

January 12, 2023

Job No. IPGIM68H-0001

MEMORANDUM

To: Craig J. Wilde
IPG Mojave 68 Holdings LLC
991 Lomas Santa Fe Drive, Suite C PMB 469
Solana Beach, CA 92075

From: James M. Daisa, PE
Senior Transportation Project Manager



RE: REVISED SCOPING AGREEMENT FOR FOCUSED TRAFFIC IMPACT ANALYSIS AND VEHICLE MILES TRAVELED (VMT) SCREENING FOR PROPOSED INDUSTRIAL WAREHOUSE SITE LOCATED AT THE NORTHEAST CORNER OF MOJAVE DRIVE AND MESA LINDA AVENUE IN VICTORVILLE (APNS: 3128-621-02 THRU 06)

This memorandum presents key elements of the scope of work for the Focused Traffic Impact Analysis Report (TIA Report) evaluating the above referenced development project. This memorandum, a standard practice for the City of Victorville, presents our traffic study assumptions and methodologies to the City of Victorville for their review and approval. We estimate the proposed project's trip generation and distribute the trips to the project's site access points and proposed study intersections. This is key information the city needs to review and approve before we can proceed with the traffic study. This "revised" version of the scoping agreement has incorporated the city's comments received on the September 26, 2022, version.

In addition to establishing the scope of the focused traffic study, this memorandum includes a screening assessment to determine if a VMT analysis for CEQA clearance of the project is required. The screening assessment is based on Victorville's adopted criteria for exempting development projects from having to conduct a VMT analysis. The September 26, 2022, version of the scoping agreement concluded that the proposed project required a VMT analysis. The VMT was prepared and is included in the exhibits with this scope.

A. Project Description

The project site is located on the northeast corner of the intersection of Mojave Drive and Mesa Linda Avenue in the City of Victorville, as illustrated in **Exhibit A**. The proposed project is to construct an 1,097,300 square foot (SF) warehouse building with internal office space. The warehouse building will include an 877,800 SF of high-cube transload warehouse and 219,500 SF of high-cube cold storage warehouse with loading docks lining the east side and west side of the building. The proposed project is bounded to the north, east, and west by vacant/undeveloped properties, to the south by Mojave Drive and single-family residential development.

Exhibit B illustrates the proposed site plan. Access to the site is proposed from a main driveway on Mojave Drive, and additional driveways on Onyx Road, Mesa Linda Avenue, and Cactus Road.

B. Project Trip Generation

Table A summarizes the estimated trip generation of the proposed project for an average weekday, and weekday peak hours within the AM (7-9 AM) and PM (4-6 PM) peak periods. The Institute of Transportation Engineers (ITE) Trip Generation manual, 11th Edition is the source of the trip generation rates for High-Cube Transload Warehouse (Land Use Category 154) and High-Cube Cold Storage Warehouse (Land Use Category 157) trips per 1,000 square feet of gross floor area for the Peak Hour of the Adjacent Street Traffic (between 7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM). The split between warehouse and cold storage warehouse was identified by the developer as 80% warehouse and 20% cold storage warehouse.

Table A: Project Trip Generation

Use		Gross Floor Area (KSF)	Daily	AM Peak Hour of Adjacent Street Traffic			PM Peak Hour of Adjacent Street Traffic		
				In	Out	Total	In	Out	Total
1	High Cube Transload Warehouse (Comprises 80% of Building) (ITE Land Use Category 154)	877.8	Vehicle Trip Generation Rates (Trips Per 1,000 Square Feet of Gross Floor Area)						
			1.40	0.06	0.02	0.08	0.03	0.07	0.10
			Total Vehicle Trip Generation						
			1,229	55	16	71	25	63	88
		Mode Share	Total Project Trip Generation by Vehicle Type						
	Passenger Cars (Percent of Total)	79.57%	978	43	13	56	20	50	70
	2-Axle Trucks (Percent of Total)	3.46%	43	2	1	3	1	2	3
	3-Axle Trucks (Percent of Total)	4.64%	58	3	1	4	1	3	4
	4-Axle Trucks (Percent of Total)	12.33%	152	7	2	9	4	8	12
		PCE Factor	Project Trip Generation in Passenger Car Equivalents (PCE)						
	Passenger Cars)	1	978	43	13	56	20	50	70
	2-Axle Trucks	1.5	65	3	2	5	2	3	5
	3-Axle Trucks (Percent of Total)	2	116	6	2	8	2	6	8
	4-Axle Trucks (Percent of Total)	3	456	21	6	27	12	24	36
	PCE Total			1,615	73	23	96	36	83
2	High Cube Cold Storage Warehouse (Comprises 20% of Building) (ITE Land Use Category 157)	219.5	Vehicle Trip Generation Rates (Trips Per 1,000 Square Feet of Gross Floor Area)						
			2.12	0.08	0.03	0.11	0.03	0.09	0.12
			Total Vehicle Trip Generation						
			466	19	6	25	8	19	27
		Mode Share	Total Project Trip Generation by Vehicle Type						
	Passenger Cars (Percent of Total)	79.57%	371	15	5	20	6	15	21
	2-Axle Trucks (Percent of Total)	3.46%	17	1	1	2	1	1	2
	3-Axle Trucks (Percent of Total)	4.64%	22	1	1	2	1	1	2
	4-Axle Trucks (Percent of Total)	12.33%	58	3	1	4	1	3	4
		PCE Factor	Total Project Trip Generation in Passenger Car Equivalents (PCE)						
	Passenger Cars)	1	371	15	5	20	6	15	21
	2-Axle Trucks	1.5	26	2	2	4	2	2	4
	3-Axle Trucks (Percent of Total)	2	44	2	2	4	2	2	4
	4-Axle Trucks (Percent of Total)	3	174	9	3	12	3	9	12
	PCE Total			615	28	12	40	13	28
	Combined Total Project Trips								
		Mode Share	Combined Total Project Trip Generation by Vehicle Type						
	Passenger Cars (Percent of Total)	79.57%	1,349	58	17	75	25	66	91
	2-Axle Trucks (Percent of Total)	3.46%	59	3	1	4	1	3	4
	3-Axle Trucks (Percent of Total)	4.64%	79	3	1	4	1	4	5
	4-Axle Trucks (Percent of Total)	12.33%	209	9	3	12	4	11	15
	Total Combined Project Vehicle Trips (Non-PCE)		1,696	73	22	95	31	84	115
		PCE Factor	Combined Total Project Trip Generation in PCEs						
	Passenger Cars)	1	1,349	58	17	75	25	66	91
	2-Axle Trucks	1.5	89	5	2	7	2	5	7
	3-Axle Trucks (Percent of Total)	2	158	6	2	8	2	8	10
	4-Axle Trucks (Percent of Total)	3	627	27	9	36	12	33	45
	Total Combined Project Vehicle Trips (PCE)		2,223	96	30	126	41	112	153

Notes:

KSF = Thousands of Square Feet.

AM / PM Peak Hour of Adjacent Street Traffic = Trip generation coinciding with the highest hourly volumes of traffic on the adjacent streets during the AM (7:00 AM and 9:00 AM) and PM (4:00 PM and 6:00 PM) commuter peak periods.

