

February 28, 2019

Mr. Russell Brady
Riverside County Planning Department
P.O. Box 1409
Riverside, CA 92502

SUBJECT: CANTERWOOD (TTM No. 37439) TRAFFIC IMPACT ANALYSIS - VEHICLE MILES TRAVELED

Dear Mr. Russell Brady:

In the fall of 2013, Senate Bill 743 (SB 743) was passed by the legislature and signed into law by the governor. For some parts of California (and eventually the entire state), this legislation will change the way that transportation studies are conducted for environmental documents. In the areas where SB 743 is implemented, delay-based metrics such as roadway capacity and level of service will no longer be the performance measures used for the determination of the transportation impacts of projects in studies conducted under the California Environmental Quality Act (CEQA). Instead, new performance measures such as Vehicle Miles Traveled (VMT) will be used.

During the preparation of the traffic impact study, guidelines for the implementation of SB 743 were not yet incorporated into CEQA. Therefore, the traffic impact study followed current practice regarding state and local guidance as of the date of preparation. In December 2018 CEQA Guidelines were updated to include a threshold for evaluating traffic impacts using the VMT methodology. This new methodology is required to be used statewide for projects beginning in or after July 2020 unless the lead agency adopts the VMT thresholds earlier. As such, and because County of Riverside as the lead agency has not yet adopted VMT thresholds, the analysis for this project utilizes the LOS methodology.

Notwithstanding, for purposes of full disclosure, it is estimated that the Project would generate approximately 10,971 annual VMT per capita¹, based on the California Emissions Estimator Model (CalEEMod) v2016.3.2 as calculated in the report *Canterwood (Tentative Tract Map No. 37439) Greenhouse Gas Analysis*, Urban Crossroads, Inc. (2019).

If you have any questions, please contact me directly at (949) 336-5982.

Respectfully submitted,

URBAN CROSSROADS, INC.



Charlene So, PE
Senior Associate

¹ Total Annual VMT calculated by CalEEMod: 18,321,815 ÷ 1,670 residents (574 dwelling units x 2.91 persons per dwelling).