at http://www.census.gov/2010census/, OR</p> <p>(3) for unincorporated areas outside an urbanized area or urban cluster, the area shall be within a designated urban service area that is designated in the local general plan for urban development and is served by public sewer and water.</p>	<p>Affordable Housing Sustainable Communities grant program</p>
<p>“Urban area” includes either an incorporated city or an unincorporated area that is completely surrounded by one or more incorporated cities that meets both of the following criteria:</p> <p>(A) The population of the unincorporated area and the population of the surrounding incorporated cities equal a population of 100,000 or more.</p>	<p>PRC 21094.5 SB 226 CEQA streamlining Likely SB 743 exemption for aesthetic and parking impacts (no other definition for “urban area” provided in the statute)</p> <p>Health and Safety Code § 25395.79.2 California Land Reuse and Revitalization Act of 2004</p>

(B) The population density of the unincorporated area is equal to, or greater than, the population density of the surrounding cities.	
Legal parcel or parcels wholly within the boundaries of an urbanized area or urban cluster, as designated by the United States Census Bureau.	PRC 21159.25 Infill housing CEQA exemption for unincorporated counties
A site that is a legal parcel or parcels located in a city if, and only if, the city boundaries include some portion of either an urbanized area or urban cluster, as designated by the United States Census Bureau, OR, for unincorporated areas, a legal parcel or parcels wholly within the boundaries of an urbanized area or urban cluster, as designated by the United States Census Bureau.	Gov Code 65913.4 SB 35 streamlining
"Urban area" means any portion of a county or the state which is not a rural area.	Health and Safety Code 50104.7 State Housing Policy

Transit Priority Area, and Other Definitions Based on Location Efficiency

Definition	Where Used
"Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations .	PRC 21099 SB 743 exemption for aesthetic and parking impacts PRC 21155.4 SB 743 CEQA exemption Government Code 65917.2 Density Bonuses Infill Infrastructure Grant Program Guidelines
Transit Priority Project be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.	PRC 21155 SB 375

<p>Sustainable Communities Project</p> <p>The transit priority project is located within one-half mile of a rail transit station or a ferry terminal included in a regional transportation plan or within one-quarter mile of a high-quality transit corridor included in a regional transportation plan.</p>	<p>PRC 21155.1</p> <p>SB 375 CEQA exemption</p>
<p>A transit village development district shall include all land within not more than one-half mile of the main entrance of a transit station designated by the legislative body of a city, county, or city and county that has jurisdiction over the station area.</p>	<p>Govt. Code 65460.4</p> <p>Transit Village Plans/ Eligible for transportation funding</p>
<p>“Transit-rich housing project” means a residential development the parcels of which are all within a one-half mile radius of a major transit stop or a one-quarter mile radius of a stop on a high-quality bus corridor. A project shall be deemed to be within a one-half mile radius of a major transit stop or a one-quarter mile radius of a stop on a high-quality bus corridor if both of the following apply:</p> <p>(1) All parcels within the project have no more than 25 percent of their area outside of a one-half mile radius of a major transit stop or a one-quarter mile radius of a stop on a high-quality bus corridor.</p> <p>(2) No more than 10 percent of the residential units or 100 units, whichever is less, of the project are outside of a one-half mile radius of a major transit stop or a one-quarter mile radius of a stop on a high-quality bus corridor.</p>	<p>SB 50 (Wiener, proposed)</p>
<p>“Low vehicle travel area” means a traffic analysis zone that exhibits a below average existing level of travel as determined using a regional travel demand model. For residential projects, travel refers to either home-based or household vehicle miles traveled per capita. For commercial and retail projects, travel refers to non-work attraction trip length; however, where such data are not available, commercial projects reference either home-based or household vehicle miles</p>	<p>CEQA Guidelines, Appendix M</p> <p>SB 226 Streamlining</p>

traveled per capita. For office projects, travel refers to commute attraction vehicle miles traveled per employee; however, where such data are not available, office projects reference either home-based or household vehicle miles traveled per capita.	
<p>A residential or office project is eligible if it is located in a “low vehicle travel area” within the region</p> <p>OR</p> <p>If located within 1/2 mile of an Existing Major Transit Stop or High Quality Transit Corridor</p> <p>OR</p> <p>100% affordable housing anywhere</p>	<p>CEQA Guidelines, Appendix M SB 226 Streamlining</p> <p>(at least 75% of surface area of project must be within specified area)</p>
<p>A commercial project is eligible if it is located in a “low vehicle travel area” within the region</p> <p>OR</p> <p>If located within 1/2 mile of within ½ mile of 1800 households</p>	<p>CEQA Guidelines, Appendix M SB 226 Streamlining</p> <p>(at least 75% of surface area of project must be within specified area)</p> <p>(commercial can’t have any buildings with floor-plates greater than 50,000 square feet)</p>
15% below regional average per capita VMT	<p>OPR’s SB 743 TA</p> <p>Projects within this area may not need to analyze transportation impacts</p>
<p>Lower-than-average household vehicle-miles-traveled (VMT)</p> <p>OR</p> <p>Within three miles of significant rail station</p>	Berkeley’s Right Type, Right Place report
<p>Three tiers of projects in Guidelines:</p> <p>(1) Transit-oriented Development-- Must be located within ½ mile of High Quality Transit (15-min headways or less and operate 7 days a week)</p>	Affordable Housing Sustainable Communities Grant Program Guidelines

<p>(2) Integrated Connectivity Project—Must have Qualifying Transit (at least 2 departures during peak hours, unless it is Flexible Transit Service)</p> <p>(3) Rural Innovation Project Area—Must have Qualifying Transit (at least 2 departures during peak hours, unless it is Flexible Transit Service) AND must be located in rural area</p>	
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Major Transit Stop, High-Quality Transit Corridor

Definition	Where Used
<p>“Major transit stop” means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.</p>	<p>PRC 21064.3 CEQA statutory exemptions (unless otherwise specified)</p> <p>Government Code 53398.75.7 NIFTI-2 financing mechanism</p> <p>SB 743 Technical Advisory</p> <p>Infill Infrastructure Grant Program</p>
<p>A major transit stop is as defined in Section 21064.3 of the Public Resources Code, except that, for purposes of this section, it also includes major transit stops that are included in the applicable regional transportation plan.</p>	<p>Govt. Code 65088.1 Congestion Management Act</p> <p>PRC 21155 Sustainable Communities Strategies</p> <p>HSC 18962 State Historical Building Code</p> <p>Government Code 65917.2 Density Bonuses</p> <p>Government Code 65915.7 Density Bonuses</p>
<p>“Major Transit Stop” means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with frequencies of service intervals of 15 minutes or less during the morning and</p>	<p>CEQA Guidelines, Appendix M SB 226 Streamlining</p>

afternoon peak commute periods. For the purposes of this Appendix, an “existing major transit stop” may include a planned and funded stop that is included in an adopted regional transportation improvement program.	
“Major transit stop” means a site containing an existing rail transit station or a ferry terminal served by either bus or rail transit service.	SB 50 (Wiener, proposed)
A high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.	Govt. Code 65088.1 Congestion Management Act PRC 21155 Sustainable Communities Strategies SB 743 Technical Advisory
“Transit station” means a rail or light-rail station, ferry terminal, bus hub, or bus transfer station. “Bus hub” means an intersection of three or more bus routes, with a minimum route headway of 10 minutes during peak hours. “Bus transfer station” means an arrival, departure, or transfer point for the area’s intercity, intraregional, or interregional bus service having permanent investment in multiple bus docking facilities, ticketing services, and passenger shelters. “Peak hours” means the time between 7 a.m. to 10 a.m., inclusive, and 3 p.m. to 7 p.m., inclusive, Monday through Friday.	Govt. Code 65460.1 Transit Village Development Planning Act of 1994 Infill Infrastructure Grant Program Guidelines
“High-quality transit corridor” means an existing corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. For the purposes of this Appendix, an “existing stop along a high-quality transit corridor” may include a planned and funded stop that is included in an adopted regional transportation improvement program.	CEQA Guidelines, Appendix M SB 226 Streamlining

<p>“High-quality bus corridor” means a corridor with fixed route bus service that meets all of the following criteria:</p> <p>(1) It has average service intervals of no more than 15 minutes during the three peak hours between 6 a.m. to 10 a.m., inclusive, and the three peak hours between 3 p.m. and 7 p.m., inclusive, on Monday through Friday.</p> <p>(2) It has average service intervals of no more than 20 minutes during the hours of 6 a.m. to 10 a.m., inclusive, on Monday through Friday.</p> <p>(3) It has average intervals of no more than 30 minutes during the hours of 8 a.m. to 10 p.m., inclusive, on Saturday and Sunday.</p>	<p>SB 50 (Wiener, proposed)</p>
<p>“High Quality Transit” means a Qualifying Transit line with high frequencies AND permanent infrastructure as follows: (1) Frequency: High Quality Transit must have Peak Period headway frequency of every 15 minutes or less and service seven days a week. (2) Permanent Infrastructure: High Quality Transit must operate on a railway or be transit service with Bus Rapid Transit features that either fully or partially operate on a dedicated bus-only lane, or uses High Occupancy Vehicle (HOV) or High Occupancy Toll (HOT) lanes.</p>	<p>Affordable Housing Sustainable Communities Grant Program Guidelines</p>
<p>“Qualifying Transit” means a transit line serving the public that is operated by the following: (1) Directly operated by a public entity; (2) Operated by a public entity via a contract for purchased transportation service with a private or non-profit provider; or (3) Operated by a private or non-profit entity as a grant Recipient or sub-recipient from a public entity. Qualifying Transit for the purpose of the Program includes various forms of fixed transit service (Rail Service and Bus Service) and Flexible Transit Service. A Qualifying Transit line requires service that departs two (2) or more times during Peak Hours as defined by the transit operator.</p>	<p>Affordable Housing Sustainable Communities Grant Program Guidelines</p>

Flexible Transit service is exempt from these Peak Hours frequency requirements.	
<p>“Flexible Transit Service” means a form of transit for the public characterized by flexible routing and scheduling of small/medium vehicles operating in shared-ride mode (with at least two passengers) between pick-up and drop-off locations according to passenger needs. Flexible Transit Service includes vanpool, shuttle and feeder bus systems that reduce vehicle miles travelled.</p>	<p>Affordable Housing Sustainable Communities Grant Program Guidelines</p>

TECHNICAL ADVISORY

CEQA REVIEW OF HOUSING PROJECTS



CEQA Review of Housing Projects Technical Advisory

This technical advisory is one in a series of advisories provided by the Governor's Office of Planning and Research (OPR) as a service to professional planners, land use officials, and California Environmental Quality Act (CEQA) practitioners. OPR creates and updates technical advisories as needed on current issues in environmental law and land use planning that broadly affect the practice of CEQA and land use planning in California. The purpose of this technical advisory is to provide a list of statutes and regulations related to the CEQA review of housing projects. This document does not cover provisions that are specific to affordable housing, supportive housing, transitional housing, or temporary shelters. This document should not be construed as legal advice.

This technical advisory covers the following statutes and regulations:

Government Code, § 65457

Public Resources Code, § 21081.3

Public Resources Code, § 21094.5

Public Resources Code, § 21099

Public Resources Code, § 21155.1

Public Resources Code, § 21155.2

Public Resources Code, § 21155.4

Public Resources Code, § 21159.22

Public Resources Code, § 21159.23

Public Resources Code, § 21159.24

Public Resources Code, § 21159.25

Public Resources Code, § 21159.28

CEQA Guidelines, § 15183

CEQA Guidelines, § 15303

CEQA Guidelines, § 15332

A chart comparing the various requirements is included as Appendix A. *This document has been updated to reflect statutory changes that took effect on January 1, 2020.*

PRC § 21159.25 – INFILL HOUSING IN UNINCORPORATED COUNTIES

- Applies only to multifamily housing and mixed use projects in unincorporated counties within the boundaries of an urbanized area or urban cluster, as designated by the Census Bureau.
- The project is substantially surrounded (75%) by qualified urban uses; remaining area must be designated for qualified urban uses.
- The project is consistent with general plan and zoning.
- The project site is less than 5 acres.
- The project contains at least 6 units.
- The density of the residential portion of the project is not less than the greater of the following:
 - The average density of the residential properties that adjoin, or are separated only by an improved public right-of-way from, the perimeter of the project site, if any.
 - The average density of the residential properties within 1,500 feet of the project site.
 - Six dwelling units per acre.
- The project site does not have any value as habitat for endangered, rare, or threatened species and can be served by public utilities and services.
- The project will not cause significant effects relating to transportation, noise, air quality, greenhouse gas emissions, or water quality.
- Subject to the exceptions to the categorical exemptions (unusual circumstances, cumulative impacts, scenic resources, historical resources, hazards, etc.).

PRC § 21159.24 – INFILL HOUSING IN URBANIZED AREAS NEAR TRANSIT

- The project is 100 percent residential or up to 25 percent of the building square footage of the residential project includes primarily neighborhood-serving goods, services, or retail uses.
- Project site is an infill site.
- The project is located within an urbanized area.
- The project is consistent with an applicable general plan, specific plan, local coastal plan, and any mitigation measures required by a plan or program.
- The project and other prior approved projects can be adequately served by existing utilities.
- The project has paid, or has committed to pay, all applicable in-lieu or development fees.
- The site does not contain wetlands, does not have any value as wildlife habitat, and the project does not harm species protected by local ordinance or the state and federal endangered species acts.
- The site is not included on any list of facilities and sites compiled by the Department of Toxic Substances Control pursuant to Section 65962.5 of the Government Code.
- The project is subject to a preliminary endangerment assessment prepared to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity and, if any such release or exposure is identified, it must be mitigated to a level of insignificance in compliance with state and federal requirements.
- The project does not have a significant effect on historical resources.
- The project is not subject to a wildland fire hazard, as determined by the Department of Forestry and Fire Protection, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of a wildland fire hazard.

- Materials stored or used near the project site do not create an unusually high risk of fire or explosion.
- The project site would not create a risk of public health exposures at a level that exceed standards established by any state or federal agency.
- The project site is not located within a delineated earthquake fault zone or seismic hazard zone unless the applicable general plan or zoning ordinance contains provision to mitigate the risk.
- The project site is not located in a landslide hazard, flood plain, flood way, or restriction zone, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk.
- The project is not located on developed open space.
- The project site is not located within the boundaries of a state conservancy.
- Within five years of the date that the project application is deemed complete, community-level environmental review was certified or adopted.
- The site is less than four acres.
- The project contains less than 100 residential units.
- The project either:
 - provides at least 10 percent of the housing for sale to families of moderate income, or not less than 10 percent of the housing for rent to families of low income, or not less than 5 percent for rent to families of very low income, and the developer provides sufficient legal commitments to the appropriate local agency to ensure the continued availability and use of the housing units for very low, low-, and moderate-income households at monthly housing costs with an affordable housing cost determined pursuant to paragraph (3) of subdivision (h) of Section 65589.5 of the Government Code; or
 - has paid or will pay in-lieu fees pursuant to a local ordinance in an amount sufficient to result in the development of an equivalent number of units as under the prior bullet.
- The project is within ½ mile of a major transit stop.
- The project does not include any building that exceeds 100,000 square feet.
- The project promotes higher density infill housing, as defined.
- None of the following apply:
 - There is a reasonable possibility that the project will have a project-specific, significant effect on the environment due to unusual circumstances.
 - Substantial changes with respect to the circumstances under which the project is being undertaken that are related to the project have occurred since community-level environmental review was certified or adopted.
 - New information becomes available regarding the circumstances under which the project is being undertaken that was not known, and could not have been known, at the time the community-level environmental review was certified or adopted.

See also **PRC § 21159.21 – Criteria to Qualify for Housing Project Exemptions; PRC § 21159.22 – Agricultural Employee Housing; PRC § 21159.23 – Low-Income Housing**

PRC § 21155.1 (SB 375) – TRANSIT PRIORITY PROJECTS

- The project meets the definition of Transit Priority Project in PRC § 21155.
- The project is consistent with the general use designation, density, building intensity, and applicable policies in an ARB accepted SCS or APS.

- The project and projects approved prior to the project can be adequately served by existing utilities.
- The project has paid or committed to pay to any in-lieu development fees.
- The site does not contain wetlands or riparian areas and does not have significant value as wildlife habitat, and the project does not harm species protected by local ordinance or the state and federal endangered species acts.
- The site is not included on any list of facilities and sites compiled by the Department of Toxic Substances Control pursuant to Section 65962.5 of the Government Code.
- The project is subject to a preliminary endangerment assessment to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity and, if any such release or exposure is identified, it must be mitigated to a level of insignificance in compliance with state and federal requirements.
- The project does not have a significant effect on historical resources.
- The project is not subject to a wildland fire hazard, as determined by the Department of Forestry and Fire Protection, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of a wildland fire hazard.
- Materials stored or used near the project site do not create an unusually high risk of fire or explosion.
- The project site would not create a risk of public health exposures at a level that would exceed standards established by any state or federal agency.
- The project site is not located within a delineated earthquake fault zone or seismic hazard zone unless the applicable general plan or zoning ordinance contains provision to mitigate the risk.
- The project site is not located in a landslide hazard, flood plain, flood way, or restriction zone, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk.
- The project is not located on developed open space.
- The buildings proposed as part of the project are 15 percent more energy efficient than required by Chapter 6 of Title 24 of the California Code of Regulations.
- The buildings and landscaping proposed as part of the project are designed to achieve 25 percent less water usage than the average household use in the region.
- The site is not more than eight acres in total area.
- The project does not contain more than 200 residential units.
- The project does not result in any net loss in the number of affordable housing units within the project area.
- The project does not include any single level building that exceeds 75,000 square feet.
- The project implements all applicable mitigation measures or performance standards or criteria set forth in the prior EIR, and adopted in findings.
- The project is determined not to conflict with nearby operating industrial uses.
- The project is located within one-half mile of a rail transit station or a ferry terminal included in a regional transportation plan (RTP), or within one-quarter mile of a high-quality transit corridor included in an RTP.

- The project meets at least one of the following three additional criteria:
 - At least 20 percent of the housing will be sold to families of moderate income, or not less than 10 percent of the housing will be rented to families of low income, or not less than 5 percent of the housing is rented to families of very low income, and the developer shall provide sufficient legal commitments to the appropriate local agency to ensure the continued availability and use of the housing units for very low, low-, and moderate-income households at monthly housing costs with an affordable housing cost or affordable rent for the period required by the applicable financing. Rental units shall be affordable for at least 55 years. Ownership units shall be subject to resale restrictions or equity sharing requirements for at least 30 years.
 - The project has paid or will pay in-lieu fees pursuant to a local ordinance in an amount sufficient to result in the development of an equivalent number of units as under the prior bullet.
 - The project provides public open space equal to or greater than five acres per 1,000 residents of the project.

See also **PRC § 21159.28 (SB 375) – Residential or Mixed-Use Project Streamlining re Growth-Inducing Impacts, GHGs, and Regional Transportation Network; PRC § 21155.2 (SB 375) – Streamlined environmental analysis for Transit Priority Projects**

PRC § 21094.5, CEQA GUIDELINES 15183.3 (SB 226) – INFILL HOUSING

- Covers residential and mixed-use projects that are located in an urban area on a site that either has been previously developed or that adjoins existing qualified urban uses on at least seventy-five percent of the site's perimeter.
- The project satisfies all applicable statewide performance standards set forth in Appendix M of the CEQA Guidelines.
- The project meets one of the three criteria:
 - Are consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in a qualifying Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS).
 - Where a project is located within the boundaries of a metropolitan planning organization (MPO) for which an SCS or APS is required but has not yet been adopted, this streamlining applies to residential infill projects with a density of at least 20 units per acre or mixed-use projects with a floor area ratio (FAR) of at least 0.75.
 - Where a project is outside the boundaries of an MPO, the infill project must be a small walkable community project, as defined by PRC § 21094.5(e)(4).
- The lead agency prepares a written checklist that demonstrates all potential effects of the project are either:
 - Addressed in a prior EIR for a planning level decision even if that effect was not reduced to a less than significant level in the prior EIR; or
 - Addressed by uniformly applicable development policies or standards, adopted by the lead agency or a city or county.

PRC § 21155.4 (SB 743) – TRANSIT-ORIENTED HOUSING

- Covers residential and mixed-use development projects.
- The project is proposed within a transit priority area.
- The project is consistent and undertaken to implement a specific plan for which an EIR has been certified.
- The project is consistent with the general use designation, density, building intensity, and applicable policies for the project area in either an SCS or APS.
- None of the events below as set forth in PRC section 21166 requiring supplemental review have occurred:
 - Substantial changes are proposed in the project which will require major revisions of the EIR.
 - Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the EIR.
 - New information, which was not known and could not have been known at the time the EIR certified as complete, becomes available.

PRC § 21099 (SB 743) – TRANSIT-ORIENTED HOUSING; STREAMLINED REVIEW

- Aesthetic and parking impacts of a residential or mixed-use residential project on an infill site within a transit priority area shall not be considered significant impacts on the environment.

See also **PRC § 21081.3** – Not required to analyze aesthetic impacts for infill housing projects converting abandoned or dilapidated buildings

CEQA GUIDELINES § 15183; PRC § 21083.3 – PROJECTS CONSISTENT WITH APPLICABLE ZONING AND PLANNING

- The zoning, community plan, or general plan policies must have been approved based on a certified EIR and all agencies required to implement mitigation measures identified in the EIR have committed to undertake the measures.
- The lead agency should prepare an initial study or other analysis limited to determining whether any impacts:
 - are peculiar to the project or the parcel on which the project would be located;
 - were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent;
 - are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action; or
 - are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.
- The lead agency must hold a hearing and make findings that the feasible mitigation measures in the prior EIR will be implemented.

- An effect of a project on the environment shall not be considered peculiar to the project or the parcel for the purposes of this section if uniformly applied development policies or standards have been previously adopted by the city or county with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect.

GOVERNMENT CODE § 65457 – HOUSING COVERED BY A SPECIFIC PLAN

- Covers any residential development project, including any subdivision, or any zoning change that is undertaken to implement and is consistent with a specific plan for which an EIR has been certified after January 1, 1980.
- If after adoption of the specific plan, an event as specified in Section 21166 of the Public Resources Code occurs, the exemption does not apply unless and until a supplemental environmental impact report for the specific plan is prepared and certified in accordance with CEQA.
- After a supplemental environmental impact report is certified, the exemption applies to projects undertaken pursuant to the specific plan.

Categorical Exemptions

CEQA GUIDELINES § 15303 (CLASS 3 CATEGORICAL EXEMPTION) – NEW CONSTRUCTION OF A SMALL NUMBER OF HOUSING UNITS

- Outside Urbanized Areas:
 - One single-family residence, or a second dwelling unit in a residential zone.
 - A duplex or similar multi-family residential structure totaling no more than four dwelling units.
 - A store, motel, office, restaurant or similar structure not involving the use of significant amounts of hazardous substances and not exceeding 2,500 square feet in floor area.
- In Urbanized Areas:
 - Up to three single-family residences may be constructed or converted.
 - Apartments, duplexes and similar structures designed for not more than six dwelling units.
 - Up to four commercial buildings not involving the use of significant amounts of hazardous substances and not exceeding 10,000 square feet in floor area on sites zoned for such use where all necessary public services and facilities are available and the surrounding area is not environmentally sensitive.

CEQA GUIDELINES § 15332 (CLASS 32 CATEGORICAL EXEMPTION) – INFILL HOUSING

- The project is consistent with the applicable general plan designation and all general plan policies, as well as with zoning designation and regulations.

- The project occurs within city limits.
- The site is 5 acres or less.
- The site is substantially surrounded by urban uses.
- The project site does not have any value as habitat for endangered, rare or threatened species.
- The project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- The site can be adequately served by all needed utilities and public services.

Note: The categorical exemptions are limited by the exceptions contained in CEQA Guidelines § 15300.2.

	Infill Housing PRC 21159.24	SB 375 PRC 21155.1	SB 226 PRC 21094.5	SB 743 PRC 21155.4	Specific Plan GC 65457	Tiering Guideline 15183	Class 32 Guideline 15332	AB 1804 PRC 21159.25	Class 3 Guideline 15303
Type of Housing Covered	Residential or mixed-use (up to 25% commercial)	Residential or mixed-use (at least 50 percent residential) ¹⁰	Residential or mixed-use	Residential or mixed-use	Residential	Residential or mixed-use	Residential or mixed-use	Must be multifamily; residential or mixed-use (up to 33% commercial)	Residential; single family and multifamily
Location Requirements	“Urbanized area” as defined by PRC 21071 ¹¹	Within an MPO	“Urban area” as defined by PRC 21094.5 ¹²	Within an MPO	N/A	N/A	Within city limits	Unincorporated urbanized area or urban cluster, as designated by	Different requirements depending on whether urbanized or

¹⁰ See PRC § 21155.

¹¹ “**Urbanized area**” means either of the following:

(a) An incorporated city that meets either of the following criteria:

(1) Has a population of at least 100,000 persons.

(2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.

(b) An unincorporated area that satisfies the criteria in both paragraph (1) and (2) of the following criteria:

(1) Is either of the following:

(A) Completely surrounded by one or more incorporated cities, and both of the following criteria are met:

(i) The population of the unincorporated area and the population of the surrounding incorporated city or cities equals not less than 100,000 persons.

