



June 25, 2020

Mr. Kent Norton  
MIG, Inc.  
1650 Spruce Street, Suite 102  
Riverside, CA 92507

**RE: S2A Modular Manufacturing Project Vehicle Miles Traveled (VMT) Memorandum**  
19-0164

Dear Mr. Norton:

**INTRODUCTION**

Ganddini Group, Inc. is pleased to submit this Vehicle Miles Traveled (VMT) Memorandum for the proposed S2A Modular Manufacturing Project. This analysis supplements the S2A Modular Manufacturing Project Traffic Impact Analysis (Ganddini Group, Inc., June 26, 2020) ["Project TIA"]. A copy of the trip generation forecast from the Project TIA (Table 2) is included in Attachment A.

**PROJECT DESCRIPTION**

The 32.1-acre project site is located at the northwest corner of State Street and Crows Nest Place in the City of Hemet. The project site is currently vacant. The proposed project involves construction of a 231,669 square foot manufacturing facility for modular housing.

The proposed project is planned to be constructed in two phases. The project proposes a phase one construction of 118,294 square foot of manufacturing land use with an anticipated completion in Year 2021 and a second construction phase of 113,335 square foot of manufacturing land use with a fully operational completion by Year 2024.

**PROJECT TRIPS**

Based on the project trip generation forecast as documented in the Project TIA (see Attachment A), Project Phase 1 (118,314 square foot of manufacturing) is forecast to generate a total of approximately 465 daily vehicle trips, including 73 vehicle trips during the AM peak hour and 79 vehicle trips during the PM peak hour. In PCE trips, Project Phase 1 is forecast to generate a total of approximately 598 daily PCE trips, including 111 PCE trips during the AM peak hour and 104 PCE trips during the PM peak hour.

Completion of the proposed project (231,669 square foot of manufacturing) is forecast to generate a total of approximately 911 daily vehicle trips, including 143 vehicle trips during the AM peak hour and 155 vehicle trips during the PM peak hour. In PCE trips, completion of the proposed project is forecast to generate a total of approximately 1,170 daily PCE trips, including 218 PCE trips during the AM peak hour and 204 PCE trips during the PM peak hour.

## VEHICLE MILES TRAVELED (VMT) ANALYSIS

The City of Hemet has not established VMT analysis procedures or thresholds of significance at this time. Therefore, this section provides a background of VMT preliminary VMT assessment in accordance with the State of California “Technical Advisory”.

### BACKGROUND

California Senate Bill 743 (SB 743) directs the State Office of Planning and Research (OPR) to amend the California Environmental Quality Act (CEQA) Guidelines for evaluating transportation impacts to provide alternatives to Level of Service that “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Traveled (VMT) as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. Agencies may currently opt-in to applying the updated CEQA guidelines for VMT analysis and implementation is required State-wide by July 1, 2020.

The updated CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Where quantitative models or methods are unavailable, Section 15064.3 allows agencies to assess VMT qualitatively using factors such as availability of transit and proximity to other destinations. The Technical Advisory on Evaluating Transportation Impacts in CEQA (State of California, December 2018) [“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. At publishing of this report, many jurisdictions are currently in the process of developing updated procedures for VMT analysis.

### PROJECT ASSESSMENT

Since City of Hemet has not established VMT analysis procedures at this time, the project VMT assessment is based on guidance from the State’s Technical Advisory and the Western Riverside Council of Governments (WRCOG) VMT Screening Tool. The Technical Advisory provides the following potential screening criteria for certain land development projects that may be presumed to result in a less than significant VMT impact:

- Local serving retail, schools, daycare, student housing, etc.
- Small projects generating less than 110 trips per day.
- Residential and office projects located in areas with low-VMT.
- Projects near transit stations or major transit stop.
- Residential projects with a high percentage of affordable housing.

For mixed-use projects, the Technical Advisory recommends that lead agencies can evaluate each component of a mixed-use project independently and apply the thresholds of significance for each land use (e.g., office and retail). Alternatively, a lead agency may consider only the project’s dominant use. In the analysis of each use, a project should take credit for internal capture.

### Screening Assessment for Local-Serving Uses

The Technical Advisory defines local serving retail as less than 50,000 square feet. New retail development typically redistributes shopping trips rather than creating new trips. By adding retail opportunities into the urban fabric and thereby improving proximity, local-serving retail tends to shorten trips and reduce VMT. Similarly, other local serving uses such as schools, daycare, student housing, and public facilities would typically improve the proximity of such uses within the community, thereby shortening travel distances and reducing VMT.

