

Draft Memorandum

Date: October 16, 2024
To: Darren Embry, 21611 Perry St, LLC
From: Miguel Núñez and Dylan Di, Fehr & Peers
Subject: **21611 Perry Street Residential Project CEQA Assessment**

LB24-0125

Project Description

The proposed Project analyzed in this study involves the construction of 62 townhome dwelling units at the northwest corner of Carson Street & South Perry Street. In addition to the 62 dwelling units the project will provide 150 parking spaces (124 spaces in private garages and 26 open parking spaces) and an internal roadway system providing access to the individual units. Project access will be provided via a single full access driveway on Perry Street, roughly midway between Carson Street and 216th Street. The site plan is shown in **Figure 1**. The purpose of this memorandum is to document the approach for determining potential significance of the Project's transportation related environmental effects per CEQA Guidelines Section 15064.

CEQA Assessment

CEQA Guidelines Section 15064 provides guidance for the process and approaches that may be used for determining environmental effects. Per Section 15064 (f)(7), the provisions of Section 15162 apply "when the project being analyzed is a change to, or further approval for, a project for which an Environmental Impact Report (EIR) or negative declaration was previously certified or adopted." The Project approval is proposed as an addendum to the General Plan EIR, which analyzed the potential for residential development at this site.

CEQA Guidelines Section 15162 states that "when an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following":



1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted.

Transportation Related Qualifications

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects

Fehr & Peers reviewed the General Plan EIR and related information such as the City's zoning map, City of Carson Transportation Analysis Guidelines, and Southern California Association of Governments (SCAG) travel demand model land use inputs for the Project area used for the recent Carson 2040 General Plan (the "General Plan") EIR. The General Plan EIR transportation section identified significant impacts associated with home-based per capita VMT and total VMT per service population. The home-based per capita VMT impact was mitigated to a level below significance with various strategies. The total VMT per service population impact was determined to be significant and unavoidable. Additionally, since the City of Carson could not demonstrate a reduction of 15 percent or more for total VMT per service population, the General Plan makes an incremental but significant contribution to a cumulative regional impact. In addition, the General Plan found no significant transportation impacts related to inadequate emergency access, substantial increase in hazards due to a geometric design feature, or conflict with adopted circulation program, plan, ordinance, or policy.

The site is designated by the General Plan as Corridor Mixed Use, which allows active commercial uses and residential uses. The General Plan EIR analysis and significant impacts related to VMT are based on the SCAG model and General Plan land uses, and VMT methodologies and thresholds of significance adopted by the City of Carson. The General Plan analysis forecasted increases in residential unit and population growth in the project vicinity and the Project is within the analyzed level of growth. As described above, the General Plan EIR disclosed transportation impacts relating to VMT and this project does not exceed the development density or intensity contemplated by the General Plan and therefore and would not require major revisions to the prior EIR due to new significant increase in the severity of identified impacts.



The General Plan EIR also analyzed the other transportation related CEQA areas and did not find a significant impact and the Project is consistent with those conclusions as discussed below:

- Conflict with adopted circulation program, plan, ordinance, or policy: The General Plan EIR analysis reviewed programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities and found no conflicts. The project is consistent with City policies, programs, and ordinances such as increasing residential housing near corridors with transit, promoting active transportation, and directing commuter traffic to arterial streets and collectors, as appropriate. The project would be consistent with City ordinances and would not preclude the implementation of a policy or projects identified in the City's Bike Plan.
- Substantially increasing hazards due to a geometric design feature: The General Plan EIR analysis found no significant impact for this issue area and discusses the design of access points, addressing or reducing potential conflict points of various users, and considering the relation of land uses and road users including commercial and truck traffic, commuter traffic, pedestrians, and cyclists. Review of project access is conducted for each individual project to confirm compliance with City standards and address the provision of adequate sight distance, sidewalks, and traffic control to minimize potential negative effects. The Project will have one driveway that aligns with the existing driveway location and sidewalks. The project will utilize an existing driveway and there are no additional proposed changes to the access that would introduce geometric design features that would substantially increase hazards due to a geometric change.
- Result in inadequate emergency access: The General Plan EIR reviewed emergency accessibility at a programmatic level and determined the update would not result in inadequate emergency access. The project is located at the northeast corner of Peery Street & Carson Street, which are respectively two and four-lane corridors fronting the project site. The project will not make alterations to the public right-of-way or physical environment that would negatively impact emergency access to the site or along the adjacent corridors.

