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Date:	June 23, 2023
Prepared by:	Abby Pal, Mark Polunin
To:	City of Carson
Site:	1210 – 1250 E 223rd Street Warehouse Project
Subject:	Transportation Impact Analysis Screening

This technical memorandum evaluates the need to prepare a Level of Service (LOS) and Vehicle Miles Traveled (VMT) analysis for the proposed warehouse building located at 1210 – 1250 E 223rd Street in the City of Carson. The existing site, Coral Tree Business Center, comprises three buildings which provide flex spaces for several businesses and are currently occupied with uses such as trade contractors, warehouse/logistics, small offices, eatery, chapels, etc. The gross floor area of the business center is 135,520 square feet (SF). The proposed project will demolish the existing buildings and construct a single industrial building totaling 181,013 SF. Access to the site will be provided via the two driveways located on 223rd Street and the third driveway located on Lucerne Street. The project site plan is shown in Figure 1.

Project Trip Generation

The project trip generation was prepared using trip rates that were obtained from the Institute of Transportation Engineers, Trip Generation Manual,11th Edition, 2021. ITE land use code 150 (Warehousing) and land use code 110 (General Light Industrial) were used for the proposed use, and land use code 770 (Business Park) was used for the existing land use. Existing trips generated by Coral Tree Business Center on the project site were subtracted from the proposed warehouse project trip generation to obtain net trips that would be generated on the site.

As shown in Table 1, the existing business center on site generates 1,686 daily trips, 183 AM peak hour trips, and 165 PM peak hour trips. The proposed industrial project would contain 20% cold storage warehousing and 80% general light industrial. The cold storage portion generates 100 PCE daily trips, 10 PCE AM peak hour trips and 12 PCE PM peak hour trips. The general light industrial portion generates 1,006 PCE daily trips, 153 PCE AM peak hour trips and 134 PCE PM peak hour trips. Overall, the proposed project would generate net 580 fewer PCE daily trips, net 19 fewer PCE AM peak hour trips, and net 19 fewer PCE PM peak hour trips.

California Environmental Quality Act (CEQA) Transportation Impact Analysis Screening

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating Transportation impacts. SB743 specified that the new criteria should promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. The bill also specified that delay-based level of service could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3 - Determining the Significance of Transportation Impacts states that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. Section 15064.3(c) state the provisions of the section and were applicable statewide since July 1, 2020.

The County of Los Angeles adopted their Transportation Impact Analysis (TIA) Guidelines on July 23, 2020. The TIA Guidelines include analysis methodology, impact thresholds, and screening thresholds to determine

if projects would require a TIA analysis. The County's TIA Guidelines provide criteria for projects that would be considered to have a less-than significant impact on VMT and therefore could be screened from further analysis. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and a TIA would not be required:

Screening Criteria

1. A Non-Retail project that generates less than 110 daily vehicle trips.
2. A Retail project contains retail uses that does not exceed 50,000 square feet of gross floor area.
3. The project is located within a Transit Priority Area (TPA).
4. A Residential project where 100% of the units, excluding manager's unit, are set aside for lower income households.

The applicability of each Screening Criteria to the proposed project is discussed below.

Screening Criteria 1 – Non-Retail Project Trip Generation Screening Criteria: According to the County's guidelines, non-retail development projects that generate less than 110 daily vehicle trips are considered to have a less than significant VMT impact.

As shown in Table 1, the existing business center on site generates 1,686 daily trips, 183 AM peak hour trips, and 165 PM peak hour trips. The proposed industrial project generates 1,106PCE daily trips, 164 PCE AM peak hour trips and 146 PCE PM peak hour trips. Overall, the proposed project would generate net 580 fewer PCE daily trips, net 19 fewer PCE AM peak hour trips, and net 19 fewer PCE PM peak hour trips. According to this screening criteria, a conclusion can be made that the project would have a less than significant impact on VMT and would therefore screen from the requirement to prepare a TIA including VMT analysis since the number of daily vehicle trips is fewer than 110 daily trips.

Screening Criteria 2 – Retail Project Site Plan Screening Criteria: The County's guidelines state that retail projects containing retail uses that do not exceed 50,000 square feet of gross floor area are considered to have a less than significant VMT impact. Since this project is not a retail project, Screening Criteria 2 would not apply.

Screening Criteria 3 – Proximity to Transit Based Screening Criteria: According to the County's guidelines, projects located in a TPA may be presumed to have a less than significant impact. The project is not located in a TPA, therefore the project would not satisfy the requirements of Screening Criteria 3.

