

ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

Date: July 15, 2021
Prepared by: Meghan Macias, TE
To: Giancarlo Ganddini, PE, PTP
Ganddini Group, Inc.
Site: Wonder Inn Hotel Project
EPD Project Number 21-082
Subject: Vehicle Miles Traveled (VMT) Analysis



This memo evaluates the potential vehicle miles traveled for the Wonder Inn project located in unincorporated San Bernardino County. The 134.6-acre project site is located at 78201 Amboy Road in the unincorporated Wonder Valley community. The project site is located east of Twentynine Palms and is approximately 11 miles from the entrance to Joshua Tree National Park. There is a 4,235 SF commercial building on the project site, which was formerly used as a post office. The project location is shown in Figure 1.

The proposed project would redevelop the site into a retreat-style hotel. The existing commercial building would be utilized as a lobby and four new buildings would provide a total of 106 guest rooms. A variety of amenities will be provided including a swimming pool, on-site restaurant, picnic area, event space, spa, volleyball and yoga areas, and an astronomy observation amphitheater. Access to the project site would be provided via two existing driveways on Amboy Road. A third driveway will be constructed for Emergency Vehicle Access (EVA) three hundred feet west of the existing east driveway. The project site plan is shown in Figure 2.

A Trip Generation and Vehicle Miles Traveled Screening Assessment was prepared for the project by Ganddini Associates dated May 19, 2021 (attached). According to the VMT screening, the project would not satisfy any of the County VMT screening criteria. The project was therefore analyzed for VMT impacts using SBTAM. This technical memorandum summarizes the findings of the VMT analysis.

Background

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating Transportation impacts. SB743 specified that the new criteria should promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. The bill also specified that delay-based level of service could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3 - Determining the Significance of Transportation Impacts states that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

VMT Analysis Methodology

The San Bernardino County Transportation Impact Study Guidelines (July 19, 2019), provide analysis methodology and thresholds for preparation of a VMT analysis. Per the VMT guidelines, a project would be considered to have a significant impact if the project VMT per employee/person is greater than 4% below

the existing VMT per employee/person for the unincorporated County. The project would generate two types of trips that would need to be included in the VMT analysis: 1) Home-based work trips generated by project employees and 2) Visitor trips.

To evaluate the project, EPD input the project employment into the project traffic analysis Zone (TAZ 53993201) in the San Bernardino Transportation Analysis Model (SBTAM). The model was run for the base year (2016) and future year (2040) conditions. EPD evaluated the 2016 and 2040 VMT for the project TAZ using the production/attraction (PA) home-based work (HBW) trips output from with project SBTAM model runs. The model was also run for 2016 and 2040 conditions without the project. To determine the VMT threshold, VMT for unincorporated San Bernardino County zones was calculated using the production/attraction (PA) home-based work (HBW) trips output from the without project SBTAM model runs. The PA HBW trips were multiplied by the trip lengths to determine the VMT. The HBW VMT was divided by the employment (i.e. number of jobs) for the project TAZ and for unincorporated county TAZs to determine the VMT/Employee.

The Baseline 2021 VMT was calculated using linear interpolation between the 2016 and 2040 VMT. The County's threshold is based on VMT generated in the unincorporated County areas, therefore only VMT generated by TAZs in unincorporated County areas was used to determine the threshold of significance. The VMT threshold calculation is shown in Table 1.

Table 1: VMT Threshold Calculation

	2016	2040	2021	Threshold (4% below 2021)
Unincorporated VMT/Employee	23.18	25.41	23.83	22.88

Per the information provided to EPD, the proposed project would have between 20 and 30 employees. The VMT analysis is based on 30 project employees. The Project VMT/Employee was determined using interpolation between the 2016 and 2040 VMT from the SBTAM Model. Table 2 shows the project VMT/Employee calculation. As shown in Table 2, the 2021 project VMT/Employee would be 22.59, which is less than the threshold of 22.88. Therefore, the project would have a less than significant impact on VMT.

Table 2: Project VMT Impact Evaluation

	2016	2040	2021	Threshold	VMT Impact?
Project VMT/Employee	23.1	20.01	22.59	22.88	No

The project VMT/Employee of 22.59 is less than the threshold of 22.88. Therefore, the project would have a less than significant VMT impact.

Evaluation of Visitor VMT

The SBTAM model does not model visitor travel activity. Therefore, an off-model evaluation of visitor trips was prepared to determine if visitor trips would result in a significant VMT impact. The County's guidelines do not define a significant impact for visitor trips. For purposes of this analysis, a significant impact would occur if the project causes additional visitors to the area resulting in an overall increase in VMT.

Most visits to the Twentynine Palms area are to visit Joshua Tree National Park. Annual visitation to Joshua Tree National Park was approximately 2.9 million visitors in 2017, 2018 and 2019¹. According to the City of Twentynine Palms Retail Market Study prepared May 5, 2017², visitation at Joshua Tree National Park is expected to grow to 4 million persons in the coming years.

When evaluating VMT of visitor serving uses, it should be determined whether the proposed project would serve an existing attraction or area or would create its own attraction that would result in an increase of visitors to the area. As noted above, visitors currently visit the Twentynine Palms area to Visit Joshua Tree National Park and are served by existing hotels in the area. According to the Retail Market Study, the average occupancy of hotels in the Twentynine Palms Area peaks at approximately 78 percent during March and has a low of approximately 50 percent during December and January. The average occupancy was 59.9 percent in 2016. Therefore, there are available rooms for visitors who wish to stay overnight in a hotel, even during peak season. Because there is hotel availability during both peak and typical times, there is not a latent demand for travel to the Twentynine Palms/Joshua Tree National Park area which cannot be accommodated by existing lodging. Therefore, the increase in lodging availability would not increase trips to the area.

