

memorandum

DATE: August 27, 2021
TO: Meghan Macias, TE & Alex Garber, EPD Solutions, Inc.
FROM: Sandipan Bhattacharjee, PE, TE, AICP, ENV-SP
SUBJECT: Discovery Moreno Valley – VMT Analysis

Translutions, Inc. (Translutions) is pleased to provide this memorandum discussing the Vehicle Miles Traveled (VMT) screening evaluation for the proposed Discovery project residential project (the Project). The project will include 59 single family residential homes and is located on the northeast corner of Brodiaea Avenue and Oliver Avenue in the City of Moreno Valley. It is located within Traffic Analysis Zone 3918 of the Riverside Transportation Analysis Model (RIVTAM). This memorandum is intended to satisfy the requirements for a VMT analysis established by the *City of Moreno Valley Transportation Impact Analysis Preparation Guide for Vehicles Miles Traveled and Level of Service Assessment*, (June 2020), as well as the requirements for the disclosure of potential impacts and mitigation measures per the California Environmental Quality Act (CEQA).

BACKGROUND AND GUIDANCE

Senate Bill 743 (SB-743), which was codified in Public Resources Code section 21099, was signed by the Governor in 2013 and directed the Governor's Office of Planning and Research (OPR) to identify alternative metrics for evaluating transportation impacts under CEQA. Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Recently adopted changes to the CEQA Guidelines in response to Section 21099 include a new section (15064.3) that specifies that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts. A separate Technical Advisory issued by OPR provides additional technical details on calculating VMT and assessing transportation impacts for various types of projects.

The City of Moreno Valley has prepared the *City of Moreno Valley Transportation Impact Analysis Preparation Guide for Vehicles Miles Traveled and Level of Service Assessment* in June 2020 to address changes to CEQA pursuant to SB-743 to include VMT analysis methodology and thresholds. This evaluation is based on the July 2020 Guidelines.

VMT SCREENING EVALUATION

The guidelines include screening criteria for development projects to determine if a presumption of a non-significant transportation impact can be made on the facts of the project. This section discusses the various screening thresholds and evaluated the project under each screening threshold.

1. Transit Priority Area (TPA) Screening

Guidance. Projects located within a TPA 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 lead agency, with input from the Metropolitan Planning Organization); or
4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Project Evaluation. The proposed project is not located within a transit priority area. Further, the project will not qualify for this metric since the project has a FAR less than 0.75.

2. Low VMT Area Screening

Guidance. 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-generating area, the analyst may review the Western Riverside County (WRCOG) screening tool and apply the appropriate threshold within the tool. The threshold used by the city is based on a project's net VMT per capita (for residential projects) or per employee (for office and industrial projects) and a significant impact occurs if the project VMT (per Capita or employee) exceeds the per capita (or employee) VMT for Moreno Valley.

Project Evaluation. The proposed project was evaluated using the WRCOG screening tool. The screening map shows that the project is within a low VMT area. Figure 1 shows the screening tool map.