As described above, known changes to the project from what was previously analyzed, would not contribute to increased VMT and would not lead to a more severe adverse impact since the certification of the General Plan Final EIR and the adoption of the General Plan in April 2023. Therefore, the Project is consistent with the General Plan EIR analyses and would not result in new significant effects or an increase in the severity of previously identified significant effects due to changes in the project.



2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects

The Project site is adequately sized to accommodate internal circulation and proposed units consistent with the City's requirements. There are no atypical aspects of the Project or parcel that are anticipated to have specific or additional transportation related environmental effects associated with the Project compared with the General Plan.

The General Plan EIR transportation section identified significant impacts associated with home-based per capita VMT and total VMT per service population. The home-based per capita VMT impact was mitigated to a level below significance with various strategies. The total VMT per service population impact was determined to be significant and unavoidable. Additionally, since the City of Carson could not demonstrate a reduction of 15 percent or more for total VMT per service population, the General Plan makes an incremental but significant contribution to a cumulative regional impact.

The General Plan EIR also analyzed the other transportation related CEQA areas and did not find a significant impact. The circumstances under which the Project is undertaken are consistent with those conclusions as discussed below.

- Conflict with adopted circulation program, plan, ordinance, or policy: The General Plan EIR analysis reviewed programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities and found no conflicts. The project is consistent with City policies, programs, and ordinances such as increasing residential housing near corridors with transit, promoting active transportation, and directing commuter traffic to arterial streets and collectors, as appropriate. The project would be consistent with City ordinances and would not preclude the implementation of a policy or projects identified in the City's Bike Plan. Therefore, no additional impacts from conflicts with program, plan, ordinance, or policy would be expected to occur to the circumstances under which the project is undertaken.
- Substantially increasing hazards due to a geometric design feature: The General Plan EIR analysis found no significant impact for this issue area and discusses the design of access points, addressing or reducing potential conflict points of various users, and considering the relation of land uses and road users including commercial and truck traffic, commuter traffic, pedestrians, and cyclists. The project will utilize an existing driveway and there are no substantial changes to the access that would introduce geometric design features that would substantially increase hazards due to a geometric change.
- Result in inadequate emergency access: The General Plan EIR reviewed emergency accessibility at a programmatic level and determined the update would not result in inadequate emergency access. The project is located at the northwest corner of South



Perry Street & Carson Street, which are respectively two and four-lane streets fronting the project site. The project will not make alterations to the public right-of-way or physical environment that would negatively impact emergency access to the site or along the adjacent corridors.

Because the General Plan EIR identified a mitigable home-based per capita VMT impact and a significant and unavoidable total VMT per service population impact, the Project would not result in substantial changes occur with respect to the circumstances and new or more severe significant environmental effects identified in the General Plan EIR.

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(a). The Project will have one or more significant effects not discussed in the previous EIR or negative declaration.

As described in the prior sections, the Project does not exceed the density or intensity studied in the General Plan and would comply with City ordinances and policies. There is no substantial new information or unique aspects of the project which would lead to additional impacts since the certification of the General Plan Final EIR and the adoption of the General Plan in April 2023. Therefore, the Project would not be expected to have significant effects not discussed in the General Plan EIR.

High and low VMT maps were prepared when the City's Transportation Study Guidelines were developed. The maps indicate that this site is located in a portion of Carson where daily home-based VMT per capita is 14.1, which is two percent less than the City average of 14.4, indicating the site is in a lower VMT area compared with the City's per capita average VMT for residential land uses. The project would not conflict with or preclude the implementation of mitigations discussed in the EIR.

