



DRAFT

MEMORANDUM

TO: Glauco Lolli-Ghetti, Palatine Capital Partners Acquisitions, LLC

FROM: Patrick A. Gibson, P.E., PTOE
Richard Gibson, LEED Green Associate

DATE: July 27, 2021

RE: Vehicle Miles Traveled Screening Evaluation for the
18618 Oxnard Street Self-Storage Project
Tarzana, California

Ref: J1931

Gibson Transportation Consulting, Inc. reviewed the proposed self-storage development (Project) at 18618 Oxnard Street in the Tarzana community of the City of Los Angeles (City) and prepared vehicle miles traveled (VMT) and trip generation analyses for the Project. This memorandum summarizes the results of our analyses.

PROJECT DESCRIPTION

The Project proposes to construct 103,500 square feet (sf) of gross building area containing a self-storage facility. The site is currently occupied by a 47,136 sf building containing Columbia College Hollywood, a film and graphic design college with a student enrollment of approximately 870 students.¹ The building will be adaptively re-used as part of the Project to provide approximately 52,000 sf of self-storage area. An additional 51,500 sf building will be constructed on the existing surface parking lot. The Project will provide 23 parking spaces in a surface parking lot along the western edge of the buildings. The Project site plan is shown in Figure 1.

METHODOLOGY

The City adopted *Transportation Assessment Guidelines* (Los Angeles Department of Transportation [LADOT], July 2020) (TAG), which establishes the methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) guidelines from the State of California Governor’s Office of Planning and Research in its implementation of Senate Bill 743 (Steinberg, 2013) (SB 743), which requires that a project’s potential CEQA transportation impacts be evaluated based on VMT.

¹ Data from National Center for Education Statistics
(<https://nces.ed.gov/collegenavigator/?q=columbia+college+hollywood&s=CA&id=112570#retgrad>)

Per the TAG, SB 743 “directed lead agencies to revise transportation assessment guidelines to include a transportation performance metric that promotes: the reduction of greenhouse gas emissions, the development of multi modal networks, and access to diverse land uses.” The intention of SB 743 is to encourage development that shortens the distance between housing, jobs, and services, increases the availability of affordable housing options in proximity to public transit, offers attractive non-vehicular transportation alternatives, provides strong transportation demand management programs, and promotes walking and bicycling trips.

Section 1.3 of the TAG outlines initial screening criteria to determine if a transportation for a development project is required:

- *If the Development Project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a Development Project is required.*
- *If a Transportation Project is likely to either: (1) induce additional vehicle miles traveled by increasing vehicle capacity; or (2) reduce roadway through-lane capacity on a street that exceeds 750 vehicles per hour per lane for at least two (2) consecutive hours in a 24-hour period after the project is completed, a transportation assessment is generally required.*
- *A transportation assessment is required by City ordinance or regulation.*

If the above screening criteria are not met, then a transportation assessment is not required. Further, per Section 2.2.2 of the TAG, a “no impact” determination can be made for a project if either of the following screening criteria are not met for Threshold T-2:

- *T-2.1-1: Would the land use project generate a net increase of 250 or more daily vehicle trips?*
- *T-2.1-2: Would the project generate a net increase in daily VMT?*

SCREENING ANALYSIS

Application of *City of Los Angeles VMT Calculator Version 1.3* (LADOT, July 2020) (VMT Calculator) showed that the Project is expected to generate a total of 221 daily trips, a net reduction of 368 daily trips when accounting for the existing use.² Since this result does not meet the threshold of 250 net daily vehicle trips, a transportation assessment is not required. Further, the Project would not result in any significant VMT transportation impacts and no mitigation measures are required.

The VMT Calculator screening results are provided in the Attachment.

