

Appendix J1 Wine Country Specific Plan VMT Analysis

Appendices

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Memorandum

To/Attention JoAnn Hadfield **Date** June 7, 2023
From Mike Arizabal, IBI Group **Project No** 140177
cc
Subject Wine Country Specific Plan VMT Analysis

IBI Group is pleased to provide this Vehicle Miles Traveled (VMT) Analysis for the Wine Country Specific Plan in Yucaipa. The VMT analysis was prepared to be consistent with the City's CEQA assessment as part of their Traffic Impact Guidelines (Fehr & Peers, August 2020). This technical memorandum includes a description of the project, VMT background, VMT screening criteria, VMT impact thresholds, and VMT analysis.

The purpose of this memorandum is to qualitatively evaluate VMT impacts of the net change between the buildout of General Plan EIR and the Specific Plan (Proposed Project), consistent with Senate Bill 743 (SB 743) and CEQA Guidelines Section 15064.3. Per CEQA Guidelines Section 15064.3(b)(4), the lead agency has discretion to choose the most appropriate methodology and can use its professional judgment based on substantial evidence to adjust its analysis accordingly.

PROJECT DESCRIPTION

The Wine Country Specific Plan area is generally bounded by Oak Glen Road to the south, Ivy Street to the north, Fremont Street to the west, and the El Dorado Park to the east. The current site is mostly vacant with the exception of a few single-family residences and three chicken ranch facilities and is primarily surrounded by residential land uses.

The development encompasses 1,093.6 acres, where all of the site is currently zoned for residential development. The Wine Country Specific Plan proposes roughly 574.4 acres for residential and 546.2 acres for non-residential uses consisting of agriculture, riparian areas, and a water district). The Specific Plan includes the following land uses:

- Residential – 1,089 dwelling units (single-family homes)
- Vineyards & Wineries – 464.5 acres:
 - Micro Wineries – 12 wineries on sites that are 2.5 acres or greater
 - Artisan Wineries – 10 wineries on sites that are 5 acres or greater with events up to 75 guests
 - Boutique Wineries – 4 wineries on sites that are 10 acres or greater with events up to 150 guests

The Wine Country Specific Plan does not propose to change the number and type of residential dwelling units analyzed as part of the City's General Plan Update Appendix H Traffic Impact Analysis (December 2015). Although the density will be increased from the currently zoned 1 dwelling unit per acre to up to 4.6 dwelling units per acre, this increase in residential density is accomplished through consolidating the residential areas and therefore does not change the

number of trips or the associated trip lengths. Furthermore, the 2015 General Plan Update identified a 4 percent reduction of VMT per capita under Buildout conditions.

As such, the VMT analysis focuses solely on the vineyard and winery components of the Specific Plan, which represents the net change from the land use scenario previously analyzed in the 2016 General Plan Update (Post-2040 General Plan Buildout conditions).

CEQA GUIDELINES ON ANALYZING VMT

The updated CEQA Guidelines, which were adopted in December 2018, went into effect on July 1, 2020. These updated guidelines require all lead agencies to adopt VMT as the new measure for identifying transportation impacts for land use projects. VMT has been adopted as the new measure, in place of the previous metric of automobile delay-based level of service (LOS). Further information on the updated guidelines is available in the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018), released by the Governor's Office of Planning and Research (OPR)¹. The City of Yucaipa also developed their own *Traffic Impact Guidelines* that were adopted in August 2020.

Section 15064.3 of the CEQA Guidelines gives agencies options in assessing transportation impacts with respect to VMT. The lead agency has discretion to choose the most appropriate methodology and can use its professional judgment based on substantial evidence to adjust its analysis accordingly. Where quantitative models or methods are unavailable to estimate VMT for a particular project, Section 15064.3 (b)(3) allows agencies to assess VMT qualitatively, as explained below:

"If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc."

