URBAN CROSSROADS

August 25, 2020

Mr. Patrick Russell
SARES-REGIS Group
18802 Bardeen Avenue
Irvine, CA 92612

SUBJECT: OLEANDER BUSINESS PARK VEHICLE MILES TRAVELLED (VMT) ANALYSIS

Dear Mr. Patrick Russell:

The following Vehicle Miles Travelled (VMT) Analysis has been prepared for the proposed Oleander Business Park (**Project**), which is located south of Nandina Avenue, north of Oleander Avenue and west of Decker Road in the County of Riverside.

PROJECT OVERVIEW

The Project proposes construction and operation of approximately 710,736 square feet of light industrial/manufacturing uses 1 within an approximately 93.85-acre site (gross), located within the Mead Valley area of Riverside County. As part of the Project, Parcel Map 5128 (Parcel Map Book [P.M.B.] 8/54) comprising 4 parcels, would be reconfigured via Riverside County Lot Line Adjustment procedures. Project Parcel 1 (approximately 20.90 acres) would be developed with approximately 363,367 square feet of light industrial uses. Project Parcel 2 (approximately 19.59 acres) would be developed with approximately 347,369 square feet of light industrial uses. Project Parcels 3 and 4, totaling approximately 53.36 acres (gross) would remain vacant. Trips generated by the Project's proposed land uses have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017. (1) The proposed Project is anticipated to generate a total of 1,366 vehicle trip-ends per day (expressed in actual vehicles). (2)

BACKGROUND

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which requires all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December of 2018) (**Technical Advisory**). (3) Based on OPR's Technical Advisory, the County of Riverside is currently in development of an updated version to their Transportation Analysis Preparation Guide (**County Guidelines**). The new County Guidelines have yet to be formally released, however, to prepare this VMT analysis, Urban Crossroads consulted with County Transportation staff to obtain an

understanding of the upcoming VMT impact thresholds and analysis methodology requirements. This analysis has been prepared based on those discussions.

PROJECT SCREENING

Consistent with County Guidelines, projects that meet certain screening thresholds based on their location and project type may be presumed to result in a less than significant transportation impact. Consistent with the screening criteria recommended in OPR's Technical Advisory, the County of Riverside will utilize the following project screening thresholds that may be applicable to the Project:

- Transit Priority Area (TPA) Screening
- Map-Based Screening
- Project Type Screening

A land use project need only meet one of the above screening criteria to result in a less than significant impact.

TPA SCREENING

Consistent with guidance identified in the Technical Advisory, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing "major transit stop"[1] or an existing stop along a "high-quality transit corridor"[2]) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes 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);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The Project is not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor.

The TPA screening threshold is not met.

[1] Pub. Resources Code, § 21064.3 ("'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").
[2] Pub. Resources Code, § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.").

MAP-BASED SCREENING

The Technical Advisory notes that "residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary."[3] County Guidelines also note that the use of map-based screening for low VMT generating areas is also applicable for other employment uses such as the Project's industrial development. Urban Crossroads has obtained a map from County staff that identifies VMT for the traffic analysis zone (TAZ) that contains the Project. The map utilizes the sub-regional Riverside Transportation Analysis Model (RIVTAM) to measure current VMT performance within individual TAZ's and compares them to the applicable impact threshold (e.g., VMT per employee for office or industrial land uses and VMT per capita for residential land uses). As shown in Attachment A, the Project is not located within a TAZ that currently generates lower VMT than the County's threshold of 14.24 VMT per employee.

The Low VMT Area screening threshold is not met.

PROJECT TYPE SCREENING

The County Guidelines identify that local serving retail with buildings less than 50,000 square feet or other local serving essential services (e.g., day care centers, public schools, medical/dental office buildings, etc.) are presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, small projects anticipated to generate low traffic volumes and by association low greenhouse gas (GHG) emissions are also assumed to cause a less than significant impact. The County's small project threshold of 208,000 square feet of industrial warehouse land use would be exceeded by the proposed Project's total building square footage.