(b). Significant effects previously examined will be substantially more severe than shown in the previous EIR.

As described in the prior sections, there is no substantial new information which would lead to more severe impacts since the certification of the General Plan Final EIR and the adoption of the General Plan in April 2023. As discussed above, this project is located in an area that exhibits a reduction relative to the City's average per capita VMT for residential uses. Therefore, the Project would not be expected to have any more severe adverse impacts related to transportation due to new information.



(c). Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives.

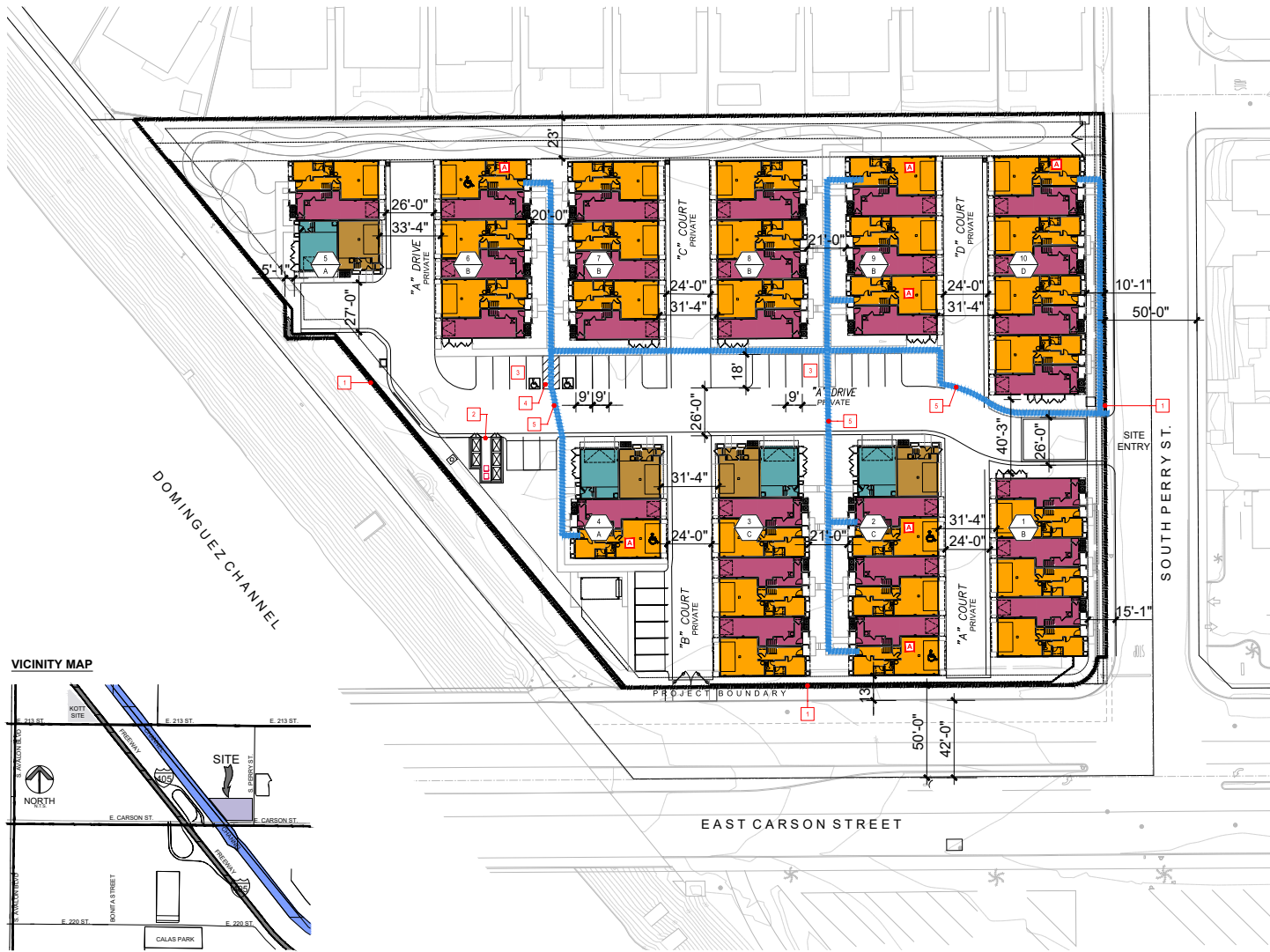
The General Plan EIR transportation section identified significant impacts associated with home-based per capita VMT and total VMT per service population. The home-based per capita VMT impact was mitigated to a level below significance with various strategies. The total VMT per service population impact was determined to be significant and unavoidable. All mitigation measures analyzed in the General Plan EIR were feasible. There is no new information to inform that the impacts of mitigation measures have changed since the adoption of the General Plan in April 2023. Therefore, the Project will not have mitigation measures previously found not to be feasible in fact be feasible.

