

January 9, 2023

TTLIC Management Inc., an Arizona Corporation  
dba TTLIC Redlands Texas St., LLC  
c/o Brent Little  
Urban Advisory & Building Group, LLC  
2082 Michelson Drive  
Irvine, CA 92612  
[brent@urban-ab.com](mailto:brent@urban-ab.com)

LLG Reference: 2.22.4587.1

Subject: **VMT Impact Assessment for TTLIC Redlands Texas St., LLC  
Single-Family Residential Development Project  
(Tentative Tract Map No. 20520)  
Redlands, California**

Dear Mr. Little:

Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit the findings of this VMT Assessment associated with a proposed residential community to be developed by TTLIC Redlands Texas St., LLC (herein referred to as the “Project”) located in the City of Redlands, California. The subject property is located along the east side of Texas Street, approximately 500 feet north of Domestic Avenue.

The work plan summarized below is proposed for the preparation of a Traffic Impact Analysis and VMT assessment as required by Measure U and in compliance with the *City of Redlands CEQA Assessment VMT Analysis Guidelines*.

## PROJECT LOCATION AND DESCRIPTION

The Project site is a 14,69±-acre rectangular-shaped vacant parcel of land that is zoned Agricultural District – 1 and designated as Very Low Density Residential in the City’s General Plan. **Figure 1** presents a Vicinity Map, which illustrates the general location of the subject property and surrounding street system. **Figure 2** presents the existing aerial photograph of the Project site.

The proposed Project includes the development of 35 single-family residential dwelling units. Access to the Project site is proposed to be provided via three (3) cul-de-sacs (Street A, Street B and Street C) that would intersect with Texas Street,

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with a 4th cul-de-sac located at the northerly terminus of Texas Street. Streets A, B and C will be constructed to the City's local residential street standard with a paved width of 36-feet within a right-of-way of 60-feet. Texas Street will be constructed to ultimate half-section width per the City's residential collector standards (20-feet paved with 32-foot right-of-way), with an additional 14-feet of pavement. **Figure 3** presents the proposed Project site plan prepared by Huitt-Zollars.

## **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. There are three types of screening that lead agencies can apply to effectively screen projects from project-level assessment. The three screening methods recommended in the *City of Redlands CEQA Assessment VMT Analysis Guidelines* to determine if the Project will screen out include:

### **Project Screening**

#### **Step 1: Transit Priority Area (TPA) Screening**

The *City of Redlands CEQA Assessment VMT Analysis Guidelines* states that no further VMT impact analysis is required if:

*“Projects located within a TPA (i.e., within half-mile distance of existing major transit stop or an existing stop along a high-quality transit corridor) may be presumed to have a less than significant impact absent substantial evidence to the contrary. This presumption may NOT be appropriate if the 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”*

The proposed Project is not within a TPA due to not meeting the criteria. Therefore, the proposed Project would not screen-out since it is not within a TPA.

#### **Step 2: Low VMT Area Screening**

An excerpt from the *City of Redlands CEQA Assessment VMT Analysis Guidelines* states that no further VMT impact analysis is required if:

*“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.”*

The proposed Project is not within a low VMT-generating area. Therefore, the proposed Project would not screen-out.

### Step 3: Project Type Screening

The following guidance summarizes the potential project screening and would not have a significant transportation related CEQA impact per the *City of Redlands CEQA Assessment VMT Analysis Guidelines* per Step 3: Project Type Screening.

Projects 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. These 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)

This applies to projects with low trip generation per CEQA exemptions or results in a 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO<sub>2</sub>e) 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 35 single family homes, which is less than the “*Small Projects*” (< 3,000 MT CO<sub>2</sub>e) threshold of 167 dwelling units, 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

Consistent with the *City of Redlands CEQA Assessment VMT Analysis Guidelines*, the proposed Project includes development of 35 single family homes, will result in a less-than-significant transportation impact based on the “*Small Projects*” (< 3,000 MT CO<sub>2</sub>e) threshold of 167 dwelling units VMT screening criteria.