(ii) The population density of the unincorporated area at least equals the population density of the surrounding city or cities.

(B) Located within an urban growth boundary and has an existing residential population of at least 5,000 persons per square mile. For purposes of this subparagraph, an “urban growth boundary” means a provision of a locally adopted general plan that allows urban uses on one side of the boundary and prohibits urban uses on the other side.

(2) The board of supervisors with jurisdiction over the unincorporated area has previously taken both of the following actions:

(A) Issued a finding that the general plan, zoning ordinance, and related policies and programs applicable to the unincorporated area are consistent with principles that encourage compact development in a manner that does both of the following:

(i) Promotes efficient transportation systems, economic growth, affordable housing, energy efficiency, and an appropriate balance of jobs and housing.

(ii) Protects the environment, open space, and agricultural areas.

(B) Submitted a draft finding to the Office of Planning and Research at least 30 days prior to issuing a final finding, and allowed the office 30 days to submit comments on the draft findings to the board of supervisors.

¹² “**Urban area**” includes either an incorporated city or an unincorporated area that is completely surrounded by one or more incorporated cities that meets both of the following criteria:

(A) The population of the unincorporated area and the population of the surrounding incorporated cities equal a population of 100,000 or more.

(B) The population density of the unincorporated area is equal to, or greater than, the population density of the surrounding cities.

	Infill Housing PRC 21159.24	SB 375 PRC 21155.1	SB 226 PRC 21094.5	SB 743 PRC 21155.4	Specific Plan GC 65457	Tiering Guideline 15183	Class 32 Guideline 15332	AB 1804 PRC 21159.25	Class 3 Guideline 15303
								the Census Bureau	non-urbanized area. “Urbanized area” as defined by PRC 21071
Transit-Proximity Requirements	Within ½ mile of major transit stop as defined by PRC 21064.3 ¹³	Within 1/2 mile of a rail transit station or a ferry terminal included in a regional transportation plan (RTP) OR Within ¼ mile of a high-quality transit corridor, as defined by	Within ½ mile of major transit stop or high-quality transit corridor that is existing or planned and funded in the regional transportation improvement program (RTIP); OR	Transit priority area as defined by PRC 21099 ¹⁶	N/A	N/A	N/A	N/A	N/A

¹³ **“Major transit stop”** means a site containing any of the following:

- (a) An existing rail or bus rapid transit station.
- (b) A ferry terminal served by either a bus or rail transit service.
- (c) The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

“Bus rapid transit” means a public mass transit service provided by a public agency or by a public-private partnership that includes all of the following features:

- (1) Full-time dedicated bus lanes or operation in a separate right-of-way dedicated for public transportation with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
- (2) Transit signal priority.
- (3) All-door boarding.
- (4) Fare collection system that promotes efficiency.
- (5) Defined stations.

“Bus rapid transit station” means a clearly defined bus station served by a bus rapid transit.

¹⁶ **“Transit priority area”** means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.

	Infill Housing PRC 21159.24	SB 375 PRC 21155.1	SB 226 PRC 21094.5	SB 743 PRC 21155.4	Specific Plan GC 65457	Tiering Guideline 15183	Class 32 Guideline 15332	AB 1804 PRC 21159.25	Class 3 Guideline 15303
		PRC 21155, ¹⁴ included in an RTP	In “low vehicle travel area”; ¹⁵ OR 100% affordable with 300 or fewer units						
Infill Requirements	“Infill site” as defined by PRC 21061.3 ¹⁷	N/A	Site either has been previously developed OR Adjoins existing qualified urban uses on at least seventy-five percent of the site's perimeter	N/A	N/A	N/A	Substantially surrounded by urban uses (not defined)	Substantially surrounded (75%) by qualified urban uses; remaining area must be designated for qualified urban uses; Qualified urban uses as defined by PRC 21072 ¹⁸	N/A
Density Requirements	20 du/acre or 10 du/acre depending on	Based on SCS, but must provide	Based on SCS;	Based on SCS	N/A	Must be consistent with the development	N/A	At least 6 du/acre but	N/A

¹⁴ “**High-quality transit corridor**” means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

¹⁵ “**Low vehicle travel area**” means a traffic analysis zone that exhibits a below average existing level of travel as determined using a regional travel demand model. For residential projects, travel refers to either home-based or household vehicle miles traveled per capita.

A “**Traffic Analysis Zone**” is an analytical unit used by a travel demand model to estimate vehicle travel within a region.

¹⁷ “**Infill site**” means a site in an urbanized area that meets either of the following criteria:

(a) The site has not been previously developed for urban uses and both of the following apply:

(1) The site is immediately adjacent to parcels that are developed with qualified urban uses, or at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses, and the remaining 25 percent of the site adjoins parcels that have previously been developed for qualified urban uses.

(2) No parcel within the site has been created within the past 10 years unless the parcel was created as a result of the plan of a redevelopment agency.

(b) The site has been previously developed for qualified urban uses.

¹⁸ “**Qualified urban use**” means any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.

	Infill Housing PRC 21159.24	SB 375 PRC 21155.1	SB 226 PRC 21094.5	SB 743 PRC 21155.4	Specific Plan GC 65457	Tiering Guideline 15183	Class 32 Guideline 15332	AB 1804 PRC 21159.25	Class 3 Guideline 15303
	surrounding area; No building can exceed 100,000 square feet	at least 20 du/acre; if the project contains between 26 percent and 50 percent nonresidential uses, a FAR of not less than 0.75; Does not include any single level building that exceeds 75,000 square feet	For areas outside of MPO, density of at least 8 units per acre or a FAR of not less than 0.50			density established by existing zoning, community plan, or general plan policies for which an EIR was certified Consistency defined by subd. (i)(2) ¹⁹		could require more based on density of surrounding area	
Plan Consistency Requirements	Local plan and zoning consistency required, see PRC 21159.21(a); must have a community-level environmental review ²⁰ within the last 5 years	Consistent with SCS	Consistent with SCS	Consistent with SCS; Must be consistent with a specific plan with an EIR	Must be consistent with a specific plan with an EIR adopted after Jan 1, 1980	Must be consistent with zoning, community plan, <u>OR</u> general plan	Local plan and zoning consistency required	Local plan and zoning consistency required	N/A

¹⁹ **“Consistent”** means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan.

²⁰ **“Community-level environmental review”** means either of the following:

(1) An environmental impact report certified on any of the following:

(A) A general plan.

	Infill Housing PRC 21159.24	SB 375 PRC 21155.1	SB 226 PRC 21094.5	SB 743 PRC 21155.4	Specific Plan GC 65457	Tiering Guideline 15183	Class 32 Guideline 15332	AB 1804 PRC 21159.25	Class 3 Guideline 15303
Minimum or Maximum Number of Units	Less than 100	Less than 200	Less than 300 (but only if not near transit or in low VMT area)	N/A	N/A	N/A	N/A	More than 6	<u>In Urbanized Areas:</u> Up to 3 single-family residences Up to 6 units of apartments, duplexes and similar structures <u>Outside Urbanized Areas:</u> 1 single-family residence, or a second dwelling unit in a residential zone Up to 4 units of a duplex or similar multi-family residential structure
Acreage Limitations	Less than 4	Less than 8	N/A	N/A	N/A	N/A	Less than 5	Less than 5	N/A

(B) A revision or update to the general plan that includes at least the land use and circulation elements.

(C) An applicable community plan.

(D) An applicable specific plan.

(E) A housing element of the general plan, if the environmental impact report analyzed the environmental effects of the density of the proposed project.

(2) Pursuant to this division and the implementing guidelines adopted pursuant to this division that govern subsequent review following a program environmental impact report, or pursuant to Section 21157.1 , 21157.5 , or 21166 , a negative declaration or mitigated negative declaration was adopted as a subsequent environmental review document, following and based upon an environmental impact report on any of the projects listed in subparagraphs (A), (C), or (D) of paragraph (1).

	Infill Housing PRC 21159.24	SB 375 PRC 21155.1	SB 226 PRC 21094.5	SB 743 PRC 21155.4	Specific Plan GC 65457	Tiering Guideline 15183	Class 32 Guideline 15332	AB 1804 PRC 21159.25	Class 3 Guideline 15303
Affordability Requirements	Yes, inclusionary or in lieu	Inclusionary, in lieu, <u>OR</u> public open space; plus no net loss of affordable units	100% (but only if not near transit or in low VMT area)	N/A	N/A	N/A	N/A	N/A	N/A
Environmental Limitations	Wetlands, habitat, species, hazards, historical resources, wildfire or fire hazard, public health, earthquake, landslide, flood plain, open space	Wetlands, habitat, species, hazards, historical resources, wildfire or fire hazard, public health, earthquake, landslide, flood plain, open space Utilities, 15 percent more efficient than Title 24, 25% less water usage than average household, no conflict with nearby industrial uses	Must do soil and water remediation; must comply with air district requirements if near high-volume roadway	N/A	N/A	Must analyze impacts that are peculiar to the project; If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on	Habitat, utilities, “traffic”, noise, air quality, water quality	Habitat, utilities, transportation, noise, air quality, GHG, water quality	None

	Infill Housing PRC 21159.24	SB 375 PRC 21155.1	SB 226 PRC 21094.5	SB 743 PRC 21155.4	Specific Plan GC 65457	Tiering Guideline 15183	Class 32 Guideline 15332	AB 1804 PRC 21159.25	Class 3 Guideline 15303
						the basis of that impact			
Exceptions	Unusual circumstances, or new information		Environmental impacts must be analyzed in plan-level decision ²¹ prior EIR ²²	Must be covered by a specific plan with an EIR; PRC 21166	PRC 21166; if 21166 is triggered, can't use exemption unless update to specific plan is prepared	Substantial new information shows that the uniformly applied development policies or standards will not substantially mitigate the environmental effect	All Cat Ex exceptions See Guideline 15300.2	All Cat Ex exceptions (codified in statute)	All Cat Ex exceptions See Guideline 15300.2

²¹ **“Planning level decision”** means the enactment or amendment of a general plan, community plan, specific plan, or zoning code.

²² **“Prior environmental impact report”** means the environmental impact report certified for a planning level decision, as supplemented by any subsequent or supplemental environmental impact reports, negative declarations, or addenda to those documents.

Appendix C: Center for Neighborhood Technology, CA Infill Index, By Place, Data Table, December 2019

The Infill VMT Index shows the relative performance of places in California based on spatial characteristics that contribute to household Vehicle Miles Traveled (VMT)—employment density and transit availability. The Index Value is a score from 0-100 where 100 is a high-performing place with relatively low VMT and 0 indicates a place with high household VMT relative to other places in the state. The table is organized as follows:

- Column 1) Provides the average Infill VMT Index value for each place in California. CDP’s are Census Designated Places that may not be incorporated. The unincorporated areas of counties in the table exclude these CDPs.
- Columns 2 & 3) VMT varies with income and household size, the table provides modeled VMT in those places for two household types: a low-income 3-person household with 2 children and a middle-income 4-person household with 2 children.
- Column 4) The Infill VMT Index varies within communities—some areas are more location efficient than others—so the table also shows the distribution of land by Index value in each place.

These Index values should be considered in combination with other factors including equity, environmentally sensitive lands, and hazards when prioritizing infill. For more information see the December 2019 see the maps and discussion in the memo “California Infill VMT Index.”

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Emeryville city	Alameda County	73.5	5,311	11,562	802	-	-	521	281
West Hollywood city	Los Angeles County	73.4	4,880	11,131	1,208	-	-	875	333
San Francisco city	San Francisco County	70.8	4,137	10,388	29,970	377	1,132	22,382	6,079
Culver City city	Los Angeles County	70.5	5,629	11,880	3,271	-	28	2,661	582
Beverly Hills city	Los Angeles County	70.1	5,322	11,573	3,654	223	420	1,936	1,075
Santa Monica city	Los Angeles County	68.3	6,261	12,513	5,385	19	232	3,949	1,186
Huntington Park city	Los Angeles County	66.9	6,600	12,851	1,928	-	-	1,928	-
Burbank city	Los Angeles County	66.6	6,036	12,287	11,103	2,977	604	5,302	2,220

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Commerce city	Los Angeles County	66.3	6,469	12,721	4,184	-	60	4,124	-
Berkeley city	Alameda County	65.9	6,834	13,085	6,691	-	641	5,654	396
Vernon city	Los Angeles County	65.6	6,254	12,506	3,183	-	122	3,061	-
Signal Hill city	Los Angeles County	65.6	7,896	14,147	1,404	-	-	1,404	-
Marina del Rey CDP	Los Angeles County	65.3	6,635	12,886	549	-	-	549	-
Maywood city	Los Angeles County	64.5	6,994	13,245	754	-	-	754	-
Contra Costa Centre CDP	Contra Costa County	64.4	8,344	14,595	407	-	3	404	-
El Segundo city	Los Angeles County	64.2	6,365	12,616	3,496	-	1,107	1,681	709
Burbank CDP	Santa Clara County	64.1	6,468	12,720	262	-	-	262	-
East Los Angeles CDP	Los Angeles County	64.1	7,116	13,367	4,767	-	-	4,767	-
Walnut Park CDP	Los Angeles County	64.0	7,198	13,449	479	-	-	479	-
Santa Ana city	Orange County	63.8	6,555	12,806	17,534	-	165	16,633	736
Albany city	Alameda County	63.7	7,121	13,372	1,145	-	68	1,077	-
Mountain View city	Santa Clara County	63.2	6,285	12,537	7,680	392	304	6,960	25
Bell city	Los Angeles County	63.1	7,212	13,463	1,600	-	-	1,600	-
Hawaiian Gardens city	Los Angeles County	63.0	8,097	14,349	605	-	-	605	-
Alhambra city	Los Angeles County	62.8	7,001	13,252	4,884	-	-	4,884	-
Oakland city	Alameda County	62.6	7,456	13,708	35,715	2,123	10,550	21,648	1,393
Florence-Graham CDP	Los Angeles County	62.6	7,425	13,676	2,248	-	-	2,248	-
Stanford CDP	Santa Clara County	62.6	8,320	14,571	1,748	13	136	1,375	224
Sand City city	Monterey County	62.6	5,756	12,007	360	-	-	360	-
Lawndale city	Los Angeles County	62.6	7,402	13,654	1,263	-	-	1,263	-
Cudahy city	Los Angeles County	62.4	7,200	13,451	753	-	-	753	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Fruitdale CDP	Santa Clara County	62.2	6,802	13,053	175	-	-	175	-
Long Beach city	Los Angeles County	62.1	8,081	14,332	32,400	618	3,024	28,043	715
South El Monte city	Los Angeles County	62.0	7,406	13,657	1,820	-	32	1,788	-
Santa Clara city	Santa Clara County	61.9	6,232	12,484	11,783	-	500	11,283	-
Lennox CDP	Los Angeles County	61.9	7,352	13,603	700	-	-	700	-
Hermosa Beach city	Los Angeles County	61.8	7,766	14,017	913	-	-	913	-
Palo Alto city	Santa Clara County	61.8	6,698	12,949	15,273	7,083	1,277	5,835	1,079
San Fernando city	Los Angeles County	61.8	8,426	14,677	1,519	-	-	1,519	-
National City city	San Diego County	61.8	7,983	14,234	4,665	27	444	4,194	-
Ladera Heights CDP	Los Angeles County	61.8	6,901	13,153	1,898	328	644	771	154
Hawthorne city	Los Angeles County	61.8	7,436	13,687	3,892	-	13	3,879	-
Inglewood city	Los Angeles County	61.7	7,330	13,581	5,804	-	14	5,789	-
Broadmoor CDP	San Mateo County	61.7	7,092	13,344	291	-	-	291	-
Pasadena city	Los Angeles County	61.6	7,768	14,019	14,699	1,350	2,153	10,078	1,118
Torrance city	Los Angeles County	61.5	7,229	13,480	13,185	-	670	12,491	25
Artesia city	Los Angeles County	61.3	8,019	14,270	1,037	-	-	1,037	-
East Pasadena CDP	Los Angeles County	61.3	8,147	14,398	843	-	41	802	-
Bellflower city	Los Angeles County	61.2	7,932	14,183	3,916	-	-	3,916	-
San Mateo city	San Mateo County	61.2	8,322	14,573	7,791	258	1,132	6,298	103
El Monte city	Los Angeles County	61.2	7,827	14,078	6,120	-	272	5,848	-
Daly City city	San Mateo County	61.1	7,204	13,455	4,901	3	155	4,742	-
Sunnyvale city	Santa Clara County	61.1	6,627	12,878	14,063	963	1,364	11,732	4
Los Angeles city	Los Angeles County	61.0	7,482	13,733	299,883	59,744	36,021	192,973	11,145
Colma town	San Mateo County	60.9	7,356	13,607	1,213	-	347	866	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Campbell city	Santa Clara County	60.8	7,082	13,333	3,889	28	410	3,451	-
West Rancho Dominguez CDP	Los Angeles County	60.8	7,594	13,846	2,543	-	-	2,543	-
Bell Gardens city	Los Angeles County	60.8	7,398	13,649	1,573	-	-	1,573	-
Monterey Park city	Los Angeles County	60.8	7,203	13,454	4,910	-	741	4,170	-
South Pasadena city	Los Angeles County	60.8	7,654	13,905	2,180	45	182	1,952	-
Stanton city	Orange County	60.8	7,557	13,808	2,004	-	-	2,004	-
Industry city	Los Angeles County	60.7	8,152	14,403	7,544	-	1,257	6,287	-
Paramount city	Los Angeles County	60.7	7,700	13,951	3,027	-	21	3,005	-
Costa Mesa city	Orange County	60.5	7,044	13,295	10,105	140	1,713	7,927	324
Norwalk city	Los Angeles County	60.4	8,264	14,515	6,214	7	111	6,095	-
South Gate city	Los Angeles County	60.4	7,688	13,939	4,631	-	49	4,582	-
San Leandro city	Alameda County	60.2	8,553	14,804	8,548	600	1,335	6,612	-
Cerritos city	Los Angeles County	60.1	8,202	14,453	5,582	-	2	5,581	-
Los Alamitos city	Los Angeles County	60.1	8,126	14,377	2	-	-	2	-
Buena Park city	Orange County	60.1	8,154	14,406	6,746	-	274	6,472	-
North Fair Oaks CDP	San Mateo County	60.0	7,587	13,838	767	-	7	759	-
Burlingame city	San Mateo County	59.9	8,147	14,398	2,819	200	396	2,052	172
Monterey city	Monterey County	59.9	6,271	12,522	5,519	52	980	4,487	-
Santa Fe Springs city	Los Angeles County	59.8	7,797	14,048	5,679	-	361	5,318	-
Westmont CDP	Los Angeles County	59.7	7,894	14,145	1,182	-	-	1,182	-
Alameda city	Alameda County	59.7	7,592	13,843	6,739	357	1,082	5,292	9
Ashland CDP	Alameda County	59.7	8,934	15,185	1,178	-	-	1,178	-
Glendale city	Los Angeles County	59.7	7,155	13,406	19,480	9,370	1,310	7,965	835

