

February 18, 2022

Ms. Tracy Zinn
T&B Planning, Inc.
3200 El Camino Real, Suite 100
Irvine, CA 92602

SUBJECT: COTTONWOOD AND EDGEMONT VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION

Dear Ms. Tracy Zinn:

The following Vehicle Miles Traveled (VMT) Screening Evaluation has been prepared for the proposed Cottonwood and Edgemont (**Project**), which is located on the east side of Old 215 Frontage Road, west of Edgemont Street, and south of Cottonwood Avenue in the City of Moreno Valley.

PROJECT OVERVIEW

It is our understanding that the project is to consist of two (2) 49,815 square foot warehouse buildings (for a total of 99,630 square feet). A preliminary site plan for the proposed Project is shown on Attachment A.

BACKGROUND

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require 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 2018) (**Technical Advisory**) (1). Based on OPR's Technical Advisory, the City of Moreno Valley has developed their own City of Moreno Valley Traffic Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment (June 2020) (**City Guidelines**) (2). The following evaluation has been prepared utilizing the City Guidelines.

VMT SCREENING ASSESSMENT

The City's Guidelines list standardized screening methods for project level VMT analysis that can be used to identify when a proposed land use development project is anticipated to result in a less than significant impact thereby eliminating the need to conduct a full VMT analysis. To aid in the project-level VMT screening process, the City of Moreno Valley utilizes the Western Riverside Council of Governments (WRCOG) VMT Screening Tool (**Screening Tool**). The web-based Screening Tool allows a user to select an assessor's parcel number (APN) to determine if a project's physical location meets one or more of the

land use screening methods documented in the City Guidelines. The City of Moreno Valley VMT screening steps, as described within the City Guidelines, are listed below:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Project Type Screening

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

TPA SCREENING

The Technical Advisory and City Guidelines describe that projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing “major transit stop”¹ or an existing stop along a “high-quality transit corridor”²) 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.

Based on the Screening Tool results presented in Attachment B, the Project site is not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor.

TPA screening is not met.

LOW VMT AREA SCREENING

The City Guidelines state that, “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

¹ 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.”).

² 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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service population that is similar to the existing land uses in the low VMT area.”³ The Project’s physical location, based on parcel number, is input into the Screening Tool to determine project generated VMT as compared to the City’s impact threshold. The parcel containing the proposed Project was selected and the Screening Tool was evaluated for the VMT per employee metric of VMT. Based on the Screening Tool results, the Project resides within TAZ 3,670 and was shown to generate 10.21 VMT per employee, whereas the City’s impact threshold (i.e., City of Moreno Valley) net VMT per employee is 11.01. The Project is found to be located in a low VMT area (See Attachment B).

Low VMT area screening is met.

PROJECT TYPE SCREENING

The City Guidelines identify that local serving retail buildings with less than 50,000 square feet or other local serving essential services (e.g., day care centers, public schools, medical/dental office buildings, etc.) are presumed to have a less than significant impact absent substantial evidence to the contrary.

In addition, small projects anticipated that generate low traffic volumes (i.e., fewer than 400 daily trips) and by association low greenhouse gas (GHG) emissions are also assumed to cause a less than significant impact. Trips generated by the Project’s proposed land use have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, 2021 (3). The Project is estimated to generate 462 vehicle trip-ends per day and would exceed the 400 daily trip threshold(See Attachment C).

Project type screening is not met.

CONCLUSION

In summary, the Project was evaluated against the City’s applicable VMT screening steps. The Project was found to meet the low area VMT screening criteria; no further VMT analysis required.

If you have any questions, please contact me directly at aso@urbanxroads.com.

Respectfully submitted,

URBAN CROSSROADS, INC.



Alex So
Senior Analyst

³ City Guidelines; page 23.

REFERENCES

1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
2. **City of Moreno Valley.** *Traffic Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment.* City of Moreno Valley : s.n., June 2020.
3. **Institute of Transportation Engineers.** *Trip Generation Manual.* 11th Edition. 2021.

ATTACHMENT A
PRELIMINARY PROJECT SITE PLAN



ATTACHMENT B
WRCOG VMT SCREENING TOOL

WRCOG VMT Screening Tool

Edgemont St, Moreno Valley, CA X

Show search results for Edgemont St,...

VMT Impact Screening

Input Output

Zoom in to your project location close enough that the blue parcel layer appears. Select Western Riverside County Parcels in the drop-down below, then use the black square to select your project parcels. When ready, click on the Execute button. To clear the selection or start over, click on the "X" on the output tab once the tool has run. All results based on RIVTAM Model*

Western Riverside County Parcels... [X] [Red Icon]

[Help](#) **Execute**

Layer List

All results based on RIVTAM Model.

