

Appendix N

Vehicle Miles Traveled

MEMORANDUM

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Subject: South El Monte Athletic Fields and Business Park Project– CEQA VMT Analysis

This memorandum documents the Vehicle Miles Traveled (VMT) Analysis conducted for the proposed South El Monte Athletic Fields and Business Park Project (Project) in the City of South El Monte.

Project Description

The Project would construct a 221,815 square-foot warehouse building on approximately 10.2 acres of the Project site and dedicate approximately 10.9 acres of the Project site to the City for the future development of a park. The Project site would be located on one approximately 21.1 acre parcel (APN 8119-005-032) in the City of South El Monte, California. The Project site would encompass one approximately 21-acre parcel with the warehouse component proposed on the southeast portion of the site and the future park component on the northwest portion of the site.

Access to the warehouse would be provided via two, passenger car and truck, full access unsignalized driveways along Lexington-Gallatin Road and includes 277 automobile parking spaces. Access to the future park component would be provided via full access and unsignalized driveway along Santa Anita Avenue. The site is generally bordered by Santa Anita Avenue to the north and west, Lexington-Gallatin Road to the south, and an undeveloped parcel used for truck storage and the Pomona Freeway (SR-60) to the east. This transportation study analyzes the effects of both the proposed warehouse and the potential effects associated with the future development of a park on the surrounding transportation network. **Figure 1** illustrates the location of the project site in relation to the adjacent roadway network, **Figure 2** illustrates the proposed Conceptual site plan.

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.

