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VEHICLE MILES TRAVELED ASSESSMENT

RIO VISTA APARTMENTS

**Brawley, California
September 22, 2025**

LLG Ref. 3-25-4083

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APPENDIX

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1.0 INTRODUCTION

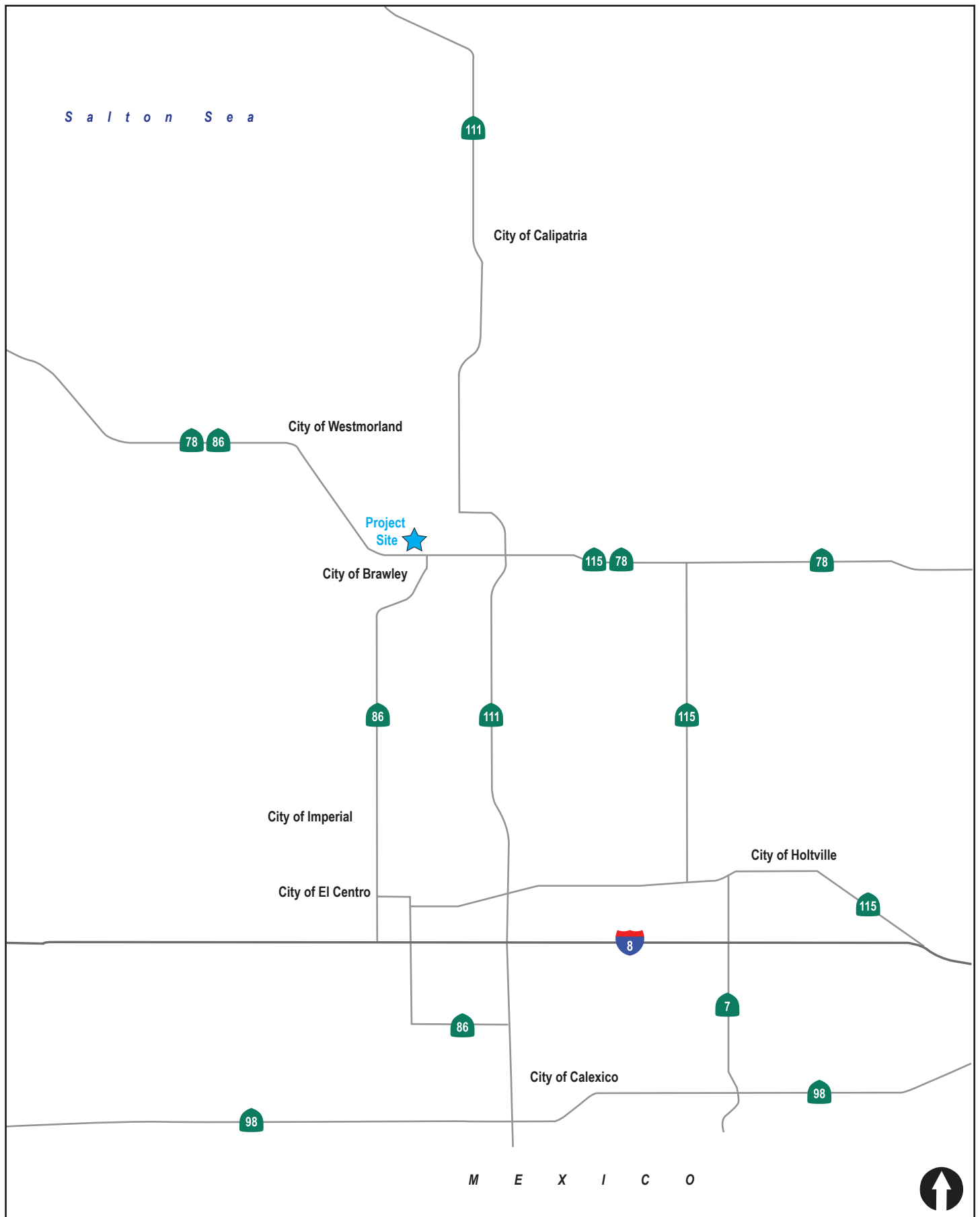
Linscott, Law & Greenspan, Engineers (LLG) has prepared this Vehicle Miles Traveled (VMT) Assessment for the Rio Vista Apartments Project (hereafter referred to as the “Project”). The Project site is located along the north side of W. River Road and west of N. Rio Vista Avenue in the City of Brawley. The Project proposes to construct a 144-unit apartment complex.

Figure 1–1 shows the vicinity map. *Figure 1–2* shows a more detailed Project area map.

This report has been prepared to evaluate the effects of the Project using VMT as the CEQA metric, as proposed by the California Governor’s Office of Planning and Research (OPR) to implement California State Law Senate Bill (SB) 743.

The report is organized as follows:

<i>Section 1.0</i>	Introduction
<i>Section 2.0</i>	Project Description and Trip Generation
<i>Section 3.0</i>	Report Approach, Methodology & Screening Criteria
<i>Section 4.0</i>	Project VMT Screening Assessment
<i>Section 5.0</i>	VMT Impact Summary and Implementation



2.0 PROJECT DESCRIPTION

2.1 Project Location

The Project site is located at 4603 N. Rio Vista Avenue, west of N. Rio Vista Avenue and north of W. River Road in the City of Brawley. The project consists of five parcels (Assessor's Parcel Numbers [APNs] 046-050-016, 046-050-030, 046-050-028, 046-050-028, 046-050-039 and 046-050-038). The 7.21-acre site is currently occupied by an equestrian center that will be demolished as part of the Project.

