Appendix H

901 Levering Student Housing Project

VMT Screening Assessment

Fehr & Peers

Technical Memorandum

Date: September 18, 2025

To: Tina Andersen

From: Sarah Brandenberg

Subject: 901 Levering Avenue Student Housing VMT Screening Assessment

LA25-3596

This technical memorandum documents a Vehicle Miles Traveled (VMT) screening assessment conducted by Fehr & Peers for the proposed UCLA off-campus student housing project (the "Project") located at 901 Levering Avenue in the City of Los Angeles. The Governor's Office of Land Use and Climate Innovation (LCI) *Technical Advisory on Evaluating Transportation Impacts in California Environmental Quality Act (CEQA)* (December 2018) was used as a guide for a qualitative Vehicle Miles Traveled (VMT) assessment for the proposed Project. The Project description estimated trip generation, and results of the VMT assessment are described in further detail below.

Project Description

The Project is located on Levering Avenue, between the cross streets of Le Conte Avenue and Gayley Avenue, which places the Project adjacent to the UCLA campus border. The Project would replace five existing buildings housing 42 residential units (52 beds) with a single building comprised of up to 1,150 beds in 148 apartment-style residential units, including supporting amenities. Parking would only be provided for UCLA Housing service vehicles off Levering Avenue.

Trip Generation

The number of vehicle trips generated by the Project was estimated based on the current edition (12th Edition) of the ITE Trip Generation Manual. Given the characteristics of the housing uses, the trip generation rates for Off-Campus Student Apartment (Mid-Rise) located within a Multi-Use Urban location were applied to the proposed number of beds. ITE provides a range of trip generation rates for various multi-family housing land uses ranging from low-rise to high-rise, with high-rise housing generating fewer trips on a per unit basis due to the higher density of the project site. Since ITE does not provide a daily trip generation rate for Off-Campus Student Apartment

(High-Rise), the mid-rise trip generation rate was applied to the proposed Project and provides a conservative analysis.

Table 1 presents the trip generation rates used to estimate the daily and peak-hour vehicle trip generation for the Project. As shown, a Transportation Demand Management (TDM) credit was also applied to the proposed Project to account for the elimination of on-site residential automobile parking. The TDM credit was based the City of Los Angeles Department of Transportation (LADOT) *Transportation Assessment Guidelines* (the "TAG") (August 2022) that provide guidance on trip reduction measures, such as parking reductions, and their benefit on reducing travel demand. The estimated trip generation is conservative when considering that the Project site is located within walking distance of the UCLA campus, Westwood Village, and numerous high-quality transit connections, including multiple nearby bus stops and the Metro D Line Westwood/UCLA Station scheduled to open in 2027 prior to completion of the Project, as discussed further below.

The existing multi-family housing units on the Project site were applied as a trip credit to account for travel demand that would no longer occur. As shown, the Project is anticipated to generate 1,249 net new daily vehicle trips, with 73 new AM peak hour trips and 119 new PM peak hour trips.

Table 1. Project Trip Generation Summary

Unit Type	Amount	Daily Rate[1]	Daily Trips	AM Peak Hour Rate[1]	AM Peak Hour Trips	PM Peak Hour Rate[1]	PM Peak Hour Trips
Project							
Student Beds	1150	1.50	1,725	0.09	104	0.14	161
TDM Adjustment[2]			-216	-	-13	-	-20
Total Project Vehicle Trips			**1,509**	-	**91**	-	**141**
Existing Uses							
Apartment Units	42	6.21	-261	0.41	-17	0.52	-22
Net New Vehicle Trip Generation	**-**	**-**	**1,249**	**-**	**73**	**-**	**119**

Note:

1. Trip generation rates based on Trip Generation, 12th Edition, Institute of Transportation Engineers (ITE). Project trip generation based on ITE 226: Off-Campus Student Apartment (Mid-Rise); Dense Multi-Use Urban Setting based on the number of proposed beds. Existing land use trip generation based on ITE 220: Multifamily Housing (Low-Rise) based on the number of existing units.
2. Transportation Demand Management (TDM) adjustment of 12.5% applied based on LADOT Transportation Assessment Guidelines.

Source: Fehr & Peers, 2025.

