

January 5, 2023

Ms. Nicole Morse
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**SUBJECT: 7400 SLAUSON AVENUE VEHICLE MILES TRAVELLED (VMT) SCREENING
EVALUATION**

Dear Ms. Nicole Morse:

The following Vehicle Miles Travelled (VMT) Screening Evaluation has been prepared for the 7400 Slauson Avenue development (Project), which is located at 7400 Slauson Avenue in the City of Commerce.

PROJECT OVERVIEW

The proposed Project consists of 296,166 square foot industrial warehouse building. The site is currently developed with an existing industrial warehouse building.

BACKGROUND

Changes to 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 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 of 2018) (**Technical Advisory**). (1) Based on OPR's Technical Advisory, the County of Los Angeles has prepared their Transportation Impact Analysis Guidelines (**County Guidelines**). (2) Based on consultation with the City of Commerce, City adopted VMT analysis guidelines and thresholds are not yet available, therefore, this evaluation has utilized the County Guidelines for the review of screening criteria, which are in accordance with OPR's Technical Advisory.

PROJECT VMT SCREENING

Consistent with County Guidelines, projects that meet certain screening criteria based on their location and project type may be presumed to result in a less than significant transportation impact. Consistent with the screening criteria identified with the County Guidelines, the following screening criteria has been selected for evaluation based on their applicability to the proposed Project:

- Non-Retail Project Trip Generation Screening
- Proximity to Transit Based Screening

A land use project need only meet one of the above screening criteria to result in a less than significant impact.

NON-RETAIL PROJECT TRIP GENERATION SCREENING

The County Guidelines identify that small projects anticipated to generate low traffic volumes (i.e., fewer than a net increase of 110 daily trips) are presumed to have a less than significant impact absent substantial evidence to the contrary. 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, 10th Edition, 2017. (3) The proposed Project is anticipated to generate 886 total vehicle trip-ends per day. This estimate was derived using a conservative split in trip generation rates assuming 40% of the building square footage as general light industrial use and 60% of the building square footage as warehousing use. Comparatively, the existing industrial warehouse was surveyed to establish the baseline level of trip generation. The existing warehouse building was surveyed over two consecutive days and the average number of trips per day was calculated as 928 vehicle trip-ends per day - resulting in a *net reduction* of 42 daily vehicle trips. The Proposed project would not exceed the County's trip generation threshold of 110 net new daily vehicle trips. (See Attachment A).

The Non-Retail Project Trip Generation screening criteria is met.

PROXIMITY TO TRANSIT BASED SCREENING

Consistent with guidance identified in the County 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);

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.").

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- 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 map screening as identified in Attachment B, the proposed Project appears to be located within a high-quality transit corridor. However, the Project as designed does not meet the secondary criteria related to FAR and parking supply, therefore, the Project would not be eligible to screen out based on proximity to transit.

The Proximity to Transit Based screening threshold is not met.

CONCLUSION

Based on our review of applicable VMT screening criteria, the Project meets the Non-Retail Project Trip Generation screening criteria. Therefore, the proposed Project is presumed to have a less than significant impact on VMT; no further VMT analysis required.

If you have any questions, please contact me directly at 949-660-1994.

Respectfully submitted,

URBAN CROSSROADS, INC.



Alexander So
Senior Associate

REFERENCES

1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
2. **County of Los Angeles.** *Transportation Impact Analysis.* County of Los Angeles : s.n., July 2020.
3. **Institute of Transportation Engineers.** *Trip Generation Manual.* 10th Edition. 2017.

