
APPENDIX K

VEHICLE MILES TRAVELED ANALYSIS MEMORANDUM

MEMORANDUM

DATE: February 4, 2025

To: Sean Reilly, Principal Planner, City of Redlands

FROM: Ambarish Mukherjee, P.E., AICP; Principal, LSA Associates

SUBJECT: 913 California Street Project Vehicle Miles Traveled Analysis Memorandum (LSA Project No. 20242064)

LSA has prepared this Vehicle Miles Traveled (VMT) Analysis Screening Memorandum (Memo) for the proposed 913 California Street Project (project) in Redlands, California. The proposed project includes the construction of a four story, 55,186 square foot (sf) business hotel containing 90 rooms, a 1,450-sf coffee shop, a 3,588 sf express style car wash, and associated parking on a 5.1-acre property at 913 California Street in Redlands, California (Assessor’s Parcel Numbers [APN] 292-034-10 and -17). The project site currently consists of two undeveloped parcels and is bounded by a flood control channel (Mission Channel) along the southwestern boundary, California Street to the east, and the Metrolink Arrow Route railroad line to the north. The City of Loma Linda is directly southwest of the project site.

Figure 1 illustrates the project site’s location within the region. Figure 2 illustrates a conceptual site plan of the project. The project land uses are consistent with the City’s General Plan land use and zoning designation.

The objective of this Memo is to determine whether the project is eligible to be screened out from a detailed VMT Analysis pursuant to California Environmental Quality Act (CEQA).

BACKGROUND

On December 28, 2018, the California Office of Administrative Law cleared the revised CEQA guidelines for use. Among the changes to the guidelines was removal of vehicle delay and level of service from consideration under CEQA. With the adopted CEQA guidelines, transportation impacts are to be evaluated based on the VMT generated by a project.

The City follows the *City of Redlands CEQA Assessment VMT Analysis Guidelines* (VMT Guidelines) for CEQA VMT evaluation purposes. The City’s VMT Guidelines include screening criteria, significance thresholds, requirements, recommended methodologies, and procedures for VMT analysis for projects within the City.

PROJECT SCREENING DETERMINATION

The first step for preparing a VMT analysis is to evaluate the land use type for the project. The second step is to evaluate whether a project is eligible to be screened out from preparing a detailed

VMT analysis. The City's VMT Guidelines provide three screening criteria for land use projects. These three criteria were reviewed to examine if the proposed project can be screened out from a detailed VMT analysis. Following is a brief description of project screening criteria that is applicable to the proposed project and whether the proposed project will be eligible to be screened out:

- **Transit Priority Area Screening:** Based on the City's VMT Guidelines, projects located within a transit priority area (TPA) may be presumed to have a less than significant impact if they also meet the floor area ratio (FAR), parking, and sustainable communities' strategy requirement criteria recommended in the City's VMT Guidelines. The project site's location was examined using the San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool to determine whether the project would be located within a TPA. Based on the SBCTA VMT Screening Tool, the project site is not located within a TPA. Therefore, the project cannot be screened out using this criterion.
- **Low VMT Area Screening:** Based on the City's VMT Guidelines, residential and office projects, as well as certain employment-related and mixed-use projects located within a low-VMT-generating area may be presumed to have a less than significant impact, absent substantial evidence to the contrary. The project does not consist of residential or office uses. However, since the City's VMT Guidelines also allows the application of this criterion for mixed-use or employment generating projects, the project site's location was examined using the SBCTA VMT Screening Tool to determine whether the project would be located within a low VMT area. Based on the SBCTA VMT Screening Tool evaluation, the project site is not located in a low VMT generating area and cannot be screened out using this criterion.
- **Project Type Screening:** Based on the City's VMT Guidelines, local serving retail projects with store areas below 50,000 sf may be presumed to have a less than significant impact absent substantial evidence to the contrary. Additionally, based on the City's VMT Guidelines, certain local-serving types of projects, including local serving gas station, K-12 schools, parks, day care centers, banks, non-destination hotels, and community institutions are presumed to have a less than significant VMT impact.

