

ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

Date: February 8, 2024
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To: City of Covina Transportation Division
Site: 529 Cutter Way Self Storage, City of Covina
Subject: Vehicle Miles Traveled (VMT) Screening Analysis

This technical memorandum evaluates the trip generation and need to prepare a vehicle-miles traveled (VMT) analysis for the proposed Cutter Way Industrial Project located at 529 Cutter Way in the City of Covina. The development proposes to replace an existing 2,647 square foot church to construct a 4-story self-storage facility, with a rental office totaling 183,458 square foot and 1,370 units (“Project”). The Project site is designed with a looped driveway with both the exit and entrance on Cutter Way, accessibility to the Project would be via the proposed driveways on the eastern boundary of the Project site and would provide ingress and egress for automobiles. The Project will have 12 passenger vehicle stalls for employees and visitors and would also include 2 ADA spaces. The Project site plan is shown in Figure 1.

Project Trip Generation and TIA Screening

The Project trip generation was prepared using trip rates from the Institute of Transportation Engineers (ITE)¹ for Mini-Warehouse (Land Use Code 151). The Mini-Warehouse ITE rate includes two different variables, per thousand square feet (TSF) and per hundred storage units (HSU). Table 1 presents the worst-case scenario trip generation estimate for the proposed Project. As shown in Table 1, the Project is forecast to generate 266 daily trips including 17 trips during the AM peak hour and 28 trips during the PM peak hour.

VMT Screening Analysis

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor’s Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating Transportation impacts. SB743 specified that the new criteria should promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. The bill also specified that delay-based level of service could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3 - Determining the Significance of Transportation Impacts states that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

The City of Covina adopted VMT guidelines referenced in the *Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (VMT Guidelines October 2020). The VMT Guidelines identify screening thresholds to determine if Projects would require a full VMT analysis. If a Project meets one of the following criteria, then the VMT impact of the Project is considered less-than significant and no further analysis of VMT would be required:

1. The Project is located within a Transit Priority Area (TPA).
2. The Project is located in a low VMT generating area.
3. The Project is locally serving or generates less than 110 daily vehicle trips.

¹ *Trip Generation*, 11th Edition, Institute of Transportation Engineers (ITE). 2021.

The applicability of each criterion to the proposed Project is discussed below.

Screening Criteria 1 - Transit Priority Area Screening: As shown in Figure 2, The Project is not located in a TPA, therefore the Project would not meet Screening Criteria 1.

Screening Criteria 2 - Low VMT Area Screening: According to the City's guidelines, residential and office projects may be presumed to have a less than significant impact absent substantial evidence to the contrary. The SGVCOG (San Gabriel Valley Council of Governments) VMT Evaluation Tool was used to determine if the proposed Project lies in a low VMT area. Since the Project land use is consistent with the predominate land use in the TAZ the project is located in 22327200, the appropriate metric to analyze VMT for this analysis is VMT per Service Population. The VMT per Service Population for TAZ 22327200 is 32.8, less than the City average of 39.28. Therefore, the Project would meet Screening Criteria 2. The SGVCOG screening output can be found in *Appendix A*.

Screening Criteria 3 – Local Serving Land Use or Trip Generation Screening: According to the City's guidelines, projects that serve the local community or generate less than 110 daily vehicle trips and have the potential to reduce VMT would not be required to complete a VMT assessment. These types of projects include K-12 schools, local serving retail, day care centers, student housing and other community institutions. The Project proposes 1,370 self-storage units, which is not considered a locally serving use, and is expected to generate over 110 daily trips. Therefore, the Project would not meet Screening Criteria 3.