Screening Criteria 4 – Residential Land Use Based Screening Criteria: According to the County's guidelines, residential projects are considered to have a less than significant VMT impact if 100% of the units, excluding manager's unit, are set aside for lower income households. Since this project is not a residential project, Screening Criteria 4 would not apply.

Site Access Studies Screening

As per the *Los Angeles County Public Works Transportation Impact Analysis Guidelines* development projects would not be required to prepare an operational analysis if a project is screened from the requirement to prepare a Transportation Impact Analysis study. The proposed project screens from this requirement as the net project trip generation is less than 110 daily trips. Therefore, no operational site access studies would be required for the proposed project.

Summary

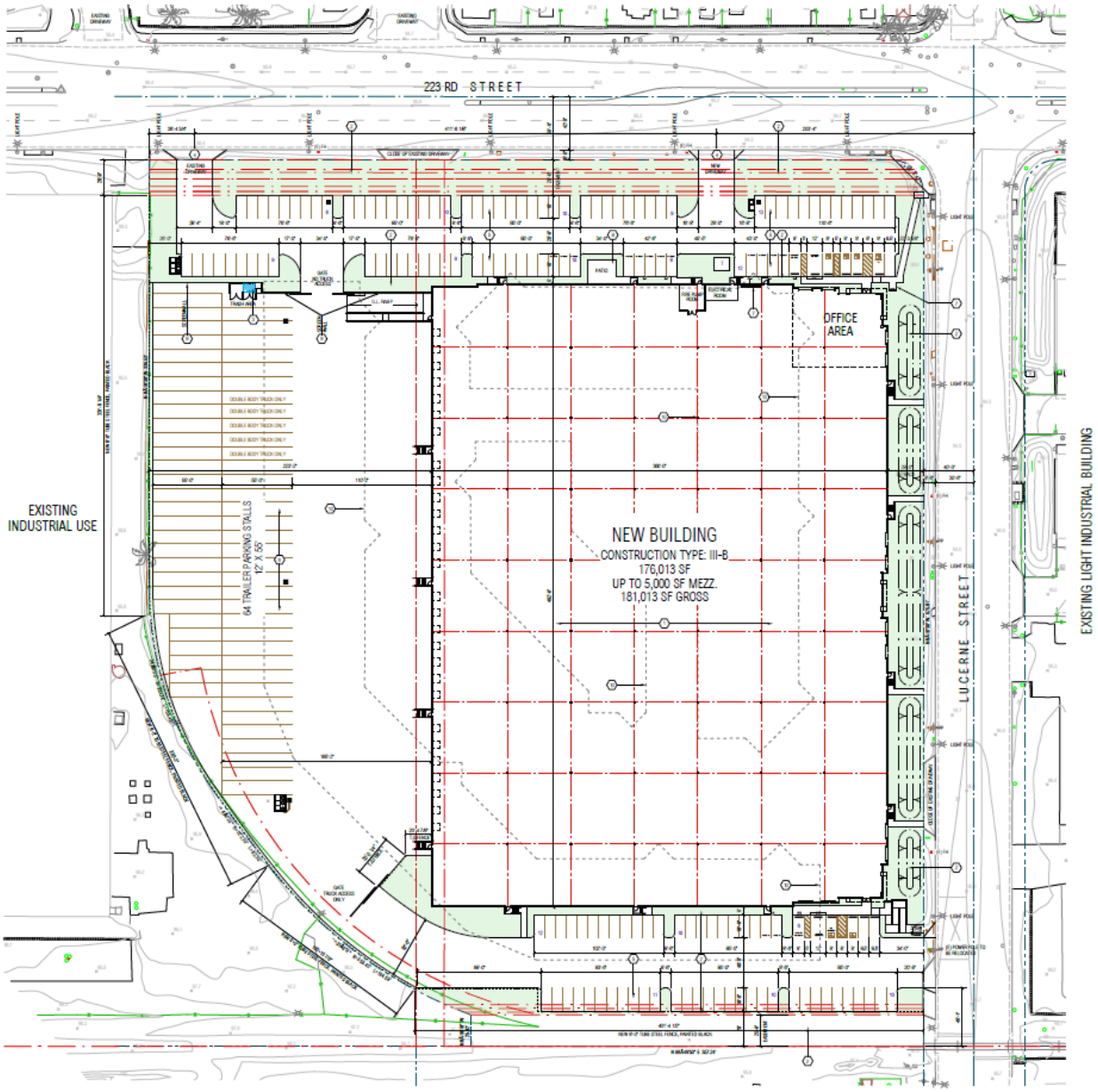
As shown in Table 1, the proposed project would generate net 580fewer PCE daily trips, net 19 fewer PCE AM peak hour trips, and net 19 fewer PCE PM peak hour trips than the existing land use. EPD Solutions used the County of Los Angeles TIA screening thresholds to determine if this project would require a vehicle miles traveled (VMT) analysis. If a project meets the following criteria, then the VMT impact of the project is considered less-than significant and no TIA would be required:

1. A Non-Retail project that generates less than 110 daily vehicle trips.
2. A Retail project contains retail uses that does not exceed 50,000 square feet of gross floor area.
3. The project is located within a Transit Priority Area (TPA).
4. A Residential project where 100% of the units, excluding manager's unit, are set aside for lower income households.