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
East Palo Alto city	San Mateo County	59.6	7,671	13,922	1,613	-	24	1,588	-
Capitola city	Santa Cruz County	59.6	5,952	12,203	1,020	14	94	911	-
Baldwin Park city	Los Angeles County	59.6	8,294	14,545	4,244	-	5	4,239	-
Manhattan Beach city	Los Angeles County	59.6	7,996	14,248	2,520	-	56	2,458	6
South San Francisco city	San Mateo County	59.5	7,655	13,907	5,897	27	447	5,423	-
Rosemead city	Los Angeles County	59.5	7,532	13,783	3,304	-	99	3,205	-
Santa Cruz city	Santa Cruz County	59.5	6,518	12,770	8,154	546	1,721	5,887	-
Downey city	Los Angeles County	59.4	8,194	14,445	7,941	-	476	7,465	-
West Carson CDP	Los Angeles County	59.4	8,175	14,427	1,450	-	-	1,450	-
Alto CDP	Marin County	59.3	8,303	14,554	80	-	-	80	-
Redondo Beach city	Los Angeles County	59.3	7,941	14,192	3,966	-	82	3,884	-
Gardena city	Los Angeles County	59.3	7,367	13,618	3,731	-	493	3,238	-
Midway City CDP	Orange County	59.2	7,798	14,049	398	-	-	398	-
San Pablo city	Contra Costa County	59.1	8,849	15,100	1,671	-	4	1,667	-
Marin City CDP	Marin County	59.0	7,761	14,012	344	-	-	344	-
Tara Hills CDP	Contra Costa County	59.0	9,138	15,389	425	-	5	420	-
Montclair city	San Bernardino County	58.9	9,330	15,581	3,530	-	110	3,420	-
Menlo Park city	San Mateo County	58.9	7,439	13,690	6,377	2	2,808	3,567	-
Live Oak CDP	Santa Cruz County	58.9	5,633	11,884	2,075	240	327	1,509	-
Lakewood city	Los Angeles County	58.8	8,437	14,689	6,023	-	84	5,939	-
Westminster city	Orange County	58.8	7,864	14,115	6,438	-	625	5,812	-
Lynwood city	Los Angeles County	58.8	7,991	14,243	3,098	-	92	3,005	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
West Puente Valley CDP	Los Angeles County	58.6	8,574	14,826	1,196	-	-	1,196	-
Watsonville city	Santa Cruz County	58.6	7,722	13,973	4,280	65	664	3,551	-
West Athens CDP	Los Angeles County	58.6	7,937	14,188	855	-	0	855	-
Garden Grove city	Orange County	58.4	7,650	13,901	11,459	18	105	11,336	-
Sausalito city	Marin County	58.3	7,202	13,478	1,133	16	193	924	-
San Gabriel city	Los Angeles County	58.3	7,659	13,910	2,653	9	168	2,476	-
Hayward city	Alameda County	58.1	9,084	15,335	29,132	12,204	3,665	13,263	-
Santa Barbara city	Santa Barbara County	58.1	5,292	11,543	12,478	2,961	1,894	7,364	259
Fountain Valley city	Orange County	58.1	7,567	13,818	5,801	-	787	5,014	-
View Park-Windsor Hills CDP	Los Angeles County	58.0	7,668	13,919	1,178	-	111	1,067	-
Cypress city	Orange County	58.0	8,218	14,469	4,219	-	38	4,180	-
Willowbrook CDP	Los Angeles County	58.0	8,115	14,367	990	-	21	969	-
Rollingwood CDP	Contra Costa County	58.0	9,134	15,385	108	-	-	108	-
San Luis Obispo city	San Luis Obispo County	57.9	5,661	11,912	8,435	1,265	1,967	5,203	-
San Bruno city	San Mateo County	57.9	8,370	14,621	3,500	40	1,146	2,314	-
Alondra Park CDP	Los Angeles County	57.9	8,102	14,354	708	-	212	496	-
La Riviera CDP	Sacramento County	57.9	7,414	13,665	1,216	-	63	1,153	-
La Puente city	Los Angeles County	57.8	8,703	14,955	2,226	-	178	2,048	-
Lomita city	Los Angeles County	57.7	8,790	15,041	1,224	-	-	1,224	-
Montalvin Manor CDP	Contra Costa County	57.6	9,327	15,579	206	-	-	206	-
Los Alamitos city	Orange County	57.6	8,145	14,396	2,585	1,060	146	1,379	-
North El Monte CDP	Los Angeles County	57.5	8,628	14,880	271	-	-	271	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Cambrian Park CDP	Santa Clara County	57.5	8,017	14,268	382	-	57	324	-
Carmel-by-the-Sea city	Monterey County	57.4	10,197	16,452	682	-	7	676	-
Airport CDP	Stanislaus County	57.3	8,969	15,220	366	-	-	366	-
Covina city	Los Angeles County	57.3	9,170	15,422	4,498	102	670	3,726	-
El Cerrito city	Contra Costa County	57.3	8,631	14,882	2,359	-	1,099	1,260	-
Del Mar city	San Diego County	57.2	8,166	14,418	1,092	-	77	1,016	-
Del Aire CDP	Los Angeles County	57.2	7,704	13,955	649	-	148	500	-
Compton city	Los Angeles County	57.1	8,281	14,532	6,418	-	348	6,070	-
Redwood City city	San Mateo County	57.1	7,952	14,203	12,300	3,297	4,478	4,316	210
South San Jose Hills CDP	Los Angeles County	57.1	9,069	15,320	965	-	36	930	-
West Covina city	Los Angeles County	57.1	9,220	15,471	10,266	635	1,576	8,056	-
Twin Lakes CDP	Santa Cruz County	57.0	6,233	12,484	442	-	-	442	-
Tustin city	Orange County	57.0	7,628	13,879	7,122	514	1,414	5,194	-
Carson city	Los Angeles County	57.0	8,095	14,346	11,984	58	2,564	9,362	-
Anaheim city	Orange County	57.0	8,331	14,582	32,217	6,906	3,700	20,956	656
Charter Oak CDP	Los Angeles County	56.9	9,372	15,623	594	-	25	568	-
Duarte city	Los Angeles County	56.7	9,074	15,325	4,290	1,970	966	1,354	-
Irwindale city	Los Angeles County	56.7	8,466	14,717	5,646	1,392	1,008	3,246	-
Union City city	Alameda County	56.7	9,133	15,384	12,462	5,707	1,762	4,993	-
Milpitas city	Santa Clara County	56.7	7,654	13,905	8,728	1,874	661	6,193	-
Temple City city	Los Angeles County	56.7	8,177	14,428	2,563	-	29	2,534	-
La Palma city	Orange County	56.5	8,590	14,841	1,148	-	47	1,101	-
Ukiah city	Mendocino County	56.5	6,099	13,114	2,973	261	658	2,055	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Sacramento city	Sacramento County	56.4	7,473	13,724	62,545	4,315	18,273	38,670	1,287
Fullerton city	Orange County	56.4	8,333	14,584	14,328	532	3,125	10,671	-
San Pasqual CDP	Los Angeles County	56.4	8,625	14,876	163	-	8	155	-
La Habra city	Orange County	56.4	9,045	15,296	4,709	46	242	4,420	-
Pomona city	Los Angeles County	56.3	9,404	15,655	14,690	229	3,710	10,750	-
Larkspur city	Marin County	56.3	8,733	14,985	1,938	329	58	1,551	-
Carpinteria city	Santa Barbara County	56.3	7,557	14,572	1,656	-	79	1,577	-
Foster City city	San Mateo County	56.3	8,616	14,867	2,429	-	878	1,442	109
Hawaiian Gardens city	Orange County	56.1	8,996	15,247	1	-	-	1	-
Cherryland CDP	Alameda County	56.0	9,299	15,550	767	-	34	733	-
Piedmont city	Alameda County	56.0	8,515	14,766	1,078	-	101	977	-
La Mesa city	San Diego County	55.8	8,073	14,324	5,820	345	633	4,843	-
Santa Maria city	Santa Barbara County	55.8	7,031	13,282	14,582	2,161	5,550	6,872	-
Eureka city	Humboldt County	55.8	5,251	11,502	6,006	1,142	1,618	3,246	-
Parkway CDP	Sacramento County	55.7	8,368	14,620	1,538	-	220	1,318	-
Isla Vista CDP	Santa Barbara County	55.6	11,067	17,318	1,186	20	152	1,013	-
Salinas city	Monterey County	55.6	7,131	13,382	14,692	2,344	2,631	9,717	-
University of California-Davis CDP	Yolo County	55.6	11,307	17,558	936	-	318	618	-
Parklawn CDP	Stanislaus County	55.6	8,619	14,870	106	-	-	106	-
Brea city	Orange County	55.5	8,651	14,902	7,930	3,314	646	3,970	-
Vincent CDP	Los Angeles County	55.5	9,128	15,379	942	0	90	852	-
Citrus CDP	Los Angeles County	55.5	9,491	15,742	568	-	87	480	-
Mayflower Village CDP	Los Angeles County	55.5	9,036	15,288	441	-	19	422	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Avocado Heights CDP	Los Angeles County	55.4	8,561	14,812	1,732	32	515	1,185	-
Fremont city	Santa Clara County	55.4	7,854	14,105	0	-	-	0	-
El Cajon city	San Diego County	55.4	8,778	15,029	9,264	354	2,391	6,519	-
East San Gabriel CDP	Los Angeles County	55.4	8,477	14,728	999	-	171	828	-
Pleasure Point CDP	Santa Cruz County	55.3	6,665	12,916	479	-	10	469	-
Pacific Grove city	Monterey County	55.3	7,256	13,507	1,834	-	650	1,184	-
Alum Rock CDP	Santa Clara County	55.1	8,206	14,457	537	-	113	424	-
San Jose city	Santa Clara County	55.1	8,129	14,380	113,808	36,870	15,085	59,806	2,047
Davis city	Yolo County	55.1	8,657	14,908	6,325	30	1,441	4,854	-
Saticoy CDP	Ventura County	55.1	10,394	16,645	240	-	-	240	-
Loma Linda city	San Bernardino County	55.1	6,896	13,148	4,920	1,890	569	2,440	21
San Rafael city	Marin County	55.1	9,032	15,284	10,688	2,551	2,628	5,509	-
Bayview CDP	Contra Costa County	55.0	9,726	15,977	195	-	-	195	-
Belmont city	San Mateo County	54.9	8,931	15,182	2,961	60	1,019	1,882	-
Marysville city	Yuba County	54.9	9,626	15,877	2,217	212	850	1,155	-
Placentia city	Orange County	54.9	9,086	15,337	4,219	85	731	3,404	-
Lemon Grove city	San Diego County	54.8	8,324	14,575	2,482	-	442	2,040	-
San Anselmo town	Marin County	54.8	9,606	15,858	1,713	247	191	1,276	-
Imperial Beach city	San Diego County	54.8	9,664	15,916	2,749	1,421	20	1,308	-
Modesto city	Stanislaus County	54.7	7,465	13,716	27,560	4,413	7,414	15,733	-
Brisbane city	San Mateo County	54.7	7,485	13,736	1,953	-	492	1,461	-
Pacheco CDP	Contra Costa County	54.6	9,201	15,452	474	40	6	428	-
East Rancho Dominguez CDP	Los Angeles County	54.6	8,673	14,924	526	-	-	526	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Newport Beach city	Orange County	54.5	8,299	14,550	15,258	4,923	3,501	6,345	489
Calwa CDP	Fresno County	54.5	7,905	14,156	391	-	104	288	-
San Carlos city	San Mateo County	54.4	8,566	14,817	3,538	93	1,944	1,501	-
Grover Beach city	San Luis Obispo County	54.4	7,926	14,177	1,478	-	518	960	-
Huntington Beach city	Orange County	54.3	8,596	14,848	17,266	529	3,141	13,596	-
Arcadia city	Los Angeles County	54.3	8,841	15,092	6,992	331	2,150	4,511	-
Orange city	Orange County	54.2	8,151	14,402	16,198	3,863	2,050	9,875	410
Goleta city	Santa Barbara County	54.2	7,151	13,402	5,014	2	2,411	2,601	-
Visalia city	Tulare County	54.0	7,356	13,608	24,009	3,629	6,028	14,352	-
Cupertino city	Santa Clara County	53.9	7,769	14,020	7,228	1,771	1,661	3,331	465
La Mirada city	Los Angeles County	53.9	8,955	15,206	5,007	37	982	3,988	-
Monrovia city	Los Angeles County	53.9	8,833	15,084	8,731	5,951	606	2,173	-
Lemon Hill CDP	Sacramento County	53.9	8,480	14,731	1,042	-	68	975	-
Richmond city	Contra Costa County	53.8	9,005	15,256	19,228	5,929	4,524	8,774	-
San Diego city	San Diego County	53.8	8,187	14,438	208,495	77,001	41,596	86,711	3,187
South Monrovia Island CDP	Los Angeles County	53.6	8,909	15,160	351	-	38	313	-
Pleasanton city	Alameda County	53.6	10,027	16,278	15,279	3,596	5,489	6,119	76
Old Fig Garden CDP	Fresno County	53.5	7,381	13,632	1,062	-	495	566	-
Lake Forest city	Orange County	53.5	8,783	15,034	10,722	2,891	2,040	5,791	-
North Highlands CDP	Sacramento County	53.5	8,442	14,694	5,644	81	1,595	3,967	-
Fremont city	Alameda County	53.5	9,103	15,354	49,575	23,223	9,624	16,647	81
Oxnard city	Ventura County	53.4	7,702	13,953	17,235	1,888	4,300	11,048	-
San Bernardino city	San Bernardino County	53.3	8,736	14,988	38,540	11,173	6,716	20,353	298

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						Less than 25	25 - 50	50 - 75	75 and Greater
Laguna Beach city	Orange County	53.3	9,422	15,673	5,697	1,007	3,280	1,410	-
Mayfair CDP	Fresno County	53.3	7,434	13,685	333	-	-	333	-
Fruitridge Pocket CDP	Sacramento County	53.2	8,398	14,649	389	-	-	389	-
Yountville city	Napa County	53.2	8,061	15,077	862	23	413	426	-
Boronda CDP	Monterey County	53.2	6,953	13,205	370	-	11	358	-
San Lorenzo CDP	Alameda County	53.2	9,486	15,737	1,776	-	620	1,157	-
Chico city	Butte County	53.1	5,798	12,050	21,100	6,689	5,814	8,597	-
Napa city	Napa County	53.1	7,922	14,173	11,321	2,102	3,848	5,371	-
Seacliff CDP	Santa Cruz County	53.0	7,424	13,675	467	3	216	248	-
Arden-Arcade CDP	Sacramento County	53.0	7,820	14,071	11,425	582	2,382	8,460	-
Petaluma city	Sonoma County	53.0	8,896	15,147	9,205	517	3,199	5,488	-
Valinda CDP	Los Angeles County	52.9	9,625	15,876	1,289	-	276	1,013	-
Malaga CDP	Fresno County	52.9	8,442	14,693	175	-	-	175	-
Bostonia CDP	San Diego County	52.9	9,077	15,328	1,234	-	413	821	-
Lodi city	San Joaquin County	52.8	8,510	14,761	8,710	956	2,922	4,833	-
Dinuba city	Tulare County	52.8	8,151	15,166	4,141	973	1,111	2,057	-
El Rio CDP	Ventura County	52.8	9,033	15,285	1,295	-	700	595	-
Ontario city	San Bernardino County	52.7	9,638	15,889	31,976	5,368	10,185	16,422	-
Azusa city	Los Angeles County	52.7	9,638	15,889	6,187	1,786	1,113	3,288	-
Freedom CDP	Santa Cruz County	52.7	8,479	14,730	737	-	384	353	-
Crescent City city	Del Norte County	52.7	7,588	14,603	1,256	10	246	1,000	-
Strawberry CDP	Marin County	52.5	8,683	14,934	851	118	83	650	-
Pleasant Hill city	Contra Costa County	52.5	9,489	15,740	4,528	266	1,358	2,904	-
Mountain View CDP	Contra Costa County	52.5	9,300	15,551	184	-	59	125	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Lincoln Village CDP	San Joaquin County	52.5	8,122	14,373	471	-	163	308	-
Saranap CDP	Contra Costa County	52.4	9,315	15,566	726	-	274	452	-
Corte Madera town	Marin County	52.3	8,865	15,116	2,025	20	710	1,294	-
Woodland city	Yolo County	52.3	8,828	15,080	9,809	2,061	2,963	4,786	-
Los Altos city	Santa Clara County	52.3	8,188	14,439	4,145	7	1,952	2,186	-
Glendora city	Los Angeles County	52.2	9,752	16,004	12,484	5,308	2,736	4,441	-
Seaside city	Monterey County	52.2	7,528	13,779	5,913	1,452	2,738	1,722	-
Newark city	Alameda County	52.1	9,163	15,414	8,880	3,446	1,968	3,466	-
Cotati city	Sonoma County	52.1	8,559	14,810	1,203	-	437	766	-
Rosemont CDP	Sacramento County	52.1	8,255	14,506	2,799	-	1,012	1,786	-
Pinole city	Contra Costa County	52.1	9,987	16,239	3,276	105	1,425	1,746	-
San Buenaventura (Ventura) city	Ventura County	52.1	8,426	14,677	13,977	1,819	3,913	8,244	-
Vista city	San Diego County	52.0	8,941	15,193	12,095	1,393	3,006	7,696	-
Porterville city	Tulare County	52.0	8,634	14,885	12,068	2,420	5,139	4,509	-
Chula Vista city	San Diego County	52.0	9,231	15,482	31,765	10,666	5,635	15,464	-
Riverside city	Riverside County	52.0	8,560	14,811	51,986	11,499	16,728	23,365	393
Laguna Hills city	Orange County	51.9	9,039	15,290	4,247	655	955	2,636	-
Merced city	Merced County	51.9	9,304	15,555	14,865	4,014	4,709	6,142	-
South San Gabriel CDP	Los Angeles County	51.9	8,252	14,503	533	-	189	344	-
Dana Point city	Orange County	51.9	9,899	16,150	4,149	7	1,495	2,647	-
Del Rey Oaks city	Monterey County	51.9	6,635	12,887	309	-	217	93	-
Rohnert Park city	Sonoma County	51.8	8,505	14,756	4,482	2	2,183	2,297	-
Bystrom CDP	Stanislaus County	51.8	8,736	14,987	452	-	85	367	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Home Gardens CDP	Riverside County	51.7	9,618	15,870	989	293	49	647	-
Kensington CDP	Contra Costa County	51.7	9,245	15,496	606	-	199	407	-
Pico Rivera city	Los Angeles County	51.7	8,617	14,868	5,309	44	1,781	3,483	-
Sebastopol city	Sonoma County	51.5	7,739	14,755	1,190	27	496	667	-
Walnut city	Los Angeles County	51.4	9,765	16,016	5,755	439	2,664	2,652	-
Tulare city	Tulare County	51.4	8,543	14,794	12,937	2,286	5,933	4,718	-
San Marino city	Los Angeles County	51.4	8,741	14,992	2,410	15	799	1,596	-
Stevenson Ranch CDP	Los Angeles County	51.4	10,320	16,572	4,068	1,249	2,225	594	-
McClellan Park CDP	Sacramento County	51.1	8,342	14,593	2,593	605	1,191	797	-
Oildale CDP	Kern County	51.1	7,305	13,556	4,181	487	1,048	2,646	-
Stockton city	San Joaquin County	51.1	8,811	15,062	39,347	6,820	15,181	17,004	342
Pittsburg city	Contra Costa County	51.0	10,920	17,171	10,963	1,979	3,696	5,288	-
Upland city	San Bernardino County	51.0	10,026	16,277	9,984	1,524	3,362	5,098	-
Sonora city	Tuolumne County	51.0	9,503	16,519	1,961	73	967	921	-
Santa Rosa city	Sonoma County	50.9	7,316	13,567	27,203	4,072	10,793	12,338	-
Claremont city	Los Angeles County	50.9	9,915	16,166	8,545	4,199	1,600	2,746	-
Oceanside city	San Diego County	50.8	9,840	16,091	26,291	6,894	7,296	12,101	-
Belvedere city	Marin County	50.8	8,209	14,460	332	25	112	196	-
Rancho Cordova city	Sacramento County	50.8	8,721	14,972	22,406	11,555	4,196	6,655	-
Westlake Village city	Los Angeles County	50.8	9,277	15,528	3,318	1,521	283	1,515	-
Fresno city	Fresno County	50.7	7,971	14,222	72,981	16,181	16,095	40,190	515
La Verne city	Los Angeles County	50.7	9,913	16,165	5,402	2,164	727	2,511	-
Lakeport city	Lake County	50.7	7,626	14,641	1,957	154	1,294	510	-
Rialto city	San Bernardino County	50.7	8,848	15,100	15,126	2,226	5,810	7,090	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Delano city	Kern County	50.6	8,090	14,341	9,141	2,599	4,424	2,118	-
Soquel CDP	Santa Cruz County	50.6	7,536	13,787	2,943	1,481	436	1,026	-
Fort Bragg city	Mendocino County	50.6	6,837	13,853	1,755	93	486	1,176	-
Colton city	San Bernardino County	50.6	8,466	14,717	9,950	3,180	1,707	5,063	-
Arcata city	Humboldt County	50.5	7,143	14,158	5,727	2,453	1,808	1,466	-
Long Beach city	Orange County	50.4	9,935	16,186	4	-	-	4	-
Sonoma city	Sonoma County	50.4	7,906	14,921	1,755	84	519	1,152	-
Antioch city	Contra Costa County	50.4	11,361	17,612	18,753	5,695	4,278	8,781	-
Grass Valley city	Nevada County	50.4	7,496	14,511	3,375	249	1,201	1,924	-
Vallejo city	Solano County	50.2	9,591	15,842	19,629	5,414	7,366	6,849	-
Montebello city	Los Angeles County	50.2	8,080	14,332	5,332	4	2,658	2,670	-
Rolling Hills Estates city	Los Angeles County	50.2	10,696	16,947	2,203	1	1,505	697	-
Dublin city	Alameda County	50.1	10,312	16,563	9,642	1,811	4,623	3,208	-
Chino city	San Bernardino County	50.1	10,007	16,258	18,964	6,026	6,020	6,918	-
Altadena CDP	Los Angeles County	50.0	9,573	15,825	5,442	1,308	1,683	2,450	-
Cutler CDP	Tulare County	49.9	8,371	15,386	516	-	386	130	-
Exeter city	Tulare County	49.9	8,433	15,448	1,576	78	914	584	-
Escondido city	San Diego County	49.8	9,832	16,083	23,925	9,679	6,464	7,782	-
Diamond Bar city	Los Angeles County	49.8	9,911	16,162	9,523	2,767	3,241	3,515	-
Whittier city	Los Angeles County	49.7	8,897	15,148	9,375	2,578	2,925	3,872	-
Hacienda Heights CDP	Los Angeles County	49.5	9,668	15,919	7,154	2,573	1,316	3,265	-
Casa Conejo CDP	Ventura County	49.4	8,996	15,247	301	-	226	75	-
Castroville CDP	Monterey County	49.3	8,463	15,478	654	-	457	197	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Placerville city	El Dorado County	49.3	8,734	15,750	3,711	522	1,468	1,721	-
West Sacramento city	Yolo County	49.2	8,602	14,853	13,731	3,014	5,725	4,970	23
Aptos CDP	Santa Cruz County	49.2	8,170	14,490	4,160	2,386	387	1,387	-
August CDP	San Joaquin County	49.2	9,016	15,267	799	-	502	297	-
Pajaro CDP	Monterey County	49.1	8,413	15,429	593	-	173	420	-
Martinez city	Contra Costa County	49.1	9,544	15,795	8,256	2,904	2,031	3,321	-
Irvine city	Orange County	49.1	8,333	14,584	42,305	17,013	8,540	15,575	1,178
Agoura Hills city	Los Angeles County	49.0	9,478	15,729	4,993	924	1,991	2,078	-
Suisun City city	Solano County	49.0	10,249	16,501	2,627	74	1,637	917	-
Mission Viejo city	Orange County	49.0	9,784	16,035	11,383	950	5,638	4,796	-
West Whittier-Los Nietos CDP	Los Angeles County	49.0	8,914	15,165	1,612	-	849	763	-
San Dimas city	Los Angeles County	49.0	9,758	16,009	9,624	4,603	2,545	2,475	-
Turlock city	Stanislaus County	49.0	8,579	14,830	10,824	2,300	2,428	6,097	-
Marina city	Monterey County	49.0	9,003	15,254	5,689	1,994	1,868	1,827	-
Lompoc city	Santa Barbara County	48.9	10,367	16,618	7,441	2,582	2,515	2,345	-
El Sobrante CDP	Contra Costa County	48.9	10,246	16,497	1,770	-	1,028	742	-
Coronado city	San Diego County	48.9	10,057	16,308	5,108	2,852	859	1,397	-
King City city	Monterey County	48.9	9,137	16,152	2,493	596	991	907	-
Moss Landing CDP	Monterey County	48.8	8,516	15,531	254	-	88	166	-
Pacifica city	San Mateo County	48.8	9,705	15,956	8,100	2,710	3,667	1,722	-
Nevada City city	Nevada County	48.7	7,976	14,991	1,396	101	581	713	-
West Modesto CDP	Stanislaus County	48.7	10,188	16,439	913	377	135	402	-
Boyes Hot Springs CDP	Sonoma County	48.7	8,252	15,267	679	-	367	311	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Solana Beach city	San Diego County	48.6	9,144	15,395	2,246	548	295	1,403	-
Hercules city	Contra Costa County	48.6	10,467	16,718	4,090	594	2,055	1,441	-
Lindsay city	Tulare County	48.6	8,361	15,376	1,739	72	1,011	656	-
Livermore city	Alameda County	48.5	9,591	15,842	17,395	2,136	7,468	7,792	-
Pismo Beach city	San Luis Obispo County	48.5	8,621	14,872	2,303	157	1,306	840	-
Jackson city	Amador County	48.5	9,611	16,627	2,362	372	1,475	515	-
Encinitas city	San Diego County	48.4	9,296	15,547	12,046	2,583	4,898	4,565	-
Santa Clarita city	Los Angeles County	48.4	10,122	16,377	39,913	11,007	15,574	13,332	-
Florin CDP	Sacramento County	48.4	8,949	15,200	5,573	598	2,164	2,811	-
Bay Point CDP	Contra Costa County	48.3	11,073	17,324	4,117	1,206	1,829	1,081	-
La Crescenta-Montrose CDP	Los Angeles County	48.2	9,451	15,702	2,194	1,003	164	1,027	-
Palm Springs city	Riverside County	48.2	9,498	15,749	60,140	48,066	3,357	8,717	-
Willits city	Mendocino County	48.1	8,246	15,261	1,802	130	1,096	576	-
Rancho Palos Verdes city	Los Angeles County	48.1	10,835	17,087	8,622	1,442	5,028	2,152	-
Hanford city	Kings County	48.1	8,956	15,207	11,067	2,362	5,832	2,874	-
Los Gatos town	Santa Clara County	48.0	9,177	15,428	7,313	3,276	1,262	2,775	-
St. Helena city	Napa County	48.0	7,956	14,972	3,170	1,023	1,437	711	-
Aliso Viejo city	Orange County	48.0	8,701	14,952	4,352	189	2,539	1,625	-
Farmersville city	Tulare County	48.0	8,652	15,667	1,445	45	1,077	323	-
Rouse CDP	Stanislaus County	47.9	10,276	16,527	153	-	114	39	-
Carmichael CDP	Sacramento County	47.9	8,925	15,177	8,578	1,102	3,358	4,119	-
Fontana city	San Bernardino County	47.9	9,541	15,793	27,598	5,271	9,887	12,440	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Half Moon Bay city	San Mateo County	47.8	8,606	15,622	4,113	1,004	2,286	824	-
Foothill Farms CDP	Sacramento County	47.7	9,168	15,419	2,687	20	1,279	1,388	-
North Richmond CDP	Contra Costa County	47.7	9,976	16,227	881	100	490	291	-
Goshen CDP	Tulare County	47.7	8,930	15,929	1,140	362	367	410	-
Kennedy CDP	San Joaquin County	47.7	9,042	15,294	776	-	639	137	-
Morro Bay city	San Luis Obispo County	47.6	8,877	15,893	3,394	367	2,051	975	-
Windsor town	Sonoma County	47.6	8,287	15,302	4,653	368	2,383	1,902	-
Millbrae city	San Mateo County	47.6	9,422	15,673	2,081	456	717	871	36
Lemoore city	Kings County	47.6	8,974	15,989	5,450	1,311	2,686	1,452	-
Concord city	Contra Costa County	47.4	10,172	16,423	19,618	6,032	5,102	8,484	-
Red Bluff city	Tehama County	47.3	8,942	15,958	4,839	760	3,246	833	-
Port Hueneme city	Ventura County	47.1	10,481	16,734	2,832	465	1,238	1,129	-
Coronita CDP	Riverside County	47.1	9,221	15,472	400	9	236	155	-
Laguna Woods city	Orange County	47.0	10,141	16,392	2,173	442	449	1,281	-
Gilroy city	Santa Clara County	47.0	11,508	17,759	10,510	4,575	2,552	3,383	-
Hollister city	San Benito County	47.0	9,664	15,916	4,691	578	2,672	1,440	-
Garden Acres CDP	San Joaquin County	47.0	9,627	15,878	1,654	18	1,127	509	-
Rancho Cucamonga city	San Bernardino County	46.9	10,494	16,745	25,690	6,481	5,788	13,421	-
Novato city	Marin County	46.9	10,688	16,939	17,566	7,995	5,247	4,324	-
Atwater city	Merced County	46.9	8,882	15,897	3,884	276	2,011	1,598	-
Healdsburg city	Sonoma County	46.9	8,583	15,599	2,852	458	1,360	1,035	-
Sierra Madre city	Los Angeles County	46.9	9,825	16,076	1,890	904	140	846	-
Seal Beach city	Orange County	46.8	9,945	16,196	7,199	3,264	1,643	2,292	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Bakersfield city	Kern County	46.8	7,669	13,920	95,357	49,712	18,125	27,328	192
La Presa CDP	San Diego County	46.8	9,622	15,873	3,518	563	1,205	1,749	-
Moorpark city	Ventura County	46.7	9,398	15,649	8,051	2,610	3,574	1,867	-
Earlimart CDP	Tulare County	46.7	10,001	17,016	1,348	362	878	107	-
Vacaville city	Solano County	46.6	10,507	16,758	18,519	5,185	6,649	6,685	-
Bret Harte CDP	Stanislaus County	46.6	9,764	16,015	352	-	237	115	-
Orosi CDP	Tulare County	46.5	8,583	15,599	1,565	99	1,123	343	-
El Paso de Robles (Paso Robles) city	San Luis Obispo County	46.5	8,610	15,625	12,427	6,658	4,199	1,570	-
Elk Grove city	Sacramento County	46.4	10,112	16,364	26,865	7,933	12,387	6,545	-
Laguna Niguel city	Orange County	46.4	9,947	16,199	9,388	1,951	4,754	2,683	-
Mill Valley city	Marin County	46.4	9,605	15,856	3,048	1,139	596	1,313	-
Highgrove CDP	Riverside County	46.3	9,431	15,714	2,060	1,139	579	342	-
Fairfax town	Marin County	46.3	10,504	16,771	1,410	469	403	538	-
Greenacres CDP	Kern County	46.2	7,453	13,705	1,260	53	879	329	-
Citrus Heights city	Sacramento County	46.2	9,450	15,701	9,107	1,519	2,181	5,407	-
Cloverdale city	Sonoma County	46.1	9,559	16,575	1,991	325	1,571	95	-
Fairview CDP	Alameda County	46.1	10,732	16,983	1,773	372	870	531	-
Roseville city	Placer County	46.0	9,777	16,028	26,106	7,449	9,583	9,074	-
Tracy city	San Joaquin County	46.0	10,844	17,095	13,768	4,747	4,374	4,647	-
East Whittier CDP	Los Angeles County	46.0	9,721	15,972	698	-	401	297	-
Carlsbad city	San Diego County	45.9	9,882	16,133	24,156	2,992	10,978	10,187	-
Scotts Valley city	Santa Cruz County	45.9	8,933	15,948	2,941	1,046	292	1,602	-
Winton CDP	Merced County	45.9	9,144	16,160	1,946	178	1,234	534	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Taft Mosswood CDP	San Joaquin County	45.8	9,409	15,660	303	-	303	-	-
Vine Hill CDP	Contra Costa County	45.8	10,024	16,275	964	38	603	323	-
Tarpey Village CDP	Fresno County	45.7	8,320	14,571	509	-	475	34	-
Simi Valley city	Ventura County	45.7	10,366	16,617	26,575	13,776	6,315	6,484	-
Palos Verdes Estates city	Los Angeles County	45.7	10,932	17,183	3,055	-	2,902	153	-
Bloomington CDP	San Bernardino County	45.7	9,154	15,405	3,866	299	2,407	1,161	-
Larkfield-Wikiup CDP	Sonoma County	45.6	8,107	14,594	3,397	1,591	1,011	795	-
Myrtletown CDP	Humboldt County	45.6	5,751	12,002	1,343	270	788	286	-
Castro Valley CDP	Alameda County	45.5	10,339	16,590	10,592	5,711	1,808	3,074	-
Walnut Creek city	Contra Costa County	45.5	10,170	16,421	12,641	5,430	2,269	4,645	298
Avalon city	Los Angeles County	45.5	8,133	15,149	1,844	217	1,243	384	-
Atherton town	San Mateo County	45.4	9,615	15,866	3,238	246	1,735	1,257	-
Summerland CDP	Santa Barbara County	45.4	9,723	15,974	1,269	517	690	62	-
Rose Hills CDP	Los Angeles County	45.4	9,893	16,144	276	25	144	107	-
Gonzales city	Monterey County	45.4	8,921	15,936	1,228	555	175	498	-
Redding city	Shasta County	45.3	6,243	12,494	38,118	15,113	17,746	5,259	-
Indian Wells city	Riverside County	45.3	11,051	17,302	9,166	6,779	467	1,920	-
Brentwood city	Contra Costa County	45.2	11,651	17,902	9,513	1,843	4,744	2,926	-
Acalanes Ridge CDP	Contra Costa County	45.2	9,945	16,196	295	127	63	105	-
Greenfield CDP	Kern County	45.2	8,732	14,983	904	-	904	-	-
Hemet city	Riverside County	45.2	11,115	17,378	18,748	8,495	5,768	4,485	-
Eldridge CDP	Sonoma County	45.2	8,929	15,945	417	-	338	79	-
Tiburon town	Marin County	45.1	9,279	15,530	2,894	1,282	1,078	534	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Mammoth Lakes town	Mono County	45.0	8,403	15,419	15,895	11,535	2,394	1,966	-
Dollar Point CDP	Placer County	45.0	10,414	17,429	1,046	11	1,036	-	-
East Sonora CDP	Tuolumne County	45.0	9,662	16,678	1,585	276	810	500	-
Moreno Valley city	Riverside County	45.0	10,182	16,433	32,806	13,061	10,241	9,504	-
Yuba City city	Sutter County	45.0	10,295	16,547	9,522	1,931	3,669	3,921	-
West Menlo Park CDP	San Mateo County	44.9	9,504	15,755	313	-	248	65	-
Spring Valley CDP	San Diego County	44.9	9,873	16,125	4,696	1,648	1,466	1,583	-
Arroyo Grande city	San Luis Obispo County	44.9	8,916	15,168	3,734	1,241	1,005	1,489	-
Country Club CDP	San Joaquin County	44.9	9,283	15,534	1,227	179	912	136	-
Oceano CDP	San Luis Obispo County	44.9	9,140	15,391	980	46	908	26	-
Madera city	Madera County	44.9	9,385	15,636	10,102	3,021	4,885	2,196	-
Reedley city	Fresno County	44.9	8,392	15,407	3,542	554	1,592	1,395	-
Kings Beach CDP	Placer County	44.8	10,669	17,685	2,201	1,511	274	416	-
Woodlake city	Tulare County	44.8	9,107	16,123	1,511	592	517	402	-
Benicia city	Solano County	44.7	9,448	15,699	8,275	1,240	5,551	1,483	-
San Marcos city	San Diego County	44.7	9,652	15,903	15,579	6,231	2,906	6,442	-
Ivanhoe CDP	Tulare County	44.6	9,137	16,152	1,289	317	972	-	-
El Verano CDP	Sonoma County	44.5	8,831	15,847	732	290	332	110	-
South Whittier CDP	Los Angeles County	44.4	9,481	15,733	3,416	83	2,029	1,304	-
Moss Beach CDP	San Mateo County	44.4	9,626	16,642	1,436	-	1,404	32	-
Rio del Mar CDP	Santa Cruz County	44.4	8,920	15,171	1,920	157	1,258	505	-
Rossmoor CDP	Orange County	44.3	9,736	15,988	1,005	73	431	501	-
Redlands city	San Bernardino County	44.3	8,845	15,097	23,007	12,383	5,280	5,344	-
Susanville city	Lassen County	44.3	8,367	15,383	5,084	1,204	3,610	270	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Rowland Heights CDP	Los Angeles County	44.3	9,950	16,201	8,368	5,056	1,070	2,242	-
McFarland city	Kern County	44.1	8,178	15,194	1,708	428	797	483	-
Fetters Hot Springs-Agua Caliente CDP	Sonoma County	44.1	8,902	15,918	935	439	492	4	-
Thousand Oaks city	Ventura County	44.1	9,413	15,665	35,856	19,811	9,630	6,415	-
Livingston city	Merced County	43.9	8,943	15,958	2,345	772	974	599	-
Salida CDP	Stanislaus County	43.9	9,363	15,614	3,391	640	2,092	659	-
Tipton CDP	Tulare County	43.9	9,820	16,835	646	-	646	-	-
Ross town	Marin County	43.8	10,865	17,137	996	244	166	587	-
Grand Terrace city	San Bernardino County	43.8	8,986	15,237	2,242	512	792	938	-
Oroville city	Butte County	43.8	9,066	15,385	8,797	2,542	4,287	1,968	-
Kentfield CDP	Marin County	43.7	10,385	16,637	1,936	786	389	761	-
Strathmore CDP	Tulare County	43.7	9,508	16,524	900	161	739	-	-
Fortuna city	Humboldt County	43.7	8,955	15,971	3,437	789	1,699	950	-
Cathedral City city	Riverside County	43.7	9,206	15,457	14,415	7,900	3,329	3,186	-
Fairfield city	Solano County	43.7	10,501	16,752	26,052	11,578	7,586	6,889	-
Folsom city	Sacramento County	43.6	10,068	16,319	17,770	5,686	7,161	4,923	-
Tamalpais-Homestead Valley CDP	Marin County	43.5	9,746	16,024	2,999	1,616	914	469	-
South Lake Tahoe city	El Dorado County	43.5	8,357	14,609	6,526	1,745	2,833	1,948	-
North Auburn CDP	Placer County	43.4	8,909	15,924	4,999	1,225	2,862	912	-
Crockett CDP	Contra Costa County	43.4	10,854	17,105	680	82	409	189	-
Ceres city	Stanislaus County	43.4	8,545	14,796	5,920	778	2,931	2,210	-
Fair Oaks CDP	Sacramento County	43.4	9,989	16,240	6,963	1,905	3,607	1,451	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Orcutt CDP	Santa Barbara County	43.4	9,465	15,716	7,120	2,393	4,445	282	-
Corning city	Tehama County	43.3	9,354	16,369	2,272	715	1,556	-	-
Carnelian Bay CDP	Placer County	43.2	11,436	18,451	831	276	555	-	-
El Granada CDP	San Mateo County	43.2	9,645	16,661	3,090	2,504	570	17	-
Lamont CDP	Kern County	43.2	8,869	15,885	2,938	1,466	1,023	448	-
Graton CDP	Sonoma County	43.1	8,930	15,946	1,011	261	750	-	-
Clyde CDP	Contra Costa County	43.1	9,948	16,199	91	-	17	74	-
Highland city	San Bernardino County	43.0	9,784	16,035	11,799	6,811	1,102	3,886	-
Home Garden CDP	Kings County	42.9	9,184	15,435	253	-	253	-	-
Calistoga city	Napa County	42.9	8,506	15,521	1,660	847	354	459	-
Guadalupe city	Santa Barbara County	42.9	8,751	15,766	839	96	577	166	-
Quincy CDP	Plumas County	42.9	8,742	15,758	2,703	1,996	707	-	-
Santa Margarita CDP	San Luis Obispo County	42.8	9,654	16,669	331	-	331	-	-
Winter Gardens CDP	San Diego County	42.8	10,459	16,711	2,829	644	1,749	436	-
Lake San Marcos CDP	San Diego County	42.8	10,189	16,440	1,101	420	555	126	-
Corona city	Riverside County	42.7	9,903	16,154	24,852	9,204	8,509	7,140	-
Upper Lake CDP	Lake County	42.7	9,672	16,687	1,077	187	890	-	-
Morgan Hill city	Santa Clara County	42.6	11,487	17,738	8,228	3,287	2,354	2,587	-
Fields Landing CDP	Humboldt County	42.6	8,752	15,767	177	-	177	-	-
Santa Venetia CDP	Marin County	42.6	10,710	16,961	2,333	1,219	984	130	-
Santee city	San Diego County	42.6	9,853	16,104	10,447	4,897	3,616	1,934	-
Armona CDP	Kings County	42.6	9,541	16,556	1,219	719	342	157	-
Mariposa CDP	Mariposa County	42.5	10,212	17,227	1,877	903	867	107	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
La Cañada Flintridge city	Los Angeles County	42.5	9,956	16,207	5,521	2,503	904	2,114	-
San Ramon city	Contra Costa County	42.5	11,087	17,338	11,671	2,011	6,730	2,833	97
Perris city	Riverside County	42.4	11,218	17,469	20,204	8,371	7,366	4,468	-
Anderson city	Shasta County	42.3	8,776	15,792	4,078	1,061	3,017	-	-
Linda CDP	Yuba County	42.3	11,387	17,785	5,494	2,033	2,213	1,248	-
North Tustin CDP	Orange County	42.2	9,639	15,890	4,155	1,991	1,068	1,096	-
Yosemite Valley CDP	Mariposa County	42.1	12,174	19,190	1,318	-	981	337	-
San Juan Capistrano city	Orange County	42.0	10,401	16,652	9,194	3,997	3,266	1,932	-
Toro Canyon CDP	Santa Barbara County	42.0	9,138	15,780	2,290	1,416	523	351	-
Sutter Creek city	Amador County	42.0	10,362	17,377	1,715	764	860	91	-
Amesti CDP	Santa Cruz County	42.0	9,948	16,231	1,882	658	1,213	11	-
Mount Shasta city	Siskiyou County	41.9	9,172	16,187	2,410	752	1,583	75	-
Ojai city	Ventura County	41.9	9,644	16,660	2,797	902	1,073	822	-
Mount Hermon CDP	Santa Cruz County	41.8	9,778	16,794	380	144	149	87	-
Camarillo city	Ventura County	41.8	9,237	15,489	12,475	3,198	6,561	2,716	-
Mountain Mesa CDP	Kern County	41.8	10,628	17,644	534	77	457	-	-
Buellton city	Santa Barbara County	41.8	9,122	16,137	1,013	138	755	120	-
Trinidad city	Humboldt County	41.7	9,785	16,800	310	9	302	-	-
Winters city	Yolo County	41.7	9,168	16,183	1,878	763	1,115	-	-
Rancho Santa Margarita city	Orange County	41.6	10,383	16,634	8,243	4,925	2,086	1,233	-
San Clemente city	Orange County	41.6	11,101	17,353	11,928	4,951	4,081	2,896	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Ben Lomond CDP	Santa Cruz County	41.5	9,935	16,950	5,350	1,937	1,880	1,534	-
Mendocino CDP	Mendocino County	41.5	9,325	16,340	1,445	157	1,287	-	-
East Richmond Heights CDP	Contra Costa County	41.5	10,295	16,546	371	12	338	21	-
Greenfield city	Monterey County	41.4	9,579	16,594	1,367	380	486	501	-
Chualar CDP	Monterey County	41.4	9,598	16,614	401	-	401	-	-
Boulder Creek CDP	Santa Cruz County	41.2	10,162	17,177	4,807	2,983	1,453	372	-
Mountain View Acres CDP	San Bernardino County	41.2	12,115	18,366	1,014	55	898	60	-
Keyes CDP	Stanislaus County	41.0	9,399	16,414	1,802	977	826	-	-
Bayview CDP	Humboldt County	41.0	7,293	13,544	468	-	464	5	-
American Canyon city	Napa County	41.0	10,238	16,492	3,779	728	2,534	518	-
Matheny CDP	Tulare County	40.9	10,065	17,081	277	-	275	2	-
Oak View CDP	Ventura County	40.9	10,183	17,198	1,256	187	1,068	-	-
Saratoga city	Santa Clara County	40.9	9,903	16,154	8,116	3,373	3,292	1,452	-
Sunnyside-Tahoe City CDP	Placer County	40.8	10,203	17,218	2,165	1,063	693	409	-
Jurupa Valley city	Riverside County	40.8	9,995	16,246	27,238	8,504	15,163	3,571	-
Muscoy CDP	San Bernardino County	40.8	10,144	16,396	2,031	356	1,538	137	-
Tahoe Vista CDP	Placer County	40.8	11,657	18,673	1,738	341	1,346	51	-
Franklin CDP	Merced County	40.8	9,911	16,237	1,292	108	1,184	-	-
Blythe city	Riverside County	40.6	9,960	16,975	16,501	9,621	5,941	939	-
Clearlake city	Lake County	40.5	9,957	16,973	6,483	2,600	3,350	532	-
Patterson city	Stanislaus County	40.4	9,869	16,885	3,696	772	2,473	452	-

