



March 31, 2021

Ms. Cheryl Tubbs  
LILBURN CORPORATION  
1905 Business Center Drive  
San Bernardino, CA 92408

**RE: Old Dominion Fontana Vehicle Miles Traveled Screening Analysis**  
Project No.: 19-0192

Dear Ms. Tubbs:

## **INTRODUCTION**

Ganddini Group, Inc. is pleased to provide this Vehicle Miles Traveled Screening Analysis for the proposed Old Dominion Fontana Project. We trust the findings of this analysis will aid you and the County of San Bernardino in assessing the project. This analysis supplements the Old Dominion Fontana Project Trip Generation Memorandum prepared by Ganddini Group, Inc. (October 29, 2019).

## **PROJECT DESCRIPTION**

The 8.5-acre project site is located at the northwest corner of Lime Avenue and Arrow Route in unincorporated County of San Bernardino (address 15550 Arrow Route). The project site is currently developed with an approximately 4,000 square foot structure for a transportation/logistics company. The proposed project involves redeveloping the project site with an approximately 32,150 square foot building for a freight forwarding and dispatch uses.

## **TRIP GENERATION**

As shown in the Old Dominion Fontana Project Trip Generation Memorandum prepared by Ganddini Group, Inc. (October 29, 2019), the proposed project is forecast to generate approximately 507 daily vehicle trips, including 22 vehicle trips during the AM peak hour and 25 vehicle trips during the PM peak hour. The proposed project is forecast to generate approximately 889 daily PCE trips, including 42 PCE trips during the AM peak hour and 47 PCE trips during the PM peak hour.

## **VEHICLE MILES TRAVELED (VMT) ANALYSIS**

The project VMT impact has been assessed in accordance with guidance from the County of San Bernardino Transportation Impact Study Guidelines (July 2019) [“the County guidelines”].

The County guidelines provide 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 County of San Bernardino TIA Guidelines provide the following three screening steps: 1) Project Type Screening; 2) Transit Priority Area (TPA) Screening; and 3) Low VMT Area Screening.

### **Project Type Screening**

Projects which serve the local community and have the potential to reduce VMT should not be required to complete a VMT assessment. These projects are noted below:

- K-12 schools
- Local-serving retail uses less than 50,000 square feet
- Local parks
- Day care centers
- Local serving gas stations
- Local serving banks
- Student housing projects
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- 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 square feet of office
  - 15,000 square feet of light industrial
  - 63,000 square feet of warehousing
  - 79,000 square feet of high-cube transload and short-term storage warehouse
  - 12 hotel rooms

Although the proposed project is below the square footage threshold for warehousing and high-cube transload/short-term storage warehouse, the project does not satisfy the project type screening since it is forecast to generate more than 110 daily trips.

### **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) as determined by the most recent SCAG RTP/SCS should not be required to complete a VMT assessment as they are presumed to result in a less than significant VMT impact.

The San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool was used to determine if the project is located within a TPA. Based on the SBCTA VMT Screening Tool assessment, the proposed project is partially located within a TPA. More than 25 percent of the project parcel is located outside the TPA area; therefore, the overall project does not satisfy the TPA screening criteria.<sup>1</sup>

### **Low VMT Area Screening**

Projects located within a low VMT generating area as determined by the analyst (e.g., development in efficient areas of the County will reduce VMT per person/employee and is beneficial to the region) should not be required to complete a VMT assessment as they are presumed to result in a less than significant VMT impact.

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<sup>1</sup> Public Resources Code, § 21155

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 VMT per service population is lower than the County average total daily VMT per service population.

The SBCTA VMT Screening Tool was used to assess low VMT area screening for the project. The SBCTA VMT Screening Tool was developed using the SBTAM travel forecasting model to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs) within the SBCTA region. 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 land uses within that TAZ and there does not appear to be anything unique about the project that would otherwise be mis-represented utilizing the data from the SBCTA VMT Screening Tool. In accordance with the County guidelines, VMT for employment projects, such as the proposed industrial use, is calculated on the basis of VMT per worker. For screening purposes, a low VMT area is defined as a TAZ with VMT that does not exceed the County-established significant impact threshold of four percent (4%) below the existing baseline VMT per worker for the unincorporated San Bernardino County region. Figure 1 shows the SBCTA VMT Screening Tool results for the proposed project.

