

March 24, 2023

Ms. Tina Anderson  
 T&B Planning Inc.  
 3200 El Camino Real, Suite 100  
 Irvine, CA 92602

**PATTERSON COMMERCE CENTER (DPR22-00003) VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION (REVISED)**

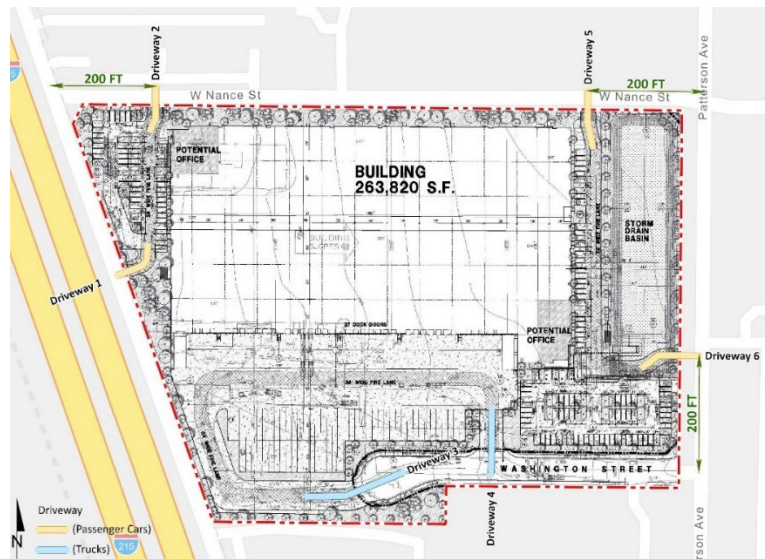
Ms. Tina Anderson,

Urban Crossroads, Inc. is pleased to provide the following Vehicle Miles Traveled (VMT) Screening Evaluation for the Patterson Commerce Center (DPR22-00003) development (**Project**), which is proposed for a site located on the southwest corner of Patterson Avenue and Nance Street in the City of Perris' *Perris Valley Commerce Center Specific Plan (PVCC SP)*.

**PROJECT OVERVIEW**

It is our understanding that the Project is to consist of a single 263,820-square-foot (sf) warehouse building which will be evaluated assuming 237,438 square feet of high-cube fulfillment center warehouse use (90% of the total square footage) and 26,382 square feet of manufacturing use (10% of the total square footage). A preliminary site plan for the proposed Project is shown on Exhibit 1.

**EXHIBIT 1: PRELIMINARY SITE PLAN**



## **BACKGROUND**

Changes to the California Environmental Quality Act (**CEQA**) Guidelines were adopted in December 2018, which requires all lead agencies to adopt VMT as a replacement for automobile delay based on level of service (**LOS**) as the new measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (**OPR**) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018) (**Technical Advisory**) (1). Based on OPR's Technical Advisory, the City of Perris adopted its Transportation Impact Analysis Guidelines for CEQA (May 2020) (**City Guidelines**) (2). The adopted City Guidelines have been utilized to prepare this VMT analysis.

## **VMT SCREENING**

As the City Guidelines describe, the first step in evaluating a land use project's VMT impact is to perform an initial screening assessment utilizing the City of Perris VMT Scoping Form for Land Use Projects (**Scoping Form**). The Scoping Form provides an easy to use tool for VMT analysis.

The City Guidelines list standardized screening methods for project level VMT analysis that can be used to identify when a proposed land use development project is anticipated to result in a less than significant impact, thereby eliminating the need to conduct additional VMT analysis. City of Perris VMT screening methods, as described within the City Guidelines, are as follows:

- Affordable Housing
- High Quality Transit Areas (**HQTA**) Screening
- Local-Serving Land Use
- Low VMT Area
- Net Daily Trips Less than 500 ADT

As stated by the City Guidelines, land use projects need only meet one of the above screening criteria to result in a less than significant impact.

## **AFFORDABLE HOUSING**

The City Guidelines state that 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. The Project does not include any residential uses.