Additionally, the Technical Advisory on Evaluating Transportation Impacts in CEQA issued by the Governor's Office of Planning and Research (OPR) in December of 2018 (Technical Advisory) provides further guidance on assessing VMT, with different methodologies, significance thresholds, and mitigation measures. The Technical Advisory adds that there are several ways to assess VMT. These include trip-based assessment, tour-based assessment, trip, and tour-based assessment, and assessing change in total VMT. The Technical Advisory states that lead agencies should analyze the effects of retail projects by assessing the change in total VMT because retail-type projects typically re-route travel from other retail destinations. A retail project may lead to increases or decreases in VMT depending on the existing travel patterns for an area.

Using estimated total change in VMT allows for analysis of whether a project is likely to divert existing trips, and what the net effect of those diversions will be on the total VMT. Similar to retail uses, the Specific Plan is likely to re-route travel from other destinations, as further explained herein; therefore, for the purposes of this memorandum, the Proposed Project will be analyzed via net change in VMT using a qualitative method.

¹ Office of Planning and Research. Technical Advisory on Evaluating Transportation Impacts in CEQA. State of California: s.n., December 2018.

CITY OF YUCAIPA TRAFFIC IMPACT ANALYSIS GUIDELINES

The City's Traffic Impact Analysis Guidelines were adopted in August of 2020 and include the methodology for a CEQA-level VMT analysis. The guidelines include the required steps for a comprehensive evaluation of both qualitative and quantitative analysis of traffic related impacts. Evaluation criteria and performance metrics of determining whether a project has a significant impact on the environment are provided pursuant to CEQA. For the purposes of SB 743 compliance, the City's guidelines state that a VMT analysis should be conducted for land use projects, as deemed necessary by the Engineering Services Division, and would apply to projects that have the potential to increase the average VMT per service population (e.g., population plus employment) compared to the City boundary. The SB 743 and City Guidelines provide details on appropriate "screening criteria" that can be used to identify when a proposed land use development project is anticipated to result in a less-than significant impact without conducting a more detailed analysis.

Screening thresholds are broken into the following categories:

- Transit Priority Area
- Low VMT Area
- Project Type

A land use component need only meet one of the above screening thresholds to result in a less-than-significant impact. For non-screened developments or projects exempt from CEQA, the City requires a VMT analysis and forecasting through the San Bernardino Traffic Analysis Model (SBTAM) to determine significance.

The guidelines go on to note that the City of Yucaipa is currently a bedroom community. As such, employment uses that create opportunities for the community to stay local should generally reduce trip lengths and reduce VMT. As such, the analyst should review VMT from employment uses and verify that the results match the City's expectations related to increased employment uses within the City. The City maintains discretion on the appropriateness of a qualitative vs quantitative analysis based on project characteristics.

Transit Priority Area Screening

Consistent with the City's Guidelines, projects located within a half mile area of an existing "major transit stop"² or an existing stop along a high-quality transit corridor may be presumed to have a less than significant impact absent substantial evidence to the contrary.

Based on the Screening Tool, the Project site is not located within ½ mile of either an existing major transit stop or an existing stop along a high-quality transit stop.

The TPA screening criterion is not met.

² 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. "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

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. A low VMT area is defined as an individual traffic analysis zone (TAZ) where total daily Origin/Destination VMT per service population is lower than the City average total daily Origin/Destination VMT per service population.

Consistent with the guidelines, the San Bernardino County Transportation Authority's (SBCTA) web-based VMT Screening Tool³ was used to identify whether the project was located within a low VMT area (based on VMT at the TAZ level). The Tool currently relies on a hybrid version of the San Bernardino Transportation Analysis Model (SBTAM), which uses a 2016 base year consistent with the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and a 2040 forecast year consistent with the 2040 RTP/SCS. The tool concluded that the project is not located in a low VMT area.

The Low VMT Area screening criterion is not met.

Project Type Screening

The City Guidelines identify that the following may be presumed to have a less than significant impact as their uses are often local serving.

