

MEMORANDUM

To: Rafael Casillas
City of Paramount Department of Public Works

Date: July 11, 2023

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

LLG Ref: 1-23-4544-1

Subject: 15101 Paramount Boulevard 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 15101 Paramount Boulevard Project (“proposed project”) located in City of Paramount, 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, a detailed review of the applicable VMT screening criteria contained in the Los Angeles County Public Works Transportation Impact Analysis Guidelines¹, and conclusions regarding the proposed project’s VMT impacts.

Description of Proposed Project

The project site is located at 15101 Paramount Boulevard. The project site is generally bounded by Somerset Boulevard to the north, Adams Street to the south, Paramount Boulevard to the east, and Colorado Avenue to the west. The project site is currently occupied by a 22,724 square-foot Ace Hardware Store and Lindsay Lumber. All structures will be removed to accommodate the proposed project. The project site and vicinity are shown in **Figure 1**. An aerial photograph of the existing site is presented in **Figure 2**.

The proposed project consists of the development of a 23,256 square-foot grocery store (Building 1), a 2,760 square-foot Chick-fil-A restaurant with dual drive through service queuing lanes (Building 2), and a 2,400 square-foot coffee shop with drive-through service lane (Building 3). The proposed project is planned to provide a total of 153 vehicular parking spaces. Vehicular access to the project site will be accommodated via two driveways on Colorado Avenue, two right-turn only driveways on Paramount Boulevard, and the existing alleyway on Adams Street. The project build-out and occupancy year is anticipated by the year 2025. The proposed site plan is illustrated in **Figure 3**.

¹ Los Angeles County Public Works, “Transportation Impact Analysis Guidelines,” July 23, 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* (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.

It is understood that the City of Paramount has not formally adopted VMT methodology, screening criteria, or thresholds for VMT analysis of land use development projects within its jurisdiction. It is further understood that the City intends to generally follow the methodology set forth in the Los Angeles County Public Works Transportation Impact Guidelines (dated July 23, 2020).

Consistent with the recommendations provided by OPR in the *Technical Advisory*, the County's Guidelines recognize the following four (4) types of screening criteria which may be applied to screen proposed projects out of detailed VMT analysis:

- Non-Retail Project Trip Generation Screening Criteria
- Retail Project Site Plan Screening Criteria
- Proximity to Transit Screening Criteria
- Residential Land Use Screening Criteria

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 County's screening criteria may be applied to the proposed project. Specifically, the "Retail Project Site Plan" screening criterion is applicable to the proposed project. The following section provides a detailed review of the application of the screening criteria to the proposed project.

Non-Retail Project Trip Generation Screening Criteria

Section 3.1.2.1 of the County's Guidelines state that: "If the answer is no to the question below, further analysis is not required, and a less than significant determination can be made.

- Does the development project generate a net increase of 110 or more daily vehicle trips?"

The *Technical Advisory* provides the following evidence for this presumption: "CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact."

As the proposed project is a retail development, this criterion does not apply and therefore does not satisfy the non-retail project trip generation screening criteria.

Retail Project Site Plan Screening Criteria

New local serving retail development typically redistributes shopping trips rather than creating new ones. By adding retail opportunities into the urban fabric and improving retail destination proximity, local serving retail developments tend to shorten trips and reduce VMT, and may be presumed to cause less than significant impacts. Consistent with OPR's guidance, the County assumes that retail projects of any type which are less than 50,000 square feet may be considered local serving retail.

Therefore, Section 3.1.2.2 of the County Guidelines states: "A project that contains a local serving retail use is assumed to have less than significant VMT impacts for the retail portion of the project. If the answer to the following question is no, a less than significant determination can be made for the portion of the project that contains retail uses.

- Does the project contain retail uses that exceed 50,000 square feet of gross floor area?"

The proposed project consists of the development of a total of 28,416 square-feet of building area (i.e., 23,256 SF supermarket + 2,760 SF fast-food restaurant with drive-through + 2,400 SF coffee shop with drive-through = 28,416 SF). The proposed land use type is identified by County Guidelines as a retail land use, and the size of the overall project is well below 50,000 square feet. Therefore, according to the County's Guidelines, as the proposed project is local serving in nature and is less than 50,000

square feet, the answer to the screening question is “No” and the proposed project satisfies the criteria to be considered a local serving use. Therefore, the project meets the condition to presume less than significant transportation impacts stated in CEQA Guidelines Section 15064.3 and therefore screens out of further 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 stop² or a stop along an existing high-quality transit corridor³ 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?
- Does the project provide more parking than required by the County 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?

As the proposed project site is not located within a one-half mile distance of either an existing major transit stop or a stop along an existing high-quality transit corridor, the project does not meet the proximity to transit screening criteria.

