

3.13 TRANSPORTATION

This section addresses potential transportation impacts that may result from construction and operation of the Project. The following discussion addresses the existing transportation conditions in the Project area, identifies applicable regulations, evaluates the Project's consistency with applicable goals and policies, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the Project. The information and analysis herein rely on the following investigations and collectively document the traffic and circulation conditions of the Project Site found in **Appendix K** of this EIR:

- Traffic Impact Study for Beaumont Potrero Interchange Industrial Warehouse, August 2021, prepared by Kimley-Horn
- Beaumont Potrero Interchange Industrial Warehouse Project Vehicle Mile Traveled (VMT) Analysis, August 7, 2020 prepared by Kimley-Horn.

3.13.1 ENVIRONMENTAL SETTING

EXISTING TRANSPORTATION SYSTEM

Existing Roadway System

Regional vehicular access to the site is provided by State Route (SR-60) and Interstate 10 (I-10). I-10 is an east-west freeway, located approximately 1.75 miles east of the Project Site. I-10 provides three travel lanes in each direction and connects directly to SR-60 and SR-79. SR-60 is an east-west freeway located immediately north of the Project Site. SR-60 provides two travel lanes in each direction. East of the Project Site, SR-60 merges into I-10.

Local Access

Oak Valley Parkway is an east-west roadway located approximately $\frac{3}{4}$ -mile north of the Project Site. Oak Valley Parkway provides two travel lanes in each direction west of Potrero Boulevard and one lane in each direction east of Potrero Boulevard. Oak Valley Parkway is shown as a Major Frontage Road west of Potrero Boulevard and an Urban Arterial east of Potrero Boulevard on the City of Beaumont Circulation Element of the General Plan (Circulation Element).

4th Street is an east-west roadway that currently extends between Logistics Way and California Avenue. As part of future Project construction by others, 4th Street is planned to be extended westward from its current terminus and past the future extension of Potrero Boulevard. 4th Street will form the south boundary of the Project. 4th Street is shown as a Major roadway on the City of Beaumont Circulation Element.

Potrero Boulevard is a north-south roadway that extends northward from SR-60. Potrero Boulevard is planned to be extended southward from its current terminus to intersect with 4th Street, and to have an interchange with SR-60. When extended, Potrero Boulevard will form the east boundary of the

Warehouse Site. Potrero Boulevard is shown as an Urban Arterial north of 4th Street and a Secondary roadway south of 4th Street on the City of Beaumont Circulation Element.

Veile Avenue is a north-south roadway located approximately 1.5 miles east of the Project Site. Veile Avenue provides one travel lane in each direction, and is shown as a Major roadway on the City of Beaumont Circulation Element.

Beaumont Avenue/SR-79 is a north-south State highway located 2-1/4 miles east of the Project Site. Beaumont Avenue provides two travel lanes in each direction, with direct access to I-10. Beaumont Avenue is shown as an Expressway south of I-10 and a Secondary roadway north of I-10 on the City of Beaumont Circulation Element.

Transit Service

Public transportation within the City of Beaumont is provided by PASS Transit, operated by the Riverside County Transportation Commission (RCTC); the Riverside Transit Authority (RTA) and the Sunline Transit Agency lines. The PASS Beaumont Lines 2, 3, and 4 service the business area of Beaumont, east of California Avenue. The nearest bus stop to the Project Site is located near the intersection of 6th Street and Elm Avenue, approximately two miles to the east.

All three Beaumont lines end at the Walmart Supercenter, at Highland Springs Avenue and I-10. This shopping center is a transfer point for the PASS Banning lines, as well as the RTA and the Sunline Transit Agency lines.

3.13.2 REGULATORY SETTING

FEDERAL REGULATIONS

Federal rules and regulations govern many facets of the City's transportation system, including transportation planning and programming; funding; and design, construction, and operation of facilities. The City complies with all applicable rules and regulations of the Federal Highway Administration, the Urban Mass Transit Administration, the Federal Railroad Administration, the Federal Aviation Administration, and other Federal agencies. In addition, the City Coordinates with Federal resource agencies where appropriate in the environmental clearance process for transportation facilities.