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Coachella city	Riverside County	40.3	9,540	15,792	18,569	13,022	2,999	2,548	-
Big Bear Lake city	San Bernardino County	40.2	11,256	18,271	4,026	541	2,503	982	-
Richfield CDP	Tehama County	40.2	9,921	16,936	350	-	350	-	-
East Porterville CDP	Tulare County	40.2	10,689	17,050	1,935	321	1,547	67	-
Soledad city	Monterey County	40.2	9,412	16,427	2,815	942	1,251	622	-
Lenwood CDP	San Bernardino County	40.1	11,704	18,720	1,332	14	1,318	-	-
Lower Lake CDP	Lake County	40.1	10,215	17,230	1,707	1,061	645	1	-
Gridley city	Butte County	40.1	9,282	16,298	1,330	181	1,148	-	-
Bishop city	Inyo County	40.0	8,183	15,199	1,193	99	1,054	40	-
Clearlake Oaks CDP	Lake County	39.9	10,043	17,058	1,265	169	1,096	-	-
Newman city	Stanislaus County	39.9	9,890	16,906	1,307	211	998	98	-
Gold River CDP	Sacramento County	39.9	9,809	16,061	1,693	229	1,011	453	-
Penngrove CDP	Sonoma County	39.8	10,294	16,628	2,576	883	1,686	6	-
Delhi CDP	Merced County	39.8	9,768	16,784	2,247	576	1,670	-	-
Clayton city	Contra Costa County	39.7	11,444	17,695	2,453	747	1,387	319	-
Rancho Mirage city	Riverside County	39.7	10,357	16,608	16,458	9,483	3,054	3,920	-
French Camp CDP	San Joaquin County	39.7	11,544	17,872	2,009	1,195	814	-	-
Fort Irwin CDP	San Bernardino County	39.6	11,313	18,328	4,458	2,985	1,473	-	-
Indio city	Riverside County	39.6	9,661	15,912	20,224	10,936	4,575	4,713	-
Calabasas city	Los Angeles County	39.5	10,597	16,848	8,702	4,568	2,925	1,209	-
Oakdale city	Stanislaus County	39.4	9,247	16,262	3,957	1,118	1,941	899	-
Bonita CDP	San Diego County	39.4	10,234	16,485	3,209	1,330	1,241	639	-
Castaic CDP	Los Angeles County	39.3	10,733	17,536	4,648	3,413	1,066	168	-
Lemon Cove CDP	Tulare County	39.3	9,182	16,198	534	-	534	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Mentone CDP	San Bernardino County	39.2	9,989	16,240	3,894	1,749	1,629	517	-
Riverbank city	Stanislaus County	39.2	9,234	16,249	2,592	783	1,390	419	-
Terra Bella CDP	Tulare County	39.2	9,630	16,645	1,741	785	956	-	-
Parlier city	Fresno County	39.2	8,990	16,006	1,403	260	1,143	-	-
Pasatiempo CDP	Santa Cruz County	39.2	10,735	16,987	566	362	7	197	-
Dos Palos city	Merced County	39.1	9,937	16,953	863	241	623	-	-
Temecula city	Riverside County	39.1	11,091	17,342	23,736	10,643	7,647	5,446	-
Rodeo CDP	Contra Costa County	39.0	11,463	17,714	2,399	472	1,664	264	-
East Hemet CDP	Riverside County	38.9	11,268	17,519	3,336	1,524	1,335	478	-
Olivehurst CDP	Yuba County	38.9	11,692	18,020	4,774	2,688	2,087	-	-
Yreka city	Siskiyou County	38.9	9,148	16,163	6,394	3,656	2,109	629	-
Cutten CDP	Humboldt County	38.8	7,053	13,304	828	-	828	-	-
Highlands-Baywood Park CDP	San Mateo County	38.8	11,465	17,716	1,159	194	795	170	-
El Cerrito CDP	Riverside County	38.8	10,641	16,893	1,647	638	891	118	-
Redway CDP	Humboldt County	38.8	10,742	17,757	800	27	774	-	-
Val Verde CDP	Los Angeles County	38.7	10,731	17,746	1,642	1,168	474	-	-
Poway city	San Diego County	38.6	10,626	16,877	25,011	15,015	6,381	3,614	-
Sanger city	Fresno County	38.6	9,274	15,525	3,535	828	2,499	209	-
Rocklin city	Placer County	38.6	10,582	16,833	12,646	5,277	4,704	2,664	-
San Simeon CDP	San Luis Obispo County	38.5	10,351	17,367	510	383	127	-	-
Sunnyside CDP	Fresno County	38.5	9,697	15,948	1,225	507	389	330	-
San Andreas CDP	Calaveras County	38.4	10,471	17,486	5,362	4,269	995	98	-
Kerman city	Fresno County	38.4	8,551	15,567	2,069	564	1,056	449	-

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March ARB CDP	Riverside County	38.4	11,301	17,552	7,638	4,219	2,852	567	-
Stinson Beach CDP	Marin County	38.4	9,818	16,834	922	550	372	-	-
Lakeside CDP	San Diego County	38.4	10,912	17,163	4,434	2,119	1,523	792	-
San Miguel CDP	Contra Costa County	38.4	11,210	17,461	672	44	570	58	-
San Jacinto city	Riverside County	38.3	11,849	18,100	16,427	10,725	3,456	2,247	-
Danville town	Contra Costa County	38.3	11,120	17,371	11,565	6,560	3,656	1,348	-
Castle Hill CDP	Contra Costa County	38.3	11,226	17,477	466	181	267	17	-
Kenwood CDP	Sonoma County	38.3	9,911	16,926	3,304	2,651	653	-	-
Escalon city	San Joaquin County	38.1	9,431	16,447	1,473	402	1,071	-	-
Montecito CDP	Santa Barbara County	38.1	9,726	15,977	5,982	2,237	3,212	532	-
Biggs city	Butte County	38.1	10,092	17,107	407	27	380	-	-
Palm Desert city	Riverside County	38.0	9,564	15,815	17,158	7,336	5,898	3,924	-
South Oroville CDP	Butte County	38.0	9,418	15,712	1,705	65	1,641	-	-
Murrieta city	Riverside County	37.9	11,563	17,815	21,513	7,766	9,478	4,269	-
La Quinta city	Riverside County	37.9	10,437	16,688	22,513	17,165	3,200	2,148	-
Tuolumne City CDP	Tuolumne County	37.9	10,607	17,622	1,493	553	940	-	-
Fillmore city	Ventura County	37.8	9,576	16,592	2,153	873	998	282	-
Le Grand CDP	Merced County	37.8	10,044	17,060	730	-	730	-	-
Stratford CDP	Kings County	37.8	10,372	17,388	437	-	437	-	-
Eastvale city	Riverside County	37.8	10,816	17,067	7,567	3,654	3,294	619	-
Santa Paula city	Ventura County	37.8	9,945	16,196	2,899	499	1,864	535	-
Tahoma CDP	El Dorado County	37.7	11,517	18,533	819	472	347	-	-
El Centro city	Imperial County	37.7	8,054	14,305	7,182	1,399	5,278	505	-
Mira Monte CDP	Ventura County	37.7	10,342	17,357	2,925	1,599	1,326	-	-

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Camp Pendleton South CDP	San Diego County	37.5	13,689	19,940	2,507	1,574	919	14	-
Martell CDP	Amador County	37.5	10,466	17,481	1,460	28	1,431	-	-
Montara CDP	San Mateo County	37.5	10,333	17,348	2,482	1,798	684	-	-
Chino Hills city	San Bernardino County	37.5	11,199	17,451	28,593	22,220	3,746	2,627	-
Mecca CDP	Riverside County	37.3	10,346	17,362	4,454	2,377	2,077	-	-
Vandenberg Village CDP	Santa Barbara County	37.3	11,765	18,016	3,358	845	2,513	-	-
Point Reyes Station CDP	Marin County	37.3	10,278	17,293	2,314	1,941	373	-	-
East Quincy CDP	Plumas County	37.3	9,773	16,788	7,751	7,148	603	-	-
Banning city	Riverside County	37.3	11,984	18,235	14,847	9,799	3,924	1,124	-
Beaumont city	Riverside County	37.2	11,423	17,674	19,637	10,995	7,155	1,487	-
Selma city	Fresno County	37.2	9,025	16,041	3,291	851	2,067	374	-
Planada CDP	Merced County	37.2	10,752	17,767	1,009	117	892	-	-
San Ardo CDP	Monterey County	37.2	11,268	18,283	288	106	182	-	-
Lucas Valley-Marinwood CDP	Marin County	37.1	11,912	18,215	3,668	1,886	1,578	203	-
Madison CDP	Yolo County	37.1	10,840	17,855	990	167	822	-	-
Chowchilla city	Madera County	37.0	9,447	16,462	7,057	3,906	3,151	-	-
Portola city	Plumas County	36.9	10,758	17,773	3,460	2,273	1,188	-	-
Malibu city	Los Angeles County	36.9	12,390	18,641	12,702	6,773	4,635	1,294	-
Empire CDP	Stanislaus County	36.8	10,594	16,845	1,023	432	591	-	-
Kelseyville CDP	Lake County	36.8	9,823	16,838	1,846	1,076	770	-	-

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Wasco city	Kern County	36.7	9,498	16,514	6,008	2,818	2,973	217	-
Brookdale CDP	Santa Cruz County	36.7	10,631	17,647	2,462	1,275	1,183	4	-
Shasta Lake city	Shasta County	36.7	9,495	16,506	6,989	3,853	3,136	-	-
Ford City CDP	Kern County	36.7	10,443	17,458	982	579	403	-	-
Orangevale CDP	Sacramento County	36.7	10,617	16,868	7,327	2,885	3,971	471	-
Desert Hot Springs city	Riverside County	36.6	10,569	17,576	19,189	14,649	2,917	1,624	-
Huron city	Fresno County	36.6	10,754	17,770	1,018	471	547	-	-
Fallbrook CDP	San Diego County	36.5	11,436	17,762	11,200	7,453	2,671	1,076	-
Pixley CDP	Tulare County	36.5	10,422	17,437	1,993	1,136	858	-	-
Sultana CDP	Tulare County	36.4	10,581	17,597	284	23	261	-	-
Rio Linda CDP	Sacramento County	36.4	10,698	16,949	6,326	3,351	2,975	-	-
Gustine city	Merced County	36.4	10,042	17,058	993	500	493	-	-
Monte Rio CDP	Sonoma County	36.4	10,843	17,858	1,218	136	1,083	-	-
Lathrop city	San Joaquin County	36.3	10,028	17,041	13,247	9,130	3,978	138	-
Guerneville CDP	Sonoma County	36.2	10,389	17,404	6,214	3,842	2,372	-	-
Nice CDP	Lake County	36.2	10,540	17,555	1,104	154	949	-	-
Humboldt Hill CDP	Humboldt County	36.2	9,237	16,241	2,659	1,619	1,040	-	-
Warm Springs CDP	Riverside County	36.1	10,360	17,252	886	215	577	94	-
Camp Pendleton North CDP	San Diego County	36.0	14,703	20,986	5,664	1,465	4,199	-	-
Ladera CDP	San Mateo County	36.0	10,859	17,110	292	18	274	-	-
Fuller Acres CDP	Kern County	35.9	10,261	16,513	483	-	483	-	-
Arvin city	Kern County	35.9	9,487	16,503	3,084	1,754	1,330	-	-
Kingsburg city	Fresno County	35.9	9,356	16,371	2,239	502	1,350	387	-