The Project Type screening threshold is not met.

PROJECT GENERATED VMT

Project's that do not meet VMT screening criteria should prepare a project level VMT analysis. RIVTAM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. RIVTAM is a travel forecasting model that represents a sub-area (Riverside County) of the Southern California Association of Governments (SCAG) regional traffic model. RIVTAM was designed to provide a greater level of detail and sensitivity in the Riverside County area as compared to the regional SCAG model. County Guidelines identifies RIVTAM as the appropriate tool for conducting VMT modeling for land use projects within the County of Riverside.

Project generated VMT has been calculated using the most current version of RIVTAM. Adjustments in socio-economic data (SED) (i.e., employment) for the Project has been made to a separate TAZ within the model to reflect the Project's industrial warehouse land use. A separate TAZ has been utilized to

[3] Page 24 of the City Guidelines

isolate vehicle trips to/from the Project. Table 1 summarizes the employment factors and employment estimates for the Project.

TABLE 1: EMPLOYMENT DENSITY FACTORS

	Project
Building Square Footage	710,736
Employment Density Factor[4]	1 employee/1,030 SF
Employment	690

Adjustments to employment for the Project's TAZ were made to the RIVTAM base year model. Project-generated home-based work VMT was then calculated following the VMT calculation procedures identified in Appendix H of the County Guidelines and includes home-based work trips that are both internal and external to the RIVTAM model boundaries. The home-based work VMT value is then normalized by dividing by the number of Project employees. As shown in Table 2, the Project generated VMT per employee is 14.02.

TABLE 2: PROJECT VMT PER EMPLOYEE

	Project
Home-based Work VMT	9,674
Employment	690
VMT per Employee	14.02

The County Guidelines identifies a threshold of 14.24 VMT per employee for office and industrial uses. The Project would not exceed the County threshold of 14.24 VMT per employee, therefore, the potential impact to VMT is less than significant.

PROJECT'S CUMULATIVE EFFECT ON VMT

The Technical Advisory states that "a project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact."[5] In other words, since the Project generated VMT is less than significant and is consistent with the Light Industrial land use designation in the County of Riverside Land Use Element, the Project's cumulative effect on VMT is also presumed to be less than significant.

[4] Employee Density Factor was obtained from the County of Riverside General Plan Appendix E-2: Socioeconomic Build-Out Assumptions and Methodology (see Table E-5, Commercial Employment Factors, Page 3).
[5] Page 6 of the Technical Advisory.

INDUCED VMT

Use of VMT as an environmental impact metric for transportation projects is discretionary under the Section 15064.3 (b) (2) of the CEQA Guidelines:

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

The Technical Advisory states that building new roadways, adding roadway capacity in congested areas, or adding roadway capacity to areas where congestion is expected in the future, typically induces additional vehicle travel. The addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, or lanes through grade-separated interchanges as project types that would likely lead to a measurable and substantial increase in induced vehicle travel. Further, the Technical Advisory acknowledges that addition of capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis.

The Project is proposing to construct site adjacent roadways including sidewalk and bicycle lanes consistent with the Riverside County General Plan. The construction of these site adjacent roadway facilities consistent with the general plan is not likely to significantly alter regional or interregional travel.

If you have any questions, please contact me directly at (949) 480-7788.

Respectfully submitted,

URBAN CROSSROADS, INC.

