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January 6, 2021

Ms. Tracy Zinn  
T&B Planning, Inc.  
17542 East 17th Street, Suite 100  
Tustin, CA 92780

**SUBJECT: MORENO VALLEY BUSINESS CENTER VEHICLE MILES TRAVELLED (VMT) ANALYSIS**

Dear Ms. Tracy Zinn:

The following Vehicle Miles Travelled (VMT) Analysis has been prepared for the proposed Moreno Valley Business Center development (**Project**), which is located on the northeast corner of Day Street and Alessandro Boulevard in the City of Moreno Valley.

## **PROJECT OVERVIEW**

The Project is proposed to consist of up to 41,122 square feet of high-cube cold storage warehouse use and 123,367 square feet of warehousing use. Trips generated by the Project's proposed land uses have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10<sup>th</sup> Edition, 2017. (1) The proposed Project is anticipated to generate a total of 310 vehicle trip-ends per day (expressed in actual vehicles). (2) The site is currently designated as Single Family Residential in the City's General Plan, which would require a land use and zoning change to Light Industrial use.

## **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**). (3) Based on OPR's Technical Advisory, the City of Moreno Valley has prepared their Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment (**City Guidelines**). (4) This analysis has been prepared based on the City Guidelines.

## **PROJECT SCREENING**

Consistent with City Guidelines, projects that meet certain screening criteria based on their location and project type may be presumed to result in a less than significant transportation impact. Consistent with

the screening criteria recommended in City Guidelines, the City of Moreno Valley will utilize the following project screening thresholds that may be applicable to the Project:

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

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

### **TPA SCREENING**

Consistent with guidance identified in the City Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing “major transit stop”<sup>1</sup> or an existing stop along a “high-quality transit corridor”<sup>2</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.

**The TPA screening threshold is not met.**

### **LOW VMT AREA SCREENING**

The City Guidelines also states 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 service population that is similar to the existing land uses in the low VMT area.”<sup>3</sup>

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<sup>1</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>2</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.”).

<sup>3</sup> City Guidelines; page 23.

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Based on the Screening Tool results provided in Attachment A, the Project is located within a low VMT generating zone. The Project resides within TAZ 3670 and was shown to generate 10.21 VMT per worker whereas the City's impact threshold is 11.01 VMT per worker. As stated previously, the site is currently designated as Single Family Residential in the City's General Plan, which would require a land use/zoning change to Light Industrial use. After further research into the TAZ, the socioeconomic area for TAZ 3670 consists primarily of retail employment and non-industrial uses. The Low VMT Area screening threshold is not applicable.

**The Low VMT Area screening threshold is not met.**

### **PROJECT TYPE SCREENING**

The City Guidelines identify that local serving retail with buildings 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 to 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. The City's small project threshold of 112,500 square feet of warehousing or 285,700 square feet of high cube transload and short-term storage warehouse land use would not be exceeded by the proposed Project's total building square footage.

**The Project Type screening threshold is met.**

### **CONCLUSION**

Based on our review of applicable VMT screening thresholds, the Project meets the Project Type screening threshold, and would result in a less than significant VMT impact. The Project was not found to meet either the TPA or Low VMT Area screening thresholds, however, meeting the Project Type screening threshold is sufficient to determine a less than significant impact; no additional VMT analysis is required.

If you have any questions, please contact me directly at [aevatt@urbanxroads.com](mailto:aevatt@urbanxroads.com).

Respectfully submitted,

URBAN CROSSROADS, INC.



