

Recommend Approval of Scope with Access Analysis requested (see memo dated 2/7/22 from

Recommended By: A. Schlaff. Date: 2/7/22

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December 22, 2021

Ms. Chervl Tubbs. Vice President LILBURN CORPORATION 1905 Business Center Drive San Bernardino, California 92408

# RE: 2889 Locust Avenue Warehouse Project Level of Service and Vehicle Miles Traveled Screening Assessment

Project No. 19465

Dear Ms. Tubbs:

Ganddini Group, Inc. is pleased to provide this Level of Service and Vehicle Miles Traveled Screening Assessment for the proposed 2889 Locust Avenue Warehouse Project in the City of Rialto. The purpose of this analysis is to assess potential level of service (LOS) impacts for general plan compliance and vehicle miles traveled (VMT) impacts associated with the proposed project for compliance with California Environmental Quality Act (CEQA) requirements. We trust the findings of this analysis will aid you and the City of Rialto in assessing the project.

### PROJECT DESCRIPTION

The 4.81-acre project site is located at 2889 Locust Avenue, within the Rialto Airport Specific Plan, in the City of Rialto, California. The project site is currently undeveloped and zoned for planned industrial development (I-PID). The proposed project involves construction of a new 98,962 square foot warehouse building. The proposed project also includes 3 parking stalls for trucks, and 69 standard parking stalls. Access to the Project Site would be provided by two access driveways on Locust Avenue. The proposed site plan is shown in Attachment A.

#### **PROJECT TRIPS**

Table 1 shows the proposed project trips generation based on trip generation rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021), and, City of Rialto Traffic Impact Analysis Guidelines (December 2013) for truck mix by axle breakdown. Trip generation rates for ITE Land Use Code 150 (Warehouse) per thousand square feet was used for the building development.

As also shown in Table 1, the proposed project is forecast to generate a total of approximately 169 daily vehicle trips, including 16 vehicle trips during the AM peak hour and 17 vehicle trips during the PM peak hour. In passenger car equivalent (PCE) trips, the project is forecast to generate approximately 283 daily PCE trips, including 20 PCE trips during the AM peak hour and 21 PCE trips during the PM peak hour.

#### CRITERIA FOR THE PREPARATION OF TRAFFIC IMPACT ANALYSES

The project has been screened for level of service analysis using the City of Rialto established criteria, as specified in the City of Rialto *Traffic Impact Analysis Report Guidelines and Requirements*, adopted February 5, 2014 ["the City guidelines"] the and vehicle miles traveled analysis using the County of San Bernardino established criteria as specified in the County of San Bernardino *Transportation Impact Study Guidelines*, July 2019 ["the County guidelines"].

# LEVEL OF SERVICE SCREENING CRITERIA (NON-CEQA/GENERAL PLAN CONFORMITY)

As specified in the City guidelines, Exhibit A, the following types of development proposals are generally exempt from the requirement to prepare a Level of Service (LOS) transportation impact analysis:

9. Any propose d use which can demonstrate, based on the most recent edition of the Trip Generation Manual published by the Institute of Transportation Engineers (ITE) or other approved trip generation data, trip generation of less than 50 vehicle trips during the peak hours.

The proposed project is forecast to generate fewer than 50 peak hour trips. Assuming the project shall construct all on-site and off-site improvements (if any) in accordance with City design standards, the project would not create any new safety or operational concerns. Therefore, the proposed project does not warrant preparation of a transportation impact study with Level of Service analysis based on the County-established screening criteria.

#### VEHICLE MILES TRAVELED SCREENING CRITERIA (CEQA)

The VMT screening assessment has been prepared in accordance with the County guidelines, which were developed based on guidance from the Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (State of California, December 2018) ["OPR Technical Advisory"]. The County guidelines identify screening criteria for certain types of projects that typically reduce VMT and may be presumed to result in a less than significant VMT impact. The project need only satisfy one of the following screening criteria:

- Projects located within a Transit Priority Area (TPA)
  - $\ \ \square$  Projects located within one-half mile radius of major transit stop or high-quality transit corridor
- Projects located within a low VMT area
  - Site location can be verified with the web-based or map-based VMT Screening Tool
- Project Type Screening
  - Local serving land use
  - Retail land use projects which do not exceed 50,000 square feet of gross floor area
  - Existing projects and redevelopment projects up to 10,000 square feet
  - Projects with trip generate less than net new 110 daily vehicle trips (ADT)



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# **TPA SCREENING**

Projects located within a TPA, defined as within one-half mile of major transit stop<sup>1</sup> or high-quality transit corridor,<sup>2</sup> may be presumed to result in a less than significant VMT impact absent substantial evidence to the contrary. This presumption may not apply, however, if the project:

- 1. Has a Floor Area Ratio (FAR) of less than 0.75;
- 2. 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)
- 3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the SBCTA with input from the SCAG): or
- 4. Replaces affordable residential units with a smaller number of moderate or high-income residential units.

