



## MEMORANDUM

To:	Raul Flore Lucila Martinez City of Whittier, California	Date:	November 2, 2022
From:	David S. Shender, P.E. <i>DSS</i> Grace Turney, E.I.T. <i>GT</i> LLG Engineers	LLG Ref:	1-21-4414-1
Subject:	Golden Oaks Senior Living – Vehicle Miles Traveled Assessment		

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Linscott, Law & Greenspan, Engineers (LLG) has prepared this memorandum to summarize the vehicle miles traveled (VMT) assessment prepared for the proposed Golden Oaks Senior Living project (“proposed project”) located in the City of Whittier, 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 and the City of Whittier’s environmental review procedures, a detailed review of the applicable VMT screening criteria contained in the “City of Whittier Vehicle Miles Traveled (VMT) Transportation Study Guidelines”<sup>1</sup>, and conclusions regarding the proposed project’s VMT impacts.

### ***Description of Proposed Project***

The proposed project site is located at 6018 Norwalk Boulevard in the City of Whittier, California. The project site is generally bounded by existing commercial development to the north, an existing public alleyway to the east and south, and Norwalk Boulevard to the west. The project site and general vicinity are shown in **Figure 1**.

The proposed project consists of the development of a senior community providing 25 dwelling units. The senior community will provide one-bedroom units ranging from 578 to 627 square feet, with eight (8) units located on the ground floor and the remaining 17 units located on the second floor. A shared laundry facility and recreational room will be provided on-site. A total of 19 private parking spaces accessible from the public alleyway bordering the project site will be provided for the residents. Each residential parking space will be equipped with roll-up doors to provide security. In addition, four (4) guest spaces will be provided, including one (1) handicap accessible parking space, at the southwest corner of the project site. The guest spaces will be accessible from the public alleyway bordering the project site. The proposed site plan is illustrated in **Figure 2**.

<sup>1</sup> City of Whittier, “City of Whittier Vehicle Miles Traveled (VMT) Transportation Study Guidelines”, October 2021.

The project site is currently occupied by two buildings providing a mix of nine (9) apartment dwelling units and three (3) retail tenant spaces totaling 2,798 square feet. The existing buildings and surface parking areas will be demolished to accommodate the development of the proposed project.

### ***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.

In compliance with Senate Bill 743 and CEQA, the City of Whittier has developed a methodology for evaluating transportation impacts based on VMT for land use projects which is consistent with the recommendations provided by OPR in the *Technical Advisory*. The City has prepared the "Vehicle Miles Traveled (VMT) Transportation Study Guidelines" ("Guidelines"), which sets forth the screening criteria, thresholds of significance, and analysis methodology for evaluating the VMT impacts of land use development projects in the City of Whittier.

### **Screening Criteria**

Traditionally, public agencies have set certain thresholds to determine whether a project requires detailed transportation analysis or if it could be assumed to have less than significant environmental impacts without additional study. Consistent with the recommendations provided by OPR in the *Technical Advisory*, the City's Guidelines recognize a number of screening criteria which may be applied to screen proposed projects out of detailed VMT analysis. These criteria are generally based on a project's size, location, or accessibility to transit. 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 presented in the *Technical Advisory*, projects which are screened out of detailed VMT assessment based on these criteria are generally presumed to have less than significant

transportation impacts, absent any substantial evidence to the contrary. Projects which are not screened out would be required to conduct a formal VMT analysis in order to determine the significance of project impacts. The following excerpt of the City of Whittier’s “Vehicle Miles Traveled (VMT) Transportation Study Guidelines” presents the VMT screening criteria.

