

## Exhibit B

### SCOPING AGREEMENT FOR TRAFFIC IMPACT ANALYSIS

This following form shall be used to acknowledge preliminary approval of the scope for the traffic impact analysis (TIA) of the following project. The TIA must follow the City of Rialto Traffic Impact Analysis – Report Guidelines and Requirements, adopted by the City Council on \_\_\_\_\_.

#### City of Rialto

#### Traffic Impact Analysis

#### Scoping Agreement

Case No. MC2021-0023, CPD2021-0022, PPD2021-0020 ,and EAR2021-0023

Related Cases -

SP No. Agua Mansa Specific Plan

EIR No. Agua Mansa Specific Plan EIR

GPA No. N/A

ZC No. N/A

Project Name: Santa Ana Avenue Warehouse Project

Project Address: The project is located on Santa Ana Avenue between Willow Avenue and Lilac Avenue.

Project Description: The project will include a 43,000 square-foot industrial warehouse.

#### Consultant

#### Developer

Name: LSA Associates, Inc.

Lord Constructors, Inc.

Address: 1500 Iowa Avenue, Suite 200, Riverside, CA 92507

1920 W. 11th Street, Upland, California 91786

Telephone: (951) 781-9310

(909) 946-6729

Fax: \_\_\_\_\_

(909) 946-3626

**1. Trip Generation Source:** ITE Trip Generation Manual, 10th Edition

Existing GP Land Use General Industrial Proposed Land Use Warehousing

Current Zoning: Heavy-Industrial (H-IND) Proposed Zoning: Heavy-Industrial (H-IND)

Total Daily Project Trips: 112

Current Trip Generation			Proposed Trip Generation		
In	Out	Total	In	Out	Total
AM Trips			9	4	13
PM Trips			2	12	14
Internal Trip Allowance	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	( _____ % Trip Discount)		
Pass-By Trip Allowance	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	( _____ % Trip Discount)		

For appropriate land uses, a pass-by trip discount may be allowed not to exceed 25%. Discount trips shall be indicated on a report figure for intersections and access locations.

**2. Trip Geographic Distribution:** N % S % E % W %

(Detailed exhibits of trip distribution must be attached with Trucks as a separate exhibit)

**3. Background Growth Traffic**

Project Completion Year: 2022 Annual Background Growth Rate: \_\_\_\_\_%

Other Phase Years \_\_\_\_\_

Other area projects to be considered: \_\_\_\_\_

(Contact Planning for Lists. Correlate projects to exhibit map and also indicate which projects have been included in study area forecasts for existing + background growth + project + cumulative)

Model/Forecast methodology: \_\_\_\_\_

**4. Study Intersections:** (NOTE: Subject to revision after other projects, trip generation and distribution are determined, or comments from other agencies received.)

- |          |           |
|----------|-----------|
| 1. _____ | 6. _____  |
| 2. _____ | 7. _____  |
| 3. _____ | 8. _____  |
| 4. _____ | 9. _____  |
| 5. _____ | 10. _____ |

**5. Study Roadway Segments:** (NOTE: Subject to revision after other projects, trip generation and distribution are determined, or comments from other agencies received.)

- |          |           |
|----------|-----------|
| 1. _____ | 6. _____  |
| 2. _____ | 7. _____  |
| 3. _____ | 8. _____  |
| 4. _____ | 9. _____  |
| 5. _____ | 10. _____ |

**6. Other Jurisdictional Impacts**

Is this project within any other Agency's Sphere of Influence or within one-mile of another jurisdictional boundary? Yes ☒ No ☐

If so, name of Jurisdiction: City of Colton, County of San Bernardino

**7. Site Plan** (please attach 11" x 17" legible copy) **Provided with Trip Gen and VMT Memo**

**8. Specific issues to be addressed in the Study (in addition to the standard analysis described in the Guideline)** (to be filled out by the City of Rialto Public Works Department) (NOTE: If the traffic study states that "a traffic signal is warranted" (or "a traffic signal appears to be warranted," or similar statement) at an existing un-signalized intersection under existing conditions, 8-hour approach traffic volume information must be submitted in addition to the peak hourly turning movement counts for that intersection.)

~~Vehicle Miles Traveled Analysis, Active Transportation and Public Transit Analysis,~~  
~~On-Site Parking Demand Using City Municipal Code, Sight Distance Analysis, General~~  
~~Plan Circulation Element Consistency~~

**9. Existing Conditions**

Traffic count data must be new or within one year. Provide traffic count dates if using other than new counts.

