LINSCOTT LAW & GREENSPAN
engineers

Engineers & Planners
Traffic
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Linscott, Law & Greenspan, Engineers
2 Executive Circle
Suite 250
Irvine, CA 92614
949.825.6175 T
949.825.6173 F
www.llgengineers.com

Pasadena
Irvine
San Diego
Woodland Hills

August 9, 2022

Mr. Adam Lentz
Madison Capital Group, LLC
6805 Morrison Boulevard, Suite 250
Charlotte, NC 28211

LLG Reference: 2.20.4495.1

Subject: ***Updated*** **Traffic Circulation & VMT Impact Assessment for the Proposed Madison Capital Self Storage Project**
Redlands, California

Dear Mr. Lentz:

Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit the findings of this *Updated* Traffic Circulation Impact Assessment for the proposed Madison Capital Self Storage Project to be located on a vacant parcel located on the south side of Naples Avenue between Wabash Avenue and Jasper Avenue in the east in the City of Redlands, California.

This analysis evaluates the potential traffic circulation and vehicle miles traveled (VMT) impacts associated with the proposed Project, which will include a separate analysis for level of service (LOS) based on Measure U and a separate analysis for CEQA based on VMT. Measure U became effective December 12, 1997 and is an initiative ordinance of the people of Redlands establishing principles of managed development. Specifically, *Section 2; 1A.60 PRINCIPLE SIX* of Measure U applies to this analysis. In addition, Measure U does not explicitly identify the trip threshold for determining the requirement for when a level of service (LOS) analysis is necessary and/or which roadways and intersections should be included in such analyses for development Projects. However, historically the threshold for determining the need to perform LOS analyses for the purposes of Measure U compliance and identifying which intersections and roadways to analyze was based on a 50 peak hour trip threshold, as determined from the County of San Bernardino Congestion Management Program (CMP) traffic impact analysis guidelines traditionally used by the City for preparation of traffic studies within its jurisdiction.

PROJECT LOCATION AND DESCRIPTION

The Project site consists of one (1) vacant ±6.34 acre parcel of land bounded by Naples Avenue on the north, Wabash Avenue on the west and Jasper Avenue on the east. ***Figure 1*****,** attached, presents a Vicinity Map that illustrates the general location of the Project site and surrounding street system, while ***Figure 2*** presents an existing site aerial.

The proposed Project will consist of 835 self storage units within eleven (11) buildings totaling 123,456 square feet (SF) [114,780 SF net rentable area]. Access for the Project site will be provided via a one (1) main access driveway along Wabash Avenue and one (1) secondary access driveway along Jasper Avenue. ***Figure 3*** presents the proposed site plan for the Project, prepared by MCG Architecture.

PROJECT TRAFFIC CHARACTERISTICS AND LOS ASSESSMENT

Trip Generation Forecast

Traffic generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Generation equations and/or rates used in the traffic forecasting procedure are found in the 11th Edition of *Trip Generation*, published by the Institute of Transportation Engineers (ITE) [Washington D.C., 2021].

Table 1, attached, summarizes the trip generation rates used in forecasting the vehicular trips generated by the proposed Project's forecast peak hour and daily traffic volumes. As shown in the upper portion of *Table 1*, the trip generation potential of the proposed Madison Capital Self Storage Project was estimated using ITE Land Use 151: *Mini Warehouse* trip rates based on square-footage of net rentable area, which is the most conservative trip rate. Review of the bottom portion of *Table 1* indicates that the proposed Madison Capital Self Storage Project is forecast to generate 189 daily trips, with 12 trips (6 inbound, 6 outbound) produced in the AM peak hour and 20 trips (10 inbound, 10 outbound) produced in the PM peak hour on a "typical" weekday.

As a result, based on the Daily, AM peak hour, and PM peak hour trip generation potential of the proposed Project (i.e. < 50 peak hour trips) and Measure U thresholds for significance, the proposed Project will not adversely impact the surrounding transportation system and therefore, no LOS analysis is needed.

SITE ACCESS AND ON-SITE CIRCULATION EVALUATION

As shown in *Figure 3*, access for the proposed Project site will be provided via one (1) full movement main driveway located along Wabash Avenue and one (1) egress-only secondary driveway located along Jasper Avenue.

The on-site circulation layout of the proposed Project as illustrated in *Figure 3* on an overall basis is adequate. Recreational vehicles and small moving vans (i.e. U-Haul, etc.) will be able to adequately circulate throughout the site. The driveway width has been confirmed and are generally adequate for large pick-up trucks and small moving vans.

