

ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

To: City of Redlands Engineering Department
From: Alex J. Garber
Date: 6/9/2022
Re: VMT Screening Analysis for the Grand Residential Project (CRA 911)

This technical memorandum evaluates the trip generation and need to prepare a vehicle miles traveled (VMT) analysis for the proposed Grand Residential Project. The project is located on the northeast corner of Eureka Street and Redlands Boulevard in the City of Redlands. This memo will evaluate the project using the City of Redlands CEQA Assessment VMT Analysis Guidelines (VMT Guidelines).

Project Description

The project site is currently occupied by a commercial building. This analysis does not take credit for any existing trips since the commercial building is mostly vacant. Access to the project would be provided by two driveways, one on Eureka Street and one on 3rd Street.

The proposed residences would consist of 146 multifamily dwelling units, 12,214 square foot roof deck and 10,733 square foot pool plaza. The project site plan is shown in Figure 1.¹

There would be a total of 182 covered parking spaces provided for residents and guests. The City has updated the parking code requirements for Multi-Family Housing within a Transit Priority Area (TPA) (Ordinance No. 2930), which requires one space for one bedroom apartments. As all of the units are proposed to be one-bedroom units, the project would be required to provide 146 spaces the project provides 182 spaces, above the minimum requirement.

Project Trip Generation

The project trip generation was prepared using trip rates for Multifamily Housing (Mid-Rise, Close to Transit) (Land Use Code 221) from the Institute of Transportation Engineers (ITE)². Table 1 presents the trip generation estimate for the proposed project. As shown in Table 1, the project is forecast to generate 708 daily trips, including 48 trips during the AM peak hour and 43 trips during the PM peak hour. As stated previously, the project trip generation does not take credit for the existing commercial use.

City of Redlands VMT Screening

The City of Redlands VMT guidelines provides VMT screening thresholds to identify projects that would be considered to have a less than significant impact on VMT and therefore could be screened out from further analysis. If a project meets one of the following criteria, then the VMT impact of the project would be considered less than significant and no further analysis of VMT would be required:

1. The project is in a Transit Priority Area (TPA).
2. The project is in a low VMT generating area.
3. a) The project is one of the following land uses:
 - o Local serving retail projects with stores less than 50,000 square feet

¹ Subsequent site plan shows a lower unit count; therefore, this trip generation provides a conservative analysis.

² *Trip Generation*, 11th Edition, Institute of Transportation Engineers (ITE). 2021.

- Local-serving K-12 school
 - Local parks
 - Day care center
 - Local-serving banks
 - Local-serving hotel (e.g., non-destination hotel)
 - Student housing project on or adjacent to a college campus
 - Local-serving assembly use (place of worship, community organization)
 - Community institutions (Public libraries, fire stations)
 - Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
 - Affordable or supportive housing
 - Assisted living facilities
 - Senior housing (as defined by the Federal Department of Housing and Urban Development)
 - Project generating less than 3,000 Metric Tons of CO₂e (MTCO₂e) per year
- b) The project generates less than 3,000 MT CO₂e per year. This includes:
- Single family residential – 167 dwelling units (DU) or fewer
 - Multifamily residential (low-rise) – 232 DU or fewer
 - Multifamily residential (mid-rise) – 299 DU or fewer
 - Office – 59,100 square feet (SF) or less
 - Local-serving retail – 112,400 SF or less (no stores larger than 50,000 SF)
 - Warehousing – 463,600 SF or less
 - Light industrial – 74,600 SF or less

The applicability of each criterion to the project is discussed below.

Screening Criteria 1 – Transit Priority Area: The City's guidelines include a link to the San Bernardino County Transportation Authority (SBCTA) screening tool. The tool includes a layer showing the High Quality Transit Areas within the County. As can be seen in Figure 2, the project is located within a High Quality Transit Area. The guidelines also state four criteria the project must comply with to meet the Transit Priority Area screening threshold. Below are the four criteria and their applicability to the project:

- Has a Floor Area Ratio (FAR) of more than 0.75: The proposed project has a FAR of 1.97, above the 0.75 threshold meeting the FAR criteria.
- Includes less parking for use by residents, customers or employees of the project than required by the jurisdiction: The City's parking code requires 146 parking stalls, less than the 182 parking stalls provided by the project, failing the parking criteria.
- Is consistent with the applicable Sustainable Communities Strategy: If the project is consistent with the current land use, the project is also consistent with the applicable Sustainable Communities Strategy. The project is consistent with the growth assumptions analyzed in the 2020-2045 RTP/SCS, as the project area is a Priority Growth Area located within a half mile from high quality transit, meeting the Sustainable Communities Strategy criteria.
- Does not replace affordable residential units with a smaller number of moderate- or high-income residential units: The existing site is a commercial use; therefore, no housing would be replaced and the project meets the criteria.

As can be seen, the project complies with three of the four criteria for Screening Criteria 1. Therefore, the project does not satisfy Screening Criteria 1 – Transit Priority Area.

