However, VMT as a metric raises a few questions related to methodology and significance thresholds. Although LOS, where methodology was driven by the Highway Capacity Manual (HCM) and significant impact determinations were the sole discretion of the public agency reviewing the project, the shift to VMT does not have an equivalent methodology. Unlike LOS, where methodology was driven by the Highway Capacity Manual (HCM) and significant impact determinations were the sole discretion of the public agency reviewing the project, the shift to VMT does not have an equivalent methodology. Unlike LOS, where methodology was driven by the Highway Capacity Manual (HCM) and significant impact determinations were the sole discretion of the public agency reviewing the project, the shift to VMT does not have an equivalent methodology. Unlike LOS, where methodology was driven by the Highway Capacity Manual (HCM) and significant impact determinations were the sole discretion of the public agency reviewing the project, the shift to VMT does not have an equivalent methodology.

California, with the passage of Senate Bill (SB) 743, is changing conventional practice by shifting the focus of transportation impact analysis from driving (LOS) to the impact on public health by encouraging infill development, multimodal networks, and a diversity of land use. This is accomplished by introducing VMT as the new metric of analysis. However, VMT as a metric raises a few questions related to methodology and significance thresholds.

- Unlike LOS, where methodology was driven by the Highway Capacity Manual (HCM) and significant impact determinations were the sole discretion of the public agency reviewing the project, the shift to VMT does not have an equivalent methodology.
- VMT analysis for SB 743 purposes differs from current analysis of VMT for air quality, greenhouse gases (GHG), or energy impact analysis. In California, federal and state laws establish clear thresholds related to public health and environmental protection objectives. Therefore, determining what levels of VMT change is significant when not relying on the related effects of fuel consumption is much more difficult.

To address the emerging SB 743 implementation questions, the authors developed implementation guidance including consistent framework to define the critical steps and choices for public agencies. More implementation details and the full set of flowcharts are available at http://www.fehrpeers.com/sb743.