- Local Parks
- Day Care Centers
- Local-serving retail less than 50,000 square feet, including:
 - Gas Stations
 - Banks
 - Restaurants
 - Shopping Center
- Local-serving medical office less than 100,000 square feet
- Student housing projects on or adjacent to college campuses
- Local-serving assembly uses (places of worship, community organizations)
- Community institutions (Public libraries, fire stations, local government)
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- Hotels (non-destination or resort; no banquet or special event space)
- Affordable or supportive housing
- Assisted living facilities

³ <https://sbcta.maps.arcgis.com/apps/webappviewer/index.html?id=779a71bc659041ad995cd48d9ef4052b>

- Senior housing (as defined by HUD)
- Projects generating less than 400 daily vehicle trips
 - This generally corresponds to the following “typical” development potentials:
 - 42 single family housing units
 - 54 multi-family, condominiums, or townhouse housing units
 - 41,000 sq. ft. of office
 - 80,000 sq. ft. of light industrial
 - 229,000 sq. ft. of warehousing
 - 85,000 sq. ft. of high cube transload and short-term storage warehouse

Any project that uses the designation of “local-serving” will be required to demonstrate that its users (employees, customers, visitors) would be existing within the community. As such, the project would not generate new “demand” for the project land uses, but the land use meets existing demand that would shorten the distance that residents, employees, customers, or visitors would otherwise travel.

Project Trip Generation (Vineyards and Wineries)

In order to determine whether the vineyard and winery components of the project meet the project type screening criteria (less than 400 daily vehicle trips), the trip generation of the project was estimated using employee estimates and trip rates from the *Napa County Winery Trip Generation Characteristics and Research* (County of Napa, Conservation, Development and Planning Department, 2019). This study was utilized in lieu of Institute of Transportation Engineers’ *Trip Generation Manual* (11th Edition, 2021), which does not include trip rates for vineyards and wineries.

Table 1 below summarizes the average daily weekday trip generation associated with the employees, visitors, and production vehicles for the 26 wineries and 464.5 acres of vineyards in the Wine Country Specific Plan. It should be noted that the trip generation associated with weekend and special event conditions do not represent “typical” conditions and therefore are not included in the analysis.

Table 1: Vineyard and Winery Average Daily Vehicle Trips

Typical Weekday Daily Trips	ADT
Number of FT Employees: 7 employees x 3.05 one-way trips per employee x 26 wineries	555
Number of PT Employees: 3 employees x 1.90 one-way trips per employee x 26 wineries	148
Average number of weekday visitors: 30 estimated visitors / 2.6 visitors per car x 2 one-way trips x 26 wineries	600
Gallons of production: Up to 25,000 / 1,000 x 0.009 truck trips x 2 one-way trips x 26 wineries	26
Total Daily Trips	1,329

The Project Type screening criterion is not met (> 400 daily trips).

VMT ANALYSIS METHODOLOGY

The methodology employed in this memorandum reference various technical studies and agency guidelines including the OPR Technical Advisory (2018), CARB Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals (revised 2019), San Bernardino County Transportation Impact Study Guidelines (2019), City of Yucaipa TIA Guidelines (2020), and Napa County Winery Trip Generation Characteristics and Research (2019).

As summarized in Section 15064.3 (b)(3) of the CEQA Guidelines, the City as the lead agency has discretion to analyze, interpret, and apply its own thresholds of significance. Where existing models or methods are not available to estimate the vehicle miles traveled for a particular project, a lead agency may analyze the project's VMT qualitatively.

The unique characteristics of wineries make it difficult for a travel model, such as SBTAM, to forecast VMT. In general, the use of the SBTAM is not appropriate to estimate VMT for the following reasons:

- The model does not capture the unique nature of wine tasting trips (not a land use in the model)
- The model only captures weekday traffic, where wineries typically generate trips on the weekend
- Inputs into the model would be purely employment based
- Comparative wineries are located outside the model's region

Since VMT does not directly measure traffic operations but instead measures network use and efficiency, the model cannot accurately account for the nuances of winery trips that are captured from existing trips throughout the region.

Use of a quick-response tool like CalEEMod or MXD+ is also deemed inappropriate for estimating VMT as the specific land use categories used as the inputs into those models do not include wineries or land uses that are similar to wineries. Although wineries have components of retail activities, the sole use of the retail land use category as part of CalEEMod or MXD does not accurately reflect the VMT associated with employees and the visitors of wineries.

