



Email Transmittal

DRAFT

September 27, 2021

Jesus "Freddie" Olmos
Senior Environmental Scientist/CEQA Group Manager
ECORP Consulting, Inc.
215 N. Fifth Street
Redlands, CA 92374

Re: VMT Screening Technical Memorandum for the Victorville Wellness Center Campus
Project, City of Victorville

Dear Freddie,

ECORP Consulting, Inc. is assisting with the preparation of an Initial Study (IS)/Mitigated Negative Declaration (MND) for the development of the Victorville Wellness Center Campus, an emergency shelter for homeless individuals on numerous City-owned parcels at 16902 First Street in the City of Victorville (the "City"). The project would consist of the construction of an approximately 168-bed facility with supportive services, including a cafeteria, clinic, office, and laundry services, as well as a 30-unit micro-housing community (the "Project"). As shown in Figure 1, Project Site Location Map, the Project site is bounded by the Interstate-15 (I-15) freeway to the north, the Mojave River to the east, and residential uses on 1st Street, River Street, and Cottonwood Street to the west and south. The area surrounding the Project site primarily consists of industrial and residential uses to the southwest, the I-15 freeway to the northwest, and open space to the east. The Project site lies at the edge of the Mojave Desert, north of the San Bernardino Mountains. In order to determine the level of transportation analysis required for the Project, a VMT screening assessment has been performed and is presented in this technical letter.

PROJECT DESCRIPTION

The conceptual site plan is shown in Figure 2. The primary goal of the Project is to provide the City's homeless population with a safe and supportive environment in which they can have access to the housing and services they need in order to transition into stable, long-term housing conditions. Phase 1 of the proposed Project would consist of 23,360 square feet of building space in four separate residential buildings (each measuring 2,240 square feet), one behavioral health building (measuring 2,240 square feet), two recuperative care buildings (each measuring 2,240 square feet), a cafeteria (measuring 2,880 square feet), three office buildings (each measuring 1,440 square feet), and a laundry facility (measuring 480 square feet). Parking for the Project would be provided within a surface level parking lot. The proposed mix of housing units would provide approximately 168 beds for residents. The Project would also feature residential amenities, including a wellness center, clinic, laundry services, and office. Phase 2 of the proposed Project



would consist of a micro-housing community for the purpose of providing permanent affordable housing adjacent to the Wellness Center. The affordable housing community would consist of 30 units measuring 320 square feet each. Additional parking and associated facilities would also be included in Phase 2. In order to provide a conservative analysis, the uses associated with the development of both Phases 1 and 2 were incorporated into the VMT screening assessment.

The Project site currently consists of seven vacant City-owned parcels at the northern extent of Cottonwood Street, River Street, and 1st Street. These parcels would be cleared to accommodate the development of the Project uses. The Project is anticipated to be constructed and operational in 2023.

Project access/egress would be provided via a full-access driveway along 1st Street. The driveway would extend from the northern end of 1st Street at the southeast corner of the Project site, adjacent to the parking lot for Eva Dell Park. The driveway would provide access to the residential parking spaces in the Project's surface parking lot. A pick-up/drop-off turnaround would be provided at the southeast corner of the Project site to accommodate both passenger vehicle and bus loading activities. The Project would provide a total of 39 parking spaces (27 standard spaces, four Americans with Disabilities Act [ADA] accessible spaces, four reserved for electric vehicle (EV) charging, and four reserved for carpool vehicles). The Project would also provide up to 8 long-term and 6 short-term bicycle parking spaces. Long-term bicycle parking would be located adjacent to the entry plaza of the central courtyard, on the western side of the site. Short-term bicycle parking would be provided adjacent to the surface parking lot.

VMT ANALYSIS SCREENING CRITERIA

As of July 1, 2020, all land use projects within the State of California are required to prepare a VMT analysis. In June 2020, City Council of the City of Victorville adopted VMT Analysis Guidelines under which the transportation-related impacts of development projects are to be analyzed. These Guidelines provide screening criteria in order to determine if a VMT analysis would be required for a development project. The two screening criteria outlined in the VMT Analysis Guidelines are listed below:

1. The project generates less than 1,285 net daily trips.
2. The project consists of any of the following land use types:
 - Single family or multifamily residential uses of 136 dwelling units or less
 - Office space of less than 227,000 square feet
 - Retail space of less than 122,000 square feet
 - Warehousing of less than 829,000 square feet
 - Light industrial use of less than 296,000 square feet
 - K-12 public schools
 - Daycare/Childcare/Pre-K use
 - Affordable housing
 - Student housing
 - Community institutions, social services, and public buildings

These screening criteria were applied to the proposed Victorville Wellness Center uses in order to determine if further analysis would be required to evaluate the Project's VMT impact.