Date of counts: \_\_\_\_\_

**NOTE Fees are due and must be submitted with, or prior to submittal of this form. The City will not process the Scoping Agreement prior to the receipt of the processing fee.**

Fees Paid: \$ \_\_\_\_\_ Date \_\_\_\_\_

Traffic Impact Analysis – Report Guidelines and Requirements  
Exhibit B  
Scoping Agreement

**Recommended:**

Scoping Agreement Submittal date 10/22/2021

Scoping Agreement Resubmittal date \_\_\_\_\_

**Ambarish Mukherjee** Digitally signed by Ambarish Mukherjee  
Date: 2021.10.22 15:27:37 -07'00'

**10/22/2021**

Applicant/Engineer

Date

**Land Use Concurrence:**

  
Development Services Department

**10-26-2021**

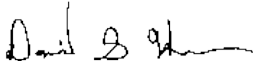
Date

**Approved by:**

  
Public Works Department

**10/26/21**

Date



**10-27-2021**

**NOTE:**

The Applicant/Engineer acknowledges that the Scoping Agreement is intended to assist in the preparation of any required TIA. It is preliminary in nature and the City does not have sufficient data to determine the ultimate conditions that may be imposed for the project. It does not provide nor limit the requirements imposed on the Project but is intended only to provide initial input into the parameters for review of the traffic generated by the Project and the initial areas to be considered and studied. Subsequent changes to scope of required analysis to be included in the TIA may be required by the Transportation Commission, Planning Commission, and/or the City Council upon Public Works Director/City Engineer review and approval.



CARLSBAD  
CLOVIS  
IRVINE  
LOS ANGELES  
PALM SPRINGS  
POINT RICHMOND  
RIVERSIDE  
ROSEVILLE  
SAN LUIS OBISPO

October 13, 2021

Justin Schlaefli  
Traffic Engineer  
City of Rialto  
335 West Rialto Avenue  
Rialto, California 92376

Subject: Santa Ana Avenue Warehouse Project Trip Generation and Vehicle Miles Traveled  
Analysis Memorandum (LSA Project No. LC12102)

Dear Justin:

LSA Associates, Inc. (LSA) is under contract to prepare a Trip Generation and Vehicle Miles Traveled Analysis Memorandum (Memo) for the proposed Santa Ana Avenue Warehouse Project (project) in the City of Rialto (City). The project will consist of a 43,000 square-foot (sf) industrial warehouse located on Santa Ana Avenue between Willow Avenue and Lilac Avenue. The project's assessor's parcel number (APN) is 0258-111-37. The project will be consistent with the City's General Plan land use and zoning designation. Figure 1 (all figures and tables attached) illustrates the regional and project location. Figure 2 illustrates the conceptual site plan for the project.

The objectives of this Memo are as follows:

- To estimate the trip generation for the proposed project and determine whether a Traffic Impact Analysis (TIA) will be required for the project; and
- To determine whether a VMT analysis will be required for the proposed project.

## TRIP GENERATION ANALYSIS

Trip generation for the warehouse use was developed using rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (10th Edition) for Land Use 150 – "Warehousing". Project trips were converted to trucks and passenger vehicles based on the South Coast Air Quality Management District (SCAQMD) recommendations for warehousing projects. As such, 31 percent of project traffic will be trucks. The SCAQMD truck and passenger vehicle mix recommendations are attached in Appendix A. Based on vehicle mix from the City's Public Works Department *Traffic Impact Analysis Report Guidelines and Requirements*, dated December 2013, the truck mix was considered as 70% 4- and more axle, 28% 3-axle, and 2% 2-axle trucks. Additionally, based on the City's TIA guidelines, all truck trips were converted to passenger car equivalents (PCEs) using a 1.5 PCE factor for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4- and more axle trucks.

Table A summarizes the project trip generation and shows that the proposed project is anticipated to generate 8 trips in the a.m. peak hour, 9 trips in the p.m. peak hour, and 74 daily trips. The PCE trips are 13 PCE trips in the a.m. peak hour, 14 PCE trips in the p.m. peak hour, and 112 daily PCE trips.

As per the City's TIA Guidelines, a TIA may not be required for a project if it generates less than 50 peak hour PCE vehicle trips. Since the anticipated number of peak hour trips generated by the proposed project is lower than the 50-trip threshold established by the City's TIA Guidelines, a TIA may not be required for this project.

## VEHICLE MILES TRAVELED ANALYSIS

On December 28, 2018, the California Office of Administrative Law cleared the revised California Environmental Quality Act (CEQA) Guidelines for use. Among the changes to the guidelines was the removal of vehicle delay and level of service as the sole basis of determining CEQA impacts. With the implementation of the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled (VMT).

