



TECHNICAL MEMORANDUM

TO: For applicant submittal to COUNTY OF RIVERSIDE

FROM: Perrie Ilercil, Senior Engineer | GANDDINI GROUP, INC.

DATE: November 28, 2023

SUBJECT: Sun Grown Farms Cannabis Cultivation and Processing Facility Project (CUP 190046)
Transportation Screening Assessment
GGI Project No. 19645

Ganddini Group, Inc. is pleased to provide this Transportation Screening Assessment for the proposed Sun Grown Farms Cannabis Cultivation and Processing Facility project in the County of Riverside. The purpose of this screening assessment is to determine if the preparation of a traffic impact analysis with level of service (LOS) analysis or vehicle miles traveled (VMT) analysis is necessary based on the transportation study guidelines and screening criteria established by the County of Riverside. We trust the findings of this analysis will aid the County of Riverside in assessing the project.

PROJECT DESCRIPTION

The 9.85-acre project site (APN: 915-330-040) is located at 38455 East Benton Road in the County of Riverside, California. The project site is currently developed with one single-family residence (to remain) and zoned Rural Residential (RR – 1DU/5AC).

The proposed project involves development of 5.05 acres as Light Agricultural (A-1-10) land use for commercial cannabis cultivation and processing facilities totaling 19,360 square feet, including four (4) 2,800 square foot greenhouses, a 1,600 square foot processing area, two (2) 2,800 square foot cultivation buildings with a break room, two (2) 320 square foot cargo containers adjacent to the cultivation buildings. Related on-site improvements include four (4) fire water tanks, a new septic system, fencing and employee parking. The existing single-family residence will remain unmodified. The project will donate the eastern portion of the property (4.85-acre) for conservation to the Regional Conservation Authority. Vehicular access to the project site is proposed via one new driveway on Benton Road. The proposed site plan is shown in Attachment A.

PROJECT TRIP GENERATION

Table 1 shows the project trip generation forecast based on rates obtained from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition, 2021). Based on review of the ITE land use description, trip generation rates for ITE Land Use Code 190 (Marijuana Cultivation and Processing Facility) were determined to adequately represent the land use for the proposed project and were selected for calculation of the project trip generation forecast.

As shown in Table 1, the proposed project is forecast to generate approximately 80 daily trips, including 13 trips during the AM peak hour and 12 trips during the PM peak hour.

CRITERIA FOR THE PREPARATION OF TRAFFIC IMPACT ANALYSES

The project has been screened for both level of service (LOS) analysis and vehicle miles traveled (VMT) analysis using the established criteria as specified in the County of Riverside *Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled* (December 2020) ["County TA Guidelines"].

Level of Service (LOS) Analysis Exemption

As specified in Appendix B of the County TA Guidelines, the following types of development proposals are generally exempt from the requirement to prepare a LOS transportation impact analysis:

- All Residential Parcel Maps.
- Single Family Residential Tracts of less than 100 lots.
- Apartments and other Multiple Family projects of less than 150 units.
- Plot Plan and Uses Cases for projects of one acre or less.
- Preschools, Elementary Schools, and Middle Schools.
- Churches, Lodges, Community Centers, Neighborhood Parks, and Community Parks.
- Mini Storage Yards
- Congregate Care Facilities that contain significant special services, such as medical, dining, recreation, and support retail facilities.
- Level 1 projects (100-200 peak hour trips) in areas where a comprehensive traffic analysis has been performed and road improvement infrastructure funding mechanisms are in place. The Transportation Department may, however, require a traffic analysis for projects that are anticipated to exhibit potential adverse deficiencies in the circulation system.
- Any use which can demonstrate, based on the most recent edition of the Trip Generation Report published by the Institute of Transportation Engineers (ITE) or other approved trip generation data, trip generation of less than 100 vehicle trips during peak hours.

These exemptions will apply in most cases; however, the County reserves the right to require a traffic analysis for any existing safety or environmental concern at the site or nearby intersections.

The proposed project is forecast to generate fewer than 100 trips during the weekday AM and PM peak hours. Assuming the project shall construct all on-site and off-site improvements (if any) following County design standards, the project would not create any new safety or operational concerns. Therefore, the proposed project does not warrant the preparation of a transportation impact study with LOS analysis based on the County-established screening criteria and LOS impacts may be presumed to be negligible.

Vehicle Miles Traveled (VMT) Screening Criteria (CEQA)

The County TA Guidelines were developed based on guidance from the Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (State of California, December 2018) ["OPR Technical Advisory"]. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. The OPR Technical Advisory provides technical considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT.

