

Appendix A
VMT Screening Analysis



TECHNICAL MEMORANDUM

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Date: March 7, 2025

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LLG Ref: 2.23.4756.1

Pasadena
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Subject: ***Updated Vehicle Miles Traveled (VMT) Screening Analysis
Grevillea Hotel Project, Hawthorne***

As requested, Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit this updated Vehicle Miles Traveled (VMT) Screening Analysis Memorandum for the proposed Grevillea Hotel Project (hereinafter referred to as “Project”) in the City of Hawthorne, California. The updated assessment evaluates the current Project description as presented in the Project Site Plan prepared by Ao, dated March 2025. This Technical Memorandum presents the VMT screening criteria, for which the approach and methodology outlined herein are consistent with the *City of Hawthorne SB 743 Implementation Guidelines (dated April 2023)*. The City’s guidelines provide additional detail on the language and analysis procedures described in this Technical Memorandum.

The following sections of this Technical Memorandum summarize the Project description, the City’s VMT screening criteria, analysis methodology, analysis and conclusions.

PROJECT LOCATION AND DESCRIPTION

The Project site is a 0.51±-acre rectangular-shaped parcel of land that is located on the southeast corner of Grevillea Avenue and Imperial Highway. The subject property is currently vacant, but was partially developed with a restaurant use. Access to the Project site appears to have been previously provided via a “right-turn only” driveway located on Imperial Highway. The current land use for the property in the Land Use Element of the City of Hawthorne General Plan is Specific Plan – Hospitality Commercial as illustrated in the City’s Land Use Map, whereas the current zoning for the property is Regional Commercial (C-R) and Mixed-Use Overlay.

The proposed Project includes the development of a 43,051 square-foot (SF), five-level hotel project with 78 rooms and approximately 12,070 SF of hotel amenities, inclusive of a pool. The Project will provide limited services as no restaurant and limited to no meeting/conference space is available for use in this hotel.

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Guest/visitor parking will be provided in the Project's parking structure via 100% valet service, with a parking supply of 80 spaces that consists of 24 compact spaces (double stacked), 40 standard spaces (double stacked), 6 standard spaces and 10 valet spaces provided within Level 2 of the parking structure drive aisle should guest vehicles need to be "staged" during peak arrival and/or departure times when guest check-in and/or check-out. Vehicular access to the Project will be provided via a proposed "right-turn only" driveway on Imperial Highway. It should be noted that there is a driveway located along Grevillea Avenue that is for service vehicles only. **Figure 1** presents a Vicinity Map that illustrates the general location of the Project and surrounding street system. **Figure 2** presents the existing aerial of the Project site. **Figure 3** presents the proposed Project site plan, prepared by Architects Orange.

VMT SCREENING ASSESSMENT

Under the VMT methodology, screening is used to determine if a project will be required to conduct a detailed VMT analysis. The following section discusses the various screening methods outlined in the *City of Hawthorne SB 743 Implementation Guidelines (dated April 2023)*, and outlines whether the Project will screen-out, based on its location, size, and/or land use. Per the City's Guidelines, land development projects that have one or more of the following attributes is sufficient to screen the project out of further evaluation.

The *City of Hawthorne SB 743 Implementation Guidelines (dated April 2023)* state the following screening methods:

Small Projects¹

"This applies to projects with low trip generation per existing CEQA exemptions. Note that this includes any land use type (residential, office, open space, neighborhood parks, etc.)

Project is presumed to cause a less-than-significant impact if it would:

- *Generate less than 110 trips per day per the ITE Manual or other acceptable source determined by City of Hawthorne.*

Unless:

- *Be inconsistent with the Sustainable Communities Strategy as determined by the City of Hawthorne."*

¹ 2018 OPR Guidance, page 12

According to **Table 1 – Project Trip Generation**, based on the *Trip Generation, 11th Edition, Institute of Transportation engineers (ITE)* the proposed Project will generate 623 daily trips, which will exceed the threshold of 110 daily trips.

Based on the above, the proposed Project will not screen out under this criteria since the proposed Project will generate more than 110 daily trips.

Projects Near High Quality Transit²

“High quality transit provides a viable option for many to replace automobile trips with transit trips resulting in an overall reduction in VMT.

