First Hathaway Logistics Center
VMT Assessment

City of Banning

March 13, 2023

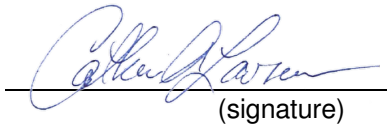
Prepared for:

First Industrial Realty Trust, Inc.

Prepared by:

Stantec Consulting Services Inc.

This document entitled First Hathaway Logistics Center VMT Assessment was prepared by Stantec Consulting Services Inc. ("Stantec") for the account of First Industrial Realty Trust, Inc. (the "Client"). The material in it reflects Stantec's professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not take into account any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others. Any use which a third party makes of this document is the responsibility of such third party. Such third party agrees that Stantec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on this document.

Prepared by  (signature)

Cathy Lawrence, PE
949-923-6064

Reviewed by  (signature)

Daryl Zerfass, PE, PTP
949-923-6058

Table of Contents

LIST OF FIGURES

LIST OF APPENDICES

1.0 PROJECT DESCRIPTION

Stantec Consulting Services Inc. (Stantec) has performed a Vehicle Miles Traveled (VMT) analysis for the proposed First Hathaway Logistics Center (Project). The Project is proposed for a site on the east side of Hathaway Street within the City of Banning. The site was previously referred to as the Stagecoach Business Park, and the previously proposed land use on the site was an on-line auto auction facility and industrial park. The current Project proposes a logistics center.

Senate Bill 743 (SB 743) has established VMT as the metric for identifying California Environmental Quality Act (CEQA) transportation impacts. To comply with the requirements of SB 743, the City of Banning has defined the conditions for conducting CEQA VMT analysis, which are documented in the City's *Traffic Impact Analysis Guidelines*[1] (City Guidelines). This report summarizes the analysis of the Project consistent with those guidelines.

1.1 PROJECT LOCATION AND DESCRIPTION

The Project site is located in the eastern area of the City of Banning on approximately 83 acres on the east side of Hathaway Street between Nicolet Street and the future extension of Wilson Street. **Figure 1** illustrates the Project's location.

The Project would consist of one 1.42 million square feet (MSF) logistics building and associated truck docks, trailer, and office parking. The proposed site plan is illustrated in **Figure 2**. The main building would be accessed by driveways on the future extension of Nicolet Street, Hathaway Street, and the future extension of Wilson Street. There would be two parcels located on the south side of the future extension of Nicolet Street, one of which would be used for passenger vehicle parking and the other which would be used for trailer parking. As shown in the Project's Local Transportation Analysis (LTA)[2], the Project is estimated to generate approximately 1,989 average daily vehicle trips (ADT).

The Project site is currently undeveloped. Residential homes are located west of the site, and vacant land is located on the north, east, and south sides of the Project site, with the exception of a Caltrans maintenance yard located south of the site. The Interstate 10 (I-10) Freeway is located just south of the Project site.

[1] City of Banning. Traffic Impact Analysis Guidelines for Local Transportation Analysis and Vehicle Miles Traveled Analysis. October 2021.
[2] Stantec. First Hathaway Logistics Center Local Transportation Analysis. March 2023. Table 4-1.

