

Appendix D

Technical Review of Modeling and VMT Methodology for Media District Specific Plan
Traffic Study Report

Memorandum

Date: January 14, 2026

To: David Kriske and Marcos Fuentes, Community Planning Department, City of Burbank

From: John Muggridge and Griffin Kantz, Fehr & Peers

Subject: Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report (January 2026 Update)

LA25-3640

This memorandum expands the technical review Fehr & Peers conducted of WSP's travel demand modeling and vehicle miles traveled (VMT) forecasting methodology for the Burbank Media District Specific Plan ("MDSP") Traffic Study Report.

Three consultant teams are simultaneously developing three specific plans on behalf of the City of Burbank: the MDSP, the Downtown Burbank TOD Specific Plan ("DTSP"), and the Golden State Specific Plan ("GSSP"). WSP, the transportation consultant for the MDSP, submitted the traffic study report to the City in April 2024 in support of the plan's environmental impact report (EIR). City staff provided Fehr & Peers with an initial draft of WSP's traffic study report on April 29, 2024 and the report and full modeling data on May 15, 2024. WSP subsequently revised the VMT analysis and resubmitted the report to the City on May 20, 2024, and Fehr & Peers received the revised report on the same day. On June 3, 2024, Fehr & Peers submitted a memo summarizing a brief technical peer review of WSP's travel demand modeling and vehicle miles traveled (VMT) forecasting methodology, including updated VMT estimates and impact significance findings.

This new analysis revisits the land use amounts in the modeling files received in May 2024 and comprehensively revises them based on technical conversations between City, Rincon, and Fehr & Peers staff. The original land use inputs for the model were found to be inaccurately tabulated due to a combination of possible spreadsheet errata. This memo summarizes the quantitative effect of these corrected growth assumptions, provides updated VMT estimates (with additional clarifying information on baseline VMT per capita), and explains the VMT impact significance findings. These new forecasts supersede the estimates provided in the June 2024 VMT memo.



VMT Approach

In conversations between City community development staff and consultant teams for all three specific plans, the criteria in **Table 1** were established as the thresholds of significance for VMT impacts for all three specific plans.

These VMT thresholds are consistent with the approach provided in OPR’s *Technical Advisory on Evaluating Transportation Impacts in CEQA* (2018) for specific plans.¹ Additionally, each individual VMT threshold relates to those adopted by the City for development projects in its *Transportation Study Guidelines* (2020), although the MDSP is being evaluated through a program EIR rather than a project EIR, and these guidelines have not yet been formally updated to reference the City’s recently-updated travel demand model.²

Table 1: Specific Plan VMT Thresholds of Significance

VMT Type	Significance Threshold
Home-Based VMT per Capita	The project area’s home-based VMT per capita must not exceed 15 percent below the baseline citywide average home-based VMT per capita.
Home-Based Work VMT per Employee	The project area’s home-based work VMT per employee must not exceed 15 percent below the baseline citywide average home-based work VMT per employee.
Total VMT per Service Population	The project area’s total VMT per service population must not exceed 15 percent below the baseline citywide average total VMT per service population.

Source: Fehr & Peers (2024).

Importantly, each threshold involves a comparison of the VMT of the plan area with and without the project to the baseline VMT of the city as a whole, rather than comparing citywide-to-citywide or plan area to plan area. A citywide-to-citywide comparison (1) inappropriately evaluates the VMT effect of a specific plan by its ability to reduce the VMT per capita/employee/service population of the entire City to 15% below baseline, and (2) inappropriately blends the VMT effect of the specific plan with the cumulative VMT effects of all other future development elsewhere in the City.

The VMT analysis used the City’s travel demand model, which has a 2019 base year and 2035 horizon year in consistence with the *Burbank2035 General Plan*.³ Originally, all three specific plans’ consulting teams used 2019 as the baseline year for estimating baseline citywide average

¹ OPR (2018). *Technical Advisory on Evaluating Transportation Impacts in CEQA*. <https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf>.

