

APPENDIX J

VEHICLE MILES TRAVELED ANALYSIS



Vehicle Miles Traveled Analysis

Locust Gateway Logistics Center City of Rialto

Prepared for:
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June 2025

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**SB 743 VEHICLE MILES TRAVELED ANALYSIS
FOR THE PROPOSED
LOCUST GATEWAY LOGISTICS CENTER
IN THE CITY OF RIALTO**

Introduction

Senate Bill 743 (SB 743) was approved by California legislature in September 2013. SB 743 requires changes to California Environmental Quality Act (CEQA), specifically directing the Governor’s Office of Planning and Research (OPR) to develop alternative metrics to the use of vehicular “Level of Service” (LOS) for evaluating transportation projects. OPR has prepared a technical advisory (“OPR Technical Advisory”) for evaluating transportation impacts in CEQA and has recommended that Vehicle Miles Traveled (VMT) replace LOS as the primary measure of transportation impacts. This analysis was prepared to document the VMT analysis for the Rialto Locust Gateway Project following the OPR Technical Advisory (December 2018) and the City of Rialto *Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment (LOS)* (October 2024).

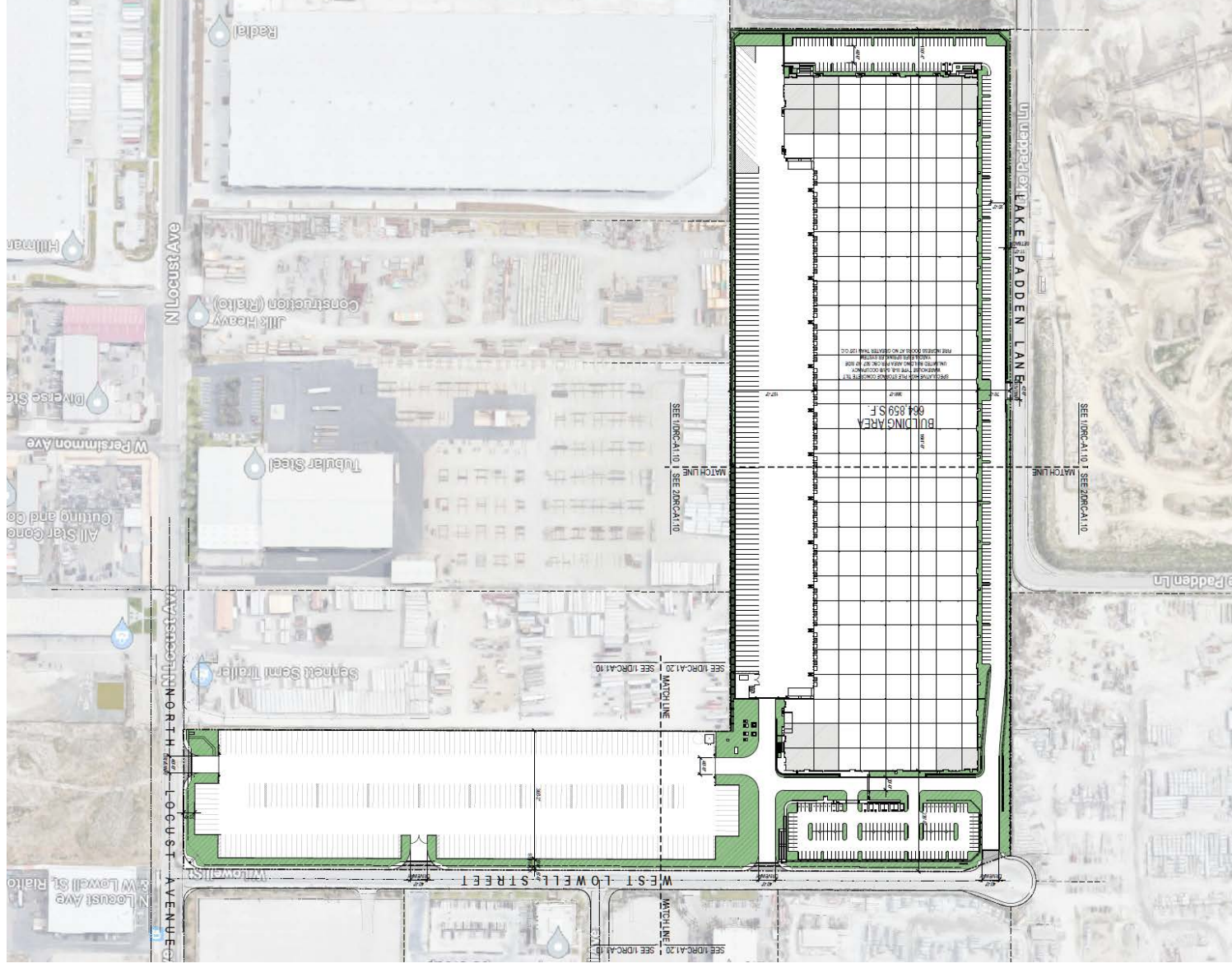
Project Overview

The project is located at the southwest corner of the intersection of Lowell Street and Locust Avenue in the City of Rialto. The project site (approximately 40 acres) is bounded by W Lowell Street to the north, N Locust Avenue to the east, and Lake Padden Lane to the west. The project site is shown in its regional setting on **Figure 1**. The project will involve the construction of a 664,859 square-foot (SF) warehouse building on a vacant parcel. A copy of the project site plan is provided on **Figure 2**. The site is located within the Rialto Airport Specific Plan, which is generally bounded by Casa Grande Drive to the north with a small portion (east of Locust Avenue) extending north to Riverside Avenue, Base Line Road to the south, Locust and Cactus Avenues to the east, and Mango and Palmetto Avenues to the west. The Rialto Airport Specific Plan area covers 3,131 acres and is approved for a variety of land uses, including residential, commercial, mixed-use, industrial, public facilities, recreation, and open space uses. The Specific Plan was anticipated for build-out in phases, over a 30-year-plus period. The Specific Plan was approved in November 1997. Four amendments to the Specific Plan were approved, with the latest amendment in November 2010. The project site area is zoned for General Manufacturing (I-GM) in the Rialto Airport Specific Plan Land Use Map.



