



May 5, 2020

Ms. Tina Andersen
T&B Planning, Inc.
3200 El Camino Real, Suite 100
Irvine, CA 92602

**SUBJECT: GOODMAN LOGISTICS CENTER - FULLERTON VEHICLE MILES TRAVELLED (VMT)
ASSESSMENT**

Dear Ms. Tina Andersen:

The following Vehicle Miles Travelled (VMT) Assessment has been prepared for the Goodman Logistics Center - Fullerton development (referred to as "Project"), which is located on the northeast corner of Orangethorpe Avenue and Acacia Avenue in the City of Fullerton.

PROJECT DESCRIPTION

The proposed Project includes redevelopment of the Project site with an approximately 1,561,522 s.f. industrial logistics center consisting of four buildings (Buildings 1, 2, 3, and 4) on four separate lots. This includes approximately 1,456,522 s.f. of warehouse space and approximately 105,000 s.f. of office space (ground floor and mezzanine).

The Project Applicant has engaged in negotiations for the acquisition of an off-site, approximately 0.7-acre property located south of Building 3 and north of Orangethorpe Avenue. In the event the Project Applicant is able to acquire this property, Building 3 could be expanded to include approximately 47,862 s.f. of additional floor area (which would bring Building 3's total floor area to 543,152 s.f. and the proposed Project's total floor area to 1,609,384 s.f., including 1,504,384 s.f. of warehouse space and 105,000 s.f. of office space). The larger building area is the basis for this VMT assessment.

Existing structures and improvements on the Project site would be demolished to accommodate the proposed Project, with the exception of the existing City of Fullerton Water Department well facility; the easement for this facility would be expanded.

BACKGROUND

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which requires all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate takes effect July 1, 2020.

The City of Fullerton in coordination with other North Orange County cities is currently in the process of adopting a VMT screening tool to evaluate land use projects within North Orange

County also known as North Orange County Collaborative VMT Traffic Study Screening Tool (**Screening Tool**). The Screening Tool identifies the potential for individual projects to meet the established screening criteria and thus not require a detailed VMT analysis. The City of Fullerton intends to use the Screening Tool for the evaluation of future applicable projects. In coordination with the tool's developer, the City entered Project land use information to estimate project generated VMT. The results of the analysis are presented in Attachment A and indicate that the Project may meet one or more of the screening thresholds for land use projects identified in the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory). (1)

The focus of this memorandum is to more thoroughly evaluate each of the applicable screening thresholds to determine if the Project would be expected to cause a less-than-significant impact to VMT without requiring a more detailed VMT analysis.

PROJECT SCREENING

The Technical Advisory provides details on appropriate "screening thresholds" that can be used to identify when a proposed land use project is anticipated to result in a less-than-significant impact without conducting a more detailed analysis. Screening thresholds are broken into the following three types:

- Small Project Screening
- Low VMT Area Screening
- Transit Priority Area (TPA) Screening

A land use project need only to meet one of the above screening thresholds to result in a less-than-significant impact, and based on the Screening Tool results (see Attachment A), the project appears to meet one or both of the following screening thresholds:

- Low VMT Area Screening
- TPA Screening

LOW VMT AREA SCREENING

As noted in the Technical Advisory, "residential and office/industrial projects that locate in areas with low VMT and that incorporate similar features (density, mix of uses, and transit accessibility) will tend to exhibit similarly low VMT." (1) The Project is consistent with this criteria as the proposed industrial use is consistent with the existing area. The Screening Tool uses the sub-regional Orange County Transportation Analysis Model (OCTAM) to measure VMT performance within 7 North Orange County cities and for individual traffic analysis zones (TAZ's) within each city. The Project's physical location based on parcel number along with land use information is input into the Screening Tool to determine project generated VMT as compared to the City average. The results indicate that the Project is located within a low VMT area. Once a project is

confirmed to be within a low VMT area, the Technical Advisory also suggests that the traffic analyst ensure that the proposed Project is consistent with the land use assumptions contained in the travel demand model's traffic analysis zone (TAZ) used to measure VMT performance.

