
APPENDIX TRAN-1: PROJECT SPECIFIC VEHICLE
MILES TRAVELED ANALYSIS MEMO

MEMORANDUM

DATE: February 23, 2024

TO: Kari Zajac | Ascent Environmental

FROM: Dave Tokarski | DKS Associates

SUBJECT: Sacramento County Residential Rezones – VMT Analysis Project # P23063-000

INTRODUCTION

Ascent Environmental has contracted with DKS Associates to prepare a Vehicle Miles Traveled (VMT) analysis for the proposed rezoning of parcels throughout unincorporated Sacramento County from their current General Plan zoning to residential zoning. The list of parcels includes approximately 80 parcels representing nearly 235 total acres. Each parcel listed includes data including property address (if available), assessor parcel number (APN), CPAC community, current General Plan land use designation and zoning, proposed zoning designation, minimum proposed residential density, maximum proposed residential density, existing use (or vacancy), ownership (public or private), and proposed residential capacity by income level (lower income, moderate income, and above moderate income), and total proposed residential capacity. In addition to a spreadsheet containing the list of proposed parcels, County staff provided the project team with a GIS geodatabase locating each of the sites within the county.

PROPOSED REZONES

Table 1 shows the number of parcels identified for rezones and the number of parcels identified per Community Plan Area, as well as the unincorporated County as a whole. The table shows that a majority of the proposed units are located in the South Sacramento (41%), North Highlands (18%), and Antelope (14%) areas. All other areas combined total approximately 27% of the total potential increase in residential capacity.

Figure 1 shows the location (and site number) of each of the rezone parcels along with the extents of unincorporated communities.

TABLE 1: REZONE PARCELS BY COMMUNITY PLAN AREA

UNINCORPORATED COMMUNITY	NUMBER OF PARCELS	TOTAL ACRES	TOTAL CAPACITY (DU)	PERCENT OF TOTAL CAPACITY
ANTELOPE	4	29.63	1,037	14%
ARDEN ARCADE	1	1.98	59	1%
CARMICHAEL/OLD FOOTHILL FARMS	10	16.62	387	5%
FAIR OAKS	2	2.89	85	1%
NATOMAS	0	0.00	-	0%
NORTH HIGHLANDS	10	42.52	1,359	18%
ORANGEVALE	7	7.93	218	3%
CORDOVA	2	13.90	556	7%
RIO LINDA/ELVERTA	6	18.77	561	8%
SOUTH SACRAMENTO	35	96.47	3,014	41%
VINEYARD	2	4.81	143	2%
TOTAL REZONE SITES	79	235.52	7,419	100%

