translutions, inc.
17632 Irvine Boulevard, Suite 200,
Tustin, California 92780
Phone (949)656-3131 Fax (949)445-3131
solutions@translutions.com

October 24, 2025

Ms. Lauren Sanchez, Project Architect
Loescher Meachem Architects, Inc.
353 S. Broadway, #300,
Los Angeles, CA 90013

Subject: Tumbleweed Sanctuary – Trip Generation and Vehicle Miles Traveled Analysis

Dear Lauren:

Translutions, Inc. (Translutions) is pleased to provide this letter discussing the trip generation and vehicle miles traveled (VMT) analysis for the proposed Tumbleweed Sanctuary. The proposed project is located at 57889 Pueblo Trail and includes Assessor's Parcel Numbers (APN) 058802121, 058802128, and 058802129 in the Town of Yucca Valley, California.

The Town of Yucca Valley has adopted the *Traffic Impact Analysis Guidelines* (June 2020) that includes guidance for a local traffic impact analysis using roadway and intersection performance and the California Environmental Quality Act (CEQA) analysis using Vehicle Miles Traveled (VMT). This analysis considers the City's Level of Service and CEQA VMT thresholds and methodologies to determine potential project impacts.

PROJECT DESCRIPTION

As stated earlier, the proposed project is located at 57889 Pueblo Trail and includes Assessor's Parcel Numbers (APN) 058802121, 058802128, and 058802129 in the Town of Yucca Valley, California. It should be noted that there are no proposed buildings or changes on APNs 058802128 and 058802129. Vehicular access to the project will be provided on Pueblo Trail with one driveway on the north side of Pueblo Trail and one driveway on the south side of Pueblo Trail. It should be noted that no new building structures are being proposed as part of the CUP. Figure 1A illustrates the site plan.

Tumbleweed Sanctuary proposes to develop as an event center and designed to accommodate gatherings of 100 guests. It could have the following events:

Weddings. Wedding ceremonies typically begin at sunset, with a 20–30-minute ceremony in one of our dedicated ceremony spaces. From there, the couple will take photos in the garden while guests gather on the front patio for a cocktail hour. All events are catered most often by a food truck. Around 7:30 or 8:00 PM the bridal party moves inside for music and dancing where amplified music is permitted. All weddings end at 10:00 PM. Tumbleweed Sanctuary will provide staffing for each wedding, including a Wedding Coordinator and 2 or 3 other staff members. Tumbleweed Sanctuary also aids with parking at arrival, and departure of guests.

Cultural and Community Events. Tumbleweed Sanctuary would like to accommodate health and wellness events, community events, retreats, conferences and other smaller scale events. It is anticipated that these types of events occurring in the shoulder season, with up to 50 events per year with up to 100 guests.

Other Events. Tumbleweed Sanctuary also anticipates other smaller events during the off-season. Events such as yoga retreats with up to 20 people, meditation retreats with up to 20 people, community food drives, etc. are anticipated.

TRIP GENERATION

Generally, trip generation is based on the Institute of Transportation Engineers' (ITE) *Trip Generation*. However, the ITE Trip Generation does not have trip generation rates for a project of this type. Therefore, the daily trip generation has been developed using the number of attendees and using an average vehicle occupancy (AVO) based on surveys conducted at an event center by Translutions in 2019 (before the COVID-19 pandemic). Based on the survey, the AVO was calculated at 3.06 persons/vehicle. Table A includes the survey data (all tables attached). For events such as weddings, the number of staff is generally calculated at 10 percent of the number of guests. However, for this analysis, up to 25 staff members and delivery trucks have been used for the analysis. A conservative AVO of 2.0 has been used for staff since event staff are likely to arrive with the food truck and event management group.

