



July 31, 2023

Ms. Lori Trottier  
ARDURRA GROUP, INC.  
3737 Birch Street, Suite 250  
Newport Beach, California 92660

**RE: South of Goya Project Transportation Study Screening Assessment & VMT Impact Analysis**  
Project No. 19550

Dear Ms. Trottier:

Ganddini Group, Inc. is pleased to provide this Transportation Study Screening Assessment & VMT Impact Analysis for the proposed South of Goya Project in the City of Moreno Valley. The purpose of this analysis is to assess the need for preparation of further Level of Service (LOS) analysis for general plan compliance and/or vehicle miles traveled (VMT) analysis for compliance with California Environmental Quality Act (CEQA) requirements. We trust the findings of this analysis will aid you and the City of Moreno Valley in assessing the project.

## **PROJECT DESCRIPTION**

The 13.7-acre project site is located at east of Indian Street and south of the extension of Goya Avenue in the City of Moreno Valley, California. The project site is currently vacant. The proposed project involves construction of a single-family detached housing development with 131 dwelling units. Vehicular access is proposed to be provided by one full access driveway on Indian Street and one full access driveway on Goya Avenue. The proposed site plan is shown in Attachment A.

## **PROJECT TRIPS**

Table 1 shows the proposed project trip generation based on trip generation rates obtained from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition, 2021). Trip generation rates for ITE Land Use Code 210 (Single Family Detached Housing) were determined to adequately describe the proposed land uses and were selected for this analysis.

As shown in Table 1, the proposed project is forecast to generate 1,235 daily trips, including 92 trips during the AM peak hour and 124 trips during the PM peak hour.

## **TRAFFIC IMPACT ANALYSIS EXEMPTIONS**

Certain projects, because of their size, nature, or location, are exempt from the requirements of preparing a traffic impact analysis (TIA). The criteria used to determine the need for preparation of a TIA are established in the City of Moreno Valley *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment* (June 2020) ["City TIA Guidelines"].

### **LOS SCREENING CRITERIA (NON-CEQA/GENERAL PLAN CONFORMITY)**

As specified in the City TIA Guidelines, the following activities generally will not require preparation of a TIA that includes LOS analysis:

- All residential parcel maps
- Single family residential tracts of less than 100 lots
- Apartments and multi-family projects of less than 150 units
- Plot plan and uses cases for projects of one acre or less
- Preschools
- Local serving churches, lodges, community centers, neighborhood parks and community parks (weekend peak generation analyses may be required for churches)
- Mini storage yards
- Congregate care facilities that contain significant special services, such as medical facilities, dining facilities, recreation facilities and support retail services
- Any use which can demonstrate trip generation of less than 100 vehicle trips in the peak hour.

These exemptions will apply in most cases; however, the City reserves the right to require preparation of additional traffic analysis based on existing safety, environmental, or operational concerns in the vicinity, truck intensive uses, and special event uses.

The proposed project does not meet any of the LOS exemption criteria; therefore, preparation of a TIA that includes LOS analysis will be required to evaluate General Plan conformity.

### **VMT SCREENING CRITERIA (CEQA)**

Certain projects may be presumed to result in a less than significant VMT impact based on the substantial evidence provided in the Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (State of California, December 2018) ["OPR Technical Advisory"]. As specified in the City TIA Guidelines, a project may be exempt from further VMT analysis if one or more of the following screening steps are satisfied:

- Transit Priority Area (TPA) Screening
- Low VMT Area Screening
- Project Type Screening

#### TPA Screening

Projects located within a TPA<sup>1</sup> may be presumed to have a less than significant VMT impact absent substantial evidence to the contrary. This presumption may not be appropriate if the project:

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<sup>1</sup> 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:

Major Transit Stop: an existing rail transit station, ferry terminal with bus or rail service, or the intersection of two or more major bus routes with less than 15 minute-headways during the peak commute hours (Pub. Resources Code, § 21064.3.).