(d). Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As described in the prior sections, the home-based per capita VMT impact was mitigated to a level below significance with various strategies, and the total VMT per service population impact was determined to be significant and unavoidable. The General Plan EIR adopted all feasible mitigation measures analyzed. There is no new information to inform that any mitigation measures or alternatives that were considerably different from those analyzed in the previous EIR would substantially reduce any significant effects. Therefore, the Project will not have mitigation measures considerably different from those analyzed in the previous EIR.

Conclusion

The Project does not exceed the development density or intensity contemplated by the General Plan and therefore would comply with City ordinances and policies. Furthermore, the Project would not be expected to have additional adverse impacts related to transportation that were not analyzed in the General Plan EIR where the project is located in an area that exhibits lower than City average per capita VMT for residential land uses. There is no new or unique information pertaining to the project or mitigation measures identified in the General Plan EIR that result in new information that would trigger new or more severe impacts. Therefore, the Project would be eligible for an addendum to the General Plan EIR, which analyzed the potential for residential development at this site, instead of a full subsequent EIR



Overall Site Summary	
Site Area	2.80 Acres
Total Dwelling Units	62
Gross Density	22.1 Du/Ac
Existing Zoning (Land Use)	Specific Plan Storage
Proposed Zoning (Land Use)	Specific Plan Residential

Building Summary				
Building Type	Quantity	Building Footprint Area	Gross Building Area	
		Area per Bldg	Total Area	Area per Bldg
Building A - 4 Plex	2	2,651 sf	5,302 sf	6,004 sf
Building B - 6 Plex	5	4,377 sf	21,885 sf	13,321 sf
Building C - 8 Plex	2	5,528 sf	11,056 sf	18,888 sf
Building D - 8 Plex	1	5,842 sf	5,842 sf	17,787 sf
Total			44,085 sf	134,199 sf
Building Lot Coverage			36.1%	

Garage Area	27,911 sf
FAR (Using Total Building Area)	1.10
FAR (Excluding Garage Area)	0.87

Unit Plan Summary						
Plan	Bed(s)	Net Unit Area	Quantity	%	Total Net Area	Avg. Unit Size
Rowtowers - P1	2	1,210 sf	4	6.5%		121
Rowtowers - P2	2	1,168 sf	4	6.5%		124
Rowtowers - P3	3	1,525 sf	27	43.5%		155
Rowtowers - P4	4	1,783 sf	27	43.5%		155
Total			62	100%	68,828 sf	1,594 sf

Unit Mix			
	Quantity	%	
2 Bedroom Total	8	12.9%	
3 Bedroom Total	27	43.5%	
4 Bedroom Total	27	43.5%	
Total	62	100.0%	

Parking Summary - State Density Bonus Standard				
Parking Required	Quantity	Ratio Req'd	Spaces Req'd	
2 Bed	8	1.50 Spaces/Unit	12	
3 Bed	27	1.50 Spaces/Unit	41	
4 Bed	27	2.50 Spaces/Unit	68	
Total Residential Parking Req'd		1.95 Spaces/Unit	121	

