

November 1, 2021

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

**SUBJECT: SIERRA INDUSTRIAL (SHEA) VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION**

Dear Ms. Tracy Zinn:

The following VMT Analysis has been prepared for the proposed Sierra Industrial (Shea) development (**Project**), which is generally located east of Sierra Avenue and north of Casa Grande Drive in the City of Fontana.

## **PROJECT DESCRIPTION**

The “Shea” project involves construction of a 203,000 square foot warehouse building. (See Attachment A)

## **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 specific procedures for complying with the new CEQA requirements for VMT analysis the City of Fontana adopted [Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment \(City Guidelines\)](#) (2), which documents the City’s VMT analysis methodology and adopted VMT impact thresholds. The VMT screening evaluation presented in this report has been developed based on these 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. 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 City Guidelines. 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.

### **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”<sup>1</sup> or an existing stop along a “high-quality transit corridor”<sup>2</sup>) 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 B, 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 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.”<sup>3</sup> The Screening Tool uses the sub-regional San Bernardino County Transportation Analysis Model (SBTAM) to measure VMT

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<sup>1</sup> 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.”).

<sup>2</sup> 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.”).

<sup>3</sup> City Guidelines; Page 12.

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 (i.e., 15% below baseline County of San Bernardino VMT per employee). Based on the Screening Tool results, the Project is not located within a low VMT generating zone as compared to the City's adopted threshold of 15% below baseline County of San Bernardino VMT per employee. (See Attachment B).

**Low VMT Area screening criteria is not 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.<sup>4</sup>

**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 net 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.<sup>5</sup> 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 (11<sup>th</sup> Edition, 2021). (3) The proposed Project is estimated to generate 378 vehicle trip-ends per day; which would not exceed the City's screening threshold of 500 ADT.

**Project net daily trips less than 500 ADT screening criteria is met.**

## **CONCLUSION**

Based on our findings, the Project was found to meet the project net daily trips less than 500 ADT screening criteria and is presumed to result in a less than significant impact for VMT; no further VMT analysis required.

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<sup>4</sup> City Guidelines; Page 13.

<sup>5</sup> City Guidelines; Appendix B.

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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 'Alexander So', with a long horizontal flourish extending to the right.

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. **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.
3. **Institute of Transportation Engineers.** *Trip Generation Manual.* 11th Edition. 2021.

**ATTACHMENT A**  
**PRELIMINARY SITE PLAN**



**ATTACHMENT B**  
**SBCTA VMT SCREENING TOOL**

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

Duncan Canyon Rd & Sierra Ave X

Show search results for Duncan Cany...

**Complete #1 - 4, Then Click 'Run'**

VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.\*

PA VMT Per Worker

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

2021

#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%)

[Help](#) **Run**

**Project Area VMT (2 of 2)**

Assessor Parcel Number (APN)	023915138
Traffic Analysis Zone (TAZ)	53740301
TAZ VMT	19.4
Jurisdiction VMT	17
% Difference	14.47%
VMT Metric	PA VMT Per Worker
Threshold	14.4

[Zoom to](#)

**Map Layers**

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

City of Fontana, San Bernardino County, Bureau

**ATTACHMENT B**  
**PROJECT TRIP GENERATION**

**TABLE 1: PROJECT TRIP GENERATION RATES**

Land Use <sup>1</sup>	Units <sup>2</sup>	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
<b>Actual Vehicle Trip Generation Rates</b>									
High-Cube Fulfillment Center (Non-Sort) <sup>3</sup>	TSF	155	0.122	0.028	0.150	0.062	0.098	0.160	1.810
Passenger Cars			0.105	0.025	0.130	0.059	0.091	0.150	1.580
2-Axle Trucks			0.002	0.001	0.003	0.001	0.001	0.002	0.038
3-Axle Trucks			0.002	0.002	0.004	0.001	0.001	0.002	0.048
4+Axle Trucks			0.006	0.007	0.013	0.003	0.003	0.006	0.144
High-Cube Cold Storage Warehouse <sup>3</sup>	TSF	157	0.085	0.025	0.110	0.034	0.086	0.120	2.120
Passenger Cars			0.062	0.018	0.080	0.025	0.065	0.090	1.665
2-Axle Trucks			0.003	0.007	0.010	0.005	0.005	0.010	0.260
3-Axle Trucks			0.001	0.002	0.003	0.002	0.001	0.003	0.083
4+Axle Trucks			0.005	0.011	0.016	0.008	0.008	0.016	0.113

<sup>1</sup> Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

<sup>2</sup> TSF = thousand square feet

<sup>3</sup> Truck Mix: South Coast Air Quality Management District's (SCAQMD) recommended truck mix, by axle type.  
 Normalized % - Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks.  
 Normalized % - With Cold Storage: 34.7% 2-Axle trucks, 11.0% 3-Axle trucks, 54.3% 4-Axle trucks.

**TABLE 2: PROJECT TRIP GENERATION SUMMARY**

Land Use	Quantity Units <sup>1</sup>	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
High-Cube Cold Storage (10%)	20.300 TSF							
Passenger Cars:		1	0	1	1	1	2	34
2-axle Trucks:		0	0	0	0	0	0	6
3-axle Trucks:		0	0	0	0	0	0	2
4+-axle Trucks:		0	0	0	0	0	0	2
Total Truck Trips (Actual Vehicles):		0	0	0	0	0	0	10
Total Trips (Actual Vehicles) <sup>2</sup>		1	0	1	1	1	2	44
High-Cube Fulfillment (Non-Sort) (90%)	182.700 TSF							
Passenger Cars:		19	5	24	11	17	27	290
2-axle Trucks:		0	0	1	0	0	0	8
3-axle Trucks:		0	0	1	0	0	0	10
4+-axle Trucks:		1	1	2	1	1	1	26
Total Truck Trips (Actual Vehicles):		1	1	2	1	1	2	44
Total Trips (Actual Vehicles) <sup>2</sup>		20	6	26	12	18	29	334
<b>Passenger Cars:</b>		<b>20</b>	<b>5</b>	<b>25</b>	<b>12</b>	<b>18</b>	<b>29</b>	<b>324</b>
<b>Total Truck Trips (Actual Vehicles):</b>		<b>1</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>54</b>
<b>Total Project Trips (Actual Vehicles)<sup>2</sup></b>		<b>21</b>	<b>6</b>	<b>27</b>	<b>13</b>	<b>19</b>	<b>31</b>	<b>378</b>

<sup>1</sup> TSF = thousand square feet

<sup>2</sup> Total Trips = Passenger Cars + Truck Trips.