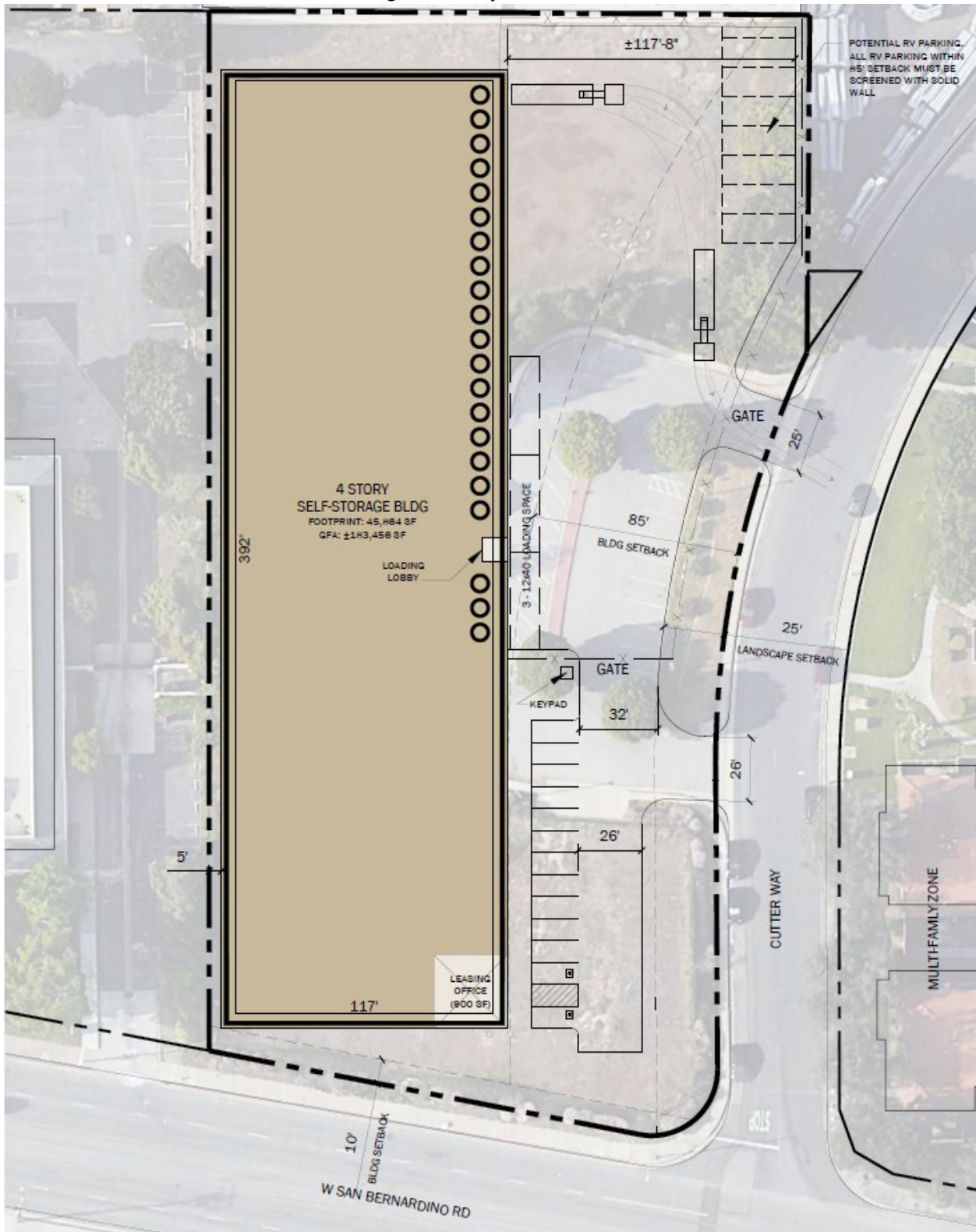
Summary

As shown in Table 1, the Project is forecast to generate 266 daily trips including 17 trips during the AM peak hour and 28 trips during the PM peak hour.

Using the City's VMT Guidelines, while the Project would not satisfy Screening Criteria 1 and 3; however, the Project would satisfy Criteria 2. Therefore, the proposed Project would screen out of further VMT analysis and have a less than significant VMT impact.