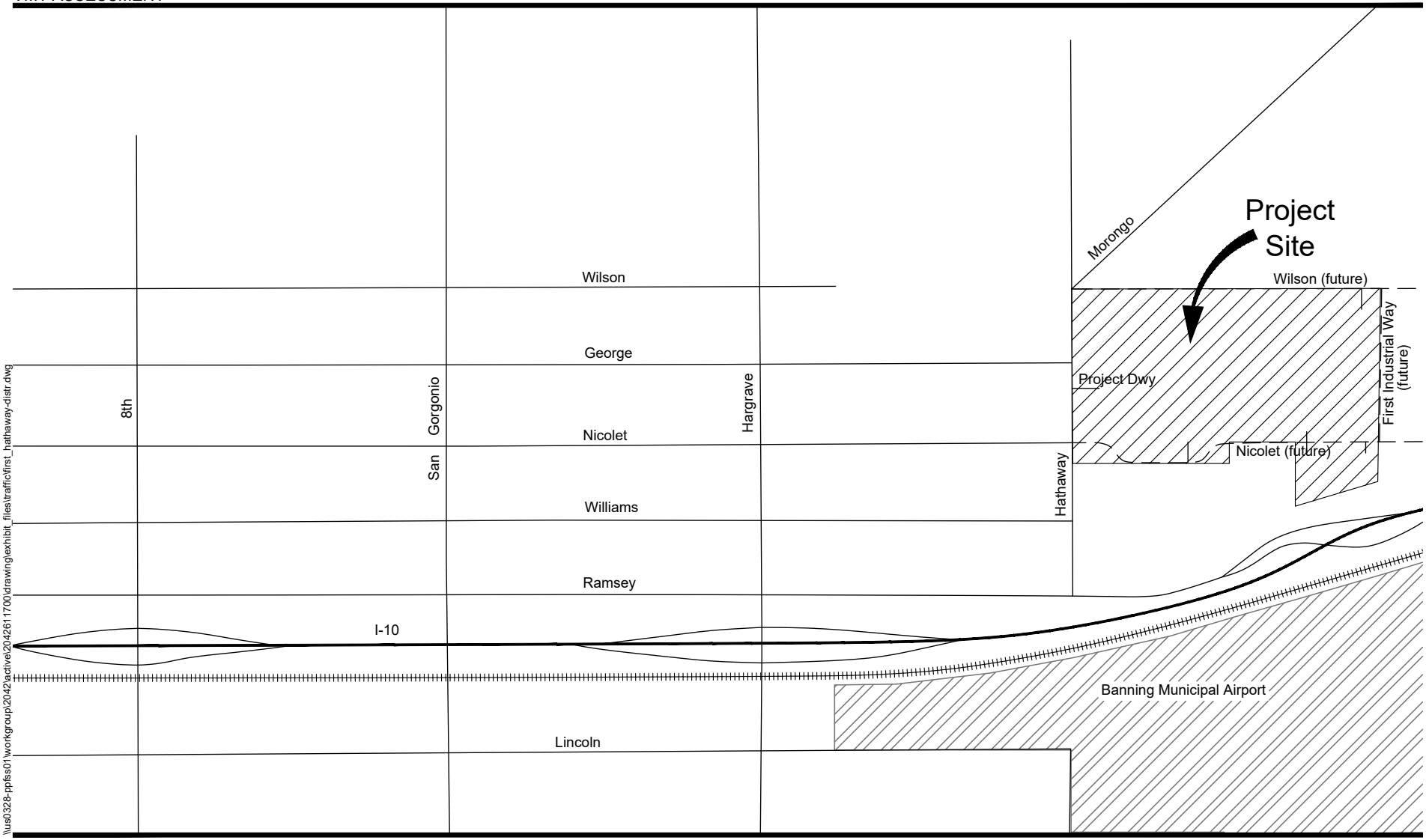
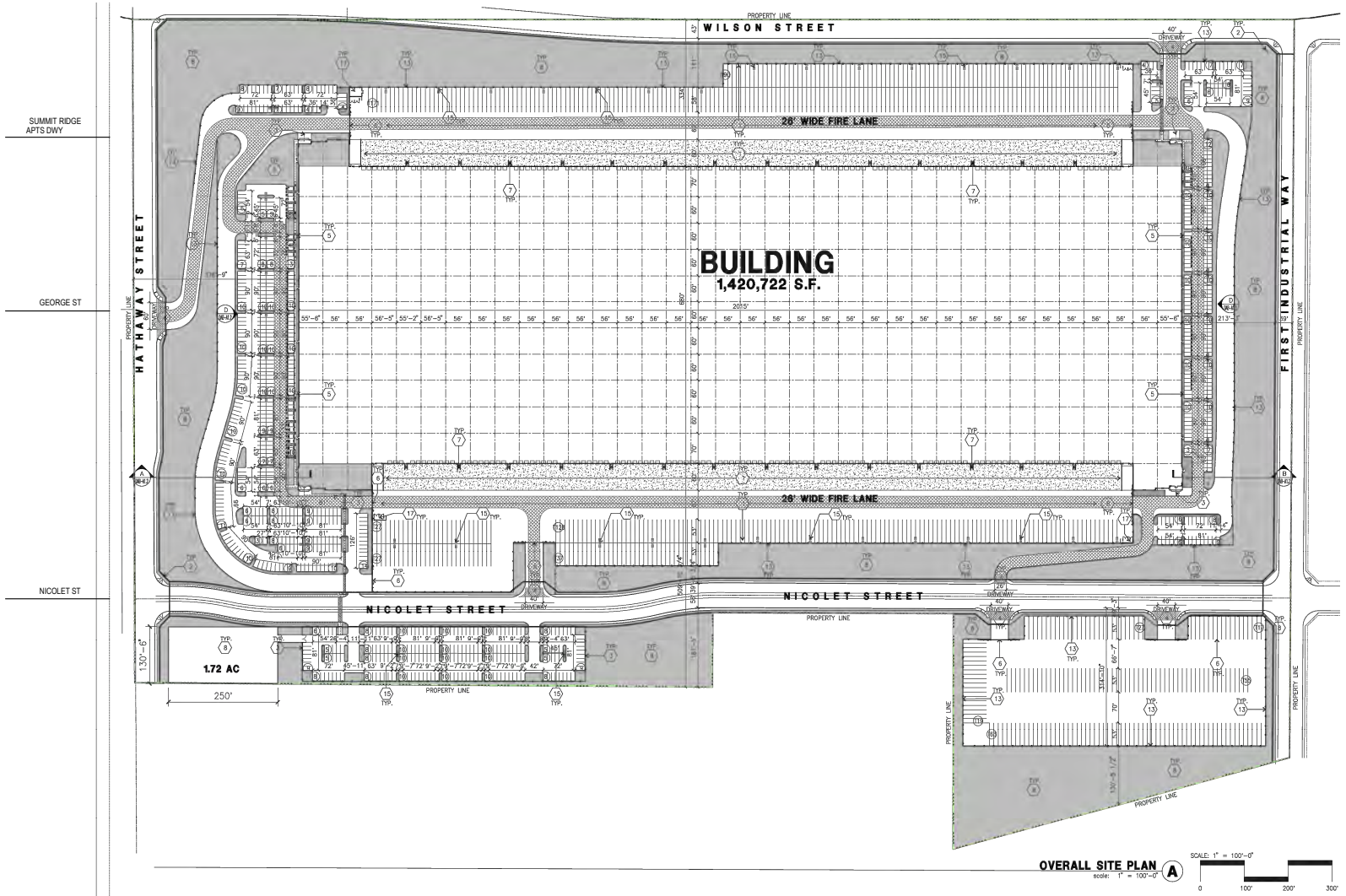