**Affordable Housing screening criteria not met.**

## **HIGH QUALITY TRANSIT AREAS (HQTA) SCREENING**

Consistent with guidance identified in the City Guidelines, projects located within a Transit Priority Area (**TPA**) (i.e., within ½ mile of an existing "major transit stop"<sup>1</sup>) or an existing stop along a "high-

---

<sup>1</sup> 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.").

quality transit corridor”<sup>2</sup>) may be presumed to have a less than significant impact absent substantial evidence to the contrary. 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.

Based on the Western Riverside Councils of Governments (**WRCOG**) Screening Tool results presented in Attachment A, the Project site is not located within ½ mile of an existing major transit stop or along a high-quality transit corridor (See Attachment A).

**HQTA screening criteria is not met.**

### **LOCAL-SERVING LAND USE**

As identified in the City 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. By improving destination proximity, local serving uses lead to shortened trip lengths and reduced VMT. The City Guidelines provides a list of applicable local serving retail categories below 50,000 square feet. The Project does not include any local serving retail/essential-service land uses.

**Local-Serving Land Use screening criteria is not met.**

### **LOW VMT AREA SCREENING**

The City Guidelines states, “Projects that locate 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.” The City of Perris utilizes its own VMT scoping form to identify areas of low VMT. The scoping form uses the sub-regional Riverside County Transportation Analysis Model (**RIVTAM**) to measure VMT performance within individual traffic analysis zones (**TAZs**) within the WRCOG region. The Project’s physical location based on the WRCOG web-based screening tool is used to determine the TAZ in which the Project resides. The TAZ identification number is then selected within the scoping form. Finally, the VMT generated by the existing TAZ as compared to the City’s impact threshold of “VMT per employee that is less than or equal to the Citywide average.” The TAZ containing the proposed Project was selected, and the scoping form identified VMT per employee. Based on the scoping form results, the Project is located in TAZ 3754, and the

---

<sup>2</sup> 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.”).

VMT per employee is 12.19. The City of Perris citywide VMT per employee average is 11.62. Therefore, the Project does not reside within a low VMT generating zone (See Attachment B).

**Low VMT Area screening criteria is not met.**

### **NET DAILY TRIPS LESS THAN 500 ADT**

The City Guidelines state that projects that generate a net increase of less than 500 average daily trips (**ADT**) would not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT. Trips generated by the Project's proposed land uses have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11<sup>th</sup> Edition, 2021 (3). The Project is anticipated to generate a net increase of 492 ADT compared to the trip generation from onsite uses that were operating at the Project site when traffic counts were taken at the Project site on December 1 and 2, 2021. Therefore, the Project would generate a net increase in daily vehicle trips below the 500 daily vehicle trip threshold (See Attachment C).

**Net Daily Trips Less than 500 ADT screening criteria is met.**

### **CONCLUSION**

In summary, the Project was evaluated against the City's applicable VMT screening steps. The Project was found to meet the Net Daily Trips Less than 500 ADT screening criteria. Thus, the VMT impact is presumed to be less than significant; no further VMT analysis is required.

If you have any questions, please contact me directly at [aso@urbanxroads.com](mailto:aso@urbanxroads.com).

Respectfully submitted,

URBAN CROSSROADS, INC.



Alexander So  
Senior Associate



Charlene So, PE  
Principal



## REFERENCES

1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
2. **City of Perris.** *Transportation Analysis Guidelines for CEQA.* City of Perris : s.n., May 2020.
3. **Institute of Transportation Engineers.** *Trip Generation Manual.* 11th Edition. 2021.

**ATTACHMENT A**  
**WRCOG SCREENING TOOL**

**WRCOG VMT Screening Tool**

W Nance St & Patterson Ave, Pe X

Show search results for W Nance St &...

**VMT Impact Screening**

Input    Output

Zoom in to your project location close enough that the blue parcel layer appears. Select Western Riverside County Parcels in the drop-down below, then use the black square to select your project parcels. When ready, click on the Execute button. To clear the selection or start over, click on the "X" on the output tab once the tool has run. All results based on RIVTAM Model\*

Western Riverside County Parcels...

