Appendix G

# VMT Analysis

Kimley»Horn

# Memorandum

**To:** Lindsey Hashimoto, Principal Environmental Planner
Campus Planning & Sustainability
University of California Irvine

**From:** Chris Gregerson, P.E., T.E., AICP,
Tyler Mickelson
Kimley-Horn and Associates, Inc.

***Re:*** *East Campus Student Apartments Phase 5 – Vehicle Miles Traveled (VMT) Analysis*
Irvine, California

**Date:** March 25, 2026

This memorandum documents a Vehicle Miles Traveled ("VMT") analysis completed for the proposed student housing development project ("Project" or "proposed Project") consisting of two sites (Site A and Site B) on the University of California, Irvine (UCI) East Campus in Irvine, CA. The proposed Project would construct two (2) new residential housing buildings between the two sites for undergraduate students. Site A is approximately 1.75 acres located at the southwestern corner of the Campus Drive and California Avenue intersection, while Site B is approximately 1.5 acres located at the southeast corner of the Campus Drive and East Peltason Drive intersection. The proposed Project would provide up to 1,100 beds across the two sites.

With the passage of SB 743, VMT has become an important indicator for determining if new development will result in a "significant transportation impact" under the California Environmental Quality Act (CEQA). This memorandum summarizes the VMT analysis and resultant findings for the combined sites within the proposed Project.

## Purpose of Analysis

SB 743 is part of a long-standing policy effort by the California legislature to improve California's sustainability and reduce greenhouse gas emissions through denser infill development, a reduction in single occupancy vehicles, improved mass transit, and other actions. Recognizing that the current environmental analysis techniques are, at times, encouraging development that is inconsistent with this vision, the legislature has taken the extraordinary step to change the basis of environmental analysis for transportation impacts from Level of Service (LOS) to Vehicle Miles Travelled (VMT). VMT is understood to be a good proxy for evaluating Greenhouse Gas (GHG) and other transportation related impacts that the State is actively trying to address.

In January 2019, the Natural Resources Agency finalized updates to the CEQA Guidelines including the incorporation of SB 743 modifications. The Guidelines' changes were approved by the Office of Administrative Law and are now in effect. The provisions apply statewide as of July 1, 2020. To help aid lead agencies with SB 743 implementation, the Governor's Office of Planning and Research (OPR), currently named the Governor's Office of Land Use and Climate Innovation (LCI), produced the Technical Advisory on Evaluating Transportation Impacts in CEQA[1] (December 2018) that provides guidance

[1] *Technical Advisory on Evaluating Transportation Impacts in CEQA.* Governor's Office of Planning and Research State of California. December 2018.

regarding the variety of implementation questions they face with respect to shifting to a VMT metric. Key guidance from this document includes:

- VMT is the most appropriate metric to evaluate a project's transportation impact.
- OPR recommends tour- and trip-based travel models to estimate VMT but ultimately defers to local agencies to determine the appropriate tools.
- OPR recommends measuring VMT for residential and office projects on a "per rate" basis.
- OPR states that by adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Generally, retail development including stores smaller than 50,000 square-feet might be considered local serving.
- OPR recommends that where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply.
- Lead agencies have the discretion to set or apply their own significance thresholds.

While the UCI is acting as its own lead agency with the discretion to set its own significance thresholds, for the purpose of this analysis UCI has elected to use the thresholds of significance established by the City of Irvine in lieu of its own standard. In March 2023, the City of Irvine released an update to their Traffic Study Guidelines[2] that was established for use in the implementation of SB 743 within the City. The update to the City's Guidelines included screening criteria that allow projects with certain characteristics to be presumed to have a less than significant VMT impact. These screening criteria include:

- CEQA Addendum – if a project is a part of an addendum to a certified EIR and can demonstrate it is not subject to VMT analysis.
- Small Project – if a project results in a net increase of 250 or less weekday daily trips
- Transit Priority Area – if a project is located within half-mile distance of existing rail transit station or located within half-mile of two or more existing bus routes with a frequency of service interval of 15 minutes or less during morning and evening peak hours
- Affordable Housing – if a project is proposing 100 percent restricted affordable housing units
- Local-Serving Use – if the project is local serving in land use type defined as 100,000 square feet or less of retail, a daycare or public-school serving K-12.

## Methodology and Assumptions

The student housing Project does not meet the criteria for the following screening categories based on the proposed use type and corresponding Tiered IS/MND CEQA documentation; CEQA Addendum, Affordable Housing project, or Local-Serving Use.

