

May 31, 2022

Matthew Fagan
MATTHEW FAGAN CONSULTING SERVICES, INC.
42011 Avenida Vista Ladera
Temecula, CA 92591

Subject: StaxUP Storage Expansion Project Trip Generation & Vehicle Miles Traveled (VMT) Study, City of Menifee

Dear Mr. Fagan:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis for the proposed StaxUP Storage Expansion Project.

The purpose of this study is to utilize the *City of Menifee Traffic Impact Analysis Guidelines*, dated January 2019, as well as the *City of Menifee Traffic Impact Analysis Guidelines for Vehicle Miles Traveled*, dated June 3, 2020, prepared by Fehr & Peers, which establishes uniform analysis methodology and thresholds of significance for determining LOS as well as VMT impacts under the California Environmental Quality Act (CEQA), to determine if the project will require a detailed level of service (LOS) analysis and/or a detailed VMT modeling analysis.

Project Description

The project site is located near the southeast corner of Haun Road and Holland Road in the City of Menifee and is currently occupied by the existing StaxUp Storage self-storage facility.

The project proposes the addition of three (3) new self-storage buildings within the existing StaxUp Storage self-storage facility. The project proposes one (1) three-story, 43,125 square foot (SF) building and two (2) one-story, 2,800 SF buildings within the existing development area, resulting in a total new building area of 48,725 SF.

The project proposes 5 parking spaces (1 of which will be ADA compliant) and one unloading area along the east side of the proposed three-story building. The project consists of approximately 8,930 SF of landscaped area inclusive of a water quality basin positioned between the three-story building and the recently approved (yet to be constructed) frontage road as a result of the future Holland Overpass project.

Current access to the project is provided via one (1) full-access unsignalized driveway located along Holland Road. With the expansion of the StaxUp Storage self-storage facility, future project access is proposed via two (2) full-access unsignalized driveways located along the future frontage road (which will be constructed as a result of the future Holland Overpass project).

Exhibit A shows the location map of the proposed project. Exhibit B shows the proposed site plan.

Project Trip Generation

Trip generation represents the amount of traffic that is attracted and produced by a development.

Trip generation is typically estimated based on the trip generation rates from the latest *Institute of Transportation Engineers (ITE) Trip Generation Manual*. The latest and most recent version (11th Edition, 2021) of the ITE Manual has been utilized for this trip generation analysis. This publication provides a comprehensive evaluation of trip generation rates for a variety of land uses.

The project consists of a self-storage facility with a total building area of approximately 48,725 SF. As such, ITE Land Use 151: Mini-Warehouse trip rates are the most appropriate for this land use.

Table 1 shows the ITE trip generation rates (11th Edition) utilized for the trip generation analysis of the proposed project land use.

Table 1
ITE Trip Generation Rates¹

Land Use	Units ²	ITE Code	AM			PM			Daily
			In	Out	Total	In	Out	Total	
Mini-Warehouse	TSF	151	0.05	0.04	0.09	0.07	0.08	0.15	1.45

¹ Source: *ITE Trip Generation Manual* (11th Edition, 2021).

² TSF = Thousand Square Feet

Table 2 shows the trip generation for the proposed project.

Table 2
Project Trip Generation¹

Project Land Use (ITE Code)	Quantity	Units	AM			PM			Daily
			In	Out	Total	In	Out	Total	
StaxUP Storage Expansion (151)	48.725	TSF	3	2	5	3	4	7	71

¹ Source: *ITE Trip Generation Manual* (11th Edition, 2021).

² TSF = Thousand Square Feet

As shown in Table 2, based on the ITE trip generation rates, the proposed project is forecast to generate approximately 71 daily trips with 5 trips in the AM peak hour and 7 trips in the PM peak hour.

As specified in the *City of Menifee Traffic Impact Analysis Guidelines*, dated January 2019, if a project generates less than 50 peak hour trips, a traffic analysis shall not be required, and a trip generation memo will be considered sufficient. Based on the trip generation (i.e., 71 daily trips, 5 AM peak hour trips, and 7 PM peak hour trips), the proposed project is not required to prepare a traffic impact analysis and is not expected to result in any significant adverse impacts on the operations of the roadway network and intersections.

The *City of Menifee Traffic Impact Analysis Guidelines*, dated January 2019, is provided in Appendix A.

VMT Screening Assessment

The California Governor's Office of Planning and Research (OPR) issued a Technical Advisory in December 2018 which described their recommended procedures and methodology for VMT analysis. A key element of SB 743, signed in 2013, is the elimination of automobile delay and LOS as the sole basis of determining California Environmental Quality Act (CEQA) impacts. Pursuant to CEQA guidelines, Section 15064.3, VMT is the most appropriate measure of transportation impacts.

Consistent with the recommendations of the *City of Menifee Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT)*, dated June 3, 2020, prepared by Fehr & Peers, screening thresholds may quickly identify whether or not a project should be expected to have a less than significant impact without conducting a detailed project-level assessment.

The following three types of screening criteria can be applied to effectively screen projects from project-level assessment: Step 1: Transit Priority Area (TPA) Screening; Step 2: Low VMT Area Screening; and Step 3: Project Type Screening. Any of these three criteria can be utilized to screen out a project from project-level VMT assessment. Specifically, Step 3: Project Type Screening criteria is most applicable for this project.

Step 3: Project Type Screening

Local-serving projects, including retail projects less than 50,000 square feet, are presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel.

In addition to local serving retail, the following local serving uses can also be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are local serving in nature:

- Local-serving K-12 schools
- Local parks
- Day care centers
- Local-serving retail uses less than 50,000 square feet

- Gas stations
- Banks
- Restaurants
- Shopping Center
- Local-serving hotels (e.g., non-destination hotels)
- 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
- Affordable or supportive housing
- Assisted living facilities
- Senior housing (as defined by US HUD)
- Project generating less than 110 daily trips
 - This generally corresponds to the following “typical” development potentials:
 - 11 single family housing units
 - 16 multi-family, condominiums, or townhouse housing units
 - 10,000 square feet of office
 - 15,000 square feet of light industrial
 - 63,000 square feet of warehousing
 - 79,000 square feet of high cube transload and short-term storage warehouse

As previously stated, the proposed project will consist of a self-storage facility with a total building area of approximately 48,725 SF and is forecast to generate approximately 71 daily gross trips which is less than the 110 daily trip threshold. As a result, the proposed project is screened out based on Step 3: Project Type Screening and may be presumed to have a less than significant impact on VMT under CEQA. Therefore, no further VMT analysis is required.

The *City of Menifee Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT)*, dated June 3, 2020, prepared by Fehr & Peers, is provided in Appendix B.

Conclusions

RK Engineering Group, Inc. has completed this Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis for the proposed StaxUP Storage Expansion Project.

As specified in the *City of Menifee Traffic Impact Analysis Guidelines*, dated January 2019, if a project generates less than 50 peak hour trips, a traffic analysis shall not be required, and a trip generation memo will be considered sufficient. Based on the trip generation (i.e., 71 daily trips, 5 AM peak hour trips, and 7 PM peak hour trips), the proposed project is not required to prepare a traffic impact analysis and is not expected to result in any significant adverse impacts on the operations of the roadway network and intersections.

Furthermore, consistent with the *City of Menifee Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT)*, dated June 3, 2020, prepared by Fehr & Peers, the proposed self-storage project will consist of an approximately 48,725 square feet of total building area and is forecast to generate approximately 71 daily gross trips. As a result, the proposed project is screened out based on Step 3: Project Type Screening (Project generating less than 110 daily vehicle trips) and may be presumed to have a less than significant impact on VMT under CEQA. Therefore, no further VMT analysis is required.

RK Engineering Group, Inc. appreciates this opportunity to assist with this project. If you have any questions regarding this study, please do not hesitate to contact us at (949) 474-0809.

Sincerely,

RK ENGINEERING GROUP, INC.



Justin Tucker, P.E.
Principal Engineer



Darshan Shivaiah, CEP-IT
Environmental Specialist II

Exhibits



Appendices

Appendix A

City of Menifee TIA Guidelines

City of Menifee

Planning Department



Traffic Impact Analysis Guidelines

Revised:

January 2019



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INTRODUCTION

The City of Menifee requires that the traffic and circulation impacts of proposed development projects, General Plan Amendments (GPA), Specific Plans (SP), and Specific Plan Amendments (SPA) be analyzed. This requirement shall be satisfied through the preparation of a Traffic Impact Analysis (TIA) document prepared in conformance with the requirements outlined in these Traffic Impact Analysis Guidelines.

The Traffic Impact Analysis must be prepared by a Traffic Engineer or a Civil Engineer (Engineer) registered in the State of California, qualified to practice traffic engineering. These Traffic Impact Study Guidelines identify the suggested format and methodology that is generally required to be utilized in the study preparation, subject to amendment without any notification. The purpose of this guide is to establish procedures to ensure consistency of analysis and the adequacy of information presented regarding the proposed development project (Project).