TABLE 1: VMT SCREENING GUIDANCE	
Screening Categories	Project Requirements to Meet Screening Criteria
Project Size	A project that generates 110 or fewer daily trips.
Locally Serving Retail	A project that has locally serving retail uses that are 50,000 square feet or less, including specialty retail, shopping center, grocery store, pharmacy, financial services/banks, fitness center or health club, restaurant, and café. If the project contains other land uses, those uses need to be considered under other applicable screening criteria. Proposed projects less than 50,000 square feet that are unique uses or regional draws, may require additional information or evidence that they will be local-serving.
Project Located in a Low VMT Area	A residential or office project that is located in a Traffic Analysis Zone (TAZ) that is already 15% below the City and Sphere of Influence (SOI) Baseline VMT.
Transit Proximity	Projects that are located within a ½ mile of the Eastside Transit Corridor Phase 2 Project, or a ½ mile of where two or more 15-minute (during commute hours) bus routes intersect or within a ½ mile of a corridor served by 15-minute (during commute hours) bus service. In addition, the project should have the following characteristics: <ul style="list-style-type: none"> <li>- A Floor Area Ratio (FAR) of 0.75 or greater</li> <li>- Is consistent with the applicable SCAG Sustainable Community Strategy (SCS) (as determined by the City)</li> <li>- Does not provide more parking than required by the City</li> <li>- Does not replace affordable housing units</li> </ul>
Affordable Housing	A residential project that provides affordable housing units; if part of a larger development, only those units that meet the definition of affordable housing satisfy the screening criteria.
Transportation Facilities	Transportation projects that promote non-auto travel, improve safety, or improve traffic operations at current bottlenecks, such as transit, bicycle and pedestrian facilities, intersection traffic control (e.g., traffic signals or roundabouts), or widening at intersections to provide new turn lanes.

City of Whittier Vehicle Miles Traveled (VMT) Transportation Study Guidelines, October 2021.

Based on a review of the project’s development program, location, and other pertinent factors, it was determined that the City’s “Project Size” screening criteria is applicable to the proposed project.

As stated in the City’s Guidelines, a project meets the “Project Size” screening criteria if it generates 110 or fewer daily trips. The *Technical Advisory* states that

projects which generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant transportation impact, and 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.”

Traffic trip generation is expressed in vehicle trip ends, which are defined as one-way vehicular movements, either entering or exiting the generating land use. The traffic volumes anticipated to be generated by the proposed project over a typical 24-hour weekday period (i.e., daily) were forecast utilizing trip generation rate information provided in the Institute of Transportation Engineers’ (ITE) *Trip Generation Manual*, 11<sup>th</sup> Edition<sup>2</sup>. Specifically, trip generation average rates for Land Use 252: Senior Adult Housing – Multifamily were utilized to forecast the trips generated by the proposed senior dwelling units. For informational purposes, a forecast of the traffic volumes anticipated to be generated by the senior residences during the typical weekday AM and PM peak hours was also prepared.

The trip generation forecast for the proposed project is summarized in *Table 1*. As presented in *Table 1*, the proposed senior dwelling units are expected to result in 81 daily vehicle trip ends (approximately 41 inbound and approximately 41 outbound trips) over a 24-hour period on a typical weekday. Because the senior residences generate fewer than 110 additional daily trips, the City of Whittier’s “Project Size” screening criteria is satisfied.

#### Impact Conclusions

Based on the City of Whittier’s VMT screening criteria and the guidance provided in the *Technical Advisory*, projects which generate or attract fewer than 110 vehicle trips per day generally may be assumed to cause a less than significant transportation impact. The senior dwelling units are expected to generate 81 daily vehicle trip ends, which satisfies the City’s “Project Size” screening criteria. The project is therefore

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<sup>2</sup> Institute of Transportation Engineers *Trip Generation Manual*, 11<sup>th</sup> Edition, Washington D.C., 2021.

determined to have a less than significant VMT impact, and no further VMT analysis is required.

