



*Appendix 4.13-1:  
CEQA Transportation Study*



## **TECHNICAL MEMORANDUM**

To: Greg Tsujiuchi and Lisa Kranitz, City of Gardena  
From: Mehul Champaneri and Rita Garcia  
Date: July 7, 2023  
Subject: **16911 Normandie Project, CEQA Transportation Impact Assessment Peer Review**

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Kimley-Horn has conducted a follow-up third-party peer review of the Project's CEQA Transportation Impact Assessment (Ramboll US Corporation, January 2023) on behalf of the City of Gardena to verify that Kimley-Horn's December 15, 2023 third-party peer review Technical Memo (TM) recommendations have been incorporated. The revised January 2023 report addressed the third-party peer review comments and thus is in compliance with the TM recommendations. The analysis, as revised, meets the applicable provisions of CEQA and the State CEQA Guidelines and is adequate for inclusion in the Project EIR.

Please do not hesitate to contact Mehul Champaneri at 916.520.3573 or [mehul.chamaneri@kimley-horn.com](mailto:mehul.chamaneri@kimley-horn.com) with any questions.

# 16911 Normandie Project

## CEQA Transportation Impact Assessment

*DRAFT*

Prepared for:  
16911 Normandie Associates, LLC

January 2023

LB21-0048

FEHR  PEERS

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# 1. Introduction

This report documents the assumptions, methodologies, and findings of a study conducted by Fehr & Peers to evaluate the potential California Environmental Quality Act (CEQA) transportation impacts of the proposed Normandie Avenue Apartments Project (“Project”) in Gardena, California.

## 1.1 Project Description

The proposed Project is located at 16911 S Normandie Avenue in the City of Gardena, between 166<sup>th</sup> Street and Artesia Boulevard. The Project consists of the replacement of 106,100 square feet of warehousing uses with 75 low-rise townhomes and 328 dwelling units within a single 7-story mid-rise apartment building. The Project is expected to be completed in 2027.

**Figure 1** illustrates the ground level site plan for the Project.

### 1.1.1 Project Site Access

Vehicular access to the Project Site will be provided by the following four driveways:

- Driveway 1 serves the apartment building’s parking garage from 169th Street west of Normandie Avenue.
- Driveway 2 is a right-in/right-out only driveway that also serves the apartment building’s parking garage from southbound Normandie Avenue. The Project will install a 125-foot median along Normandie Avenue surrounding the Union Pacific railroad tracks (north and south of the tracks) to prevent left-turns into and out of the Project from Normandie Avenue.
- Driveway 3 serves the townhomes from 170th Street.
- Driveway 4 also serves the townhomes from 169th Street.

Internal roadways link Driveways 3 and 4 to all townhomes, but do not connect to the apartment building garage. The Project will provide 559 parking spaces on-site within an enclosed garage on the first two levels of the apartment building and individual 2-car garages in each townhome with 10 guest spaces. The apartment garage will be designed to permit two-way travel between the two levels with adequate circulation. A continuous fire access lane (varying from 26 to 34 feet in width) is proposed through the townhome portion of the site to provide adequate emergency access.