STATE

Senate Bill (SB) 743

Public Resources Code (PRC) § 21099 (SB 743) eliminated the use of vehicle delay-based level of service (LOS) as a threshold under the California Environmental Quality Act (CEQA). The Governor's Office of Planning and Research (OPR) has recommended the use of Vehicle Miles Traveled (VMT) as the replacement for LOS for the purposes of determining a significant transportation impact under CEQA.

The City of Beaumont has adopted VMT thresholds of significance for determining the significance of transportation impacts based on the Western Riverside Council of Governments (WRCOG) *Recommended*

Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (updated March 2020). The City has adopted the following:

- Utilizing the Riverside County Travel Demand Model (RIVTAM/RIVCOM) as its methodology to measure VMT.
- Utilizing the Riverside County Travel Demand Model (RIVTAM/RIVCOM) as its method to analyze a Project's VMT impact.
- Utilizing a threshold consistent with the City's current average VMT per service population (population plus employment).

Technical Advisory on Evaluating Transportation Impacts in CEQA

The Governor's Office of Planning and Research (OPR) released the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) in December 2018. The Technical Advisory aids in the transition from LOS to VMT methodology for transportation impact analysis under CEQA. The advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.

California Department of Transportation

The California Department of Transportation (Caltrans) owns and operates the State highway system, which includes the freeways and State routes within California. As discussed above, VMT are now used which, although Caltrans recognizes will not apply to all projects on the State Highway System (SHS); however, they would apply to the Project. Caltrans also recognizes that VMT is the most appropriate primary measure of transportation impacts for capacity increasing transportation projects on the SHS.

In January 2019, the Natural Resources Agency updated guidance on the evaluation of traffic impacts to State highway facilities from LOS to VMT. The new guidance shifts traffic analysis from delay and operations to VMT when evaluating transportation impacts under CEQA. As discussed above, SB 743 created a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 required the Governor's OPR to amend the CEQA guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses.

Sustainable Communities Strategies: Senate Bill 375 – Land Use Planning

SB 375 provides for a new planning process to coordinate land use planning and regional transportation plans (RTP) and funding priorities in order to help California meet the greenhouse gas (GHG) reduction goals established in Assembly Bill (AB) 32. SB 375 requires that RTPs developed by metropolitan planning organizations (MPO) relevant to the Project Site (e.g., Southern California Association of Governments [SCAG]) incorporate a "sustainable communities strategy" in their RTPs that will achieve GHG emission reduction targets set by the California Air Resources Board (CARB). SB 375 also includes provisions for streamlined CEQA review for some infill projects, such as Transit-Oriented Developments (TODs).

As an MPO, SCAG is responsible for preparing and utilizing a public participation plan that is developed in consultation with all interested parties and provides reasonable opportunities for interested parties to comment on the content of SCAG's proposed RTP and the Regional Transportation Improvement Program (TIP). SB 375 requires SCAG to adopt a public participation plan for development of the sustainable communities strategy (SCS) and an alternative planning strategy (APS). Further, as required by SB 375, SCAG will conduct at least two informational meetings in each county within the region for members of the board of supervisors and city councils on the SCS and APS, if any. The purpose of the meetings shall be to present a draft of the SCS to members of the board of supervisors and city council members in that county and to solicit and consider their input and recommendations.

REGIONAL

Riverside County Long Range Transportation Study

The Riverside County Long Range Transportation Study (LRTS) is meant to address the challenges of a growing population, and growing industrial and warehousing base. The Riverside County Transportation Commission (RCTC) is the Regional Transportation Planning Agency (RTPA) for Riverside County. RCTC is charged with coordinating transportation planning, funding and facilitation of all modes of transportation in Riverside County. Short and long-range transportation is a key responsibility of RCTC. RCTC plans and implements transportation and transit improvements, particularly those that affect more than one jurisdiction. The agency also assists local governments with money for local streets and roads and develops plans and programs to improve commuting and goods movement. Policies adopted by RCTC also aim to ensure that all persons have equitable access to transportation.

