

ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

Date: September 9, 2022
Prepared by: Hashem Basrawi
To: City of Perris
Site: 945-995 W. Markham Street Industrial Building
Subject: DRP22-00020: Vehicle Miles Traveled (VMT) & Trip Generation Screening Analysis

This technical memorandum evaluates the need to prepare a Level of Service (LOS) or Vehicle Miles Traveled (VMT) analysis for the proposed 89,000 SF industrial warehouse building (case no. DRP22-00020) located at 945-995 W. Markham Street (APN # 314-17-0009; 314-17-0010) in the City of Perris. Access to the project site will be provided via a passenger car driveway at the north-west side of the site and a truck driveway at the north-east side of the site. The existing site is partially developed with a single-family dwelling unit on the eastern parcel which also houses specialty contractor use for custom ironwork (Advance Iron Works). The western parcel of the project site is currently utilized as a contractor storage yard. The project site plan is shown in Figure 1.

Project Trip Generation and TIA Screening

The project trip generation was prepared using land use code 150 (Warehousing) trip rates that were obtained from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Passenger Car Equivalent (PCE) factors were added to project truck trips to account for the larger size, slower starting times, and reduced maneuverability of trucks.

Existing trips generated by the land uses currently on-site were reduced from the net project trip generation. Existing trip generation was prepared using land use codes 180 – Specialty Trade Contractor and 210 – Single Family Detached Housing trip rates that were obtained from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. No land use codes exist in the ITE Trip Generation Manual for storage yard and hence no trip generation credits were assumed for the contractor storage yard on the western parcel of the project site. Per the City of Perris, a TIA analysis is required for projects that will generate 50 or more peak hour trips.

As shown in Table 1, the project would generate a maximum of 19 net peak hour PCE trips. Based on the peak hour trip generation of 19 net PCE trips which is less than the City's threshold of 50 or more peak hour trips, the project would screen out from LOS and would not be required to prepare a LOS TIA.

VMT Screening Analysis

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating Transportation impacts. SB743 specified that the new criteria should promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. The bill also specified that delay-based level of service could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3 - Determining the Significance of Transportation Impacts states that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

City of Perris Transportation Impact Analysis Guidelines for CEQA include VMT analysis methodology, impact thresholds, and screening thresholds to determine if projects would require a vehicle miles traveled (VMT) analysis. The City's TIA Guidelines provide criteria for projects that would be considered to have a less-than significant impact on VMT and therefore could be screened from further VMT analysis. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

Screening Criteria

1. Project is 100% affordable housing.
2. Project is within one half mile of qualifying transit.
3. Project is a local serving land use.
4. Project is in a low VMT area.
5. Project generates less than 500 net daily trips.

The applicability of each Screening Criteria to the proposed project is discussed below.

Screening Criteria 1 – Project is 100% affordable housing: According to the City's guidelines, if a project consists of 100% affordable housing, then the presumption can be made that it will have a less than significant impact on VMT. Moreover, sources provided by the Office of Planning and Research (OPR) state that affordable housing projects typically generate lower VMT than market-rate housing and a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less than significant impact on VMT. Since this project is not considered a 100% affordable housing project, Screening Criteria 1 doesn't apply.

Screening Criteria 2 – Project is within one half mile of qualifying transit: The City's guidelines refer to CEQA Guideline Section 15064.3, subdivision (b)(1), which states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within one half mile of an existing major transit stop or an existing stop along a high quality transit corridor will have a less than significant impact on VMT. The project is not located within one half miles of qualifying transit. In addition, since this is an industrial warehouse project, Screening Criteria 2 doesn't apply.

Screening Criteria 3 – Project is a local serving land use: According to the City's guidelines, local serving land uses provide more opportunities for residents and employees to shop, dine and obtain services closer to home and work. Local serving uses can also include community resources that may otherwise be located outside of the city or local area. The project is not considered a local serving land use per the description in the City's guidelines, therefore Screening Criteria 3 doesn't apply.

Screening Criteria 4 – Project is in a low VMT area: According to the City's guidelines, projects that are located in areas with low VMT, and that incorporate similar features (i.e., land use type, access to the circulation network, etc.), will tend to exhibit similarly low VMT. If a project is located in a Traffic Analysis Zone (TAZ) with VMT per capita or VMT per employee that is less than or equal to the Citywide average, then the project is considered to be located in a low VMT area and can be presumed to have a less than significant impact on VMT. Western Riverside Council of Governments (WRCOG) web-based VMT screening tool has been utilized to determine if the project is not required to prepare a VMT analysis. The results of the WRCOG VMT screening tool for the project concluded that the project is not located in a low VMT area and therefore does not screen out of further VMT analysis based on this criteria. Figure 2 shows the inputted technical information as well as the results of the screening analysis.