## 1.2 Study Scope

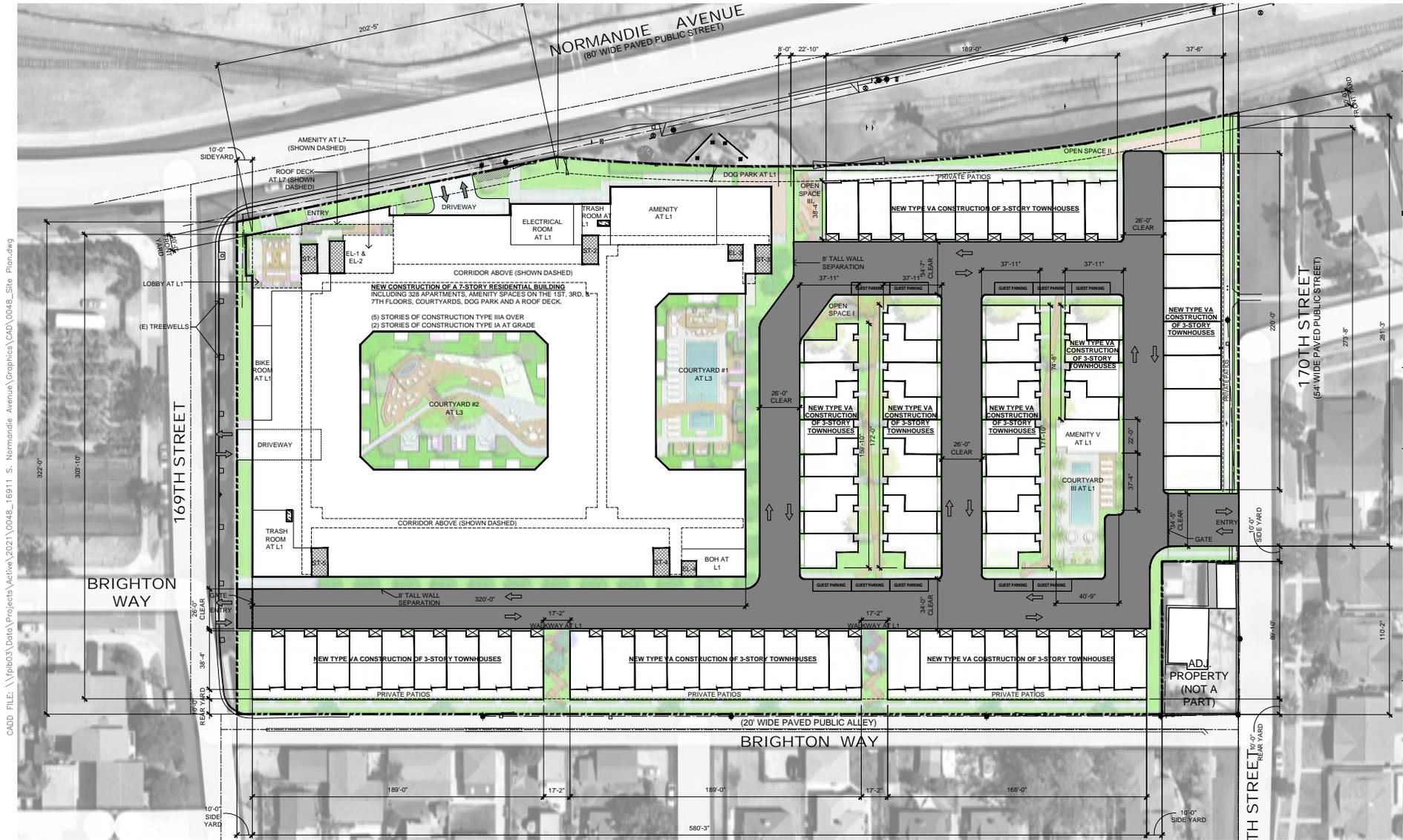
Signed into law in 2013, SB 743 eliminates level of service (LOS) as a basis for determining significant transportation impacts under CEQA and provides a new performance metric – vehicle miles of travel (VMT). The City of Gardena updated its transportation analysis guidelines to reflect this change and adopted new thresholds of significance for transportation impacts based on VMT. Consistent with CEQA, the potential

for significant transportation impacts as a result of the proposed Project has been evaluated based on the transportation impact criteria of Appendix G to the California CEQA Guidelines, which is described in Chapter 3 of this report. This transportation impact study will be incorporated into the environmental documentation being prepared for the proposed Project.

While SB 743 prohibits the use of LOS as a basis for determining significant transportation impacts under CEQA, the legislation does not preclude the application of local general plan policies, zoning codes, conditions of approval, or any other planning requirements. Localized transportation assessments may continue to utilize LOS as a basis for assessing the effects of development projects on traffic operations. Although level of service (LOS) analysis is not permitted as part of the CEQA process, Gardena intends to retain the methodology for use outside of the CEQA process to measure access, safety, and circulation functionality in the vicinity of the project site. The results of the LOS analysis conducted for the Project are presented in the Project's Local Transportation Assessment (LTA) in a separate standalone report that is not a part of the Project's environmental document.

### **1.3 Organization of the Report**

This report is divided into five chapters, including this introduction. Chapter 2 presents the environmental setting in which the Project is located. Chapter 3 presents the methodologies and thresholds of significance that are used in the analysis presented in Chapter 4. Chapter 5 summarizes the results of the study.



CADD FILE: \\plb03\Data\Projects\Active\2021\0048...16911 S. Normandie Avenue\Graphics\CAD\0048\_Site Plan.dwg



CONCEPTUAL - NOT FOR CONSTRUCTION.