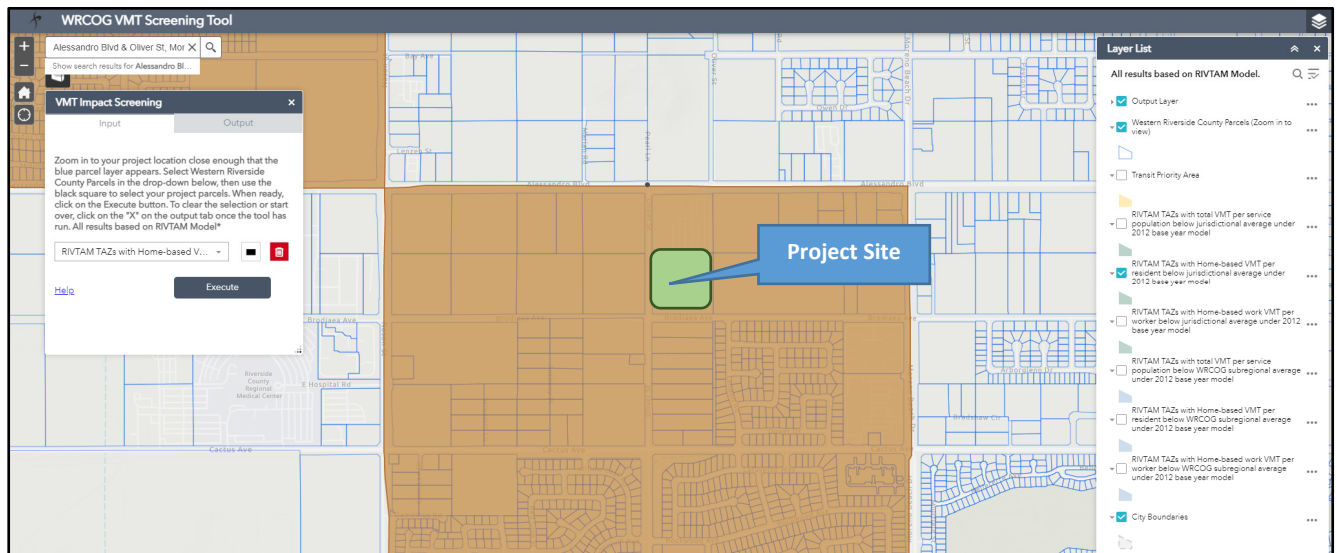


Figure 1. Low VMT Area Map Based on Home Based VMT

However, the details page of the tool shows that the Jurisdictional average 2012 daily residential home-based VMT per capita for the City of Moreno Valley is 12.79 whereas the project TAZ 2012 daily residential home-based VMT per capita is 12.84. Due to this discrepancy, RIVTAM data for the City of Moreno Valley and the TAZ was evaluated further beyond the screening map. Based on the RIVTAM runs, the City of Moreno Valley was found to have a VMT per Capita of 13.269¹ whereas the project was found to have a VMT per Capita of 13.262. Attachment A shows the socio-economic data and output from the model. **Therefore, the project screens out under the Low VMT Area threshold.**

Since the project screened out under the second screening step, further steps were not conducted.

CONCLUSION

The project falls under a low VMT area and therefore screens out from further VMT analysis.

¹ It is common to see slight variations in model outputs between each model run. The numbers reported here are from the same model run to provide an apples-to-apples comparison.

Attachment A - Model Socio-Economic Data & VMT

seq #	2012	
	Moreno Valley	Project (TAZ-3918)
Population	194,670	5,550
Residents	194,130	5,540
Households	51,040	1,350
Total Employees	30,990	2,690
MS_HBWA_VMT	346,900	31,680
MS_HBP_VMT	2,575,850	73,470
MS_TotP_VMT	3,152,790	112,940
MS_TotA_VMT	1,695,160	106,760
VMT/Capita	13.269	13.262
VMT/Employee	11.194	11.777

EXHIBIT A

Project Scoping Form

This scoping form shall be submitted to the Lead Agency to assist in identifying infrastructure improvements that may be required to support traffic from the proposed project.

Project Identification:

Case Number:	PAP21-0456
Related Cases:	
SP No.	
EIR No.	
GPA No.	
CZ No.	
Project Name:	Discovery
Project Address:	APN-486240010
Project Opening Year:	2024
Project Description:	The project proposes 67 Single Family Dwelling Units with entrances on Oliver Street and Brodiaea Avenue.

	Consultant:	Developer:
Name:	EPD Solutions	D. R. Horton Los Angeles
Address:	2 Park Plaza, Suite 1120 Irvine, CA 92614	2280 Warlow Circle, Suite 100, Corona, CA 92880
Telephone:	(949) 794-1186	(951) 272-9000
Email:	meghan@epdsolutions.com	

Trip Generation Information:

Trip Generation Data Source: ITE 11th Edition Land Use Code 210: Single Family Detached Housing.

Current General Plan Land Use:

Residential (R5)

Proposed General Plan Land Use:

DC:Downtown Commercial

Current Zoning:

R5: Suburban Residential

Proposed Zoning:

DC:Downtown Commercial

General Plan Land use and Zoning attached for current and proposed site plan.

	Existing Trip Generation			Proposed Trip Generation		
	In	Out	Total	In	Out	Total
AM Trips	0	0	0	12	35	47
PM Trips	0	0	0	40	24	63

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 3 of the guidelines related to LOS assessment and Pages 22-23 for VMT screening criteria).

Is the project screened from LOS assessment? Yes No

LOS screening justification (see Page 3 of the guidelines): _____
The project proposes the development of 67 Single Family Dwelling units which
is less than the screening threshold of Single Family Residential tracts less than
100 lots.