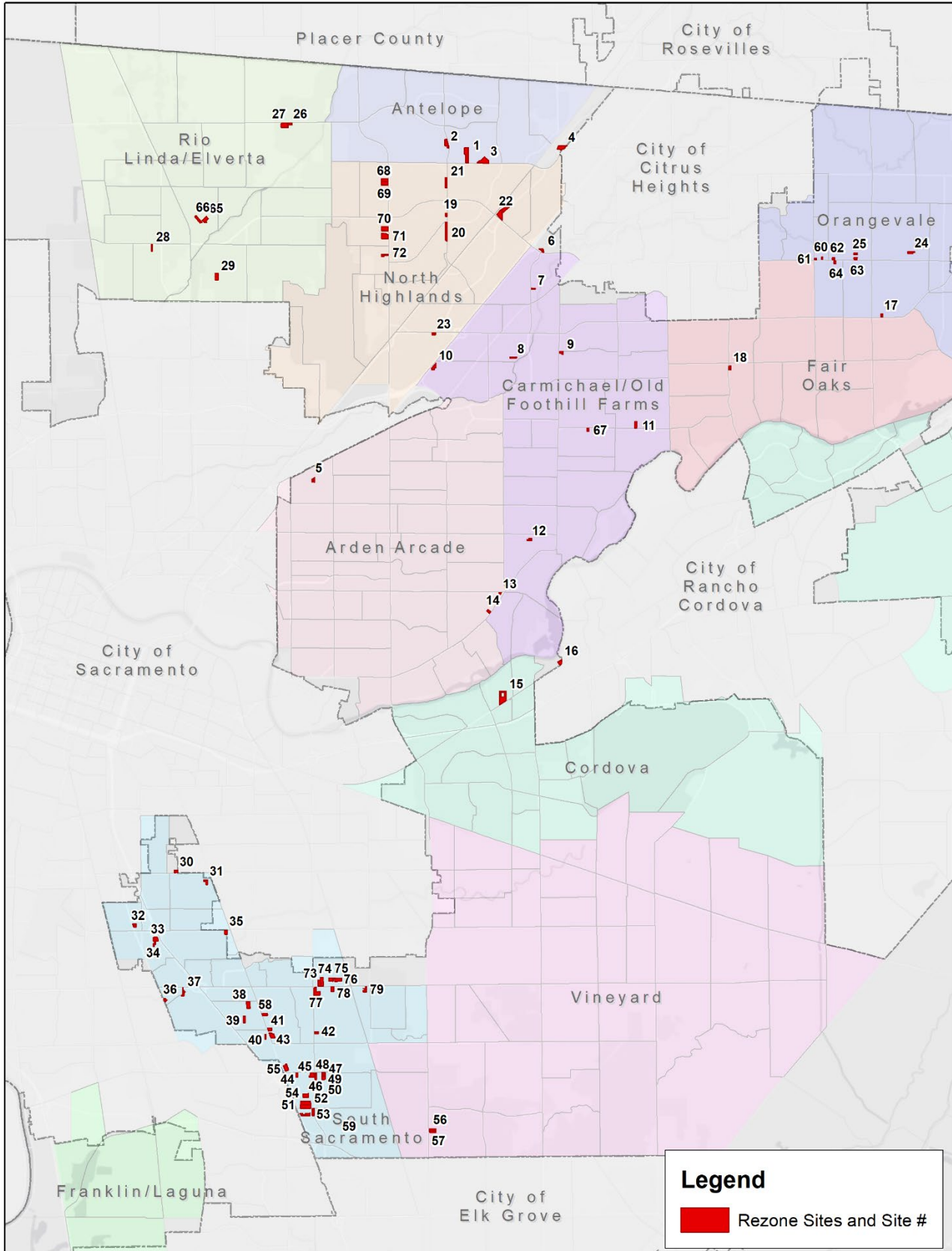


FIGURE 1: LOCATION OF REZONE PARCELS

VMT MODELING

In order to analyze the impacts of the rezones on VMT, the potential rezone parcels needed to be modified in the regional travel demand model used for VMT analysis by Sacramento County. SACOG (the Sacramento Area Council of Governments) maintains a regional activity-based model (ABM) called SACSIM19, which is used by local jurisdictions, including Sacramento County, for regional transportation impact analysis. SACOG currently maintains a base year (2016) scenario, as well as a number of future year (2027, 2035, and 2040) scenarios. Additionally, Sacramento County has had its consultants develop a "Super-Cumulative" scenario for use in major impact studies in the unincorporated County, including major development projects along Jackson Highway in the southeast portion of the County and in the Natomas area. Based on discussions with County staff, this analysis relies on this "Super-Cumulative" model for cumulative conditions.

The model uses "pseudo" parcels as its main land use input. Each "pseudo" parcel consists of a set of XY coordinates to represent the approximate center of the actual land use area, as well as other data including traffic analysis zone (TAZ), number of households, number of enrolled students at schools (primary, high school, and university), number of employees (education, food/beverage, government, industrial, medical, office, retail, service, other, and total), and other fields not directly involved in land use modifications. In addition to the parcels file, the land use inputs include a "households" file (with details for each household linked to a parent parcel) and a "persons" file (with details for each person linked to a parent household). These files are all interdependent, so changing land use includes making changes to all three of them.

In order to apply the proposed rezones at a parcel level, it was necessary to associate each parcel (polygon) identified for rezoning to an appropriate pseudo parcel (XY point) in the model. This was achieved using GIS (geographic information systems) spatial joining processes. Once the appropriate SACSIM19 parcel was identified in both the base year (2016) and super-cumulative models, then land use assumed in the model was identified in order to determine how best to apply the rezone dwelling units. In some cases, there was no model pseudo-parcel match for the identified polygon parcel. These locations had to be added to the model input.