The proposed project is not considered local-serving retail; therefore, this screening criteria does not apply.

### Screening Assessment for Small Projects

As noted in the Technical Advisory, CEQA Guidelines § 15301, subdivision (e)(2) provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

Early adopters of the VMT metric are using similar or slightly higher thresholds for small projects. The Cities of Santa Ana and San Jose, for example, have adopted a screening threshold for small infill projects based on 110 daily trips. The City of Los Angeles has established a screening threshold for projects that generate fewer than 250 net daily trips. The draft guidelines by the San Diego Section of the Institute of Transportation Engineers recommends a screening threshold as high as 1,000 daily trips for projects that are consistent with a General or Community Plan or 500 daily trips for projects that are inconsistent with a General or Community Plan.

The proposed project is forecast to generate more than 110 daily trips; therefore, the proposed project cannot be presumed to result in a less than significant VMT impact under this screening criteria.

### Screening Assessment for Projects in Low VMT Areas

The Technical Advisory provides guidance indicating that residential and office projects located in areas with low VMT and that exhibit similar VMT-related features (e.g., density, mix of uses, transit accessibility), will typically exhibit similarly low VMT. Identifying low VMT areas requires maps to be created using VMT data from travel surveys or a travel demand model that illustrate areas that are below the established VMT threshold.

A low-VMT screening analysis has been performed using the WRCOG VMT Screening Tool. The project site consists of Assessor's Parcel Numbers 439030009, 439030010, and 439040023, all of which are located within the Riverside Traffic Analysis Model (RivTAM) Traffic Analysis Zone 4,259. Since the City of Hemet has not established a VMT threshold, Table A below evaluates eight potential thresholds for non-residential uses based on those more commonly observed among early adopters of the VMT metric:

**Table A - Low VMT Area Screening Analysis**

Metric	Project (TAZ 4259)	Potential Thresholds			
		Regional Average	15% Below Regional Average	Jurisdictional Average (WRCOG Default)	15% Below Jurisdictional Average
Total VMT / SP	17.30	24.32	20.67	22.75	19.34
<i>Project VMT ≤ threshold?</i>	--	Yes (Pass)	Yes (Pass)	Yes (Pass)	Yes (Pass)
Home-Based Work VMT / Worker	6.76	13.53	11.50	7.62	6.48
<i>Project VMT ≤ threshold?</i>	--	Yes (Pass)	Yes (Pass)	Yes (Pass)	No (Fail)

Notes:

Source: WRCOG VMT Screening Tool

VMT = Vehicle Miles Traveled; SP = Service Population

As shown in Table A, the proposed project is estimated to generate approximately 17.30 VMT per service population and 6.76 home-based work VMT per worker. The project VMT does not exceed the screening threshold based on jurisdictional average, which is the default screening threshold used in the WRCOG Screening Tool. Additionally, the project satisfies the screening criteria for seven out of the eight potential thresholds evaluated. For purposes of this analysis, the proposed project is presumed to result in a less than significant VMT impact based on the WRCOG low-VMT area screening threshold.

Screening Assessment for Projects Near Transit Stations

As noted in the Technical Advisory, CEQA Guideline Section 15064.3, subdivision (b)(1) states that lead agencies generally should presume that certain projects proposed within one-half mile of an existing major transit stop or an existing stop along a high-quality transit corridor<sup>1</sup> will have a less than significant impact on VMT. This presumption would not apply, however, if project-specific information indicates that the project may still generate significant levels of VMT.

Based on review of the WRCOG VMT Screening Tool, the proposed project is not located within one-half mile of a major transit stop or high-quality transit corridor; therefore, the proposed project cannot be presumed to result in a less than significant VMT impact under this screening criteria.

Screening Assessment for Affordable Housing

The Technical Advisory notes that adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT. In areas where existing jobs-housing match is closer to optimal, lower income housing nevertheless generates less VMT than market-rate housing. Therefore, a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT. Evidence supports a presumption of less than significant impact for a 100

<sup>1</sup> 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.")

