

# Revised Vehicle Miles Traveled Analysis

## Casitas Selma

Located on the Southwest Quadrant of  
Highland Avenue and Floral Avenue

In the City of Selma, California

*Prepared for:*

Lance-Kashian & Company  
265 East River Park Circle  
Fresno, CA 93720

April 15, 2025

Project No. 001-009



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In the City of Selma, CA

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This Revised Vehicle Miles Traveled Analysis has been prepared under the direction of a licensed Traffic Engineer. The licensed Traffic Engineer attests to the technical information contained therein and has judged the qualifications of any technical specialists providing engineering data from which recommendations, conclusions and decisions are based.

Prepared by:

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## Project Description

This report describes a **Vehicle Miles Traveled (VMT) Analysis** prepared by **JLB Traffic Engineering, Inc.** (JLB) for **Casitas Selma (Project)** located on the southwest quadrant of Highland Avenue and Floral Avenue in the City of Selma. The Project proposes to develop approximately 36.5 net acres with a mix of residential, commercial and park space. For purposes of calculating VMT, this project was divided into three components: Retail, Hotel and Residential. Based on information provided to JLB, the proposed Project is consistent with the City of Selma *General Plan Update 2035*.

## VMT Analysis

### Regulatory Setting and Criteria of Significance

Senate Bill (SB) 743 requires that relevant CEQA analysis of transportation impacts be conducted using a metric known as VMT instead of Level of Service (LOS). VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

The State CEQA Guidelines were amended to implement SB 743, by adding Section 15064.3. Among its provisions, Section 15064.3 confirms that, except with respect to transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, LOS measures of impacts on traffic facilities are no longer a relevant CEQA criteria for transportation impacts.

CEQA Guidelines Section 15064.3(b)(4) states that "[a] lead agency has discretion to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revision to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section."

On November 15, 2021, the City of Selma adopted the Fresno County Council of Governments' (COG) VMT Implementation Regional Guidelines and Technical Report (as it is applicable to the City of Selma), *Fresno County SB 743 Implementation Regional Guidelines*, referred to in this document as the Fresno COG VMT Guidelines. The Fresno COG VMT Guidelines were published in January 2021 and are consistent with the requirements of CEQA Guidelines Sections 15064.3 and 15064.7. The December 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) published by the Governor's Office of Planning and Research (OPR), was utilized as a reference and guidance document in the preparation of the Fresno COG VMT Guidelines.

The Fresno COG VMT Guidelines adopted a screening standard and criteria that can be used to screen out qualified projects that meet the adopted criteria from needing to prepare a detailed VMT analysis. These criteria may be size, location, proximity to transit or trip making potential. In general, development projects that are consistent with the City's General Plan and Zoning and that meet one or more of the following criteria can be screened out from a quantitative VMT analysis.

1. Project Located in a Transit Priority Area/High Quality Transit Corridor (within 0.5 miles of a transit stop)
2. Project is local-serving retail of less than 50,000 square feet
3. Project has a high level of affordable-housing units
4. Project is a low trip generator (Less than 500 average daily trips)
5. Project is located in a low VMT zone
6. Project is an institutional/government and public service uses

This screening tool is consistent with the OPR December 2018 Guidance referenced above. The screening tool includes an analysis of those portions of the city that satisfy the standard of reducing VMT by 13% from existing per capita and per employee VMT averages within the relevant region. The relevant region adopted by the County of Fresno VMT Guidelines is Fresno County.

However, the Fresno COG VMT Guidelines Section 3.1 regarding Development Projects states that "If a project constitutes a General Plan Amendment (GPA) or a Zone Change (ZC), none of the screening criteria may apply." This particular Project does not include a General Plan Amendment; however, none of the screening criteria were met by the Project. As such, a quantitative VMT Analysis will be conducted.

For projects that are not screened out, a quantitative analysis of VMT impacts must be prepared and compared against the adopted VMT thresholds of significance. The Fresno COG VMT Guidelines document includes thresholds of significance for development projects, transportation projects and land use plans. These thresholds of significance were developed using the County of Fresno as the applicable region, and the required reduction of VMT (as adopted in the Fresno COG VMT Guidelines) corresponds to Fresno County's contribution to the statewide GHG emission reduction target. In order to reach the statewide GHG reduction target of 15%, Fresno County must reduce its GHG emissions by 13%. The method of reducing GHG by 13% is to reduce VMT by 13% as well.