In order to qualitatively account for VMT impacts, the Proposed Project must assess the net change in VMT between the previously analyzed GPEIR and the Specific Plan, answering the question "what is the net effect of the wineries and vineyards on the area's VMT?" For the purposes of this memorandum and consistent with the City's guidelines, the threshold of significance for the Specific Plan would be a net increase in total area VMT.

VMT ANALYSIS FOR NON-SCREENED DEVELOPMENT

Many factors can influence travel demand. Since VMT is a measure of travel demand, understanding the influencing factors provides a greater comprehension of VMT and the mechanisms that affect VMT. This analysis has qualitatively evaluated the area in which driving patterns may change by understanding the nature of trips generated by the winery and vineyard components of the project, its location to nearby attractions, and project features that would further reduce VMT. This method for evaluating VMT can measure if a project is likely to divert existing trips, and what the effect of those diversions will be on VMT.

Nature of Trips Generated by the Project

The Specific Plan introduces commercial and agricultural uses to intermix with the GPEIR residential components. This mixed-use environment allows for synergy amongst the commercial

and residential components of the specific plan and shortens the distance that residents would travel to commercial destinations. The proposed wineries and vineyards, as a new local attraction, would divert local and regional traffic from travelling to the nearest defined wine region of Temecula in Riverside County.

Proximity to Regional Destinations

As mentioned above, trips to the project would most likely come from the surrounding residential areas. Thus, the trip generating characteristics of the Specific Plan would not impact VMT as it would continue to capture trips that are currently being generated by the existing residents or reroute trips from more distant locations, such as Temecula in Riverside County.

Winery trips outside of the County would primarily be from Los Angeles County, Orange County, Riverside County, and San Diego County. Introducing wineries and vineyards in Yucaipa would in effect reduce the trip lengths as winery related trips would likely stay local instead of venturing out other wine areas that are further away.

Project Features that Further Reduce VMT

In addition to not having a significant impact on VMT under CEQA due to local wine tasting travel behavior, the Proposed Project should include other features that further reduce VMT and benefit the overall region. These features could include shuttle/tour services and carpooling incentives that include preferred parking. These VMT-reducing project features are supported by the OPR Technical Advisory.

The project can also designate preferred spaces for those who carpool. Spaces would also be made available to the tour companies which regularly travel through the area. In addition, wineries can incentivize carpooling and shuttle/tour services by offering free tastings in order to reduce parking demand and the overall vehicle trips through the area.

Wine tasting is often a group activity, so implementing incentives for carpooling are expected to be well received and utilized. With the group activity and convenience, these types of carpool and shuttle services are typical for wine region destinations, including the American Viticultural Areas (AVA) and sub-AVAs found in Riverside, San Luis Obispo, Napa, and Santa Barbara counties, and are typically implemented by local lodging facilities and other private enterprises. Reducing individual trips through shuttle and rideshare benefits VMT reduction for both the immediate project area and regionally as more options for ridesharing become available.

CONCLUSIONS

This memo has assessed the potential change in VMT by looking at the Specific Plan's expected impact on local VMT patterns and its impact on diverting trips from farther away destinations. The findings outlined in this memo demonstrate that the Specific Plan, as defined herein, would have a less than significant impact on VMT. The proposed winery and vineyard use cannot be evaluated with existing quantitative methods such as using the SBTAM, as these methods fail to capture the nature of winery-related trips. Therefore, the Specific Plan requires a qualitative evaluation. The qualitative analysis evaluated the nature of winery and vineyard trips, the proximity to local and regional attractions, and project features that would further reduce VMT.

It was demonstrated that the Proposed Project is not expected to impact VMT as trips generated through the project area come from existing nearby residential areas. Trips to the Proposed Project site are most likely to come from an existing diverted trip, resulting in less than significant

VMT impacts under CEQA. Furthermore, the Proposed Project is anticipated to leverage features such as shuttle/tour services and carpooling incentives which further reduce total VMT.