

# San Bernardino County Behavioral Health Comprehensive Treatment Campus Vehicle Miles Traveled Screening Assessment



**APPROVED**  
CITY OF VICTORVILLE  
ENGINEERING DEPARTMENT

12/05/2024

***Prepared for:***

County of San Bernardino

***Prepared by:***



**INTEGRATED ENGINEERING GROUP**  
TRANSPORTATION PLANNING AND ENGINEERING

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## 1.0 PROJECT INTRODUCTION

The purpose of this report is to evaluate the San Bernardino County Behavioral Health Comprehensive Treatment Campus Project's VMT analysis requirements and compliance with Senate Bill 743 (SB 743) and the California Environmental Quality Act (CEQA).

### 1.1 PROJECT DESCRIPTION

The Project is located at 13333 Palmdale Road, southeast of the intersection of Palmdale Road and Cobalt Road within the City of Victorville, California. The Project is proposing the expansion of St. John of God Health Care Services with new treatment facilities and transitional housing under the following programs:

- Behavioral Health Continuum Infrastructure Program (BHCIP) – 86 total beds
  - 32 beds in the Adult Substance Use Disorder (SUD) Residential Treatment Building
  - 24 beds in the Adult Withdrawal Management Building
  - 16 beds in the Adolescent SUD Residential Treatment Building
  - 14 beds in the Adolescent Psychiatric Residential Treatment Facility
- Community Care Expansion (CCE) Program – 52 total beds among 3 Recovery Residential buildings

Access to the Project site will be provided via two (2) proposed driveways along Cobalt Road.

Figure 1-1 shows the Project site plan.

### 1.2 SENATE BILL 743

On September 27, 2013, SB 743 was signed into State law and started a process intended to fundamentally change transportation impact analysis as part of the CEQA compliance. The California Natural Resource Agency updated the CEQA transportation analysis guidelines in 2018. In this update automobile delay and LOS metrics are no longer to be used in determining transportation impacts. Instead VMT metrics will serve as the basis in determining impacts. Furthermore, the guidelines stated that after July 1, 2020, transportation analysis under CEQA must use VMT to determine impacts for land use projects.