- Output Layer
- Western Riverside County Parcels (Zoom in to view)
- Transit Priority Area
- RIVTAM TAZs with total VMT per service population below jurisdictional average under 2012 base year model
- RIVTAM TAZs with Home-based VMT per resident below jurisdictional average under 2012 base year model
- RIVTAM TAZs with Home-based work VMT per worker below jurisdictional average under 2012 base year model
- RIVTAM TAZs with total VMT per service population below WRCOG subregional average under 2012 base year model
- RIVTAM TAZs with Home-based VMT per resident below WRCOG subregional average under 2012 base year model
- RIVTAM TAZs with Home-based work VMT per worker below WRCOG subregional average under 2012 base year model
- City Boundaries
- TUMF Zone Boundaries

(1 of 2)

APN:263190015; TAZ:3,670

Within a Transit Priority Area (TPA)?
No (Fail)

Within a low VMT generating TAZ based on Total VMT?
Yes (Pass)
Jurisdictional average 2012 daily total VMT per service population = 24.49
Project TAZ 2012 daily total VMT per service population = 19.86

Within a low VMT generating TAZ based on Residential Home-Based VMT?
Yes (Pass)
Jurisdictional average 2012 daily residential home-based VMT per capita = 12.79
Project TAZ 2012 daily residential home-based VMT per capita = 9.83

Within a low VMT generating TAZ based on Home-Based Work VMT?
Yes (Pass)
Jurisdictional average 2012 daily home-based work VMT per worker = 11.01
Project TAZ 2012 daily home-based work VMT per worker = 10.21

[Zoom to](#)

(1 of 2)

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No (Fail)

Within a low VMT generating TAZ based on Total VMT?
Yes (Pass)
Jurisdictional average 2012 daily total VMT per service population = 24.49
Project TAZ 2012 daily total VMT per service population = 19.86

Within a low VMT generating TAZ based on Residential Home-Based VMT?
Yes (Pass)
Jurisdictional average 2012 daily residential home-based VMT per capita = 12.79
Project TAZ 2012 daily residential home-based VMT per capita = 9.83

Within a low VMT generating TAZ based on Home-Based Work VMT?
Yes (Pass)
Jurisdictional average 2012 daily home-based work VMT per worker = 11.01
Project TAZ 2012 daily home-based work VMT per worker = 10.21

Notes:

- TPA designation is based on October 2018 conditions.
- Screening results are based on location of parcel centroids. If results are desired considering the full parcel, please refer to the associated map layers to visually review parcel and TAZ boundary relationship.
- If VMT screening is desired for current baseline conditions, contact WRCOG for 2012 and 2040 VMT data. Interpolated VMT results can be obtained using the complete data set.
- VMT results do not account for full length of trips that occur beyond the SCAG region.

ATTACHMENT C
PROJECT TRIP GENERATION

TABLE 1: PROJECT TRIP GENERATION RATES

Land Use ¹	Units ²	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Actual Vehicle Trip Generation Rates									
General Light Industrial ³	TSF	110	0.651	0.089	0.740	0.091	0.559	0.650	4.870
Passenger Cars			0.642	0.088	0.730	0.090	0.550	0.640	4.620
2-Axle Trucks			0.001	0.001	0.002	0.001	0.001	0.002	0.042
3-Axle Trucks			0.001	0.001	0.002	0.001	0.001	0.002	0.052
4+-Axle Trucks			0.004	0.002	0.006	0.003	0.003	0.006	0.157
High-Cube Cold Storage Warehouse ³	TSF	157	0.085	0.025	0.110	0.034	0.086	0.120	2.120
Passenger Cars			0.062	0.018	0.080	0.025	0.065	0.090	1.370
2-Axle Trucks			0.003	0.007	0.010	0.005	0.005	0.010	0.260
3-Axle Trucks			0.001	0.002	0.003	0.002	0.001	0.003	0.083
4+-Axle Trucks			0.005	0.011	0.016	0.008	0.008	0.016	0.407

¹ Trip Generation & Vehicle Mix Source: Institute of Transportation Engineers (ITE), [Trip Generation Manual](#), Eleventh Edition (2021).

² TSF = thousand square feet

³ Truck Mix: South Coast Air Quality Management District's (SCAQMD) recommended truck mix, by axle type.
 Normalized % - Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks.
 Normalized % - With Cold Storage: 34.7% 2-Axle trucks, 11.0% 3-Axle trucks, 54.3% 4-Axle trucks.

TABLE 2: PROJECT TRIP GENERATION SUMMARY

Land Use	Quantity Units ¹	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Actual Vehicles:								
General Light Industrial (90%)	89.667 TSF							
Passenger Cars:		58	8	66	8	49	57	414
2-axle Trucks:		0	0	0	0	0	0	4
3-axle Trucks:		0	0	0	0	0	0	6
4+-axle Trucks:		0	0	0	0	0	0	14
Total Truck Trips (Actual Vehicles):		0	0	0	0	0	0	24
Total Trips (Actual Vehicles)²		58	8	66	8	49	57	438
High-Cube Cold Storage (10%)	9.963 TSF							
Passenger Cars:		1	0	1	0	1	1	14
2-axle Trucks:		0	0	0	0	0	0	4
3-axle Trucks:		0	0	0	0	0	0	2
4+-axle Trucks:		0	0	0	0	0	0	4
Total Truck Trips (Actual Vehicles):		0	0	0	0	0	0	10
Total Trips (Actual Vehicles)²		1	0	1	0	1	1	24
Passenger Cars		59	8	67	8	50	58	428
Trucks (Actual Vehicles)		0	0	0	0	0	0	34
Total Trips (Actual Vehicles)²		59	8	67	8	50	58	462

¹ TSF = thousand square feet

² Total Trips = Passenger Cars + Truck Trips.