Figure 1  
 Project Site Plan  
 Normandie Apartments Project

## 2. Environmental Setting

This chapter describes the existing environmental setting for transportation, including a discussion of existing roadways, bicycle and pedestrian facilities, transit service, and roadway safety conditions. The transportation system serving this area is a complex, built-out, multimodal network designed to carry both people and goods, consisting of roadways, bicycle facilities, sidewalks, and public transit (via bus). The roadway and sidewalk network in the vicinity of the Project site is generally well developed and complete.

### 2.1 Existing Roadway Facilities

The street network in Gardena is primarily gridded with good connectivity. Arterial streets in the study area generally provide two to three vehicle travel lanes in each direction, with left-turn pockets at most signalized intersections and right-turn pockets at some intersections. Posted travel speeds in the study area range from 25 to 45 miles per hour (mph). As described in detail below, regional access to the Project site is provided by Normandie Avenue and a network of arterial and collector streets. The arterial street network that serves the proposed project area includes Artesia Boulevard. The collector streets include Normandie Avenue, Gardena Boulevard, and 166<sup>th</sup> Street. The local streets include 169<sup>th</sup> Street and 170<sup>th</sup> Street. The following describes the key roadway facilities that serve the project site:

- Normandie Avenue – Normandie Avenue is a north/south Major Collector with two lanes in each direction that runs through the City of Gardena. Normandie Avenue is designated as a truck route within the City of Gardena. Left-turn lanes are provided at major intersections. The posted speed limit is 35 mph. On-street parking is prohibited on both sides of the street. The Union Pacific Torrance Branch right-of-way (ROW) crosses Normandie Avenue and runs along the eastern frontage of the Project Site.
- Artesia Boulevard – Artesia Boulevard is an east/west Arterial with three to four lanes in each direction that is under local jurisdiction. Artesia Boulevard transitions into SR-91 (Gardena Freeway) east of Vermont Avenue under Caltrans jurisdiction. Artesia Boulevard contains a raised median and the posted speed limit is 45 mph. There are left-turn pockets at all intersections. On-street parking is prohibited on both sides of Artesia Boulevard.
- Gardena Boulevard – Gardena Boulevard is an east-west Collector that runs through Gardena with a short jog at Normandie Avenue. Gardena Boulevard has one lane in each direction and a posted speed of 30 mph east of Normandie Avenue and 25 mph west of Normandie Avenue. On-street parking is permitted on both sides of the street, with angled parking provided east of Normandie Avenue.
- 166<sup>th</sup> Street – 166<sup>th</sup> Street is an east-west street that runs from Gramercy Place in Torrance to Berendo Avenue in Gardena. 166<sup>th</sup> Street is a local street except for the segment between Western Avenue and Normandie Avenue, where it is a Collector. On-street parking is permitted on both sides of the street, and the posted speed limit is 30 mph west of Normandie Avenue and 25 mph

east of Normandie Avenue. A raised median is provided east of Normandie Avenue that contains the right of way and double tracks for the Union Pacific Railroad Torrance Branch.

- **169<sup>th</sup> Street** – 169<sup>th</sup> Street is an east/west local street that runs from Denker Avenue to Normandie Avenue with one lane in each direction. On-street parking is generally provided on both sides of 169<sup>th</sup> Street.
- **170<sup>th</sup> Street** – 170<sup>th</sup> Street is an east/west local street that runs from Denker Avenue to Normandie Avenue where it dead ends and Normandie Avenue to Vermont Avenue with one lane in each direction. 170<sup>th</sup> Street west of Normandie Avenue does not connect to Normandie Avenue or the segment east of it. On-street parking is generally provided on both sides of 170<sup>th</sup> Street and the posted speed limit is 25 mph.
- **Brighton Way** – Brighton Way is a north/south local alleyway that runs from 169<sup>th</sup> Street to 170<sup>th</sup> Street with a shared lane for each direction. On-street parking is not provided.

## 2.2 Existing Pedestrian and Bicycle Facilities

Existing sidewalks are provided along the project frontage and within a continuous and complete pedestrian network in the surrounding area. Sidewalks along the south side of 169<sup>th</sup> Street are discontinuous for a short segment from just west of the project site to Halldale Avenue. Sidewalks are also not present on Brighton Way, which is a public alleyway. Marked crosswalks, curb ramps, and pedestrian signals are provided at the nearest signalized intersections along Normandie Avenue at 166<sup>th</sup> Street and 170<sup>th</sup> Street, which provides direct access to bus transit stops and surrounding land uses.

