

January 12, 2021

Ms. Deirdre McCollister
MIG
1650 Spruce Street, Suite 102
Riverside, California 92507

**SUBJECT: 6TH STREET PROPERTIES SUB FUND, LLC WAREHOUSE (PREA-2020-00163) VEHICLE
MILES TRAVELED (VMT) ANALYSIS**

Dear Ms. Deirdre McCollister:

The following Vehicle Miles Traveled (VMT) Analysis has been prepared for the proposed 6th Street Properties Sub Fund, LLC Warehouse development (**Project**), which is located at 24712 6th street, in the County of San Bernardino.

PROJECT OVERVIEW

The Project is proposed to consist of a single building with 179,000 square feet of warehousing use (which includes 10,000 square feet of office space).

BACKGROUND

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate takes effect July 1, 2020.

It is our understanding that the County of San Bernardino utilizes the San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool (**Screening Tool**). The Screening Tool allows users to input an assessor's parcel number (APN) to determine if a project's location meets one or more of the screening thresholds for land use projects identified in the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (**Technical Advisory**). (1)

The focus of this memorandum is to more thoroughly evaluate each of the applicable screening thresholds to determine if the proposed Project would be expected to cause a less-than-significant impact to VMT without requiring a more detailed VMT analysis. The screening thresholds are not met, then project generated VMT will be calculated and compared to the applicable VMT threshold as

identified in the San Bernardino County Transportation Impact Study Guidelines (**County Guidelines**) (2)

PROJECT SCREENING

The County Guidelines provides details on appropriate “screening thresholds” that can be used to identify when a proposed land use project is anticipated to result in a less-than-significant impact without conducting a more detailed analysis. Screening thresholds are broken into the following three types:

- Transit Priority Area (TPA) Screening
- Low VMT Area Screening
- Project Type Screening

A land use project need only to meet one of the above screening thresholds to result in a less-than-significant impact.

TPA SCREENING

Consistent with guidance identified in the Technical Advisory, County Guidelines note that projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing “major transit stop”¹ or an existing stop along a “high-quality transit corridor”²) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- 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);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Based on the Screening Tool results presented in Attachment A, the Project site is not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor.

The TPA screening threshold is not met.

¹ Pub. Resources Code, § 21064.3 (“‘Major transit stop’ means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”).

² Pub. Resources Code, § 21155 (“For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.”).

LOW VMT AREA SCREENING

As noted in the Technical Advisory, “residential and office projects that locate in areas with low VMT and that incorporate similar features (density, mix of uses, and transit accessibility) will tend to exhibit similarly low VMT.” (1) The Screening Tool uses the sub-regional San Bernardino Transportation Analysis Model (SBTAM) to measure VMT performance within individual traffic analysis zones (TAZ’s) within the region. The Project’s physical location, based on parcel number, is input into the Screening Tool to determine project generated VMT. The Project is located in Assessor Parcel Number (APN) 027819137 and TAZ 53805201. The parcel containing the proposed Project was selected and the Screening Tool was run for Production/Attraction (PA) Home-Based Work VMT per Worker measure of VMT.

County Guidelines indicate that projects with VMT per employee lower than 4% below the existing VMT per person for the unincorporated County are considered to have a less than significant impact. SBCTA has published VMT per employee values for the unincorporated County region for both the SBTAM Base Year (2016) model and the Horizon Year (2040) model. Based on the Screening Tool results (see Attachment A), the VMT per Worker for TAZ 53805201 is 16.5. Using linear interpolation between the Base Year (2016) and Horizon Year (2040) VMT per employee values published by SBCTA for unincorporated County of San Bernardino, the unincorporated County existing (2020) VMT per employee is 19.74. Therefore, the Project resides within a TAZ that generates VMT per employee 16.4% below the County existing VMT per employee threshold.

In addition, a review of the socio-economic data contained within TAZ 53805201 was found to include industrial employment type, which is consistent with the proposed Project’s land use. The Project is found to be located in a low VMT generating area and would be consistent with the underlying land use assumptions in the model.

The Low VMT Area screening threshold is met.

PROJECT TYPE SCREENING

The County Guidelines identifies that 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. In addition to local serving retail, other types of local serving uses (e.g., day care centers, non-destination hotels, affordable housing, places of worship, etc.) may also be presumed to have a less than significant impact as their uses are local serving in nature and would tend to shorten vehicle trips. The proposed Project is anticipated to not include local serving uses.

The Project Type screening threshold is not met.

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CONCLUSION

Based on our review of applicable VMT screening thresholds, the Project meets the Low VMT Area screening and would therefore be presumed to result in a less than significant VMT impact. The Project was not found to meet the TPA or Project Type screening, however meeting the Low VMT Area screening is sufficient to determine a less than significant impact; no additional VMT analysis is required.