Figure 1 – Project Location

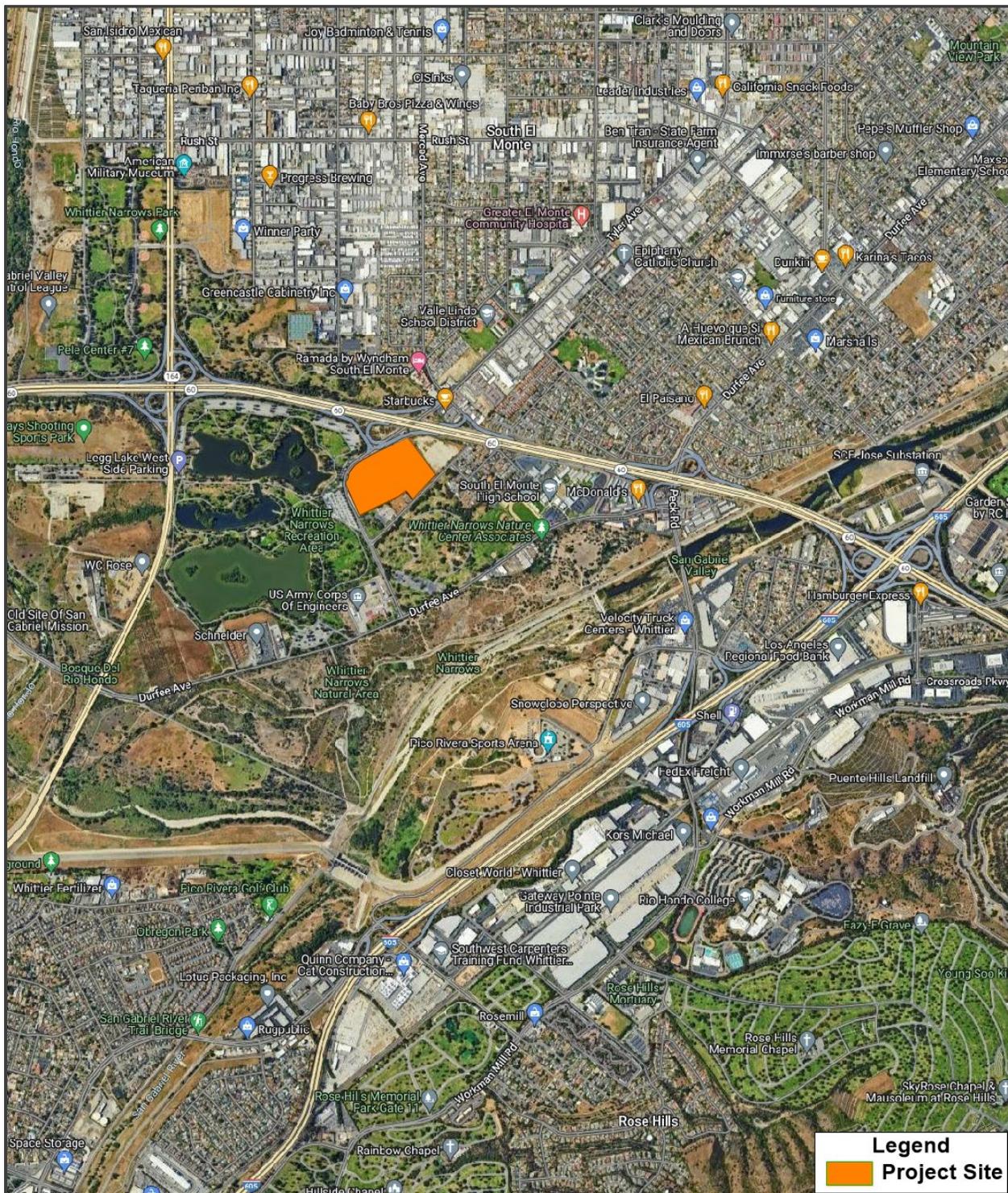
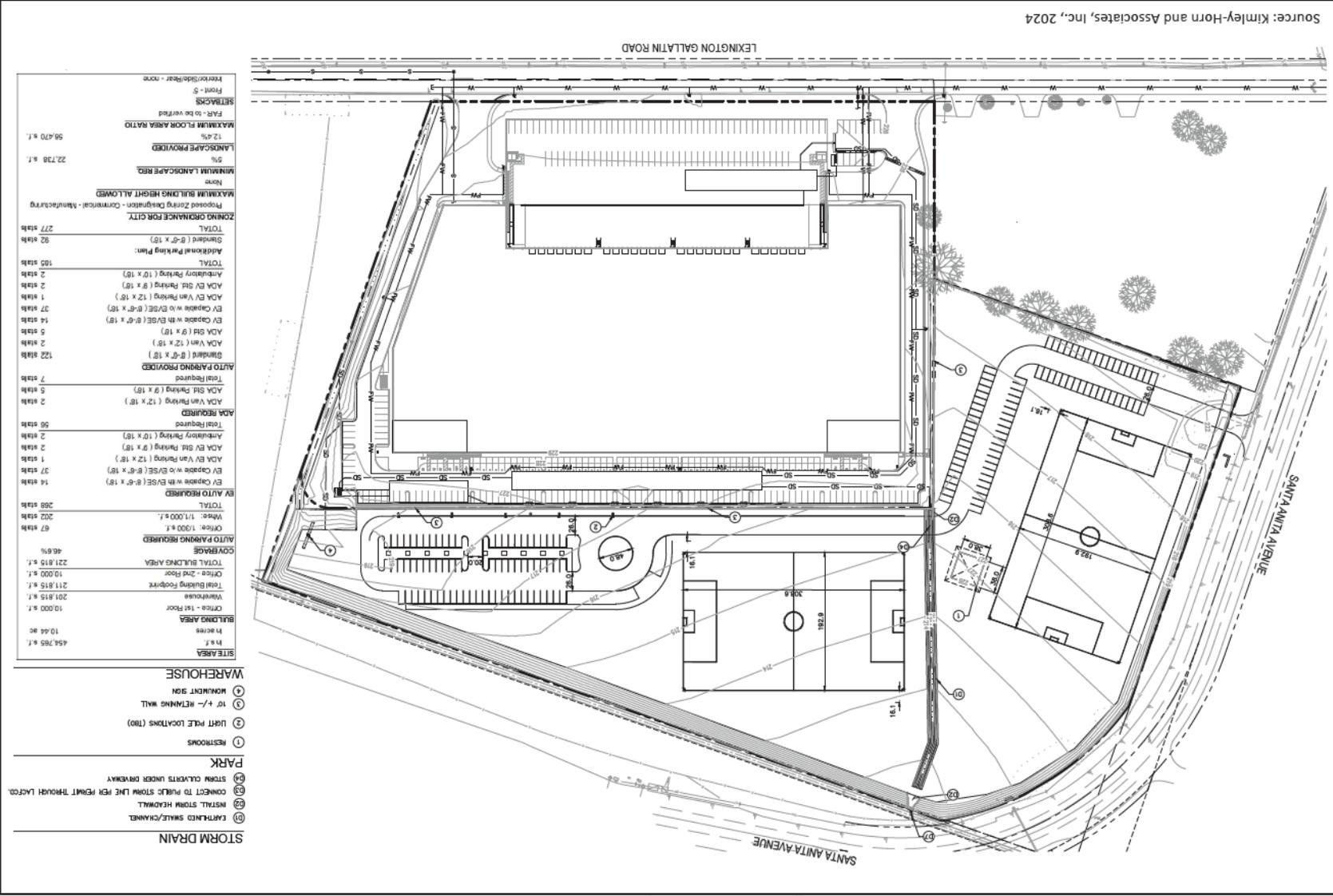


