

DATE: February 9, 2023
TO: Charles Holcombe, Rincon Consultants, Inc.
FROM: Alex So, Urban Crossroads, Inc.
JOB NO: 14943-02

AMKO RECYCLING FACILITY VEHICLE MILES TRAVELED (VMT) ANALYSIS

Urban Crossroads, Inc. is pleased to provide the following Vehicle Miles Traveled (VMT) Analysis for the AMKO Recycling Facility (**Project**), which is located at the northwest corner of N. Pennsylvania Avenue and J Street (APN:0162-134-12, 23 & 24) in the City of Colton.

PROJECT OVERVIEW

The proposed Project would include constructing a new building in order to relocate AMKO's buy-back center, which serves the public from the west side of Pennsylvania Avenue, while maintaining the larger services for commercial customers at the existing facility on the east side of Pennsylvania Avenue. The proposed Project consists of 7,670 square feet of warehousing/storage space (SF), 2,016 square feet of retail space, and a 428 square foot office (total of 10,114 square feet).

The existing site will be rehabilitated to incorporate new architectural elements and add new landscaping along Pennsylvania Avenue and Valley Boulevard to improve the streetscape. The main warehouse will also be improved to add a 12,545 SF enclosed storage space, which would enclose 80% of the current recycling operations and contain control of various materials to maximize efficiency and safety. This addition will improve the visual appearance from the adjacent I-10 Freeway. The existing warehouse building located at 157 N. Pennsylvania Avenue, north of the adjacent alley, is proposed to remain and no changes are proposed. A preliminary site plan for the Project is shown 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. [City of Colton VMT \(Vehicle Miles Traveled\) Guidelines \(June 2020\) \(City Guidelines\)](#) (1), The VMT analysis presented in this report has been developed based on the adopted City Guidelines.

VMT SCREENING

The City Guidelines describe specific “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 project level VMT analysis. For the purposes of this analysis, the initial VMT screening process has been conducted with the SBCTA VMT Screening Tool (**Screening Tool**), which uses screening criteria consistent with the screening thresholds recommended in the City Guidelines. The following screening criteria are described within the City Guidelines:

- Trip Screening
- Land Use Type Screening
- High Quality Transit Areas (HQTA) Screening
- Low VMT Area Screening

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

TRIP SCREENING

City Guidelines states projects that generate less than or equal to 110 daily vehicle trips may be presumed to have a less than significant impact on VMT.¹ The Project is anticipated to generate 134 daily vehicle trips (see Attachment C) and, therefore, would exceed the City’s 110 daily vehicle trip threshold.

Trip Screening criteria is not met.

LAND USE TYPE SCREENING

City Guidelines identifies local serving retail projects less than 50,000 square feet or other local serving uses (e.g., day care centers, student housing, public facilities, places of worship, etc.) may be presumed to have a less than significant impact absent substantial evidence to the contrary. The Project does not intend to include any local serving uses.

Land Use Type Screening criteria is not met.

HIGH QUALITY TRANSIT AREAS (HQTA) SCREENING

Consistent with the City Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing “major transit stop”² or an existing stop along a “high-quality transit corridor”³) may be presumed to have a less than significant impact absent substantial evidence to the contrary.

¹ City Guidelines; Page 17

² 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.”).

³ 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.”).

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.

The Project site is located within a TPA, however, does not meet the secondary criteria such as having a FAR above 0.75. (See Attachment B).

TPA screening criteria is not met.

LOW VMT AREA SCREENING

As noted in the City Guidelines, “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.” The Screening Tool uses the sub-regional San Bernardino County Transportation Analysis Model (SBTAM) to measure VMT performance within San Bernardino County for individual traffic analysis zones (TAZ’s) within each city. The parcel containing the proposed Project was located and the screening tool was run for Production-Attraction (PA) VMT per worker. The Project TAZ 53765202 was found to have a VMT per worker of 15.3 as compared to the threshold of 15% below the City of Colton’s average from the 2016 Baseline of 23.30⁴ or 19.8 VMT per worker. Based on the Screening Tool results, the Project is located within a low VMT generating zone. (See Attachment B).

Low VMT Area screening criteria is met.

⁴ City Guidelines; page 18.

