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September 2, 2020

Ms. Tracy Zinn
T&B Planning, Inc.
3200 El Camino Real, Suite 100
Irvine, CA 92602

SUBJECT: SLOVER INDUSTRIAL CENTER VEHICLE MILES TRAVELED (VMT) ANALYSIS

Dear Ms. Tracy Zinn:

The following VMT Analysis has been prepared for the proposed Slover Industrial Center development (**Project**) which is located south of Slover Avenue and west of Juniper Avenue in the City of Fontana.

PROJECT DESCRIPTION

The Project is proposed to consist of a single building with 115,719 square feet of warehousing use and 20,421 square feet of high-cube cold storage warehousing use (15% of the overall 136,140 square foot building).

Trip generation rates used for this assessment are based upon information collected by the Institute of Transportation Engineers (ITE) as provided in their Trip Generation Manual (10th Edition, 2017). (1) The ITE Trip Generation Manual is a nationally recognized source for estimating site specific trip generation.

As shown in Attachment A, the proposed Project is anticipated to generate 204 trip-ends per day (also referred to as daily trips), with 18 trips generated during the AM peak hour and 22 trips generated during the PM peak hour.

BACKGROUND

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December of 2018) (**Technical Advisory**). (2) Based on OPR's Technical Advisory, the San Bernardino County Transportation Authority (SBCTA) prepared the SBCTA Countywide SB 743 VMT Implementation Study (February 2020) to assist its member agencies with implementation tools necessary to adopt analysis methodology, impact thresholds and mitigation approaches for VMT. Included in this work effort, SBCTA in February 2020 also released to each of its member agencies Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (**SBCTA Guidelines**), which provides a template of specific procedures for complying with the new CEQA requirements for VMT

analysis. (3) Based on the SBCTA Guidelines, the City of Fontana recently adopted its new Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (**City Guidelines**), which documents the City's VMT analysis methodology and approved impact thresholds. (4) The VMT analysis presented in this report has been developed based on the newly adopted City Guidelines.

PROJECT SCREENING

The City Guidelines provides details on appropriate screening criteria that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed analysis. Screening criteria are broken into the following three steps:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Low Project Type Screening

A land use project need only to meet one of the above screening thresholds to result in a less than significant impact.

TPA SCREENING

Consistent with guidance identified in the City Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing "major transit stop"[1] or an existing stop along a "high-quality transit corridor"[2]) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Based on the Screening Tool results presented in Attachment B, the Project site is not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor.

The TPA screening criteria is not met.

[1] Pub. Resources Code, § 21064.3 ("'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").
[2] Pub. Resources Code, § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.").

LOW VMT AREA SCREENING

As noted in the City Guidelines, "Residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area." [3] The Screening Tool uses the sub-regional San Bernardino County Transportation Analysis Model (SBTAM) to measure VMT performance within San Bernardino County for individual traffic analysis zones (TAZ's) within each city. The Project's physical location based on APN is input into the Screening Tool to determine the VMT generated within the respective TAZ as compared to the jurisdictional average inclusive of a particular threshold (e.g., 15% below baseline County of San Bernardino VMT per service population). The results are displayed in Attachment "B", which indicates that the Project is located within a low VMT area. Once a project is confirmed to be within a low VMT area, the City Guidelines also suggests that the traffic analyst ensure that the proposed Project is consistent with the land use assumptions contained in the travel demand model's TAZ used to measure VMT performance.

Based on a review of the socio-economic data contained within the Project's TAZ, the employment found in the TAZ is consistent with the Project's light industrial/warehouse type use, therefore the Project is consistent with the land use assumptions contained in the project-related TAZ.

The Low VMT Area screening criteria is met.

LOW PROJECT TYPE SCREENING

The City Guidelines identify that local serving retail with buildings less than 50,000 square feet or other local serving essential services (e.g., day care centers, public schools, medical/dental office buildings, etc.) are presumed to have a less than significant impact absent substantial evidence to the contrary.