Figure 2 – Conceptual Site Plan



Source: Kimley-Horn and Associates, Inc., 2024

In anticipation of the change to VMT, the San Gabriel Valley Council of Governments (SGVCOG) undertook the SGVCOG SB 743 Implementation Study to assist with answering important implementation questions about the methodology, thresholds, and mitigation approaches for VMT impact analysis in its member agencies. The study includes the following main components.

- 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
- VMT Assessment Tool – A web-based tool that can be used for VMT screening and mitigation recommendation

The City of South El Monte utilized the information produced through the Implementation Study to adopt a methodology and significance thresholds for use in CEQA compliance. Consistent to the implantation study, the City recommends utilizing the Southern California Association of Government (SCAG) Travel Demand Model as its methodology to measure VMT.

VMT Thresholds

The City of South El Monte has adopted the following VMT significance criteria.

Project Generated VMT Impacts

Based on the City guidelines, a project would result in a significant project generated VMT impact if either of the following conditions are satisfied.

- The baseline project generated VMT per capita exceeds the 15% below the SGVCOG baseline VMT per service population
- The cumulative project generated VMT per capita exceeds the 15% below the SGVCOG baseline VMT per service population

The above threshold criteria are intended for three primary land uses – Residential, Office and Industrial. The proposed Project includes a warehouse land use which typically generates regional truck trips along with commute trips, which can be categorized as regional-serving. Considering the Project land use, the **net increase in total VMT** was used to evaluate Project Generated VMT impacts for this Project. The study area for the net increase was determined to be Los Angeles County.

Project's Effect On VMT

The Project's effect on VMT would be considered significant if it resulted in the following condition being satisfied:

- The cumulative link-level boundary Citywide VMT per service population increases under the plus Project condition compared to the no Project condition.

Initial VMT Screening

This section documents Vehicle Miles Traveled (VMT)/ SB 743 considerations for the Project. The City Guidelines provides 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 thresholds are broken into the following three steps:

1. Transit Priority Areas (TPA) Screening

As described in the City Guidelines, projects located within half mile from an existing major transit stop or within half of a mile from an existing stop along a high-quality transit corridor can be screened out. The Project site is served by public transit provided by Foothill Transit. Line 269 is a north-south fixed-route bus service that operates from the El Monte Station to The Shops at Montebello. On weekdays, Line 269 operates between 5:55 AM and 10:19 PM on 30-60-minute headways. On weekends, Line 269 operates between 6:30 AM and 8:27 PM on 60-minute headways. The nearest bus stop is at the intersection of Lexington-Gallatin Road and Santa Anita Avenue, which is located approximately 600 feet to the west of the Project Site.

Based on the City Guidelines, the Project may be presumed to have a less than significant impact absent substantial evidence to the contrary. The City Guidelines state that this presumption may NOT be appropriate if the project:

- 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 lead agency, with input from the Southern California Association of Governments (SCAG));
- Replaces affordable residential units with a smaller number of moderate-or high-income residential units.

Project does not meet any of the criteria that would disqualify it from TPA. Therefore, the Project is not screening out based on TPA screening.

2. Low VMT-Generation Area Screening

Projects that can reasonably be expected to generate VMT per service population that is similar to the existing land use in a low VMT area can qualify for the Low VMT Area Screening. Proposed Project is "screened out" if located within low VMT area of 'Total VMT per Service Population' below the City's adopted VMT threshold. Based on the SGVCOG online VMT tool, the Project is not below 15% of the regional daily Total VMT per service population. 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 City 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

Since both the land use components of the Project are expected to generate more than 110 daily vehicle trips, the Project is not screening out initially based on Project Type screening. However, the future park component of the Project can be categorized as local-serving use and therefore can be screened out based on the Project Type screening.

