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Date:	April 7, 2022
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То:	City of Moreno Valley
Site:	North of Alessandro Boulevard Between Morrison Street and Nason Street
Subject:	Vehicle Miles Traveled (VMT) Screening Analysis

This technical memorandum evaluates the need to prepare a Vehicle Miles Traveled (VMT) analysis for the proposed residential project (Alessandro Walk) in the City of Moreno Valley. The project proposes to construct 227 single family dwelling units, including 19 innovative live-work units near the Alessandro Boulevard frontage. These live-work units are expected to function as private offices for work-from-home setups with no public access at all. Visitors to these offices are expected only occasionally. The project would include 9 live-work units 136.67 SF office space, and 10 live-work units with 191.89 SF of office space which totals 3,148.93 SF of office space on the project site. The office spaces are not large enough to or intended to accommodate any employees. The project would be located on a vacant 18-acre property on the north side of Alessandro Boulevard between Morrison Street and Nason Street. Access to the project site will be provided via 2 unsignalized full-access driveways at the intersections of Alessandro Boulevard/Blue Ribbon Lane and Pegasus Way/Volga Lane. The project site plan is shown in Figure 1.

VMT Screening Analysis

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating Transportation impacts. SB743 specified that the new criteria should promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. The bill also specified that delay-based level of service could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3 - Determining the Significance of Transportation Impacts states that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

City of Moreno Valley Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled includes VMT analysis methodology, impact thresholds, and screening thresholds to determine if projects would require a vehicle miles traveled (VMT) analysis. The City's TIA Guidelines provide criteria for projects that would be considered to have a less-than significant impact on VMT and therefore could be screened from further VMT analysis. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

Screening Criteria

- 1. Transit Priority Area (TPA) Screening.
- 2. Low VMT Area Screening.
- 3. Project Type Screening.

The applicability of each Screening Criteria to the proposed project is discussed below.

<u>Screening Criteria 1 – Transit Priority Area (TPA) Screening</u>: According to the City's TIA guidelines, projects located within a TPA may be presumed to have a less than significant impact absent substantial evidence to the contrary. The project is not located within a TPA therefore, Screening Criteria 1 is not satisfied.

<u>Screening Criteria 2 – Low VMT Area Screening</u>: According to the City's TIA guidelines, residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. As per SCAG Sustainable Communities Strategy Technical Report (9-3-2020), the average suburban offices have 350 square feet per employee whereas urban offices have 280 square foot per employee. The proposed project is inclusive of 9 live-work units with 136.67 sq. ft office space, and 10 live-work units with 191.89 sq. ft of office space. These office spaces are not intended to and not large enough to accommodate additional employees other than the residents who would live in the live-work units. Hence no VMT per employee as a result of the work spaces in the live-work units is expected.

<u>Screening Criteria 3 – Project Type Screening:</u> According to the City's TIA guidelines, Local serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. The project is a residential project, not a retail project; therefore, Screening Criteria 3 does not apply.

Summary

EPD Solutions used the City of Moreno Valley Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled that discusses analysis methodologies and screening thresholds to determine if this project would require a vehicle miles traveled (VMT) analysis. If a project meets the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

- 1. Transit Priority Area (TPA) Screening.
- 2. Low VMT Area Screening.
- 3. Project Type Screening.

The project would not meet Screening Criteria 1 or 3. However, the proposed project is inclusive of 9 livework units with 136.67 sq. ft office space, and 10 live-work units with 191.89 sq. ft of office space. These office spaces are not intended to and not large enough to accommodate additional employees other than the residents who would live in the live-work units. Hence no VMT per employee as a result of the work spaces in the live-work units is expected. Furthermore, Screening Criteria 2 – Low VMT Area Screening is satisfied, VMT impacts would be considered less than significant and further analysis of VMT would not be required.

If you have any questions about this information, please contact me at (909) 525-0528 or hashem@epdsolutions.com.



Figure 1: Project Site Plan