Separated or protected bicycle facilities are not currently provided along Normandie Avenue along the project site. According to the South Bay Bicycle Master Plan,<sup>1</sup> Normandie Avenue is designated as a bike route (Class III) from 182<sup>nd</sup> Street to 170<sup>th</sup> Street. Additionally, 166<sup>th</sup> Street, 170<sup>th</sup> Street and Gardena Boulevard are designated as bike routes (Class III), but not on segments directly adjacent to the project site.

The following future Bicycle Friendly Street segment is proposed in the South Bay Bicycle Master Plan as a prioritized project in Gardena that is directly adjacent to the project site and may be implemented by the City in the future:

- 170<sup>th</sup> Street from Denker Avenue to Vermont Avenue (0.8 miles)

## 2.3 Existing Public Transit Facilities

The project site is located within a ¼-mile of various bus stops and is served by transit service via the City of Gardena's Transit Service, GTrans. The following bus routes provide service within a ¼-mile walking distance of the project site:

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<sup>1</sup> Alta Planning + Design, South Bay Bicycle Master Plan prepared for Los Angeles County Bicycle Coalition and South Bay Bicycle Coalition, available at <https://southbaybicyclecoalition.org/sbbcplus-master-plan/>.

- **Route 1X (GTrans):** Connects the LA Metro C Line Redondo Beach Station and the City of Gardena to Downtown Los Angeles. This line runs express service between Rosecrans Avenue and Downtown Los Angeles. Bus stops within a ¼ mile include: 166th Street and Brighton Avenue (eastbound and westbound).
- **Route 4 (GTrans):** Connects the Harbor Gateway Transit Center to various destinations in Gardena and Hawthorne via Normandie Avenue, 135<sup>th</sup> Street, Van Ness Avenue, and Marine Avenue. Bus stops within a ¼-mile include: Normandie Avenue and 170th Street (southbound and northbound).

## 3. Methodologies & Thresholds of Significance

The potential for significant transportation impacts as a result of the proposed Project have been evaluated based on the transportation impact criteria of Appendix G of the CEQA Guidelines.

### 3.1 Impact Criteria

Pursuant to Appendix G, impacts to transportation would be considered significant if the proposed Project were found to:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). CEQA Guidelines Section 15064.3, subdivision (b) includes the criteria for analyzing transportation impacts for land use projects, as follows: Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access.

### 3.2 Analysis Methodologies

#### 3.2.1 Criterion 1: Program, Plan, Ordinance, or Policy (PPOP)

The proposed Project will be qualitatively evaluated to determine if it is expected to conflict with a relevant PPOP related to the circulation system. A conflict could occur if the proposed Project would preclude the ability of a local jurisdiction to implement goals or policies.

#### 3.2.2 Criterion 2: Conflict or be Inconsistent with CEQA Guidelines § 15064.3, Subdivision (b).

The City of Gardena (the City) updated its transportation analysis guidelines based primarily on the recommendations detailed in the Governor's Office of Planning and Research (OPR) *Technical Advisory*.

The City's guidelines describes the four components of a VMT analysis necessary to comply with the new CEQA guidelines:

1. **VMT Screening & Qualitative Review.** The first step is to determine when a VMT analysis is required. Projects should be screened from a VMT analysis based on their size, location, and/or

accessibility to transit. If a project meets the screening criteria requiring a VMT analysis, it can be presumed to have a less than significant impact under this impact criterion.

2. **VMT Analysis Methodology.** If a project is not screened from requiring a VMT analysis, a regional travel demand model is typically used to estimate a project's VMT. The City's guidance recommends that VMT be reported as "Home-Based VMT" per capita for residential projects and "Home-Based Work VMT" per employee for the employees of a project site. Home-Based VMT includes all vehicle roundtrips originating from the residence of the trip-maker. Home-Based Work VMT includes only vehicle roundtrips between the residence of the trip-maker and their place of work.
3. **VMT Impact Thresholds.** Lead agencies, such as the City of Gardena, have the discretion to develop and adopt their own VMT thresholds, or rely on thresholds recommended by other agencies, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence. See also CEQA Guidelines Section 15064.3(c). The City adopted a threshold that projects should have VMT that is at least 15 percent below existing VMT per capita or per employee when compared to a regional or citywide average of these metrics to avoid a significant impact.