Project is presumed to cause a less-than-significant impact if it would:

- *Be within a ½ mile of an existing major transit stop³.*

Unless:

- *Has a Floor Area Ratio (FAR) of less than 0.75; or*
- *Includes more parking, excluding on-street parking, for use by residents, customers, or employees of the project than required by the City of Hawthorne zoning code; or*
- *It is inconsistent with the Sustainable Communities Strategy as determined by the City of Hawthorne; or*
- *Replaces affordable residential units with a smaller number of moderate-or high-income residential units.”*

To evaluate if the proposed Project is located within a ½ mile of a major transit stop or within a ½ mile of a HQTC, the City of Hawthorne Transit Priority Area (TPA) map⁴ is utilized and illustrated on **Figure 4**.

As shown, the Project is located on the southeast corner of Grevillea Avenue and Imperial Highway within the City’s Transit Priority Areas. From a review of this figure, the subject property is within a High-Quality Transit Corridor, which includes the Hawthorne Boulevard and Imperial Highway corridors, and further yet within ½ mile of a Major Transit Stop, the Hawthorne / Lennox Metro C Rail (Green Line) Transit Station located on Hawthorne Boulevard, north of Imperial Highway and south of the I-105 Freeway.

² 2018 OPR Guidance, page 13. Refer to Appendix C for City specific detail on high-quality transit.

³ Pub. Resources Code, § 21064.3 (“‘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 a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”).

⁴ Refer to Appendix C for map of High-Quality Transit Corridor.



Since the proposed Project is located in the Transit Priority Area (TPA) as shown in *Figure 4*, a secondary TPA analysis has been conducted as presented below:

Floor Area Ratio (FAR) Assessment

Floor Area Ratio (FAR) is the relationship between the total amount of usable floor area of development and the total area of the development site. Based on the Project development information, the proposed 75-room hotel is comprised of 43,051 total SF of building area. Based on a parcel size of approximately 0.51±-acres (equivalent to 22,200 SF), the FAR for the Project can be calculated as follows:

Based on the above calculation, the proposed Project has a FAR less than 1.94.

$$FAR = \frac{43,051 SF}{22,200 SF} = 1.94$$

Parking Assessment

Per City of Hawthorne Municipal Code Section 17.58.030.B.11. – Required Number of Spaces: Hotel, the following parking requirements are applied to the Project:

Hotels:

- a. Hotels with Restaurant and/or Conference Space. One space for each of the first one hundred rooms; three-fourths space for each of the next fifty rooms; and one-half space for each room above one hundred fifty rooms.
- b. Hotels with Airport Shuttle. One space for each of the first one hundred rooms; three-fourths space for each of the next seventy-five rooms; and one-half space for each room above two hundred rooms.
- c. Hotels without Amenities. One space per room, lot must be at least one acre.

Application of the above City parking requirements, as well as those required due to location of the Project and designation with a Mixed-Use Overlay which add two (2) manager spaces, and the Project’s proposed parking supply parking is summarized in the table below:

Description	Required Per City	Provided Parking Spaces
78-room hotel	80	80



As shown above, the proposed Project will provide no more parking than required by the City.

To assess the peak parking demand of the Project, parking rates published in Parking Generation, published by the Institute of Transportation Engineers (ITE)⁵ provide sources for parking ratio information. “Land Use 312: Limited-Service Hotel” of Parking Generation, 6th Edition indicates an average parking demand ratio of 0.66 spaces per room, with an 85th percentile value of 0.82 spaces per room. It should be noted that when calculating the parking needs for a site the “design level” parking requirement is typically based on the 85th percentile value.

Given the above, to estimate the parking demand for the proposed Project, a ratio of 0.82 spaces per room is utilized and applied to the Project’s 78 rooms, which results in a peak parking demand of 64 spaces. Based on a parking supply of 75 spaces, the Project site’s parking demand is satisfied.

Sustainable Communities Strategy Assessment

As described in the Project description, the subject property in the City’s General Plan has a designated Land Use of Specific Plan – Hospitality Commercial whereas the SCAG Land Use Designation is Commercial Services, which includes hotel use. As such, since the General Plan designation is consistent with the SCAG designation the project is consistent with the applicable Sustainable Communities Strategy (SCS), subject to confirmation by City staff. Attached at the end of this letter are the SCAG Data/Map Book land use designations which shows the consistent land uses (*See Attachment 1*).

