VMT Analysis

for:

650 PCH PROJECT

In the City of El Segundo

January 2021

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VMT ANALYSIS
FOR THE PROPOSED
650 PCH PROJECT
IN THE CITY OF EL SEGUNDO, CALIFORNIA

Prepared for:

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INTRODUCTION

Senate Bill (SB) 743 was approved by the California legislature in September 2013. SB 743 requires changes to California Environmental Quality Act (CEQA), specifically directing the Governor's Office of Planning and Research (OPR) to develop alternative metrics to the use of vehicular "level of service" (LOS) for evaluating transportation projects. OPR has updated guidelines for CEQA, written a technical advisory for evaluating transportation impacts in CEQA and has set a deadline of July 1, 2020 for local agencies to update their CEQA transportation procedures. OPR has recommended that Vehicle Miles Travelled (VMT) replace LOS as the primary measure of transportation impacts. The City of El Segundo is in the process of adopting new Transportation Impact Guidelines and now relies on VMT as the measure for determining a project significant transportation impact under the CEQA process.

This technical memorandum was prepared to document the VMT analysis for the 650 PCH project following the OPR Technical Advisory on Evaluating Transportation Impacts (Governor's Office of Planning and Research, 2018) and the draft City of El Segundo SB 743 Implementation Guidelines.

PROJECT OVERVIEW

The project is located in the north-central portion of the City of El Segundo, in the County of Los Angeles. The Project Site is located at 650 and 700 North Pacific Coast Highway (Buildings A and B, respectively) and 737 Carl Jacobson Way (Building D). In total, the project site consists of seven contiguous parcels. The applicant proposes to renovate and perform minor alterations to buildings A and B and demolish the existing surface parking lot to construct a 122,156 square-foot office building (Building C) with a 1,185-space parking structure. In addition, the Project will consolidate the seven parcels of land into a single 7.258-acre ground parcel through the proposed Vesting Tentative Parcel Map No. 83129. The gross square footages for each building in the Project are as follows:

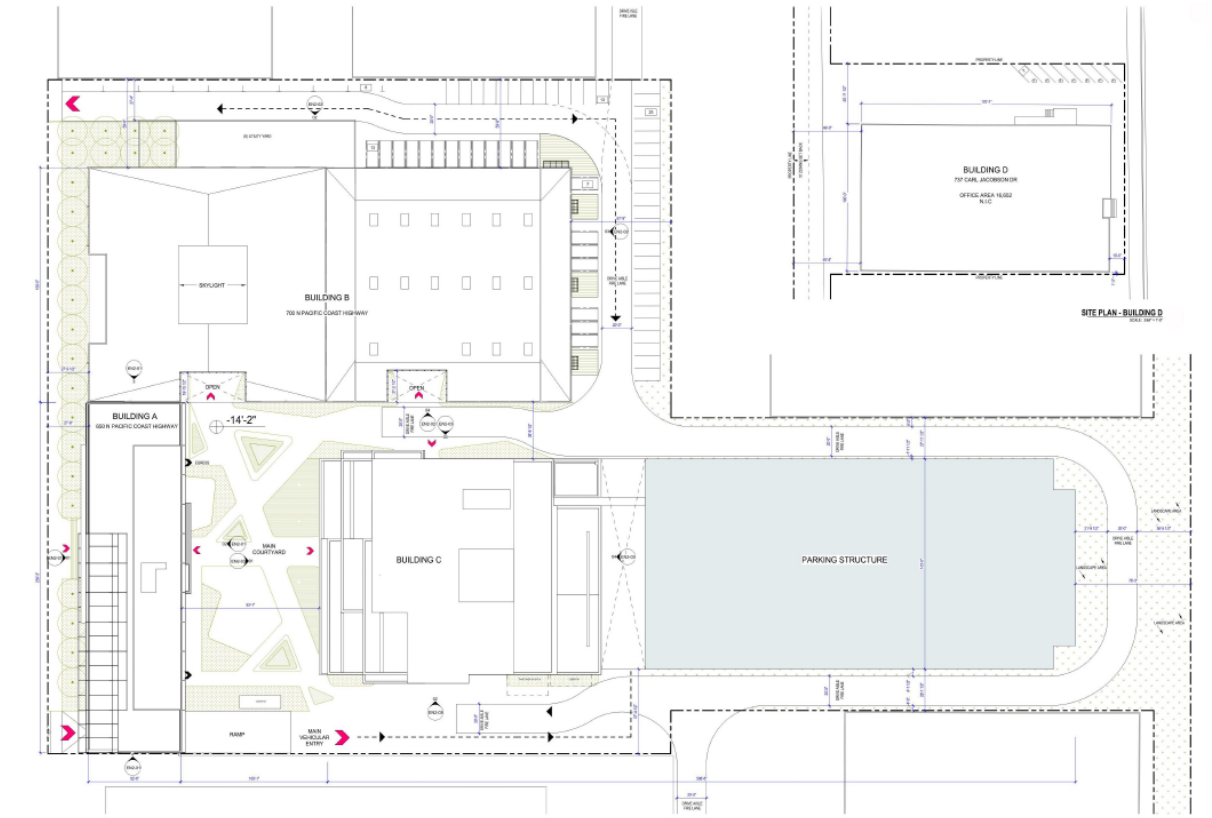
- Building A: 99,916 square-feet of floor area (net addition of 1,031 square feet from existing 98,885 square-feet)
- Building B: 65,120 square-feet of floor area (net reduction of 4,572 square feet from existing 69,692 square-feet)
- Building C: 122,156 gross square feet, with an integrated 1,185-space parking structure
- Building D: 16,652 square-feet of floor area (no proposed changes)

Figure 1 shows the project location and Figure 2 shows a Conceptual Site Layout.

Figure 1 – Project Location

Source: Michael Baker International

Figure 2 – Conceptual Site Layout



Vehicular access provisions for the project site would be provided via two existing driveways on Pacific Coast Highway. One driveway is located on the north side of Building B and the other is on the south side of Building A. Both driveways are unsignalized and provide right-in-right-out only access due to a median on Pacific Coast Highway. An additional driveway is located on Mariposa Avenue which is reserved for emergency vehicle access only that will wrap around the exterior of the proposed parking structure and exit through a gate continuing onto the property at 1910 East Maple Avenue north of the project site.

The proposed parking structure would provide a total of 1,185 parking spaces to serve the office uses at the Project Site and potentially other nearby parcels that do not have adequate parking. In total, the Project Site would provide 1,256 spaces when including the 71 existing and proposed surface parking spaces on the north and east side of Building B. The Project would also include 128 short-term and long-term bicycle parking spaces. Loading space would be provided via three loading docks, located on the south side of Building C.

