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July 21, 2020

Mr. Kia Koob
Kast Construction, Inc.
4634 Saloma Avenue
Sherman Oaks, Ca 91403

SUBJECT: MISSION NEW TOWN HOUSE VEHICLE MILES TRAVELED (VMT) SCREENING ANALYSIS

Dear Mr. Kia Koob:

The following VMT Screening Analysis has been prepared for the proposed Mission New Town House (Project), which is located on the southwest corner of Mission Boulevard and Benson Drive in the City of Montclair.

PROJECT OVERVIEW

The proposed Project consists of the development of 60 townhomes on three lots. The first lot has a total of 51,770 square feet, the second lot has a total of 62,930 square feet, and the third lot has a total of 78,120 square feet.

The site is currently designated as a Single Family Residential in the City of Montclair General Plan. Trip generation rates used for this assessment are based upon information collected by the Institute of Transportation Engineers (ITE) as provided in their Trip Generation Manual (10th Edition, 2017). (1) The ITE Trip Generation Manual is a nationally recognized source for estimating site specific trip generation.

As shown in Attachment A, the resulting trip generation for the proposed Project is 568 trip-ends per day (also referred to as daily trips), with 44 trips generated during the AM peak hour and 59 trips generated during the PM peak hour.

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 went into effect July 1, 2020.

It is our understanding that the City of Montclair 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**). (2)

The focus of this memorandum is to evaluate more thoroughly 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.

PROJECT SCREENING

The Technical Advisory 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 four types:

- Project Type Screening
- Map Based Screening based on Low VMT Area
- Transit Priority Area (TPA) Screening
- Affordable Residential Development Screening

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

PROJECT TYPE SCREENING

The Technical Advisory notes projects that are consistent with the current Sustainable Communities Strategy (SCS) or general plan, and that generate or attract fewer than 110 trips per day are assumed to cause a less-than-significant impact. The proposed Project is anticipated to generate 568 daily trips and would therefore not be eligible for the project type screening threshold.

The Project Type screening threshold is not met.

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." (2) 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 as compared to either a City or County average. The parcel containing the proposed Project was selected and the Screening Tool was run for the Production/Attraction (PA) VMT per Service Population and VMT per Population measures of VMT. Based on the Screening Tool results (see Attachment B), the Project is located within a low VMT generating zone.

The Low VMT Area screening threshold is met.

TPA SCREENING

Consistent with guidance identified in the Technical Advisory, 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 B, 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.

AFFORDABLE RESIDENTIAL DEVELOPMENT SCREENING

As noted in the Technical Advisory, "Adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT." The Advisory goes on to state that "…a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT." (2)

As the proposed Project does not include an affordable housing component, this screening criteria is not applicable.

The Affordable Residential Development Screening threshold is not met.

CONCLUSION

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

[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.").

If you have any questions, please contact me directly at (949) 336-5978.

Respectfully submitted,

URBAN CROSSROADS, INC.

Aric Evatt, PTP
President

Robert Vu, PE
Transportation Engineer

REFERENCES

1. **Institute of Transportation Engineers.** *Trip Generation Manual.* 10th Edition. 2017.
2. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.

