

Appendix 6.17-1: Vehicle Miles Traveled Assessment





TECHNICAL MEMORANDUM

To: Francesca Bravo
Linscott, Law & Greenspan, Engineers

From: Connie Leung

Copy: Rita Garcia, Kiana Graham, and Sowmya Chandrasekhar
Kimley-Horn and Associates

Date: October 18, 2023

Subject: **TPG 1610 Artesia Project, Vehicle Miles Traveled (VMT) Peer Review**

Kimley-Horn has conducted a follow-up third-party peer review of the Vehicle Miles Traveled (VMT) *CEQA Transportation Analysis for TPG 1610 Artesia Project* (Linscott, Law and Greenspan, Engineers, October 2023) on behalf of the City of Gardena to verify that Kimley-Horn's September 25, 2023 third-party peer review recommendations have been incorporated. The revised October 2023 VMT Assessment Memorandum addressed the third-party peer review comments and thus is in compliance with the peer review recommendations. The analysis, as revised, meets the applicable provisions of CEQA and the State CEQA Guidelines and is adequate for inclusion in the Project SCEA.

Please do not hesitate to contact Connie Leung at 925-965-7707 or connie.leung@kimley-horn.com with any questions.

MEMORANDUM

To: Amanda Acuna
City of Gardena Planning Department

Date: October 13, 2023

From: Alfred C. Ying, P.E., PTP *ACY*
Francesca S. Bravo *FSB*
Linscott, Law & Greenspan, Engineers

LLG Ref: 1-23-4536-1

Subject: TPG 1610 Artesia Project – Vehicle Miles Traveled Assessment

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Linscott, Law & Greenspan, Engineers (LLG) has prepared this memorandum to summarize the vehicle miles traveled (VMT) screening assessment prepared for the proposed TPG 1610 Artesia Project (“proposed project”) located in the City of Gardena, California. Pursuant to the current statutory requirements of the California Environmental Quality Act (CEQA) Guidelines, a project’s transportation impact must be determined on the basis of VMT. Therefore, this memorandum provides a description of the proposed project, a discussion of the current CEQA statutes and the status of the City of Gardena’s environmental review procedures, a detailed review of the applicable VMT screening criteria contained in the City of Gardena SB 743 Implementation Transportation Analysis Updates¹, and conclusions regarding the proposed project’s VMT impacts.

Description of Proposed Project

The 3.43-acre project site is located at 1610 West Artesia Boulevard situated along the south side of Artesia Boulevard, east of Western Avenue (APN 6106-013-049). The project site is currently occupied by two, one-story commercial buildings totaling approximately 39,510 square feet and a surface parking lot. Of the existing total square footage, approximately 31,010 is currently active and operational with auto repair stores. The remaining 8,500 square feet of building floor area, which were formerly occupied by a car wash/detail center, are currently vacant. All structures will be removed to accommodate the proposed project. The project site and vicinity are shown in *Figure 1*.

The proposed project consists of the development of a 6-story, podium apartment building comprised of 300 residential units including 283 market rate units and 17 affordable (very low income) units. The proposed unit mix consists of 54 studio units, 168 one-bedroom units, and 78 two-bedroom units. Vehicular access is planned to be provided via a single driveway on Artesia Boulevard. A total of 528 parking spaces is planned to be provided on-site. The project build-out and occupancy year is anticipated by the year 2025. The proposed site plan is illustrated in *Figure 2*.

¹ City of Gardena SB 743 Implementation Transportation Analysis Updates,” June 2020.

Vehicle Miles Traveled Assessment

Pursuant to the passage of Senate Bill 743 in 2013, the State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the CEQA guidelines in November 2017 that amended the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in vehicle miles traveled (VMT). The California Natural Resources Agency certified and adopted the revisions to the CEQA Guidelines in December of 2018, and as of July 1, 2020 the provisions of the new section are in effect statewide. Concurrently, OPR developed the *Technical Advisory on Evaluating Transportation Impacts in CEQA*² (December 2018), which provides non-binding recommendations on the implementation of VMT methodology and which has significantly informed the way VMT analyses are conducted in the State.

Accordingly, for the purpose of environmental review under CEQA, the City of Gardena has established criteria for transportation impacts based on VMT for land use projects and plans which is generally consistent with the recommendations provided by OPR in the *Technical Advisory*.