### ***Summary and Conclusions***

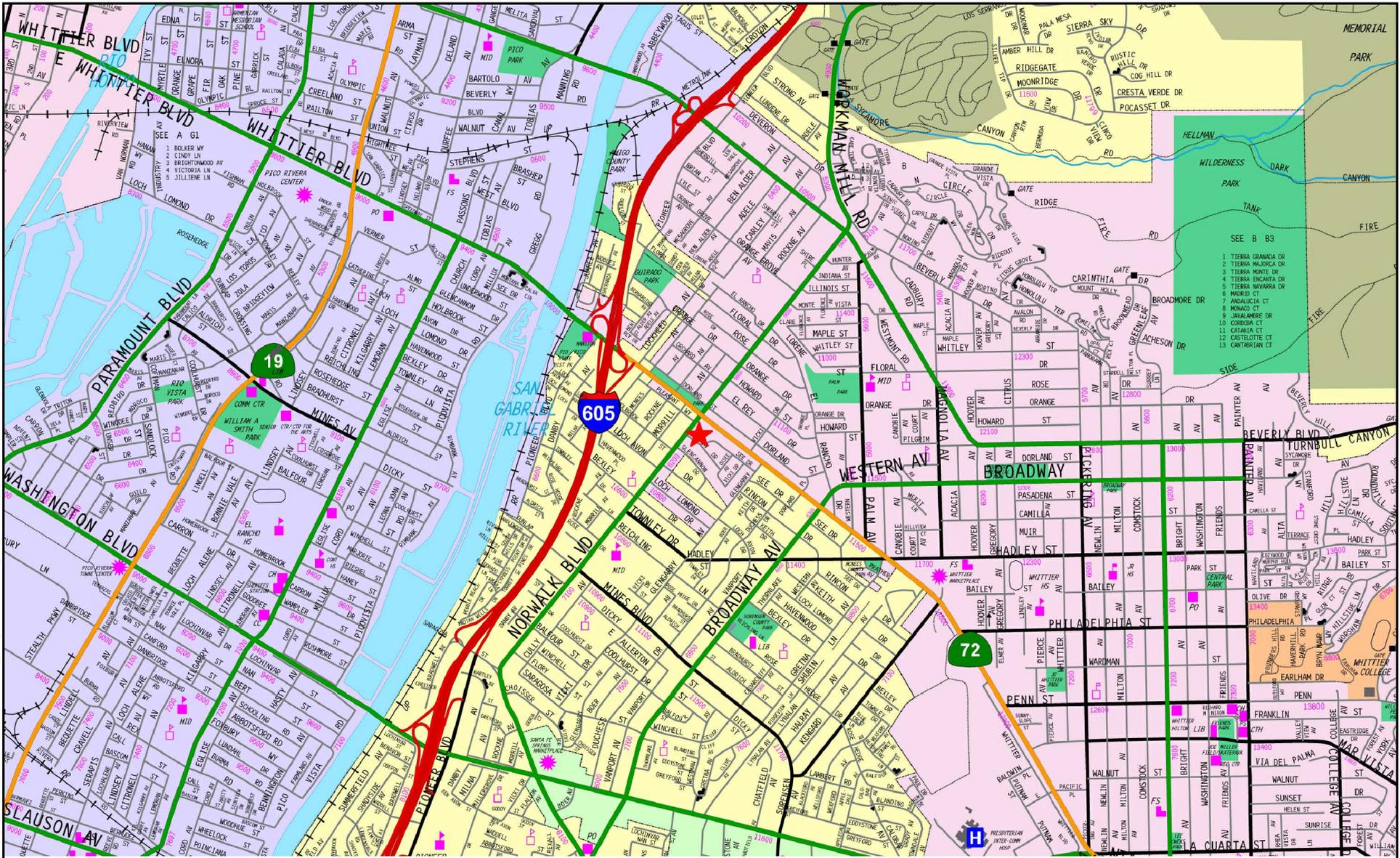
Based on a review of the VMT screening criteria set forth in the City of Whittier's "Vehicle Miles Traveled (VMT) Transportation Study Guidelines", it is determined that the proposed Golden Oaks Senior Living project satisfies the "Project Size" screening criteria. As previously stated, proposed projects 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. Therefore, through satisfaction of one or more of the screening criteria, the proposed Golden Oaks Senior Living project is determined to have a less than significant transportation impact and therefore no additional VMT analysis is required.

Please feel free to call us at 626.796.2322 with any questions or comments regarding the VMT assessment prepared for the proposed Golden Oaks Senior Living project.

