

To: Matt Washburn
Folsom Cordova Unified School District

From: Tyler Mickelson, PE
Atticus Washington, EIT
Matt Weir, PE, TE, PTOE, RSP₁

Re: *Vehicle Miles Traveled (VMT) Screening Analysis*
FCUSD High School/Middle School
Folsom Ranch – Folsom, California

Date: October 13, 2025

Consistent with the CEQA VMT Analysis task described in Amendment 1 of our Scope of Services, and as required by the City of Folsom (“City”), Kimley-Horn is writing to summarize the Vehicle Miles Traveled (VMT) screening analysis completed for the FCUSD High School/Middle School project in Folsom Ranch (the “Proposed Project” or “Project”). The purpose of this memorandum is to summarize the VMT analysis and resultant findings for the proposed Project.

Project Description

The Project proposes to swap the existing Folsom Ranch middle school parcel north of Mangini Parkway near Sierra Boulevard with a parcel adjacent to the proposed high school to be located southwest of the Mangini Parkway intersection with Oak Avenue, including the rezoning of the adjacent parcel. The proposed Project site plan is shown in **Figure 1**. The Project location and general vicinity is depicted in **Figure 2**.

Purpose of Analysis

Senate Bill 743 (2013) changed the focus of transportation impact analyses in CEQA from measuring impacts to drivers, to measuring the impact of driving. The change was made by replacing Level of Service (LOS) with VMT. This shift in transportation impact focus was intended to better align transportation impact analyses and mitigation outcomes with the State’s goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation. Level of service or other delay metrics may still be used to evaluate the impact of projects on drivers as part of land use entitlement review, fee programs, and community plan conformance.

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 aid lead agencies with SB 743 implementation, the Governor’s Office of Planning and Research (OPR) produced the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) that provides guidance 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 (VMT per capita for residential and VMT per employee for office).
- OPR notes that residential and office projects that are located in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT.
- OPR recommends that new retail development be evaluated using a net change metric. In addition, by adding retail opportunities into the urban fabric and improving retail destination proximity, local serving retail tends to shorten trips and reduce VMT. Generally, retail development of less than 50,000 square feet may be considered local serving.
- Lead agencies have the discretion to set or apply their own significance thresholds.

As the City of Folsom has not yet adopted VMT guidelines, this screening analysis was conducted consistently with Sacramento County’s VMT guidelines which are consistent with OPR guidance. The screening thresholds to consider for projects located within Sacramento County defined by Sacramento County *Traffic Impact Analysis Guidelines*¹ are the following:

- Small Projects – Projects generating less than or equal to 230 average daily traffic.
- Local-Serving Retail – Projects consisting of local serving retail uses must meet the following screening criteria:
 - Total gross floor area must be less than 125,000 square feet for infill developments or supported by a market capture area of 3 miles or less; and
 - Project land is not a regional-serving land use.
- **Local-Serving Public Facilities/Services – Local-serving public facilities/services include day care centers, public K-12 schools, neighborhood park, community centers, post offices, police and fire facilities, libraires, government offices, utility, communications, water sanitation, waste management, and similar facilities.**
- Projects in VMT-Efficient Areas – Projects located low VMT-generating areas area based on approved screening maps. Projects must be consistent in size and land use with the surrounding built environment.
- Project Near Transit Station – Projects must satisfy all the following requirements:
 - Located with ½ mile of an existing high-quality transit stop²; and
 - Minimum floor area ratio of 0.75; and
 - Does not include substantially more parking than required; and
 - Does not replace affordable housing; and
 - Does not negatively impact active transportation facilities (transit, bike, or pedestrian infrastructure).
- Affordable Housing – Projects consisting of deed-restricted affordable housing must meet the following criteria
 - Does not include substantially more parking than required; and
 - Transit access is within ½ mile walking distance from project
 - Does not negatively impact active transportation facilities (transit, bike, or pedestrian infrastructure).

¹ *Sacramento County Traffic Impact Analysis Guidelines*, County of Sacramento, January 2025.

² High-quality transit stops include existing rail transit stations, a ferry terminal, or the intersection of two or more major bus routes with frequency of 20 minutes or less during AM and PM commute periods.

Methodology and Assumptions

Based on the land use information provided, for the purposes of VMT screening analysis and the determination of transportation related significant impacts, the following screening criterion was analyzed:

- Local-Serving Public Facilities/Services – Public K-12 Schools

A project is considered to result in a less than significant impact if it meets the definition and screening criteria for local-serving public facilities or services development as identified in the Sacramento County Guidelines.

