May 27, 2021

Mr. Matthew Gevergiz
Frontier Communities
2151 E. Convention Center Way Suite 114
Ontario, CA 91764

SUBJECT: MANGO AND SOUTH HIGHLAND RESIDENTIAL VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION

Dear Mr. Matthew Gevergiz:

The following VMT Analysis has been prepared for the proposed Mango and South Highland Residential development (**Project**), which is the southwest corner of Mango Avenue and South Highland Avenue in the City of Fontana.

PROJECT DESCRIPTION

The proposed Project includes the development of 107 multifamily housing (low-rise) dwelling units.

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) 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 provided a template of specific procedures for complying with the new CEQA requirements for VMT analysis. (2) Based on the SBCTA Guidelines, the City of Fontana adopted Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (**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 describe specific "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 project level VMT analysis. Screening thresholds are described in the following four steps:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Low Project Type Screening
- Step 4: Project net daily trips less than 500 ADT

Consistent with City Guidelines a land use project needs only to satisfy one of the above screening thresholds to result in a less than significant impact.

For the purposes of this analysis, the initial VMT screening process has been conducted with the SBCTA VMT Screening Tool (**Screening Tool**), which uses screening criteria consistent with the screening thresholds recommended in the Technical Advisory and City Guidelines.

STEP 1: TPA SCREENING

Consistent with guidance identified in the 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 not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor.

TPA screening criteria is not met.

STEP 2: LOW VMT AREA SCREENING

As noted in the City Guidelines, "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

[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.").

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." [3] The Screening Tool uses the sub-regional San Bernardino County Transportation Analysis Model (SBTAM) to measure VMT performance within San Bernardino County for individual traffic analysis zones (TAZ's) within each city. The Project's physical location based on APN is input into the Screening Tool to determine the VMT generated within the respective TAZ as compared to the jurisdictional average inclusive of a particular threshold (e.g., 15% below baseline County of San Bernardino VMT per service population). The results are displayed in Attachment A, which indicates that the Project TAZ generates 25.7 VMT per service population for baseline conditions. SBCTA maintains baseline and horizon year VMT per service population values for each of its member agencies as calculated from the SBTAM model. Urban Crossroads has obtained these values from SBCTA to use in this assessment. The baseline County of San Bernardino VMT per service population is 32.7. The Project's TAZ is found to generate VMT per service population at a level of 21.4% below the baseline County of San Bernardino.

Low VMT Area screening criteria is met.

STEP 3: LOW PROJECT TYPE SCREENING

The City Guidelines identify that local serving retail with buildings less than 50,000 square feet or other local serving essential services (e.g., day care centers, public schools, medical/dental office buildings, etc.) are presumed to have a less than significant impact absent substantial evidence to the contrary. The proposed Project is not considered a local serving use based on the examples provided in the City Guidelines.[4]

Low Project Type screening criteria is not met.

STEP 4: PROJECT NET DAILY TRIPS LESS THAN 500 ADT SCREENING

Projects that generate fewer than 500 average daily trips (ADT) (stated in actual vehicles) are deemed to not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT. Substantial evidence in support this daily trip threshold is documented in the City Guidelines.[5] Trip generation rates and a summary of daily vehicle trips for the Project are presented in Attachment B of this memorandum. The trip generation rates used for this analysis are based on the trip generation statistics published in the Institute of Transportation Engineer (ITE) Trip Generation Manual (10th Edition, 2017). (4) The Project anticipated to generate 784 vehicle trip-ends per day which would exceed the City's screening threshold of 500 ADT.

Project net daily trips less than 500 ADT screening criteria is not met.

[3] City Guidelines; Page 12.
[4] City Guidelines; Page 13.
[5] City Guidelines; Appendix B.

CONCLUSION

The Project was found to meet the low VMT screening criteria. In addition, the Project is consistent with the adopted General Plan and is consistent with the growth projections assumed in the regional RTP/SCS. Therefore, the Project would result in a less than significant impact for VMT; no further VMT analysis required.