PROJECT AREA

The area surrounding the project is mostly corporate offices with some general commercial uses. The project site is bounded by Sepulveda Boulevard, a major arterial and truck route, Mariposa Avenue and Lairport Street, which are secondary arterials, and Maple Avenue, a collector street. Mariposa Avenue is also a designated El Segundo bike route.

The project site is well served by public transit provided by Los Angeles County Metropolitan Transportation Authority (Metro). Bus stops located at PCH and Mariposa Avenue serve the project with Metro Line 232. Metro Line 232 operates along PCH and Mariposa Avenue within the project vicinity. On weekdays Line 232 operates from 4:30 AM to 11:47 PM, with approximate 30-minute headways throughout the day. On Saturdays, Sundays and holidays, Line 232 operates from approximately 4:38 AM to 1:01 AM, with 30-minute headways throughout the day. The Mariposa Metro Station, served by the Metro C Line, at the intersection of E Mariposa Avenue and N Noah Street is also located within half mile distance of the Project site.

VEHICLE MILES TRAVELED THRESHOLDS FOR EL SEGUNDO

The OPR Technical Advisory (Governor's Office of Planning and Research, 2018) recommends Vehicle Miles Traveled (VMT) thresholds set to 15% below the regional average. The City of El Segundo is part of Los Angeles County and is a member city of the Southern California Association of Governments (SCAG), which maintains the regional travel demand model as part of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, the SCAG area is considered the region to which the regional average is derived from.

The draft City of El Segundo SB 743 Implementation Guidelines was created to apply both SB 743 and the OPR Technical Advisory (Governor's Office of Planning and Research, 2018) to the City specifically and define the City's guidelines to identify transportation impacts under CEQA.

The VMT threshold criteria for Office uses, per the draft City of El Segundo SB 743 Implementation Guidelines , is summarized in Table 1.

Table 1 - VMT Threshold Criteria for Office

Land Use	Threshold of Significance
Office	15% below existing SCAG Home-based Work (HBW) VMT per employee

Based on this criteria shown in Table 1, the VMT threshold of significance for office land use in the City of El Segundo has been established and summarized in Table 2. The numerical threshold value shown in Table 2 is based on the draft City of El Segundo SB 743 Implementation Guidelines.

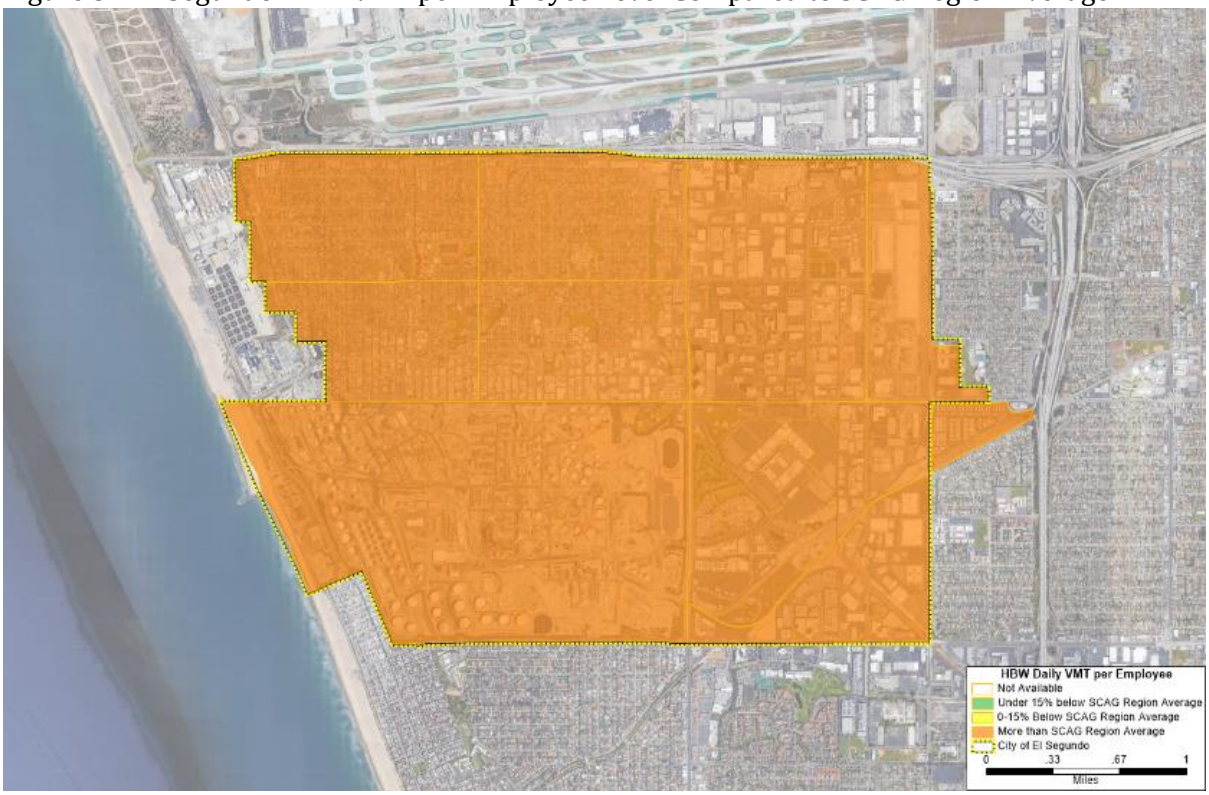
Table 2 - VMT Thresholds of Significance

Land Use	VMT Threshold	Basis
Office	17.0 Work VMT/Employee[1]	15% below existing SCAG HBW VMT per employee

Improvements to methods and data as well as other modeling modifications may result in periodic updates to the numerical threshold that is seen both here and in the draft City of El Segundo SB 743 Implementation Guidelines. However, the criteria of 15% below existing SCAG HBW VMT per Employee levels remains the same. More information on the methodology of how this numerical threshold was calculated can be found in the draft City of El Segundo SB 743 Implementation Guidelines.

Figure 3 shows that the HBW VMT per employee levels in the City are higher compared to the SCAG Region Average.