The purpose of the LRTS is meant to strengthen transportation in the region in order to improve mobility, safety, and economic prosperity for Riverside County residents. The LRTS dovetails with and bridges local plans and SCAG's RTP/SCS. It supports the County's economy and quality of life through smart planning, project development and implementation. The Study is multimodal in nature and encompasses all forms of transportation: highways, local roads, transit, rail, pedestrian and bicycle facilities.

The four basic purposes of the LRTS is to:

- Develop strategies to address transportation challenges.
- Provide a realistic vision of transportation in Riverside County in 2045.
- Develop a list of high priority feasible and fundable projects.
- Comprise RCTC's input to SCAG's RTP/SCS (Connect SoCal), scheduled to be released in 2020.

SCAG's RTP/SCS, is a long-range regional plan covering the six counties within the SCAG region. The Riverside County LRTS focuses only on Riverside County and its cities. SCAG's RTP/SCS is required to address transportation and related elements such as housing, aviation, air quality conformity, public health, environmental justice, and conservation lands. The LRTS focuses on transportation projects and funding.

RCTC also functions as the County Congestion Management Agency, and contained within the LRTS is the County of Riverside Congestion Management Program (CRCMP), the purpose of which is provided immediately below.

County of Riverside Congestion Management Program

The passage of Proposition 111 in June 1990 established a process for each metropolitan county in California that has an urbanized area with a population over 50,000 (which would include the County of Riverside) to prepare a congestion management program (CMP). The CMP that was prepared by the RCTC in 2011 in consultation with the County and cities in Riverside County is an effort to more directly align land use, transportation, and air quality management efforts and to promote reasonable growth management programs that effectively use statewide transportation funds while ensuring that new development pays its fair share of needed transportation improvements. Additionally, the passage of Proposition 111 provided additional transportation funding through a \$0.09 per gallon increase in the state gas tax.

The focus of the CMP is the development of an Enhanced Traffic Monitoring System in which real-time traffic count data can be accessed by the RCTC to evaluate the condition of the Congestion Management System, as well as meeting other monitoring requirements at the state and federal levels. Per the CMP-adopted LOS standard of E, when a Congestion Management System segment falls to LOS F, a deficiency plan is required. Preparation of a deficiency plan would be the responsibility of the local agency where the deficiency is located. Other agencies identified as contributors to the deficiency would also be required to coordinate with the development of the plan. The plan must contain mitigation measures, including transportation demand management strategies and transit alternatives, and a schedule of mitigating the deficiency. To ensure that the Congestion Management System is appropriately monitored to reduce the occurrence of CMP deficiencies, it is the responsibility of local agencies, when reviewing and approving development proposals, to consider the traffic impacts on the Congestion Management System.

LOCAL

City of Beaumont General Plan

Mobility Element

The Mobility Element of the Beaumont General Plan includes goals and policies that would be applied to the Project related to traffic. Goals and policies identified in the Mobility Element of the General Plan that would be applied to the proposed Project are listed below and Project consistency with them is discussed in ***Table 3.10-3, Beaumont General Plan Consistency Analysis*** of this EIR:

Goal 4.1: **Promote smooth traffic flows and balance operational efficiency, technological, and economic feasibility.**

Policy 4.1.1: Reduce vehicular congestion on auto-priority streets to the greatest extent possible.

Policy 4.1.2 Maintain LOS D on all auto-priority streets in Beaumont. LOS E is considered acceptable on non-auto-priority streets.

