

To: City of Riverside
From: Maryam Javanmardi, Alex Garber, EPD Solutions Inc
First Submitted: 1/29/2025
Revised: 3/13/2025
Site: Massachusetts Point-EPD#24-113
Subject: Vehicle Miles Traveled (VMT) Screening Analysis Memorandum

This technical memorandum provides an evaluation of the proposed Massachusetts Point Project (proposed Project) located in the City of Riverside. The purpose of this analysis is to determine whether a Vehicle Miles Traveled (VMT) analysis is required for the Project.

This memo evaluates the proposed Project utilizing the requirements of the City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (July 2020) (City Guidelines).¹

Project Description

The proposed Project would demolish the existing 99,850 SF of structures on 2626 Kansas Avenue and redevelop 2626 Kansas Avenue and 2069 Massachusetts Avenue with two Class A light industrial buildings at 99,900 SF and 99,950 SF on approximately 10.21 acres. No development is proposed on APN 210-130-020 (1989 Massachusetts Avenue). The proposed Project site plan is shown in Figure 1.

Project Trip Generation

The proposed Project trip generation was analyzed using the General Light Industrial (GLI) (Land Use Code 110) trip rate from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition (2021). The existing and proposed industrial buildings were analyzed as GLI; however, a conservative approach was taken by applying the warehouse truck split, which is higher than the truck split typically associated with GLI. Therefore, the vehicle splits from the South Coast Air Quality Management District (SCAQMD) and the passenger vehicle/truck split from the ITE warehouse rate (Land Use code 150) were applied in the analysis.

Table 1 presents the trip generation estimate for both the existing use and the proposed Project. As shown in Table 1, the existing site is estimated to generate 487 daily trips, with 74 trips during the AM peak hour and 66 during the PM peak hour. The proposed Project would generate a total of 974 daily trips, with 148 AM and 132 PM peak hour trips. Therefore, the proposed Project is forecast to generate 487 net daily trips, with 74 net trips during the AM peak hour and 66 net trips during the PM peak hour.

When considering only passenger vehicle trips, the existing use site is estimated to generate 462 daily passenger vehicle trips, including 71 trips during the AM peak hour and 64 trips during the PM peak hour, while the proposed Project is forecast to generate 632 daily passenger vehicle trips, including 96 trips

¹ Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (2020).

<https://riversideca.gov/publicworks/sites/riversideca.gov.publicworks/files/docs/Traffic/TIA%20Guidelines%20-%20July%202020-Final.pdf>

during the AM peak hour and 84 trips during the PM peak hour. Therefore, the proposed Project is forecast to generate 170 net daily passenger vehicle trips, with 25 net trips during the AM peak hour and 20 net trips during the PM peak hour.

Table 1: Project Trip Generation

Land Use	Units	AM Peak Hour			PM Peak Hour			
		Daily	In	Out	Total	In	Out	Total
<u>Trip Rates</u>								
110 - General Light Industrial ¹	TSF	4.87	0.65	0.09	0.74	0.09	0.56	0.65
Existing Project Trip Generation								
Total Building Square Footage	99,850	TSF						
Existing General Light Industrial ¹	99,850	TSF	487	65	9	74	10	56
Vehicle Mix²		Percent						
Passenger Vehicles		94.90%	462	62	9	71	10	54
2-Axle Trucks		0.85%	4	1	0	1	0	0
3-Axle Trucks		1.06%	5	0	0	0	0	0
4+-Axle Trucks		3.19%	16	2	0	2	0	2
		100%	487	65	9	74	10	56
Total Existing Passenger Trip Generation			462	62	9	71	10	54
Total Existing Trip Generation			487	65	9	74	10	56
Proposed Project Trip Generation								
Total Building Square Footage	199,850	TSF						
Building 1	99,900	TSF						
Proposed General Light Industrial ¹	99,900	TSF	487	65	9	74	10	56
Vehicle Mix²		Percent						
Passenger Vehicles		64.90%	316	42	6	48	6	36
2-Axle Trucks		12.18%	59	8	1	9	1	7
3-Axle Trucks		3.86%	19	3	0	3	1	2
4+-Axle Trucks		19.09%	93	12	2	14	2	11
		100%	487	65	9	74	10	56
Building 2	99,950	TSF						
Proposed General Light Industrial ¹	99,950	TSF	487	65	9	74	10	56
Vehicle Mix²		Percent						
Passenger Vehicles		64.90%	316	42	6	48	6	36
2-Axle Trucks		12.18%	59	8	1	9	1	7
3-Axle Trucks		3.86%	19	3	0	3	1	2
4+-Axle Trucks		19.09%	93	12	2	14	2	11
		100%	487	65	9	74	10	56
Total New Passenger Trip Generation			632	84	12	96	12	72
Total New Trip Generation			974	130	18	148	20	112
Net New Passenger Trip Generation			170	22	3	25	2	18
Net New Trip Generation			487	65	9	74	10	56

TSF = Thousand Square Feet

¹ Trip rates from the Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021. Land Use Code 110 - General Light Industrial.