PROJECT TYPE SCREENING ASSESSMENT

The Project uses were first reviewed in order to determine if the proposed uses are included within the screening criteria list of land use types provided in the City's VMT Analysis Guidelines. The Project Phase 1 uses consist of residential buildings to provide housing for homeless persons and the supportive services they may need. These uses can be considered to be social service uses as they will cater to the needs of the City's homeless population and will work to combat the affordable housing crisis. In addition, Phase 2 of the Project consists of the development of a micro-housing community to provide permanent affordable housing units adjacent to the Wellness Center. The VMT Analysis Guidelines specifically outline affordable housing as a use that does not require additional VMT analysis. Therefore, since uses associated with both Phases 1 and 2 of the proposed Project are included on the City's list of land use types that do not require further VMT analysis, the Project can be assumed to have a less-than-significant VMT impact.

PROJECT TRIP GENERATION SCREENING ASSESSMENT

In addition to the evaluation of the Project's proposed land use types, the Project's trip generation was calculated to determine whether the Project would generate in excess of the City's threshold of 1,285 weekday daily trips that would require further VMT analysis. The net Project trip generation was calculated based on trip generation rates from the Institute of Transportation Engineers (ITE) and the State of California Department of Transportation (Caltrans) for the weekday daily and peak-hour trip generation. The methodology and results of this approach are summarized below.

TRIP GENERATION RATES AND CALCULATION

Traffic-generating characteristics of many land uses, including the residential and institutional uses proposed for the Project, have been surveyed and documented in studies conducted under the auspices of ITE. This information is available in the *Trip Generation Manual* (10th Edition, 2017), published by ITE. The trip generation rates in the ITE manual are nationally recognized, and are used as the basis for most traffic studies conducted in the City of Victorville and the surrounding region. Based on the unique characteristics of the proposed Project, information was obtained from the *Trip Generation Manual* for ITE Land Use Code (LUC) 254, Assisted Living, for the uses proposed as part of Phase 1 of the Project. This land use from the ITE manual was determined to be the most similar to the proposed Project uses as it accounts for the residential component and ancillary assistive services provided on the site. The General Urban/Suburban setting trip rates were selected for use, given that those rates are based on vehicle trip data collected at sites with little, if any, transit, pedestrian, and bicycle accessibility.

In addition, Caltrans prepared a memorandum summarizing trip generation rates for affordable housing uses within the State. The rates from this study were used to determine the trip generation potential of the proposed affordable housing uses included in Phase 2 of the Project. Since this study provided only weekday peak-hour trip generation rates, supporting trip generation information for multifamily residential and affordable housing uses from the ITE *Trip Generation Manual* and the City of Los Angeles Department of Transportation (LADOT) *Transportation Assessment Guidelines* (July 2020) were used to determine the weekday daily trip generation rate and the weekday peak hour directional distribution of trips for the Project affordable housing component.

For this analysis, the trip generation rates provided in Table 1 were used to determine the weekday daily and AM and PM peak-hour trips generated by the proposed Project uses. To be conservative, the Project trip generation estimation did not include transit/walk-in or pass-by trip adjustments. The Project trip



generation summary is presented in Table 1. As shown, based on the proposed Project land use types and sizes, the Project would generate approximately 637 weekday daily vehicle trips, including 48 and 56 trips during the AM and PM peak hours, respectively. Thus, the Project will generate less than the City's screening criteria of 1,285 net daily vehicle trips and does not require additional VMT analysis. Thus, based on the Project trip generation, the Project can also be assumed to have a less-than-significant VMT impact.

**Table 1
Project Trip Generation**

Land Use	ITE Code	Intensity ³	Average Weekday	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation Rates									
Assisted Living ¹	254	1 bed	2.60	63%	37%	0.19	38%	62%	0.26
Affordable Housing ²	-	1 du	6.67	38%	62%	0.53	55%	45%	0.40
Trip Generation Summary									
Description	Size	Average Weekday	AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
PROPOSED USES									
<i>Residential</i>									
Assisted Living		168 bed	437	20	12	32	17	27	44
Affordable Housing		30 du	200	6	10	16	7	5	12
Proposed Project Trips			637	26	22	48	24	32	56

Notes:

- 1) ITE *Trip Generation Manual* (10th Edition, 2017) trip generation rates and directional distributions applied for Land Use Codes 254 (Assisted Living). The General Urban/Suburban setting was selected as most appropriate for the Project location. Transit/walk adjustments were not applied.
- 2) Peak-hour trip generation rates based on Caltrans *Affordable Housing Trip Generation Strategies and Rates* (2018). Daily trip generation rates not provided in the Caltrans study for affordable housing use. Daily trip rate estimated by developing a Daily-to-(AM+PM peak hour) factor based on ITE LUC 220 (Multifamily Housing [Low-Rise]) and applying this factor to the affordable housing (AM+PM) peak-hour trip rate. Peak-hour directional distribution not provided for affordable housing use in Caltrans study. Directional distribution of trips assumed from the LADOT *Transportation Assessment Guidelines* (July 2020) for the Average Family Affordable Housing use.
- 3) bed = beds; du = dwelling units

PROJECT TRANSPORTATION IMPACTS

Per the City's Guidelines, additional VMT analysis is required when a project is likely to generate 1,285 or more net weekday daily vehicle trips to the local street system and when the Project uses do not align with the City's list of screened land use types. Given that the Project is estimated to generate 637 net daily vehicle trips on a typical weekday and the Project uses are listed by the City to not require additional VMT analysis, the Project is not expected to result in significant VMT impacts to the surrounding transportation system. Therefore, no further VMT analysis of transportation impacts is required for the Project.