Figure 1
Project Location and Vicinity Map



Source: HPA Architecture

\\us0328-ppfss01\workgroup\2042\active\204261700\drawing\exhibit_files\traffic\first_hathaway-site_plan.dwg

N

Figure 2
Proposed Site Plan

1.2 EXISTING AND PROPOSED LAND USE AND ZONING

The Project site covers approximately 83 acres and includes several parcels. The existing land use designation is Business Park, and the proposed land use is Warehouse. The existing and proposed zoning designation is Business Park. The Project will not change the existing zoning designation.

2.0 VMT SCREENING METHODOLOGY

The City has identified the Western Riverside Council of Governments (WRCOG) as the region for VMT analysis purposes. WRCOG uses an online tool to evaluate whether proposed development projects would generate VMT impacts. The WRCOG data is based on the Riverside County Transportation Model (RIVCOM) travel demand forecasting model.

Certain projects may be screened out of SB 743-related VMT analysis requirements due to a presumption of less than significant impact. If the project passes the screening criteria, no additional analysis is required, and the project is presumed to have a less than significant transportation impact.

Development projects that satisfy one or more of the following properties are presumed to have a less than significant VMT:

1. Project is located within one-half mile of a Transit Priority Area or a High-Quality Transit Corridor as defined by the Governor's Office of Planning and Research (OPR), is consistent with the City's General Plan and zoning, has a floor area ratio (FAR) greater than 0.75, provides less parking than or equal to the City's Municipal Code requirements, and does not replace any affordable housing units with moderate- or high-income residential units.
2. Residential, office, industrial, or mixed-use project is located in an area with low VMT and which incorporate similar features.
3. Local-serving retail project with less than 50,000 square feet.
4. Redevelopment project that results in equal or a net reduction in VMT.
5. Local park, daycare center, student housing on or adjacent to a college campus, local-serving gas station, bank, and K-12 public school project.
6. Institutional/government and public service project such as a police station, fire station, community center, or refuse station.
7. Project has 100 percent affordable housing units.

8. Project generates fewer than 500 daily vehicle trips (for projects requiring a General Plan Amendment (GPA)) and fewer than 1,000 daily trips (for projects that do not require a GPA).

The Project does not satisfy any of the above screening criteria; therefore, a VMT analysis is required.

