



October 16, 2021

Mr. Ross Yamaguchi, Senior Project Manager
 Highpointe Communities
 530 Technology, Suite 100
 Irvine, California 92618

Subject: Redlands Residential – VMT Screening

Dear Mr. Yamaguchi,

Translutions, Inc. (Translutions) is pleased to provide this letter discussing the trip generation and Vehicle Miles Traveled (VMT) for the proposed residential project to be located on the east side of San Timoteo Canyon Road and Nevada Street in the City of Redlands. The VMT analysis is a requirement under CEQA due to the passage of Senate Bill 743 (SB-743), while the trip generation is a requirement to identify if a local transportation analysis is required.

PROJECT TRIP GENERATION

The trip generation for the project was therefore based on trip generation rates included in the Institute of Traffic Engineers' (ITE) *Trip Generation Manual* (11th Edition) for Land Use 210: Single-Family Detached Housing. Table A shows the trip generation for the project.

Table A - Project Trip Generation

Land Use	Units	A.M. Peak Hour			P.M. Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Phase I								
Single-Family Residential								
Trip Generation Rates ¹		0.18	0.52	0.70	0.59	0.35	0.94	9.43
Trip Generation	27 DU	5	14	19	16	9	25	255

Notes: DU = Dwelling Unit

¹ Trip generation based on rates for Land Use 210 - "Single-Family Detached Housing" from Institute of Transportation Engineers' (ITE) *Trip Generation* (11th Edition).

As seen on Table A, the proposed project is forecast to generate 19 trips during the a.m. peak hour, 25 trips during the p.m. peak hour, and 255 daily trips. **The City requires a local traffic study if a project generates more than 50 peak hour trips. Since the project generates less than 50 peak hour trips, a local traffic study should not be required.**

VMT SCREENING ANALYSIS

As stated earlier, VMT analysis is a requirement under CEQA due to the passage of Senate Bill 743 (SB-743). SB-743 was codified in Public Resources Code section 21099, was signed by the Governor in 2013 and directed the Governor's Office of Planning and Research (OPR) to identify alternative metrics for evaluating transportation impacts under CEQA. Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Recently adopted changes to the CEQA Guidelines in response to Section 21099 include a new section (15064.3) that specifies that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts. A separate Technical Advisory issued by OPR provides additional technical details on calculating VMT and assessing transportation impacts for various types of projects. The City adopted thresholds of significance and screening thresholds under VMT in July 2020. The City's guidelines include several screening thresholds:

1. **Project Location Within a Transit Priority Area.** Projects screened based on being located within a Transit Priority Area (TPA) are those located within a one-half (0.5) mile from a major transit stop, and therefore is presumed to have a less than significant impact on traffic. Therefore, these projects can be determined to be exempt from having to prepare a project-level VMT analysis, unless one of the following conditions exist.
 - a. The project has a Floor Area Ratio (F.A.R.) less than 0.75;
 - b. The project includes more parking for use by residents, customers, or employees of the project than required by jurisdiction;
 - c. The project is inconsistent with the County's Sustainable Community Strategy Plan; or,
 - d. The project replaces affordable residential units with smaller number of moderate-or high-income residential units.

The project does not meet these requirements.

2. **Project Location Within a Low VMT Area.** The regional VMT study lead by SBCTA produced a user-friendly, web-based tool for determining exemption under the Low VMT Area criterion. Using the San Bernardino Transportation Analysis Model (SBTAM), travel forecasting model was used to measure VMT performances for individual jurisdictions, including the City of Redlands. The travel forecasting was mapped to assist each jurisdiction in determining if a proposed project is located within an area that may have already been identified to have a low amount of VMT, and therefore could be considered for screening.
3. **By Type of Project or Land Use.** Local-serving retail generally improves the convenience of shopping closer to homes and residential areas, and therefore has the effect of reducing overall VMT. Therefore, local serving serving retail projects with stores that have less than 50,000 square-feet of floor area may be presumed to have a less than significant impact on VMT.

Additionally, the several other local-serving establishments such as K-12 schools, parks, day care centers, etc. are presumed to have less than significant impact on VMT, and therefore, can be determined to be exempt from performing a project-level VMT analysis under CEQA.

Furthermore, projects that generate less than 3,000 Metric Tons (MT) of "Carbon Dioxide Equivalent (CO2e)" per year can be presumed to have less than significant impact on VMT. Since the intent and goals of SB 743 are to meet the State's GHG reduction goals, the project team reached this conclusion by studying the CEQA GHG threshold of significance recommended by the South Coast Air Quality Management District (SCAQMD), which is 3,000 MT of CO2e per year. The recommendation by SCAQMD is the most stringent in the region. Projects which generate less than 3,000 MT of CO2e per year include the following and would be exempt from project-level VMT analysis.

- Single-Family Residential – 167 dwelling units or fewer;
- Multi-Family Residential (1-2 stories) – 232 dwelling units or fewer;
- Multi-Family Residential (3+ stories) – 299 dwelling units or fewer;
- Office – 59,100 square-feet or less;
- Local Serving Retail Center – 112,400 square-feet or less (no stores larger than 50,000 square-feet in a commercial center);
- Warehousing – 463,600 square-feet or less; and,
- Light Industrial – 74,600 square-feet or less.

The proposed project includes 27 single family homes, and therefore, meets this this screening threshold which exempts and presumes less than significant impacts for projects with up to 167 single family homes.

CONCLUSION

Based on the VMT thresholds set by the City of Redlands, the project is presumed to have a less than significant impact on VMT. In addition, since the project generates less than 50 peak hour trips, a local traffic analysis should not be required.

We hope you will find this information helpful. Should you have any questions, please don't hesitate to call me at (949) 656-3131 or by email at sandipan@translutions.com.

Sincerely,

translutions, Inc.

Sandipan Bhattacharjee, P.E., T.E., AICP, ENV SP
Principal