VMT is simply the product of a number of trips and those trips' lengths. The first step in a VMT analysis is to establish the baseline average VMT, which requires the definition of a region. The *Fresno County SB 743 Implementation Regional Guidelines* for the City of Selma provide that the Fresno County average VMT per Capita (appropriate for residential land uses) and Employee (appropriate for office/commercial non-retail land uses) are 16.1 and 25.6, respectively. The City's threshold targets a 13% reduction in VMT for residential and office/commercial non-retail land uses.

The City's adopted thresholds for development projects correspond to the regional averages modeled by Fresno COG's ABM. For residential and non-residential (except retail) development projects, the adopted threshold of significance is a 13% reduction. This means that projects that generate VMT in excess of a 13% reduction from the existing regional VMT per capita or per employee would have a significant environmental impact. Projects that reduce VMT by 13% or more are less than significant. The adopted threshold for retail projects is no net increase in Regional VMT when compared to the existing Regional VMT. The adopted threshold for "Other" land use projects is no net increase to the regional VMT per employee.

The threshold for the Residential component is a maximum of  $(16.10 \times (1.00 - 0.13)) = 14.01$  14.01 VMT per capita. The threshold for the Hotel component is a maximum of 25.60 VMT per employee as the Hotel falls under the “Other” land use. The threshold for Retail component is a net zero (0) increase in regional VMT for retail land uses.

## VMT Results

Table I displays the Project VMT per Capita of 23.14 for the Residential component, Table II displays the Project VMT per Employee of 33.64 for the Hotel component and Table III displays the total Regional VMT including the Project of 21,873,921 for the Retail component. Tables I, II and III also display the respective threshold for each Project component. As can be seen in the tables below, the Residential and Hotel components have a significant VMT impact before mitigations, but the Retail component does not have a significant VMT impact.

**Table I: Residential VMT Results**

VMT Measurement	Fresno COG plus Project VMT Results <sup>1</sup>	City of Selma VMT Threshold <sup>2</sup>	Significant VMT Impact Before Mitigations?
VMT / Capita	23.14	14.01	Yes

Note: 1 = VMT Results from Kittelson & Associates per Fresno COG ABM  
 2 = VMT Thresholds and Mitigations per Fresno County SB 743 Implementation Regional Guidelines

**Table II: Hotel VMT Results**

VMT Measurement	Fresno COG plus Project VMT Results <sup>1</sup>	City of Selma VMT Threshold <sup>2</sup>	Significant VMT Impact Before Mitigations?
VMT / Employee	33.64	25.60	Yes

Note: 1 = VMT Results from Kittelson & Associates per Fresno COG ABM  
 2 = VMT Thresholds and Mitigations per Fresno County SB 743 Implementation Regional Guidelines

**Table III: Retail VMT Results**

VMT Measurement	Fresno COG plus Project VMT Results <sup>1</sup>	City of Selma VMT Threshold <sup>2</sup>	Significant VMT Impact Before Mitigations?
Total Regional VMT	21,873,921	21,907,453	No

Note: 1 = VMT Results from Kittelson & Associates per Fresno COG ABM  
 2 = VMT Thresholds and Mitigations per Fresno County SB 743 Implementation Regional Guidelines

## VMT Mitigations

The VMT mitigation measures considered for this Project include those appropriate for the respective land use as noted in the Fresno COG Guidelines. Appendix A presents a summary of the VMT reduction associated with each mitigation measure utilized in this Report. The selected VMT reduction rates appropriate for the Project were based on the *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures* published by the California Air Pollution Control Officers Association (CAPCOA). The mitigation measures include increase density, increase diversity of urban and suburban developments, integrate affordable housing, improve design of development, provide pedestrian network improvements and provide traffic calming measures. These mitigation measures were determined based off of current design parameters

and location. Measures that are considered combined strategies were not included as part of the reductions per CAPCOA guidance.

It is anticipated that the Project will benefit from the effects of internal capture as a result of having a mixture of residential, retail and hotel within the project. The daily percentage of internal capture was calculated for both the Residential and Hotel components. The daily internal capture percentage is estimated to be 17.94% ( $588 / 3,277 * 100 = 17.94\%$ ) for the Residential component and 12.30% ( $118 / 959 * 100 = 12.30\%$ ) for the Hotel component. The percent reduction to VMT from internal capture considers that a portion of estimated internal capture reduction has already been accounted for in the model. The number of trips that were internally captured in the model were subtracted from this percentage. Therefore, the percent reduction to VMT from internally captures trips is estimated to be 13.24% ( $(588 - 154) / 3,277 * 100 = 12.44\%$ ) for the residential component and 5.53% ( $(118-65) / 959 = 5.53\%$ ) for the Hotel component.

