

APPENDIX F

VMT Assessment



TO: Sam Friedman; Belfield Development, LLC

FROM: Jonathan Sanchez, PE, TE, PTOE

DATE: July 31, 2024

RE: Landers Boutique Hotel – VMT Assessment

The purpose of this technical memorandum is to assess vehicle miles traveled (VMT) impacts in relation to the Landers Boutique Hotel Project (the “Project”). The VMT analysis conducted herein is consistent with the County of San Bernardino *Traffic Impact Study Guidelines* (TISG, July 2019) as well as with the California Environmental Quality Act Guidelines (CEQA 2024).

Project Description

The Project site is located east of Belfield Boulevard, between Reche Road and Park Lane in the unincorporated community of Landers within the County of San Bernardino. **Figure 1** displays the Project’s regional location and **Figure 2** displays the Project’s site plan.

The Project proposes to construct a single-story boutique hotel with 35 guest rooms and supporting amenities which include a pool, yoga/fitness room, goods market, and a restaurant. The operations of the Project will be staffed 24 hours a day, ensuring a respectful business within the community. The market will be open from 7 AM to 3 PM, while the restaurant will be open from 12 PM to 10 PM. The Project’s goal is to offer the local community, including guests and tourists, a coveted space to enjoy together.

Project Trip Generation

The *Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition* (ITE Trip Generation Manual) does not provide appropriate trip generation rates for land uses proposed by the Project. Below are the land uses associated with lodging as identified within the ITE Trip Generation Manual:

- **Hotel (ITE Land Use Code 310)** – The average number of rooms is 148, with supporting facilities such as a full-service restaurant, cocktail lounge, meeting rooms, banquet room, convention facilities, swimming pool, and a fitness room.
- **All Suites Hotel (ITE Land Use Code 311)** – The average number of rooms is 147, with supporting facilities such as a restaurant and lounge along with small amounts of meeting space. Each suite includes a separated sitting room and bedroom with an in-room kitchen.
- **Business Hotel (ITE Land Use Code 312)** – The average number of rooms is 136 room, with supporting facilities such as a breakfast buffet bar/afternoon beverage bar, full-service restaurant bar, pool, and fitness center.
- **Motel (ITE Land Use Code 320)** – The average number of rooms is 109 with few supporting facilities.
- **Resort Hotel (ITE Land Use 330)** – The average number of rooms is 524 with supporting facilities such as full-service restaurants, cocktail lounges, retail shops, and a wide variety of recreational facilities/programs.



PROJECT
2235 LAN

OWNER
BELFIELD DEVELOPMENTS LLC
c/o SAM FRIEDMAN
(310) 498-3934

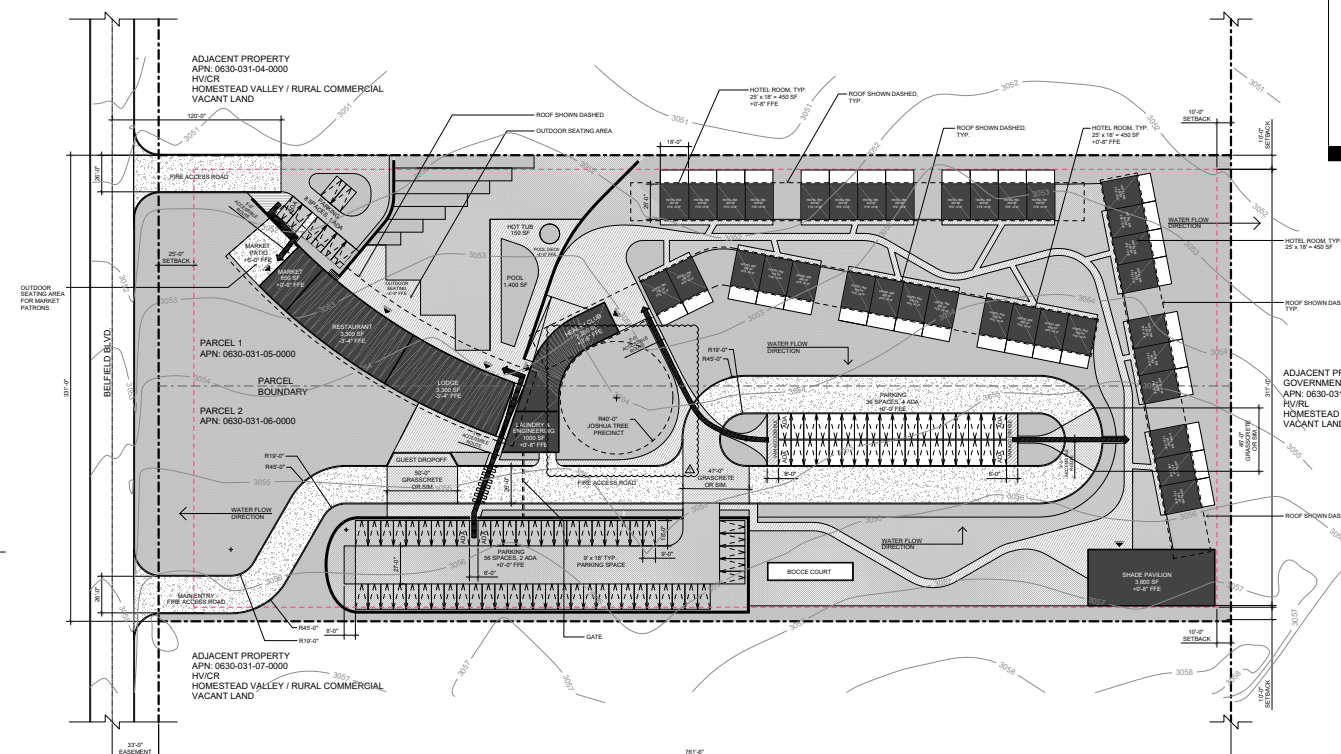
MUP SUBMISSION

[illegible]