² City of Burbank (2020). *Transportation Study Guidelines*. <<https://www.burbankca.gov/documents/173607/240347/20220622-BurbankTransportationStudyGuidelines-001.pdf>>.

³ City of Burbank (n. d.). *Burbank2035 General Plan*. <<https://www.burbankca.gov/web/community-development/general-plan>>.



VMT, since it is the base year of the model. This new analysis uses 2023 as the baseline year, because 2023 was the year when the Notices of Preparation (NOPs) were released for the MDSP and DTSP EIRs.^{4, 5} This also provides consistency with other chapters of the MDSP's EIR.

Shifting the VMT baseline from 2019 to 2023 necessitated preparing a modified 2035 scenario reflecting future growth only as approved in the General Plan, the 2021-29 Housing Element (adopted in 2022), other approved developments, and statewide legislation (e.g., for ADUs), accounting for any duplication between those various plans. This modified 2035 scenario will now serve as a common future baseline for all three specific plans in their VMT analyses, so that all three plans can use the same VMT thresholds based on metrics interpolated to the 2023 baseline year. Previously, each of the three specific plans had been treating the other two as related projects included in their respective "no build" scenarios, which had the undesirable effect of creating three different 2023 baselines when interpolating between 2019 and 2035 "no build" for all three plans.

The VMT significance thresholds used in this memo are based on linearly interpolating between the outputs of the 2019 base year and 2035 "adopted plans only" (a.k.a. "modified") scenarios of the model to 2023.

Previous Findings

The results of the MDSP's original VMT analysis are summarized in Tables 13 and 14 of the initial report (dated 4/30/24) and revised report (dated 5/20/24).

The previous memo (dated 6/3/24) summarized Fehr & Peers' technical review of the original MDSP modeling and VMT analysis. This review focused on identifying possible causes of discrepancies observed between the baseline VMT metrics in the MDSP report and those of Fehr & Peers' own analysis for other Burbank specific plans. Additionally, the previous review sought to ensure application of the correct plan-area-to-citywide comparison for evaluating VMT impacts as well as the updated 2023 baseline discussed above.

That memo ultimately recommended revisions to the MDSP VMT analysis, including: (1) correcting two likely VMT summation issues, (2) implementing the appropriate plan-area-to-citywide comparison for evaluating VMT impacts, and (3) using the updated 2023 baseline.

⁴ City of Burbank (2023). *Notice of Preparation of a Draft Program Environmental Impact Report: Burbank Media District Specific Plan Update*. <https://files.ceqanet.opr.ca.gov/292588-1/attachment/6PAmA6_UuvFSbByi2EY_LOMwNsUGcKDPSO8rzHFKSsD41bEZsVq8cH3ZRqSVgdzDmA78FY7pqHhQV7kf0>.

⁵ City of Burbank (2023). *Notice of Preparation of a Draft Program Environmental Impact Report: Downtown Burbank Transit-Oriented Development (TOD) Specific Plan*. <<https://files.ceqanet.opr.ca.gov/270150-3/attachment/F1MXBA8xbA0d00Hcl8Mqdu8zhXDtQV3h5sSs5jgaGVax6p2sBDFLioWZLBizXIWrjsCIXUIvGJNoHxw0>>.



At the time, Fehr & Peers' review did not detect major issues in the MDSP modeling methodology. Fehr & Peers was able to confirm that the outputs of the model run for the 2019 base year scenario matched those of our own internal "off-the-shelf" (OTS) run exactly, and we also observed that one of the 2035 scenarios ("Build 1") had identical land use assumptions as the OTS 2035 scenario of the model. The review of the modeling methodology was not scoped to investigate the accuracy of the actual future scenario land use assumptions in the modeling files received on 5/15/24, but to presuppose their accuracy.

However, a subsequent, more detailed review of the future scenario land use quantities in these modeling files revealed discrepancies between them and the growth assumptions in internal working files supplied by City and Rincon staff. The discrepancies appeared to be due (at least in part) to a combination of formula errors in internal working spreadsheets where the growth in each MDSP parcel was being tabulated. The overall effect of these discrepancies was a much-higher-than-expected incremental growth in commercial square footage for the Preferred Alternative and the Incremental Growth Alternative.

