

ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

Date: May 5, 2021
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To: Gloria Loofbourrow, Project Manager
Lord Constructors
Site: BCWR Cajon LLC Kendall Drive Trailer Storage Lot
(EPD Project Number 21-066)
Subject: Trip Generation and VMT Screening Analysis

The proposed Kendall Drive Trailer Storage project proposes the construction of a 209-stall trailer storage lot on a 7.17-acre site. The project is located on the southwest side of Kendall Drive, and is bounded by Kendall Drive, Cajon Boulevard and the BNSF Railroad tracks in unincorporated San Bernardino County. The project site plan is attached. EPD has prepared an analysis of the project trip generation and a vehicle miles traveled (VMT) screening analysis to determine if a LOS-based traffic analysis or VMT analysis would be required for the project.

Project Trip Generation

Land use projects are generally evaluated using trip rates from the Institute of Transportation Engineers, *Trip Generation*, 10th Edition, 2017. However, *Trip Generation* does not provide trip generation rates for trailer storage lots. During coordination on a previous project, County staff provided EPD with survey data for trailer storage lots in Long Beach and Compton, California. These trip rates have been used on other trailer storage lot projects in the project area and are therefore utilized for this analysis.

The project trip generation has been calculated using the trip rates provided by the County and accounts for heavy vehicles through the application of passenger car equivalent (PCE) factors for truck trips. The project trip generation is shown in Table 1 (attached). The trip generation rates include data from the following four trailer storage lots:

- 1450 W. Dominguez Street, Long Beach, CA, 161 Trailer Parking Spaces (TPS)
- 21900 S. Alameda Street, Long Beach, CA, 176 TPS
- 2201 S. Santa Fe Avenue, Compton, CA, 181 TPS
- 1601 S. Anderson Avenue, Compton, CA, 183 TPS

The lot at 21900 S. Alameda Street is the most like the proposed project as it has a similar, although slightly lower, number of trailer parking spaces and the only building on-site is a guard shack. This lot had the lowest overall trip generation rate per TPS but had the highest percentage of 3 and 4+-axle trucks. The trip generation analysis has been prepared using the average trip rates for all four sites, which is higher than the 21900 S. Alameda Street lot. However, the vehicle mix from the 21900 S. Alameda Street lot is used, as the lot characteristics are most similar to the proposed project. These assumptions result in a

higher overall trip generation than application of the average trip rates and average vehicle mix together.

As shown in Table 1, the project is expected to generate 575 daily trips including 40 trips during the AM peak hour and 42 trips during the PM peak hour. When a passenger car equivalent (PCE) factor is applied to the trip generation to account for heavy vehicles, the project would generate 1,339 daily PCE trips, including 93 PCE trips during the AM peak hour and 98 PCE trips during the PM peak hour.

The County of San Bernardino Transportation Impact Study Guidelines indicates projects that generate 100 or more trips during any peak hour have the potential to create a traffic impact and would be required to prepare a TIS. Based on the maximum peak hour trip generation of 42 trips (98 PCE trips) during the PM peak hour, the project should not be required to prepare a Traffic Impact Assessment (TIA).

Vehicle Miles Traveled

Background

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.

VMT Screening Analysis

The San Bernardino County Transportation Impact Study Guidelines (July 19, 2019) provide VMT analysis methodology, impact thresholds and screening thresholds to determine if projects would require a vehicle miles traveled (VMT) analysis. The TIS Guidelines provide criteria for projects that would be considered to have a less-than significant impact on VMT and therefore could be screened out from further 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:

- The project serves the local community and thereby has the potential to reduce VMT.
- The project generates less than 110 daily vehicle trips.
- The project is located within a Transit Priority area.
- The project is located in a low VMT generating area.

The project would not be considered a local-serving use, as defined in the guidelines. The project is also not located in either a Transit Priority Area or a low VMT generating area.

The County's TIS Guidelines discuss the type of VMT that should be evaluated for various types of projects. For employment projects, such as the proposed project, the County guidelines specify that VMT/Employee for only the home-based-work trip purpose is analyzed. This is consistent with CEQA Guidelines Section 15064.3(a) which states "For the purpose of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project". Based on both of these guidance documents, truck trips are not included in the VMT analysis.

To determine if the project's trip generation would exceed the 110 daily vehicle trips screening threshold, the passenger vehicle trip generation was utilized. This approach is consistent with both the County and CEQA Guidelines. As shown in Table 1, the project would generate 93 daily passenger vehicle trips, based on surveys of similar sites in Los Angeles County. The proposed project would only have one security employee present on-site and there are only two proposed passenger-vehicle parking spaces. It is likely that fewer than 93 daily passenger vehicle trips would be generated due to the low number of employees and parking spaces for passenger vehicles. Because the project would generate fewer than 110 daily passenger vehicle trips, the project is presumed to have a less than significant impact on VMT and would not require further VMT analysis.

If you have any questions about this information, please contact me at (949) 794-1186 or meghan@epdsolutions.com.

Table 1. Kendall Drive Trailer Storage Lot Trip Generation

Land Use	Units	AM Peak Hour			PM Peak Hour				
		Daily	In	Out	Total	In	Out	Total	
<u>Trip Rates</u>									
Truck-Trailer Parking Lot ¹	TPS	2.75	0.08	0.11	0.19	0.09	0.11	0.20	
<u>Total Vehicle Trip Generation</u>									
Kendall Drive Trailer Storage Lot	209 TPS	575	17	23	40	19	23	42	
<u>Vehicle Mix¹</u>		<u>Percent²</u>							
Passenger Vehicles	16.20%	93	3	4	6	3	4	7	
2-Axle Trucks	2.90%	17	0	1	1	1	1	1	
3-Axle Trucks	30.40%	175	5	7	12	6	7	13	
4+-Axle Trucks	50.50%	290	9	12	20	10	12	21	
	100%	575	17	23	40	19	23	42	
<u>PCE Trip Generation³</u>		<u>PCE Factor</u>							
Passenger Vehicles	1.0	93	3	4	6	3	4	7	
2-Axle Trucks	1.5	25	1	1	2	1	1	2	
3-Axle Trucks	2.0	350	10	14	24	12	14	26	
4+-Axle Trucks	3.0	871	26	35	61	29	35	64	
Total PCE Trip Generation			1339	40	54	93	44	54	98

TPS = Trailer Parking Space

PCE = Passenger Car Equivalent

¹ Trip rates and vehicle mix from surveys collected at Truck Trailer Parking lots in Long Beach and Compton, CA on December 12, 2013

² Vehicle mix used from survey collected at 21900 S. Alameda Street in Long Beach. This lot had the fewest number of automobile spaces and appears to operate similar to the project with only a guard shack and no other buildings

³ Passenger Car Equivalent (PCE) factors from the San Bernardino County CMP, Appendix B - Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, 2016