

May 27, 2021

Ms. Kaitlyn Dodson-Hamilton
Tom Dodson & Associates
PO Box 2307
San Bernardino, CA 92406-2307

SUBJECT: COTTONWOOD VILLAGE VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION

Dear Ms. Kaitlyn Dodson-Hamilton:

The following Vehicle Miles Traveled (VMT) Screening Evaluation has been prepared for the proposed Cottonwood Village development (**Project**), which is located north of Cottonwood Avenue and east of Perris Boulevard in the City of Moreno Valley.

PROJECT OVERVIEW

The Project is proposing to develop 23 4-plex structures which consist of 92 multifamily (low-rise) residential dwelling units.

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 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 OPR's Technical Advisory, the City of Moreno Valley adopted City of Moreno Valley Traffic Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment (June 2020) (**City Guidelines**) (2). To aid in the project-level VMT screening process the City of Moreno 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 thresholds documented in the City Guidelines.

PROJECT SCREENING

The County Guidelines provides details on appropriate screening criteria that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed analysis. Screening thresholds are broken into the following three steps:

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

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

TPA SCREENING

Consistent with guidance identified in the Technical Advisory, County Guidelines note that 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.

Based on the Screening Tool results presented in Attachment A, the Project site is not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor.

TPA screening criteria 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.”).

LOW VMT AREA SCREENING

City Guidelines also states 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 City uses the WRCOG screening tool to determine low areas of VMT. The screening tool uses the sub-regional Riverside Transportation Analysis Model (RIVTAM) to measure VMT performance within individual traffic analysis zones (TAZs) within the region. The Project’s physical location based on parcel number is input into the Screening Tool to determine project generated VMT as compared to the City’s impact threshold. The parcel containing the proposed Project was selected and measure of VMT used is VMT per capita based on the Project’s residential land use. The Project resides within TAZ 3,806 and based on the screening tool was found to generate 8.43 VMT per capita, whereas the City’s impact threshold (i.e., City of Moreno Valley VMT per capita) is 12.79 VMT per capita. As a secondary check, the underlying land use assumptions contained within TAZ 3,806 were also reviewed to ensure that the Project’s land use is consistent with that modeled within its respective TAZ. TAZ 3,806 was found to include significant levels of population and households, which is consistent with the Project's intended residential land use.

Low VMT Area screening criteria is met.

PROJECT TYPE SCREENING

The City 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 (i.e., fewer than 400 daily trips) and by association low greenhouse gas (GHG) emissions are also assumed to cause a less than significant impact. Trips generated by the Project’s proposed land use have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017. (3) The Project is anticipated to generate 674 vehicle trip-ends per day above the 400 daily trip threshold. (See Attachment B)

Project Type screening criteria is not met.

³ City Guidelines; page 23.

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CONCLUSION

Based on our review of applicable VMT screening thresholds, the Project meets the Project Type screening. The project would therefore be assumed to result in a less than significant VMT impact; no additional VMT analysis is required.

If you have any questions, please contact me directly at 949-660-1994.

Respectfully submitted,

URBAN CROSSROADS, INC.