SITE PLAN

DATE	02/19/2024
PROJECT NO.	2235
DRAWN BY	JR
CHK BY	JK






A-100



SIGNAGE
Ground-mounted monument signage facing Belfield Blvd. and building-mounted signage will be part of the project, but pursued under a separate permit.

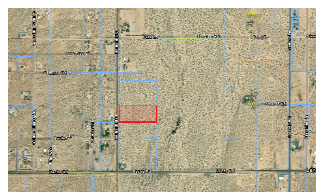
EXTERIOR LIGHTING
Exterior lighting will be a combination of building-mounted lighting and distributed low-voltage trail lighting along the site pathways. All fixtures will be fully shielded such that they emit no light above the horizontal plane.

LANDSCAPE KEY

-  CONCRETE PAVING
 LANDSCAPING
 GRASSCRETE PAVERS
OR SIMILAR
 WOOD BOARDWALK
 COMPACTED EARTH,
DECOMPOSED GRANITE,
OR SIM

SITE PLAN | 1" = 40' | 1

VICINITY MAP



LEGAL DESCRIPTION

GOVERNMENT LOT 7 OF SECTION 7, TOWNSHIP 2 NORTH,
RANGE 6 EAST, SAN BERNARDINO BASE AND MERIDIAN, IN THE
COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA,
ACCORDING TO THE OFFICIAL PLAT THEREOF.

UTILITIES

Water
Bighorn Desert View Water Agency
(760) 364-2315

Electric
So Cal Edison
(800) 655-4555

Gas
So Cal Gas
(800) 427-2200

Internet
Spectrum
(866) 739-3235

Sewage
Spectic - N/A

OWNER_____

BELFIELD DEVELOPMENTS LLC
c/o SAM FRIEDMAN
(310) 498-3934

LOT COVERAGE + FAR

LAND USE / ZONING	HV / CR HOMESTEAD VALLEY RURAL COMMERCIAL
LOT SIZE	252,450 SF (5.80 ac)
BUILDING FOOTPRINT	30,000 SF
IMPERVIOUS SURFACES	43,000 SF
TOTAL COVERAGE	73,000 SF

PROPOSED FAR	0.12	(30,000 SF)
MAX FAR	0.3	(75,735 SF)
LOT COVERAGE %	0.29	(73,000 SF)
MAX LOT COVERAGE %	0.8	(201,960 SF)

LANDSCAPED AREA REQ'D	0.2	(50,490 SF)
LANDSCAPE AREA PROVIDED	0.54	(135,700 SF)

TYP. BUILDING HEIGHT	20'-0"
MAX BUILDING HEIGHT	25'-0"

PARKING ANALYSIS

PROGRAM	AREA	PARKING RATE	REQUIRED	PROVIDED
RESTAURANT	3,300 SF (1,000 SF Kitchen)	100 or 1/3 of fixed seats (125) or 1/50 SF of seating area (2300 sf)	33 or 42 or 46	46 (2 ADA)
LODGE (HOTEL LOBBY) COMMUNITY MARKET	3,300 SF 850 SF	N/A* 1000	0 4 (MIN)	0 8 (1 ADA)
HEALTH CLUB	2,200 SF	250	9	9 (1 ADA)
LAUNDRY + ENGINEERING	1,000 SF	1000	0	0 (1 ADA)
GADE STRUCTURE**	3,600 SF	N/A**	0	36 (2 ADA)
GUEST ROOMS (35)	15,750 SF	1	35	
TOTAL	30,000 SF		82	100 TOTAL

*PARKING RATES FOR PROGRAMS DESIGNATED FOR OVERNIGHT GUEST USE ARE NOT COUNTED TOWARDS THE PARKING TOTAL.

*THE SHADE STRUCTURE IS INTENDED FOR THE USE OF HOTEL GUESTS.

PROJECT SCOPE

This Minor Use Permit and Lot Merger application is for a ground-up 35-room lodge in Landers, CA. The main lodge includes a lobby, restaurant, bar, and goods market intended to sell coffee, snacks, and essentials to the local community. The grounds also include a pool, hot tub, wellness center, and shade pavilion. The operations will be staffed 24 hours/day, ensuring a respectful business within the community. The market will be open from 7 am-3 pm. The restaurant (75 indoor seats, 50 outdoor seats) will be open from 12 pm-10 pm. With a view of Goat Mountain, this project hopes to offer the local community a coveted space to enjoy together with visiting guests.

