# EXHIBIT R
# Vehicle Miles Travelled (VMT) Analysis

Fresno Council of Governments

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# Proposed Starbucks at the Southeast quadrant of Tulare Street and "R" Street in the City of Fresno (JLB Project 004-178)

**VMT Analysis for the proposed Starbucks at the Southeast quadrant of Tulare Street and "R" Street in the City of Fresno (JLB Project 004-178):**

| S. No. | Scenario | Total VMT | Net Change |
|---|---|---|---|
| 1 | Fresno County Total VMT without project | 23,479,509 | |
| 2 | Fresno County Total VMT with project | 23,234,259 | -245,250 |

City of Clovis
City of Coalinga
City of Firebaugh
City of Fowler
City of Fresno
City of Huron
City of Kerman
City of Kingsburg
City of Mendota
City of Orange Cove
City of Parlier
City of Reedley
City of San Joaquin
City of Sanger
City of Selma
County of Fresno

# Vehicle Miles Traveled Analysis

## Starbucks with Drive-Through Window

**Located at 2840 Tulare Street**

**In the City of Fresno, California**

***Prepared for***
MB Developers, LLC.
416 E South Avenue
Fowler, CA 93625

October 5, 2022

Project No. 004-178


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*Traffic Engineering, Transportation Planning, & Parking Solutions*

# Vehicle Miles Traveled Analysis

## For Starbucks with Drive-Through Window located at 2840 Tulare Street

In the City of Fresno, California

October 5, 2022

This Vehicle Miles Traveled Analysis has been prepared under the direction of a licensed Traffic Engineer. The licensed Traffic Engineer attests to the technical information contained therein and has judged the qualifications of any technical specialists providing engineering data from which recommendations, conclusions and decisions are based.

Prepared by:

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President

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# Project Description

This report describes a **Vehicle Miles Traveled Analysis (VMT) Analysis** prepared **by JLB Traffic Engineering, Inc. (JLB)** for the **Starbucks with Drive-Through Window (Project)** located at 2840 Tulare Street in the City of Fresno. The Project proposes to develop the site with a 2,406 square foot Starbucks. Based on information provided to JLB, the Project is consistent with the City of *Fresno General Plan*. A Project Site Plan is shown in Appendix A.

# VMT Analysis

## Regulatory Setting

Senate Bill (SB) 743 requires that relevant California Environmental Quality Act (CEQA) analysis of transportation impacts be conducted using a metric known as VMT instead of level of service (LOS). VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

The State CEQA Guidelines were amended to implement SB 743, by adding Section 15064.3. Among its provisions, Section 15064.3 confirms that, except with respect to transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, LOS measures of impacts on traffic facilities are no longer a relevant CEQA criteria for transportation impacts.

CEQA Guidelines Section 15064.3(b)(4) states that "[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 revision to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section."

On June 25, 2020, the City of Fresno adopted guidelines or thresholds for VMT pursuant to Senate Bill 743 to be effective July 1, 2020. The thresholds are described within the City of Fresno *CEQA Guidelines for Vehicle Miles Traveled Thresholds* referred to herein as the City of Fresno VMT Thresholds. The City of Fresno VMT Thresholds document was prepared and adopted consistent with the requirements of CEQA Guidelines Sections 15064.3 and 15064.7. The December 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (TA) published by the Governor's Office of Planning and Research (OPR), was utilized as a reference and guidance document in the preparation of the Fresno VMT Thresholds.

The City of Fresno VMT Thresholds adopted a screening standard and criteria that can be used to screen out qualified development projects that meet the adopted criteria from needing to prepare a detailed VMT Analysis. These criteria may be size, location, proximity to transit, of trip making potential. In general development projects that are consistent with the City's General Plan and Zoning and that that meet one or more of the following criteria can be screened out from a quantitative VMT analysis.

1. Project Located in a Transit Priority Area/High Quality Transit Corridor (within 0.5 miles of a transit stop).
2. Project is Local-serving Retail of less than 50,000 square feet.
3. Project is a Low Trip Generator (Less than 500 average daily trips)
4. Project has a High Level of Affordable Housing Units
5. Project is an institutional/Government and Public Service Uses
6. Project is located in a Low VMT Zone

This screening tool is consistent with the OPR December 2018 Guidance referenced above. The screening tool includes an analysis of those portions of the City that satisfy the standard of reducing VMT by 13% from existing per capita and per employee VMT averages within the relevant region. The relevant region adopted by the City of Fresno VMT Thresholds is Fresno County.

However, the City of Fresno VMT Thresholds Section 3.1 regarding Development Projects states that "If a project constitutes a General Plan Amendment (GPA) or a Zone Change (ZC), none of the screening criteria may apply".