Screening Criteria 2 – Low VMT Generating Area: The City's guidelines include a link to the San Bernardino County Transportation Authority (SBCTA) screening tool. Low VMT generating areas are defined as traffic analysis zones (TAZs) with a total daily VMT/Service Population (employment plus population) that is 15% less than the baseline level for the County. The project is located in TAZ 53834702, which has a VMT/Service

Population that is 194.41% above the County Average. Therefore, the project is not in a low VMT generating area and would not meet Screening Criteria 2 – Low VMT Generating Area. Figure 3 shows the VMT inputs and results.

Screening Criteria 3 – Project Type Screening: The project proposes a multifamily residential use, which would apply to the Multifamily residential (mid-rise) use mentioned in the VMT guidelines. The thresholds in the guidelines represent the maximum size of the land use that would generate less than 3,000 Metric Tons of CO₂e (MTCO₂e). The threshold for the multifamily residential (mid-rise) use is 299 dwelling units. The project proposes 146 dwelling units; therefore, the project would meet Screening Criteria 3 – Project Type Screening.

Summary

The project was evaluated using the City of Redlands VMT screening thresholds to determine if the project would require a VMT analysis. The project would meet the City's screening criteria for Project Type Screening. Therefore, the project VMT impacts of the project would be considered less than significant and further analysis of VMT would not be required.

If you have any questions about this information, please contact me at (717) 756-1997 or alex@epdsolutions.com.

Table 1. Project Trip Generation

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
<u>Trip Rates</u>								
Multifamily Housing (Mid-Rise) ¹	DU	4.75	0.18	0.14	0.32	0.12	0.17	0.29
<u>Project Trip Generation</u>								
Multi Family Housing	146 DU	694	26	21	47	18	24	42
DU = Dwelling Unit								
¹ Trip rates from the Institute of Transportation Engineers, <i>Trip Generation, 11th Edition</i> , 2021. Land Use Code 221 - Multifamily Housing (Mid-Rise, Close to Rail Transit).								