Goal 4.6 **An efficient goods movement system that ensures timely deliveries without compromising quality of life, safety, or smooth traffic flow for Beaumont residents.**

Policy 4.6.1 Prioritize goods movement along specific routes in the city, consistent with the adopted layered network, to foster efficient freight logistics.

Policy 4.6.2 Minimize or restrict heavy vehicle traffic near sensitive areas such as schools, parks, and neighborhoods.

3.13.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA UNDER CEQA

Appendix G of the State CEQA Guidelines contains the Environmental Checklist Form, which includes questions related to transportation. The issues presented in the Environmental Checklist Form have been utilized as Thresholds of Significance in this section. Accordingly, a project may create a significant environmental impact if one or more of the following occurs:

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- d) Result in inadequate emergency access?

METHODOLOGY AND ASSUMPTIONS

The Project is evaluated against the aforementioned significance criteria, as the basis for determining the level of impacts related to transportation. In addition, this analysis considers existing regulations, laws and standards that serve to avoid or reduce potential environmental impacts. Where significant impacts remain, feasible mitigation measures are recommended, where warranted, to avoid or lessen the Project's significant adverse impacts.

Based on the subsection of § 15064.3, Determining the Significance of Transportation Impacts, CEQA provides guidance on how VMT from various types of projects can be evaluating. These four categories or projects and explanation of methodology is provided below under subheading b) to correspond with the CEQA guidelines section.

- b) Criteria for Analyzing Transportation Impacts.

1. **Land Use Projects.** VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.
2. **Transportation Projects.** Transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, a lead agency may tier from that analysis as provided in § 15152.
3. **Qualitative Analysis.** If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze a Project's VMT qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
4. **Methodology.** A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in § 15151 shall apply to the analysis described in this section.

The traffic memorandum for VMT prepared by Kimley-Horn for the Project was completed on August 7, 2020 and is included as **Appendix K** of this EIR. The analysis below utilizes the VMT significance criteria to determine the significance of Project-generated trip impacts and whether mitigation is required.

City VMT Thresholds

The City of Beaumont staff report for SB 743 VMT Thresholds for CEQA Compliance Related to Transportation Analysis (June 16, 2020) recommends VMT thresholds consistent with the RTP/SCS future year VMT by jurisdiction as described below:

The portions of the RTP/SCS that affect Beaumont are based on the land use element of the General Plan. As such, using this option assumes that projects consistent with the General Plan are also consistent with the RTP/SCS and should not require additional analysis for VMT. Projects that require amendment to the General Plan that would trigger an EIR would need to complete a VMT analysis using the methodology described above as discussed under the SB 743 heading and repeated below.

- Utilizing the Riverside County Travel Demand Model (RIVTAM/RIVCOM) as its methodology to measure VMT.
- Utilizing the Riverside County Travel Demand Model (RIVTAM/RIVCOM) as its method to analyze a project's VMT impact.
- Utilizing a threshold consistent with the City's current average VMT per service population (population plus employment).

Other amendments to the General Plan would need to be evaluated on a case-by-case basis. Rather than the 15 percent reduction in VMT recommended in the OPR guidance, staff is recommending that future projects within the City of Beaumont demonstrate that they will reduce existing VMT by at least three percent. This threshold is appropriate for projects within the City of Beaumont, given that it would create consistency with, and progress the goals of the SCAG RTP/SCS.

Projects that cannot demonstrate a three percent reduction in VMT are required to conduct additional analysis and add mitigation as appropriate. If project design or operational features, or mitigation measures, cannot reduce VMT below the threshold then an EIR may be required in order for the City to consider a statement of overriding considerations.

As the Project related entitlements include a General Plan Amendment, a full VMT analysis has been conducted for the Project consistent with the City of Beaumont guidelines.