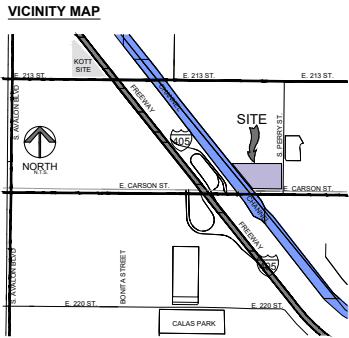
Parking Provided			
	Ratio Provided	Spaces Provided	
Garage Spaces	2.00	124	
Driveway Spaces	0.00	0	
On Site Spaces	0.45	28	
Total Residential Parking Provided	2.45	152	

Open Space Summary		
	Area	Avg. Unit Average
Private Open Space (Decks)	4,722 sf	76 sf/Unit
Common Open Space	29,271 sf	469 sf/Unit
Total Open Space	33,993 sf	545 sf/Unit

- SITE PLAN KEYNOTES**
- PROPERTY LINE
 - ▭ TRASH ENCLOSURE
 - ▭ PERPENDICULAR PARKING SPACE (PK18)
 - ▭ ACCESSIBLE PARKING SPACE (PK18)
 - ACCESSIBLE PATH OF TRAVEL
 - NOTE: ALL NON-ADA COMPLIANT SIDEWALK RAMPS ADJACENT TO THE PROJECT SITE WILL BE UPGRADED TO CURRENT CODE.

LEGEND

- PLAN 1
- PLAN 2
- PLAN 3
- PLAN 4
- PROPERTY LINE
- ACCESSIBLE PATH OF TRAVEL
- ▭ TYPICAL PERPENDICULAR & ACCESSIBLE PARKING SPACE
- ▭ ACCESSIBLE UNIT
- ▲ UNIT ENTRY
- 1 Building Number
- A Building Type



PERRY STREET
CARSON, CA #2024-0578

SCHEMATIC DESIGN
OCTOBER 03, 2024

SITE KEY MAP & INFORMATION

A1.0



Source: KTG Architecture+Planning, 21611 Perry St, LLC

Figure 1
Site Plan

Draft Memorandum

Date: January 20, 2025
To: 21611 Perry St, LLC
From: Miguel Núñez and Dylan Di, Fehr & Peers
Subject: **21611 Perry Street Residential Project Traffic Memo: Non-CEQA Trip Generation Comparison**

LB24-0125

This memorandum provides an evaluation of the trip generation estimates for the proposed 21611 Perry Street Residential Project (the "Project") in compliance with the City of Carson's transportation analysis requirements outside of the California Environmental Quality Act (CEQA), which will be addressed in a separate document. The previous project proposed at 21611 South Perry Street was a self-storage/mixed-use project (the "2022 Project") studied in the *21611 South Perry Street Local Transportation Assessment (LTA)* prepared by Fehr & Peers in January 2022.

This memorandum includes an assessment of the trip generation estimates of the Project, evaluates trip generation estimates relative to the City's threshold for analysis, and compares the Project's estimated trip generation envelope against the 2022 Project's LTA in order to determine whether any additional intersection analysis would be required.

Project Description

The proposed Project analyzed in this study involves the construction of 62 townhome dwelling units at the northwest corner of Carson Street & South Perry Street. In addition to the 62 dwelling units, the project will provide 150 parking spaces (124 spaces in private garages and 26 open guest parking spaces) and an internal roadway system providing access to the individual units. Project access will be provided via a single full access driveway on Perry Street, roughly midway between Carson Street and 216th Street. The site plan is shown in **Figure 1**.

The 2022 Project involved 117,110 square feet (1,006 storage units) of self-storage warehouse, 2,425 square feet of self-storage office, 700 square feet of retail space, and 1,550 square feet of restaurant space. The LTA for the 2022 Project analyzed the trip generation, intersection level of service, and site access for the previous proposal.