For projects that are not screened out, a quantitative analysis of VMT impacts must be prepared and compared against the adopted VMT thresholds of significance. The Fresno VMT Thresholds document includes thresholds of significance for development projects, transportation projects, and land use plans. These thresholds of significance were developed using the County of Fresno as the applicable region, and the required reduction of VMT (as adopted in the City of Fresno VMT Thresholds) corresponds to Fresno County's contribution to the statewide GHG emission reduction target. In order to reach the statewide GHG reduction target of 15%, Fresno County must reduce its GHG emissions by 13%. The method of reducing GHG by 13% is to reduce VMT by 13% as well.

VMT is simply the product of a number of trips and those trips' lengths. The first step in a VMT analysis is to establish the baseline average VMT, which requires the definition of a region. The *CEQA Guidelines for Vehicle Miles Traveled Thresholds* for the City of Fresno provide that the Fresno County average VMT per Capita (appropriate for residential land uses) and Employee (appropriate for office/commercial non-retail land uses) are 16.1 and 25.6, respectively. The City's threshold targets a 13% reduction in VMT for residential and office/commercial non-retail land uses.

The City's adopted thresholds for development projects correspond to the regional averages modeled by Fresno COG's ABM. For residential and non-residential (except retail) development projects, the adopted threshold of significance is a 13% reduction, which means that projects that generate VMT in excess of a 13% reduction from the existing regional VMT per capita or per employee would have a significant environmental impact. Projects that reduce VMT by 13% or more are less than significant. For retail projects, the adopted threshold is any net increase in Regional VMT compared to the existing Regional VMT.

The target VMT for this Project, which contains only the retail land use, is a net zero (0) increase in Regional VMT.

## VMT Screening

The City of Fresno VMT Threshold states that a local-serving retail of less than 50,000 square feet that is consistent with the City of Fresno *General Plan* can be screened from a quantitative VMT analysis if it can be demonstrated that the project is a local serving Project. In this case, the Project consists of 2,406 square feet of coffee/donut shop with drive-through window. Starbucks currently has three (3) existing locations within a 0.5-mile radius of the proposed Project. Two of these locations are located adjacent to the State Route 41 interchange at Tulare Street/Divisadero Street, serving local as well as occasional pass-by traffic off State Route 41. The third location does not have a drive-through and is located near the center of downtown, at the southwest quadrant of Tulare Street and "N" Street. The purpose of this new location is to target the large, underserved population in the Southeast area of downtown Fresno. This location is less than a mile from the Fresno County Superior Court, Fresno City Hall, Community Regional Medical Center and the Amtrak Train Station. In addition to the downtown locations, this Project is targeting several residential neighborhoods in close proximity to the new site, including the MLK and Church area 2.13 miles to the west and the Orange and Kings Canyon area 1.20 miles to the east. Another unique characteristic of the new location is the opportunity to be neighbors with the only full-size neighborhood grocery store in downtown Fresno.

The projected service area of the Project was developed based on existing locations of similar land uses, engineering judgement and knowledge of the City of Fresno Circulation Element. There is a total of eight (8) existing Starbucks and one (1) new Starbucks, opening at Kings Canyon Road and Chestnut Avenue before this new location opens, within a 4.5-mile radius of the Project site. A person looking to purchase a product from a Starbucks will generally travel to the closest available location. Therefore, no one would need to travel further than 2.25 miles (4.5 miles / 2 = 2.25 miles) in this area. The average trip is further reduced as the closest Starbucks north of the Project is 0.5 miles away (projected to serve customers located north of Huntington Boulevard), the closest Starbucks south of the Project is 3.25 miles away (projected to serve customers located south of California Avenue) and the closest Starbucks east of the Project is 2.50 miles away (projected to serve customers located east of 9$^{th}$ Street). Appendix B illustrates the location of the Project site, its proximity to other currently existing Starbucks within its vicinity and the projected service area of the Project. The projected service area proves that the Project will be local serving. It should also be noted that Starbucks is currently working on opening an additional location in the vicinity of the intersection of Martin Luther King Boulevard and Church Avenue. This location is approximately 2.13 miles west of the Project site and will further decrease the projected service area of the Project.

Local-serving retail projects of less than 50,000 square feet can be screened out of a Quantitative VMT analysis pursuant to the City of Fresno VMT Thresholds and this Project contains 2,406 square feet of local-serving retail. This Project can be classified as local-serving as it has a relatively small projected service area between 0.25 miles to 2.50 miles and there are additional Starbucks locations that serve the nearby freeway. As a result, this Project can be presumed to have less than significant VMT impacts and should be screened out of any further VMT Analysis.