As discussed in the project description, events are likely to begin after sunset. Therefore, most of the trips will occur during the non-peak hours and the a.m. and p.m. peak hour trip generation are likely to be minimal. However, to present a conservative estimate, 10%

of the trips have been assumed for the a.m. peak hour and 20% of the trips have been assumed for the p.m. peak hour. The resulting daily trip generation is shown on Table B.

As shown in Table B, the proposed project is anticipated to generate 99 daily trips with 10 trips occurring during the a.m. peak hour and 20 trips occurring during the p.m. peak hour. Since events do not occur every day, the average trip generation will be substantially less.

The Town of Yucca Valley uses screening criteria and screens out development projects that generate less than 100 peak hour trips from a Level of Service (LOS) analysis. Based on the trip generation shown in Table B, the project is forecast to generate less than 50 trips during any peak hour. Therefore, a LOS analysis should not be required.

VEHICLE MILES TRAVELED (VMT) SCREENING ANALYSIS

The Town of Yucca Valley adopted VMT impact and screening threshold in 2020. The Town uses three screening criteria, and if any one criterion is met, the project is considered to have a less than significant impact. The Town's screening criteria are as follows:

1. **Transit Priority Area (TPA) Screening. Presumed less than significant VMT impact for projects located in TPAs.**
   The project is not located within a transit priority area. This screening criteria does not apply.
2. **Low VMT Area Screening. Presumed less than significant VMT impact for projects located in low VMT generating model traffic analysis zones (TAZs). These TAZs generate total daily Vehicle Miles Traveled/Service Population (VMT/SP) that is 15% less than the baseline level for the County.**
   Figure 2 shows the results of the Low VMT Area Screening conducted using the SBCTA VMT tool. As seen in Figure 2, the VMT for the project zone is 18.9 VMT/SP whereas the threshold is 27.8 VMT/SP. Therefore, the project is located in a low VMT area. Based on the Town's guidelines, the project screens out of a full VMT analysis and the project's impacts are considered to be less than significant.
3. **Project Type Screening. Local serving retail projects (Per OPR's Technical Advisory less than 50,000 square feet) and neighborhood schools are presumed to have a less than significant VMT impact. Projects that generate less than 110 daily trips do not require VMT analysis.**
   The project trip generation is anticipated to be 99 trips on event days. Therefore, the project screens out of a VMT analysis, and the project's impacts are considered to be less than significant.

CONCLUSION

The project is forecast to generate less than 100 vehicle trip-ends during the a.m. and p.m. peak hours. Therefore, a level of service analysis should not be required. Also, the project is located in a low VMT area and will generate less than 110 daily trips, and therefore, the project is considered to have a less than significant impact on VMT.

Should you have any questions, please don't hesitate to call me at (949) 656-3131.

Sincerely,

translutions, Inc.