APN

PARCEL 1: 0630-031-05-0000
PARCEL 2: 0630-031-06-0000

Figure 2
Project Site Plan

Based on the average number of rooms and amenities described above, the “Motel” land use most accurately resembles the land uses proposed by the Project. Of the four options, the “Motel” land use has the lowest average room count, closest to the Project’s proposed 35 rooms, and its “few supporting facilities” description most closely resembles the Project’s supporting facilities. ITE Trip Generation Manual excerpts are provided in **Attachment A**.

Utilizing ITE’s trip rates for a “Motel” land use, **Table 1** displays the projected daily and AM/PM peak hour project trip generation.

Table 1 - Project Trip Generation

Land Use	Units	Trip Rate	ADT	AM Peak Hour					PM Peak Hour				
				%	Trips	Split	In	Out	%	Trips	Split	In	Out
Motel	35 Rooms	Based on Fitted Curve Equation ¹	97	18.5	18	37:63	7	11	20.6	20	54:46	11	9

Source: ITE Trip Generation Manual 11th Edition; CR Associates (2024)

Note:

¹T = 3.62(X) – 29.43. Where X is the number of rooms. Per the ITE Trip Generation Handbook, a fitted curve equation shall be used when a fitted curve is provided, the curve has an R² of at least 0.75, the fitted curve falls within data cluster, and the weighted standard deviation is more than 55 percent of the weighted average rate. See Attachment A for details on trip generation.

As shown, the Project is anticipated to generate a total of 97 average daily trips (ADT) including 18 (7 -in/11-out) trips during the AM peak hour and 20 (11-in/9-out) trips during the PM peak hour.

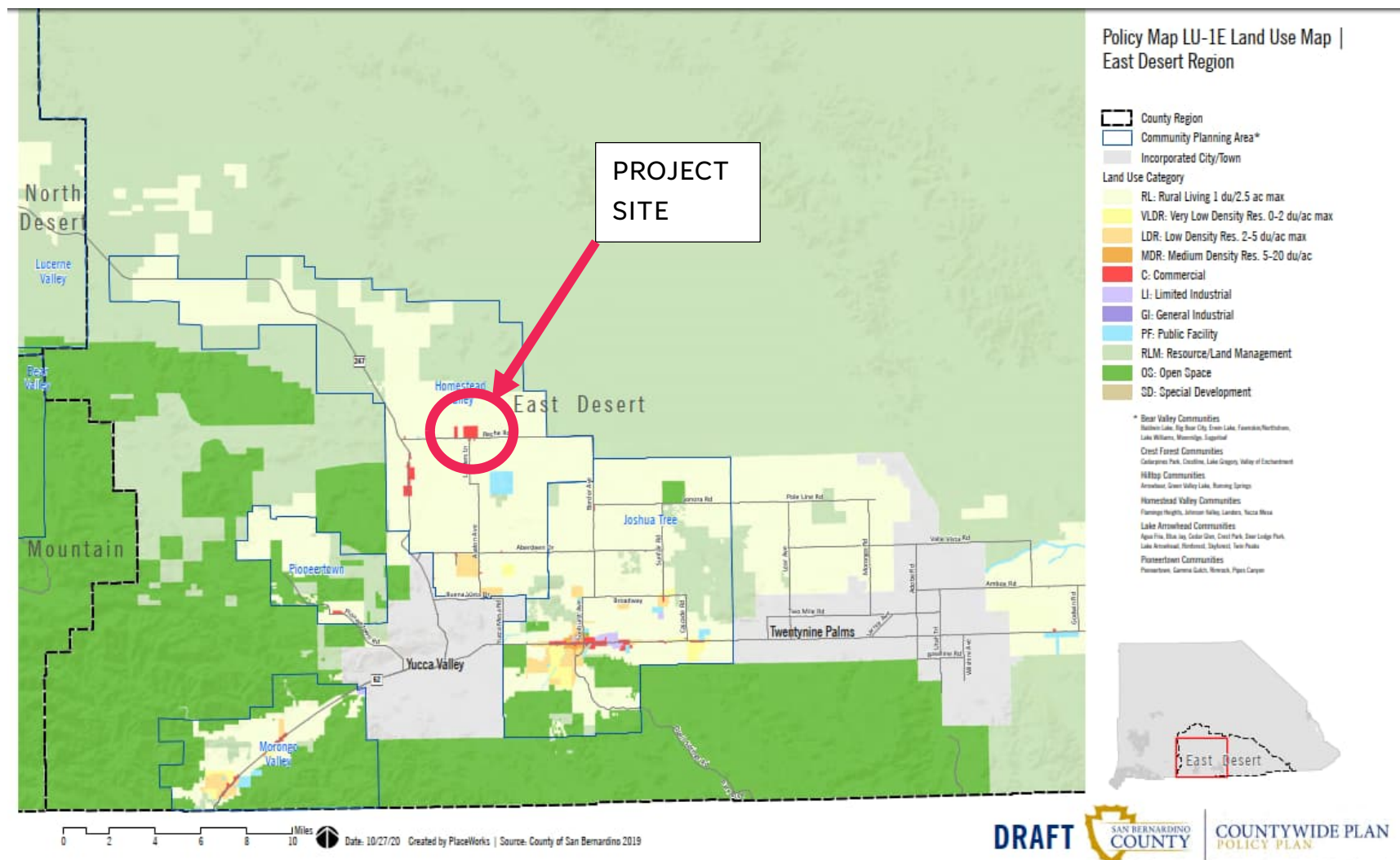
Consistency with General Plan (Countywide Plan – CWP) and SCAG RTP/SCS (2020 Connect SoCal Plan)