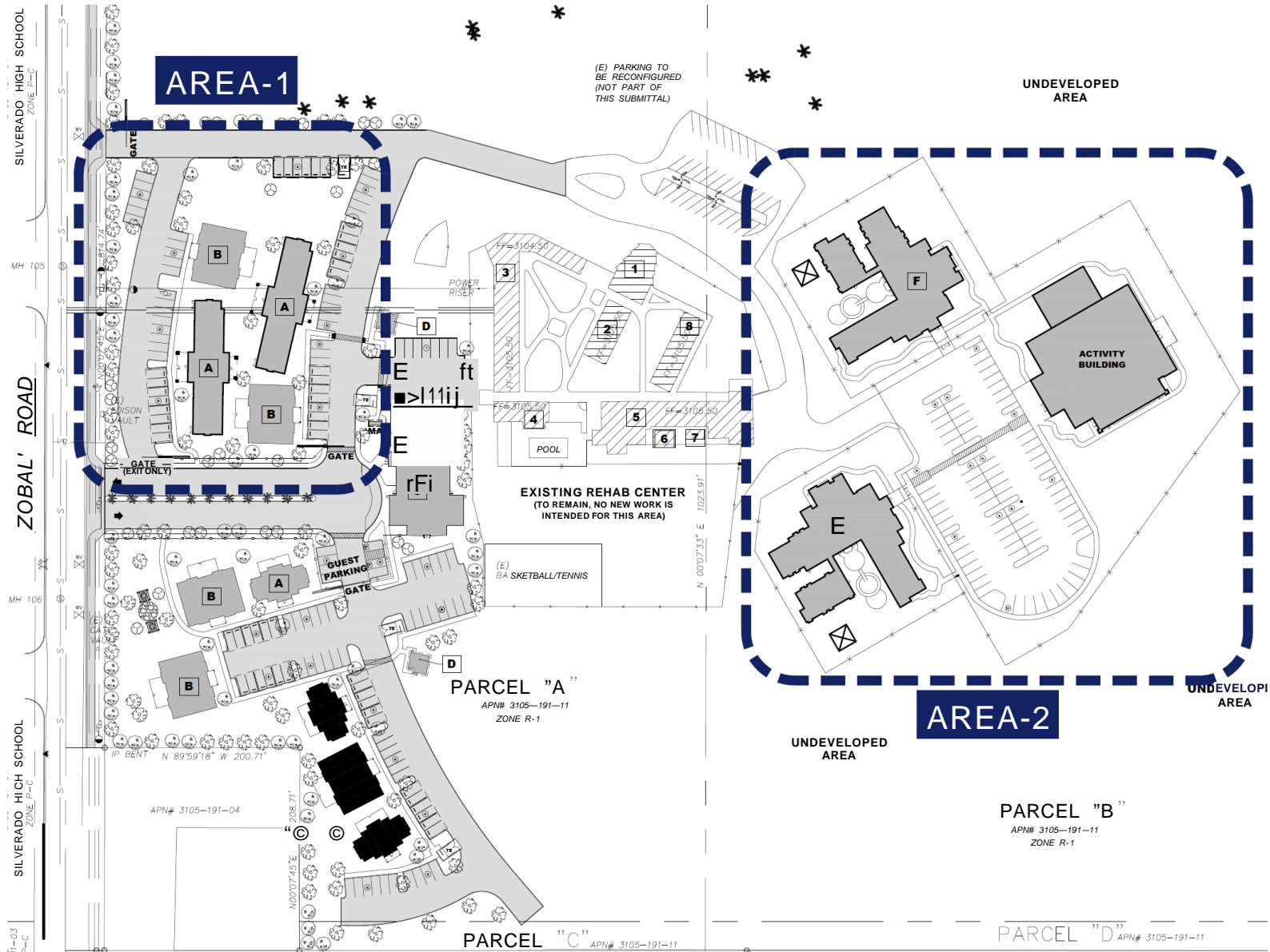
### 1.3 GUIDANCE DOCUMENTS

The City of Victorville has adopted guidance on evaluating VMT for transportation impacts under CEQA through Resolution No. 20-031. Therefore, Exhibit 1 City of Victorville *Vehicle Miles Traveled Analysis Guidelines*, June 2020<sup>1</sup>, hereafter referred to as "Guidelines", will be used for this analysis.

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<sup>1</sup> [https://files.ceganet.opr.ca.gov/254048-4/attachment/DP7ry4Y7vaT3ho2VpMk5yvE2jAcHEhp\\_P64HxaRXcUkzcMPnXFg7jZjNI7CRuyBlbuLFnhY-ovnka4zY0](https://files.ceganet.opr.ca.gov/254048-4/attachment/DP7ry4Y7vaT3ho2VpMk5yvE2jAcHEhp_P64HxaRXcUkzcMPnXFg7jZjNI7CRuyBlbuLFnhY-ovnka4zY0)





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San Bernardino County Behavioral Health Comprehensive Treatment Campus

Project Site Plan

Figure 1-1

## 2.0 ANALYSIS METHODOLOGY

The Guidelines provide the following process for VMT analysis:

1. Project Screening
2. Project Generated Methodology
3. Identify VMT Impact Threshold

### 2.1 SCREENING CRITERIA ASSESSMENT

The Guidelines provide two (2) types of screening to determine if a project could be screened out from conducting a detailed project level VMT analysis.

- *Daily Vehicle Trips* – The project results in a net increase of 1,285 or less weekday daily trips.
- *Land Use Types* – The following land use types will be used for screening:
  - Single family or Multifamily residential – 136 dwelling units or less
  - Office – 227,000 square feet (sf)
  - Retail – 122,000 sf
  - Warehousing – 829,000 sf
  - Light Industrial – 296,000 sf
  - K-12 Public School
  - Daycare/Childcare/Pre-K
  - Affordable housing
  - Student housing projects on or adjacent to college campuses
  - Community Institutions, Social Services and Public Buildings

### 2.2 PROJECT GENERATED METHODOLOGY

Projects that do not meet any of the screening criteria identified would need to perform a VMT analysis. The Production/Attraction method must be used for projects with a single land use and the Origin/Destination method must be used for projects with mixed land use types.