Consistent with the recommendations provided by the OPR in the *Technical Advisory*, the City's Guidelines recognize three screening criteria which may be applied to screen proposed projects out of detailed VMT analysis. The guidelines provide the following three (3) types of potential screening criteria that may be applied to screen projects from project-level assessment:

- Project Size Screening
- Low VMT Area Screening
- Transit Priority Area (TPA) Screening

As outlined in the City's Guidelines, proposed projects are not required to satisfy all of the screening criteria in order to screen out of further VMT analysis; satisfaction of one criterion is sufficient for screening purposes. Projects, or project components, which are screened out of detailed VMT assessment based on these criteria are presumed to have less than significant transportation impacts.

Based on a review of the project's development program, size, and other pertinent factors, it was determined that the City's screening criteria may be applied to the proposed project. Specifically, the "Low VMT Area Screening" screening criterion is applicable to the proposed project. The following paragraphs provide a detailed explanation of each screening criteria as it relates to the proposed project:

² *Technical Advisory on Evaluating Transportation Impacts in CEQA*, Governor's Office of Planning and Research, December 2018.

Project Size Screening Criteria

Project types have been identified in the City's Guidelines as having the presumption of a less than significant impact. As outlined in the City's guidelines, the following project types can be presumed to have a less than significant impact and do not require a VMT analysis:

- Projects generating less than 110 daily vehicle trips
- Local-serving retail uses less than 50,000 square feet
- 100 percent Affordable Residential Development

In order to determine the existing site traffic generation, weekday manual daily turning movement traffic counts were conducted at the existing site. Through the conduct of these counts, the number of existing vehicle trips entering and exiting the site on a daily basis can be determined. The traffic count data for the three site driveways was compiled, reviewed and analyzed to determine the highest daily traffic volume at the site. The daily traffic generation associated with the existing uses is presented below:

- Daily: 822 vehicle trips

Traffic volumes to be generated by the proposed project were forecast for the 24-hour period. Trip generation rates provided in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*³ were utilized to forecast project traffic generation for the proposed project. ITE Land Use Code 221 (Multi-Family Housing Mid-Rise) and ITE Land Use Code 223 (Affordable Housing) trip generation rates were used to forecast the traffic volumes expected to be generated by the proposed residential units.

The trip generation forecast for the proposed project is summarized in **Table 1**. As presented in *Table 1*, the proposed project is forecast to generate 545 net new daily trip ends during a typical weekday (273 inbound trips and 273 outbound trips) over a 24-hour period. As the Project is forecast to generate more than 110 daily vehicle trips and is not a 100 percent affordable residential development, the Project does not satisfy the project size screening criteria.

Low VMT Area Screening Criteria

As outlined in the City's guidelines, residential and office development projects located within a low VMT-generating area may be presumed to have a less than significant impact absent any substantial evidence to the contrary. Other employment-related and mixed-use land use projects may also qualify for the screening if the project can reasonably be expected to generate VMT per resident, per

³ Institute of Transportation Engineers *Trip Generation Manual*, 11th Edition, Washington, D.C., 2021.

worker or per service population that is similar to the existing land uses in the low VMT-generating area.

Low VMT areas for residential projects are defined as traffic analysis zones (TAZs) that generate VMT on a per capita basis that is at least 15% lower than the regional average. The Southern California Association of Governments (SCAG) travel demand model was used to establish VMT performance Citywide and for individual TAZs. The VMT metrics for the City of Gardena are then compared to the SCAG regional average. As noted in the City's Guidelines, the average Home-Based VMT per capita in the City is more than 20% below the regional average.

The City's low VMT area map for residential projects is shown in *Figure 3*. As shown in *Figure 3*, the Project is located in an area that is more than 15% below the baseline regional average. Thus, the Project satisfies the low VMT area screening criteria and therefore screens out of VMT analysis.

Proximity to Transit Screening Criteria

CEQA Guidelines Section 15064.3(b)(1) states in part: "Generally, projects within one-half mile of either an existing major transit stop⁴ or a stop along an existing high-quality transit corridor⁵ should be presumed to cause a less than significant transportation impact." Pursuant to the statute, development projects may be screened out of VMT analysis based on proximity to certain transit facilities due to the presumption of less than significant impacts. The *Technical Advisory* also notes that certain project-specific or location-specific information which might indicate that the presumption is not appropriate. If the answers to the following questions are all no, then the presumption is assumed appropriate and the project can be screened out of further analysis.

Does the project have a Floor Area Ratio (FAR) less than 0.75 (for office, retail, hotel and industrial projects) or less than 20 units per acre (for residential projects)?