2.2 Project Description

The Project proposes to construct 144 multifamily residential dwellings, a mix of one-bedroom and two-bedroom units. The apartment complex will include amenities such as a pool, a 4,400 square foot (SF) clubhouse, a dog park, and three green spaces. Vehicular access to the site is proposed via two (2) full access driveways, one on W. River Road and one on N. Rio Vista Avenue. The Project will provide 278 surface parking stalls including 16 spaces compliant with the American with Disabilities Act (ADA).

Figure 2-1 depicts the conceptual site plan.

2.3 Project Trip Generation

The trip rate for Land Use 220 Multifamily Housing (Low-Rise) provided in the Institute of Transportation Engineer (ITE) *Trip Generation Manual*, 12th Edition was used to estimate the trips generated by the Project.

Table 2-1 summarizes the Project trip generation. As shown in *Table 2-1*, the proposed project is calculated to generate 931 ADT with 63 AM peak hour trips (15 inbound / 48 outbound) and 76 PM peak hour trips (47 inbound / 29 outbound).

**TABLE 2-1
PROJECT TRIP GENERATION**

Land Use	Size	Daily Trip Ends (ADTs)		AM Peak Hour					PM Peak Hour				
				Rate	In:Out	Volume			Rate	In:Out	Volume		
		Rate	Volume		Split	In	Out	Total		Split	In	Out	Total
Multifamily Housing (220)	144 DU	a	931	a	24:76	15	48	63	a	62:38	47	29	76

Footnotes:

a. Calculated based on fitted curve equation(s) provided in the *Trip Generation Manual*.

General Notes:

1. Rates are based on Institute of Transportation Engineers (ITE) *Trip Generation Manual* 12th Edition
2. DU = dwelling units



3.0 REPORT APPROACH, METHODOLOGY, & SCREENING CRITERIA

3.1 Background

In September 2013, the Governor's Office signed SB 743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. These changes include the elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The justification for this paradigm shift is that Auto Delay/LOS impacts lead to improvements that increase roadway capacity and therefore induce more traffic and greenhouse gas emissions. The VMT standard for evaluating transportation impacts under CEQA became mandatory statewide on July 1, 2020.

Vehicle Miles Traveled (VMT) is defined as a measurement of miles traveled by vehicles within a specified region and for a specified time period. VMT is a measure of the use and efficiency of the transportation network. VMT's are calculated based on individual vehicle trips generated and their associated trip lengths. VMT accounts for two-way (round trip) travel and is typically estimated on a weekday for the purpose of measuring potential transportation impacts.

3.2 Methodology

The City of Brawley has not yet formally developed guidelines or adopted significance criteria or technical methodologies for VMT analysis. Therefore, LLG utilized the Governor's Office of Planning and Research (OPR) guidelines from the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018, to develop technical VMT methodologies for this Project.

3.3 Screening Criteria

OPR provides the following screening criteria or cases where a development project would be presumed to have a less-than-significant VMT impact based on its location or characteristics without requiring a detailed VMT analysis:

1. Small Projects (less than 110 ADT)
2. Residential and Office Projects in Low VMT Areas (projects in areas with low existing VMT based on a travel survey or travel demand model)
3. Projects Located Near Transit (projects located within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor)
4. Affordable Housing (Residential projects that are 100% affordable located within infill areas)
5. Local-Serving Retail (retail development of 50,000 square feet or less)

4.0 PROJECT VMT SCREENING ASSESSMENT

Based on the screening criteria described in *Section 3.3*, the Project screen out from a VMT analysis as detailed below. *Table 4–1* summarizes the applicability of the screening criteria to the Project.

**TABLE 4–1
PROJECT VMT SCREENING CRITERIA**

Screening Criteria ¹	Applicable to the Project?	Project Screen out?
1. Residential or Office Project Located in a Low VMT Area	Yes	Yes
2. Small Project (less than 300 ADT) (for retail component)	No	—
3. Locally Serving Retail/Recreational Project	No	—
4. Locally Serving Public Facility	No	—
5. Affordable Housing	No	—

Footnotes:

1. OPR *Technical Advisory*, December 2018.

Screening Criteria:

Residential or Office Project Located in a Low VMT Area: Per the OPR *Technical Advisory*, residential projects that locate in areas with low VMT and that incorporate similar features will tend to exhibit similarly low VMT. Because new developments in such a location would likely result in a similar level of VMT, maps can be used to screen residential projects from needing to prepare a detailed VMT analysis.

Further, OPR recommends a threshold of 15% below existing regional VMT per capita for residential projects. Therefore, residential development in an area that generates vehicle travel that is 15% or more below existing residential VMT per capita based on available screening maps is presumed to have a less-than-significant VMT impact.

Result:

The City of Brawley does not have published VMT screening maps. Thus, LLG relied on a travel demand model run prepared in conjunction with the forthcoming County of Imperial transportation guidelines.

Screening maps were created based on a SCAG region model run for the model Base Year 2019. The SCAG model runs on the TransCAD software platform and is an Activity Based Model (ABM)

Based on the available travel demand model, the regional (countywide) average residential VMT/capita is 28.92. The significance threshold of 15% below the regional average would equate to 24.58 VMT/capita.

Within the same model, the Project is in Traffic Analysis Zone (TAZ) 14048200. The residential VMT/capita of TAZ 14048200 is 20.81, or approximately 72% of the regional average. The Project is

therefore expected to generate a level of VMT/capita below the significance threshold of 24.58 and is presumed to generate a less-than-significant VMT impact.

Appendix A provides model data tables including the home-based VMT model results.

5.0 VMT IMPACT SUMMARY AND IMPLEMENTATION

Per the screening criteria applied per OPR guidelines and findings in the previous section, the Project is screened out of requiring a full VMT analysis based on its location in a low VMT area per available travel demand modeling. Therefore, the Project would be presumed to have a less-than-significant VMT impact.