### 2.3 VMT THRESHOLDS

A project's VMT generation per service population shall be less than the City's VMT General Plan buildout per service population.

## 3.0 PROJECT VMT ASSESSMENT

The Project is proposing the construction of treatment facilities and transitional housing including 138 beds.

### 3.1 SCREENING CRITERIA ASSESSMENT

*Daily Vehicle Trips* – Per the Guidelines, trip generation for proposed uses must be calculated based on rates from the *Trip Generation Manual (TGM), 11<sup>th</sup> Edition*, published by the Institute of Transportation Engineers (ITE). ITE average trip generation rates and trip calculations summary for the Project land uses are presented in **Table 3-1** and **Table 3-2**, respectively.

**Table 3-1 – Project Trip Generation Rates**

Land Use <sup>1</sup>	Units <sup>2</sup>	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Assisted Living	Beds	254	0.11	0.07	0.18	0.09	0.15	0.24	2.60

<sup>1</sup>Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021). Included in Attachment 2.

**Table 3-2 – Project Trip Generation Summary**

Land Use <sup>1</sup>	Intensivity	Units <sup>2</sup>	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Assisted Living	138	Bed	15	10	25	12	21	33	359

<sup>1</sup>Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021). Included in Attachment 2.

As shown in Table 3-2, the Project is anticipated to generate approximately 359 weekday daily trips, which is less than the threshold of 1,285 trips. **Therefore, the Project would be presumed to have a less than significant VMT impact under this criterion.**

*Land Use Type* – The Project includes assisted living and associated services provided by the County of San Bernardino, which is a social service. **Therefore, the Project would be presumed to have a less than significant VMT impact under this criterion.**

**3.2 CONCLUSION**

As concluded in Section 3.1 of this report, the Project screens out since it meets the *Daily Vehicle Trips* and *Land Use Type* screening criteria as a social service and therefore, is presumed to have a less than significant VMT impact. It is our recommendation that the project be approved with no additional project-level VMT analysis.



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**APPROVED**  
CITY OF VICTORVILLE  
ENGINEERING DEPARTMENT

12/05/2024

**NO TIA REQUIRED**

Date: November 1, 2024

To: Nicoale Sylvestre, City Traffic Engineer, City of Victorville

From: George Ghossain, Principal Engineer, Integrated Engineering Group

Subject: **TRIP GENERATION ASSESSMENT FOR SAN BERNARDINO COUNTY BEHAVIORAL HEALTH COMPREHENSIVE TREATMENT CAMPUS PROJECT**

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Integrated Engineering Group (IEG) is pleased to submit this trip generation assessment for the San Bernardino County Behavioral Health Comprehensive Treatment Campus project (Project) located at 13333 Palmdale Road, southeast of the intersection of Palmdale Road and Cobalt Road in the City of Victorville, California. The Project is proposing the expansion of St. John of God Health Care Services with new treatment facilities and transitional housing under the following programs:

- Behavioral Health Continuum Infrastructure Program (BHCIP) – 86 total beds
  - 32 beds in the Adult Substance Use Disorder (SUD) Residential Treatment Building
  - 24 beds in the Adult Withdrawal Management Building
  - 16 beds in the Adolescent SUD Residential Treatment Building
  - 14 beds in the Adolescent Psychiatric Residential Treatment Facility
- Community Care Expansion (CCE) Program – 52 total beds among 3 Recovery Residential buildings

Our goal is to obtain comments from City of Victorville staff, to ensure that this memo fully addresses the analysis requirements per the City of Victorville *General Guidelines For Conducting Traffic Studies and Determination of Intersection Level of Service and Improvement Needs* (January 2005). These guidelines are a supplement to the *SANBAG Congestion Management Plan Guidelines* (June 2016). Therefore, the more recent San Bernardino County Transportation Authority *Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (Guidelines, February 2020) will be utilized.