As previously noted, the project includes one 1,450 sf coffee shop, and a 3,588-sf express style car wash, and one 90-room business hotel. As such, based on the project description, both the restaurant and the car-wash component would have a store area less than the 50,000-sf threshold and would serve local patrons. Therefore, these components of the project could be considered small local-serving retail uses and are eligible to be screened out using this criterion.

Similarly, given the project site's location adjacent to multiple existing and recently developed employment-based land uses (business parks, industrial parks, and the ESRI campus), and because the hotel would not offer any conference space or resort-style amenities, the business hotel component of the project is not anticipated to function as a destination hotel. This is because the hotel is not anticipated to attract new visitor trips to the City on its own. Instead, the hotel would provide visitors to the City with a new hotel option close to these employment areas that do not currently have adequate hotel rooms available for such business patrons, thereby resulting in a potential reduction in visitor VMT once the project is constructed as it would allow some visitors to stay closer to their destinations. Therefore, as a non-destination hotel, this component of the project is also eligible to be screened out using this criterion.

ACTIVE TRANSPORTATION AND PUBLIC TRANSIT ANALYSIS

According to the City's VMT Guidelines, a significant impact occurs when a project conflicts with adopted plans, policies, or programs regarding active transportation or public transit facilities, or otherwise decreases the performance or safety of such facilities.

Within the project vicinity, paved sidewalks are present on the east side of California Street as well as the west side of the street between the gas station north of the project site and I-10. Sidewalks are also present on both sides of Redlands Boulevard west of California Street and on the north side of Redlands Boulevard east of California Street. The project would add sidewalks along the project frontage as part of the project frontage development and enhance sidewalk connectivity along California Street. As such, the project would increase the performance or safety of the existing pedestrian facilities.

Currently, there are no existing bicycle facilities adjacent to the project site. However, based on the City's General Plan Circulation Element, both California Street and Redlands Boulevard are proposed bike routes. The project would not conflict with any plans and policies related to bike facilities or decrease the performance or safety of any existing or proposed bicycle facilities.

Omnitrans is the public transit agency serving the San Bernardino Valley, providing safe, reliable, affordable, friendly, and environmentally responsible transportation. Omnitrans Route 8 serves the project vicinity along Redlands Boulevard. Though the project site is adjacent to Metrolink's Arrow Route commuter rail line, there are no existing or proposed stops within the vicinity of the project site. However, none of these transit facilities would be affected by the project. As such, the project is not anticipated to decrease the performance or safety of any existing or proposed public transit facilities.

The project would not conflict with existing or proposed bicycle, pedestrian, and public transit facilities. Therefore, it can be considered to conform to all adopted policies, plans, or programs concerning these facilities and would not have a significant impact.

CONCLUSION

Based on the City's VMT Guidelines, the proposed project's land use components are presumed to have a less than significant impact, and therefore are eligible to be screened out. As such, the entire project is anticipated to have a less than significant VMT impact and therefore, is eligible to be screened out from further analysis.

Should you have any questions, please do not hesitate to contact me at (951) 781-9310 or email me at Ambarish.Mukherjee@lsa.net.

Sincerely,

LSA Associates, Inc.

