

APPENDIX H

PROJECT VMT ANALYSIS

MEMORANDUM

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Subject: Alondra Apartments Project – CEQA VMT Analysis

The memorandum documents Vehicle Miles Traveled (VMT) Analysis for the proposed Alondra Apartments Project in the City of Norwalk.

Project Description

The project site is approximately 8.06 acres and is located on the southeast corner of Maidstone Avenue and Alondra Boulevard in the City of Norwalk. The project site was formerly the Norwalk Indoor Swap Meet, which has been demolished, leaving the foundation and surface improvements. Currently, the site is being used as an interim container storage area. The project applicant proposes to develop the project site as mixed-use to accommodate 209 multi-family dwelling units. Included are ground floor mixed-use units along Alondra Boulevard, accommodating approximately 3,056 square feet (SF) designated for commercial users that provide service-type uses. Exhibit 1 in the attachment shows the project location.

Senate Bill 743 (SB 743)

SB 743, approved in 2013, mandated a change in the way transportation impacts are determined according to the California Environmental Quality Act (CEQA). The Governor's Office of Planning and Research (OPR) has directed the use of VMT as the replacement for automobile delay-based LOS for the purposes of determining a significant transportation impact under CEQA. As of December 2018, the Natural Resources Agency finalized updates to CEQA Guidelines to incorporate SB 743 (i.e., VMT). To assist in the implementation of VMT as the primary measure of a transportation impact under CEQA, the OPR published an updated Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018. Statewide application of the new guidelines went into effect on July 1, 2020.

The OPR's Technical Advisory guidelines include the following main components for assessment of development projects.

- Analysis Methodologies – Identification of potential thresholds that can be considered when establishing thresholds of significance for VMT assessment and recommendations of analysis methodologies for VMT impact screening and analysis
- Mitigation Memorandum – Types of mitigation that can be considered for VMT mitigation

The City of Norwalk has not adopted a methodology and significance threshold for use in CEQA compliance, therefore the VMT analysis for this Project was based on the Los Angeles County Transportation Impact Analysis guidelines as well as OPR guidelines.

VMT Screening

The City of Norwalk is in the process of adopting new Transportation Impact Guidelines and now relies on VMT as the measure for determining a project significant transportation impact under the CEQA process.

This technical memorandum was prepared to document the VMT analysis for the proposed Project following the OPR Technical Advisory Guidelines. The OPR guidelines provide details on appropriate screening thresholds that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed level analysis. Screening criteria are broken down into the following criteria:

1. Transit Priority Areas (TPA) Screening

As described in the OPR Guidelines, projects located within a half-mile from an existing major transit stop (transit stops with headways of 15-minutes or less) or within a half-mile of an existing stop along a high-quality transit corridor (corridors with buses arriving at most every 15-minutes) can be presumed to have a less than significant impact, absent substantial evidence to the contrary. This assumption requires that projects satisfy the following criteria:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City), with input from the Metropolitan Planning Organization);
- Replaces affordable residential units with a smaller number of moderate-or high income residential units.

The Project site is served by public transit provided by Los Angeles County Metropolitan Transportation Authority (Metro) and Norwalk Transit. Bus stops located at Alondra Boulevard and Maidstone Avenue serve the project with Metro Line 128 (operates from 6:00 AM to 9:00 PM with 30-minute headways) and Norwalk Transit Line 1 (operates from 5:30 AM to 10:15 PM with approximately 30-minute headways). Both the lines operate along Alondra Boulevard within the project vicinity. As noted previously bus routes operate with 30-minute headways during the peak commute periods. The bus stops for these routes are located within a half-mile of the Project site.

Therefore, based on the information provided above, the project does not meet any of the exclusionary criteria that would disqualify it from a less than significance assumption based on TPA screening. However, given the definition of high-quality transit stops and corridors required to have headways of 15 minutes or less during the peak commute periods as required by OPR, the Project cannot be presumed to result in a less than significant impact based on TPA screening.

2. Low VMT-Generation Area Screening

Projects generating VMT below 15% below regional average can be screened out. For the purpose of this analysis, Los Angeles County was selected as the regional average VMT screening. For a mixed-used

project, all components of the project should be analyzed against the low VMT maps for either the dominant project land use (if applicable) or for each individual land use (if there is no dominant project land use). Reductions in VMT may be applied to account for internal trips that would occur within the project site. Based on the base year SCAG model VMT results, the residential component is not below 15% of the regional VMT per Capita. Therefore, the project is not screened out based on the low VMT-Generation Area screening.

3. Project Type Screening

Some project types have been identified in the OPR guidelines as having the presumption of a less than significant impact. The following uses can be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are local serving in nature:

- Local-serving retail uses less than 50,000 square feet
- Other local-serving uses as approved by the City Staff
- Projects generating less than 110 daily vehicle trips

Based on the VMT screening criteria noted above, the retail portion of the project would be screened out of further VMT analysis. However, the residential portion of the project would not be screened out; therefore, a VMT analysis would be required for the residential portion of the project.

A land use project needs only meet one of the above screening thresholds to be presumed to result in not significant impact under CEQA pursuant to SB 743. As mentioned above, the Project is considered to have not met any of the criteria that would qualify it to be non-significant for the residential component and therefore a complete VMT analysis was conducted to further analyze the VMT impacts.

VMT Thresholds

The OPR recommends the following VMT significance criteria.

Project VMT Impacts

A residential project would result in a significant project generated VMT impact if the following conditions are satisfied.