VMT Assessment

The following sections describe relevant considerations for conducting a VMT assessment, including an initial screening of projects to determine whether a determination of less-than-significant VMT impact can be readily made, or if a more extensive evaluation of VMT-related transportation impacts is necessary to determine the potential for significant impacts.

Regulatory Context

On September 27, 2013, Governor Jerry Brown signed SB 743 into law, which initiated a process to change transportation impact analyses completed in support of California Environmental Quality Act (CEQA) documentation. SB 743 eliminates the vehicular level of service (LOS) as a basis for determining significant transportation impacts under CEQA and provides a new performance metric, VMT. As a result, the State has shifted from measuring a project's impact to drivers (LOS) to measuring the impact of driving (VMT) as it relates to achieving State goals of reducing greenhouse gas (GHG) emissions, encouraging infill development, and improving public health by promoting active transportation. To help lead agencies with SB 743 implementation, LCI produced a *Technical Advisory* that provides recommendations on VMT impact thresholds and considerations on the level of VMT analysis that is required based on Project characteristics.

VMT Impact Analysis

The first step of a VMT analysis is to determine what type of analysis, if any, is needed. LCI's *Technical Advisory* suggests three screening criteria that agencies can use to identify if a proposed project is expected to cause a less than significant impact without conducting a detailed study: project size, project accessibility to transit, and project location in a low VMT area. Given the size of the Proposed project, the latter two screening criteria are relevant to assess if a VMT analysis would be required for the proposed Project. The applicable screening criteria are detailed below and applied for each component of the Project to determine if the Project has the potential to result in a VMT impact.

Transit Priority Area (TPA) Screening

Projects located in proximity to a major transit stop or along a high-quality transit corridor may be screened out from conducting a VMT analysis due to their location in a transit priority area (TPA) because they are presumed to have a less than significant impact absent substantial evidence to the contrary. The California Public Resources Code defines these two terms as follows:

- Major transit stop (CA Public Resource Code, §21064.3)
  - An existing rail or bus rapid transit station.
  - A ferry terminal served by either a bus or rail transit service.

  - The intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods. *(This definition was amended from 15 minutes to 20 minutes as of January 2025.)*

- High-quality transit corridor (CA Public Resource Code, §21155)
  - A corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

LCI's *Technical Advisory* states that a project can be presumed to have a less-than-significant impact near transit stations if it satisfies CEQA Guidelines Section 15064.3(b)(1) of being located within one-half mile of a major transit stop or an existing stop along a high-quality transit corridor.

Multiple transit agencies provide transit service in the Project vicinity. LA Metro is the primary transit provider with the largest number of bus routes and stops in close proximity to the Project site. Santa Monica Big Blue Bus, Culver CityBus, Antelope Valley Transit Authority, City of Santa Clarita Transit, Amtrak, and LADOT also provide transit service within the Project vicinity. BruinBus, operated by UCLA, provides complimentary service between the UCLA campus and Westwood Village. The U1 Weyburn route serves the southwest campus with a stop on Le Conte Avenue just east of the Project site, and service is provided approximately every 10 to 20 minutes. Additionally, LA Metro is currently constructing the D Line subway extension which will add two new stations (Westwood/UCLA and Westwood/VA Hospital) that will connect the area to downtown Los Angeles. The Westwood/UCLA station will be located approximately 0.35 mile from the Project site and is expected to open in 2027.

The existing LA Metro bus routes and stops within one-half mile of the Project site were reviewed to determine if the service frequencies were 15 minutes or less during peak travel hours. Based on existing transit service, the Project site meets the definition of being in a TPA as shown in **Table 2, Table 3** and **Figure 1**.

Table 2. LA Metro Transit Service in Project Vicinity

Bus Stops Closest to Project Site	Bus Routes	Distance from Project Site[1] (miles)
Le Conte / Gayley	2, 602	0.06
Westwood / Le Conte	2, 233, 602, 761	0.21
Wilshire / Veteran	20, 720	0.35

Note:
1. Euclidean distance measured from bus stop to edge of project site parcel.

Table 3. LA Metro Transit Service Frequencies in Project Vicinity

Bus Route	Headway at Weekday Peak (minutes)
2	8
20	10
233	NA[1]
602	30
720	5
761	15

Note:
1. Overnight service in Westwood.