² Passenger Vehicle and Truck Rate from ITE Land Use 110 - General Light Industrial. Note that Daily Truck Rates were used for analysis. Truck Rates were normalized using truck splits from SQAMD Warehouse Truck Trip Study, July 17, 2014. Without Cold Storage.

³ Passenger Vehicle and Truck Rate from ITE Land Use 150 - Warehouse. Note that Daily Truck Rates were used for analysis. Truck Rates were normalized using truck splits from SQAMD Warehouse Truck Trip Study, July 17, 2014. With Cold Storage.

* The table might contain minor rounding errors due to multiple rates and or percentages being applied. Priority was placed on the total trips and total PCE trips. The minor rounding errors would not impact the overall analysis.

Vehicle Miles Traveled Screening

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating Transportation impacts, aiming to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. In response, Section 15064.3 - Determining the Significance of Transportation Impacts, was added to the CEQA Guidelines which states that VMT is the most appropriate measure of transportation impacts and shall apply statewide beginning on July 1, 2020.

The City's Guidelines provide the following screening thresholds to identify if a project would be considered to have a less-than-significant impact on VMT and therefore could be screened out from further VMT analysis:

1. Transit Priority Area (TPA) Screening
2. Low VMT Area Screening
3. Project Type Screening
4. Mixed-Use Projects
5. Redevelopment Projects

If a project meets one of the criteria above, then the VMT impact of the project would be presumed less-than-significant and no further analysis of VMT would be required.

Screening Criteria 1 - Transit Priority Area (TPA) Screening

Per the City's Guidelines, projects located in a TPA may be presumed to have a less-than-significant impact. 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 City); or
4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The Western Riverside Council of Governments (WRCOG) VMT screening tool output for TPA is shown in Figure 2. As shown in Figure 2, the proposed Project is not within a TPA area. Therefore, the proposed Project would not satisfy the requirements of Screening Criteria 1.

Screening Criteria 2 - Low VMT Area Screening

The City's guidelines include a screening threshold for projects located in a low-VMT generating area, which is defined as traffic analysis zones (TAZs) with a daily VMT/employee that is less than the baseline level for the City of Riverside, which is defined as the average VMT/employee for the City of Riverside for the baseline year (2025) of this analysis. For projects that are inconsistent with the land use assumptions coded into the projects' TAZ, this screening criteria would not be appropriate, and the project would not satisfy the requirements of Screening Criteria 2.

The proposed Project is located in TAZ 2101. The proposed Project is consistent with the existing General Plan land use category applicable to the Project site. The Project site has a General Plan Land Use designation of Industrial (I) and is zoned I - General Industrial. The City of Riverside General Plan states that the primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, support commercial uses, and warehouse and distribution facilities only at specific locations. The purpose of the Industrial zone is to provide areas appropriate for a wide variety of industrial, manufacturing, and support uses that have the potential to provide jobs and generate tax revenue in Riverside, while protecting residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals and other

public places from nuisances or hazards associated with such activities. Therefore, using the WRCOG screening tool to determine Low VMT Area Screening is appropriate.

The City has released an amendment to the City's VMT thresholds of significance, included as Attachment-Resolution 24201, stating that the City's significant threshold for VMT has changed from 15% below the City's baseline to the City's baseline.² As directed by the City, the City's baseline is considered as the screening threshold. Therefore, the proposed Project was analyzed using VMT per employee, with the City's baseline as the threshold. The WRCOG VMT screening tool output for low-VMT generating areas is shown in Figure 3.

As shown in Figure 3, the proposed Project is located in a low VMT generating area and would thus not exceed the City's VMT baseline. Therefore, the proposed Project would satisfy the requirements of Screening Criteria 2.

Screening Criteria 3 - Project Type Screening

Per the City's guidelines, projects that propose local-serving retail (defined as retail projects that are less than 50,000 square feet) or other local-serving uses would have a less-than-significant impact on VMT. Types of projects that are considered local-serving include local parks, day care centers, gas stations, banks, local-serving restaurants (including those with drive-thru), local-serving hotels, and local-serving community colleges that are consistent with the assumptions noted in the RTP/SCS. Additionally, the project type screening would apply to projects which generate fewer than 110 daily net new vehicle trips.