The preliminary site plan for the Project is shown on **Attachment 1**. Access to the Project site will be provided via two (2) proposed driveways along Cobalt Road.

## TRIP GENERATION

Trip generation is a measure or forecast of the number of trips that begin or end at the project site. The traffic generated is a function of the extent and type of development proposed for the site. These trips will result in some traffic increases on the streets where they occur. Per the Guidelines, trip generation for proposed uses must be



calculated based on rates from the *Trip Generation Manual (TGM), 11<sup>th</sup> Edition*, published by the Institute of Transportation Engineers (ITE), to determine if this project satisfies the thresholds to be exempt from preparing a transportation analysis. ITE average trip generation rates and trip calculations summary for the Project land uses are presented in **Table 1** and **Table 2**, respectively.

**Table 1 – Project Trip Generation Rates**

Land Use <sup>1</sup>	Units <sup>2</sup>	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Assisted Living	Beds	254	0.11	0.07	0.18	0.09	0.15	0.24	2.60

<sup>1</sup>Trip Generation Source: Institute of Transportation Engineers (ITE), *Trip Generation Manual*, Eleventh Edition (2021). Included in **Attachment 2**.

**Table 2 – Project Trip Generation Summary**

Land Use <sup>1</sup>	Intensity	Units <sup>2</sup>	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Assisted Living	138	Bed	15	10	25	12	21	33	359

<sup>1</sup>Trip Generation Source: Institute of Transportation Engineers (ITE), *Trip Generation Manual*, Eleventh Edition (2021). Included in **Attachment 2**.

As shown in Table 2, the Project is anticipated to generate approximately 359 daily trips, 25 AM peak hour trips and 33 PM peak hour trips.

**LEVEL OF SERVICE TRAFFIC STUDY EXEMPTION**

Per the Guidelines, a TIA must be prepared when a Project generates greater than 250 two-way peak hour trips. Table 2 demonstrated that the Project would generate less than this threshold. Therefore, this memo is considered sufficient and no additional level of service traffic analysis is necessary.

- Attachments: 1 – Project Site Plan  
 2 – Trip Generation Supplemental Information<sup>30</sup>





**Attachment 2 - Trip Generation Supplemental Information**

# Land Use: 254

## Assisted Living

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### Description

An assisted living complex is a residential setting that provides either routine general protective oversight or assistance with activities necessary for independent living to persons with mental or physical limitations. The typical resident has difficulty managing in an independent living arrangement but does not require nursing home care. Its centralized services typically include dining, housekeeping, social and physical activities, medication administration, and communal transportation.

The complex commonly provides separate living quarters for each resident. Alzheimer's and ALS care are commonly offered at an assisted living facility. Living quarters for these patients may be located separately from the other residents.

Assisted care commonly bridges the gap between independent living and a nursing home. In some areas of the country, an assisted living residence may be called personal care, residential care, or domiciliary care. Staff may be available at an assisted care facility 24 hours a day, but skilled medical care—which is limited in nature—is not required. Congregate care facility (Land Use 253), continuing care retirement community (Land Use 255), and nursing home (Land Use 620) are related uses.

### Additional Data

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in Connecticut, New Jersey, New York, Oregon, Pennsylvania, Tennessee, Texas, and Utah.