### *3.2.2.1 Gardena VMT Methodologies & Thresholds of Significance*

The VMT methodology employed in this study is consistent with the screening methodologies and impact criteria adopted by the City. Per the City's adopted criteria, the baseline VMT for the City is calculated using the 2016 Regional Transportation Plan (RTP) Travel Demand Forecasting (TDF) model developed by the Southern California Association of Governments (SCAG). The methodology includes vehicle trips within the SCAG model to generate the following metric as applicable for the residential component of the Project:

1. Home-based VMT per Capita: Home-based vehicle trips are traced back to the residence of the trip-maker (non-home-based trips are excluded) and then divided by the residential population within the geographic area. This metric is used to estimate VMT for residential land uses.

#### *3.2.2.1.1 VMT Impact Thresholds*

The City of Gardena adopted a 15% below the baseline regional average VMT (as defined by the SCAG six-county region) as the impact threshold for land use development projects in the City.<sup>2</sup> If a project would generate VMT higher than the threshold, then it would be expected to have a VMT impact, and if the project would generate VMT lower than the threshold, then it would not be expected to have a VMT impact. The regional baseline VMT and City's VMT impact thresholds are summarized in **Table 1**.

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<sup>2</sup> Fehr & Peers, SB 743 Implementation Transportation Analysis Updates prepared for the City of Gardena (June 2020), available at <https://cityofgardena.org/wp-content/uploads/2021/08/VMT-Exhibit-A-SB-743-Transportation-Analysis-Updates.pdf> (last accessed August 2022).

**Table 1: Baseline Regional VMT and City of Gardena VMT Impact Thresholds**

VMT Metrics - Regional Home-Based VMT per Capita	Baseline VMT	VMT Impact Threshold*
2020	14.35	12.20
2040	12.97	11.02

\* The VMT Impact Threshold for is 15% below the respective Baseline VMT.

### 3.2.3 Criterion 3: Geometric Hazards

The proposed Project will be evaluated to determine if it is expected to conflict with relevant design standards or introduce new or significantly worsen any existing geometric hazards, particularly related to the design of driveways.

### 3.2.4 Criterion 4: Emergency Response

The proposed Project will be evaluated to determine if it is expected to worsen emergency response times to the Project site or to the surrounding community.

# 4. CEQA Transportation Impact Analysis

This chapter assesses the impacts of the proposed Project in accordance with the methodologies and thresholds of significance detailed in Chapter 3.

## 4.1 Criterion 1: Programs, Plans, Ordinances, and Policies Conflicts Review

The table below discusses local plans and policies that could have the potential to be inconsistent with the Project. Relevant plans, goals, policies and/or objectives that affect transportation and mobility in the City of Gardena were evaluated and, as summarized in **Table 2**, no conflicts were identified. Therefore, no significant transportation impact is anticipated based on this criterion and no mitigation would be required.

**Table 2: Programs, Plans, Ordinances, and Policies Conflicts Review**

Plans	Description	Relevant Goals, Policies and/or Objectives	Conflicts Discussion
Southern California Association of Governments (SCAG) Regional Transportation Plan	Every 4 years, SCAG updates its RTP for the 191-city SCAG region. Beginning with the 2012 RTP, SB 375 required the inclusion of a SCS in RTPs prepared by MPOs such as SCAG. The key goal of the SCS is to achieve GHG emission reduction targets through integrated land use and transportation strategies. A key objective is for planners and developers to consider how land use patterns influence travel demand.	The 2020-2045 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and includes 10 goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The SCS establishes a land use vision of center focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation (SCAG 2020).	As part of the transportation modeling and analysis for the RTP/SCS, SCAG prepares population and employment growth projections by Transportation Analysis Zone (TAZ) and creates a future transportation network that represents the changes to the existing network based on the regional project list. TAZs are geographic polygons representing communities and neighborhoods at a sub-city level of detail. The proposed Project was compared against the RTP/SCS forecasts and network changes included in the 2020 SCAG RTP model. Given that the proposed Project would not result in any changes to the existing transportation network, and would be increasing housing density in urban infill areas near transit, there are no conflicts with the RTP/SCS.

