TJW ENGINEERING, INC.

TRAFFIC ENGINEERING &
TRANSPORTATION PLANNING
CONSULTANTS

August 19, 2024

Mr. Jeremy Johnson COUNTY OF SAN BERNARDINO 825 East Third Street San Bernardino, CA 92415

SUBJECT: Maverik Fueling Station Vehicle Miles Traveled Screening, City of Pinon Hills

Dear Mr. Johnson,

TJW Engineering, Inc. (TJW) is pleased to submit this Vehicle Miles Traveled (VMT) Screening Analysis for the proposed Maverik Fueling Station in the City of Pinon Hills, California. The purpose of this memorandum is to evaluate the need to prepare a VMT analysis for the proposed project based on the Governor's Office of Planning and Research (OPR) 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR Technical Advisory) (December 2018) and the San Bernardino County Transportation Authority (SBCTA) Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (SBCTA Guidelines) (February 2020).

Project Description

The proposed project includes a gasoline station with twenty (20) pumps for standard passenger vehicles, five (5) diesel fueling pumps for trucks, and a 5,637 square foot convenience store. Site access is planned via one right in/out driveway off Oasis Road and two full access driveways off Buckthorne Road. A site plan is attached for reference.

Vehicle Miles Traveled (VMT) Screening

Senate Bill (SB) 743 was adopted in 2013 requiring the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within the California Environmental Quality Act (CEQA). For land use projects, OPR has identified VMT as the new metric for transportation analysis under CEQA. The regulatory changes to the CEQA guidelines that implement SB 743 were approved on December 28th, 2018, with an implementation date of July 1st, 2020, as the new metric.

OPR Technical Advisory on Evaluating Transportation Impacts in CEQA

The OPR Technical Advisory and the CEQA Guidelines Section 15064.3(a) states "For the purposes of this section, 'vehicle miles traveled' refers to the amount of distance of automobile travel attributable to a

project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Additionally, the emissions and energy impacts of heavy-duty trucks are already regulated under other programs, such as the federal Clean Air Act. VMT analysis is intended to facilitate infill development and reduce passenger car emissions, and not to hinder goods movement and production requiring the use of heavy-duty trucks. Thus, per state guidance and regulations, heavy-duty truck VMT need not be included in VMT analysis. As the five (5) diesel fueling pumps of the proposed project will be exclusively for heavy-duty diesel trucks, the diesel fueling portion of the project screens out from a formal VMT analysis.

<u>SBCTA Reocmmended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment</u>

The SBCTA Guidelines provide direction or CEQA analysis, including screening criteria and requirements for VMT assessment of land use projects. The screening criteria categories consist of transit priority area screening, low VMT area, and project-type screening. The applicability of each of those screening criteria to the project is described below.

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 area around an existing major transit stop or an existing stop along a high-quality transit corridor.

The SBCTA VMT Screening Tool was utilized and found that the proposed project is not located within a TPA and, therefore, does not meet the TPA screening criteria.

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 area, the 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.

To identify if the project is in a low VMT-generating area, the analyst may review the SBCTA screening tool and apply the appropriate threshold (identified later in this chapter) within the tool. Additionally, as noted above, the analyst mush identify if the project is consistent with the existing land use within that

TAZ and use professional judgement that there is nothing unique about the project that would otherwise be mis-represented utilizing the data from the travel demand model.

The SBCTA VMT Screening Tool was utilized and found that the proposed project is not in a low VMT TAZ and, therefore, does not meet the low VMT area screening criteria.

Project-Type Screening

The project is presumed to have a less than significant impact if it adheres to the following criteria:

- 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)
- Projects generating less than 110 daily vehicle trips

As a local-serving gas station, the project satisfies the project-type screening criteria.

Summary

This memorandum evaluates the need to prepare a VMT analysis for the proposed project. The OPR Technical Advisory on Evaluating Transportation Impacts in CEQA indicates that heavy duty truck VMT need not be included in VMT analysis. The San Bernardino County Transportation Authority Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment indicate that local-serving gas stations may be presumed to have a less than significant VMT impact. As the proposed project consists of heavy-duty truck uses and satisfies project-type criteria, the project is exempt from further VMT analysis.

Please contact us at (949) 878-3509 if you have any questions regarding this analysis.

Sincerely,

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