Based on the screening criteria noted above, this analysis compares the proposed Project against the Small Project category and Transit Priority Area category, to determine if the Project can be screened out from further VMT analysis and presumed to have a less than significant impact on VMT.

[2] *Traffic Study Guidelines*. City of Irvine. March 21, 2023.

Trip generation for the proposed Project was estimated using rates from the UCI Long Range Development Plan (LRDP) Traffic Study[3] which reports the then current daily trip generation rates used in the UCI Main Campus Traffic Model. **Table 1** below shows the relevant land use and trip rates from the UCI LRDP Traffic Study used as a basis for trip generation.

Consistent with previous traffic studies for undergraduate housing[4], the daily trip generation rate for single undergrad housing was reduced by the average observed permit take rate for similar UCI housing developments. The permit take rate is the proportion of UCI undergraduate housing residents who own a vehicle and purchase a residential parking permit. American Campus Communities (ACC) currently manages six properties that provide housing to UCI undergraduate and graduate students. ACC provided data showing that of the 7,683 residents, there are 3,160 active parking permits, which is an average permit take rate of 41-percent. The permit take rate is applied in **Table 2** below.

**Table 1** –UCI Main Campus Traffic Model Trip Generation Rates

| Use | Unit | Rate A | Rate B | Rate A Definition | Rate B Definition |
|---|---|---|---|---|---|
| UCI Staff | PER | 0.84 | 1.90 | Proportion of commuters | Person trips/commuters |
| Single Undergrad Housing | BED | 1.60 | 0.10 | Non-Academic Vehicle trips (Off-Campus) | Internal Academic vehicle trips (On-Campus) |

Source: Rows 3 and 10 from Table A-1 of the UCI LRDP 2007 Update Traffic Study (pg. A-2 or pdf pg. 100).

A Transit Priority Area is defined by the City of Irvine Traffic Study Guidelines as a project located within one-half mile of an existing rail transit station or located within one-half mile of two or more existing bus routes with a frequency of service interval of 15-minutes or less during the morning and evening peak hours. In addition, the development located in a Transit Priority Area must not:

- Have a Floor Area Ratio (FAR) less than 0.75;
- Include more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Be inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization; or
- Replace affordable residential units with a smaller number of moderate, or high-income residential units.

As noted above, a Transit Priority Area, can be defined by a project located within one-half mile of two or more existing bus routes with a frequency of service interval of 15-minutes or less during the morning and evening peak hours. This analysis focuses on the Anteater Express, UCI's bus transit system, route maps and published service schedules to determine whether the Project falls within a Transit Priority Area. The Anteater Express is a UCI transit system that provides less than 15-minute headways on all three lines (A, M and N) between the hours of 7:00 AM and 7:00 PM, see **Exhibit 1** and **Exhibit 2** below. Therefore, the screening must show that the proposed Project is within one-half mile of Anteater Express routes A, M and N and does not conflict with any exceptions listed above.

[3] *Long Range Development Plan 2007 Update Traffic Study*. University of California, Irvine. May 2007.
[4] *Mesa Court Residence Hall Expansion Project Transportation Analysis*. Stantec Consulting Services Inc. November 2022.

## Screening Analysis Results

### *Small Project*

As shown in Table 2 below, the proposed Project is estimated to generate 796 daily trips which is greater than the 250 daily trip threshold for Small Project screening criteria. Therefore, the Project cannot be presumed to have a less than significant VMT impact on the basis of Small Project screening criteria.

Table 2 –Proposed Project Estimated Daily Trip Generation

| Trip Generation Calculation | Results |
|---|---|
| ***Single Undergraduate Housing*** | |
| A) Number of Proposed Beds | 1,100 |
| B) Rate A Off Campus Daily Trip Generation Rate per bed[1] | 1.60 |
| C) Rate B On Campus Daily Trip Generation Rate per bed[1] | 0.10 |
| D) Observed Permit Take Rate | 0.41 |
| ***UCI Staff*** | |
| E) Number of UCI Staff who work at the Project | 20 |
| F) Rate A Portion of Staff Commuting | 0.84 |
| G) Rate B Staff Daily Person Trip Generation Rate | 1.9 |
| H) Average Staff Vehicle Occupancy | 1.1 |
| **Total Daily Trips Generated A*(B+C)*D + E*(F*G/H)** | **796** |

Note: As shown above in Table 1, Single Undergraduate Housing land use Rate A is 1.60 and Rate B is 0.10, with the permit take rate of 0.41 applied, the above Rate A and Rate B trip rates were derived.

