

# Appendix H

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## VMT Assessment



**MEMORANDUM**

**Date:** 10.13.2020

**To:** Jonathan Frankel

**From:** Billing Liu & Steven J Brown, PE

**Subject:** VMT Assessment for Proposed Sierra Madre Residential Project

OC20-0744

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This document summarizes our assessment of the Vehicle Miles Traveled (VMT) of the proposed residential project in City of Sierra Madre. The project is proposed as a 42-unit residential subdivision adjacent to the retreat center in Sierra Madre. Based on the site plan, the project will be built on a vacant land in Parcel 5761-002-008. This memorandum describes relevant VMT regulations and assesses the proposed project’s VMT impact using Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) travel demand model.

**Regulatory Setting**

Senate Bill 743

Senate Bill (SB) 743, passed in 2013, requires that, vehicle miles traveled (VMT) be the primary metric used to identify transportation impacts under CEQA. The Office of Planning and Research prepared a Technical Advisory that provides recommendations related to VMT and reduction targets. Specifically, they recommend isolating trips by trip purpose (e.g. for residential uses, only focus on the Home-base trip on the production side and targeting a reduction target for VMT per capita of 15% below the existing VMT per capita for the region or City. The City of Sierra Madre recently adopted thresholds of significance and VMT screening criteria and is in the process of developing new transportation study guidelines to reflect these changes.

Significance Criteria

The City adopted the following criteria related to VMT. Namely, a VMT-related impact would be considered significant if implementation of the proposed project meets the following two conditions:

- The baseline project generated VMT per service population or Home-based VMT per capita or Home-based-work VMT per employee exceeds the 15% below the Northwest Region<sup>1</sup> baseline<sup>2</sup> VMT, or
- The cumulative project generated VMT exceeds 15% below the Northwest Region baseline VMT.

## Project VMT Screening

Prior to initiating a VMT assessment, the City has identified project screening criteria pursuant to California Environmental Quality Act (CEQA) guidance provided by OPR. If a project meets any one of the following three screening criteria, then no further VMT assessment is required.

### 1. Project Type Screening

OPR identified local serving project types that may be presumed to have a less than significant impact absent substantial evidence to the contrary. These include uses such as resident and/or employee serving uses like retail, daycare facilities, parks, gas stations, and the like. This screening criteria also allows for projects generating fewer than 110 daily trips to be screened out. For residential land use, projects generating less than 110 daily vehicle trips<sup>3</sup> typically corresponds with the following:

- 11 single family housing units
- 16 multi-family, condominiums, or townhouse housing units

The proposed project has 42 single family subdivisions, and therefore, cannot be screened out under this criteria.

### 2. Transit Priority Area (TPA) Screening

Projects located within a TPA<sup>4</sup> may be presumed to have a less than significant impact. The proposed project is not located within a TPA.

<sup>1</sup> The City of Sierra Madre is located in the Northwest region of San Gabriel Valley Council of Governments (SGVCOG).

<sup>2</sup> Baseline data is available from the SCAG model or appropriate sub-area model approved by the City Traffic Engineer. This data is also available in the SGVCOG VMT Assessment Tool. Baseline conditions typically represent the year of the Notice of Preparation (NOP). Interpolation between the base and future year model will be required to identify the VMT representative of the baseline year.

<sup>3</sup> This threshold ties directly to the OPR technical advisory and notes that CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

<sup>4</sup> A TPA is defined as a half-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor per the definitions below.

### 3. Low VMT Area Screening

Residential projects located within a low VMT-generating area may be presumed to have a less than significant impact and screened out. As defined by the City, a low VMT zone has VMT per service population 15 percent or more below the Northwest Region Baseline VMT. Appendix A present the low VMT screening map. The proposed project would **satisfy the screening criteria** based upon the Origin-Destination (OD) method as summarized in Table 1 and can be screened out from VMT assessment.

*Table 1 – OD VMT Analysis*

Analysis Metrics: OD VMT	2012 Base Year	2040 Cumulative Year
Project TAZ VMT per Service Population	31.01	30.47
2012 Baseline Northwest Region VMT Service Population	37.02	
Percent Difference with 2012 Baseline	-16%	-18%

The City also accepts to extract the Project-generated VMT using production-attraction (PA) trip matrices if appropriate. As a pilot study in San Gabriel Valley Council of Governments (SGVCOG) SB743 project<sup>5</sup>, the Project was evaluated using Home-based VMT per capita and failed in screening. The Project area is a mixed-use area with an adjacent Mater Dolorosa Retreat Center which attracts trips other than Home-based trips. Therefore, it is more appropriate to evaluate the VMT impact from all trip purposes and use the OD method to determine the screening result. Therefore, the project as proposed would “screen out” and no further VMT analysis is needed.