Plans	Description	Relevant Goals, Policies and/or Objectives	Conflicts Discussion
South Bay Bicycle Master Plan	The SBBMP is a multi-city bicycle master plan developed in 2011 by the LACBC and the SBBC with the common goal of improving the safety and convenience of bicycling in the South Bay Region. Seven member cities of the SBCCOG were involved in the development of the SBBMP, including the City of Gardena.	1) Policy 1.1.4 – Review and encourage implementation of policies and facilities proposed in the SBBMP whenever planning new bicycle facilities or capital improvement projects that may be related to bicycle improvements.	The proposed Project has no conflicts with the SBBMP because the project would not make any changes to the existing bicycle infrastructure surrounding the Project site. It would not preclude the installation of any planned bicycle facilities in the SBBMP. Appropriate striping and/or signage would be installed at driveway approaches to meet MUTCD and City design standards and in accordance with roadway safety best practices. In addition, the proposed Project supports this policy by providing bicycle amenities and parking on-site for residents, visitors, and employees.
City of Gardena General Plan Circulation Element	The Gardena General Plan Circulation Element was adopted in 2006 and updated in 2020. It provides goals and policies for the circulation system.	1) CI Goal 1 – Promote a safe and efficient circulation system that benefits residents, business, and integrates with the greater Los Angeles/South Bay transportation system. 2) CI Goal 2 – Promote a safe and efficient local street system that is attractive and meets the needs of the community. 3) CI Goal 3 – Develop Complete Streets to promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities. 4) CI Goal 4 – Provide adequate public facilities and infrastructure that support the needs of City residents and businesses.	The proposed Project increases residential density in an area with a mix of uses and amenities. A robust sidewalk network is available throughout the study area, providing ease of access to the Project site for pedestrians from the surrounding neighborhood and nearby destinations. The Project would not preclude the City of Gardena from implementing the goals of the Circulation Element, would provide street level access to proposed uses, and on-site bicycle parking. Thus, the proposed Project has no conflicts with Circulation Element goals related to transportation.

## 4.2 Criterion 2: CEQA Guidelines § 15064.3, Subdivision (b) Conflict Review (VMT Analysis)

### 4.2.1 VMT Screening

The first step of a VMT analysis is to determine what type of analysis, if any, is needed. The City of Gardena identified three screening criteria to assess if a VMT analysis would be required for the proposed project. The three screening criteria are detailed below and applied to determine if the Project has the potential to result in a VMT impact.

### *Screening Criteria 1: Project Type*

Land use projects that generate less than 110 daily trips and local-serving retail projects, defined as commercial projects with local-serving retail uses less than 50 thousand square feet (ksf), are presumed to have less than significant VMT impacts absent substantial evidence to the contrary. Therefore, these projects are screened out from completing a VMT analysis based on project size. Residential projects that are 100% affordable are also screened out.

*Based on the ITE Trip Generation Manual (11<sup>th</sup> Edition) trip rates for the various multi-family land use types, the Project's proposed 403 total residential units is expected to generate more than 110 daily trips and is not 100% affordable housing. Therefore, the Project is not screened out from VMT analysis under this screening criterion.*

### *Screening Criteria 2: Low VMT Area Screening*

Residential projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. Based on the VMT impact threshold as identified by the City of Gardena, low VMT for residential projects is defined as an area that generates VMT on a per capita basis that is 15% or more below the Regional Home-Based VMT per Capita. In the City of Gardena, a low VMT area for residential projects generates no more than 12.20 Home-Based VMT per Capita in 2020 and 11.02 VMT per Capita in 2040 as shown above in Table 2. The traffic analysis zones (TAZ) contained in the SCAG model can be used to identify the low VMT areas in the City of Gardena.

*The Project is located in a TAZ estimated to generate 11.01 VMT per capita, which is 23.3% below the 2020 SCAG regional baseline VMT of 14.35. When compared to the 2040 SCAG regional baseline VMT of 12.97, the Project's VMT per capita is 15% below the 2040 SCAG regional baseline VMT. Therefore, the Project is in an area with low residential VMT, which means the Project can be presumed to have a less than significant VMT impact and can be screened out from further VMT analysis.*

In addition, OPR's Technical Advisory suggests that a project in a low VMT area is presumed to have a less than significant VMT impact if the project incorporates similar features as other development in the vicinity, such as similar density, similar mix of uses, and similar transit access. The TAZ contains primarily residential land uses to the north, south, east, and west of the Project, including other multi-family residential developments, so the Project has similar characteristics.

### *Screening Criteria 3: Transit Proximity Screening*

Projects located in proximity to high quality transit may also be exempt from VMT analysis because they are presumed to have a less than significant impact absent substantial evidence to the contrary. Transit Priority Areas, or TPAs, are defined in the OPR technical advisory as a ½ mile radius around an existing or planned major transit stop or an existing stop along a high-quality transit corridor (HQTC). A HQTC is defined as a corridor with fixed route bus service frequency of no longer than 15 minutes during peak commute hours. For this analysis, the morning and afternoon peak commute hours are defined as 6:00 to

9:00 AM and 3:00 to 6:00 PM, respectively. A map of the City of Gardena's High-Quality Transit Areas (pre-pandemic) showing the frequent bus routes is shown in **Figure 2**.