Figure 3 – El Segundo HBW VMT per Employee Level Compared to SCAG Region Average



VEHICLE MILES TRAVELED SCREENING

This section documents VMT/ SB 743 considerations for the project. The OPR Guidelines provide details on appropriate screening thresholds that can be used to identify when a proposed land

[1] Work VMT specifically applies to commute trips as represented in the Travel Demand Model.

use project is anticipated to result in a less than significant impact without conducting a more detailed level analysis. Screening thresholds are broken into the following three steps:

1. Transit Priority Area (TPA) Screening
2. Low VMT Area Screening
3. Small Project Screening

A land use project needs only meet one of the above screening thresholds to be presumed to result in not significant impact under CEQA pursuant to SB 743.

Transit Priority Area (TPA) Screening

As described in the OPR Guidelines, projects located within half mile from an existing major transit stop or within half of a mile from an existing stop along a high-quality transit corridor can be screened out. A major transit stop is described as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or 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. A high-quality transit corridor is described as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

The OPR Guidelines state that this presumption may NOT be appropriate if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City), with input from the Metropolitan Planning Organization);
- Replaces affordable residential units with a smaller number of moderate-or high-income residential units.

The project site is well served by public transit provided by Los Angeles County Metropolitan Transportation Authority (Metro). It is located within a half mile distance to Mariposa Metro Station, served by the Metro C Line, located at the intersection of E Mariposa Avenue and N Noah Street. The C Line has seven to eight minutes headways during peak hours on the weekdays, 15-minute headways during the midday and all day on the weekends, and 20-minute headways at night. Metro Line 232 operates along PCH and Mariposa Avenue within the project vicinity. On weekdays Line 232 operates from 4:30 AM to 11:47 PM, with approximate 30-minute headways throughout the day. On Saturdays, Sundays and holidays, Line 232 operates from approximately 4:38 AM to 1:01 AM, with 30-minute headways throughout the day.

OPR also has a beta tool named Site Check that allows users to see the potential accelerated pathways to CEQA compliance that may apply based on the location of the parcels. One of the

screening criteria that it checks for is whether the project is in a TPA. As seen in Appendix A, OPR's Site Check does state that the project meets the TPA criteria.

Based on the OPR Guidelines, the Project may be presumed to have a less than significant impact absent substantial evidence to the contrary. The Project does not meet any of the criteria that would disqualify it from TPA screening with the exception of parking supply. As previously described the proposed Project would provide a total of 1,256 parking spaces to serve the office uses at the Project Site and potentially other nearby parcels that do not have adequate parking. Although the Project provides in excess of 663 parking spaces required per El Segundo Municipal code, Ord. 1444, 8-3-2010, not all the parking spaces are intended to be used by the employees and visitors of the Project. The additional parking spaces are intended to accommodate nearby parcels that are potential underserved. As such, the parking provided may not necessarily disqualify the project from screening out from TPA screening. However, in abundance of caution and to provide a conservative analysis, a full VMT analysis has been conducted.

Low VMT Area Screening

Per the OPR Technical Advisory, "residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Maps created with VMT data, for example from a travel survey or a travel demand model, can illustrate areas that are currently below threshold VMT. Because new development in such locations would likely result in a similar level of VMT, such maps can be used to screen out residential and office projects from needing to prepare a detailed VMT analysis."

As seen in Figure 3 earlier, the HBW VMT/Employee level TAZ in which the project is located is higher than the SCAG Region average.

Small Project Screening

Per the OPR Technical Advisory, "absent substantial evidence indicating a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact."

Trip Generation estimates for the existing use and the proposed project are based on the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition) trip rates for General Office Building (ITE Land Use 710). In addition to the existing use, the project is expected to generate 1,155 daily trips, well above the 110 daily trips screening criteria.

VMT ANALYSIS

Methodology

The calculation of vehicle miles traveled has two components – the total number of trips generated and the average trip length of each vehicle. A Travel Demand Model is a useful tool to

estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households and employment. Travel Demand Models (TDMs) are broadly considered to be amongst the most accurate of available tools to assess regional and sub-area VMT. Southern California Association of Governments (SCAG) maintains the regional travel demand model as part of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which consists of six counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, Imperial) in the southern California region. The latest available SCAG travel demand model developed as part of the 2016 RTP/SCS was determined to be the best fit for developing the VMT thresholds considering the geographic location of the City and the detailed roadway and transit networks in the model.

The 2016 Base Year model scenario was used for the baseline conditions and 2040 Plan model scenario was used for the cumulative conditions in the City. Out of the six counties included in the model Los Angeles county is the major contributor of the trips to and from the City during a typical weekday. Trips outside of the SCAG region were estimated from the external stations surrounding the model region and were determined to be excluded from the VMT analysis as those were less than 1% of the Citywide trip generation.

Before beginning the Citywide VMT analysis the zonal structure and various components of the SCAG model were thoroughly reviewed to make the best use of model results to determine the VMT thresholds.

Model Zone Structure

VMTs were computed at Traffic Analysis Zone (TAZ) level to determine the thresholds as well as compare City's performance against the County and entire SCAG region. SCAG model uses two-tiered zone structure the allows for micro and macro-scale analysis and reporting. The first tier contains 4,109 internal zones, while the second tier contains 11,267 internal zones. All Tier 2 zones nest within Tier 1 zones. The model generates outputs for different components that vary by the two tiers. The results that are used to compute VMT are mainly focused at Tier 1 level, therefore the VMT analysis was conducted at the Tier 1 TAZ level.

Socio-Economic Data

Socioeconomic data (SED) and other model inputs are contained in each TAZ. Out of several different variables in the model SED, the VMT analysis mainly focused on population, number of households and types of employment that are used in the trip generation component. VMT computation was focused on the fact that the model uses employment variables by 3 income levels to determine commute trips and employment variables by 13 industries to determine rest of the trips. Employment variables used in the model are listed below.

Employment by Income Level:

1. Low Income Employment (less than $34,999)
2. Medium Income Employment ($35,000 to $74,999)
3. High Income Employment ($75,000 or more)

Employment by Industry type:

1. Agriculture and mining
2. Construction
3. Manufacturing
4. Wholesale trade
5. Retail trade
6. Transportation, warehousing, and utility
7. Information
8. Financial activities
9. Professional and business services
10. Education and health services
11. Leisure and hospitality services
12. Other services
13. Public administration

It should be noted that not all of the employment variables by industry type in the model are used for trip generation, therefore commute VMT was calculated for few land use types were applicable using the trip generation rates that were used in the model.

Trip Generation

The model runs a series of complex steps to estimate daily trip productions and attractions by various trip purposes and market sectors for each TAZ. The trip purposes are listed below.