In addition to local serving retail and essential services, small projects anticipated to generate low traffic volumes and by association low greenhouse gas (GHG) emissions are also assumed to cause a less than significant impact. The City's small project threshold is currently under development and is anticipated to be completed within 4-5 weeks from the date of this analysis. Based on initial discussions with City staff, it is our understanding that the daily trip threshold for small project screening could be as high as 400 to 500 daily trips, which the proposed Project would not exceed (i.e., as noted previously the Project is estimated to generate 204 daily trips). However, since the threshold is not finalized or adopted, the low project type screening threshold is not utilized.

The Low Project Type screening criteria is not utilized.

Although the Project is presumed to meet the City's low VMT area screening criteria upon the City's finalization of such criteria (and thus would result in a less than significant VMT impact), because the

[3] Page 12 of the City Guidelines

City's screening criteria are still under development, a review of project generated VMT as compared to the City's adopted impact threshold is provided below for informational purposes.

PROJECT GENERATED VMT

As described in the City Guidelines, SBTAM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. SBTAM is a travel forecasting model that represents a sub-area (San Bernardino County) of the Southern California Association of Governments (SCAG) regional traffic model. SBTAM was designed to provide a greater level of detail and sensitivity in the San Bernardino County area as compared to the regional SCAG model.

Project generated VMT has been calculated using the most current version of SBTAM. Adjustments in socio-economic data (SED) (i.e., employment) for the Project has been made to create a separate TAZ within the model to reflect the Project's industrial warehouse land use. A separate TAZ has been utilized to isolate vehicle trips to/from the Project. Table 1 summarizes the employment factors and employment estimates for the Project. The SBTAM base year (2016) model and cumulative year (2040) model were each run inclusive of the Project's SED.

TABLE 1: EMPLOYMENT DENSITY FACTORS

	Project
Building Square Footage	136,140
Employment Density Factor[4]	1 employee/1,195 SF
Employment	114

As discussed with City staff, project generated VMT for single use projects such as the proposed warehouse building should be calculated using the production-attraction (P/A) trip matrix. Evaluation of VMT, based on trip purpose is consistent with OPR's recommendations as noted in the Technical Advisory and offers the most straight forward method for assessing VMT reductions from the application of mitigation measures for single use project.[5] Based on consultation with City staff, it was determined that project generated VMT per service population would be calculated based on the P/A trip matrix.

Project generated total VMT has been calculated following the VMT calculation procedures identified in the City Guidelines. The total VMT value is then normalized by dividing by the Project's service population (i.e., employees). As shown in Table 2, the baseline Project generated VMT per service population is 20.51 and the cumulative Project generated VMT per service population is 17.74.

[4] Employee Density Factor was obtained from the SCAG employment Density Study (see Table II-B, Derivation of Square Feet per Employee Based on Average Employees Per Acre, Page 4).

[5] Page 5 of OPR's Technical Advisory

TABLE 2: PROJECT VMT PER SERVICE POPULATION

	Baseline Project	Cumulative Project
Total VMT	2,338	2,022
Employment	114	114
VMT per Service Population	20.51	17.74

COUNTY OF SAN BERNARDINO VMT PER SERVICE POPULATION

The County of San Bernardino's current baseline VMT per service population is 28.37 based on the PA method of VMT calculation. As noted in the City Guidelines, this information is available through the SBCTA.

PROJECT LEVEL VMT ASSESSMENT

As described in the City Guidelines, a project would result in a significant project generated VMT impact if either of the following conditions are satisfied:

1. The baseline project generated VMT per service population exceeds 15% below the baseline County of San Bernardino VMT per service population, or
2. The cumulative project generated VMT per service population exceeds 15% below the baseline County of San Bernardino VMT per service population.