The City of Rialto currently uses the San Bernardino County's (County) *Transportation Impact Study Guidelines* (dated July 9, 2019) for VMT analyses. Per the County's VMT guidelines, a project generating less than 110 daily vehicle trips can be considered as a low VMT generator and can be considered to have a less than significant VMT impact. The 110 vehicle trip threshold in the County's VMT guidelines was obtained from the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA (TA)* (dated December 2018). Additionally, Section C1 (page 4) of the OPR TA states the following:

*"vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks."*

As such, the OPR TA advises that to prepare "an apples-to-apples comparison" the project's VMT and the regional threshold should be consistent. The County's VMT guidelines recommend using VMT/Employee as the metric for evaluating VMT impacts for industrial projects. The VMT/Employee is calculated for only the home-based work trip purpose which does not include any truck trips. Therefore, consistent with guidance provided by OPR TA and the County's guidelines, only passenger vehicles have been considered for this analysis.

As shown in Table A, the project will generate 52 daily passenger vehicle trips. Since the proposed project is forecasted to generate less than 110 daily passenger vehicle trips, it can be presumed that the project is anticipated to have a less than significant VMT impact and is screened out from a VMT assessment.

## ACTIVE TRANSPORTATION AND PUBLIC TRANSIT ANALYSIS

According to the County Guidelines, a significant impact occurs when a project conflicts with adopted plans, policies, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreases the performance or safety of such facilities.

Based on the Circulation Chapter of the City's General Plan, adopted December 2010, at present, there is a Class II bicycle facility planned on Santa Ana Avenue within the study area. There is currently no existing bicycle facility along the project frontage. The project is not anticipated to

affect the operations of the proposed bike lane. As such, the project will not decrease the performance or safety of any existing or proposed bicycle facility.

According to the Circulation Chapter of the City's General Plan, adopted December 2010, pedestrian facilities such as sidewalks create additional means of access to service; improves the quality of life for those without access to motorized vehicles; can be conducive to healthier lifestyles and exercise; and may help foster a sense of community and social connection in residential neighborhoods by improving the interaction and chance encounters of neighbors. Within the project study area, there are no existing paved sidewalks on Santa Ana Avenue. The project will provide sidewalk along the South side of Santa Ana Avenue adjacent to the project site, thus providing direct and convenient access for visitors arriving project site on foot. Additionally, the project will not affect any existing sidewalks. As such, the project will not decrease the performance or safety of any existing or proposed pedestrian facility.

The nearest bus stop from the project site is approximately 0.6 miles. Omnitrans bus route 329 serves this bus stop. Omnitrans bus route 329 connects Rialto to communities in adjacent jurisdictions such as Fontana and Bloomington. At present, there are no proposed service changes in Omnitrans's transit network. As such, the project will not decrease the performance or safety of any existing or proposed public transit facility.

The project does not conflict with existing or proposed bicycle, pedestrian, and public transit facilities. Therefore, the project will conform to all adopted policies, plans, or programs concerning these facilities and will not have a significant impact.

### ON-SITE PARKING DEMAND USING CITY MUNICIPAL CODE

A parking demand analysis for the proposed project was prepared using rates from the City of Rialto Municipal Code Chapter 18.58 – “Off-Street Parking” Section 18.58.050 – “Office, commercial and industrial parking requirements.” As per the City's Municipal Code, the following required parking spaces rates were used in this analysis:

- Office (1st Floor): 1 space per 250 sf;
- Office (2nd Floor): 1 space per 500 sf;
- Factory Industrial/Warehouse (first 10,000 sf): 1 space per 1,000 sf; and
- Factory Industrial/Warehouse (every additional 10,000 sf): 1 space per 2,000 sf.

Table B summarizes the project site parking requirements. As summarized in Table B, the minimum parking requirement using the City's municipal code is 37 parking spaces. The total parking provided on site is 41 parking spaces. Therefore, the proposed project is providing a surplus of 4 parking spaces.

Additionally, the City municipal code requires handicapped parking spaces on site for industrial uses. As per the City's municipal code, 2 handicapped parking spaces are required out of the total available parking spaces if the project site provides a total number of 41 to 80 parking spaces. As

illustrated in previously referenced Figure 2, the project site provides 2 handicapped parking spaces and 3 electric vehicle/clean air vehicle parking spaces out of the 41 parking spaces on site.

## SIGHT DISTANCE ANALYSIS

A sight distance analysis was requested by City staff for the ingress/egress project traffic and traffic along Santa Ana Avenue with respect to the proposed project driveway. Sight distance is the length of the visible roadway a driver can see approaching vehicles before their line of sight (i.e. length, width, and height from the driver's eye) is blocked by any object. For purposes of this memorandum, only the stopping sight distance and corner sight distance have been evaluated.