### *Transit Priority Area*

As shown in Exhibit 1 the proposed Project sites would be considered in a Transit Priority Area. Specifically, Anteater Express lines A, M, and N all run along Campus Drive with the nearest stops less than 800 feet away. These three lines meet the City's definition of a Transit Priority Area in that they provide less than 15-minute headways during the peak hours of the day, see Exhibit 2 below.

As listed above, the Transit Priority Area screening criteria also identifies additional criteria which could exclude a project from screening out of additional analysis:

- The proposed Project would be designed to have a FAR of no less than 0.75.
- The proposed Project does not include any on-site long-term parking for student residents, nor does UCI establish a minimum parking requirement. Therefore, parking provided would be consistent with campus parking model and principles that balance supply with reduced vehicle travel and would not supply more parking than required by the jurisdiction.
- The Project would also be consistent with the applicable sustainable communities strategy, as it is consistent with the Southern California Association of Governments RTP/SCS by concentrating student housing within a high-intensity activity center, supporting reduced VMT and sustainable growth, and providing access to academic, employment, and service uses consistent with the "15-minute community" concept.
- The Project would not replace affordable residential units with a smaller number of moderate- or high-income units, as no existing housing would be displaced.

Therefore, based on all of the qualifying details listed above, the Project can be screened out from further VMT analysis and is presumed to have a **less than significant impact on VMT** on the basis of meeting all screening criteria for a project located in a Transit Priority Area.

## Findings

Based on the results of this analysis, the following findings are made:

- Based on trip generation rates established in the UCI Main Campus Traffic Model, the proposed Project is expected to generate 796 daily trips.
- The proposed Project is located within the Anteater Express (UCI Transit service) Transit Priority Area, as defined by the City of Irvine Traffic Study Guidelines, and meets all additional criteria requirements. Thus, the proposed Project is presumed to have a **less than significant VMT impact**.

## Attachments:

**Exhibit 1** – Anteater Express Transit Priority Area
**Exhibit 2** - Anteater Express Transit Schedule

Exhibit 1

# Anteater Express Transit Priority Area




Kimley»Horn

*Exhibit 1*
*Anteater Express Transit Priority Area*

Exhibit 2

# Anteater Express Transit Schedule

# A Line: Monday - Thursday

| UNIVERSITY CENTER, NORTH | CALIFORNIA - CAMPUS | ARROYO VISTA HOUSING | CDS HOUSING STOP #1 | CDS HOUSING STOP #2 | CDS HOUSING STOP #3 | VDC HOUSING STOP #1 | VDC HOUSING STOP #2 | PUERTA DEL SOL, NORTH |
|---|---|---|---|---|---|---|---|---|
| STOP No. 107 | STOP No. 108 | STOP No. 109 | STOP No. 110 | STOP No. 111 | STOP No. 112 | STOP No. 103 | STOP No. 104 | STOP No. 113 |
| | | 1st Departure: 7:20 AM | 1st Departure: 7:22 AM | 1st Departure: 7:22 AM | 1st Departure: 7:22 AM | 1st Departure: 7:25 AM | 1st Departure: 7:25 AM | 1st Departure: 7:31 AM |
| 1st Departure: 7:38 AM | 1st Departure: 7:42 AM | | | | | | | |
| | | a bus every 8 minutes | | | | | | |
| | | 10:13 AM | 10:16 AM | 10:16 AM | 10:16 AM | 10:20 AM | 10:20 AM | 10:26 AM |
| 10:33 AM | 10:37 AM | | | | | | | |
| | | a bus every 13 minutes | | | | | | |
| Last Departure: 6:53 PM | Last Departure: 6:57 PM | Last Departure: 6:58 PM | Last Departure: 7:01 PM | Last Departure: 7:01 PM | Last Departure: 7:01 PM | Last Departure: 7:05 PM | Last Departure: 7:05 PM | Last Departure: 7:11 PM |

: Buses will not leave prior to their listed departure time. Timed Stops are identified with a clock at the top of their respective columns.