High Quality Transit Corridor: A corridor with fixed route bus service with service intervals no longer than 15 minutes during the peak commute hours (Pub. Resources Code, § 21155).

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

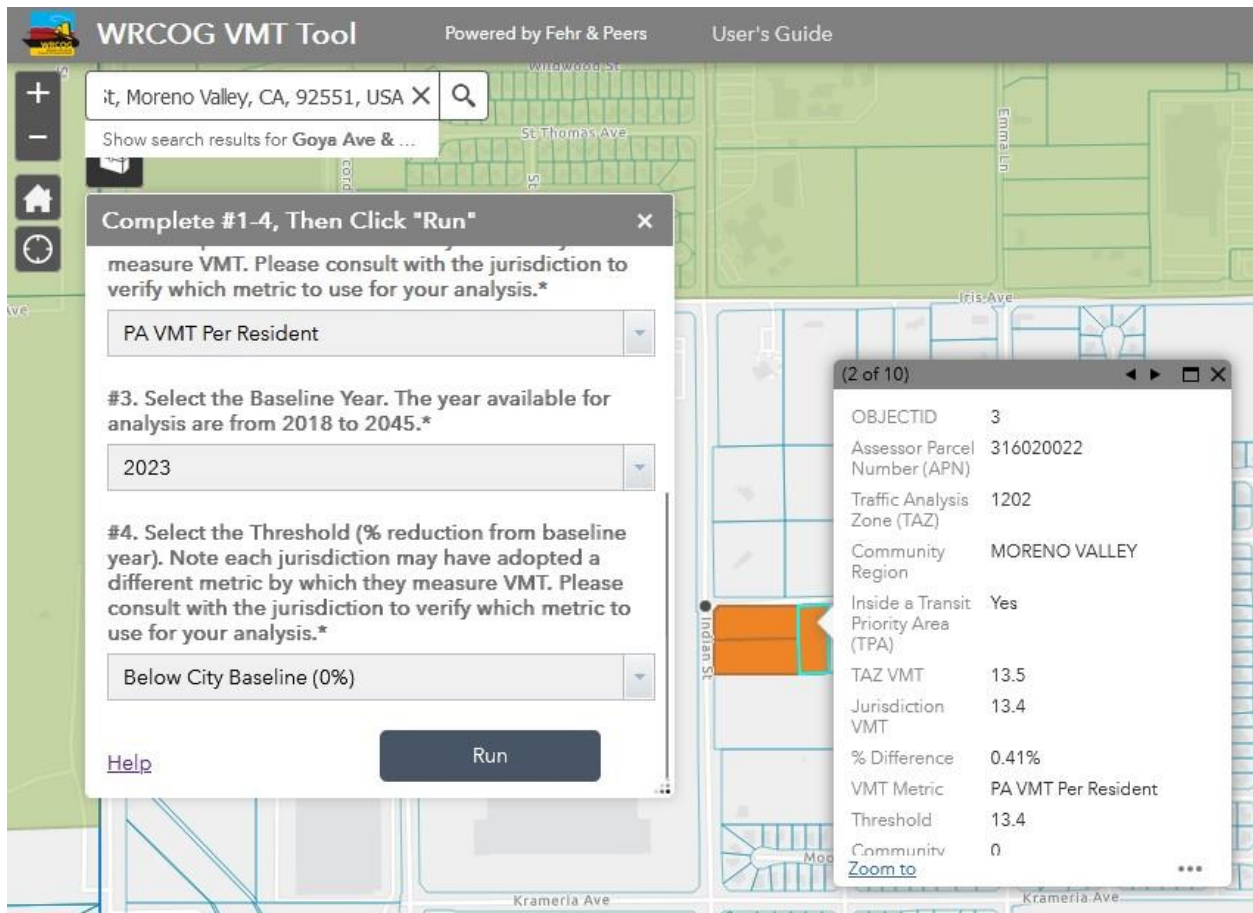
Based on the review of the Western Riverside Council of Governments (WRCOG) VMT Screening Tool, the proposed project is partially located within a TPA; however, the project has an FAR of less than 0.75. Therefore, a presumption of less than significant VMT impact based on location within a TPA may not be appropriate.