*PRC Sec 21155, which states in a portion not excerpted in the City's Guidance, "A project shall be considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor." The project has more than 25% of its area farther from Gardena's High-Quality Transit Areas. Therefore, the Project is not screened out from VMT analysis under this screening criterion.*

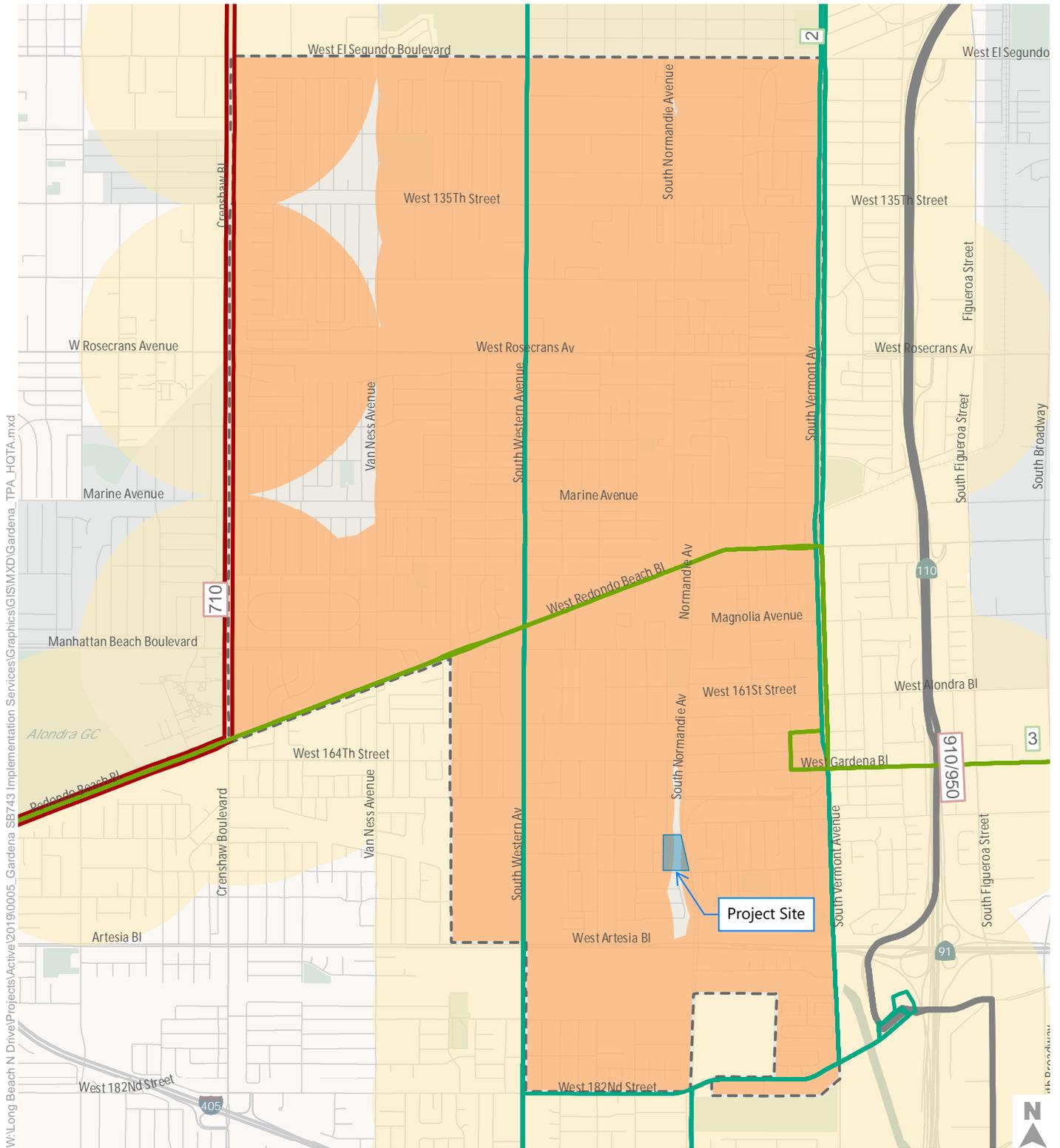


Figure 2  
High-Quality Transit Areas



## 4.2.2 Vehicle Miles Traveled Impact Analysis

As summarized in Table 4, the proposed project meets one of the City's screening criteria:

1. The Project is screened from VMT analysis because it is in a low VMT area, which is any TAZ that generates VMT per capita that is greater than 15% below the baseline VMT. Based on the SCAG Model, the Project site is located in a TAZ that is 23.3% below the SCAG regional average. Therefore, the Project meets the low VMT screening criteria.