**ATTACHMENT A:
PROJECT TRIP GENERATION COMPARISON**

TABLE 1: EXISTING SURVEY DATA FOR 7400 SLAUSON AVENUE

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Day 1: May 26, 2021							
Passenger Cars:	30	15	45	5	33	38	655
2-axle Trucks:	1	1	2	3	2	5	86
3-axle Trucks:	3	5	8	8	0	8	120
4+-axle Trucks:	2	4	6	0	0	0	61
Total Truck Trips:	6	10	16	11	2	13	267
Total Trips¹	36	25	61	16	35	51	922
Day 2: May 27, 2021							
Passenger Cars:	27	10	37	12	40	52	650
2-axle Trucks:	4	4	8	7	3	10	92
3-axle Trucks:	3	8	11	5	1	6	128
4+-axle Trucks:	0	2	2	8	0	8	64
Total Truck Trips:	7	14	21	20	4	24	284
Total Trips¹	34	24	58	32	44	76	934
2-Day Average Trip Generation:							
Passenger Cars:	29	13	41	9	37	45	653
2-axle Trucks:	3	3	5	5	3	8	89
3-axle Trucks:	3	7	10	7	1	7	124
4+-axle Trucks:	1	3	4	4	0	4	63
Total Truck Trips:	7	12	19	16	3	19	276
Total Trips¹	35	25	60	24	40	64	928

* Note: data collected on May 26, and 27, 2021.

¹ Total Trips = Passenger Cars + Truck Trips.

TABLE 2: PROPOSED PROJECT TRIP GENERATION RATES

Land Use ¹	ITE LU Code	Units ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Actual Vehicles:									
General Light Industrial ³	110	TSF	0.651	0.089	0.740	0.091	0.559	0.650	4.870
Passenger Cars			0.645	0.085	0.730	0.086	0.554	0.640	4.620
2-Axle Trucks			0.001	0.001	0.002	0.001	0.001	0.002	0.042
3-Axle Trucks			0.001	0.001	0.002	0.001	0.001	0.002	0.052
4+-Axle Trucks			0.004	0.002	0.006	0.003	0.003	0.006	0.157
Warehousing ³	150	TSF	0.131	0.039	0.170	0.050	0.130	0.180	1.710
Passenger Cars			0.120	0.030	0.150	0.034	0.116	0.150	1.110
2-Axle Trucks			0.002	0.001	0.003	0.003	0.002	0.005	0.100
3-Axle Trucks			0.002	0.002	0.004	0.003	0.003	0.006	0.124
4+-Axle Trucks			0.007	0.006	0.013	0.010	0.009	0.019	0.376

¹ Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition Supplement (2020).

² TSF = Thousand Square Feet

³ Vehicle Mix Source: ITE Trip Generation Handbook Supplement (2020), Appendix C.

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.

TABLE 3: PROPOSED PROJECT TRIP GENERATION SUMMARY

Proposed Land Use	Quantity Units ¹	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Actual Vehicles:								
General Light Industrial (40%)	118.466 TSF							
Passenger Cars:		76	10	86	10	66	76	548
2-axle Trucks:		0	0	0	0	0	0	6
3-axle Trucks:		0	0	0	0	0	0	6
4+-axle Trucks:		0	0	0	0	0	0	20
Total Truck Trips:		0	0	0	0	0	0	32
Warehousing (60%)	177.700 TSF							
Passenger Cars:		21	5	26	6	21	27	198
2-axle Trucks:		0	0	0	1	0	1	18
3-axle Trucks:		0	0	0	1	1	2	22
4+-axle Trucks:		1	1	2	2	2	4	68
Total Truck Trips:		1	1	2	4	3	7	108
Total Trips (Actual Vehicles)²		98	16	114	20	90	110	886

¹ TSF = thousand square feet

² Total Trips = Passenger Cars + Truck Trips.

TABLE 4: TRIP GENERATION COMPARISON

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Proposed Project							
Passenger Cars:	97	15	112	16	87	103	746
Total Truck Trips:	1	1	2	4	3	7	140
Total Trips (Actual Vehicles)¹	98	16	114	20	90	110	886
Existing Use							
Passenger Cars:	29	13	41	9	37	45	653
Total Truck Trips:	7	12	19	16	3	19	276
Total Trips (Actual Vehicles)¹	35	25	60	24	40	64	928
VARIANCE							
Passenger Cars:	69	3	71	8	51	58	94
Total Truck Trips:	-6	-11	-17	-12	0	-12	-136
Total Trips (Actual Vehicles)¹	63	-9	55	-4	51	47	-42

¹ Total Trips = Passenger Cars + Truck Trips.

ATTACHMENT B
MAP BASED TPA

