

# TECHNICAL MEMORANDUM



To: Mr. Daniel Adams  
Cornerstone Development Partners, Inc.

Date: May 7, 2022

From: Keil D. Maberry, P.E., Principal  
Linscott, Law and Greenspan, Engineers

LLG Ref: 2.21.4490.1

Subject: ***Vehicle Miles Traveled (VMT) Assessment for the Proposed Boyle Industrial Warehouse Project, Rialto***

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As requested, Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit this Vehicle Miles Traveled (VMT) Assessment Technical Memorandum for the proposed Boyle Industrial Warehouse project (herein after referred to as Project) in Rialto, California. This Technical Memorandum presents the VMT screening criteria and applies the criteria, accordingly. It should be noted that the approach and methodology outlined in this Technical Memorandum is based on the *SBCTA Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (February 2020)* and is generally consistent with the *Technical Advisory for Evaluating Transportation Impacts In CEQA*, published by the Governor's Office of Planning and Research (OPR), December 2018 (OPR Technical Advisory), which provides additional detail on the language and approach described in this Technical Memorandum.

On December 28, 2018, the California Natural Resources Agency adopted revised CEQA Guidelines. Among the changes to the guidelines was the removal of vehicle delay and LOS from consideration for transportation impacts under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled. Lead agencies are allowed to continue using their current impact criteria, or to opt into the revised transportation guidelines. However, the new guidelines must be used starting July 1, 2020, as required in CEQA section 15064.3. The City of San Bernardino recently adopted new traffic impact criteria in August 2020 to be consistent with the CEQA revisions. These new guidelines are contained within the City of San Bernardino Traffic Impact Analysis Guidelines, dated August 2020 and provide screening criteria and methodology for VMT analysis.

In late 2019, State courts stated that under section 21099, subdivision (b)(2), existing law is that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects.

As a result of SB 743, the new metric in the CEQA guidelines for transportation impacts is VMT per capita. The legislative intent of SB 743 is to balance the needs of

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congestion management with statewide goals for infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

## PROJECT DESCRIPTION

The proposed Project will consist of 40,491 square-foot (SF) industrial warehouse building and is expected to be completed in the Year 2023. The proposed Project is consistent with the existing land use and City of Rialto General Plan. The proposed project site is located on the northwest quadrant of Riverside Avenue and Resource Drive in the City of Rialto, California. *Figure 1*, attached, presents a Vicinity Map that illustrates the general location of the Project site and surrounding street system while *Figure 2* presents an existing site aerial. As shown in *Figure 2*, the Project site is currently vacant. *Figure 3* presents the proposed site plan for the Project, prepared by HPA Architecture. Access for the proposed Project will be provided via one (1) full-movement gated driveway along Resource Drive.

## PROJECT SCREENING CRITERIA

Under the VMT methodology, screening is used to determine if a project will be required to conduct a detailed VMT analysis. There are several types of screening that the lead agencies can apply to effectively screen projects from project-level assessment. As such, the following guidance summarizes the potential project screening, developed for the San Bernardino County Transportation Authority (SBCTA). Per the *SBCTA Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (February 2020)*, there are three types of screening to screen projects from project-level VMT assessments. The three screening steps are described below. The results of each screening step applied to the proposed Project is also discussed. It should be noted that the project only needs to satisfy one of the three screening steps.

### Step 1: Transit Priority Area (TPA) Screening

Projects located within a transit priority area (TPA) may be presumed to have a less than significant impact absent substantial evidence to the contrary. This presumption may **NOT** be appropriate if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75;
2. Includes more parking for use by residents, customers, or employees of the project than required by the City (if the City requires the project to supply parking);

3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
  4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.
- *Based on the SBCTA screening tool, the project site is not located within a Transit Priority Area (TPA). Therefore, Project Screening Step 1: TPA Screening is not satisfied..*

#### Step 2: Low VMT Area Screening

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. A low VMT area is defined as an individual traffic analysis zone (TAZ) where total daily Origin/Destination VMT per service population is lower than the City average total daily Origin/Destination VMT per service population.

- *Based on the SBCTA screening tool, the project site is located within Traffic Analysis Zone (TAZ) #53753201. Per the SBCTA screening tool, the Project TAZ VMT/service population is 43.1 VMT per service population and the City average VMT/service population is 27.9 VMT per service population. Comparison of the two VMT values indicates that the Project TAZ VMT is higher than the City VMT average. Therefore, Project Screening Step 2: Low VMT Area Screening is not satisfied.*

#### Step 3: Project Type Screening

Local serving retail projects (including restaurants) less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel. In addition to local serving retail, the following uses may, at the discretion of the City, be presumed to have a less than significant impact as their uses are often local serving in nature:

- Local-serving K-12 schools
- Local parks
- Day care centers
- Local-serving gas stations
- Local-serving banks

- Local-serving hotels (e.g. non-destination hotels)
- Student housing projects on or adjacent to college campuses
- Local-serving assembly uses (places of worship, community organizations)
- Community institutions (Public libraries, fire stations, local government)
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- Affordable or supportive housing
- Assisted living facilities
- Senior housing (as defined by HUD)
- Projects generating less than 110 daily vehicle trips. This generally corresponds to the following “typical” development potentials:
  - 11 single family housing units
  - 16 multi-family, condominiums, or townhouse housing units
  - 10,000 sq. ft. of office
  - 15,000 sq. ft. of light industrial
  - **63,000 sq. ft. of warehousing**
  - 79,000 sq. ft. of high cube transload and short-term storage warehouse

➤ *As stated previously, the proposed Project will consist of a 40,491 SF industrial warehouse building, which is less than the 63,000 sq. ft. warehouse. Therefore, Project Screening Step 3: Project Type Screening is satisfied.*

## CONCLUSION

Consistent with the *SBCTA Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (February 2020)* and *OPR Technical Advisory* the proposed Boyle Industrial Warehouse Project will result in a less-than-significant transportation impact based on the SBCTA VMT Guidelines Type 3: Project Type Screening.

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We appreciate the opportunity to provide this Technical Memorandum. Should you have any questions regarding the memorandum, please contact us at (949) 825-6175.

Cc: File