The County TA Guidelines identify screening criteria for certain types of projects that typically reduce VMT

and may be presumed to result in a less than significant VMT impact. To qualify for VMT screening, the project need only satisfy one of the following screening criteria:

- Small Projects (generate less greenhouse gas emissions¹ or daily vehicle trips² than threshold criteria)
- Projects near High Quality Transit³
- Local Servicing Retail⁴
- Affordable Housing
- Local Essential Service⁵
- Map Based Screening⁶
- Redevelopment Projects

Small Projects

The County TA Guidelines Appendix G includes screening criteria for small projects with low trip generation per existing CEQA exemptions or projects with less than significant emissions impacts. The County greenhouse gas (GHG) emissions screening identifies projects that result in less than the 3,000 metric ton of carbon-dioxide equivalents per year (MTCO₂e/year) screening threshold. The California Emissions Estimator Model (CalEEMod) to determine the maximum number of dwelling units or square footage for a variety of land uses that would remain within the 3,000 MTCO₂e/year threshold established by the South Coast Air Quality Management Districts (SCAQMD). Based on this methodology the County recommends the following “small projects” that may be presumed to result in a less than significant VMT impact:

- Projects generating less than 110 daily vehicle trips (ADT)
- Projects generating less than 3,000 MTCO₂e/year
 - 110 single-family residential dwelling units
 - 147 multi-family residential dwelling units (low-rise)
 - 194 multi-family residential dwelling units (mid-rise)
 - 165,000 square feet of general office
 - 60,000 square feet of retail
 - 208,000 square feet of warehousing (unrefrigerated)
 - 179,000 square feet of general light industrial

¹ The South Coast Air Quality Management District (SCAQMD) threshold of greenhouse gas (GHG) emissions (3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO₂e) per year) may be presumed to result in a less than significant VMT impact.

² As noted in OPR Technical Advisory, 110 daily vehicle trips may be presumed to result in a less than significant VMT Impact. Additionally, the term vehicle refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty trucks should only be included in a traffic impact analysis for modeling convenience and ease of calculation (e.g., where data provided combine auto and heavy freight VMT) (CEQA Guidelines, § 15064.3, subd. (a)). Therefore, heavy-duty trucks should not contribute to a finding of significant traffic (VMT) impact.

³ A major transit stop is defined as an existing rail transit station, ferry terminal with bus or rail service, or the intersection of two or more major bus routes with less than 15-minute headways during the peak commute hours (Pub. Resources Code, § 21064.3.).

⁴ New local servicing retail reduces VMT by shortening trips to retail services. Projects are presumed to be less than significant when no single store on-site exceeds 50,000 square feet.

⁵ New local essential servicing shortens non-discretionary trips by putting services closer to the residents resulting in an overall reduction in VMT. Essential services include daycare, emergency services, medical care, governmental offices/service, and parks.

⁶ The WRCOG VMT Screening Tool was developed from the Riverside Transportation Analysis Model (RIVTAM) travel forecasting model to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs).

Project Assessment

The proposed project is forecast to generate less than 110 daily trips; therefore, the proposed project satisfies the County-established small project screening criteria and may be presumed to result in a less than significant VMT impact.

CONCLUSIONS

The proposed project is forecast to generate approximately 80 daily trips, including 13 trips during the AM peak hour and 12 trips during the PM peak hour.

The proposed project does not warrant the preparation of a transportation impact study with LOS analysis based on the County-established screening criteria and LOS impacts may be presumed to be negligible.

The proposed project satisfies the County-established VMT screening criteria for small project screening and may be presumed to result in a less than significant VMT impact.

It has been a pleasure to assist you with this project. Should you have any questions or comments, please contact Perrie Ilercil at (714) 795-3100 x 103 or perrie@ganddini.com.

Table 1
Project Trip Generation

Trip Generation Rates									
Land Use	Source ¹	Land Use Variable ²	AM Peak Hour			PM Peak Hour			Daily Rate ³
			% In	% Out	Rate	% In	% Out	Rate	
Marijuana Cultivation and Processing Facility	ITE 190	TSF	93%	7%	0.69	28%	72%	0.64	4.11

Trips Generated									
Land Use	Source	Quantity	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Marijuana Cultivation and Processing Facility	ITE 190	19,360 TSF	12	1	13	3	9	12	80

Notes:

1. ITE = Institute of Transportation Engineers *Trip Generation Manual* (11th Edition, 2021); ### = Land Use Code.
All rates based on General Urban/Suburban setting.
2. TSF = Thousand Square Feet.
3. In the absence of a daily rate for ITE 190 (Marijuana Cultivation and Processing), the ratio of the daily rate to the PM rate for ITE 140 (Manufacturing) was used to determine the daily rate from the ITE 190 (Marijuana Cultivation and Processing) PM rate.

ATTACHMENT A

SITE PLAN