3.13.4 PROJECT IMPACTS AND MITIGATION

Impact 3.13-1: Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Level of Significance: Less than Significant Impact

The Project Site is currently vacant and there are no authorized roadway, pedestrian, bicycle, or public transit facilities within or adjacent to the Project Site. Construction of the Project would result in the use of large construction equipment, transportation of equipment to and from the Project Site, worker vehicle trips and possible temporary delays on public roads. The Project Site is adjacent to the southern right-of-way of SR-60 and approximately one mile west of I-10. Within the Project Site, the Warehouse Site would be adjacent to the northerly alignment of the future 4th Street and adjacent to the westerly alignment of the Potrero Boulevard extension. Both roadways have been planned to be extended and the Project would make a fair share contribution and right-of-way dedication as required by the City.

Construction of the Project would alter the site and result in the construction of a new 577,992 sf warehouse. Construction would include the installation of new ingress and egress, and interior parking, and interior driveways and 360-degree emergency lane.

The proposed warehouse and roadways have been designed and would be constructed to be responsive to the goals and policies from the Land Use and Community Design and Mobility elements of the City of Beaumont GP that pertain to the circulation system. The Project's land use and circulation elements would be consistent with the requirements pertaining to the overall transportation and circulation system,

including transit, roadway, bicycle and pedestrian facilities, elements that are included as part of the proposed roadway improvements. Potrero Boulevard is shown as an Urban Arterial Highway which are shown to contain three traffic lanes, a 10-foot wide bike lane and 6-foot wide sidewalk. 4th Street is shown as either a major Highway A or B, each of which would have two vehicle travel lanes, a 6-foot wide bike lane and 6-foot wide sidewalk.

The design of the Project considers and includes requirements needed to comply with applicable traffic and circulation regulations and guidance set forth by the City. As discussed above, the Project Site is adjacent to and would use both Potrero Boulevard and 4th Street for primary access of worker vehicles and trucks using the facility.

All roadway, pedestrian, and bicycle improvements would occur within areas that are proposed to be disturbed as part of the construction of the Project Site and impacts are, therefore, included in the analysis in the respective chapters of this document. Therefore, the proposed improvements would adhere to all relevant circulation regulations and be consistent with policy and planning document guidance related to needed improvements. Adherence to these planning directives and incorporation of the associated improvements would have a less than significant impact on the environment.

Mitigation Measures

No mitigation measures are required.

Impact 3.13-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Level of Significance: Significant and Unavoidable Impact

As discussed above, comprehensive updates to CEQA and the State CEQA Guidelines require projects to use VMT to determine project impacts. The VMT impact analysis for the Project is presented below.

VMT Analysis

To evaluate the VMT, the major trip purposes of the site and trip length and frequency were considered. Given the type of project, three types of trips are at issue: (1) employee commute trips; (2) truck trips related to shipping activities; and (3) other trips related to functioning of the business and/or its employees. The following discussion provides additional detail regarding these three broad trip types.

- (1) **Employee commute trips**. These are the primary automobile trips associated with employment generating uses such as the Project. The Project facility is expected to provide additional jobs and some related trips to the area. The efficiency of VMT associated with employee commute trips was assessed based on Riverside County Travel Demand Model consistent with the City's guidelines, which is provided further below.
- (2) **Truck trips related to shipping activities**. CEQA Guidelines § 15064.3, subdivision (a), states "For the purposes of this section 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." The OPR's 2018 Technical Advisory indicates that, although heavy

vehicle traffic can be included for analysis convenience, VMT analysis requirements are specific to passenger-vehicles and light duty trucks. Further, interstate commerce and related heavy vehicle traffic are regulated by the federal government and protected under the Commerce Clause of the United States Constitution. In addition, most often, businesses who have shipping as a significant part of their operations are sensitive to transportation costs and their relative proximity to customers and suppliers. Accordingly, it is reasonable to assume that warehouses are often located in a manner to reduce VMT given that it is the interest of the business. It is also recognized that the Project would generate Heavy Duty Truck (HDT) traffic and has been considered in this VMT assessment. For consistency with other CEQA technical studies, HDT VMT identified in this analysis will be reflected in other applicable technical studies (e.g., Air Quality Impact Analysis, Greenhouse Gas Emissions Analysis, etc.). This provides an extremely conservative analysis, given that VMT associated with heavy duty truck trips is not required to be analyzed under CEQA.