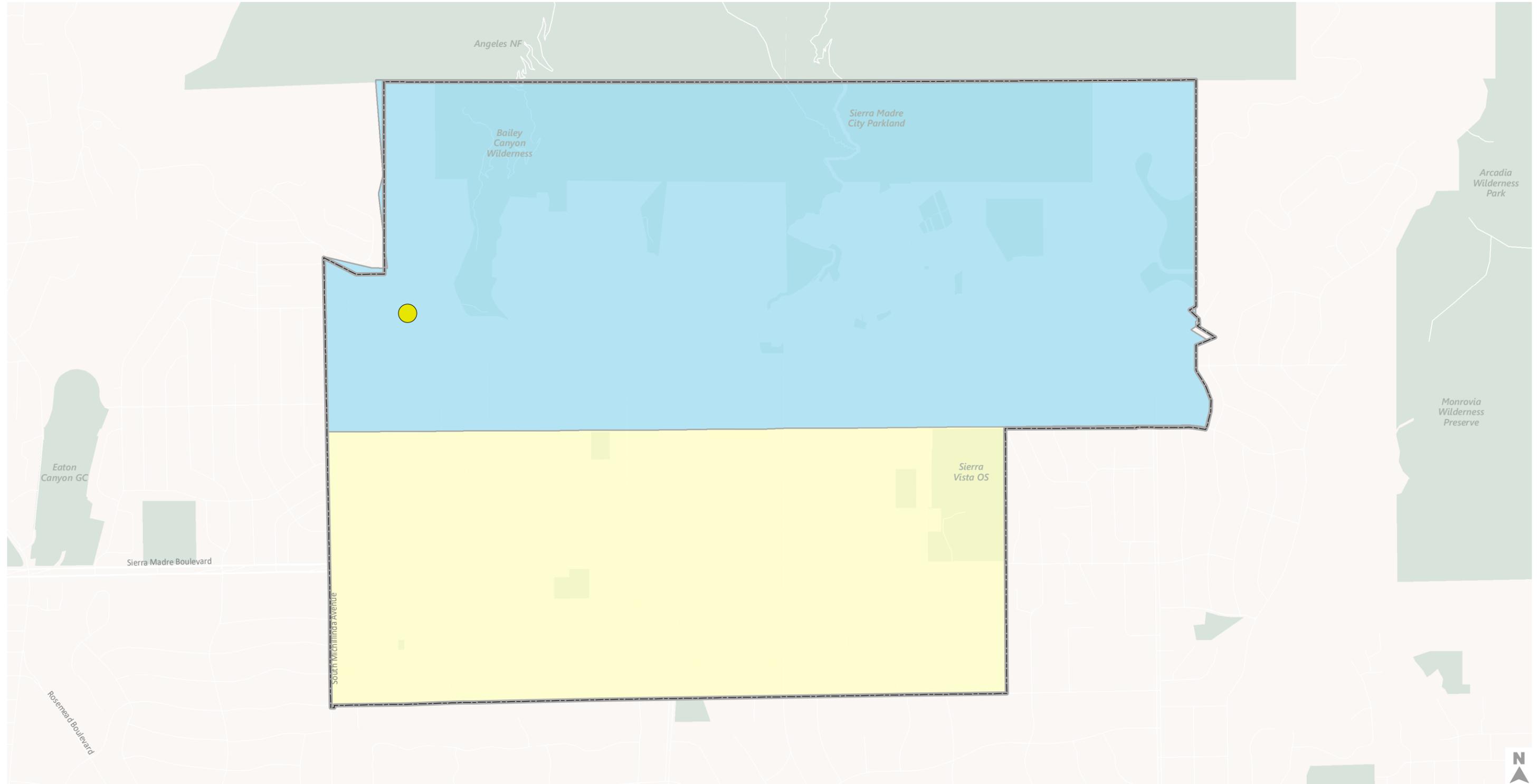
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Pub. Resources Code, § 21064.3 - ‘Major transit stop’ means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

Pub. Resources Code, § 21155 - For purposes of this section, 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.

<sup>5</sup> SGVCOG VMT Screening for Test Projects Memo, June 18, 2020.

# Appendix A: Low VMT Screening Map for Sierra Madre



- VMT per Service Population Comparison     City Boundary     Project Location
-  15% or more below Subarea Average
  -  0 to 15% below Subarea Average
  -  Higher than Subarea Average