Based on review of all rezone parcels and both the 2016 (for existing plus project) and super-cumulative (cumulative plus project) models, a number of cases were identified that each would require assumptions to be made regarding the relationship between the assumed dwelling unit capacity assumed with the rezones and the data already contained in the models. These cases and assumptions made for allocating the rezone dwelling units in the model are listed below.

- Existing Plus Project
 - For sites where there are 1 or 2 dwelling units in the model, assume those dwelling units will be replaced by the County's assumed rezone units
 - For sites where there are higher dwelling units in base year SACSIM model than County's rezone units, keep the units already in the model
 - For sites where base year model has fewer dwelling units than County Rezone units, replace with County Rezone units
 - For sites where there is a small amount of employment, zero out the employment
 - For sites where there is a large amount of employment, review case by case

- Cumulative Plus Project
 - For sites where there are 1 or 2 dwelling units in the model, assume those dwelling units will be replaced by the County's assumed rezone units
 - For sites where there are higher dwelling units in cumulative SACSIM model than County's rezone units, keep the units already in the model
 - For sites where there is a small amount of employment, zero out the employment
 - For sites where there is a large amount of employment, review case by case

Based on these assumptions, less than the total 7,419 total dwelling units were added to each model, as some of the rezone units were already included in each of the model land use inputs. Once the land use changes were applied to subject parcels, households, and persons in the model, the model was rerun for both Existing Plus Rezones and Super-Cumulative Plus Rezones scenarios. As with previous VMT studies prepared for Sacramento County, VMT per Capita and VMT per Employee were calculated for each TAZ and the region as a whole, as was VMT by speed bin data for the region as a whole.

VMT RESULTS

Table 2 shows the changes in regionwide VMT associated with the proposed rezones. The table summarizes both total region wide network VMT and VMT per Capita for both Existing (2016) and Super Cumulative conditions without and with the rezones, as well as the difference between the two. The table shows that region wide network VMT increases by approximately 1.2% under Existing Plus Project conditions and by approximately 0.2% under Super-Cumulative Plus Project conditions. It should be noted that network VMT reported in this table are rounded to the nearest 100. A more detailed version of this data (unrounded and divided into 5 mile per hour "speed bins") is shown in **Table 3**.

Sacramento County, in accordance with OPR (Office of Planning and Research) guidance¹ has identified an 85% threshold for residential VMT for projects within Unincorporated Sacramento County. In other words, any project whose VMT per Capita (calculated using an accepted methodology, such as using the travel demand model as done in this analysis) exceeds 85% of the regional average represents a significant impact in regard to VMT.

¹ *Technical Advisory on Evaluating Transportation Impacts in CEQA*, California OPR, December 2018

TABLE 2: CHANGE IN REGION WIDE VMT METRICS

	BASE YEAR			SUPER-CUMULATIVE		
	NO PROJECT	WITH REZONEES	CHANGE	NO PROJECT	WITH REZONEES	CHANGE
REGION WIDE NETWORK VMT	58,394,800	59,033,100	+638,300	76,811,500	77,021,600	+210,100
% CHANGE			+1.1%			+0.3%
REGION WIDE VMT PER CAPITA	20.20	20.26	+0.06	18.39	18.39	No change
85% THRESHOLD	17.17			15.63		

Note: Network VMT rounded to the nearest 100

TABLE 3: CHANGE IN REGION WIDE VMT BY SPEED BIN

SPEED BIN	BASE YEAR			SUPER-CUMULATIVE		
	NO PROJECT	WITH REZONES	CHANGE	NO PROJECT	WITH REZONES	CHANGE
0 TO 5MPH	50,799	27,469	-23,329	125,841	129,050	+3,209
5 TO 10MPH	200,934	167,696	-33,238	495,852	514,762	+18,909
10-15MPH	456,721	423,387	-33,334	821,862	861,363	+39,501
15-20MPH	5,728,177	5,771,262	+43,085	7,658,454	7,682,544	+24,089
20-25MPH	2,460,631	2,593,557	+132,927	3,471,090	3,476,845	+5,755
25-30MPH	3,491,580	3,528,941	+37,361	5,433,368	5,531,272	+97,904
30-35MPH	7,185,027	7,277,347	+92,321	10,666,252	10,664,753	-1,500
35-40MPH	6,866,787	6,707,873	-158,914	9,791,219	9,801,348	+10,129
40-45MPH	5,504,646	5,218,567	-286,079	6,460,529	6,478,169	+17,641
45-50MPH	3,879,665	3,013,793	-865,873	5,423,781	5,451,761	+27,980
50-55MPH	7,268,118	6,077,210	-1,190,908	10,335,231	10,306,342	-28,890
55-60MPH	11,253,035	12,038,521	+785,486	12,276,140	12,249,091	-27,048
60-65MPH	2,788,265	4,676,265	+1,888,001	2,308,016	2,330,235	+22,219
65+MPH	1,260,403	1,511,260	+250,857	1,543,895	1,544,080	+184
TOTAL	58,394,787	59,033,149	+638,362	76,811,532	7,021,615	+210,083