The San Bernardino Countywide Plan was adopted by the Board of Supervisors on October 27, 2020. This plan is a comprehensive update and expansion of the County’s General Plan addressing various issues such as physical, social, and economic concerns in both incorporated and unincorporated areas of the county. Per the Countywide Plan, the Project is considered an allowable use under the site’s current “Commercial” land use designation, which is defined as:

- An employment generating land use
- Provides suitable locations for retail, office, and service commercial businesses that serve the needs of local residents, regional markets, and visitor/tourists
- Provide employment opportunities for residents in the surrounding area
- Allow for a mix of commercial and lower density residential uses in rural areas (when residential is permitted in the underlying zoning district)
- Typical uses may include:
 - Retail stores and personal services
 - Office and professional services
 - **Lodging**, recreation, and entertainment
 - Heavy commercial with adequate buffering for surrounding residential uses
 - In rural areas: agriculture and lower density residential

Figure 3 displays the project site location in the Countywide Plan land use map. As discussed in the Project Description, the Proposed Project consists of a single-story boutique hotel with supporting amenities such as a pool, goods market, and a restaurant intended to serve both the community and tourists who visit the community. Therefore, the intent of the project is to function as a locally serving commercial business providing employment and retail/restaurant opportunities to existing residents of Landers and nearby communities, which further enhances the Project’s consistency with the Countywide Plan.

Figure 3 – Countywide Plan Land Use Map (East Desert Region)



Additionally, it is important to note that the maximum allowed density allowed for the project site is anticipated to generate more vehicular trips than those generated by the Proposed Project. The project site is designated as “Commercial” and zoned Homestead Valley/Commercial Rural (HV/CR), with a maximum FAR of 0.75.

Table 2 below displays the trip generation comparison between the Project and the maximum allowed density of the project site according to the Countywide Plan.

Table 2 - Trip Generation Comparison

Land Use	Units	Trip Rate	ADT	AM Peak Hour					PM Peak Hour				
				%	Trips	Split	In	Out	%	Trips	Split	In	Out
Motel “Proposed Project”	35 Rooms ¹	Based on Fitted Curve Equation ³	97	18.5	18	37:63	7	11	20.6	20	54:46	11	9
Motel “Countywide Plan”	221 Rooms ²	Based on Fitted Curve Equation ³	771	9.1%	70	37:63	26	44	8.3%	64	54:46	35	29

Source: ITE Trip Generation Manual 11th Edition; CR Associates (2024)

Notes:

¹ Lot size is 252,450 sq.ft. with an FAR of 0.12, the developable area is 30,000 sq.ft that accommodates the proposed project with 35 rooms.

² Lot size is 252,450 sq.ft. with an FAR of 0.75, the developable area is 189,338 sq.ft.. If it is assumed that for every 30,000 square feet, 35 rooms could be accommodated, this would yield a total of approximately 220 rooms (189,338 divided by 30,000 X 35 rooms = 221 rooms).

³ $T = 3.62(X) - 29.43$. Where X is the number of rooms. Per the ITE Trip Generation Handbook, a fitted curve equation shall be used when a fitted curve is provided, the curve has an R² of at least 0.75, the fitted curve falls within data cluster, and the weighted standard deviation is more than 55 percent of the weighted average rate. See Attachment A for details on trip generation.

As shown, the max density allowed under the project site’s land use designation and zoning would generate more vehicular trips when compared to the Project.

CEQA Vehicle Miles Traveled (VMT) Screening Criteria

The County of San Bernardino TISG provide screening criteria that can be used to identify when a proposed land use project is presumed to have a less than significant impact without conducting a detailed VMT analysis. The following screening thresholds are included within the County of San Bernardino TISG:

1. Transit Priority Area (TPA) Screening
2. Project Type Screening
3. Low VMT Area Screening

Land development projects that satisfy one or more of the above screening criteria may be presumed to have a less than significant impact absent substantial evidence to the contrary.

Transit Priority Area (TPA) Screening

Projects located within a TPA may be presumed to have a less than significant impact absent substantial evidence to the contrary. A TPA is defined as a half mile distance from an existing major transit stop or an existing stop along a high-quality transit corridor.

The Project is not located within a TPA. Therefore, the Project does not satisfy the TPA Screening criteria.

Project Type Screening

The County of San Bernardino TISG provides a list of uses that, at the discretion of the County, may be presumed to have a less than significant impact, including local serving uses and projects that generate less than 110 daily vehicle trips¹. As shown in Table 1, the Project generates 97 daily vehicle trips which is less than the 110 daily trips threshold. Thus, the Project satisfies the Project Type Screening requirement.