As identified in the Project's Notice of Preparation and Scoping Meeting, the Project site is within the Southeast Industrial Focus Area identified in the City of Fullerton General Plan, which is entitled *The Fullerton Plan 2030* (The Fullerton Plan), and has a Community Development Type (General Plan Land use designation) of Industrial. The proposed Project is consistent with the Industrial land use designation and the growth assumptions for the Southeast Industrial Focus Area anticipated in The Fullerton Plan.

Furthermore, based on a review of the socio-economic data contained within the Project's TAZ, the BAS_EMP or Basic (production/distribution) employment found in the current TAZ is consistent with industrial/warehouse type use, therefore the Project is consistent with the growth assumptions anticipated in The Fullerton Plan.

The Low VMT Area screening threshold is met.

TPA SCREENING

The Technical Advisory also notes that office/industrial projects within ½ mile of an existing "major transit stop"¹ or an existing stop along a "high-quality transit corridor"² will have a less than significant impact on VMT. According to the Screening Tool, the proposed Project is within a TPA. However, consistent with Technical Advisory guidance, secondary screening checks such as those shown below should also be considered.

A proposed land use project is not eligible for TPA screening if the project meets any of the following sub-criteria:

- 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 lead agency, with input from the Metropolitan Planning Organization); or
- 4) Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The proposed Project would not seem to meet TPA screening as its FAR is less than 0.75 and the

¹ Pub. Resources Code, § 21064.3 ("Major transit stop" means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").

² Pub. Resources Code, § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.").

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proposed parking supply for passenger cars is 1,205 spaces while the City Municipal Code would only require 1,174 spaces for the shell building. Additional spaces are provided to accommodate unknown future build out.

The TPA screening threshold is not met.

CONCLUSION

Based on our review of applicable VMT screening thresholds, the Project meets the low VMT area screening criteria and would therefore be assumed to exhibit similar levels of low VMT. The Project was not found to meet each of the sub-criteria for TPA screening, however meeting the low VMT area screening alone is sufficient to determine a less-than-significant impact; no additional VMT analysis is required.

If you have any questions, please contact me directly at (949) 336-5978.

Respectfully submitted,

URBAN CROSSROADS, INC.



Aric Evatt, PTP
President



Robert Vu, PE
Transportation Engineer

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REFERENCES

1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.

**ATTACHMENT A: NORTH ORANGE COUNTY COLLABORATIVE VMT TRAFFIC STUDY
SCREENING TOOL**

NOCC+



North Orange County Collaborative VMT Traffic Study Screening Tool

Project Information

Project Name	Opening Year
Goodman Logistics Center	2020
Parcel Number	
073-120-31, 073-120-33, 073-120-09	

Screening Criteria

Is the project location in a Transit Priority Area?

Is the project location in a low VMT generating zone?

Is the Project one of these land use types?

Does the project generate fewer than 110 daily trips?
(enter project land use in the section below)

The Project can be considered for screening from additional analysis. Please refer to the 'secondary screening checks' table in the User Guide.

Project Land Use Information

		Unit
Residential: Single Family Homes	0	Dwelling Units
Residential: MultiFamily Homes	0	Dwelling Units
Office	0.000	1,000 Square Feet
Retail	0.000	1,000 Square Feet
Industrial	1609.384	1,000 Square Feet
Private School	0	Students
University	0	Students
Entertainment	0.000	1,000 Square Feet
Hotel	0	Rooms

Project Trips and VMT Information

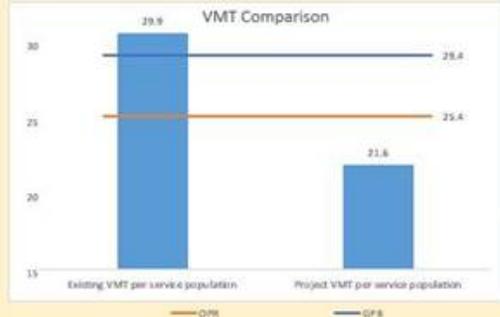
VMT Methodology

Daily Trips: 3280 Average Trip Length: 10.6 Service Population: 1609

VMT per service population 21.6

Project VMT Thresholds Comparison

- OPR Guidance (15% Below Existing)
- GHG Reduction Targets (14.3% Below Existing)
- Below Existing
- Better than General Plan Buildout



FEHR PEERS