Table 4 shows the changes in VMT per Capita summarized by unincorporated community with implementation of the rezones. The table shows that under base year no project conditions, five of the ten communities have VMT per Capita 85% or less of the regional average. Of these five, four communities see a decrease in VMT per Capita with the addition of the rezones, while one (Vineyard) sees an increase the VMT per Capita that is already beyond the threshold for a VMT impact. None of the decreases result in VMT per Capita decreasing to below the 85% threshold. Under future (“Super-Cumulative”) conditions, one of the ten communities (Rio Linda/ Elverta) is projected to have VMT per Capita beyond the 85% threshold without the rezones. This community sees an increase in VMT per Capita with the addition of the rezones. One additional community (Orangevale) is projected to have VMT per Capita at exactly the 85% threshold, while the addition of the rezones increases VMT per Capita in this community beyond the threshold.

TABLE 4:VMT PER CAPITA (ALL UNINCORPORATED TAZS) BY COMMUNITY PLAN AREA1

Sacramento County CPAC	# of TAZs Uninc CPAC Changed TAZs		VMT/Capita (Sacramento County CPACs)			
			2016		Super-Cumulative	
			Base	Rezone Change	No Build	Rezone Change
Antelope	9	3	18.30	18.14 -0.16	16.97	17.13 +0.16
Arden Arcade	42	1	14.45	14.51 +0.06	13.27	13.33 +0.06
Carmichael/Old Foothill Farms	36	9	15.84	15.85 +0.01	14.74	14.80 +0.06
Fair Oaks	17	1	17.76	17.71 -0.05	16.35	16.41 +0.06
North Highlands	20	8	15.68	15.51 -0.17	14.68	14.68 +0
Orangevale	16	5	17.82	17.80 -0.02	17.17	17.22 +0.05
Rancho Cordova	32	2	17.03	17.16 +0.13	15.25	15.21 -0.04
Rio Linda/Elverta	22	4	21.32	21.08 -0.24	19.58	19.75 +0.17
South Sacramento	25	15	15.27	14.92 -0.35	14.22	14.13 -0.09
Vineyard	41	1	19.68	20.48 +0.80	15.17	14.77 -0.40
Regionwide VMT per Capita			20.20			
85% of Regional			17.17			

Note: **Bold** numbers represent VMT per Capita greater than 17.17 (85% of base year regionwide average)

TAZ = Traffic Analysis Zone

¹ The results presented in this table are inclusive of three candidate rezone sites (in the South Sacramento community) that are no longer part of the project.

Table 5 shows the changes in VMT per Capita summarized by each of the four EIR's that have been certified by Sacramento County in previous years, including the North Watt Corridor Plan, The Old Florin Town SPA, the Fair Oaks Boulevard Corridor Plan, and the remaining area of the Sacramento County General Plan. The table shows that the rezone sites in each of the areas above covered by a previous EIR have VMT per Capita less than the 85% threshold and although the North Watt Corridor sites show a slight increase in VMT per Capita under Super-Cumulative conditions, none of the sites show VMT per Capita increases that would put them above the threshold.