ATTACHMENT A:
PROJECT TRIP GENERATION

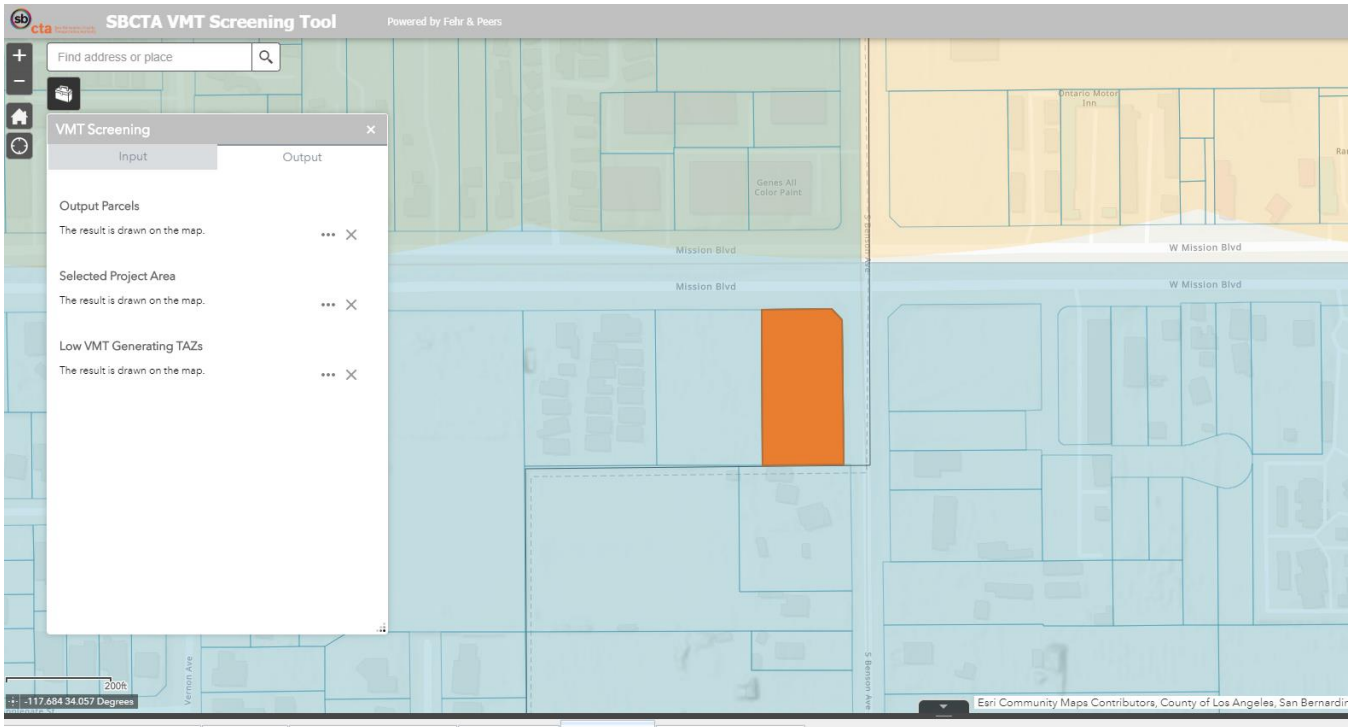
Land Use	Units[2]	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Trip Generation Rates[1]									
Single-Family Detached Housing	DU	220	0.19	0.56	0.74	0.62	0.37	0.99	9.44

Land Use	Quantity	Units[2]	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Trip Generation Summary									
Single-Family Detached Housing	60	DU	11	33	44	37	22	59	568

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).