Please contact me if you have any questions.

Sincerely,

Daniel Hendricks
Associate Planner

DH
C22749

FIGURES

1. PROJECT SITE LOCATION MAP
2. CONCEPTUAL PROJECT SITE PLAN



FIGURE 1

9/22/2021

FN: JC18101VICTORVILLEWELLNESSCENTER\GRAPHICS\PROJ-LOCATION

PROJECT SITE LOCATION MAP

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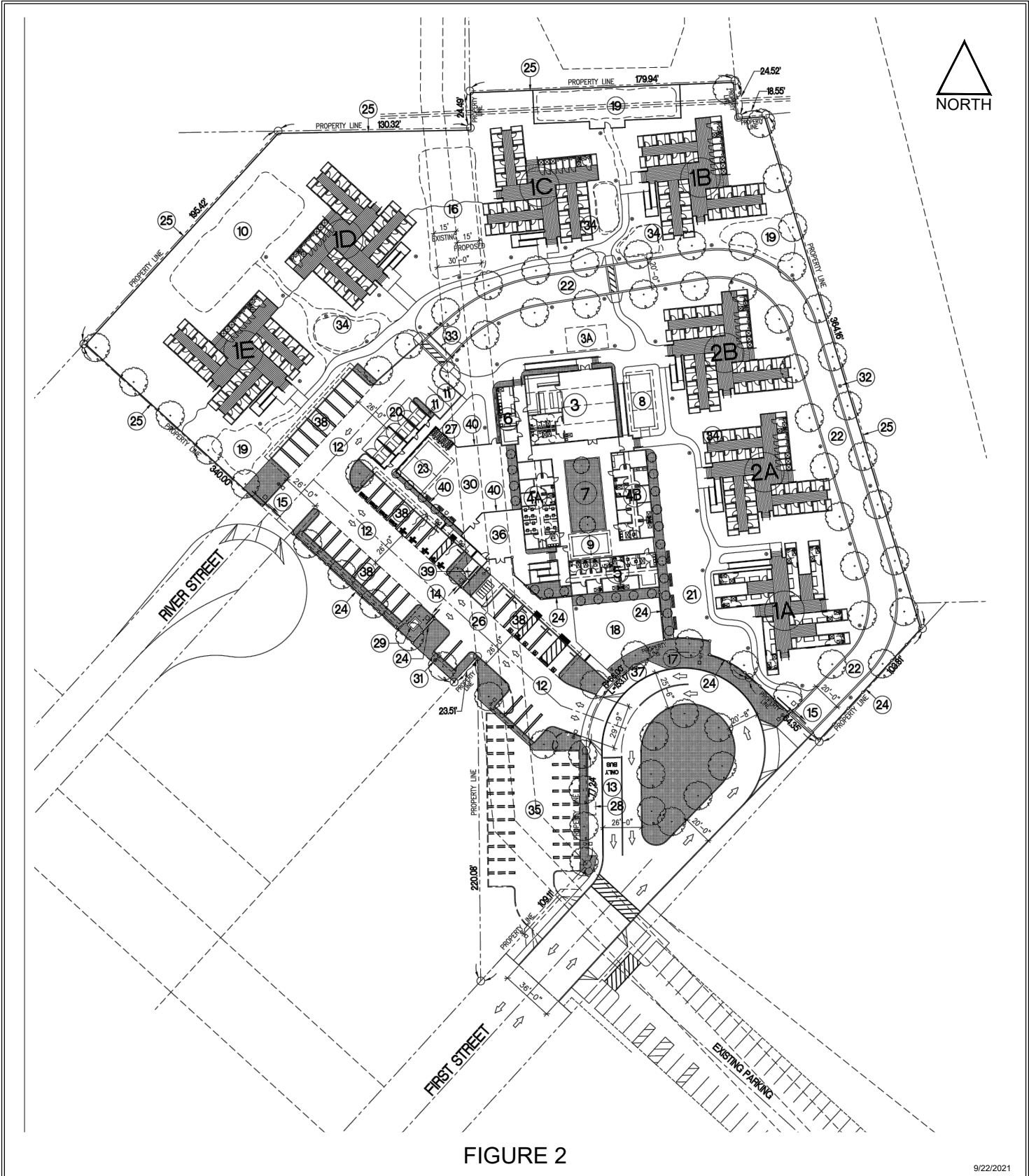


FIGURE 2

9/22/2021

FN: JC18101VICTORVILLEWELLNESSCENTERIGRAPHICSSITE-PLAN

CONCEPTUAL PROJECT SITE PLAN

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