

TECHNICAL MEMORANDUM

DATE: June 19, 2026
TO: Eva Covarrubias, County of Riverside
FROM: Alex So, Urban Crossroads, Inc.
JOB NO: 15352-02 VMT

SUBJECT: GALWAY DOWNS (CUP2303R1) VEHICLE MILES TRAVELED (VMT) ASSESSMENT

Urban Crossroads, Inc. has completed the following Vehicle Miles Traveled (VMT) Assessment for the Galway Downs (Project) located south of Los Caballos Road and between Los Corralitos Road and Pauba Road at 38801 Los Corralitos Road in unincorporated County of Riverside.

PROJECT OVERVIEW

Galway Downs is an existing events facility that first opened in the 1960s and has a current street address of 38801 Los Corralitos Road. The existing facility encompasses approximately 241.6 acres and operates as a traditional equestrian facility most of the time but also hosts a variety of other activities, primarily on weekends and holiday weekends.

The Project entails Revision No. 1 to CUP 02303 (CUP 02303R1), a Change of Zone (CZ 22000010), and Exception No. 9 to Riverside County Noise Ordinance No. 847 (hereafter "Project"). New structures and uses that would be constructed, installed, or permitted on the site include a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar canopy structure, and additional area for equestrian recreational vehicle (RV) park use. Additionally, areas are proposed where up to 36 park model lodging units could be placed in the future and where 18 additional employee modular housing units could be placed in the future.

A Project site plan can be found in Attachment A.

ANALYSIS METHODOLOGY

The California Environmental Quality Act (CEQA) requires all lead agencies to adopt VMT as the measure for identifying transportation impacts for land use projects. To comply with CEQA, the Governor's Office of Land Use and Climate Innovation (LCI) published the Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018. Statewide application of the new guidelines went into effect on July 1, 2020. The County of Riverside adopted VMT baselines and thresholds of significance based on the OPR's Guidelines on December 2020.

While the LCI Technical Advisory provides examples for evaluating VMT, they are not exhaustive and do not specifically address all land uses beyond residential, office, and retail. Instead, they allow flexibility in methodology and encourage the use of the best available data and tools, including travel demand models, sketch or spreadsheet models, and big data sources. LCI further notes:

Travel demand models, sketch models, spreadsheet models, research, and data can all be used to calculate and estimate VMT. To the extent possible, lead agencies should choose models that have sensitivity to features of the project that affect VMT. Those tools and resources can also assist in establishing thresholds of significance and estimating VMT reduction attributable to mitigation measures and project alternatives. When using models and tools for those various purposes, agencies should use comparable data and methods, in order to set up an “apples-to-apples” comparison between thresholds, VMT estimates, and VMT mitigation estimates.

For the Galway Downs Project reliance on the Riverside County Transportation Model (RIVCOM) travel demand model was determined to be inappropriate because Galway Downs’ extended market area and event-driven activities are not well represented by the model’s underlying land use assumptions. Instead, an alternative methodology was developed using both existing customer travel data and StreetLight™ big data. Specifically, the Project Applicant collected historical data documenting the number of vehicles that accessed the site during each operational day in 2023. This dataset establishes the Project’s baseline trip generation and provides a direct record of existing travel activity associated with equestrian operations as well as with non-equine events.

In parallel, StreetLight™ data was used to determine trip length distributions for trips generated by the Project. Unlike regional models, StreetLight™ relies on anonymized GPS and mobile device data, which captures actual travel patterns to and from the Galway Downs facility. By combining the Project’s trip generation data with empirically observed trip lengths, the analysis ensures that VMT estimates are grounded in real-world conditions. This approach is consistent with CEQA and Riverside County guidance, which recognize that unique recreational and sports venue projects may require the use of alternative data sources when models do not adequately capture project-specific travel behavior. Accordingly, the methodology provides a more accurate, context-sensitive, and defensible basis for evaluating the Project’s potential VMT impacts.

SIGNIFICANCE THRESHOLD

Establishing a significance threshold based on a net increase in VMT means that any scenario in which the Project generates more total VMT than the existing baseline would be considered to result in a significant impact. This approach is consistent with CEQA practice because it evaluates whether the Project adds to overall VMT compared to the baseline conditions, rather than relying solely on per-capita or regional averages that may not capture localized changes. The methodology also aligns with the County of Riverside Transportation Analysis Guidelines, which specifically recognize that recreational and sports venue projects can create unique travel patterns and should be assessed on the basis of total VMT. By applying a net increase threshold, the analysis provides a conservative and defensible framework for disclosing the additional travel demand associated with both the No Project (Existing Baseline Conditions) and With Project (Proposed Project) scenario. Accordingly, a net increase in the With Project VMT scenario would result in a significant VMT impact.

