

TECHNICAL MEMORANDUM

DATE: April 14, 2026
TO: Sonny Dhillon, United Truck Parking, LLC
FROM: Alex So, Urban Crossroads, Inc.
JOB NO: 17016-01 VMT.docx

SUBJECT: DHILLON INDUSTRIAL YARD (PAR25-10) VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION

Urban Crossroads, Inc. has completed the following Vehicle Miles Traveled (VMT) Screening Evaluation for the Dhillon Industrial Yard (PAR25-10) (Project) located on the southwest corner of Hibiscus Road and Mesa Linda Road in the City of Adelanto (Assessor's Parcel Numbers 0459-451-31 through 34).

PROJECT OVERVIEW

The proposed Project consists of a secure outdoor storage facility intended for commercial trucks, trailers, and shipping containers. The Project is designed to support local and regional transportation, logistics, and industrial-related businesses by providing a safe, organized, and professionally managed storage environment. The hours of operation will be from 7 AM to 4 PM, 7 days a week. There will be two full-time employees on site during the hours of 7 AM to 4 PM. Most of the trucks will be stationary for a few days before leaving or coming in again. A site plan is included in Attachment A.

BACKGROUND

The California Environmental Quality Act (CEQA) requires all lead agencies to adopt VMT as the measure for identifying transportation impacts for land use projects. To comply with CEQA, the City of Adelanto adopted their Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (City Guidelines) (1). This VMT screening evaluation has been developed based on the adopted City Guidelines.

VMT SCREENING

City Guidelines state that a project may be determined to have a less than significant VMT impact and screened out of requiring a project-level VMT analysis if it meets at least one of the City's VMT screening criteria. To aid in the screening process for criteria that utilize map-based information, and consistent with thresholds identified in the City Guidelines, the San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool (**Screening Tool**) was used. The City's adopted VMT screening criteria considered for the Project are listed below:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening

- Step 3: Local Serving Project Type Screening

STEP 1: TPA SCREENING

Consistent with guidance identified in the City Guidelines, 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.

As seen in the Screening Tool Results in Attachment B, the Project is not located in a TPA.

TPA screening step is not met.

STEP 2: LOW VMT AREA SCREENING

City Guidelines state that projects located within a low VMT-generating area may be presumed to have a less than significant VMT impact absent substantial evidence to the contrary. City Guidelines identify a low VMT area as an individual traffic analysis zone (TAZ) where VMT per service population is 15% below the County of San Bernardino average total daily VMT per service population

The latest SBTAM+ model was used to determine the VMT per service population for the Project TAZ. The Project site was identified within SBTAM+ and is located in TAZ 53909201. To calculate the 2026 baseline VMT per service population, existing data from the base year and cumulative year SBTAM+ models were extracted, and straight-line interpolation was applied. Table 1 presents the VMT, service population, and VMT per service population for both the Project and the City's threshold.

TABLE 1: VMT PER SERVICE POPULATION

	Baseline TAZ 53909201	Existing Countywide Average
VMT	68,992	161,657,528
Service Population	794	3,235,381
VMT per Service Population	85.0	39.2

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.”).

TAZ 53909201 generates 85.0 VMT per service population, which exceeds the City's significance threshold of 39.2 VMT per service population. Therefore, the Project is not located in a low VMT area.

Low VMT Area screening step is not met.

STEP 3: LOCAL SERVING PROJECT TYPE SCREENING

Projects that generate fewer than 110 daily vehicle trips are deemed to not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT. Substantial evidence in support of this daily trip threshold is documented in the City Guidelines³.

As identified in the Project's Dhillon Industrial Yard (PAR25-10) Trip Generation Assessment (Urban Crossroads, April 2026), the Project is estimated to generate 218 average daily two-way trips (ADT), which exceeds the 110 ADT threshold set forth by the City Guidelines.

The City Guidelines also state that local-serving retail uses with buildings less than 50,000 square feet are presumed to have a less-than-significant VMT impact. In addition to local-serving retail, the Guidelines identify other uses that may also be presumed to have a less-than-significant VMT impact absent substantial evidence to the contrary because they are local serving in nature, including local-serving K-12 schools, local parks, day care centers, local-serving gas stations, local-serving banks, local-serving hotels, student housing projects on or adjacent to college campuses, local-serving assembly uses, community institutions, local-serving community colleges, affordable or supportive housing, assisted living facilities, and senior housing.

Although the Project is not specifically identified in that list, it is reasonably characterized as local serving in function because it is intended to support nearby warehouses and industrial businesses by providing secure storage for trucks, trailers, and shipping containers within the same general industrial area. Such facilities are typically used in proximity to their primary area of operation because longer trips to remote storage locations increase operating costs and result in inefficient, non-productive travel associated with retrieving, staging, and returning equipment. By providing a proximate storage option for nearby industrial users, the Project would help reduce unnecessary local repositioning trips and support the operational efficiency of existing industrial uses in the area, rather than create a new regional destination or substantial new travel demand.

