October 3, 2023

Mr. Bob Prasse, Director of Environmental Services
MIG, INC.
1650 Spruce Street, Suite 106
Riverside, California 92507

RE: Citrus Avenue Warehouse Project Level of Service & Vehicle Miles Traveled Screening Analysis
Project No.: 19530

Dear Mr. Prasse:

Ganddini Group, Inc. is pleased to provide this Level of Service & Vehicle Miles Traveled Screening Analysis for the proposed Citrus Avenue Warehouse Project. We trust the findings of this analysis will aid you and the City of Fontana in assessing the project.

PROJECT DESCRIPTION

The net 15.84-acre project site is located north of Slover Avenue, south of Boyle Avenue, east of Citrus Avenue, and west of Oleander Avenue (APNs: 0251-151-03, -04, 07, -09, -10, -14, -15, -16, -19, -21, -22, -39, -40, -42, -43, and -44) in the City of Fontana, California. The project site is currently occupied by 15 single-family detached residential dwelling units; however, a few of the residential lots appear to be currently used for commercial uses. Figure 1 shows the project location map.

The proposed project involves construction of a 355,995 square foot high-cube transload and short-term storage warehouse within the Light Industrial (M-1) and Community Commercial (C-1) Zoning Districts. Vehicular access is proposed at Slover Avenue via three project driveways and at Boyle Avenue via two project driveways. Figure 2 illustrates the project site plan.

PROJECT TRIP GENERATION

Table 1 shows the existing land uses trip generation for residential land uses and Table 2 shows the project trip generation for the proposed warehousing use based upon trip generation rates obtained from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition, 2021). Based on review of the ITE land use descriptions, trip generation rates for Single-Family Detached Residential (ITE Land Use Code 210) and High-Cube Transload and Short-Term Storage Warehouse (ITE Land Use Code 154) were determined to adequately represent the existing/proposed uses and were selected for this analysis. The existing and project trip generation forecasts were determined by multiplying the trip generation rates by the land use quantities.

A few of the existing residential land uses currently appear to operate commercial businesses (automobile repair, storage yard, nursery). All residential lots were analyzed as single-family detached residential to provide for a conservative assessment of the net project trip generation and to correspond with the intended and constructed land uses.

As shown in Table 1, the proposed project is forecast to generate approximately 498 daily vehicle trips, including 29 vehicle trips during the AM peak hour and 34 vehicle trips during the PM peak hour.

Truck Trips

In accordance with industry practice and City requirements for truck-oriented uses, the project trip generation was also calculated in terms of Passenger Car Equivalent (PCE) trips. The percentage of truck trips was obtained from the ITE *Trip Generation Manual* (11th Edition, 2021). The breakdown of truck mix by axle type was obtained from the City of Fontana *Truck Trip Generation Study* (August 2003). Finally, truck trips were converted to PCE trips based on the following factors recommended by the City of Fontana *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (October 2020): 2.0 for 2-axle trucks, 2.5 for 3-axle trucks, and 3.0 for trucks with four or more axles.

As also shown in Table 1, the proposed project is forecast to generate approximately 633 daily PCE trips, including 43 PCE trips during the AM peak hour and 38 PCE trips during the PM peak hour.

CRITERIA FOR THE PREPARATION OF TRAFFIC IMPACT ANALYSES

According to the City of Fontana *Transportation Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment* (October 2020) "[the City TIA Guidelines"], certain types of projects, because of their size, nature, or location, are exempt from the requirement of preparing a traffic impact analysis.

Level of Service (LOS) Analysis

The City of Fontana has established guidelines for Level of Service (LOS) impact for General Plan operational compliance. As specified in the City TIA Guidelines, a traffic impact analysis must be prepared when a proposed change in land use, development project, or at local discretion, a group of projects are forecast to equal or exceed the Congestion Management Program (CMP) threshold of 250 two-way peak hour trips generated, based on trip generation rates published for the applicable use or uses in the Institute of Transportation Engineers' Trip Generation Manual or other approved data source. Pass-by trips shall not be considered in the threshold determination. Additionally, industrial, warehousing, and truck-oriented projects must convert vehicle trip forecasts to passenger car equivalent (PCE) trips before applying the above threshold.