Figure 1 illustrates each of the LA Metro transit routes and shows the stops within one-half mile of the Project site. As shown in the tables and figure, multiple bus stops are located within one-half mile of the Project site with service by six LA Metro bus routes. There are several major transit stops located within one-half mile of the Project site, including at Westwood Boulevard/Le Conte Avenue where Bus Routes 2 and 761 intersect and offer service intervals of 15 minutes or less during the peak commute periods. Additionally, the Project site is in proximity (less than one-half mile) to several bus stops on high-quality transit corridors such as Westwood Boulevard, Wilshire Boulevard, and Le Conte Avenue.

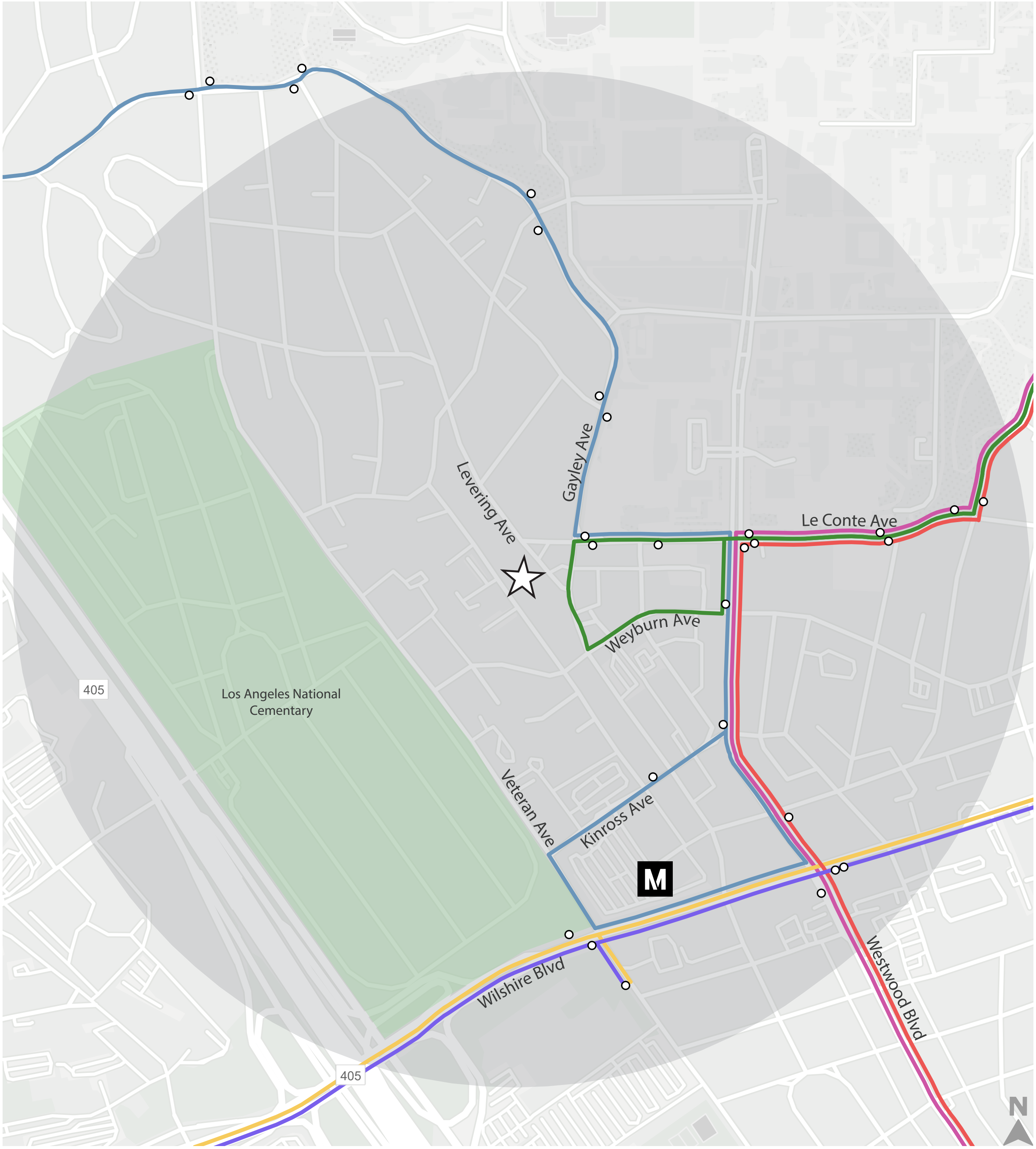
The project-specific characteristics that the LCI *Technical Advisory* recommends for consideration for transit proximity screening are documented in **Table 4**.

