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

Translutions, Inc. (Translutions) is pleased to provide this memorandum discussing the Vehicle Miles Traveled (VMT) screening evaluation for the proposed Valley/Whitney project residential project (the Project). The project will include 191 single family residential homes and is generally located on the southwest corner of Alessandro 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 13.269<sup>1</sup> 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.

<sup>&</sup>lt;sup>1</sup> 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.

	2012					
seq #	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				

# Attachment A - Model Socio-Economic Data & VMT

				AM Peak Hour			PM Peak Hour				
Land Use	Units	5	Daily	In	Out	Total	In	Out	Total		
<u>Trip Rates</u> Single-Family Detached Housing <sup>1</sup>	I	DU	9.430	0.182	0.518	0.700	0.592	0.348	0.940		
<u>Project Trip Generation</u> Single Family Homes	204	DU	1924	37	106	143	121	71	192		
DU = Dwelling Units <sup>1</sup> Trip rates from the Institute of Transportation Engineers, <i>Trip</i> Generation, 11th Edition, 2021. Land Use Code 210 - Single-Family Detached Housing.											