Model Trip Purpose:

1. Home-Based Work Direct (HBWD)
2. Home-Base Work Strategic (HBWS)
3. Home-Based School (HBSC)
4. Home-Based College and University (HBCU)
5. Home-Based Shopping (HBSH)
6. Home-Based Social-Recreational (HBSR)
7. Home-Based Serving-Passenger (HBSP)
8. Home-Based Other (HBO)
9. Work-Based Other (WBO)
10. Other-Based Other (OBO)

The production model uses several variables such as number of workers, household income, age, household size and car availability depending on the trip purpose. Trip productions for every TAZ in the model were compiled separately by each trip purpose. The attraction model uses income categories of employment for the HBW trip purpose, whereas it uses 13 categories of employment for all non-HBW trip purposes. The attraction model estimates trip attractions to each TAZ by regression coefficients that varies by employment type. Trip attractions for every TAZ were compiled by each purpose and by each employment type based on these regression coefficients.

Person Trips, Vehicle Occupancy, Trip Distance

Trip productions and attractions were compiled after the mode choice step, and only auto trips were used for the analysis. Since these auto trips are person trips, vehicle occupancy factors were applied for carpool 2 and carpool 3+ auto person trips. Model uses separate factors for carpool 3+ for each trip purpose. After the vehicle trip productions and attractions were computed for each trip purpose, trip lengths were applied for each zone pair from the skim matrices in the model to compute the production and attraction VMT by purpose.

VMT by Land Use Type

The residential VMT was computed by combining the production VMT for all the Home-Based trip purposes. VMT for non-residential land uses was computed from the attraction VMT for only the Home-Based-Work trip purpose.

VMT Calculations

The residential VMT was computed by combining the production VMT for all the Home-Based trip purposes. Commute VMT was computed from the attraction VMT by Home-Based Work trip purposes. Residential and commute VMT by each TAZ were computed and average VMT were determined by City County, and Region levels to determine the thresholds.

PROJECT VMT

The major trip purposes of the site in terms of their trip length and frequency should be considered to evaluate this type of facility. Given the description, two types of trips were broadly considered for this development given its context: (1) employee commute trips; (2) other trips related to functioning of the business and/or its employee. The following discussion is provided regarding these two broad trip types.

Employee commute trips. These are the primary automobile trips associated with employment generating uses such as the proposed project. This facility is expected to provide additional jobs and some related trips to the area. The efficiency of VMT associated with employee commute trips has been assessed based on the City's draft guidelines consistent with the SCAG Travel Demand Model.

Other trips. These are often the smallest number and shortest distance of trips for a facility like this and include a broad range of trip types, such as, employee lunches off-site, maintenance teams for on-site infrastructure, office supply deliveries, etc. As such their impact to the overall VMT of the site is likely minimal. As such it is not likely that they are impactful to the local transportation system and are secondary to the commute trips.

The same model used for developing the thresholds was used to calculate the Project VMT consistent with the OPR guidelines. Adjustments in socio-economic data (employment) were

made to the appropriate traffic analysis zone (TAZ) within the SCAG model to reflect the project's proposed land use. The step-by-step guide to these adjustments can be seen in Appendix B.

Project Home-Based Work (HBW) VMT per Employee

The home-based work (HBW) VMT per employee is the HBW attraction VMT divided by the number of employees derived from the SCAG model and is based on those employee commute trips discussed earlier. The HBW VMT per Employee is used to measure efficiency of VMT generated by employment-based uses.

The project is located in TAZ #21138000. Based on the SCAG 2016 RTP/SCS travel demand model, TAZ #21138000 has 12,137 employees that produce 262,958 HBW VMT. Therefore, the Existing HBW VMT per Employee calculated is 21.7. As seen in Table 3, the project adds an additional 473 employees that produce an additional 12,375 HBW VMT.

Table 3 – Project HBW VMT/Emp

TAZ #21138000	Total Employees	HBW VMT	HBW VMT / Emp
Existing	12,137	262,958	21.7
Project	473	12,375	-
Existing Plus Project	12,610	275,333	21.8

Therefore, the Project HBW VMT per Employee calculated based on the SCAG model is 21.8.

Potential Project Impacts

As shown in Table 4, the project's HBW VMT per Employee would not meet the 15% below regional average threshold. As such, the project's transportation impact is potentially significant based on the OPR recommended thresholds.

Table 4 – VMT Impact Evaluation

Threshold Option	Threshold	Project	Change in VMT	Potentially Significant?
HBW VMT Employee	17.0	21.8	+4.8	Yes

Mitigation

If a significant transportation impact is identified, feasible mitigation measures to avoid or reduce the impact must be identified. CEQA requires that the mitigation measures are included in the project's environmental analysis. OPR provides a list of potential measures to reduce VMT but gives the lead agency full discretion in the selection of mitigation measures.

For an individual development project, VMT mitigations will typically require the preparation of a transportation demand management (TDM) program. A TDM program is a combination of strategies to reduce VMT. The program is created by an applicant for their land use project based

on a list of strategies agreed to with the City of El Segundo. The City of El Segundo is developing a list of potential TDM strategies appropriate for their jurisdiction guided by the California Air Pollution Control Officers Association (CAPCOA) recommendations found in the 2010 publication Quantifying Greenhouse Gas Mitigation Measures (California Air Pollution Control Officers Association (CAPCOA), 2010).

In terms of commute trip reduction, the 4.8 miles per employee is equivalent to 254 daily trips (22% of 1,155 daily trips estimated for the project). The applicant shall prepare and implement a Project-specific TDM program that will reduce the Project's VMT per employee by a minimum of 4.8 miles or 254 daily trips based on a preliminary list of applicable strategies described previously that provide feasible means to adequately reduce the Project VMT. These elements may change or be adjusted to adapt to changing commute trends and to maximize the efficiency and performance of the program.