***SERVICE CONTINUES, PLEASE SEE THE "H LINE" FOR FURTHER INFORMATION AND TIMES***

***No Service on the following dates/holidays: (Jan 19 & Feb 16)***

Schedule for Jan 5, 2026 - Mar 20, 2026
Produced by **Anteater Express**

Updated: 12/12/2025
(949) 824-5547

# A Line: Friday

| UNIVERSITY CENTER, NORTH | CALIFORNIA - CAMPUS | ARROYO VISTA HOUSING | CDS HOUSING STOP #1 | CDS HOUSING STOP #2 | CDS HOUSING STOP #3 | VDC HOUSING STOP #1 | VDC HOUSING STOP #2 | PUERTA DEL SOL, NORTH |
|---|---|---|---|---|---|---|---|---|
| STOP No. 107 | STOP No. 108 | STOP No. 109 | STOP No. 110 | STOP No. 111 | STOP No. 112 | STOP No. 103 | STOP No. 104 | STOP No. 113 |
| | | 1st Departure: 7:20 AM | 1st Departure: 7:22 AM | 1st Departure: 7:22 AM | 1st Departure: 7:22 AM | 1st Departure: 7:25 AM | 1st Departure: 7:25 AM | 1st Departure: 7:31 AM |
| 1st Departure: 7:38 AM | 1st Departure: 7:42 AM | | | | | | | |
| | | a bus every 8 minutes | | | | | | |
| | | 10:13 AM | 10:16 AM | 10:16 AM | 10:16 AM | 10:20 AM | 10:20 AM | 10:26 AM |
| 10:33 AM | 10:37 AM | | | | | | | |
| | | a bus every 13 minutes | | | | | | |
| Last Departure: 3:45 PM | Last Departure: 3:49 PM | Last Departure: 3:50 PM | Last Departure: 3:53 PM | Last Departure: 3:53 PM | Last Departure: 3:53 PM | Last Departure: 3:57 PM | Last Departure: 3:57 PM | Last Departure: 4:03 PM |

: Buses will not leave prior to their listed departure time. Timed Stops are identified with a clock at the top of their respective columns.

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Updated: 12/12/2025
(949) 824-5547

# M Line: Monday - Thursday

| UNIVERSITY CENTER, SOUTH | PUERTA DEL SOL, SOUTH | EAST CAMPUS HOUSING | CALIFORNIA AVE. - ADOBE CR. SOUTH | PALO VERDE HOUSING | ENGINEERING | PHYSICAL SCIENCES, MSTB | W. PELTASON DR. - BISON | W. PELTASON DR. - ACADEMY WAY | BREN EVENTS CENTER - CRAWFORD HALL | HUMANITIES & FINE ARTS, SOUTH |
|---|---|---|---|---|---|---|---|---|---|---|
| STOP No. 100 | STOP No. 137 | STOP No. 158 | STOP No. 159 | STOP No. 160 | STOP No. 161 | STOP No. 162 | STOP No. 163 | STOP No. 164 | STOP No. 165 | STOP No. 166 |
| 1st Departure: 7:45 AM | 1st Departure: 7:28 AM | 1st Departure: 7:31 AM | 1st Departure: 7:32 AM | 1st Departure: 7:33 AM | 1st Departure: 7:35 AM | 1st Departure: 7:37 AM | 1st Departure: 7:39 AM | 1st Departure: 7:40 AM | 1st Departure: 7:40 AM | 1st Departure: 7:42 AM |
| | | a bus every 8 minutes | | | | | | | | |
| 6:43 PM | 6:44 PM | 6:23 PM | 6:24 PM | 6:25 PM | 6:27 PM | 6:31 PM | 6:33 PM | 6:34 PM | 6:34 PM | 6:38 PM |
| | | a bus every 13 minutes | | | | | | | | |
| 7:55 PM | 7:56 PM | 7:35 PM | 7:36 PM | 7:37 PM | 7:39 PM | 7:43 PM | 7:45 PM | 7:46 PM | 7:46 PM | 7:50 PM |
| | | a bus every 25 minutes | | | | | | | | |
| Last Departure: 10:30 PM | Last Departure: 10:31 PM | Last Departure: 10:05 PM | Last Departure: 10:06 PM | Last Departure: 10:07 PM | Last Departure: 10:09 PM | Last Departure: 10:13 PM | Last Departure: 10:15 PM | Last Departure: 10:16 PM | Last Departure: 10:16 PM | Last Departure: 10:20 PM |

: Buses will not leave prior to their listed departure time. Timed Stops are identified with a clock at the top of their respective columns.