Aric Evatt, PTP  
President

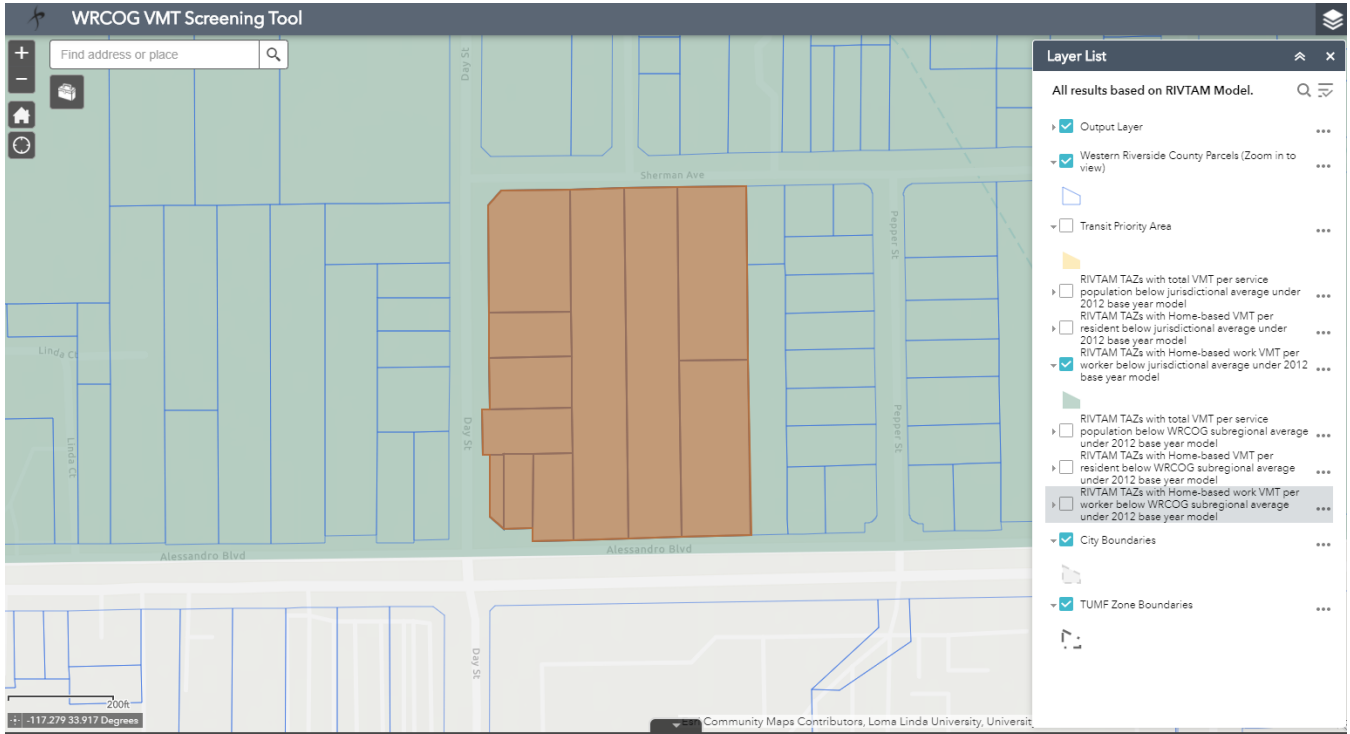


Robert Vu, PE  
Transportation Engineer

## REFERENCES

1. **Institute of Transportation Engineers.** *Trip Generation Manual.* 10th Edition. 2017.
2. **Urban Crossroads, Inc.** *Moreno Valley Business Center Project Scoping Form.* City of Moreno Valley : s.n., January 2020.
3. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
4. **City of Moreno Valley.** *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment.* City of Moreno Valley : s.n., June 2020.

**ATTACHMENT A**  
**MAP-BASED VMT SCREENING RESULTS**



OBJECTID_12_13	Within a Transit Priority Area (TPA)?	Within a low VMT generating TAZ based on Total VMT?	Within a low VMT generating TAZ based on Residential Home-Based VMT?	Within a low VMT generating TAZ based on Home-Based Work VMT?	Additional Details	Shape_Length	Shape_Area
1	No (Fail)	Yes (Pass)	Yes (Pass)	Yes (Pass)	<ul style="list-style-type: none"> <li>TPA designation is based on October 2018 conditions.</li> <li>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.</li> <li>If VMT screening is</li> </ul>	834.3312254967079	42364.69818243318

APN:291191010; 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

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.