Local Serving Project Type screening step is met.

CONCLUSION

Based on the screening evaluation, the Project does not meet the Transit Priority Area screening criterion or the low-VMT-area screening criterion. However, the Project is reasonably characterized as a local-serving project type for the reasons discussed above and therefore meets Step 3: Local-Serving Project Type Screening. Accordingly, the Project would result in a less than significant VMT impact, and no further VMT analysis is required.

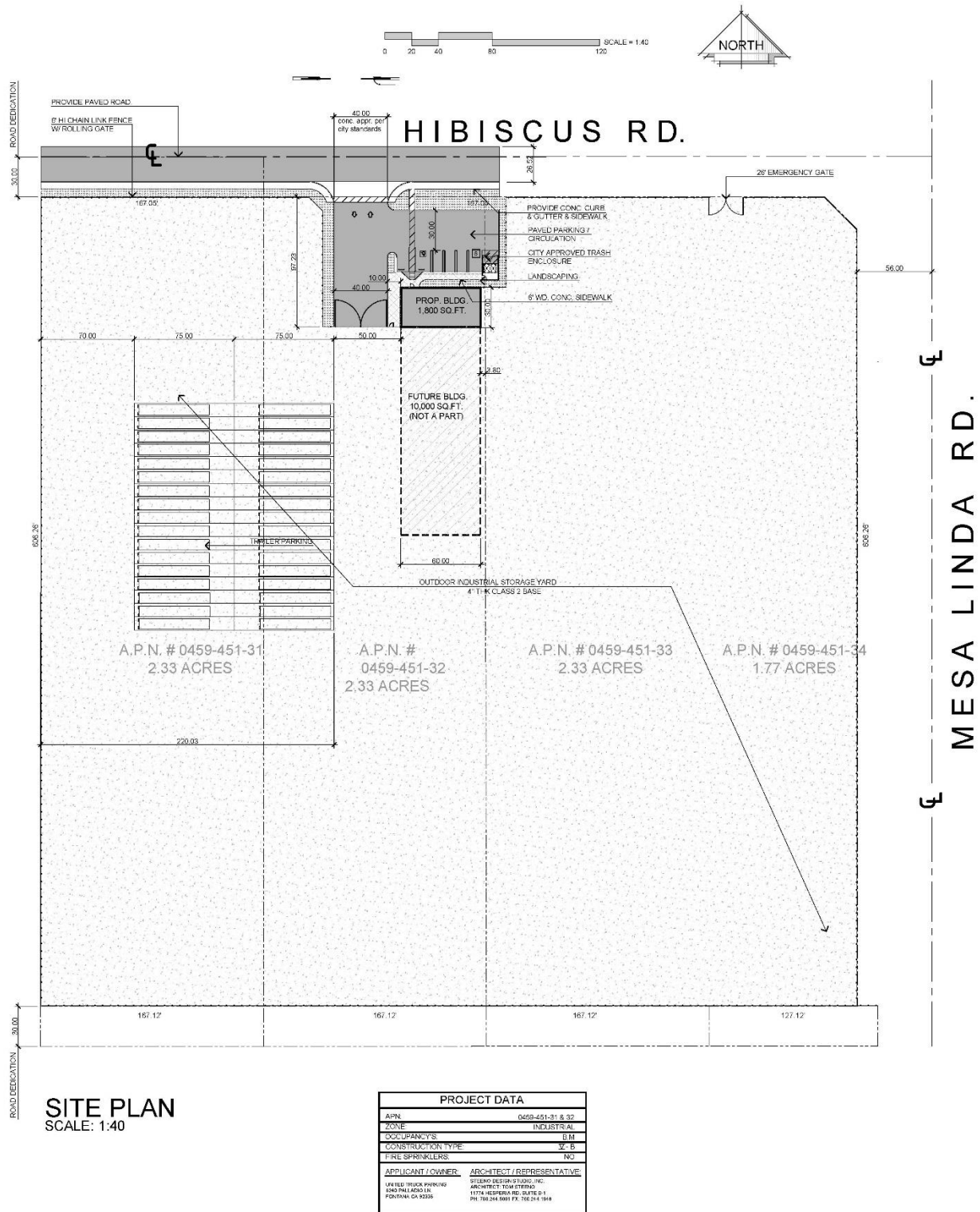
If you have any questions, please contact me directly at aso@urbanxroads.com.

³ City Guidelines; Appendix B.

REFERENCES

1. **City of Adelanto.** *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment.* July 2020.

ATTACHMENT A: PROJECT SITE PLAN



ATTACHMENT B: SBCTA SCREENING TOOL RESULTS