TABLE 5: VMT PER CAPITA FOR REZONE SITES WITHIN PREVIOUS EIRS

Sacramento County CPAC	Number Of Sites	Number Of DU	VMT/Capita (Sacramento County CPACs)			
			2016		Super-Cumulative	
			Base	Rezone Change	No Build	Rezone Change
North Watt Corridor Plan EIR	5	735	15.39	13.42 -1.97	14.61	14.64 +0.04
Old Florin Town SPA EIR	7	777	13.90	11.73 -2.17	12.65	12.29 -0.36
Fair Oaks Blvd EIR	1	37	14.64	14.25 -0.39	13.46	13.40 -0.06
Remainder GP EIR	66	5,870	16.59	15.86 -0.73	15.61	15.08 -0.52
All Rezone Sites	79	7,419	16.18	15.17 -1.01	15.19	14.74 -0.45
Regionwide VMT per Capita			20.20			
85% of Regional			17.17			

Note: **Bold** numbers represent VMT per Capita greater than 17.17 (85% of base year regionwide average)
TAZ = Traffic Analysis Zone

Table 6 summarizes the number of rezone dwelling units that meet the 85% threshold (non-impact) or exceed the 85% threshold (impact). The table show that of the 7,419 total proposed units, 1,282 (or 17.3%) of the units exceed the threshold under base year conditions, while 1,119 (or 15.1%) of the units exceed the threshold under Super-Cumulative conditions.

TABLE 6: DWELLING UNITS IMPACTS BY COMMUNITY PLAN AREA

Sacramento County CPAC	Number Of Sites	Number of DU	Dwelling Unit Impacts by CPAC				
			2016 Rezone		Super-Cumulative Rezone		
			Non-Impact	Impact	Non-Impact	Impact	
Antelope	4	1,037	687	350	826	211	
Arden Arcade	1	59	59	-	59	-	
Carmichael/Old Foothill Farms	10	387	305	82	387	-	
Cordova	2	556	556	-	556	-	
Fair Oaks	2	85	-	85	48	37	
North Highlands	10	1,359	1,359	-	1,359	-	
Orangevale	7	218	51	167	51	167	
Rio Linda/Elverta	6	561	106	455	-	561	
South Sacramento	35	3,014	3,014	-	3,014	-	
Vineyard	2	143	-	143	-	143	
Total	79	7,419	6,137	1,282	6,300	1,119	
Percent of Units >85% of Regional Average				17.3%		15.1%	

Note: DU = Dwelling Unit

Impact = VMT per Capita greater than 17.17 (85% of base year regionwide average)

Table 7 shows the VMT per Capita (and resultant percentage of regional average) for each of the 79 sites identified for rezone dwelling units. This table allows the County to review each site individually to determine if that site meets or exceeds the 85% threshold. Any locations that are shown in **bold** and **shaded** exceed the 85% threshold and represent a significant impact in terms of VMT. Those that are not bold or shaded meet the threshold and therefore do not represent a significant impact in terms of VMT.

In addition to the results for each site, the table also shows that the weighted average VMT per Capita for all rezone households (based on number of units per site) falls within the 85% threshold for both base year (75%) and future year (73%) conditions.