Table 3 illustrates the comparison between the Project generated VMT per service population to the County of San Bernardino's baseline VMT per service population. As shown, the Project would not exceed the threshold of 15% below the baseline County of San Bernardino VMT per service population for both the baseline and cumulative Project generated VMT comparisons. As such, the Project's impact is less than significant.

TABLE 3: VMT PER SERVICE POPULATION COMPARISON

	2016 VMT / Service Population	2040 VMT / Service Population
County of San Bernardino VMT per Service Population	28.37	28.37
Project VMT per Service Population	20.51	17.74
Percent Change	-27.7%	-37.5%
Potentially Significant?	No	No

PROJECT'S CUMULATIVE EFFECT ON VMT

The Technical Advisory states that "a project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact."[6] In other words, since the Project generated VMT is less than significant and is consistent with the Light Industrial land use designation in the City of Fontana Land Use Element, the Project's cumulative effect on VMT is also presumed to be less than significant. As stated in the City Guidelines, "if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence."[7] As such, the Project's cumulative effect on VMT is also less than significant.

If you have any questions, please contact me directly at aevatt@ubanxroads.com.

Respectfully submitted,

URBAN CROSSROADS, INC.

Aric Evatt, PTP
President

Robert Vu, PE
Transportation Engineer

[6] Page 6 of the Technical Advisory.
[7] Page 16 of the City Guidelines.

REFERENCES

1. **Institute of Transportation Engineers.** *Trip Generation Manual.* 10th Edition. 2017.
2. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
3. **San Bernardino County Transportation Authority (SBCTA).** *Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment.* February 2020.
4. **City of Fontana Traffic Engineering Division.** *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment.* City of Fontana : s.n., June 2020.

ATTACHMENT A

PROJECT TRIP GENERATION SUMMARY (ACTUAL VEHICLES)