3.0 PROJECT VMT ANALYSIS METHODOLOGY

Since the Project does not satisfy the screening criteria, a detailed VMT analysis is required. The process consists of establishing the Project VMT, identifying the VMT threshold, assessing potential impact, and, if necessary, proposing feasible mitigation measures.

The appropriate VMT metric for evaluating the Project is prescribed by the City's guidelines. Residential projects are evaluated based on VMT per capita, office projects use VMT per employee, land use plans (e.g., General Plans and Specific Plans) use VMT per service population, and retail projects use total VMT. For other project types, such as the proposed logistics use, the City Guidelines have identified the metric of no net change in VMT per employee (for the WRCOG regional average) as indicating a significant impact for uses consistent with the General Plan[3]. VMT per employee is determined for this assessment from model data produced by RIVCOM.

Once the land use and VMT metric are identified, the Project-generated VMT is compared to the appropriate significance threshold. The City has defined the significance thresholds for each VMT metric. If the Project VMT is less than the significance threshold, the Project is presumed to create a less than significant impact, and no further VMT analysis is required. If the Project VMT is greater than the significance threshold, mitigation measures would be required.

4.0 PROJECT VMT THRESHOLDS

For logistics land uses such as the proposed Project, the City's guidelines specify that the metric for evaluation of potential impact is VMT per employee. The Project is consistent with the General Plan designation for the site; therefore, the City's guidelines state that the threshold of significance is "no net change in VMT per employee"[4].

The average VMT per employee for the WRCOG region is 30.42 as obtained from RIVCOM and shown in Figure 4A of the City Guidelines[5]. Therefore, for the Project to result in "no net change in VMT per employee", the Project VMT would need to be at or below the threshold of 30.42 VMT per employee (a reduction in average VMT per employee would not be considered a significant impact).

[3] City Guidelines. page i.
[4] Ibid.
[5] City Guidelines. page 17.

5.0 IDENTIFICATION OF VMT IMPACTS

The WRCOG VMT calculator tool[6] specifies that the average VMT per employee for the Project site is 33.6 (see **Appendix A**) based on data from RIVCOM. The VMT per employee for the Project site is 10.5 percent above the average VMT per employee for the region (30.4 VMT per employee) as shown in Table 5-1. Therefore, the Project site does not meet the City's impact threshold of no net increase in VMT per employee, which results in a significant impact. The following section identifies measures to reduce the Project's VMT impact.

Table 5-1 Project VMT Summary

	Project
Threshold of Significance (Regional Average)	30.4
Project VMT per Employee	33.6
Percent Above/Below Threshold	+10.5%
Significant Impact?	Yes

6.0 MITIGATION MEASURES

The City of Banning has identified several VMT reducing treatments that non-residential land development projects can implement to reduce the amount of VMT per employee[7]. The City Guidelines also state the percentage reduction in VMT which could reasonably be expected with the implementation of each measure based on analysis published by the California Air Pollution Control Officers Association (CAPCOA). Following is a list of potential VMT reducing measures that could feasibly be implemented by a logistics development such as the Project:

- Provide pedestrian network improvements (0.00% - 2.00% reduction in VMT)
- Provide bike parking and end-of-trip facilities (lockers, showers, etc.) for bicycle commuters (0.625% reduction in VMT)
- Implement or provide access to a voluntary commute reduction program (1.00% - 6.20% reduction in VMT)
- Provide teleworking options (0.07% - 5.50% reduction in VMT)
- Implement preferential parking program for carpools and vanpools (variable reduction in VMT)

[6] WRCOG VMT Calculator Tool. Accessed February 10, 2023. https://wrcog.us/310/SB-743.
[7] City Guidelines. October 2021. Appendix A, Table A, Appendix B, Table B.

- Provide bicycling network improvements (negligible reduction in VMT)

Since the occupant and type of use of the logistics building is not known at this time, the specific effectiveness of the above measures cannot be quantified with certainty. By adopting these strategies, it is reasonable to conclude that the Project would reduce the amount of VMT per employee. However, since the resulting Project VMT per employee with the above VMT reducing measures might not be below the City's impact threshold of 30.4 VMT per employee, the Project's impact would be considered significant and unavoidable.

7.0 CONCLUSIONS

The Project is located on the east side of Hathaway Street between Wilson Street and Nicolet Street and consists of 1.42 MSF of logistics space. The Project is consistent with the City's General Plan designation for the site; however, the Project does not satisfy the City's VMT screening criteria. Therefore, the Project's VMT per employee was calculated and compared with the City's VMT impact threshold.