Is the project screened from VMT assessment? Yes No

VMT screening justification (see Pages 22-23 of the guidelines): Please see the attached VMT screening memo prepared by Translutions. It should be noted that the project is consistent with the RTP/SCS, which designates the site as Medium Density Single Family Residential with a target density of 3-8 DUs/acre. The project proposes a density of 7.61 DUs/acre. The City's VMT guidelines state that "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." Because the project is consistent with the RTP/SCS, and is located in a low VMT area, per the attached Translutions memo, the VMT impacts of the project would be considered less than significant and the project would screen out of further VMT analysis.

Level of Service Scoping

- Proposed Trip Distribution (Attach Graphic for Detailed Distribution):

North	South	East	West
%	%	%	%

Link level of service and data collection:

_____ will be required
 _____ will not be required

- Attach list of study intersections (and roadway segments if applicable)
- Attach site plan
- Other specific items to be addressed:
 - Site access
 - On-site circulation
 - Parking
 - Consistency with Plans supporting Bikes/Peds/Transit
 - Other _____
- Date of Traffic Counts _____
- Attach proposed analysis scenarios (years plus proposed forecasting approach)
- Attach proposed phasing approach (if the project is phased)

VMT Scoping

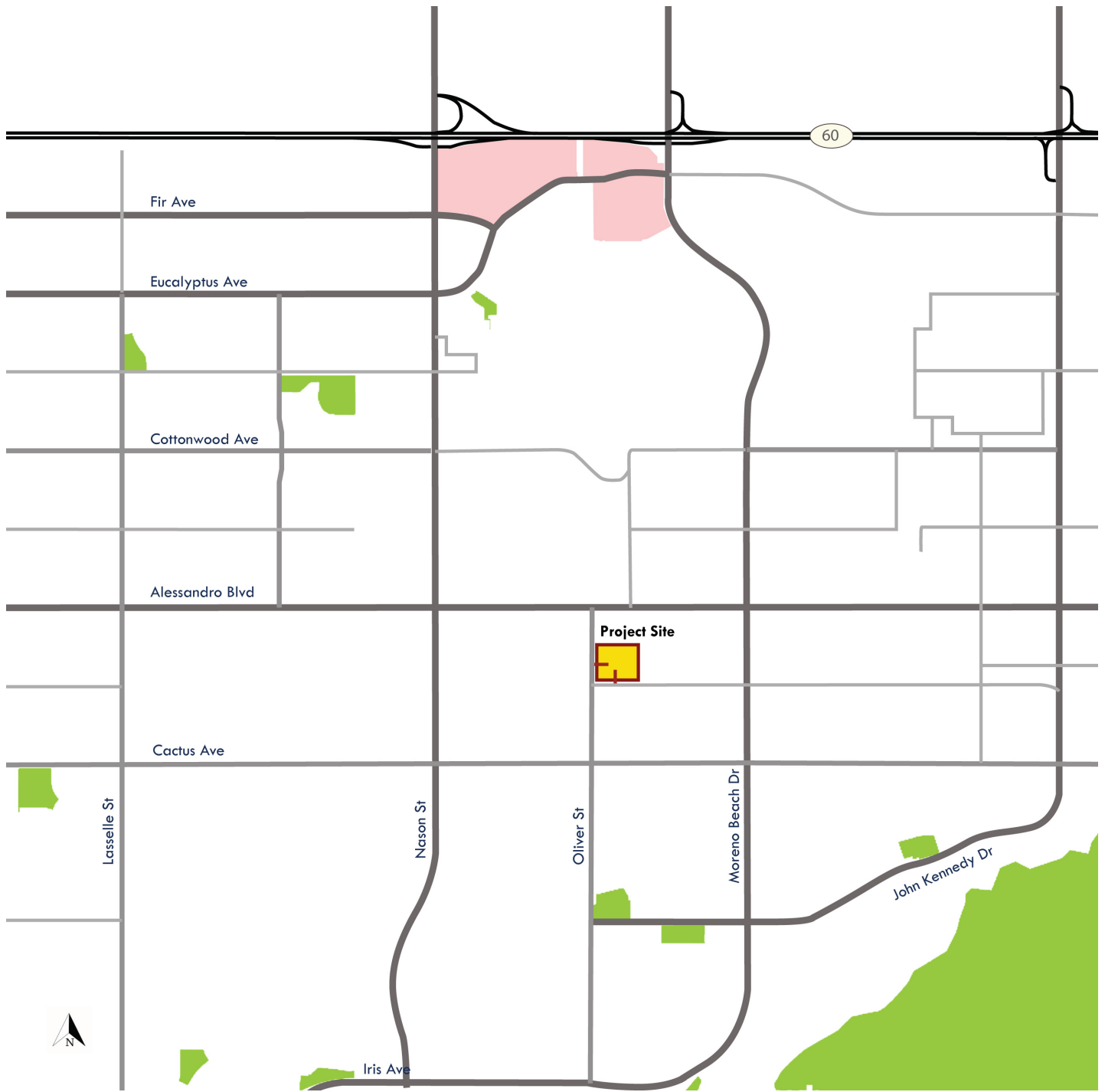
For projects that are not screened, identify the following:

