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RUBIDOUX COMMERCE CENTER VEHICLE MILES TRAVELED (VMT) ANALYSIS

Mr. Matt Englhard,

Urban Crossroads, Inc. is pleased to provide the following Vehicle Miles Traveled (VMT) Analysis for the Rubidoux Commerce Center development (**Project**), which is located which is located northwest of Avalon Street and 26th Street in the City of Jurupa Valley.

PROJECT OVERVIEW

It is our understanding that the project is to consist of five (5) industrial buildings totaling 1,188,715 square feet on approximately 80.8 acres (see Exhibit 1).

EXHIBIT 1: PRELIMINARY SITE PLAN

BACKGROUND

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, requiring 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**) (1). Based on the Technical Advisory, the City of Jurupa Valley adopted their Traffic Impact Analysis Guidelines – Methodologies and Requirements for General Plan Compliance Analysis and CEQA VMT Analysis (November 2020) (2) (**City Guidelines**), which documents the City's adopted VMT analysis methods and impact thresholds. These adopted City Guidelines have been utilized to prepare this VMT analysis.

VMT SCREENING

The City Guidelines list screening steps that can be used to identify when a proposed land use development project is anticipated to result in a less than significant impact, thereby eliminating the need to conduct a project-level VMT analysis. To aid in the screening process, the City of Jurupa Valley utilizes the Western Riverside Council of Governments (**WRCOG**) VMT Screening Tool (**Screening Tool**). The web-based Screening Tool allows a user to select an assessor's parcel number (APN) to determine if a project's physical location meets one or more of the land use screening methods documented in the City Guidelines. The City of Jurupa Valley VMT screening steps, as described within the City Guidelines, are listed below:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Project Type Screening

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

TPA SCREENING

Consistent with guidance identified in the City Guidelines, 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:

[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.").

- 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.

Based on the Screening Tool, the Project is not located within a TPA. (See Attachment A).

TPA screening criteria is not met.

LOW VMT AREA SCREENING

The City Guidelines state 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. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area."[3] The Project's physical location was selected in the Screening Tool to determine project generated VMT as compared to the City's impact threshold. Based on the Screening Tool results, The Project is not located in a low VMT area (See Attachment A).

Low VMT Area screening criteria is not met.

PROJECT TYPE SCREENING

The City Guidelines identify that local serving retail less than 50,000 square feet or other local serving essential services (e.g., local parks, 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. The Project does not intend to develop any local serving retail uses.

Additionally, the City Guidelines also indicate that projects generating fewer than 250 daily vehicle trips may be presumed to have a less than significant impact. 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, 11th Edition, 2021 (3). The proposed Project exceeds 250 daily vehicle trips (See Attachment B).

Project Type screening criteria is not met.

Based on a more detailed review of the applicable VMT screening methods, it was determined that the Project is not eligible for screening and therefore, VMT analysis should be performed.

[3] City Guidelines; page 16.

VMT ANALYSIS

VMT MODELING

The City Guidelines identify RIVCOM as the appropriate tool for conducting VMT analysis for land development projects in the City of Jurupa Valley. RIVCOM 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. RIVCOM is a travel forecasting model that represents a sub-area (Riverside County) of the Southern California Association of Governments (SCAG) regional traffic model. RIVCOM was designed to provide a greater level of detail and sensitivity in the Riverside County area as compared to the regional SCAG model.

VMT METRIC AND SIGNIFICANCE THRESHOLD

Based on the City Guidelines, a land use project in the City of Jurupa Valley shall use the efficiency metric VMT per employee as the appropriate measure of VMT for purposes of determining a potential transportation impact.

More specifically, the City has adopted the following impact threshold for land use projects:

- For office and industrial projects, its net VMT per employee exceeds the City's average VMT per employee.

For projects not consistent with the RTP/SCS the City Guidelines identify cumulative impact threshold as follows:

- For office and industrial projects its cumulative project-generated VMT per employee exceeds the average VMT per employee for Jurupa Valley in the RTP/SCS horizon year.

To make an impact determination for the previously described impact criteria, the City of Jurupa Valley's average VMT per employee must be calculated for Baseline (2022) and Cumulative (2045) conditions using the RIVCOM model. Baseline 2021 year as noted by City Guidelines will be the year consistent with the Notice of Preparation year. The Citywide averages were derived by using the base year and cumulative year unmodified model results. All the City of Jurupa Valley TAZs in RIVCOM (61 in total) were isolated and combined and divided by their respective denominator. Then a straight-line interpolation was calculated to obtain Baseline 2021 values. Table 2 presents the resulting impact thresholds used for this analysis.