- Does the project provide more parking than required by the City Code?
- Is the project inconsistent with the SCAG RTP/SCS?
- Does the project replace residential units set aside for lower income households with a smaller number of market-rate residential units?

The project site is located within a High Quality Transit Area (HQTA) as identified in SCAG's Connect SoCal. HQTAs are areas located within a one-half mile of an

⁴ Public Resources Code Section 21064.3: "'Major transit stop' means a site containing any of the following: (a) An existing rail or bus rapid transit station. (b) A ferry terminal served by either a bus or rail transit service. (c) 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."

⁵ "'A 'high quality transit corridor' is defined as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours."

existing or planned transit stop or a stop along an existing high-quality transit corridor. Western Avenue is identified as a high-quality transit corridor in SCAG's Connect SoCal. The proposed project site is located within a one-half mile from Western Avenue, and therefore meets the statutory requirements to presume less than significant transportation impacts.

The proposed project was further reviewed in order to determine if any project-specific or site-specific information indicates that the presumption would not be valid. A detailed review of each question is provided below.

- Does the residential project have less than 20 units per acre?
No. Based on information provided by the project Applicant, the project would be developed with a density of 70 units per acre which is greater than 20 units per acre.
- Does the project provide more parking than required by the City Code?
Yes. The project's parking supply was compared to the City of Gardena's Municipal Code. Pursuant to Chapter 18.18A of the Gardena Municipal Code, high-density multi-family dwelling units are required to provide 1.0 parking space for each studio unit, 1.5 parking spaces for 1-2 bedroom units, two parking spaces for 2 or more bedroom units, and 0.25 guest parking space per unit. Therefore, the Municipal Code parking requirement for the proposed project is 498 parking spaces. The proposed project will provide a total of 528 parking spaces, and therefore will provide more parking spaces than required by the City of Gardena Municipal Code.
- Is the project inconsistent with the SCAG RTP/SCS?
No. The project site is currently zoned as R-6, Very High Density Multi-Family Residential. Since the project is consistent with the City's adopted zoning, and is not expected to result in substantial changes to the existing transportation network/infrastructure, it is assumed to be consistent with the land use and transportation network assumptions incorporated in the SCAG Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS).
- Does the project replace residential units set aside for lower income households with a smaller number of market-rate residential units?
No. The project will provide 300 residential units including 283 market rate units and 17 affordable (very low income) units.

Based on this review, it is concluded that the answer to three of the four questions is no. Since it is concluded that the answer to one of the questions is yes, according to the *Technical Advisory*, the presumption of less than significant impacts may not be appropriate. Therefore, while the project does meet the conditions to presume less than significant transportation impacts stated in CEQA Guidelines Section 15064.3

and therefore screen out of VMT analysis, it has been conservatively concluded that such a presumption may not be appropriate for the proposed project. Therefore, the project does not satisfy the proximity to transit screening criteria.