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

VMT Analysis

Total Regional VMT

As mentioned earlier, the net change in Countywide VMT was used to determine the VMT impacts of the proposed warehouse land use. Warehouse uses can be categorized as regional-serving uses in that they primarily serve pre-existing needs (i.e., they do not generate new trips so much as meet demand) especially when they are located near a freeway exit/entry. Because of this, most often they can be presumed to reduce trip lengths when a new facility is introduced strategically based on its geographic location. The net change in regional VMT due to the proposed Project was assessed based on the SCAG Travel Demand Model consistent with the City’s draft guidelines. The VMT calculations considered all vehicle trip types in the model – passenger vehicle and trucks.

The SCAG model used for this analysis was developed as part of the Regional Transportation Plan (RTP) 2016 which was also used for the SGVCOG SB 743 Implementation Study. The SCAG model is a trip-based model and considers interaction between different land uses based on socio-economic data such as population, households and employment. Adjustments in socio-economic data (households, population and employment) were made to the appropriate traffic analysis zone (TAZ) within the SCAG model to reflect the Project’s proposed land use. **Table 1** shows the Project employment numbers added to the appropriate Project TAZ in the SCAG model.

Table 1 – SCAG Model Project Socio-Economic Data

TAZ (Tier 2)	Additional Employment
TAZ # 22197100	235

The calculation of vehicle miles traveled has two components – the total number of vehicle trips generated and the average trip length of each vehicle trip. Both trip origins and destinations were used from all vehicle trip matrices in the SCAG model. Using the vehicle trip matrices from all time periods in the model and skim (distances) matrices, VMT was calculated for all traffic analysis zones (TAZ) within the County.

Table 2 and **3** shows the total VMT in Los Angeles County for the With and Without Project conditions, and resultant net change in VMT for both the existing and cumulative conditions. As shown in the tables the proposed Project will result in a net reduction of total VMT in the County under both the existing and cumulative conditions.

Table 2 – Existing Conditions Project VMT Impact Evaluation

Region	Existing With Project	Existing Without Project	Net Change in VMT	Net % Change in VMT
Los Angeles County	438,615,903	450,979,123	-12,363,220	-2.7%

Note: Total VMT is calculated based on the Base Year 2012 SCAG model runs.

Table 3 – Cumulative Conditions Project VMT Impact Evaluation

Region	Cumulative With Project	Cumulative Without Project	Net Change in VMT	Net % Change in VMT
Los Angeles County	519,134,142	519,223,681	-89,538	-0.02%

Note: Total VMT is calculated based on the Future Year 2040 SCAG model runs.

Project Effect on VMT

Consistent with the City’s Guidelines, the Project’s effect on VMT was also evaluated using the boundary method for the cumulative conditions. The boundary method is the total daily VMT within a specific area calculated by multiplying the daily vehicle traffic volume on all the roadway segment by the length of each of the roadway segment within that specific study area. This approach includes all trips, including those trips that do not begin or end in the designated boundary.

To determine the appropriate boundary for the Project, the average trip length for the Project TAZ was derived from the vehicle trip matrices and distance matrices. It was determined that the 16-mile radius from the Project TAZ would be the appropriate area for the boundary method to capture most of the trips coming from and to the project site. The VMT impact is determined by normalizing the boundary VMT by the service population (residents + employees) and comparing the results between the With Project and the Without Project conditions.

Table 4 shows the Cumulative Year (2040) Boundary method VMT for the 16-mile Boundary. As shown in the table, the Boundary VMT per service population (15.27) remains the same for With and Without Project conditions in the future.

Table 4 – Cumulative Conditions Project VMT Impact Evaluation

VMT Metric	Cumulative With Project	Cumulative Without Project
16-Mile Boundary VMT	138,137,562	138,136,036
16-Mile Service Population	9,046,420	9,046,185
16-Mile Boundary VMT /Service Population	15.27	15.27

Conclusion

The Project’s transportation impact based on the quantitative VMT analysis is non-significant based on City of South El Monte and OPR’s recommended thresholds.