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Oakley city	Contra Costa County	35.8	12,656	18,907	10,116	5,721	2,471	1,924	-
Weedpatch CDP	Kern County	35.7	10,323	17,338	2,276	1,538	739	-	-
Solvang city	Santa Barbara County	35.6	9,322	16,338	1,552	460	780	312	-
Norco city	Riverside County	35.6	10,661	16,912	8,919	4,174	2,694	2,051	-
Templeton CDP	San Luis Obispo County	35.6	9,597	16,612	5,113	3,122	1,241	751	-
Antelope CDP	Sacramento County	35.6	10,313	16,564	4,375	831	3,201	344	-
Linnell Camp CDP	Tulare County	35.5	10,193	17,209	75	-	75	-	-
East Foothills CDP	Santa Clara County	35.4	10,555	16,806	1,355	679	673	3	-
Lakeland Village CDP	Riverside County	35.4	12,301	18,553	5,615	3,553	2,062	-	-
Middletown CDP	Lake County	35.3	10,230	17,246	1,180	837	343	-	-
Victorville city	San Bernardino County	35.3	12,692	18,943	47,107	23,336	17,671	6,100	-
Lake Elsinore city	Riverside County	35.2	11,842	18,094	24,146	16,741	4,826	2,580	-
Coalinga city	Fresno County	35.2	9,838	16,853	4,246	2,123	2,123	-	-
Moraga town	Contra Costa County	35.1	11,164	17,415	5,890	3,092	1,951	846	-
Fulton CDP	Sonoma County	35.1	9,261	15,713	1,247	653	594	-	-
Gerber CDP	Tehama County	35.0	10,950	17,966	593	217	377	-	-
Orange Cove city	Fresno County	34.9	9,868	16,884	1,147	453	694	-	-
Fowler city	Fresno County	34.9	9,430	16,446	1,612	335	1,277	-	-
Kettleman City CDP	Kings County	34.9	11,217	18,233	135	-	135	-	-
Clovis city	Fresno County	34.9	9,494	15,745	15,638	6,537	6,529	2,572	-
Knights Landing CDP	Yolo County	34.9	10,197	17,212	321	-	321	-	-
Granite Hills CDP	San Diego County	34.9	11,167	17,418	1,790	726	910	155	-
Los Osos CDP	San Luis Obispo County	34.8	10,012	17,028	8,169	6,312	1,798	58	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Lagunitas-Forest Knolls CDP	Marin County	34.8	10,895	17,910	2,718	519	2,199	-	-
Heber CDP	Imperial County	34.7	8,596	15,611	949	355	594	-	-
Felton CDP	Santa Cruz County	34.7	10,365	17,380	2,913	1,227	1,353	334	-
Cameron Park CDP	El Dorado County	34.7	11,694	18,029	7,140	3,414	3,720	5	-
Bertsch-Oceanview CDP	Del Norte County	34.6	9,517	16,532	3,511	1,162	2,334	16	-
Yucaipa city	San Bernardino County	34.5	11,126	17,379	18,247	10,165	5,113	2,970	-
Delft Colony CDP	Tulare County	34.4	10,284	17,299	42	-	42	-	-
Jamestown CDP	Tuolumne County	34.4	10,878	17,894	1,917	341	1,577	-	-
Alamo CDP	Contra Costa County	34.4	11,743	17,994	6,190	3,310	2,389	492	-
Lucerne CDP	Lake County	34.4	10,699	17,715	3,186	2,349	836	-	-
Needles city	San Bernardino County	34.4	11,240	18,256	19,574	16,747	2,827	-	-
Columbia CDP	Tuolumne County	34.4	11,505	18,520	3,815	1,280	2,535	-	-
Angels city	Calaveras County	34.4	10,847	17,863	2,322	880	1,442	-	-
Los Molinos CDP	Tehama County	34.3	10,770	17,785	1,393	749	644	-	-
Willows city	Glenn County	34.3	9,021	16,037	1,813	745	1,069	-	-
Barstow city	San Bernardino County	34.3	14,472	20,733	26,580	19,750	5,163	1,667	-
Mendota city	Fresno County	34.2	10,160	17,176	2,109	1,105	1,004	-	-
San Juan Bautista city	San Benito County	34.2	10,196	17,211	455	37	418	-	-
Auburn city	Placer County	34.1	9,473	16,489	4,581	2,144	1,807	630	-
Grenada CDP	Siskiyou County	34.1	10,482	17,498	330	44	286	-	-
Waterford city	Stanislaus County	34.0	10,007	17,022	1,506	821	684	-	-
Scotia CDP	Humboldt County	34.0	10,344	17,359	477	278	200	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Green Acres CDP	Riverside County	34.0	11,446	18,461	896	179	717	-	-
Atascadero city	San Luis Obispo County	33.9	10,062	17,078	16,694	11,168	4,093	1,434	-
Camino CDP	El Dorado County	33.9	11,320	18,335	1,440	324	1,116	-	-
Avila Beach CDP	San Luis Obispo County	33.9	9,999	16,939	3,848	2,948	756	144	-
Desert Edge CDP	Riverside County	33.9	11,601	18,616	1,451	206	1,245	-	-
Rancho Santa Fe CDP	San Diego County	33.9	13,175	19,426	4,298	2,572	1,480	245	-
Cayucos CDP	San Luis Obispo County	33.8	10,546	17,561	1,984	1,238	746	-	-
Lafayette city	Contra Costa County	33.8	11,115	17,366	9,813	6,129	2,712	973	-
Caruthers CDP	Fresno County	33.8	9,865	16,881	1,294	847	447	-	-
Manteca city	San Joaquin County	33.7	11,007	17,258	12,883	5,836	5,932	1,116	-
Woodcrest CDP	Riverside County	33.7	11,346	17,667	7,286	4,543	2,410	334	-
Ione city	Amador County	33.6	10,851	17,867	3,028	1,570	1,458	-	-
Chester CDP	Plumas County	33.6	11,247	18,262	4,645	3,275	1,370	-	-
Shell Ridge CDP	Contra Costa County	33.5	11,327	17,579	275	155	-	120	-
Live Oak city	Sutter County	33.5	10,265	17,281	2,275	1,147	1,128	-	-
Lincoln city	Placer County	33.4	12,470	18,722	15,850	10,341	5,087	421	-
Ripon city	San Joaquin County	33.4	9,798	16,814	3,371	1,317	2,054	-	-
Monte Sereno city	Santa Clara County	33.4	10,896	17,147	1,033	678	206	150	-
Hughson city	Stanislaus County	33.3	9,546	16,538	1,162	286	875	-	-
Temelec CDP	Sonoma County	33.3	10,800	17,816	1,016	207	809	-	-
Davenport CDP	Santa Cruz County	33.3	10,474	17,489	1,814	1,520	294	-	-
Los Banos city	Merced County	33.3	12,111	18,362	6,396	2,743	3,076	576	-
Mather CDP	Sacramento County	33.3	10,597	16,874	6,416	5,387	425	604	-
Forestville CDP	Sonoma County	33.2	10,267	17,282	3,364	2,363	1,002	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Hidden Hills city	Los Angeles County	33.2	11,461	17,712	1,081	541	170	370	-
Bermuda Dunes CDP	Riverside County	33.1	9,478	15,730	1,891	384	1,123	384	-
Richgrove CDP	Tulare County	33.1	10,705	17,720	289	20	270	-	-
Deer Park CDP	Napa County	33.1	9,733	16,748	3,587	2,702	885	-	-
Winterhaven CDP	Imperial County	33.1	11,501	18,516	156	-	156	-	-
Menifee city	Riverside County	33.0	12,295	18,546	29,742	17,750	9,767	2,225	-
Colusa city	Colusa County	33.0	9,127	16,143	1,174	517	657	-	-
Dunsmuir city	Siskiyou County	33.0	11,000	18,016	952	269	682	-	-
Interlaken CDP	Santa Cruz County	33.0	10,546	16,963	6,275	4,996	1,279	1	-
Glen Ellen CDP	Sonoma County	32.9	10,368	17,384	1,344	1,202	142	-	-
Weed city	Siskiyou County	32.9	10,276	17,291	3,060	1,216	1,844	-	-
Corcoran city	Kings County	32.9	9,823	16,838	4,779	1,892	2,652	234	-
Mission Hills CDP	Santa Barbara County	32.9	12,208	18,459	770	321	449	-	-
Paradise town	Butte County	32.9	10,393	16,644	11,715	6,205	4,947	564	-
San Miguel CDP	San Luis Obispo County	32.9	10,983	17,998	1,075	768	307	-	-
Casa de Oro-Mount Helix CDP	San Diego County	32.8	10,995	17,247	4,384	2,482	1,318	584	-
Hillsborough town	San Mateo County	32.7	11,437	17,688	3,962	1,885	1,669	408	-
Garden Farms CDP	San Luis Obispo County	32.7	10,599	17,615	700	543	157	-	-
Las Lomas CDP	Monterey County	32.7	10,557	17,573	664	258	406	-	-
Mead Valley CDP	Riverside County	32.7	10,963	17,962	12,197	6,800	5,283	113	-
Hickman CDP	Stanislaus County	32.7	10,226	17,242	773	208	565	-	-
Firebaugh city	Fresno County	32.6	10,392	17,408	2,216	1,289	927	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Traver CDP	Tulare County	32.6	10,710	17,726	540	1	539	-	-
San Geronimo CDP	Marin County	32.5	11,175	18,190	965	821	144	-	-
Big Bear City CDP	San Bernardino County	32.5	11,941	18,956	20,447	15,508	4,939	-	-
Etna city	Siskiyou County	32.5	11,030	18,045	486	31	455	-	-
Myers Flat CDP	Humboldt County	32.4	11,100	18,115	277	-	277	-	-
Thousand Palms CDP	Riverside County	32.4	10,093	17,082	15,130	12,571	1,972	587	-
Calexico city	Imperial County	32.3	9,001	15,252	5,525	2,138	3,386	-	-
East Orosi CDP	Tulare County	32.3	10,894	17,909	159	-	159	-	-
Colfax city	Placer County	32.3	10,911	17,927	900	540	360	-	-
Loleta CDP	Humboldt County	32.2	10,578	17,594	1,359	780	579	-	-
Rio Dell city	Humboldt County	32.2	10,653	17,669	1,442	456	986	-	-
Homeland CDP	Riverside County	32.1	11,328	18,343	2,733	1,529	1,203	-	-
Ladera Ranch CDP	Orange County	32.1	11,065	17,316	3,102	1,619	1,482	1	-
Frazier Park CDP	Kern County	32.1	11,759	18,774	3,243	2,780	463	-	-
Westley CDP	Stanislaus County	32.0	11,814	18,830	43	-	43	-	-
Desert View Highlands CDP	Los Angeles County	32.0	11,261	17,512	282	-	282	-	-
Tahoma CDP	Placer County	31.9	12,345	19,361	841	589	252	-	-
Rolling Hills city	Los Angeles County	31.9	12,584	18,835	1,913	1,484	424	4	-
Laton CDP	Fresno County	31.9	10,738	17,754	1,241	701	540	-	-
Grangeville CDP	Kings County	31.9	10,319	17,334	409	-	409	-	-
Soda Springs CDP	Nevada County	31.7	12,000	19,015	216	58	158	-	-
Weaverville CDP	Trinity County	31.7	10,474	17,490	6,671	5,795	877	-	-
Penn Valley CDP	Nevada County	31.7	10,651	17,666	1,358	855	502	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Crescent Mills CDP	Plumas County	31.6	10,829	17,845	2,715	2,459	256	-	-
Brawley city	Imperial County	31.6	9,339	16,355	5,178	2,522	2,657	-	-
Grayson CDP	Stanislaus County	31.5	11,518	18,533	89	-	89	-	-
Pala CDP	San Diego County	31.5	11,159	18,175	1,609	376	1,232	1	-
Geyserville CDP	Sonoma County	31.5	10,516	17,531	2,889	2,328	561	-	-
Yorba Linda city	Orange County	31.5	11,308	17,560	12,493	6,689	4,894	910	-
Woodville CDP	Tulare County	31.4	11,005	18,020	2,785	2,703	82	-	-
Denair CDP	Stanislaus County	31.3	10,102	17,118	1,335	842	493	-	-
Montague city	Siskiyou County	31.3	11,042	18,057	1,138	449	689	-	-
Diamond Springs CDP	El Dorado County	31.3	10,720	17,696	10,650	5,049	4,701	899	-
Dixon city	Solano County	31.3	9,847	16,862	4,508	1,680	2,828	-	-
Bear Creek CDP	Merced County	31.2	11,219	18,234	37	-	37	-	-
Patterson Tract CDP	Tulare County	31.2	10,581	17,597	926	258	667	-	-
Princeton CDP	Colusa County	31.2	9,712	16,728	1,175	981	194	-	-
Esparto CDP	Yolo County	31.1	10,820	17,836	2,945	2,595	350	-	-
Villa Park city	Orange County	31.1	10,839	17,090	1,335	702	559	73	-
Occidental CDP	Sonoma County	31.1	11,027	18,042	3,178	2,645	534	-	-
South Taft CDP	Kern County	31.0	10,580	17,595	689	429	260	-	-
Rancho San Diego CDP	San Diego County	30.9	11,623	17,875	5,566	3,084	1,446	1,035	-
East Tulare Villa CDP	Tulare County	30.9	10,566	17,582	308	151	158	-	-
London CDP	Tulare County	30.7	11,108	18,124	403	73	329	-	-
Portola Valley town	San Mateo County	30.6	11,160	17,412	5,823	4,094	1,728	-	-
Hesperia city	San Bernardino County	30.6	12,604	18,860	46,638	28,584	15,380	2,674	-
Oakville CDP	Napa County	30.6	10,876	17,892	870	469	401	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Fish Camp CDP	Mariposa County	30.6	11,329	18,344	579	359	220	-	-
Canyon Lake city	Riverside County	30.6	12,375	18,626	2,504	1,964	540	-	-
McKinleyville CDP	Humboldt County	30.5	10,061	17,077	13,332	10,189	3,026	117	-
San Martin CDP	Santa Clara County	30.3	12,898	19,318	7,421	5,239	1,892	290	-
Cambria CDP	San Luis Obispo County	30.2	10,997	18,012	5,445	2,924	2,521	-	-
Garberville CDP	Humboldt County	30.1	10,458	17,473	1,715	1,084	631	-	-
Elverta CDP	Sacramento County	30.1	11,615	17,867	5,659	3,783	1,876	-	-
Rio Vista city	Solano County	29.9	10,989	18,004	4,323	2,191	2,132	-	-
Running Springs CDP	San Bernardino County	29.9	11,910	18,925	2,691	1,204	1,486	-	-
Valle Vista CDP	Riverside County	29.8	12,545	18,797	4,397	2,860	1,537	-	-
Winchester CDP	Riverside County	29.8	11,773	18,775	5,036	4,454	582	-	-
Oakhurst CDP	Madera County	29.8	10,813	17,828	3,838	2,859	978	-	-
Truckee town	Nevada County	29.7	10,458	17,473	20,693	15,304	3,837	1,552	-
Alturas city	Modoc County	29.7	9,697	16,712	1,577	905	672	-	-
Bradbury city	Los Angeles County	29.7	12,032	18,283	1,253	754	368	131	-
Pollock Pines CDP	El Dorado County	29.6	11,534	18,549	5,074	3,532	1,542	-	-
Kernville CDP	Kern County	29.6	12,186	19,201	7,915	6,422	1,493	-	-
Teviston CDP	Tulare County	29.5	11,476	18,491	1,389	661	728	-	-
Riverdale CDP	Fresno County	29.5	10,513	17,529	2,512	2,240	272	-	-
Plainview CDP	Tulare County	29.4	11,225	18,240	198	-	198	-	-
Twentynine Palms city	San Bernardino County	29.4	12,502	19,517	37,319	28,531	8,617	171	-
Mesa Verde CDP	Riverside County	29.2	12,443	19,458	2,753	2,576	176	-	-
Unincorporated Orange County	Orange County	29.2	11,047	17,395	160,200	151,444	6,188	2,489	79

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						Less than 25	25 - 50	50 - 75	75 and Greater
Lost Hills CDP	Kern County	29.2	11,322	18,337	3,553	3,247	306	-	-
Redwood Valley CDP	Mendocino County	29.2	10,430	17,445	1,751	884	867	-	-
Lancaster city	Los Angeles County	29.1	12,102	18,353	60,345	44,911	13,499	1,935	-
Fort Jones city	Siskiyou County	29.1	11,051	18,066	385	138	248	-	-
Thermal CDP	Riverside County	29.0	10,752	17,767	6,015	4,287	786	942	-
McCloud CDP	Siskiyou County	29.0	11,920	18,936	1,550	728	822	-	-
Seville CDP	Tulare County	29.0	11,382	18,397	407	92	315	-	-
Orinda city	Contra Costa County	29.0	11,676	17,927	8,201	3,980	3,790	431	-
Del Monte Forest CDP	Monterey County	28.9	11,203	17,454	5,142	3,355	1,275	512	-
Woodside town	San Mateo County	28.9	11,199	17,459	7,508	4,167	3,286	55	-
Greenville CDP	Plumas County	28.8	11,423	18,438	5,115	4,902	213	-	-
Channel Islands Beach CDP	Ventura County	28.8	12,002	18,253	259	19	239	-	-
Blairsden CDP	Plumas County	28.8	12,063	19,078	347	-	347	-	-
Plymouth city	Amador County	28.8	11,123	18,139	624	131	493	-	-
Tranquillity CDP	Fresno County	28.7	10,278	17,294	395	8	387	-	-
Bowles CDP	Fresno County	28.7	9,713	16,728	244	-	244	-	-
Mokelumne Hill CDP	Calaveras County	28.7	11,567	18,583	1,970	1,747	224	-	-
Proberta CDP	Tehama County	28.6	11,524	18,539	916	744	173	-	-
Edmundson Acres CDP	Kern County	28.5	9,913	16,928	43	-	43	-	-
Vineyard CDP	Sacramento County	28.5	11,507	17,772	11,010	9,225	1,627	158	-
Orland city	Glenn County	28.4	9,960	16,976	1,898	931	967	-	-
Sleepy Hollow CDP	Marin County	28.4	12,609	18,908	1,912	1,022	890	-	-
Yettem CDP	Tulare County	28.4	11,219	18,234	98	-	98	-	-

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Apple Valley town	San Bernardino County	28.4	13,242	19,495	47,346	26,144	18,941	2,262	-
Santa Ynez CDP	Santa Barbara County	28.4	10,001	17,017	3,287	1,892	1,395	-	-
Redcrest CDP	Humboldt County	28.3	12,103	19,118	383	126	257	-	-
North Lakeport CDP	Lake County	28.3	10,719	17,735	2,461	1,016	1,444	-	-
Lake Isabella CDP	Kern County	28.2	11,746	18,762	13,897	12,025	1,851	20	-
Emerald Lake Hills CDP	San Mateo County	28.2	11,430	17,681	765	563	202	-	-
El Portal CDP	Mariposa County	28.2	12,991	20,006	658	106	551	-	-
Tehachapi city	Kern County	28.1	10,651	17,667	6,320	3,599	2,722	-	-
Crestline CDP	San Bernardino County	28.1	11,456	18,471	8,851	6,646	2,205	-	-
Fort Washington CDP	Fresno County	28.1	10,577	16,828	79	35	44	-	-
Holtville city	Imperial County	28.1	9,892	16,908	735	108	627	-	-
Crows Landing CDP	Stanislaus County	28.0	11,650	18,666	2,032	1,922	110	-	-
Wofford Heights CDP	Kern County	28.0	12,533	19,549	3,916	2,928	988	-	-
Woodacre CDP	Marin County	27.9	13,114	19,492	1,150	981	169	-	-
Calpella CDP	Mendocino County	27.8	10,736	17,752	1,624	1,120	504	-	-
Mono Vista CDP	Tuolumne County	27.7	11,471	18,486	1,815	1,157	658	-	-
Point Arena city	Mendocino County	27.7	10,598	17,614	873	384	490	-	-
Nipomo CDP	San Luis Obispo County	27.7	10,544	17,559	9,506	7,556	1,949	-	-
Carmel Valley Village CDP	Monterey County	27.6	10,977	17,993	12,149	11,012	1,137	-	-
Hiouchi CDP	Del Norte County	27.6	12,119	19,134	371	-	371	-	-
Good Hope CDP	Riverside County	27.6	11,612	18,618	7,188	3,527	3,662	-	-
Galt city	Sacramento County	27.5	10,196	17,212	4,293	2,155	2,138	-	-
Ramona CDP	San Diego County	27.4	10,894	17,900	24,598	20,453	4,013	133	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Weott CDP	Humboldt County	27.3	11,839	18,855	481	32	449	-	-
Hilmar-Irwin CDP	Merced County	27.3	10,049	17,064	2,513	1,389	1,124	-	-
Imperial city	Imperial County	27.2	9,857	16,872	3,902	2,640	1,262	-	-
Shingle Springs CDP	El Dorado County	27.2	12,486	18,890	5,247	3,757	1,490	-	-
Bass Lake CDP	Madera County	27.2	11,653	18,669	1,205	676	528	-	-
Amador City city	Amador County	27.2	11,793	18,808	203	-	203	-	-
Easton CDP	Fresno County	27.2	11,307	17,706	1,927	1,525	403	-	-
Aptos Hills-Larkin Valley CDP	Santa Cruz County	27.2	11,101	17,915	5,917	4,221	1,682	13	-
Poplar-Cotton Center CDP	Tulare County	27.1	11,701	18,717	821	478	344	-	-
Loyola CDP	Santa Clara County	27.1	10,742	16,993	939	477	462	-	-
Los Alamos CDP	Santa Barbara County	27.1	11,570	18,585	2,475	2,341	134	-	-
Wildomar city	Riverside County	27.1	12,798	19,050	15,160	10,108	4,578	474	-
Phillipsville CDP	Humboldt County	27.1	11,300	18,316	457	266	191	-	-
Ripley CDP	Riverside County	27.1	11,810	18,826	1,088	638	450	-	-
Rutherford CDP	Napa County	27.1	10,955	17,970	1,075	191	884	-	-
Isleton city	Sacramento County	27.1	11,398	18,413	281	120	161	-	-
Silverado Resort CDP	Napa County	26.9	10,132	17,148	1,210	604	606	-	-
Manila CDP	Humboldt County	26.9	10,243	17,258	446	133	313	-	-
Alpine CDP	San Diego County	26.8	12,570	19,096	17,142	15,451	1,691	-	-
Westwood CDP	Lassen County	26.7	12,112	19,127	3,479	2,946	533	-	-
Yucca Valley town	San Bernardino County	26.6	11,938	18,953	25,387	20,420	4,551	416	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
French Valley CDP	Riverside County	26.6	13,083	19,334	6,959	5,274	1,685	-	-
Ridgecrest city	Kern County	26.5	11,974	18,226	13,445	10,468	2,977	1	-
Magalia CDP	Butte County	26.4	11,815	18,066	8,970	6,699	2,271	-	-
Lemoore Station CDP	Kings County	26.3	12,358	19,374	2,687	1,558	1,128	-	-
Cabazon CDP	Riverside County	26.2	11,820	18,836	3,115	1,108	1,630	377	-
Meiners Oaks CDP	Ventura County	25.9	10,533	17,548	901	522	379	-	-
Palo Verde CDP	Imperial County	25.9	11,150	18,165	378	26	352	-	-
Lake Arrowhead CDP	San Bernardino County	25.9	11,538	18,554	11,345	7,310	4,023	12	-
Los Altos Hills town	Santa Clara County	25.9	11,501	17,753	5,700	4,321	759	620	-
Independence CDP	Inyo County	25.9	12,240	19,255	3,115	2,788	326	-	-
Kelly Ridge CDP	Butte County	25.9	11,722	17,991	1,249	90	1,159	-	-
Richvale CDP	Butte County	25.8	10,554	17,570	593	492	101	-	-
Loomis town	Placer County	25.8	11,511	17,948	4,651	2,945	1,705	-	-
Valley Springs CDP	Calaveras County	25.8	11,721	18,736	6,318	5,257	1,061	-	-
Wrightwood CDP	San Bernardino County	25.8	11,521	18,537	3,793	3,073	719	-	-
Dos Palos Y CDP	Merced County	25.7	11,618	18,633	1,010	781	229	-	-
Los Olivos CDP	Santa Barbara County	25.7	10,537	17,552	1,574	1,067	506	-	-
Rough and Ready CDP	Nevada County	25.6	11,749	18,765	2,031	546	1,485	-	-
Calimesa city	Riverside County	25.6	11,336	18,352	9,502	7,540	1,569	393	-
Woodbridge CDP	San Joaquin County	25.6	11,150	17,414	1,928	1,823	105	-	-
Las Flores CDP	Orange County	25.5	11,907	18,158	1,337	1,088	249	-	-
El Dorado Hills CDP	El Dorado County	25.4	12,182	18,434	31,012	25,054	5,334	623	-
Del Rey CDP	Fresno County	25.4	10,363	17,378	779	594	184	-	-
Raisin City CDP	Fresno County	25.3	11,279	18,295	486	286	200	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Williams city	Colusa County	25.3	10,388	17,403	3,484	2,747	737	-	-
Blackhawk CDP	Contra Costa County	25.3	12,592	18,843	3,709	2,869	841	-	-
Tulelake city	Siskiyou County	25.1	11,425	18,441	262	137	125	-	-
San Lucas CDP	Monterey County	25.0	12,528	19,544	252	73	179	-	-
Mission Canyon CDP	Santa Barbara County	24.8	9,447	15,698	972	800	141	32	-
Quartz Hill CDP	Los Angeles County	24.7	12,609	18,860	2,408	1,083	1,325	-	-
Smith River CDP	Del Norte County	24.7	11,271	18,286	2,541	2,038	503	-	-
Little River CDP	Mendocino County	24.7	11,050	18,066	1,070	746	325	-	-
San Joaquin city	Fresno County	24.6	10,948	17,964	754	344	411	-	-
Rodriguez Camp CDP	Tulare County	24.6	10,385	17,400	169	169	-	-	-
Hardwick CDP	Kings County	24.3	11,647	18,663	89	69	20	-	-
Burney CDP	Shasta County	24.3	10,957	17,973	3,439	3,204	235	-	-
Corralitos CDP	Santa Cruz County	24.3	11,147	18,162	5,751	4,398	1,353	-	-
Arbuckle CDP	Colusa County	24.2	10,700	17,716	1,126	852	274	-	-
Morada CDP	San Joaquin County	24.2	11,047	17,308	1,908	1,465	443	-	-
Avenal city	Kings County	24.0	10,751	17,767	12,430	10,875	1,555	-	-
Shafter city	Kern County	23.9	10,333	17,349	24,444	21,483	2,671	290	-
Yolo CDP	Yolo County	23.9	11,967	18,982	883	701	182	-	-
Ferndale city	Humboldt County	23.8	10,707	17,722	657	457	200	-	-
Oak Park CDP	Ventura County	23.8	11,191	17,442	3,388	2,962	426	-	-
Buck Meadows CDP	Mariposa County	23.8	12,799	19,815	1,115	789	327	-	-
Taft city	Kern County	23.8	10,243	17,258	9,719	7,968	1,429	322	-
Wheatland city	Yuba County	23.7	11,414	18,429	5,051	4,388	663	-	-
Delleker CDP	Plumas County	23.6	11,932	18,947	1,770	1,456	315	-	-