- 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)

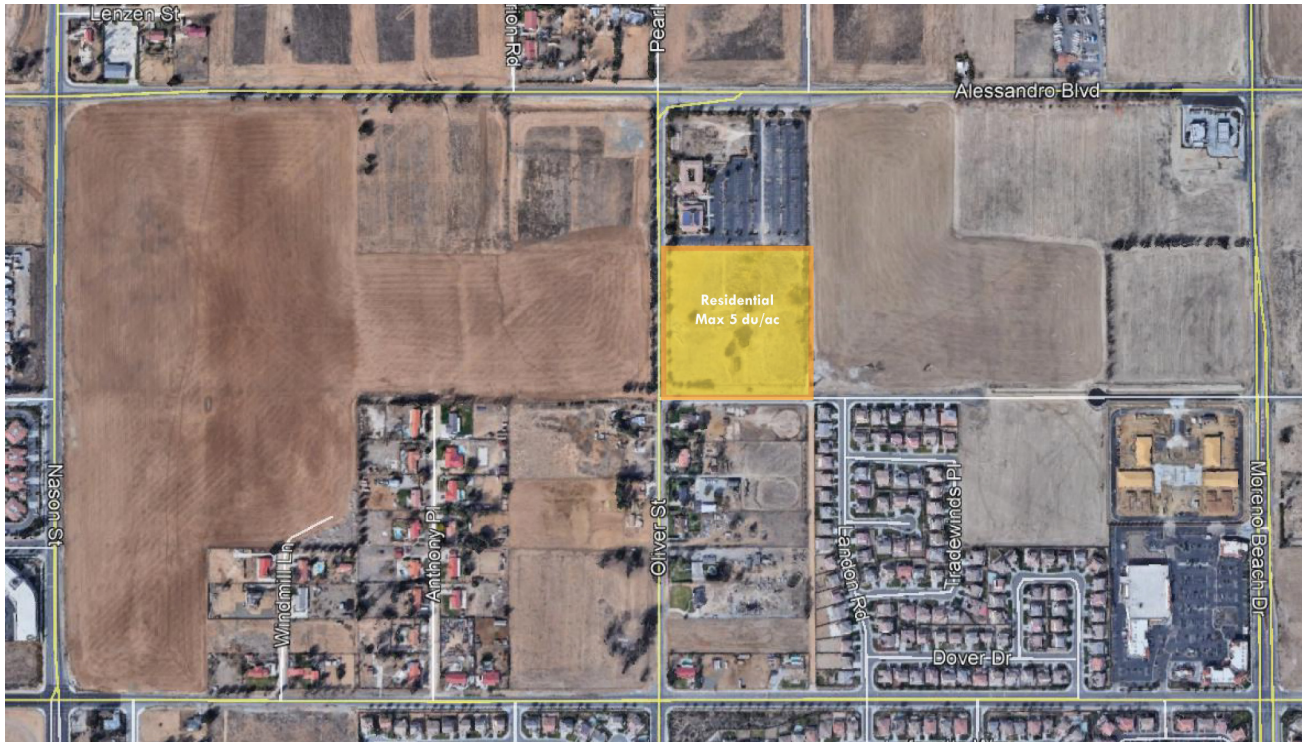
Trip Generation

Land Use	Units		Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
<u>Trip Rates</u>									
Single-Family Detached Housing ¹	DU		9.430	0.182	0.518	0.700	0.592	0.348	0.940
<u>Project Trip Generation</u>									
Single Family	67	DU	632	12	35	47	40	24	63
Total Trip Generation			632	12	35	47	40	24	63
DU = Dwelling Units									
¹ Trip rates from the Institute of Transportation Engineers, <i>Trip Generation, 11th Edition</i> , 2017. Land Use Code 210 - Single-Family Detached Housing.									