## Conclusion

The Project contains a total building area of 2,406 square feet of retail which seeks to primarily serve a large underserved population within Downtown Fresno, with a maximum service area of 0.25 to 2.5 miles. As a result, this Project should be considered a local serving retail project for purposes of it being screened out from a quantitative VMT Analysis. Any developments containing less than 50,000 square feet of local serving retail and consistent with the City of Fresno *General Plan* can be screened out from a quantitative VMT analysis pursuant to the City of Fresno VMT analysis guidelines.

- The Project seeks to service an underserved population within downtown Fresno.
- The Project will serve to a maximum service area of 0.25 to 2.5 miles
- The Project contains 2,406 square feet of local-serving retail that is consistent with the City of Fresno General Plan
- Per the City of Fresno VMT analysis guidelines, local-serving retail projects under 50,000 square feet and that are consistent with the City of Fresno *General Plan* are screened out from a VMT analysis
- The Project will primarily serve the local community near and around Downtown Fresno, and as a result, can be presumed to have less than significant VMT impacts and should be screened out from a Quantitative VMT analysis.

# Study Participants

**JLB Traffic Engineering, Inc. Personnel:**

| | |
|---|---|
| Jose Luis Benavides, PE, TE | Project Manager |
| Carlos Ayala-Magaña, EIT | Engineer I/II |
| Matthew Arndt, EIT | Engineer I/II |
| Jove Alcazar, EIT | Engineer I/II |
| Javier Rios | Engineer I/II |
| Dennis Wynn | Sr. Engineering Technician |
| Adrian Benavides | Engineering Aide |
| Christian Sanchez | Engineering Aide |

**Persons Consulted:**

| | |
|---|---|
| Nathan Simpson | Commercial Retail Associates, Inc. |
| Chelsey M. Skooglund | MB Developers, LLC |

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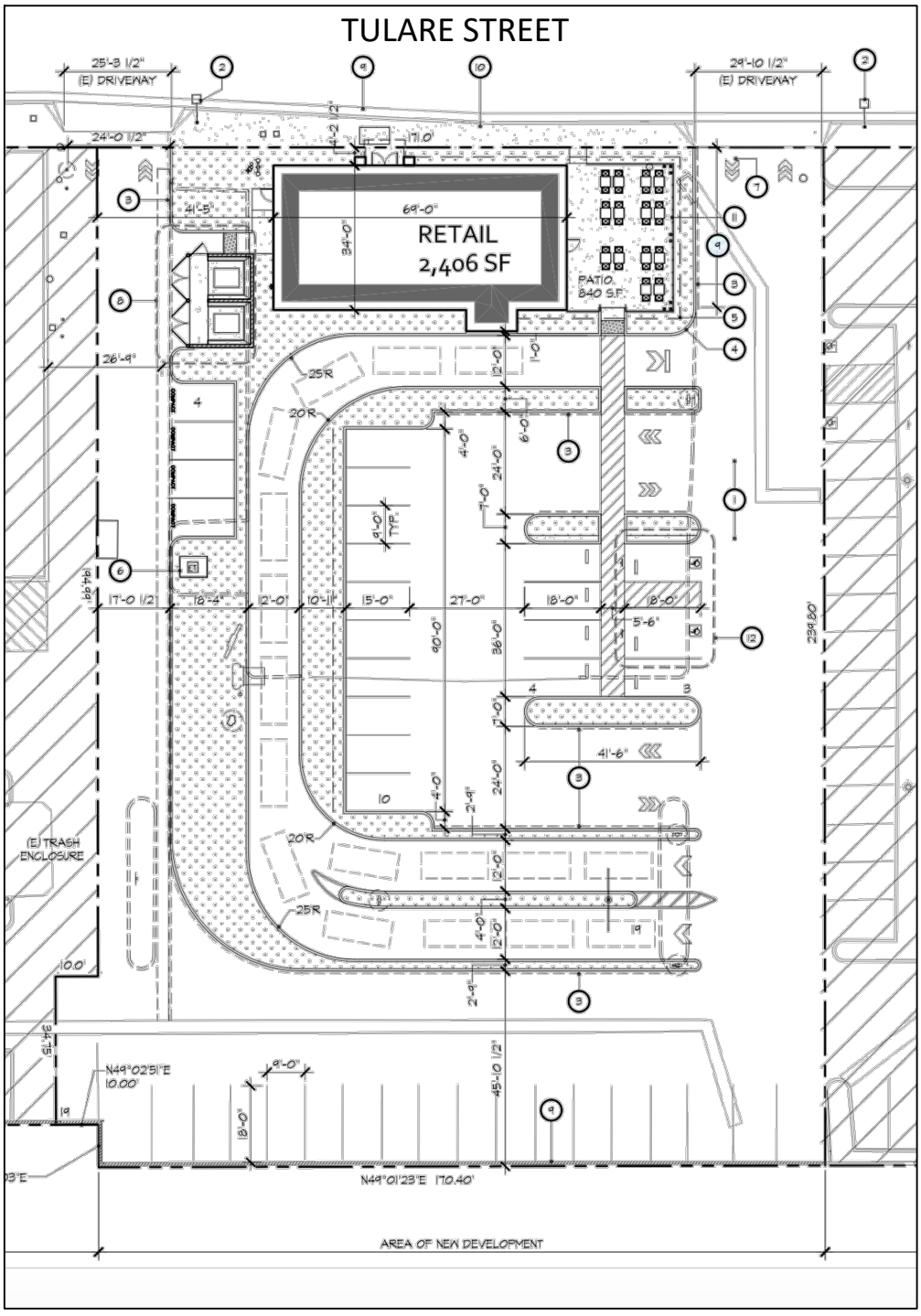


