



---

April 13, 2021

Mr. Joel Morse  
T&B Planning Inc.  
3200 El Camino Real, Suite 100  
Irvine, CA 92602

**SUBJECT: GLEN IVY SENIOR COMMUNITY VEHICLE MILES TRAVELLED (VMT) ANALYSIS**

Dear Mr. Joel Morse:

The following Vehicle Miles Travelled (VMT) Analysis has been prepared for the proposed Glen Ivy Senior Community development (**Project**), which is located west of Temescal Canyon Road, between Trilogy Parkway and Glen Ivy Road in the County of Riverside.

## **PROJECT OVERVIEW**

The Project is proposed to consist of 141 assisted living dwelling units (109 standard assisted living dwelling units and 32 memory care dwelling units) and 75 senior adult housing attached dwelling units. Trip generation for the assisted living use will consist of 129 beds for the standard assisted living and 35 memory care beds for a total of 164 beds. However, for the purposes of this VMT analysis, the previous plan (which is more conservative) has been evaluated, which consists of 130 beds of assisted living use and 35 memory care beds for standard assisted living for a total of 165 beds plus the 76 senior adult housing attached dwelling units. 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, 10<sup>th</sup> Edition, 2017. (1) The proposed Project is anticipated to generate a total of 712 vehicle trip-ends per day (expressed in actual vehicles). (2)

## **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 2018) (**Technical Advisory**). (3) Based on OPR's Technical Advisory, the County of Riverside has developed and adopted their Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled (December 2020) (**County Guidelines**). (4) The newly adopted County Guidelines were used to prepare this evaluation.

Consistent with County Guidelines, projects that meet certain screening criteria based on their location and project type may be presumed to result in a less than significant transportation impact. Consistent with the County Guidelines, the following project screening thresholds that may be applicable to the Project:

- Transit Priority Area (TPA) Screening
- Local-Serving retail
- Map-Based 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 County Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing “major transit stop”<sup>1</sup> or an existing stop along a “high-quality transit corridor”<sup>2</sup>) 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.**

### **LOCAL-SERVING RETAIL**

The County 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 and by association low greenhouse gas (GHG) emissions are also assumed to cause a less than significant impact. The County’s

---

<sup>1</sup> 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.”).

<sup>2</sup> 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.”).

small project and local essential service threshold does not currently include assisted living or senior housing.

**The Project Type screening threshold is not met.**

### **MAP-BASED SCREENING**

The County Guidelines notes 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.”<sup>3</sup> County Guidelines also note that the use of map-based screening for low VMT generating areas is also applicable for other residential uses such as the Project. 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 15.2 VMT per capita.<sup>4</sup>

**The Low VMT Area screening threshold is not met.**

### **PROJECT GENERATED VMT**

Project’s that do not meet VMT screening criteria 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 to socio-economic data (SED) (i.e., population and households) for the Project has been made to a separate TAZ within the model to isolate vehicle trips to/from the Project. As the County’s General Plan land use to SED conversion factors do not identify a modified household size for senior housing, the standard average household size of 3.60 persons per household was used as it provides a more conservative analysis. Table 1 summarizes the population density factors and capita estimates for the Project.

---

<sup>3</sup> Page 24 of the Technical Advisory.

<sup>4</sup> Figure 6 – VMT Threshold of Significance of the County Guidelines.

**TABLE 1: POPULATION DENSITY FACTORS**

	Project	
Units	165 beds	76 dwelling units
Average Household Size Factor <sup>5</sup>	1 persons/1 bed	3.60 persons/1 household
Capita	165 persons	274 persons
Total Capita	439 persons	

Adjustments to population and households for the Project’s TAZ were made to the RIVTAM base year model. Project-generated home-based residential VMT was then calculated following the VMT calculation procedures identified in Appendix E of the County Guidelines and includes home-based residential trips that are both internal and external to the RIVTAM model boundaries. The home-based residential VMT value is then normalized by dividing by the number of Project capita (i.e., population). As shown in Table 2, the Project generated VMT per capita is 10.41.

**TABLE 2: PROJECT VMT PER CAPITA**

	Project
Home-based Residential VMT	4,572
Capita	439
VMT per Capita	10.41

The County Guidelines identifies a threshold of 15.2 VMT per capita for residential uses. The Project would not exceed the County threshold of 15.2 VMT per capita, therefore, the potential impact to VMT is less than significant.