Source of trip generation rates: Institute of Transportation Engineers (ITE) Trip Generation (11th Edition). Average rates for land use category 154 (High-Cube Transload and Short-Term Storage Warehouse) and land use category 157 (High-Cube Cold Storage Warehouse)

Source of passenger car / truck mode share (percentage of total): Fontana Truck Trip Generation Study for Heavy Warehouse Uses (August 2003).

Passenger Car Equivalents (PCE) factors: Industry standard values utilized in neighboring jurisdictions.

The source of the mode share split between passenger cars and trucks by axle is the Fontana Truck Trip Generation Study¹. The Passenger Car Equivalent (PCE) factors are industry standard conversion standards used throughout San Bernadino County. Passenger Car Equivalents (PCE) are provided by vehicle type and the conversion of trucks to PCEs is required by the City of Victorville for the calculation of intersection level of service.

As presented in **Table A**, the proposed project is estimated to generate 1,696 (2,223 PCE) daily trips, 95 (126 PCE) AM peak hour trips, and 115 (153 PCE) PM peak hour trips during the respective adjacent street peak hours.

C. Project Trip Distribution and Assignment

To address the impacts of the estimated project traffic, project trips are distributed by direction towards major commute routes, truck routes, freight haul corridors, and concentrations of residential and commercial / employment centers. Once the distribution pattern is established, project trips are assigned to the streets that provide the most direct route to destinations.

The distribution of the automobile trips (employees/visitors) is illustrated in **Exhibit C1**. The distribution of truck trips is illustrated in **Exhibit C2**. Truck trips are distributed to truck routes designated in Victorville's General Plan, the nearest of which includes Mojave Drive from I-15 to Highway 395. Highway 395, as a state highway, is also a designated truck route by the State of California. The assignment of the project's automobile trips to proposed study intersections is illustrated in **Exhibit D1**. The assignment of the project's truck trips to proposed study intersections (in passenger car equivalents) is illustrated in **Exhibit D2**. The assignment of total project trips (automobile plus trucks in passenger car equivalents) to proposed study intersections is illustrated in **Exhibit D3**.

D. Study Intersections

This focused traffic study evaluates project access driveways and key intersections on routes used by project traffic to access the site. This scope proposes to include four existing intersections and the four proposed driveways that accommodate most of the truck traffic as listed below:

- | | |
|---|---|
| 1. Highway 395 / Mojave Drive | 2. Mojave Drive / Mesa Linda Avenue |
| 3. Mojave Drive / Onyx Road | 4. Highway 395 / Cactus Road |
| 5. Onyx Road / Project Driveway "A" (Future Intersection) | 6. Onyx Road / Project Driveway "B" (Future Intersection) |
| 7. Mesa Linda Avenue / Project Driveway "C" (Future Intersection) | 8. Mesa Linda Avenue / Project Driveway "D" (Future Intersection) |
| 9. Mojave Drive / Main Driveway | |

The intersections of Highway 395 at Mojave Drive and at Cactus Road are currently traffic signal controlled. The intersections of Mojave Drive at Mesa Linda Avenue and Mojave Drive at Onyx Road are currently side-street stop-controlled.

Site Access

Access to the site is proposed from seven driveways: two right turn in/ right turn out only driveways on Mojave Drive, two full access driveways on Onyx Road, two full access driveways on Mesa Linda Avenue, and one full access driveway on Cactus Road. The assignment of the project's automobile trips to the project's main

¹ Fontana Truck Trip Generation Study. City of Fontana, County of San Bernardino, and the State of California. August 2003. This study collected empirical data and evaluated vehicle trip generation characteristics of several land use categories that typically generate significant volumes of truck traffic. The study collected data at numerous industrial facilities including mix of vehicles by axle. The data from this study has been integrated into ITE's Trip Generation manual.

driveways is illustrated in **Exhibit D1**. The assignment of the project's truck trips to the project's main driveways is illustrated in **Exhibit D2**².

E. Level of Service Methodology

Level of service will be calculated using the Highway Capacity Manual (HCM6) methodologies for signalized and non-signalized intersections. All study intersections will be analyzed to identify deficiencies in the city's Level of Service (LOS) policy. The capacity analysis will represent trucks in passenger car equivalents (PCE) in the existing and projected peak hour traffic volumes.

Signal warrant analyses. Signal warrant analyses (CA MUTCD Warrant #3 - Peak Hour) will be conducted at the non-signalized intersections of Mojave Drive study intersections (Mesa Linda Avenue, Onyx Road, Project Main Driveway) if they are found to operate at LOS E or LOS F in any scenario, or if they are warranted.

Mitigation measures. If a study intersection is found to operate with a LOS deficiency under any "with project" scenario, improvements will be identified to accomplish the following:

- If the addition of project traffic causes the level of service to change from a LOS D or better in the "without project" condition to a LOS E or F, the improvement should return the level of service to a LOS D or better. In future conditions, the deficiency described above is a "cumulative" impact and the study will include the project's fair-share contribution to the impact (and the cost to mitigate the deficiency).
- If an intersection is operating at a deficient LOS E or F in the "without project" condition and the project adds traffic to the intersection that increases the average delay, the improvement should, at a minimum, offset the project's increase in delay. In near-term and future conditions, the deficiency described above is a "cumulative" impact and the study will include the project's fair-share contribution to the impact (and the cost to mitigate the deficiency).

F. Traffic Study Scenarios

Scenarios analyzed in this study are consistent with City of Victorville, San Bernardino County Congestion Management Program (CMP), and Caltrans requirements for analysis scenarios which include:

1. Existing Conditions (AM (7-9 AM) and PM (4-6 PM) peak hours)
2. Background Conditions (Year 2024)
 - a. Existing + ambient growth (assuming a growth rate of 3.5% per year per city guidelines)
 - b. Adjacent planned and approved (but not yet built) development, specifically the approved 60-unit residential development on Mojave Drive (TT20422)
3. Background + Project Conditions (Year 2024)
 - a. Background conditions as defined above + project traffic
4. Future Horizon Year 2034 Without Project Conditions
 - a. Background + ambient growth (assuming a growth rate of 3.5% per year per city guidelines) over and above 2024 background conditions
 - b. Adjacent planned and approved (but not yet built) development
5. Future Horizon Year 2034 + Project
 - a. Future horizon year 2034 conditions + project traffic
6. Future Year (2044) Without Project Conditions (Caltrans required 20-year projections)
 - a. Derived from extrapolation of year 2040 SBTAM model projections
7. Future Year (2044) + Project Conditions

² The assignment of project generated traffic to the project's main driveways is preliminary and subject to refinement during the study.

G. Vehicle Miles Traveled (VMT) Screening

The following is a screening assessment to determine if the project is required to conduct a VMT analysis for environmental clearance under CEQA based on criteria in the City of Victorville's Vehicle Miles Traveled (VMT) Analysis Guidelines adopted by the City in June of 2020 in conformance with SB 743.

Project Screening from Conducting VMT Analyses

Victorville uses screening criteria to determine if a development project is required to conduct a VMT analysis. If a project satisfies the criteria described below it is considered to have a less than significant impact on VMT and does not require a VMT analysis.