Screening Analysis

As defined in the Sacramento County *Guidelines*, the Project, regardless of location, meets the definition of a local serving public facility. The proposed Project will relocate the planned location of Folsom Ranch middle school parcel to a new parcel located adjacent to the specific plan's proposed high school site. Relocating the planned parcel for the proposed Project within the specific plan area will not change the Folsom Ranch middle school exemption status under the County's guidelines. This finding is because Public K-12 schools primarily function to serve the surrounding residents rather than attract vehicle travel across the region/County primarily because they are located within the communities they serve.

The proposed Project meets the County's local serving public facility screening criteria and thus is presumed to result in **a less than significant VMT impact**.

Conclusions

Based on review of Sacramento County's VMT screening criteria the following conclusions are made:

- The proposed Project meets Sacramento County's VMT screening criteria of a local-serving public facility and is presumed to result in **a less than significant VMT impact**.

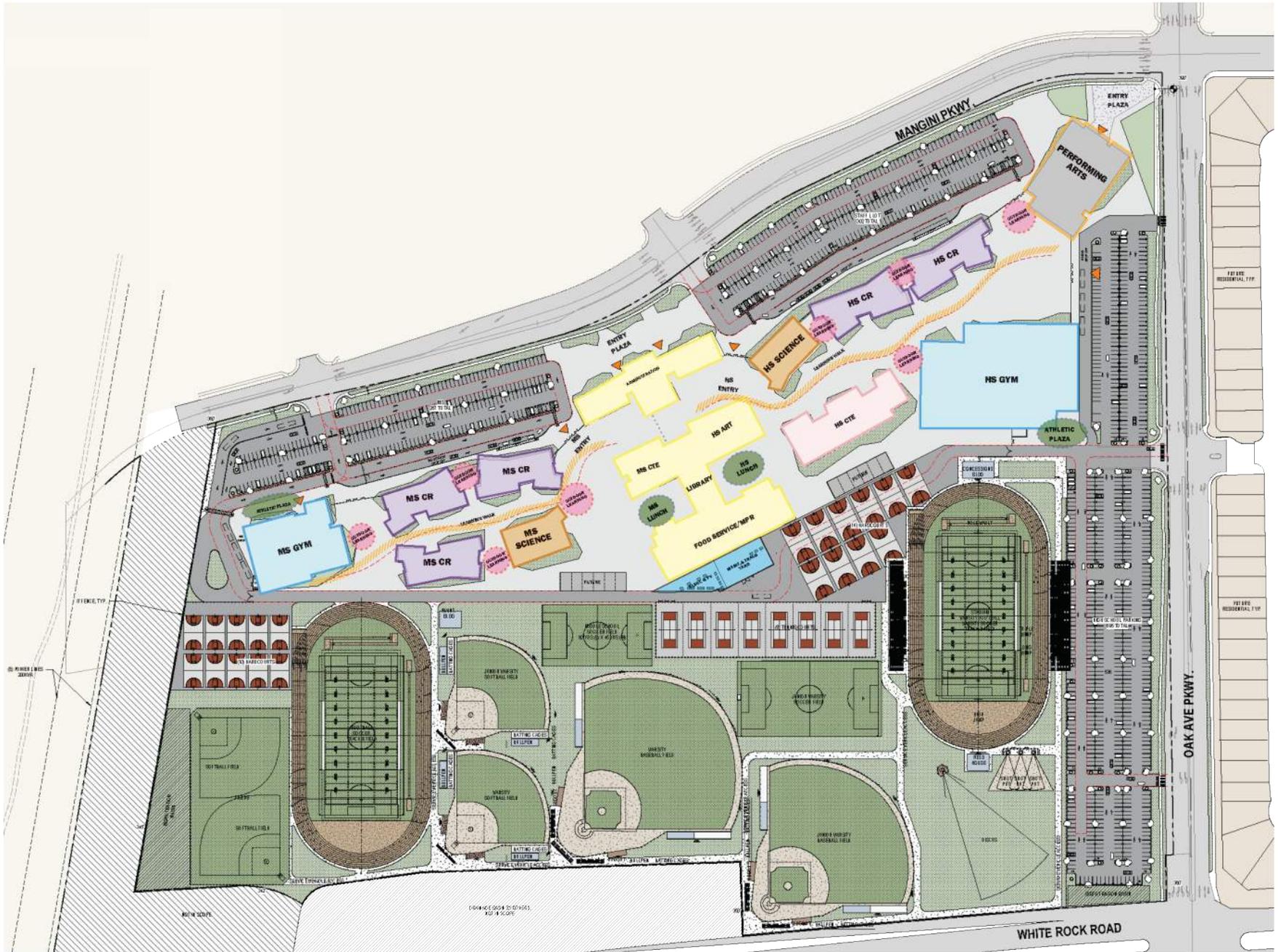
Attachments

Figure 1 – Project Site Plan

Figure 2 – Project Vicinity Map



NOT TO SCALE



Source: DLR Group, April 8, 2025