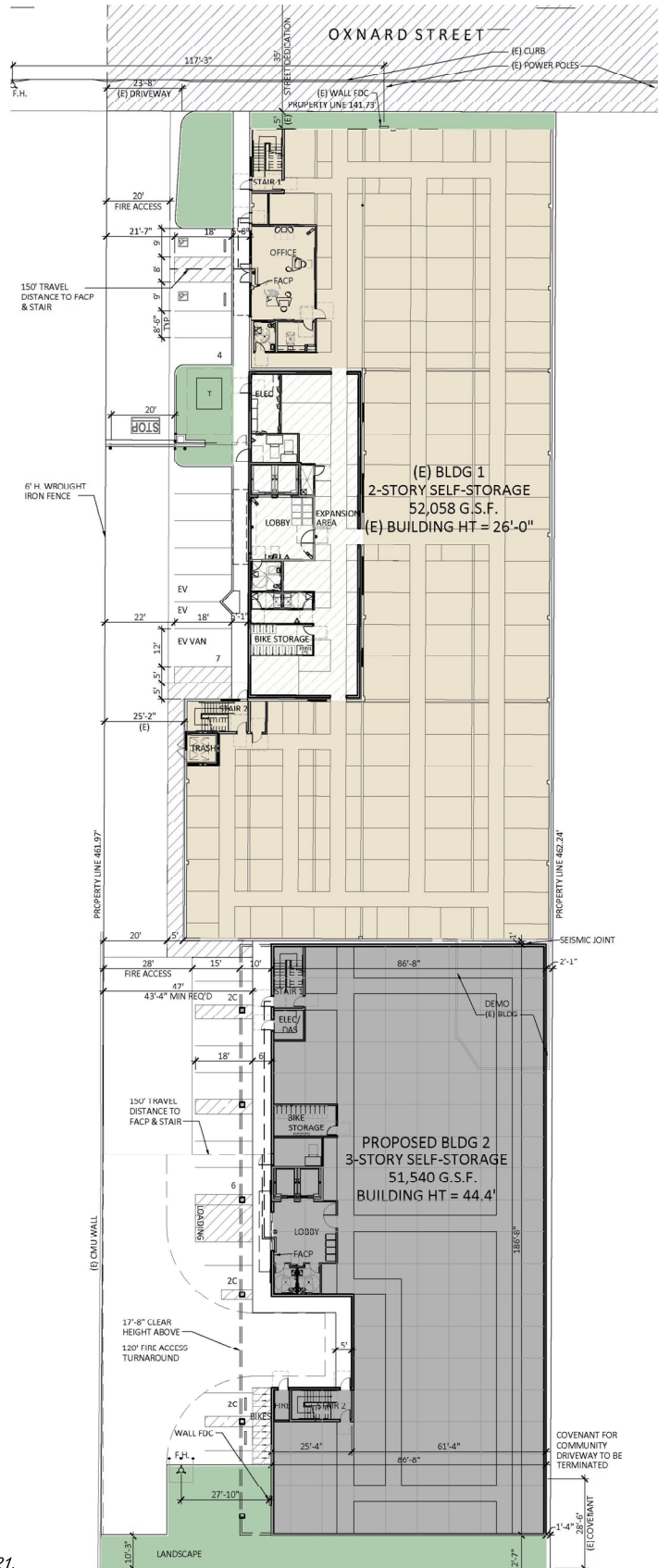
² To be conservative, a student population of 435 students (one-half the estimated enrollment) was used for the analysis.

PEAK HOUR TRIP GENERATION

While the Project will not result in a significant transportation impact according to the VMT screening analysis, peak hour trip generation volumes are provided in Table 1 for informational purposes. As shown, after trip reduction credits for existing uses, the Project will generate a net reduction of 55 trips (45 inbound, 10 outbound) in the morning peak hour and a net reduction of 47 trips (13 inbound, 34 outbound) during the afternoon peak hour.

CONCLUSION

Based on the analysis detailed above, the Project would not generate enough daily traffic to warrant a transportation assessment and would not result in VMT impacts. The Project would reduce peak hour traffic at nearby intersections due to the replacement of an existing use that generates greater traffic demand.



Source: Palatine Capital Partners. June, 2021.



PROJECT SITE PLAN

FIGURE 1

**TABLE 1
PROJECT TRIP GENERATION**

TRIP GENERATION RATES [a]									
Land Use	ITE Land Use	Rate	Daily	Morning Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
Mini-Warehouse	151	per ksf	[b]	60%	40%	0.10	47%	53%	0.17
University/College	550	per student	[b]	78%	22%	0.15	32%	68%	0.15

TRIP GENERATION ESTIMATES									
Land Use	ITE Land Use	Size	Daily	Morning Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
<u>Existing Use Credits</u>									
University/College	550	435 students [c]	(589)	(51)	(14)	(65)	(21)	(44)	(65)
TOTAL - EXISTING USE CREDIT			(589)	(51)	(14)	(65)	(21)	(44)	(65)
<u>Proposed Project</u>									
Mini-Warehouse	151	103.500 ksf	221	6	4	10	8	10	18
TOTAL - PROPOSED PROJECT			221	6	4	10	8	10	18
NET NEW TRIPS			(368)	(45)	(10)	(55)	(13)	(34)	(47)

Notes:

ksf = 1,000 square feet

[a] Source: *Trip Generation, 10th Edition*, Institute of Transportation Engineers, 2017 unless otherwise noted.