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Schedule for Jan 5, 2026 - Mar 20, 2026
Produced by **Anteater Express**

Updated: 12/12/2025
(949) 824-5547

# M Line: Friday

| UNIVERSITY CENTER, SOUTH | PUERTA DEL SOL, SOUTH | EAST CAMPUS HOUSING | CALIFORNIA AVE. - ADOBE CR. SOUTH | PALO VERDE HOUSING | ENGINEERING | PHYSICAL SCIENCES, MSTB | W. PELTASON DR. - BISON | W. PELTASON DR. - ACADEMY WAY | BREN EVENTS CENTER - CRAWFORD HALL | HUMANITIES & FINE ARTS, SOUTH |
|---|---|---|---|---|---|---|---|---|---|---|
| STOP No. 100 | STOP No. 137 | STOP No. 158 | STOP No. 159 | STOP No. 160 | STOP No. 161 | STOP No. 162 | STOP No. 163 | STOP No. 164 | STOP No. 165 | STOP No. 166 |
| 1st Departure: 7:45 AM | 1st Departure: 7:28 AM | 1st Departure: 7:31 AM | 1st Departure: 7:32 AM | 1st Departure: 7:33 AM | 1st Departure: 7:35 AM | 1st Departure: 7:37 AM | 1st Departure: 7:39 AM | 1st Departure: 7:40 AM | 1st Departure: 7:40 AM | 1st Departure: 7:42 AM |
| | | a bus every 8 minutes | | | | | | | | |
| 4:05 PM | 4:06 PM | 3:45 PM | 3:46 PM | 3:47 PM | 3:49 PM | 3:53 PM | 3:55 PM | 3:56 PM | 3:56 PM | 4:00 PM |
| | | a bus every 25 minutes | | | | | | | | |
| Last Departure: 7:30 PM | Last Departure: 7:31 PM | Last Departure: 7:05 PM | Last Departure: 7:06 PM | Last Departure: 7:07 PM | Last Departure: 7:09 PM | Last Departure: 7:13 PM | Last Departure: 7:15 PM | Last Departure: 7:16 PM | Last Departure: 7:16 PM | Last Departure: 7:20 PM |

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(949) 824-5547

# N Line: Monday - Thursday

| UNIVERSITY CENTER, NORTH | VDCN HOUSING STOP #1 | VDCN HOUSING STOP #2 | VDCN HOUSING STOP #3 | PLAZA VERDE DROP OFF ONLY | PUERTA DEL SOL, NORTH |
|---|---|---|---|---|---|
| STOP No. 107 | STOP No. 118 | STOP No. 124 | STOP No. 125 | | STOP No. 113 |
| 1st Departure: 7:35 AM | 1st Departure: 7:21 AM | 1st Departure: 7:21 AM | 1st Departure: 7:21 AM | | 1st Departure: 7:27 AM |
| a bus every 7 minutes | | | | | |
| 3:55 PM | 4:01 PM | 4:01 PM | 4:01 PM | | 4:07 PM |
| a bus every 10 minutes | | | | | |
| Last Departure: 6:55 PM | Last Departure: 7:01 PM | Last Departure: 7:01 PM | Last Departure: 7:01 PM | | Last Departure: 7:07 PM |

: Buses will not leave prior to their listed departure time. Timed Stops are identified with a clock at the top of their respective columns.

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Produced by **Anteater Express**

Updated: 12/12/2025
(949) 824-5547

# N Line: Friday

| UNIVERSITY CENTER, NORTH | VDCN HOUSING STOP #1 | VDCN HOUSING STOP #2 | VDCN HOUSING STOP #3 | PLAZA VERDE DROP OFF ONLY | PUERTA DEL SOL, NORTH |
|---|---|---|---|---|---|
| STOP No. 107 | STOP No. 118 | STOP No. 124 | STOP No. 125 | | STOP No. 113 |
| 1st Departure: 7:35 AM | 1st Departure: 7:21 AM | 1st Departure: 7:21 AM | 1st Departure: 7:21 AM | | 1st Departure: 7:27 AM |
| a bus every 7 minutes | | | | | |
| Last Departure: 3:48 PM | Last Departure: 3:54 PM | Last Departure: 3:54 PM | Last Departure: 3:54 PM | | Last Departure: 4:00 PM |

: Buses will not leave prior to their listed departure time. Timed Stops are identified with a clock at the top of their respective columns.

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