Victorville has two criteria for screening projects from requiring a VMT analysis.

- The first criterion is based on the project's net daily increase in vehicle trips—if the project's net daily traffic generation is equal to or less than the city's threshold of 1,285 trips per day, it is exempt from a VMT analysis.
- The second criterion (*Project Type*) is comprised of a list of specific land uses types and a maximum size threshold in terms of dwelling units for residential projects and floor area for non-residential projects. The listed types of land uses are based on the maximum building size that would generate under 3,000 metric tons of Carbon Dioxide Equivalent (CO₂e) annually—the most stringent CO₂ emissions standard in California. Proposed projects matching the "project type" and falling within the size thresholds are exempt from a VMT analysis.

1. Screening for Net Increase in Daily Vehicle Trips

As shown in **Table A**, the project's net increase in daily trips is 1,696 daily vehicle trips (non-PCE) which exceeds the threshold of 1,285 daily trips in the city's guidelines. **Based on this criterion, the project is NOT screened from requiring a VMT analysis.**

2. Project Type Screening

According to the City of Victorville's VMT guidelines, the following type of land uses or development with the specified maximum size are exempt from having to conduct a VMT analysis:

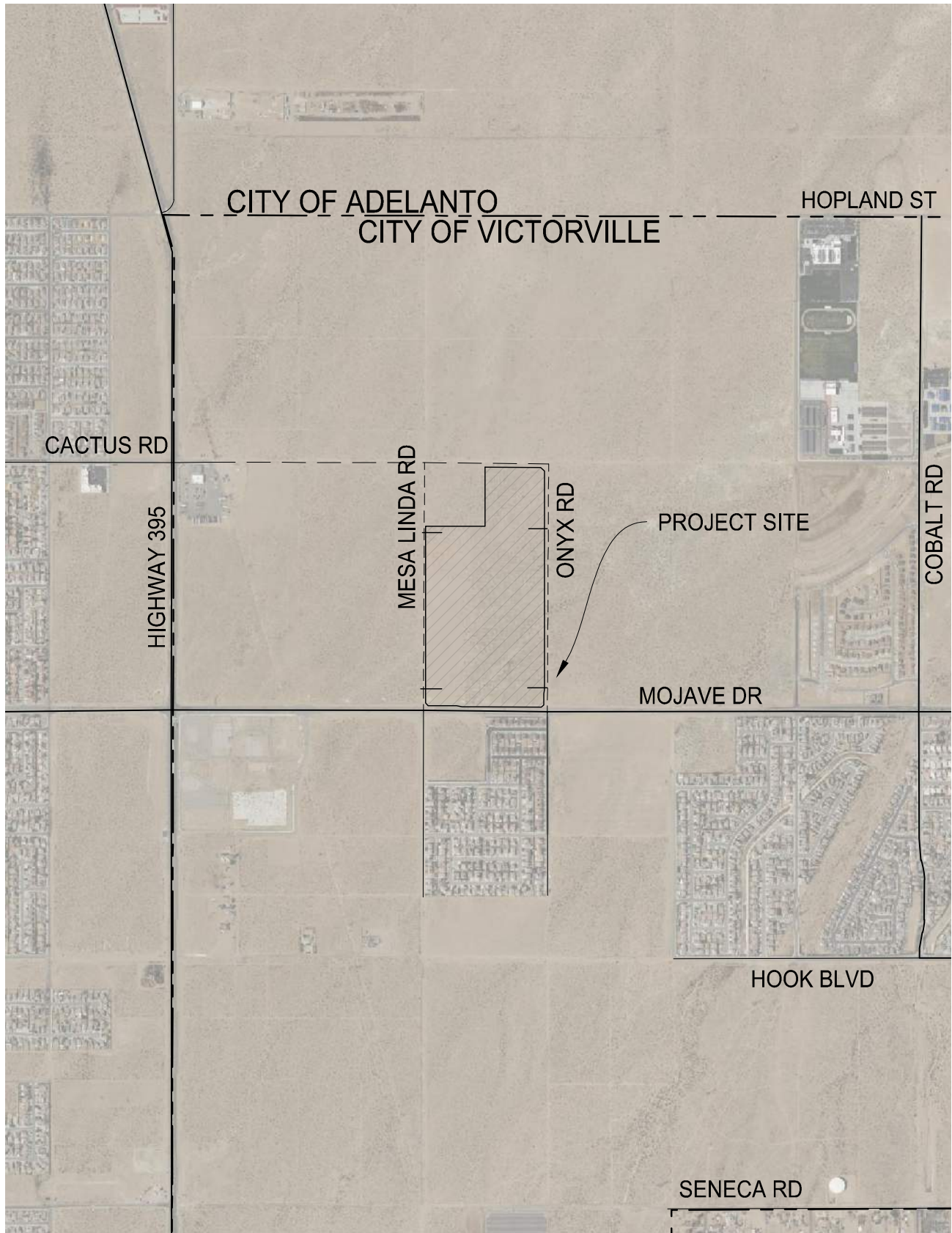
- Single Family or Multifamily Residential – 136 dwelling units or less
- Office — 227,000 square feet or less
- Retail — 122,000 square feet or less
- **Warehousing — 829,000 square feet or less**
- Light Industrial — 296,000 square feet or less
- K-12 Public School
- Daycare/Childcare/Pre-K
- Affordable Housing
- Student Housing
- Community Institutions, Social Services and Public Buildings

The proposed project is comprised of Warehousing with a total building floor area of 1,097,300 square feet (including internal office space) exceeds the city's warehousing size threshold of 829,000 square feet of floor area. **Based on Victorville's two criterion, the project is NOT screened from requiring a VMT analysis.**

A VMT analysis was prepared after submission of the September 26, 2022, scope agreement and is included as **Exhibit E**. The VMT analysis does not result in any significant environmental impacts. The traffic study will include a summary of the VMT screening evaluation and the results of the VMT analysis.

Attachments

1. Exhibit A – Vicinity Map
2. Exhibit B – Site Plan
3. Exhibit C1 – Auto Project Trip Distribution
4. Exhibit C2 – Truck Project Trip Distribution
5. Exhibit D1 – Auto Project Trips
6. Exhibit D2 – Truck PCE Project Trips
7. Exhibit D3 – Total PCE Project Trips
8. Exhibit E – Vehicle Miles Traveled (VMT) Analysis