[b] Source: LADOT VMT Calculator version 1.3

[c] To be conservative a student populaiotn of 50% enrollment was assumed

Attachment

VMT Calculator Worksheets

CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



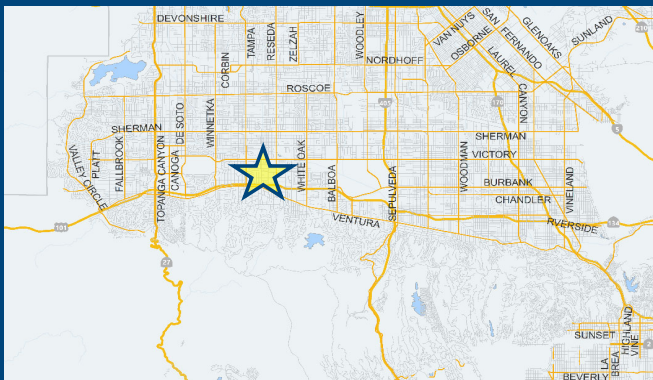
Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project:

Scenario:

Address:



Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit

Yes No

Existing Land Use

Land Use Type	Value	Unit
School University		Students
School University	435	Students

Click here to add a single custom land use type (will be included in the above list)

Proposed Project Land Use

Land Use Type	Value	Unit
Industrial Warehousing/Self-Storage		ksf
Industrial Warehousing/Self-Storage	103.5	ksf

Click here to add a single custom land use type (will be included in the above list)

Project Screening Summary

Existing Land Use	Proposed
589 Daily Vehicle Trips	221 Daily Vehicle Trips
4,869 Daily VMT	1,891 Daily VMT
Tier 1 Screening Criteria	
Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. <input type="checkbox"/>	
Tier 2 Screening Criteria	
The net increase in daily trips < 250 trips	-368 Net Daily Trips
The net increase in daily VMT ≤ 0	-2,978 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	0.000 ksf
The proposed project is not required to perform VMT analysis.	



CITY OF LOS ANGELES VMT CALCULATOR Version 1.3

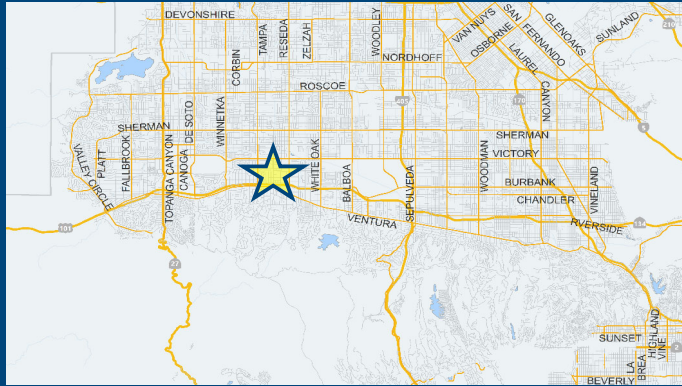


Project Information

Project:

Scenario:

Address:



Proposed Project Land Use Type	Value	Unit
Industrial Warehousing/Self-Storage	103.5	ksf

TDM Strategies

Select each section to show individual strategies
 Use to denote if the TDM strategy is part of the proposed project or is a mitigation strategy

Max Home Based TDM Achieved? Proposed Project: No With Mitigation: No
 Max Work Based TDM Achieved? Proposed Project: No With Mitigation: No

A Parking

Reduce Parking Supply city code parking provision for the project site: 100
 actual parking provision for the project site: 0
 Proposed Prj Mitigation

Unbundle Parking monthly parking cost (dollar) for the project site: 175
 Proposed Prj Mitigation

Parking Cash-Out percent of employees eligible: 50
 Proposed Prj Mitigation

Price Workplace Parking daily parking charge (dollar): 6.00
 percent of employees subject to priced parking: 100
 Proposed Prj Mitigation

