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Mr. Matt Englhard
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SUBJECT: TEMESCAL VALLEY BUSINESS PARK VEHICLE MILES TRAVELLED (VMT) ANALYSIS

Dear Mr. Matt Englhard:

The following Vehicle Miles Travelled (VMT) Analysis has been prepared for the proposed Temescal Valley Business Park development (**Project**), which is located south of Dawson Canyon Road and east of Temescal Canyon Road in the County of Riverside.

PROJECT OVERVIEW

The Project is proposed to consist of a 181,500 square foot delivery station. Trips generated by the Project's proposed land uses have been estimated based on 85% of the peak seasonal data as provided by the proposed tenant operator. The proposed Project is anticipated to generate a total of 3,016 vehicle trip-ends per day (expressed in actual vehicles). (1) It should be noted that the Project analyzed represents the peak season which is anticipated to occur a few weeks a year. Typical operations of the site will require fewer employees and as a result generate fewer vehicle trips and reduced daily VMT as compared to the conservative analysis presented within this report.

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**). (2) The County of Riverside Based on OPR's Technical Advisory, has developed and adopted their own Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled (December 2020) (**County Guidelines**). (3) The recently adopted County Guidelines were used to prepare this evaluation.

PROJECT SCREENING

Consistent with County Guidelines, projects should evaluate available screening criteria based on their location and project type to determine if a presumption of a less than significant transportation impact can be made. The following project screening thresholds were selected for review base on their applicability to the proposed Project:

- Transit Priority Area (TPA) Screening
- Map-Based Screening
- Small Project 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.

MAP-BASED SCREENING

The Technical Advisory notes that "residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit

[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.").

similarly low VMT."[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.

SMALL PROJECT SCREENING

The County Guidelines identify that projects that generate fewer than 110 daily vehicle trips 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 greenhouse gas (GHG) emissions less than 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO2e) per year are also assumed to cause a less than significant transportation impact. The Project is estimated to generate vehicle trips in excess of the 110 daily trip threshold and would generate GHG emissions that exceed 3,000 MTCO2e per year.

The Small Project screening threshold is not met.

PROJECT GENERATED VMT

County Guidelines state that project's that do not meet one or more of the VMT screening criteria described previously 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 have 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 isolate vehicle trips to/from the Project. Table 1 summarizes the employment estimates for the Project. To provide a reasonably conservative estimate of potential transportation impacts, Riverside County Transportation staff requested that the traffic impact analysis utilize employment rates reflecting the

[3] Page 12 of the Technical Advisory

85th percentile of peak seasonal activity for both warehouse workers as well as delivery drivers. Table 1 presents the 85th percentile of peak season employment.

TABLE 1: EMPLOYMENT DENSITY FACTORS

	Project
Employment[4]	906

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 E 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 21.78.

TABLE 2: PROJECT VMT PER EMPLOYEE

	Project
Home-based Work VMT	19,733
Employment	906
VMT per Employee	21.78

PROJECT GENERATED VMT ASSESSMENT

As noted in the County Guidelines, the Project results in a significant project generated VMT impact if the base model year project generated VMT per employee exceeds the existing County of Riverside VMT per employee. The County Guidelines identifies a threshold of 14.24 VMT per employee for office and industrial uses.[5] Table 3 provides a comparison of the Project generated VMT per employee as compared to the County's threshold.

TABLE 3: PROJECT VMT PER EMPLOYEE COMPARISON

	Base Year
County Threshold	14.24
Project VMT per Employee	21.78
Percent Change	+52.9%
Potentially Significant?	Yes

[4] Employment data provided by the Project applicant.
[5] Figure 6 – VMT Threshold of Significance of the County Guidelines

As shown in Table 3, the Project generated VMT per employee values would exceed the County's adopted threshold by 52.9%. The transportation impact based on the assessment of Project generated VMT as compared to the County's adopted threshold is potentially 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."[6] In other words, since the Project generated VMT per employee efficiency metric as compared to the County's impact threshold is potentially significant, the Project's cumulative effect on VMT is also presumed to be potentially significant.

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 the 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 roadway improvements on the southern and eastern side of Dawson Canyon Road, including sidewalk and bicycle lanes consistent with the Riverside County General Plan. The Project is also proposing to realign and construct Temescal Canyon Road on the Project's southern boundary consistent with the Riverside County General Plan. The construction of these site adjacent roadway facilities consistent with the general plan is not expected to significantly

[6] Page 6 of the Technical Advisory.

alter regional or interregional travel as they would not provide new or significantly enhanced capacity to a regional highway corridor.

POTENTIAL VMT REDUCTION STRATEGIES

Consistent with County Guidelines, VMT reduction strategies should be considered to address project generated VMT that exceeds the County's threshold. The following transportation demand management (TDM) strategies have been evaluated for the purpose of reducing VMT impacts determined to be potentially significant.