PURPOSE

A TIA report may be required to identify project related impact to the overall transportation system as a part of various types of environmental documentation or as a separate document required by the City in order to assess the transportation related impacts of a proposed project. Unless exempted by the Community Development Department, a TIA report will be required in the following cases:

- **Proposed Development Projects:** Any development which could have a significant impact on the City's transportation network. Examples of possible impacts are increased traffic volumes on arterials, collector or local residential streets, traffic operational issues (i.e. access, visibility etc.), adequate driveway design, etc.
- **General Plan Amendments and Specific Plans:** Will the ultimate circulation system planned for the area be able to provide the required Level of Service (LOS), even with the additional traffic impact of the proposed land use changes? If not, what improvements will be required in order to provide the required LOS?

The scope of the TIA report will be determined through a scoping analysis described in Scoping Section listed on the following page.

EXEMPTIONS

Certain types of projects, because of their size, nature, or location, may be exempt from the requirement of preparing a TIA report. However, the Planning Division and Traffic Engineering Division may require that a focused TIA report be prepared for any project, regardless of size, nature or location, if there are concerns over safety, operational issues, or if located in an area significantly impacted by traffic.



SCOPING

In order to facilitate the TIA preparation and review process, the Applicant/Engineer shall solicit input and approval from the Planning Division and Traffic Engineering Division prior to the preparation and submittal of a draft document. A Scoping Agreement (provided in Attachment A) shall be submitted to the Engineering Department for consideration and approval prior to the preparation of a draft TIA.

The Scoping Agreement shall provide sufficient information for agreement on the following key points before initiating the TIA:

- Project description and location
- Project trip generation, trip distribution, and trip assignment
- Project opening year and horizon year (if required)
- Determination of study area
- Determination of study intersections and/or roadway segments to be analyzed
- Assumption of background traffic growth
- Use of the regional traffic model for horizon year analysis if required
- Solicit input from other agencies if located within a mile radius, and the County of Riverside if within a half-mile radius
- Solicit input from Caltrans if located within a mile radius of a state system

The Community Development and Engineering departments will process the Scoping Agreement and may request a meeting to resolve issues if the approach outlined does not comply with the minimum requirements outlined in the agreement.



METHODOLOGY

Intersection Analysis

The Traffic Engineering Division requires the use of the Transportation Research Board (TRB) Highway Capacity Manual (HCM), 2010, or most recent release for all Traffic Analyses.

- **Signalized intersection Level of Service** shall be analyzed using the Operational Method as described in Chapter 16, Section II.
- **Unsignalized intersections** are to be analyzed using Chapter 17 of the HCM.

It shall be the responsibility of the Applicant/Engineer preparing the study to determine and document what factors, if any, exist, or will exist, as a result of the development, which will decrease performance of the intersection or roadway links (such as existing and proposed signal timing/phasing, etc.).

Roadway Segment Analysis

The roadway segment analysis shall be performed by comparing the Average Daily Traffic (ADT) on a segment with the Roadway Capacity and Level of Service table provided in Attachment B.

Caltrans

Operations of state-owned facilities including ramp junctions and freeway mainline analysis shall be evaluated in accordance with the Caltrans "Guidelines for the Preparation of Traffic Impact Studies", December 2002, or most recent release. Determination of the need for the Caltrans analysis is based on the Trip Generation Thresholds identified in the guidelines documents. Analysis methodologies for state-owned facilities are outlined in the Traffic Impact Analysis Methodologies section of the guidelines document. The Applicant shall coordinate with the Community Development Department, Engineering Department, and/or Caltrans in determining the degree to which the state-owned facilities should be analyzed in the TIA report.

Multimodal Analysis

Existing pedestrian, bicycle and transit service should be clearly documented in the TIA report. Gaps in the existing sidewalk and bicycle network within the study area as well as current access to transit and current transit service should also be clearly identified in the existing conditions analysis.

Analysis of future year conditions shall identify connectivity from the project site to the existing bicycle and pedestrian network and distance to current transit stops. Improvements that will increase connectivity to sidewalks, trails, bicycle facilities and transit facilities shall be considered in the TIA report.

Acceptable Operating Conditions

City of Menifee has identified LOS D as the threshold for acceptable operating conditions for intersections and roadway segments, except at constrained locations in close proximity to I-215, where LOS E is accepted during peak hours. The Traffic Impact Analysis shall address whether or not the required LOS will be achieved after the proposed project is constructed. LOS calculations shall be included with the TIA for all intersections and roadway segments studied. For intersections or roadway segments not meeting the required LOS, the intersection or roadway segment's LOS must be recalculated using the proposed mitigation measures to verify that the required LOS will be achieved.



STUDY AREA

At a minimum, the area to be studied shall generally include streets on which the proposed project will add 50 or more peak hour trips up to a 5-mile radius of the project location. The study area may be extended if the project has a regional impact on the regional transportation system. Additional intersections of concern which include but not limited to project driveways may require analysis. For the projects located in the vicinity of schools, counts may be required during the school season as determined by the Community Development or Engineering Department.

A Roadway Segment analysis shall be required for roadway segments where 500 or more daily trips are added along the City's Circulation Element roadway network up to a 5-mile radius of the project location. Additional intersections and roadway segments may be requested at the discretion of the Traffic Engineer.

STUDY SCENARIOS

The TIA report shall include the following analysis scenarios:

- 1) **Existing Conditions** - Existing traffic will be counted to determine current conditions. This constitutes the environmental setting for a CEQA analysis at the time that the hearing body reviews the project.
- 2) **Existing Plus Project Conditions** – The “existing plus project” conditions scenario is required for all CEQA analyses, in which the impact of project-generated traffic added to the existing traffic volumes and current roadway network is evaluated.
- 3) **Opening Year Cumulative Without Project Conditions** – Traffic conditions at the time the proposed development would be completed, in which the existing traffic counts are increased by an appropriate annual ambient growth rate, projected to the year that the project is estimated to be completed. Opening Year Without Project conditions also includes the additional traffic generated by other approved and/or pending projects in the study area, which is added to the “existing plus ambient growth” traffic volumes. These cumulative projects should be reviewed by City staff prior to initiating the analysis.
- 4) **Opening Year Cumulative With Project Conditions** – Traffic conditions with the completion of the proposed development, with project-related trips added to the Opening Year Without Project traffic volumes.
- 5) **Phased Projects**. Traffic conditions at each project phase completion (if applicable) will be analyzed using the same approach as above for Existing Plus Project and Opening Year Cumulative With Project conditions.
- 6) **Horizon Year Conditions** - Development proposals that include a GPA, SP or SPA, or projects that may exceed the densities identified in the most recent version of the City's General Plan Land Use Element will also be required in addition to the above, to perform a Horizon Year Analysis to assess long-term impacts. This analysis will determine if the Circulation Element of the General Plan is adequate to accommodate traffic growth at the target LOS, or if additional mitigation is necessary.



TRAFFIC VOLUMES

Traffic volumes for each study scenario shall be clearly illustrated in the TIA report. The source and findings of collected data shall also be clearly annotated in the TIA report. Model runs, cumulative project lists and ambient growth calculations shall be provided in the appendix of the TIA. Descriptions of traffic volumes for each study scenario are provided below:

Existing Conditions Traffic Volumes

The TIA report shall use traffic volumes taken from new/recent counts, as approved by the Traffic Engineering Division. The traffic volume counts should not be older than one year. Counts should be conducted on Tuesdays, Wednesdays, or Thursdays during weeks not containing a holiday and conducted in favorable weather conditions. Counts taken near a school must be done while the school is in session. The traffic volume counts are to be included in the study appendices.

***Note:** Traffic count companies must obtain an encroachment permit from the City of Menifee for any counts being done via video.*

Ambient Growth Rate for Opening Year Cumulative Conditions Analysis

The City is currently requiring that existing traffic volumes be increased by an annual ambient growth rate of 2.0%, projected to the year that the proposed development is estimated to be completed.

Cumulative Project Traffic

All projects within the study area which either are pending or have received approvals for development shall be identified and added to the proposed development trip generation. These projects should be reported as cumulative projects in a table format with reference number, name of projects, location, description, ADT, and AM/PM peak hour rates and trips. The Cumulative project information should be obtained from the Planning Division. A map of the currently active citywide development projects is available on the City's website, and is updated periodically.

All approved and pending development projects located within a 3-mile radius of the project site should be identified and included in the analysis. If the project study area extends beyond a 3-mile radius, then all approved and pending projects within a 5-mile radius of the project site should be included. As part of the scoping process, the consultant should provide City staff with the citywide development projects map showing the 3-mile or 5-mile radius from the project site and identifying all cumulative projects within the study radius.

Some of the citywide development project will be phased over multiple years, and so depending on the timing of the proposed Opening Year Cumulative scenario, absorption rates that assume partial buildout of these phased projects should be assumed.

Below are suggested absorption rates for a "typical" opening year scenario that is about 2-3 years into the future:

- ≤ 100 dwelling units (assume 100% complete)
- 101 to 249 dwelling units (assume 50% complete)



- ≥ 250 dwelling units (assume 25% complete)
- Non-residential uses (assume 100% complete)

If the proposed project is a phased development in which project buildout is 5 or more years in the future, the project buildout scenario should assume that most of the cumulative projects have been completed. The consultant should coordinate with City Planning staff to obtain the appropriate absorption rate to use for the largest phased development projects such as Specific Plans.