Residential Area Parking Permits cost (dollar) of annual permit: 200
 Proposed Prj Mitigation

- B Transit
- C Education & Encouragement
- D Commute Trip Reductions
- E Shared Mobility
- F Bicycle Infrastructure
- G Neighborhood Enhancement

Analysis Results

Proposed Project	With
221 Daily Vehicle Trips	221 Daily Vehicle Trips
1,891 Daily VMT	1,891 Daily VMT
N/A Household VMT per Capita	N/A Household VMT
N/A Work VMT per Employee	N/A Work VMT per Employee
Significant VMT Impact?	
Household: N/A Threshold = 9.4 15% Below APC	Household: N/A Threshold = 9.4 15% Below APC
Work: N/A Threshold = 11.6 15% Below APC	Work: N/A Threshold = 11.6 15% Below APC



CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: July 6, 2021

Project Name: 18618 Oxnard Street Self-Storage

Project Scenario: With Project

Project Address: 18618 W OXNARD ST, 91356



Version 1.3

Project Information			
Land Use Type		Value	Units
Housing	Single Family	0	DU
	Multi Family	0	DU
	Townhouse	0	DU
	Hotel	0	Rooms
	Motel	0	Rooms
Affordable Housing	Family	0	DU
	Senior	0	DU
	Special Needs	0	DU
	Permanent Supportive	0	DU
Retail	General Retail	0.000	ksf
	Furniture Store	0.000	ksf
	Pharmacy/Drugstore	0.000	ksf
	Supermarket	0.000	ksf
	Bank	0.000	ksf
	Health Club	0.000	ksf
	High-Turnover Sit-Down Restaurant	0.000	ksf
	Fast-Food Restaurant	0.000	ksf
	Quality Restaurant	0.000	ksf
	Auto Repair	0.000	ksf
	Home Improvement	0.000	ksf
	Free-Standing Discount	0.000	ksf
	Movie Theater	0	Seats
	Office	General Office	0.000
Medical Office		0.000	ksf
Industrial	Light Industrial	0.000	ksf
	Manufacturing	0.000	ksf
	Warehousing/Self-Storage	103.500	ksf
School	University	0	Students
	High School	0	Students
	Middle School	0	Students
	Elementary	0	Students
	Private School (K-12)	0	Students
Other		0	Trips

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: July 6, 2021

Project Name: 18618 Oxnard Street Self-Storage

Project Scenario: With Project

Project Address: 18618 W OXNARD ST, 91356



Version 1.3

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: July 6, 2021

Project Name: 18618 Oxnard Street Self-Storage

Project Scenario: With Project

Project Address: 18618 W OXNARD ST, 91356



Version 1.3

Analysis Results			
Total Employees: N/A			
Total Population: N/A			
Proposed Project		With Mitigation	
221	Daily Vehicle Trips	N/A	Daily Vehicle Trips
N/A	Daily VMT	N/A	Daily VMT
N/A	Household VMT per Capita	N/A	Household VMT per Capita
N/A	Work VMT per Employee	N/A	Work VMT per Employee
Significant VMT Impact?			
APC: South Valley			
Impact Threshold: 15% Below APC Average			
Household = 9.4			
Work = 11.6			
Proposed Project		With Mitigation	
VMT Threshold	Impact	VMT Threshold	Impact
Household > 9.4	N/A	Household > 9.4	N/A
Work > 11.6	N/A	Work > 11.6	N/A

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: July 6, 2021

Project Name: 18618 Oxnard Street Self-Storage

Project Scenario: With Project

Project Address: 18618 W OXNARD ST, 91356



Version 1.3

TDM Strategy Inputs				
Strategy Type	Description	Proposed Project	Mitigations	
Parking	<i>Reduce parking supply</i>	<i>City code parking provision (spaces)</i>	0	
		<i>Actual parking provision (spaces)</i>	0	
	<i>Unbundle parking</i>	<i>Monthly cost for parking (\$)</i>	\$0	\$0
	<i>Parking cash-out</i>	<i>Employees eligible (%)</i>	0%	0%
	<i>Price workplace parking</i>	<i>Daily parking charge (\$)</i>	\$0.00	\$0.00
		<i>Employees subject to priced parking (%)</i>	0%	0%
	<i>Residential area parking permits</i>	<i>Cost of annual permit (\$)</i>	\$0	\$0
(cont. on following page)				

