To:	City of San Jacinto
From:	Jordan Mower, Alex Garber; EPD Solutions, Inc.
Date:	June 24, 2026
Site:	980 West 7th Street, San Jacinto, CA
Subject:	Vehicle Miles Traveled (VMT) Screening Analysis Bradley Gardens – EPD Project No. 26-017

This technical memorandum evaluates the proposed Project located at 980 West 7th Street in the City of San Jacinto. The purpose of this analysis is to determine whether a vehicle miles traveled (VMT) analysis would be required for the Project. This memo evaluates the Project using the City of San Jacinto's *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (June 2020).

Project Description

The Project site is within the southwestern portion of the City of San Jacinto in Riverside County, California. The Project site is located at 980 West (W.) 7th Street, at the southeast corner of the intersection of W. 7th Street and South (S.) Grand Avenue. Regional access to the Project site is provided by State Route (SR) 79 and SR 74. Local access to the site is provided by W. 7th Street and S. Grand Avenue. The Project site consists of one parcel encompassing approximately 2.98 acres. The site is identified as Assessor's Parcel Number (APN) 435-330-003. The Project site is developed and currently operates as the Bradley Gardens facility, which offers a variety of psychiatric-focused care to patients with varying health needs, including supervised Psychiatric Health Facility (PHF) care beds, Skilled Nursing Facility (SNF) and Short-Term Psychiatric (STP) care beds, and rehabilitation and therapy programs.

The Project proposes the expansion of the existing Bradley Gardens Nursing Facility on the 2.98-acre site. The Project includes demolition of the existing 1,074-square-foot (SF) maintenance and storage building for the construction of a 18,000 SF building addition to the existing 44-bed SNF building that would provide 43 additional SNF and STP beds, resulting in a total capacity of 87 beds. The Project also proposes the conversion of the existing 2,596 SF vacant office building into a 16-bed PHF. The proposed Project would result in a floor area ratio (FAR) of 0.27. Additional improvements would include landscaping, utility connections, implementation of stormwater facilities, lighting, and pavement of parking areas and driveways. With the completion of the proposed Project, there would be a total of 103 beds (SNF, STP, and PHF beds) on the Project site. The Project site has an existing General Plan land use designation of Industrial (I) and is zoned as Industrial Light (IL).

The proposed Project site plan is shown in Figure 1. It should be noted that the Project site plan shows 17,372 SF for the 43-bed addition; this analysis utilized 18,000 SF for the 43-bed addition, presenting a conservative analysis.

Project Trip Generation

A trip generation analysis was prepared to determine the estimated change in site trip generation that would result from the proposed Project. The analysis used trip rates from the Institute of Transportation

Engineers (ITE) *Trip Generation Manual, 12th Edition*. The proposed Project was analyzed using ITE Land Use Code 620 – Nursing Home. As shown in Table 1, the existing 44- bed skilled nursing facility generates 135 daily trips, with 6 trips occurring during the AM peak hour and 10 trips occurring in the PM peak hour. The proposed Project's total trip generation with 103 total beds would be 315 daily trips, with 14 trips occurring during the AM peak hour and 23 trips occurring during the PM peak hour. The proposed Project would therefore generate 180 net daily trips, 8 net AM peak hour trips, and 13 net PM peak hour trips.

