

**APPENDIX 13**

May 31, 2022

Mr. Tom Dodson  
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PO Box 2307  
San Bernardino, CA 92406-2307

**SUBJECT: WHITTIER RESIDENTIAL VEHICLE MILES TRAVELLED (VMT) SCREENING  
EVALUATION AND TRIP GENERATION ASSESSMENT**

Dear Mr. Tom Dodson:

The following Vehicle Miles Travelled (VMT) Screening Evaluation and Trip Generation Assessment has been prepared for the proposed Whittier Residential development (**Project**), which the project site is located at 12826 Philadelphia Street in the City of Whittier. The purpose of this work effort is to determine whether additional VMT and traffic analyses are necessary for the proposed Project.

**PROJECT OVERVIEW**

It is our understanding that the project is to consist of a 52-unit multifamily residential project. The site is located within the Uptown Center of the Uptown Whittier Specific Plan.

**BACKGROUND**

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December of 2018) (**Technical Advisory**). (1) Based on OPR's Technical Advisory, the City of Whittier adopted its City of Whittier Transportation Study Guidelines (October 2021) (**City Guidelines**) (2), which documents the City's VMT analysis methodology and approved impact thresholds. The VMT screening evaluation and trip generation assessment presented in this report has been developed based on the adopted City Guidelines.

**PROJECT SCREENING**

The City Guidelines provide details on appropriate screening criteria and 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 analysis. Screening thresholds are broken into the following six types:

- Project Size
- Locally Serving Retail

- Projects Located in a Low VMT Area
- Transit Proximity
- Transportation Facilities
- Affordable Housing

A land use project need only to meet one of the above screening thresholds to result in a less than significant VMT impact.

**PROJECT SIZE SCREENING**

The City Guidelines indicate that projects generating fewer than 110 daily vehicle trips may be presumed to have a less than significant impact.

**TRIP GENERATION**

The Project is proposing to develop 52 multifamily residential dwelling units. Table 1 presents the trip generation rates obtained from the latest Institute of Transportation Engineers (ITE) Trip Generation Manual (11<sup>th</sup> Edition, 2021) (3) for the proposed use. The resulting trip generation for the proposed Project is also shown on Table 1. As shown in Table 1, the proposed Project is anticipated to generate 236 two-way trips per day with 19 AM peak hour trips and 20 PM peak hour trips.

**TABLE 1: PROPOSED PROJECT TRIP GENERATION SUMMARY**

Land Use <sup>1</sup>	ITE Code	Units <sup>2</sup>	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Multifamily (Mid-Rise) Residential	221	DU	0.09	0.28	0.37	0.24	0.15	0.39	4.54

<sup>1</sup> Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

<sup>2</sup> DU = Dwelling Units

Land Use	Quantity Units <sup>1</sup>	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Multifamily (Mid-Rise) Residential	52 DU	4	15	19	12	8	20	236

<sup>1</sup> DU = Dwelling Units

The City’s Guidelines indicates that a localized transportation assessment must be prepared by a registered Civil or Traffic Engineer, or other qualified transportation professional. The localized transportation assessment is generally required if a project generates over 100 peak hour trips. As the proposed Project is anticipated to generate fewer than 100 peak hour trips in the AM and PM peak hours (with no more than 20 peak hour trips in the PM peak hour), additional peak hour traffic operations analysis is not necessary based on the City’s Guidelines. However, for the purposes of VMT screening, the Project exceeds the 110 daily vehicle trips threshold.

**Project Size screening criteria is not met.**

### **LOCALLY SERVING RETAIL SCREENING**

The City Guidelines identify that local serving retail less than 50,000 square feet or other local serving essential services (e.g., local parks, day care centers, public schools, medical/dental office buildings, etc.) are presumed to have a less than significant impact absent substantial evidence to the contrary. The Project does not propose to develop any locally serving retail.

