

December 15, 2021

Mr. David Ornelas
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SUBJECT: BIRTCHEr LOGISTICS CENTER VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION

Dear Mr. David Ornelas:

The following VMT Analysis has been prepared for the proposed Birtcher Logistics Center development (**Project**), which is located on the southwest corner of Santa Ana Ave and Banana Ave in the City of Fontana.

PROJECT DESCRIPTION

It is our understanding that the Project site is located in the existing Southwest Industrial Park (SWIP) Specific Plan and consists of 341,838 square feet of warehousing use (of which 20% will be evaluated assuming high-cube cold storage use and 80% of warehousing use). (See Attachment A)

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 new 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**) (1). Based on OPR's Technical Advisory, specific procedures for complying with the new CEQA requirements for VMT analysis, the City of Fontana adopted Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (City Guidelines) (2), which documents the City's VMT analysis methodology and approved impact thresholds. The VMT screening evaluation presented in this report has been developed based on the adopted City Guidelines.

PROJECT SCREENING

The City Guidelines describe specific 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 project level VMT analysis. Screening thresholds are described in the following four steps:

- 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

Consistent with City Guidelines, a land use project needs only to satisfy one of the above screening thresholds to result in a less than significant impact.

For the purposes of this analysis, the initial VMT screening process has been conducted with the SBCTA VMT Screening Tool (**Screening Tool**), which uses screening criteria consistent with the screening thresholds recommended in the Technical Advisory and City Guidelines.

STEP 1: 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 A, the Project site is not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor.

TPA screening criteria is not met.

STEP 2: 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

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.”).

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 (i.e., 15% below baseline County of San Bernardino VMT per service population). Based on the Screening Tool results, the Project is not located within a low VMT generating zone as compared to the City’s adopted threshold of 15% below baseline County of San Bernardino VMT per service population. (See Attachment A).

Low VMT Area screening criteria is not met.

STEP 3: 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.⁴

Low Project Type screening criteria is not met.

STEP 4: PROJECT NET DAILY TRIPS LESS THAN 500 ADT SCREENING

Projects that generate fewer than 500 net 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 of this daily trip threshold is documented in the City Guidelines.⁵ The City Guidelines state, “The screening criteria trip limit is based on net trip generation after considering pass-by, internal capture, affordable housing, and/or existing land use trips.” 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 (11th Edition, 2021). (3)

The Project site is located within the Jurupa North Research and Development District (West) (JND) of the SWIP. The JND has proposed to provide opportunities for small business development which would allow a mixture of various types of development including, but not limited to, light industrial, warehousing, logistics-based warehousing, office, flex tech, research and development, and service commercial. This area is also envisioned to provide community serving commercial uses in addition to

³ City Guidelines; Page 12.

⁴ City Guidelines; Page 13.

⁵ City Guidelines; Appendix B.

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the industrial uses, such as grocery stores, restaurants, gas stations, etc. The JND is generally bounded by Mulberry Avenue to the west, Santa Ana to the north, Jurupa Avenue to the south, and Citrus Avenue to the east. The SWIP included the development of approximately 1,344,901 square feet of light industrial use, 478,407 square feet of office use, 847,485 square feet of service commercial use (office park), 338,994 square feet of live-work use, and 338,994 square feet of flex tech research and development use within the JND West area. As shown in Attachment C, the SWIP Project Traffic Analysis (prepared by RBF Consulting, September 29, 2011) concluded that the JND (West) area would generate 2,990 trips per day, with 427 trips generated during the AM peak hour and 404 trips generated during the PM peak hour. A trip generation rate for uses within the JND (West) has been developed by dividing the trip generation by the proposed 3,348,781 square feet of future development. As such, based on the trip generation rates for the currently approved uses within the JND (West), the Project is anticipated to generate 916 trips per day, with 67 trips generated during the AM peak hour and 74 trips generated during the PM peak hour. Thus, the Projects results in a net decrease of 2,074 daily vehicle trips. Therefore, would not exceed the City's screening threshold of 500 ADT.