According to the *Caltrans Highway Design Manual (HDM)* (dated July 2020), the stopping sight distance is the minimum sight distance along a roadway required to allow a driver to decrease their speed from the design speed to a complete stop. The corner sight distance is the minimum sight distance in which a driver at a stop controlled approach can see oncoming traffic on the major street to safely maneuver onto the roadway.

The stopping sight distance was evaluated on the major arterial abutting the project, i.e. Santa Ana Avenue. The posted speed limit on Santa Ana Avenue is 40 miles per hour (mph). For purposes of this analysis, the posted speed limit has been considered as the design speed. As stated in Table 201.1 of the HDM, the minimum stopping sight distance is 300 feet (ft) for a design speed of 40 mph. However, according to the American Association of State Highway and Transportation Officials (AASHTO) *A Policy on Geometric Design of Highways and Streets* Table 3-1, the minimum stopping sight distance is 305 feet for a design speed of 40 mph. Therefore, as a conservative approach, the minimum stopping sight distance for this analysis has been considered as 305 feet. Figure 3 illustrates the stopping sight distance triangles on Santa Ana Avenue. Additionally, based on recommendations from the AASHTO manual, the height of driver's eye was considered to be approximately 3.54 feet. The project sight triangle will require to have no sight distance obstructions due to project landscaping to provide a clear sight distance to project egress traffic. Figure 4 illustrates the proposed project landscaping influencing the stopping sight distance triangles along the project frontage. As illustrated in Figure 4, the proposed landscaping along the project frontage will not block the sight distance for drivers on Santa Ana Avenue. As such, the project will avoid implementing landscaping taller than 3.54 feet that falls within the sight triangle.

As for corner sight distance, Section 405.1 of the HDM states that corner sight distance requirements are not applicable for urban driveways unless signalized. Therefore, corner sight distance was not evaluated for the project driveway.

As illustrated in Figure 3, to achieve the adequate sight distances and have clear sight triangles for the drivers, it is required to remove some of the existing on-street parking spaces along the southern side of Santa Ana Avenue. Specifically, on-street parking spaces need to be removed along the width of the project driveway and along the entire length of the project frontage on the southern side of Santa Ana Avenue. Since the total length of the project frontage on Santa Ana Avenue is approximately 300 ft, 12 on-street parking spaces (parking spaces measured for cars at 25 ft per vehicle) may be required to be removed with the implementation of the project to provide adequate stopping sight distance.



## GENERAL PLAN CIRCULATION ELEMENT CONSISTENCY

According to the City's General Plan (GP) Chapter 4 (adopted December 2010), Santa Ana Avenue is classified as a Secondary Arterial within the project vicinity. Per GP Chapter 4, a Secondary Arterial has a cross section of 88 ft that consists of two 12-ft lanes of travel in each direction with a 8-ft width of permitted parking and 12-ft sidewalks along both sides of the street upon full buildout. The half width cross section is 32 ft from street centerline to the curb. Additionally, Santa Ana Avenue is designated as a bikeway route within the City's Bikeway Master Plan network. Within the project vicinity, Santa Ana Avenue is designated as a Class II Bikeway, which consists of a 4 ft minimum bike lane.

Within the project vicinity, Santa Ana Avenue is currently a two lane roadway with no sidewalks on both sides between Lilac Avenue and Willow Avenue. This segment of Santa Ana Avenue is currently not built out to its ultimate width as identified in the City's General Plan. It should be noted that the existing industrial buildings adjacent on both sides of the proposed project also currently do not have a sidewalk or a bike lane along the respective building frontages. Santa Ana Avenue will have an ultimate right-of-way (ROW) of 88 ft along the project frontage, which may accommodate two lanes of travel in each direction and sidewalks as proposed in the City's Circulation Chapter. Figure 5 illustrates the cross-section of Santa Ana Avenue along the project frontage, which will be developed consistent with the City's General Plan. The project will be developing the 44 ft half width cross section from the street centerline to the project boundary, consistent with the City's General Plan. As such, Santa Ana Avenue will remain a two lane roadway with a sidewalk along the project frontage as the project is built.

Santa Ana Avenue along the project frontage will remain as a two lane roadway until the segment is developed to the ultimate ROW. When built out to the ultimate ROW, it will be up to the City's discretion to modify the roadway segment from a two lane roadway to a four lane roadway. It should also be noted that there is insufficient width to accommodate both on-street parking and a bike lane as outlined in the City's Circulation Chapter and Bikeway Master Plan. As illustrated in Figure 5, upon completion of widening of Santa Ana Avenue, there will be 8 ft remaining between the lanes and the sidewalk. The City will have the discretion to decide whether to assign the remaining 8 ft width on both sides of the street as on-street parking or as a Class II Bikeway as outlined in the City's Bikeway Master Plan network.