### **Attachments**

- c: David Pickard, Pickard Architects
- Michaela Pierandozzi, Pickard Architects
- Scott Schalliol, DLS Builders
- Warren Parchan, DLS Builders

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MAP SOURCE: RAND MCNALLY & COMPANY



LINSCOTT  
LAW &  
GREENSPAN  
engineers

★ Project Site

FIGURE 1  
VICINITY MAP

GOLDEN OAKS SENIOR LIVING PROJECT

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SOURCE: PICKARD ARCHITECTS

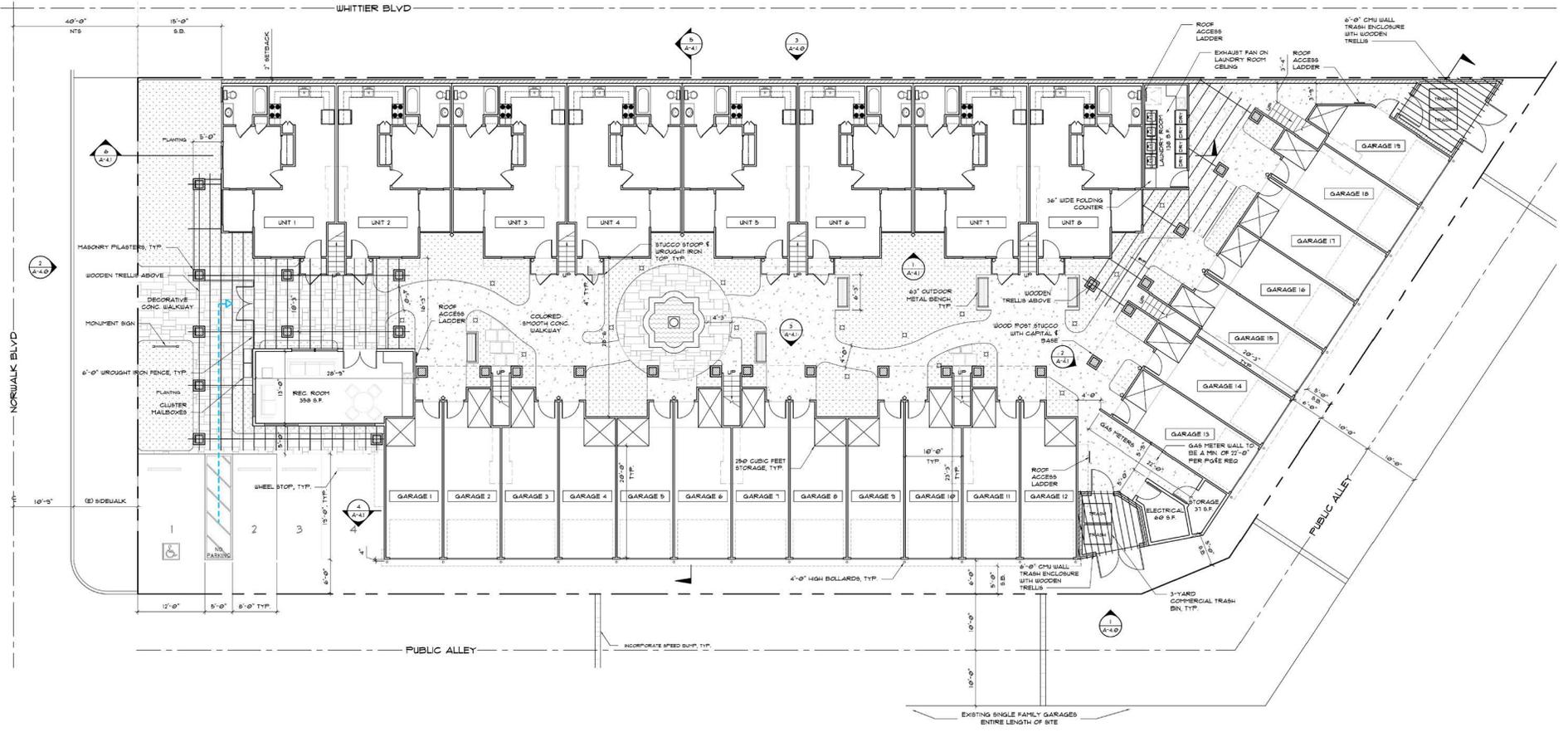


FIGURE 2  
SITE PLAN

Table 1  
PROJECT TRIP GENERATION FORECAST

TRIP GENERATION RATES [1]									
ITE LAND USE CATEGORY	ITE LAND USE CODE	VARIABLE	WEEKDAY DAILY	WEEKDAY AM PEAK HOUR			WEEKDAY PM PEAK HOUR		
				IN (%)	OUT (%)	TOTAL	IN (%)	OUT (%)	TOTAL
				Senior Adult Housing - Multifamily	252	Per Dwelling Unit	3.24	34%	66%

PROJECT TRIP GENERATION FORECAST									
LAND USE	ITE LAND USE CODE	SIZE	DAILY TRIP ENDS [2] VOLUMES	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
				Senior Residences	252	25 DU	81	2	3
<b>PROJECT TRIPS</b>			<b>81</b>	<b>2</b>	<b>3</b>	<b>5</b>	<b>3</b>	<b>3</b>	<b>6</b>

[1] Source: ITE "Trip Generation Manual", 11th Edition, 2021.

[2] Trips are one-way traffic movements, entering or leaving.

CITY OF WHITTIER  
PUBLIC WORKS DEPARTMENT

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November 8, 2022

City of Whittier  
13230 Penn Street  
Whittier, CA 90602

Re: Golden Oaks Senior Living Apartments  
6018 Norwalk Boulevard, Whittier, CA 90606  
Transportation Demand Management Letter

To Whom It May Concern:

Pursuant to the City's request, please find the following comments intended to address the Transportation Demand Management issues for the referenced project.

The proposed Golden Oaks Senior Living project is planned to include a number of features that will encourage residents to make use of alternate travel modes such as walking, biking, or transit in place of private vehicle trips. Since the project is determined to have a less than significant impact on vehicle miles traveled (VMT), no formal Transportation Demand Management (TDM) measures are required to be provided. However, based on research published by the California Air Pollution Control Officers Association (CAPCOA), the following project features are expected to promote the use of alternate travel modes, thereby potentially reducing the number of private vehicle trips:

