

October 8, 2021

Mr. Ken Jackson
PVR MANAGEMENT, LLC.
8895 Research Drive, Suite 200
Irvine, CA 92618

**Subject: Paradise Valley Ranch (CUP 210005) Vehicle Miles Traveled (VMT)
Analysis, County of Riverside, CA**

Dear Mr. Jackson:

RK ENGINEERING GROUP, INC. (RK) is pleased to submit this traffic study for the proposed Paradise Valley Ranch project.

A. Site Location

The project site is located in an unincorporated area of southwest Riverside County, east of the City of Hemet, approximately 4 miles east of State Street, at the terminus of Cactus Valley Road. The site address is 43700 Cactus Valley Road. Currently, the County of Riverside is processing a Lot Line Adjustment (LLA) involving three parcels [Assessor Parcel Numbers (APN) 569-020-024, -025, and -026] on the Paradise Valley Ranch property. Once this LLA has been processed (LLA210115), one of the three parcels (approximately 48-acres) will be used for Conditional Use Permit No. 210005.

The project site has been in operation for over 40 years serving as a Christian retreat and youth camp. The site is zoned for Rural Residential (RR) uses in the County of Riverside Zoning Map and Rural Residential (RR) and Rural Mountainous (RM) in the Riverside County Land Use Map.

Existing land uses surrounding the project site include; Rural Residential and Rural Mountainous use to the north and west, Rural Residential and Open Space Rural to the east and Rural Residential and Conservation Habitat to the south.

The project location map is provided in Exhibit A.

B. Project Description

The project consists of re-developing the existing Paradise Valley Ranch site to become the Wildfire Conservancy "Center of Excellence" west-coast facility. The facility will be dedicated to the treatment and recovery of mental and behavioral health conditions suffered by firefighters. The site will support research and training programs in partnership with the California State University system, CAL FIRE, CAL FIRE Local 2881, and the International Association of Fire Fighters (IAFF), among others. The project is expected to have a maximum of 64 employees on-site.

The project is also proposing to develop approximately 55,236 square feet of land for private photovoltaic energy development. The total project site area is approximately 48 acres.

Construction of the project is estimated to begin in the year 2021 and expected to last approximately 15 months. Approximately 37,130 square feet of new building area will be constructed as part of the project. The project is not expected to require the import or export of earthwork material.

Once operational, the total building area of the project would be approximately 69,146 square feet and include approximately 112 beds. Existing on-site amenities, which will remain operational include: 3 pools, 2 man-made lakes, pool house, gym, rock-climbing wall, basketball/tennis court, batting cages, barn and horse stables, and hiking trails/roads.

Table 1 provides a summary of the project land uses and building area.

The site plan used for this analysis, provided by JW ARCHITECTS, is illustrated in Exhibit B.

Table 1
Land Use Summary

Land Use	Status	Quantity	Metric
Ponderosa Lodge	Existing	8,712	Square Feet
	New Construction	3,137	Square Feet
	Net Total	11,849	Square Feet
Silverado House	Existing	8,051	Square Feet
	New Construction	439	Square Feet
	Net Total	8,490	Square Feet
Barn/Equestrian Facility	Existing	4,350	Square Feet
Barn	Existing	2,560	Square Feet
Hacienda House	Existing	2,000	Square Feet
New Lodge	New Construction	16,777	Square Feet
New Admin Building	New Construction	16,777	Square Feet
Chaparral Lodge	Existing	2,160	Square Feet
Kitchen and Dining Room	Existing	2,400	Square Feet
Pool House	Existing	945	Square Feet
Guest Cottage	Existing	838	Square Feet
Ball Court	Existing	27,100	Square Feet
Rock Climbing Wall	Existing	315	Square Feet
Manmade Lake- 1	Existing	4,790	Square Feet
Manmade Lake-2	Existing	20,030	Square Feet
Pool 1	Existing	1,600	Square Feet
Pool 2	Existing	500	Square Feet
Pool 3	Existing	1,300	Square Feet
Private Solar Facilities	New Construction	55,236	Square Feet
Total Existing (Building Area)		32,016	Square Feet
Total New Construction (Building Area)		37,130	Square Feet
Total Future Building Area		69,146	Square Feet
Total Project Site Area		48	Acres

The proposed project is planned to be constructed in two phases:

- Phase 1 will consist of a total of 80 beds;

- Phase 2 consists of an additional 32 beds, bringing the total number of beds to 112.