If you have any questions, please do not hesitate to contact me at (951) 781-9310 or [Ambarish.Mukherjee@lsa.net](mailto:Ambarish.Mukherjee@lsa.net).

Sincerely,

LSA



Ambarish Mukherjee, AICP, PE  
Principal

Attachments:

Figure 1: Regional and Project Location

Figure 2: Conceptual Site Plan

Figure 3: Sight Distance Analysis

Figure 4: Project Landscaping Influence on Sight Distance

Figure 5: Cross Section Along Project Frontage

Table A: Project Trip Generation

Table B: Project Site Parking Requirements Based on City Parking Code

Appendix A: SCAQMD Warehouse Truck Trip Study Data Results and Usage

## FIGURES



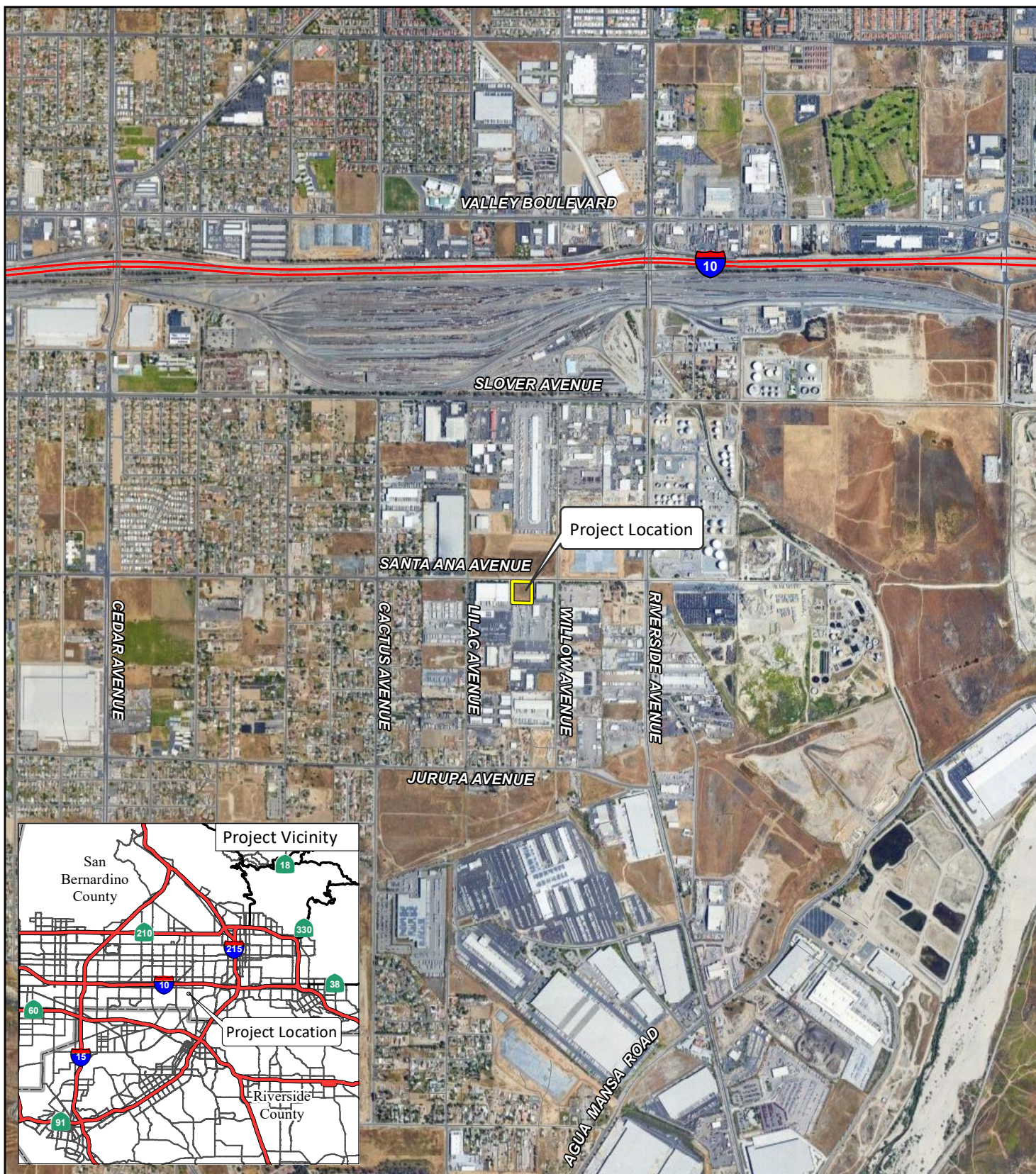
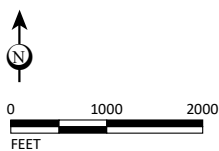


FIGURE 1

LSA



SOURCE: ESRI Streetmap, 2013; Google Earth, 2020.