Screening Criteria 5 – Project generates less than 500 net daily trips: According to the City's guidelines, development projects that generate less than 500 average daily trips (ADT) are considered to have a less than significant VMT impact. As shown in Table 1, the project would generate a total of 123 daily vehicle trips. Because the project would meet Screening Criteria 5, the project would be considered to have a less than significant impact on VMT and no further VMT analysis would be required.

Summary

As shown in Table 1, during the worst PM peak hour, the project would generate a maximum of 19 Passenger Car Equivalent (PCE) trips. Moreover, based on the peak hour trip generation of 19 PCE trips, the project would not be required to prepare a LOS TIA.

EPD Solutions used the City of Perris Transportation Impact Analysis Guidelines for CEQA that discusses analysis methodologies and screening thresholds to determine if this project would require a vehicle miles traveled (VMT) analysis. If a project meets the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

1. Project is 100% affordable housing.
2. Project is within one half mile of qualifying transit.
3. Project is a local serving land use.
4. Project is in a low VMT area.
5. Project generates less than 500 net daily trips.

The project would not meet Screening Criteria 1, 2, 3, or 4. However, the project is expected to generate 123 daily vehicle trips which is less than the City's threshold of 500 daily vehicle trips; therefore, Screening Criteria 5 is satisfied. Furthermore, VMT impacts would be considered less than significant and an analysis of VMT would not be required. City of Perris VMT scoping form is included in Attachment A.

If you have any questions about this information, please contact me at (909) 525-0528 or hashem@epdsolutions.com.