Review of Growth Assumptions

In the received modeling files, the 2035 "Build 1" scenario featured growth of +8,920 dwelling units (DU) and +9,718,000 commercial sq. ft. over 2035 "No Project", with all the growth localized to the MDSP area. The 2035 "Build 2" scenario—which served as the model scenario for the Preferred Alternative—contained identical land use assumptions as 2035 Build 1 plus modifications to network lane configuration in the MDSP area. Per City and Rincon staff, the expected incremental growth in the Preferred Alternative should have been only around +4,100 DU and +1.5 million commercial sq. ft. The 2035 "Build 3" scenario—which served as the model scenario for the Increased Growth Alternative—featured growth of +1,905 DU and +19,245,000 commercial sq. ft. over 2035 Build 2, with all the growth localized to the MDSP area. The expected incremental growth in the Increased Growth Alternative should have been around +4,100 DU and +3.2 million commercial sq. ft., per City and Rincon staff.

These incremental growth quantities were substantially larger than the project team had expected based on prior discussions. The cumulative +29.0 million commercial sq. ft. growth in the MDSP area shown between 2035 No Project and 2035 Increased Growth Alternative exceeded the entire citywide total of retail and office square footage in the 2019 base year scenario of the model (20.9 million sq. ft.).

Furthermore, since the 2035 Preferred Alternative scenario had been set equal to the OTS 2035 land use from the city model, and the 2035 No Project scenario land use had been derived by subtracting the difference between 2035 No Project and 2035 Preferred, the incremental growth between the 2019 base year scenario and the 2035 No Project scenario in the MDSP area was less than expected: +951 DU and +32,600 commercial sq. ft. Fehr & Peers last updated the OTS 2035



model scenario for the City in November 2023. This scenario includes assumptions of future land use in the MDSP area based on the growth forecasts prepared by WSP and shared by City staff in October 2023. It also includes assumptions of planned growth across the city due to the DTSP, the GSSP, and as approved in the General Plan, the 2021-29 Housing Element (adopted in 2022), other approved developments, and statewide legislation (e.g., for ADUs). Based on this prior work, the expected incremental growth in the MDSP area should have been around +6,100 DU and +7.1 million commercial sq. ft.

Following coordination with City and Rincon staff, Fehr & Peers implemented revisions to the MDSP future scenario growth assumptions and land use modeling inputs.

Revised Growth Assumptions & Updated Results

Fehr & Peers re-tabulated the model land use input tables for all three MDSP future scenarios by incrementally adding all cumulative planned growth in the city to the 2019 base year scenario, ensuring no duplication between plans (e.g., accounting for developments already approved as part of the 2035 General Plan or the 2021-29 Housing Element). This is the same method as was originally deployed to generate the OTS 2035 scenario, the 2035 Adopted Plans Only scenario, and the various future scenarios for the DTSP VMT analysis.

The revisions to the MDSP future scenario model inputs include:

- **Formula corrections:** Correcting spreadsheet formula errata, as necessary.
- **Pipeline projects:** For MDSP area developments already in plan check, the 2035 No Project scenario uses the project descriptions posted on the City website rather than square footage calculated from zoned capacity. However, the 2035 Preferred Alternative and 2035 Increased Growth Alternative scenarios assume that the project applicants would take advantage of any additional zoned capacity resulting from higher allowed FAR in those two scenarios. These pipeline projects include:
 - 3201 W. Olive Ave. (a.k.a. "Bob Hope Center): 144 DU, 1,058 commercial sq. ft.
 - 3700 Riverside Dr.: 49 DU, 2,000 commercial sq. ft.
 - 4100 Riverside Dr.: 72 DU, 16,628 commercial sq. ft.
- **Adjusted office/retail split:** Where available, office/retail split assumptions obtained from Rincon/WSP's internal working file for the Preferred Alternative growth forecasts inform how the commercial square footage is allocated between office and retail for each TAZ in each scenario. These office/retail split assumptions had previously been used for estimating water and sewer demand. Some select TAZs that were previously indicated as 100% office were adjusted to be 95% office / 5% retail, based on guidance from City staff. For TAZs where these splits were not previously provided, this revised analysis also assumes a 95% office / 5% retail split. Determining how commercial square footage is



split between office and retail land use is important for travel demand modeling purposes because retail has 3.5x as much trip generation per square foot as office.