The project would not meet Criteria 2, 3, or 4. However, the project is expected to generate net 580 fewer PCE daily trips vehicle trips than the existing land use, which is less than the County's threshold of 110 daily vehicle trips; therefore, Screening Criteria 1 is satisfied, and no TIA would be required. Furthermore, operational site access analysis would not be required as per the County TIA guidelines as the project would screen from the requirement to submit a Transportation Impact Analysis study.

If you have any questions about this information, please contact me at (412)636-2713 or abby@epdsolutions.com.

Figure 1: Project Site Plan



Source: RGA Architectural Design

Table 1: Existing and Proposed Trip Generation

				AM Peak Hour			PM Peak Hour		
Land Use		**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Trip Rates									
Business Park[1] (770)		TSF	12.44	1.15	0.20	1.35	0.32	0.90	1.22
Warehousing[2] (150)		TSF	1.71	0.13	0.04	0.17	0.05	0.13	0.18
General Light Industrail[3] (110)		TSF	4.87	0.65	0.09	0.74	0.09	0.56	0.65
Existing Site Trip Generation									
Coral Tree Business Center[1]	135.52	TSF	1,686	156	27	183	43	122	165
Proposed Project Trip Generation	181.013	TSF							
Proposed Cold Storage Warehouse (20%)[2]	36.203	TSF	62	5	1	6	2	5	7
Vehicle Mix[5]		***Percent***							
Passenger Vehicles		55.3%	34	3	1	4	1	3	4
2-Axle truck		15.5%	10	1	0	1	0	1	1
3-Axle truck		4.9%	3	0	0	0	0	0	0
4+-Axle Trucks		24.3%	15	1	0	1	1	1	2
Total Trip Generation		100.0%	62	5	1	6	2	5	7
PCE for warehouse[4]									
Passenger Vehicles		1.0	34	3	1	4	2	2	4
2-Axle Trucks		1.5	14	1	0	1	0	1	2
3-Axle Trucks		2.0	6	0	0	1	0	0	1
4+-Axle Trucks		3.0	45	4	1	4	3	4	5
Total PCE Trip Generation			100	8	2	10	5	7	12
Proposed General Light Industrial (80%)[3]	144.81	TSF	705	94	13	107	13	81	94
Vehicle Mix[6]		***Percent***							
Passenger Vehicles		72.5%	511	69	9	78	9	59	68
2-Axle Trucks		4.6%	32	4	1	5	1	4	5
3-Axle Trucks		5.7%	40	5	1	6	1	4	5
4+-Axle Trucks		17.2%	122	16	2	18	2	14	16
Total Trip Generation		100.0%	705	94	13	107	13	81	94
PCE for warehouse[4]									
Passenger Vehicles		1.0	511	69	9	78	9	59	68
2-Axle Trucks		1.5	49	6	1	7	1	6	7
3-Axle Trucks		2.0	80	11	1	12	2	8	10
4+-Axle Trucks		3.0	366	49	7	56	7	42	49
Total PCE Trip Generation			1,006	135	18	153	19	115	134
Total Proposed Trip Generation			1,106	143	20	164	24	122	146
Net Trip Generation			**-580**	**-13**	**-7**	**-19**	**-19**	**0**	**-19**

TFS = Thousand Square Feet

PCE = Passenger Car Equivalent

[1] Trip rate from the Institute of Transportation Engineers, Trip Generation Manual,11th Edition, 2021. Land Use Code 770 - Business Park

[2] Trip rate from the Institute of Transportation Engineers, Trip Generation Manual,11th Edition, 2021. Land Use Code 150 - Warehousing.

[3] Trip rate from the Institute of Transportation Engineers, Trip Generation Manual,11th Edition, 2021. Land Use Code 110 - General Light Industrial.

[4] Passenger Car Equivalent (PCE) factors from San Bernardino County CMP, Appendix B - Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, 2016

[5] Vehicle Mix from the Warehouse Truck Trip Study Data Results and Usage, July 17, 2014. With Cold Storage

[6] Vehicle Mix from the Warehouse Truck Trip Study Data Results and Usage, July 17, 2014. Without Cold Storage