Figure 1: Proposed Project Site Plan

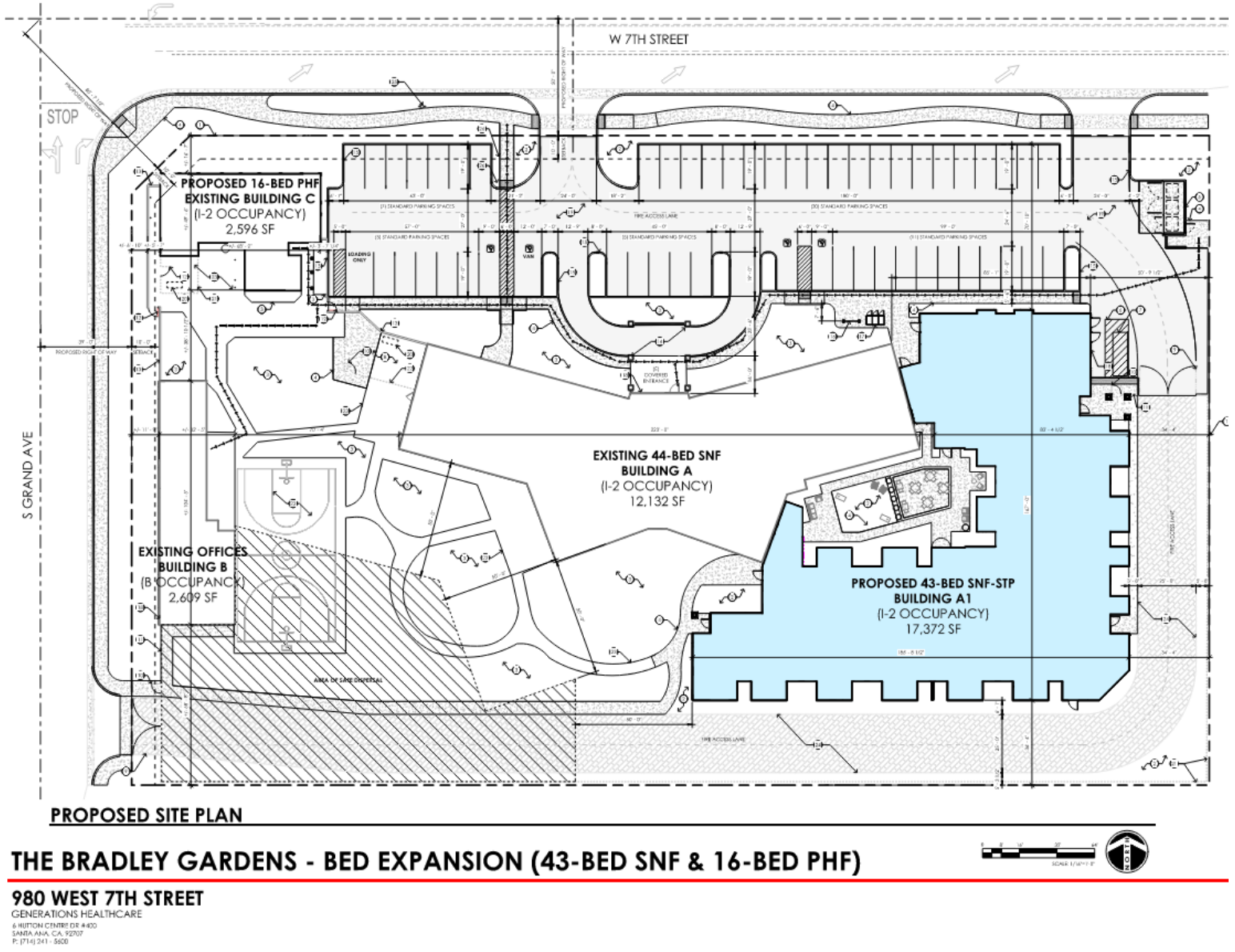


Table 1: Project Trip Generation

				AM Peak Hour			PM Peak Hour		
Land Use		**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Trip Rates									
620 Nursing Home[1]		Beds	3.06	0.1	0.04	0.14	0.07	0.15	0.22
Existing Trip Generation									
Nursing Home[1]	44	Beds	135	4	2	6	3	7	10
Proposed Project Total Trip Generation									
Nursing Home[1]	103	Beds	315	10	4	14	7	15	23
Total Project Trip Generation			**315**	**10**	**4**	**14**	**7**	**15**	**23**
Net Project Trip Generation			**180**	**6**	**2**	**8**	**4**	**8**	**13**

[1]Institute of Transportation Engineers, Trip Generation Manual, 12th Edition, 2025. Land Use Code 620 - Nursing Home (Average Rate)

Vehicle Miles Traveled (VMT) Background

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR; now the Governor's Office of Land Use and Climate Innovation) to amend the California Environmental Quality Act (CEQA) Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts, aiming to promote the reduction of greenhouse gas (GHG) 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.