--- CITY BOUNDARY

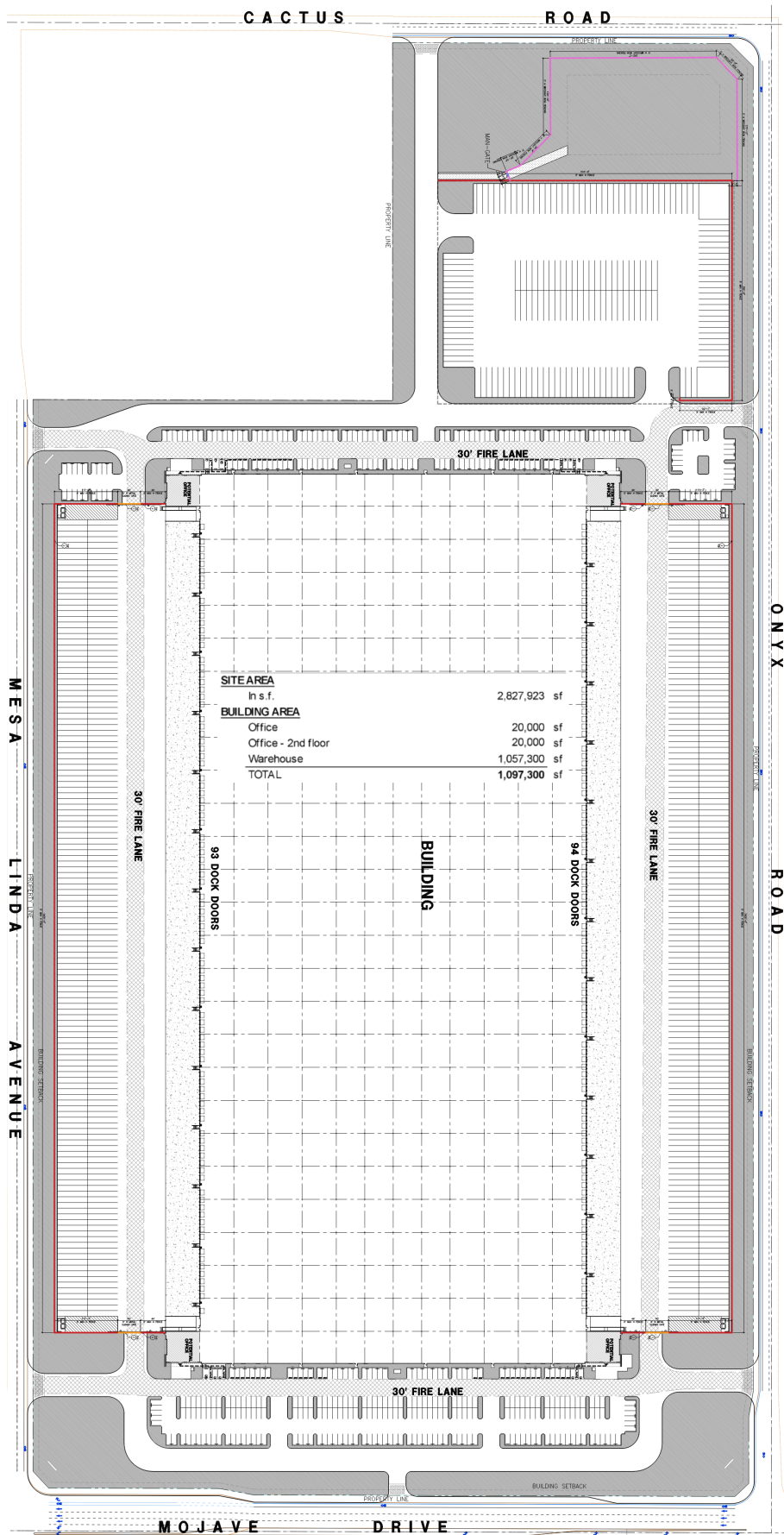
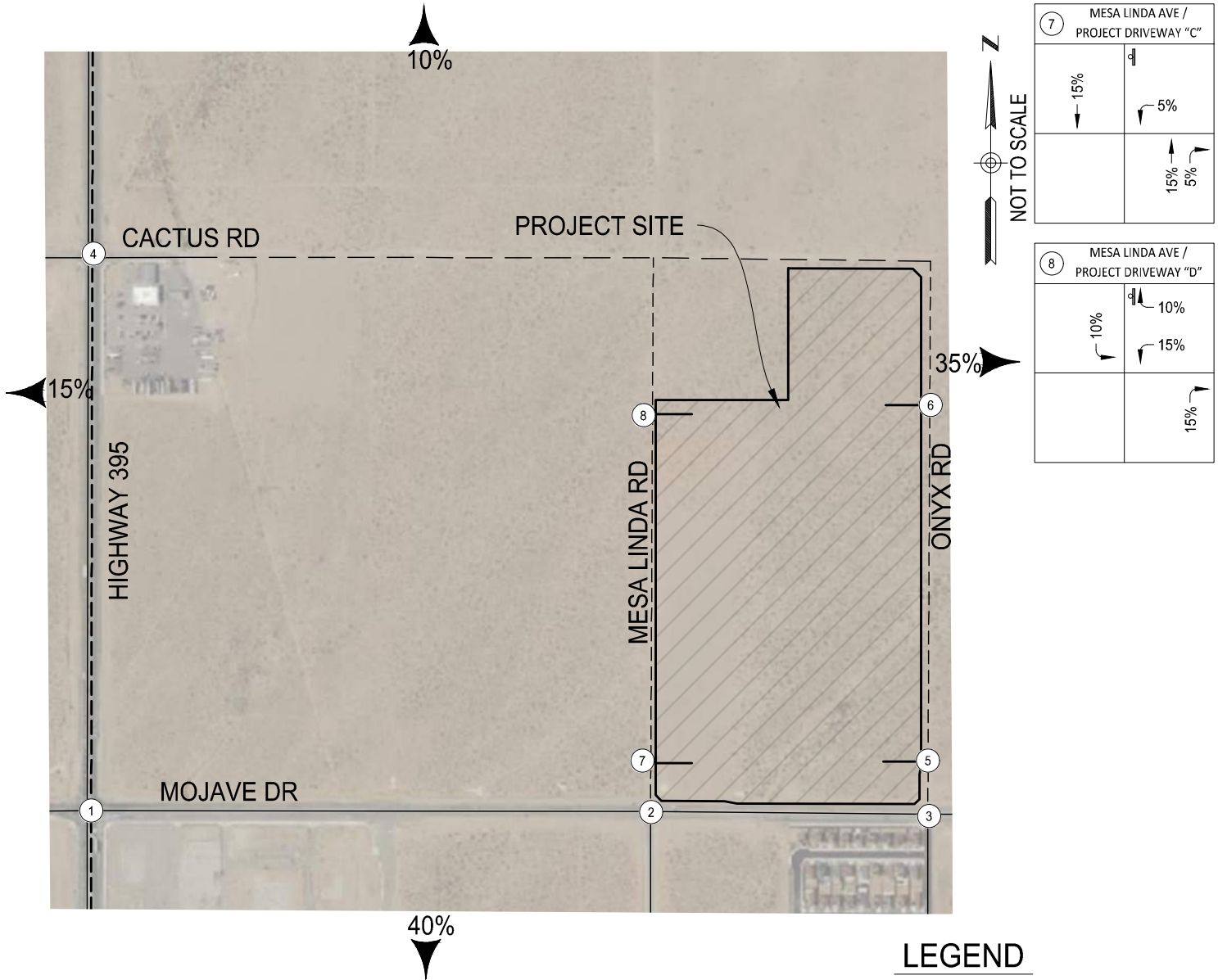