If you have any questions, please contact me directly at aevatt@urbanroads.com.

Respectfully submitted,

URBAN CROSSROADS, INC.



Aric Evatt, PTP
President



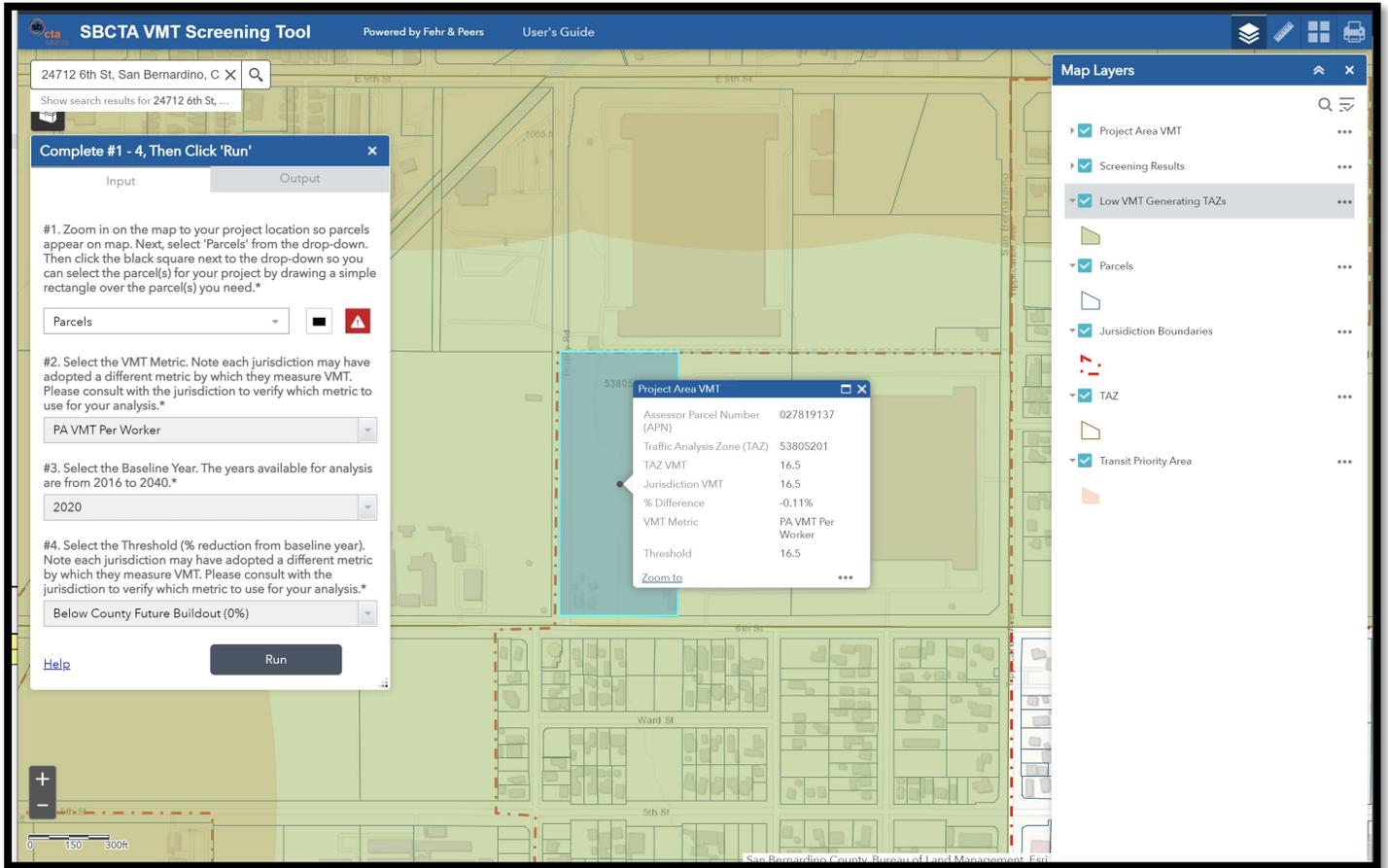
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REFERENCES

1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
2. **San Bernardino County.** *Transportation Impact Study Guidelines.* July 2019.

**ATTACHMENT A:
SCREENING TOOL**



SBCTA Published VMT per Worker Values for SBTAM Base Year and Horizon Year

GEOGRAPHY	SBTAM Base Year - 2016		SBTAM Horizon Year - 2040	
	VMT Summary HBW		VMT Summary HBW	
	HBW VMT	HBW VMT per Worker	HBW VMT	HBW VMT per Worker
Unincorporated County	1,321,314	19.49	2,235,324	20.97