



DAVID EVANS
AND ASSOCIATES INC.

July 13, 2022

Job No. WCREWR35-0001

MEMORANDUM

To: Mr. Matt Frey
Vice President, Construction
Westcore Realty Adelanto 35, LLC
4350 La Jolla Village Drive, Suite 900,
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From: James Daisa, PE
Senior Transportation Project Manager



RE: ADDENDUM TO TRAFFIC IMPACT STUDY SCOPING AGREEMENT – PROPOSED WAREHOUSE DEVELOPMENT LOCATED AT ADELANTO ROAD AND RANCHO ROAD (EAST) – REVISED VMT ANALYSIS SCREENING

This memorandum is an addendum to the Traffic Impact Study Scoping Agreement submitted to the City of Adelanto on June 21, 2022. This addendum presents a revised VMT analysis screening assessment of the criterion for low VMT generating areas. The June 21st scoping agreement included a low-VMT area screening of the proposed warehouse using the SBCTA screening tool for a baseline year of 2024 and selecting the metric OD (origin-destination) VMT per service population. Based on these parameters the traffic analysis zone (TAZ) is not a low-VMT generating area (generating 55 to 165 NMT per service population and the scoping agreement stated a VMT analysis is required.

Determining the Appropriate Metric for VMT Screening Purposes

The selection of the metric OD VMT per service population was interpreted from the city's guidelines as for extracting VMT when conducting a VMT analysis (the city's guidelines do not provide guidance on the selection of a metric for various types of land uses for screening purposes) as shown below:

*Project-generated VMT shall be extracted from the travel demand forecasting model using the **origin-destination trip matrix** and shall multiply that matrix by the final assignment skims. The project-effect on VMT shall be estimated using a sub-regional boundary (such as a City limit or County line) and extracting the total link-level VMT for both the no project and with project condition.*

*In some cases, it may be appropriate to extract the Project-generated VMT using the **production-attraction** trip matrix. This may be appropriate when a project is entirely composed of retail or office uses, and there is a need to isolate the home-based-work (HBW) VMT for the purposes of isolating commute VMT. The city should evaluate the appropriate methodology based on the project land use types and context.*

A discussion with the project's environmental consultant (EPC Environmental) regarding consistency with the metric they review as part of the air quality and GHG emissions analyses (PA / service population) led us to research the correct application of the OD versus PA metric in screening projects.

A review of the staff report prepared for the June 24, 2020 Adelanto City Council meeting on Resolution 20-41 adopting guidelines for VMT thresholds of significance indicated that the city chose to allow use of both metrics (Page 179 of staff report – VMT Guidelines Decision Checklist) specifically with the use of PA VMT/service population when the project is a single use and the use of OD VMT/service population when the project is mixed-use.

The selection of the metric PA / service population is corroborated by the city’s guidelines shown above in that it is appropriate to use the PA data for projects comprised entirely of one land use and there is a need to isolate the home-based-work (HBW) VMT for the purposes of isolating commute VMT. EPC Environmental also stated that the baseline scenario should represent the point in time at which a project’s environmental review is initiated (year 2022 in the case of this project).

Revised Low-VMT Generating Area Screening Based on PA / Service Population Metric

The San Bernardino County Transportation Authority’s (SBCTA) VMT screening tool evaluates project sites potentially located within a “low VMT generating area”. These are areas in the which the existing land uses (or the projected land uses) generate low levels of VMT due to the characteristic of the land uses in the area or due to the area’s geographic location near other areas with a mix of land uses so people need not drive far for work, shopping, or school. The tool identifies the average VMT for the land uses in each of the SBCTA model’s traffic analysis zones (TAZ’s) by horizon year. The average VMT metric for a TAZ is compared against the County’s average VMT threshold of 32.7 VMT / service population as adopted by the City of Adelanto.