City of Carson Transportation Analysis Guidelines

The City of Carson applies Transportation Analysis Guidelines (TAG) that inform the approach for analyzing and evaluating potential transportation impacts associated with development projects both within the City in a CEQA context and for operational deficiencies in a non-CEQA context. This memo focuses on the non-CEQA considerations from the TAG. The threshold for requiring a local transportation assessment with intersection LOS analysis is 110 peak hour trips.

Trip Generation Comparison

Trip generation rates from Trip Generation, 11th Edition (Institute of Transportation Engineers [ITE], 2021) were used to estimate the number of trips associated with the proposed 62-unit development at 21611 Perry Street and are presented in **Table 1**.

As shown in **Table 1**, the trip generation estimates for the proposed Project are 446 daily vehicle trips, 30 AM peak hour vehicle trips, and 35 PM peak hour vehicle trips. The site is currently vacant. A bus stop serving westbound Long Beach Transit Line 4 is located at the northwest corner of Carson Street & Perry Street, adjacent to the Project site. The nearest eastbound bus stop is located at Carson Street & Acarus Avenue, one block to the east. No trip generation credits were applied to the trip generation estimates.

The 2022 Project provided an LTA analyzing six intersections based on estimated trip generation totals of 631 daily, 96 AM peak hour, and 50 PM peak hour net new trips and provided LOS analysis at six intersections to help assess operational conditions near the site, with and without the project. The LTA indicates that the greater trip generation estimates corresponding to the 2022 Project would not cause average vehicle delay at any study intersection to worsen from LOS D or better to LOS E or F, or cause spill over queuing at any study intersection.

As shown in **Table 1**, the Project would generate fewer trips than the previously analyzed 2022 Project. The daily and PM peak hour vehicle trip generation estimates are roughly 30% less, and the AM peak hour vehicle trip generation estimates are roughly 60% lower than what was previously analyzed for this site. Since the Project is estimated to generate less traffic, the prior analysis accounts for the development of the proposed Project and its lower trip generation, which would generate fewer trips and would not have effects on the roadway system beyond what has already been analyzed.

Conclusion

Trip generation rates from Trip Generation, 11th Edition (ITE, 2021) were used to estimate the number of trips associated with the Project and are presented in **Table 1**. The proposed Project trip generation estimates are lower due to changes in proposed land uses relative to what was analyzed for the 2022 Project. The trip generation comparison indicates that the 2022 Project's



LTA analyzed 30% to 60% more trip generation and adequately accounts for the potential traffic effects of the Project. Because this assessment compares the Project to the 2022 Project, the trip generation envelope for the Project is covered by the intersection level of service (LOS) analysis that was previously prepared, there are no changes to the conclusions of previous study, and no additional analysis is required. For the purposes of providing a conservative analysis, no trip generation credits were applied in either analysis.