#### Low VMT Area Screening

Residential and office projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area.

To identify if the project is in a low VMT area, the WRCOG VMT Screening Tool was used. The WRCOG VMT Screening Tool was developed from the Riverside County Model (RIVCOM) travel forecasting model 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. Therefore, projects located in areas that incorporate similar features of the TAZ will tend to exhibit similar VMT. 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.

Exhibit A shows the WRCOG VMT Screening Tool results for the project site. The proposed project consists of residential uses only; therefore, the applicable screening threshold is project zone VMT per capita that does not exceed the average VMT per capita for the City of Moreno Valley.



**Exhibit A - WRCOG VMT Screening Tool Results**

As shown in Exhibit A, the project site is located within TAZ 1202, which generates 13.5 VMT per capita and exceeds the Citywide average of 13.4 VMT per capita; therefore, this screening criteria is not satisfied. The proposed project is consistent with existing residential land uses within the TAZ and there does not appear to be anything unique about the project that would otherwise be mis-represented utilizing the data from the WRCOG VMT Screening Tool.

#### Project Type Screening

Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel. In accordance with guidance from the OPR Technical Advisory, the City has established that local serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary.

In addition to local serving retail, the City TIA Guidelines identify the following uses that are also considered local serving in nature and may be presumed to have a less than significant VMT impact absent substantial evidence to the contrary:

- Local-serving K-12 schools
- Local parks

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- Day care centers
- Local-serving gas stations
- Local-serving banks
- Local-serving hotels (e.g., non-destination hotels)
- Student housing projects
- Local serving community colleges that are consistent with the assumptions noted in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- Projects generating less than 400 daily vehicle trips <sup>2,3</sup>

As previously noted, the proposed project is forecast to generate 1,235 daily trips; therefore, the proposed project does not meet the City-established project type screening.

## THRESHOLDS OF SIGNIFICANCE

Since the project does not appear to satisfy any of the City-established VMT screening criteria, further analysis was performed to assess the project's potential VMT impact relative to the following thresholds of significance established in the City TIA Guidelines:

- A project would have a significant VMT impact if, in the Existing Plus Project scenario, its net VMT per capita (for residential projects) or per employee (for office and industrial projects) exceeds the per capita VMT for Moreno Valley. For all other uses, a net increase in VMT would be considered a significant impact.
- 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. If it is not consistent with the RTP/SCS, then it would have a significant VMT impact if:
  - a. For residential projects its net VMT per capita exceeds the average VMT per capita for Moreno Valley in the RTP/SCS horizon-year.
  - b. For office and industrial projects its net VMT per employee exceeds the average VMT per employee for Moreno Valley in the RTP/SCS horizon year
  - c. For all other land development project types, a net increase in VMT in the RTP/SCS horizon-year would be considered a significant impact.

Note that the Cumulative No Project scenario shall reflect the adopted RTP/SCS; 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.

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<sup>2</sup> The OPR technical advisory 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. However, local air quality analysis has shown that various developments can have GHG production below AQMD limits with up to 400 trips per day. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 400 or fewer trips could be considered not to lead to a significant impact.

<sup>3</sup> CEQA Guidelines, § 15064.3, subd. (a), states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." As noted in OPR Technical Advisory, the term automobile refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty trucks may be included for modeling convenience and ease of calculation (e.g., where available data provides combined auto and heavy truck VMT). Therefore, it is reasonable to exclude heavy-duty trucks from VMT screening/impact assessment.

## **PROJECT VMT IMPACT ASSESSMENT**

The WRCOG VMT Tool was used to perform VMT calculations for the project, which is based on data derived from RIVCOM. The project site is in TAZ 1202, which includes other existing residential uses and would not otherwise misrepresent the proposed project.