Table 4. Additional Considerations for Transit Proximity Screening

LCI Considerations	Project Site Characteristics	LCI Guidance Met?
Floor Area Ratio (FAR) above 0.75?	FAR of 9.6[1]	Yes
More parking than required by the jurisdiction?	Project is not providing student parking.	Yes
Consistent with the applicable Sustainable Communities Strategy?	SCAG's Connect SoCal 2024 plan encourages new housing and transit-oriented development. The proposed housing will be constructed within a TPA, with surrounding mixed uses to limit vehicle trips and encourage walking, biking, and transit.	Yes
Replaces affordable residential units?	The Project is not removing any affordable housing as none exists on-site.	Yes

Note:
1. FAR calculated based on 0.74 acre site and 310,000 square foot building.

As summarized above, the characteristics of the Project site meet the guidance provided by LCI for a project to be screened from further VMT analysis if it is located in a TPA. Therefore, the Project site qualifies as being located in a TPA, which means that the Project is presumed to have a less than significant VMT impact and can be screened out from further VMT analysis.



LA Metro Bus Routes
- 2
- 20
- 233
- 602
- 720
- 761

Project Site

1/2 Mile Buffer from Project Site

Future D Line Subway Station

Bus Stops

Figure 1

Transit Service in Project Vicinity

Low VMT Area Screening

Although the Project meets VMT screening for being located in a TPA, further analysis was conducted to determine if the site is located in a low VMT generating area. The LCI *Technical Advisory* states that projects located within a low VMT generating area may be presumed to have a less than significant impact, absent substantial evidence to the contrary. A low VMT generating area generally has higher density, a mix of land uses, and provides opportunities for people to walk to nearby uses instead of driving. Low VMT areas are defined as areas that generate VMT below the VMT threshold. Based on the VMT impact threshold recommended by LCI, low VMT is defined as an area that generates VMT on a per capita basis that is 15% or more below the baseline VMT.

To determine if the Project site is located in a low VMT area, VMT data from the 2024 SCAG Regional Travel Demand Forecasting Model[1] was obtained for the Project site and for the SCAG region. Given that the Project includes student housing uses, Home-Based VMT per Capita is the appropriate VMT metric and was obtained from the SCAG model. For residential land uses, home-based vehicle trips are traced back to the residence of the trip-maker (non-home-based trips are excluded) and then divided by the residential population within the geographic area to produce Home-Based VMT per Capita.

In the SCAG region, a low VMT area for residential uses generates no more than 14.92 Home-Based VMT per Capita[2]. For residential uses in the SCAG traffic analysis zone that represents the Project site, the Home-Based VMT per Capita is 11.44 VMT per capita, which is 23% below the baseline VMT (see **Attachment A** for the SCAG model TAZ boundary). Therefore, the Project site qualifies as a low VMT area, which means that the Project is presumed to have a less than significant VMT impact and can be screened out from further VMT analysis.