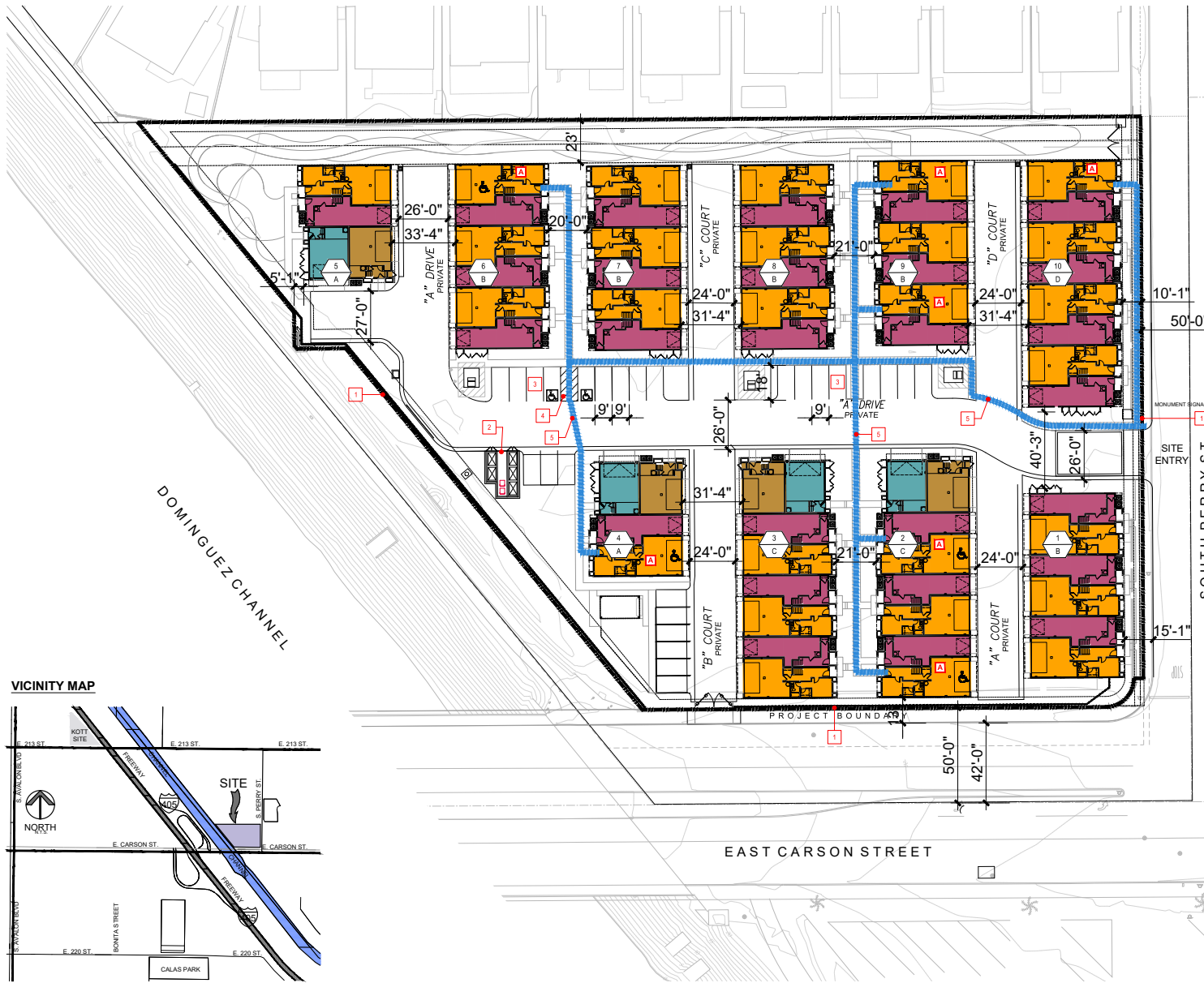
Table 1: 21611 Perry Street 62-Unit Development Trip Generation Estimate

21611 PERRY STREET, CITY OF CARSON DAILY & PEAK HOUR VEHICLE TRIP GENERATION ESTIMATES																	
Land Use	ITE Land Use Code	Size	Trip Generation Rates [a]									Estimated Trip Generation					
			Daily	AM Peak Hour			PM Peak Hour			Daily	AM Peak Hour Trips			PM Peak Hour Trips			
				Rate	In%	Out%	Rate	In%	Out%		In	Out	Total	In	Out	Total	
PROPOSED PROJECT																	
Attached Housing	215	62 du	7.20	0.48	25%	75%	0.57	59%	41%	446	8	22	30	21	14	35	
TOTAL PROJECT EXTERNAL TRIPS										446	8	22	30	21	14	35	
NET NEW TRIPS [b]										446	8	22	30	21	14	35	

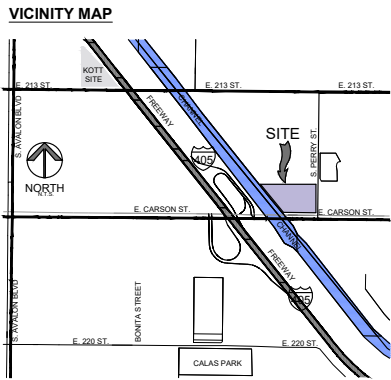
Notes:

[a] Source: Institute of Transportation Engineers (ITE), Trip Generation, 11th Edition, 2021, unless otherwise noted

[b] The site is currently vacant and no trip credits were applied for existing uses or proximity to bus stops.



