

Memorandum

To: Amanda Acuna, Senior Planner, City of Gardena

From: Mehul Champaneri
Rita Garcia

Re: **Vehicle Miles Traveled (VMT) Assessment**
1450 Artesia Blvd, Gardena CA

Date: December 5, 2023

This memorandum documents SB 743 compliant analysis completed for the proposed mixed-use development at 1450 Artesia Boulevard (“Project”) in the City of Gardena (City), CA. The proposed development would include a self-storage use (four levels totaling 186,000 GSF with 1,480 storage units) and an industrial use (one level totaling 72,000 GSF plus ten loading docks). Additionally, the City is proposing to host various special events on an approximately 36,000-square-foot portion (0.8 acre) of the industrial use’s parking area (over approximately 62 of the total 124 parking spaces). The special events would be held approximately two to three times per month, including weekday evening events (after 6 PM) and weekend daytime events. Thus, the special events would be held when the industrial use is not in operation and its parking area is not in use. The Project site location is shown in **Exhibit 1**.

With the passage of SB 743, Vehicle Miles Travelled (VMT) has become an important indicator for determining if 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 Project.

Senate Bill 743 (SB 743)

SB 743 is part of a long-standing policy effort by the California legislature to improve California’s sustainability and reduce greenhouse gas emissions through denser infill development, a reduction in single occupancy vehicles, improved mass transit, and other actions. Recognizing that the current environmental analysis techniques are, at times, encouraging development that is inconsistent with this vision, the legislature has taken the extraordinary step to change the basis of environmental analysis for transportation impacts from Level of Service (LOS) to Vehicle Miles Travelled (VMT). VMT is understood to be a good proxy for evaluating air quality and other transportation related impacts that the State is actively trying to address. While the use of VMT to determine significant transportation impacts has only been considered recently, it is by no means a new performance metric and has long been used as a basis for transportation system evaluations and as an important metric for evaluating the performance of Travel Demand Models.

In January 2019, the Natural Resources Agency finalized updates to the State CEQA Guidelines including the incorporation of SB 743 modifications. The State CEQA Guidelines’ changes were approved by the Office of Administrative Law and are now in effect. Specific to SB 743, Section 15064.3(c) states, “A lead agency may elect to be governed by the provisions of this section immediately. The provisions apply statewide as of July 1, 2020.

In June 2020, the City developed new guidelines and procedures for transportation analysis as part of the SB 743 implementation, including the selection of VMT analysis methodology, setting thresholds of significance, and potential mitigations.

The City's VMT thresholds consider the VMT performance of residential, employment-based and regional-serving components of a project separately, using the efficiency metrics of home-based VMT per capita, work VMT per employee and total VMT per service-population, respectively. The City VMT thresholds of significance are summarized below for each of these components:

- Residential – 15% below baseline regional VMT per Capita
- Office & Industrial – 15% below baseline regional VMT per Employee
- Retail – No net increase in VMT

VMT Analysis

VMT Analysis Methodology

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

- Industrial
- Self-Storage
- Special Events Venue

The Project's VMT analysis was conducted for CEQA purposes in accordance with the City's adopted VMT standards and thresholds (VMT Guidelines). The steps in this VMT analysis were as follows:

- Conduct a screening analysis to identify proposed land uses that could be screened out of a detailed VMT analysis, either due to project type, being in a low VMT area or in a high-quality transit area.
- Determine VMT impacts of land uses that are not screened out through the screening criteria.
- Develop mitigation measures that could be implemented if a project would exceed the significance threshold for VMT impacts.

VMT Screening

The City VMT Guidelines provides details on appropriate screening thresholds that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed level VMT analysis. Screening thresholds are broken into the following three steps.

1. Project Type Screening

Projects that generate less than 110 daily trips, local-serving retail projects less than 50,000 square feet, and affordable housing projects may be screened from conducting a VMT analysis.

