

Central Avenue Commercial Retail Vehicle Miles Traveled (VMT) Analysis

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1.0 PROJECT INTRODUCTION

The purpose of this report is to evaluate the project's VMT analysis requirements and compliance with Senate Bill 743 (SB 743) and The California Environmental Quality Act (CEQA).

1.1 PROJECT DESCRIPTION

The project is located on the vacant lot at the T-intersection of Central Avenue (CA-74) and Allan Street in the County of Riverside. The project is designated as a greenfield development as the existing land is currently vacant/undeveloped. The proposed project is an approximately 12,000 square foot retail/business park comprised of three (3) buildings:

- Building "A" is approximately 4,050 square feet and proposed as retail.
- Building "B" is approximately 3,525 square feet and proposed as retail/fast-food with drive through.
- Building "C" is approximately 4,425 square feet and proposed as retail/office.

Figure 1-1 shows the Project site plan.

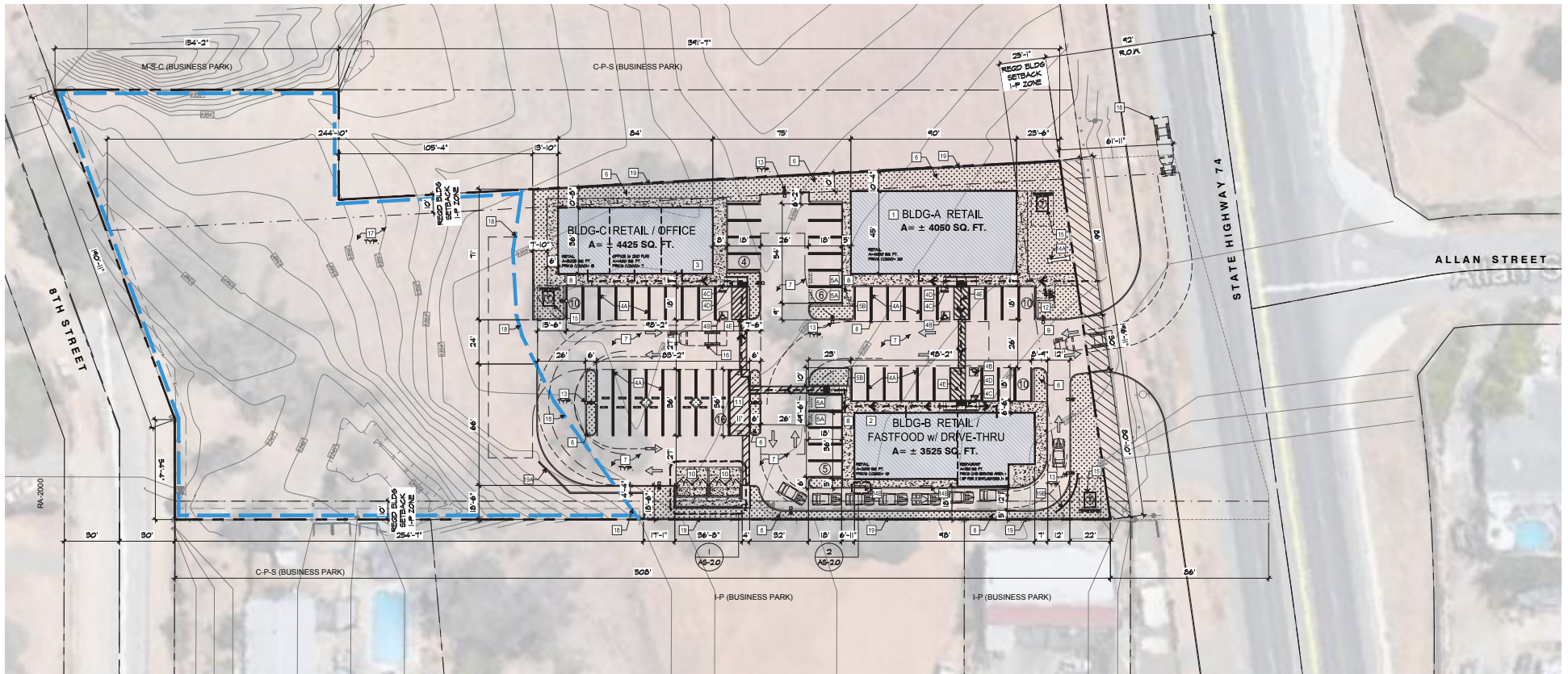
1.2 SENATE BILL 743

On September 27, 2013, SB 743 was signed into State law and started a process intended to fundamentally change transportation impact analysis as part of the CEQA compliance. The California Natural Resource Agency updated the CEQA transportation analysis guidelines in 2018. In this update automobile delay and LOS metrics are no longer to be used in determining transportation impacts. Instead VMT metrics will serve as the basis in determining impacts. Furthermore, the guidelines stated that after July 1, 2020, transportation analysis under CEQA must use VMT to determine impacts for land use projects.

1.3 GUIDANCE DOCUMENTS

The project is within the jurisdiction of the County of Riverside. The County has adopted guidance on evaluating VMT for transportation impacts under CEQA. For this project the County of Riverside's, "Transportation Analysis Guidelines for Level of Service, Vehicle Miles Traveled", December 2020¹, hereafter referred to as Guidelines.

¹ <https://rctlma.org/Portals/7/2020-12-15%20-%20Transportation%20Analysis%20Guidelines.pdf>



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Central Avenue Commercial Retails
Project Site Plan
Figure 1-1

2.0 ANALYSIS METHODOLOGY

The Guidelines adopted by Riverside County require a 5-step process² for VMT analysis:

1. **Project Screening:** Identifies if the project needs additional VMT analysis based on if the project meets screening criteria set by Riverside County. Projects that meet any criteria would have a presumption of less than significance.
2. **Identify VMT Measure:** If the project does not meet any screening criteria, the project will need to identify the appropriate VMT metric as identified in the Guidelines based on land use type.
