

April 14, 2021

Mr. John Condas
Allen Matkins
1900 Main Street
Irvine, CA 92614

**SUBJECT: UPDATED WEST VALLEY LOGISTICS CENTER VEHICLE MILES TRAVELED (VMT) SCREENING
 ANALYSIS**

Dear Mr. John Condas:

The following Vehicle Miles Traveled (VMT) Screening Analysis has been prepared for the West Valley Logistics Center (**Project**), which is located south of Jurupa Avenue, west of Locust Avenue, and bisected by Armstrong Road, in the City of Fontana. IDI has requested us to prepare this analysis, even though the Project may not need to have a VMT analysis prepared, because the Project EIR was certified before VMT analyses were required to be prepared. *A Local & Regional Monitor v. City of Los Angeles* (1993) 12 Cal.App.4th 1773, 1801. Also, because at the time the EIR was certified, VMT impacts were known or should have been known, adoption of the requirement to analyze VMT does not constitute significant new information, requiring preparation of a subsequent or supplemental EIR. *Concerned Dublin Citizens v. City of Dublin* (2013) 214 Cal.App.4th 1301, 1320.

PROJECT OVERVIEW

The Project is proposed to consist of the development of 3,473,690 square feet (sf) of High-Cube Fulfillment Center (Non-Sort) Warehouse use. Trips generated by the Project's proposed land uses have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) [Trip Generation Manual](#), 10th Edition, 2017. [1] The proposed Project is anticipated to generate a total of 6,292 vehicle trip-ends per day (in actual vehicles) (See Attachment A). The site is currently designated as Public Facilities and Light Industrial in the City's General Plan, which does allow for the proposed industrial use.

BACKGROUND

To aid in the transition of lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS), 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] Using the Technical Advisory as a reference document, the City of Fontana adopted the [Traffic Impact Analysis \(TIA\) Guidelines for Vehicle Miles Traveled \(VMT\) and Level of Service Assessment](#) (**City Guidelines**). [3] These guidelines have been used to conduct this analysis.

It is our understanding that the City of Fontana utilizes the San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool (**Screening Tool**). The Screening Tool allows users to input an assessor's parcel number (APN) to determine if a project's location meets one or more of the screening thresholds for land use projects identified in the Technical Advisory. The focus of this memorandum is to more thoroughly evaluate each of the applicable screening thresholds to determine if the proposed Project would be expected to cause a less-than-significant impact to VMT without requiring a more detailed VMT analysis.

PROJECT SCREENING

The City Guidelines provides details on appropriate "screening thresholds" 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 thresholds are broken into the following three types:

- Transit Priority Area (TPA) Screening
- Low VMT Area Screening
- 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 Technical Advisory, City Guidelines note that 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 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 threshold 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 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 Transportation Analysis Model (SBTAM) to measure VMT performance within individual traffic analysis zones (TAZ’s) within the region. The Project’s physical location is selected in the Screening Tool to determine project generated VMT. The Project is located in TAZs 53753101 and 53733401. The parcels containing the proposed Project was selected and the Screening Tool was run for Origin-Destination (OD) Total VMT per Service Population measure of VMT.

The SBCTA Screening Results are provided in Attachment B. Based on the OD VMT per Service Population Screening Tool results, it would appear that the Project is partially located in a low VMT area. The Project TAZ 53733401 is not located in a low VMT area and the Project TAZ 53753101 is located in a low VMT area. After further review of the socioeconomic data in Project TAZs, the baseline model land uses are not consistent with the proposed Project. As such, the low VMT areas cannot be applied to this VMT analysis.

The Low VMT Area screening threshold is not met.

LOW PROJECT TYPE SCREENING

The City Guidelines identifies that local serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition to local serving retail, other types of local serving uses (e.g., day care centers, non-destination hotels, affordable housing, places of worship, etc.) may also be presumed to have a less than significant impact as their uses are local serving in nature and would tend to shorten vehicle trips.

The proposed Project is anticipated generate more that 110 daily vehicle trips and is not presumed to have a less than significant impact.

The Low Project Type screening threshold is not met.