The AM and PM peak hour daily trips were estimated for the Project using the trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition. The ITE Land Use Code, trip generation rates, and estimated trips that would be generated by the Project are presented in **Table 1** for Opening Year (2025) Project Conditions when the site would be fully operational.

Table 1: Project Trip Generation

ITE Code	Land Use	Size	Units	Daily Trips	AM Peak			PM Peak		
					In	Out	Total	In	Out	Total
Trip Generation Rates*										
110	General Light Industrial	-	KSF	4.870	0.651	0.089	0.74	0.091	0.559	0.65
151	Mini-Warehouse	-	Storage Units (100s)	17.960	0.617	0.593	1.21	0.840	0.840	1.68
710	General Office Building	-	KSF	10.840	1.338	0.182	1.52	0.245	1.195	1.44
Trip Generation Estimates										
110	General Light Industrial	72.00	KSF	351	47	6	53	7	40	47
151	Mini-Warehouse	14.80	Storage Units (100s)	266	9	9	18	12	12	24
710	General Office Building	10.00	KSF	108	13	2	15	2	12	14
Total Proposed Project Trips				725	69	17	86	21	64	85
Existing Land Use Trips**				147	3	0	3	9	8	17
Net Proposed Project Trips				578	66	17	83	12	56	68

* Source: Institute of Transportation Engineers Trip Generation Manual, 11th Edition.

** Source: Existing counts collected May 2022.

As shown in **Table 1**, the proposed Project is forecast to generate approximately 725 average daily trips, including 86 AM peak hour trips and 85 PM peak hour trips. When the trips generated by the existing land uses (to be removed) are subtracted from the proposed Project trip generation estimates, the Project would generate 578 net average daily trips, including 83 AM peak hour trips and 68 PM peak hour trips.

The Project’s industrial and self-storage land use components are estimated to generate more than 110 daily vehicle trips, thus the industrial and self-storage uses are not screened out initially based on Project Type screening. The Project’s office component is estimated to generate less than 110 daily vehicle trip, hence it will be screened out.

The Project’s special event component is proposed on an approximately 36,000 square-foot portion of the Project site that will host several medium-sized events which mainly falls within the retail category of land uses such as farmer’s market, food truck, food giveaways, car shows etc. Therefore, only the Project’s special event component is screened out based on the Project Type screening.

2. Transit Proximity Screening

As described in the City VMT Guidelines, projects located within a High-Quality Transit Area (HQTA) would be screened from a detailed VMT analysis if the project does not have certain characteristics. This screening criteria cannot be applied if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75 (for office and industrial projects)
- Includes more parking for use by residents, customers, or employees than required by the City (unless additional parking is being provided for design feasibility, such as completing the floor of a subterranean or structured parking facility, or if additional parking is located within the project site to serve adjacent uses).
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City).
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units

According to Figure 3 in the City's VMT Guidelines, the Project site is located in a frequent transit area (within a half-mile radius of an existing or planned major transit stop, or an existing stop along a high-quality transit corridor, which has fixed route bus service with service intervals no longer than 15 minutes during peak commute hours). In addition, this Project would meet the other criteria necessary to screen out due to transit proximity.

- Industrial uses will have FARs of at least 0.75.
- The City has indicated that supplying parking in excess of minimum requirements would be prohibited.
- The Project is consistent with the Southern California Association of Governments (SCAG) Sustainable Communities Strategy (SCS) since the proposed number jobs are less than the total future jobs assumed for the project zone.
- Project would not replace residential units.

Based on the City's Guidelines, the Transit Proximity Screening is applicable to office, retail, hotel, industrial and residential projects. The guidelines do not specifically address the screening criteria for self-storage land uses. Additionally, the primary mode of transportation for self-storage units is expected to be automobiles, thus the proximity to transit is not applicable to this land use. Therefore, only the Project's industrial use can be screened out under the transit proximity screening criteria.