The City's significance threshold for non-residential land uses that are consistent with the General Plan, such as the proposed logistics use, is "no net change in VMT per employee". The average VMT per employee for the WRCOG region is 30.4 as obtained from RIVCOM and shown in Figure 4A of the City Guidelines. Therefore, for the Project to result in "no net change in VMT per employee", the Project VMT would need to be at or below the threshold of 30.04 VMT per employee (a reduction in average VMT per employee would not be considered a significant impact).

A VMT analysis of the Project site using data from the WRCOG VMT calculator tool indicates that the average VMT per employee for the Project site is 33.6, which is 10.5 percent over the threshold of significance. With mitigation measures that are feasible for a project of this type, the Project's VMT per employee would be reduced. However, since the resulting Project VMT per employee with the VMT reducing measures might not be below the City's impact threshold of 30.4 VMT per employee, the Project's impact would be considered significant and unavoidable.

Appendix A WRCOG VMT CALCULATOR TOOL RESULTS

Western Riverside Council of Governments VMT Tool

Project Information

Project Name

First Hathaway Logistics

Parcel Number (RIVCOM TAZ#41)	Analysis Year
532110002	2025

Screening Criteria for Banning

Use the online WRCOG VMT Tool to determine the following

Is the Project screened by Transit Priority Area or located in a low VMT generating zone?	No
Is the Project one of these land use types? (show land use types)	No
Does the project generate fewer than 110 daily trips? (enter project land use in the section below)	No

The Project does not meet screening criteria. Please Continue

Project Land Use Information

		Unit
Residential : Single Family Homes	0	Dwelling Units
Residential : MultiFamily Homes	0	Dwelling Units
Office	0	1,000 Square Feet
Retail	0	1,000 Square Feet
Industrial	1421	1,000 Square Feet
Manufacturing	0	1,000 Square Feet
Warehousing	0	1,000 Square Feet
Hotel	0	Rooms
University	0	Students
Private School	0	Students

Project Trips, VMT, and TAZ SED Information

Project Summary

Select VMT Methodology: Production Attraction (PA)

Select OD Method for mixed-use projects

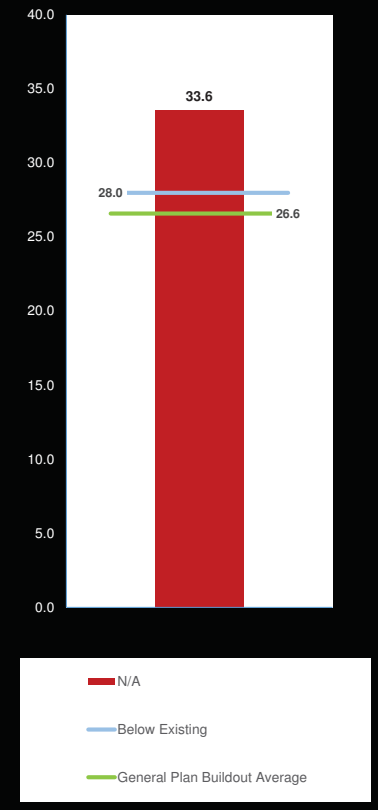
Project Location TAZ Socioeconomic Data: 2045 RIVCOM Model

Land Use			Value	Unit
SFDU	-	Single-Family Detached Housing	0	DU
MFDU	-	Multi-Family Attached Housing	0	DU
K12	-	Kindergarten - 12th Grade Enrollment	0	STU
COLLEGE	-	College Enrollment	0	STU
AG	-	Agricultural & Mining Employment	84	EMP
CONST	-	Construction Employment	26	EMP
MANU	-	Manufacturing Employment	7	EMP
WHOLE	-	Wholesale Employment	0	EMP
RET	-	Retail Employment	0	EMP
TRANS	-	Transportation, Warehousing, and Utility Employment	26	EMP
INFOR	-	Information Services Employment	0	EMP
FIRE	-	Financial Activities Employment	3	EMP
PROF	-	Professional and Business Services Employment	3	EMP
EDUC	-	Educational and Health Services Employment	0	EMP
ARTENT	-	Arts/Entertainment Employment	0	EMP
OTHSER	-	Other Services Employment	3	EMP
PUBADMN	-	Public Administration Employment	0	EMP

Project VMT Thresholds Comparison

Select the VMT Thresholds for comparison to project VMT

- [X] Below Existing
- [X] Better than General Plan Buildout
- [ ] OPR Guidance (15% Below Existing)



ver. 2021.11.24