- **Warner Bros. Ranch development:** Commercial growth on the Warner Bros. Ranch property is by far the largest single development in all three future scenarios. Estimated at +1.4 million sq. ft. between the 2019 base year and the 2035 No Project Alternative, this build-out amount is capped at the same amount for 2035 Preferred Alternative and 2035 Increased Growth Alternative.
- **Network lane reconfigurations:** The revised modeling analysis uses the same network modifications for the future scenarios as documented in the original Traffic Study Report (revised version, dated 5/20/24). These modifications include bidirectional lane reductions on Olive Ave., Pass Ave., and Riverside Dr. and posted speed limit reductions on Riverside Dr. These changes correspond with planned lane reconfigurations for California St., Olive Ave., Pass Ave., Riverside Dr., and Verdugo Ave. shown in conceptual cross-section diagrams shared by City staff on 9/6/24. The OTS 2035 scenario of the city model already reflects lane reconfigurations along Riverside Dr. and Olive Ave. as part of the Metro North Hollywood-Pasadena BRT project and these changes did not conflict with the lane reductions added for this analysis.

Customarily, when Fehr & Peers performs scenario-based analysis with the City's model, we make two additional adjustments:

- For any large change in citywide population, we proportionally adjust the citywide K-12 school land use to reflect the effects of growth on citywide school attendance and home-based school trip generation.
- For any large changes in land use anywhere in the model, we recalibrate the model's internalization rate assumptions for each trip purpose type (in the trip rate table), to ensure that the model can balance trip productions to trip attractions without skewing overall trip generation rates.

Fehr & Peers applied each of these adjustments to the final model input files to ensure more accurate model convergence, and to ensure consistency in approach with the DTSP VMT analysis.

Table 2 on the following page provides a summary of the differences in growth assumptions between the previous and the revised model land use inputs for the MDSP area. The net addition of 600 hotel rooms shown in the table is an upper limit for hotel development, not a precise estimate of proposed growth.

The "revised" incremental growth assumptions shown in Table 2 can differ from the growth assumptions shown elsewhere in the MDSP EIR, due to the inclusion here of other, cumulative growth within the MDSP area. The incremental growth shown in Table 2 between scenarios includes growth from ADUs; entitled commercial development at the Burbank, Disney, and Warner Bros. Studios in office-equivalent gross square footage; and the growth in K-12 school



attendance (which the model treats as a land use type). This related growth is included in each model scenario to accurately forecast the cumulative effects of development.

Table 2: Revised Growth Assumptions Summary

Land Use Category	Units	2019 Base	2035 No Project	2035 Preferred	2035 Increased Growth
Geography		Plan Area	Plan Area	Plan Area	Plan Area
Residential					
Previous	(DU)	3,073	4,024	12,944	14,849
		-	(+951)	(+8,920)	(+1,905)
Revised	(DU)	3,073	9,168	13,301	17,420
		-	(+6,095)	(+4,133)	(+4,119)
Commercial					
Previous	(KSF)	9,868.2	9,900.8	19,619.2	38,864.0
		-	(+32.6)	(+9,718.5)	(+19,244.7)
Revised	(KSF)	9,868.2	16,961.3	18,471.1	21,718.8
		-	(+7,093.1)	(+1,509.8)	(+3,247.7)
Lodging					
Previous	(rooms)	261	261	861	861
		-	(+0)	(+600)	(+0)
Revised	(rooms)	261	861	861	861
		-	(+600)	(+0)	(+0)

DU = dwelling units; KSF = 1,000 sq. ft..
 Source: Fehr & Peers (2024).