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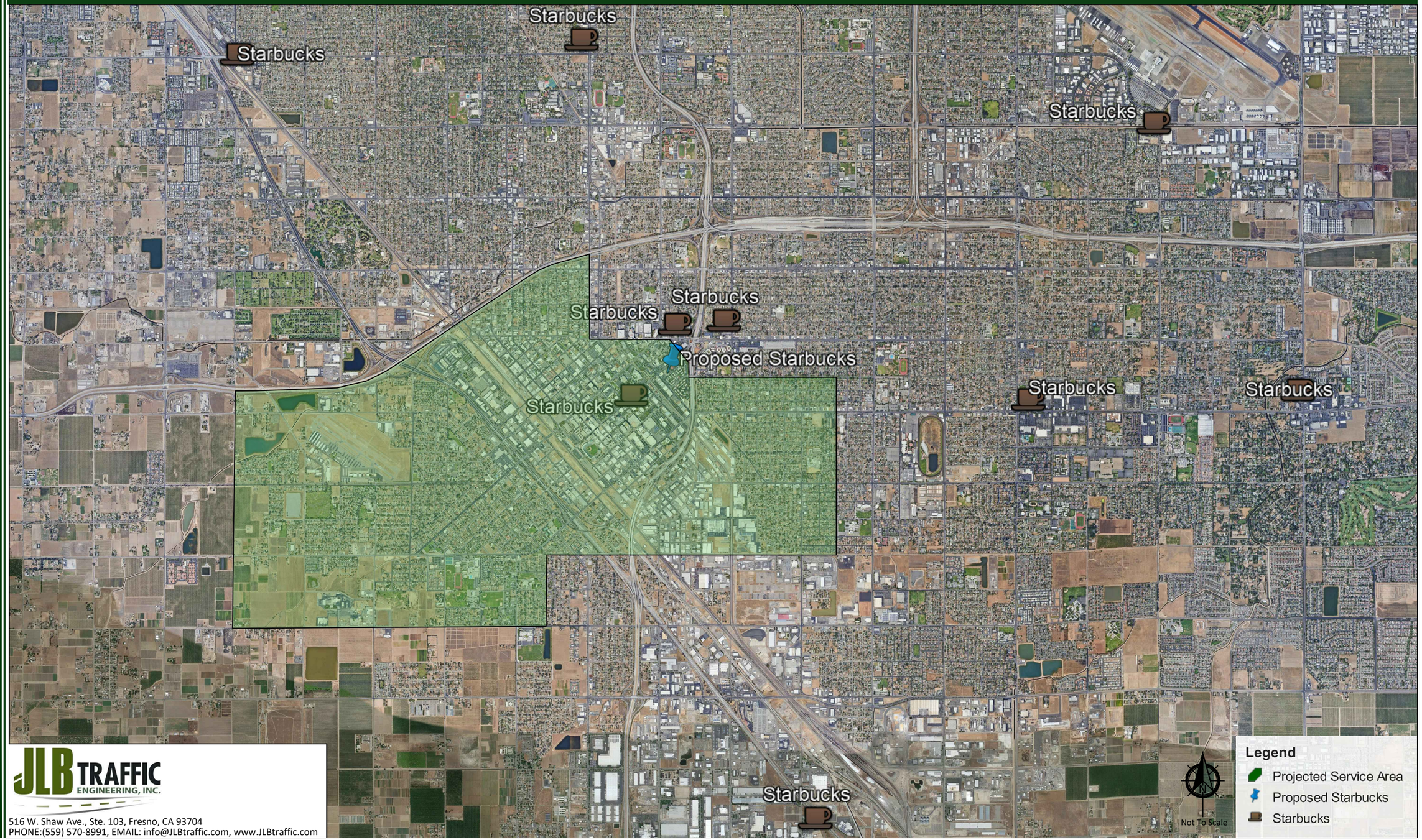
Not To Scale

Tulare Street and R Street Proposed Starbucks- City of Fresno
Projected Service Area

Appendix B

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