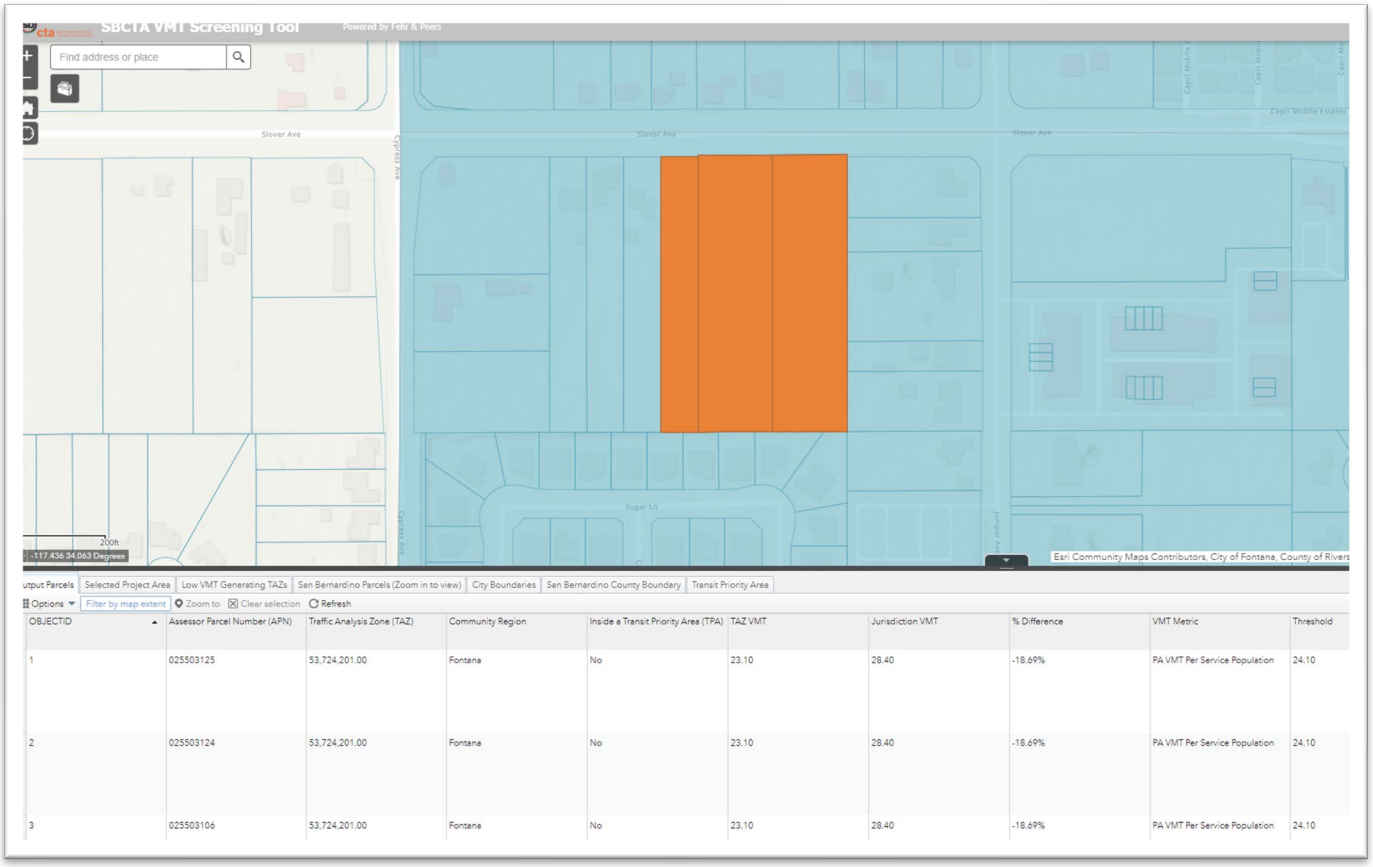
Land Use	Quantity	Units[1]	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Warehousing	115.719	TSF							
Passenger Cars:			13	4	17	5	14	19	148
Truck Trips:									
2-axle			0	0	*0*	0	0	*0*	10
3-axle			0	0	*0*	0	0	*0*	12
4+-axle			1	0	*1*	1	2	*3*	34
- Truck Trips (Actual Vehicles)			*1*	*0*	*1*	*1*	*2*	*3*	*56*
Total Trips (Actual Vehicles)[2]			***14***	***4***	***18***	***6***	***16***	***22***	***204***
High-Cube Cold Storage Warehouse	20.421	TSF							
Passenger Cars:			1	0	2	1	1	2	28
Truck Trips:									
2-axle			0	0	0	0	0	0	6
3-axle			0	0	0	0	0	0	2
4+-axle			0	0	0	0	0	0	8
- Truck Trips (Actual Vehicles)			*0*	*0*	*0*	*0*	*0*	*0*	*16*
Total Trips (Actual Vehicles)[2]			***1***	***0***	***1***	***1***	***1***	***2***	***44***
Passenger Cars			14	4	18	6	15	21	176
Trucks (Actual Vehicles)			1	0	1	1	2	3	72
Project Total Trips (Actual Vehicles)			**15**	**4**	**19**	**7**	**17**	**24**	**248**

[1] TSF = thousand square feet

[2] TOTAL TRIPS = Passenger Cars + Truck Trips.

ATTACHMENT B

SBCTA VMT SCREENING TOOL



OBJECTID	Assessor Parcel Number (APN)	Traffic Analysis Zone (TAZ)	Community Region	Inside a Transit Priority Area (TPA)	TAZ VMT	Jurisdiction VMT	% Difference	VMT Metric	Threshold
1	025503125	53,724,201.00	Fontana	No	23.10	28.40	-18.69%	PA VMT Per Service Population	24.10
2	025503124	53,724,201.00	Fontana	No	23.10	28.40	-18.69%	PA VMT Per Service Population	24.10
3	025503106	53,724,201.00	Fontana	No	23.10	28.40	-18.69%	PA VMT Per Service Population	24.10