TABLE 2: CITYWIDE AVERAGES

	Baseline (2022)	Cumulative (2045)
Employees	28,267	31,890
VMT	1,355,141	1,510,852
VMT per Employee	48.0	47.4

As shown in Table 2, the City of Jurupa Valley's Baseline average VMT per employee is 48.0 and, while Cumulative average VMT per employee is 47.4.

PROJECT LAND USE CONVERSION

In order to measure Project VMT per employee, land use information must first be converted into a RIVCOM compatible dataset. The RIVCOM model utilizes socio-economic data (**SED**) (e.g., population, households, employment, etc.) instead of land use information to estimate vehicle trips. SED information in the form of Project employees was included in the relevant traffic analysis zone (**TAZ**) to represent the Project. Table 1 illustrates the number of employees used to represent the Project in RIVCOM.

TABLE 1: EMPLOYMENT DENSITY FACTORS

Land Use	Quantity	Employment Factor[4]	Project Employees
Industrial	1,188,715 SF	1 employee per 1,030 SF	1,154

PROJECT'S WORK VMT CALCULATION AND COMPARISON TO IMPACT THRESHOLD

As stated previously, for industrial land uses in the City of Jurupa Valley the efficiency metric VMT per employee is used to evaluate project generated VMT. VMT per employee is obtained by dividing project generated home-based work VMT by the number of Project employees. Home-based work VMT is obtained from the RIVCOM model using the Production/Attraction (**PA**) method for calculating VMT, which sums all weekday VMT generated by trips with at least one trip end in the study area (i.e., Project's TAZ). Productions are land use types that generate trips (residences), and attractions are land use types that attract trips (employment). Productions and attractions are converted from person trips to vehicle trips for the purposes of calculating VMT and are then multiplied by the distance skims to calculate VMT. A summary of RIVCOM's output data can be found in Attachment C. Table 2 presents Project generated PA home-based work VMT for RIVCOM base year (2018), cumulative year (2045), and baseline year (2022) scenarios, the estimated number of Project employees, and the resulting VMT per employee.

TABLE 2: PROJECT HBW VMT PER EMPLOYEE

	Base Year	Cumulative Year	Baseline
Home-Based Work VMT	42,121	42,236	42,121
Employment	1,154	1,154	1,154
VMT per Employee	36.5	36.6	36.5

Table 3 provides a comparison between Project VMT per employee to the City's significance threshold for both baseline and cumulative conditions. As shown in Table 3, Project generated VMT per employee is below the City's adopted thresholds by 24.0% in the baseline condition and 22.8% in the cumulative condition.

[4] County of Riverside General Plan; Appendix E-2, Table E-5

TABLE 3: PROJECT VMT PER EMPLOYEE COMPARISON

	Baseline	Cumulative
City Threshold	48.0	47.4
Project	36.5	36.6
Percent Below Threshold	-24.0%	-22.8%
Potentially Significant?	No	No

PROJECT'S CUMULATIVE EFFECT ON VMT

The Project effect on VMT was performed using boundary VMT within Jurupa Valley City limits boundary. Table 4 presents for No Project and With Project boundary VMT for horizon-year.

TABLE 4: BOUNDARY VMT SUMMARY

	City Boundary	
Horizon-Year	No Project	With Project
Service Population	148,779	149,933
Boundary VMT	5,157,444	5,157,695
Change in Boundary VMT	251	
VMT per Service Population	34.7	34.4
Change in VMT per SP	-0.3	

As shown in Table 4, the Project does not increase the VMT per service population. Therefore, the cumulative effect on VMT is considered less than significant.

CONCLUSION

Based on the results of this analysis the following findings are made:

- The Project was evaluated against screening criteria as outlined in the City Guidelines. The Project was not found to meet any available screening criteria, and a VMT analysis was performed.
- The Project's VMT analysis found the Project to be below the City's VMT per employee threshold by 24.0% for baseline (2022) conditions and 22.8% for cumulative (2045) conditions.
- The Project's cumulative effect on VMT as measured by comparing Citywide VMT per service Population for Cumulative (2045) No Project and With Project conditions were evaluated. The Project was not found to increase Citywide VMT per service population as compared to the No Project conditions.
- The Project's impact on VMT is considered less than significant.

If you have any questions, please contact me directly at aso@urbanxroads.com.