[Help](#)    **Execute**

(1 of 2)

**APN:314110045; TAZ:3,754**

**Within a Transit Priority Area (TPA)?**  
No (Fail)

**Within a low VMT generating TAZ based on Total VMT?**  
No (Fail)  
Jurisdictional average 2012 daily total VMT per service population = 27.59  
Project TAZ 2012 daily total VMT per service population = 62.64

**Within a low VMT generating TAZ based on Residential Home-Based VMT?**  
Yes (Pass)  
Jurisdictional average 2012 daily residential home-based VMT per capita = 15.05  
Project TAZ 2012 daily residential home-based VMT per capita = 13.42

**Within a low VMT generating TAZ based on Zoom to**    ...

**Layer List**

All results based on RIVTAM Model.

- Output Layer
- Western Riverside County Parcels (Zoom in to view)
- Transit Priority Area
- RIVTAM TAZs with total VMT per service population below jurisdictional average under 2012 base year model
- RIVTAM TAZs with Home-based VMT per resident below jurisdictional average under 2012 base year model
- RIVTAM TAZs with Home-based work VMT per worker below jurisdictional average under 2012 base year model
- RIVTAM TAZs with total VMT per service population below WRCOG subregional average under 2012 base year model
- RIVTAM TAZs with Home-based VMT per resident below WRCOG subregional average under 2012 base year model
- RIVTAM TAZs with Home-based work VMT per worker below WRCOG subregional average under 2012 base year model
- City Boundaries
- TUMF Zone Boundaries

300ft

-117.254 33.859 Degrees

Community Maps Contributors, Loma Linda

**ATTACHMENT B**  
**PERRIS 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
-----	--	----	---

 Attachments:

B. Is the Project within 1/2 mile of qualifying transit? 

YES		NO	X
-----	--	----	---

 Attachments:

C. Is the Project a local serving land use? 

YES		NO	X
-----	--	----	---

 Attachments:

D. Is the Project in a low VMT area? 

YES		NO	X
-----	--	----	---

 Attachments:

E. Are the Project's Net Daily Trips less than 500 ADT? 

YES	X	NO	
-----	---	----	--

 Attachments:

**Low VMT Area Evaluation:**

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

[WRCOG VMT MAP](#)

Project TAZ	VMT Rate for Project TAZ <sup>1</sup>		Type of Project	
3754	13.42	VMT/Capita	Residential:	
	12.19	VMT/Employee	Non-Residential:	X

<sup>1</sup> Base year (2012) projections from RIVTAM.

**Trip Generation Evaluation:**

Source of Trip Generation:

Project Trip Generation: 

632	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="140"/>

Net Project Daily Trips: 

492	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?**

YES		NO	X
-----	--	----	---

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.

**IV. MITIGATION**

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

N/A	N/A
-----	-----

**B. Unmitigated Project TAZ VMT Rate:**

N/A	N/A
-----	-----

**C. Percentage Reduction Required to Achieve the Citywide Average VMT:**

N/A
-----

**D. VMT Reduction Mitigation Measures:**

<b>Source of VMT Reduction Estimates:</b>	CAPCOA
---	--------

<b>Project Location Setting</b>	Suburban
---------------------------------	----------

	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%
<b>Total VMT Reduction (%)</b>		<b>0.00%</b>

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

**E. Mitigated Project TAZ VMT Rate:**

N/A	N/A
-----	-----

**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.

Prepared By		Developer/Applicant	
<b>Company:</b>	Urban Crossroads, Inc.	<b>Company:</b>	Rockefeller Group
<b>Contact:</b>	Charlene So	<b>Contact:</b>	Mark Carpenter
<b>Address:</b>	1133 Camelback St. #8329, Newport Beach, CA	<b>Address:</b>	3161 Michelson Dr., Suite 900, Irvine, CA
<b>Phone:</b>	949-861-0177	<b>Phone:</b>	949-468-1801
<b>Email:</b>	cso@urbanxroads.com	<b>Email:</b>	
<b>Date:</b>	10/5/2022	<b>Date:</b>	10/5/2022
<b>Approved by:</b>			
<b>Perris Planning Division</b>	<b>Date</b>	<b>Perris City Engineer</b>	<b>Date</b>