### **EXISTING PLUS PROJECT CONDITIONS**

As previously shown on Exhibit A, the project is estimated to generate 13.5 VMT per capita for Existing Plus Project conditions, which exceeds the City-established threshold of 13.4 VMT per capita; therefore, the project would have a significant VMT impact without mitigation.

The California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities and Advancing Health and Equity Designed for Local Governments, Communities and Project Developers* (December 2021) ["CAPCOA Handbook"] is an industry standard document for guidance regarding VMT reduction measures and quantification. One of the VMT reduction measures identified in the CAPCOA Handbook includes increasing residential density. As noted in the GHG Reductions Handbook, "increasing residential density results in shorter and fewer trips by single-occupancy vehicles and thus a reduction in GHG emissions." Attachment B contains the CAPCOA worksheets and VMT reduction calculations.

The proposed project's increased density (131 DU/13.7 AC = 9.6 DU/AC) is expected to result in a VMT reduction of 1.2 percent (-0.162 VMT per capita) based on the CAPCOA guidance, resulting in project VMT of 13.3 VMT per capita. A minimum density of 9.4 dwelling units per acre would ensure the project does not exceed 13.4 VMT per capita. Therefore, the proposed project would not exceed the City-established VMT threshold of significance for Existing Plus Project conditions with mitigation to ensure the project provides increased density.

### **CUMULATIVE CONDITIONS**

The project is located within the Southern California Association of Governments (SCAG) Metropolitan Planning Organization (MPO). SCAG is the MPO responsible for development of Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the region. Through the local input process, SCAG solicited input from all 197 local jurisdictions, including the City of Moreno Valley, regarding current land use, socio-economic projections, sustainability and transit measures to develop the Connect SoCal plan. The information collected and used in development of the SCAG's long-range plans and environmental goals is documented in Data/Map Books for each jurisdiction.

Based on review of the Data/Map Book for the City of Moreno Valley, the project site is designated as Single Family Residential per SCAG's land use codes, which is consistent with the City's General Plan designation and permits single-family residential uses. Although the project involves an amendment to the City's General Plan for increased density, the increased density would contribute toward the City's allocation of the Regional Housing Needs Assessment (RHNA) as assigned to the City by SCAG. The proposed increase in density is expected to improve VMT efficiency for the project site. Furthermore, as noted in the OPR Technical Advisory: "A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa."

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Since the project is consistent with the RTP/SCS land use, contributes toward RHNA targets allocated by SCAG, and falls below an efficiency-based threshold resulting in less-than-significant project impact, cumulative VMT impacts would be less than significant.

## MITIGATION MEASURES

Based on the project VMT impact assessment presented above, the following mitigation measure is recommended to ensure the project does not exceed the City-established thresholds of significance:

### Mitigation Measure T-1

The proposed project shall provide a minimum density of 9.4 dwelling units per acre.

The proposed project would have a less than significant VMT impact based on the City-established thresholds for Existing Plus Project and cumulative conditions with implementation of Mitigation Measure T-1.

## CONCLUSIONS

The proposed project is forecast to generate 1,235 daily trips, including 92 trips during the AM peak hour and 124 trips during the PM peak hour.

The proposed project does not meet any of the LOS exemption criteria; therefore, preparation of a TIA that includes LOS analysis will be required to evaluate General Plan conformity.

The proposed project would not exceed the City-established VMT threshold of significance for Existing Plus Project conditions with mitigation to ensure the project provides increased density.

Since the project is consistent with the RTP/SCS land use, contributes toward RHNA targets allocated by SCAG, and falls below an efficiency-based threshold resulting in less-than-significant project impact, cumulative VMT impacts would be less than significant.

The proposed project would have a less than significant VMT impact based on the City-established thresholds for Existing Plus Project and cumulative conditions with implementation of Mitigation Measure T-1.

It has been a pleasure to assist you with this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 795-3100.

Sincerely,  
GANDDINI GROUP, INC.



Giancarlo Ganddini, PE, PTP  
Principal



**ATTACHMENT A**

**SITE PLAN**



**ATTACHMENT B**

**VMT REDUCTION WORKSHEETS**