The proposed Project does not propose a local serving land use and would generate more than 110 daily net new vehicle trips; therefore, the proposed Project would not satisfy the requirements of Screening Criteria 3.

Screening Criteria 4 – Mixed-Use Projects

City Guidelines state that a mixed-use project may be evaluated for its individual components and apply the threshold of significance for each project type included. The proposed Project does not include a mix of uses; therefore, the proposed Project would not satisfy the requirements of Screening Criteria 4.

Screening Criteria 5 – Redevelopment Projects

As outlined in the City's guidelines, projects that replace existing VMT-generating land uses with alternatives that result in a net reduction in VMT are considered to have a less-than-significant impact. However, since the proposed Project results in a net increase in daily trips and would have a comparable trip type (industrial VMT/employee), the proposed Project does not satisfy the requirements of Screening Criteria 5.

Summary

The proposed Project was evaluated using the City's Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service thresholds to determine if a VMT analysis is required. The proposed Project site is located within a Low VMT area and meets Screening Criteria 2. Therefore, the proposed Project meets the City's VMT screening criteria, is presumed to have a less-than-significant VMT impact, and no further VMT analysis is required.

² Amendment to Resolution 24201

Figure 1: Project Site Plan

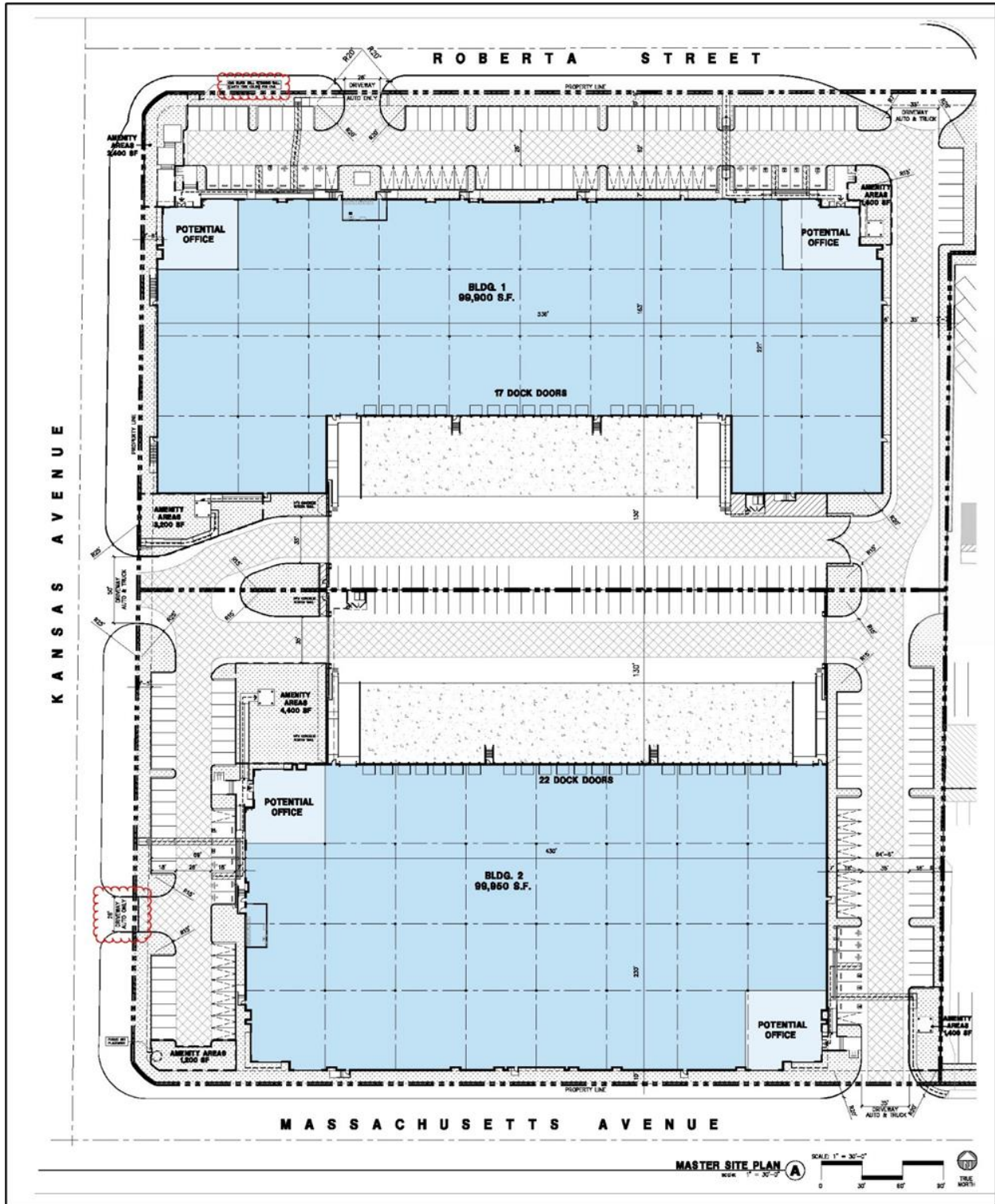


Figure 2: TPA Output from WRCOG VMT Screening Tool

WRCOG VMT Tool Powered by Fehr & Peers User's Guide

2626 Kansas Ave, Riverside, CA, X

Show search results for 2626 Kansas ...

Complete #1-4, Then Click "Run"

have adopted a different metric by which they measure VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*

PA VMT Per Worker

#3. Select the Baseline Year. The year available for analysis are from 2018 to 2045.*

2025

#4. Select the Threshold (% reduction from baseline year). Note each jurisdiction may have adopted a different metric by which they measure VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*

Below City Baseline (0%)

[Help](#) **Run**

(1 of 5)

OBJECTID	1
Completely within a TPA?	No (Fail)
Within a low VMT generating TAZ?	Yes (Pass)
Note	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.
Community Regions have different thresholds (1=Yes, 0=No)	0

[Zoom to](#)

Layer List

Layers

- Output_Parcel
- Selected Project Area
- Low VMT Generating TAZs
- TAZ Boundaries (Zoom in to view)
- Parcels (Zoom in to view)