[2] DU = Dwelling Units

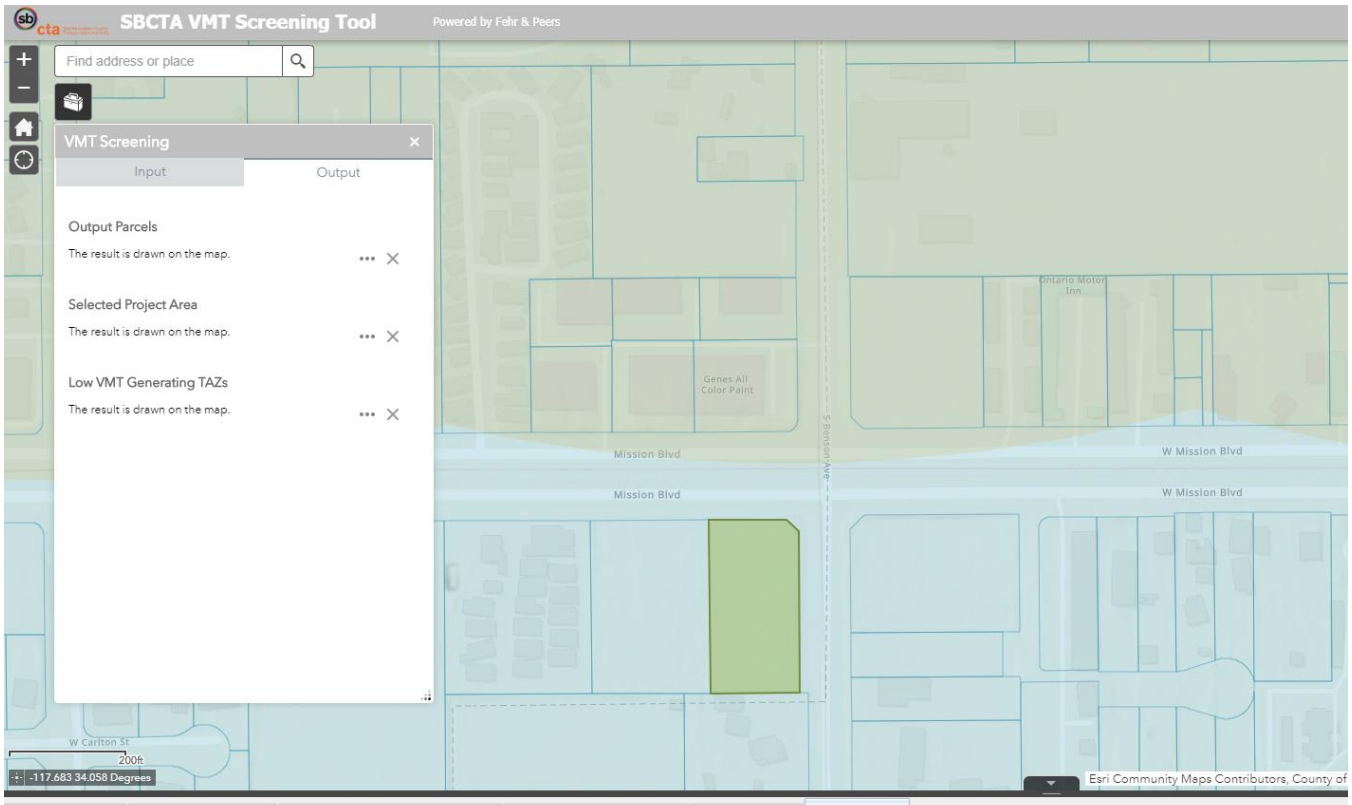
ATTACHMENT B:
SBCTA SCREENING ASSESSMENT



San Bernardino Parcels (Zoom in to view) | City Boundaries | San Bernardino County Boundary | Transit Priority Area | Output Parcels | Low VMT Generating TAZs

Options | Filter by map extent | Zoom to | Clear selection | Refresh

OBJECTID	Assessor Parcel Number (APN)	Traffic Analysis Zone (TAZ)	Community Region	Inside a Transit Priority Area (TPA)	TAZ VMT	Jurisdiction VMT	% Difference	VMT Metric	Threshold
1	101135105	53,618,201.00	Unincorporated San Bernardino County	No	21.70	26.60	-18.36%	PA VMT Per Service Population	26.60



Selected Project Area | Low VMT Generating TAZs | San Bernardino Parcels (Zoom in to view) | San Bernardino County Boundary | Transit Priority Area | Output Parcels

Options | Filter by map extent | Zoom to | Clear selection | Refresh

OBJECTID	Assessor Parcel Number (APN)	Traffic Analysis Zone (TAZ)	Community Region	Inside a Transit Priority Area (TPA)	TAZ VMT	Jurisdiction VMT	% Difference	VMT Metric
1	101135105	53,618,201.00	Unincorporated San Bernardino County	No	13.50	16.30	-17.05%	PA VMT Per Population