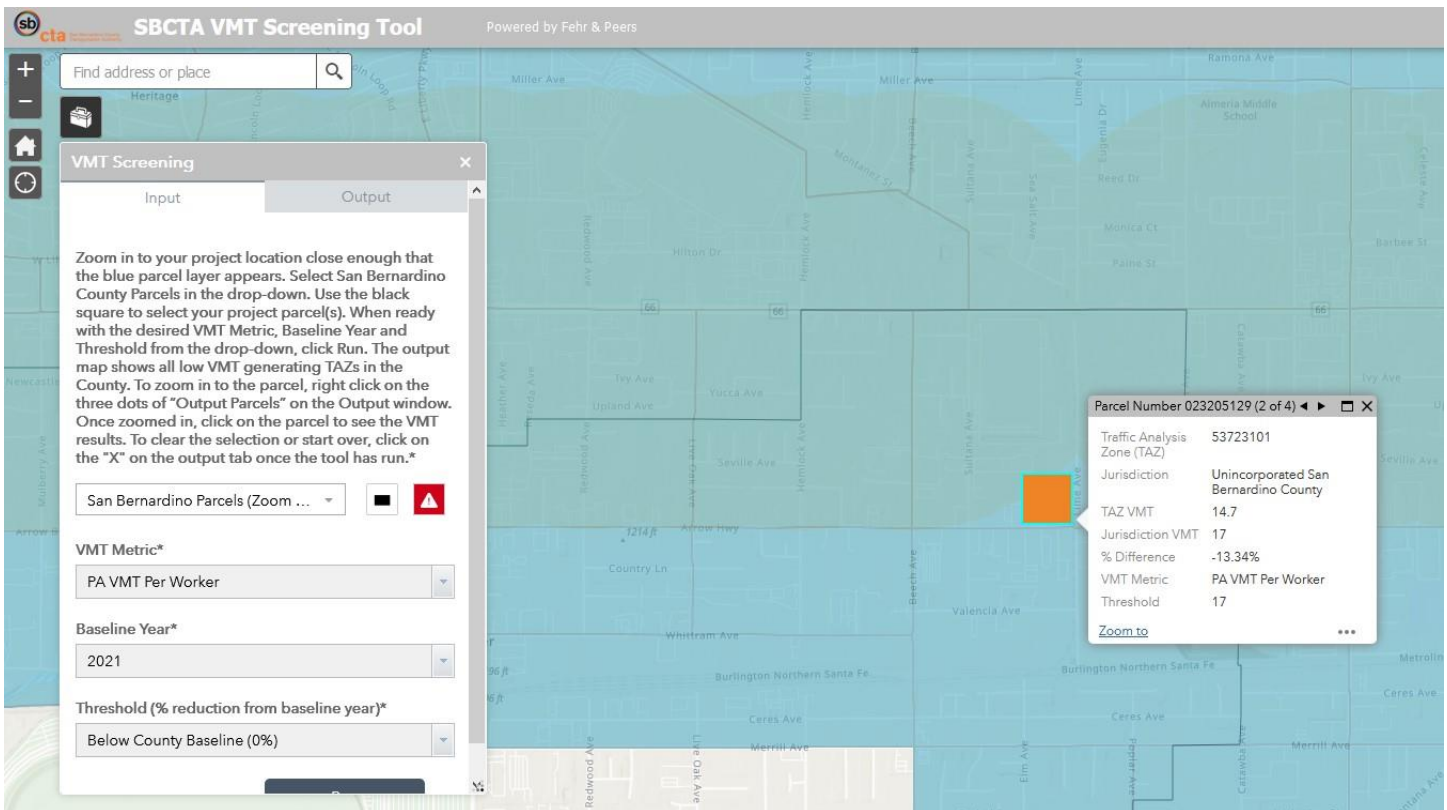


Figure 1 – SBCTA VMT Screening Tool Results for the Project

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Based on the SBCTA VMT Screening Tool assessment, the proposed project is located within TAZ 53723101, which generates 14.7 VMT per worker. The County-established threshold is equal to 16.3 VMT per worker based on the existing baseline (year 2021) of 17.0 VMT per worker for unincorporated San Bernardino County. Therefore, the proposed project is located in a low VMT area that would reduce VMT per worker for the region, thus satisfying the County-established screening criteria for projects located in low VMT areas and may be presumed to result in a less than significant VMT impact.

## CONCLUSION

The proposed project satisfies the County-established screening criteria for projects located in low VMT areas 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