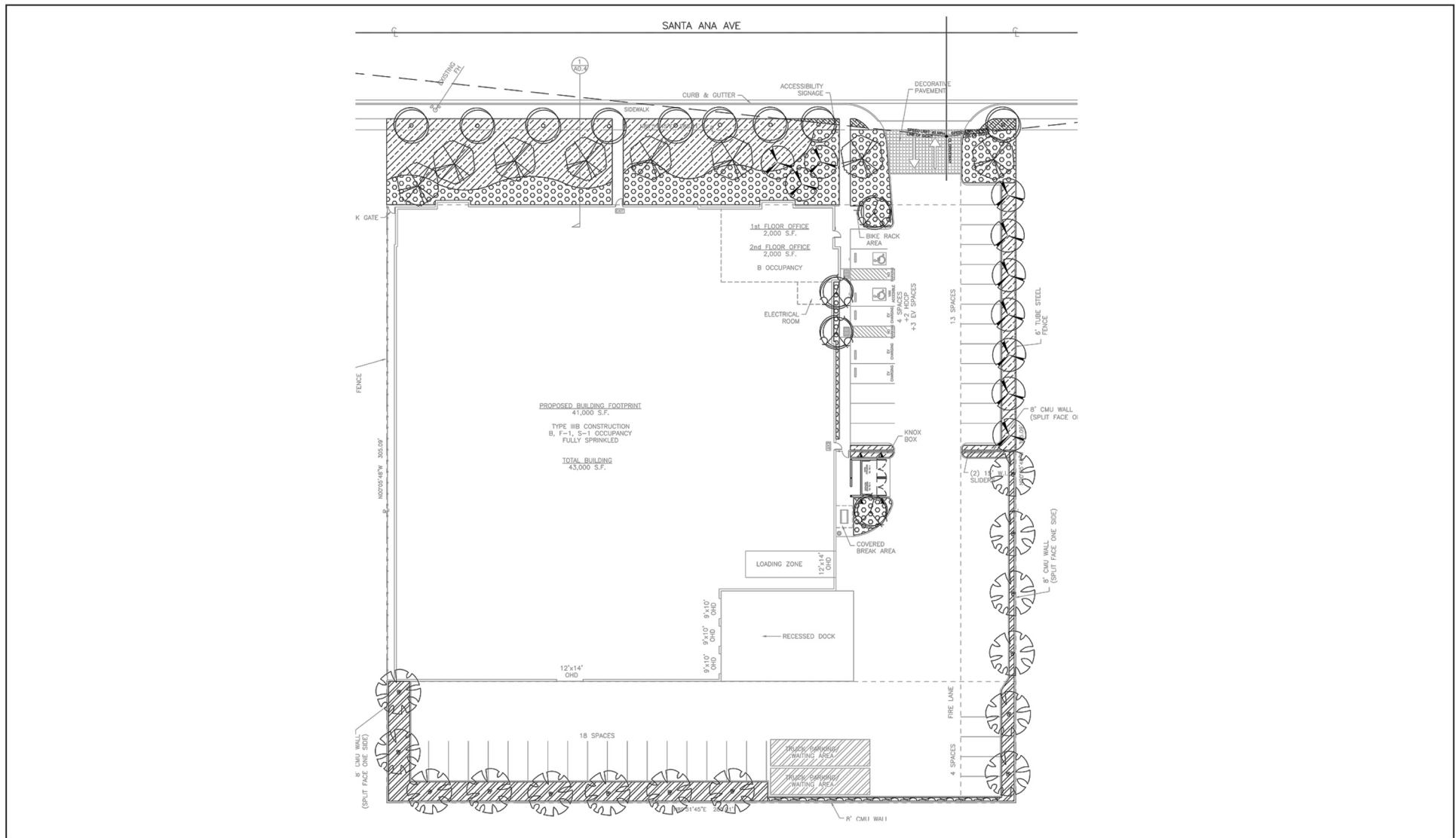
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*Santa Ana Avenue Warehouse Project*  
*Trip Generation and Vehicle Miles Traveled Analysis Memorandum*  
 Regional and Project Location