(3) Other trips related to functioning of the business and/or its employees. These types of trips are typically fewest and cover the shortest distance of trips generated by a warehouse and logistics facility and the overall contribution to VMT is typically minimal. Although few, these trips can include a wide range of trip types, such as, employee lunches off-site, maintenance teams for on-site infrastructure, office supply deliveries, etc. Additionally, because these account for a relatively small number of trips, they are not generally considered impactful to the local transportation system and are secondary to the other employee commute trips and truck trips related to shipping activities. The efficiency of VMT associated with this “other trips” category has also been assessed based on Riverside County Travel Demand Model consistent with the adopted City’s guideline.

Project VMT

The calculation of VMT has two components – the total number of trips generated and the average trip length of each vehicle. The Riverside County Travel Demand Model can be used to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households and employment. Project VMT was calculated using the most current version of Riverside County Travel Demand Model. Adjustments in socio-economic data (households, population and employment) were made to the appropriate traffic analysis zone (TAZ) within the Riverside County Travel Demand Model to reflect the Project’s proposed land use. Socio-economic data inputs were derived based on Riverside County General Plan, Appendix E-2: Socioeconomic Build-out Assumptions and Methodology.

Project Home-Based Work (HBW) VMT per Employee. The HBW VMT per employee is the HBW attraction VMT divided by the number of employees derived from the Riverside County Travel Demand Model. The HBW VMT per Employee is used to measure efficiency of VMT generated by employment-based uses. The Project HBW VMT per Employee calculated based on Riverside County Travel Demand Model is 16.34.

Project VMT per Service Population. Service population is defined as the sum of population and employment. Since the Project does not have any residential component, the Project service population consists of employees only. The VMT per service population is the total VMT (including all trip purposes) divided by the number of workers derived from the Riverside County Travel Demand Model. The VMT per

service population is used to measure efficiency of VMT generated by all trip purposes. The Project VMT per service population calculated based on Riverside County Travel Demand Model is 32.1.

Heavy Truck VMT. Consistent with the assumptions made in the air quality and greenhouse gas emissions analyses prepared for this Project, the average trip length for heavy trucks is based on the data provided in Forecasting Metropolitan Commercial and Freight Travel (NCHRP Synthesis 384, Transportation Research Board, 2008) document. The document cites average internal trip lengths of 5.92 miles for light truck, 13.06 miles for medium truck, and 24.11 miles for heavy trucks. As a conservative measure, a trip length of 25 miles has been utilized for all trucks multiplied by the daily truck trips (476) estimated in the TIA based on Institute of Transportation Engineer (ITE) trip rates, resulting in a heavy truck daily VMT of 11,900. Again, as noted above, CEQA does not require VMT analyses include heavy duty truck trips.

For purposes of this VMT assessment the Project's HBW VMT per Employee and VMT per service population (SP) has been compared to three percent below citywide average future year (2040) VMT for the City of Beaumont, based on data provided by WRCOG. **Table 3.13-1: VMT Thresholds** shows the calculated VMT thresholds for HBWVMT per Employee and VMT per SP:

Table 3.13-1 VMT Thresholds

| Threshold Option | Citywide Average | Threshold (3% below) |
|-----------------------------------------|------------------|----------------------|
| Future Year (2040) HBW VMT per employee | 9.2 | 8.9 |
| Future Year (2040 VMT per SP) | 31.3 | 30.4 |

As shown in **Table 3.13-2: VMT Impact Evaluation**, the Project's HBW VMT per Employee and VMT per SP would not meet the three percent below citywide future year threshold. As such, the Project's transportation impact is potentially significant based on the City of Beaumont's chosen threshold.