Background Traffic for Horizon Year Analysis

Model projection from the regional traffic model shall be used as the basis for determining daily roadway segment and peak hour turning-movement volumes to be used in Horizon Year Analysis. A post-processing methodology in National Cooperative Highway Research Program (NCHRP) may be used to calculate AM and PM peak hour turning movement volumes from the calculated average daily traffic (ADT) volumes. This results in Build-out traffic without the project.

A manual assignment of the project traffic added to Horizon Year traffic may typically be used to determine total Horizon traffic with Project. It should be noted that certain large-scale proposals have the potential to create traffic impacts which are significantly greater than the traffic projections used in the regional traffic model. For these projects, the Traffic Engineering Division may request that the Horizon Year analysis utilize more detailed focused model runs in order to determine the realistic Horizon Year traffic. The following are guidelines of projects considered to be significant and subject to the revised modeling requirements:

- 300 dwelling units or greater
- 10 acres of commercial or greater
- 50 acres of industrial or greater
- any project producing 3,000 daily trips or greater



CEQA THRESHOLDS OF SIGNIFICANCE AND COMPLIANCE

The City of Menifee has identified LOS D as the threshold for acceptable operating conditions for intersections except at constrained intersections and roadway segments in close proximity to I-215, where LOS E is accepted during peak hours. The Traffic Impact Analysis report shall address whether or not the required LOS will be achieved after the proposed project is constructed. Intersections or roadway segments not meeting the required LOS may result in a significant impact. The following type of traffic impacts may be considered to be “significant” under CEQA:

1. If the pre-Project condition at an intersection or roadway segment is at or better than the minimum acceptable LOS (LOS D, or LOS E at constrained locations near I-215) and the addition of project trips results in unacceptable LOS (LOS E or LOS F), a significant impact is forecast to occur. This type of impact would be considered a “direct” project impact in which the project would be fully responsible for mitigating the impact.
2. If the pre-Project condition is LOS E or F and the Project adds 50 or more peak hour trips to the intersection or roadway segment, then a significant impact is forecast to occur. This type of impact would be considered a “cumulative” project impact in which the project would be required to contribute a fair share payment toward mitigating the impact.

Fair share contributions may be recommended to mitigate significant impacts under the “Existing Plus Project” scenario if the existing condition is at an unacceptable LOS E or F. All fair share contributions shall be calculated using the following equation:

$$d = \frac{c}{(b - a)}$$

Where:

a = Existing Traffic Volume

b = Opening Year Cumulative With Project Volume

c = Proposed Project Trips

d = Fair Share Percentage

In some cases, a project may require a finding of overriding benefits, which will likely require an Environmental Impact Report (EIR) to be prepared. The need to prepare an EIR shall be determined through consultation with the City Community Development Department.

The City Council at its discretion can approve development projects even in instances where the target LOS is exceeded, if the project has overriding benefits. Examples include projects that provide jobs in a local area, projects that provide needed Traffic improvements that otherwise would not be constructed, projects that provide habitat conservations, projects that implement non-motorized Traffic systems, or projects that provide some unique benefits to the City which outweigh the traffic impacts. These projects are required to mitigate traffic impacts to the extent that it is economically feasible as determined by the Council, based on a value engineering analysis.



It should be noted that in 2014, the State of California passed SB743, which will eliminate level of service (LOS) as a CEQA criteria. At which time the State Office of Planning and Research (OPR) finalize the guidelines for the new Transportation Evaluation metrics and the new CEQA guidelines are approved and accepted, the City will revise these TIA guidelines to describe the appropriate methodology for addressing Transportation related CEQA impacts. However, as a growing City, level of service will continue to play a significant role in assessing the transportation performance and compliance with the General Plan and may be required in TIA's in addition to analysis required by SB743.

PROPOSED MITIGATION MEASURES

Project related impacts shall be clearly identified as direct or cumulative in the TIA report. Only feasible mitigation measures shall be recommended in the TIA report. Consideration should be made for existing right-of-way, availability of receiving lanes for additional thru or turn lanes, environmental constraints, utility conflicts, and economically feasible improvement costs. Analysis of mitigation measures shall be provided to demonstrate the proposed improvement will reduce the project impact to less than significant.

All studies that propose increasing the number of travel lanes on a roadway or intersections as mitigation measures, either beyond existing conditions or for General Plan conditions beyond what is planned for that segment shall clearly identify the impacts associated with such a change. Exhibits and preliminary cost estimates must be provided to show the feasibility of the improvement.

The TIA shall identify whether or not the recommended improvements to achieve LOS standards are within the scope of a funding mechanism. The funding mechanism identified shall also include the availability of the funds and anticipated construction dates (if available). A fair share contribution toward the identified funding mechanism shall be calculated in order to mitigate identified cumulative project impacts.

Mitigation measures may also include connectivity improvements for bicycles and pedestrians. Improvements along the project frontage shall include pedestrian and bicycle facilities in compliance with the goals and policies established in the City's General Plan and mandated through the Complete Streets Act of 2008. The project should clearly identify pedestrian and bicycle facilities within the community that connect the development to existing sidewalk and bicycle facilities.

Mitigation measures that are determined to be infeasible should be discussed in the TIA and the factors resulting in the mitigation being infeasible should be identified.



ADDITIONAL ANALYSIS

Additional analysis may be required based on the size, scope, location and access conditions of the project. Additional analysis requirements shall be determined based on the conditions listed below and shall be included in the TIA report:

Traffic Signal Warrant Analysis

The Engineer shall review unsignalized intersections within the study area including the project access points, to determine if signal warrants are met for any of the study year scenarios (existing, existing plus project, cumulative with and without project, etc.) The signal warrant analysis shall utilize the Peak-hour warrants from the most recent edition of California Manual on Uniform Traffic Control Devices (CA-MUTCD). The warrant analysis shall be included in the study appendices.

For traffic signals that are found to be warranted within or bordering a SP, the TIA shall identify signals which are the responsibility of development, and also those covered under the Development Impact Fee Program (DIF Program).

On-site Circulation

Include a brief discussion on internal circulation and proposed on-site parking. Show and discuss how vehicles would enter and exit via the main access driveways and identify any potential on-site or off-site circulation problems. This shall include Truck Turning paths for any proposed truck movements.

Safety and Operational Improvements

The TIA shall examine existing roadway conditions to determine if safety and operational improvements are necessary due to an increase in traffic from the project or cumulative projects. The City may request Synchro Simtraffic models to verify operational analyses. The types of improvements to be identified may include, but are not limited to:

- Traffic Signal Improvements
- Additional thru and/or turning (right/left) lanes
- Signing and Striping
- Bus Turnouts
- Stopping/Corner sight distance studies
- Parking restrictions
- Measures to reduce cut-through project traffic in adjacent residential areas
- Potential impacts to adjacent schools
- Right turn overlaps
- Signal Coordination
- Protected/Permissive Phasing Improvements
- Queue lengths/turn pocket length and impacts to adjacent intersections



GENERAL PLAN CONFORMANCES (GPA/SP/SPA)

The TIA report shall identify if the roadway system proposed in the Circulation Element of the current General Plan is adequate to accommodate traffic from the project, or if changes to the General Plan are proposed as part of the project approval. If a project is proposing a change in the General Plan Circulation Element, the General Plan Amendment must be approved before the project approval.

SPECIAL USES

For projects involving special uses, additional analysis may be required as discussed in this section. Additional special conditions or uses may be identified during the project scoping process that may also require additional analysis, not described below, but may be requested at the discretion of the Planning or Traffic Engineering Division.

Truck Intensive Uses

In addition to the standard TIA requirements, projects which are “truck intensive” (distribution centers, warehousing, etc.) may be required to submit a study addressing the truck access routes, adequacy of the existing streets to be used (in terms of geometry and structural section), safety issues relating to the truck traffic, and the impacts of the truck traffic on existing residences or businesses.

All trips generated by the project shall be based on ITE’s *Trip Generation Manual, 9th Edition* (or latest edition) any other method of calculating trip generation or vehicle mix shall have prior approval from the Traffic Engineering Division. The vehicle mix shall be determined based upon vehicle mix percentages provided in the August 2003 City of Fontana *Truck Trip Generation Study* (or latest version). The PCE factors will be provided by the Traffic Engineering Division and all methodologies shall be approved during the scoping process prior to starting the study. A separate exhibit containing Truck Trip Distribution shall also be prepared.

Special Event Uses

Special event land uses which do not exhibit typical trip generation characteristics may require unique analysis, including midday, weekend and other off-peak scenarios. Examples of such uses would be sports stadiums, racetracks or uses which exhibit substantial traffic peaking associated with special events that are scheduled on a periodic basis.

The traffic analysis for such uses shall include a traffic management plan to control traffic impacts associated with the special events. Adequate circulation shall be provided to the site and all impacts shall be alleviated to the maximum extent possible.



