

## MEMORANDUM

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**To:** Paul Lam, Principal Planner, City of Alhambra  
**From:** Dennis Pascua, Transportation Services Manager  
**Subject:** Peer Review of the CEQA VMT Analysis for Villages at The Alhambra  
**Date:** March 10, 2021  
**cc:** Nicole Cobleigh, Dudek  
Sabita Tewani, AICP, Dudek

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The following presents our comments from the peer review of the *Alhambra Residential Project – CEQA VMT* (vehicle miles traveled) *Analysis* dated February 4, 2021 and prepared by the Project Applicant’s consultant, Kimley Horn. Our peer review follows the guidelines in the *City of Alhambra Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (October 2020) and the Governor’s Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018).

In general, we concur with the methodology and findings of the VMT analysis. The VMT analysis has been prepared consistent with the City guidelines and State’s technical advisory. Our comments below focus on the need to provide additional clarification and elaboration of specific items in the analysis.

### Comment 1

**Page 1, Project Description.** The project description has been revised since the June 2019 Traffic Impact Analysis (TIA), also prepared by Kimley Horn. The current project description indicates a total of 839 dwelling units (DUs), which is a decrease in 222 DUs for the 1,061 DUs analyzed in the TIA. Since one of the City’s VMT screening criteria is based on a project’s number of daily trips, an updated daily trip generation estimate should be included.

### Comment 2

**Page 2, VMT Screening.** Please source the “City Guidelines”. It should be: *City of Alhambra Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (October 2020).

### Comment 3

**Page 3, Project Type Screening.** See Comment 1 above. Please indicate project’s daily trip generation estimate to show that it would not meet item #5, “Projects generating less than 110 daily trips”.

### Comment 4

**Page 4, Project VMT Impacts.** The City’s adopted VMT significance criteria is incorrectly stated. The following is the City’s significance criteria:

A project would result in a significant project generated VMT impact if either of the following conditions are satisfied:

1. The baseline project generated VMT per service population exceeds the 15% below the SGVCOG baseline VMT per service population, or
2. The cumulative project generated VMT per service population exceeds 15% below the SGVCOG baseline VMT per service population

The thresholds above should replace those in the VMT analysis, and the thresholds used in the analysis should be moved to the next section, "VMT Analysis" (page 4) where the Production-Attraction (PA) methodology is introduced.

## Comment 5

**Page 4, Home-Based trips.** Please provide information on the specific version of the SCAG model used for the VMT analysis. Also, provide the specific Transportation Analysis Zone (TAZ) number(s) attributed to the project site. Further elaborate on the "adjustments in socio-economic data (households, population and employment)" to understand how the project was accounted for in the modeling.

Also, the second sentence on page 5 should be revised as the project is not a mixed-use development. The project is a residential development adjacent to existing office, retail, and institutional uses. More discussion should be included for the interaction of the project to its adjacent non-residential uses, and how that affects trip-making characteristics.

## Comment 6

**Page 5, Table 4 – Cumulative Project VMT Impact Evaluation.** The cumulative VMT threshold (SGVCOG average) is indicated as 16.27. This is the same value under the existing VMT threshold. Please confirm these are the correct baseline values. Also, please consider including a figure showing the SGVCOG region that was modeled, as well as the location of the project within the SGVCOG region.

This concludes our peer review of the VMT Analysis for Villages at The Alhambra. If you have any questions, please call me at (760) 479-4256 or e-mail me at [dpascua@dudek.com](mailto:dpascua@dudek.com).