**EXHIBIT B: SITE PLAN
PROPOSED INDUSTRIAL SITE
VICTORVILLE, CALIFORNIA**

① HIGHWAY 395 / MOJAVE DR	② MOJAVE DR / MESA LINDA AVE	③ MOJAVE DR / ONYX RD	④ HIGHWAY 395 / CACTUS RD	⑤ ONYX RD / PROJECT DRIVEWAY "A"	⑥ ONYX RD / PROJECT DRIVEWAY "B"
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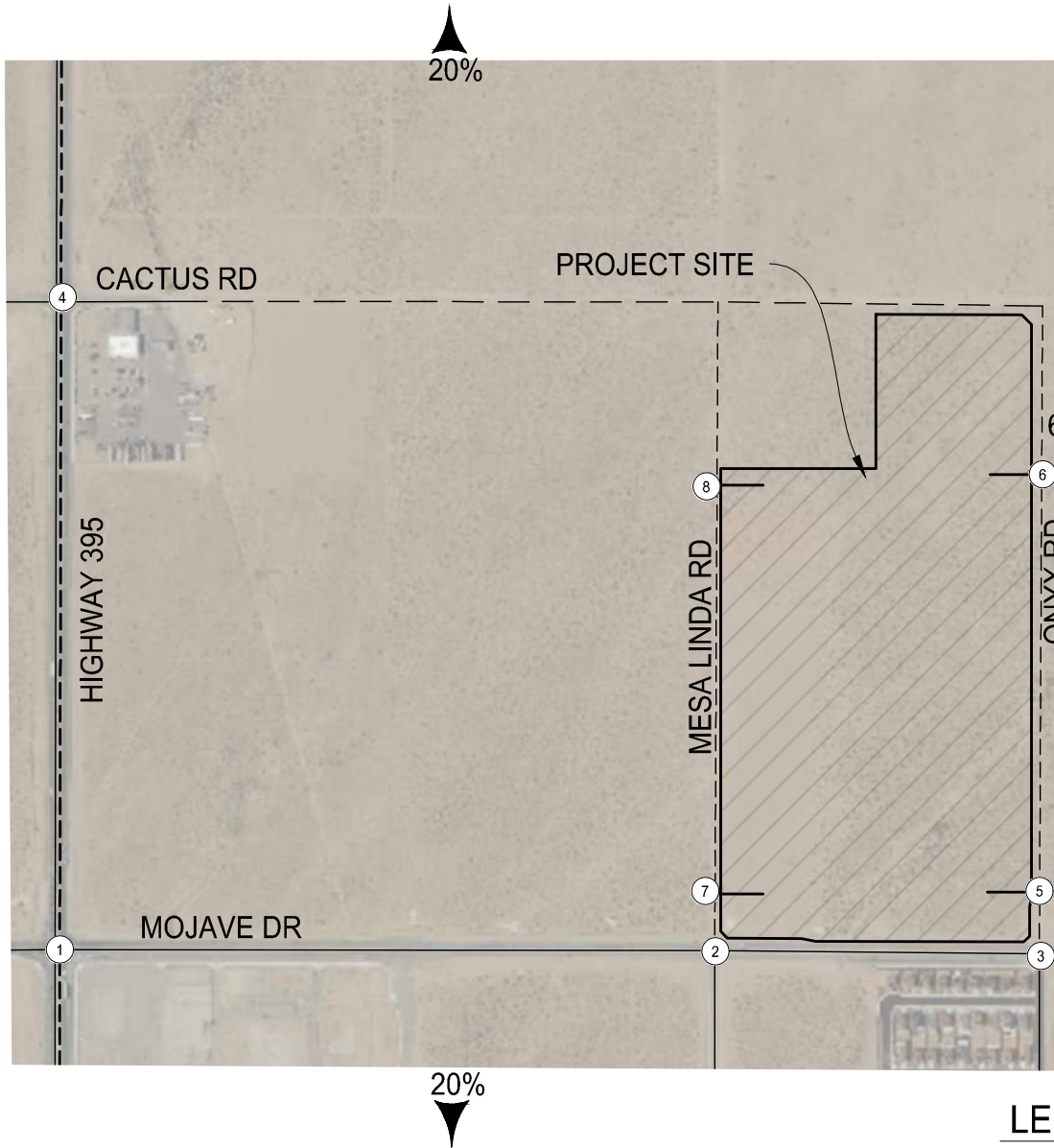
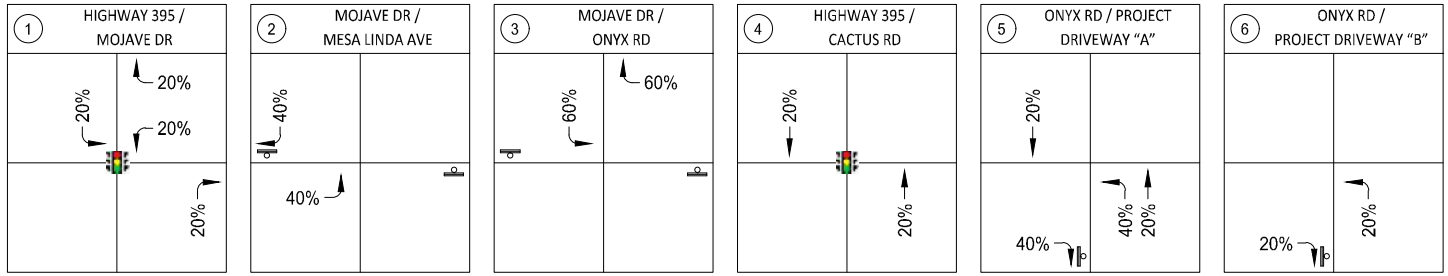


⑦ MESA LINDA AVE / PROJECT DRIVEWAY "C"
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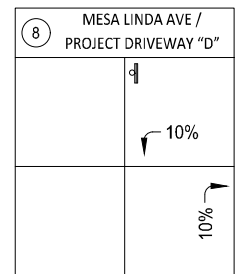
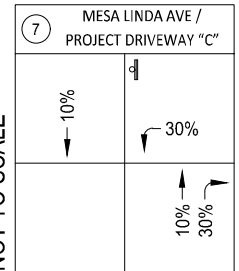
⑧ MESA LINDA AVE / PROJECT DRIVEWAY "D"
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LEGEND

- XX% - GENERAL PROJECT TRIP DISTRIBUTION
- XX% - SPECIFIC PROJECT TRIP PERCENTAGE
- ① - STUDY INTERSECTIONS
- SIGNALIZED INTERSECTION
- STOP CONTROLLED APPROACH