As specified in the City TIA Guidelines, the need for a level of analysis required is determined as follows:

- If a project is forecast to generate between 100 and 249 two-way peak hour trips, a traffic impact analysis will be required, but the extent of the analysis will be lesser.
- If a project generated between 50 and 100 two-way peak hour trips, a focused traffic analysis will be required.
- If a project generates less than 50 peak hour trips, a traffic analysis shall not be required, and a trip generation memo will be considered sufficient unless the City has specific concerns related to project access and interaction with adjacent intersections.

Presuming project access will be designed in accordance with applicable engineering standards, the proposed project is forecast to generate fewer than 50 peak hour PCE trips and therefore satisfies the City-established exemption criteria for preparation of a traffic analysis with Level of Service analysis.

Vehicle Miles Traveled (VMT) Analysis

The project VMT impact has also been assessed in accordance with the City TIA Guidelines. The City TIA Guidelines establish screening thresholds for certain types of projects that may be presumed to cause a less than significant VMT impact based on substantial evidence provided in the Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018).

The City TIA Guidelines specify the following four screening steps: 1) Transit Priority Area (TPA) Screening; 2) Low VMT Area Screening; 3) Low Project Type Screening; and 4) Project net daily trips less than 500 ADT.

Transit Priority Area (TPA) Screening

Projects located within a TPA (half mile area around an existing major transit stop or an existing stop along a high-quality transit corridor) 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 jurisdiction (if the jurisdiction requires the project to supply parking)
3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City with input from the Metropolitan Planning Organization): or
4. Replaces affordable residential units with a smaller number of moderate or high-income residential units.

The San Bernardino Council Transportation Authority (SBCTA) VMT Screening Tool was used to determine if the project is located within a TPA. The project site is not located within a TPA based on the SBCTA VMT Screening Tool assessment. Therefore, the proposed project does not satisfy the City-established screening criteria for projects located within a TPA.

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.

For this screening in the SBCTA VMT Screening Tool, the San Bernardino Transportation Analysis Model (SBTAM) travel forecasting model was used to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs). TAZs are geographic polygons similar to census block groups used to represent areas of homogenous travel behavior. Total daily VMT per service population (population plus employment) was estimated for each TAZ. This presumption may not be appropriate if the project land uses would alter the existing built environment in such a way as to increase the rate or length of vehicle trips.

The proposed project is consistent with existing industrial land uses in the TAZ and there does not appear to be anything unique about the project that would otherwise be misrepresented utilizing the data from the SBCTA VMT Screening Tool. In accordance with the City TIA Guidelines, a low VMT area for industrial projects is defined as a TAZ where VMT per service population does not exceed 15 percent below the current County

of San Bernardino baseline VMT per service population. Exhibit A shows the SBCTA VMT Screening Tool results for the project site.