If the land uses in the TAZ in which the proposed project is located generates VMT less than the threshold, the project is in a low VMT generating area. The project may then be presumed to have a less-than-significant impact on VMT as long as the project’s land use is consistent with the existing and/or planned land use within the TAZ that was found to generate low levels of VMT. If the project land use is substantially different than the land use assumed in the SBCTA model, then the project cannot be presumed to have the same low VMT characteristics.

The project property is zoned Light Manufacturing (LM) and the proposed warehouse project is consistent with the other development within the TAZ under this zoning classification.

The visual output of the project area is shown in **Figure A**. The proposed warehouse is located within TAZ 53909402 which, based on the metric PA VMT / Service Population, is a low-VMT generating area producing, on average, 8.3 VMT per service population in the baseline year of 2022.

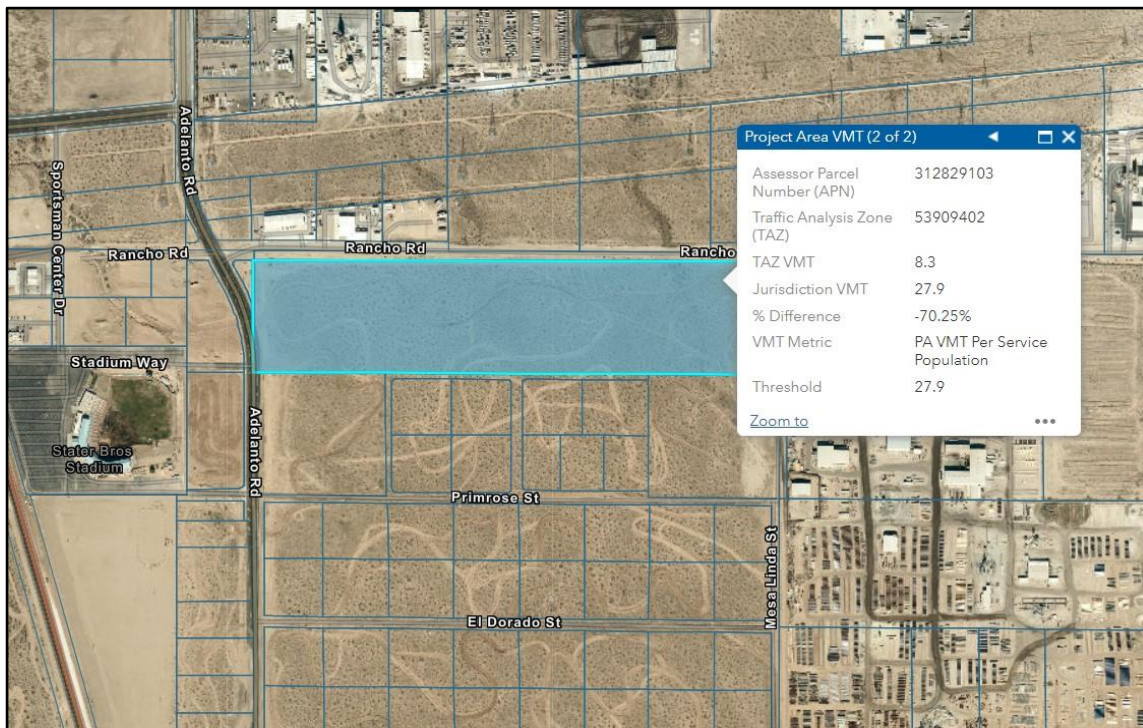


Figure A: SBCTA Low VMT Area screening tool output indicating that the project is located within a low VMT generating Traffic Analysis Zone (TAZ) based on the PA VMT / service population metric.

Results of VMT Screening Assessment

The project was assessed under the low VMT generating area criterion for a baseline year of 2022 which indicates that TAZ 53909402 has a PA VMT per service population of 8.3 VMT per service population which is well below the threshold of 32.7 VMT per service population, therefore the project is located in a low-VMT generating TAZ. **The project is screened from requiring a VMT analysis based on the low VMT generating area criterion.**