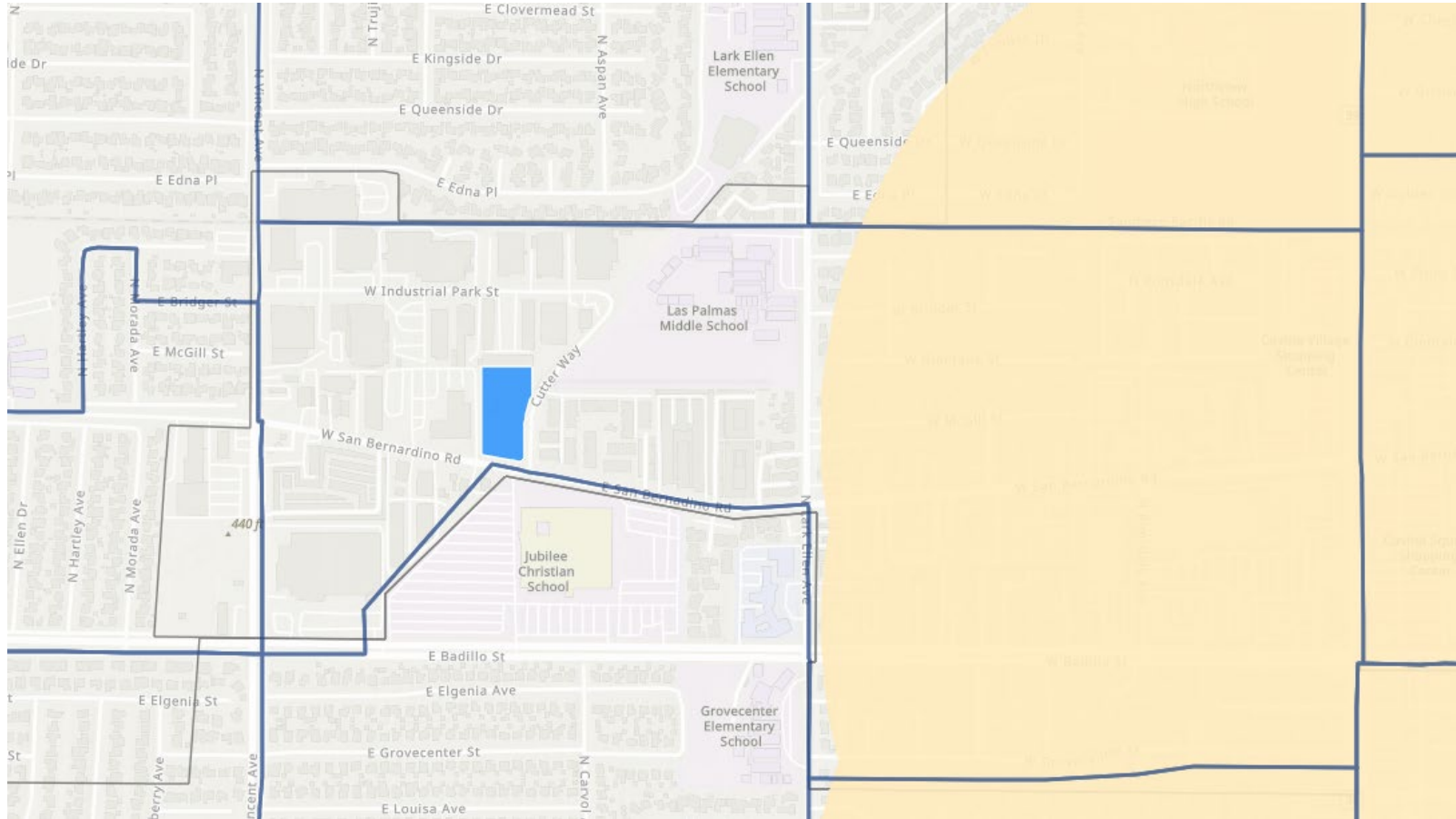
If there are any questions about this information, please contact (949) 794-1180 or techservices@epdsolutions.com.