Specific Plan VMT Results

Table 3 on the following page provides the previous VMT results and **Table 4** on page afterwards provides the revised VMT results. The “2035 Adopted Plans Only” scenario in the table is the modified 2035 scenario mentioned earlier, reflecting future growth only as approved in the General Plan, the 2021-29 Housing Element (adopted in 2022), other approved developments, and statewide legislation (e.g., for ADUs). This scenario is used solely for the purpose of interpolating 2023 baseline citywide average VMT. **Table 5** is a variant of Table 4 showing all VMT results at the plan area level, as a reference for air quality and noise analysis. This table also includes 2023 VMT results, but interpolated between 2019 Base and 2035 No Project instead.



Table 3: Previous Media District Specific Plan VMT Results Summary

VMT Metrics	2019 Base	2023 <i>Interpolated</i>	2035 Adopted Plans Only	2035 No Project	2035 Preferred	2035 Increased Growth
Geography	Citywide	<i>Citywide</i>	Citywide	Plan Area	Plan Area	Plan Area
Source	Model	<i>Interpolated</i>	Model	Model	Model	Model
Socio-Economic Data						
Population	112,116	<i>117,062</i>	131,901	9,978	32,100	36,825
Employment	96,886	<i>105,077</i>	129,648	34,627	69,453	139,305
Service Population	209,002	<i>222,139</i>	261,549	44,605	101,553	176,130
Daily Vehicle Trips						
Total Vehicle Trips	798,700	<i>818,994</i>	879,874	121,674	282,123	500,247
Home-Based Vehicle Trips (Production)	203,269	<i>202,331</i>	199,516	12,478	38,463	44,072
Home-Based Work Vehicle Trips (Attraction)	128,066	<i>134,070</i>	152,081	44,853	81,929	149,369
Total Vehicle Trips per Service Pop.	3.8	<i>3.7</i>	3.4	2.7	2.8	2.8
Home-Based Vehicle Trips per Capita	1.8	<i>1.7</i>	1.5	1.3	1.2	1.2
Home-Based Work Veh. Trips per Emp.	1.3	<i>1.3</i>	1.2	1.3	1.2	1.1
Average Trip Length (miles)						
Total Trip	8.3	<i>8.4</i>	8.7	8.7	8.5	8.5
Home-Based Trip Production	8.5	<i>8.5</i>	8.4	8.7	8.5	8.2
Home-Based Work Trip Attraction	10.2	<i>10.5</i>	11.1	10.7	10.8	11.3
Daily Vehicle Miles Traveled						
Total VMT	6,607,379	<i>6,876,147</i>	7,682,452	1,061,826	2,398,240	4,266,486
Home-Based VMT (Production)	1,736,718	<i>1,721,252</i>	1,674,854	108,496	327,293	362,496
Home-Based Work VMT (Attraction)	1,309,585	<i>1,406,000</i>	1,695,245	477,994	886,082	1,687,592
Total VMT per Service Population	31.6	<i>31.0</i>	29.4	23.8	23.6	24.2
Home-Based VMT per Capita	15.5	<i>14.7</i>	12.7	10.9	10.2	9.8
Home-Based Work VMT per Emp.	13.5	<i>13.4</i>	13.1	13.8	12.8	12.1

Source: Fehr & Peers (2024). 2023 is interpolated between 2019 Base and 2035 Adopted Plans Only.