3. Low VMT Area Screening

Projects that are assessed using home-based work VMT per employee (such as industrial) in a low-VMT generating area may be screened from a VMT analysis. According to Figure 1 in the City VMT Guidelines, the Project site was not screened out under the low VMT area screening criteria.

Screening Analysis Results

Based on the VMT screening, the Project's special events components would screen out of a VMT analysis based on project type screening criteria and would result in a less-than-significant VMT impact. The industrial use of the project would screen out of a VMT analysis based on transit proximity screening criteria and would result in a less-than-significant VMT impact. The office component would screen out as it is projected to generate less than 110 daily trips. The self-storage components of the project would not screen out initially based on the three screening criteria and would require a VMT analysis. Therefore, a VMT impact analysis was conducted for the self-storage use.

VMT Impact Analysis

The primary source of VMT for self-storage units is customers, therefore the travel characteristics of self-storage units are similar to that of retail uses. Since the total gross area of the proposed self-storage is more than 50,000 square-feet and cannot be screened out of VMT analysis, a separate VMT analysis was conducted considering the net change in VMT as a threshold. According to the City's guidelines, the following VMT impact thresholds are applicable to self-storage uses:

- **Project Threshold:** A significant impact would occur if the project results in a net increase in total VMT.
- **Cumulative Threshold:** A significant impact will occur if the project threshold is exceeded or if the project is determined to be inconsistent with the SCAG SCS.

Self-Storage use VMT Impact Analysis

Similar to retail stores, typical self-storage units such as the proposed project most often serve pre-existing needs (i.e., the self-storage does not generate new trips because it meets existing demand) because their customers are using the facility not because of the features offered by the self-storage, but because of the area the self-storage is located in. Usually, self-storage offers similar features and pricing in the same area. Thus, it is assumed that someone will travel to a newly constructed typical self-storage because of its proximity to the area attraction, rather than the proposed self-storage fulfilling an unmet need. Typical self-storage most often can be presumed to reduce trip lengths when a new self-storage is introduced within a cluster of existing self-storages located near a local neighborhood. Thus, the impact to the transportation system would be negligible or reduced by the introduction of a new self-storage use to an area where people are already traveling and planning on storing goods. Self-storage units do not attract any new trips other than need of storage which is fulfilled by local storage units.

While a specific market study for the proposed self-storage use was not conducted as part of this memorandum, a map showing the proximity of other similar self-storage facilities is provided as **Exhibit 2**. A half-mile buffer was placed around the eight existing self-storage facilities in the area and the Project to illustrate the lack of overlapping service area between the Project and the existing self-storage uses. As shown in **Exhibit 2**, the Project will reduce trip lengths by adding self-storage opportunities into the local area, reducing proximity to self-storage services for users. Therefore, in accordance with the City's VMT guidelines, it is assumed that the Project will result in a VMT reduction and support the goals of SB 743.

Conclusion

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

- The proposed industrial land use would screen out of a VMT analysis based on the City's transit proximity screening criteria, and would result in a **less-than-significant VMT impact**.
- The proposed office land use would screen out of a VMT analysis based on daily trip generation and would result in a **less-than-significant VMT impact**.
- The proposed special event land uses are customer-based land uses that can be categorized as local-serving retail uses. Therefore, the special event land uses can be screened out based on the City's project type screening as well as transit proximity screening criteria and would result in a **less-than-significant VMT impact**.
- The proposed self-storage use is customer-based land use that would result in net decrease in regional VMT. Therefore, the self-storage use would result in a **less-than-significant VMT impact**.
- The proposed project was checked against the SCAG Regional Transportation Plan 2016 (RTP2016) 2040 forecasts, and the project is included in the future growth in the SCAG forecasts. Therefore, the cumulative VMT impacts are considered less than significant.