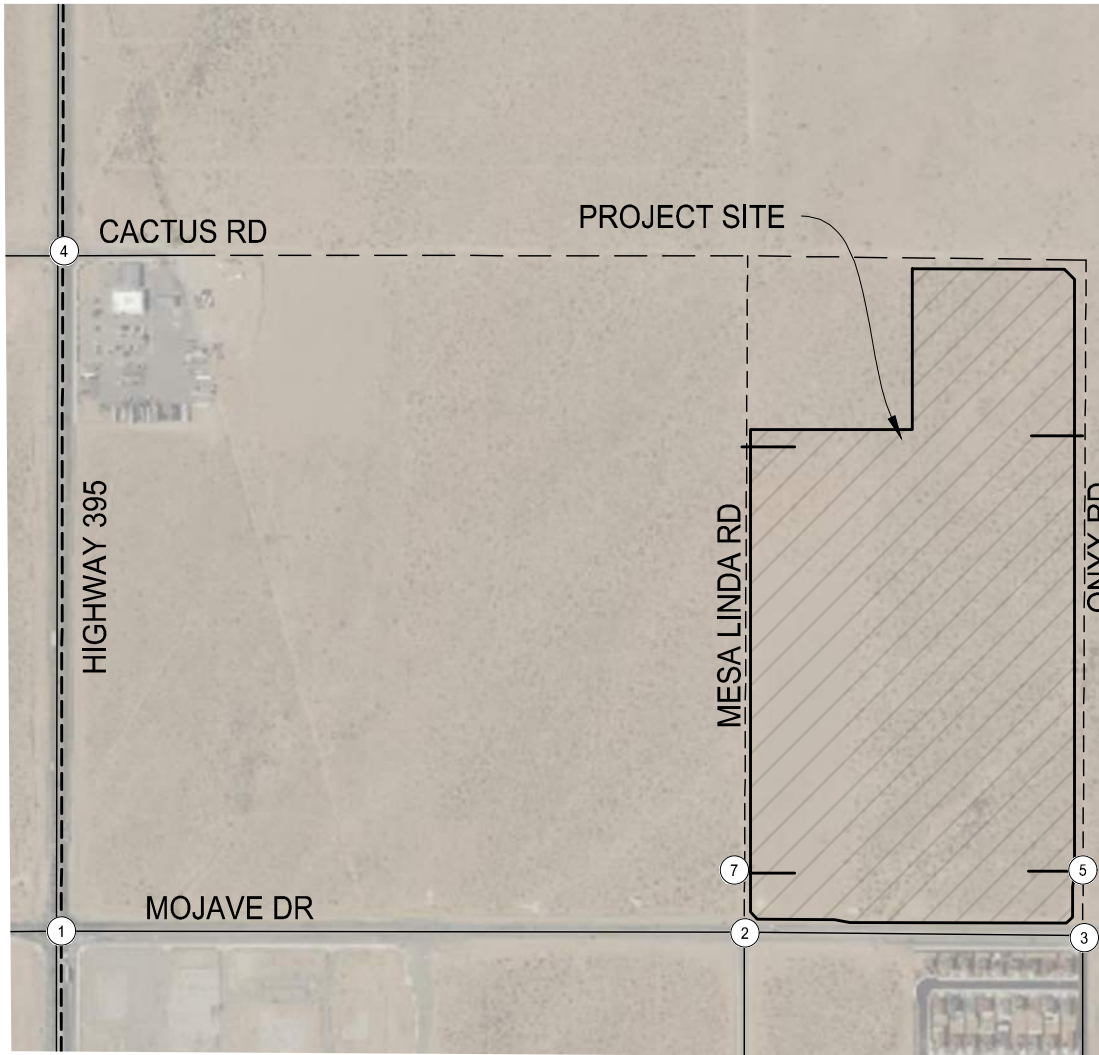
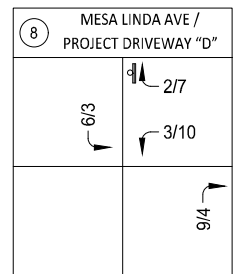
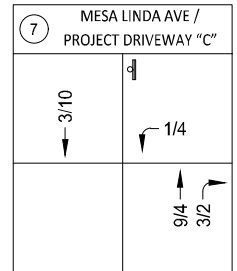
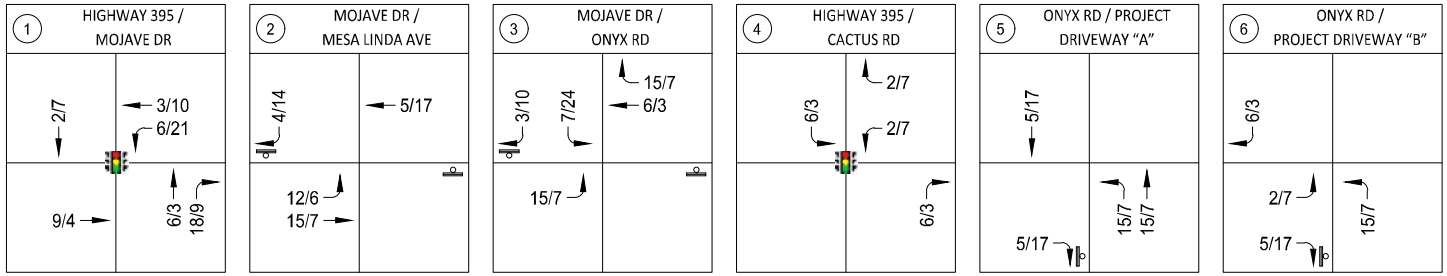


NOT TO SCALE



LEGEND

- XX% - GENERAL PROJECT TRIP DISTRIBUTION
- XX% - SPECIFIC PROJECT TRIP PERCENTAGE
- ① - STUDY INTERSECTIONS
- SIGNALIZED INTERSECTION
- STOP CONTROLLED APPROACH