Low VMT Area Screening

Projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. A low VMT area is defined as an individual traffic analysis zone (TAZ) where total daily origin/destination VMT per service population is lower than the county average total daily Origin/Destination VMT per service population. The San Bernardino County Transportation Authority (SBCTA) screening tool should be utilized to identify if the project is in a low VMT-generating area. Additionally, the project should be consistent with existing land use in the area, expected to contribute VMT consistent with existing land use in the area, and not significantly alter travel patterns in the area.

The Project proposes to construct a hotel within a TAZ composed primarily of other lodging facilities. However, as determined by the SBCTA VMT Screening Tool, the Project is located within a high VMT area where the total daily origin/destination VMT per service population is higher than the county average total daily Origin/Destination VMT per service population. Therefore, the Project does not satisfy the Low VMT Area Screening criteria. Table 3 provides a summary of the SBCTA VMT Screening Tool results and Figure 3 displays the screening results.

Table 3 - SBCTA VMT Screening Tool Results

VMT Metric	County of San Bernardino VMT	Project TAZ	% of County of San Bernardino VMT	Below County of San Bernardino Average?
VMT per Service Population	44.9	55.4	123.4%	No

Source: SBCTA VMT Screening Tool (2024); CR Associates (2024)

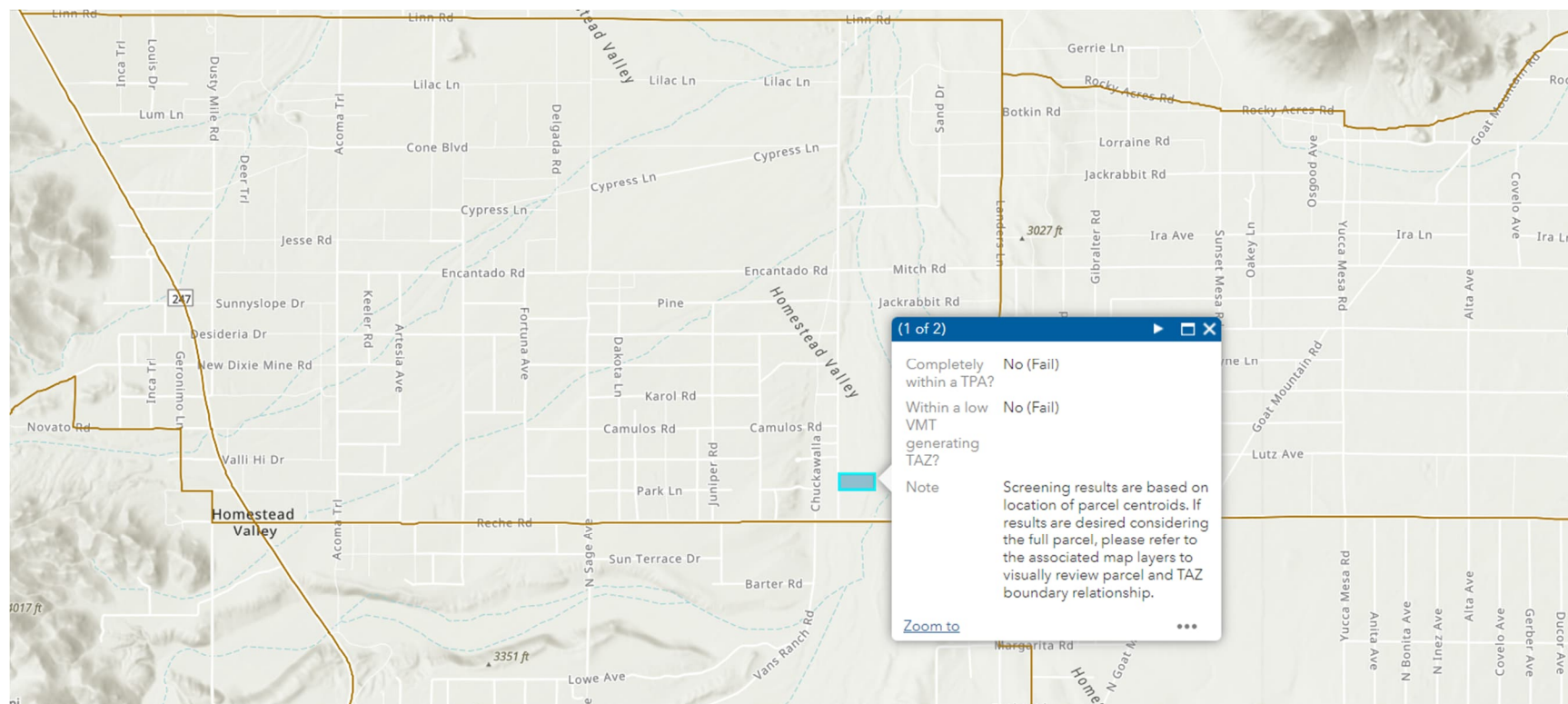
Additional VMT Considerations

According to Section 15064.3 “Determining the Significance of Transportation Impacts” of the 2024 CEQA Statute & Guidelines, projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. This typically includes local-serving land uses. While a “local serving business” category is not included in the Governor’s Office of Planning and Research (OPR) Technical Advisory screening criteria, the technical advisory does state the following for local serving land uses, such as local serving retail:

“Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts. By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact.”