Table 4: Revised Media District Specific Plan VMT Results Summary

VMT Metrics	2019 Base	2023 Interpolated	2035 Adopted Plans Only	2035 No Project	2035 Preferred	2035 Increased Growth
Geography	Citywide	Citywide	Citywide	Plan Area	Plan Area	Plan Area
Source	Model	Interpolated	Model	Model	Model	Model
Socio-Economic Data						
Population	112,116	117,062	131,901	22,737	32,985	43,200
Employment	96,886	105,077	129,648	63,056	68,529	79,164
Service Population	209,002	222,139	261,549	85,793	101,514	122,364
Daily Vehicle Trips						
Total Vehicle Trips	798,700	818,994	879,874	221,780	246,409	297,058
Home-Based Vehicle Trips (Production)	203,269	202,331	199,516	27,968	39,960	51,264
Home-Based Work Vehicle Trips (Attraction)	128,066	134,070	152,081	77,187	81,128	89,723
Total Vehicle Trips per Service Pop.	3.8	3.7	3.4	2.6	2.4	2.4
Home-Based Vehicle Trips per Capita	1.8	1.7	1.5	1.2	1.2	1.2
Home-Based Work Veh. Trips per Emp.	1.3	1.3	1.2	1.2	1.2	1.1
Average Trip Length (miles)						
Total Trip	8.3	8.4	8.7	8.7	8.6	8.5
Home-Based Trip Production	8.5	8.5	8.4	8.6	8.6	8.5
Home-Based Work Trip Attraction	10.2	10.5	11.1	10.8	10.8	10.8
Daily Vehicle Miles Traveled						
Total VMT	6,607,379	6,876,147	7,682,452	1,924,031	2,129,476	2,537,251
Home-Based VMT (Production)	1,736,718	1,721,252	1,674,854	241,167	343,134	436,231
Home-Based Work VMT (Attraction)	1,309,585	1,406,000	1,695,245	835,683	877,548	970,088
Total VMT per Service Population	31.6	31.0	29.4	22.4	21.0	20.7
Home-Based VMT per Capita	15.5	14.7	12.7	10.6	10.4	10.1
Home-Based Work VMT per Emp.	13.5	13.4	13.1	13.3	12.8	12.3

Source: Fehr & Peers (2026). 2023 is interpolated between 2019 Base and 2035 Adopted Plans Only.



Table 5: Rev. Media District Specific Plan VMT Results Summary (Plan Area Only)

VMT Metrics	2019 Base	2023 <i>Interpolated</i>	2035 No Project	2035 Preferred	2035 Increased Growth
Geography	Plan Area	<i>Plan Area</i>	Plan Area	Plan Area	Plan Area
Source	Model	<i>Interpolated</i>	Model	Model	Model
Socio-Economic Data					
Population	7,621	<i>11,400</i>	22,737	32,985	43,200
Employment	34,599	<i>41,713</i>	63,056	68,529	79,164
Service Population	42,220	<i>53,113</i>	85,793	101,514	122,364
Daily Vehicle Trips					
Total Vehicle Trips	130,335	<i>153,196</i>	221,780	246,409	297,058
Home-Based Vehicle Trips (Production)	10,965	<i>15,216</i>	27,968	39,960	51,264
Home-Based Work Vehicle Trips (Attraction)	48,123	<i>55,389</i>	77,187	81,128	89,723
Total Vehicle Trips per Service Pop.	3.1	<i>2.9</i>	2.6	2.4	2.4
Home-Based Vehicle Trips per Capita	1.4	<i>1.3</i>	1.2	1.2	1.2
Home-Based Work Veh. Trips per Emp.	1.4	<i>1.3</i>	1.2	1.2	1.1
Average Trip Length (miles)					
Total Trip	8.4	<i>8.5</i>	8.7	8.6	8.5
Home-Based Trip Production	8.5	<i>8.5</i>	8.6	8.6	8.5
Home-Based Work Trip Attraction	10.2	<i>10.4</i>	10.8	10.8	10.8
Daily Vehicle Miles Traveled					
Total VMT	1,096,228	<i>1,303,179</i>	1,924,031	2,129,476	2,537,251
Home-Based VMT (Production)	92,946	<i>130,001</i>	241,167	343,134	436,231
Home-Based Work VMT (Attraction)	492,878	<i>578,579</i>	835,683	877,548	970,088
Total VMT per Service Population	26.0	24.5	22.4	21.0	20.7
Home-Based VMT per Capita	12.2	11.4	10.6	10.4	10.1
Home-Based Work VMT per Emp.	14.2	13.9	13.3	12.8	12.3

Source: Fehr & Peers (2026). 2023 is interpolated between 2019 Base and 2035 No Project.