**FIGURE 1
VICINITY MAP**

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Vehicle Miles Traveled Screening

This section documents Vehicle Miles Traveled (VMT)/SB 743 considerations for the project. The City of Rialto VMT Guidelines provide 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 level analysis. Screening thresholds are broken into the following three steps:

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

A land use project needs only meet one of the above screening thresholds to be presumed to result in not a significant impact under CEQA pursuant to SB 743.

Transit Priority Area (TPA) Screening

A project would be considered to have a less-than-significant transportation impact if the project is located within a Transit Priority Area (TPA) as determined by the most recent SCAG RTP/SCS and the San Bernardino County Transportation Authority (SBCTA) VMT screening tool. Based on SBCTA VMT screening tool, the proposed project is not located within a TPA.

The TPA Screening threshold is not met.

Low VMT Area Screening

A project would be considered to have a less-than-significant transportation impact if the project is located within a low VMT generating area as determined by the City of Rialto guidelines and the SBCTA VMT screening tool. Based on the City of Rialto VMT thresholds and the SBCTA VMT Screening Tool, the proposed project is not located within a low VMT area.

The Low VMT Area Screening threshold is not met.

Project Type Screening

A project would be considered to have a less-than-significant transportation impact if the project generates fewer than 110 daily vehicle trips. Per City of Rialto guidelines, the 110 daily vehicle trip threshold encompasses passenger vehicles only; truck trips and PCE calculations are not included in project type screening:

- Local-Serving retail less than 50,000 square feet
- 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)
- Local-serving medical
- 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)
- 15,000 sq. ft. of light industrial
- 63,000 sq. ft. of warehousing
- 79,000 sq. ft. of high cube transload and short-term storage warehouse

Based on the Project types above, the Project land uses have not been identified as having the presumption of a less than significant impact.

The Project Type Screening threshold is not met.