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

CONCLUSION

Based on our findings, the Project was found to reduce the daily vehicle trips by 2,374 as compared to the approved SWIP specific plan in the JND (West) area. Therefore, the Project would meet the project net daily trips less than 500 ADT screening criteria. Meeting the daily trip screening criteria would result in a less than significant impact for VMT; no further VMT analysis required.

If you have any questions, please contact me directly at 949-660-1994.

Respectfully submitted,

URBAN CROSSROADS, INC.

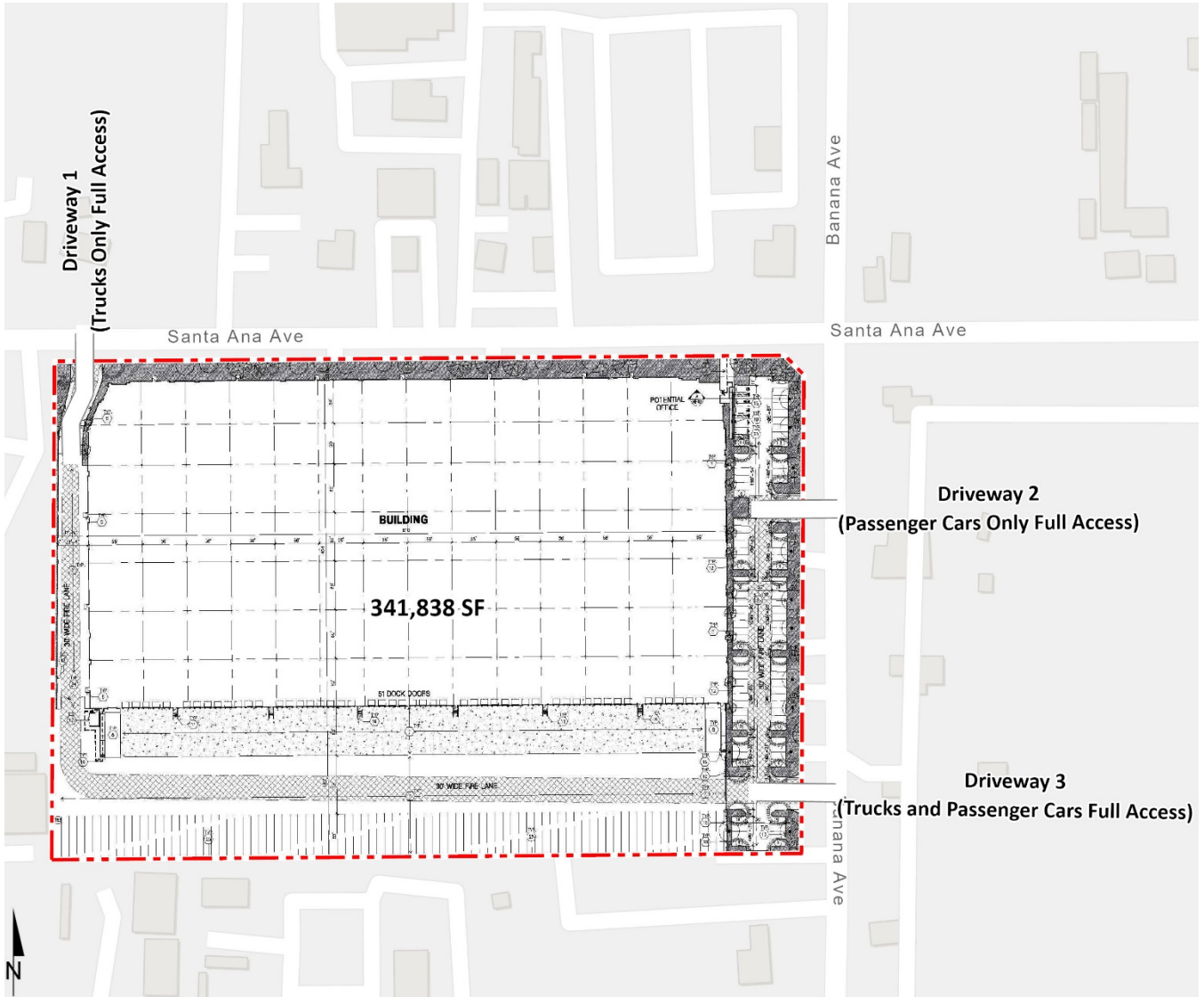


Alexander So
Senior Analyst

REFERENCES

1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
2. **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.
3. **Institute of Transportation Engineers.** *Trip Generation Manual.* 11th Edition. 2021.

ATTACHMENT A
PRELIMINARY SITE PLAN



ATTACHMENT B
SBCTA SCREENING TOOL

SBCTA VMT Screening Tool Powered by Fehr & Peers User's Guide

Banana Ave & Santa Ana Ave, Fr X

Show search results for Banana Ave ...

Complete #1 - 4, Then Click 'Run'

VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*

OD VMT Per Service Population

#3. Select the Baseline Year. The years available for analysis are from 2016 to 2040.*

2022

#4. Select the Threshold (% reduction from baseline year). Note each jurisdiction may have adopted a different metric by which they measure VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*

Below County Baseline (-15%)

[Help](#) **Run**

Map Layers

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

Project Area VMT (1 of 2)

Assessor Parcel Number (APN)	023616177
Traffic Analysis Zone (TAZ)	53711202
TAZ VMT	125.9
Jurisdiction VMT	33.3
