Appendix H-2

Iron Lofts Multifamily Project Vehicle Miles Traveled
VMT Screening Assessment

Ganddini Group, Inc

December 27, 2024

TECHNICAL MEMORANDUM

TO: For applicant submittal to the CITY OF RIVERSIDE

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

DATE: December 27, 2024

SUBJECT: Iron Lofts Multifamily Project Vehicle Miles Traveled VMT Screening Assessment
GGI Project No. 19630

Ganddini Group, Inc. is pleased to provide this VMT Screening Assessment for the Iron Lofts Multifamily project in the City of Riverside. The purpose of this memorandum is to determine if the preparation of a traffic impact analysis with or vehicle miles traveled (VMT) analysis is necessary based on the transportation study guidelines and screening criteria established by the City of Riverside. We trust the findings of this analysis will aid the City of Riverside in assessing the project.

PROJECT DESCRIPTION

The 6.97-acre project site is located east of Commerce Street between 5th Street and Mission Inn Avenue in the City of Riverside, California. The project site is currently partially developed with commercial/industrial buildings and zoned as Business & Manufacturing Park Zone (BMP).

The proposed project (TTM 38624) involves removal of the existing buildings and construction of 295 mid-rise multifamily dwelling units and 5 low-rise multifamily dwelling units within a residential complex. Vehicular access for the project site is proposed via two driveways with one on 5th Street and one on Mission Inn Avenue. The proposed site plan is shown in Attachment A.

The project site requires a General Plan Amendment and Zoning Amendment to rezone the site from Business & Manufacturing Park Zone (BMP) to Mixed-use Urban (MU-U) to accommodate the residential development and a Specific Plan Amendment to amend the Riverside Marketplace Specific Plan to expand the mixed-used Marketplace Sub-area. The proposed plan also includes a street vacation of 6th Street from Commerce Street to the east side of the project.

TRIP GENERATION

Table 1 shows the proposed project trip generation forecast is based on average rates obtained from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition, 2021) for Land Use Codes 221 (Multifamily Housing – Mid-rise, Close to transit) and 220 (Multifamily Housing – Low-rise, Close to transit).

For informational purposes, the project trip generation estimate is provided in Attachment B. As shown in Attachment B, the proposed project is forecast to generate a total of approximately 1,213 net daily trips, including 90 net trips during the AM peak hour and 72 net trips during the PM peak hour.

VEHICLE MILES TRAVELED SCREENING CRITERIA

The vehicle miles traveled (VMT) screening assessment has been prepared in accordance with *City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment (LOS, July* 2020 ["City TIA Guidelines"], which 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 City TIA 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:

- Projects located within a Transit Priority Area (TPA)
- Projects located within a low VMT area
- Project Type Screening
- Mixed-Use Projects
- Redevelopment Projects

TPA Screening

Projects located within a TPA, defined as within one-half mile of a major transit stop[1] or high-quality transit corridor[2], may be presumed to result in a less than significant VMT impact absent substantial evidence to the contrary. The City TIA Guidelines note that this screening criteria may not apply if the project has a floor area ratio (FAR) less than 0.75, the project is inconsistent with applicable Sustainable Communities Strategy, or the project constructs a smaller number of moderate or high-income residential units than the existing number of affordable residential units.

Based on a review of the Western Riverside County of Governments (WRCOG) VMT Screening Tool[3], the proposed project is located within a TPA. Additionally, the project FAR is greater than 0.75; therefore, this screening criteria is met.

Low VMT Area Screening

As prescribed in the City TIA Guidelines, the WRCOG VMT Screening Tool was used to assess low VMT area screening for the project. The VMT Screening Tool was developed using the County travel forecasting model to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs) within the County transportation region. TAZs are geographic polygons similar to census block groups used to represent areas of homogenous travel behavior. Total daily VMT per resident for residential development was estimated for each TAZ. This presumption may not be appropriate if the project land uses would alter the existing built environment in such a way as to increase the rate or length of vehicle trips.

[1] 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.).

[2] Fixed route bus service with less than 15-minute headways during the peak commute hours (Pub. Resources Code, § 21155).

[3] The WRCOG VMT Screening Tool was developed from the San Bernardino Transportation Analysis Model (WRCOG) travel forecasting model to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs).

Based on the VMT Screening Tool results for the project site, located within TAZ 2102, the baseline year (2024) for the project TAZ is equal to 7.9 VMT per resident, which is well below than the City baseline VMT per resident (12.3). Therefore, the proposed project satisfies the City-established screening criteria for projects located in a low VMT area and the project's VMT impact would be less than significant and the project's VMT impact would be less than significant. Appendix C contains the WRCOG Screening Tool results for the project site.

Project Type Screening

The City TIA Guidelines identify the several types of projects that may be presumed to have a less than significant VMT impact as they are local serving and thus can be expected to reduce VMT or they are small enough to have a negligible impact:

- Projects consisting of local servicing land use
  - Local-serving retail less than 50,000 square feet
  - Local-serving K-12 schools
  - Local parks
  - Day care centers
  - Local-serving banks
  - Local gas stations and car washes
  - Local-serving hotels (e.g., non-destination hotels)
  - Student housing projects
  - Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
  - Projects consisting of 100% affordable housing
- Trip Screening
  - Projects generating with less than 110 daily passenger vehicle[4] trips (ADT)
    - 11 single-family residential dwelling units
    - 16 multi-family residential dwelling units
    - 10,000 square feet of office
    - 15,000 square feet of light industrial
    - 63,000 square feet of warehousing
    - 79,000 square feet of high-cube transload and short-term storage warehouse

The project generates more than 110 net new daily trips. Therefore, the project-type screening criteria is not met.

Mixed-Use Projects

Each component of a mixed-use project may be evaluated independently and apply the significance threshold for each project type included (e.g., residential and retail). The project land use is 100% residential; therefore, this does not apply to this project.

[4] As specified by the OPR Technical Advisory, 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 truck trips should not contribute to a finding of significant traffic (VMT) impact.

Redevelopment Projects

Where a project replaces existing VMT generating land uses, if the replacement leads to a net overall decrease in VMT, the project would provide a less than significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply). Based on the existing (retail) and the project (residential) land uses, the redeveloped VMT is not expected to be reduced; therefore, this does not apply to this project.

CONCLUSION

The proposed project is forecast to generate a total of approximately 1,213 net daily trips, including 90 net trips during the AM peak hour and 72 net trips during the PM peak hour.

The proposed project satisfies the City-established vehicle miles traveled (VMT) screening criteria for projects located within a TPA and low VMT area. Therefore, preparation of a transportation impact study with VMT analysis is not warranted, and the project 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 ext. 103 or perrie@ganddini.com.