### **PROJECT LOCATED IN A LOW VMT AREA SCREENING**

As noted in the City Guidelines, a residential or office project that is located in a Traffic Analysis Zone (TAZ) that is already 15% below the City and Sphere of Influence (SOI) Baseline VMT will tend to exhibit similarly low VMT. The City Guidelines provides a map of the City of Whittier+ SOI to locate areas of low VMT. As shown in attachment A, the Project Site is located in an area 15% below the City average daily home-based VMT per capita.

**Low VMT Area screening criteria is met.**

### **TRANSIT PROXIMITY**

Consistent with guidance identified City Guidelines, Projects that are located within a ½ mile of the Eastside Transit Corridor Phase 2 Project, or a ½ mile of where two or more 15-minute (during commute hours) bus routes intersect or within a ½ mile of a corridor served by 15-minute (during commute hours) bus service. In addition, the project should have the following characteristics:

- A Floor Area Ratio (FAR) of 0.75 or greater
- Is consistent with the applicable SCAG Sustainable Community Strategy (SCS) (as determined by the City)
- Does not provide more parking than required by the City
- Does not replace affordable housing units

The Project's location is presented in Attachment B, which shows existing and planned future TPA areas for both bus and rail service within the City. The Project site is located within a TPA based on bus service. However, further examination shows that the Montebello Bus Lines have reduced the frequency of service above 15-minute service intervals during commute hours and the City of Whittier no longer has any transit eligible areas for screening purposes.

**Transit Proximity screening criteria is not met.**

### **AFFORDABLE HOUSING**

City Guidelines state that residential projects that provide affordable housing units; if part of a larger development, the affordable housing units only satisfy the screening criteria. The Project does not intend to include any affordable housing units.

**Affordable Housing screening criteria is not met.**

**TRANSPORTATION FACILITIES**

The City Guidelines identify Transportation projects that promote non-auto travel, improve safety, or improve traffic operations at current bottlenecks, such as transit, bicycle and pedestrian facilities, intersection traffic control (e.g., traffic signals or roundabouts), or widening at intersections to provide new turn lanes. The Project will not be developing a transportation project.

**Transportation Facilities screening criteria is not met.**

**CONCLUSION**

Based on our review of applicable VMT screening criteria, the Project meets the Low VMT Area screening criteria and would therefore be presumed to result in a less than significant VMT impact; no additional VMT analysis is required. The localized transportation assessment is generally required if a project generates over 100 peak hour trips. As the proposed Project is anticipated to generate fewer than 100 peak hour trips in the AM and PM peak hours (with no more than 20 peak hour trips in the PM peak hour), additional peak hour traffic operations analysis is not necessary based on the City’s Guidelines.

If you have any questions, please contact me directly at [cso@urbanxroads.com](mailto:cso@urbanxroads.com).

Respectfully submitted,

URBAN CROSSROADS, INC.