Figure 1: Project Site Plan

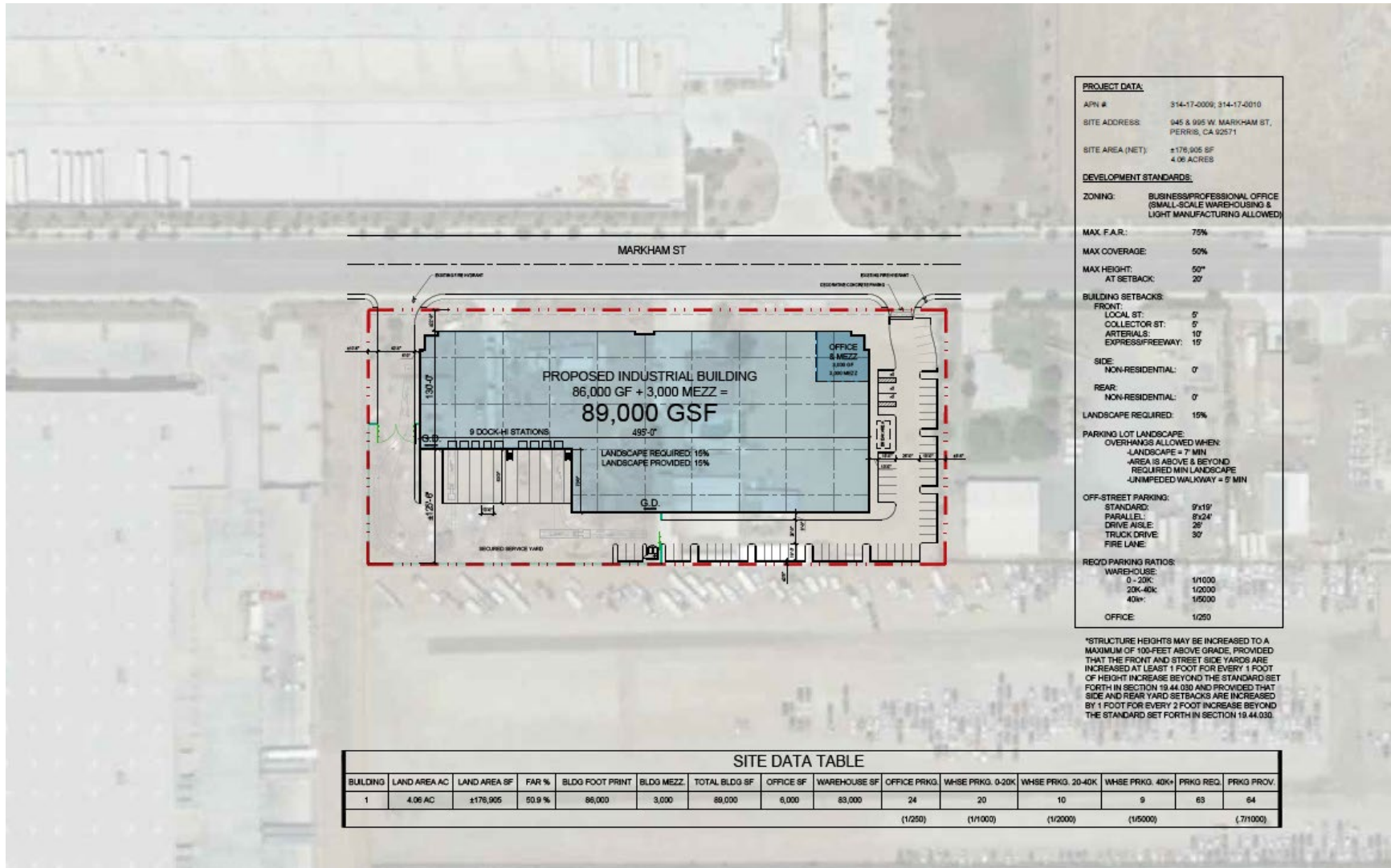


Table 1: Proposed Trip Generation

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
Trip Rates									
Warehousing Vehicles ¹	TSF	1.71	0.13	0.04	0.17	0.05	0.13	0.18	
Specialty Trade Contractor ²	TSF	9.82	1.23	0.43	1.66	0.30	0.63	0.93	
Single Family Detached Housing ³	DU	9.43	0.18	0.52	0.70	0.59	0.35	0.94	
Project Trip Generation									
Warehouse	89,000 TSF	152	12	3	15	4	12	16	
ITE Vehicle Mix⁴									
Passenger (64.9% Daily, 88.2% AM, 83.3% PM)		99	10	3	13	3	10	13	
Truck (35.1% Daily, 11.8% AM, 16.7% PM)		53	2	0	2	1	2	3	
		152	12	3	15	4	12	16	
Truck Vehicle Mix⁵									
	Percent⁵								
2-Axle truck	16.70%	9	0	0	0	0	0	0	
3-Axle truck	20.70%	11	1	0	1	0	0	0	
4+-Axle Trucks	62.50%	33	1	0	1	1	2	3	
	100%	53	2	0	2	1	2	3	
PCE Trip Generation⁶									
	PCE Factor⁶								
Passenger Vehicles	1.0	99	10	3	13	3	10	13	
2-Axle truck	1.5	13	1	0	1	0	0	0	
3-Axle truck	2.0	22	2	0	2	0	1	1	
4+-Axle Trucks	3.0	100	4	1	5	2	6	8	
		234	17	4	21	5	17	22	
Existing Trip Generation									
Specialty Trade Contractor									
Trip Generation²	2.00 TSF	20	2	1	3	1	1	2	
Single Family Detached Housing									
Trip Generation³	1.00 DU	9	0	1	1	1	0	1	
Net Trip Generation			123	10	1	11	2	11	13
Net PCE Trip Generation			205	15	2	17	3	16	19

TSF = Thousand Square Feet

PCE = Passenger Car Equivalent

¹ Trip rates/Percentages from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 150 - Warehousing.

² Trip rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 180 - Specialty Trade Contractor.

³ Trip rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 210 - Single Family Detached Housing.

⁴ ITE Vehicle Mix for Warehousing

⁵ SCAQMD Warehouse Truck Study Fleet Mix (Without Cold Storage).

⁶ Passenger Car Equivalent (PCE) factors from County of Riverside Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled, dated December 2020.

Figure 2: WRCOG VMT Screening Tool Inputs and Results

<p>#2. Select the VMT Metric. 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.*</p> <p>PA VMT Per Worker</p>	OBJECTID	1	OBJECTID	2
	Assessor Parcel Number (APN)	314170009	Assessor Parcel Number (APN)	314170010
<p>#3. Select the Baseline Year. The year available for analysis are from 2018 to 2045.*</p> <p>2022</p>	Traffic Analysis Zone (TAZ)	1872	Traffic Analysis Zone (TAZ)	1872
	Community Region	PERRIS	Community Region	PERRIS
<p>#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.*</p> <p>Below City Baseline (0%)</p>	Inside a Transit Priority Area (TPA)	No	Inside a Transit Priority Area (TPA)	No
	TAZ VMT	17.5	TAZ VMT	17.5
	Jurisdiction VMT	16.9	Jurisdiction VMT	16.9
	% Difference	3.22%	% Difference	3.22%
	VMT Metric	PA VMT Per Worker	VMT Metric	PA VMT Per Worker
	Threshold	16.9	Threshold	16.9

ATTACHMENT A – VMT SCOPING FORM



**CITY OF PERRIS
VMT SCOPING FORM FOR LAND USE PROJECTS**

This Scoping Form acknowledges the City of Perris requirements for the evaluation of transportation impacts under CEQA. The analysis provided in this form should follow the City of Perris TIA Guidelines, dated May 12, 2020.