FORMAT

The TIA will generally include the following major components:

- Level of Service analysis
- Proposed mitigation measures
- Traffic signal warrant analysis
- On-site circulation analysis
- Funding mechanism identification

In addition to the above, General Plan Amendments, Specific Plans and Specific Plan Amendments, shall include the following:

- Specific Plan signalization analysis
- General Plan conformance review

Projects that involve special uses, such as truck-intensive projects or special events, may also be required to perform additional analysis to determine project impacts.

SUBMITTAL REQUIREMENTS AND PROCEDURE

Scoping Agreement

Submit one (1) scoping agreement with associated attachments including site plan, trip generation tables, trip distribution and assignment exhibits and suggested study area map. Projects impacting other jurisdictional agencies such as Caltrans, will require review and approval of that jurisdictional agency for scoping agreements and TIAs.

Initial Submittal

Submit two (2) copies and one (1) electronic data (PDF format) on a CD of the Traffic Impact Study to the Community Development Department.

Resubmittal(s)

If revisions to the Traffic Impact Study are necessary, re-submit two (2) copies and one (1) electronic version (PDF format), plus the red lined original study and City comment letter containing the Department's comments.

Final Approval

Upon approval submit two (2) Final copies and one (1) electronic data copy (PDF) format on a CD of the approved Traffic Impact Study to the Planning Division.

All submittals, including the initial, revised and final TIA report shall be signed by a Traffic Engineer or Civil Engineer registered in the State of California and qualified to prepared traffic impact analysis reports. Submittals that do not adhere to the above listed requirements may be rejected and returned to the applicant for resubmittal.



CITY OF MENIFEE ENGINEERING DEPARTMENT

<i>FOR USE BY STAFF</i>
Permit#: _____
Received Date: _____

TRAFFIC SCOPING/STUDY

APPLICATION

SUBMITTAL REQUIREMENTS

THIS FORM MUST BE SUBMITTED WITH FIRST PLAN CHECK:

Project No: _____ Schedule: _____ (if applicable)

Project Description: _____

Name of Owner: _____

Signature: _____ Phone #: _____

Mailing Address: _____ FAX number: _____

_____ Email Address: _____

Name of Applicant: _____ Contact: _____

Authorized Signature: _____ Phone #: _____

Mailing Address: _____ FAX number: _____

_____ Email Address: _____

Submittal Requirements

- | | | | |
|----|-------|--------|-----------------------|
| 1. | _____ | 2 Sets | Site Plan |
| 2. | _____ | 2 Sets | Traffic/Scoping Study |
| 3. | _____ | 1 | \$1,000.00 – Deposit |

FIRST SUBMITTAL REQUIRMENTS

- A. The City reserves the right to reject the submitted plan package without performing any plan checks if any of the required plans or information items are missing.

I, the undersigned engineer, do verify that all the items necessary for this project and checked above are attached.

Signature

Date

Civil Engineer's Stamp

Printed Name

Firm Name

Address

Phone Number

Fax

Email Address

1/21/2014

ATTACHMENT A

SCOPING AGREEMENT FOR TRAFFIC IMPACT ANALYSIS

This letter acknowledges the City Menifee Engineering Department requirements for the traffic impact analysis of the following project. The analysis must follow the latest City Traffic Impact Analysis Guidelines dated January 2019.

Case No. _____
 Related Cases -
 SP No. _____
 EIR No. _____
 GPA No. _____
 CZ No. _____
 Project Name: _____
 Project Location: _____
 Project Description: _____

	<u>Consultant</u>	<u>Developer</u>
Name: _____	_____	_____
Address: _____	_____	_____
Telephone: _____	_____	_____

A. Trip Generation Source: ITE Trip Generation Manual, most recent edition

Existing Land Use _____	Proposed Land Use _____
Existing Zoning _____	Proposed Zoning _____
Total Daily Trips _____	

	In	Out	Total
AM Trips	-	_____	_____
PM Trips	-	_____	_____

Internal Trip Allowance Yes No (_____ % Trip Discount)
 Pass-By Trip Allowance Yes No (_____ % Trip Discount)

(Attach additional sheet if this is a multi-use site with a breakdown of trips generated)

B. Trip Geographic Distribution: N % S % E % W %
 (See attached exhibit for detailed assignment)

C. Background Traffic

Project Completion Year: _____ Annual Ambient Growth Rate: %
 Other area projects to be included: _____

Please contact the Engineering Department or use the most recently provided data

Model/Forecast methodology if required _____

D. Horizon Year Analysis: Does this project require a Horizon Year Analysis?

Yes No

E. Study intersections: (NOTE: Subject to revision after other projects, trip generation and distribution are determined, or comments from other agencies.)

- | | |
|------|----------|
| 1. - | 5. - |
| 2. - | 6. - |
| 3. - | 7. - |
| 4. - | 8. _____ |

F. Study Roadway Segments:

- | | |
|------|----------|
| 1. - | 5. - |
| 2. - | 6. - |
| 3. - | 7. - |
| 4. - | 8. _____ |

G. Other Jurisdictional Impacts

Is this project within any other Agency's Sphere of Influence or one-mile radius of boundaries? Yes No

If so, name of Jurisdiction: _____

H. Site Plan (please attach a legible 11'X17' copy)

I. Specific issues to be addressed in the Study (in addition to the standard analysis described in the Guideline) (To be filled out by Engineering Department)

Recommended by:

Consultant's Representative

Date

Scoping Agreement Submitted on

Date

Scoping Agreement Resubmitted on

Date

Approved Scoping Agreement:

City of Menifee
Engineering Department

Date

**ATTACHMENT B:
ROADWAY SEGMENT CAPACITY THRESHOLDS**

Roadway Classification	Number of Lanes	Maximum Two-Way Average Daily Traffic (ADT) Volume		
		LOS C	LOS D	LOS E
Collector	2	10,400	11,700	13,000
Secondary	4	20,700	23,300	25,900
Major	4	27,300	30,700	34,100
Arterial	4	29,600	33,400	37,000
Mountain Arterial	2	12,900	14,500	16,100
Mountain Arterial	4	25,500	28,700	31,900
Urban Arterial	6	45,000	50,600	56,300
Urban Arterial	8	69,000	78,000	87,000
Expressway	4	53,000	58,000	64,000
Expressway	6	79,000	87,000	95,000
Expressway	8	106,000	119,000	132,000
Freeway	4	80,000	91,000	100,000
Freeway	6	102,000	123,000	132,000
Freeway	8	136,000	164,000	176,000
Freeway	10	169,000	205,000	220,000
Ramp ⁽¹⁾	1	16,000	18,000	20,000

Footnotes:

1. Ramp Capacity is given as a one-way traffic volume.

Source: Riverside County Transportation Department

Appendix B

City of Menifee VMT Guidelines



City of Meniffee Traffic Impact Analysis Guidelines for Vehicle Miles Traveled

Prepared by:

FEHR  PEERS

For the:

City of Meniffee

Adopted June 3, 2020

Resolution No. 20-920

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Introduction

Background

Senate Bill 743 (SB 743), signed by the Governor in 2013, is changing the way transportation impacts are identified. Specifically, the legislation has directed the Office of Planning and Research (OPR) to look at different metrics for identifying transportation as a California Environmental Quality Act (CEQA) impact. The Final OPR guidelines were released in December 2018 and identified vehicle miles of travel (VMT) as the preferred metric moving forward. The Natural Resources Agency completed the rule making process to modify the CEQA guidelines in December of 2018.

In anticipation of the change to VMT, the Western Riverside Council of Governments (WRCOG) completed a SB 743 Implementation Pathway Study in 2019 to assist their member organizations with answering important implementation questions about the methodology, thresholds, and mitigation approaches for VMT impact analysis. The City of Menifee is one of several WRCOG member organizations. The WRCOG study can be accessed on-line (<http://www.fehrandpeers.com/wrcog-sb743/>) and includes the following main components.

- Thresholds Evaluation Memorandum – Potential thresholds WRCOG agencies could consider when establishing thresholds of significance for VMT assessment
- Methodologies and Calculations Memorandum – Types of VMT that could be considered for impact assessment
- Tools Evaluation Memorandum – Types of tools that could be used to estimate VMT and the pros/cons associated with each tool
- Mitigation Memorandum – Types of mitigation that can be considered for VMT mitigation
- VMT Screening Tool – An on-line GIS tool that can be used for VMT screening

All WRCOG agencies can utilize the information produced through the Implementation Pathway Study to adopt their own methodology and significance thresholds for use in CEQA compliance. CEQA Guidelines Section 15064.7(b) encourages local agencies to adopt their own significance thresholds, which is key part of the SB 743 implementation process.

The City of Menifee built on the work WRCOG started in order to determine appropriate thresholds of significance, analysis methodologies, and mitigation strategies. The City of Menifee's SB 743 Implementation Study applied the latest information available in the context specific for the City of Menifee. The study included the following components:

- Thresholds Assessment Memorandum – Updated documentation of available thresholds of significance for VMT assessment;
- VMT Impact Analysis Methodologies Memorandum – Updated documentation on potential project screening and analysis methodology for land use projects, land use plans, and transportation projects;
- VMT Impact Analysis Case Studies Memorandum – Applications of available thresholds and methodologies on real Menifee projects to provide context to decision makers; and

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- Mitigation and TDM Strategy Assessment Memorandum – Updated discussion of available mitigation and TDM strategies specific to the City of Menifee, including potential VMT exchanges and banks

CEQA Changes

A key element of SB 743 is the elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. The intent of this change is to assist in balancing the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

Is Level of Service (LOS) Still Important?