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Soulsbyville CDP	Tuolumne County	23.6	11,365	18,381	1,926	1,297	629	-	-
Valley Acres CDP	Kern County	23.6	12,395	19,410	2,638	2,224	414	-	-
Parkwood CDP	Madera County	23.5	11,407	17,690	446	418	28	-	-
Taft Heights CDP	Kern County	23.5	11,343	18,358	194	174	20	-	-
Talmage CDP	Mendocino County	23.4	10,507	17,523	1,017	466	551	-	-
Clear Creek CDP	Lassen County	23.4	12,562	19,577	725	502	223	-	-
Palmdale city	Los Angeles County	23.3	12,733	18,985	67,894	55,574	12,199	121	-
Blue Lake city	Humboldt County	23.3	10,471	17,486	379	257	122	-	-
Cherry Valley CDP	Riverside County	23.3	11,662	18,627	5,080	3,716	1,330	35	-
North Shore CDP	Riverside County	23.2	11,936	18,951	7,154	5,341	1,813	-	-
Unincorporated San Mateo County	San Mateo County	23.1	11,805	18,405	177,957	169,550	5,304	3,103	-
Big Pine CDP	Inyo County	23.0	12,318	19,333	1,891	1,225	666	-	-
Calipatria city	Imperial County	23.0	11,329	18,344	2,209	1,409	801	-	-
Oroville East CDP	Butte County	22.9	11,376	17,776	13,868	11,277	2,590	1	-
Hamilton City CDP	Glenn County	22.9	10,997	18,012	200	200	-	-	-
Bonny Doon CDP	Santa Cruz County	22.6	11,872	18,887	10,681	6,586	4,094	-	-
Del Rio CDP	Stanislaus County	22.6	11,265	18,281	1,293	1,067	226	-	-
Littlerock CDP	Los Angeles County	22.6	11,786	18,787	1,180	917	263	-	-
Maxwell CDP	Colusa County	22.6	11,254	18,269	1,376	1,376	-	-	-
Spring Valley Lake CDP	San Bernardino County	22.6	13,068	19,319	1,979	1,811	72	96	-
Jamul CDP	San Diego County	22.5	12,607	18,935	10,773	8,891	1,731	151	-
Newcastle CDP	Placer County	22.5	12,245	18,748	1,531	1,229	301	-	-
Camino Tassajara CDP	Contra Costa County	22.3	13,111	19,362	808	802	6	-	-

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Pine Grove CDP	Amador County	22.3	12,270	19,285	4,458	3,101	1,357	-	-
Cottonwood CDP	Shasta County	22.2	10,898	17,913	1,486	1,402	84	-	-
Adelanto city	San Bernardino County	22.2	12,147	19,158	33,989	25,031	8,527	431	-
Fall River Mills CDP	Shasta County	22.2	11,740	18,755	1,659	1,566	93	-	-
Mi-Wuk Village CDP	Tuolumne County	22.2	12,652	19,668	1,778	1,446	333	-	-
Twain Harte CDP	Tuolumne County	22.2	12,252	19,268	2,367	1,920	447	-	-
Westmorland city	Imperial County	22.2	11,303	18,318	378	378	-	-	-
Freeport CDP	Sacramento County	22.2	13,063	19,314	32	32	-	-	-
Alta CDP	Placer County	22.2	12,068	19,084	1,525	1,136	389	-	-
Murphys CDP	Calaveras County	22.1	12,232	19,248	6,606	6,295	311	-	-
Rolling Hills CDP	Madera County	21.9	10,943	17,959	372	346	25	-	-
Inverness CDP	Marin County	21.8	11,775	18,791	4,096	3,701	394	-	-
Diablo CDP	Contra Costa County	21.8	12,862	19,113	869	869	-	-	-
Fairmead CDP	Madera County	21.8	12,460	19,476	5,013	4,367	646	-	-
Prunedale CDP	Monterey County	21.8	11,391	18,395	29,480	25,381	3,950	148	-
Granite Bay CDP	Placer County	21.8	12,308	18,559	13,773	10,843	2,775	155	-
Cedarville CDP	Modoc County	21.7	12,452	19,467	3,483	3,282	201	-	-
Discovery Bay CDP	Contra Costa County	21.7	11,590	18,606	2,211	1,399	811	-	-
Lake of the Pines CDP	Nevada County	21.5	11,387	18,402	957	684	273	-	-
Thermalito CDP	Butte County	21.5	11,778	18,386	8,149	6,009	2,130	11	-
Caspar CDP	Mendocino County	21.3	11,798	18,813	1,915	1,023	892	-	-
Julian CDP	San Diego County	21.3	11,996	19,012	5,058	3,631	1,426	-	-
Lee Vining CDP	Mono County	21.2	13,142	20,157	3,339	3,170	169	-	-
Temescal Valley CDP	Riverside County	21.1	11,423	18,397	12,379	10,618	1,762	-	-

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Riverdale Park CDP	Stanislaus County	21.1	12,467	18,718	930	917	13	-	-
Meadowbrook CDP	Riverside County	21.1	13,667	19,918	4,309	2,820	1,489	-	-
Springville CDP	Tulare County	21.1	12,205	19,220	2,677	2,235	442	-	-
La Vina CDP	Madera County	21.1	11,882	18,898	64	64	-	-	-
Topanga CDP	Los Angeles County	21.0	12,591	18,842	12,242	11,883	360	-	-
Philo CDP	Mendocino County	21.0	11,100	18,116	1,311	1,215	95	-	-
Linden CDP	San Joaquin County	21.0	11,065	18,080	4,742	4,735	7	-	-
Hidden Valley Lake CDP	Lake County	21.0	11,465	18,480	6,244	5,159	1,086	-	-
Dorris city	Siskiyou County	20.9	11,455	18,470	450	450	-	-	-
Santa Susana CDP	Ventura County	20.8	12,611	18,862	712	712	0	-	-
Fairbanks Ranch CDP	San Diego County	20.8	12,502	18,753	3,260	3,092	169	-	-
Dunnigan CDP	Yolo County	20.6	12,318	19,333	3,349	3,110	238	-	-
Madera Acres CDP	Madera County	20.5	11,429	18,436	4,660	4,284	376	-	-
Buena Vista CDP	Amador County	20.5	12,522	19,538	1,038	892	146	-	-
Hopland CDP	Mendocino County	20.5	11,631	18,646	2,256	1,761	495	-	-
Canby CDP	Modoc County	20.5	12,532	19,548	1,452	1,165	287	-	-
Paradise Park CDP	Santa Cruz County	20.4	11,945	18,197	178	159	19	-	-
Hamilton Branch CDP	Plumas County	20.4	12,382	19,398	695	451	243	-	-
Desert Shores CDP	Imperial County	20.4	11,710	18,725	442	442	-	-	-
La Selva Beach CDP	Santa Cruz County	20.3	11,478	18,108	3,390	2,775	615	-	-
Volta CDP	Merced County	20.3	11,423	18,438	2,797	2,797	-	-	-
Angwin CDP	Napa County	20.3	11,330	18,345	3,091	3,091	-	-	-
Mountain House CDP	San Joaquin County	20.3	11,499	18,515	2,043	2,043	-	-	-

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Rosedale CDP	Kern County	20.3	11,058	17,309	19,251	17,197	1,806	247	-
Loyalton city	Sierra County	20.3	11,652	18,668	228	228	-	-	-
Wawona CDP	Mariposa County	20.3	13,387	20,403	4,061	3,801	260	-	-
Soda Bay CDP	Lake County	20.3	11,638	18,653	822	636	187	-	-
Lockeford CDP	San Joaquin County	20.2	11,321	18,337	5,338	4,946	392	-	-
Tehama city	Tehama County	20.2	12,943	19,959	508	446	63	-	-
Zayante CDP	Santa Cruz County	20.2	12,049	19,065	1,744	1,493	251	-	-
Unincorporated Marin County	Marin County	20.2	12,133	18,861	254,335	246,258	6,988	1,089	-
Clearlake Riviera CDP	Lake County	20.1	11,721	18,737	3,342	3,152	190	-	-
Eucalyptus Hills CDP	San Diego County	20.1	12,535	18,819	3,045	2,890	155	-	-
Silver Lakes CDP	San Bernardino County	20.1	12,495	19,510	3,310	2,650	660	-	-
Bodfish CDP	Kern County	20.0	12,612	19,628	5,108	4,783	325	-	-
El Sobrante CDP	Riverside County	19.9	12,513	18,765	4,651	4,554	96	1	-
El Rancho CDP	Tulare County	19.8	11,344	18,360	46	46	-	-	-
Sutter CDP	Sutter County	19.7	11,323	18,338	1,943	1,943	-	-	-
Clarksburg CDP	Yolo County	19.7	11,350	18,365	1,299	1,299	-	-	-
Biola CDP	Fresno County	19.7	11,418	18,434	340	340	-	-	-
Spreckels CDP	Monterey County	19.7	11,127	18,143	78	78	-	-	-
Unincorporated Napa County	Napa County	19.6	11,716	18,558	446,086	439,052	5,092	1,942	-
San Antonio Heights CDP	San Bernardino County	19.6	12,923	19,188	1,572	1,572	-	-	-
Santa Nella CDP	Merced County	19.6	11,578	18,593	2,919	2,906	12	-	-

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Gasquet CDP	Del Norte County	19.6	12,170	19,185	3,044	2,748	296	-	-
North Gate CDP	Contra Costa County	19.6	13,259	19,511	421	421	-	-	-
Miranda CDP	Humboldt County	19.6	12,653	19,668	972	636	335	-	-
Garnet CDP	Riverside County	19.5	12,042	19,058	5,202	4,715	459	28	-
Monmouth CDP	Fresno County	19.5	11,272	18,288	197	197	-	-	-
Desert Palms CDP	Riverside County	19.5	13,954	20,451	1,709	1,295	376	38	-
Penryn CDP	Placer County	19.5	13,025	19,388	1,174	1,174	-	-	-
Lone Pine CDP	Inyo County	19.5	12,292	19,308	12,182	11,544	638	-	-
Robbins CDP	Sutter County	19.5	11,539	18,555	1,660	1,548	112	-	-
Reliez Valley CDP	Contra Costa County	19.5	12,619	18,870	1,509	1,311	198	-	-
Onyx CDP	Kern County	19.3	13,562	20,578	7,329	7,088	241	-	-
Las Flores CDP	Tehama County	19.3	11,895	18,910	229	20	209	-	-
Los Ranchos CDP	San Luis Obispo County	19.3	11,349	18,365	1,811	1,811	-	-	-
Hornbrook CDP	Siskiyou County	19.3	13,122	20,137	746	720	25	-	-
Bolinas CDP	Marin County	19.2	11,847	18,863	3,729	3,180	549	-	-
Campo CDP	San Diego County	19.2	12,817	19,832	15,033	13,613	1,419	-	-
Rancho Murieta CDP	Sacramento County	19.1	11,830	18,846	7,608	7,090	517	-	-
Westhaven-Moonstone CDP	Humboldt County	19.0	12,225	19,240	5,180	4,748	432	-	-
Arnold CDP	Calaveras County	18.9	12,720	19,735	9,465	8,784	681	-	-
Coto de Caza CDP	Orange County	18.9	13,300	19,551	5,082	4,589	460	33	-
Baker CDP	San Bernardino County	18.8	12,195	19,211	1,720	1,720	-	-	-
Piru CDP	Ventura County	18.8	11,738	18,753	1,800	1,654	147	-	-
Lakeview CDP	Riverside County	18.8	11,617	18,632	2,086	2,086	-	-	-