Overall Site Summary						
Site Area	2.80 Acres					
Total Dwelling Units	82 U					
Gross Density	22.1 Du/Ac					
Existing Zoning / Land Use	Specific Plan / Storage					
Proposed Zoning / Land Use	Specific Plan / Residential					
Building Summary						
Building Type	Quantity	Building Footprint Area (Area per Bldg)	Total Area	Gross Building Area		
Building A - 4 Plex	2	2,835 sf	5,270 sf	18,008 sf		
Building B - 6 Plex	5	4,377 sf	21,885 sf	66,605 sf		
Building C - 8 Plex	2	5,526 sf	11,052 sf	16,898 sf		
Building D - 8 Plex	1	5,842 sf	5,842 sf	17,787 sf		
Total		44,049 sf		134,198 sf		
Building Lot Coverage	36.1%					
Garage Area	27,911 sf					
FAR (Using Total Building Area)	1.10					
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Unit Plan Summary						
Plan	Beds	Net Unit Area	Quantity	%	Total Net Area	Avg. Unit Size
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Unit Mix						
	Quantity	%				
2 Bedroom Total	8	12.9%				
3 Bedroom Total	27	43.5%				
4 Bedroom Total	27	43.5%				
Total	62	100.0%				
Parking Summary - State Density Bonus Standard						
Parking Required	Quantity	Ratio Req'd	Spaces Req'd			
2 Bed	8	1.80 Spaces/Unit	12			
3 Bed	27	1.90 Spaces/Unit	41			
4 Bed	27	2.50 Spaces/Unit	68			
Total Residential Parking Req'd		1.95 Spaces/Unit	121			
Parking Provided						
	Quantity	Ratio Provided	Spaces Provided			
Garage Spaces	200	2.00	124			
Driveway Spaces	0	0.00	0			
On Site Spaces	0	0.00	0			
Total Residential Parking Provided	200	2.00	124			
Accessible Parking Required	26	5%	26			
Resident Open Spaces	26	5%	26			
Open Space Summary						
	Quantity	Ratio Req'd	Spaces Req'd			
Private Open Space (Decks)	4,722 sf	76 sf/Unit	Average			
Common Open Space	29,071 sf	469 sf/Unit	Average			
Total Open Space	33,793 sf	545 sf/Unit	Average			



- SITE PLAN KEYNOTES**
- 1 PROPERTY LINE
 - 2 TRASH ENCLOSURE
 - 3 PERPENDICULAR PARKING SPACE (9'X18')
 - 4 ACCESSIBLE PARKING SPACE (9'X18')
 - 5 ACCESSIBLE PATH OF TRAVEL
- NOTE: ALL NON-ADA COMPLIANT SIDEWALK RAMP ABUTTING THE PROJECT SITE WILL BE UPGRADED TO CURRENT CODE.

LEGEND

- PLAN 1
- PLAN 2
- PLAN 3
- PLAN 4
- PROPERTY LINE
- ACCESSIBLE PATH OF TRAVEL
- TYPICAL PERPENDICULAR & ACCESSIBLE PARKING SPACE
- ACCESSIBLE UNIT
- UNIT ENTRY
- Building Number
- Building Type

PERRY STREET
CARSON, CA #2024-0578

SCHEMATIC DESIGN
JANUARY 15, 2025

SITE KEY MAP & INFORMATION

A1.0



Figure 1
Site Plan