I. Project Description

Tract/Case No.

Project Name:

Project Location:

Project Description:
(Please attach a copy of the project Site Plan)

Current GP Land Use:

Proposed GP Land Use:

Current Zoning:

Proposed Zoning:

If a project requires a General Plan Amendment or Zone change, then additional information and analysis should be provided to ensure the project is consistent with RHNA and RTP/SCS Strategies.

II. VMT Screening Criteria

- A. Is the Project 100% affordable housing?

YES		NO	X
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 Attachments:
- B. Is the Project within 1/2 mile of qualifying transit?

YES		NO	X
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 Attachments:
- C. Is the Project a local serving land use?

YES		NO	X
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 Attachments:
- D. Is the Project in a low VMT area?

YES		NO	X
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 Attachments:
- E. Are the Project's Net Daily Trips less than 500 ADT?

YES	X	NO	
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 Attachments:

Low VMT Area Evaluation:

Citywide VMT Averages ¹	
Citywide Home-Based VMT =	15.05 VMT/Capita
Citywide Employment-Based VMT =	11.62 VMT/Employee



Project TAZ	VMT Rate for Project TAZ ¹	Type of Project	
3574	13.42 VMT/Capita	Residential:	
	12.19 VMT/Employee	Non-Residential:	X

¹ Base year (2012) projections from RIVTAM.

Trip Generation Evaluation:

Source of Trip Generation:

Project Trip Generation:

152

 Average Daily Trips (ADT)

Internal Trip Credit:	YES	<input type="text"/>	NO	<input checked="" type="checkbox"/>	% Trip Credit:	<input type="text"/>
Pass-By Trip Credit:	YES	<input type="text"/>	NO	<input checked="" type="checkbox"/>	% Trip Credit:	<input type="text"/>
Affordable Housing Credit:	YES	<input type="text"/>	NO	<input checked="" type="checkbox"/>	% Trip Credit:	<input type="text"/>
Existing Land Use Trip Credit:	YES	<input checked="" type="checkbox"/>	NO	<input type="text"/>	Trip Credit:	<input type="text" value="29"/>

Net Project Daily Trips:

123

 Average Daily Trips (ADT) Attachments:

Does project trip generation warrant an LOS evaluation outside of CEQA?

YES

NO

X

III. VMT Screening Summary

A. Is the Project presumed to have a less than significant impact on VMT?

A Project is presumed to have a less than significant impact on VMT if the Project satisfies at least one (1) of the VMT screening criteria.

Less Than Significant

B. Is mitigation required?

If the Project does not satisfy at least one (1) of the VMT screening criteria, then mitigation is required to reduce the Project's impact on VMT.

No Mitigation Required

C. Is additional VMT modeling required to evaluate Project impacts?

If the Project requires a zone change and/or General Plan Amendment AND generates 2,500 or more net daily trips, then additional VMT modeling using RIVTAM/RIVCOM is required. If the project generates less than 2,500 net daily trips, the Project TAZ VMT Rate can be used for mitigation purposes.

YES		NO	X
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IV. MITIGATION

A. Citywide Average VMT Rate (Threshold of Significance) for Mitigation Purposes:

N/A	N/A
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B. Unmitigated Project TAZ VMT Rate:

N/A	N/A
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C. Percentage Reduction Required to Achieve the Citywide Average VMT:

N/A

D. VMT Reduction Mitigation Measures:

Source of VMT Reduction Estimates:

Project Location Setting

	VMT Reduction Mitigation Measure:	Estimated VMT Reduction (%)
1.		0.00%
2.		0.00%
3.		0.00%
4.		0.00%
5.		0.00%
6.		0.00%
7.		0.00%
8.		0.00%
9.		0.00%
10.		0.00%
Total VMT Reduction (%)		0.00%

(Attach additional pages, if necessary, and a copy of all mitigation calculations.)

E. Mitigated Project TAZ VMT Rate:

N/A	N/A
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F. Is the project presumed to have a less than significant impact with mitigation?

N/A

If the mitigated Project VMT rate is below the Citywide Average Rate, then the Project is presumed to have a less than significant impact with mitigation. If the answer is no, then additional VMT modeling may be required and a potentially significant and unavoidable impact may occur. All mitigation measures identified in Section IV.D. are subject to become Conditions of Approval of the project. Development review and processing fees should be submitted with, or prior to the submittal of this Form. The Planning Department staff will not process the Form prior to fees being paid to the City.

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Approved by:			

Perris Planning Division	Date	Perris City Engineer	Date