The City of Menifee has adopted vehicle Level Of Service (LOS) policies that set standards for which City infrastructure will strive to maintain. These policies are contained in the City's General Plan and therefore apply to discretionary approvals of new land use and transportation projects. For LOS traffic study requirements, refer to the City's latest adopted LOS Traffic Study Guidelines.

Note to TIA Preparers

Changes to requirements for traffic analysis under CEQA are anticipated as CEQA law changes, the State CEQA Guidelines are updated and/or legal opinions on traffic analysis under CEQA are published. As such, The City of Menifee will periodically review these Guidelines for applicability. Consultants should contact the City to ensure that they are applying the most recent guidelines for project impact assessment.

The purpose of these TIA Guidelines is to provide general instructions for analyzing the potential transportation impacts of proposed development projects and land use changes (e.g., general plan amendments and changes of zone). These Guidelines present the recommended format and methodology that should generally be utilized in the preparation of TIAs. These Guidelines utilize latest practices and comply with CEQA requirements prompted by Senate Bill 743 (SB 743). These recommendations are general guidelines and the City of Menifee has the discretion to modify the TIA requirements based on the unique characteristics of a particular project.

To avoid unnecessary delays or revisions and to streamline the TIA preparation and review process, the City requires applicants to submit a Project Scoping Form to the City for approval prior to the preparation and submittal of a draft TIA. The Project Scoping Form (Attachment A of these Guidelines) includes the process for VMT assessment.

These TIA Guidelines for assessing VMT under CEQA comply with OPR's CEQA Guidelines and build on WRCOG's Implementation Pathway Study and the City of Menifee's SB 743 Implementation Study.

Need for Transportation Impact Analysis

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The need for a TIA related to VMT will stem from CEQA compliance. Discretionary actions of public agencies all trigger CEQA review, but whether a TIA is required depends on the findings of the City of Menifee initial study and the potential for the project to cause a significant impact.

Need to Complete VMT as part of the TIA Analysis

The following activities generally will not require a TIA that includes VMT. This presumption is based on the substantial evidence provided in the OPR Technical Advisory supporting SB 743 implementation or is related to projects that are local-serving which, by definition, would decrease the number of trips or the distance those trips travel to access the development (and are VMT-reducing projects). Applicants should consult with the City’s Traffic Engineering Department if a project does not fall within the land uses listed but is anticipated to decrease VMT.

- Projects located in a Transit Priority Areas (TPA) (as defined later in this guidance)
- Projects located in a low-VMT generating area (as defined later in this guidance)
- K-12 schools
- Local parks
- Day care centers
- Local-serving retail uses less than 50,000 square feet, including:
 - Gas stations
 - Banks
 - Restaurants
 - Shopping Center
- Local-serving hotels (e.g. non-destination hotels)
- 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 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- Affordable or supportive housing
- Assisted living facilities
- Senior housing (as defined by the U.S. Department of Housing and Urban Development (HUD))
- Projects generating less than 110 daily vehicle trips

Coordination with the City of Menifee

To streamline the TIA preparation and review process, the TIA preparer shall solicit input and approval from the City prior to the preparation and submittal of a draft TIA document. A TIA “Project

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Scoping Form”, attached, shall be prepared by the Engineer and submitted to the City for approval prior to the preparation of a draft TIA. The Project Scoping Form provides for agreement of the following key points before initiating the TIA.

- Project trip generation
- Presentation of screening criteria used to screen the project from VMT assessment or proposed methodology/metrics that will be applied to estimate VMT
- Use of other approved projects for background traffic, traffic growth assumptions, or integration with RIVTAM or RIVCOM¹ travel demand model
- Coordination with adjacent agencies
- For projects within one mile of a state highway, or any project that may add traffic on the state highway, the Engineer shall also coordinate with Caltrans

¹ Note – RIVCOM is currently under development with an anticipated completion date in the Spring/Summer of 2020. Once finalized, RIVCOM should be utilized for all forecasting activity. Please coordinate with WRCOG to ensure that the prepare utilizes the most recent travel demand forecasting model.

CEQA Assessment - VMT Analysis

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A key element of SB 743, signed in 2013, is the elimination of automobile delay and LOS as the sole basis of determining CEQA impacts. The most recent CEQA guidelines, released in December 2018, recommend VMT as the most appropriate measure of project transportation impacts. However, SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., the general plan), studies, or ongoing network monitoring.

The following recommendations assist in determining VMT impact thresholds and mitigation requirements for various land use projects' TIAs.

Analysis Methodology

For purposes of SB 743 compliance, a VMT analysis should be conducted for land use projects as deemed necessary by the Traffic 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 WRCOG region or the lead agency threshold. Normalizing VMT per service population provides a transportation efficiency metric for the analysis. Using this efficiency metric allows the user to compare the project to the remainder of an established geographic area (city, county, or region) for purposes of identifying transportation impacts.

Project Screening

Below, are three options for screening projects from project-level assessment:

Step 1: Transit Priority Area (TPA) Screening

Projects located within a TPA² may be presumed to have a less than significant impact absent substantial evidence to the contrary. This presumption may **NOT** be appropriate if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75;
2. 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);
3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City of Menifee, with input from the Metropolitan Planning Organization); or

² A TPA is defined as a half mile area around an existing major transit stop or an existing stop along a high quality transit corridor per the definitions below. As of July 1, 2020, no Transit Priority Areas exist in the City of Menifee.

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.

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.

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4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Step 2: Low VMT Area Screening

Residential and office projects located within a low VMT-generating area are 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 there is a reasonable expectation that the project will generate VMT per service population that is similar to the existing land uses in the low VMT area.

For this screening in the City of Meniffee, the RIVTAM travel forecasting model was used to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs). TAZs are geographic polygons similar to Census block groups used to represent areas of homogenous travel behavior. Total daily VMT per service population (population plus employment) was estimated for each TAZ. This presumption may not be appropriate if the project land uses would alter the existing built environment in such a way as to increase the rate or length of vehicle trips.

To identify if the project is in a low VMT-generating area, the analyst may review the WRCOG screening tool and apply the appropriate threshold (identified later in this chapter) within the tool. Additionally, as noted above, the analyst must identify if the project is consistent with the existing General Plan land use within that TAZ and use professional judgement that there is nothing unique about the project that would otherwise be misrepresented utilizing the data from the travel demand model.

The WRCOG screening tool can be accessed at the following location:

<http://gis.fehrandpeers.com/WRCOGVMT/>

Step 3: Project Type Screening

Local-serving projects, including retail projects less than 50,000 square feet, are presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel.

In addition to local serving retail, the following uses can also be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are local serving in nature:

- Local-serving K-12 schools
- Local parks
- Day care centers
- Local-serving retail uses less than 50,000 square feet, including:
 - Gas stations

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- Banks
- Restaurants
- Shopping Center
- Local-serving hotels (e.g. non-destination hotels)
- 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
- Affordable or supportive housing
- Assisted living facilities
- Senior housing as defined by the U.S. Department of Housing and Urban Development (HUD)
- Projects generating less than 110 daily vehicle trips³
 - This generally corresponds to the following “typical” development potentials:
 - 11 single family housing units
 - 16 multi-family, condominiums, or townhouse housing units
 - 10,000 sq. ft. of office
 - 15,000 sq. ft. of light industrial⁴
 - 63,000 sq. ft. of warehousing⁴
 - 79,000 sq. ft. of high cube transload and short-term storage warehouse⁴

VMT Assessment for Non-Screened Development

Projects not screened through the steps above should complete VMT analysis and forecasting through the RIVCOM model (once complete) or RIVTAM model to determine if they have a significant VMT impact. This analysis should include ‘project generated VMT’ and ‘project effect on

³ This threshold ties directly to the OPR technical advisory and notes that CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

⁴ Threshold may be higher depending on the tenant and the use of the site. This number was estimated using rates from ITE’s Trip Generation Manual.

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VMT' estimates for the project transportation analysis zone (TAZ or TAZs) under the following scenarios:

- Baseline conditions - This data is already available in the web screening map.
- Baseline plus project for the project - The project land use would be added to the project TAZ or a separate TAZ would be created to contain the project land uses. A full base year model run would be performed and VMT changes would be isolated for the project TAZ and across the full model network. The model output must include reasonableness checks of the production and attraction balancing to ensure the project effect is accurately captured. If this scenario results in a less-than-significant impact, then additional cumulative scenario analysis may not be required (more information about this outcome can be found in the Thresholds Evaluation discussion later in this chapter).
- Cumulative no project - This data is available from WRCOG.
- Cumulative plus project - The project land use would either be added to the project TAZ or a separate TAZ would be created to contain the project land uses. The addition of project land uses should be accompanied by a reallocation of a similar amount of land use from other TAZs; especially if the proposed project is significant in size such that it would change other future developments. Land use projects will generally not change the cumulative no project control totals for population and employment growth. Instead, they will influence the land use supply through changes in general plan land use designations and zoning. If project land uses are simply added to the cumulative no project scenario, then the analysis should reflect this limitation in the methodology and acknowledge that the analysis may overestimate the project's effect on VMT.

