

# Appendix TRA

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SB 743 Analysis Memorandum

## Memorandum

To:

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Re: DRAFT SB 743 Analysis  
1919 Williams Development

Date: February 19, 2021

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This memorandum documents SB 743 compliant analysis completed for a proposed development in the City of San Leandro, CA. The proposed development, 1919 Williams, is expected to consist of 220,495 square-feet of warehouse or industrial use. With the passage of SB 743, Vehicle Miles Travelled (VMT) has become an important indicator for determining if a new development will result in a “significant transportation impact” under the California Environmental Quality Act (CEQA). This memorandum summarizes the VMT analysis and resultant findings for the proposed development.

### Methodology and Assumptions

Based on the land use information provided, for the purposes of SB 743 analysis and the determination of transportation related significant impacts, the following land uses were analyzed:

- Industrial / Warehousing

The Alameda County Transportation Commission’s Travel Demand Model (ACTC TDM) was used as the principle tool to determine VMT. As the City of San Leandro has not yet adopted SB 743 guidance and accompanying thresholds, the California Governor’s Office of Planning and Research (OPR) *Technical Advisory*<sup>1</sup> was used as the basis for the analysis contained within this memorandum.

### Screening

The initial task of this effort was to determine whether the proposed development would be screened from a quantitative VMT analysis based on the redevelopment screening criteria contained in OPR’s guidelines. The guidelines state that “if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact.”

To determine whether the proposed development would lead to a net decrease in VMT, it was compared to the previous use to determine how each of the sites compared in terms of trip generation. This assumption is considered reasonable given that the location that the area from which employees would be drawn for both the existing and planned land uses can reasonably be assumed to be the same (average travel distance for employees is assumed to be the same). As such, trip generation is an appropriate proxy for VMT under these circumstances.

The previous use is described as, “general warehousing/distribution center for automotive parts.” Trip generation for the previous use and the proposed development were determined using the *Trip Generation Manual, 10<sup>th</sup> Edition* published by the Institute of Transportation Engineers (ITE). It was

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<sup>1</sup> *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Governor’s Office of Planning and Research, State of California. December 2018.

determined that ITE Land Use Code 150 (Warehousing), which is described in the Trip Generation Manual as, “A warehouse is primarily devoted to the storage of materials, but it may also include office and maintenance areas.” While ITE Land Use Code 154 (High-Cube Transload and Short-Term Storage Warehouse) was also considered based on the number of loading bays for both the previous use and the proposed development, it was not selected as none of the studies contained for that land use were below 250,000 square feet and thus, not representative of either uses. In addition, ITE Land Use Code 150 contains many studies in the range of 200,000 square-feet and has a very high correlation coefficient ( $R^2$  value) indicating that the fitted curve equation is an accurate representation of trip generation for studies in the data range represented.

As VMT analyses do not include heavy vehicles, the determination of a net increase in VMT was based on employee trips. Therefore, the number of employees for the past use and the proposed development were determined. To do this, the Trip Generation Manual was used to estimate the number of employees based on ratio of the number of daily trips that are produced by each employee compared to each thousand square-feet of building size. Both the average rate and equation were used to estimate the number of employees to provide a check on the results. The previous use had a total building size of 236,000 square-feet while the proposed development has a total building size of 220,495 square-feet, a reduction of 15,505 square-feet. When using the average rate, results in the proposed development reducing employment by 5, while using the trip generation equation results in the proposed development reducing employment by 7 compared to the previous use. Therefore, it was determined that the proposed development would result in a net decrease in VMT and would fall under the redevelopment exemption from a quantitative VMT analysis.

## Findings

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Based on the results of this analysis, the following findings are made:

- The proposed development reduces the overall employment compared to the previous use and therefore would result in a net decrease in VMT. **The project is determined to fall under the redevelopment exemption from a quantitative VMT analysis.**