- The baseline project generated Home-Based VMT per capita exceeds the 15% below the regional baseline Home-Based VMT per capita for residential projects

As mentioned earlier, the retail component of the Project meets the initial screening criteria, but the residential component is not screened out. Therefore, a VMT analysis has been conducted for the Project according to the OPR guidelines.

VMT Analysis

The OPR guidance related to SB 743 is a helpful introduction to using VMT to evaluate projects. OPR has established that a broad range of analysis tools may be acceptable for the purposes of VMT analysis including:

Travel demand models, sketch models, spreadsheet models, research, and data can all be used to calculate and estimate VMT. To the extent possible, lead agencies should choose models that have sensitivity to features of the project that affect VMT. Those tools and resources can also assist in

establishing thresholds of significance and estimating VMT reduction attributable to mitigation measures and project alternatives. When using models and tools for those various purposes, agencies should use comparable data and methods, in order to set up an “apples-to-apples” comparison between thresholds, VMT estimates, and VMT mitigation estimates¹.

For mixed-use projects, OPR recommends analyzing each component individually or focus on the predominant land use. For the purpose of this analysis, the residential component is analyzed. A logical way to evaluate this type of land use is to consider different trip purposes of the project. The following discussion is provided regarding the home-based trip types.

Home-Based trips. These are the primary automobile trips associated with residential uses such as the proposed project. The residential use is expected to generate several trips related to work, shopping, school, etc. in the region. The efficiency of VMT associated with home-based trips has been assessed based on the Big Data platform Replica.

Kimley-Horn developed VMT efficiency matrices using Replica Big Data platform for the Project as well as for Los Angeles County. Replica provides travel and demographic data similar to a travel demand model with various trip attributes such as trip mode, trip purpose, trip distance, origin, and destination. Replica provides trip data for the year 2019 using different data points including cell phone data. Vehicle trips by purpose and trip distances for Los Angeles County and surrounding areas were compiled at the blockgroup level from the Replica Big Data platform. Population data from the Census Bureau's American Community Survey (ACS) was compiled for the year 2019 as well. VMT per Capita for Los Angeles County as well as for the Project area separately was calculated at the blockgroup level, using the existing big data trips, trip purpose, trip distance and population. The Project area VMT was compared against the threshold considered for this Project to assess potential significant VMT impacts.

Potential Impacts

VMT results for the projects based on the Big Data are summarized in **Table 1**.

Table 1 – Project VMT per Capita – Big Data Model

Efficiency Metric	Existing LA County Average VMT	VMT Threshold	Project Area VMT	Potentially Significant
Residential VMT per Capita	13.9	11.9 (85%)	13.3	Yes

As shown in **Table 1**, the project’s VMT per Capita would not meet the 15% below regional average threshold. The project’s transportation impact is potentially significant based on the OPR recommended thresholds.

VMT Mitigation

If a significant transportation impact is identified, feasible mitigation measures to avoid or reduce the impact must be identified. To mitigate the Project’s VMT impact below the regional threshold of 11.9, the Project must reduce its VMT per Capita by 10.5-percent. This reduction would result in reducing the project’s 13.3 VMT per Capita below the threshold of 11.9 VMT per Capita.

¹OPR Guidelines, page 30

OPR provides a list of potential measures to reduce VMT but gives the lead agency full discretion in the selection of mitigation measures. CAPCOA's most recent version of its VMT mitigation Handbook, *Handbook for analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*², contains provides various GHG and VMT mitigation measures and includes methodology to estimate reduction in VMT associated with each measure.

As noted in the CAPCOA Handbook, mitigation measure T-15 is Limit Residential Parking Supply which can yield up to a 13.7-percent reduction in VMT depending on the amount of parking that is reduced. The required residential parking for the Project is 497 spaces (does not include retail parking for the mixed-use units). If these parking spaces are reduced to 397 spaces, the measure can yield a 2.8-percent VMT reduction.

A second mitigation measure, which can be combined with the T-15, is Unbundle Residential Parking Costs (T-16). This measure will separate the Project's residential parking costs from property costs, requiring those who wish to purchase parking spaces to do so at an additional cost. Based on the methodology described in the CAPCOA Handbook and discussions with City staff and developer, implementing this measure will yield a 5.2-percent VMT reduction.

Other mitigation measures suggested in the CAPCOA Handbook were also considered. Mitigation measure T-7 is Implement Commute Trip Reduction Marketing, which is based on a program for employers but could be applied to the residents as well since the multifamily units will be a part of a homeowner's association. This measure is to implement a marketing strategy to promote the project site's trip reductions. The measure involves information sharing and marketing to promote and educate residents about their travel choices to their employment location and other destination beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. Implementing this measure will yield up to a 4-percent VMT reduction

Combining the above-mentioned mitigation measures would reduce the Project VMT per capita by up to 12-percent, which is more than the required 10.5-percent reduction and thereby results in a less than significant VMT impact for the proposed Project.

Findings

Based on the results of this analysis, the following findings are made:

- Based on the VMT calculation methodology described herein, the regional average VMT per capita for residential projects is 13.9. Therefore, the threshold of significance for new residential project development is 15-percent below the regional average, or 11.9 VMT per capita.
- The proposed project is anticipated to result an average VMT per capita of 13.3. The project would need to reduce VMT per capita by 10.5-percent to be below the regional threshold.
- The implementation of the mitigation measures related to parking supply, parking costs and trip reduction marketing is estimated to result in a VMT reduction of 10.5-percent.

Considering these feasible mitigation measures, the Project is expected to not have a significant VMT impact with mitigation.

² *Handbook for analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*. California Air Pollution Control Officers Association (CAPCOA). January 2022.

Exhibit 1: Project Location