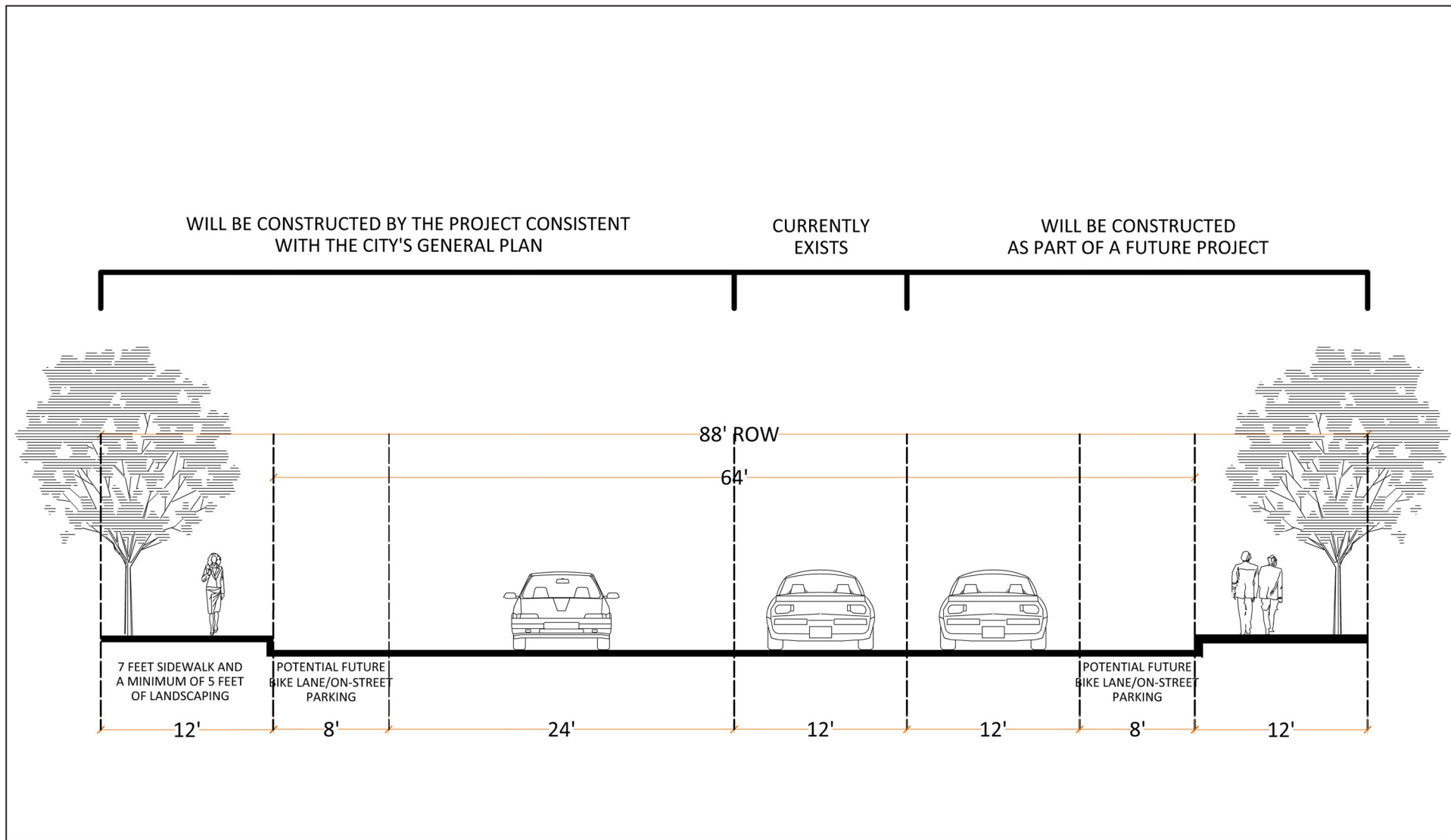
LSA FIGURE 4



**LEGEND**

SIGHT DISTANCE RESTRICTED ZONE  
 PER CITY OF RIALTO  
 SANTA ANA AVE SPEED LIMIT 40  
 LIMITED USE AREA TO BE KEPT CLEAR OF ALL  
 OBSTRUCTIONS OVER 12' HIGH, INCLUDING VEGETATION

Santa Ana Avenue Warehouse Project  
 Trip Generation and Vehicle Miles Traveled Analysis Memorandum  
 Project Landscaping Influence on Sight Distance



LSA

FIGURE 5

*Santa Ana Avenue Warehouse Project*  
*Trip Generation and Vehicle Miles Traveled Analysis Memorandum*  
 Proposed Santa Ana Avenue Cross Section along Project Frontage