During its full typical operations, a total of approximately two (2) clients are expected to arrive or leave the site. The Clients which arrive or leave the site to take part in the programs are mainly expected to travel to and from the site through use of shuttles or other means which would eliminate the need for the clients to drive. During the stay, the clients generally remain on site until the program is completed. Hence, the traffic generation associated with the clients are expected to be nominal.

The staff is expected to serve the clients in three work shifts. At its full completion, the proposed project is planned to have the following level of staffing:

Weekday Conditions (Monday through Friday):

- Day Shift (7:00 AM to 3:30 PM): 64 staff persons;
- Swing Shift (3:00 PM to 11:30 PM): 21 staff persons; and
- Night Shift (11:00 PM to 7:30 AM): 8 staff persons.
- Total staff of approximately 93 per 24-hour period.

Weekend Conditions (Saturday & Sunday):

- Day Shift (7:00 AM to 3:30 PM): 32 staff persons;
- Swing Shift (3:00 PM to 11:30 PM): 18 staff persons; and
- Night Shift (11:00 PM to 7:30 AM): 8 staff persons.
- Total staff of approximately 58 per 24-hour period.

The proposed use will also have nominal number trips associated with daily operations such as Fed Ex deliveries, Laboratory, etc.

The existing facility currently has a staff of approximately 4 persons and serves approximately 3,500 visitors per year.

C. Vehicle Miles Traveled (VMT) Evaluation

In addition to the level of service (LOS) analysis for intersections, after July 1, 2020, projects are required to include an analysis of vehicle miles traveled (VMT) per the California Environmental Quality Act (CEQA).

The County of Riverside has updated its traffic study guidelines as contained in the *Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled (County of Riverside Transportation Department, December 2020)* to establish requirements and criteria for evaluating VMT on projects.

Based on these guidelines, some projects are screened out from requiring a VMT analysis and if the appropriate criteria are met, the project VMT impacts are considered less than significant.

Based on review of the screening criteria, the project would be screened out from a VMT analysis based on the following:

- Small Projects.

Based on the *County of Riverside Transportation Department, December 2020*, this applies to projects with low trip generation per existing CEQA exemptions or based on the County Greenhouse Gas Emissions Screening Tables, result in a 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO_{2e}) per year screening level threshold.

If a project results in GHG emissions less than 3,000 Metric Tons of Carbon Dioxide equivalent (MTCO_{2e}) as determined by a methodology acceptable to the Transportation Department, the proposed project is screened out from requiring a VMT analysis and the VMT impacts are considered less than significant.

Based on the detailed greenhouse analysis and air quality evaluation prepared for the proposed project, the proposed project is forecast to result in 802.69 Metric Tons of

Carbon Dioxide Equivalent (MTCO₂e) per year, which is less than the County's threshold of 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO₂e) per year.

A copy of the project Greenhouse Gas analysis section from the project's air quality analysis report is contained in Attachment A.

Hence, based on the Small Projects criteria, the proposed project is considered to have a less than significant VMT impact.

D. Summary & Conclusions

Based on the County of Riverside Transportation Department, December 2020), the proposed project is screened out for VMT analysis and impacts and the project VMT impacts are considered less than significant since it qualifies for the two following parameters:

- Small Projects.

Hence, based on the Small Projects criteria, the proposed project is considered to have a less than significant VMT impact.