SB 743 VMT ASSESSMENT

On December 28, 2018, the California Natural Resources Agency adopted revised CEQA Guidelines. Among the changes to the guidelines was the removal of vehicle delay and LOS from consideration for transportation impacts under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled. Lead agencies are allowed to continue using their current impact criteria, or to opt into the revised transportation guidelines. However, the new guidelines must be used starting July 1, 2020, as required in CEQA section 15064.3.

In late 2019, State courts stated that under section 21099, subdivision (b)(2), existing law is that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects. As a result of SB 743, the new metric in the CEQA guidelines for transportation impacts is VMT per capita. The legislative intent of SB 743 is to balance the needs of congestion management with statewide goals for infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

The approach and methodology outlined in this report is based on the *City of Redlands CEQA Assessment VMT Analysis Guidelines* and is generally consistent with the *Technical Advisory for Evaluating Transportation Impacts In CEQA,* published by the Governor's Office of Planning and Research (OPR), December 2018 (OPR Technical Advisory), which provides additional detail on the language and approach described in this Technical Memorandum.

Under the VMT methodology, screening is used to determine if a project will be required to conduct a detailed VMT analysis.

The City of Redlands has developed SB 743 VMT Impact Screening Criteria to serve as a screening tool for potential VMT impacts associated with select land use projects in the city. As such, the following guidance summarizes the potential project screening and would not have a significant transportation related CEQA impact, as shown in *Step 3: Project Type Screening*:

Local Serving Projects

Project that induce local service land uses are determined to shorten non-discretionary trips by putting goods and services closer to residents, resulting in an overall reduction in VMT. Theses land uses can be presumed to have a less than significant impact, absent substantial evidence to the contrary. Local serving land uses are listed below:

- Local-serving retail projects less than 50,000 square feet
- Local-serving K-12 schools
- Local parks
- Day care centers
- Local-serving gas stations
- Local-serving banks
- Local-serving hotels (e.g. non-destination hotels)
- Student housing projects on or adjacent to college campuses
- Local-serving assembly uses (places of worship, community organizations)
- Community institutions (Public libraries, fire stations, local government)
- 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 HUD)

Small Projects

This applies to projects with low trip generation per CEQA exemptions or results in a 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO2e) per year screening level threshold, based on the County of San Bernardino's Climate Action plan and South Coast Air Quality Management District's draft interim guidance for assessing project-level greenhouse gas impacts.

- Single family residential - 167 dwelling units or fewer
- Multifamily residential (low-rise) - 232 dwelling units or fewer
- Multifamily residential (mid-rise) - 299 dwelling units or fewer
- Office – 59,000 square feet or less
- Local Serving Retail – 112,400 square feet or less (no store larger than 50,000 square feet)
- ***Warehousing - 463,600 square feet or less***
- Light Industrial - 74,600 square feet or less

Therefore, since the proposed Project consists of mini-warehousing of 123,456 SF, which is less than the *"Small Projects" (< 3,000 MT CO2e)* threshold of 463,600 square feet, this project could be screened from a VMT analysis and would not have a significant transportation related CEQA impact, per the *City of Redlands CEQA Assessment VMT Analysis Guidelines.*

CONCLUSION

Based on the results of the aforementioned Project trip generation forecast for the proposed Madison Capital Self Storage project [123,456 SF self-storage development (114,780 SF net rentable area) within eleven buildings and 835 storage units], which is 189 daily trips, with 12 trips (6 inbound, 6 outbound) produced in the AM peak hour and 20 trips (10 inbound, 10 outbound) produced in the PM peak hour on a "typical" weekday, we conclude that the proposed Project's traffic circulation impact is considered "insignificant" based on a "50 peak hour trip" threshold historically utilized for determining the need to perform LOS analyses for purposes of Measure U compliance and identifying which intersections and roadways to analyze. Therefore, using the "50 trip" threshold, the Project would not require any specific intersection LOS analysis.

In addition, The site access and on-site circulation layout of the proposed Project as illustrated in *Figure 3* on an overall basis is adequate.