Based on review the of the San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool, the proposed project is not located within a TPA; therefore, the project does not satisfy the TPA screening criteria.

# LOW VMT AREA SCREENING

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. Based on the County-established thresholds, a project would satisfy the low VMT screening criteria if it is located in a traffic analysis zone (TAZ) that does not exceed four percent below the existing County of San Bernardino baseline VMT per service population.

To identify if the project is in a low VMT area, the SBCTA VMT Screening Tool was used. The SBCTA VMT Screening Tool was developed from the San Bernardino Transportation Analysis Model (SBTAM) travel forecasting model to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs). TAZs are geographic polygons similar to census block groups used to represent areas of homogenous travel behavior. Projects located in areas that incorporate similar features of the TAZ will tend to exhibit similar VMT. This presumption may not be appropriate if the project land uses would alter the existing built environment in such a way as to increase the rate or length of vehicle trips. Exhibit A shows the SBCTA VMT Screening Tool results for the project site.

As shown in Exhibit A below, the proposed project is consistent with existing land uses in the project TAZ and there does not appear to be anything unique about the project that would otherwise be mis-represented utilizing the data from the SBCTA VMT Screening Tool. Based on the SBCTA VMT Screening Tool assessment, the proposed project is located within TAZ 53741101. As shown on Exhibit A, the baseline year (2021) VMT per service population for the project TAZ is equal to 37 and the County-established threshold is equal to 28.3. Therefore, the proposed project does not satisfy the County-established screening criteria for projects located in low VMT areas without implementation of any project design features or mitigation measures that would reduce the project's baseline VMT.

<sup>&</sup>lt;sup>2</sup> Fixed route bus service with less than 15 minute headways during the peak commute hours (Pub. Resources Code, § 21155).



<sup>&</sup>lt;sup>1</sup> A major transit stop is defined as an existing rail transit station, ferry terminal with bus or rail service, or the intersection of two or more major bus routes with less than 15 minutes headways during the peak commute hours (Pub. Resources Code, § 21064.3.).

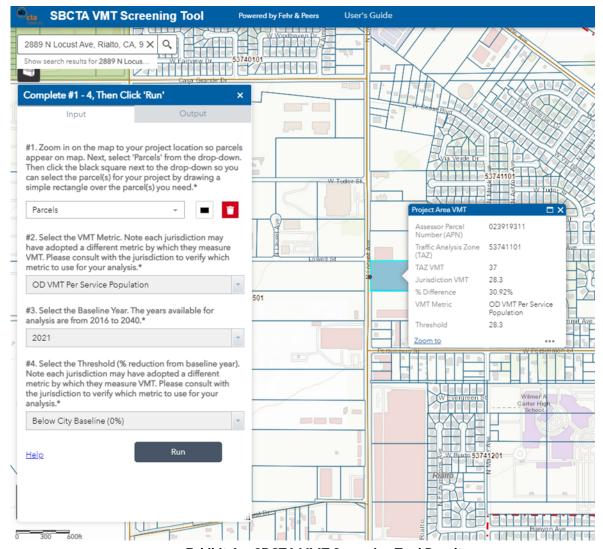


Exhibit A - SBCTA VMT Screening Tool Results

# **PROJECT TYPE SCREENING**

The County TIA Guidelines identify the following types of projects that may be presumed to have a less than significant VMT impact as they are local serving and thus can be expected to reduce VMT or they are small enough to have a negligible impact:

- Local parks
- Day care centers
- Local-serving retail uses less than 50,000 square feet, including:
  - Gas stations
  - Banks
- Student housing projects
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS



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- Existing projects or redevelopment of up to 10,000 additional square feet<sup>3</sup>
- Projects generating less than 110 daily vehicle<sup>4</sup> trips. This generally corresponds to the following "typical" development potentials:
  - 11 single family housing units
  - 16 multi-family, condominiums, or townhouse housing units
  - □ 10,000 sq. ft. of office
  - □ 15,000 sq. ft. of light industrial
  - □ 63,000 sq. ft. of warehousing
  - 79,000 sq. ft. of high cube transload and short-term storage warehouse

The OPR Technical Advisory guidance on the reduction of VMT for residential and employee related on-road passenger vehicles, specifically cars and light trucks. Heavy-duty trucks should only be included in a traffic impact analysis for modeling convenience and ease of calculation (e.g., where data provided combine auto and heavy freight VMT), but should not contribute to a finding of significant traffic (VMT) impact under any circumstances. As previously noted, proposed development project is forecast to generate a total of approximately 169 daily vehicle trips of which 102 are passenger vehicles (cars/light trucks). Consequently, the proposed project satisfies the project type screening criteria for low vehicle trip generation (excluding trucks), such that it may be presumed to result in a less than significant VMT impact in accordance with VMT established by the County of Riverside and OPR.