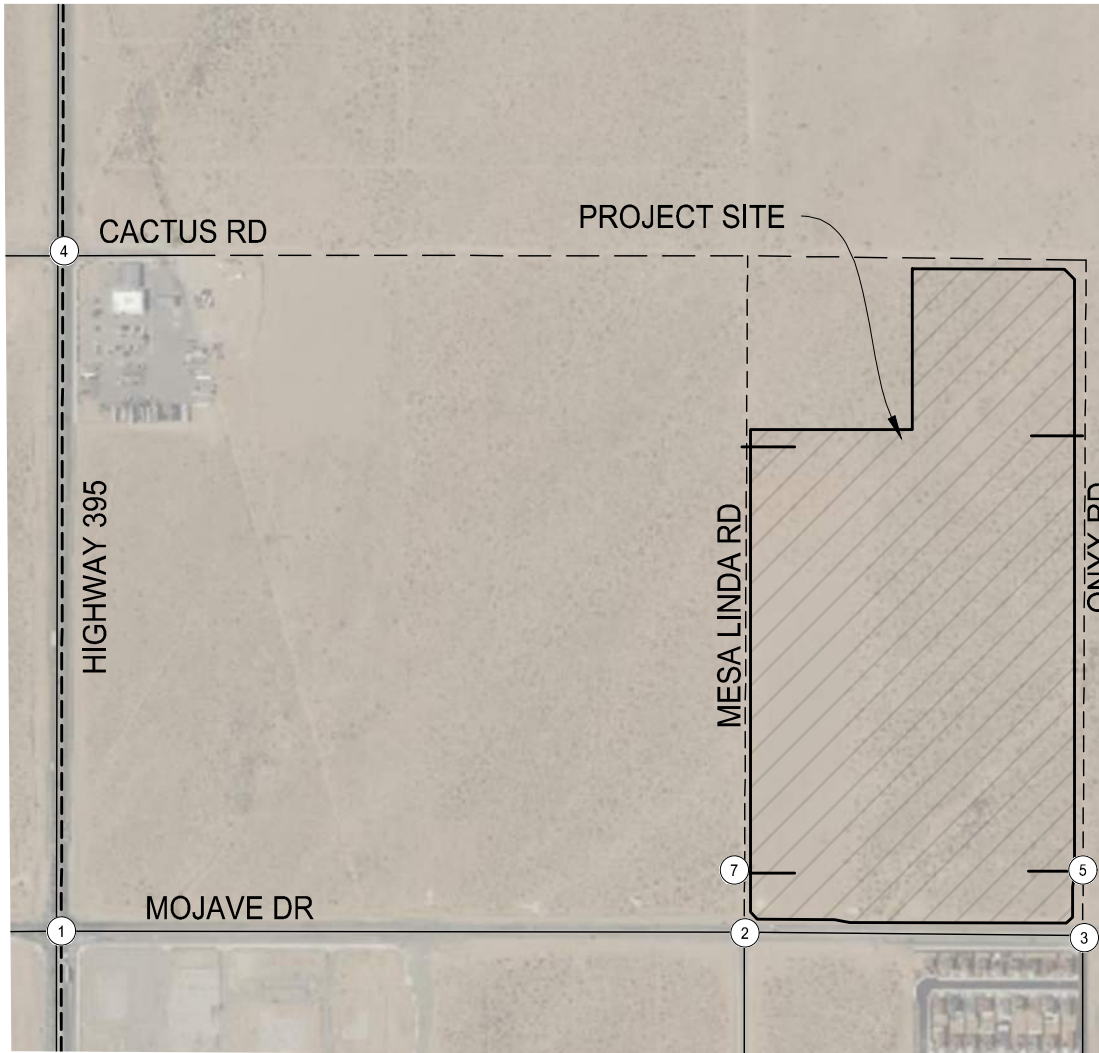
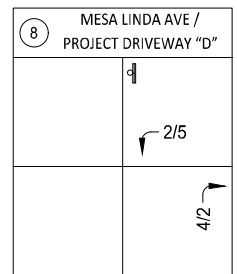
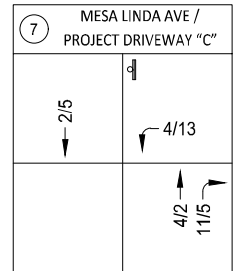
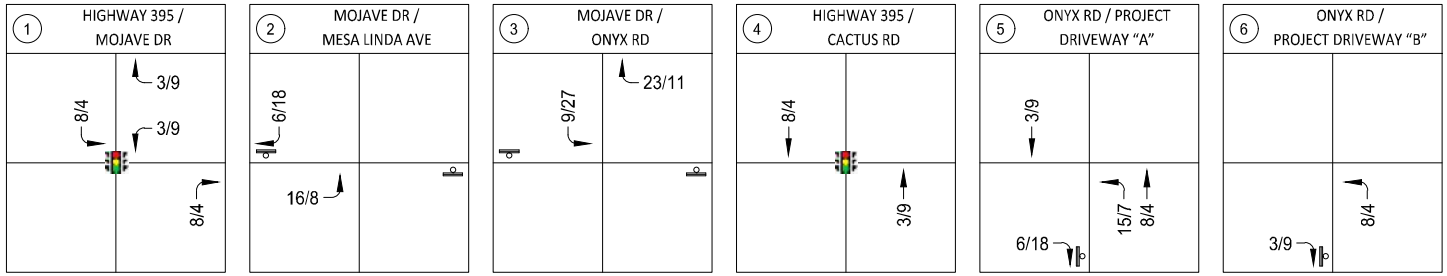