Ambarish Mukherjee, P.E., AICP; Principal

ATTACHMENTS

Figure 1: Regional and Project Location

Figure 2: Conceptual Site Plan

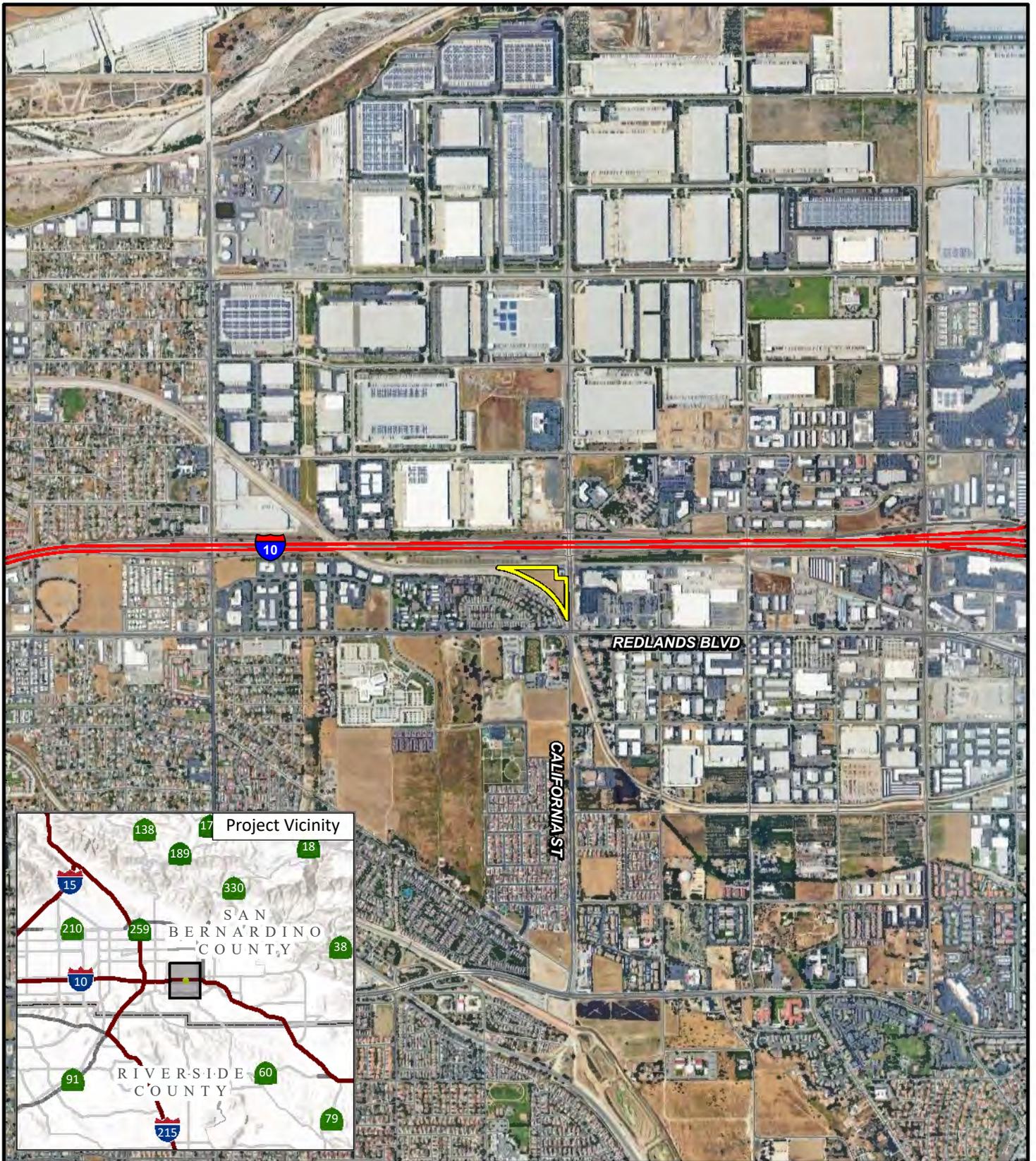
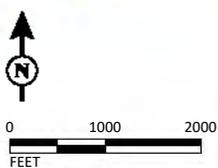


