



April 8, 2022

Ms. Lori Trottier, Sr. Environmental Project Manager
ADURRA
3737 Birch Street, Suite 250
Newport Beach, CA 92660

RE: South of Iris Project Transportation Study Screening Assessment
Project No. 19474

Dear Ms. Trottier:

Ganddini Group, Inc. is pleased to provide this Transportation Study Screening Assessment for the proposed South of Iris Project in the City of Moreno Valley. The purpose of this analysis is to assess potential level of service (LOS) impacts for general plan compliance and vehicle miles traveled (VMT) impacts associated with the proposed project 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 9.18-acre project site is located approximately 500 feet east of Indian Street between Iris Avenue and Goya Street in the City of Moreno Valley, California. The project site is currently vacant. The proposed project involves construction of a single-family detached housing project with 78 dwelling units. Access to the project site would be provided by one access driveway on Iris Avenue and one access driveway on Goya Street. 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) per dwelling unit were determined to adequately describe the proposed land uses and were selected for this analysis.

As also shown in Table 1, the proposed project is forecast to generate a total of approximately 736 daily trips, including 54 trips during the AM peak hour and 73 trips during the PM peak hour.

CRITERIA FOR THE PREPARATION OF TRAFFIC IMPACT ANALYSES

The project has been screened for both level of service analysis and vehicle miles traveled analysis using the City of Moreno Valley established criteria.

LEVEL OF SERVICE SCREENING CRITERIA (NON-CEQA/GENERAL PLAN CONFORMITY)

As specified in the City of Moreno Valley *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment*, June 2020 ["the City guidelines"], the following types of development

proposals will generally not require preparation of a traffic impact analysis which includes Level of Service (LOS) analysis:

- Single Family Residential Tracts of less than 100 lots.
- Any use which can demonstrate, based on the most recent edition of the Trip Generation Manual published by the Institute of Transportation Engineers (ITE) or other approved trip generation data, trip generation of less than 100 vehicle trips during the peak hours.

These exemptions will apply in most cases; however, the City reserves the right to require a traffic analysis for any existing safety or environmental concern at the site or nearby intersections. The proposed project is forecast to generate fewer than 100 trips during the weekday AM and PM peak hours. Assuming the project shall construct all on-site and off-site improvements (if any) in accordance with City design standards, the project would not create any new safety or operational concerns. Therefore, the proposed project does not warrant preparation of a transportation impact study with Level of Service analysis based on the City-established screening criteria.

VEHICLE MILES TRAVELED SCREENING CRITERIA (CEQA)

The VMT screening assessment has been prepared in accordance with the City guidelines, which were developed based on guidance from the Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (State of California, December 2018) ["OPR Technical Advisory"]. The City guidelines identify screening criteria for certain types of projects that typically reduce VMT and may be presumed to result in a less than significant VMT impact. The project need only satisfy one of the following screening criteria:

- Projects located within a Transit Priority Area (TPA)
 - Projects located within one-half mile radius of major transit stop¹ or high-quality transit corridor²
- Projects located within a low VMT area
 - Site location can be verified with the web-based or map-based VMT Screening Tool
- Project Type Screening
 - Local serving land use
 - Retail land use projects which do not exceed 50,000 square feet of gross floor area
 - Existing project expansion and redevelopment projects up to 10,000 square feet³
 - Projects with trip generate less than net new 400 daily vehicle⁴ trips (ADT)

¹ A major transit stop is defined as 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 minutes headways during the peak commute hours (Pub. Resources Code, § 21064.3.).

² Fixed route bus service with less than 15 minute headways during the peak commute hours (Pub. Resources Code, § 21155).

³ As noted in OPR Technical Advisory, CEQA provides a categorical exemption for existing facilities and additions to existing structures up to 10,000 square feet so long as the project is in an area where public infrastructure is available to allow for maximum planning 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 The term vehicle refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty trucks should only be included in a traffic impact analysis for modeling convenience and ease of calculation (e.g., where data provided combine auto and heavy freight VMT), but should not contribute to a finding of significant traffic (VMT) impact under any circumstances.

TPA SCREENING

Projects located within a TPA, defined as within one-half mile of major transit stop or high-quality transit corridor, may be presumed to result in a less than significant VMT impact absent substantial evidence to the contrary. This presumption may not apply, however, 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 WRCOG with input from the SCAG); or
4. Replaces affordable residential units with a smaller number of moderate or high-income residential units.