3. **Identify VMT Threshold:** Based on the required VMT Measure the project will need to identify the appropriate VMT Measure threshold as required in the Guidelines.
4. **Assessment of Impact:** Project will need to evaluate its project specific VMT Measure against the appropriate VMT Threshold to determine if the project would have an CEQA transportation VMT impact.
5. **Mitigation Measures:** If the project would have a VMT impact under CEQA the project would need to mitigate the impact to the extent feasible and disclose whether the project would fully mitigate its impact or require additional analysis.

2.1 SCREENING CRITERIA

2.1.1 County of Riverside Transportation Analysis Guidelines Screening Criteria

The Guidelines recognize that certain projects based on type, location, size and other contexts could lead to a *presumption of less than significance* (i.e. the project's VMT would not cause a transportation impact) and would not need additional VMT analysis. The Guidelines provide the following screening criteria³:

1. *Small Projects:* This applies to projects with low trip generation per existing CEQA exemptions or based on the County Greenhouse Gas Emissions Screening Tables, result in a 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO_{2e}) per year screening level threshold."
2. *Projects Near High Quality Transit:* High quality transit provides a viable option for many to replace automobile trips with transit trips resulting in an overall reduction in VMT.
3. *Local Retail:* The introduction of new Local-serving retail has been determined to reduce VMT by shortening trips that will occur.
4. *Affordable Housing: Lower-income residents make fewer trips on average, resulting in lower VMT overall.*
5. *Local Essential Service:* As with Local-Serving Retail, the introduction of new Local Essential services shortens non-discretionary trips by putting those goods and services closer to residents.
6. *Map-Based Screening:* This method eliminates the need for complex analyses by allowing existing VMT data to serve as a basis for the screening smaller developments. Note that screening is limited to residential and office projects.
7. *Redevelopment Projects:* Projects with lower VMT than existing on-site uses, can under limited circumstances, be presumed to have a non-significant impact. In the event this

² Guidelines, Figure 2 VMT Analysis Flow Chart

³ Guidelines, Figure 3 Screening Criteria for Development Projects

screening does not apply, projects should be analyzed as though there is no existing uses on site (project analysis cannot take credit for existing VMT).