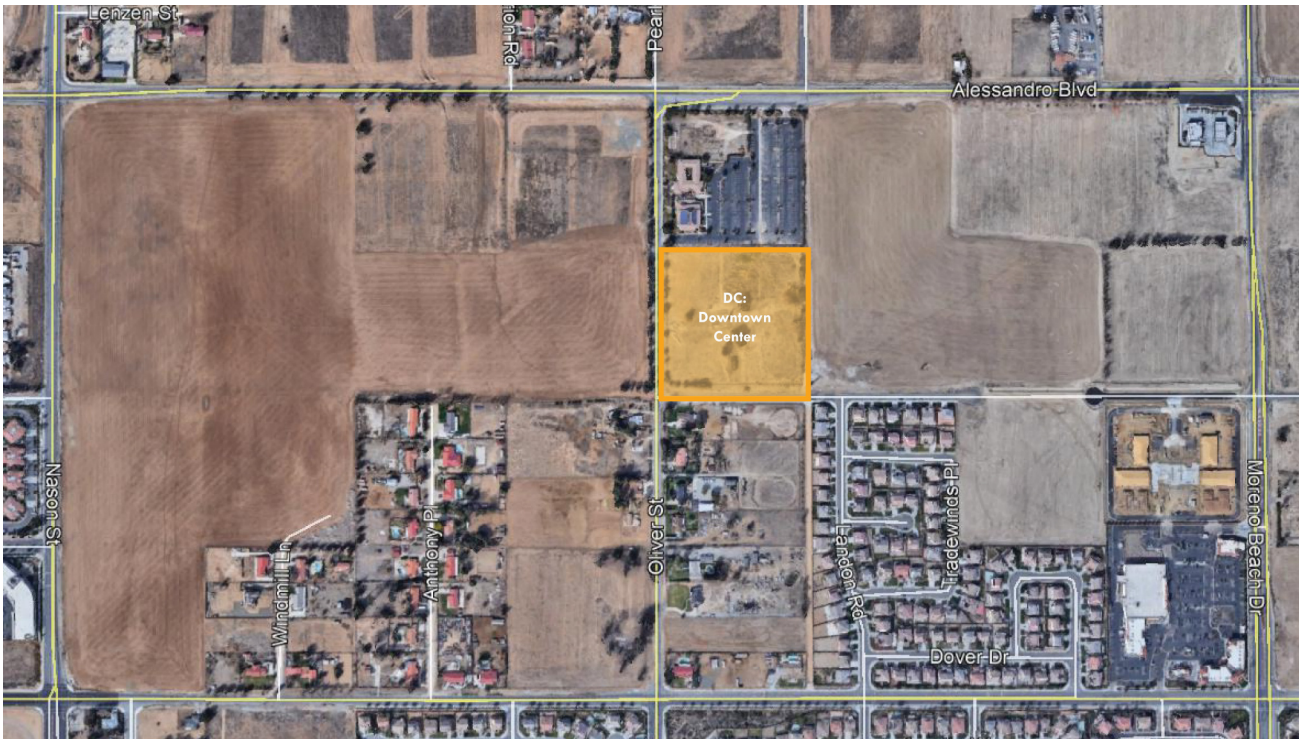
Project Location



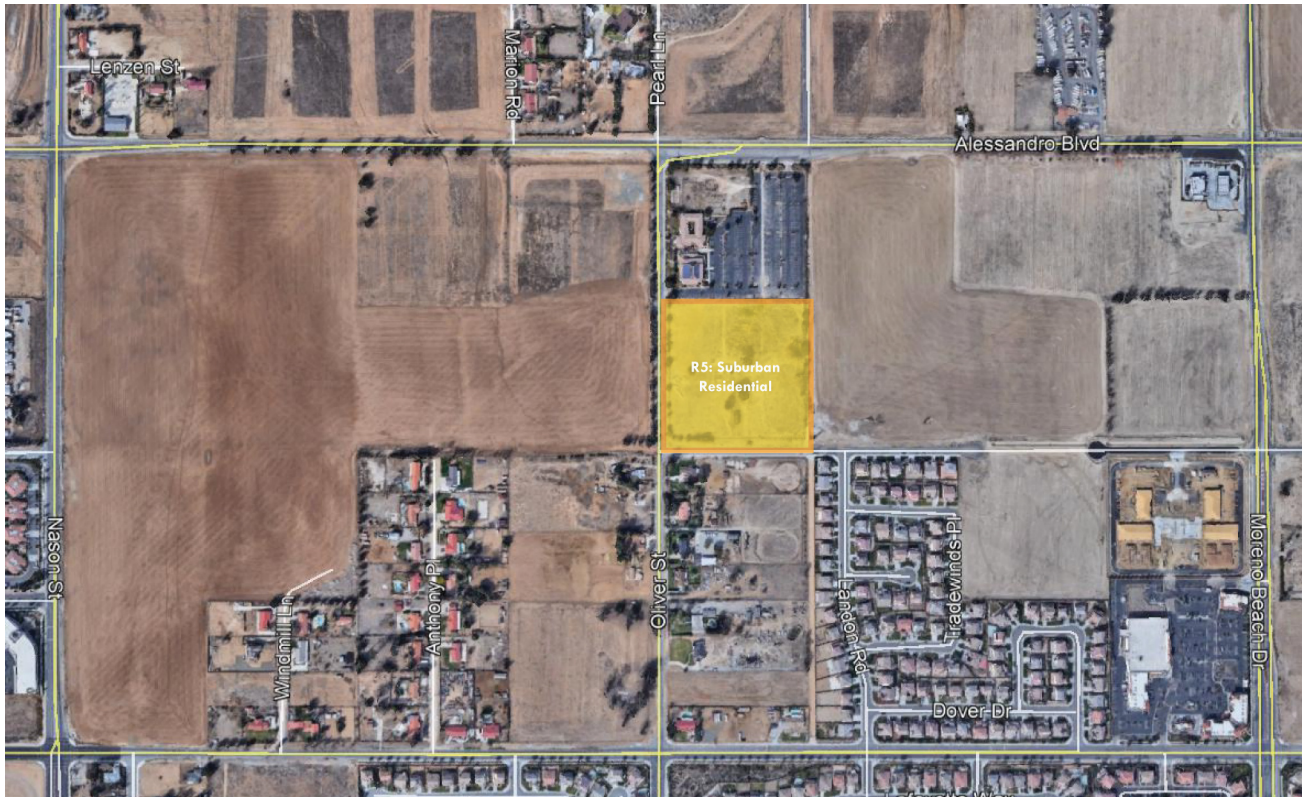
Existing General Plan Land Use