TABLE 7:VMT PER CAPITA (REZONE PARCELS ONLY) BY SITE

Rezone Location	Sacramento County CPAC	Site #	TAZ	DU	VMT/Capita (Rezone Locations)				
					2016		Super-Cumulative		
					VMT per Capita	% of Region Wide	VMT per Capita	% of Region Wide	
0.3 miles W of Antelope Road/Walerga Road	Antelope	1	324	300	16.32	81%	15.34	76%	
0.2 miles S of Elverta Road/Walerga Road		2	1107	139	17.75	88%	16.18	80%	
S Antelope Road/Elverta Road		3	324	387	16.32	81%	15.34	76%	
370 feet N Roseville Road/Antelope Road		4	427	211	18.63	92%	17.22	85%	
2328 Edison Avenue, 2332 Edison Avenue & 2336 Edison Avenue	Arden Arcade	5	378	59	12.56	62%	11.86	59%	
6344 Verner Avenue	Carmichael/ Old Foothill Farms	6	433	54	17.88	89%	16.69	83%	
5804 Garfield Avenue		7	434	26	15.60	77%	14.58	72%	
4921 Hemlock Street		8	886	39	14.19	70%	13.16	65%	
5817 Muldrow Road		9	405	13	15.84	78%	14.46	72%	
5108 Pasadena Avenue		10	384	45	14.44	71%	13.56	67%	
8545 Fair Oaks Boulevard		11	403	90	16.50	82%	15.47	77%	
2421 Garfield Avenue & 2413 Garfield Avenue		12	392	55	16.42	81%	15.41	76%	
5020 Arden Way		13	365	7	18.03	89%	16.61	82%	
4845 Fair Oaks Boulevard		14	365	21	18.03	89%	16.61	82%	
9425 Folsom Boulevard		Cordova	15	590	458	14.78	73%	13.89	69%
450 feet NE Folsom Boulevard/Paseo Rio Way			16	570	98	14.47	72%	13.42	66%
8933 Madison Avenue & 8937 Madison Avenue		Fair Oaks	17	465	37	17.88	89%	17.26	85%
4746 Sunrise Boulevard & 4742 Sunrise Boulevard		Fair Oaks	18	415	48	17.37	86%	15.15	75%
NW Walerga Road/Blackjack Way		North Highlands	19	315	19	14.80	73%	14.20	70%
SW Walerga Road/Don Julio Boulevard	20		317	171	14.58	72%	13.75	68%	
NW Walerga Road/Galbraith Drive	21		321	100	15.49	77%	14.87	74%	
E Roseville Road/Elkhorn Boulevard overpass	22		328	298	13.75	68%	13.21	65%	
5140 Harrison Street	23		331	36	14.64	72%	13.63	67%	
6321 Chestnut Avenue	Orangevale		24	455	65	18.95	94%	17.19	85%
6245 Beech Avenue		25	459	42	17.64	87%	17.50	87%	

TABLE 7: (CONTINUED): VMT PER CAPITA (REZONE PARCELS ONLY) BY SITE

Rezone Location	Sacramento County CPAC	Site #	TAZ	Rezone Dwelling Units	VMT/Capita (Rezone Locations)			
					2016		Super-Cumulative	
					VMT per Capita	% of Region Wide	VMT per Capita	% of Region Wide
120 feet W of Elverta Road/Bellingrath Drive	Rio Linda/Elverta	26	1411	34	18.65	92%	17.64	87%
480 feet W of Elverta Road/Bellingrath Drive		27	1411	175	18.65	92%	17.64	87%
232 Elkhorn Boulevard		28	303	45	19.87	98%	18.73	93%
5919 Dry Creek Road		29	300	106	17.04	84%	17.22	85%
4541 Fruitridge Road		30	493	53	15.47	77%	14.46	72%
5903 Southwest Avenue		31	495	85	13.42	66%	12.62	62%
SE 45th Avenue/Franklin Boulevard & 6301 Franklin Boulevard		32	698	51	12.70	63%	11.27	56%
4001 48th Avenue		33	696	105	13.16	65%	12.84	64%
NE 49th Avenue/Wesley Avenue		34	696	41	13.16	65%	12.84	64%
240 feet W of 47th Avenue/Stockton Boulevard		35	497	64	13.37	66%	13.31	66%
180 feet SE of Franklin Boulevard/Meadowgate Drive	South Sacramento	36	700	42	10.74	53%	10.80	53%
7236 E Parkway		37	701	62	15.81	78%	15.44	76%
630 feet W of 66th Avenue/Stockton Boulevard		38	1160	175	14.05	70%	14.02	69%
6130 Orange Avenue		39	1160	70	14.05	70%	14.02	69%
6707 Stacy Avenue		40	503	33	16.33	81%	15.18	75%
NE Stockton Boulevard/Walter Avenue		41	898	67	13.14	65%	12.41	61%
7525 Power Inn Road & 7521 Power Inn Road		42	510	42	13.16	65%	12.51	62%
NE Stockton Boulevard/Whitewillow Drive		43	898	128	13.14	65%	12.41	61%
7604 Elsie Avenue		44	914	18	15.91	79%	16.06	80%
7825 Robinette Road		45	914	123	15.91	79%	16.06	80%
SE Elsie Avenue/Power Inn Road		46	914	26	15.91	79%	16.06	80%
SW Elsie Avenue/Iona Way		47	914	10	15.91	79%	16.06	80%