Sandipan Bhattacharjee, P.E., T.E., AICP, ENV SP
Principal

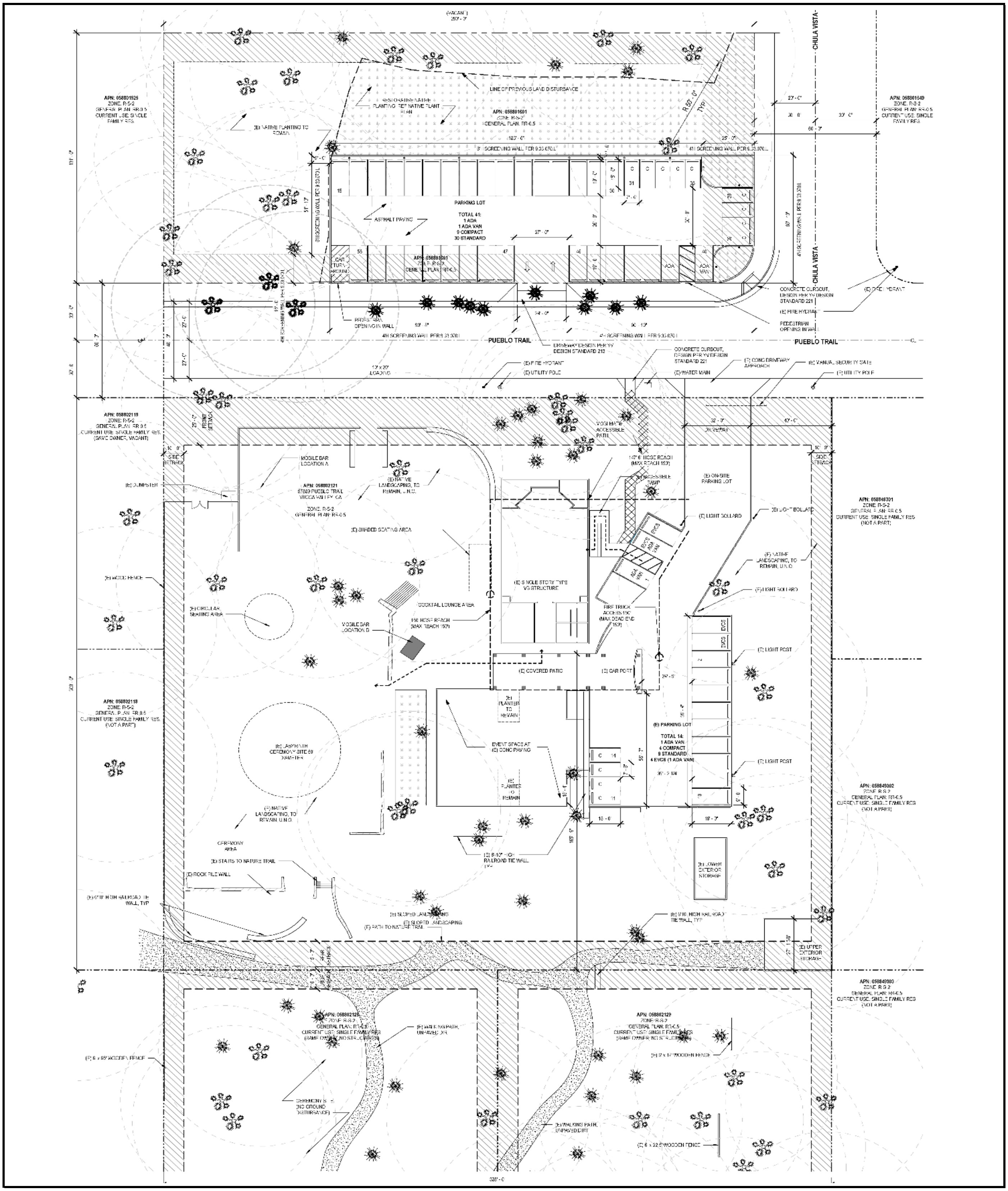

FIGURE 1
Tumbleweed Sanctuary
Site Plan

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Table A - Occupancy Survey at Seven4One Event Center

Vehicle Occupancy Survey	
Saturday, August 24, 2019	
Vehicle #	**Occupancy**
Vehicle 1	1
Vehicle 2	2
Vehicle 3	2
Vehicle 4	2
Vehicle 5	4
Vehicle 6	4
Vehicle 7	2
Vehicle 8	4
Vehicle 9	6
Vehicle 10	3
Vehicle 11	3
Vehicle 12	4
Vehicle 13	4
Saturday, August 31, 2019	
Vehicle #	**Occupancy**
Vehicle 1	4
Vehicle 2	2
Vehicle 3	2
Average Occupancy 8-24-19	**3.154**
Average Occupancy 8-31-19	**2.667**
Average Occupancy	**3.0625**

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Table B - Project Trip Generation

Land Use	Units	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total	Daily
Event Center								
Attendee Trips	100 Attendees	4	3	7	7	6	13	65
Staff/Vendor Trips	25 Staff	2	1	3	4	3	7	33
Total Trip Generation		6	4	10	11	9	20	99

Notes: DU = Dwelling Unit

[1] Trip generation based on number of attendees and staff considering the worst case of 100 attendees and 25 staff. An AVO of 3.06 has been used for attendees based on surveys conducted at a wedding venue in 2019.