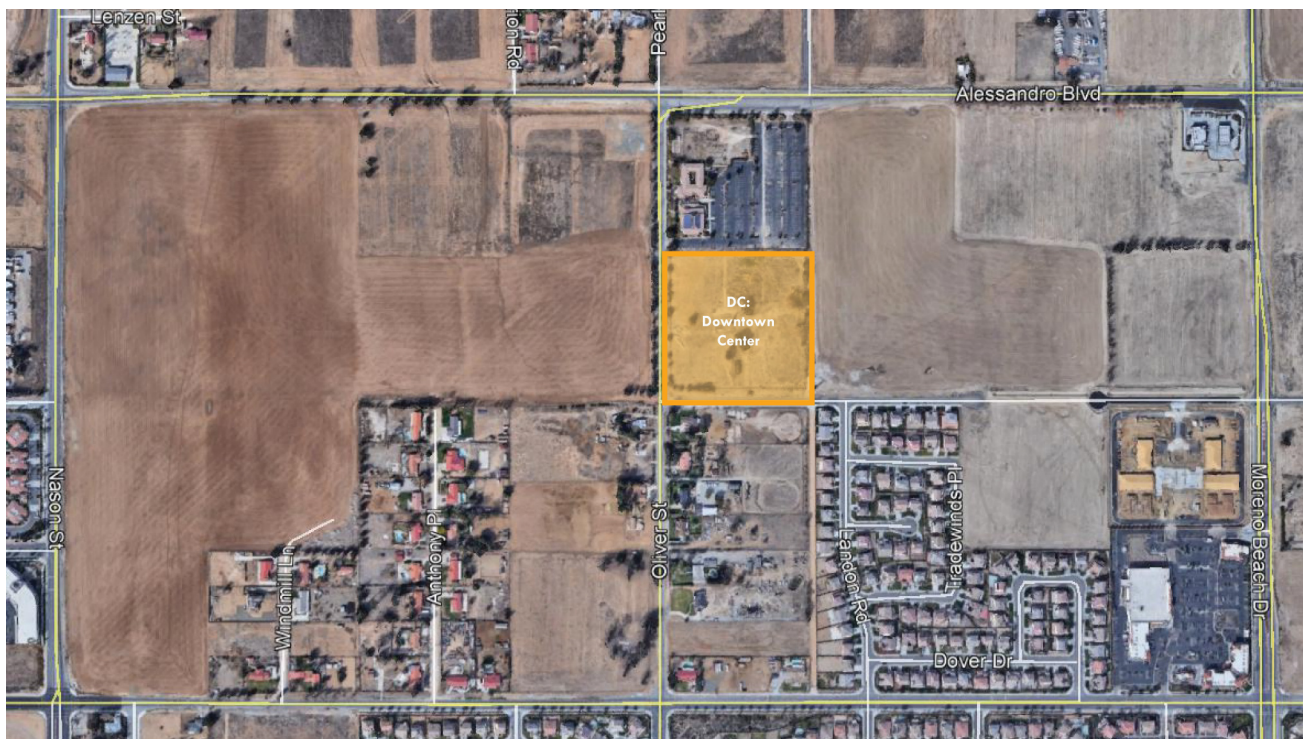
Proposed General Plan Land Use

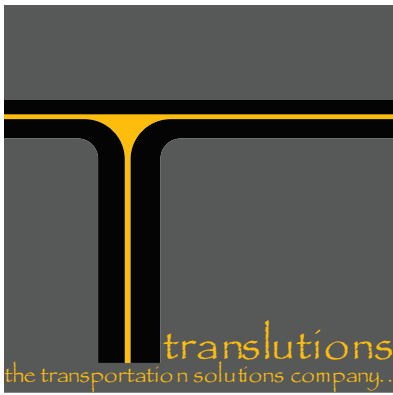


Existing Zoning



Proposed Zoning