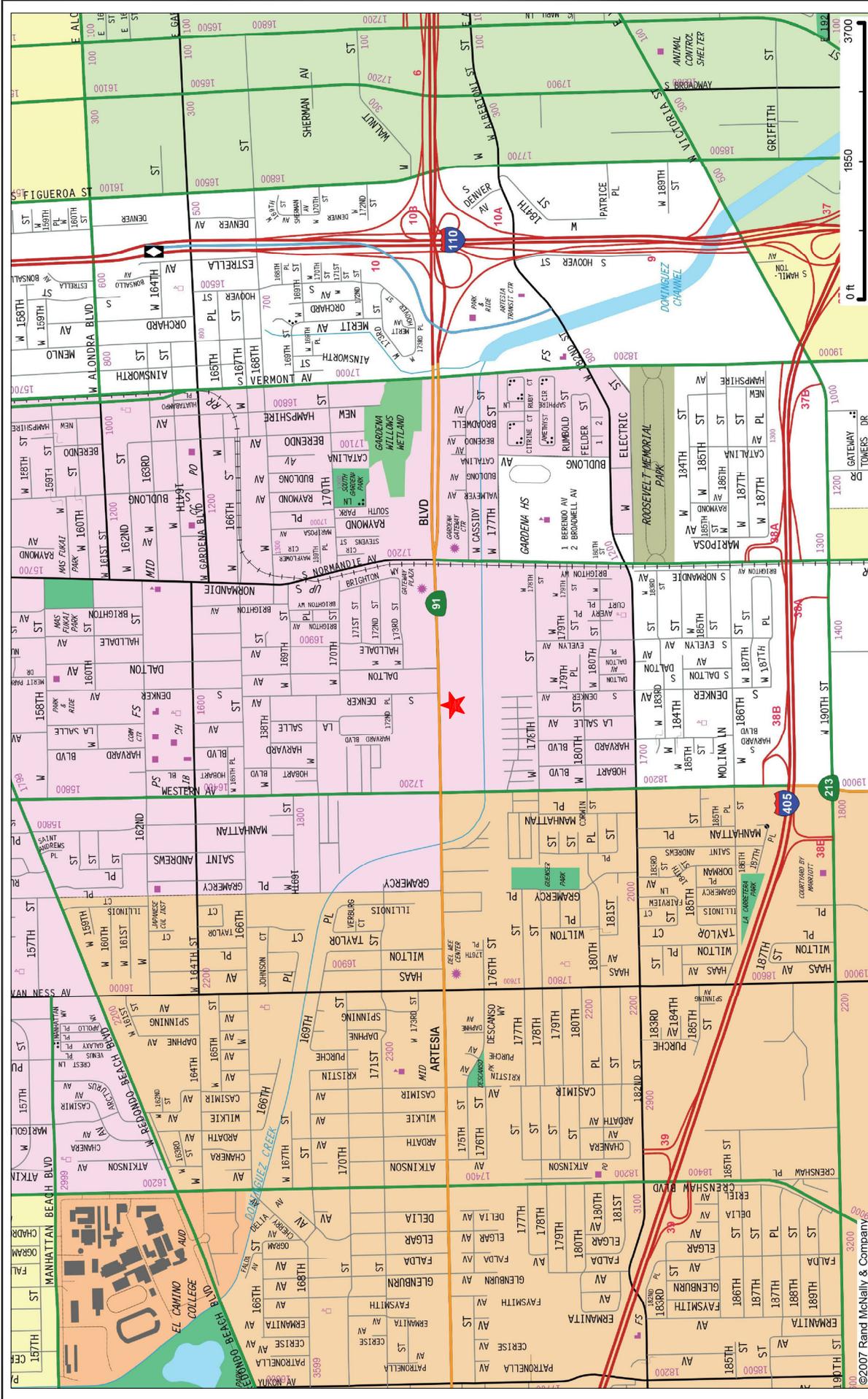
Summary and Conclusions

Based on a detailed review of the VMT screening criteria set forth in the City's Guidelines, it is determined that the proposed project satisfies the low VMT area screening criteria.

As previously stated, proposed projects are not required to satisfy all of the screening criteria in order to screen out of further VMT analysis; satisfaction of one criterion is sufficient for screening purposes. As such, through satisfaction of one or more of the screening criteria, the proposed project meets the condition to presume less than significant transportation impacts and is therefore not required to conduct any additional VMT analysis.

Please feel free to call us at 626.796.2322 with any questions or comments regarding the VMT screening assessment prepared for the proposed project.