ABOUT STREETLIGHT DATA¹

StreetLight is a software program that gets its data from anonymous location information collected through smartphones, navigation apps, connected vehicles, and commercial fleets. These signals show where and when devices are moving, but they do not identify individual people. StreetLight

¹ StreetLight Insight Truck Volume Methodology and Validation (April 2025).

processes billions of these data points to figure out travel patterns, such as where trips start and end, the routes people take, and whether the travel is by car, truck, bike, or walking. To make sure the information is accurate, StreetLight compares its results to real traffic counts from sensors and state transportation records, then adjusts the data to match actual conditions. In simple terms, StreetLight turns anonymous signals from phones and vehicles into a clear picture of how people and goods move around, which planners can then use to understand traffic and transportation impacts.

Building on this general framework, StreetLight applies more detailed technical methods to estimate activity and validate its results. StreetLight Data's Volume Metrics are based on five linked machine-learning models that estimate vehicle volume and trip length by vehicle class and total vehicles. StreetLight Data provides vehicle volume information from 2019 through 2025. To support volume estimates over the range of time periods, StreetLight Data applies the Monthly Average Daily Trip (MADT) to the days or parts of the day required for a particular analysis. In the scaling process, StreetLight factors the ratio between sample trip counts for particular hours, days, and trip counts for the entire month with the volume for corresponding hours, day type, and MADT for that zone. The estimated vehicle volume is compared to the actual volume reported by permanent traffic counters to validate model results. The permanent counter data comes from the Federal Highway Administration (FHWA) Travel Monitoring Analysis System (TMAS) CLS (vehicle classification) dataset, which includes traffic counts from more than 3,000 unique sites. This data was utilized for the purpose of further refining the probable travel lengths of customers and employees.

SURVEY AREA

For the proposed Project, the Project site itself was used to capture travel behavior associated with existing baseline conditions. Galway Downs functions as a regional destination, drawing visitors from a wide geographic area and primarily generating trips during evenings and weekends, when conventional commute-based models are not representative. Travel to this type of facility is event-driven, discretionary, and characterized by longer average trip lengths than those associated with typical daily land uses. By selecting Galway Downs as the survey zone, the VMT analysis is grounded in real-world conditions at the actual venue, ensuring that observed data reflects the full range of trip patterns expected with the Project. This approach provides a more reliable basis for evaluating VMT impacts than reliance on generalized assumptions from regional travel demand models for this unique land use.

TRIP LENGTH

Utilizing the above parameters, average daily zone traffic, average trip length, and distance bins² of per-trip length in miles were obtained from StreetLight Data.

Table 1 presents data based on traffic monitoring collected over the 12-month period of January 2024 through December 2024 from StreetLight Data. This timeframe was selected because it represents the most recent complete annualized dataset available at the time environmental analysis for the Project commenced. The 2025 rolling 12-month dataset was not yet a full calendar year and therefore was not considered a complete annualization, while a full 2023 dataset was not

² Distance bins were defaulted to: 0-1, 1-2, 2-5, 5-10, 10-20, 20-30, 30-40, 40-50, 50-60, 60-70, 70-80, 80-90, 90-100, and 100+ in miles.

available from StreetLight at the time of analysis. Accordingly, the 2024 calendar year data provides the best available and most reliable basis for estimating baseline vehicle miles traveled conditions. The average weekday trip length of all vehicles is 30.5 miles, and the average weekend trip length of all vehicles is 39.2 miles.

TABLE 1: PROJECT AVERAGE TRIP LENGTH

	Weekday	Weekend
Project Site	30.5 mi	39.2 mi

BASELINE VEHICLE TRIPS AND VMT

Galway Downs is a multi-faceted events facility that functions primarily as a traditional equestrian facility during the week but also hosts a variety of other activities, primarily on weekends and holiday weekends.

For VMT analysis purposes, the Project is evaluated based on the change in operational activity levels rather than on the precise locations of future attendees or employees. To establish an appropriate baseline, data was collected by the Project Applicant in 2023 to document the number of vehicles accessing the site on each operational day over the full calendar year. These observed counts provide a representative measure of travel activity associated with the facility in the baseline condition.

According to the 2023 data, and as reflected in Table 2, peak weekdays occurred on five occasions (April 21, April 28, June 2, June 9, and May 26, 2023), with approximately 4,458 two-way vehicle trips per day. The peak weekend day occurred on May 28, 2023, with approximately 11,514 two-way vehicle trips.

TABLE 2: BASELINE CONDITIONS PEAK DAILY TRIPS

Category	Peak Daily Vehicle Trips
Weekdays (Mon-Fri)	4,458
Weekends (Sat-Sun)	11,514

Using the full dataset collected by the Project Applicant in 2023 to document the number of vehicles accessing the site on each operational day over the full 2023 calendar year, Table 3 shows the average number of daily weekday trips and average number of daily weekend trips. These observed counts provide a representative measure of VMT in the baseline condition.