The hotel would provide on-site amenities such as dining, a swimming pool, yoga, etc. There are other resorts and retreat centers in the area that provide dining, swimming and yoga/meditation retreats, therefore these amenities would not be an attraction by themselves. Rather, it is the combination of the on-site amenities and proximity to Joshua Tree National Park that will attract visitors to the project. For these reasons, the on-site amenities are not likely to attract visitors who were not previously planning a trip to the area.

Because of the existing hotel capacity and resort amenities in the Twentynine Palms area, construction of the project would not result in a significant number of new visitors to the Twentynine Palms/Joshua Tree National Park area but would instead divert existing visitors from other lodging choices. Overall VMT would not increase as a result of the project and therefore VMT impacts due to visitors would be less than significant.

Summary and Conclusions

The home-based work VMT was evaluated using the SBTAM traffic model. Home-based work trips were analyzed for 2016 and 2040 both without and with the project. Year 2021 conditions were interpolated using 2016 and 2040 data. The 2021 project VMT/Employee was calculated as 22.59 VMT/Employee, less than the calculated threshold of 22.88 VMT/Employee. Therefore the project would have a less than significant impact on home-based work VMT.

Visitor VMT was evaluated using existing hotel capacity in the Twentynine Palms/Joshua Tree National Park area. The average occupancy of hotels in the Twentynine Palms Area peaks at approximately 78 percent during March and has a low of approximately 50 percent during December and January. Because hotels in the area currently have adequate vacancy, construction of new hotel rooms would not cause additional visitor travel to the area, which is primarily driven by visitors to Joshua Tree National Park. Because the project would not induce additional travel to the area, visitor VMT impacts would be less than significant.

If you have any questions, please feel free to contact me at meghan@epdsolutions.com or at (949) 794-1186.

¹ <https://www.nps.gov/jotr/learn/management/statistics.htm>

² <https://www.ci.twentynine-palms.ca.us/retailmarketstudy>

Figure 1: Project Location

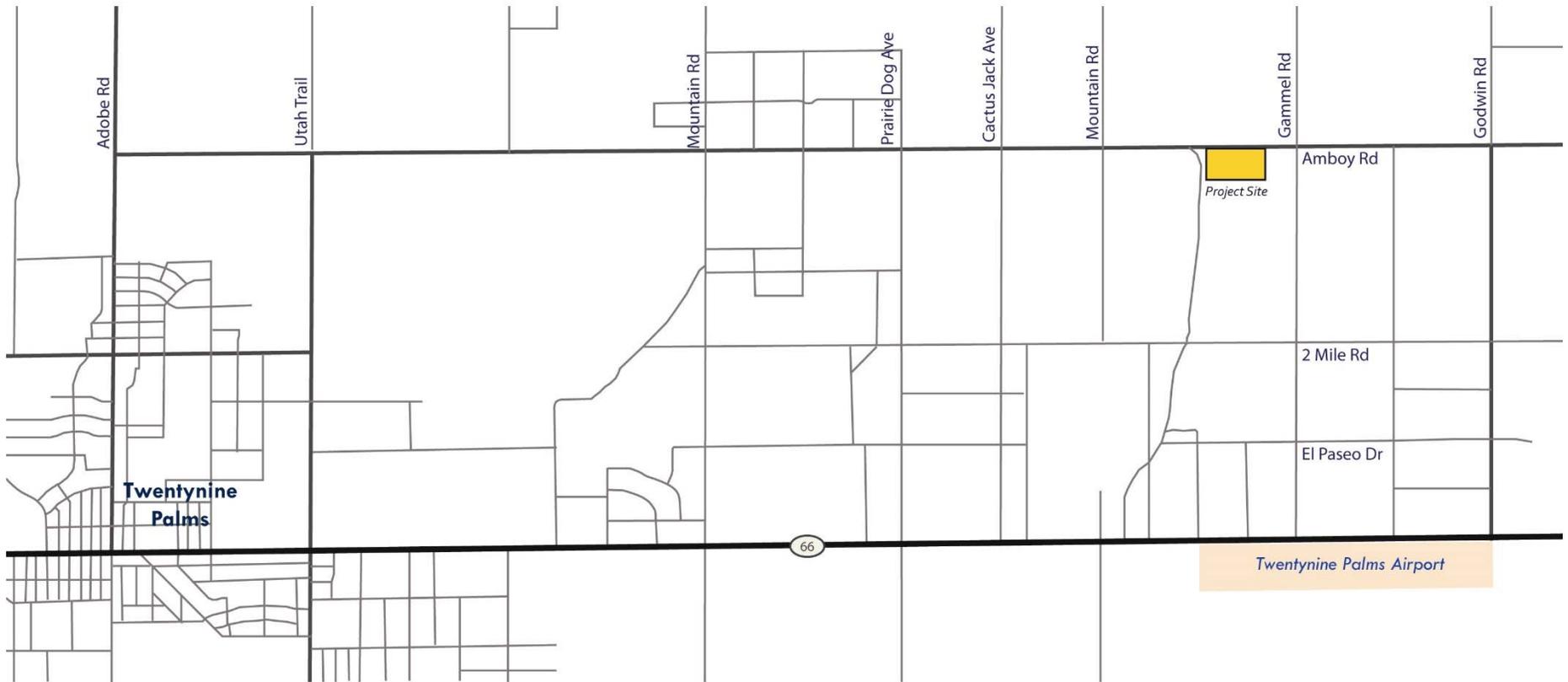


Figure 2: Project Site Plan