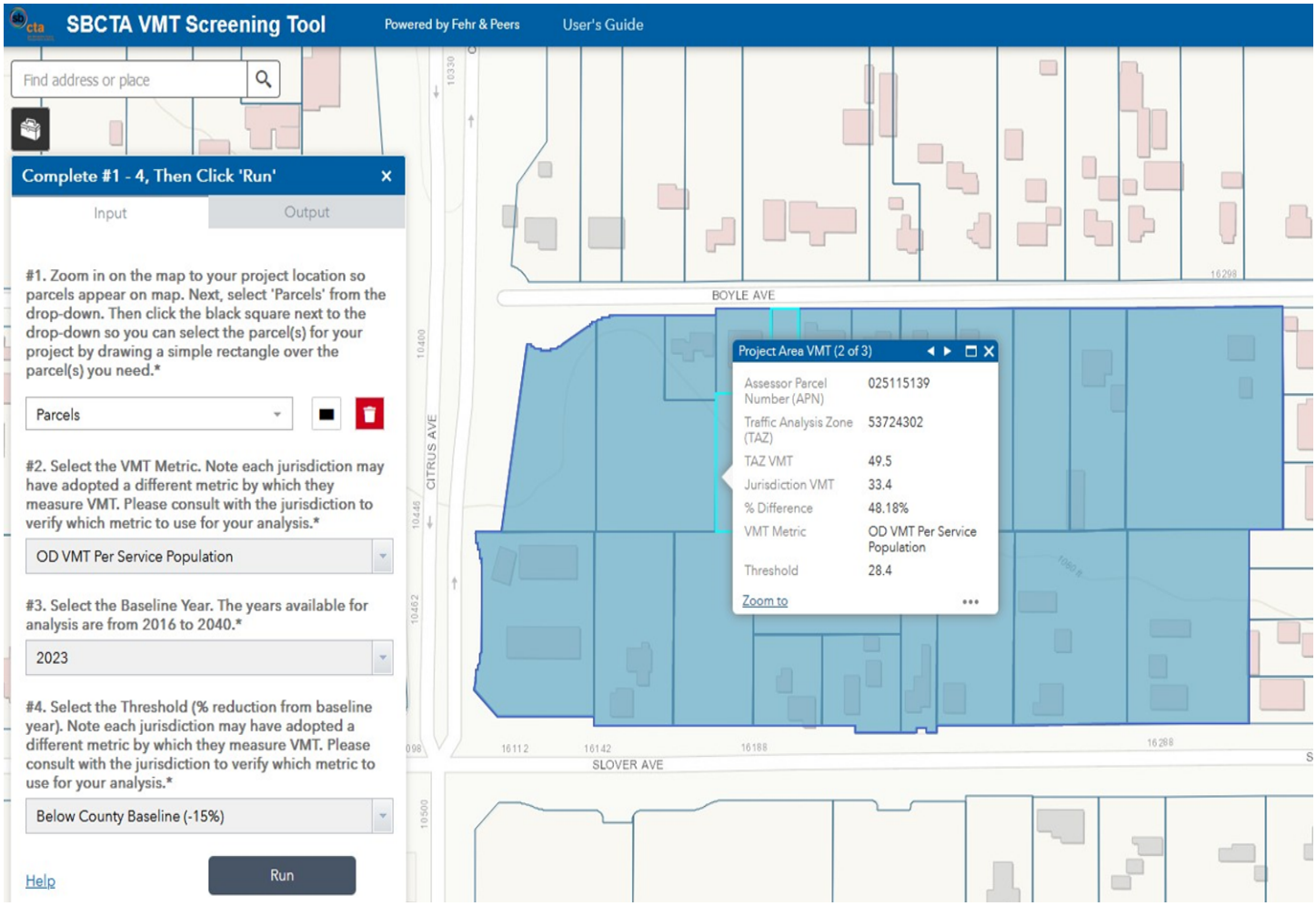

Exhibit A – SBCTA VMT Screening Tool Results for the Project

Based on the SBCTA VMT Screening Tool assessment, the proposed project is located within TAZ 53724302. The project TAZ 2023 OD VMT per service population is equal to 49.5. The County baseline is 33.4 VMT per service population and the threshold (15% below County baseline) is equal to 28.4 VMT per service population. Therefore, the proposed project does not satisfy the City-established screening criteria for projects located in low VMT areas.

Project Type Screening

Some project types have been identified as having the presumption of a less than significant impact as they are local serving by nature, or they are small enough to not warrant assessment. Local serving retail projects 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. Local serving retail include the following:

- Supermarket
- Restaurant/café/bar
- Coffee/donut shop
- Dry cleaners
- Barbershop
- Hair/nails salon
- Walk-in medical clinic
- Urgent care
- Auto repair/tire shop
- Gyms/health club
- Dance/yoga/fitness/material arts studio

In addition to local serving retail, the following uses can also be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are 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)

The project site is not local-serving retail and is also not a land use listed as being presumed to have a less than significant impact. Therefore, the proposed project does not satisfy the City-established screening criteria for project type screening.