TABLE 7: (CONTINUED): VMT PER CAPITA (REZONE PARCELS ONLY) BY SITE

Rezone Location	Sacramento County CPAC	Site #	TAZ	Rezone Dwelling Units	VMT/Capita (Rezone Locations)				
					2016		Super-Cumulative		
					VMT per Capita	% of Region Wide	VMT per Capita	% of Region Wide	
140 feet W of Elsie Avenue/Iona Way	South Sacramento	48	914	12	15.91	79%	16.06	80%	
220 feet S of Elsie Avenue/Iona Way		49	914	14	15.91	79%	16.06	80%	
350 feet S of Elsie Avenue/Iona Way		50	914	28	15.91	79%	16.06	80%	
7901 Stevenson Avenue		51	914	195	15.91	79%	16.06	80%	
7516 Rangeview Lane		52	914	279	15.91	79%	16.06	80%	
8016 Stevenson Avenue & 540 feet S of Stevenson Avenue/Power Inn Rd		53	1125	79	15.46	77%	14.25	71%	
540 feet W of Lenhart Road/Power Inn Road		54	914	61	15.91	79%	16.06	80%	
7333 Elsie Avenue		55	503	145	16.33	81%	15.18	75%	
8207 Elk Grove Florin Road		Vineyard	56	1127	72	20.30	100%	17.46	86%
8225 Elk Grove Florin Road			57	1127	71	20.30	100%	17.46	86%
NE Stockton Boulevard/Orange Avenue	South Sacramento	58	898	90	13.14	65%	12.41	61%	
8095 E Stockton Boulevard & 8099 E Stockton Boulevard		59	1125	139	15.46	77%	14.25	71%	
8553 Greenback Lane	Orangevale	60	453	10	15.10	75%	15.50	77%	
NE Greenback Lane/Kenneth Avenue		61	453	6	15.10	75%	15.50	77%	
300 feet E of Greenback Lane/Almond Avenue		62	459	8	17.64	87%	17.50	87%	
NW Beech Avenue/Greenback Lane		63	459	52	17.64	87%	17.50	87%	
8646 Greenback Lane		64	461	35	17.15	85%	16.44	81%	
970 Oak Lane	Rio Linda/Elverta	65	302	111	20.04	99%	18.92	94%	
864 Oak Lane		66	302	90	20.04	99%	18.92	94%	
7904 Fair Oaks Boulevard	Carmichael/Old Foothill Farms ¹	67	397	37	14.25	71%	13.40	66%	
500 feet N of Watt Avenue/Q Street	North Highlands ²	68	320	122	13.65	68%	15.14	75%	
7235 Watt Avenue		69	320	184	13.65	68%	15.14	75%	
0.2 miles S Watt Avenue/Elkhorn Blvd		70	316	154	13.11	65%	14.45	72%	
0.1 miles N Watt Avenue/I Street		71	316	190	13.11	65%	14.45	72%	
6233 Watt Avenue		72	318	85	13.86	69%	13.65	68%	

Note ¹: Within Fair Oaks Blvd Corridor Plan EIR Area

Note ²: Within North Watt Avenue Corridor Plan EIR Area

TABLE 7: (CONTINUED): VMT PER CAPITA (REZONE PARCELS ONLY) BY SITE

Rezone Location	Sacramento County CPAC	Site #	TAZ	Rezone Dwelling Units	VMT/Capita (Rezone Locations)				
					2016		Super-Cumulative		
					VMT per Capita	% of Region Wide	VMT per Capita	% of Region Wide	
8149 Florin Road	South Sacramento ³	73	512	84	10.43	52%	12.09	60%	
8165 Florin Road		74	512	141	10.43	52%	12.09	60%	
90 feet N of Augusta Way/Bacchini Avenue		75	512	72	10.43	52%	12.09	60%	
430 feet N of McCurdy Lane/Florin Road		76	512	141	10.43	52%	12.09	60%	
SE Power Inn Road/Florin Road		77	510	174	13.16	65%	12.51	62%	
180 feet E of Florin Road/Kara Drive		78	510	90	13.16	65%	12.51	62%	
8475 Florin Road & 180 feet S of Florin Road/Simon Street		79	1185	75	14.28	71%	12.69	63%	
Weighted Average VMT per Capita				7,419	15.17	75%	14.74	73%	

Note ³: Within Old Florin Town SPA EIR Area

Note: DU = Dwelling Unit

Bold and **shaded** represent VMT Impact = VMT per Capita greater than 17.17 (85% of base year regionwide average)

TAZ = Traffic Analysis Zone

