

December 18, 2020

Mr. Clark Neuhoff  
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**SUBJECT: 10131 REDWOOD AVENUE VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION**

Dear Mr. Clark Neuhoff:

The following VMT Screening Evaluation has been prepared for the proposed 10131 Redwood Avenue development (**Project**), which is located in the City of Fontana.

### **PROJECT DESCRIPTION**

The Project is proposed to consist of a single building of approximately 247,786 square feet (75% Fulfillment Center and 25% High-Cube Warehouse use).

### **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. (3) The VMT screening evaluation 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 four types:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Low Project Type Screening
- Step 4: Project net daily trips less than 500 ADT

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”<sup>1</sup> or an existing stop along a “high-quality transit corridor”<sup>2</sup>) 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 A, 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.**

### 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

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<sup>1</sup> 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.”).

<sup>2</sup> 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.”).

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.”<sup>3</sup> 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 A, which indicates that the Project is not located within a low VMT area.

**The Low VMT Area screening criteria is not 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. The proposed Project is not considered a local serving use based on the examples provided in the City Guidelines.<sup>4</sup>

**The Low Project Type screening criteria is not utilized.**

### **PROJECT NET DAILY TRIPS LESS THAN 500 ADT SCREENING**

Projects that generate fewer than 500 average daily trips (ADT) (stated in actual vehicles) are deemed to not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT. Substantial evidence in support this daily trip threshold is documented in the City Guidelines.<sup>5</sup> Trip generation rates and a summary of daily vehicle trips for the Project are presented in Attachment B of this memorandum. The trip generation rates used for this analysis are based on the trip generation statistics published in the Institute of Transportation Engineer (ITE) Trip Generation Manual (10<sup>th</sup> Edition, 2017), ITE’s Trip Generation Manual Supplement (February 2020), and the High Cube Warehouse Trip Generation Study (WSP, January 2019).

The Project will generate a net total of 486 daily vehicle trips (actual vehicles), which would not exceed the City’s screening threshold of 500 ADT resulting in a less than significant impact (see Attachment B).

**The Project net daily trips less than 500 ADT screening criteria is met.**

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<sup>3</sup> City Guidelines; Page 12.

<sup>4</sup> City Guidelines; Page 13.

<sup>5</sup> City Guidelines; Appendix B.

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If you have any questions, please contact me directly at [aevatt@urbanxroads.com](mailto:aevatt@urbanxroads.com).

Respectfully submitted,

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Aric Evatt, PTP  
President

Robert Vu, PE  
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## REFERENCES

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

## **ATTACHMENT A**

## SBCTA VMT SCREENING TOOL

The screenshot displays the SBCTA VMT Screening Tool interface. At the top, it is titled "SBCTA VMT Screening Tool" and "Powered by Fehr & Peers". The interface includes a search bar for "Find address or place" and a "User's Guide" link. A "Complete #1 - 4, Then Click 'Run'" dialog box is open, providing instructions for the user. The main map area shows a street grid with a blue-shaded area representing the project area. A "Screening Results" popup window is visible, displaying the following information:

**Screening Results**

Completely No (Fail) within a TPA? No (Fail)

Within a low VMT generating TAZ? No (Fail)

Note: Screening results are based on location of parcel centroids. If results are desired considering the full parcel, please refer to the associated map layers to visually review parcel and TAZ boundary relationship.

Zoom to: ...

The "Map Layers" panel on the right side of the interface is active, showing the following layers:

- Project Area VMT
- Screening Results
- Low VMT Generating TAZs
- Parcels
- Jurisdiction Boundaries
- TAZ
- Transit Priority Area

The bottom of the interface features a scale bar (0 to 100 feet) and a north arrow.

## ATTACHMENT B



## PROJECT TRIP GENERATION

Land Use <sup>1</sup>	ITE LU		AM Peak Hour			PM Peak Hour			Daily
	Units <sup>2</sup>	Code	In	Out	Total	In	Out	Total	
High-Cube Transload and Short-Term Storage Warehouse <sup>3</sup>	TSF	154	0.062	0.018	0.080	0.028	0.072	0.100	1.400
Passenger Cars:			0.049	0.015	0.064	0.024	0.060	0.084	1.176
2-Axle Trucks:			0.002	0.001	0.003	0.001	0.002	0.003	0.037
3-Axle Trucks:			0.003	0.001	0.003	0.001	0.002	0.003	0.046
4+-Axle Trucks:			0.008	0.002	0.010	0.003	0.007	0.010	0.140
High-Cube Fulfillment Center Warehouse <sup>4</sup>	TSF	--	0.094	0.028	0.122	0.046	0.119	0.165	2.129
Passenger Cars:			0.079	0.024	0.103	0.040	0.104	0.144	1.750
2-4 Axle Trucks:			0.006	0.002	0.008	0.003	0.008	0.011	0.162
5+-Axle Trucks:			0.008	0.003	0.011	0.003	0.007	0.010	0.217

<sup>1</sup> Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).

<sup>2</sup> TSF = thousand square feet

<sup>3</sup> Vehicle Mix Source: ITE Trip Generation Handbook Supplement (2020), Appendix C.

Truck Mix: South Coast Air Quality Management District's (SCAQMD) recommended truck mix, by axle type.

Normalized % - Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks.

<sup>4</sup> Vehicle Mix Source: High Cube Warehouse Trip Generation Study, WSP, January 29, 2019.

Inbound and outbound split source: ITE Trip Generation Manual, Tenth Edition (2017) for ITE Land Use Code 154.

Land Use	Quantity Units <sup>1</sup>	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
High-Cube Transload (25%)	61.947 TSF							
Passenger Cars:		3	1	4	1	4	5	74
2-axle Trucks:		0	0	0	0	0	0	2
3-axle Trucks:		0	0	0	0	0	0	4
4+-axle Trucks:		0	0	0	0	0	0	10
Total Trucks:		0	0	0	0	0	0	16
<b>Subtotal for High-Cube Transload (Actual Vehicles)<sup>2</sup></b>		<b>3</b>	<b>1</b>	<b>4</b>	<b>1</b>	<b>4</b>	<b>5</b>	<b>90</b>
High-Cube Fulfillment (75%)	185.840 TSF							
Passenger Cars:		15	4	19	7	19	26	326
2-4 axle Trucks:		1	0	1	1	1	2	30
5+-axle Trucks:		2	0	2	1	1	2	40
Total Trucks:		3	0	3	2	2	4	70
<b>Subtotal for High-Cube Fulfillment (Actual Vehicles)<sup>2</sup></b>		<b>18</b>	<b>4</b>	<b>22</b>	<b>9</b>	<b>21</b>	<b>30</b>	<b>396</b>
Passenger Cars:		18	5	23	8	23	31	400
Total Trucks:		3	0	3	2	2	4	86
<b>Total Trips (Actual Vehicles)<sup>2</sup></b>		<b>21</b>	<b>5</b>	<b>26</b>	<b>10</b>	<b>25</b>	<b>35</b>	<b>486</b>

<sup>1</sup> TSF = thousand square feet

<sup>2</sup> Total Trips = Passenger Cars + Truck Trips.