FIGURE 1

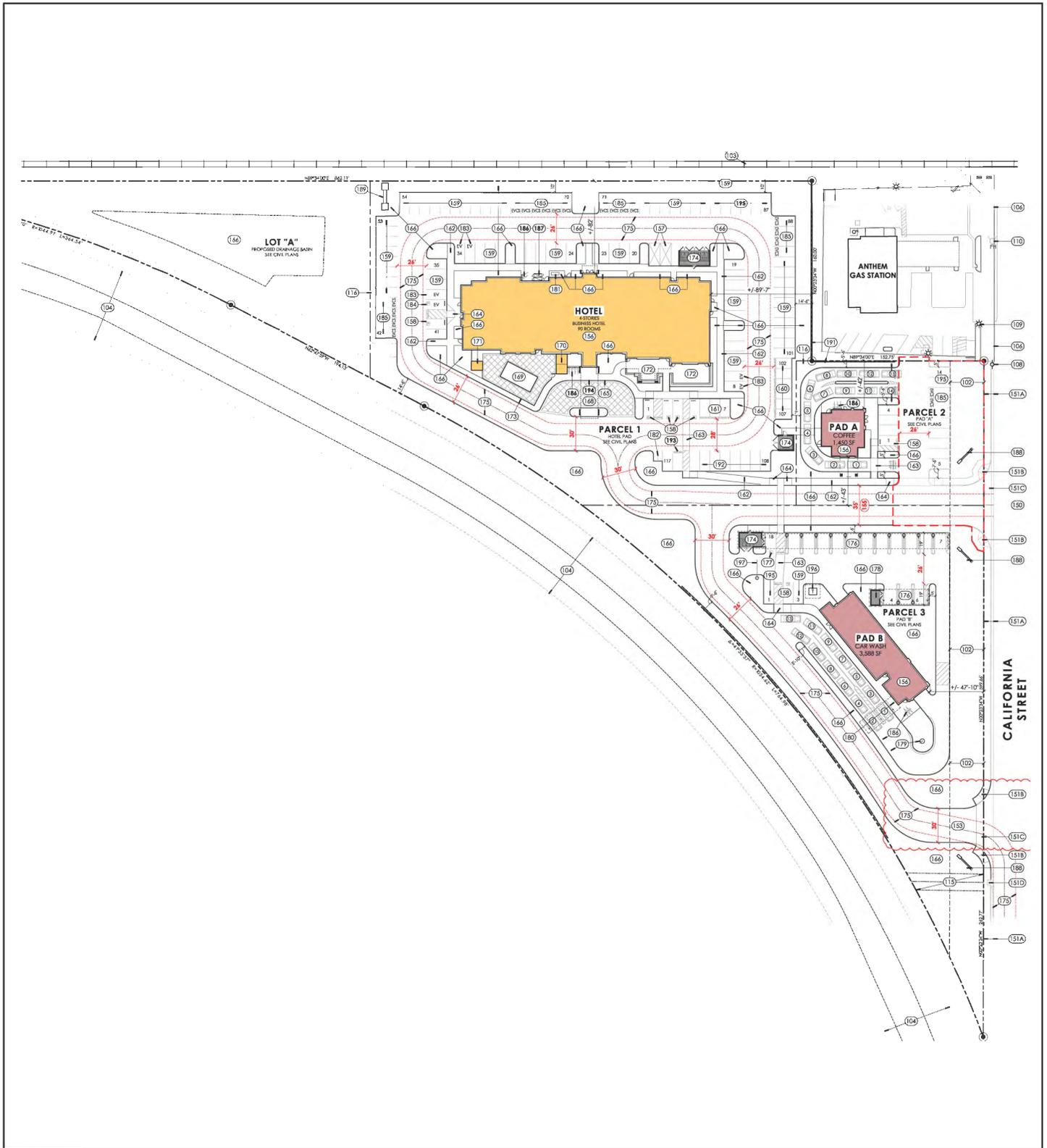
LSA

LEGEND
 Project Site



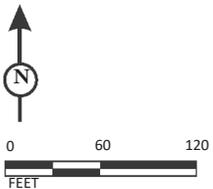
SOURCE: Google Earth Imagery, 2024

913 California Street Project
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 Regional Location and Project Vicinity



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FIGURE 2



913 California Street Project
 Vehicle Miles Traveled Analysis Memorandum

Conceptual Site Plan