- The project is planned to provide landscaped and lighted pedestrian pathways connecting the dwelling units with facilities on site (i.e., laundry room, recreational room, etc.), as well as to the existing public sidewalks along Norwalk Boulevard and other adjacent roadways. The exclusive pedestrian walkways will minimize the extent of pedestrian interaction with vehicles at the site and will provide a safe, convenient, and comfortable environment for pedestrians to access the project site from the public right-of-way. The project has therefore been designed to encourage pedestrian activity and walking as a travel mode.
- The project site is located in close proximity to existing transit service provided along Whittier Boulevard and Norwalk Boulevard, in an area which the City has identified as a Transit Priority Area. Bus transit stops are provided within 0.1-miles of the project site at the Norwalk Boulevard/Whittier Boulevard intersection for transit lines operated by Montebello Bus Lines (Route 10) and Norwalk Transit System (Route 1). The project site is well located to facilitate the use of transit as a travel mode.
- The proposed project is planned to provide 19 private, enclosed parking spaces for project residents, which is consistent with the minimum number of parking spaces required in the Whittier Municipal Code for senior dwelling units. The project is also planned to provide four (4) visitor parking spaces, which is less





than the visitor parking spaces that would be required of a similarly sized multi-family residential project. The proposed project will not provide excessive parking spaces, and thus will not encourage the use of private vehicles over alternative travel modes.

- The project will increase the density of residential development at the project site. The existing site is currently occupied by nine (9) apartment dwelling units, which will be replaced with 25 senior dwelling units. According to the City of Whittier's "Vehicle Miles Traveled (VMT) Transportation Study Guidelines" (October 2021) and CAPCOA's "Quantifying Greenhouse Gas Mitigation Measures" (2010), increased density may affect the number and length of vehicle trips and may provide greater options to utilize alternate modes of travel. The proposed senior living project will result in an approximately 175% increase in density.

Sincerely,

Pickard Architects

David W. Pickard III, Esq., AIA  
President