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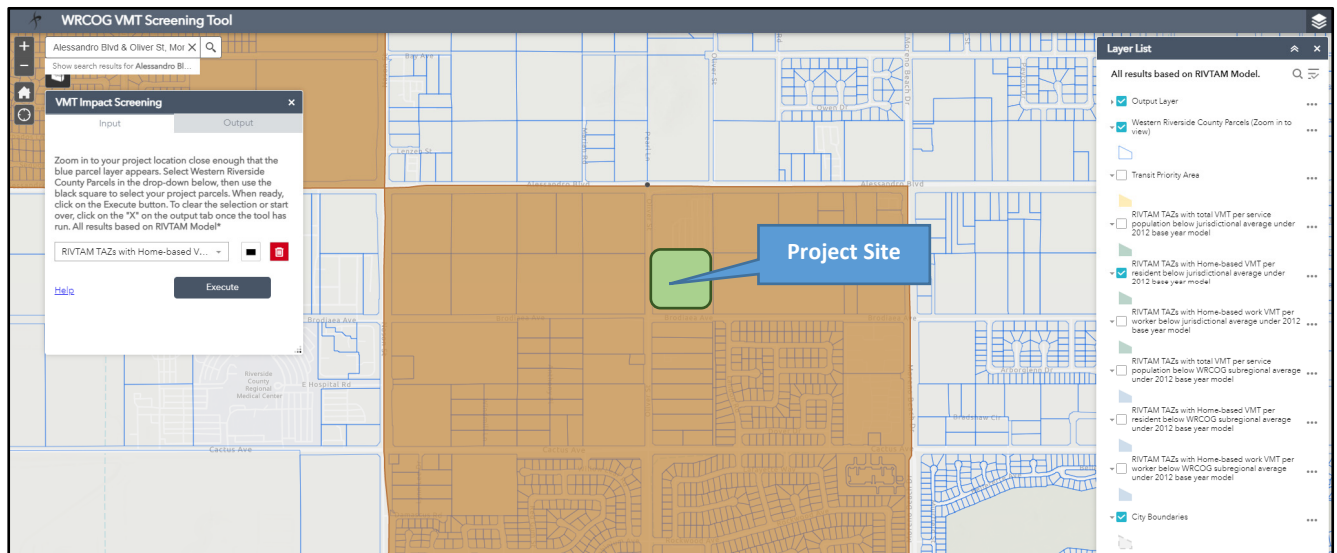


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