- Transit Priority Area
- WRCOG Cities
- WRCOG Boundary

Figure 3: Low VMT Generating Area Output from WRCOG VMT Screening Tool

WRCOG VMT Tool Powered by Fehr & Peers User's Guide

Search: 2626 Kansas Ave, Riverside, CA, X

Complete #1-4, Then Click "Run"

have adopted a different metric by which they measure VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*

PA VMT Per Worker

#3. Select the Baseline Year. The year available for analysis are from 2018 to 2045.*

2025

#4. Select the Threshold (% reduction from baseline year). Note each jurisdiction may have adopted a different metric by which they measure VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*

Below City Baseline (0%)

Run

Layer List

- Output_Parcels
- Selected Project Area
- Low VMT Generating TAZs
- TAZ Boundaries (Zoom in to view)
- Parcels (Zoom in to view)
- Transit Priority Area
- WRCOG Cities
- WRCOG Boundary

(3 of 6)	
OBJECTID	858
TAZ	2101
VMT Metric	PA VMT Per Worker
TAZ VMT	15.876552389259258
Community Region VMT	16.256583558888888
Threshold	16.3
% Difference	-2.34%
Results	Yes (Pass)
Shape_Length	15030.585567189233
Shape_Area	13351475.991820646
Zoom to	

Riverside Municipal Airport 1mi

City of Riverside, County of Riverside, California

Attachment-Resolution 24201

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RESOLUTION NO. 24201

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIVERSIDE, CALIFORNIA AMENDING RESOLUTION NO. 23589 TO REVISE THE “VEHICLE MILES TRAVELED” THRESHOLDS OF SIGNIFICANCE FOR PURPOSES OF ANALYZING TRANSPORTATION IMPACTS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, the California Environmental Quality Act Guidelines (“CEQA Guidelines”) encourage public agencies to develop and publish generally applicable “thresholds of significance” to be used in determining the significance of a project’s environmental effects; and

WHEREAS, CEQA Guidelines section 15064.7(a) defines a threshold of significance as “an identifiable quantitative, qualitative or performance level of a particular environmental effect, noncompliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant”; and

WHEREAS, CEQA Guidelines section 15064.7(b) requires that thresholds of significance must be adopted by ordinance, resolution, rule, or regulations, developed through a public review process, and be supported by substantial evidence; and

WHEREAS, pursuant to CEQA Guidelines section 15064.7(c), when adopting thresholds of significance, a public agency may consider thresholds of significance adopted or recommended by other public agencies provided that the decision of the agency is supported by substantial evidence; and