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Maricopa city	Kern County	18.7	11,897	18,913	961	961	-	-	-
Unincorporated San Joaquin County	San Joaquin County	18.7	12,159	18,865	751,933	735,954	14,202	1,777	-
Parksdale CDP	Madera County	18.7	11,583	18,599	1,160	855	304	-	-
Anchor Bay CDP	Mendocino County	18.6	12,112	19,127	2,248	2,102	147	-	-
Dixon Lane-Meadow Creek CDP	Inyo County	18.6	11,557	18,573	2,150	2,121	29	-	-
Centerville CDP	Fresno County	18.6	11,552	18,567	5,193	5,064	129	-	-
Jacumba CDP	San Diego County	18.5	13,081	20,096	3,916	3,563	353	-	-
Macdoel CDP	Siskiyou County	18.5	11,892	18,907	95	95	-	-	-
Bonadelle Ranchos-Madera Ranchos CDP	Madera County	18.5	11,634	18,650	7,448	7,121	327	-	-
Pajaro Dunes CDP	Santa Cruz County	18.5	11,516	18,481	1,640	1,325	315	-	-
Ballard CDP	Santa Barbara County	18.4	11,699	18,714	755	755	-	-	-
La Habra Heights city	Los Angeles County	18.4	12,840	19,091	3,942	3,929	13	-	-
West Point CDP	Calaveras County	18.4	12,954	19,969	2,380	2,227	153	-	-
Bodega Bay CDP	Sonoma County	18.4	11,978	18,994	5,341	5,156	185	-	-
University of California-Merced CDP	Merced County	18.4	9,613	16,628	425	194	231	-	-
Lompico CDP	Santa Cruz County	18.3	12,082	19,098	2,159	1,551	608	-	-
Pescadero CDP	San Mateo County	18.3	11,881	18,896	2,576	2,431	146	-	-
Aromas CDP	Monterey County	18.3	11,605	18,621	1,326	1,272	54	-	-
Palo Cedro CDP	Shasta County	18.3	11,318	18,333	2,354	1,926	429	-	-
Cobb CDP	Lake County	18.2	12,728	19,744	3,187	2,795	392	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Pine Valley CDP	San Diego County	18.2	12,351	19,367	4,585	4,284	302	-	-
Byron CDP	Contra Costa County	18.1	11,877	18,893	4,159	3,439	721	-	-
Weldon CDP	Kern County	18.1	12,895	19,911	17,051	13,969	3,082	-	-
Buckhorn CDP	Amador County	18.1	12,771	19,786	3,757	3,077	680	-	-
Ridgemark CDP	San Benito County	18.1	11,738	18,754	1,645	1,645	-	-	-
Smith Corner CDP	Kern County	18.0	11,568	18,584	141	141	-	-	-
Walnut Grove CDP	Sacramento County	18.0	11,733	18,749	6,528	6,528	-	-	-
Bonsall CDP	San Diego County	18.0	12,135	18,974	8,577	7,600	978	-	-
Lebec CDP	Kern County	18.0	12,755	19,771	9,810	9,582	227	-	-
Lewiston CDP	Trinity County	17.9	12,975	19,991	12,811	12,442	369	-	-
Fairhaven CDP	Humboldt County	17.9	11,313	18,328	425	425	-	-	-
Bridgeport CDP	Mono County	17.9	12,985	20,000	13,914	13,833	81	-	-
McSwain CDP	Merced County	17.9	11,615	18,630	3,864	3,620	244	-	-
Port Costa CDP	Contra Costa County	17.8	12,913	19,164	101	101	-	-	-
Callender CDP	San Luis Obispo County	17.8	11,597	18,612	1,463	1,463	-	-	-
Mettler CDP	Kern County	17.8	12,087	19,103	149	149	-	-	-
Indianola CDP	Humboldt County	17.8	11,146	18,162	904	904	-	-	-
Unincorporated Stanislaus County	Stanislaus County	17.6	11,915	18,768	876,449	860,673	12,903	2,873	-
Unincorporated Sonoma County	Sonoma County	17.6	11,983	18,855	885,175	849,735	31,669	3,772	-
Round Mountain CDP	Shasta County	17.6	13,005	20,021	1,073	428	645	-	-
Day Valley CDP	Santa Cruz County	17.6	11,912	18,927	12,015	11,550	465	-	-
Bodega CDP	Sonoma County	17.6	12,626	19,641	1,857	1,767	90	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Boonville CDP	Mendocino County	17.5	12,167	19,182	3,547	2,784	763	-	-
Pine Hills CDP	Humboldt County	17.5	10,963	17,410	6,474	6,287	187	-	-
Acampo CDP	San Joaquin County	17.4	11,933	18,847	600	600	-	-	-
Adin CDP	Modoc County	17.4	12,960	19,976	2,200	2,200	-	-	-
Kirkwood CDP	Amador County	17.4	12,436	19,451	1,201	1,201	-	-	-
Creston CDP	San Luis Obispo County	17.4	11,678	18,694	361	361	-	-	-
Fort Dick CDP	Del Norte County	17.4	11,810	18,826	1,789	1,361	428	-	-
Albion CDP	Mendocino County	17.4	12,666	19,681	1,162	1,032	129	-	-
Searles Valley CDP	San Bernardino County	17.4	12,403	19,418	6,716	6,466	250	-	-
La Honda CDP	San Mateo County	17.3	11,734	18,749	2,722	2,677	45	-	-
Valley Center CDP	San Diego County	17.3	12,147	19,131	17,577	14,780	2,797	-	-
Ballico CDP	Merced County	17.2	11,838	18,854	1,934	1,934	-	-	-
Pine Mountain Club CDP	Kern County	17.2	13,108	20,123	10,786	10,489	297	-	-
Vandenberg AFB CDP	Santa Barbara County	17.2	12,348	19,359	14,102	13,111	991	-	-
Unincorporated Santa Clara County	Santa Clara County	17.2	12,662	19,245	582,963	572,710	7,970	2,273	10
Three Rivers CDP	Tulare County	17.2	12,669	19,684	28,469	27,660	809	-	-
Courtland CDP	Sacramento County	17.1	11,838	18,854	1,152	1,152	-	-	-
Samoa CDP	Humboldt County	17.0	11,469	18,484	535	535	-	-	-
Idyllwild-Pine Cove CDP	Riverside County	17.0	12,085	19,101	8,782	8,330	452	-	-
Lake Wildwood CDP	Nevada County	17.0	12,056	19,072	1,957	1,527	431	-	-
Herlong CDP	Lassen County	17.0	14,316	21,332	1,042	1,042	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Harbison Canyon CDP	San Diego County	16.9	13,312	19,652	6,446	6,001	445	-	-
Klamath CDP	Del Norte County	16.9	13,243	20,258	7,919	6,931	987	-	-
Santa Rosa Valley CDP	Ventura County	16.9	12,575	18,826	4,431	4,117	313	-	-
Black Point-Green Point CDP	Marin County	16.8	13,629	19,914	1,722	1,722	-	-	-
Phoenix Lake CDP	Tuolumne County	16.8	12,339	19,355	7,046	6,457	589	-	-
Oasis CDP	Riverside County	16.7	12,895	19,910	12,564	10,148	2,416	-	-
Woodlands CDP	San Luis Obispo County	16.7	11,894	18,909	1,052	1,052	-	-	-
Red Corral CDP	Amador County	16.7	12,879	19,894	3,740	2,960	781	-	-
Muir Beach CDP	Marin County	16.6	11,680	18,696	315	315	-	-	-
Monument Hills CDP	Yolo County	16.5	11,895	18,911	2,578	2,578	-	-	-
Sierra Village CDP	Tuolumne County	16.4	13,241	20,257	1,616	930	686	-	-
Lake Sherwood CDP	Ventura County	16.4	12,697	18,948	2,005	2,005	-	-	-
Crowley Lake CDP	Mono County	16.3	12,992	20,007	1,797	1,381	416	-	-
Durham CDP	Butte County	16.2	11,777	18,724	52,299	51,707	468	124	-
Happy Camp CDP	Siskiyou County	16.1	12,739	19,755	7,749	7,306	442	-	-
Benbow CDP	Humboldt County	16.1	12,688	19,703	3,124	2,684	439	-	-
Palermo CDP	Butte County	16.1	12,373	19,374	18,664	17,276	1,388	-	-
Edna CDP	San Luis Obispo County	16.0	11,776	18,791	780	780	-	-	-
Johnstonville CDP	Lassen County	15.9	11,974	18,989	5,348	5,152	196	-	-
Cherokee Strip CDP	Kern County	15.9	11,913	18,928	58	58	-	-	-
Rancho Calaveras CDP	Calaveras County	15.9	12,730	19,745	5,361	4,067	1,293	-	-
West Park CDP	Fresno County	15.9	12,520	18,851	1,147	1,147	-	-	-
Boron CDP	Kern County	15.8	12,653	19,668	8,832	8,091	741	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Joshua Tree CDP	San Bernardino County	15.8	13,060	20,075	23,727	22,197	1,530	-	-
Nuevo CDP	Riverside County	15.7	12,118	19,134	4,334	4,334	-	-	-
Norris Canyon CDP	Contra Costa County	15.7	13,609	19,861	2,264	2,156	108	-	-
Bombay Beach CDP	Imperial County	15.7	12,607	19,622	602	602	-	-	-
Foresthill CDP	Placer County	15.6	12,292	19,307	7,158	7,158	-	-	-
Drytown CDP	Amador County	15.6	13,442	20,457	2,360	2,360	-	-	-
Friant CDP	Fresno County	15.5	12,079	19,094	816	816	-	-	-
Blacklake CDP	San Luis Obispo County	15.5	12,024	19,040	669	669	-	-	-
Oak Hills CDP	San Bernardino County	15.5	12,658	19,661	15,583	12,610	2,973	-	-
College City CDP	Colusa County	15.5	12,096	19,112	2,098	2,098	-	-	-
San Diego Country Estates CDP	San Diego County	15.4	12,144	19,160	10,751	10,751	-	-	-
Cowan CDP	Stanislaus County	15.4	11,861	18,877	90	90	-	-	-
Willow Creek CDP	Humboldt County	15.4	12,859	19,874	19,398	18,295	1,103	-	-
Morongo Valley CDP	San Bernardino County	15.4	13,090	20,106	16,140	15,342	799	-	-
McKittrick CDP	Kern County	15.4	12,355	19,370	1,675	1,675	-	-	-
Hartley CDP	Solano County	15.3	12,529	19,376	4,144	4,097	47	-	-
Rainbow CDP	San Diego County	15.2	12,068	19,084	7,067	6,482	585	-	-
McArthur CDP	Shasta County	15.2	12,533	19,548	641	641	-	-	-
Meadow Vista CDP	Placer County	15.2	12,260	19,275	3,380	3,380	-	-	-
Vista Santa Rosa CDP	Riverside County	15.2	12,132	19,148	10,317	10,134	183	-	-
Keene CDP	Kern County	15.1	13,044	20,060	6,183	5,960	223	-	-
Jenner CDP	Sonoma County	15.1	12,425	19,440	1,350	1,193	157	-	-
Derby Acres CDP	Kern County	15.0	12,494	19,510	2,292	2,292	-	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Sisquoc CDP	Santa Barbara County	15.0	12,185	19,200	1,427	1,427	-	-	-
Newell CDP	Modoc County	15.0	12,932	19,948	1,540	1,540	-	-	-
Laytonville CDP	Mendocino County	15.0	12,848	19,863	3,435	3,035	400	-	-
Gazelle CDP	Siskiyou County	14.9	12,982	19,998	374	374	-	-	-
East Shore CDP	Plumas County	14.9	13,212	20,228	757	728	29	-	-
Hidden Meadows CDP	San Diego County	14.9	13,104	19,626	4,216	4,216	-	-	-
Unincorporated Sacramento County	Sacramento County	14.9	12,436	19,163	336,284	326,430	8,141	1,713	-
Lake of the Woods CDP	Kern County	14.8	13,154	20,170	2,254	2,254	-	-	-
Unincorporated Santa Cruz County	Santa Cruz County	14.8	12,493	19,402	185,337	178,603	6,160	574	-
Mexican Colony CDP	Kern County	14.8	12,089	19,104	20	20	-	-	-
Elkhorn CDP	Monterey County	14.7	12,246	19,261	3,074	3,056	18	-	-
Thornton CDP	San Joaquin County	14.7	12,339	19,355	1,362	1,362	-	-	-
Borrego Springs CDP	San Diego County	14.7	12,978	19,993	27,566	26,312	1,253	-	-
Midpines CDP	Mariposa County	14.7	13,040	20,055	15,697	14,004	1,692	-	-
Valley Home CDP	Stanislaus County	14.6	12,371	19,387	736	736	-	-	-
Doyle CDP	Lassen County	14.6	13,830	20,845	3,909	3,705	203	-	-
Snelling CDP	Merced County	14.6	12,341	19,357	346	346	-	-	-
Romoland CDP	Riverside County	14.6	12,437	19,452	1,692	1,652	40	-	-
Victor CDP	San Joaquin County	14.5	12,210	19,225	808	808	-	-	-
Meridian CDP	Sutter County	14.5	12,473	19,488	3,389	3,389	-	-	-
June Lake CDP	Mono County	14.5	12,710	19,725	5,112	4,952	160	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Tuttle CDP	Merced County	14.4	12,377	19,393	1,126	1,126	-	-	-
Lexington Hills CDP	Santa Clara County	14.4	13,666	19,962	3,020	3,020	-	-	-
Collierville CDP	San Joaquin County	14.4	12,212	19,228	4,221	4,221	-	-	-
Alta Sierra CDP	Nevada County	14.4	12,309	19,324	5,325	4,737	588	-	-
Rosamond CDP	Kern County	14.4	12,580	19,595	33,347	32,183	1,164	-	-
Covelo CDP	Mendocino County	14.4	12,404	19,419	4,541	4,541	-	-	-
Copperopolis CDP	Calaveras County	14.3	13,122	20,138	13,306	13,078	228	-	-
Descanso CDP	San Diego County	14.3	12,933	19,949	12,262	12,080	182	-	-
Lake Los Angeles CDP	Los Angeles County	14.2	12,648	19,663	6,234	6,234	-	-	-
Cleone CDP	Mendocino County	14.2	11,883	18,899	1,020	1,020	-	-	-
Edwards AFB CDP	Kern County	14.1	12,595	19,610	10,966	10,885	81	-	-
Manchester CDP	Mendocino County	14.1	12,985	20,001	1,676	1,577	99	-	-
Knightesen CDP	Contra Costa County	14.1	12,939	19,798	5,349	5,349	-	-	-
Aromas CDP	San Benito County	14.1	12,310	19,326	1,704	1,694	10	-	-
North San Juan CDP	Nevada County	14.0	12,648	19,664	1,551	1,551	-	-	-
Terminous CDP	San Joaquin County	14.0	12,318	19,333	626	626	-	-	-
Sun Village CDP	Los Angeles County	14.0	12,654	19,660	6,935	6,935	-	-	-
Inyokern CDP	Kern County	13.9	13,348	20,340	6,987	6,427	560	-	-
Peters CDP	San Joaquin County	13.9	12,246	19,261	1,618	1,618	-	-	-
Shandon CDP	San Luis Obispo County	13.9	12,500	19,516	1,888	1,888	-	-	-
Nicasio CDP	Marin County	13.9	12,404	19,420	835	835	-	-	-
Yosemite Lakes CDP	Madera County	13.8	12,786	19,801	13,377	12,694	683	-	-
Plumas Lake CDP	Yuba County	13.8	12,613	19,629	5,366	5,268	99	-	-
Tomales CDP	Marin County	13.8	12,448	19,463	212	212	-	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Lake Almanor Peninsula CDP	Plumas County	13.8	12,533	19,549	1,943	1,943	-	-	-
New Cuyama CDP	Santa Barbara County	13.8	12,765	19,780	452	452	-	-	-
Waukena CDP	Tulare County	13.8	12,269	19,285	603	603	-	-	-
Franklin CDP	Sacramento County	13.8	13,161	19,540	1,348	1,348	-	-	-
Bloomfield CDP	Sonoma County	13.7	12,262	19,277	5,207	5,207	-	-	-
Boulevard CDP	San Diego County	13.7	13,539	20,555	2,500	2,298	201	-	-
Crest CDP	San Diego County	13.7	13,589	19,840	4,179	4,179	-	-	-
Unincorporated Los Angeles County	Los Angeles County	13.6	13,193	19,935	1,496,490	1,471,787	15,370	8,914	419
Golden Hills CDP	Kern County	13.4	12,622	19,638	7,842	7,580	263	-	-
Groveland CDP	Tuolumne County	13.4	13,259	20,274	6,114	5,880	234	-	-
Buttonwillow CDP	Kern County	13.4	12,458	19,474	4,433	4,433	-	-	-
Downieville CDP	Sierra County	13.3	12,838	19,854	2,036	2,036	-	-	-
Bell Canyon CDP	Ventura County	13.3	13,550	19,801	2,327	2,327	-	-	-
Almanor CDP	Plumas County	13.3	12,961	19,976	565	565	-	-	-
Timber Cove CDP	Sonoma County	13.2	13,333	20,349	3,617	3,617	-	-	-
East Nicolaus CDP	Sutter County	13.2	12,504	19,520	2,934	2,934	-	-	-
Waterloo CDP	San Joaquin County	13.2	12,207	19,223	3,478	3,478	-	-	-
Potter Valley CDP	Mendocino County	13.2	12,372	19,388	2,579	2,579	-	-	-
Niland CDP	Imperial County	13.2	13,015	20,030	257	257	-	-	-
Coloma CDP	El Dorado County	13.2	12,615	19,630	2,147	2,147	-	-	-
Westside CDP	Fresno County	13.2	13,347	20,363	679	679	-	-	-
El Nido CDP	Merced County	13.1	12,956	19,971	2,107	2,056	51	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Sunny Slopes CDP	Mono County	13.1	12,859	19,874	1,206	1,161	45	-	-
Patton Village CDP	Lassen County	13.1	14,149	21,164	2,126	1,976	149	-	-
Alhambra Valley CDP	Contra Costa County	13.0	13,721	19,972	767	737	30	-	-
Mountain Gate CDP	Shasta County	13.0	12,283	19,298	1,264	1,264	-	-	-
Nord CDP	Butte County	13.0	12,395	19,411	1,347	1,347	-	-	-
Monterey Park Tract CDP	Stanislaus County	12.9	12,505	19,521	30	30	-	-	-
Mojave CDP	Kern County	12.9	13,022	20,038	37,309	35,423	1,840	46	-
Janesville CDP	Lassen County	12.9	13,470	20,486	8,440	8,237	203	-	-
Hasley Canyon CDP	Los Angeles County	12.9	12,733	19,749	3,673	3,651	23	-	-
Salton Sea Beach CDP	Imperial County	12.9	12,944	19,960	193	193	-	-	-
Spaulding CDP	Lassen County	12.9	13,737	20,752	2,131	2,131	-	-	-
Unincorporated Ventura County	Ventura County	12.7	12,901	19,671	1,032,335	1,012,462	18,630	1,243	-
Hayfork CDP	Trinity County	12.7	13,461	20,477	46,144	45,493	651	-	-
Honcut CDP	Butte County	12.7	12,739	19,754	2,711	2,711	-	-	-
Agua Dulce CDP	Los Angeles County	12.7	12,686	19,699	14,631	14,631	-	-	-
Acton CDP	Los Angeles County	12.7	12,771	19,779	25,126	25,001	124	-	-
Unincorporated San Diego County	San Diego County	12.6	13,138	19,892	2,020,647	1,982,690	34,819	3,138	-
Camanche North Shore CDP	Amador County	12.6	12,825	19,840	1,492	1,492	-	-	-
Unincorporated Alameda County	Alameda County	12.6	13,103	19,752	234,653	232,091	2,029	534	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Wilkerson CDP	Inyo County	12.6	13,344	20,359	3,665	3,546	119	-	-
Lanare CDP	Fresno County	12.6	12,756	19,772	1,292	1,292	-	-	-
Sunol CDP	Alameda County	12.5	12,640	19,509	17,907	17,907	-	-	-
Georgetown CDP	El Dorado County	12.5	12,756	19,772	9,682	9,682	-	-	-
Kingvale CDP	Placer County	12.5	12,858	19,873	56	56	-	-	-
Trinity Village CDP	Trinity County	12.5	13,777	20,793	2,569	2,569	-	-	-
Avery CDP	Calaveras County	12.5	13,578	20,593	2,880	2,610	271	-	-
East Oakdale CDP	Stanislaus County	12.4	12,567	19,583	3,222	3,222	-	-	-
Allendale CDP	Solano County	12.4	12,684	19,700	3,927	3,927	-	-	-
Los Berros CDP	San Luis Obispo County	12.4	12,427	19,442	1,608	1,608	-	-	-
Dutch Flat CDP	Placer County	12.4	12,994	20,009	379	379	-	-	-
Likely CDP	Modoc County	12.4	13,358	20,374	851	851	-	-	-
Cold Springs CDP	El Dorado County	12.3	12,653	19,668	483	483	-	-	-
Camptonville CDP	Yuba County	12.2	13,081	20,096	546	546	-	-	-
Big Creek CDP	Fresno County	12.1	12,964	19,979	294	294	-	-	-
Sierraville CDP	Sierra County	12.1	12,812	19,828	3,213	3,213	-	-	-
Cressey CDP	Merced County	12.1	12,811	19,827	1,125	1,125	-	-	-
Unincorporated Santa Barbara County	Santa Barbara County	12.1	12,377	19,229	1,657,666	1,644,961	8,427	4,278	-
Kingvale CDP	Nevada County	12.0	13,082	20,098	559	559	-	-	-
Unincorporated Del Norte County	Del Norte County	12.0	11,921	18,936	623,554	619,244	3,737	573	-
Taylorsville CDP	Plumas County	11.9	13,258	20,273	2,078	2,078	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Unincorporated Contra Costa County	Contra Costa County	11.9	13,161	19,704	231,905	223,742	6,793	1,369	-
Pioneer CDP	Amador County	11.9	13,649	20,665	2,755	2,341	414	-	-
Seeley CDP	Imperial County	11.8	12,934	19,950	848	848	-	-	-
Dogtown CDP	San Joaquin County	11.8	12,714	19,729	8,299	8,299	-	-	-
Shasta CDP	Shasta County	11.8	12,602	19,609	7,023	6,451	572	-	-
Lake Nacimiento CDP	San Luis Obispo County	11.7	12,830	19,845	6,572	6,572	-	-	-
Green Valley CDP	Solano County	11.7	13,961	20,212	5,385	5,385	-	-	-
Shelter Cove CDP	Humboldt County	11.6	13,076	20,092	3,731	3,731	-	-	-
Shaver Lake CDP	Fresno County	11.6	12,929	19,944	20,613	20,613	-	-	-
West Bishop CDP	Inyo County	11.5	12,653	19,669	5,605	5,574	31	-	-
Wilton CDP	Sacramento County	11.5	12,721	19,737	18,562	18,562	-	-	-
Lake Mathews CDP	Riverside County	11.5	13,058	19,933	10,194	10,101	92	-	-
Loma Rica CDP	Yuba County	11.5	12,999	20,015	11,830	11,671	160	-	-
Butte Valley CDP	Butte County	11.5	12,486	19,501	11,706	11,310	395	-	-
Orick CDP	Humboldt County	11.4	13,301	20,317	3,037	2,462	575	-	-
Tooleville CDP	Tulare County	11.4	12,661	19,677	43	43	-	-	-
Long Barn CDP	Tuolumne County	11.3	13,092	20,108	1,841	1,841	-	-	-
Fieldbrook CDP	Humboldt County	11.3	12,639	19,654	6,699	6,699	-	-	-
Alpine Village CDP	Alpine County	11.3	13,442	20,458	1,795	1,795	-	-	-
Pine Mountain Lake CDP	Tuolumne County	11.2	13,339	20,354	12,142	11,968	174	-	-
Vallecito CDP	Calaveras County	11.2	13,165	20,180	5,479	5,479	-	-	-
Hydesville CDP	Humboldt County	11.2	12,674	19,690	4,800	4,800	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Farmington CDP	San Joaquin County	11.2	12,824	19,840	1,627	1,627	-	-	-
Coarsegold CDP	Madera County	11.1	13,025	20,040	7,032	7,032	-	-	-
Kirkwood CDP	Alpine County	11.1	13,173	20,188	1,588	1,588	-	-	-
Big Lagoon CDP	Humboldt County	11.1	12,852	19,867	384	384	-	-	-
Fellows CDP	Kern County	11.1	13,081	20,096	420	420	-	-	-
Loma Mar CDP	San Mateo County	11.0	12,838	19,854	1,109	1,109	-	-	-
Oak Glen CDP	San Bernardino County	11.0	12,951	19,932	9,491	9,491	-	-	-
Montgomery Creek CDP	Shasta County	11.0	13,739	20,755	2,082	2,082	-	-	-
Hoopa CDP	Humboldt County	11.0	12,893	19,909	10,068	10,068	-	-	-
Elk Creek CDP	Glenn County	11.0	13,189	20,204	928	928	-	-	-
Vina CDP	Tehama County	11.0	13,043	20,058	865	865	-	-	-
Lindcove CDP	Tulare County	10.9	12,838	19,854	437	437	-	-	-
Tres Pinos CDP	San Benito County	10.9	12,852	19,867	2,302	2,302	-	-	-
Minkler CDP	Fresno County	10.9	12,818	19,834	3,730	3,730	-	-	-
South Dos Palos CDP	Merced County	10.9	12,905	19,920	982	982	-	-	-
Brooktrails CDP	Mendocino County	10.9	12,849	19,864	4,654	4,654	-	-	-
Unincorporated Placer County	Placer County	10.9	12,973	19,916	776,398	763,851	11,163	1,384	-
Stevinson CDP	Merced County	10.9	12,937	19,952	723	723	-	-	-
Phelan CDP	San Bernardino County	10.9	13,324	20,340	38,462	33,913	4,509	40	-
Bootjack CDP	Mariposa County	10.9	13,225	20,241	4,480	4,480	-	-	-
Guinda CDP	Yolo County	10.9	13,009	20,024	1,860	1,860	-	-	-
Walker CDP	Mono County	10.8	13,986	21,002	11,801	11,801	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Unincorporated Tulare County	Tulare County	10.8	12,841	19,812	2,959,022	2,927,765	30,974	284	-
Carrick CDP	Siskiyou County	10.8	13,126	20,141	38	38	-	-	-
West Goshen CDP	Tulare County	10.8	12,757	19,773	754	754	-	-	-
Sea Ranch CDP	Sonoma County	10.7	13,560	20,576	10,328	9,570	759	-	-
Moskowite Corner CDP	Napa County	10.7	12,869	19,884	1,799	1,799	-	-	-
Oak Shores CDP	San Luis Obispo County	10.7	13,062	20,077	3,242	3,242	-	-	-
Monson CDP	Tulare County	10.7	12,845	19,860	320	320	-	-	-
Lake Hughes CDP	Los Angeles County	10.6	13,143	20,159	6,799	6,799	-	-	-
Squirrel Mountain Valley CDP	Kern County	10.6	13,517	20,533	457	426	31	-	-
Volcano CDP	Amador County	10.6	13,383	20,398	960	960	-	-	-
Dillon Beach CDP	Marin County	10.6	13,083	20,099	1,910	1,910	-	-	-
Burnt Ranch CDP	Trinity County	10.5	13,782	20,797	8,563	8,263	301	-	-
Prattville CDP	Plumas County	10.5	12,784	19,800	386	386	-	-	-
Green Valley CDP	Los Angeles County	10.5	13,098	20,114	8,198	8,198	-	-	-
Herald CDP	Sacramento County	10.5	12,970	19,985	5,042	5,042	-	-	-
Ahwahnee CDP	Madera County	10.4	13,113	20,129	6,415	6,415	-	-	-
Potrero CDP	San Diego County	10.4	13,356	20,371	2,016	1,284	732	-	-
Auberry CDP	Fresno County	10.4	13,044	20,060	12,253	12,253	-	-	-
Diablo Grande CDP	Stanislaus County	10.3	13,129	20,144	3,266	3,266	-	-	-
Unincorporated Yolo County	Yolo County	10.3	13,133	20,051	602,516	594,613	7,542	361	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Lake California CDP	Tehama County	10.3	13,058	20,073	4,029	4,029	-	-	-
Lakehead CDP	Shasta County	10.3	13,146	20,162	3,005	3,005	-	-	-
Unincorporated Merced County	Merced County	10.2	12,921	19,903	1,180,128	1,169,427	9,980	721	-
Pierpoint CDP	Tulare County	10.2	13,200	20,215	261	261	-	-	-
Tupman CDP	Kern County	10.2	13,501	20,517	338	338	-	-	-
Unincorporated Solano County	Solano County	10.2	13,305	20,099	428,169	421,901	5,433	835	-
Valley Ranch CDP	Plumas County	10.1	13,552	20,568	728	728	-	-	-
Bella Vista CDP	Shasta County	10.1	12,751	19,767	14,208	13,970	238	-	-
Salmon Creek CDP	Sonoma County	10.0	13,019	20,035	713	713	-	-	-
Keeler CDP	Inyo County	10.0	13,400	20,416	833	833	-	-	-
Nicolaus CDP	Sutter County	10.0	13,010	20,025	2,008	2,008	-	-	-
Challenge-Brownsville CDP	Yuba County	10.0	13,577	20,592	6,211	6,211	-	-	-
Carmet CDP	Sonoma County	10.0	13,011	20,026	183	183	-	-	-
Whitley Gardens CDP	San Luis Obispo County	10.0	13,048	20,063	874	874	-	-	-
Homestead Valley CDP	San Bernardino County	9.9	13,843	20,858	21,684	20,312	1,372	-	-
Garey CDP	Santa Barbara County	9.9	12,890	19,906	809	809	-	-	-
Cedar Ridge CDP	Tuolumne County	9.9	13,293	20,309	4,985	4,985	-	-	-
Auburn Lake Trails CDP	El Dorado County	9.9	13,121	20,137	8,146	8,146	-	-	-
Whitehawk CDP	Plumas County	9.8	13,507	20,523	1,654	1,654	-	-	-
Nubieber CDP	Lassen County	9.8	13,509	20,524	479	479	-	-	-
Edgewood CDP	Siskiyou County	9.7	12,987	20,003	650	650	-	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Bend CDP	Tehama County	9.7	13,061	20,077	1,870	1,870	-	-	-
Bethel Island CDP	Contra Costa County	9.7	15,804	22,055	3,299	3,299	-	-	-
Graeagle CDP	Plumas County	9.7	13,988	21,004	7,084	6,883	201	-	-
Rio Oso CDP	Sutter County	9.6	13,124	20,140	4,179	4,179	-	-	-
Aguanga CDP	Riverside County	9.6	13,350	20,366	8,704	8,704	-	-	-
Canyondam CDP	Plumas County	9.6	14,286	21,301	491	491	-	-	-
California Pines CDP	Modoc County	9.5	13,370	20,386	4,754	4,754	-	-	-
Litchfield CDP	Lassen County	9.5	14,209	21,224	2,525	2,525	-	-	-
Daphnedale Park CDP	Modoc County	9.5	12,772	19,787	852	852	-	-	-
River Pines CDP	Amador County	9.5	13,405	20,421	234	234	-	-	-
Rancho Tehama Reserve CDP	Tehama County	9.4	13,627	20,643	7,449	7,449	-	-	-
Cantua Creek CDP	Fresno County	9.4	13,482	20,497	2,430	2,430	-	-	-
Pine Canyon CDP	Monterey County	9.4	13,509	20,524	2,135	2,097	38	-	-
Stallion Springs CDP	Kern County	9.4	13,212	20,228	10,515	10,515	-	-	-
Wilsonia CDP	Tulare County	9.4	13,425	20,441	174	174	-	-	-
Unincorporated Butte County	Butte County	9.3	12,734	19,626	766,813	762,579	3,843	391	-
Catheys Valley CDP	Mariposa County	9.3	13,849	20,864	14,985	14,956	30	-	-
Greenview CDP	Siskiyou County	9.3	13,891	20,906	829	829	-	-	-
Sheridan CDP	Placer County	9.2	13,190	20,205	16,662	16,662	-	-	-
Butte Creek Canyon CDP	Butte County	9.2	12,833	19,473	13,102	13,102	-	-	-
Sky Valley CDP	Riverside County	9.2	13,347	20,362	15,565	15,565	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Wallace CDP	Calaveras County	9.1	13,388	20,404	2,775	2,775	-	-	-
Cazadero CDP	Sonoma County	9.1	13,298	20,314	4,554	4,554	-	-	-
Unincorporated Sutter County	Sutter County	9.1	13,205	20,134	353,390	350,779	2,447	164	-
Elizabeth Lake CDP	Los Angeles County	9.1	13,441	20,457	3,998	3,998	-	-	-
Mountain Center CDP	Riverside County	9.1	13,475	20,491	1,206	1,206	-	-	-
Unincorporated Nevada County	Nevada County	9.1	12,888	19,904	570,769	560,125	10,322	321	-
Unincorporated Monterey County	Monterey County	9.1	13,092	20,031	1,993,451	1,965,497	26,159	1,795	-
Millville CDP	Shasta County	9.1	12,965	19,981	5,149	5,149	-	-	-
Milford CDP	Lassen County	9.1	15,220	22,236	3,387	3,387	-	-	-
Spring Garden CDP	Plumas County	9.1	14,617	21,632	418	418	-	-	-
Bear Valley CDP	Alpine County	9.0	13,696	20,712	3,300	3,300	-	-	-
Bradley CDP	Monterey County	9.0	13,510	20,525	55	55	-	-	-
Calpine CDP	Sierra County	8.9	13,657	20,672	454	454	-	-	-
Dustin Acres CDP	Kern County	8.9	13,749	20,765	2,353	2,100	253	-	-
Whitewater CDP	Riverside County	8.9	13,252	20,268	6,321	6,321	-	-	-
Salton City CDP	Imperial County	8.9	13,619	20,634	13,720	13,720	-	-	-
Lake Almanor Country Club CDP	Plumas County	8.8	13,325	20,340	1,756	1,756	-	-	-
Trowbridge CDP	Sutter County	8.7	13,145	20,161	4,319	4,319	-	-	-
Keswick CDP	Shasta County	8.7	13,062	20,078	2,162	2,162	-	-	-
Comptche CDP	Mendocino County	8.6	13,501	20,517	738	738	-	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Forbestown CDP	Butte County	8.6	13,595	20,610	4,016	4,016	-	-	-
Piñon Hills CDP	San Bernardino County	8.6	13,564	20,579	20,554	20,128	425	-	-
Nipinnawasee CDP	Madera County	8.6	13,257	20,272	1,974	1,974	-	-	-
Anza CDP	Riverside County	8.6	13,485	20,500	17,661	17,661	-	-	-
Lucerne Valley CDP	San Bernardino County	8.6	13,977	20,993	67,577	64,572	3,005	-	-
Bear Valley Springs CDP	Kern County	8.4	13,381	20,397	26,550	26,550	-	-	-
Unincorporated Fresno County	Fresno County	8.4	12,793	19,671	3,596,982	3,576,289	16,638	4,055	-
Iron Horse CDP	Plumas County	8.4	13,397	20,412	4,956	4,956	-	-	-
Sereno del Mar CDP	Sonoma County	8.4	13,317	20,333	472	472	-	-	-
Valley Ford CDP	Sonoma County	8.3	13,232	20,247	1,691	1,691	-	-	-
Cromberg CDP	Plumas County	8.3	13,718	20,734	5,779	5,779	-	-	-
Dorrington CDP	Calaveras County	8.3	13,915	20,931	2,303	2,303	-	-	-
Mabie CDP	Plumas County	8.3	13,296	20,312	2,330	2,330	-	-	-
Lake Riverside CDP	Riverside County	8.2	13,543	20,559	4,671	4,671	-	-	-
Clay CDP	Sacramento County	8.2	13,376	20,391	4,324	4,324	-	-	-
Forest Ranch CDP	Butte County	8.1	13,173	20,188	8,911	8,911	-	-	-
Unincorporated El Dorado County	El Dorado County	8.1	13,268	20,255	996,699	992,051	4,211	436	-
Douglas City CDP	Trinity County	8.0	13,979	20,995	16,024	16,022	2	-	-
Benton CDP	Mono County	8.0	14,060	21,075	18,229	18,229	-	-	-
Spring Valley CDP	Lake County	8.0	13,399	20,415	3,158	3,158	-	-	-
Bangor CDP	Butte County	8.0	13,371	20,386	8,591	8,591	-	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Bluewater CDP	San Bernardino County	8.0	14,290	21,305	670	670	-	-	-
Fiddletown CDP	Amador County	7.9	13,619	20,634	2,967	2,967	-	-	-
Plumas Eureka CDP	Plumas County	7.9	13,688	20,704	2,544	2,544	-	-	-
Clipper Mills CDP	Butte County	7.9	13,805	20,821	1,113	1,113	-	-	-
Dobbins CDP	Yuba County	7.9	13,839	20,855	4,959	4,959	-	-	-
Mountain Ranch CDP	Calaveras County	7.9	13,744	20,760	26,361	26,361	-	-	-
Coulterville CDP	Mariposa County	7.8	13,816	20,831	2,698	2,698	-	-	-
Lockwood CDP	Monterey County	7.8	14,047	21,062	6,959	6,636	324	-	-
Washington CDP	Nevada County	7.8	13,680	20,696	1,216	1,216	-	-	-
Casmalia CDP	Santa Barbara County	7.8	13,163	20,179	121	121	-	-	-
Unincorporated Riverside County	Riverside County	7.8	13,447	20,408	3,745,238	3,727,915	15,819	1,504	-
Chilcoot-Vinton CDP	Plumas County	7.7	13,560	20,575	8,453	8,453	-	-	-
Three Rocks CDP	Fresno County	7.6	13,661	20,676	480	480	-	-	-
Ducor CDP	Tulare County	7.6	13,594	20,610	391	391	-	-	-
Cold Springs CDP	Tuolumne County	7.6	13,857	20,873	1,110	1,110	-	-	-
Alleghany CDP	Sierra County	7.6	13,699	20,715	223	223	-	-	-
Swall Meadows CDP	Mono County	7.5	13,565	20,581	2,855	2,855	-	-	-
Clio CDP	Plumas County	7.5	13,919	20,935	374	374	-	-	-
Shingletown CDP	Shasta County	7.5	13,635	20,651	15,709	15,709	-	-	-
Big River CDP	San Bernardino County	7.5	14,254	21,270	6,924	6,924	-	-	-
Unincorporated Madera County	Madera County	7.5	13,346	20,356	1,297,470	1,291,701	5,099	670	-
California City city	Kern County	7.5	13,097	20,113	130,311	128,106	2,205	-	-