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

Respectfully submitted,

URBAN CROSSROADS, INC.



Aric Evatt, PTP  
 President



Alex So  
 Senior Analyst

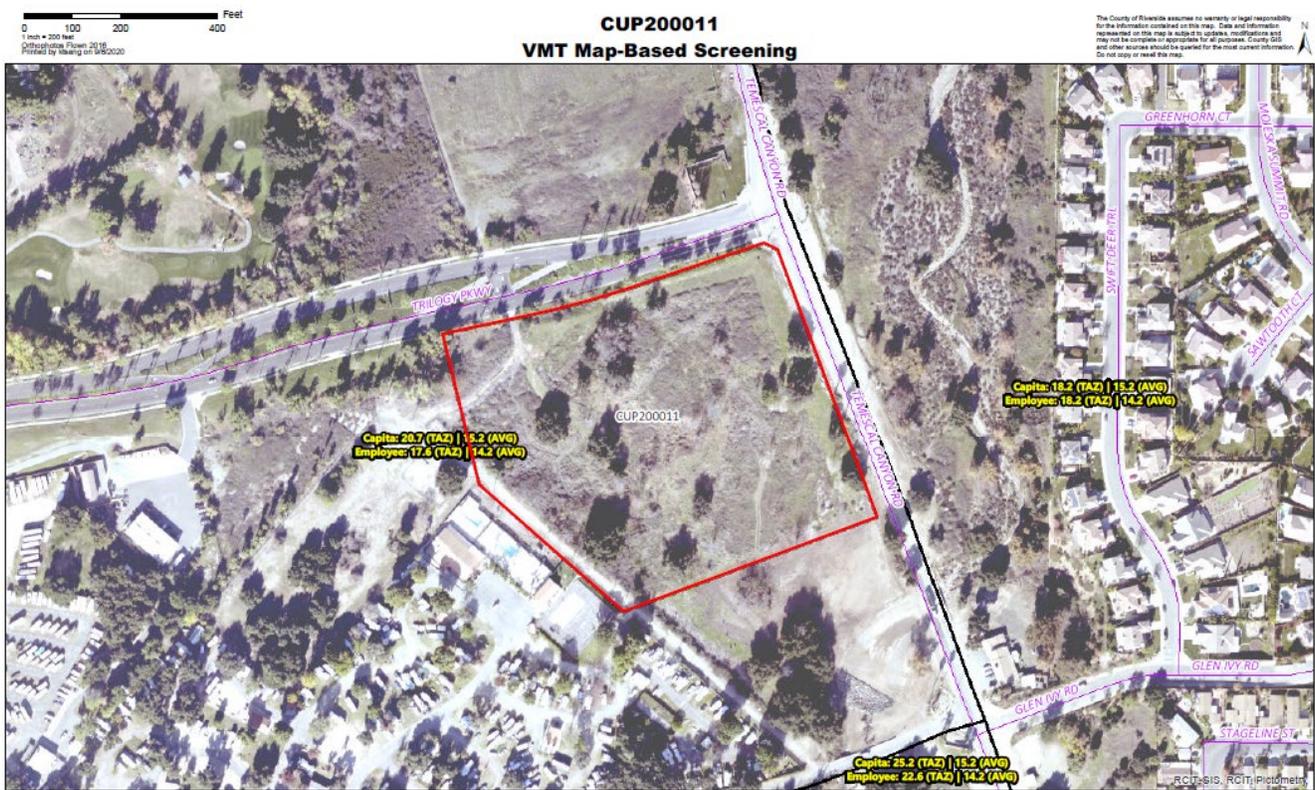
<sup>5</sup> Average Household Size Factor was obtained from the County of Riverside General Plan Appendix E-2: Socioeconomic Build-Out Assumptions and Methodology (see Table E-2, Average Household Size by Area Plan for Temescal Canyon area, Page 2).

Mr. Joel Morse  
T&B Planning Inc.  
April 13, 2021  
Page 5 of 5

## REFERENCES

1. **Institute of Transportation Engineers.** *Trip Generation Manual.* 10th Edition. 2017.
2. **Urban Crossroads, Inc.** *Glen Ivy Senior Community.* County of Riverside : s.n., September 2020.
3. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
4. **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.