VMТ THRESHOLDS

Per the City's VMT Guidelines, VMT impacts are evaluated based on "project-generated VMT" and the "project effect on VMT." The "project-generated VMT" is compared to the baseline Countywide VMT efficient metric, whereas the "project-effect" effect on VMT is compared between the with and without project conditions. The following thresholds of significance apply to the VMT analysis:

1. A project's effect on VMT would be considered significant if the baseline link-level boundary (County Boundary) VMT per service population (residents + employees) increases under plus project conditions compared to no project conditions for both baseline and cumulative scenarios.
2. A project would result in a significant project-generated VMT impact if the project generated VMT per service population exceeds the San Bernardino County regional average baseline of 32.7 VMT per service population for both baseline and cumulative scenarios.

The project-generated VMT threshold value mentioned above is based on a previous version of the San Bernardino County's Travel Demand Model (SBTAM). Since the analysis was conducted using the latest version of the SBTAM, the San Bernardino County regional average for the baseline no project

condition was developed using the latest model. A project would result in a significant project-generated VMT impact if the VMT per service population exceeds the San Bernardino County regional average compared to no project conditions for both baseline and cumulative scenarios.

The Cumulative “No Project” scenario shall reflect the adopted RTP/SCS; as such, if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence.

ANALYSIS SCENARIOS

The VMT analysis was completed using the current version of San Bernardino County’s Travel Demand Model, SBTAM version 3.1 (referred to as the “SBTAM Model”). The model is trip-based and considers the interactions between different land uses based on socio-economic data (SED) such as population, households, and employment. Adjustments in SED (population and employment) were made to the appropriate Traffic Analysis Zones (TAZ) in the SBTAM Model to reflect the project’s proposed land uses.

The current version of the SBTAM Model maintains a base year condition of 2019, which was interpolated to 2024 to be representative of baseline conditions. The Cumulative Year for the SBTAM Model is 2050.

The project’s VMT analysis was conducted for baseline and cumulative scenarios and results were compared to no project and plus project conditions. The analysis includes the following scenarios:

- **Baseline Conditions** - based on 2019 SBTAM Model conditions and interpolated to 2024 conditions using Cumulative No Project Conditions.
- **Baseline Plus Project Conditions** – Based on 2019 SBTAM Model with the project land use and interpolated to 2024 conditions using Cumulative Plus Project Conditions.
- **Cumulative No Project Conditions** – Based on the updated 2050 SBTAM Model conditions without the project land use.
- **Cumulative Plus Project Conditions** – Based on the updated 2050 SBTAM Model conditions with the project land use. For this scenario, the TAZ that includes the geographic boundaries of the Project was updated to reflect the Project’s land uses. In addition, other TAZs within the City had their future land use growth totals reduced on a weighted basis by employment type to maintain regional control totals. Based on the City guidelines, it is important to maintain appropriate control totals for regional jobs to housing ratio such that the model reflects appropriate future demographic and market conditions. Simply put, the total number of jobs and housing units in the City remained the same as the Cumulative No Project Conditions even with the addition of the Project.

PROJECT LAND USE CONVERSION

To evaluate the project's VMT, the land use plan needed to be first converted into a SBTAM compatible dataset. This dataset relied on land use assumptions developed as part of the Rialto Locust Gateway Project, and the trip generation estimates for the project. To represent the project, adjustments to employment data were made to the SBTAM TAZ 53741501, which consists of the entire project site. The project's employee estimate was developed from existing warehouses' employee per square foot ratio¹. **Table 1** shows the employment information for the project that was added to the SBTAM Model.

Table 1 – Project SED Model Inputs

Input	Value
Warehouse Employment	246

The resultant land use data was coded into the SBTAM Model for analysis. For the cumulative plus project scenario, the Project's estimated employment was reallocated from other TAZs as to not change the control totals for future employment growth.

VMT ANALYSIS

Project-generated VMT is the assessment based on trips and trip distances of project-specific trip purposes. The project effect on VMT is an estimate of how VMT within the County will change once a project is built and new and existing traffic redistributes.