Project Net Daily Trips Less Than 500 ADT Screening

Projects that generate fewer than 500 average daily trips (ADT) would 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. Projects which generate less than 500 ADT include the following:

- Single family residential – 52 Dwelling Units or fewer
- Multi-family residential – 68 Dwelling Units or fewer
- General Office – 51,000 square feet of less
- Light Industrial – 100,000 square feet or less
- Warehousing – 287,000 square feet or less
- High-Cube Fulfillment Center Warehouse – 357,000 square feet or less

The proposed project is forecast to result in 498 net daily vehicle trips; therefore, the proposed project satisfies the City-established screening criteria for projects generating less than 500 net daily and may be presumed to result in a less than significant VMT impact.

CONCLUSION

Presuming project access will be designed in accordance with applicable engineering standards, the proposed project is forecast to generate fewer than 50 peak hour PCE trips and therefore satisfies the City-established exemption criteria so that a traffic analysis including a Level of Service analysis is not required.

The proposed project satisfies the City-established screening criteria for projects generating less than 500 net daily and may be presumed to result in a less than significant VMT impact.

We appreciate the opportunity to assist you on this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 795-3100 x 103.

Sincerely,

GANDDINI GROUP, INC.
Bryan Crawford | Senior Associate
Giancarlo Ganddini, PE, PTP | Principal

Table 1
Project Trip Generation

Land Use: High-Cube Transload & Short-Term Storage Warehouse
Size: 355.995 TSF

TRIP GENERATION RATES PER TSF[1]								
		AM Peak Hour			PM Peak Hour			Daily
Vehicle Type	Source[2]	In	Out	Rate	In	Out	Rate	Rate
All Vehicles	ITE 154	77%	23%	0.080	28%	72%	0.100	1.400
Trucks Only	ITE 154	49%	51%	0.020	47%	53%	0.010	0.220
Passenger Car (75.0% AM, 90.0% PM, 84.3% Daily)		0.046	0.014	0.060	0.025	0.065	0.090	1.180
Truck (25.0% AM, 10.0% PM, 15.7% Daily)		0.010	0.010	0.020	0.005	0.005	0.010	0.220
Truck Mix:	SCAQMD							
2-Axle Trucks (16.7%)		0.002	0.002	0.004	0.001	0.001	0.002	0.037
3-Axle Trucks (20.7%)		0.002	0.002	0.004	0.001	0.001	0.002	0.046
4+ Axle Trucks (62.6%)		0.006	0.006	0.012	0.003	0.003	0.006	0.138

VEHICLE TRIPS GENERATED							
	AM Peak Hour			PM Peak Hour			
Vehicle Type	In	Out	Total	In	Out	Total	Daily
Passenger Car	16	5	21	9	23	32	420
Trucks							
2-Axle Trucks	1	1	2	0	0	0	13
3-Axle Trucks	1	1	2	0	0	0	16
4+ Axle Trucks	2	2	4	1	1	2	49
Subtotal	4	4	8	1	1	2	78
Total Vehicle Trips Generated	**20**	**9**	**29**	**10**	**24**	**34**	**498**

PCE[3] TRIPS GENERATED								
		AM Peak Hour			PM Peak Hour			
Vehicle Type	PCE Factor[4]	In	Out	Total	In	Out	Total	Daily
Passenger Car	1.0	16	5	21	9	23	32	420
Trucks								
2-Axle Trucks	2.0	2	2	4	0	0	0	26
3-Axle Trucks	2.5	3	3	6	0	0	0	40
4+ Axle Trucks	3.0	6	6	12	3	3	6	147
Subtotal		11	11	22	3	3	6	213
Total PCE Trips Generated		**27**	**16**	**43**	**12**	**26**	**38**	**633**

Notes:
(1) TSF = Thousand Square Feet

(2) ITE = Institute of Transportation Engineers *Trip Generation Manual* (11th Edition, 2021); ### = ITE Land Use Code.
SCAQMD = South Coast Air Quality Management District recommendations for non-cold storage high-cube warehouse.