Lastly, since the proposed Madison Capital Self Storage Project consists of mini-warehousing of 123,456 SF, which is less than the *"Small Projects" (< 3,000 MT CO2e)* threshold of 463,600 square feet, this project could be screened from a VMT analysis and would not have a significant transportation related CEQA impact, per the *City of Redlands CEQA Assessment VMT Analysis Guidelines.*

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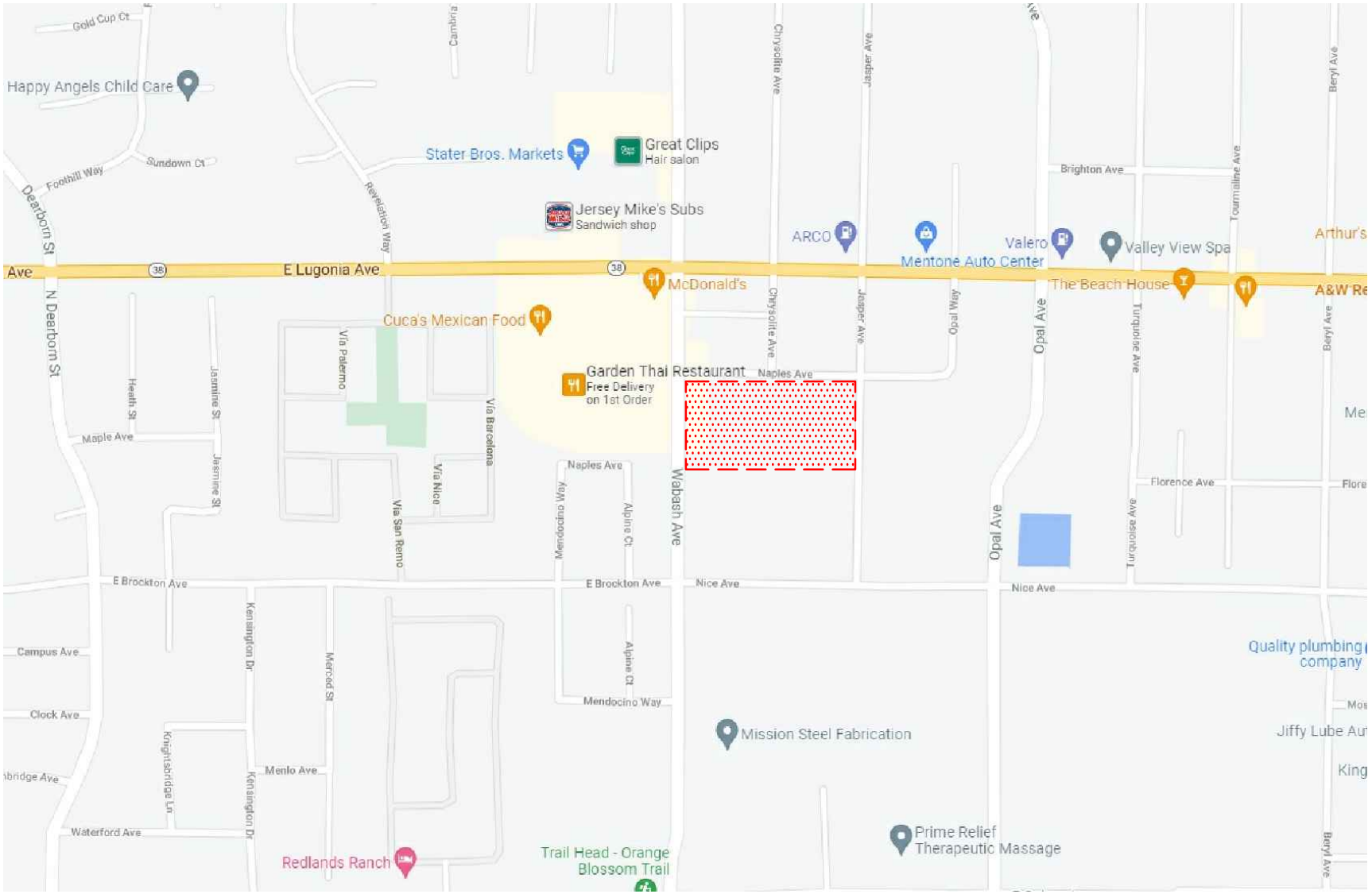
We appreciate the opportunity to provide this Updated Traffic Circulation & VMT Impact Assessment. Should you need further assistance, or have any questions regarding this analysis, please call us at (949) 825-6175.