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percent affordable residential development (or the residential component of a mixed-use development) in infill locations. Lead agencies may develop their own presumption of less than significant impact for residential projects containing a particular amount of affordable housing, based on local circumstances and evidence. Furthermore, a project which includes any affordable residential units may factor the effect of the affordability on VMT into the assessment of VMT generated by those units.

The proposed project does not include affordable housing; therefore, this screening criteria does not apply.

## CONCLUSION

The proposed project is presumed to result in a less than significant VMT impact based on the WRCOG low-VMT area screening threshold.

It has been a pleasure to assist you with this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 795-3100.

Sincerely,



Perrie Ilercil, PE (AZ)  
Senior Engineer



Giancarlo Ganddini, TE, PTP  
Principal

**ATTACHMENT A**

**S2A MODULAR MANUFACTURING PROJECT TRIP GENERATION TABLE**

**Table 2  
Project Trip Generation**

Land Use/Vehicle Type	Source <sup>1</sup>	Trip Generation Rates per TSF <sup>2</sup>						Daily
		AM Peak Hour			PM Peak Hour			
		% In	% Out	Total	% In	% Out	Total	
Manufacturing	ITE 140	77%	23%	0.62	31%	69%	0.67	3.93
Percent Cars	[a]	--	--	60.53%	--	--	76.83%	78.60%
Percent Trucks	[a]	--	--	39.47%	--	--	23.17%	21.40%
Car Trips per TSF		0.289	0.086	0.375	0.160	0.355	0.515	3.089
Truck Trips per TSF		0.188	0.056	0.244	0.048	0.107	0.155	0.841
<u>Truck Breakdown by Axle</u>	<u>Percent<sup>3</sup></u>							
2-Axle Trucks	32.70%	0.061	0.018	0.079	0.016	0.035	0.051	0.275
3-Axle Trucks	17.90%	0.034	0.010	0.044	0.009	0.019	0.028	0.151
4+ Axle Trucks	49.40%	0.093	0.028	0.121	0.024	0.053	0.077	0.415

Vehicle Trips Generated								
Land Use/Vehicle Type	Quantity (TSF)	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Manufacturing	231.669							
Cars		67	20	87	37	82	119	716
Trucks								
2-Axle Trucks		14	4	18	4	8	12	64
3-Axle Trucks		8	2	10	2	4	6	35
4+ Axle Trucks		22	6	28	6	12	18	96
Subtotal Trucks		44	12	56	12	24	36	195
Subtotal Phase 1	118.314	57	16	73	25	54	79	465
Subtotal Phase 2	113.355	54	16	70	24	52	76	446
<b>TOTAL VEHICLE TRIPS GENERATED</b>		<b>111</b>	<b>32</b>	<b>143</b>	<b>49</b>	<b>106</b>	<b>155</b>	<b>911</b>

Passenger Car Equivalent (PCE) Trips Generated								
Land Use/Vehicle Type	Quantity (TSF)	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Manufacturing	231.669							
Cars		67	20	87	37	82	119	716
Trucks	<u>PCE Factor<sup>4</sup></u>							
2-Axle Trucks	1.5	21	6	27	6	12	18	96
3-Axle Trucks	2.0	16	4	20	4	9	13	70
4+ Axle Trucks	3.0	65	19	84	17	37	54	288
Subtotal Trucks	--	102	29	131	27	58	85	454
Phase 1 (Cars)	118.314	34	10	44	19	42	61	366
Phase 1 (Trucks)		52	15	67	14	29	43	232
Subtotal Phase 1		86	25	111	33	71	104	598
Phase 2 (Cars)	113.355	33	10	43	18	40	58	350
Phase 2 (Trucks)		50	14	64	13	29	42	222
Subtotal Phase 2		83	24	107	31	69	100	572
<b>TOTAL VEHICLE TRIPS GENERATED</b>		<b>169</b>	<b>49</b>	<b>218</b>	<b>64</b>	<b>140</b>	<b>204</b>	<b>1,170</b>

**Notes:**

(1) Source:

ITE = Institute of Transportation Engineers, Trip Generation Manual, 10th Edition, 2017, Land Use Code ### (page 40 to 41).

[a] City of Fontana, Truck Trip Generation Study, August 2003. Light industrial values used for manufacturing (page 13 and 22).

(2) TSF = Thousand Square Feet

(3) Truck by axle percentages obtained from City of Fontana, Truck Trip Generation Study, August 2003.

(4) PCE factors recommended by County of San Bernardino Congestion Management Program.