Transportation demand management (TDM) strategies have been evaluated for reducing VMT impacts determined to be potentially significant and a list of potential strategies with the City's max VMT reduction and equivalent daily trip reduction that could be implemented by the Project are listed below:

1. **Safe and Well-Lit Access to Transit**: Enhance the route for people walking or bicycling to nearby transit stops located on PCH and Mariposa Avenue. **(2%) or up to 23 trips.**
2. **Transit Subsidies**: Provide subsidization of transit fare for employees of the project site. This strategy helps reduce single-occupancy vehicle trips by utilizing transit service already present in the project area. **(10%) or up to 116 trips.**
3. **Travel Behavior Change Program**: Provide a web site that allows employees to research other modes of transportation for commuting. **(4%) or up to 46 trips.**
4. **Promotions & Marketing**: Provide marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices with passive educational and promotional materials. **(4%) or up to 46 trips.**
5. **Commute Assistance Center**: Provide a computer kiosk that allows employees to research other modes of transportation for commuting. **(4%) or up to 46 trips.**
6. **Preferential Carpool / Vanpool Parking Spaces**: Provide reserved carpool/vanpool spaces closer to the building entrance. **(10%) or up to 116 trips.**
7. **Passenger Loading Zones**: Provide passenger loading zones for easy access to carpools or vanpools. **(5%) or up to 58 trips.**
8. **Bike Share**: Implement bike share to allow people to have on-demand access to a bicycle, as-needed. **(0.25%) or up to 3 trips.**
9. **Bike Parking and Facilities**: Include secure bike parking and showers to provide additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel. Provide on-site bicycle repair tools and space to use them supports on-going use of bicycles for transportation. **(3%) or up to 35 trips.**

10. **Traffic Calming Improvements:** Implement traffic calming measures throughout and around the perimeter of the project site that encourage people to walk, bike, or take transit within the development and to the development from other locations. **(1%) or up to 12 trips.**
11. **Pedestrian Network Improvements**: Implement pedestrian network improvements throughout and around the project site that encourages people to walk. **(2%) or up to 23 trips.**
12. **Parking Cash Out**: Provide employees a choice of forgoing current parking for a cash payment to be determined by the employer. **(5%) or up to 58 trips.**
13. **Alternative Work Schedule**: Implement Flextime, Compressed Work Week (CWW), and staggered shifts for employees. **(15%) or up to 173 trips.**
14. **Telecommuting**: Provide telework option to employees by use of telecommunications as a substitute for physical travel. **(22%) or up to 254 trips.**

Additional City of El Segundo TDM measures are provided in Appendix C.

It is recommended that the TDM program be implemented for the entire campus (i.e., Buildings A, B and C) to reduce the overall VMT in the region and thus reducing the Project's potential VMT impact below the threshold. The total trip generation estimate for the campus is 2,797 daily trips. A reduction of 254 daily trips or 9.1% should be achieved for the entire project using a combination of the TDM strategies discussed above to bring the project's potential VMT impact to less than significant levels.

TDM Plan

It is recommended that the Project applicant prepare a TDM Plan in consultation with the City to develop a TDM program to include a combination of the strategies listed above or other strategies as appropriate. The TDM program will be comprised of three major components:

1. Education: The Education component focuses on awareness and communication to reduce vehicle trips to the building by employees.
2. Program Elements: The TDM program shall implement elements that will promote carpool, bicycling, walking, and transit in place of individual vehicle trips to and from the Project. These elements may change or be adjusted to adapt to changing commute trends and to maximize the efficiency and performance of the program.
3. Monitoring: To ensure that the TDM program is working effectively and achieving its goals, regular monitoring of commute patterns and reviewing the TDM program will be necessary.

CONCLUSION

The project's transportation impact based on VMT is potentially significant based on the OPR's recommended thresholds. With the implementation of a TDM program, the Project transportation impact is anticipated to be less-than-significant.

REFERENCES

California Air Pollution Control Officers Association (CAPCOA). (2010). *Quantifying Greenhouse Gas Mitigation Measures.*

Governor's Office of Planning and Research. (2018). *Technical Advisory: On Evaluating Transportation Impacts in CEQA.*

APPENDIX A – SITE CHECK REPORT

Site Check Report

created **January 25, 2021**

Legal Disclaimer: The following report is provided as a public service, for informational purposes only. This report should not be construed as legal advice. Users of this report should independently verify its determinations prior to taking any action under the California Environmental Quality Act (CEQA).

Legend

A check mark means the tool determined the parcel met the spatial requirements for a CEQA provision.

A question mark indicates (1) the spatial requirements may have been met but must be further verified by the user or (2) that there are no spatial requirements for that provision.

An means the tool determined that the site did not meet the CEQA spatial requirements.

Project 3

4 parcels

5

Categorical Exemptions

Categorical exemptions are made up of classes of projects that generally are considered not to have potential impacts on the environment. Categorical exemptions are identified by the Natural Resources Agency and are defined in the CEQA Guidelines (§§ 15300-15333). All categorical exemptions are subject to the limitations contained in CEQA Guidelines § 15300.2. Only the two categorical exemptions regularly used for housing are mapped and reported; other categorical exemptions could potentially be utilized and should be reviewed and considered.

CEQA Guidelines § 15332 (Class 32, Infill Development Projects)

This categorical exemption covers all infill projects, including projects that contain residential uses.

Site Check considered the following requirements:

City Limits

Within city limits

User must determine the remaining requirements:

◯ Type of Housing

Any

◯ Plan Consistency

The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

◯ Acreage

The project site is no more than five acres.

◯ Infill

The project site is substantially surrounded by urban uses.

◯ Habitat

The project site has no value as habitat for endangered, rare or threatened species.

◯ Significant Impacts

Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

◯ Utilities

The site can be adequately served by all required utilities and public services.

◯ Exceptions

None of the exceptions contained in CEQA Guidelines § 15300.2 apply:

◯ Cumulative Impact

All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

◯ Significant Effect

A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

◯ Scenic Highways

A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State Scenic Highway. This

does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

◯ Hazardous Waste Sites

A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to GOV § 65962.5.

◯ Historical Resources

A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

Streamlining

Streamlining provisions under CEQA range from a complete exemption to an obligation to prepare a narrowed environmental document with fewer topics.

✓ PRC § 21094.5 (SB 226, Infill Streamlining)

This provision provides a streamlined review process for infill projects that satisfy specified performance standards by limiting the topics subject to review at the project level where the effects of infill development have been addressed in a planning level decision or by uniformly applicable development policies. Streamlining under this section will range from a complete exemption to an obligation to prepare a narrowed, project-specific environmental document (see CEQA Guidelines § 15183.3(c), (d)). A notice of determination must be filed if this code section is used to obtain a full exemption from CEQA (see CEQA Guidelines § 15183.3(d)(2)(A)). For more information on this provision, see CEQA Guidelines Appendix M (performance standards prepared pursuant to PRC § 21094.5.5) and Appendix N (infill environmental checklist form).

Site Check considered the following requirements:

✓ Urban Area

Within an Urban Area

"Urban area" includes either an incorporated city or an unincorporated area that is completely surrounded by one or more incorporated cities that meets both of the following criteria:

A. The population of the unincorporated area and the population of the surrounding incorporated cities equal a population of 100,000 or more.
B. The population density of the unincorporated area is equal to, or greater than, the population density of the surrounding cities.