## TABLES

**Table A - Warehousing Trip Generation**

Land Uses	Units	A.M. Peak Hour			P.M. Peak Hour			Daily
		In	Out	Total	In	Out	Total	
<b>Warehouse<sup>1</sup></b>								
	43.00 TSF							
Trips/Unit (Cars)		0.089	0.028	0.117	0.035	0.096	0.131	1.201
Trips/Unit (2-Axle Trucks)		0.001	0.000	0.001	0.000	0.001	0.001	0.011
Trips/Unit (3-Axle Trucks)		0.012	0.003	0.015	0.004	0.012	0.016	0.151
Trips/Unit (4+ Axle Trucks)		0.028	0.009	0.037	0.011	0.031	0.042	0.377
Trips/Unit (Total)		0.130	0.040	0.170	0.050	0.140	0.190	1.740
Trip Generation (Cars)		4	1	5	2	4	6	52
Trip Generation (2-Axle Trucks)		0	0	0	0	0	0	0
Trip Generation (3-Axle Trucks)		1	0	1	0	1	1	6
Trip Generation (4+ Axle Trucks)		1	1	2	0	2	2	16
Trip Generation (Total)		6	2	8	2	7	9	74
Trip Generation (Cars)		4	1	5	2	4	6	52
PCE Trip Generation (2-Axle Trucks)		0	0	0	0	0	0	0
PCE Trip Generation (3-Axle Trucks)		2	0	2	0	2	2	12
PCE Trip Generation (4+ Axle Trucks)		3	3	6	0	6	6	48
<b>PCE Trip Generation (Total)</b>		<b>9</b>	<b>4</b>	<b>13</b>	<b>2</b>	<b>12</b>	<b>14</b>	<b>112</b>

**Notes:**

TSF = thousand square-feet

<sup>1</sup> The trip generation was developed based on the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (10th Edition) rates for Land Use 150 – “Warehousing.” The resulting trips were converted to trucks and passenger vehicles based on the South Coast Air Quality Management District (SCAQMD) recommendations for warehousing projects. As such, 31 percent of project traffic will be trucks. Based on Vehicle Mix from the City of Rialto's *Traffic Impact Analysis Report Guidelines and Requirements*, dated February 2014, the truck mix was considered as 2% 2-axle trucks, 28% 3-axle trucks, and 70% 4-and-more axle trucks. Based on the City's TIA guidelines, all truck trips were converted to passenger car equivalents (PCEs) using a 1.5 PCE factor for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4-and-more axle trucks.

**Table B - Project Site Parking Requirements Based on City Parking Code**

<b>Building Area Land Use</b>	<b>Size</b>	<b>Parking Rate<sup>1</sup></b>	<b>Parking Spaces Required as per Code</b>
Office (1st Floor)	2.00 TSF	1 space/250 sf	8
Office (2nd Floor)	2.00 TSF	1 space/500 sf	4
Factory Industrial/Warehouse	39.00 TSF	1 space/1,000 sf (up to the first 10 TSF)	10
		1 space/2,000 sf (per additional 10 TSF)	15
<b>Total Parking Required as per Parking Code</b>			<b>37</b>
<b>Total Parking Provided On-Site</b>			<b>41</b>
<b>Total Parking Required as per Parking Code</b>			<b>37</b>
<b>Surplus / (Deficit)</b>			<b>4</b>

**Notes:**

TSF = Thousand Square Feet; sf = square feet

<sup>1</sup> Parking rates based on Section 18.58.050 (Off-Street Parking) of the *City of Rialto Municipal Code* for "Office, commercial and industrial parking requirements".

**APPENDIX A:**

**SCAQMD WAREHOUSE TRUCK TRIP STUDY DATA RESULTS AND USAGE**

# SCAQMD Warehouse Truck Study Truck Fleet Mix

Grouping	All Trucks	Actual %		
		2-Axle	3-Axle	4+ Axle
SCAQMD Composite	31.0%	6.8%	5.5%	18.7%
With Cold Storage	44.7%	15.5%	4.9%	24.3%
Without Cold Storage	27.5%	4.6%	5.7%	17.2%
Fontana Study	20.4%	3.5%	4.6%	12.3%

Grouping	All Trucks	Normalized %		
		2-Axle	3-Axle	4+ Axle
SCAQMD Composite	31.0%	21.9%	17.7%	60.3%
With Cold Storage	44.7%	34.7%	11.0%	54.4%
Without Cold Storage	27.5%	16.7%	20.7%	62.5%
Fontana Study	20.4%	17.2%	22.5%	60.3%