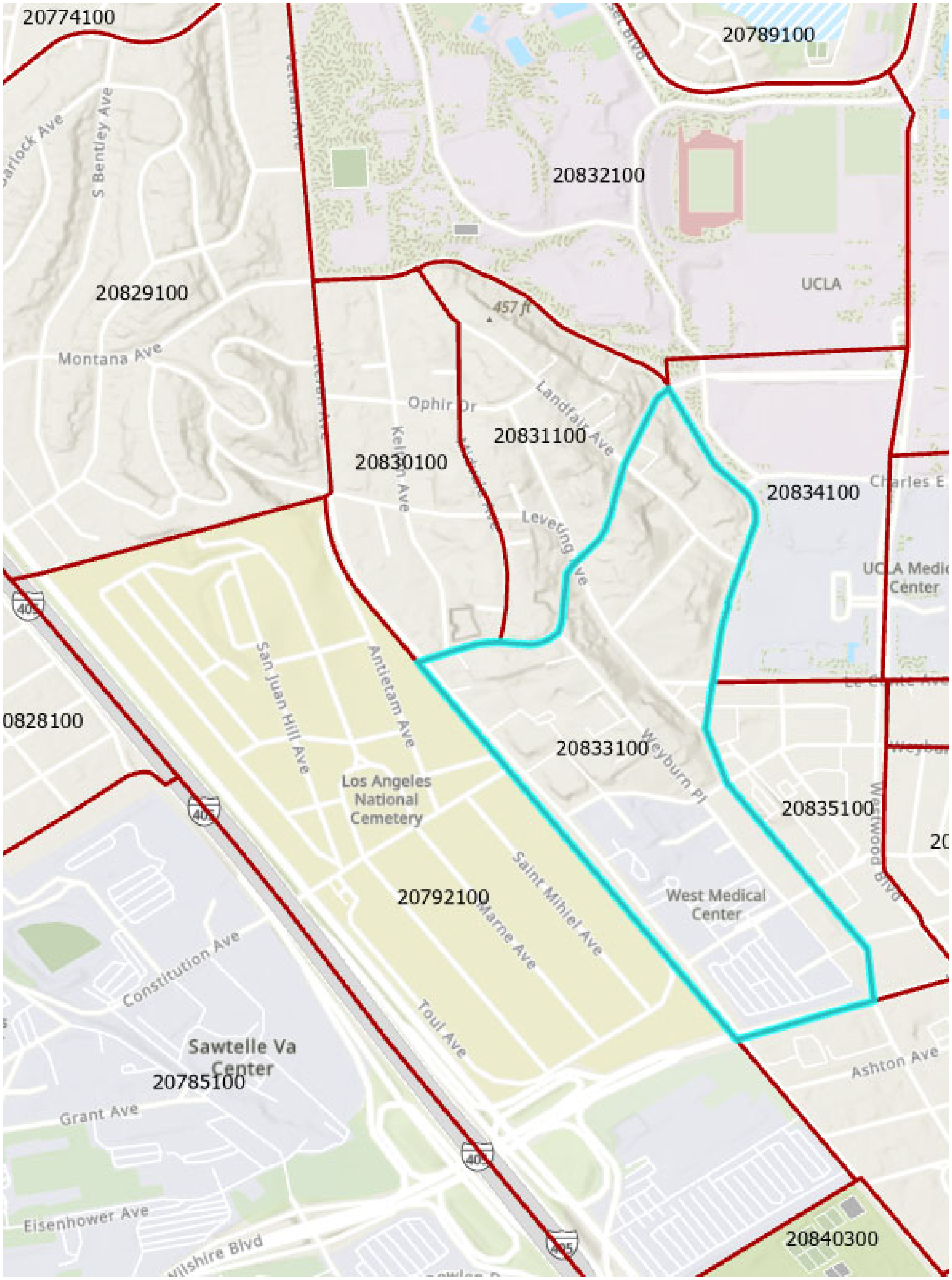
Conclusions

The proposed UCLA off-campus student housing project at 901 Levering Avenue would replace existing residential uses with up to 1,150 beds in 148 apartment-style residential units. This VMT assessment focuses on screening the Project from VMT analysis based on its location within a Transit Priority Area (TPA) and low VMT area. As detailed above, the Project site is located within one-half mile of several major transit stops offering service intervals of 15 minutes or less during peak commute periods, as well as bus stops along multiple high-quality transit corridors. Additionally, the Project area’s Home-Based VMT per capita is 23% lower than the SCAG region, which qualifies it as a low VMT area.

Based on CEQA guidance and the LCI *Technical Advisory*, the proposed Project meets VMT screening criteria for being located within a TPA and a low VMT area. Therefore, the Project is presumed to have a less than significant VMT impact and no further quantitative analysis of VMT is required.

1 Southern California Association of Governments, Regional Travel Demand Model (2024).
2 The 2024 SCAG Model was utilized to calculate the Home-Based VMT per Capita.

Attachment A - SCAG Model Traffic Analysis Zones (TAZs) in Project Area



Note: TAZ 20833100 contains the Project site.