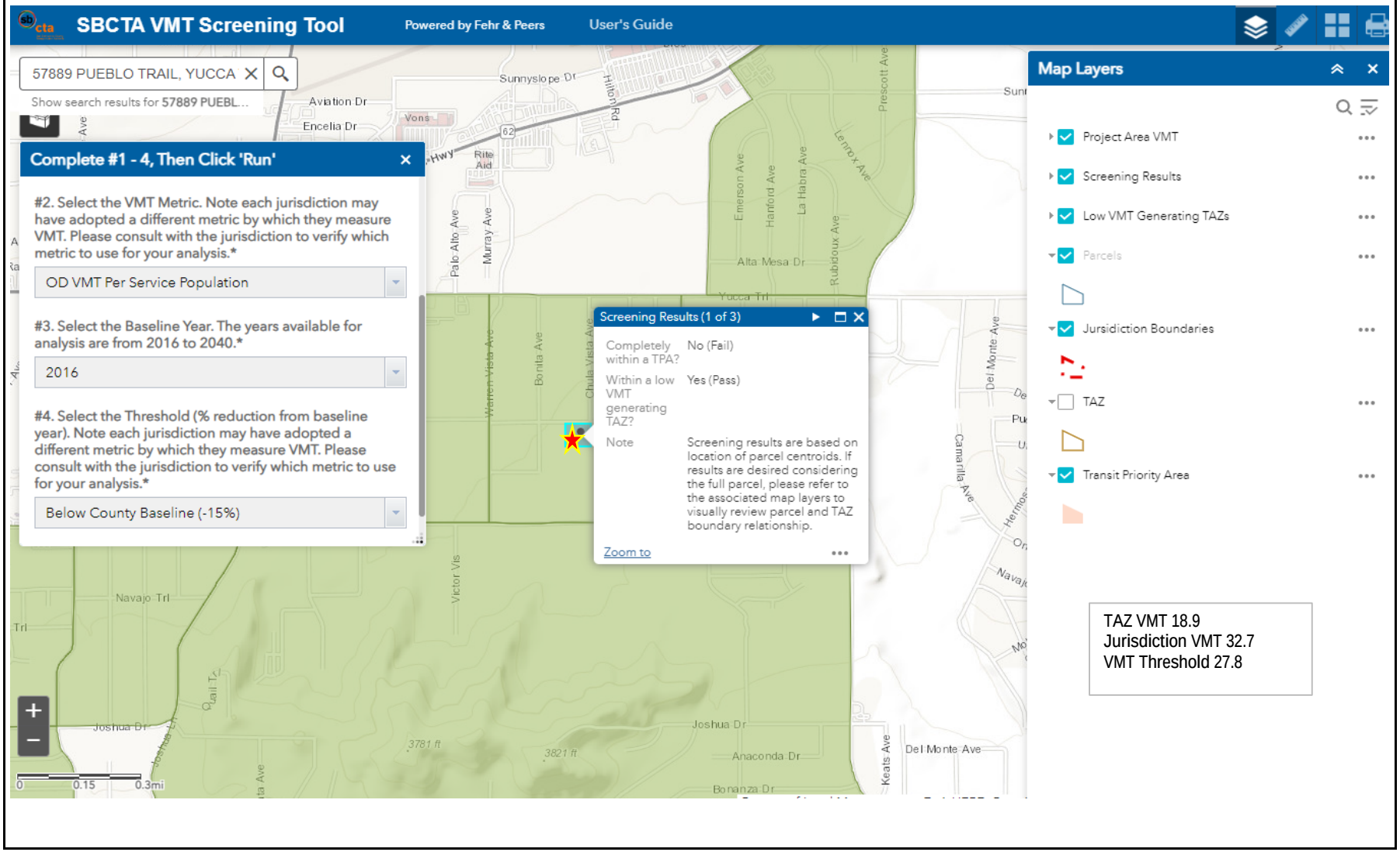

FIGURE 2

Project Location

Tumbleweed Sanctuary
VMT Screening - Low VMT Area Screening

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Town of Yucca Valley

Traffic Scope Approval Form

To be Completed by applicant consultant and approved by Public Works prior to start of study.