Alex So  
Senior Associate



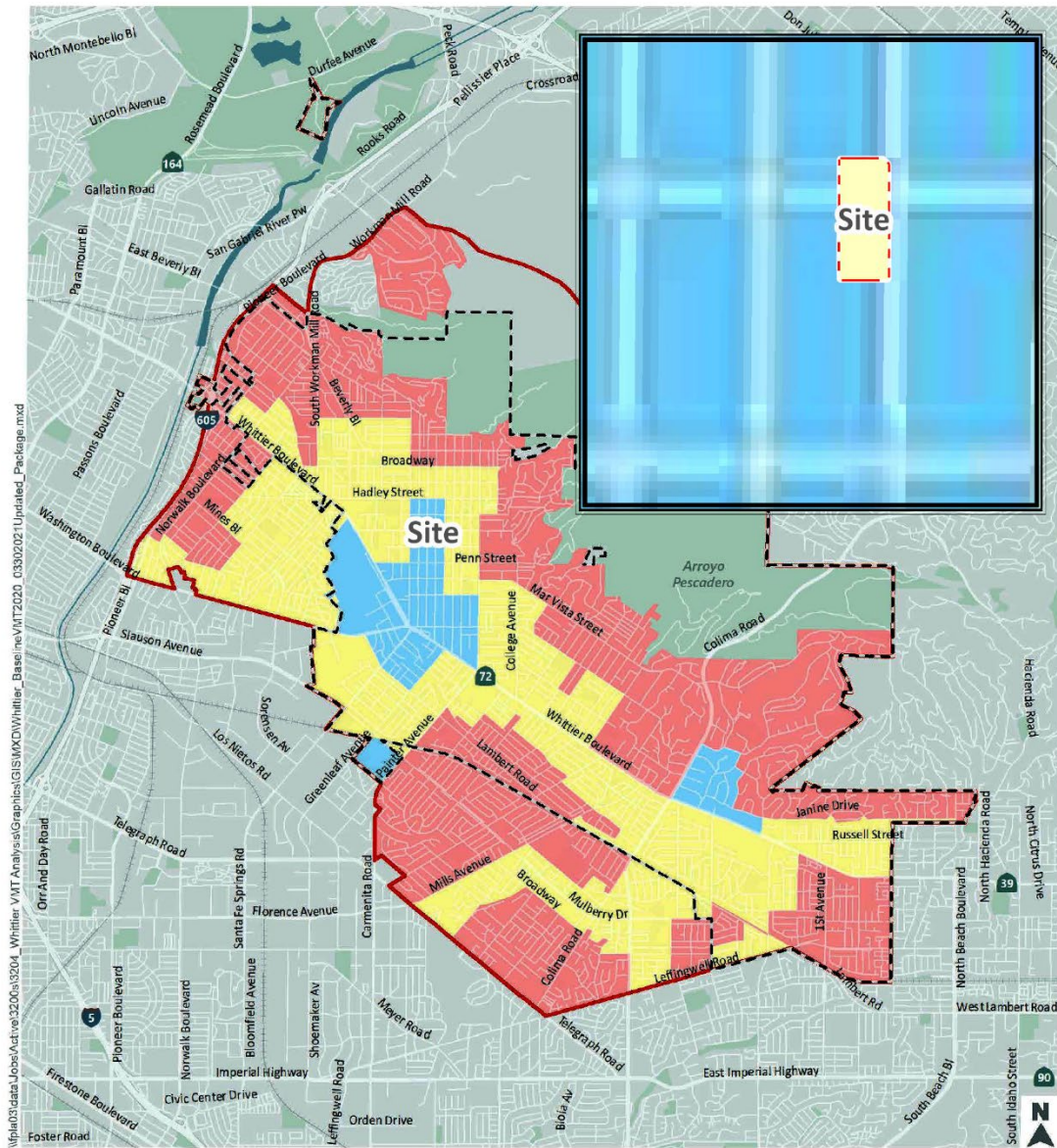
Charlene So, PE  
Principal

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Tom Dodson & Associates  
May 31, 2022  
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## REFERENCES

1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
2. **City of Whittier.** *City of Whittier Transportation Study Guidelines.* October 2021.
3. **Institute of Transportation Engineers.** *Trip Generation Manual.* 11th Edition. 2021.

**ATTACHMENT A**  
**CITY OF WHITTIER LOW VMT AREA MAP**



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Note: SCAG model with Whittier General Plan land use was used to estimate the Baseline VMT metrics.

- < -15% below City Average
- 0 to -15% below City Average
- Higher than City Average
- City of Whittier
- Sphere of Influence