As can be seen in Table IV, the mitigation measures result in a reduction of 1.43 VMT per Capita and the internal capture results in a reduction of 3.06 VMT per Capita to the Residential component. As can be seen in Table V, the mitigation measures result in a reduction of 2.27 VMT per Employee and the internal capture results in a reduction of 1.86 VMT per Employee to the Hotel component. After the application of the VMT mitigation measures and internal capture, the Project has a VMT per Capita of 18.65 for the Residential component and a VMT per Employee of 29.51 for the Hotel component. In conclusion, despite reductions from VMT mitigations and internal capture, there are significant VMT impacts associated with the Residential and Hotel components of this Project.

**Table IV: Residential VMT Mitigations**

<i>VMT Measurement</i>	<i>Fresno COG plus Project VMT Results<sup>1</sup></i>	<i>City of Selma VMT Threshold<sup>2</sup></i>	<i>Reduction in VMT from Mitigations<sup>2</sup></i>	<i>Reduction in VMT from Internal Capture</i>	<i>VMT After Mitigations<sup>2</sup></i>	<i>Significant VMT Impact After VMT Mitigations?</i>
VMT / Capita	23.14	14.01	1.43	3.06	18.65	Yes

Note: 1 = VMT Results from Kittelson & Associates per Fresno COG ABM  
 2 = VMT Thresholds and Mitigations per Fresno County SB 743 Implementation Regional Guidelines

**Table V: Hotel VMT Mitigations**

<i>VMT Measurement</i>	<i>Fresno COG plus Project VMT Results<sup>1</sup></i>	<i>City of Selma VMT Threshold<sup>2</sup></i>	<i>Reduction in VMT from Mitigations<sup>2</sup></i>	<i>Reduction in VMT from Internal Capture</i>	<i>VMT After Mitigations<sup>2</sup></i>	<i>Significant VMT Impact After VMT Mitigations?</i>
VMT / Employee	33.64	25.60	2.27	1.86	29.51	Yes

Note: 1 = VMT Results from Kittelson & Associates per Fresno COG ABM  
 2 = VMT Thresholds and Mitigations per Fresno County SB 743 Implementation Regional Guidelines

## Conclusions

- Per the Fresno COG ABM and before internal capture and mitigations, the VMT of the Residential component is projected to be 23.14 VMT per Capita.
- After the mitigations of 1.43 VMT per Capita and internal capture reduction of 3.06 VMT per Capita, the VMT of the Residential component is projected to be 18.65 VMT per capita.
- Therefore, there are significant VMT impacts associated with the non-affordable Residential component of this Project.

- Per the Fresno COG ABM and before internal capture and mitigations, the VMT of the Hotel component is projected to be 33.64 VMT per employee.
- After the mitigations of 2.27 VMT per Employee and internal capture reduction of 1.86, the VMT of the Hotel component is projected to be 29.51 VMT per employee.
- Therefore, there are significant VMT impacts associated with the Hotel component of this Project.
- Per the Fresno COG ABM, the total regional VMT including the Retail component is projected to be 21,873,921 while the total regional VMT excluding the Retail component is projected to be 21,907,453.
- As the total regional VMT including the Retail component is less than the total regional VMT excluding the Retail component, there are no significant VMT impacts associated with the Retail component of this Project.

## Study Participants

### JLB Traffic Engineering, Inc. Personnel

Jose Luis Benavides, PE, TE	Project Manager
Matthew Arndt, EIT	Engineer I/II
Adrian Benavides	Engineering Aide
Carlos Topete	Engineering Aide

### Persons Consulted:

Edward Kashian	Lance-Kashian & Company
Adan Garcia	Lance-Kashian & Company
Philip L. Romero	City of Selma
Trevor Stearns	City of Selma
Hector Luna	Fresno County
David Padilla	Caltrans
Edgar Hernandez	Caltrans
Mike Aronson	Kittelson & Associates, Inc.