RK appreciated the opportunity to serve you on this project and prepare this traffic evaluation. If you have any questions regarding this proposal, please call me at (949) 474-0809.

Respectfully submitted,
RK ENGINEERING GROUP, INC.

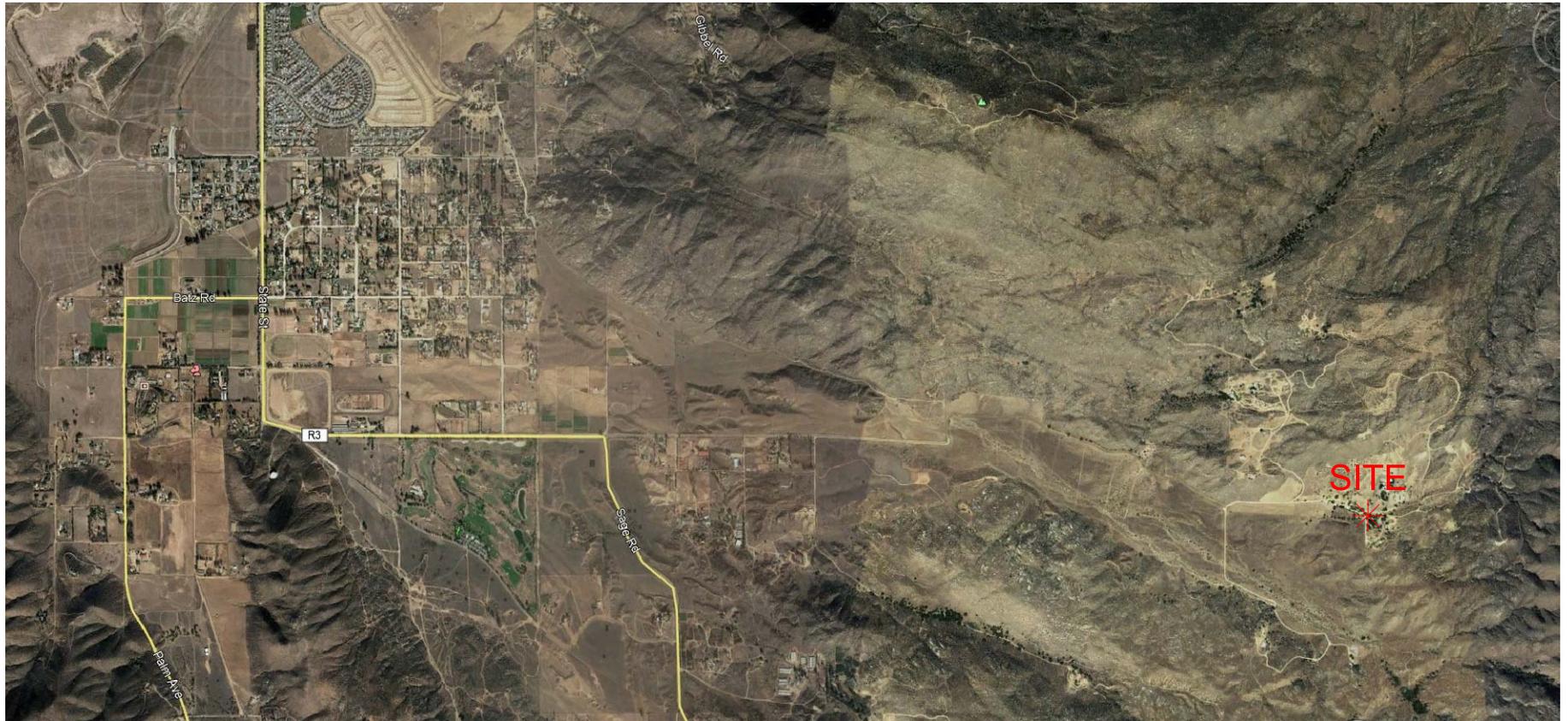


Alex Tabrizi, PE, TE
Principal

Attachments



Exhibit A Location Map



Legend:

 = Project Site



Attachment A

Project Greenhouse Gas Analysis

7.0 Greenhouse Gas Impact Analysis

Consistent with CEQA Guidelines, a significant impact related to greenhouse gas would occur if the proposed project is determined to:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases.