**ATTACHMENT C**  
**PROJECT TRIP GENERATION**

The entire Project site is disturbed. With the exception of the vacant parcel in the northwest portion of the Project site (4585 Wade Avenue; approximately 0.78 acres), GRFCO owned and occupied the Project site between 1984 and 2022, and vacated the site with the purchase of the property by RG Patterson, LLC (herein **Project Applicant**) on July 14, 2022. GRFCO operated a staging yard for a construction company, conducted concrete crushing and recycling, and conducted fleet maintenance and equipment washing onsite. When the environmental analysis commenced in late 2021, the southwest portion of the Project site (including former residential structures) was occupied by GRFCO, and GRFCO leased the eastern and northern portions of the Project site for truck trailer storage (starting in 2018). GRFCO vacated the site in July 2022 due to the sale and pending Project. At that time, the truck trailer storage operator entered into a lease agreement with the Project Applicant for the entire site. The property is currently leased month-to-month by the trailer storage operator and that lease will terminate upon receipt of entitlements. The foundation from a previous portable structure remains at the northwest corner of the site; this area has been vacant since 2020. For purposes of the analysis in this report, the baseline condition reflects the operation of various industrial uses at the Project site, which occurred consistently for approximately 40 years and were ongoing when the environmental analysis for the Project commenced in late 2021, including when traffic counts were taken at the Project site driveway on December 1 and 2, 2021. A summary of the count data collected is shown on Table 1.

**TABLE 1: SUMMARY OF EXISTING DRIVEWAY COUNTS**

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Day 1: December 1, 2021							
Passenger Cars:	2	3	5	2	4	6	79
2-axle Trucks:	0	0	0	0	0	0	4
3-axle Trucks:	1	0	1	0	0	0	39
4+-axle Trucks:	0	2	2	0	0	0	30
Total Truck Trips:	1	2	3	0	0	0	73
<b>Total Trips<sup>1</sup></b>	<b>3</b>	<b>5</b>	<b>8</b>	<b>2</b>	<b>4</b>	<b>6</b>	<b>152</b>
Day 2: December 2, 2021							
Passenger Cars:	4	3	7	1	4	5	68
2-axle Trucks:	0	0	0	0	0	0	8
3-axle Trucks:	0	0	0	0	0	0	25
4+-axle Trucks:	0	0	0	1	1	2	26
Total Truck Trips:	0	0	0	1	1	2	59
<b>Total Trips<sup>1</sup></b>	<b>4</b>	<b>3</b>	<b>7</b>	<b>2</b>	<b>5</b>	<b>7</b>	<b>127</b>

\* Note: data collected on December 1 and 2, 2021.

<sup>1</sup> Total Trips = Passenger Cars + Total Truck Trips.

**TABLE 2: EXISTING TRIP GENERATION SUMMARY**

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Actual Vehicles:							
Existing Use							
Passenger Cars:	3	3	6	1	4	5	74
2-axle Trucks:	0	0	0	0	0	0	6
3-axle Trucks:	1	0	1	0	0	0	32
4+-axle Trucks:	0	1	1	1	1	2	28
Total Trucks:	1	1	2	1	1	2	66
<b>Total Trips (Actual Vehicles)<sup>2</sup></b>	<b>4</b>	<b>4</b>	<b>8</b>	<b>2</b>	<b>5</b>	<b>7</b>	<b>140</b>

<sup>1</sup> AC = Acres

<sup>2</sup> Total Trips = Passenger Cars + Truck Trips.