Respectfully submitted,

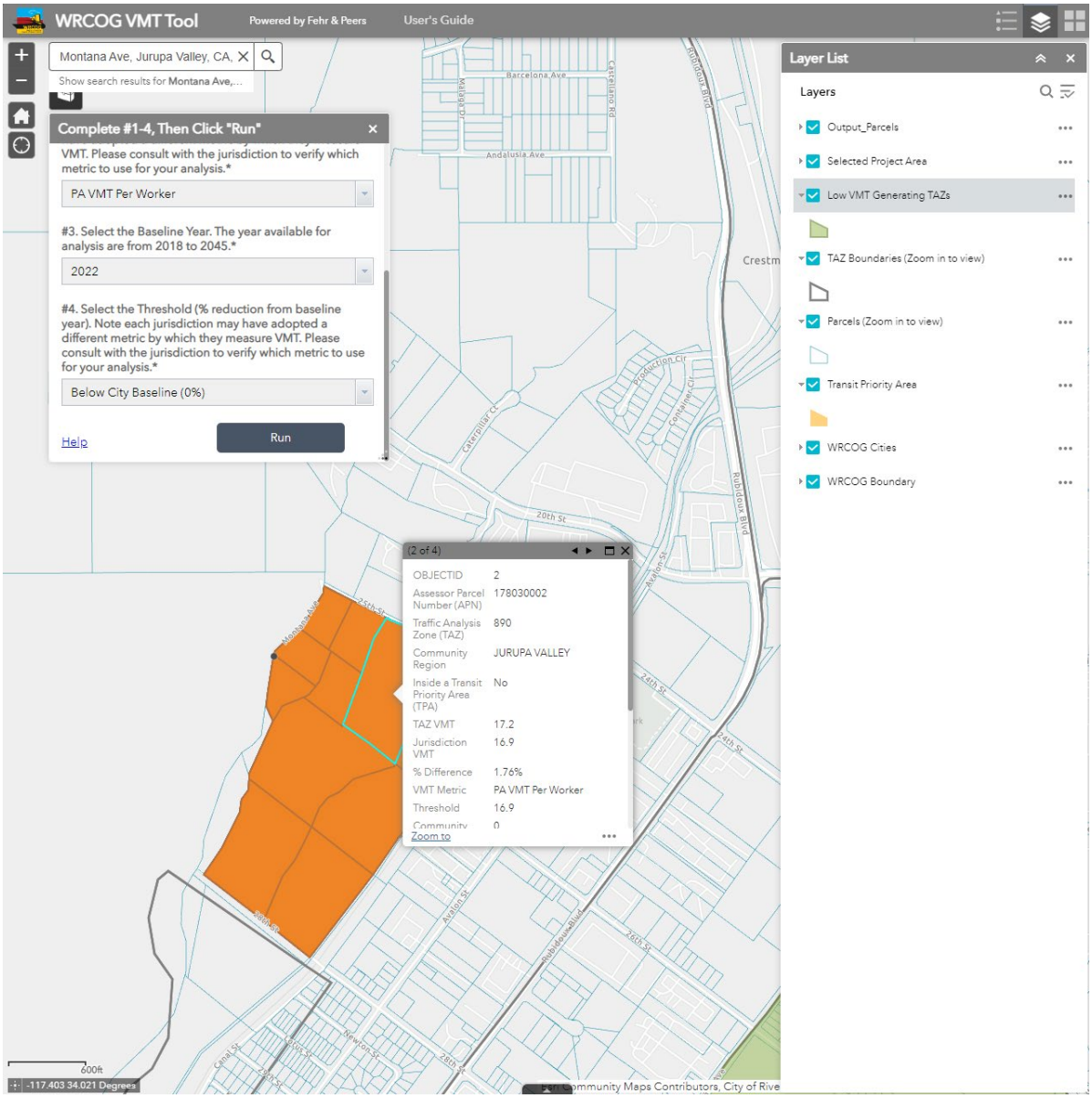
URBAN CROSSROADS, INC.

Alexander So
Senior Associate

REFERENCES

1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
2. **City of Jurupa Valley.** *Traffic Impact Analysis Guidelines.* November 2020.
3. **Institute of Transportation Engineers.** *Trip Generation Manual.* 11th Edition. 2021.