The model output should include total VMT, which includes all vehicle trips and trip purposes, and VMT per service population (population plus employment). Total VMT (by speed bin) is needed as an input for air quality, greenhouse gas (GHG), and energy impact analysis while total VMT per service population is recommended for transportation impact analysis in City of Menifee.

Both "plus project" scenarios noted above will summarize two types of VMT: (1) project generated VMT per service population and comparing it back to the appropriate benchmark noted in the thresholds of significance, and (2) the project effect on VMT, comparing how the project changes VMT on the network looking at Citywide VMT per service population and comparing it to the no project condition.

Project-generated VMT shall be extracted from the travel demand forecasting model using the origin-destination trip matrix and shall multiply that matrix by the final assignment skims. The project-effect on VMT shall be estimated using a City of Menifee boundary and extracting the total link-level VMT for both the no project and with project condition.

A detailed description of this process is attached to these guidelines as Attachment B.

CEQA VMT Impact Thresholds

The City of Meniffee selected VMT thresholds of significance based on guidance/substantial evidence prepared in the WRCOG and City of Meniffee Implementation Studies.

VMT Impacts

A project would result in a significant project-generated VMT impact if either of the following conditions are satisfied:

1. The baseline project-generated VMT per service population exceeds the County of Riverside General Plan Buildout VMT per service population, or
2. The cumulative project-generated VMT per service population exceeds the County of Riverside General Plan Buildout VMT per service population

Utilizing the Origin Destination OD/VMT per service population methodology for County General Plan Buildout and utilizing RIVTAM (March 2020), the County VMT/service population threshold is 35.68.

The project's effect on VMT would be considered significant if it resulted in either of the following conditions to be satisfied:

1. The baseline link-level Citywide boundary VMT per service population to increase under the plus project condition compared to the no project condition, or
2. The cumulative link-level Citywide boundary VMT per service population to increase under the plus project condition compared to the no project condition.

Please note that the cumulative no project shall reflect the adopted Regional Transportation Plan/Sustainable Communities Strategy; as such, if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence

VMT Mitigation Measures

To mitigate VMT impacts, the following choices are available to the applicant:

1. Modify the project's built environment characteristics to reduce VMT generated by the project
2. Implement transportation Demand Management (TDM) measures to reduce VMT generated by the project.
3. Participate in a VMT fee program and/or VMT mitigation exchange/banking program (if they are available) to reduce VMT from the project or other land uses to achieve acceptable levels

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As part of the WRCOG Implementation Pathway Study and Meniffee’s SB 743 Implementation Project, key TDM measures that are appropriate to the region were identified and can be accessed as Attachment of these Guidelines. Measures appropriate for Meniffee are summarized in Attachment B of the City of Meniffee SB 743 Implementation Mitigation and TDM Strategy Assessment Memorandum. Evaluation of VMT reductions should be evaluated using state-of-the-practice methodologies recognizing that many of the TDM strategies are dependent on building tenant performance over time. As such, actual VMT reduction cannot be reliably predicted and monitoring may be necessary to gauge performance related to mitigation expectations.

CEQA Assessment - Active Transportation and Public Transit Analysis

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Potential impacts to public transit, pedestrian facilities and travel, and bicycle facilities and travel can be evaluated using the following criteria.

- A significant impact occurs if the project conflicts with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreases the performance or safety of such facilities.

Therefore, the TIA should include analysis of a project to examine if it is inconsistent with adopted policies, plans, or programs regarding active transportation or public transit facilities, or otherwise decreases the performance or safety of such facilities and make a determination as to whether it has the potential to conflict with existing or proposed facilities supporting these travel modes.

Transportation Impact Study Format

Prior to the beginning of any study, the project proponent shall coordinate with City Planning and Traffic Engineering staff. A tentative schedule for reviewing and processing the TIA will be developed by the City. Initial discussions shall also identify any key issues along with the development scope and boundaries of the study area. The proponent will submit a detailed site plan at this meeting. City staff will provide input into the following specific areas of the analysis:

- Defining the general study area boundaries
- Project access
- Approved development in the vicinity of the project for cumulative analysis
- Appropriate Trip Generation rates for the project

The project proponent shall coordinate and discuss the details and technical aspects of the analysis with Traffic Engineering staff prior to a formal submittal. Topics of discussion will include:

- Potential for project level VMT screening
- VMT Analysis assumptions
- Inclusion of a Transportation Demand Management Plan (TDM) to mitigate traffic impacts and promote the use of alternate modes of transportation
- Any specific issues that require special consideration such as pedestrian circulation, access, parking and on-site circulation

The content and level of analysis necessary to evaluate a project will vary and are dependent on the scope of the development proposal and location within the City.

VMT Assessment Requirements

Present the Project VMT per service population (population and employment) for all analysis scenarios and the Project effect on VMT for all analysis scenarios. Data should be presented in tabular format. If the project meets the criteria for screening from project-generated VMT analysis,



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this should be documented. All VMT impacts should be identified in accordance with the VMT Impact Thresholds described above. Proposed VMT mitigation measures should be identified.

Attachments

Attachment A: Project Scoping Form

This scoping form shall be completed and submitted to the City of Meniffee to assist in identifying infrastructure improvements that may be required to support traffic from the proposed project.

Project Identification:

Case Number:	
Related Cases:	
SP No.	
EIR No.	
GPA No.	
CZ No.	
Project Name:	
Project Address:	
Project Opening Year:	
Project Description:	

	Consultant:	Developer:
Name:		
Address:		
Telephone:		
Fax/Email:		

Trip Generation Information:

Trip Generation Data Source: _____

Current General Plan Land Use:

Proposed General Plan Land Use:

Current Zoning:

Proposed Zoning:

	Existing Trip Generation			Proposed Trip Generation		
	In	Out	Total	In	Out	Total
AM Trips						
PM Trips						

Trip Internalization: Yes No (_____ % Trip Discount)
 Pass-By Allowance: Yes No (_____ % Trip Discount)

Potential Screening Checks

Is your project screened from specific analyses (see Page 11 of the guidelines related to LOS assessment and Pages 24-26).

Is the project screened from VMT assessment? Yes No

VMT screening justification (see Pages 24-26 of the guidelines): _____

VMT Analysis Scoping

For projects that are not screened, identify the following:

- Travel Demand Forecasting Model Used _____
- Attach WRCOG Screening VMT Assessment output or describe why it is not appropriate for use
- Attach proposed Model Land Use Inputs and Assumed Conversion Factors (attach)

Signatures

TIA Preparer: _____ City (Approved by): _____

Attachment B: Detailed VMT Forecasting Information

RIVTAM and RIVCOM are trip-based models that generate daily person trip-ends for each TAZ across various trip purposes (Home-Based Work (HBW), Home-Based Other (HBO), and Non-Home Based (NHB) based on population, household, and employment variables. Production and attraction trip-ends are separately calculated for each zone, and, generally, production trip-ends are generated by residential land uses and attraction trip-ends are generated by non-residential land uses. During the final assignment loop of a model run, the total trips between each TAZ are converted to the origin-destination trip matrix, which are used to estimate total VMT. A challenge using this approach to estimating VMT is production and attraction trip-ends are not distinguishable after the PA to OD conversion process and trip purposes are not maintained after the mode choice step.

Origin-Destination VMT Forecasting Instructions

This approach will calculate total Origin/Destination (OD) VMT using standard RIVTAM or RIVCOM model output files. The OD method for calculating total VMT includes all vehicle trips that start in a specific traffic analysis zone, and all vehicle trips that end in a specific traffic analysis zone. The major steps of this approach are listed as follows:

- Re-skim final loaded congested networks and adjust the external skim for each mode and time period to account for truncated trips
- Multiply appropriate distance skim matrices by OD trip matrices to estimate VMT by time period
- Sum matrices by time period and mode to calculate daily automobile VMT
- Calculate automobile VMT for individual TAZs

Appropriateness Checks

The number of vehicle trips from the total VMT estimation should match as closely as possible with the results from the traditional model process. The estimated results should be checked against the results from a full model run to understand the degree of accuracy. Note that these processes should include IX/XI trips (trips with origins or destinations outside of the model roadway network), truck trips, or special generator trips (airport, seaport, stadium, etc.).

When calculating VMT for comparison at the study area, citywide, or regional geography, the same methodology that was used to estimate project-specific VMT should be used. The VMT for these comparisons can be easily calculated by aggregating the row or column totals for all zones that are within the desired geography.