✓ Transit Proximity

Any of the following:

Note, even if a project does not meet any of the transit proximity requirements listed below, it may still qualify for this streamlining provision if it is a residential or mixed-use project

consisting of 300 or fewer residential units, all of which are affordable to low income households. (See CEQA Guidelines, Appendix M, Section IV.A.)

Existing Major Transit Stop

Within ½ mile of an existing Major Transit Stop.

"Major Transit Stop" means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with frequencies of service intervals of 15 minutes or less during the morning and afternoon peak commute periods.

Planned Major Transit Stop

Within ½ mile of a planned Major Transit Stop.

A planned and funded stop that is included in an adopted regional transportation improvement program.

Existing High-Quality Transit Corridor

Within ½ mile of a stop along an existing High-Quality Transit Corridor.

"High-quality transit corridor" means an existing corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Planned High-Quality Transit Corridor

Within ½ mile of a stop along a planned High-Quality Transit Corridor.

A planned and funded stop that is included in an adopted regional transportation improvement program.

Low Vehicle Travel Area

Within a Low Vehicle Travel Area.

"Low vehicle travel area" means a traffic analysis zone that exhibits a below average existing level of travel as determined using a regional travel demand model. For residential projects, travel refers to either home-based or household vehicle miles traveled per capita. For commercial and retail projects, travel refers to non-work attraction trip length; however, where such data are not available, commercial projects reference either home-based or household vehicle miles traveled per capita.

User must determine the remaining requirements:

Type of Housing

Residential or Mixed-Use (undefined)

Infill

Site either has been previously developed or a vacant site that adjoins existing qualified urban uses on at least seventy-five percent of the site's perimeter.

"Adjoins" includes uses that are separated only by an improved public right-of-way.

SCS Consistency

Since this is within the boundaries of an MPO, the project must be consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the applicable Sustainable Communities Strategy.

Soil and Water Remediation

If the project site is included on any list compiled pursuant to GOV § 65962.5, the project shall document how it has remediated the site, if remediation is completed. Alternatively, the project shall implement the recommendations provided in a preliminary endangerment assessment or comparable document that identifies remediation appropriate for the site.

Residential Units Near High-Volume Roadways and Stationary Sources

If a project includes residential units located within 500 feet, or other distance determined to be appropriate by the local agency or air district based on local conditions, of a high volume roadway or other significant sources of air pollution, the project shall comply with any policies and standards identified in the local general plan, specific plan, zoning code or community risk reduction plan for the protection of public health from such sources of air pollution. If the local government has not adopted such plans or policies, the project shall include measures, such as enhanced air filtration and project design, that the lead agency finds, based on substantial evidence, will promote the protection of public health from sources of air pollution. Those measure may include, among others, the recommendations of the California Air Resources Board, air districts, and the California Air Pollution Control Officers Association.

PRC § 21099 (SB 743, Aesthetics & Parking)

This provision removes the requirement to analyze aesthetic and parking impacts. It does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies. For the purposes of this streamlining provision, aesthetic impacts do not include impacts on historical or cultural resources.

Site Check considered the following requirements:

Transit Proximity

The project is proposed within a transit priority area, as defined in subdivision (a) of PRC § 21099:

"Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning

horizon included in a Transportation Improvement Program or applicable regional transportation plan.

User must determine the remaining requirements:

◯ Type of Housing

Residential or mixed-use residential (not defined)

◯ Infill

Must be located on an infill site as defined in PRC § 21099:

"Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

✓ PRC § 21155.2 (SB 375, SCEA)

This provision applies to transit priority projects, which are defined in PRC § 21155. If this criterion is met, then the project might qualify for a Sustainable Communities Environmental Assessment (SCEA), which is essentially a negative declaration that is subject to a substantial evidence standard of review (see PRC § 21155.2(b)). If the project does not qualify for an SCEA, it may qualify for a streamlined environmental impact report (see PRC § 21155.2(c)).

Site Check considered the following requirements:

✓ Transit Proximity

Any of the following:

Note, a project is considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor. (See PRC § 21155.)

✓ Existing Major Transit Stop

Within ½ mile of an existing Major Transit Stop as defined in PRC § 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.

d. "Bus rapid transit" is defined in PRC § 21060.2.

Planned Major Transit Stop

Within ½ mile of a planned Major Transit Stop as defined in PRC § 21064.3 that is included in the applicable Regional Transportation Plan.

Existing High-Quality Transit Corridor

Within ½ mile of an existing High-Quality Transit Corridor:

A high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Planned High-Quality Transit Corridor

Within ½ mile of a planned High-Quality Transit Corridor that is included in the applicable Regional Transportation Plan.

Within an MPO

Must be located within the boundaries of a Metropolitan Planning Organization.

User must determine the remaining requirements:

Type of Housing

Residential and mixed use (at least 50 percent residential use based on total building square footage)

Density

Provide a minimum net density of at least 20 dwelling units per acre; if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.

SCS consistency

Consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the applicable Sustainable Communities Strategy.

Prior EIR

Must have incorporated all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to PRC § 21081.

PRC § 21159.28 (SB 375, Growth Inducing & Cumulative Impacts)

Under this provision, an environmental document does not need to reference, describe, or discuss (1) growth inducing impacts; or (2) any project specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network (see PRC § 21159.28(a)). Any environmental impact report is not required to reference, describe, or

discuss a reduced residential density alternative to address the effects of car and light-duty truck trips generated by the project (see PRC § 21159.28(b)).

Site Check considered the following requirements:

- [x] Within an MPO

  Must be located within the boundaries of a Metropolitan Planning Organization.

User must determine the remaining requirements:

- [ ] Type of Housing

  Residential or Mixed-Use

  A residential or mixed-use residential project is a project where at least 75 percent of the total building square footage of the project consists of residential use.

  Or a transit priority project (see if PRC § 21155.2 applies).

- [ ] SCS Consistency

  Consistent with the use designation, density, building intensity, and applicable policies specified for the project area in the applicable sustainable communities strategy.

- [ ] Prior EIR

  Project incorporates the mitigation measures required by an applicable prior environmental document.

Other Resources

For practitioner's tips from Ascent Environmental:

- Statutory Exemptions for Housing Projects
- Categorical Exemptions for Housing Projects

For more information on how to use a CEQA exemption or streamlining provision, please see AEP's CEQA Portal Topic Paper.