Project Tumbleweed Sanctuary

Name: Project Tumbleweed Sanctuary

Address: Project 57889 PUEBLO TRAIL, YUCCA VALLEY, CA 92284

Description: CUP TO ALLOW NON-RELIGIOUS ASSEMBLY RELATED TO EVENTS

Developer's Name: HIGH DESERT CENTER, LLC

Developer's Address: 5925 N. MINA VISTA AVE, TUCSON, AZ 85718

Telephone No (760) 646-0642 Email address: _____

Trip Generation Rates from ITE Latest Edition

Land Use (1) Event Venue
Development Sq Ft 8,064
ITE Land Use Code N/A
Daily Trips 99
AM Peak Hour Trips
Inbound 6
Outbound 4
Total 10
PM Peak Hour Trips
Inbound 11
Outbound 9
Total 20

Land Use (2) _____
Development Sq Ft _____
ITE Land Use Code _____
Daily Trips _____
AM Peak Hour Trips
Inbound _____
Outbound _____
Total _____
PM Peak Hour Trips
Inbound _____
Outbound _____
Total _____

(Use Additional Sheet(s), if Necessary)

Pass-by Trips (%), if applicable: _____%
Land Use (1) _____
ITE Land Use Code _____
Daily Trips _____
AM Peak Hour Trips
Inbound _____
Outbound _____
Total _____
PM Peak Hour Trips
Inbound _____
Outbound _____
Total _____

Land Use (2) _____
ITE Land Use Code _____
Daily Trips _____
AM Peak Hour Trips
Inbound _____
Outbound _____
Total _____
PM Peak Hour Trips
Inbound _____
Outbound _____
Total _____

Project Opening Year: _____

Study Intersections: 1 N/A
2 _____
3 _____
4 _____
5 _____

Build-out Year: _____

6 _____
7 _____
8 _____
9 _____
10 _____

(Use Additional Sheet(s) and Maps to show project Boundaries & Attach memo for project Description)

Town of Yucca Valley
Traffic Scope Approval Form

To be Completed by applicant consultant and approved by Public Works prior to start of study.

Study Roadway Segments: 1 N/A _____ 2 _____
3 _____ 4 _____
5 _____ 6 _____

Proposed Development Use: ☐ Residential ☐ Commercial ☐ Mixed-Use ☑ Other

Software Methodology: ☐ Synchro ☐ HCS

Additional Issues to be considered: ☐ Traffic Calming Measures ☐ Queuing Analysis

☐ Bike/Ped Accommodations ☐ Merge Analysis ☐ Gap Analysis

☐ Actuation/Coordination ☐ Safety Analysis ☐ Sight Distance Analysis

Is the project screened from VMT assessment? ☑ Yes ☐ No

VMT Screening Justification Low VMT Area & Less than 110 daily trips

Ambient Growth Rate: _____%

Trip Distribution: East _____% West _____% North _____% South _____%

Consultant Preparer's Name: Translutions, Inc.

Address: 17632 Irvine Bl, Ste 200, Tustin CA 92780

Telephone No. 949-656-3131 PE / TE License # T2847, C81872

Email Address: sandipan@translutions.com

Signature: Sandipan Bhattacharjee Date: 10/16/24

Approved By (Public Works Department)

Signature: _____ Date: _____

Name: _____ Title: _____