% Difference	277.85%
VMT Metric	OD VMT Per Service Population
Threshold	28.3

[Zoom to](#) ...

City of Fontana, County of Riverside, San Bernar

ATTACHMENT C
PROJECT TRIP GENERATION

TABLE 1: 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:									
Warehousing ³	TSF	150	0.131	0.039	0.170	0.050	0.130	0.180	1.710
Passenger Cars			0.114	0.034	0.148	0.043	0.110	0.153	1.248
2-Axle Trucks			0.003	0.001	0.004	0.001	0.003	0.005	0.077
3-Axle Trucks			0.004	0.001	0.005	0.002	0.004	0.006	0.096
4+-Axle Trucks			0.011	0.003	0.014	0.005	0.012	0.017	0.289
High-Cube Cold Storage Warehouse ³	TSF	157	0.085	0.025	0.110	0.032	0.088	0.120	2.120
Passenger Cars			0.062	0.018	0.080	0.025	0.067	0.092	1.378
2-Axle Trucks			0.008	0.002	0.010	0.003	0.007	0.010	0.257
3-Axle Trucks			0.003	0.001	0.003	0.001	0.002	0.003	0.082
4+-Axle Trucks			0.012	0.004	0.016	0.004	0.011	0.015	0.403
Passenger Car Equivalent (PCE) Trip Generation Rates:⁴									
Warehousing ³	TSF	150	0.131	0.039	0.170	0.050	0.130	0.180	1.710
Passenger Cars			0.114	0.034	0.148	0.043	0.110	0.153	1.248
2-Axle Trucks (PCE = 2.0)			0.006	0.002	0.007	0.003	0.006	0.009	0.154
3-Axle Trucks (PCE = 2.5)			0.009	0.003	0.011	0.004	0.010	0.014	0.239
4+-Axle Trucks (PCE = 3.0)			0.032	0.010	0.042	0.014	0.037	0.051	0.867
High-Cube Cold Storage Warehouse ³	TSF	157	0.085	0.025	0.110	0.032	0.088	0.120	2.120
Passenger Cars			0.062	0.018	0.080	0.025	0.067	0.092	1.378
2-Axle Trucks (PCE = 2.0)			0.016	0.005	0.021	0.005	0.014	0.019	0.515
3-Axle Trucks (PCE = 2.5)			0.006	0.002	0.008	0.002	0.006	0.008	0.204
4+-Axle Trucks (PCE = 3.0)			0.037	0.011	0.048	0.012	0.033	0.045	1.209

¹ Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

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.