¹ Consistent with both the County’s guidelines as well as the State’s Office of Planning and Research Technical Advisory: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Figure 3 - SBCTA Screening Tool Results



Similar to local serving retail, local serving businesses redistribute and capture trips rather than create new trips. Thus, trips are generally shortened as longer trips from a regional facility are redistributed or captured to the local serving business facility. As shown in **Figure 4**, based on a Geographical Information System (GIS) analysis and aerial imagery the nearest lodging facilities similar to the Project are Lone Tree Ranch, La La Landers, The Golden Barrel, and Liberty Ranch, all of which are located within a 3-mile radius (driving distance – one way) of the Project site. Thus, with the implementation of the Project, it would provide another lodging and local employment option within Landers. Therefore, existing trips made by hotel employees and patrons of the hotel could be internalized and captured within Landers and the surrounding communities, resulting in shortened vehicular trips and reduction in VMT. Reduction in VMT would further aid the efforts of achieving the County of San Bernardino's long-term climate goals of reducing GHG emissions.

Additionally, the Landers community is largely made up of local serving businesses that support tourists visiting the nearby Joshua Tree National Park, located 21 miles south of the Project site. While the Project would serve the occasional tourist to Joshua Tree National Park, the existence of the Project alone is not likely to determine a tourists' decision to travel to the park or to the Project area in Landers. In other words, tourists seeking lodgings within Landers and the surrounding communities would visit regardless of the presence of the Project, further indicating the local-serving nature of the Project.

Consistent with the OPR Technical Advisory screening criteria and based on the assumption that the Project would be a locally serving development, the Project is presumed to have a less than significant transportation impact and exempt from further VMT analysis.

Conclusion

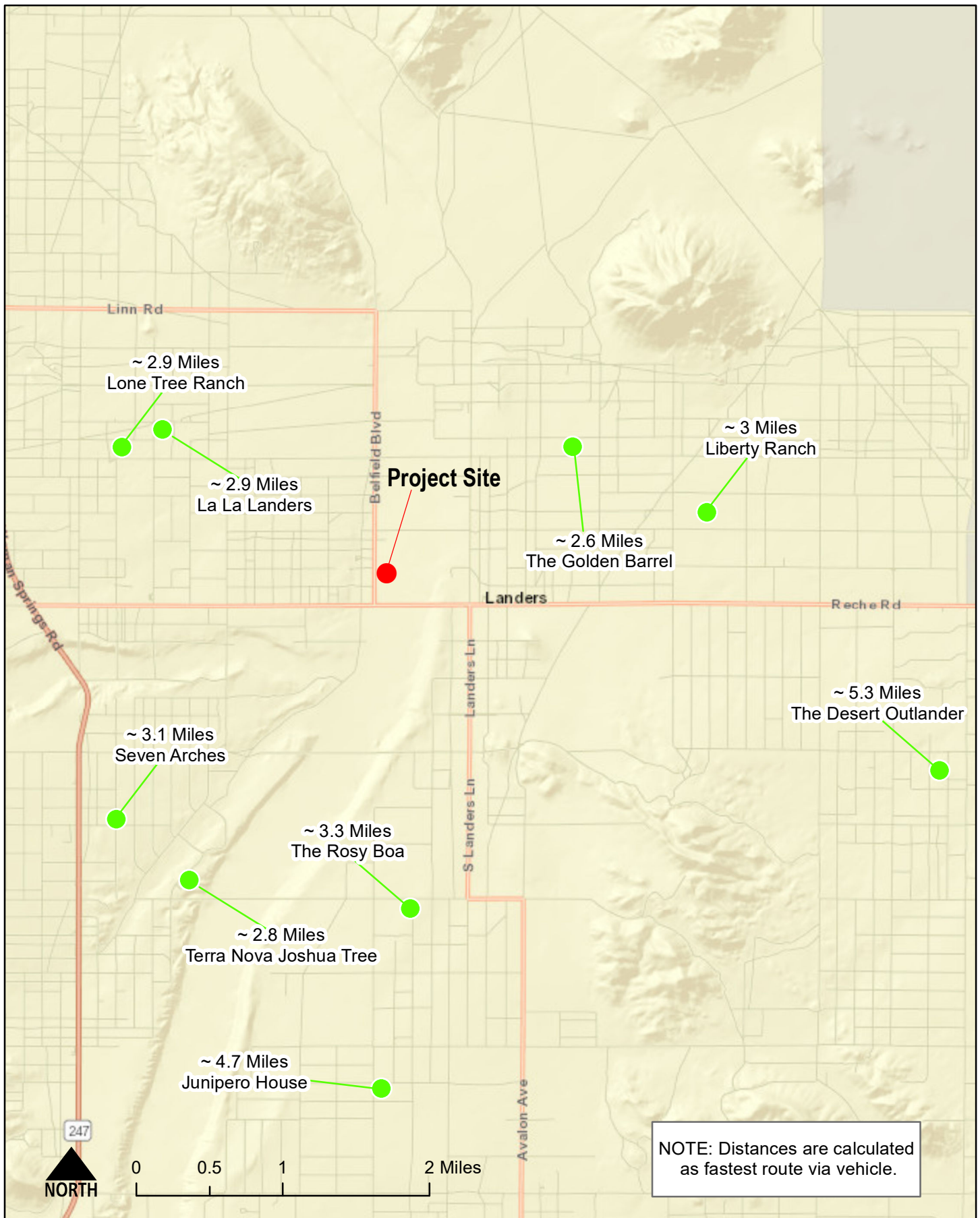
Based on review of the County of San Bernardino TISG and VMT Screening Criteria, the Project satisfies the Low VMT Screening criteria. Additionally, it will operate as a locally serving business as it will provide local employment and retail opportunities for existing residents of Landers and nearby communities as well as to capture trips of tourists within the area. Therefore, the Project is presumed to have a **less than significant VMT impact**, and no additional VMT analysis is required.