**TABLE 3: TRIP GENERATION RATES**

Land Use	Units <sup>2</sup>	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Actual Vehicle Trip Generation Rates									
Manufacturing <sup>3</sup>	TSF	140	0.517	0.163	0.680	0.229	0.511	0.740	4.750
Passenger Cars (AM=95.6%, PM=95.9%, Daily=90.5%)			0.500	0.150	0.650	0.217	0.493	0.710	4.300
2-Axle Trucks (AM=0.74%, PM=0.69%, Daily=1.59%)			0.003	0.002	0.005	0.002	0.003	0.005	0.075
3-Axle Trucks (AM=0.91%, PM=0.85%, Daily=1.97%)			0.003	0.003	0.006	0.003	0.004	0.006	0.093
4+-Axle Trucks (AM=3.73%, PM=2.56%, Daily=5.94%)			0.011	0.008	0.019	0.008	0.011	0.019	0.282
High-Cube Fulfillment Center Warehouse <sup>4</sup>	TSF	--	0.089	0.033	0.122	0.050	0.115	0.165	2.129
Passenger Cars (AM=84.4%, PM=87.3%, Daily=82.2%)			0.079	0.024	0.103	0.040	0.104	0.144	1.750
2-4 Axle Trucks (AM=6.6%, PM=6.7%, Daily=7.6%)			0.004	0.004	0.008	0.005	0.006	0.011	0.162
5+-Axle Trucks (AM=9.0%, PM=6.0%, Daily=10.2%)			0.005	0.006	0.011	0.005	0.005	0.010	0.217

<sup>1</sup> Trip Generation & Vehicle Mix Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

<sup>2</sup> TSF = thousand square feet

<sup>3</sup> Truck Mix: South Coast Air Quality Management District's (SCAQMD) recommended truck mix, by axle type.

Normalized % - Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks.

<sup>4</sup> Vehicle Mix Source: High Cube Warehouse Trip Generation Study, WSP, January 29, 2019.

Inbound and outbound split source: ITE Trip Generation Manual, Eleventh Edition (2021) for ITE Land Use Code 154.

**TABLE 4: PROJECT TRIP GENERATION SUMMARY**

Land Use	Quantity Units <sup>1</sup>	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
<b>Actual Vehicles:</b>								
Manufacturing	26.382 TSF							
Passenger Cars:		17	2	19	2	15	17	122
2-axle Trucks:		0	0	0	0	0	0	2
3-axle Trucks:		0	0	0	0	0	0	2
4+-axle Trucks:		0	0	0	0	0	0	4
Total Truck Trips (Actual Vehicles):		0	0	0	0	0	0	8
Manufacturing Trips (Actual Vehicles) <sup>2</sup>		17	2	19	2	15	17	130
<b>High-Cube Fulfillment</b>								
High-Cube Fulfillment	237.438 TSF							
Passenger Cars:		19	6	25	10	25	35	416
2-4axle Trucks:		1	1	2	1	1	2	38
5+-axle Trucks:		1	1	2	1	1	2	52
Total Truck Trips (Actual Vehicles):		2	2	4	2	2	4	90
Fulfillment Trips (Actual Vehicles) <sup>2</sup>		21	8	29	12	27	39	506
Passenger Cars		36	8	44	12	40	52	538
Trucks		2	2	4	2	2	4	98
<b>Total Project Trips (Actual Vehicles)<sup>2</sup></b>		<b>38</b>	<b>10</b>	<b>48</b>	<b>14</b>	<b>42</b>	<b>56</b>	<b>636</b>

<sup>1</sup> TSF = thousand square feet

<sup>2</sup> Total Trips = Passenger Cars + Truck Trips.

**TABLE 5: TRIP GENERATION COMPARISON**

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
<b>Actual Vehicles:</b>							
<b>Existing Use</b>							
Passenger Cars:	3	3	6	1	4	5	74
Trucks:	1	1	2	1	1	2	66
Existing Trips (Actual Vehicles) <sup>2</sup>	4	4	8	2	5	7	140
<b>Proposed Project</b>							
Passenger Cars:	32	10	42	16	38	54	530
Trucks:	2	2	4	2	2	4	102
Total Project Trips (Actual Vehicles) <sup>2</sup>	34	12	46	18	40	58	632
Passenger Cars:	29	7	36	15	34	49	456
Trucks:	1	1	2	1	2	3	36
<b>Net New Project Trips (Actual Vehicles)<sup>2</sup></b>	<b>30</b>	<b>8</b>	<b>38</b>	<b>16</b>	<b>36</b>	<b>52</b>	<b>492</b>

<sup>1</sup> TSF = thousand square feet

<sup>2</sup> Total Trips = Passenger Cars + Truck Trips.