Based on review the of the Western Riverside Council of Governments (WRCOG) VMT Screening Tool, the proposed project is located within a TPA; therefore, the project does not satisfy the TPA screening criteria (See Exhibit A).

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. Based on the City-established thresholds, a project would satisfy the low VMT screening criteria if it is located in a traffic analysis zone (TAZ) that does not exceed four percent below the existing County of San Bernardino baseline VMT per service population.

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 San Bernardino Transportation Analysis Model (SBTAM) 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. 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 is consistent with existing residential land uses in the project 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. In this case, the proposed project consists of residential uses only; therefore, the applicable service population is the resident population and the project TAZ VMT has been calculated for VMT per resident service population.

Exhibit A shows the WRCOG VMT Screening Tool results for the project site and the proposed project is located within TAZ 1,202. As shown on Exhibit A, the baseline year (2022) VMT per service population for the project TAZ is equal to 13.5 and the City-established threshold is equal to 16.2. Therefore, the proposed project does satisfy the City-established screening criteria for projects located in low VMT areas without implementation of any project design features or mitigation measures that would reduce the project's baseline VMT.

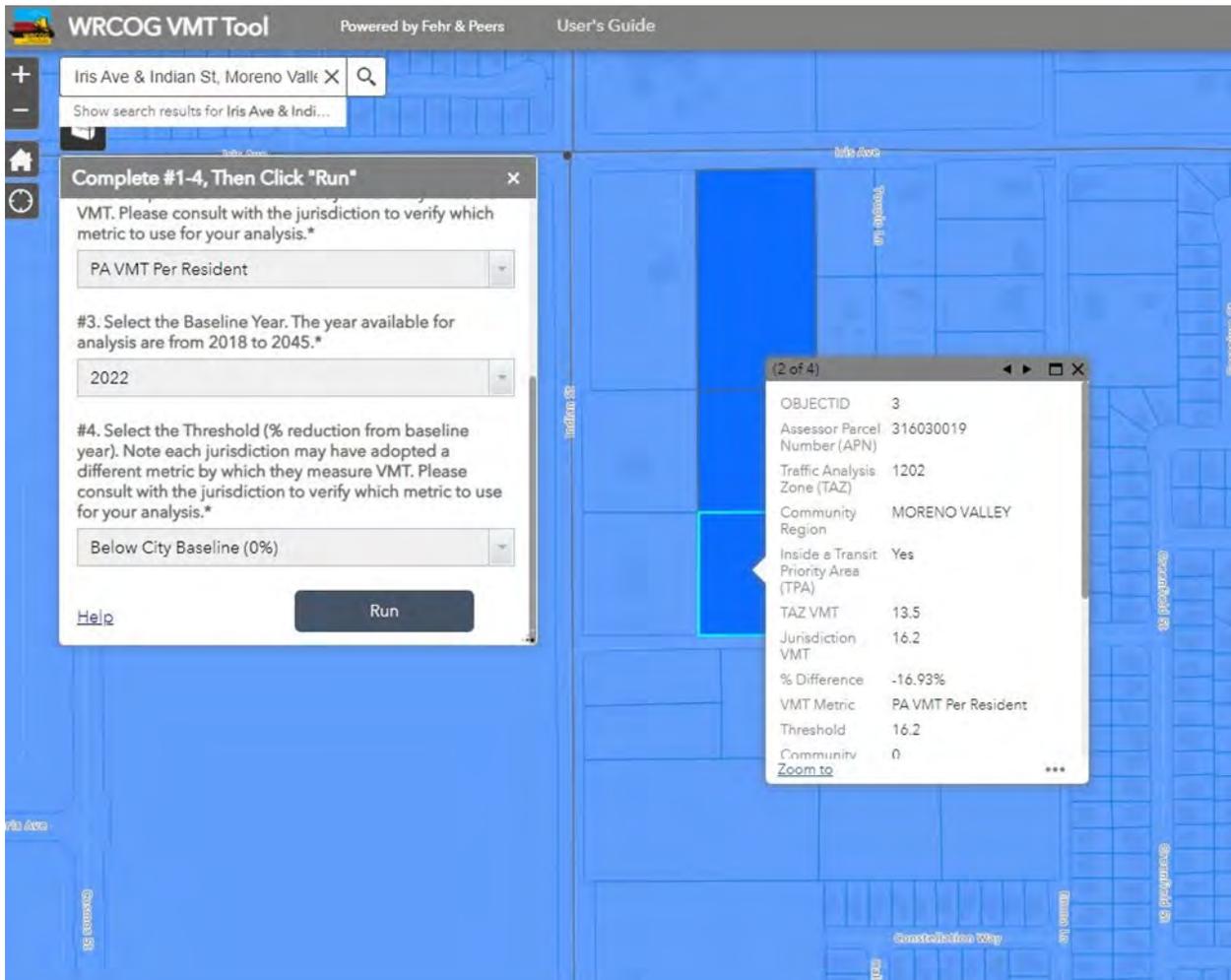


Exhibit A - WRCOG VMT Screening Tool Results

PROJECT TYPE SCREENING

The City guidelines identify the following types of projects that may be presumed to have a less than significant VMT impact as they are local serving and thus can be expected to reduce VMT or they are small enough to have a negligible impact:

- K-12 schools
- Local parks
- Day care centers
- Local-serving retail uses less than 50,000 square feet, including:
 - Gas stations
 - Banks
- Student housing projects
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- Existing projects or redevelopment of up to 10,000 additional square feet

Ms. Lori Trottier, Sr. Environmental Project Manager
ADURRA
April 8, 2022

- Projects generating less than 400⁵ daily vehicle trips. This generally corresponds to the following “typical” development potentials:
 - 42 single family housing units
 - 60 multi-family, condominiums, or townhouse housing units
 - 41,000 sq. ft. of office
 - 10,500 sq. ft. of general retail
 - 57,500 sq. ft. of light industrial