2.2 VMT ANALYSIS

Projects that do not meet any of the screening criteria identified would need to perform a VMT analysis per the Guidelines. The project would need evaluate the appropriate VMT metrics and compare them to thresholds to determine significance as defined by the Guidelines⁴.

2.2.1 VMT Measures

The Guidelines assign the appropriate VMT Measure for land use projects based on land use type. Residential and Office uses are required to use the relevant VMT efficiency metric, VMT per Capita or Work VMT per Employee respectively. Retail and similar uses are required to use a total VMT metric to measure the net change in VMT a project would create due to the “customer component” of the project.

2.3 VMT THRESHOLDS

Once a project identifies the appropriate VMT measures for the proposed land uses it would need to be compared to thresholds for those metrics to determine significance under CEQA. The County has chosen to base its thresholds on the county and county-wide averages.

The thresholds⁵ as defined by the Guidelines provides are as follows:

- Residential Projects: exceeding 15.2 VMT/Capita, based on the county-wide average.
- Office and Other Employment Projects: exceeding 14.9 Work VMT/Employee, based on the county-wide average.
- Retail and Other Customer Projects: An increase in total region wide (county) VMT.

3.0 PROJECT ANALYSIS

Although the project is primarily a retail project, there is a possibility for office related use as Building “C” is proposed to be either retail or office. Therefore, this project will be treated as a mixed-use project and will be analyzed on an individual basis for a conservative analysis.

3.1 EMPLOYMENT USE ASSESSMENT

3.1.1 Screening Criteria Assessment

As stated previously, only Building “C” could potentially contain an office use based on the current site plan. Building “C” is approximately 4,425 square feet of the 12,000 square feet project.

Screening Criteria Small Projects

Based on the Guidelines, General Office Buildings with an area less than or equal to 165,000 square feet would be presumed to cause a less-than-significant impact, the project would

⁴ Guidelines, Figure 4 Threshold Basisskjf

⁵ Guidelines, Figure 6 VMT Threshold of Significance

potentially have 4,425 square feet of office. **The project’s employment component does qualify for the small project screening.**

3.1.2 VMT Analysis

As described in Section 3.3.1, the project’s employment component would qualify for screening for being a small project. **For this reason, the project’s employment component would be presumed to be less than significant for VMT impacts.**

3.2 RETAIL USE ASSESSMENT

3.2.1 Screening Criteria Assessment

The project proposes a 12,000 square feet shopping, this part of the analysis assumes the entire 12,000 square feet would be retail.

Screening Criteria Small Projects

Based on the Guidelines, Retail buildings with area less than or equal to 60,000 square feet would be presumed to cause a less-than-significant impact, the project would potentially have a total of 12,000 square feet of retail. **The project’s retail component does qualify for the small project screening.**

Screening Criteria Local-Serving Retail

The proposed retail would not only serve the other uses on the site but the local community as well. The guidelines state that to be considered local-retail, no single store on-site exceeds 50,000 square feet. As stated previously, the entire project site provides 12,000 square feet of space in three buildings that are considered local retail. **The project’s retail component could qualify for the Local-Serving Retail screening.**

3.2.2 VMT Analysis

As shown in Table 1, the project’s retail component would qualify for screening for being a small project. **For this reason, the project’s retail component would be presumed to be less than significant for VMT impacts.**

3.3 VMT IMPACT ASSESSMENT AND CONCLUSION

The proposed project is presumed to be less than significant for VMT impacts due to all the proposed uses meeting at least one of the County’s screening criteria outlined in Section 2.1. The project’s VMT impact assessment for the proposed uses is summarized in Table 1:

Table 1: Summary of VMT Impacts

Land Use Type	Proposed Uses	Impact	Commentary
Employment	Office 4.4 KSF	Presumed to be less than significant	Meets County’s Screening Criteria for Small Projects
Retail	Retail 12 KSF Shopping Center	Presumed to be less than significant	Meets County’s Screening Criteria for Small Projects and Local-Serving Retail.