7.1 Greenhouse Gas Emissions - Construction

Greenhouse gas emissions are estimated for on-site and off-site construction activity using CalEEMod. Table 21 shows the construction greenhouse gas emissions, including equipment and worker vehicle emissions for all phases of construction. Construction emissions are amortized over 30 years and added to the long-term operational emissions, pursuant to SCAQMD recommendations.

CalEEMod annual GHG output calculations are provided in Appendix B.

Table 21
Construction Greenhouse Gas Emissions

Activity	Emissions (MTCO ₂ e/yr) ¹		
	On-site	Off-site	Total
Site Preparation	33.71	2.14	35.85
Grading	54.94	2.38	57.32
Building Construction	291.37	2,607.18	2,898.55
Paving	20.19	1.72	21.91
Architectural Coating	2.56	21.69	24.25
Total	402.77	2,635.11	3,037.88
Amortized over 30 years²	13.43	87.84	101.26

¹ MTCO₂e/yr = metric tons of carbon dioxide equivalents per year.

² The emissions are amortized over 30 years and added to the operational emissions, pursuant to SCAQMD recommendations.

7.2 Greenhouse Gas Emissions - Operation

Greenhouse gas emissions are estimated for on-site and off-site operational activity using CalEEMod. Greenhouse gas emissions from mobile sources, area sources and energy sources are shown in Table 22. CalEEMod annual GHG output calculations are provided in Appendix B.

**Table 22
Operational Greenhouse Gas Emissions**

Emission Source	GHG Emissions (MTCO₂e/yr)¹
Mobile Source	533.81
Energy Source	109.13
Area Source	1.78
Water	43.95
Waste	12.76
Construction (30-year amortization)	101.26
Total Annual Emissions	802.69
Riverside County CAP Threshold ²	3,000
Exceed Tier 3 Threshold?	No

¹ MTCO₂e/yr = metric tons of carbon dioxide equivalents per year.

² Per Riverside County Climate Action Plan screening threshold levels for small projects.

As shown in Table 22, the project GHG emissions are expected to be below the County's CAP threshold, which limits GHG emissions to 3,000 MTCO₂e for land use development projects.

The project related long-term GHG impacts are less than significant.

7.3 Riverside County Climate Action Plan

The Riverside County Climate Action Plan (CAP) establishes a threshold of significance of 3,000 MTCO₂e for land use development projects. Projects that exceed the CAP threshold may result in a potentially significant GHG impact and would require the use of Screening Tables to mitigate the project emissions.

The screening tables are setup similar to a checklist, with points allocated to certain elements of the project that would contribute to reduced greenhouse gas emissions. If a project garners 100 points (by including enough GHG reducing elements), then the project is consistent with Riverside County's plan for reducing emissions.

Based on the results of the quantified GHG emissions analysis, the proposed project would not exceed the CAP threshold of significance. Thus, implementation of the screening tables is not required and the project would not be inconsistent with the CAP.

Furthermore, the project will also be required to comply with the mandatory requirements of Title 24 part 11 of the California Building Standards Code (CALGreen) and Title 24 Part 6 Building Efficiency Standards (Energy Code) to further reduce energy usage and GHG emissions. CALGreen and Energy Code compliance are considered part of the project's design features.

By complying with the goals and policies of the CAP, the project will also be in compliant with the broader statewide goals for combating climate change; such as those required in the CARB Scoping Plan and SB 32. The purpose of the County's CAP is to ensure compliance with the state's climate initiatives for reducing GHG emissions.

Therefore, the project will not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of greenhouse gases and the impact is considered less than significant.