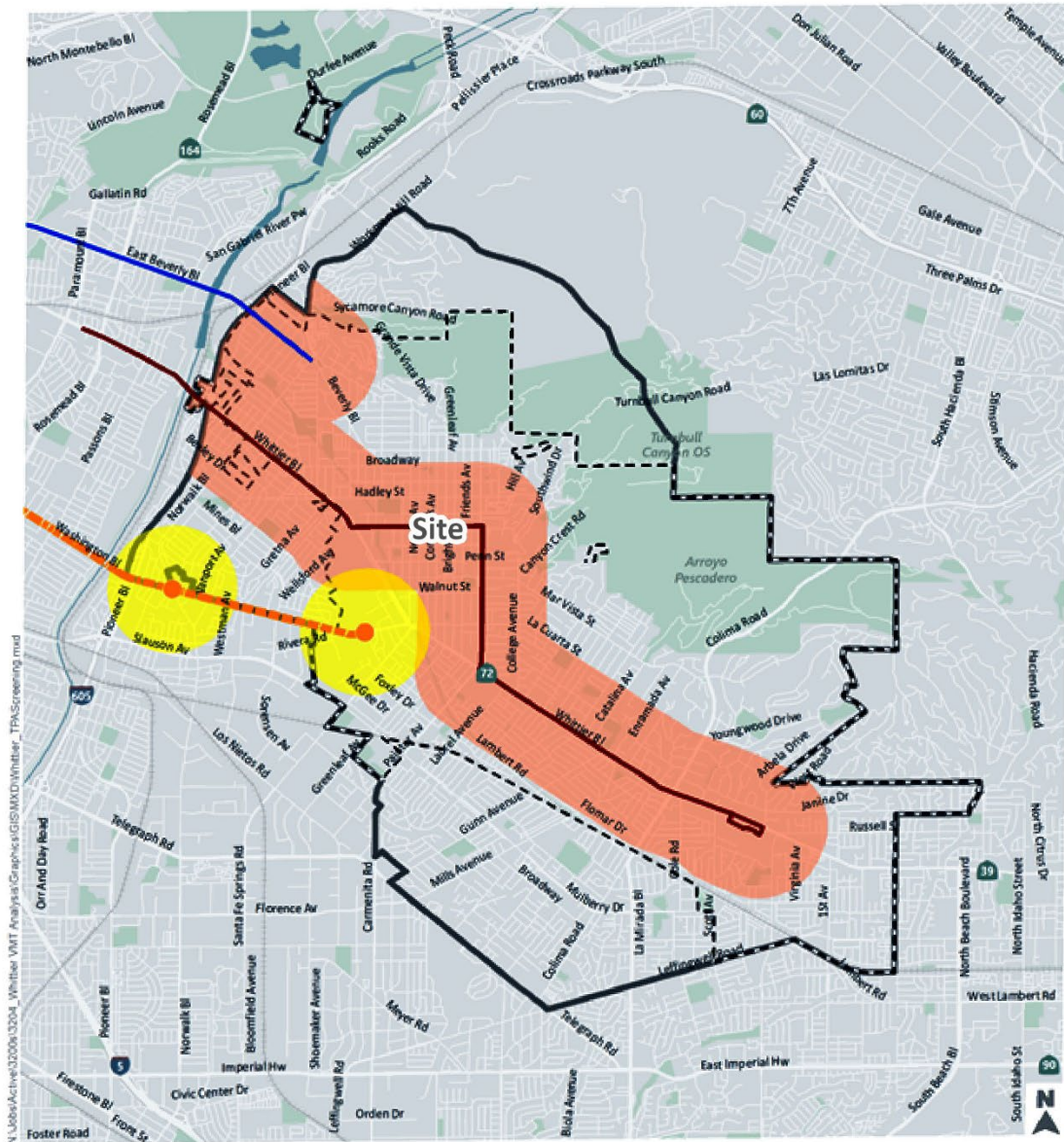
Figure 4



### Daily Home-Based VMT per Capita (2020)



**ATTACHMENT B**  
**CITY OF WHITTIER TPA MAP**



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- TPA Based on Bus Routes
- TPA Based on Metro L Line (Gold) Extension
- Metro L Line (Gold) Extension
- Metro Gold Line Stations
- Montebello Route 10
- Montebello Route 40
- City of Whittier
- Sphere of Influence

Figure 2

**Future Transit Priority Areas in Whittier  
(With Eastside Transit Corridor Phase 2 Built Out)**