City of San Jacinto VMT Screening

The City of San Jacinto's *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* provides the following three screening criteria for which projects can be presumed to have a less-than-significant impact related to VMT.

Transit Priority Area (TPA) Screening: Projects located within a TPA[1] may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. This presumption may NOT be appropriate if the project:

- Has a floor area ratio (FAR) of less than 0.75;
- Includes 5 percent or more parking for use by residents, customers, or employees of the project than required by the City;
- Is inconsistent with the applicable Sustainable Communities Strategy; or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

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 total daily VMT/SP that is less than the baseline level for the Western Riverside Council of Governments (WRCOG) subregion. 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 this screening criteria.

Project Type Screening: Local serving retail projects less than 150,000 square feet may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel.

[1] A Transit Priority Area (TPA) is defined as a half-mile radius around an existing major transit stop or an existing stop along a high-quality transit corridor per the definitions below.
Pub. Resources Code, § 21064.3 - 'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods.
Pub. Resources Code, § 21155 - For purposes of this section, a 'high-quality transit corridor' means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

In addition to local serving retail, the following uses can also be presumed to have a less-than-significant impact absent substantial evidence to the contrary as their uses are local serving in nature:

- Projects located in a Transit Priority Areas (TPA)
- Projects located in a low-VMT generating area
- Local-serving K-12 schools
- Local parks
- Day care centers
- Local-serving gas stations
- Local-serving banks
- Local-serving hotels (e.g. non-destination hotels)
- Student housing projects
- Local serving community colleges that are consistent with the assumptions noted in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- Projects generating less than 500 daily vehicle trips. This generally corresponds to the following "typical" development potentials:
    - 53 single family housing units
    - 68 multi-family, condominiums, or townhouse housing units
    - 150,000 square feet of local serving commercial
    - 100,000 square feet of office
    - 100,000 square feet of light industrial
    - 300,000 square feet of warehousing
    - 300,000 square feet of high cube transload and short-term storage warehouse