Mr. John Condas
Allen Matkins
April 14, 2021
Page 4 of 5

CONCLUSION

Based on our review of applicable VMT screening thresholds, the Project does not meet any of the screening thresholds listed in the City Guidelines.

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

Respectfully submitted,
URBAN CROSSROADS, INC.



Aric Evatt, PTP
President



Robert Vu, PE
Transportation Engineer

REFERENCES

- [1] Institute of Transportation Engineers, Trip Generation Manual, 10th Edition ed., 2017.
- [2] Governor's Office of Planning and Research (OPR), "Technical Advisory on Evaluating Transportation Impacts in CEQA," December 2018.
- [3] City of Fontana, "Traffic Impact Analysis (TIA) Guidelines for Vehicles Miles Traveled (VMT) and Level of Service Assessment," June 2020.

**ATTACHMENT A:
PROJECT TRIP GENERATION**

Trip Generation Rates

Land Use ¹	Units ²	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Actual Vehicle Trip Generation Rates									
High-Cube Fulfillment Center (Non-Sort) ^{3,4}	TSF	155	0.122	0.029	0.150	0.062	0.098	0.160	1.810
Passenger Cars (AM-91.0%; PM-93.0%; Daily-N/A%)			0.111	0.026	0.137	0.058	0.091	0.149	1.620
2-Axle Trucks (AM-1.50%; PM-1.17%; Daily-N/A%)			0.002	0.000	0.002	0.001	0.001	0.002	0.032
3-Axle Trucks (AM-1.86%; PM-1.45%; Daily-N/A%)			0.002	0.001	0.003	0.001	0.001	0.002	0.039
4-Axle+ Trucks (AM-5.63%; PM-4.38%; Daily-N/A%)			0.007	0.002	0.008	0.003	0.004	0.007	0.119
Passenger Car Equivalent (PCE) Trip Generation Rates⁵									
High-Cube Fulfillment Center (Non-Sort) ^{3,4}	TSF	155	0.122	0.029	0.150	0.062	0.098	0.160	1.810
Passenger Cars (AM-91.0%; PM-93.0%; Daily-N/A%)			0.111	0.026	0.137	0.058	0.091	0.149	1.620
2-Axle Trucks (AM-1.50%; PM-1.17%; Daily-N/A%) (PCE = 2.0)			0.004	0.001	0.005	0.001	0.002	0.004	0.063
3-Axle Trucks (AM-1.86%; PM-1.45%; Daily-N/A%) (PCE = 2.5)			0.006	0.001	0.007	0.002	0.004	0.006	0.098
4-Axle+ Trucks (AM-5.63%; PM-4.38%; Daily-N/A%) (PCE = 3.0)			0.021	0.005	0.025	0.008	0.013	0.021	0.357

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

² TSF = thousand square feet

³ 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.

⁴ Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition Supplement (February 2020).

⁵ PCE factors per SBCTA CMP: 2-axle = 1.5; 3-axle = 2.0; 4+-axle = 3.0.

Project Trip Generation Summary

Land Use	Quantity	Units ¹	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Project Trip Generation Summary (Actual Vehicles)									
High-Cube Fulfillment Center (Non-Sort)	3,473.690	TSF							
Passenger Cars:			384	90	474	202	315	517	5,628
Truck Trips:									
2-axle:			6	1	8	3	4	6	112
3-axle:			8	2	10	3	5	8	138
4+-axle:			24	6	29	9	15	24	414
- Truck Trips (PCE)			38	9	47	15	24	39	664
TOTAL TRIPS (Actual)²			422	99	521	217	339	556	6,292

Land Use	Quantity	Units ¹	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Project Trip Generation Summary (PCE)									
High-Cube Fulfillment Center (Non-Sort)	3,473.690	TSF							
Passenger Cars:			384	90	474	202	315	517	5,628
Truck Trips:									
2-axle:			13	3	16	5	8	13	222
3-axle:			20	5	24	8	12	20	342
4+-axle:			71	17	88	28	45	73	1,240
- Truck Trips			104	24	128	41	65	106	1,804
TOTAL TRIPS (PCE)²			488	114	602	243	380	623	7,432

¹ TSF = thousand square feet

² TOTAL TRIPS = Passenger Cars + Truck Trips

**ATTACHMENT B:
SCREENING TOOL**

