

Technical Memorandum

February 24, 2025

To: Barbara Heyman, Michael Baker International

From: Jacob Swim TE, Michael Baker International

Subject: Southland Diamond Ranch High School (DRHS) Solar Farm – VMT Screening Assessment

Introduction

The purpose of this memorandum is to document a vehicle mile traveled (VMT) assessment for the proposed installation of a solar farm (Project) in support of the transportation component of the California Environmental Quality Act (CEQA) analysis. Specifically, a VMT screening analysis is documented in this memorandum. The Project proposes the installation and operation of a 2.8 MW DC solar farm. The system would include 4,284 ground-mounted photovoltaic panels that would have a maximum height of 6 feet, 7 inches. The Project includes a maintenance access road along the south side of the tennis courts from Diamond Ranch Drive; a new 12 kV substation south of the arrays, which would face south, toward Diamond Ranch High School (DRHS); underground interconnect cables; fencing; and drainage improvements. The entire Project site would be graded to ensure a level area and that proper drainage is provided. The renewable energy generated by the Project would offset electricity used by the District. Project implementation would not impact student enrollment at the school.

Table 1 provides key Project information. **Exhibit 1** shows the location of the Project and **Exhibit 2** shows the conceptual site plan.

Table 1 – Project Information Summary

Item	Description
Project Title	Southland Diamond Ranch High School Solar Farm
Project Location	The Project is proposed at the northern portion of DRHS at 100 Diamond Ranch Road in the City of Pomona, California.
Surrounding Uses	The Project site is surrounded by Pomona Freeway (I-60) to the north, existing school facilities to the south, undeveloped natural vegetation to the east and west.
Existing Use	The Project Site is on vacant land that is sloped.

Proposed Use	The Project consists of the installation and operation of a 2.8 MW DC solar farm. The system would include 4,284 ground-mounted photovoltaic panels that would have a maximum height of 6 feet, 7 inches.
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Proposed Operation & Trip Generation

The Project includes a maintenance access road along the south side of the tennis courts from Diamond Ranch Drive. Maintenance of the solar farm is anticipated to occur intermittently (once or twice a month) and therefore, vehicular traffic generated by the solar farm operations on a weekly basis would be nominal. In addition, maintenance to the solar farm would most likely be scheduled to occur off-peak to avoid student pick-up and drop-off time periods.

VMT Assessment Guidelines & Methodology

The primary resource for this VMT screening assessment is the *City of Pomona Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment*¹ dated October 2020 (City Guidelines). As outlined in the City Guidelines, certain projects, because of their size, nature, or location, are exempt from the requirements of preparing a detailed VMT analysis. The City has developed an approach to identified transportation impacts under CEQA for land-use projects that aligns with guidance provided in the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA (2018)*². The City Guidelines provides screening criteria to determine if a development project is presumed to have a less-than-significant transportation impact.

Screening Criteria

Each of the screening criteria outlined in the City Guidelines were evaluated for the proposed Project and the results are summarized in **Table 2**. As shown, the Project meets the screening criteria based on the “Low VMT Areas Screening” and the “Project Type Screening” criterion identified below. Therefore, a detailed VMT analysis is **NOT** required, and the Project is presumed to have a less-than-significant transportation impact on the environment.

Table 2 – VMT Screening Criteria Summary

Screening Criteria		Project Evaluation	Result
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. This presumption may NOT be appropriate if the project: <ol style="list-style-type: none"> 1. Has a Floor Area Ratio (FAR) of less than 0.75; 2. Includes more parking for use by residents, customers, or employees of the project than required by the City; 3. Is inconsistent with the applicable Sustainable Communities Strategy; or 4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units. 	The Project is not located within a TPA according to the San Gabriel Valley Council of Government (GVCOG) VMT Evaluation Tool and online mapping system. Refer to Exhibit 3 .	Screening Criteria Is Not Met

Table 2 – VMT Screening Criteria Summary

Screening Criteria	Project Evaluation	Result
<p>Low VMT Area Screening</p>	<p>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.</p>	<p>The Project is a solar farm and does not fit the characteristics of a residential, office, or industrial project. This criterion does not apply.</p>
<p>Project Type Screening</p>	<p>Some project types have been identified as having the presumption of a less than significant impact. The following uses can be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are local serving in nature:</p> <ul style="list-style-type: none"> • Local-serving K-12 schools • Local parks • Day care centers • Local-serving retail uses less than 50,000 square feet, including: <ul style="list-style-type: none"> ○ Gas stations ○ Banks ○ Restaurants ○ Shopping Centers • Local-serving hotels (e.g. non-destination hotels) • Local-serving assembly uses (places of worship, community organizations) • Community institutions (public libraries, fire stations, local government) • Affordable, supportive, or transitional housing • Assisted living facilities • Senior housing (as defined by HUD) • Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS • Student housing projects on or adjacent to a college campus 	<p>The solar farm is part of the Diamond Ranch High School which is a local-serving land use in this screening criteria i.e. Local-serving K-12 school.</p> <p>In addition, the Project is expected to generate far less than 110 daily vehicle trips. Therefore, this criterion is satisfied.</p>

Table 2 – VMT Screening Criteria Summary

Screening Criteria	Project Evaluation	Result
	<ul style="list-style-type: none"> • Other local-serving uses as approved by the City Traffic Engineer, including: <ul style="list-style-type: none"> ○ Local medical services, such as dental, optometry, etc. ○ Insurance agencies ○ Travel agencies ○ Tax accountants ○ Small appliance repair ○ Other personal services (e.g. hair salons, gyms, laundromats, dry cleaners, tailors) • Projects generating less than 110 daily vehicle trips <ul style="list-style-type: none"> ○ This generally corresponds to the following “typical” development potentials: <ul style="list-style-type: none"> • 11 single family housing units • 16 multi-family, condominiums, or townhouse housing units • 10,000 sq. ft. of office • 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 	

Source: City of Pomona Transportation Study Guidelines, October 2020

Conclusion

The VMT evaluation of the Project finds the Project meets the screening criteria under “Project Type Screening” as outlined in the City’s Guidelines. **Therefore, the Project is presumed to result in a less-than-significant transportation impact under CEQA, and a detailed VMT analysis is not required.**

References

1. *City of Pomona Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment*. October 2020.
2. Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. State of California. December 2018.