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Attachment C: City of Menifee SB 743 Implementation Mitigation and TDM Strategy Assessment Memorandum

TECHNICAL MEMORANDUM

Date: March 31, 2020

To: Doug Darnell, AICP, City of Menifee
Cheryl Kitzerow, AICP, City of Menifee

From: Jason D. Pack, PE
Paul Herrmann, PE

Subject: Draft City of Menifee SB 743 Implementation Mitigation and TDM Strategy Assessment

OC20-0712

This technical memorandum summarizes our assessment of new research related to transportation demand management (TDM) effectiveness for reducing vehicle miles of travel (VMT). The purpose of this work was to understand what options are available to mitigate VMT, to compile new TDM information that has been published in research papers since release of the *Quantifying Greenhouse Gas Mitigation Measures*, California Air Pollution Control Officers Association (CAPCOA), August 2010 and to identify those strategies suited to the City of Menifee given the varying land use context. The land use and transportation context for Menifee presents a challenge to the effectiveness of common TDM strategies for VMT reduction when applied at individual project sites due to limited access to transit and non-motorized modes. The matrix in Attachment A summarizes the overall evaluation of all the CAPCOA strategies while the matrix in Attachment B identifies the top seven strategies suited for the City of Menifee study area.

Mitigation Programs

The approach to the overall assessment includes two parts. The first part is an evaluation of how VMT reduction strategies or projects could be developed or incorporated into existing funding programs such as Transportation Impact Fee (TIF) program. The purpose of incorporating VMT reduction strategies directly into existing programs is to provide greater certainty and effectiveness for VMT impact mitigation. The second part of the assessment identifies potential new mitigation program concepts that may be worthy of further evaluation.

Existing Programs

The City of Menifee maintains Transportation Impact and Improvement Fees. This program collects a fair-share fee payment from new development to contribute to the cost of a Capital Improvement Program (CIP) consisting of long-term transportation network expansion projects identified to accommodate

Doug Darnell
Cheryl Kitzerow
City of Menifee
March 31, 2020

planned population and employment growth. The program focuses on vehicle trips or vehicle LOS as the key metric for determining deficiencies and developing CIP projects.

In its current form, the impact fee would not qualify as VMT impact mitigation program. In fact, if the City's CIP includes roadway capacity expansion that contributes to increases in VMT. Expanding roadway capacity in congested areas induces new vehicle travel that diminishes congestion relief benefits and generates new VMT and emissions. Refer to the following websites for more research information and technical details:

- http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf
- https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf
- <https://trrjournalonline.trb.org/doi/abs/10.3141/2653-02>

If the City's CIP also includes operational improvements, such as signal coordination projects, they would not contribute to an increase in VMT. The City's CIP also includes some transit, bicycle, and pedestrian projects that could contribute to VMT reduction.

If the transit, bicycle, and pedestrian projects were separated into a stand-alone CIP with a supporting nexus study based on VMT reduction, then a new VMT fee program could be developed that is dedicated to VMT impact mitigation. This could be a new program implemented by Menifee. An example of this type of program has been developed in the City of Los Angeles as part of their Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan. Details are provided at the following website:

<http://www.westsidemobilityplan.com/ctcspwla-timp-final-eir/>

It may also be possible for a development project applicant to fully fund a transit, bicycle, or pedestrian project from a CIP as an alternative to paying the fee directly. Some fee programs currently allow fee credits for development that expedites and completes CIP-identified projects. Using this option requires inclusion of the mitigation in a development agreement or an EIR.

Managing and reducing demand could accomplish the goal of reducing peak period VMT. The main source of congestion is typically defined as vehicles moving too slowly (i.e., peak period speeds are lower than posted speed limits). This definition of congestion describes a symptom and fails to recognize that peak period travel consists of vehicles with poor seat utilization caused by not managing demand more effectively and mispricing travel demand. The existing roadway network has a limited capacity and this capacity is routinely filled up during peak periods in Riverside County by vehicles with solo drivers (i.e., low seat utilization). Further, limited facilities exist that prioritize travel by high occupancy vehicles. Increasing vehicle

speeds and reducing delays requires substantially greater seat utilization in existing vehicles (i.e., private vehicles and public transit). This change would also reduce VMT. Hence, building a fee program with improvements that support congestion management and VMT reduction could qualify as VMT impact mitigation.

New Mitigation Program Concepts

Beyond the conventional programs described above there are two new concepts that are not currently available in Riverside County¹. For purposes of this study, these programs are defined as follows.

- **VMT Mitigation Exchange** – An exchange program is a concept where VMT generators can select from a pre-approved list of mitigation projects that may be located within the same jurisdiction or possibly from a larger area. The intent is to match the project’s needed VMT reduction with a specific mitigation project of matching size and to provide evidence that the VMT reduction will reasonably occur.
- **VMT Mitigation Bank** – A mitigation bank is intended to serve as an entity or organization that pools fees from development projects across multiple jurisdictions to spend on larger scale mitigation projects. This concept differs from the more conventional impact fee program approach described above in that the fees are directed to a few larger projects that have the potential for a more significant reduction in VMT and the program is regional in nature.

As these new mitigation program concepts are still evolving, the specific descriptions and elements of the programs will likely change. The first resource document to describe and assess these programs was recently published by U.C. Berkeley and is entitled, [“Implementing SB 743, An Analysis of Vehicle Miles Traveled Banking and Exchange Frameworks,”](#) The University of California Institute of Transportation Studies, October 2018. This document is a useful starting place for a dialogue about these programs.

The findings of the report are supportive of these concepts noting the following about the reasoning for their consideration.

Yet while methods for reducing VMT impacts—such as mileage pricing mechanisms, direct investments in new public transit infrastructure, transit access subsidies, and infill development incentives—are well understood, they may be difficult in some cases to implement as mitigation projects directly linked or near to individual developments. As a result, broader and more flexible approaches to mitigation may be necessary. In response, state and local policy makers are considering the creation of mitigation “banks” or “exchanges.” In a mitigation bank, developers would commit

¹ WRCOG is actively investigating how the agency can support, run, or promote programs such as VMT mitigation banks or exchanges to help serve WRCOG Cities and agencies.

funds instead of undertaking specific on-site mitigation projects, and then a local or regional authority could aggregate these funds and deploy them to top-priority mitigation projects throughout the jurisdiction. Similarly, in a mitigation exchange, developers would be permitted to select from a list of pre-approved mitigation projects throughout the jurisdiction (or propose their own), without needing to mitigate their transportation impacts on-site. Both models can be applied at a city, county, regional, and potentially state scale, depending on local development patterns, transportation needs and opportunities, and political will.

This reasoning is important for Menifee because mitigating VMT impacts on a project-by-project basis is challenging, especially in suburban land use contexts where travel choices are limited. That said, the UCB report and research conducted for this study identified the following key challenges with these types of programs:

- Challenges for Mitigation Exchanges
 - Potential mismatch between funds and mitigation projects available
 - Potential for reduced oversight of project selection
 - Difficulty in verifying VMT reductions and their sustainability especially with VMT

- Challenges for Mitigation Banks
 - Increased need to conduct careful CEQA/Mitigation Fee Act analysis
 - Accounting challenge in delay from fee payment to project funding
 - Greater need for program administration budget
 - Political difficulty in distributing mitigation projects and coordinating across jurisdictions

- Challenges for both Mitigation Exchanges and Mitigation Banks
 - Difficulty in verifying VMT reductions and their sustainability especially with VMT generation changing over time due to disruptive transportation trends such as transportation network companies (TNCs) and autonomous vehicles (AVs)
 - Difficulty in demonstrating an essential nexus
 - Potential opposition to mitigation not directly occurring in the project impact area especially if impacts are concentrated in or near disadvantaged communities and the mitigation occurs in more affluent areas

Another important element for either of these concepts is to have an entity that is responsible for establishing, operating, and maintaining the program. This is a potential role for a sub-regional or regional entity especially for programs that would extend mitigation projects beyond individual jurisdictional boundaries. A key part of 'operations' is that the entity will need the capability to provide verification of the VMT reduction performance and to adjust the program projects over time. Whether the entity is regional

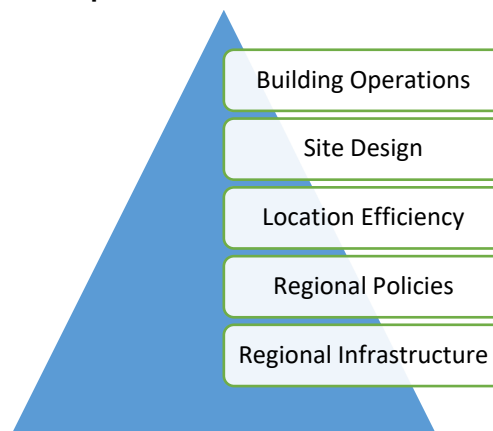
or sub-regional is another important consideration. A sub-regional entity could help minimize potential concerns about mitigation not occurring near the project site or in the same community.

The potential desire for VMT Mitigation Exchanges or Banks may depend on how lead agencies and developers respond to the initial implementation of SB 743 currently scheduled to go into effect July 1, 2020. If many projects are found to have significant VMT impacts and problems occur with finding feasible mitigation measures for individual projects, then interest may grow for more program-based mitigation.