WHEREAS, Senate Bill 743, enacted in 2013 and codified in Public Resources Code section 21099, required changes to the CEQA Guidelines regarding the criteria for determining the significance of transportation impacts of projects; and

WHEREAS, in 2018, the Governor’s Office of Planning and Research (“OPR”) proposed, and the California Natural Resources Agency certified and adopted, new CEQA Guidelines section 15064.3 that identifies vehicle miles traveled (“VMT”) – meaning the amount and distance of automobile travel attributable to a project – as the most appropriate metric to evaluate a project’s transportation impacts; and

1 WHEREAS, as a result, automobile delay, as measured by “level of service” and other
2 similar metrics, generally no longer constitutes a significant environmental effect under CEQA; and

3 WHEREAS, on June 16, 2020, the City Council adopted Resolution No. 23589 which
4 adopted VMT thresholds of significance for purposes of analyzing transportation impacts under the
5 CEQA; and

6 WHEREAS, CEQA Guidelines section 15064.3 went into effect on July 1, 2020; and

7 WHEREAS, in recognition that the City, as a whole, is the dense urban center of the county
8 and in general experiences reduced VMT per capita, the City desires to revise the VMT thresholds of
9 significance to be at the current jurisdiction baseline; and

10 WHEREAS, on November 6, 2024, the Transportation Board of the City of Riverside,
11 California, considered revising the City’s VMT thresholds of significance to be the current
12 jurisdictional baseline VMT per capita for residential projects and the current jurisdictional baseline
13 VMT per employee for new office and industrial projects and revise the Traffic Impact Analysis
14 Guidelines accordingly, and recommended to the City Council that the revisions to the VMT
15 thresholds of significance and Traffic Impact Analysis Guidelines be approved; and

16 WHEREAS, on November 21, 2024, the Planning Commission of the City of Riverside,
17 California, considered revising the City’s VMT thresholds of significance to be the current
18 jurisdictional baseline VMT per capita for residential projects and the current jurisdictional baseline
19 VMT per employee for new office and industrial projects and revise the Traffic Impact Analysis
20 Guidelines accordingly; and recommended to the City Council that the revisions to the VMT
21 thresholds of significance and Traffic Impact Analysis Guidelines be approved; and

22 WHEREAS, the City Council of the City of Riverside advertised for and held a public
23 hearing on December 17, 2024, to consider revising the City’s VMT thresholds of significance for
24 purposes of analyzing transportation impacts under the CEQA to be the current jurisdictional
25 baseline VMT per capita for residential projects and the current jurisdictional baseline VMT per
26 employee for new office and industrial projects and revise the Traffic Impact Analysis Guidelines;
27 and

28

1 WHEREAS, the City Council received and considered the reports and recommendations
2 from the Transportation Board, the Planning Commission, and all other testimony, whether written
3 or oral, presented at the public hearing.

4 NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Riverside,
5 California, as follows:


6 Section 1: The foregoing recitals are all true and correct.

7 Section 2: Resolution No. 23589 is hereby amended by revising the following sections:

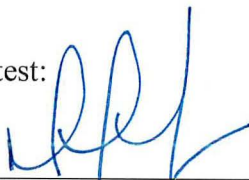
- 8 1. For new residential projects, utilizing a threshold consistent with the City's current
9 jurisdictional baseline VMT Per Capita.
- 10 2. For new office and industrial projects, utilizing a threshold consistent with the City's
11 current jurisdictional baseline VMT Per Employee.

12 Section 3: This Resolution shall take effect immediately upon its adoption.

13 ADOPTED by the City Council this 17th day of December, 2024.

14
15 
16 PATRICIA LOCK DAWSON
17 Mayor of the City of Riverside

18 Attest:

19 

20 DONESIA GAUSE
21 City Clerk of the City of Riverside

22 //

23 //

1 I, Donesia Gause, City Clerk of the City of Riverside, California, hereby certify that the
2 foregoing resolution was duly and regularly adopted at a meeting of the City Council of said City at
3 its meeting held on the 17th day of December, 2024, by the following vote, to wit:

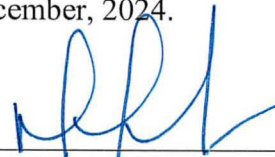
4 Ayes: Falcone, Robillard, Conder, Mill, Perry and Hemenway

5 Noes: Cervantes

6 Absent:

7 Abstain:

8 IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the
9 City of Riverside, California, this 20th day of December, 2024.

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11 _____
12 DONESIA GAUSE
13 City Clerk of the City of Riverside

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