### Source Numbers

244, 573, 581, 611, 725, 876, 877, 912, 1016, 1029

# Assisted Living (254)

Vehicle Trip Ends vs: Beds  
On a: Weekday

Setting/Location: General Urban/Suburban

Number of Studies: 2

Avg. Num. of Beds: 135

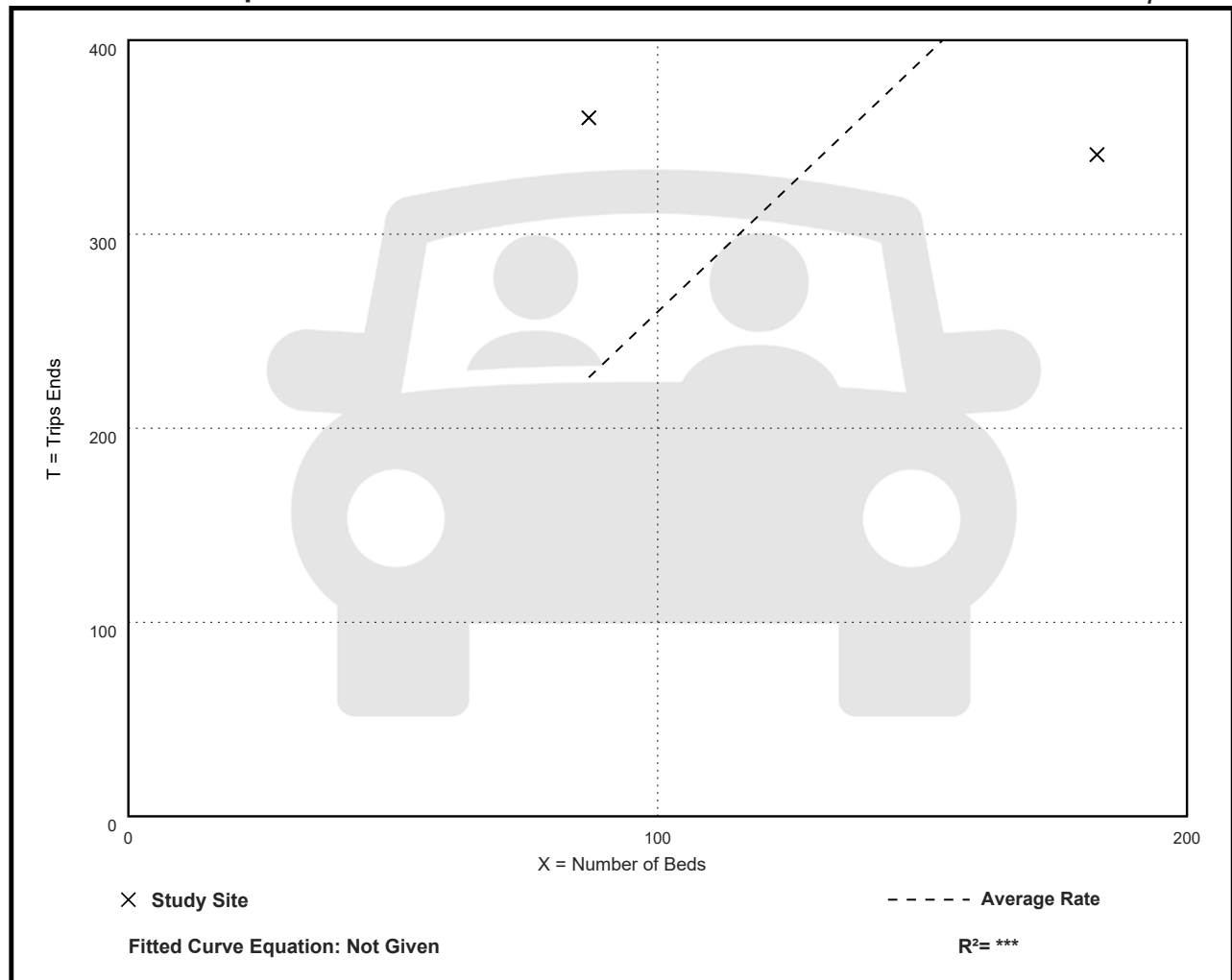
Directional Distribution: 50% entering, 50% exiting