 - 112,500 sq. ft. of warehousing
 - 285,700 sq. ft. of high cube transload and short-term storage warehouse

As previously noted, proposed project is forecast to generate a total of approximately 736 daily trips and includes more than 78 single family housing units. Therefore, the proposed project does not meet the City-established criteria for project type screening.

CONCLUSIONS

The proposed project satisfies the City-established LOS screening criteria for low peak hour trip generation, and VMT screening criteria for Low VMT Area location. Therefore, the proposed project does not warrant preparation of a transportation impact study with Level of Service analysis or VMT analysis based on the City-established screening criteria.

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.



Perrie Ilercil, P.E. (AZ)
Senior Engineer



Giancarlo Ganddini, PE, PTP
Principal

⁵ Based on South Coast Air Quality Management District (SCAQMD) threshold of greenhouse gas (GHG) emissions, projects generating greenhouse gas emissions less than 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO₂e) per year may be presumed to result in a less than significant VMT impact. Local air quality analysis has shown up to 400 daily trips may not cause a significant impact.

**Table 1
Project Trip Generation**

Trip Generation Rates									
Land Use	Source ¹	Land Use Variable ²	AM Peak Hour			PM Peak Hour			Daily Rate
			% In	% Out	Rate	% In	% Out	Rate	
Single-Family Detached Housing	ITE 210	DU	26%	74%	0.70	63%	37%	0.94	9.43

Trips Generated									
Land Use	Source	Quantity	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Single-Family Detached Housing	ITE 210	78 DU	14	40	54	46	27	73	736

Notes:

- 1 ITE = Institute of Transportation Engineers Trip Generation Manual (11th Edition, 2021); ### = Land Use Code.
All rates based on General Urban/Suburban setting.
- 2 DU = Dwelling Unit.

ATTACHMENT A

SITE PLAN



Site Summary

Total Acres	9.18 Acres
Total Homes	78
Density	8.5 DU/AC
Provided Parking	199 (2.5:1 overall)
	Total Provided Assigned Parking: 156
	Total Provided Guest Parking: 43 (8'x22' Parallel)

- Notes:
1. Site plan is for conceptual purposes only.
 2. Site plan must be reviewed by planning, building, and fire departments for code compliance.
 3. Base information per parcel map.
 4. Civil engineer to verify all setbacks and grading information.
 5. Building Footprints may change due to the final design elevation style.
 6. Open space area is subject to change.
 7. Building setbacks are measured from property lines to building foundation lines.

CONCEPTUAL SITE PLAN ALTERNATIVE

SOUTH OF IRIS 2021, LLC
 MORENO VALLEY, CALIFORNIA
 03/14/22

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