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: July 6, 2021

Project Name: 18618 Oxnard Street Self-Storage

Project Scenario: With Project

Project Address: 18618 W OXNARD ST, 91356



Version 1.3

TDM Strategy Inputs, Cont.				
Strategy Type	Description	Proposed Project	Mitigations	
Transit	<i>Reduce transit headways</i>	<i>Reduction in headways (increase in frequency) (%)</i>	0%	
		<i>Existing transit mode share (as a percent of total daily trips) (%)</i>	0%	
		<i>Lines within project site improved (<50%, >=50%)</i>	0	
	<i>Implement neighborhood shuttle</i>	<i>Degree of implementation (low, medium, high)</i>	0	0
		<i>Employees and residents eligible (%)</i>	0%	0%
	<i>Transit subsidies</i>	<i>Employees and residents eligible (%)</i>	0%	0%
<i>Amount of transit subsidy per passenger (daily equivalent) (\$)</i>		\$0.00	\$0.00	
Education & Encouragement	<i>Voluntary travel behavior change program</i>	<i>Employees and residents participating (%)</i>	0%	
	<i>Promotions and marketing</i>	<i>Employees and residents participating (%)</i>	0%	
(cont. on following page)				

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: July 6, 2021

Project Name: 18618 Oxnard Street Self-Storage

Project Scenario: With Project

Project Address: 18618 W OXNARD ST, 91356



Version 1.3

TDM Strategy Inputs, Cont.				
Strategy Type	Description	Proposed Project	Mitigations	
Commuter Trip Reductions	<i>Required commute trip reduction program</i>	<i>Employees participating (%)</i>	0%	0%
	<i>Alternative Work Schedules and Telecommute</i>	<i>Employees participating (%)</i>	0%	0%
		<i>Type of program</i>	0	0
	<i>Employer sponsored vanpool or shuttle</i>	<i>Degree of implementation (low, medium, high)</i>	0	0
		<i>Employees eligible (%)</i>	0%	0%
		<i>Employer size (small, medium, large)</i>	0	0
<i>Ride-share program</i>	<i>Employees eligible (%)</i>	0%	0%	
Shared Mobility	<i>Car share</i>	<i>Car share project setting (Urban, Suburban, All Other)</i>	0	0
	<i>Bike share</i>	<i>Within 600 feet of existing bike share station - OR- implementing new bike share station (Yes/No)</i>	0	0
	<i>School carpool program</i>	<i>Level of implementation (Low, Medium, High)</i>	0	0
(cont. on following page)				

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: July 6, 2021

Project Name: 18618 Oxnard Street Self-Storage

Project Scenario: With Project

Project Address: 18618 W OXNARD ST, 91356



Version 1.3

TDM Strategy Inputs, Cont.				
Strategy Type	Description	Proposed Project	Mitigations	
Bicycle Infrastructure	<i>Implement/Improve on-street bicycle facility</i>	<i>Provide bicycle facility along site (Yes/No)</i>	0	0
	<i>Include Bike parking per LAMC</i>	<i>Meets City Bike Parking Code (Yes/No)</i>	0	0
	<i>Include secure bike parking and showers</i>	<i>Includes indoor bike parking/lockers, showers, & repair station (Yes/No)</i>	0	0
Neighborhood Enhancement	<i>Traffic calming improvements</i>	<i>Streets with traffic calming improvements (%)</i>	0%	0%
		<i>Intersections with traffic calming improvements (%)</i>	0%	0%
	<i>Pedestrian network improvements</i>	<i>Included (within project and connecting off-site/within project only)</i>	0	0

CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: July 6, 2021

Project Name: 18618 Oxnard Street Self-Storage

Project Scenario: With Project

Project Address: 18618 W OXNARD ST, 91356



Version 1.3

TDM Adjustments by Trip Purpose & Strategy

Place type: Compact Infill

		Home Based Work Production		Home Based Work Attraction		Home Based Other Production		Home Based Other Attraction		Non-Home Based Other Production		Non-Home Based Other Attraction		Source
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
		Parking	Reduce parking supply	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Unbundle parking	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Parking cash-out	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Price workplace parking	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Residential area parking permits	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Transit	Reduce transit headways	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Transit sections 1 - 3
	Implement neighborhood shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Transit subsidies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Education & Encouragement	Voluntary travel behavior change program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Education & Encouragement sections 1 - 2
	Promotions and marketing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Commute Trip Reductions	Required commute trip reduction program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Commute Trip Reductions sections 1 - 4
	Alternative Work Schedules and Telecommute Program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Employer sponsored vanpool or shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Ride-share program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Shared Mobility	Car-share	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	TDM Strategy Appendix, Shared Mobility sections 1 - 3
	Bike share	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
	School carpool program	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: July 6, 2021