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

Respectfully submitted,

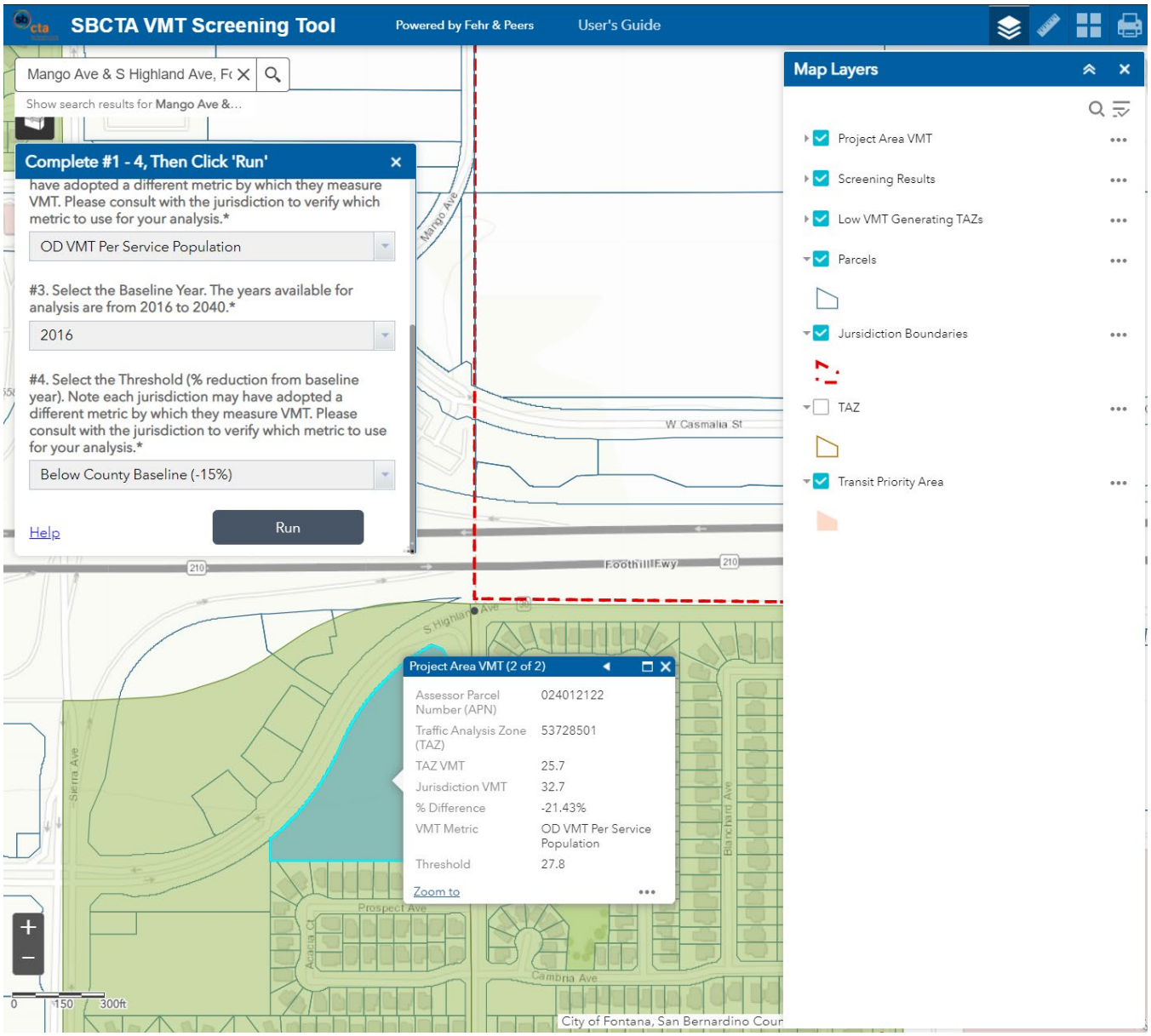
URBAN CROSSROADS, INC.

Alexander So
Senior Analyst

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 Fontana Traffic Engineering Division.** *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment.* City of Fontana : s.n., October 2020.
4. **Institute of Transportation Engineers.** *Trip Generation Manual.* 10th Edition. 2017.

ATTACHMENT A
SBCTA VMT SCREENING TOOL



	SBTAM Base Year - 2016		SBTAM Horizon Year - 2040	
GEOGRAPHY	**VMT All Vehicles**		**VMT All Vehicles**	
	Total VMT	**VMT per Service Pop**	**Total VMT**	**VMT per Service Pop**
San Bernadino County	95,594,182	32.7	132,268,982	35.3

ATTACHMENT B
PROJECT TRIP GENERATION

TABLE 1: PROJECT TRIP GENERATION SUMMARY

Land Use[1]	ITE LU Code	Units[2]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Project Trip Generation Rates:									
Multifamily Housing (Low-Rise)	220	DU	0.11	0.35	0.46	0.35	0.21	0.56	7.32

Land Use	Quantity	Units[2]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Project Trip Generation Summary:									
Multifamily Housing	107	DU	11	38	49	38	22	60	784

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).

[2] DU = Dwelling Units