



June 2, 2021

Mr. Michael Morris
Village Partners
4340 Von Karman Ave., Ste 110
Newport Beach, CA 92660

SUBJECT: STATE STREET VILLAGE VEHICLE MILES TRAVELLED (VMT) SCREENING EVALUATION

Dear Mr. Michael Morris:

The following Vehicle Miles Travelled (VMT) Screening Evaluation has been prepared for the proposed State Street Village development (**Project**), which the project site is located at the block bounded by Redlands Boulevard, Orange Street, Citrus Avenue, and Eureka Street and an out parcel bounded by Citrus Avenue, Fourth Street, a public alley, and Eureka Street in the City of Redlands.

PROJECT OVERVIEW

The proposed Project would redevelop the 12.25-acre site, remove the existing shopping mall, a stand-alone retail building, and parking lot site improvements, and construct a total of approximately 695 multi-family residential units in four 3, 4, and 5 story buildings. The residential units include studio, one-bedroom, two-bedroom, and three-bedroom floor plans that range from 450 sq. ft. to 1,250 sq. ft. 73,000 sq. ft. of ground floor retail space beneath residential units and 12,000 sq. ft. of upper floor office space and a roof top restaurant are included. A 657 stall 6-level parking structure and two single level sub-terranean parking structures with 276 and 259 stalls are included. A public green space fronting Third Street is also included. A stand-alone 6,000 sq. ft. two-story recreational amenity building with resort style pool is included. A drugstore of 14,600 sq. ft with drive through and surface parking lot is planned for the out-parcel site. The Project would include a Code Text Amendment of the existing C-3 zoning designation eliminating reference to residential R-3 zoning to allow residential density to exceed the density of R-3 and amend the parking requirements to be consistent with the Transit Villages Specific Plan.

BACKGROUND

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a [Technical Advisory on Evaluating Transportation Impacts in CEQA](#) (December of 2018) (**Technical Advisory**). (1) Based on OPR's Technical Advisory, the San Bernardino County Transportation Authority (SBCTA) prepared the [SBCTA Countywide SB 743 VMT Implementation Study](#) (February 2020) to assist its member agencies with implementation tools necessary to adopt analysis

methodology, impact thresholds and mitigation approaches for VMT. Included in this work effort, SBCTA in February 2020 also released to each of its member agencies Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (SBCTA Guidelines) (2), which provides a template of specific procedures for complying with the new CEQA requirements for VMT analysis. (2) Based on the SBCTA Guidelines, the City of Redlands CEQA Assessment VMT Analysis Guidelines (July 2020) (**City Guidelines**) (3), which documents the City's VMT analysis methodology and approved impact thresholds. The VMT screening evaluation presented in this report has been developed based on the adopted City Guidelines.

PROJECT SCREENING

The City Guidelines 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 four types:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Project Type Screening

A land use project need only to meet one of the above screening thresholds to result in a less-than-significant impact.

STEP 1: TPA SCREENING

Consistent with guidance identified in the Technical Advisory and City Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing “major transit stop”¹ or an existing stop along a “high-quality transit corridor”²) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a 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.

Based on the Screening Tool results presented in Attachment A, the Project site is located within ½ mile of an existing major transit stop, and along a high-quality transit corridor. Additionally, the Project

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.”).

would meet the aforementioned secondary criteria of having a FAR of greater than 0.75, the parking supplied by the Project is not in excess of the City's parking code, the Project is consistent with the adopted RTP/SCS, and the Project is not replacing affordable residential units with a smaller number of market rate residential units.

TPA screening criteria is met.

STEP 2: LOW VMT AREA SCREENING

As noted in the City Guidelines, residential and office 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. The Screening Tool uses the sub-regional San Bernardino Transportation Analysis Model (SBTAM) to measure VMT performance within individual traffic analysis zones (TAZ's) within the region. The Project's physical location based on parcel number was input into the Screening Tool to determine the TAZ's VMT as compared to the County average. The parcel containing the proposed Project was selected and the Screening Tool was run for VMT per service population (i.e., population and employment) measure of VMT. Based on the Screening Tool results presented in Attachment A, the Project is not located within an already low VMT generating TAZ.

Low VMT Area screening criteria is not met.

STEP 3: PROJECT TYPE SCREENING

The City Guidelines identifies projects that are consistent with the current Sustainable Communities Strategy (SCS) or general plan, and that generate less than 3,000 metric tons of CO₂e per year can be presumed to have a less-than-significant impact on VMT, subject to discretionary approval by the City. Based on substantial evidence provided in the City Guidelines, multifamily residential (mid-rise) 299 dwelling units or fewer and local serving retail with no stores larger than 50,000 square feet. The Project's retail components (i.e., ground floor retail, drugstore, rooftop restaurant) would meet the project type screening as any single store does not exceed the adopted 50,000 square feet threshold. However, the Project's residential component exceeds this dwelling unit threshold, the Project would not be eligible to screen out based on project type screening.

Project Type screening criteria is met for the Project's retail component only.

CONCLUSION

Based on our review of applicable VMT screening thresholds, the Project meets the TPA screening criteria and would therefore be presumed to result in a less than significant VMT impact. Additionally, the Project would meet Project Type screening for the local serving retail component of the Project. As such, no additional VMT analysis is required and a less than significant impact would occur.

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If you have any questions, please contact me directly at (949) 660-1994.

Respectfully submitted,

URBAN CROSSROADS, INC.

A handwritten signature in black ink, appearing to read 'Alex So', with a long horizontal flourish extending to the right.

Alex So
Senior Analyst

Mr. Michael Morris
Village Partners
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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.
2. **San Bernardino County Transportation Authority (SBCTA).** *Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment.* February 2020.
3. **City of Redlands.** *CEQA Assessment VMT Analysis Guidelines.* July 2020.

**ATTACHMENT A:
SCREENING TOOL**

SBCTA VMT Screening Tool Powered by Fehr & Peers User's Guide

E Citrus Ave & S Eureka St, Redlands

Show search results for E Citrus Ave ...

Complete #1 - 4, Then Click 'Run'

#2. Select the VMT Metric. Note each jurisdiction may have adopted a different metric by which they measure VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*

OD VMT Per Service Population

#3. Select the Baseline Year. The years available for analysis are from 2016 to 2040.*

2016

#4. Select the Threshold (% reduction from baseline year). Note each jurisdiction may have adopted a different metric by which they measure VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*

Below County Baseline (-15%)

Project Area VMT (1 of 4)

Assessor Parcel Number (APN)	017105303
Traffic Analysis Zone (TAZ)	53834303
TAZ VMT	95.3
Jurisdiction VMT	32.7
% Difference	191.87%
VMT Metric	OD VMT Per Service Population
Threshold	27.8

[Zoom to](#) ...

Map Layers

- Project Area VMT
- Screening Results
- Low VMT Generating TAZs
- Parcels
- Jurisdiction Boundaries
- TAZ
- Transit Priority Area

0 300 600ft

Loma Linda University, City of