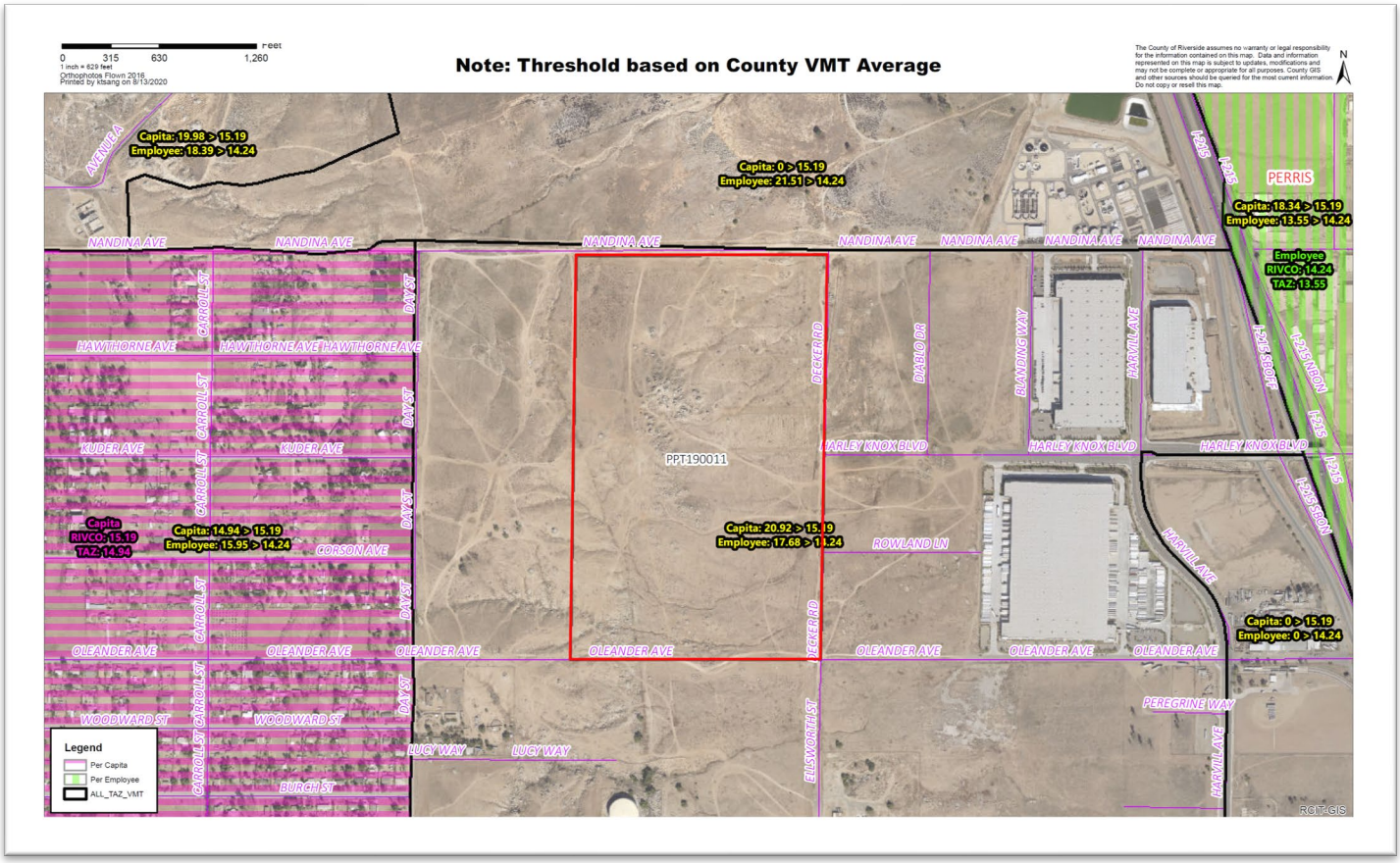
Aric Evatt, PTP
President

Robert Vu, PE
Transportation Engineer

REFERENCES

1. **Institute of Transportation Engineers.** *Trip Generation Manual.* 10th Edition. 2017.
2. **Urban Crossroads, Inc.** *Oleander Business Plark Traffic Impact Analysis.* County of Riverside : s.n., August 2019.
3. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.

ATTACHMENT A
MAP-BASED VMT SCREENING RESULTS



NOTE: This map indicates VMT generated by land use assumptions contained within individual traffic analysis zones (TAZs) in the RIVTAM base year model as compared to the applicable County threshold. For example, Employee: 17.68>14.24 indicates that the land use represented in the subject TAZ generates 17.68 average VMT per employee and the County's threshold is 14.24 average VMT per employee.