Production/Attraction (PA) VMT

As described in the City's TIA Guidelines, since the project does not have any residential land use it would be appropriate to assess the project-generated VMT using the production-attraction trip matrix to isolate employee commute VMT. The calculation of Home-Based-Work VMT per employee (Employee-Based VMT) using the PA method has two components – the total number of weekday trips generated and the average trip length of each vehicle. Home-Based-Work VMT per employee is determined by dividing the total Home-Based-Work attraction VMT by total employment derived from the model. The Home-Based-Work VMT per employee is used to measure the efficiency of VMT generated by work related uses for the project TAZ, under both baseline and Cumulative conditions.

Boundary VMT

Consistent with the City's VMT Guidelines, the project's effect on VMT was evaluated using the boundary method. The boundary method is the total daily VMT within a specific area calculated by multiplying the daily vehicle traffic volume on all the roadway segments by the length of each of the roadway segments within that specific study area. This approach includes all trips, including those trips that do not begin or end in the designated boundary. This method also captures the effect of cut-

¹ SCAQMD High Cube Warehouse Truck Trip Study White Paper Summary of Business Survey Results. South coast Air Quality Management District. June 2014. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/business-survey-summary.pdf>

through and/or displaced traffic within the specific study area.

The VMT impact is determined by normalizing the boundary VMT by the service population and comparing the results between the no project and plus project conditions. The project effect on VMT using the boundary method was evaluated for the countywide boundary.

VMT RESULTS

The following summarizes the results of the project-generated (PA method) VMT and the effect on VMT (Boundary method) modeling. **Table 2** shows the project-generated (PA method) home-based work (HBW) VMT for the Baseline Year (2024) conditions. As shown in **Table 2**, HBW VMT per employee for the project (23.23) is approximately 22% lower than the County average (29.74). Similarly, **Table 3** shows the project-generated home-based and home-based work VMT for Cumulative Year (2050) conditions. As shown in **Table 3**, HBW VMT per employee for the project (23.42) is approximately 21% lower than the County average (29.53).

Table 2 – Baseline Year (2024) Project-Generated VMT

VMT Metric	San Bernardino County	Project
Generated HBW VMT	26,937,842	15,741
Employment	905,832	678
HBW VMT/Employee	29.74	23.23

Note: The current version of the SBTAM Model maintains a base year condition of 2019, which was interpolated to 2024 to be representative of baseline conditions. The Cumulative Year for the SBTAM Model is 2050.

Table 3 – Cumulative Year (2050) Project-Generated VMT

VMT Metric	San Bernardino County	Project
Generated HBW VMT	33,810,918	23,025
Employment	1,144,814	983
HBW VMT/Employee	29.53	23.42

Table 4 shows the Baseline Year (2024) Project effect on VMT for the County using the boundary method. As shown in **Table 4**, County Boundary VMT per service population (22.48) decreases by 0.04% for with project conditions compared to the without project conditions (22.47). Similarly, **Table 5** shows the Cumulative Year (2050) Project effect on VMT for the County. As shown in **Table 5**, the County Boundary VMT per service population (24.59) remains the same for with and without project conditions.

Table 4 – Baseline Year (2024) Project Effect on VMT

VMT Metric	Without Project	With Project
County Boundary VMT	71,731,963	71,729,970
County Service Population	3,191,574	3,191,780
County Boundary VMT/Service Population	22.48	22.47

Note: The current version of the SBTAM Model maintains a base year condition of 2019, which was interpolated to 2024 to be representative of baseline conditions. The Cumulative Year for the SBTAM Model is 2050.

Table 5 – Cumulative Year (2050) Project Effect on VMT

VMT Metric	Without Project	With Project
County Boundary VMT	92,487,700	92,482,797
County Service Population	3,761,254	3,761,254
County Boundary VMT/Service Population	24.59	24.59

VMT IMPACT DETERMINATION

Based on the VMT analysis conducted using the City's VMT Guidelines the following findings are made:

- Project's Baseline (2024) and Cumulative Year (2050) Home-Based-Work (HBW) VMT per employee were both less than the Countywide average and therefore would result **in a less-than-significant impact** considering the project generated VMT impact threshold.
- Project's Baseline (2024) and Cumulative Year (2050) Countywide Boundary VMT per service-population does not increase under the plus project conditions and therefore would result **in a less-than-significant impact** considering the project's effect on VMT impact threshold.

Based on the findings above, it can be concluded that the Project would not have a significant impact.