Below is a discussion of the revised plan-area VMT results shown in both Tables 4 and 5 in comparison with the previous plan-area results shown in Table 3. Refer to the three columns furthest to the right in each table.

Under the 2035 Preferred Alternative conditions, the future MDSP area population of 32,985 is estimated to produce 39,960 daily vehicle trips and 343,134 daily VMT, with an average of 10.4 home-based VMT per capita. The 68,529 future employees in the MDSP area are estimated to attract 81,128 daily vehicle trips and 877,548 daily VMT, with an average of 12.8 home-based work VMT per employee. The total 101,514 service population in the MDSP area is estimated to generate 246,409 daily vehicle trips and 2,129,476 daily VMT, with an average of 21.0 total VMT per service population.

Under the 2035 Increased Growth Alternative conditions, the future MDSP area population of 43,200 is estimated to produce 51,264 daily vehicle trips and 436,231 daily VMT, with an average of 10.1 home-based VMT per capita. The 79,164 future employees in the MDSP area are estimated to attract 89,723 daily vehicle trips and 970,088 daily VMT, with an average of 12.3 home-based work VMT per employee. The total 122,364 service population in the DTSP area is estimated to generate 297,058 daily vehicle trips and 2,537,251 daily VMT, with an average of 20.7 total VMT per service population.

Compared to the previous VMT results, these updated 2035 Preferred Alternative results are relatively similar in magnitude as before, but the 2035 Increased Growth Alternative totals for population and home-based VMT are much greater and the totals for employees, overall service population, home-based work VMT, and total VMT are much less. One predominant reason that the 2035 Preferred Alternative results are so similar is that the previous modeling analysis began from the OTS 2035 model scenario and subtracted to develop the land use estimates for the 2035 No Project Alternative. In this revised analysis, the land use estimates for each future scenario were tabulated by incrementally adding all cumulative planned growth in the city to the 2019 base year scenario.

Comparison to Significance Thresholds

Table 6 on the following page computes the new VMT thresholds of significance. Here, as in Table 4, 2023 baseline citywide average VMT per capita is obtained by interpolating between 2019 Base and 2035 Adopted Plans Only. The percentages in parentheses compare the plan area VMT per capita in 2035 to the 2023 estimates. A reduction of at least 15% is required to meet the City's threshold for no significant VMT impact.



Table 6: VMT Significance Threshold Summary

VMT Type	2019 Base	2023 Interpolated	2035 Adopted Plans Only	VMT Threshold (15% Below 2023)	2035 No Project	2035 Preferred	2035 Increased Growth
Home-Based VMT per Capita	15.5	14.7	12.7	12.5	10.6 (-27.9%)	10.4 (-29.3%)	10.1 (-31.3%)
Home-Based Work VMT per Emp.	13.5	13.4	13.1	11.4	13.3 (-1.0%)	12.8 (-4.3%)	12.3 (-8.4%)
Total VMT per Service Pop.	31.6	31.0	29.4	26.3	22.4 (-27.5%)	21.0 (-32.2%)	20.7 (-33.0%)

Source: Fehr & Peers (2024). Percentages in parentheses indicate comparison to 2023.

These results show that the Preferred Alternative would exceed the City’s threshold of significance for home-based work VMT per employee but would not exceed the thresholds for home-based VMT per capita or total VMT per service population. Similarly, the Increased Growth Alternative would exceed the City’s threshold of significance for home-based work VMT per employee but would not exceed the thresholds for home-based VMT per capita or total VMT per service population.

Thus, the project would be considered to have a significant transportation impact on the environment under both the Preferred Alternative and Increased Growth Alternative.

Table 7 summarizes the updated VMT impact findings.

Table 7: VMT Impact Summary

VMT Significance Threshold	Preferred Alternative	Increased Growth Alternative
Home-Based VMT per Capita	Less Than Significant	Less Than Significant
Home-Based Work VMT per Employee	Significant	Significant
Total VMT per Service Population	Less Than Significant	Less Than Significant

Source: Fehr & Peers (2024).