ATTACHMENT A
WRCOG SCREENING TOOL


WRCOG VMT Tool
Powered by Fehr & Peers
User's Guide
Montana Ave, Jurupa Valley, CA,
Show search results for Montana Ave,...
Complete #1-4, Then Click "Run"
VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*
PA VMT Per Worker
#3. Select the Baseline Year. The year available for analysis are from 2018 to 2045.*
2022
#4. Select the Threshold (% reduction from baseline year). Note each jurisdiction may have adopted a different metric by which they measure VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*
Below City Baseline (0%)
Help
Run
Layer List
Layers
Output_Parcels
Selected Project Area
Low VMT Generating TAZs
TAZ Boundaries (Zoom in to view)
Parcels (Zoom in to view)
Transit Priority Area
WRCOG Cities
WRCOG Boundary
(2 of 4)
OBJECTID 2
Assessor Parcel Number (APN) 178030002
Traffic Analysis Zone (TAZ) 890
Community Region JURUPA VALLEY
Inside a Transit Priority Area (TPA) No
TAZ VMT 17.2
Jurisdiction VMT 16.9
% Difference 1.76%
VMT Metric PA VMT Per Worker
Threshold 16.9
Community 0
Zoom to
Barcelona Ave
Andalusia Ave
Rubidoux Blvd
Caterpillar Ct
Production Cir
Container Cir
20th St
Avalon St
24th St
25th St
26th St
Newton St
Canal St
600ft
-117.403 34.021 Degrees
Community Maps Contributors, City of Rive

ATTACHMENT B
PROJECT TRIP GENERATION

TABLE B-1: PROJECT TRIP GENERATION

Land Use	Quantity	Units[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Actual Vehicles:									
General Light Industrial	594.358	TSF							
Passenger Cars:			383	50	433	51	329	380	2,746
2-axle Trucks:			1	0	1	1	0	1	26
3-axle Trucks:			1	1	2	1	1	2	32
4+-axle Trucks:			2	1	3	2	2	4	94
Total Truck Trips (Actual Vehicles):			4	2	6	4	3	7	152
Total Trips (Actual Vehicles)[2]			387	52	439	55	332	387	2,898
Manufacturing	594.357	TSF							
Passenger Cars:			297	89	386	129	293	422	2,556
2-axle Trucks:			2	1	3	1	2	3	46
3-axle Trucks:			2	2	4	2	2	4	56
4+-axle Trucks:			7	5	12	5	7	12	168
Total Truck Trips (Actual Vehicles):			11	8	19	8	11	19	270
Total Trips (Actual Vehicles)[2]			308	97	405	137	304	441	2,826
Passenger Cars			680	139	819	180	622	802	5,302
Trucks			15	10	25	12	14	26	422
Total Trips (Actual Vehicles)[2]			**695**	**149**	**844**	**192**	**636**	**828**	**5,724**

[1] TSF = thousand square feet

[2] Total Trips = Passenger Cars + Truck Trips.

ATTACHEMENT C
RIVCOM VMT OUTPUT DATA

TABLE 1: 2018 RIVCOM OUTPUT

TAZ	890
Daily_Home-Based (incl. IEHB) Prod VMT	51394.26563
Daily_HBW (incl. EIHBW) Attr VMT	39713.18359
Daily_Total Auto OD From VMT	53126.38281
Daily_Total Auto OD To VMT	47386.83594
Daily_Total Auto OD Intra VMT	10.223686
Daily_Total Truck OD From VMT	12028.77148
Daily_Total Truck OD To VMT	12047.63281
Daily_Total Truck OD Intra VMT	17.683519
Daily_Total OD From VMT	65155.14844
Daily_Total OD To VMT	59434.46875
Daily_Total OD Intra VMT	27.907206
Daily_Total_TripLen	14.835389
Population	0
Employment	1087
Enrollment	0

TABLE 2: 2045 RIVCOM OUTPUT

TAZ	890
Daily_Home-Based (incl. IEHB) Prod VMT	74436.53906
Daily_HBW (incl. EIHBW) Attr VMT	39754.33594
Daily_Total Auto OD From VMT	66153.78125
Daily_Total Auto OD To VMT	57508.32031
Daily_Total Auto OD Intra VMT	12.609428
Daily_Total Truck OD From VMT	10465.19336
Daily_Total Truck OD To VMT	10540.93262
Daily_Total Truck OD Intra VMT	15.386827
Daily_Total OD From VMT	76618.97656
Daily_Total OD To VMT	68049.25781
Daily_Total OD Intra VMT	27.996258
Daily_Total_TripLen	13.308115
Population	0
Employment	1087
Enrollment	0

It should be noted that the number of employees input into the model is lower than the estimated employees of the proposed Project. However, the nominal increase in employment does not alter the trip lengths and travel patterns of the Project's TAZ that would affect the analysis findings.