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We appreciate the opportunity to provide this VMT 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**

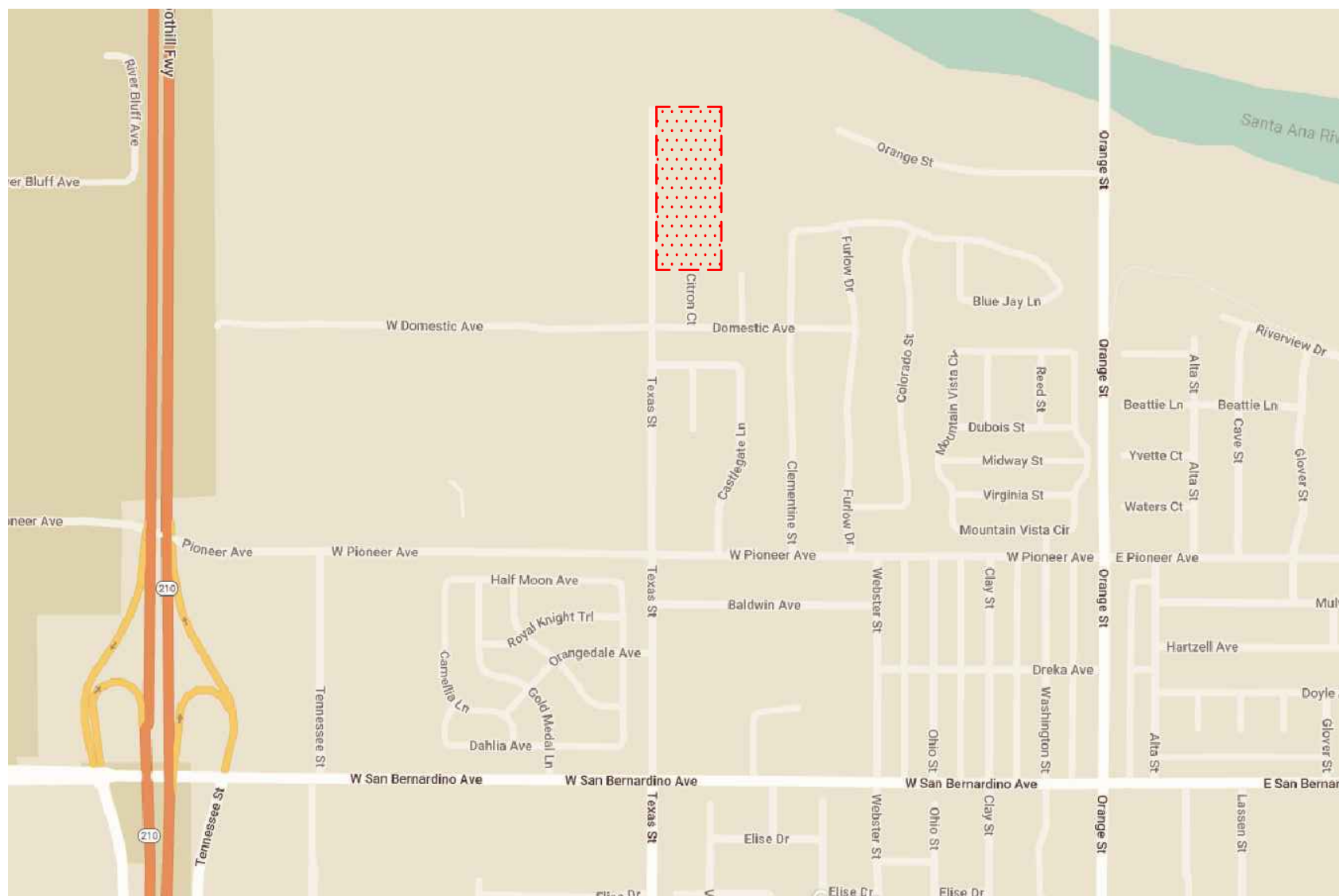


Richard E. Barretto, P.E.  
Principal

cc: Shane S. Green, P.E., Senior Transportation Engineer  
Jaren Nuzman, TKC Consulting, Inc.

Attachments





SOURCE: GOOGLE

KEY

 = PROJECT SITE

FIGURE 1

VICINITY MAP

TTLIC REDLANDS TEXAS RESIDENTIAL, REDLANDS





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SOURCE: GOOGLE

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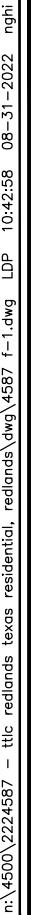
 = PROJECT SITE

**FIGURE 2**

**EXISTING SITE AERIAL**

TTLIC REDLANDS TEXAS RESIDENTIAL, REDLANDS





## PROPOSED SITE PLAN

TTLIC REDLANDS TEXAS RESIDENTIAL, REDLANDS

LINSOTT  
LAW &  
GREENSPAN



NO SCALE