Figure 1: Project Site Plan



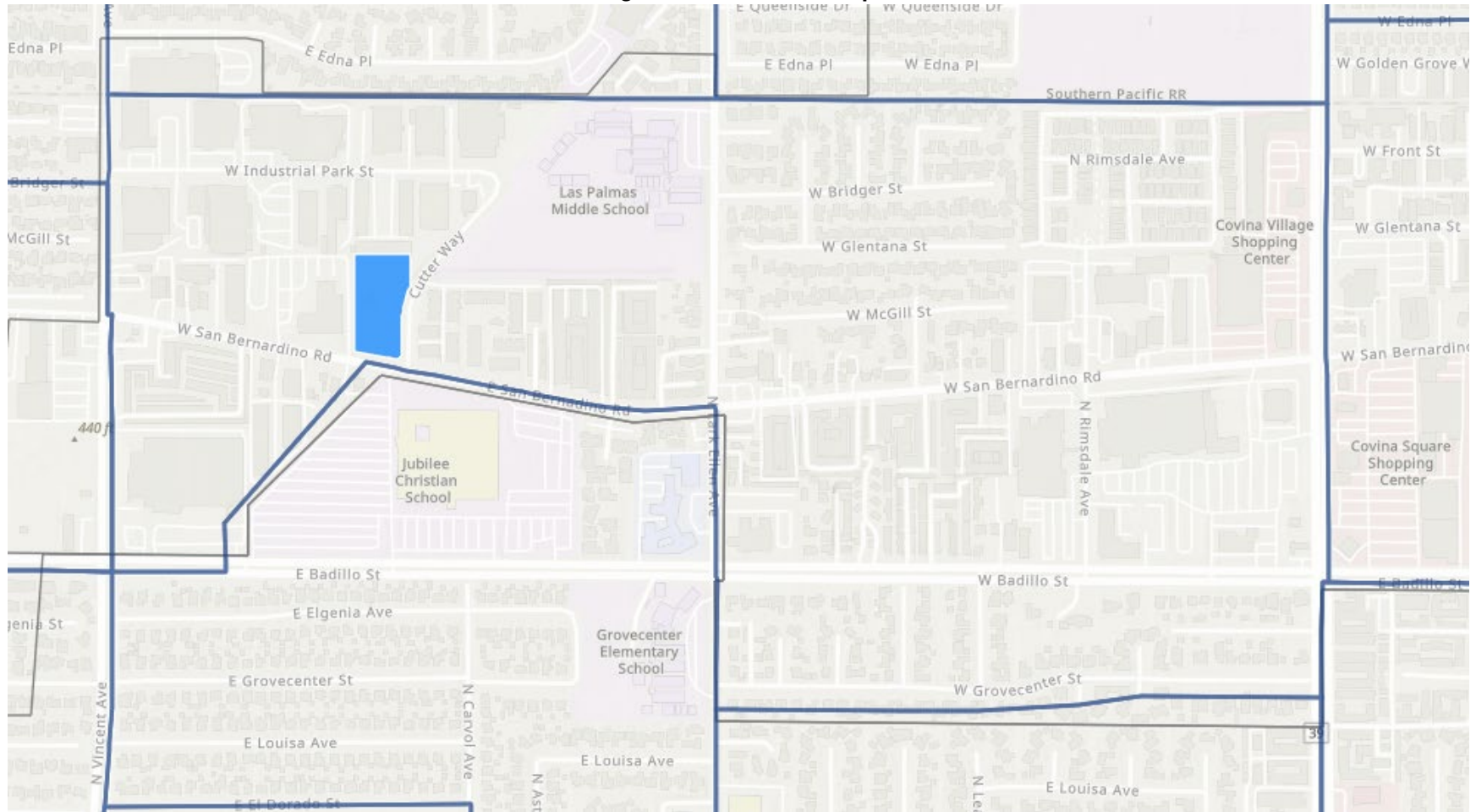
Source: Ware Malcomb

Figure 2: Covina TPA Map



Source: SGVCOG VMT

Figure 3: Covina TAZ Map



Source: SGVCOG VMT

Table 1: Project Trip Generation

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Rates								
151 Mini-Warehouse ¹	HSU	17.96	0.62	0.59	1.21	0.84	0.84	1.68
151 Mini-Warehouse ²	TSF	1.45	0.05	0.04	0.09	0.07	0.08	0.15
Proposed Project Trip Generation								
151 Mini-Warehouse ¹								
	13.70 HSU	246	8	9	17	12	11	23
	183.458 TSF	266	10	7	17	13	15	28
Worst Case Scenario Trip Generation		266	10	9	17	13	15	28