### **CONCLUSIONS**

The proposed project satisfies the City-established LOS screening criteria for low peak hour trip generation, and satisfies the County-established VMT screening criteria for low daily vehicle trip generation. Therefore, the proposed project may be exempt from Traffic Impact Analysis requirements based on City Guidelines and presumed to result in a less than significant VMT impact based on County Guidelines.

It has been a pleasure to assist you with this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 795-3100.

Sincerely, GANDDINI GROUP, INC.

Perrie Ilercil, P.E. (AZ) Senior Engineer



Giancarlo Ganddini, PE, PTP

Principal

<sup>&</sup>lt;sup>4</sup> The term vehicle refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty trucks should only be included in a traffic impact analysis for modeling convenience and ease of calculation (e.g., where data provided combine auto and heavy freight VMT), but should not contribute to a finding of significant traffic (VMT) impact under any circumstances.



<sup>&</sup>lt;sup>3</sup> As noted in OPR Technical Advisory, CEQA provides a categorical exemption for existing facilities and additions to existing structures up to 10,000 square feet so long as the project is in an area where public infrastructure is available to allow for maximum planning development and the project is not in an environmentally sensitive area (CEQA Guidelines, § 15301, subd. (e)(2).). Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

# Table 2 Project Trip Generation

Land Use: Warehousing

Size: 98.962 TSF

TRIP GENERATION RATES PER TSF <sup>1</sup>										
		AM Peak Hour			PM Peak Hour			Daily		
Vehicle Type	Source <sup>2</sup>	In	Out	Rate	In	Out	Rate	Rate		
All Vehicles	ITE 150	77%	23%	0.170	28%	72%	0.180	1.710		
Trucks Only	ITE 150/Rialto	52%	48%	0.020	52%	48%	0.030	0.684		
Passenger Car (88.2% AM, 83.3% PM, 60.0% Daily)		0.116	0.035	0.151	0.042	0.108	0.150	1.026		
Truck (11.8% AM, 16.7% PM, 40.0% Daily)		0.010	0.010	0.020	0.016	0.014	0.030	0.684		
Truck Mix:	Rialto									
2-Axle Trucks (2.0%)		0.000	0.000	0.000	0.000	0.000	0.000	0.014		
3-Axle Trucks (28.0%)		0.003	0.003	0.006	0.004	0.004	0.008	0.192		
4+ Axle Trucks (70.0%)		0.007	0.007	0.014	0.011	0.010	0.021	0.479		

VEHICLE TRIPS GENERATED								
	AM Peak Hour			PM Peak Hour				
Vehicle Type	In	Out	Total	In	Out	Total	Daily	
Passenger Car	11	3	14	4	11	15	102	
Trucks								
2-Axle Trucks	0	0	0	0	0	0	1	
3-Axle Trucks	0	0	0	0	0	0	19	
4+ Axle Trucks	1	1	2	1	1	2	47	
Subtotal	1	1	2	1	1	2	67	
Total Vehicle Trips Generated	12	4	16	5	12	17	169	

PCE <sup>3</sup> TRIPS GENERATED									
		AM Peak Hour		PM Peak Hour					
Vehicle Type	PCE Factor <sup>4</sup>	In	Out	Total	ln	Out	Total	Daily	
Passenger Car	1.0	11	3	14	4	11	15	102	
Trucks									
2-Axle Trucks	1.5	0	0	0	0	0	О	2	
3-Axle Trucks	2.0	0	0	0	0	0	0	38	
4+ Axle Trucks	3.0	3	3	6	3	3	6	141	
Subtotal		3	3	6	3	3	6	181	
Total PCE Trips Generated		14	6	20	7	14	21	283	

### Notes:

(1) TSF = Thousand Square Feet

(3) PCE = Passenger Car Equivalent



<sup>(2)</sup> ITE = Institute of Transportation Engineers *Trip Generation Manual* (11th Edition, 2021); ### = ITE Land Use Code. Rialto = City of Rialto Traffic Impact Analysis Report Guidelines and Requirements (December 2013). Per City of Rialto guidelines, 40% daily truck was used. ITE truck rates for AM and PM peak hours.

# ATTACHMENT A SITE PLAN