Based on the City of Gardena's transportation guidelines and impact thresholds, the Project can be screened out from a full VMT analysis and is presumed to result in a less than significant transportation impact under this impact criterion.

### 4.2.2.1 VMT Analysis for Cumulative Conditions

For baseline conditions, the Project is screened out from further VMT analysis based on its location in a low VMT area. For cumulative conditions, a project that is below the VMT impact thresholds and does not have a VMT impact under baseline conditions would also not have a cumulative impact as long as it is aligned with long-term State environmental goals, such as reducing GHG emissions, and relevant plans, such as the SCAG RTP/SCS. The Project supports long-term environmental goals as an in-fill residential project that provides housing near commercial and employment areas. The Project is also aligned with the SCAG RTP/SCS because the Project provides housing development in a low-VMT TAZ, which is consistent with the goals of the RTP/SCS.

## 4.3 Criterion 3: Geometric Design Hazards Impact Review

Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the Project site. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections. These impacts are typically evaluated for permanent conditions after project completion but can also be evaluated for temporary conditions during project construction.

As shown in the Project site plan in **Figure 1**, the Project's driveways are perpendicular to the public right-of-way and adequately spaced from existing signalized intersections. The Project proposes one driveway on Normandie Avenue in close proximity to the Union Pacific Torrance Branch railroad, (Driveway 2). Train travel is relatively light on this branch, and trains travel slowly along this corridor segment due to track curvature, at-grade crossings, and in-street train operations. Driveway 2 is proposed to be right-in/right-out only on southbound Normandie Avenue and would intersection the roadway at a right-angle outside of the railroad tracks. A median will be installed along Normandie Avenue surrounding the railroad tracks to prevent left-turns to and from Driveway 2. If train traffic is blocking egress from Driveway 2, Driveway 1 is available for ingress and egress associated with the apartment building. Additionally, the Project does

not introduce incompatible uses with the surrounding community, as the Project proposes additional residential dwelling units adjacent to other residential areas. Therefore, the Project is not expected to trigger significant impacts for this criterion.

#### **4.4 Criterion 4: Emergency Access Impact Review**

Multiple driveways are available for the Project for emergency access, and a fire lane would be provided. The Project is also located approximately 1 mile from the Los Angeles County Fire Department Station 158, which serves the City of Gardena. While the Project is expected to increase the number of vehicles on local roadways, emergency responders have sirens and are able to bypass intersection queues, utilize two-way left-turn lanes, and use the opposite side of streets. The Project also does not propose any features that would inhibit emergency access to nearby areas. Therefore, the Project is expected to have a less than significant impact in regard to provision of emergency access and no mitigation is required.

## 5. Summary

This study was prepared to analyze the potential transportation impacts associated with the 16911 Normandie Apartments Project. The following summarizes the results of the study:

- The Project consists of the replacement of 106,100 square feet of warehousing uses with 75 low-rise townhomes and 328 apartments in a separate building on the same Project Site.
- The apartment units would be served by one right-in/right-out only driveway on Normandie Avenue and one full access driveway on 169<sup>th</sup> Street west of Normandie Avenue. The townhomes would be served by one full access driveway on 169<sup>th</sup> Street and one full access driveway on 170<sup>th</sup> Street. The Project would provide 559 parking stalls.
- The Project would install a median along Normandie Avenue surrounding the Union Pacific railroad tracks to prevent left-turns into and out of the Project from Normandie Avenue.
- The Project has no conflicts with the SCAG 2020 RTP/SCS, the South Bay Bicycle Master Plan, and the City of Gardena General Plan Circulation Element. Therefore, the Project is not expected to have a significant impact related to Programs, Plans, Ordinances, and Policies Conflicts.
- Because the Project is screened out from detailed VMT analysis for being located in a low VMT area the Project is presumed to result in a less than significant impact on Home-Based VMT per Capita.
- The Project is not expected to have a significant impact related to geometric hazards or emergency response.