¹ Trip rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 151 - Mini-Warehouse

² Trip rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 151 - Mini-Warehouse

HSU = Hundred Storage Unit

TSF = Thousand Square Feet

APPENDIX A

Project Details

Timestamp of Analysis: January 05, 2024, 05:22:55 PM

Project Name: Cutter Way Self-Storage

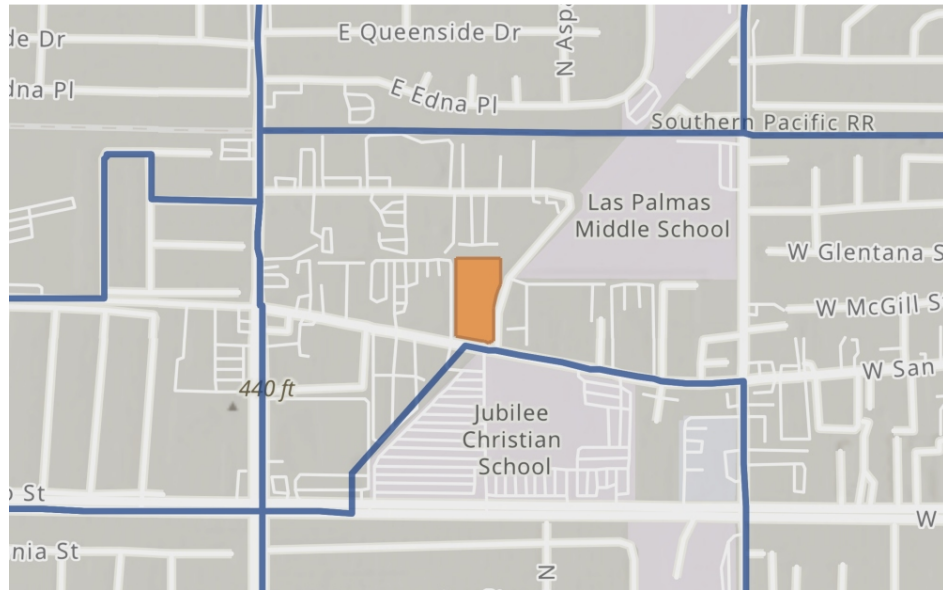
Project Description: Self storage project

Project Location

jurisdiction:	apn	TAZ
Covina	8434-013-010	22327200

Inside a TPA?

No (Fail)



Analysis Details

Data Version: SCAG Regional Travel Demand Model
2016 RTP Base Year 2012

Analysis Methodology: TAZ

Baseline Year: 2024

Project Land Use

Residential:

Single Family DU:

Multifamily DU:

Total DUs: 0

Non-Residential:

Office KSF:

Local Serving Retail KSF:

Industrial KSF:

Residential Affordability (percent of all units):

Extremely Low Income: 0 %

Very Low Income: 0 %

Low Income: 0 %

Parking:

Motor Vehicle Parking:

Bicycle Parking:

Industrial Vehicle Miles Traveled (VMT) Screening Results

Land Use Type 1:	Industrial
VMT Without Project 1:	Total VMT per Service Population
VMT Baseline Description 1:	Subarea
VMT Baseline Value 1:	39.28
VMT Threshold Description 1:	-15%
Land Use 1 has been Pre-Screened by the Local Jurisdiction:	N/A

	Without Project	With Project & Tier 1-3 VMT Reductions	With Project & All VMT Reductions
Project Generated Vehicle Miles Traveled (VMT) Rate	32.8	32.8	32.8
Low VMT Screening Analysis	Yes (Pass)	Yes (Pass)	Yes (Pass)