Sincerely,



Jonathan Sanchez, PE, TE, PTOE
Lic. No. TE#2957





Attachment A - ITE Trip Generation Manual Excerpts

Land Use: 320

Motel

Description

A motel is a place of lodging that provides sleeping accommodations and provides little or no meeting space and few supporting facilities. Exterior corridors accessing rooms (immediately adjacent to a parking lot) is common for a motel. Hotel (Land Use 310), all suites hotel (Land Use 311), business hotel (Land Use 312), and resort hotel (Land Use 330) are related uses.

Additional Data

Sixteen studies provided information on occupancy rates at the time the studies were conducted. The average occupancy rate for these studies was approximately 82 percent.

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in California, Florida, Indiana, New Jersey, New York, Oregon, South Dakota, and Texas.

For all lodging uses, it is important to collect data on occupied rooms as well as total rooms in order to accurately predict trip generation characteristics for the site.

Source Numbers

172, 187, 191, 277, 295, 300, 357, 439, 443, 598, 877, 915, 1046

Motel (320)

Vehicle Trip Ends vs: Rooms
On a: Weekday

Setting/Location: General Urban/Suburban

Number of Studies: 6

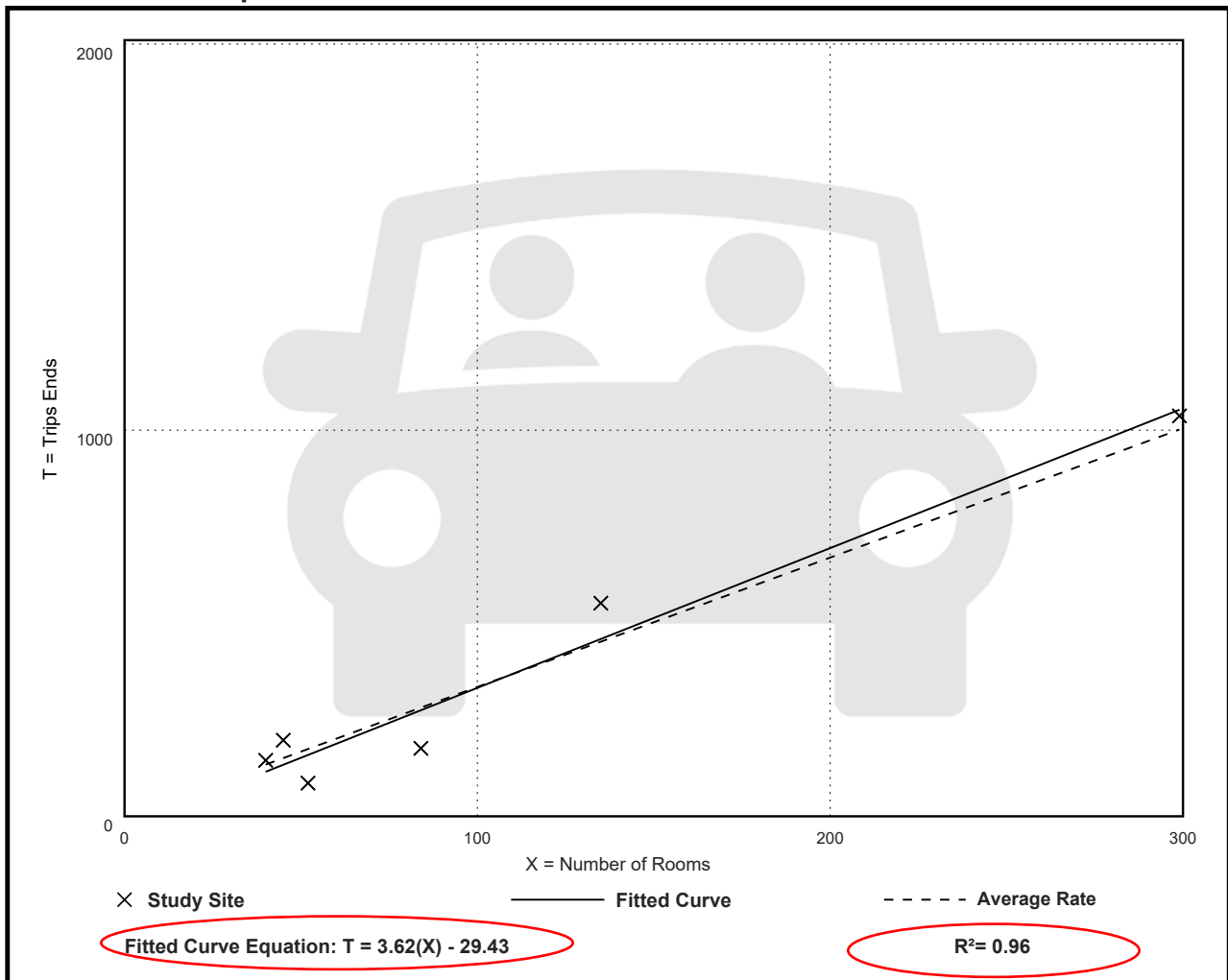
Avg. Num. of Rooms: 109

Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
3.35	1.65 - 4.38	0.87

Data Plot and Equation



Motel (320)

Vehicle Trip Ends vs: Rooms

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 15

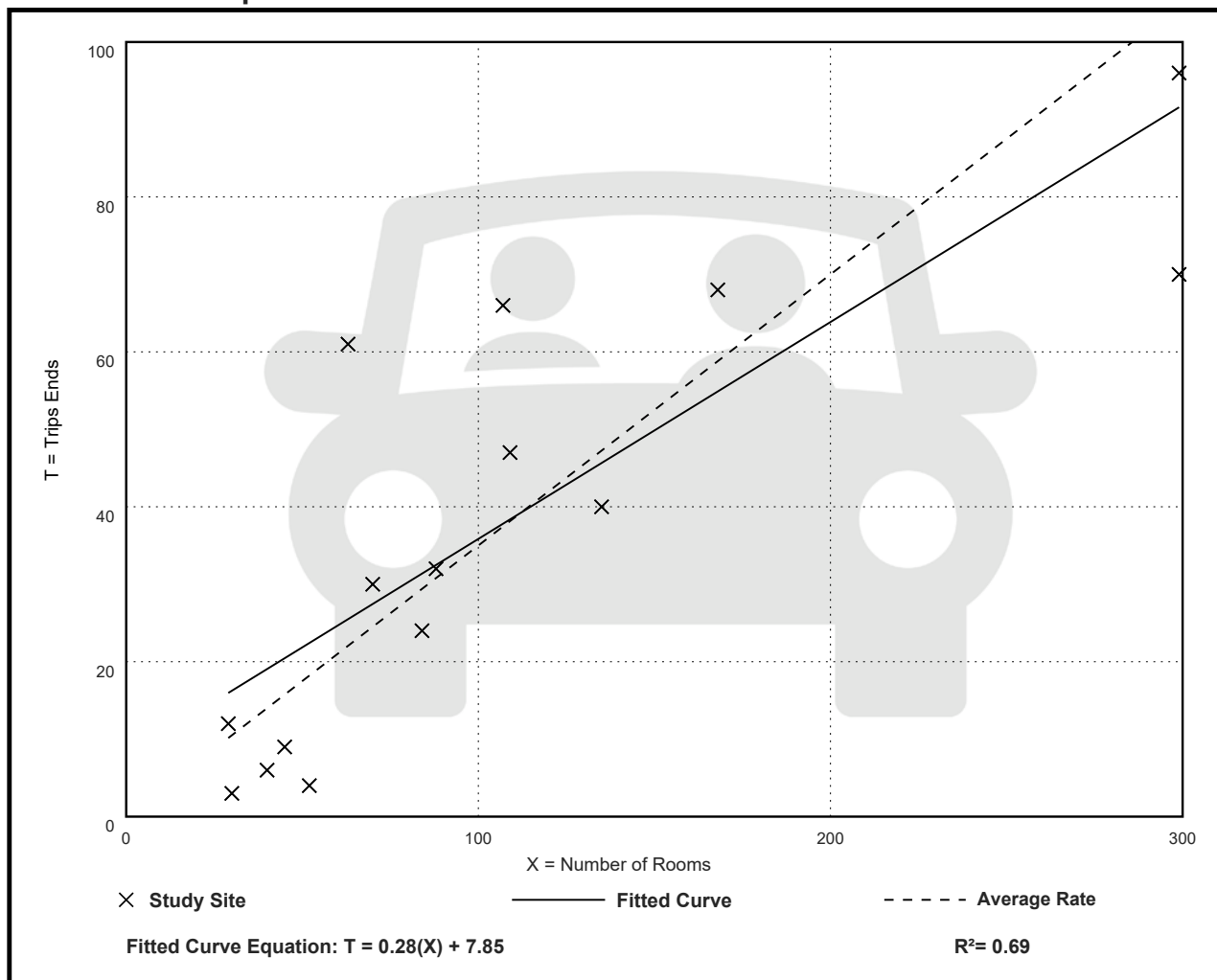
Avg. Num. of Rooms: 108

Directional Distribution: 37% entering, 63% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
0.35	0.08 - 0.97	0.18

Data Plot and Equation



Motel (320)

Vehicle Trip Ends vs: Rooms

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 20

Avg. Num. of Rooms: 98

Directional Distribution: 54% entering, 46% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
0.36	0.06 - 0.83	0.18

Data Plot and Equation

