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Date: April 2, 2021

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Subject: ***Vehicle Miles Traveled (VMT) Assessment for the Proposed
Sky Canyon Retail Center Project, Riverside County***

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As requested, Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit this Vehicle Miles Traveled (VMT) Assessment Technical Memorandum for the proposed Sky Canyon Retail Center project (herein after referred to as Project) in the County of Riverside, California. This Technical Memorandum presents the VMT screening criteria and applies the criteria, accordingly. It should be noted that the approach and methodology outlined in this Technical Memorandum is based on the County of Riverside *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled (December 2020)* and is generally consistent with the *Technical Advisory for Evaluating Transportation Impacts In CEQA*, published by the Governor's Office of Planning and Research (OPR), December 2018 (OPR Technical Advisory), which provides additional detail on the language and approach described in this Technical Memorandum.

On December 28, 2018, the California Natural Resources Agency adopted revised CEQA Guidelines. Among the changes to the guidelines was the removal of vehicle delay and LOS from consideration for transportation impacts under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled. Lead agencies are allowed to continue using their current impact criteria, or to opt into the revised transportation guidelines. However, the new guidelines must be used starting July 1, 2020, as required in CEQA section 15064.3. As we understand it, the County of Riverside is in the process of updating its transportation impact criteria to be consistent with the CEQA revisions.

In late 2019, State courts stated that under section 21099, subdivision (b)(2), existing law is that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects.

As a result of SB 743, the new metric in the CEQA guidelines for transportation impacts is VMT per capita. The legislative intent of SB 743 is to balance the needs of congestion management with statewide goals for infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

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Under the VMT methodology, screening is used to determine if a project will be required to conduct a detailed VMT analysis.

The County of Riverside has developed a SB 743 VMT Impact Screening Criteria to serve as a screening tool for potential VMT impacts associated with select land use projects in the County of Riverside. As such, the following guidance summarizes the potential project screening and would be presumed to cause less-than-significant impact, as shown in *Figure 3* of the County of Riverside *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled*:

- ***Small Projects***, of which includes but not limited to, projects that generate less 110 average daily trips (ADT).
- ***Projects Near High Quality Transit***, which includes projects within a ½ mile of an existing major transit stop and maintains a service frequency interval of 15 minutes or less during the morning and evening peak commute periods.
- ***Local-Serving Retail***, which includes projects with no single store on-site exceeds 50,000 SF and the project is local-serving as determined by the Transportation Department.
- ***Affordable Housing***, which includes projects with a high percentage of affordable housing as determined by the Riverside County Planning and Transportation Departments.
- ***Local Essential Service***, which includes projects that are considered local-serving as determined by the Transportation Department; such as day care centers, K-12 schools, Police and Fire facilities, Medical/Dental office buildings less than 50,000 SF, Government offices, and Local or Community Parks.
- ***Map Based Screening***, which includes projects within areas of development that are under the threshold as shown on the screening map as allowed by the Transportation Department.
- ***Redevelopment Projects***, which includes projects that replace an existing VMT-generating land use and does not result in a net overall increase in VMT.

The County of Riverside has developed a SB 743 VMT Impact Screening Tool to serve as a screening tool for potential VMT impacts associated with select land use projects in the unincorporated area of Riverside County. Based on direction per the

County of Riverside, a significant impact would occur for non-residential projects if the listed condition below is met:

- Project Level Impact: The jurisdictional average 2012 home-based work VMT per worker (VMT per worker) of the project is higher than the existing VMT per worker for the jurisdiction of **14.24 VMT per worker**.

The proposed Project, which consists of a 51,927 square-foot (SF) shopping center (with multiple buildings all less than 50,000 SF) and an express car wash with a 130 foot tunnel, is located within a “low VMT-generating TAZ” as provided in the County of Riverside 743 VMT Impact Screening Tool, which shows the VMT per worker of **11.32 VMT/worker**. In addition, the proposed land use is consistent with the existing land use in the surrounding area, which satisfies the secondary screening steps. Also, given that the Project is considered local-serving and has no single store greater than 50,000 SF, the Project will also screen out per the local-serving retail project screening criteria.

CONCLUSION

Consistent with the County of Riverside *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled (December 2020)*, the proposed Sky Canyon Retail Center Project will result in a less-than-significant transportation impact based on the County of Riverside SB 743 VMT Impact Screening Tool and local-serving retail project criteria.

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We appreciate the opportunity to provide this Technical Memorandum. Should you have any questions regarding the memorandum, please contact us at (949) 825-6175.

Cc: File

