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July 29, 2020

Donald Young
Engineer Manager
City of Redlands
35 Cajon Street, Suite 15A
Redlands, California 92373

Subject: 301 West Palm Avenue Project Trip Generation and Vehicle Miles Traveled Analysis
Memorandum (LSA Project No. CRX2001)

Dear Donald,

LSA has prepared this project trip generation and vehicle miles traveled (VMT) analysis memorandum for the 301 West Palm Avenue Project (project) in the City of Redlands (City). The project site is located at 301 West Palm Avenue. Currently, the site consists of existing structures and orange trees. The proposed project consists of a 30-unit, gated single-family homes while retaining the existing structures on site. Figure 1 (all figures and tables attached) illustrates the regional and project location. Figure 2 illustrates the conceptual site plan for the project.

The purpose of this memorandum is to determine whether a Traffic Impact Study (TIS) will be required for the proposed project and any potential project effect on vehicle miles traveled.

PROJECT TRIP GENERATION

Since the City does not have its own TIS guidelines, this memorandum has been prepared consistent with the San Bernardino County (County) *Transportation Impact Study* Guidelines, dated July 2019. The County's TIS guidelines states uses that generate 100 or more peak hour trips will need to prepare a TIS. Additionally, if a project adds 50 or more peak hour trips to any major intersection a TIS may be required.

The trip generation for the proposed project was determined using rates from the Institute of facility was determined using rates from the Institute of Transportation Engineers *Trip Generation Manual* (10th Edition) for Land Use 210 – "Single-Family Detached Housing." As illustrated in Table A, the project will generate 23 trips during the a.m. peak hour, 30 trips during the p.m. peak hour, and 283 daily trips. Since, the project will generate less than 100 peak hour trips, and will not be adding 50 or more peak hour trips to any major intersection, a TIS will not be required for the project.

PROJECT VEHICLE MILES TRAVELED ANALYSIS

Background

On December 28, 2018, the California Office of Administrative Law cleared the revised CEQA guidelines for use. Among the changes to the guidelines were removal of vehicle delay and level of service from consideration under CEQA. With the adopted guidelines, transportation impacts are to

be evaluated based on a project's effect on VMT. Lead agencies are allowed to opt-in to the revised transportation guidelines, but the new guidelines must be used starting July 1, 2020.

Therefore, the *City of Redlands CEQA Assessment VMT Analysis Guidelines*, adopted July 2020 (VMT guidelines) was used to determine the project VMT impacts. Additionally, the state law also provides guidance to evaluate the project's impacts related to VMT. California Public Resources Code Section 15064.3(b)(4) states (in part) that:

A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household, or in any other measure.

Therefore, the project VMT impacts were analyzed based on the City's VMT guidelines.

Methodology

The VMT guidelines provide several screening criteria for projects within the City. Projects that could not be screened out by the screening criteria should conduct further VMT analysis to identify project related VMT impacts.

One of the screening criteria included in the VMT guidelines is project screening by project type and projects that are forecast to generate less than 3,000 MT CO₂e (carbon dioxide equivalent) per year. The VMT guidelines states the following:

"Projects which generate less than 3,000 MT CO₂e per year can be presumed to have a less than significant impact on VMT. Projects which generate less than 3,000 MT CO₂e per year include the following:

Single family residential – 167 Dwelling Units or fewer."

As previously stated, the project includes only 30 single-family residential units, which is significantly lower than the threshold of 167 units as stated in the VMT guidelines. Therefore, based on the VMT guidelines, the project would not have any significant VMT impacts.

Should you have any questions, please do not hesitate to contact me at (951) 781-9310 or email me at Ambarish.Mukherjee@lsa.net.

Sincerely,

LSA



Ambarish Mukherjee, AICP, PE
Principal

Attachments:

Figure 1: Regional and Project Location

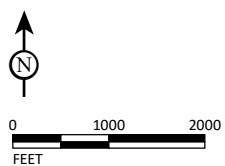
Figure 2: Conceptual Site Plan

Table A: Project Trip Generation



FIGURE 1

LSA



SOURCE: Bing Aerial, 2018; ESRI Streetmap, 2013.

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301 West Palm Avenue
Trip Generation and Vehicle Miles Traveled Analysis Memorandum
Regional and Project Location



Table A - Project Trip Generation

Land Use	Units	A.M. Peak Hour			P.M. Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Single-Family Detached Housing	30 DU							
Trips/Unit ¹		0.19	0.55	0.74	0.62	0.37	0.99	9.44
Trip Generation		6	17	23	19	11	30	283

Notes:

DU = Dwelling Units

¹ Rates derived from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (10th Edition) for Land Use 210 - "Single-Family Detached Housing", Setting/Location - "General Urban/Suburban."