Table 3.13-2 VMT Impact Evaluation

| Threshold Option | Threshold | Project | Change in VMT | Potentially Significant? |
|------------------|-----------|---------|---------------|--------------------------|
| HBW VMT Employee | 8.9 | 16.34 | +7.44 | Yes |
| VMT per SP | 30.4 | 32.1 | +1.7 | Yes |

The Project's transportation impact is potentially significant based on City of Beaumont's recommended thresholds. Therefore, Mitigation Measure (MM) TRAN-1 has been identified, which encourages the use of TDM Strategies to reduce impacts. The effectiveness of the listed TDM measures would be dependent on the final building tenant(s), which are unknown at this time. Beyond a project's design and tenancy considerations, land use context is a major factor relevant to the potential application and effectiveness of TDM measures. Thus, improvements to pedestrian networks, implementation of traffic calming infrastructure, low-street bicycle network improvements, telecommuting, and the promotion of ride share programs would be viable mitigation measures, and would encourage multi-passenger modes of transportation which would in turn reduce VMT.

While this TDM strategy is anticipated to reduce some VMT generated by the Project, it is not possible to know specifically to what exact extent such measures would actually reduce VMT at the Project Site. This is in part due to the fact that the end user tenant of the Warehouse Site is unknown at this time, and also

in part due to the suburban nature of the City of Beaumont and the surrounding region. However, the VMT estimates provided in this analysis are produced from reliable modeling and research and are based on the best available information. Nonetheless, it would be speculative to state the TDM measures would be guaranteed to reduce VMT to less than the City's significance threshold.

The City is also unaware of any further mitigation measures that would feasibly reduce VMT beyond those identified above as part of the TDM strategy. Due to limitations of project-level approaches to reducing VMT, a City or region may consider larger mitigation programs such as VMT mitigation banks and exchanges. VMT mitigation banks and exchanges have not yet been developed or tested. WRCOG is undertaking a study to evaluate the feasibility of a VMT mitigation bank or exchange in order to assist lead agencies in implementing SB 743. The Project would, therefore, defer to the efforts of WRCOG and would not create or implement a Project-specific VMT mitigation bank.

Given the above described inability to ensure that MM TRAN-1 would reduce impacts to below the City's significance threshold, and a lack of further feasible mitigation measures, the Project's VMT impact is considered significant and unavoidable.

Mitigation Measures

MM-TRAN-1: Prior to final Project approval, the Project applicant and City shall develop a cooperative plan of implementation through a fair share contribution from the Project applicant (or other mechanism) to the City to enable the establishment or enhancement of programs within the City that would reduce VMT. The Project applicant and City shall work cooperatively, to develop effective transportation demand management (TDM) strategies that would be included in site plans and Project operations. The TDM strategies shall be employed as applicable by the Project applicant in conjunction with the City, to reduce the overall VMT resulting from Project implementation. The following strategies shall be considered, but other TDM measures, if feasible may be implemented:

- Improving pedestrian networks;
- Implementing traffic calming infrastructure;
- Provide bicycle parking and secure bike lockers;
- Alternative work scheduling;
- Public transit benefit;
- Building low-street bicycle network improvements;
- Encouraging alternative work schedules;
- Telecommuting; and
- Providing ride-share programs.

Level of Significance After Mitigation: Significant Unavoidable Impact

The Project's VMT impacts are considered significant and would remain significant and unavoidable even after all feasible mitigation is included. Although the mitigation measure is anticipated to reduce VMT and potential impacts, the specific value cannot be guaranteed, due to the nature of the Project as a logistics and distribution warehouse, the fact that the end-user Project tenant would not be identified until after construction of the Project, and given the land use context surrounding the Project. Further, although MM MM TRAN-1 provides a number of incentives to reduce the number of employee trips, it is unknown to what extent individuals would utilize those alternatives. Therefore, no other feasible mitigation is available that would reduce VMT.