## Vehicle Trip Generation per Bed

Average Rate	Range of Rates	Standard Deviation
2.60	1.86 - 4.14	***

## Data Plot and Equation

Caution – Small Sample Size



# Assisted Living (254)

## Vehicle Trip Ends vs: Beds

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 14

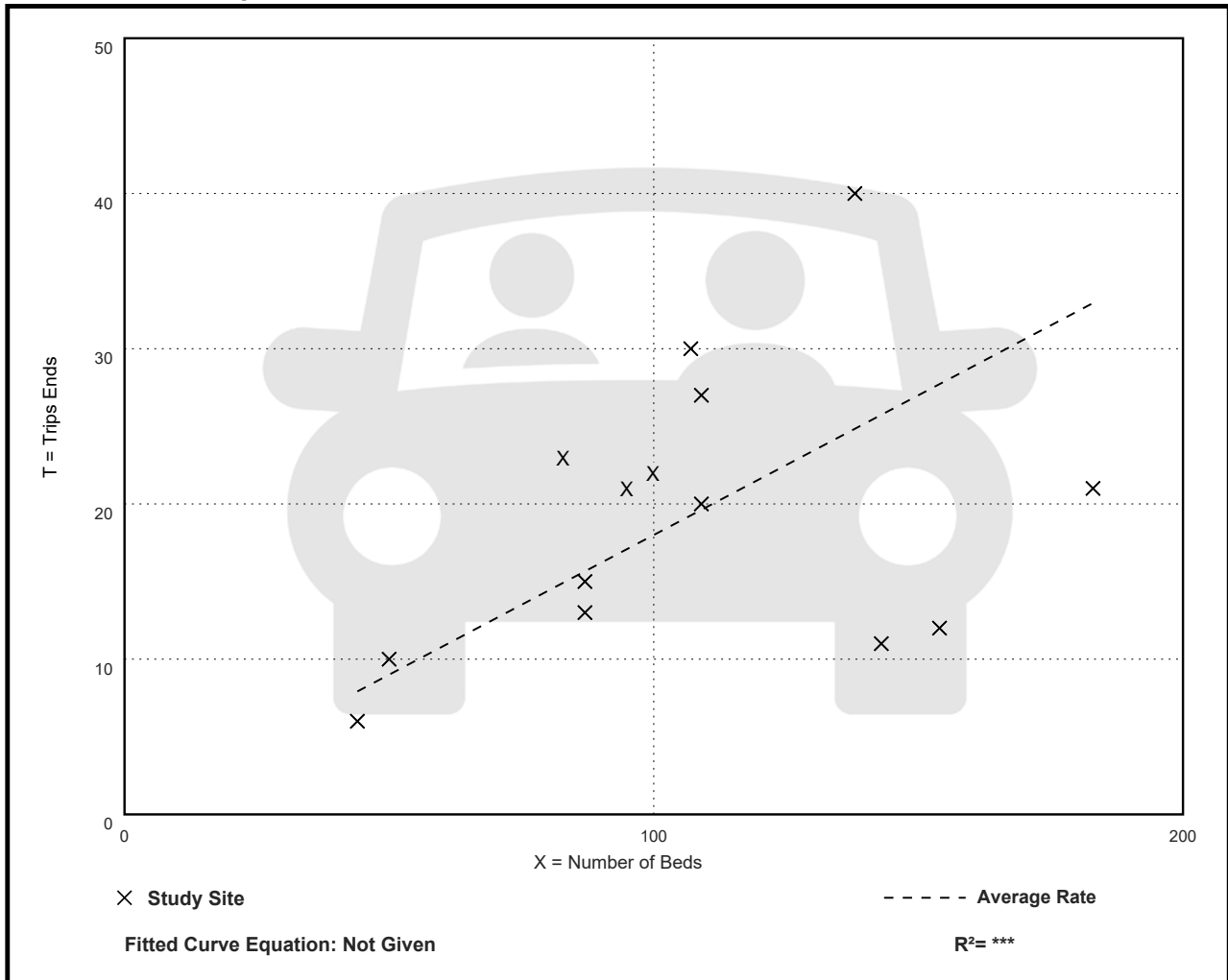
Avg. Num. of Beds: 106

Directional Distribution: 60% entering, 40% exiting

## Vehicle Trip Generation per Bed

Average Rate	Range of Rates	Standard Deviation
0.18	0.08 - 0.29	0.08

## Data Plot and Equation



# Assisted Living (254)

## Vehicle Trip Ends vs: Beds

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 14

Avg. Num. of Beds: 106

Directional Distribution: 39% entering, 61% exiting

## Vehicle Trip Generation per Bed

Average Rate	Range of Rates	Standard Deviation
0.24	0.11 - 0.34	0.07

## Data Plot and Equation