EXHIBIT 1 – PROJECT LOCATION MAP

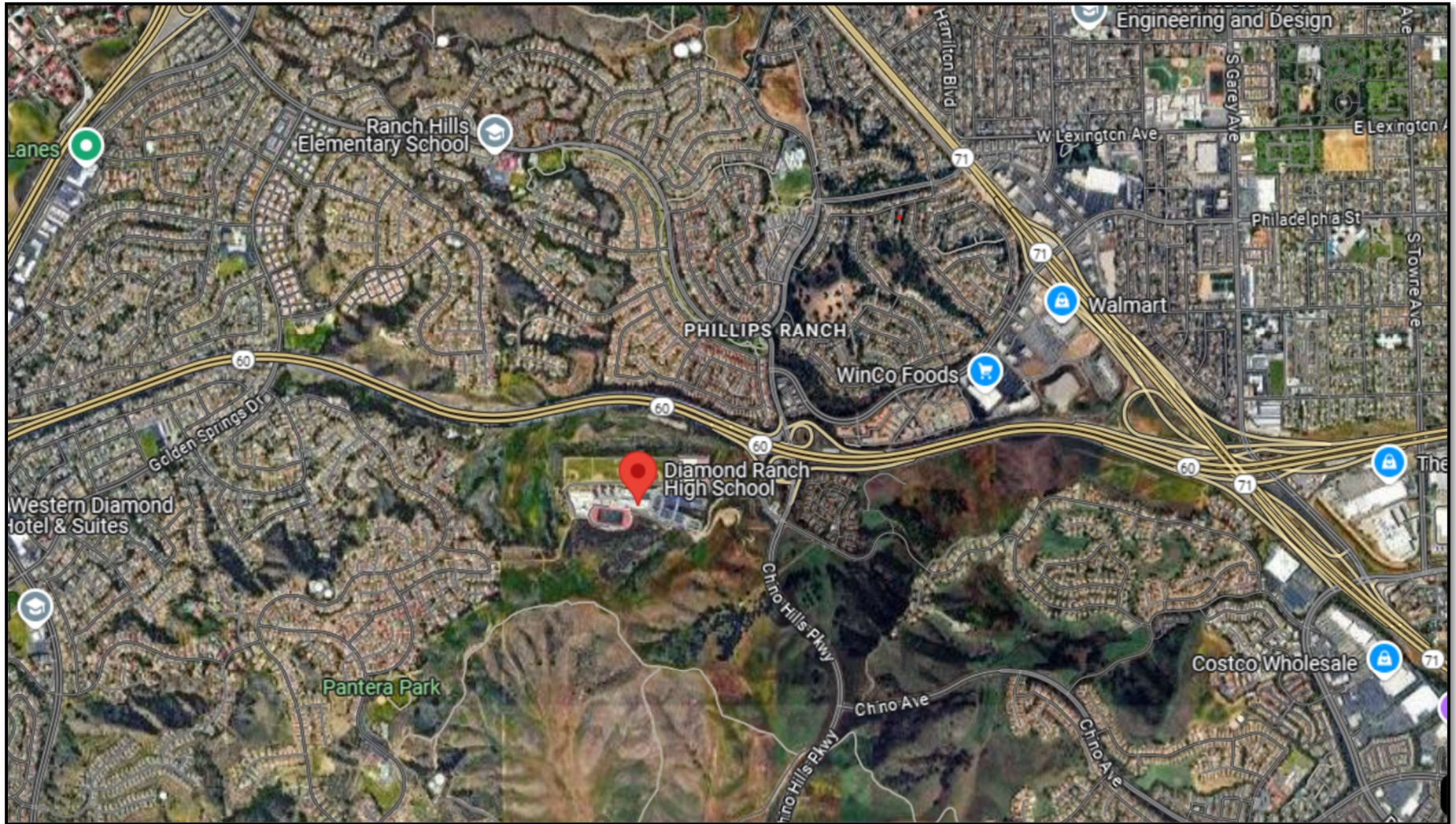



EXHIBIT 2 – PROJECT SITE PLAN




EXHIBIT 3 – SGVCOG VMT EVALUATION TOOL – TPA AREA





SGVCOG VMT Evaluation Tool

[USER AGREEMENT](#)
[REPORT A PROBLEM/FEEDBACK](#)

For multiple APNs, type in one at a time, press enter, and repeat this process for each new APN. Each entry will be added to your project location (maximum 25 parcels).


Add


Remove


Clear Selection

OR

Type in APN # and click to select 🔍

APN: 8701-022-907 selected

Enrich Map with Layers
Turn layers on and off and adjust visibility to aid in project parcel selection.

<input checked="" type="checkbox"/> Parcels (Zoom to view)	100%	+
<input checked="" type="checkbox"/> TAZs (Zoom to view)	74%	+
<input checked="" type="checkbox"/> TPA	50%	+
<input checked="" type="checkbox"/> Jurisdiction Boundaries	100%	+
<input checked="" type="checkbox"/> Project Area	100%	+

CONTINUE