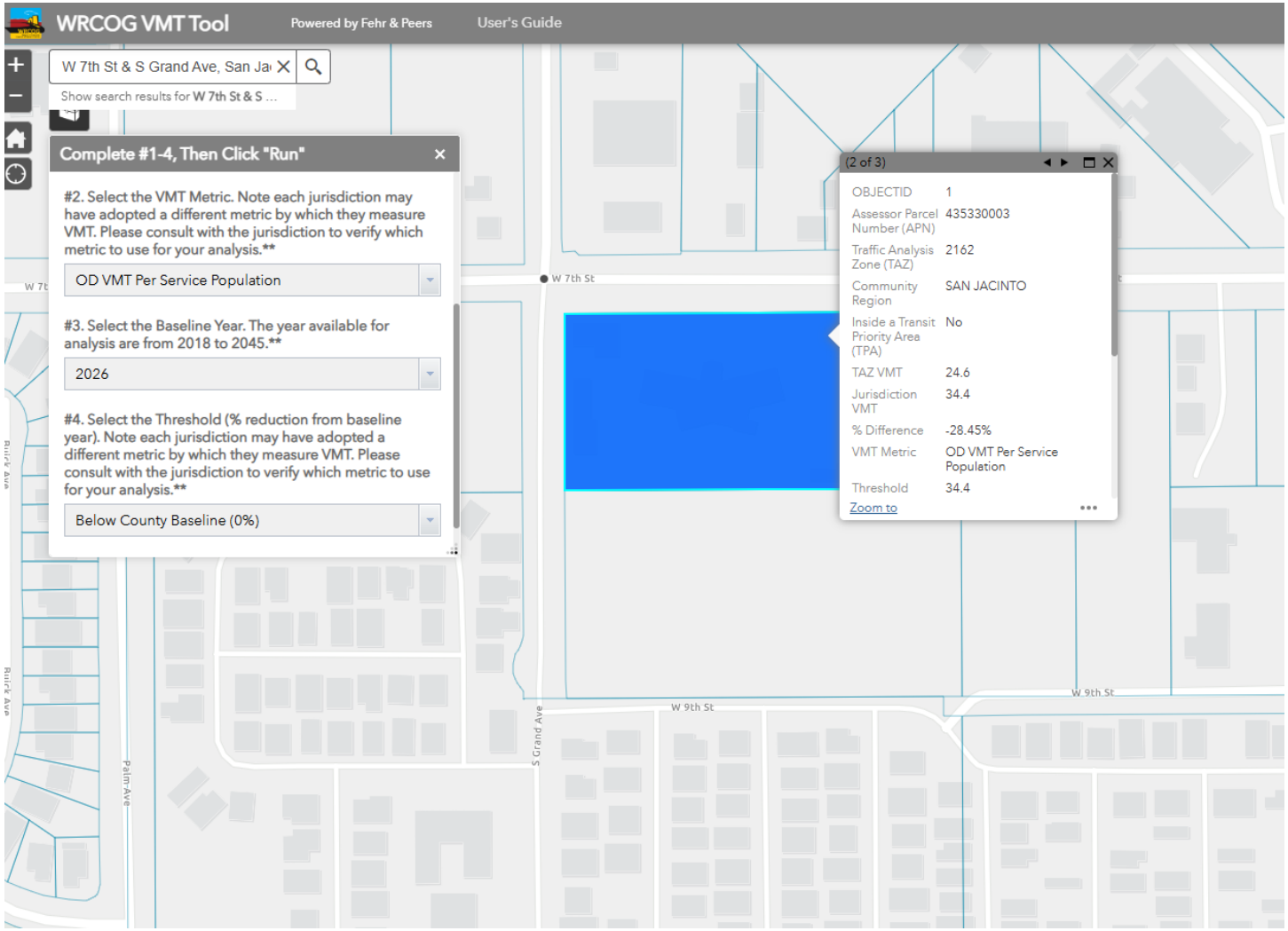
The applicability of each criterion to the Project is discussed below.

Screening Criterion 1 - Transit Priority Area (TPA) Screening: Per the City's VMT screening criteria, projects located within an existing TPA may be presumed to result in a less-than-significant VMT impact. As shown in Figure 2, *WRCOG VMT Tool Screening Results,* based on the WRCOG VMT Tool, the proposed Project is not located within an existing TPA. Therefore, the Project does not satisfy Screening Criterion 1.

Screening Criterion 2 – Low VMT Area Screening: Per the City's VMT screening criteria, projects that are consistent with the existing land use and are located within a low VMT area may be presumed to have a less-than-significant impact on VMT. The Project's proposed land use is not consistent with the General Plan; therefore, Screening Criterion 2 – Low VMT Area Screening is not applicable to the Project.

Screening Criterion 3 – Project Type Screening: According to the City's Guidelines, local serving projects and land uses may be presumed to have a less-than-significant VMT impact. Additionally, projects that are expected to generate 500 or fewer daily vehicle trips are presumed to have a less-than-significant VMT impact. The Project does not propose any local serving land uses. However, as shown in Table 1, the proposed Project is expected to generate 315 total daily vehicle trips, which is fewer than the 500 daily vehicle trip threshold provided in the City's Guidelines. Therefore, the Project satisfies Screening Criterion 3.

Figure 2: WRCOG VMT Tool Screening Results



Summary

The proposed Project satisfies Screening Criterion 3 (Project Type Screening) as the Project is expected to generate fewer than the 500 daily vehicle trip threshold provided in the City's Guidelines. Therefore, the Project is presumed to have a less-than-significant VMT impact, and no further analysis is required.

If you have any questions about this analysis, please contact us at (949) 796-1180 or techservices@epdsolutions.com