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PERRIS TRUCK TERMINAL (CUP 22-05172) VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION

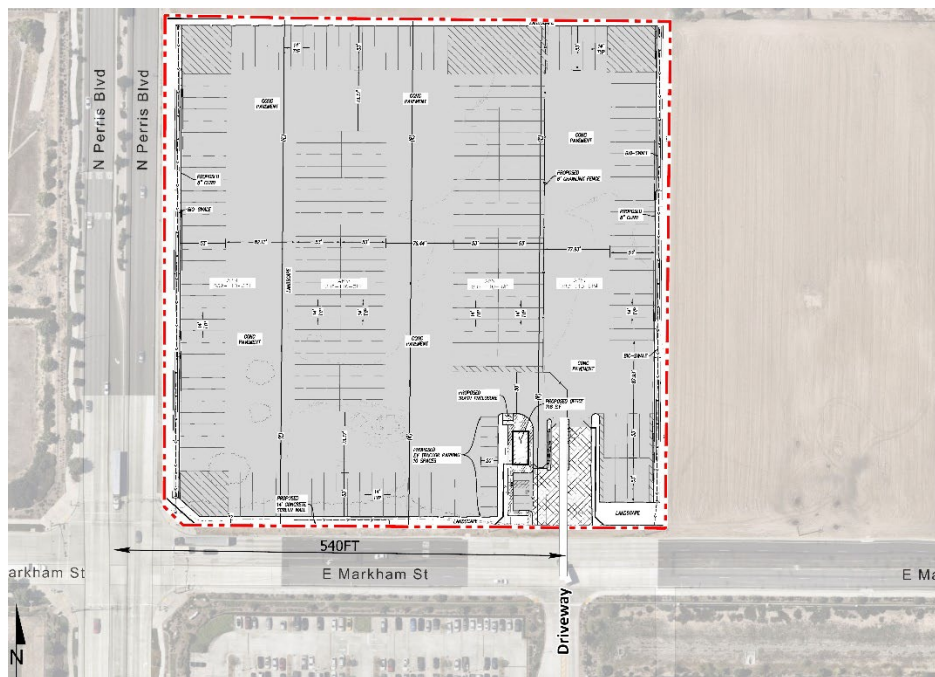
Ms. Cheryl A. Tubbs,

Urban Crossroads, Inc. is pleased to provide the following Vehicle Miles Traveled (VMT) Screening Evaluation for the Perris Truck Terminal development (**Project**), which is located north of Markham Street and east of Perris Boulevard in the City of Perris, within the City's Perris Valley Commerce Center Specific Plan (PVCC SP).

PROJECT OVERVIEW

The Project applicant is proposing to develop a truck trailer drop lot on 8.57-gross acres with one 718-square-foot office. The site will accommodate 205 14-foot by 53-foot trailer parking stalls, 11 EV truck stalls, 3 passenger car parking spaces, and one accessible parking space. A preliminary site plan for the proposed Project is shown on Exhibit 1.

EXHIBIT 1: PRELIMINARY SITE PLAN



BACKGROUND

Changes to the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) were adopted in December 2018, which requires all lead agencies to adopt VMT as a replacement for automobile delay-based 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 their 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 streamlining the VMT analysis process.

City's 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. The City of Perris VMT screening methods, as described within the City Guidelines, are listed below:

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

As stated in the City Guidelines, mixed use land use projects should be evaluated by their individual land use components. These land use components need only meet one of the above screening criteria to result in a less than significant impact.

AFFORDABLE HOUSING

The City Guidelines state, 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 intend to develop 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”¹ or an existing stop along a “high-quality transit corridor”²) 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.

The City Guidelines provides a map of HQTA areas within the City of Perris. The Project is located within ½ mile of Perris Blvd. However, further review of the secondary criteria shows the Project does not qualify for HQTA screening.

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 proposed Project is anticipated to provide overflow or excess trailer parking for nearby warehouses and distribution centers. It is reasonable to assume that the future tenant will select a location, at least in part, as to how it effects their transportation costs. Businesses who have shipping as a significant part of their operations are sensitive to transportation costs and by extension their relative proximity to customers and suppliers. Therefore, the proposed truck storage lot is anticipated to serve nearby warehouses and distribution facilities that would be seeking to locate overflow truck/trailer storage as close as possible to the primary warehouse or distribution facility. As a result, the trips are expected to be local serving.

Local-Serving Land Use screening criteria is met.

¹ 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.”).

² 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.”).

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." It is our understanding that 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 (TAZ's) within the Western Riverside Councils of Governments (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 located in TAZ 3821 and the VMT per employee is 11.26. Whereas the City of Perris citywide VMT average is 11.62. Therefore, the Project does reside within a low VMT generating zone (See Attachment A).

Low VMT Area screening criteria is met.

NET DAILY TRIPS LESS THAN 500 ADT

The City Guidelines identify projects that generate 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. The Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, 2021 (3) does not currently have any trip generation rates for a truck yard, as such, trip generation estimates for the proposed Project have been developed using data collected at two other facilities with operations similar to those proposed. Table 1 summarizes the count data collected at the facility.