Figure 1: Project Site Plan

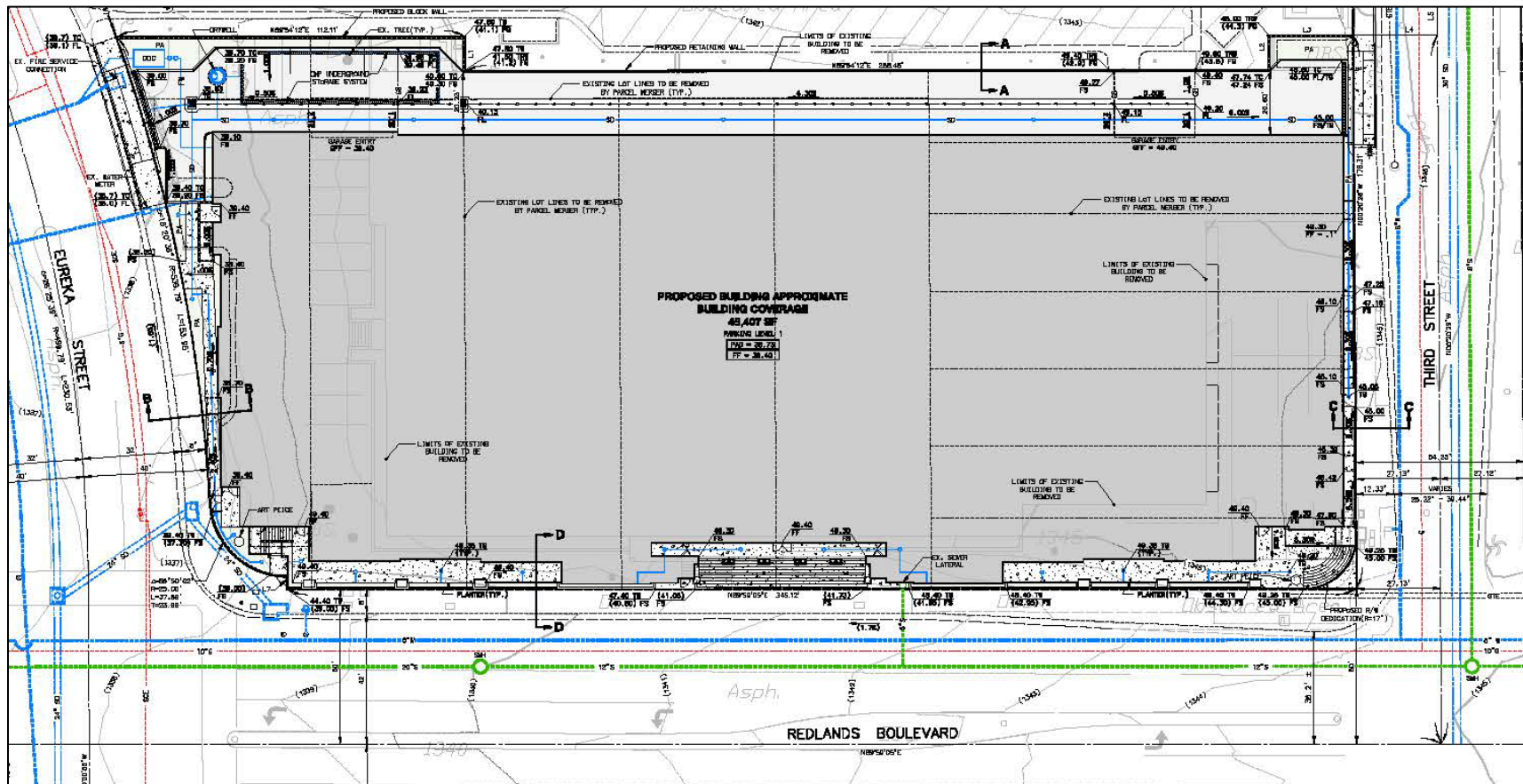


Figure 2: High Quality Transit Area Map

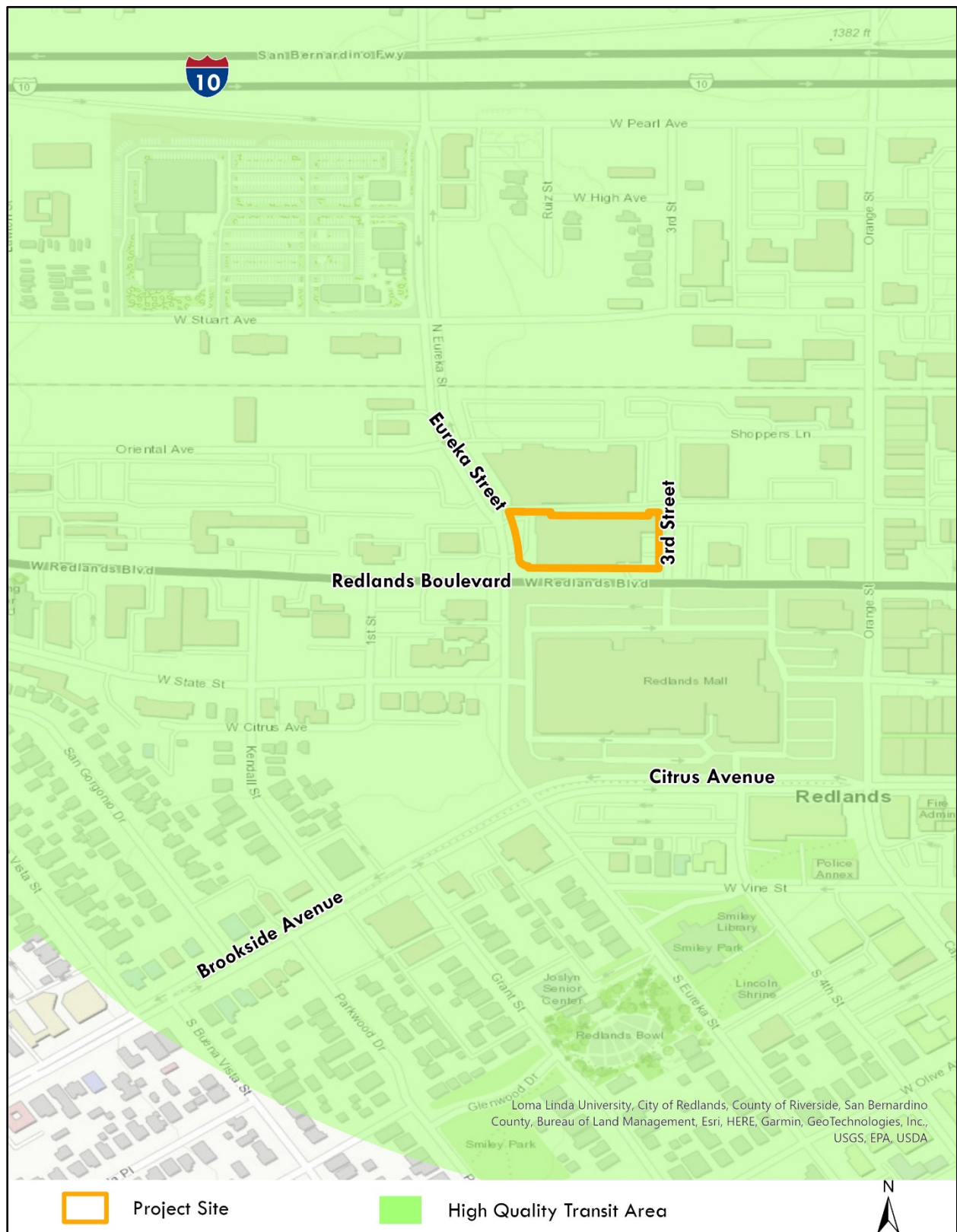


Figure 3: SBCTA VMT Screening Results