



---

May 24, 2022

Ms. Cheryl A. Tubbs  
Lilburn Corporation  
1905 Business Center Drive  
San Bernardino, CA 92408

**SUBJECT: THIRTY OIL VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION**

Dear Ms. Cheryl A. Tubbs:

The following Vehicle Miles Traveled (VMT) Screening Evaluation has been prepared for the proposed Thrifty Oil (**Project**), which is located at 23682 Water Street in the County of Riverside.

## **PROJECT OVERVIEW**

It is our understanding that the project is to consist of an approximate 194,479 square foot warehouse. (See Attachment A)

## **BACKGROUND**

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which requires all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December of 2018) (**Technical Advisory**) (1). Based on OPR's Technical Advisory, the County of Riverside has recently adopted their Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled (December of 2020) (**County Guidelines**) (2). The adopted County Guidelines have been utilized to prepare this VMT screening evaluation.

## **PROJECT SCREENING**

Consistent with County Guidelines, land use projects should evaluate applicable VMT screening criteria based on their location, size, and land use type to determine if a presumption of a less than significant transportation impact can be made without the need of full project level VMT analysis. County Guidelines list seven different screening criteria. The following screening criteria were selected for review based on their applicability to the Project:

- Small Project/Low GHG Emissions Based Screening
- High Quality Transit Areas (HQTA) Screening

- Map-Based Screening
- Locally Serving Project Type

A land use project need only meet one of the above screening criteria to result in a less than significant impact.

### **SMALL PROJECT/LOW GHG EMISSIONS BASED SCREENING**

The County Guidelines identify those projects forecasted to generate greenhouse gas (GHG) emissions below 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO<sub>2e</sub>) per year are assumed to cause a less than significant VMT impact.<sup>1</sup> The Thrifty Oil Warehouse Greenhouse Gas Analysis (GHG Analysis) (Urban Crossroads, 2022) was prepared for the Project. The GHG Analysis concludes that the Project would have an annual GHG emissions of 1,706.88 MTCO<sub>2e</sub>, which does not exceed the County's identified threshold.

**Small Project/Low GHG Emissions based screening criteria is met.**

### **HIGH QUALITY TRANSIT AREAS (HQTA) SCREENING**

Projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing “major transit stop”<sup>2</sup> or an existing stop along a “high-quality transit corridor”<sup>3</sup>) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The Project is not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor.

**HQTA screening criteria is not met.**

---

<sup>1</sup> County Guidelines; Page 19.

<sup>2</sup> Pub. Resources Code, § 21064.3 (“‘Major transit stop’ means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”).

<sup>3</sup> Pub. Resources Code, § 21155 (“For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.”).

### **MAP-BASED SCREENING**

The Technical Advisory and County Guidelines note that “residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT.”<sup>4</sup> County Guidelines also state that the use of map-based screening for low VMT generating areas is applicable for other employment uses such as the Project’s industrial development. Urban Crossroads has obtained a VMT data table from County Staff for all TAZs within Riverside County that identifies VMT per capita and VMT per employee for the purposes of identifying of low VMT areas. The data utilizes the sub-regional Riverside Transportation Analysis Model (RIVTAM) to measure baseline VMT performance for individual TAZ’s and a comparison was made to the applicable impact threshold (e.g., VMT per employee for office or industrial land uses and VMT per capita for residential land uses). Utilizing the Western Riverside Council of Governments (WRCOG) Screening tool, the parcel of the Project was identified. Once identified, the Project’s TAZ was derived from the WRCOG screening tool where the Project resides in TAZ 3,731. The County’s data table identifies the Project’s TAZ 3,731 to generate 17.22 VMT per employee. Whereas the County regional threshold is 14.24 VMT per employee. The Project is not located in low VMT area.

**Map-Based screening criteria is not met.**

### **LOCAL-SERVING PROJECT TYPE SCREENING**

The County Guidelines identify that local serving uses and local essential services (e.g., local parks, day care centers, public schools, etc.) are presumed to have a less than significant impact absent substantial evidence to the contrary. The Project does not intend to develop any of the County Guidelines described local serving uses.

**Local-Serving Project Type screening criteria is not met.**

### **CONCLUSION**

In summary, the Project was found to meet the County’s Small Project/Low GHG Emissions based screening. The Project is presumed to have a less than significant impact on VMT; no further analysis is required.

---

<sup>4</sup> Page 12 of the Technical Advisory

Ms. Cheryl A. Tubbs  
Lilburn Corporation  
May 24, 2022  
Page 4 of 5

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

Respectfully submitted,

URBAN CROSSROADS, INC.

A handwritten signature in black ink, appearing to read 'Alexander So', with a long horizontal flourish extending to the right.

Alexander So  
Senior Associate

Ms. Cheryl A. Tubbs  
Lilburn Corporation  
May 24, 2022  
Page 5 of 5

## REFERENCES

1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.*  
State of California : s.n., December 2018.
2. **County of Riverside.** *Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled.*  
County of Riverside : s.n., December 2020.

**ATTACHMENT A**  
**PRELIMINARY SITE PLAN**