- Mitigation Measure 1 – Commute Trip Reduction Program: Employee-focused travel behavior change program that targets individuals' attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. Examples of potential CTR program features include the following:
    1. Designated Employee Transportation Coordinator (ETC)
        - Role of ETC is to provide education and point of contact for commute related questions and commuter benefits.
    2. Marketing of Commuter Benefits for Employees
        - ETC to provide new hire commuter benefit materials.
        - On-site message board (physical or digital) to educate employees of commuter benefits.
    3. Pre-Tax Transit Pass Benefits
        - Employees to have access to WageWorks (or comparable) to purchase transit passes or other approved commuter expenses pre-tax.
    4. Bicycle Parking
        - On-site secure bike parking facilities and storage lockers
    5. Carpool and Vanpool Ride-Matching Services
        - Waze Carpool and other carpool/vanpool ride-matching services
    6. Guaranteed Ride Home (GRH) Program
        - Employer funded GRH program for employees arriving to work by carpool, vanpool, or transit and need to leave work early or are unable to use normal commute accommodations.
        - Provided via local transportation network companies.

    Remarks: The Project would implement the CTR program features described previously to discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling,

taking transit, walking, and biking. This measure is evaluated as means of providing up to a maximum VMT reduction of 21%.[7]

CONCLUSION

In summary, the Project VMT per employee was found to exceed the County of Riverside VMT per employee threshold by 53%. Even with implementation of the feasible TDM measures discussed above, Project VMT would only be reduced by a maximum of 21.0%, which would not reduce Project generated VMT per employee to a level of less than significant.

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

Respectfully submitted,

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President

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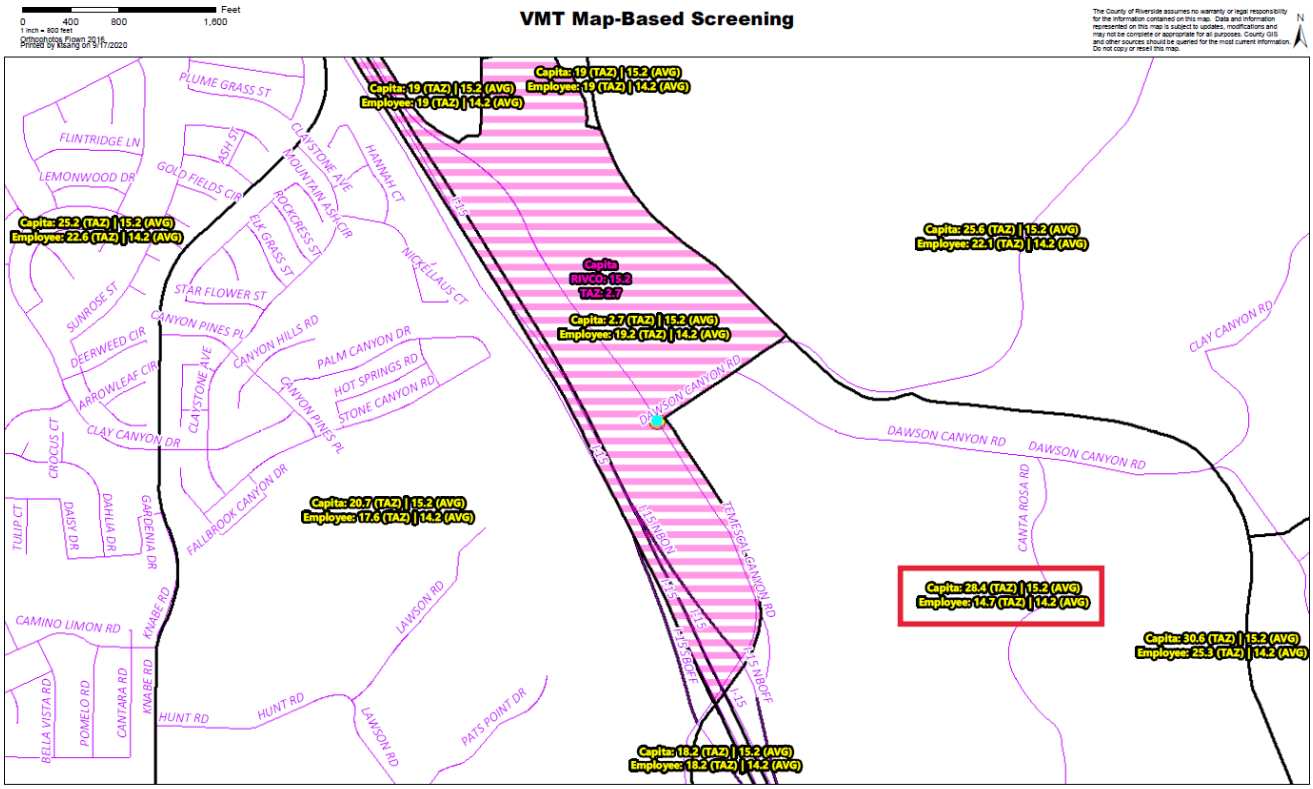
[7] Page 225 of the Quantifying Greenhouse Gas Mitigation Measures A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures; August 2010, CAPCOA.

REFERENCES

1. **Urban Crossroads, Inc.** *Temescal Valley Business Park.* County of Riverside : s.n., September 2020.
2. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
3. **County of Riverside.** *Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled.* County of Riverside : s.n., December 2020.

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.