Attachments



N MAP SOURCE: RAND McNALLY & COMPANY

★ Project Site



Figure 1
Vicinity Map

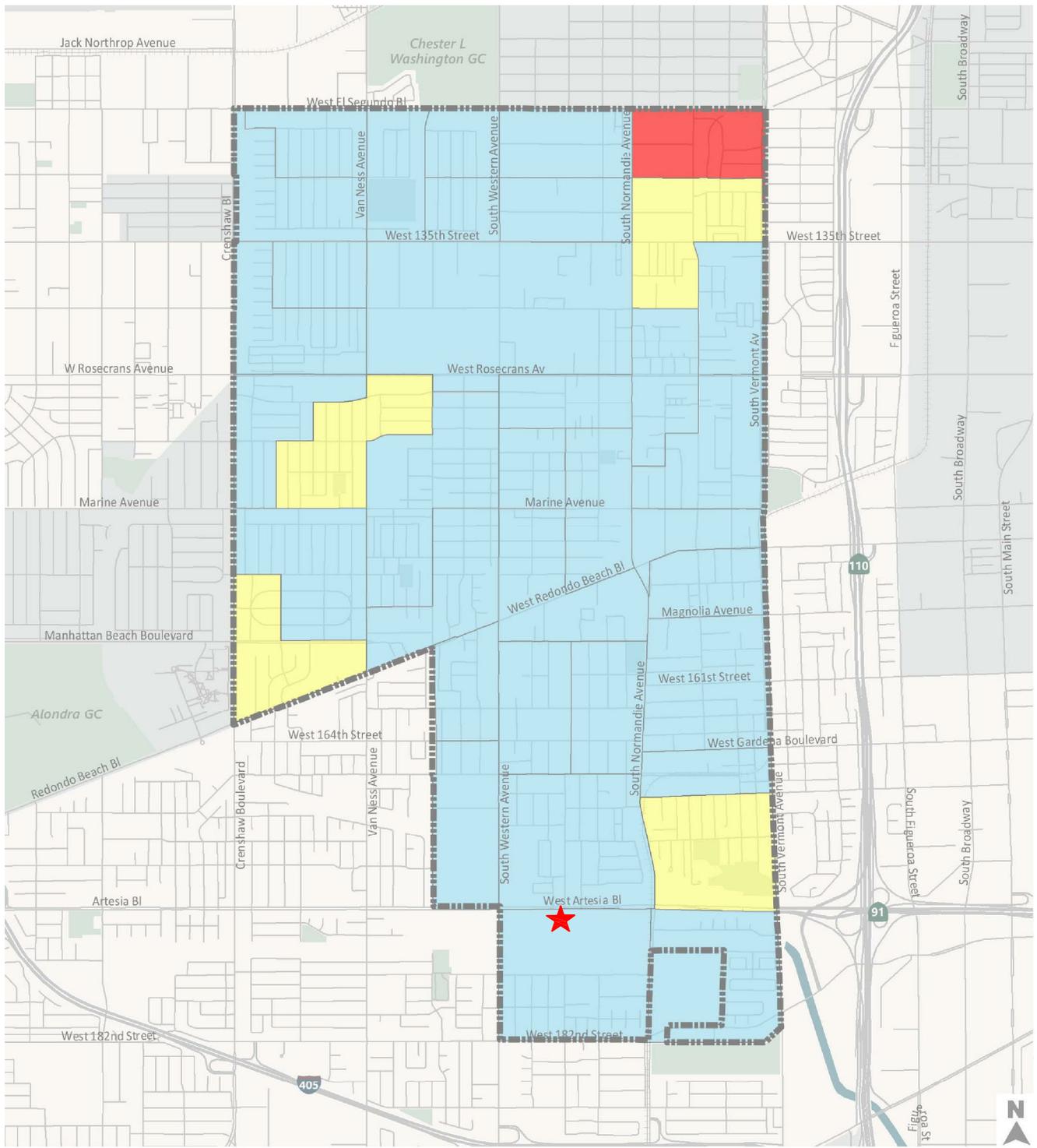
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MAP SOURCE: TCA ARCHITECT



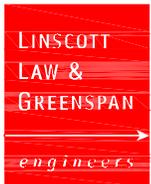
Figure 2
Conceptual Site Plan



- <-15% below SCAG Regional Average
 - 0 to -15% below SCAG Regional Average
 - Higher than SCAG Regional Average
- MAP SOURCE: SCAG



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★ Project Site

Figure 3
SCAG Model (2012)
Daily Residential Home Based VMT per Capita Residential Projects

TPG 1610 Artesia Project

**Table 1
PROJECT TRIP GENERATION FORECAST**

TRIP GENERATION RATES [1]			
ITE LAND USE CATEGORY	ITE LAND USE CODE	VARIABLE	WEEKDAY DAILY
Multifamily Housing (Mid Rise) Not Close to Rail Transit	221	Per Dwelling Unit	4.54
Affordable Housing - Income Limits	223	Per Dwelling Unit	4.81

PROJECT TRIP GENERATION FORECAST			
LAND USE	ITE LAND USE CODE	SIZE	DAILY TRIP ENDS [2] VOLUMES
<i>Proposed Project</i>			
Apartment	221	283 DU	1,285
Affordable Housing	223	17 DU	82
<i>Subtotal Proposed Project</i>			<i>1,367</i>
<i>Existing Uses</i>			
Automobile Care Center	[3]	(31,010) GSF	(822)
<i>Subtotal Existing Uses</i>			<i>(822)</i>
<i>NET NEW PROJECT TRIPS</i>			<i>545</i>

[1] Source: ITE "Trip Generation Manual", 11th Edition, 2021.

[2] Trips are one-way traffic movements, entering or leaving.

[3] Based on traffic counts conducted at the existing site driveways on May 2023.