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						Less than 25	25 - 50	50 - 75	75 and Greater
Stirling City CDP	Butte County	7.5	13,495	20,510	753	753	-	-	-
Camanche Village CDP	Amador County	7.5	13,701	20,716	3,480	3,480	-	-	-
Unincorporated San Benito County	San Benito County	7.5	13,406	20,421	877,940	875,053	2,801	85	-
Artois CDP	Glenn County	7.4	13,698	20,714	1,843	1,843	-	-	-
Grizzly Flats CDP	El Dorado County	7.3	13,785	20,801	4,242	4,242	-	-	-
Tonyville CDP	Tulare County	7.3	13,303	20,318	32	32	-	-	-
Lake Almanor West CDP	Plumas County	7.3	13,843	20,858	1,463	1,463	-	-	-
Bieber CDP	Lassen County	7.3	14,717	21,732	1,048	1,048	-	-	-
Coleville CDP	Mono County	7.2	14,324	21,340	8,823	8,823	-	-	-
Lytle Creek CDP	San Bernardino County	7.2	13,435	20,450	3,851	3,851	-	-	-
C-Road CDP	Plumas County	7.1	13,910	20,925	1,703	1,703	-	-	-
Beckwourth CDP	Plumas County	7.0	13,665	20,681	7,477	7,477	-	-	-
Mesa Vista CDP	Alpine County	7.0	14,169	21,185	3,120	3,120	-	-	-
Unincorporated Kern County	Kern County	7.0	13,001	19,851	4,607,723	4,574,756	24,891	8,075	-
Forest Meadows CDP	Calaveras County	6.9	13,909	20,925	3,619	3,619	-	-	-
Unincorporated Yuba County	Yuba County	6.9	13,703	20,704	350,978	349,755	1,010	212	-
Unincorporated San Luis Obispo County	San Luis Obispo County	6.9	13,354	20,326	2,005,942	1,994,723	10,270	949	-
Indio Hills CDP	Riverside County	6.9	13,644	20,659	13,773	13,773	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Unincorporated Mendocino County	Mendocino County	6.8	13,294	20,309	2,196,886	2,188,581	7,595	710	-
Sierra City CDP	Sierra County	6.8	13,947	20,962	1,376	1,376	-	-	-
Ocotillo CDP	Imperial County	6.8	14,258	21,273	5,673	5,673	-	-	-
Unincorporated Amador County	Amador County	6.7	13,672	20,688	342,690	341,297	1,393	-	-
Floriston CDP	Nevada County	6.7	13,956	20,971	608	608	-	-	-
Pearsonville CDP	Inyo County	6.7	13,587	20,602	2,650	2,650	-	-	-
Grimes CDP	Colusa County	6.6	13,620	20,636	1,447	1,447	-	-	-
McGee Creek CDP	Mono County	6.6	13,634	20,650	2,568	2,568	-	-	-
Unincorporated Lake County	Lake County	6.6	13,318	20,334	765,151	755,067	10,071	12	-
Wheatland city	Placer County	6.6	13,634	20,649	51	51	-	-	-
Unincorporated Kings County	Kings County	6.6	12,852	19,803	850,829	844,426	6,290	112	-
Stonyford CDP	Colusa County	6.6	14,089	21,105	1,854	1,854	-	-	-
Tuttletown CDP	Tuolumne County	6.5	13,781	20,797	4,704	4,704	-	-	-
Flournoy CDP	Tehama County	6.4	13,792	20,807	3,710	3,710	-	-	-
China Lake Acres CDP	Kern County	6.4	15,969	22,235	3,334	3,334	-	-	-
Trinity Center CDP	Trinity County	6.4	14,083	21,098	3,348	3,348	-	-	-
Markleeville CDP	Alpine County	6.4	14,283	21,299	4,180	4,180	-	-	-
Lake City CDP	Modoc County	6.4	14,355	21,371	3,723	3,723	-	-	-
Hood CDP	Sacramento County	6.4	13,647	20,663	202	202	-	-	-
Rackerby CDP	Butte County	6.4	13,863	20,879	1,890	1,890	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Lake Don Pedro CDP	Mariposa County	6.3	14,084	21,100	8,036	8,036	-	-	-
Tennant CDP	Siskiyou County	6.3	14,192	21,207	155	155	-	-	-
Topaz CDP	Mono County	6.3	14,120	21,136	1,966	1,966	-	-	-
Unincorporated Tuolumne County	Tuolumne County	6.3	13,672	20,688	1,362,243	1,355,227	6,929	86	-
Old Station CDP	Shasta County	6.2	13,780	20,795	1,421	1,421	-	-	-
Junction City CDP	Trinity County	6.1	14,462	21,477	17,857	17,857	-	-	-
Elmira CDP	Solano County	6.1	13,656	20,671	340	340	-	-	-
Yankee Hill CDP	Butte County	6.0	13,815	20,831	3,856	3,856	-	-	-
Berry Creek CDP	Butte County	6.0	13,897	20,912	36,557	36,557	-	-	-
Leona Valley CDP	Los Angeles County	6.0	13,871	20,887	11,898	11,898	-	-	-
Big Bend CDP	Shasta County	6.0	13,954	20,970	3,670	3,670	-	-	-
Cuyama CDP	Santa Barbara County	5.9	14,037	21,052	290	290	-	-	-
Unincorporated San Bernardino County	San Bernardino County	5.9	13,911	20,834	11,976,569	11,948,927	20,527	7,114	-
Strawberry CDP	Tuolumne County	5.9	13,975	20,991	334	334	-	-	-
Leggett CDP	Mendocino County	5.8	14,085	21,101	1,731	1,731	-	-	-
Greenhorn CDP	Plumas County	5.8	14,003	21,019	4,295	4,295	-	-	-
Sequoia Crest CDP	Tulare County	5.8	13,531	20,547	654	654	-	-	-
Unincorporated Imperial County	Imperial County	5.7	13,623	20,612	2,624,627	2,617,454	6,992	180	-
Unincorporated Glenn County	Glenn County	5.7	13,548	20,564	834,258	833,784	474	-	-
Ponderosa CDP	Tulare County	5.6	13,948	20,963	519	519	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Unincorporated Shasta County	Shasta County	5.6	13,401	20,390	2,259,469	2,253,095	6,353	21	-
Alpaugh CDP	Tulare County	5.6	13,848	20,863	643	643	-	-	-
Allensworth CDP	Tulare County	5.5	13,836	20,851	1,986	1,986	-	-	-
California Hot Springs CDP	Tulare County	5.5	14,134	21,149	479	479	-	-	-
Randsburg CDP	Kern County	5.5	14,288	21,303	1,220	1,220	-	-	-
La Porte CDP	Plumas County	5.5	14,028	21,044	2,853	2,853	-	-	-
Gold Mountain CDP	Plumas County	5.5	14,046	21,062	3,896	3,896	-	-	-
Chinese Camp CDP	Tuolumne County	5.4	14,342	21,358	575	575	-	-	-
Camp Nelson CDP	Tulare County	5.4	14,174	21,190	793	793	-	-	-
North Edwards CDP	Kern County	5.4	13,733	20,749	8,157	7,717	441	-	-
Concow CDP	Butte County	5.4	13,855	20,870	17,540	17,154	386	-	-
Verdi CDP	Sierra County	5.4	14,302	21,317	2,671	2,667	4	-	-
Unincorporated Tehama County	Tehama County	5.3	13,540	20,555	1,815,858	1,809,929	5,855	75	-
Round Valley CDP	Inyo County	5.3	14,090	21,105	8,838	8,838	-	-	-
Squaw Valley CDP	Fresno County	5.3	13,982	20,998	36,197	36,197	-	-	-
Greeley Hill CDP	Mariposa County	5.2	14,294	21,309	13,473	13,473	-	-	-
Unincorporated Humboldt County	Humboldt County	5.1	13,466	20,463	2,173,178	2,169,094	4,076	8	-
Sierra Brooks CDP	Sierra County	5.1	14,088	21,103	877	877	-	-	-
Cassel CDP	Shasta County	4.9	13,813	20,829	1,296	1,296	-	-	-
Coffee Creek CDP	Trinity County	4.9	14,192	21,208	7,373	7,373	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
French Gulch CDP	Shasta County	4.8	14,012	21,027	7,893	7,893	-	-	-
Rail Road Flat CDP	Calaveras County	4.7	14,273	21,288	21,124	21,124	-	-	-
Fort Bidwell CDP	Modoc County	4.7	14,394	21,410	2,048	2,048	-	-	-
Cohasset CDP	Butte County	4.7	13,855	20,871	16,196	16,196	-	-	-
Mesa CDP	Inyo County	4.7	14,258	21,274	2,242	2,242	-	-	-
Aspen Springs CDP	Mono County	4.6	13,893	20,909	2,284	2,284	-	-	-
Darwin CDP	Inyo County	4.5	14,352	21,367	861	861	-	-	-
Unincorporated Colusa County	Colusa County	4.5	13,766	20,781	720,553	719,871	683	-	-
Cherokee CDP	Butte County	4.5	13,616	20,632	1,120	1,120	-	-	-
Paskenta CDP	Tehama County	4.4	14,263	21,278	692	692	-	-	-
Chalfant CDP	Mono County	4.2	14,424	21,439	17,934	17,934	-	-	-
Shoshone CDP	Inyo County	4.2	14,684	21,699	18,375	18,375	-	-	-
Mohawk Vista CDP	Plumas County	4.2	14,410	21,426	7,660	7,660	-	-	-
Robinson Mill CDP	Butte County	4.0	14,185	21,201	843	843	-	-	-
Lodoga CDP	Colusa County	4.0	14,301	21,316	2,168	2,168	-	-	-
Meadow Valley CDP	Plumas County	3.9	14,335	21,350	5,453	5,453	-	-	-
Unincorporated Mariposa County	Mariposa County	3.8	14,309	21,325	852,902	850,978	1,924	-	-
Unincorporated Calaveras County	Calaveras County	3.7	14,132	21,147	535,180	534,712	468	-	-
Alderpoint CDP	Humboldt County	3.7	13,913	20,928	1,554	1,554	-	-	-
Goodyears Bar CDP	Sierra County	3.6	14,286	21,301	1,312	1,312	-	-	-
Desert Center CDP	Riverside County	3.6	14,599	21,614	19,472	19,472	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Paradise CDP	Mono County	3.6	14,194	21,209	2,785	2,785	-	-	-
Hyampom CDP	Trinity County	3.5	14,679	21,695	12,975	12,975	-	-	-
Little Valley CDP	Lassen County	3.5	14,350	21,365	84	84	-	-	-
Lookout CDP	Modoc County	3.5	14,628	21,643	3,414	3,414	-	-	-
Mineral CDP	Tehama County	3.4	14,078	21,093	28,354	28,354	-	-	-
Pike CDP	Sierra County	3.4	14,438	21,453	2,758	2,758	-	-	-
Keddie CDP	Plumas County	3.3	14,240	21,255	421	421	-	-	-
Posey CDP	Tulare County	3.3	14,371	21,386	228	228	-	-	-
Johnsville CDP	Plumas County	3.2	14,768	21,784	8,807	8,807	-	-	-
Unincorporated Siskiyou County	Siskiyou County	3.2	13,981	20,997	3,989,804	3,985,822	3,982	-	-
Hat Creek CDP	Shasta County	3.1	14,207	21,222	32,008	32,008	-	-	-
Pine Flat CDP	Tulare County	3.1	14,391	21,406	744	744	-	-	-
Furnace Creek CDP	Inyo County	3.0	14,649	21,665	19,970	19,970	-	-	-
Hartland CDP	Tulare County	2.9	14,342	21,357	391	391	-	-	-
Mad River CDP	Trinity County	2.7	14,780	21,795	22,666	22,666	-	-	-
Unincorporated Alpine County	Alpine County	2.7	14,379	21,395	458,555	458,555	-	-	-
Belden CDP	Plumas County	2.6	14,117	21,133	390	390	-	-	-
Manton CDP	Tehama County	2.5	14,423	21,438	11,326	11,326	-	-	-
Kennedy Meadows CDP	Tulare County	2.5	15,107	22,122	3,727	3,727	-	-	-
Poso Park CDP	Tulare County	2.4	14,710	21,725	28	28	-	-	-
Bucks Lake CDP	Plumas County	2.4	14,039	21,055	6,619	6,619	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Cedar Slope CDP	Tulare County	2.4	14,560	21,576	445	445	-	-	-
Indian Falls CDP	Plumas County	2.3	14,362	21,378	1,179	1,179	-	-	-
Panorama Heights CDP	Tulare County	2.3	14,675	21,691	304	304	-	-	-
Mono City CDP	Mono County	2.3	14,734	21,749	3,471	3,471	-	-	-
Idlewild CDP	Tulare County	2.2	14,603	21,618	294	294	-	-	-
New Pine Creek CDP	Modoc County	2.0	14,871	21,886	1,451	1,451	-	-	-
Beale AFB CDP	Yuba County	1.9	14,738	21,753	6,488	6,488	-	-	-
Tecopa CDP	Inyo County	1.9	15,193	22,208	11,897	11,897	-	-	-
Olancho CDP	Inyo County	1.9	14,716	21,732	5,018	5,018	-	-	-
Graniteville CDP	Nevada County	1.8	14,691	21,707	952	952	-	-	-
Mount Hebron CDP	Siskiyou County	1.8	14,604	21,620	457	457	-	-	-
Unincorporated Mono County	Mono County	1.6	14,420	21,435	1,837,352	1,837,011	342	-	-
Unincorporated Inyo County	Inyo County	1.6	14,305	21,320	6,395,211	6,394,309	903	-	-
Unincorporated Lassen County	Lassen County	1.4	14,467	21,483	2,866,515	2,865,885	618	12	-
Smartsville CDP	Yuba County	1.3	14,592	21,607	459	459	-	-	-
Unincorporated Plumas County	Plumas County	1.2	14,223	21,239	1,481,027	1,479,980	1,047	-	-
Unincorporated Trinity County	Trinity County	1.1	14,752	21,768	1,852,876	1,852,743	133	-	-
Unincorporated Modoc County	Modoc County	0.9	14,590	21,605	2,476,640	2,476,301	339	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Unincorporated Sierra County	Sierra County	0.8	14,447	21,462	593,569	593,569	-	-	-
Paynes Creek CDP	Tehama County	0.8	14,650	21,666	2,195	2,195	-	-	-
Paxton CDP	Plumas County	0.8	14,743	21,758	213	213	-	-	-
Johannesburg CDP	Kern County	0.6	14,936	21,952	1,546	1,546	-	-	-
Bear Valley CDP	Mariposa County	0.4	14,833	21,848	4,631	4,631	-	-	-
Trona CDP	Inyo County	0.3	15,103	22,118	5,950	5,950	-	-	-
Little Grass Valley CDP	Plumas County	0.2	14,621	21,637	6,399	6,399	-	-	-
Cartago CDP	Inyo County	0	15,077	22,093	748	748	-	-	-
Mount Laguna CDP	San Diego County	0	14,825	21,840	1,086	1,086	-	-	-
Warner Valley CDP	Plumas County	0	N/A	N/A	11,134	11,134	-	-	-
Caribou CDP	Plumas County	0	14,473	21,488	103	103	-	-	-
Sugarloaf Saw Mill CDP	Tulare County	0	14,920	21,935	62	62	-	-	-
Twain CDP	Plumas County	0	15,017	22,033	4,602	4,602	-	-	-
Eagleville CDP	Modoc County	0	14,834	21,850	621	621	-	-	-
Homewood Canyon CDP	Inyo County	0	15,218	22,234	6,560	6,560	-	-	-
Sugarloaf Village CDP	Tulare County	0	14,749	21,764	43	43	-	-	-
Sattley CDP	Sierra County	0	14,912	21,927	1,310	1,310	-	-	-
McClenney Tract CDP	Tulare County	0	15,102	22,117	394	394	-	-	-
Lake Davis CDP	Plumas County	0	14,877	21,892	3,479	3,479	-	-	-
Tobin CDP	Plumas County	0	14,644	21,660	3,218	3,218	-	-	-
Valley Wells CDP	Inyo County	0	15,219	22,235	6,828	6,828	-	-	-
Hornitos CDP	Mariposa County	0	14,951	21,967	746	746	-	-	-

Location	County	1) Infill VMT Index Value, Average	2) Modeled VMT: Low-Income 3-Person Household, 2 Children, Average	3) Modeled VMT: Middle-Income 4-Person Household, 2 Children, Average	Total Land Acres	4) Acres of Land by Infill VMT Index Value			
						Less than 25	25 - 50	50 - 75	75 and Greater
Ruth CDP	Trinity County	0	15,272	22,287	24,856	24,856	-	-	-
Silver City CDP	Tulare County	0	N/A	N/A	368	368	-	-	-
Storrie CDP	Plumas County	0	14,684	21,699	54	54	-	-	-
Butte Meadows CDP	Butte County	0	14,768	21,784	1,372	1,372	-	-	-
Sugarloaf Mountain Park CDP	Tulare County	0	14,700	21,716	68	68	-	-	-
Average		30	11,078	17,798	62,822	59,984	1,450	1,361	28
Median		30	11,256	17,973	2,815	1,348	392	0	0

Appendix D: ClimatePlan Investment without Displacement Platform



ClimatePlan's Commitment to Investment without Displacement

The ClimatePlan network's vision is to create a healthier, more sustainable California, where people of all backgrounds and incomes have the opportunity to thrive. We can create a California in which all of us, especially lower-income and people of color, have the option to live in communities where we can find and stay in a home we can afford, close to good jobs and schools; where it is convenient, safe, dignified, and affordable to get around on public transit, on foot, by bike, or by scooter; where there is plentiful clean air and water; where public parks are accessible and farmland and natural lands are protected. We can build development and invest in infrastructure that reduces greenhouse gas emissions. As a multi-sector network, we advance policies and leverage the resources and partnerships necessary to realize this vision.

California is in the midst of an affordability crisis. Without careful planning and policies, new investment in existing neighborhoods or ongoing disinvestment in areas where low-income people live can push lower-income and people of color out of their own communities and away from jobs and transit. This exacerbates historical inequities, forces more driving and climate pollution from those who have the highest propensity to ride transit, re-segregates our towns and cities, and destroys natural and agricultural lands. ClimatePlan recognizes that displacement threatens to undermine all of our network's priorities including climate, equity, health, active transportation, and conservation; it is a central challenge to building a more sustainable and equitable California.

Displacement harms people and communities and worsens the climate crisis. Recognizing these profound impacts, beginning in April 2018, ClimatePlan convened partners from housing, transportation, land use, equity, conservation and climate organizations to develop a shared policy platform on *Investment Without Displacement* for guiding the ClimatePlan network's advocacy. Over 20 participants worked collaboratively to develop the approach and solutions outlined below.

Our Goal

Ensure that investment in communities provides direct and meaningful benefits to residents and does not displace them.

Our Approach

What “displacement” means to us in this context: *A forced or responsive move due to changes in one’s home or neighborhood.*

- A “forced” move can also be referred to as “physical” or “direct” displacement.
- A “responsive” move is also known as “economic” or “indirect” displacement and occurs when a resident unwillingly leaves his or her home due to rising rents, habitability or similar issues.

Displacement is related to systems of power and oppression, including racism and classism and patterns of investment, disinvestment, and exclusion. America’s history of segregation and redlining has contributed to historical exclusion of households from a neighborhood due to race, income, or other factors. This further limits neighborhood access and housing choices.

Who we are most concerned about displacing: *Renters, low-income people of color, and other vulnerable populations who have little to no resources to stay in their communities.*

Secondarily, we are concerned about losing neighborhood-serving small businesses and community institutions that bind neighbors together and create a distinct sense of place.

Which types of “investment” are we most concerned about?

1. *Public dollars for infrastructure and financing*
2. *Private market rate real estate development*
3. *Government actions that create windfall value for private entities, e.g., upzoning sites and streamlining regulations.*
4. *Any combination of the above*

Public and private investments can shape and influence communities in negative ways. For example, federal and state transportation dollars have built roads and highways through many cities, destroying the fabric of the community and increasing climate pollutants for residents. Public and private investments can also be a stabilizing and empowering force for communities if structured appropriately and designed in collaboration with communities. ClimatePlan promotes investments that reduce greenhouse gas emissions, are shaped by residents, and provide direct benefits and support to communities, specifically those that have been historically underserved and neglected.

Our Recommendations

The following nine principles guide our analysis of proposed policies to ensure they achieve investment without displacement. The signatory organizations to this document endorse these principles as overall goals which campaigns, legislation, investments, and policy proposals should strive to incorporate based on context, scope, and specific situations. The organizations signing onto this document commit to giving these recommendations weight as they evaluate such proposals and arrive at specific positions.

- 1) All renters should be protected from excessive rent increases through local, regional, and/or statewide rent stabilization.
- 2) Market-rate housing developers should not receive a public incentive (such as streamlining, reduced parking requirements, reduced open space requirements, etc.) for housing development that displaces existing households or demolishes homes occupied by or affordable to lower-income tenants. The state should not displace existing households or demolish them.
 - (a) However, exceptions should be considered where:
 - b) New development results in a *significant increase* in the number of homes
 - (a) Affordable to lower-income renters, and
 - c) Existing residents are fairly relocated at the developer's cost to comparable
 - (a) Housing in near proximity and given the right to return to the new development in comparable units at their original rent level.
- 3) All renters should be protected from unwarranted eviction through a statewide "Just Cause" law. The Ellis Act, which allows landlords to evict residential tenants under the premise of "getting out of the rental business," must also be reformed.
- 4) The state needs to significantly increase state funding to preserve existing homes affordable to very low-income Californians and build new homes they can afford.
- 5) Any residential developer who takes advantage of public incentives that increase a property's value or decrease development costs must use a portion of that financial windfall to benefit the community by including extremely and very low-income affordable homes in the new development.
- 6) Major public investments should provide capacity-building and technical assistance for local community-based nonprofit organizations and institutions, so they can compete for contracts or grants related to the investment.
- 7) Major public investments should also provide assistance to local and disadvantaged residents in the form of career development, apprenticeship, and employment opportunities in both construction and any permanent jobs created by the investment.
- 8) All major investments should include meaningful community participation in every aspect of project design.
- 9) All new multifamily housing of 10 units or more developed near transit or benefitting from other public resources should include extremely and very low-income affordable homes, on site or off site in near proximity.