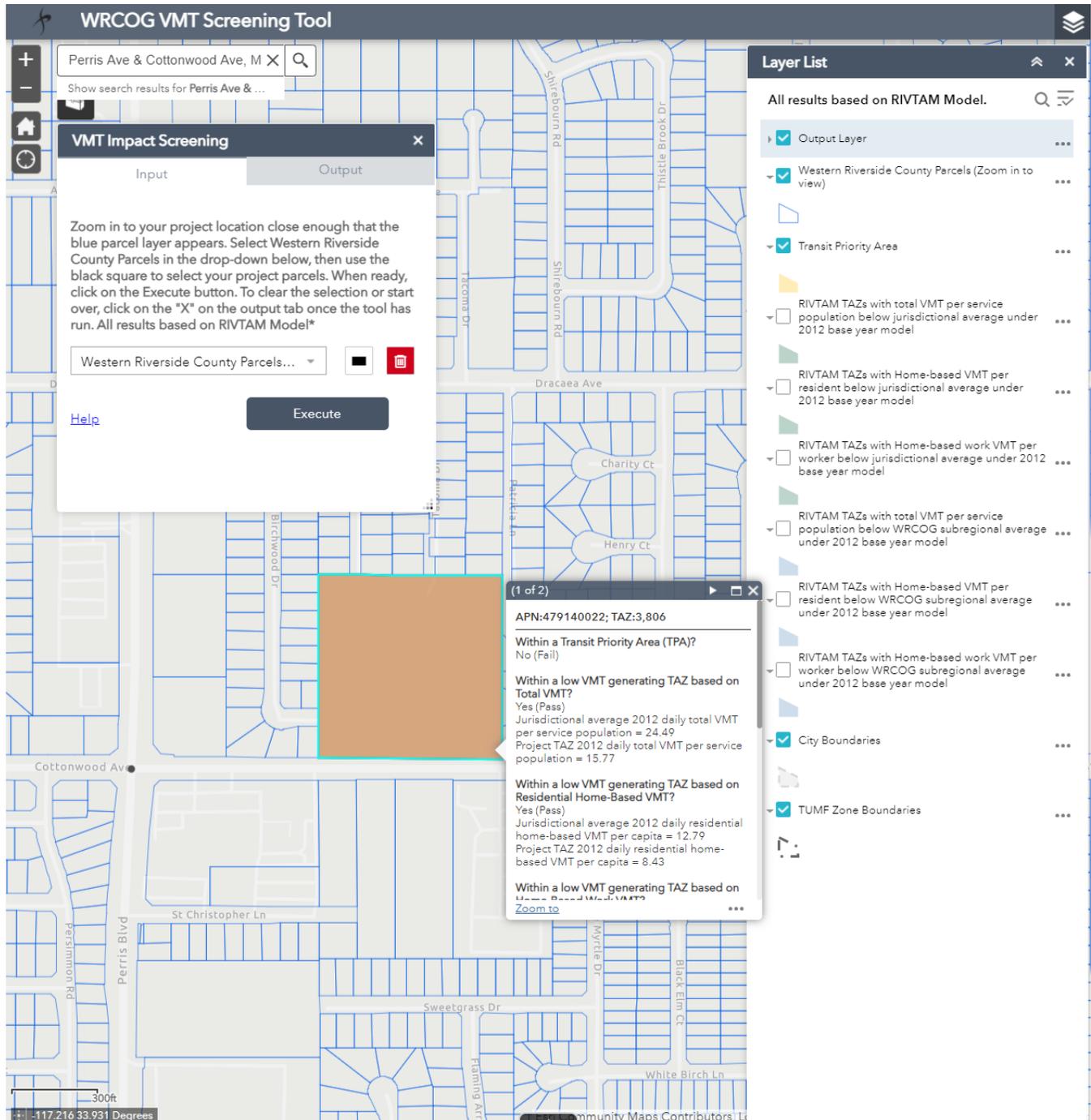


Alexander So
Senior Analyst

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 Moreno Valley.** *Traffic Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment.* City of Moreno Valley : s.n., June 2020.
3. **Institute of Transportation Engineers.** *Trip Generation Manual.* 10th Edition. 2017.

**ATTACHMENT A:
WRCOG SCREENING TOOL**



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**ATTACHMENT B:
PROJECT TRIP GENERATION**

TABLE 1: PROJECT TRIP GENERATION SUMMARY

Land Use ¹	ITE LU Code	Units ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Trip Generation Rates:									
Multifamily Housing (Low-Rise)	220	DU	0.11	0.35	0.46	0.35	0.21	0.56	7.32

Land Use ¹	Quantity Units ²	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Project Trip Generation Summary:								
Multifamily Housing (Low-Rise)	92 DU	10	33	43	32	19	51	674

¹ Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).

² DU = Dwelling Units