Not all CEQA provisions that may apply to a housing project have been included in this tool. Site Check is focused on the CEQA provisions that cover a variety of housing types. Based on the specifics of the project, users should also consider the following provisions:

- **Affordable Housing** - PRC § 21159.23 - CEQA statutory exemption for construction, conversion, or use of residential housing consisting of 100 or fewer units that is affordable to low-income households.
- **Agricultural Employee Housing** - PRC § 21159.22 - CEQA statutory exemption for the construction, conversion, or use of residential housing for agricultural employees.
- **Motel to Supportive Housing Conversions** - PRC § 21080.50 - CEQA statutory exemption for the conversion of a hotel, motel, apartment hotel, transient occupancy residential structure, or hostel for transitional and supportive housing. This exemption expires on January 1, 2025.
- **Existing Facility Reuse - Class 1**, CEQA Guidelines § 15301 - CEQA categorical exemption for the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. As a categorical exemption, this provision is subject to the limitations contained in CEQA Guidelines § 15300.2.

Ministerial/By Right Considerations

CEQA applies when a governmental agency can exercise judgment in deciding whether and how to carry out or approve a project. This makes the project "discretionary." (CEQA Guidelines, § 15357.) Where the law requires a governmental agency to act on a project using fixed standards and the agency does not have authority to use its own judgment, the project is called "ministerial," and CEQA does not apply. (CEQA Guidelines, §§ 15268(a), 15369.)

State and local laws and guidelines should be consulted when determining whether a project may be ministerial or "by right."

State Legislation:

- **SB 35** - GOV § 65913.4 - Creates a streamlined approval process for developments in localities that have not yet met their housing targets, provided that the development is on an infill site and complies with existing residential and mixed-use zoning. Participating developments must provide at least 10 percent of units for lower-income families. All projects over 10 units must be prevailing

wage and larger projects must use skilled and trained labor. See the SB 35 section of https://www.hcd.ca.gov/policy-research/lhp.shtml .

- **AB 2162** – GOV § 65650-65656 - Allows for by-right development for supportive housing anywhere zoned for multifamily and mixed-use housing.
- **AB 430** - GOV § 65913.15 - Establishes a ministerial approval process for housing development in the cities of Biggs, Corning, Gridley, Live Oak, Orland, Oroville, Willows and Yuba City. These provisions expire on January 1, 2026.

Local Legislation:

Housing projects may also be by right under local the zoning code on certain parcels. Check with the appropriate local jurisdiction for more information. Note, where local discretion is limited to design review, the project may not be subject to CEQA. (See McCorkle Eastside Neighborhood Group v. City of St. Helena (2019) 31 Cal.App.5th 80.)

APPENDIX B – STEPS FOR SCAG MODEL ADJUSTMENTS

Steps to Recalculate Average VMT:

1. Run the SCAG model with desired network and SED data
2. Compile Population and Total Employment by each TAZ from SED
3. Use peak and off-peak person trip matrices by trip purpose and combine into daily person trips. These matrices are saved in \msplit\Outputs\. The files are "PK_HBWD_HAUPAdTrips.mtx", "HBWS_IS_PK_Trips.mtx, "PK_HBSC_HAUPAdTrips.mtx", "PK_HBSH_HAUPAdTrips.mtx", "PK_HBCU_HAUPAdTrips.mtx", "PK_HBO_HAUPAdTrips.mtx", "PK_HBSP_HAUPAdTrips.mtx", "PK_HBSR_HAUPAdTrips.mtx", "PK_WBO_HAUPAdTrips.mtx", "PK_OBO_HAUPAdTrips.mtx", and similarly for off-peak.
4. Use the occupancy factors used in the model for each trip purpose to convert the daily person trips to vehicle trips.
5. Use lengths from the respective Skim matrices and multiply to the daily vehicle trips for Drive Alone, Carpool 2, and Carpool 3+ trips to compute daily VMT by purpose. These skim matrix files are “SPMATPK_DA_Tier1.mtx”, “SPMATPK_SR2_Tier1”, “SPMATPK_SR3_Tier1”, and similarly for off-peak.
6. Extract the daily VMT sum of productions by each TAZ and by trip purpose.
7. Extract the daily VMT sum of attractions by each TAZ and by trip purpose.
8. Combine the sum of productions by each TAZ for all the Home-Based trip purposes, i.e. “HBWD”, ”HBWS”, ”HBOALL”, ”HBSH”, ”HBSP”, ”HBSC”, ”HBCU”. This will be the Residential VMT for internal auto trips.
9. Combine the sum of attractions by each TAZ for only the Home-Based-Work trip purposes, i.e. “HBWD”, ”HBWS”. This will be the Work VMT for internal auto trips.
10. Since person trips are internal trips, the internal share for the SED data needs to be computed for each TAZ. Use vehicle trips from the Origin-Destination tables, the files are “AM_OD.mtx”, “PM_OD.mtx”, “MD_OD.mtx”, ”, “EVE_OD.mtx”, “NT_OD.mtx”. Combine these vehicle trips to daily trips.
11. Extract daily OD trips sum of productions separately for the internal and external vehicle trips.
12. Extract daily OD trips sum of attractions separately for the internal and external vehicle trips.
13. Multiply the share of internal trips from the OD trips to the population and employment data to get appropriate SED for the efficiency matrix.
14. Use the VMT sum of productions and attraction and internal share of the SED by each TAZ to determine Residential VMT per Capita and HBW VMT per Employee average rates at the City, County, or Regionwide levels.

APPENDIX C – CITY OF EL SEGUNDO TRANSPORTATION DEMAND MANAGEMENT (TDM) MEASURES

City of El Segundo Transportation Demand Management (TDM) Measures					
#	**TDM Measure**	**Description**	**TDM Type**	**Max VMT Reduction**	**VMT Reduction Type**
Transit Strategies					
1	Reduce Transit Headways	Makes transit service more appealing by reducing headways, reducing overall transit trip time, and encouraging riders to switch from auto to transit use.	Incentive / Infrastructure	2.5%	All
2	Transit Rerouting	Coordinate with local transit agency to provide or reroute existing transit services near the site	Infrastructure	3%	All
3	Transit Stops	Coordinate with local transit agency to provide bus stop near the site. Real time transportation information displays support on-the-go decision making to support sustainable trip making. Only get a reduction on a non-HQT line, cannot get both.	Infrastructure	2%	All
4	Safe and Well-Lit Access to Transit	Enhance the route for people walking or bicycling to nearby transit (typically off-site). Provide Emergency 911 phones along these routes to enhance safety.	Infrastructure	2%	All
5	Implement Neighborhood Shuttle	Implement project-operated or project-sponsored neighborhood shuttle serving residents, employees, and visitors of the project site	Incentive	13.4%	All
6	Transit Subsidies	Involves the subsidization of transit fare for residents and employees of the project site. This strategy assumes transit service is already present in the project area.	Incentive	10%	All
Communication & Information Strategies					
7	Required Travel Behavior Change Program	Involves the development of a travel behavior change program that targets individuals' attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. Provide a web site that allows employees to research other modes of transportation for commuting. Employee-focused travel behavior change program that targets individuals attitudes, goals, and	Incentive	4%	All