Very truly yours,
Linscott, Law & Greenspan, Engineers

Keil D. Maberry, P.E.
Principal

Attachments



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SOURCE: GOOGLE

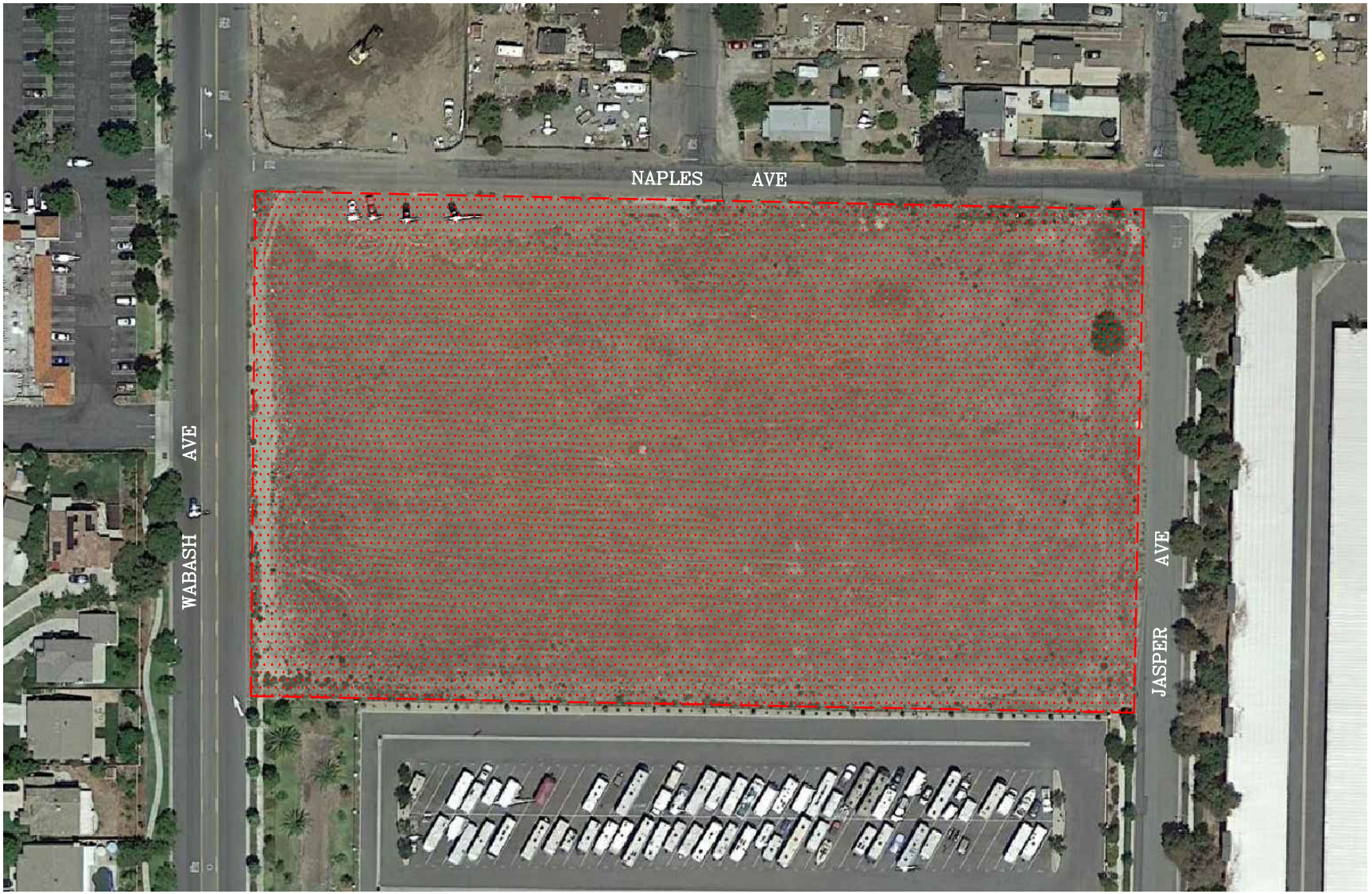
KEY

= PROJECT SITE

FIGURE 1

VICINITY MAP

MADISON CAPITAL SELF STORAGE, REDLANDS



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NO SCALE

SOURCE: GOOGLE

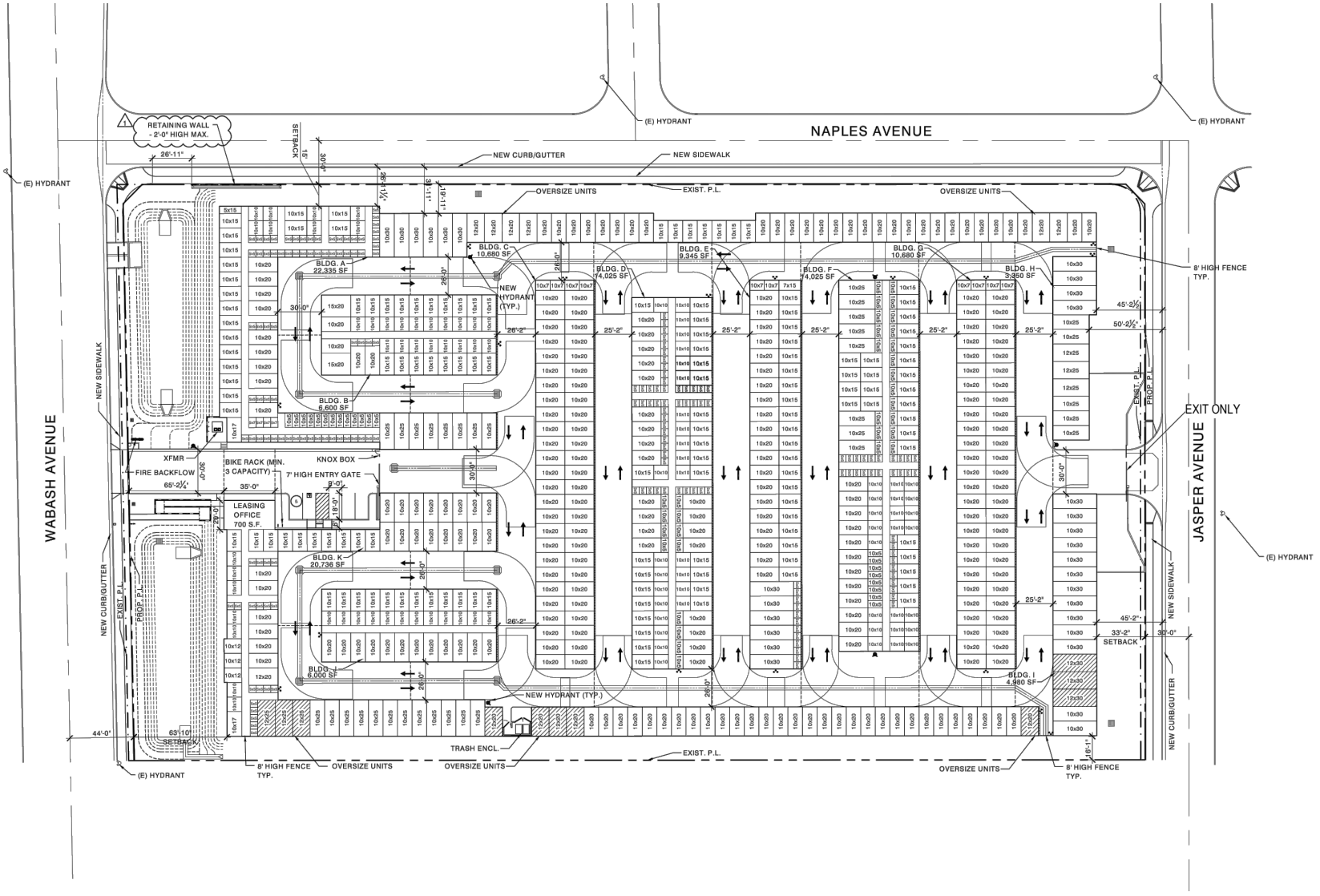
KEY

= PROJECT SITE

FIGURE 2

EXISTING SITE AERIAL

MADISON CAPITAL SELF STORAGE, REDLANDS



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SOURCE: MADISON CAPITAL GROUP

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FIGURE 3

PROPOSED SITE PLAN

MADISON CAPITAL SELF STORAGE, REDLANDS

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TABLE 1
PROJECT TRIP GENERATION FORECAST[1]
MADISON CAPITAL SELF STORAGE, REDLANDS

ITE Land Use Code / Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Trip Generation Factors:							
▪ 151: Mini Warehouse (TE/TSF Net Rentable Area)	1.65	52%	48%	0.10	52%	48%	0.17
Proposed Project:							
▪ Self-Storage (114.780 TSF Net Rentable Area)	189	6	6	12	10	10	20
Total Project Trip Generation Forecast	**189**	**6**	**6**	**12**	**10**	**10**	**20**

Notes:

- TE/TSF = Trip End per Thousand Square Feet

[1] Source: Trip rates based on *Trip Generation, 11th Edition, Institute of Transportation Engineers (ITE), Washington, D.C. (2021).*