Residential Land Use Screening Criteria

In the *Technical Advisory*, OPR refers to research indicating that low-income housing in infill locations generally improves the jobs-housing match, shortening commutes and reducing VMT. OPR asserts that evidence supports presuming less than significant transportation impacts for 100% affordable residential developments, and that a project consisting of a high percentage of affordable housing may be a basis for a lead agency to find a less than significant impact on VMT, thereby screening out of detailed VMT analysis.

² 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.”

³ ““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.”

Consistent with the recommendations provided by OPR, Section 3.1.2.4 of the County's Guidelines indicate that certain projects which further the State's affordable housing goals are presumed to have less than significant impacts on VMT. The Guidelines state: "If the project requires discretionary action and the answer is yes to the question below, further analysis is not required, and a less than significant determination can be made.

- Are 100% of the units, excluding manager's units, set aside for lower income households?"

As the proposed project is a retail development and will not include residential units, this criterion does not apply and therefore does not satisfy the residential land use screening criteria.

Summary and Conclusions

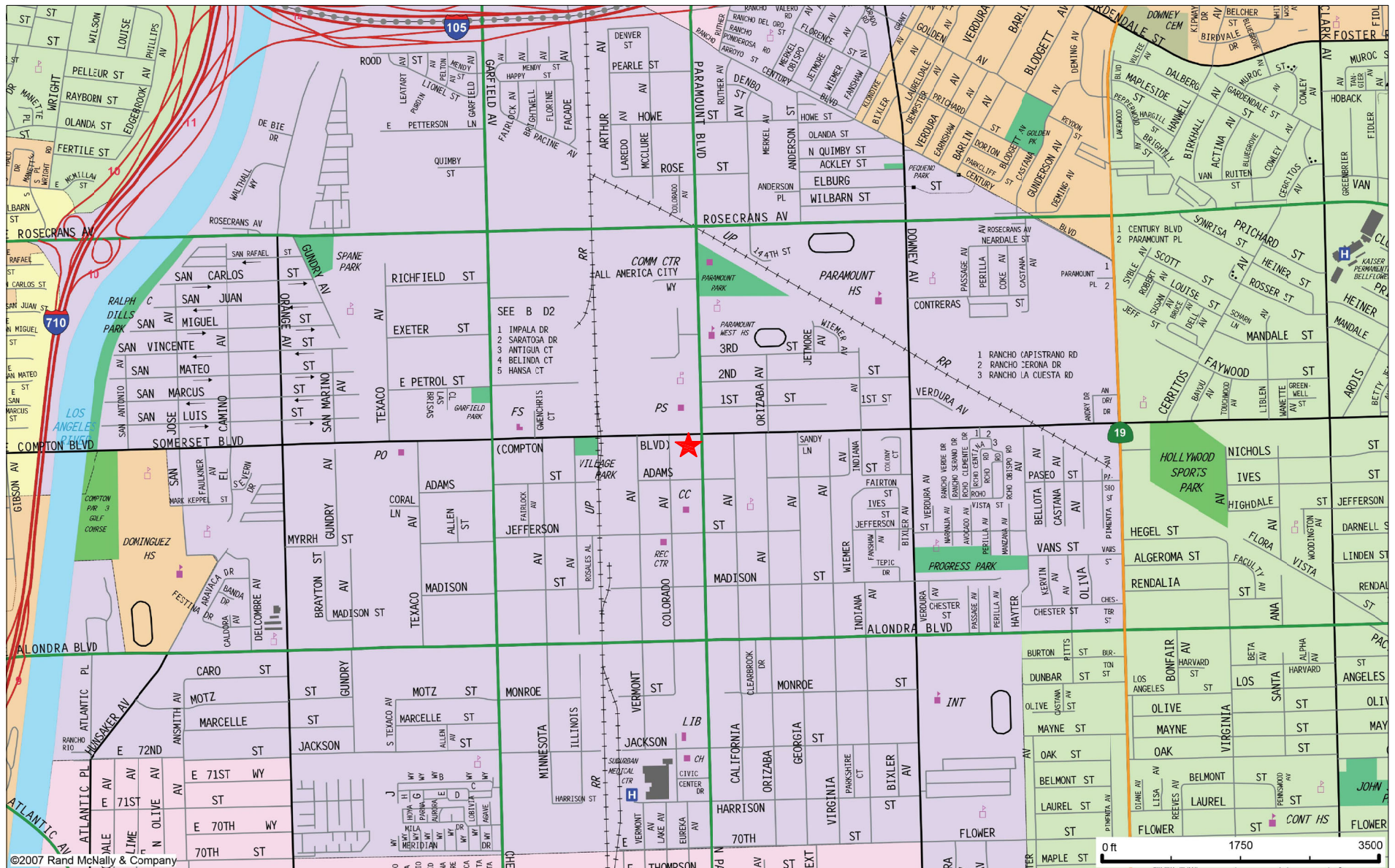
Based on a detailed review of the VMT screening criteria set forth in the Los Angeles County Transportation Impact Guidelines, it is determined that the proposed project satisfies the retail project site plan criteria.