Project Name: 18618 Oxnard Street Self-Storage

Project Scenario: With Project

Project Address: 18618 W OXNARD ST, 91356



Version 1.3

TDM Adjustments by Trip Purpose & Strategy, Cont.

Place type: Compact Infill

		Home Based Work Production		Home Based Work Attraction		Home Based Other Production		Home Based Other Attraction		Non-Home Based Other Production		Non-Home Based Other Attraction		Source
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
		Bicycle Infrastructure	Implement/ Improve on-street bicycle facility	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	Include Bike parking per LAMC	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	Include secure bike parking and showers	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Neighborhood Enhancement	Traffic calming improvements	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	TDM Strategy Appendix, Neighborhood Enhancement
	Pedestrian network improvements	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

Final Combined & Maximum TDM Effect

	Home Based Work Production		Home Based Work Attraction		Home Based Other Production		Home Based Other Attraction		Non-Home Based Other Production		Non-Home Based Other Attraction	
	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated
COMBINED TOTAL	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
MAX. TDM EFFECT	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

$$= \text{Minimum}(X\%, 1 - [(1-A) * (1-B)...])$$

where X%=

PLACE	urban	75%
TYPE	compact infill	40%
MAX:	suburban center	20%
	suburban	15%

NOTE: $(1 - [(1-A) * (1-B)...])$ reflects the dampened combined effectiveness of TDM Strategies (e.g., A, B,...). See the TDM Strategy Appendix (*Transportation Assessment Guidelines Attachment G*) for further discussion of dampening.

CITY OF LOS ANGELES VMT CALCULATOR

Report 4: MXD Methodology

Date: July 6, 2021

Project Name: 18618 Oxnard Street Self-Storage

Project Scenario: With Project

Project Address: 18618 W OXNARD ST, 91356



Version 1.3

MXD Methodology - Project Without TDM

	Unadjusted Trips	MXD Adjustment	MXD Trips	Average Trip Length	Unadjusted VMT	MXD VMT
Home Based Work Production	0	0.0%	0	N/A	N/A	N/A
Home Based Other Production	0	0.0%	0	N/A	N/A	N/A
Non-Home Based Other Production	52	-1.9%	51	N/A	N/A	N/A
Home-Based Work Attraction	49	-14.3%	42	N/A	N/A	N/A
Home-Based Other Attraction	105	-26.7%	77	N/A	N/A	N/A
Non-Home Based Other Attraction	52	-1.9%	51	N/A	N/A	N/A

MXD Methodology with TDM Measures

	<i>Proposed Project</i>			<i>Project with Mitigation Measures</i>		
	TDM Adjustment	Project Trips	Project VMT	TDM Adjustment	Mitigated Trips	Mitigated VMT
Home Based Work Production	N/A	N/A	N/A	N/A	N/A	N/A
Home Based Other Production	N/A	N/A	N/A	N/A	N/A	N/A
Non-Home Based Other Production	N/A	N/A	N/A	N/A	N/A	N/A
Home-Based Work Attraction	N/A	N/A	N/A	N/A	N/A	N/A
Home-Based Other Attraction	N/A	N/A	N/A	N/A	N/A	N/A
Non-Home Based Other Attraction	N/A	N/A	N/A	N/A	N/A	N/A

MXD VMT Methodology Per Capita & Per Employee

Total Population: N/A

Total Employees: N/A

APC: South Valley

	<i>Proposed Project</i>	<i>Project with Mitigation Measures</i>
<i>Total Home Based Production VMT</i>	N/A	N/A
<i>Total Home Based Work Attraction VMT</i>	N/A	N/A
<i>Total Home Based VMT Per Capita</i>	N/A	N/A
<i>Total Work Based VMT Per Employee</i>	N/A	N/A