CONCLUSION

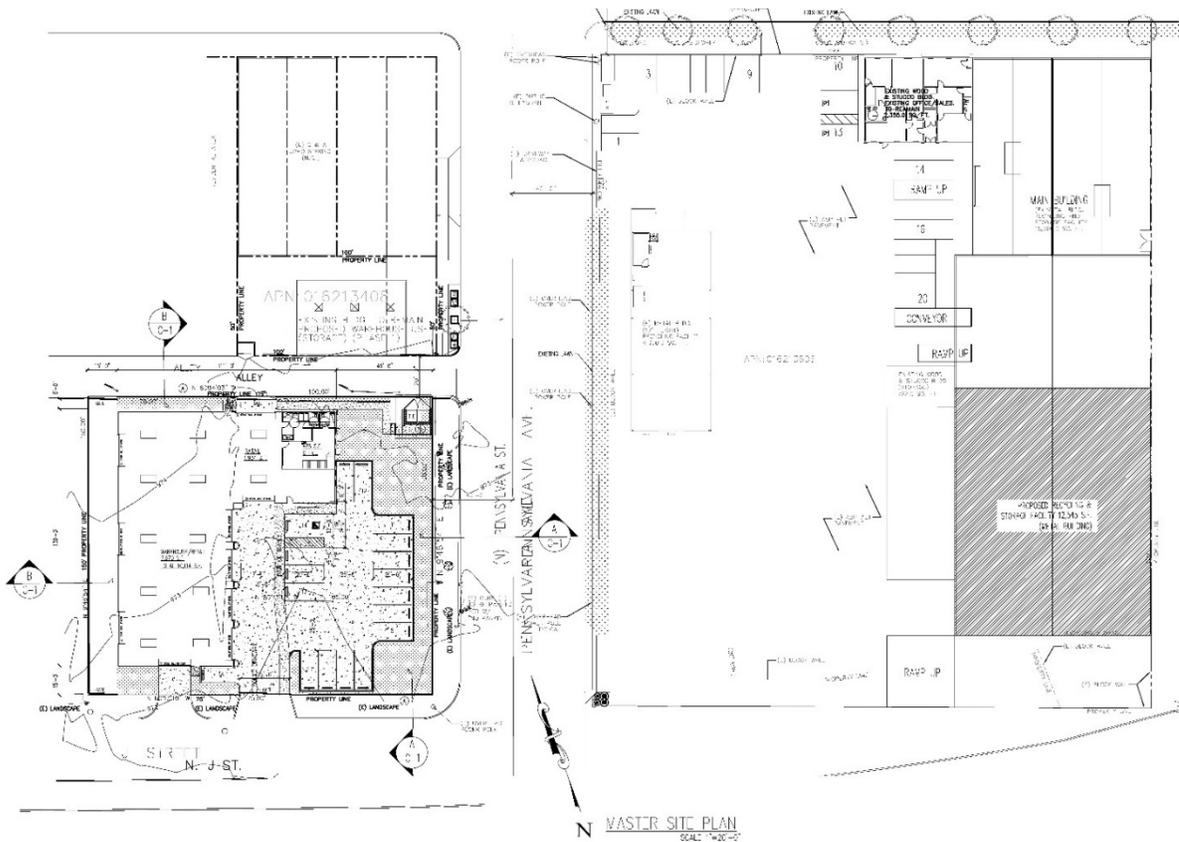
In summary, the Project was evaluated consistent with the available screening criteria. The Project was found to meet the Low VMT Area Screening criteria, therefore, no further VMT analysis is required.

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

REFERENCES

1. **City of Colton.** *City of Colton VMT (Vehicles Miles Traveled) Guidelines.* City of Colton : s.n., June 2020.

**ATTACHEMENT A
PRELIMINARY SITE PLAN**



ATTACHMENT B
SBCTA SCREENING TOOL RESULTS

SBCTA VMT Screening Tool Powered by Fehr & Peers User's Guide

157 Pennsylvania Ave, Colton, C X

Show search results for 157 Pennsylv...

Complete #1 - 4, Then Click 'Run'

VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*

PA VMT Per Worker

#3. Select the Baseline Year. The years available for analysis are from 2016 to 2040.*

2023

#4. Select the Threshold (% reduction from baseline year). Note each jurisdiction may have adopted a different metric by which they measure VMT. Please consult with the jurisdiction to verify which metric to use for your analysis.*

Below City Baseline (-15%)

[Help](#) **Run**

Project Area VMT (2 of 2)

Assessor Parcel Number (APN)	016213423
Traffic Analysis Zone (TAZ)	53765202
TAZ VMT	15.3
Jurisdiction VMT	17.9
% Difference	-14.71%
VMT Metric	PA VMT Per Worker
Threshold	15.2

[Zoom to](#) ...

Map Layers

- Project Area VMT
- Screening Results
- Low VMT Generating TAZs
- Parcels
- Jurisdiction Boundaries
- TAZ
- Transit Priority Area

ATTACHMENT C
TRIP GENERATION DATA

C-1: TRIP GENERATION RATES

Land Use	Units ²	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Actual Vehicle Trip Generation Rates								
Recycling Facility ¹	TSF	0.558	0.446	1.004	0.278	0.502	0.780	12.929
Passenger Cars		0.446	0.223	0.669	0.167	0.446	0.613	8.415
2-Axle Trucks		0.056	0.056	0.112	0.000	0.000	0.000	1.337
3-Axle Trucks		0.000	0.111	0.111	0.111	0.056	0.167	1.505
4+-Axle Trucks		0.056	0.056	0.112	0.000	0.000	0.000	1.672

¹ Trip Generation & Vehicle Mix Source: Empirical data collected at the existing facility located at 340 W. Valley Boulevard.

Average trip generation shown on Table 1 divided the by the existing square footage of 17,945 SF (warehousing storage + office space).

² TSF = thousand square feet

C-2: PROJECT TRIP GENERATION SUMMARY

Land Use	Quantity Units ¹	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Actual Vehicles:								
Recycling Center Expansion ²	10.114 TSF							
Passenger Cars:		5	2	7	2	5	7	86
2-axle Trucks:		1	1	2	0	0	0	14
3-axle Trucks:		0	1	1	1	1	2	16
4+-axle Trucks:		1	1	2	0	0	0	18
Total Truck Trips (Actual Vehicles):		2	3	5	1	1	2	48
Total Trips (Actual Vehicles)³		7	5	12	3	6	9	134

¹ TSF = thousand square feet

² The Project square footage does not include the new 12,545 SF storage building proposed on the existing site as it would enclose 80% of the current recycling operations and contain control of various materials to maximize efficiency and safety (no changes to existing operations).

³ Total Trips = Passenger Cars + Truck Trips.