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 of the screening criteria (i.e., the Retail Project Site Plan Screening Criteria), the proposed project meets the condition to presume less than significant transportation impacts stated in CEQA Guidelines Section 15064.3 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 assessment prepared for the proposed project.

Attachments

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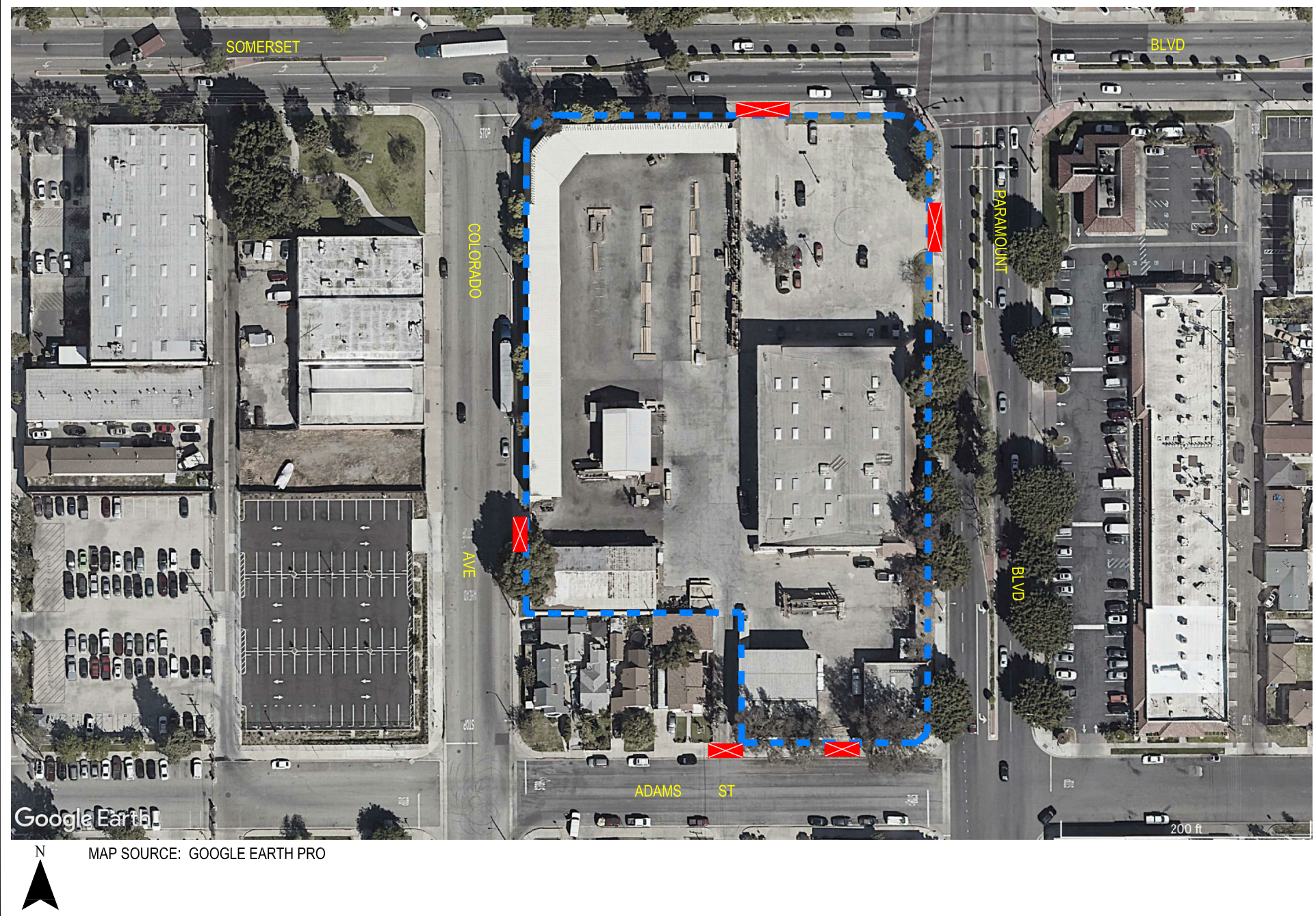
MAP SOURCE: RAND MCNALLY & COMPANY



Project Site

Figure 1
Vicinity Map

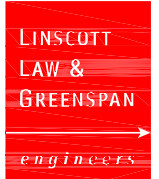
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Google Earth



MAP SOURCE: GOOGLE EARTH PRO





-  Project Site
-  Existing Driveway

Figure 2
Aerial Photograph of Existing Project Site

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