TABLE 1: EXISTING EMPIRICAL DATA

Existing Site	Quantity Units ¹	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Trip Generation Summary of Existing Uses:								
5087 Patterson Avenue, Perris ²	4.500 AC							
Passenger Cars:		0	2	2	1	1	2	38
2-axle Trucks:		0	0	0	3	0	3	36
3-axle Trucks:		1	5	6	1	0	1	38
4+-axle Trucks:		1	0	1	0	3	3	58
Total Trucks (Actual Vehicles)		2	5	7	4	3	7	132
5087 Patterson Av. Total Trips (Actual Vehicles)		2	7	9	5	4	9	170
1938 5th Street, San Bernardino ³	6.300 AC							
Passenger Cars:		0	0	0	4	3	7	99
2-axle Trucks:		1	1	2	0	0	0	4
3-axle Trucks:		2	3	5	3	3	6	85
4+-axle Trucks:		1	4	5	7	1	8	115
Total Trucks (Actual Vehicles)		4	8	12	10	4	14	204
1938 5th St. Total Trips (Actual Vehicles)		4	8	12	14	7	21	303

¹ AC = Acres (Total acreage of site)

² Data presented based on driveway counts conducted on January 23, 2019.

³ Data presented based on driveway counts conducted on February 8, 2022.

PROPOSED PROJECT TRIP GENERATION

Table 2 shows the trip generation rates for the existing facility which have been developed based on both the number of truck parking stalls and acreage using the data collected at the site shown on Table 2. The trip generation rates were calculated by dividing the trips by either the acreage or total number of truck parking stalls.

TABLE 2: CALCULATED TRIP GENERATION RATES

Land Use	Units ²	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Actual Vehicles:								
Trailer Yard	AC							
Passenger Cars:		0.000	0.185	0.185	0.463	0.370	0.833	12.685
2-axle Trucks:		0.093	0.093	0.185	0.278	0.000	0.278	3.704
3-axle Trucks:		0.278	0.741	1.019	0.370	0.278	0.648	11.389
4+-axle Trucks:		0.185	0.370	0.556	0.648	0.370	1.019	16.019

¹ Weighted average trip generation rate developed from empirical data summarized on Table 2.

² AC = Acres (Total acreage of site)

Based on the calculated trip generation rates shown on Table 2, the Project's trip generation is summarized on Table 3. The proposed Project trip generation is based on the anticipated operations for the site. As shown on Table 3, the Project is anticipated to generate a total of 284 vehicle trip-ends per day.

TABLE 3: PROJECT TRIP GENERATION SUMMARY

Land Use	Quantity Units ¹	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Actual Vehicles								
Trailer Yard	8.570 AC							
Passenger Cars:		0	2	2	4	3	7	110
2-axle Trucks:		1	1	2	2	0	2	32
3-axle Trucks:		2	6	8	3	2	5	98
4+-axle Trucks:		2	3	5	6	3	9	138
Total Trucks (Actual Vehicles)		5	10	15	11	5	16	268
Total Project Trips (Actual Vehicles)		5	12	17	15	8	23	378

As the Project is anticipated to generate 378 daily vehicle trip-ends per day. Therefore, the Project generate daily vehicle trips exceeding the 500 daily vehicle trip threshold.

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

CONCLUSION

In summary, the Project meets Local-Serving Land Use, Low VMT Area, and Net Daily Trips less than 500 ADT screening criteria. As such, the Project's VMT impact is less than significant; no additional VMT analysis is required.

If you have any questions, please contact me directly at 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
CITY OF PERRIS 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? | <input type="checkbox" value="YES"/> | <input type="checkbox" value="NO"/> | <input checked="" type="checkbox" value="X"/> | Attachments: <input type="text"/> |
| B. Is the Project within 1/2 mile of qualifying transit? | <input type="checkbox" value="YES"/> | <input checked="" type="checkbox" value="X"/> | <input type="checkbox" value="NO"/> | Attachments: <input type="text"/> |
| C. Is the Project a local serving land use? | <input type="checkbox" value="YES"/> | <input checked="" type="checkbox" value="X"/> | <input type="checkbox" value="NO"/> | Attachments: <input type="text"/> |
| D. Is the Project in a low VMT area? | <input type="checkbox" value="YES"/> | <input checked="" type="checkbox" value="X"/> | <input type="checkbox" value="NO"/> | Attachments: <input type="text"/> |
| E. Are the Project's Net Daily Trips less than 500 ADT? | <input type="checkbox" value="YES"/> | <input checked="" type="checkbox" value="X"/> | <input type="checkbox" value="NO"/> | Attachments: <input type="text"/> |

Low VMT Area Evaluation:

Citywide VMT Averages ¹		
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 ¹	Type of Project	
3821	13.39 VMT/Capita	Residential:	<input type="checkbox"/>
	11.26 VMT/Employee	Non-Residential:	<input checked="" type="checkbox" value="X"/>

¹ Base year (2012) projections from RIVTAM.

Trip Generation Evaluation:

Source of Trip Generation:

Project Trip Generation: Average Daily Trips (ADT)

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

Net Project Daily Trips: Average Daily Trips (ADT) Attachments:

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

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
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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
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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:	CAPCOA
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Project Location Setting	Suburban
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	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