Normalized % - With Cold Storage: 34.7% 2-Axle trucks, 11.0% 3-Axle trucks, 54.3% 4-Axle trucks.

⁴ PCE factors per City's Guidelines: 2-axle = 2.0; 3-axle = 2.5; 4+-axle = 3.0.

TABLE 2: SWIP TRIP GENERATION SUMMARY

Land Use	Quantity Units ¹	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Jurupa North Research and Development District (West)								
JND (West) Total Trip Generation ²	3,348.781 TSF	3,699	515	4,214	537	3,409	3,946	29,278
JND (West) Trip Generation Rate	TSF	1.10	0.15	1.25	0.16	1.02	1.18	8.74
Proposed Project Trip Generation:								
JND (West)	341.838 TSF	376	51	427	55	349	404	2,990

¹ TSF = thousand square feet

² Source: SWIP Project Traffic Analysis, RBF Consulting, September 29, 2011.

TABLE 3: PROJECT TRIP GENERATION SUMMARY

Land Use	Quantity Units ¹	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Actual Vehicles:								
Warehousing (80%)	273.470 TSF							
Passenger Cars:		31	9	40	12	30	42	342
2-axle Trucks:		1	0	1	0	1	1	22
3-axle Trucks:		1	0	1	0	1	1	26
4+-axle Trucks:		3	1	4	1	3	4	80
Total Trucks:		5	1	6	1	5	6	128
Total Trips (Actual Vehicles)²		36	10	46	13	35	48	470
High-Cube Cold Storage Warehouse (20%)	68.368 TSF							
Passenger Cars:		4	1	5	2	5	7	94
2-axle Trucks:		1	0	1	0	0	0	18
3-axle Trucks:		0	0	0	0	0	0	6
4+-axle Trucks:		1	0	1	0	1	1	28
Total Trucks:		2	0	2	0	1	1	52
Total Trips (Actual Vehicles)²		6	1	7	2	6	8	146
Total Passenger Cars		35	10	45	14	35	49	436
Total Trucks		7	1	8	1	6	7	180
Project Total Trips (Actual Vehicles)²		42	11	53	15	41	56	616
Passenger Car Equivalent (PCE):								
Warehousing (80%)	273.470 TSF							
Passenger Cars:		31	9	40	12	30	42	342
2-axle Trucks:		2	0	2	1	2	3	42
3-axle Trucks:		2	1	3	1	3	4	66
4+-axle Trucks:		9	3	12	4	10	14	238
Total Trucks (PCE):		13	4	17	6	15	21	346
Total Trips (PCE)²		44	13	57	18	45	63	688
High-Cube Cold Storage Warehouse (25%)	68.368 TSF							
Passenger Cars:		4	1	5	2	5	7	94
2-axle Trucks:		1	0	1	0	1	1	36
3-axle Trucks:		0	0	0	0	0	0	14
4+-axle Trucks:		3	1	4	1	2	3	84
Total Trucks (PCE):		4	1	5	1	3	4	134
Total Trips (PCE)²		8	2	10	3	8	11	228
Total Passenger Cars		35	10	45	14	35	49	436
Total Trucks		17	5	22	7	18	25	480
Project Total Trips (PCE)²		52	15	67	21	53	74	916

¹ TSF = thousand square feet

² PCE rates are per SANBAG.

² Total Trips = Passenger Cars + Truck Trips.

TABLE 4: TRIP GENERATION COMPARISON

Land Use	Quantity Units ¹	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Passenger Car Equivalent (PCE):								
Proposed Project	341.838 TSF							
Approved Project (JND West)		376	51	427	55	349	404	2,990
Proposed Project (in PCE)		52	15	67	21	53	74	916
Variance		-324	-36	-360	-34	-296	-330	-2,074

¹ TSF = thousand square feet