(3) PCE = Passenger Car Equivalent

(4) Source: City of Fontana *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (October 2020).

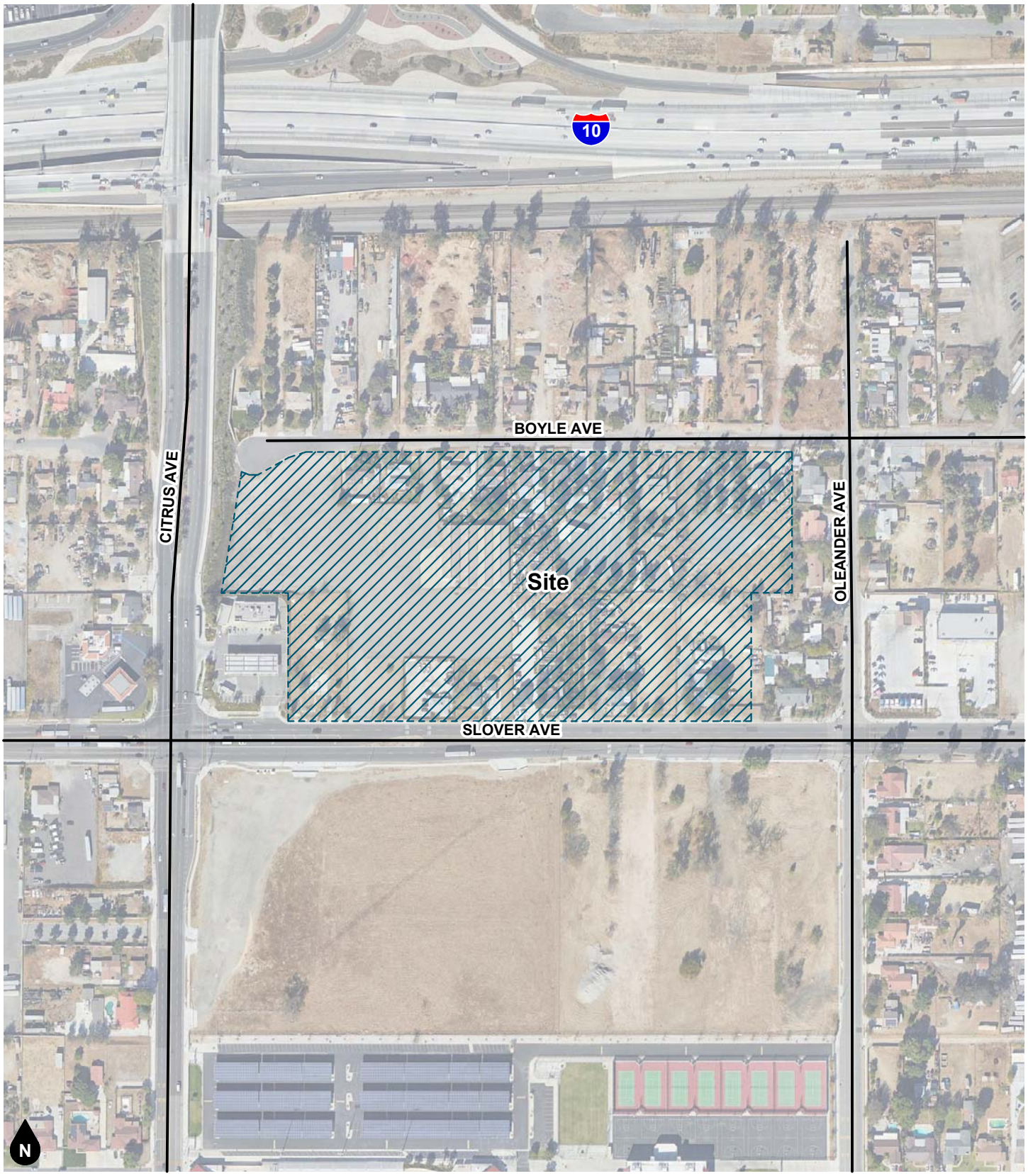

Figure 1
Project Location Map

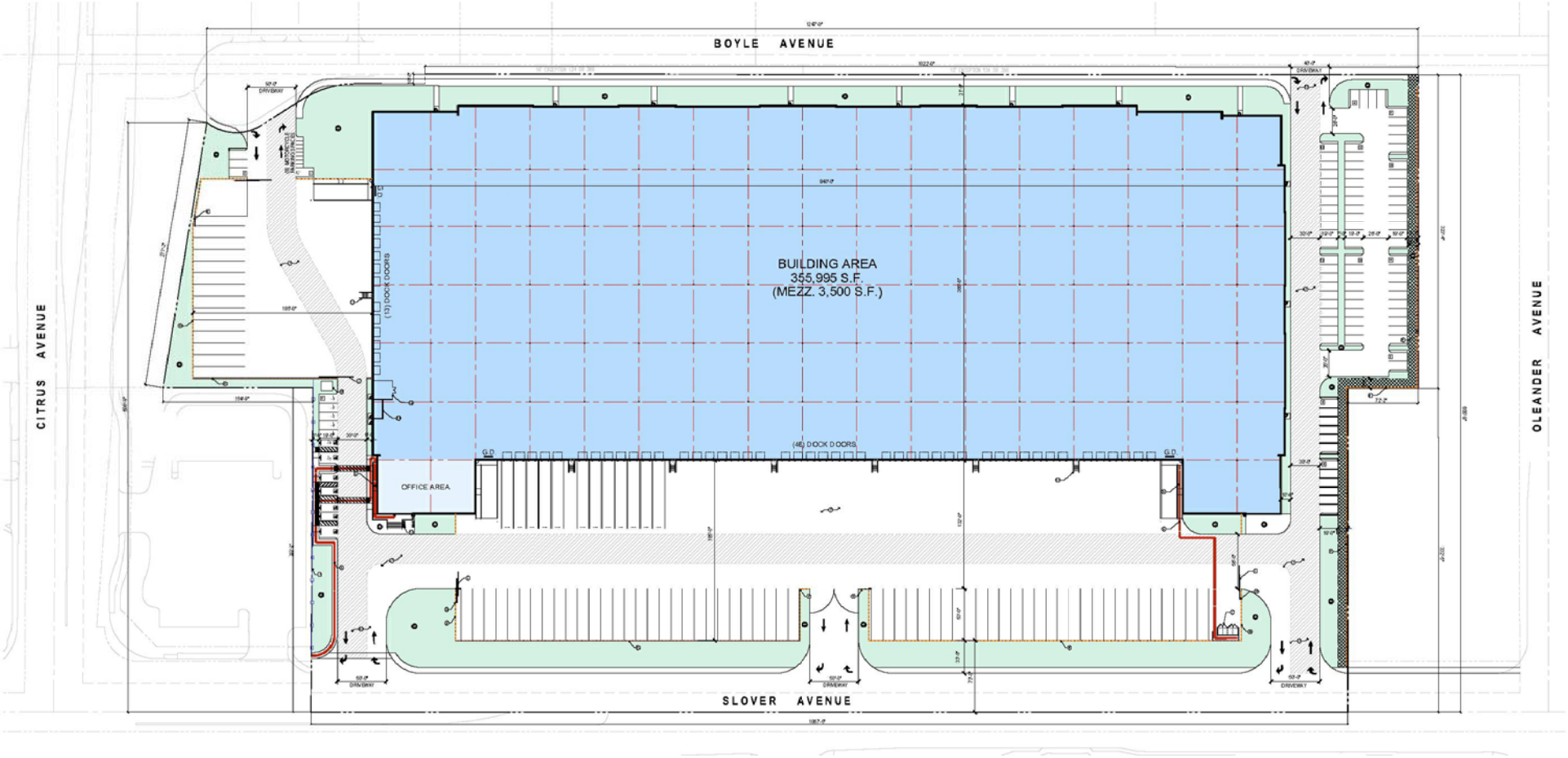

Figure 2
Site Plan