Exhibit 1: Project Site Location

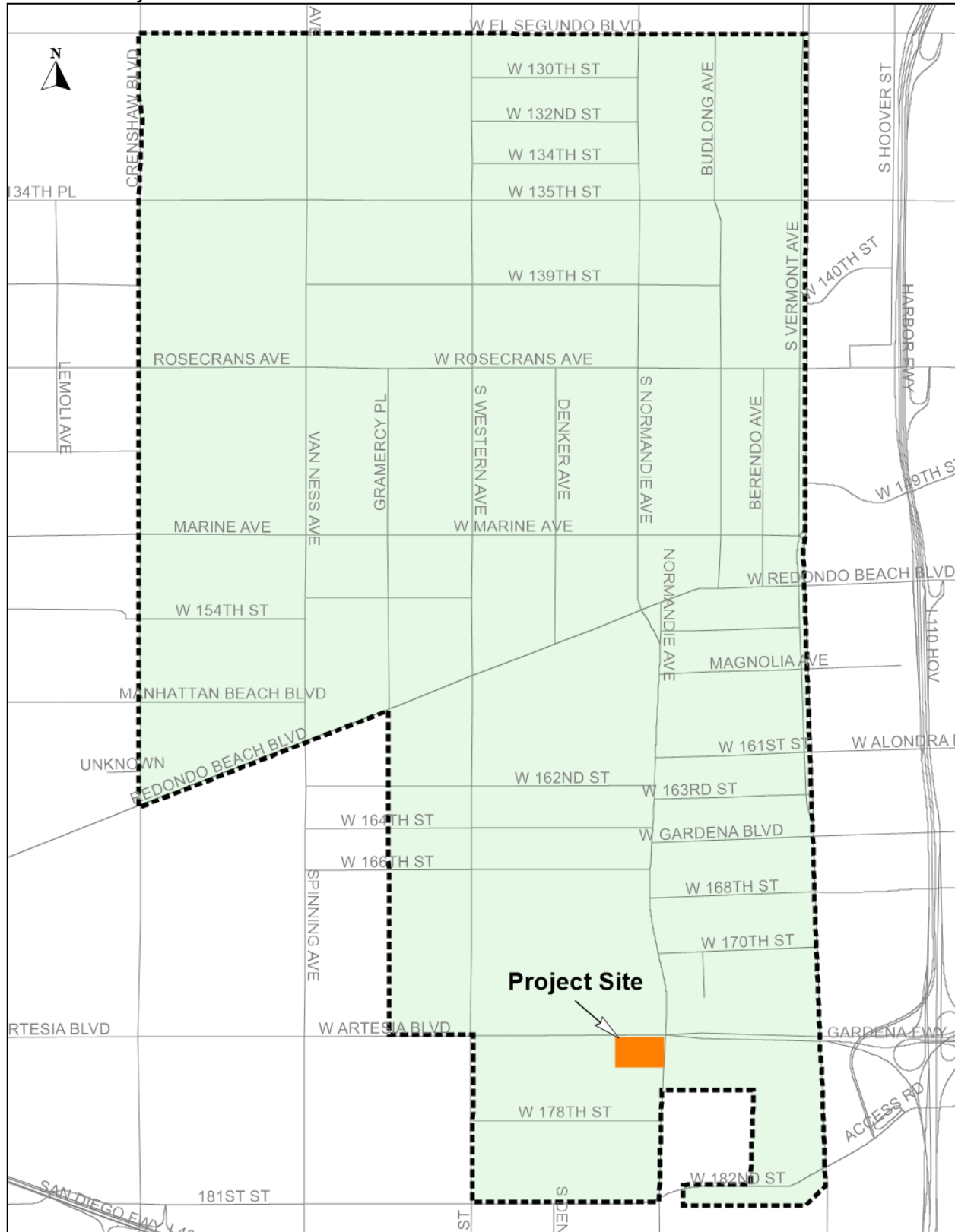


Exhibit 2: VMT Results and Project Site Location

