

Appendix H



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Mr. Nicholas R. Lowe, MS, PE, Senior Engineer
Albert A. Webb Associates
3788 McCray Street,
Riverside, California 92506

Subject: Sun Lakes Boulevard Extension, City of Banning, California – VMT Screening Analysis

Dear Nick:

Translutions, Inc. (Translutions) is pleased to provide this letter discussing the Vehicle Miles Traveled (VMT) for the proposed Extension of Sun Lakes Boulevard in the City of Banning.

PROJECT DESCRIPTION

The Sun Lakes Boulevard Extension is proposing to construct the segment of Sun Lakes Boulevard between Highland Home Road and Sunset Avenue. This roadway is part of the City's General Plan, and as such is consistent with the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategies (SCS). The project will include 4-lanes (two lanes in each direction) with required turn lanes, is approximately one-mile long, and also adds a bike lane and sidewalk along the roadway.

VMT DISCUSSION

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 Banning is in the process of preparing and adopting guidelines or thresholds under VMT. Therefore, this analysis is based on the Draft *Traffic Impact Analysis Guidelines For Local Transportation Analysis And Vehicle Miles Traveled Analysis* for the City of Banning.

VMT Analysis Methodology. The Guidelines state that the VMT attributable to the project (including induced demand) needs to be calculated by evaluating no project and with project conditions under the horizon scenario using RIVTAM or RIVCOM.

Impact Threshold. Based on the City's Guidelines, a net increase in induced VMT will result in a significant impact for a proposed transportation project. The increase in VMT needs to be calculated by comparing the **horizon year no-build VMT with the horizon year build VMT**. Model adjustment may be necessary to account for induced growth and potential increases in future land use as a result of the capacity enhancing transportation project.

Model VMT. The Riverside Transportation Analysis Model (RIVTAM) was run to evaluate the change in VMT for the project. The model was run for the base and future conditions and for the without and with project conditions. In addition, the socio-economic data for the Sunset Crossroads was included in the Horizon Year model since it is located adjacent to the proposed project. The model runs and data extraction process followed are consistent with standard modeling practice.

Due to the small size of the project, the project effect on VMT was compared at a 5-mile, 10-mile, and Countywide levels. Table A shows the change in VMT due to the project for the three geographic boundaries under Horizon Year (2040) conditions.

Table A: Change in Horizon Year (2040) VMT

	No Project	With Project	Change
5-Mile Radius	3,596,100	3,581,022	(15,078)
10-Mile Radius	8,374,519	8,359,646	(14,873)
Riverside County	92,860,800	92,861,278	478

As seen on Table A, the project substantially reduces VMT within a 5-mile and 10-mile radius from the project. However, as shown on Table A, the model shows that the project is likely to increase Countywide VMT by 0.0005%. This is well within the margin of error for transportation models¹, and might not result in a significant impact, and could be a result of rounding at various stages of the modeling process.

To verify if the project would indeed result in an increase in VMT, the base year model was also run to identify if the project related findings are similar. Table B shows the results of the Base Year model runs.

Table B: Change in Base Year (2012) VMT

	No Project	With Project	Change
5-Mile Radius	1,980,031	1,979,158	(872)
10-Mile Radius	4,457,790	4,456,431	(1,359)
Riverside County	53,677,825	53,657,144	(20,681)

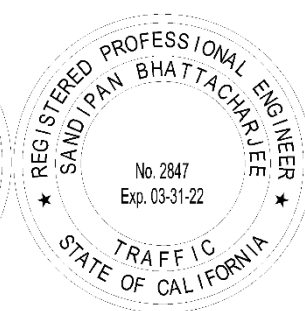
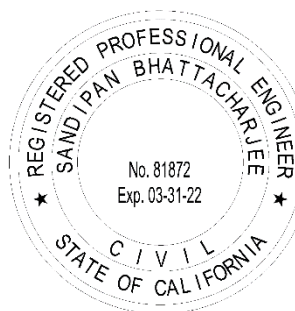
As seen on Table B, the project results in decreases in VMT under all analysis geographic limits, validating the argument that the increase in future regional VMT is within the margin of error of the model.

As seen from the above discussion, it is our professional opinion that the project will have a less than significant impact on VMT. We hope you will find this information helpful. Should you have any questions, please don't hesitate to call me at (949) 656-3131.

Sincerely,

translutions, Inc.

Sandipan Bhattacharjee, P.E., T.E., AICP, ENV SP
Principal



¹ For example, the SCAG model validation report shows that the change in VMT was in the range of -4% to +5% at a county level (within the 5-county region) for a regional VMT validation of approximately 1.7%. Therefore, the difference of 0.0005% is within acceptable model errors.