AUTO PROJECT TRIPS

AM PEAK HOUR - 58 IN / 17 OUT
PM PEAK HOUR - 25 IN / 66 OUT

LEGEND

- XX/XX - AM/PM PROJECT TRIP
- ① - STUDY INTERSECTIONS
- SIGNALIZED INTERSECTION
- STOP CONTROLLED APPROACH



TRUCK PROJECT TRIPS

AM PEAK HOUR - 38 IN / 13 OUT
PM PEAK HOUR - 16 IN / 46 OUT

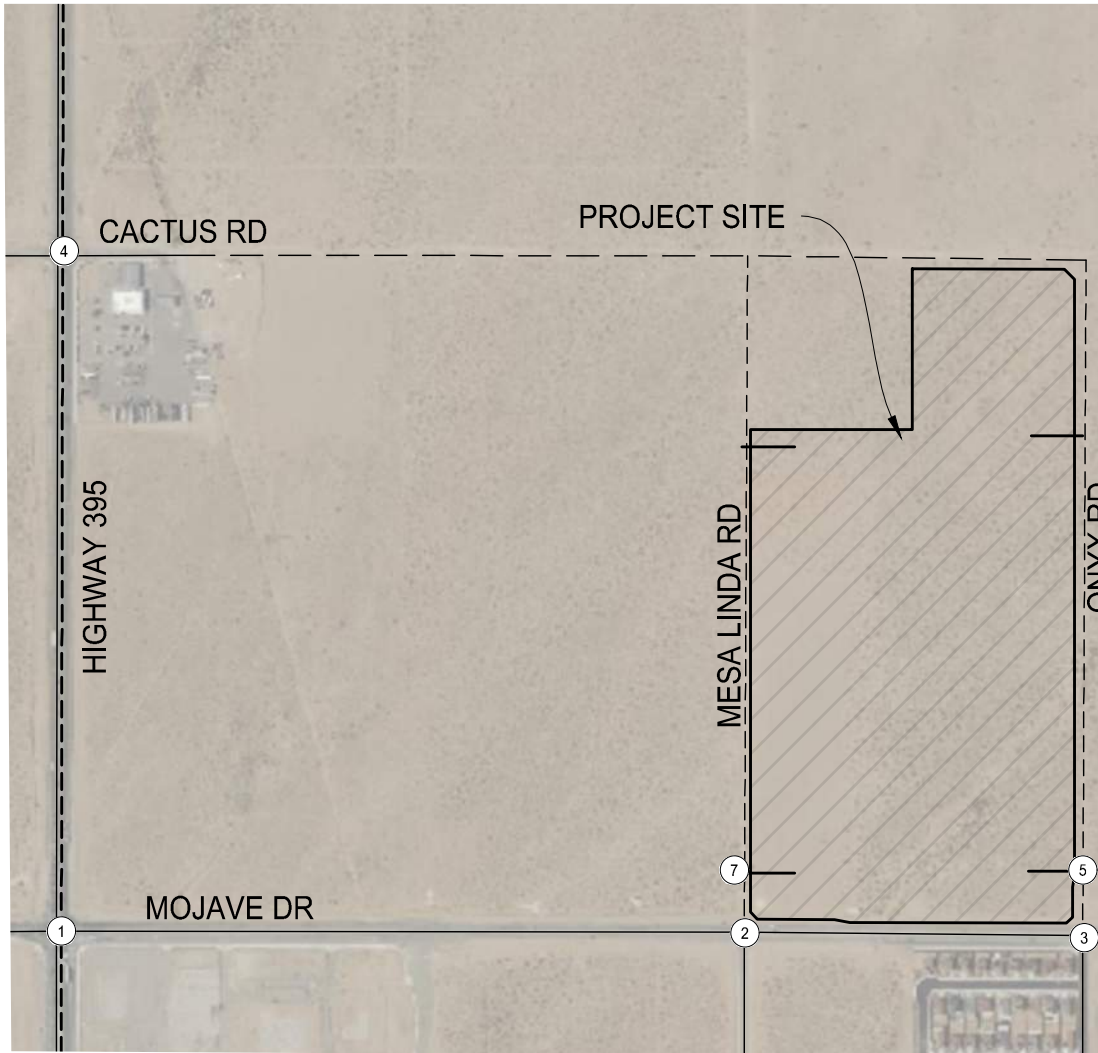
LEGEND

- XX/XX - AM/PM PROJECT TRIP
- ① - STUDY INTERSECTIONS
- SIGNALIZED INTERSECTION
- STOP CONTROLLED APPROACH

① HIGHWAY 395 / MOJAVE DR	② MOJAVE DR / MESA LINDA AVE	③ MOJAVE DR / ONYX RD	④ HIGHWAY 395 / CACTUS RD	⑤ ONYX RD / PROJECT DRIVEWAY "A"	⑥ ONYX RD / PROJECT DRIVEWAY "B"

⑦ MESA LINDA AVE / PROJECT DRIVEWAY "C"

⑧ MESA LINDA AVE / PROJECT DRIVEWAY "D"



TOTAL PROJECT TRIPS

AM PEAK HOUR - 96 IN / 30 OUT
PM PEAK HOUR - 41 IN / 112 OUT

LEGEND

- XX/XX - AM/PM PROJECT TRIP
- ① - STUDY INTERSECTIONS
- SIGNALIZED INTERSECTION
- STOP CONTROLLED APPROACH

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MEMORANDUM

Date:	December 5, 2022	GTS: 220912.01
To:	James M. Daisa, DEA	
From:	Rawad Hani, GTS	
Subject:	Vehicle Miles Traveled (VMT) Analysis – Mojave 68 Warehouse, Victorville, CA	

This memorandum describes the development of vehicle miles traveled (VMT) analysis for the proposed Mojave 68 Warehouse in the City of Victorville (City), CA. The project is located at the northeast corner of the intersection of Mojave Drive and Mesa Linda Avenue in the City of Victorville. The project proposes construction of a 1,097,300 square foot (SF) warehouse. The warehouse building will include an 877,800 SF of high-cube transload warehouse and 219,500 SF of high-cube cold storage warehouse. This VMT analysis evaluated the project using the 2016 and 2040 model years obtained from the San Bernardino County Transportation Authority (SBCTA).

Background

On December 28, 2018, the California Office of Administrative Law cleared the revised California Environmental Quality Act (CEQA) guidelines for use. Among the changes to the guidelines was removal of vehicle delay and level of service from consideration under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled (VMT).

Methodology

The project VMT analysis was conducted using the City of Victorville Resolution "Resolution P-20-010 PLAN 20-00011, ATTACHMENT 'A', Exhibit '1' – City of Victorville Vehicle Miles Traveled (VMT) Analysis Guidelines", dated May 27, 2020. The guidelines included project screening criteria which was reviewed for the project evaluation. The project doesn't qualify for VMT screening under any of the established screening criteria. Hence, a full VMT analysis was conducted using San Bernardino County Transportation Analysis Model (SBTAM) as recommended in the City's guidelines.

SBTAM model is a socioeconomic data-based model and so the project land uses were converted into model employment categories using conversion factors from SCAG's "Employment Density Study Summary Report – dated October 31, 2001". The land use conversion yielded a total of 520 employees as shown in Table 1 which was used as input for the model runs.

Table 1: Mojave 68 Warehouse – Employment Estimates

Land Use Type	Square Footage (SF)	SF/Employee *	Total Employees
High Cube Transload	877,800	2,111	416
High Cube Cold Storage	219,500	2,111	104
Total	1,097,300		520

Source: SCAG Employment Density Study Summary Report, October 31, 2001

VMT Analysis

Both baseline (2016) and horizon year (2040) model runs were used to estimate project's VMT impacts. SBTAM socioeconomic databases for the scenarios were updated with the project land use to calculate project VMT. Typically, project VMT is calculated by isolating the project in a new TAZ or multiple TAZs depending on the diversity of project land uses and project size. Since, SBTAM does not allow addition of new TAZs, one TAZ was borrowed for this project. The project TAZ was utilized to calculate project specific VMT per service population.

No project specific network modifications were conducted for the model scenarios. Full model runs with feedback loops were conducted for all of the project scenarios. It should be noted that the project land use was included in the model as additional land use in the cumulative (2040) scenario and no shifting of land use from other TAZs was used. In that regard, the cumulative VMT analysis can be considered as a conservative estimate.

Project's Origin/Destination (OD) VMT per service population can be used to evaluate project impact according to the guidelines. Origin-destination matrix outputs were used as trips and the trip lengths were derived from the skimming step to estimate OD VMT as recommended in the guidelines. OD matrix outputs include vehicle trips and hence no conversion for auto occupancy was applied. The trip length or distance was obtained using the model outputs from the "Skimming" step. The model skim outputs include peak and off-peak skim matrices by mode, similar to trip outputs from the model. OD VMT was estimated for both peak and off-peak and added together to estimate the total daily VMT for the project.

According to the guidelines, the project would constitute a significant impact if the project OD VMT per service population for base and cumulative scenarios is greater than City of Victorville General Plan Buildout OD VMT per service population. The City of Victorville General Plan Buildout OD VMT per service population was obtained from GTS "No project" model runs.

Table 2 below shows the project VMT metrics for both baseline (2016) and cumulative (2040) conditions along with the regional VMT thresholds.

Table 2: Project VMT analysis

2016	Mojave 68 Warehouse (project)	City of Victorville General Plan Buildout (Threshold)*
Population	0	174,718
Employment	520	50,493
Service Population	520	225,211
OD VMT	12,241	6,546,499
OD VMT per service population	23.5	29.1
2040	Mojave 68 Warehouse (project)	City of Victorville General Plan Buildout (Threshold)*
Population	0	174,718
Employment	520	50,493
Service Population	520	225,211
OD VMT	12,996	6,546,499
OD VMT per service population	25.0	29.1

* Threshold value estimated using GTS No Project model runs

Table 3 illustrates the project's effect on VMT. The project's effect on VMT is a comparison of roadway VMT within City of Victorville for both "With project" and "Without project" conditions.

Table 3: Roadway VMT within City of Victorville

2016	With Project	Without Project
Roadway VMT	2,258,954	2,252,678
Service population	161,475	160,955
VMT per service population	14.0	14.0
2040	With Project	Without Project
Roadway VMT	3,627,875	3,654,954
Service population	225,731	225,211
VMT per service population	16.1	16.2

Conclusion

Based on the VMT analysis as shown in above Tables 2 and 3, the project doesn't constitute a significant impact for both "project generated VMT" and "project's effect on VMT".