TDM Strategies

This information can be used as part of SB 743 implementation to determine potentially feasible VMT mitigation measures for individual land use projects in the City of Menifee. An important consideration for the mitigation effectiveness is the scale for TDM strategy implementation. The biggest effects of TDM strategies on VMT (and resultant emissions) derive from regional policies related to land use location efficiency and infrastructure investments that support transit, walking, and bicycling. While there are many measures that can influence VMT and emissions that relate to site design and building operations, they have smaller effects that are often dependent on final building tenants. **Figure 1** presents a conceptual illustration of the relative importance of scale.

Figure 1: Transportation-Related GHG Reduction Measures



Of the 50 transportation measures presented in the CAPCOA 2010 report *Quantifying Greenhouse Gas Mitigation Measures*, 41 are applicable at building and site level. The remaining nine are functions of, or depend on, site location and/ or actions by local and regional agencies or funders. **Table 1** summarizes the strategies according to the scope of implementation and the agents who would implement them.

TABLE 1: SUMMARY OF TRANSPORTATION-RELATED CAPCOA MEASURES

Scope	Agents	CAPCOA Strategies (see full CAPCOA list below)
Building Operations	Employer, Manager	26 total from five CAPCOA strategy groups: <ul style="list-style-type: none"> • 3 from 3.2 Site Enhancements group • 3 from 3.3 Parking Pricing Availability group • 15 from 3.4 Commute Trip Reduction group • 2 from 3.5 Transit Access group • 3 from 3.7 Vehicle Operations group
Site Design	Owner, Architect	15 total from three strategy groups: <ul style="list-style-type: none"> • 6 from 3.1 Land Use group • 6 from 3.2 Site Enhancements group • 1 from 3.3 Parking group • 2 from 3.6 Road Access group
Location Efficiency	Developer, Local Agency	3 shared with Regional and Local Policies
Alignment with Regional and Local Policies	Regional and local agencies	3 shared with Location Efficiency
Regional Infrastructure and Services	Regional and local agencies	6 total

Of these strategies, some are likely to be effective in denser areas, while others will be less applicable in a rural or suburban setting. In the City of Menifee, key factors that determine which reduction measures will be effective, such as density and access to transit, vary throughout the City. To help narrow the list, we reviewed how land use context could influence each strategy’s effectiveness and identified seven for more detailed review. These strategies are described in Attachment B and listed below. Please note that disruptive trends, including but not limited to, transportation network companies (TNCs), autonomous vehicles (AVs), internet shopping, and micro-transit may affect the future effectiveness of these strategies.

1. Increase diversity of land uses – This strategy focuses on inclusion of mixed uses within projects and consideration of the surrounding area to minimize vehicle travel in terms of both the number of trips and the length of those trips.
2. Provide pedestrian network improvements – This strategy focuses on creating a pedestrian network within the project and connecting to nearby destinations. Projects in the City of Menifee range in size, so the emphasis of this strategy for smaller projects would likely be the construction of network improvements that connect the project sites directly to nearby destinations. For larger projects, this strategy could focus on the development of a robust pedestrian network within the project itself. Alternatively, implementation could occur through an impact fee program such as

the Riverside County Transportation Uniform Mitigation Fee (TUMF) or benefit/assessment district based on local or regional plans.

3. Provide traffic calming measures and low-stress bicycle network improvements – This strategy combines the CAPCOA research focused on traffic calming with new research on providing a low-stress bicycle network. Traffic calming creates networks with low vehicle speeds and volumes that are more conducive to walking and bicycling. Building a low-stress bicycle network produces a similar outcome. Implementation options are similar to strategy 2 above. One potential change in this strategy over time is that e-bikes (and e-scooters) could extend the effective range of travel on the bicycle network, which could enhance the effectiveness of this strategy.
4. Implement car-sharing program – This strategy reduces the need to own a vehicle or reduces the number of vehicles owned by a household by making it convenient to access a shared vehicle for those trips where vehicle use is essential. Note that implementation of this strategy would require regional or local agency implementation and coordination and would not likely be applicable for individual development projects.
5. Increase transit service frequency and speed – This strategy focuses on improving transit service convenience and travel time competitiveness with driving. While the Menifee has fixed route bus service that could be enhanced, it's also possible that new forms of low-cost demand-responsive transit service could be provided. The demand-responsive service could be provided as subsidized trips by contracting to private TNCs or Taxi companies. Alternatively, a public transit operator could provide the subsidized service but would need to improve on traditional cost effectiveness by relying on TNC ride-hailing technology, using smaller vehicles sized to demand, and flexible driver employment terms where drivers are paid by trip versus by hour. This type of service would reduce wait times for travelers and improve the typical in-vehicle travel time compared to traditional transit. Note that implementation of this strategy would require regional or local agency implementation, substantial changes to current transit practices, and would not likely be applicable for individual development projects.
6. Encourage telecommuting and alternative work schedules – This strategy relies on effective internet access and speeds to individual project sites/buildings to provide the opportunity for telecommuting. The effectiveness of the strategy depends on the ultimate building tenants and this should be a factor in considering the potential VMT reduction.
7. Provide ride-sharing programs – This strategy focuses on encouraging carpooling and vanpooling by project site/building tenants.

Because of the limitations noted above, strategies 1, 2, 3, 4, and 7 are initially considered the highest priorities for individual land use project mitigation subject to review and discussion with the project team.

Doug Darnell
Cheryl Kitzerow
City of Menifee
March 31, 2020

The VMT reduction strategies can be quantified using CACPOA calculation methodologies and recent ARB research findings. Attachment B provides calculation methodologies for each mitigation provided above, including their range of effectiveness.

Summary

To help understand the full range of VMT impact mitigation and their benefits and challenges, Table 2 provides a high-level summary comparison.

Table 2 – Summary of VMT Impact Mitigation Options

Mitigation Option	Description	Benefits	Challenges
No feasible action	This option recognizes that feasible mitigation is not available due to the land use or transportation context.	<ul style="list-style-type: none"> - Recognizes the limitations of VMT impact mitigation when alternatives to driving are not reasonably available. 	Could result in more significant and unavoidable (SAU) impacts that require an EIR instead of a negative declaration.
Change project	This option would tend to focus on changing built environment characteristics of a project such as its land use density or diversity to reduce vehicle travel.	<ul style="list-style-type: none"> - Mitigation may not require long-term monitoring (see substantial evidence summarized in the <i>SB 743 Implementation TDM Strategy Assessment Technical Memorandum dated 6.11.18</i>). - Mitigation reduces VMT (and other vehicle travel) in immediate vicinity of the project site. 	Project applicants may resist land use or other built environment changes due to financial concerns and market feasibility.
TDM	This option relies on strategies to reduce vehicle travel through incentives and disincentives often tied to the cost and convenience of vehicle travel.	<ul style="list-style-type: none"> - Mitigation reduces VMT (and other vehicle travel) in immediate vicinity of the project site. - Multiple mitigation strategies to choose from such that a project applicant may find co-benefits from the strategies also serving as project amenities. 	<ul style="list-style-type: none"> - Mitigation monitoring required because effectiveness depends on building tenants, which can change over time. As a result, impacts will remain SAU. - Creates potential financial equity issues between existing and new land uses. Existing land use with TDM mitigation will have lower operating costs.

Table 2 – Summary of VMT Impact Mitigation Options

Mitigation Option	Description	Benefits	Challenges
Impact fee program	This option requires developing a new impact fee program with a nexus based on VMT reduction. This type of nexus would allow the fee program capital improvement program (CIP) to include transit, bicycle, pedestrian and other types of projects that can demonstrate VMT reduction effectiveness.	<ul style="list-style-type: none"> - Provides clear expectations for developers about the VMT mitigation costs. - Increases funding for VMT reduction projects such that larger and more effective projects may be implemented. - May result in greater levels of VMT reduction compared to project-by-project mitigation. 	<ul style="list-style-type: none"> - Requires lead agency to develop stakeholder support and funding to create and maintain the fee program. - Mitigation (e.g., CIP projects) may not occur in immediate vicinity of the project site where impacts of vehicle travel will be most directly felt by neighbors.
Mitigation bank/exchange	This option matches VMT generators with VMT reducers within or beyond jurisdictional boundaries through a third party.	<ul style="list-style-type: none"> - Could create mitigation options that may not otherwise be available or feasible. - Not limited to jurisdictional boundaries. - Could create incentive for new innovative mitigation ideas. 	<ul style="list-style-type: none"> - Requires an entity capable of operating and maintaining the program with the ability to verify VMT reductions. - Mitigation may not occur in immediate vicinity of the project site where impacts of vehicle travel will be most directly felt by neighbors.
General plan coverage	This option would address VMT impacts through a general plan update or amendment EIR and rely on CEQA Guidelines Section 15183 for subsequent project streamlining (as summarized in the <i>SB 743 Implementation Thresholds Assessment Technical Memorandum dated 10.31.18</i>).	<ul style="list-style-type: none"> - Addresses VMT reduction expectations in consideration of other jurisdictional objectives. - Offers a wider range of mitigation options than at the project-scale. - For subsequent projects consistent with the general plan, additional VMT impact analysis would not be required. 	<ul style="list-style-type: none"> - General plan updates or amendments require substantial time and funding commitments.