TABLE 3: EXISTING CONDITIONS VMT

Baseline Conditions	Vehicle Trips	Trip Length	Daily VMT	Days/Year	Annual VMT
Weekday Average (Mon-Fri)	632	30.5 mi	19,276	261	5,031,036
Weekends Average (Sat-Sun)	2,500	39.2 mi	98,000	104	10,192,000
TOTAL VMT					15,223,036

VMT ANALYSIS

The proposed Project's VMT increase is based on the net new vehicle trips associated with the Project. Mobile source trip generation was estimated based on the net new vehicle trips associated with the Project. The Project's peak weekend day trip generation, with traffic control, was obtained from Table 4-4 of the Galway Downs (CUP02303R1) (TS2300001) Traffic Analysis and annualized assuming 104 peak event weekend days per year. This results in 1,197,456 projected annual two-way weekend trips based on 11,514 two-way trips per peak weekend day multiplied by 104 weekend days.

Existing condition annual weekend trips were derived from available data on existing daily trip generation that occurred in 2023 and totaled 359,238 annual two-way weekend trips. The difference between the Project's annualized peak weekend trip generation and existing condition annual weekend trips results in 838,218 net new annual two-way weekend trips. The average weekend trip length applied to these net new trips, 39.2 miles per trip, was derived from available StreetLight data. Weekday trip generation is unchanged from existing conditions and therefore no change in weekday VMT is anticipated.

Based on this calculation, Project-related vehicle trips would result in approximately 32,857,946 net new annual VMT. Table 4 provides an estimate of annual VMT for the Proposed Project based on baseline annual VMT and the net new annual vehicle trips associated with the Proposed Project. The resulting values conservatively represent the Project-generated total VMT under the Proposed Project. It should be emphasized that the total VMT values presented in Table 4 assume a peak event every weekend of the year, which is not anticipated to occur, and thus overstates the Project's anticipated VMT since Galway Downs would not realistically host a peak event every weekend of the year.

TABLE 4: PROPOSED PROJECT VMT

Proposed Project	Baseline Annual VMT	Net New Annual Vehicle Trips	Trip Length	Additional Annual VMT	Proposed Project Total VMT
Weekdays (Mon-Fri)	5,031,036	0	30.5 mi	0	5,031,036
Weekends (Sat-Sun)	10,192,000	838,218	39.2 mi	32,857,946	43,049,946
TOTAL VMT	15,223,036			32,857,946	48,080,982

As shown in Table 4, the Proposed Project is estimated to generate substantially higher VMT compared to Baseline Conditions, with total VMT increasing from 15,223,036 to 48,080,982. This increase exceeds the County's established VMT significance threshold, indicating that the Project would result in a significant transportation impact.

POTENTIAL MITIGATION STRATEGIES

Because the Project is located in a rural setting where traditional urban-focused transit and active transportation strategies may have limited applicability, potential approaches to reduce project-generated VMT are more appropriately focused on event management, shared travel, and visitor coordination. The CAPCOA (2024) Handbook for Analyzing Greenhouse Gas and Transportation

Impacts provides a menu of measures that could be considered to help reduce the Project's VMT. For this unique Project type, examples may include:

- **Shuttle and Charter Bus Programs (T-11, T-14):** Coordinate charter bus or shuttle services from major population centers, park-and-ride lots, or regional transit stations during high-attendance events to reduce the number of individual vehicles traveling long distances to the site.
- **Event Travel Demand Management (T-23, T-25):** Structure event scheduling to spread arrivals/departures across multiple time periods, and provide incentives for guests to pre-arrange carpools or group travel.
- **Rideshare /Transportation Network Company (TNC) Coordination (T-7, T-8):** Establish designated staging areas for rideshare vehicles (Uber, Lyft, etc.), minimizing on-site congestion and supporting shared trips from nearby towns.
- **Parking Management (T-19, T-21):** Implement preferential parking for carpools/vanpools or explore variable pricing for premium parking areas to encourage shared vehicle use.
- **Visitor Communication (T-27):** Provide advanced trip planning tools, online event information, and wayfinding that emphasize coordinated travel (e.g., rideshare options, carpool forums, shuttle schedules).

While the identified CAPCOA (2024) measures could help reduce single-occupant vehicle trips through strategies such as shuttles, carpools, rideshare coordination, parking management, and event scheduling, their overall effectiveness in a rural/suburban setting is inherently limited. These strategies are voluntary in nature and depend on event-goer participation, which cannot be guaranteed.

Based on published CAPCOA ranges and reasonable expectations for this type of facility, a reduction in the range of approximately 3 to 12 percent of total Project VMT could potentially be achieved, with a more typical outcome likely closer to 5 to 7 percent. Even at the upper end of this range, the Project's total VMT would remain above the significance threshold because the Project would continue to result in a net increase in total VMT compared to baseline conditions.

Given the site's location, reliance on long-distance auto travel, and absence of nearby transit or higher-density land uses, these measures would not be expected to reduce project-generated VMT to a level below the County's established significance threshold. As such, even with the consideration of CAPCOA (2024) strategies, the Project's transportation impact related to VMT would remain significant and unavoidable.

If you have any questions, please contact me directly at aso@urbanxroads.com.

ATTACHMENT A
PROJECT SITE PLAN