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## Appendix A: VMT Output



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## Selma Floral/Highland VMT Summary

	<b>2019</b>		<b>2019</b>	
<b>Regional VMT</b>	<b>w/o Project</b>		<b>Project w/ Retail</b>	<b>Difference</b>
Network	21,666,523		21,619,675	(46,848)
Intrazonal	240,930		254,246	13,316
Total	21,907,453		21,873,921	(33,532)
Daily Trips	5,285,689		5,311,564	25,875
Average Trip Length	4.14		4.12	

\*VMT Output by Kittelson & Associates, Inc. using the Fresno COG ABM

## Existing TAZ VMT Summary

TAZ ID/Zone	2856
-------------	------

### Existing TAZ Demographics

Jurisdiction	Fresno County
Households	600
Population	2,100
Household Size	3.50
Total Employment	-

### VMT per capita

IIVMT_CAP	17.39
IXVMT_CAP	5.74
VMT_CAP	23.14

### VMT per employee

IIVMT_EMP	0.00
XIVMT_EMP	0.00
VMT_EMP	0.00

Notes: Input the TAZ ID in the orange cell to extract TAZ VMT

\*Output by Kittelson Associates, Inc. using the Fresno COG  
ABM

## Existing TAZ VMT Summary

TAZ ID/Zone	2858
-------------	------

### Existing TAZ Demographics

Jurisdiction	Fresno County
Households	-
Population	-
Household Size	#DIV/0!
Total Employment	70

### VMT per capita

IIVMT_CAP	0.00
IXVMT_CAP	0.00
VMT_CAP	0.00

### VMT per employee

IIVMT_EMP	12.66
XIVMT_EMP	20.98
VMT_EMP	33.64

Notes: Input the TAZ ID in the orange cell to extract TAZ VMT

\*Output by Kittelson Associates, Inc. using the Fresno COG  
ABM

## Appendix B: VMT Mitigation Measures



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# Selma Casitas Perea VMT Analysis

		TAZ:	2856	2858
		Land Use:	Residential	Hotel
		Fresno COG VMT Output:	23.14	33.64
		City of Selma VMT Threshold:	14.01	25.60
		% deviation from target threshold:	65.17%	31.41%
Measure	VMT Mitigation	Grouped	VMT Reduction Rate (%)	
<i>Land Use/Location</i>				
LUT-1	Increase Density	N/A	11.13%	3.21%
LUT-2	Increase Location Efficiency	N/A	N/A	N/A
LUT-3	Increase Diversity of Urban and Suburban Developments	N/A	22.24%	22.24%
LUT-4	Increase Destination Accessibility	N/A	19.17%	19.17%
LUT-5	Increase Transit Accessibility	N/A	N/A	N/A
LUT-6	Integrate Affordable and Below Market Rate Housing	N/A	1.20%	N/A
LUT-7	Orient Project Toward Non-Auto Corridor	LUT-3	N/A	N/A
LUT-8	Locate Project near Bike Path/Bike Lane	LUT-4	N/A	N/A
LUT-9	Improve Design of Development	N/A	21.30%	21.30%
Land Use/Location Category VMT Reduction (%)			30.90%	23.83%
Max. Land Use/Location Category VMT Reduction (%)			5.00%	5.00%
<i>Neighborhood/Site Enhancements</i>				
SDT-1	Provide Pedestrian Network Improvements	N/A	2.00%	2.00%
SDT-2	Provide Traffic Calming Measures	N/A	0.25%	0.25%
SDT-3	Implement a Neighborhood Electric Vehicle (NEV) Network	N/A	N/A	N/A
SDT-4	Create Urban Non-Motorized Zones	SDT-1	N/A	N/A
SDT-5	Incorporate Bike Lane Street Design (on-site)	LUT-9	N/A	N/A
SDT-6	Provide Bike Parking in Non-Residential Projects	LUT-9	N/A	N/A
SDT-7	Provide Bike Parking with Multi-Unit Residential Projects	LUT-9	N/A	N/A
SDT-8	Provide Electric Vehicle Parking	SDT-3	N/A	N/A
SDT-9	Dedicate Land for Bike Trails	LUT-9	N/A	N/A
Neighborhood/Site Enhancements Category VMT Reduction (%)			2.25%	2.25%
Max. Neighborhood/Site Enhancements Category VMT Reduction (%)			5.00%	5.00%
<b>Transportation Cross-Category VMT Reduction (%)</b>			<b>7.14%</b>	<b>7.14%</b>
<b>Max. Transportation Cross-Category VMT Reduction (%)</b>			<b>10.00%</b>	<b>10.00%</b>
<b>VMT Mitigation Calculations</b>				
		TAZ:	2856	2858
		Land Use:	Residential	Hotel
		Fresno COG VMT Output:	23.14	33.64
		Internal Capture VMT Reduction:	-3.06	-1.86
		Mitigation VMT Reduction:	-1.43	-2.27
		Project VMT after Mitigations:	18.65	29.51
		City of Selma VMT Threshold:	14.01	25.60
		<b>Target VMT Satisfied?</b>	<b>FALSE</b>	<b>FALSE</b>