Impact 3.12-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Level of Significance: Less than Significant Impact

The Project would not create a significant traffic-related safety hazard. The Project roadways, ingress and egress, and interior circulation elements have been designed and would be constructed consistent with the City's Department of Public Works Department standard drawings. There are no incompatible land uses proposed or in the vicinity of the Project Site, such as those utilizing farm equipment, that would result in a potential significant traffic safety hazard. Although construction would involve the use of large heavy-duty equipment such as rollers, graders, and dump trucks, all staging and construction areas would have appropriate signage and standard safety protocols as implemented by the Project Applicant through standard construction practices. To further reduce potential impacts during site improvements as needed, construction flagmen and/or signage would be used along 4th Street and Potrero Boulevard to ensure safe construction practices. Therefore, potential impacts associated with design hazards would be less than significant.

Impact 3.13-4: Would the project result in inadequate emergency access?

Level of Significance: Less than Significant Impact

Project access is proposed via two driveways: one on Potrero Boulevard and one on 4th Street. Emergency access lanes would be provided around the perimeter of the building. Emergency access would be provided in accordance with Beaumont MC § 17.05.060C – Emergency Access. Metal, manual operated gates with Knox-Padlock would be provided at each driveway per Riverside County Fire Department (RCFD) Standards. Curbs would be painted, and signage provided to inform of the fire lanes, as required by the RCFD. The RCFD would review the Project for access requirements concerning minimum roadway width, fire apparatus access roads, fire lanes, signage, access devices and gates, and access walkways, among other requirements, which would enhance emergency access to the Project site. Following compliance with RCFD access requirements, adequate emergency access to the Project site would be provided. Project impacts concerning emergency access would be less than significant and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

3.13.5 SIGNIFICANT UNAVOIDABLE IMPACTS

The Project would not conflict with any applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The Project also would not include a roadway design features that would create a hazard or hazardous roadway condition. The proposed Project; however, would generate VMT in excess of the City's VMT threshold, and even with mitigation requiring a TDM plan, impacts would not be reduced to less than significant.

3.13.6 CUMULATIVE IMPACTS

Construction activities associated with the Project and nearby cumulative projects may overlap and result in temporary traffic impacts to local roadways. However, the Project would not result in significant traffic related impacts resulting from conflicts with transportation plans or policies and is consistent with all applicable Beaumont General Plan policies such as working with Caltrans, making needed roadway improvements, etc. Cumulative development projects would also be required to reduce construction traffic impacts on the local circulation system and implement any required mitigation measures that may be prescribed pursuant to CEQA provisions. Therefore, the Project contribution to impacts in these regards would be less than significant.

Under Impact Statement 3.13-2, the Project's cumulative impact to regional Total VMT would result in an increase of 1.7 VMT per SP; refer to **Table 3.13-2**. As such, the Project results in a net increase in VMT per SP, and the Project's cumulative effect on VMT is potentially significant. As analyzed above, MM TRAN-1 ensures the implementation of TDM measures with the potential to reduce VMT impacts, although not to a level of less than significant. While it is anticipated the City would require similar mitigation of cumulative projects in the vicinity, the Project's cumulative VMT impacts are considered significant and unavoidable.

3.13.7 REFERENCES

City of Beaumont. (2020). *Staff Report: SB 743 Vehicle Miles Traveled (VMT) Thresholds for California Environmental Quality Act (CEQA) Compliance Related to Transportation Analysis*. Retrieved from: <https://mccmeetingspublic.blob.core.usgovcloudapi.net/beaumntca-meet-f1da32f813d04b548d03815d09f7fef6/ITEM-Attachment-004-92c35ec0a7a44ac195e79254290997ac.pdf>.

Kimley-Horn. 2020. *Traffic Impact Study for Beaumont Potrero Interchange Industrial Warehouse*, January.

Kimley-Horn. 2020. *Supplemental Vehicle Miles Traveled Analysis for Beaumont Potrero Interchange Industrial Warehouse Project*, August.