City of El Segundo Transportation Demand Management (TDM) Measures					
#	**TDM Measure**	**Description**	**TDM Type**	**Max VMT Reduction**	**VMT Reduction Type**
		travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits.			
8	Promotions & Marketing	Involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices with passive educational and promotional materials. Marketing and public information campaign to promote awareness of TDM program with an on-site coordinator to monitor program.	Incentive		All
9	Required Commute Trip Reduction Program	Employee-focused travel behavior change program that targets individuals attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits.	Incentive		Commute
10	On-site TDM Program Manager and TDM Marketing Materials		Infrastructure		All
11	Commute Assistance Center	Provide a computer kiosk that allows employees to research other modes of transportation for commuting.	Infrastructure		All
Commuting Strategies					
12	Employer Sponsored Vanpool or Shuttle	Implementation of employer-sponsored employee vanpool or shuttle providing new opportunities for access to connect employees to the project site.	Incentive / Infrastructure	13.4%	Commute
13	Preferential Carpool / Vanpool Parking Spaces	Reserved carpool / vanpool spaces closer to the building entrance.	Infrastructure	10%	All
14	Passenger Loading Zones for Carpool / Vanpool	Provide easy access for carpools or vanpools.	Infrastructure	5%	All
15	On-site Carts or Shuttles or bikes	Provide on-site cart or shuttle for employees to travel across campus.	Incentive / Infrastructure	4%	All

City of El Segundo Transportation Demand Management (TDM) Measures					
#	**TDM Measure**	**Description**	**TDM Type**	**Max VMT Reduction**	**VMT Reduction Type**
16	Emergency Ride Home (ERH) Program	Provides an occasional subsidized ride to commuters who use alternative modes. Guaranteed ride home for people if they need to go home in the middle of the day due to an emergency or stay late and need a ride at a time when transit service is not available. This supplemental to the other trip reduction strategies.	Incentive	9%	Commute
17	Alternative Work Schedule	Flextime, Compressed Work Week (CWW), and staggered shifts	Incentive	15%	Commute
18	Telework (Telecommuting, Distance-Learning, etc.)	Use of telecommunications as a substitute for physical travel.	Incentive	22%	Commute
19	On-site Childcare	Provides on-site childcare to remove the need to drive a child to daycare at a separate location.	Infrastructure	2%	All
Shared Mobility Strategies					
20	Ride-Share Program	Increases vehicle occupancy by providing ride-share matching services, designating preferred parking for ride-share participants, designing adequate passenger loading/unloading and waiting areas for ride-share vehicles, and providing a website or message board to connect riders and coordinate rides. Need a point person form the business on-site	Incentive	5%	Commute
21	Car Share	Implement car sharing to allow people to have on-demand access to a vehicle, as-needed. This may include providing membership to an existing program located within 1/4 mile, contracting with a third-party vendor to extend membership-based service to an area, or implementing a project-specific fleet that supports the residents and employees on -site.	Incentive		All
		Provide an on-site car vehicle for employees who use alternative transportation to commute to work, to use for short trips during the	Incentive		Commute

City of El Segundo Transportation Demand Management (TDM) Measures					
#	TDM Measure	Description	TDM Type	Max VMT Reduction	VMT Reduction Type
		workday. For example, this allows for employees to run errands or travel for lunch.			
22	Designated Parking Spaces for Car Share Vehicles	Reserved car share spaces closer to the building entrance.	Infrastructure		All
23	School Carpool Program	Implements a school carpool program to encourage ride-sharing for students.	Incentive	15.8%	School
Bicycle Infrastructure Strategies					
24	Bike Share	Implement bike share to allow people to have on-demand access to a bicycle, as-needed.	Incentive Infrastructure	0.25%	All
25	Implement/Improve On-street Bicycle Facility	Implements or provides funding for improvements to corridors and crossings for bike networks identified within a one-half mile buffer area of the project boundary, to support safe and comfortable bicycle travel.	Infrastructure	0.625%	All
26	Include Bike Parking per City Code	Implements long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations	Infrastructure	3%	All
27	Include Secure Bike Parking and Showers in excess of City Code	Implements additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel.	Infrastructure		
28	Bicycle Repair Station / Services	On-site bicycle repair tools and space to use them supports on-going use of bicycles for transportation.	Infrastructure		
Neighborhood Enhancement Strategies					
29	Traffic Calming Improvements	Implements traffic calming measures throughout and around the perimeter of the project site that encourage people to walk, bike, or take transit within the development and to the development from other locations.	Infrastructure	1%	All

City of El Segundo Transportation Demand Management (TDM) Measures					
#	**TDM Measure**	**Description**	**TDM Type**	**Max VMT Reduction**	**VMT Reduction Type**
30	Pedestrian Network Improvements	Implements pedestrian network improvements throughout and around the project site that encourages people to walk.	Infrastructure	2%	All
Parking Strategies					
31	Reduce Parking Supply	Changes on-site parking supply to provide less than the amount required by municipal code. Permitted reductions could utilize mechanisms such as TOC, Density Bonus, Bike Parking ordinance, or locating in a Specific Plan Area.	Infrastructure	10%	All
32	Parking Cash-Out	Provide employees a choice of forgoing current parking for a cash payment to be determined by the employer. The higher the cash payment, the higher the reduction.	Incentive	5%	Commute
33	Price Workplace Parking	Implements workplace parking pricing for employees at employment locations for all land-use contexts and all types of development that include employment where trips originate at home and terminate at work.	Incentive	10%	Commute
34	Residential Area Parking Permits	Implementation of residential permit parking zones for long-term use of on-street parking in residential areas.	Incentive	0.25%	All
35	Parking Management Strategies	Strategies to encourage efficiency in parking facilities and improve the quality of service to parking users.	Incentive	5%	Valet
Mi**scellaneous Strategies**					
36	Virtual Care Strategies for Hospitals	Resources to allow patients to access healthcare services or communicate with healthcare staff through online or off-site programs.	Infrastructure	6%	Hospital / MOB Visitors
37	On-site Affordable Housing	Provides on-site affordable housing close to TOD or work place/business	Land Use	4%	All
38	Delivery Services	Provide delivery services by bicycle, on foot, or in a delivery vehicle that makes multiple stops.	Incentive	1%	All