Affordable Housing Assessment

The proposed Project will not replace existing affordable residential units since the Project site is currently vacant.

TPA Screening Conclusion

Based on the above, the proposed Project will screen out under this criteria, since it is located in a TPA and it satisfies all the secondary TPA criteria.

*Affordable Housing*⁶

⁵ 6th Edition, Washington, DC, 2023.

⁶ 2018 OPR Guidance, page 14. As described, “Evidence supports a presumption of less than significant impact for a 100 percent affordable residential development (or the residential component of a mixed-use development) in infill locations. Lead agencies may develop their own presumption of less than significant impact for residential projects (or residential portions of mixed-use projects) containing a particular amount of affordable housing, based on local circumstances and evidence.”

“Lower-income residents make fewer trips on average, resulting in lower VMT overall.

Project is presumed to cause a less-than-significant impact if it would:

- *Provide a high percentage of affordable housing, as determined by the City of Hawthorne.”*

Based on the above, the proposed Project will not screen out under this criteria since the proposed Project is a hotel development and not an affordable housing project.

Local-Serving Retail⁷

“The introduction of new Local-serving retail has been determined to reduce VMT by shortening trips that will occur out of necessity (groceries, other essentials, etc.).

Project is presumed to cause a less-than-significant impact if it would include:

- *A local serving retail development as determined by the City of Hawthorne*⁸.

Unless:

- *The nature of the service is regionally focused as determined by the City of Hawthorne.”*

Based on the above, the proposed Project will not screen out under this criteria since the proposed Project is a hotel development and not a local-serving retail development.

Local Essential Service⁹

“As with Local-Serving Retail, the introduction of new Local Essential Services shortens non-discretionary trips by putting those goods and services closer to residents, resulting in an overall reduction in VMT.

Project is presumed to cause a less-than-significant impact if it would:

- *Include a building that is less than 50,000 square feet; and*

⁷ 2018 OPR Guidance, page 16

⁸ Local-serving retail is where no single on-site store exceeds 50,000 square feet and its customer base is the surrounding area that were previously making trips further away to a store offering similar products

⁹ Based on assumption that, like local-serving retail, the addition of necessary local in-person services will reduce VMT given that trips to these locations will be made irrespective of distance given their non-discretionary nature.

- *Land Use is:*
 - *Day care center; or*
 - *Public K-12 School; or*
 - *Police or Fire facility; or*
 - *Medical/Dental office building; or*
 - *Hospital and clinics; or*
 - *Government offices (in-person services such as post office, library, and utilities)*

Unless:

- *The nature of the service is regionally focused as determined by the City of Hawthorne.”*

Based on the above, the proposed Project will not screen out under this criteria since the proposed Project is a hotel development and not a local essential service.

Map-Based Screening

“This method eliminates the need for complex analyses, by allowing existing VMT data to serve as a basis for the screening smaller developments.

Note that screening is limited to residential and office projects utilizing the maps.

Project is presumed to cause a less-than-significant impact if it would:

- *Be located in an area of development that is under the threshold as shown on a screening map as allowed by City of Hawthorne¹⁰.*

Unless:

- *Represent significant growth as to substantially change regional travel patterns as determined by the City of Hawthorne.”*

Based on the above, the proposed Project will not screen out under this criteria since the proposed Project is a hotel development and not a residential or office project.

Redevelopment Projects¹¹

“Projects with lower VMT than existing on-site uses, can under limited circumstances, be presumed to have a non-significant impact. In the event this

¹⁰ Refer to Appendix A for screening maps.

¹¹ 2018 OPR Guidance, Page 18



screening does not apply, projects should be analyzed as though there is no existing uses on site (project analysis cannot take credit for existing VMT).

Project is presumed to cause a less-than-significant impact if it would:

- *Replaces an existing VMT-generating land use and does not result in a net overall increase in VMT.*

Unless:

- *The project replaces an existing VMT-generating land use and results in a net overall increase in VMT; or*
- *The existing land use has been vacant for more than 2 years.”*

Based on the above, the proposed Project will not screen out under this criteria since the proposed Project site is currently vacant.

CONCLUSIONS

Based on the *City of Hawthorne SB 743 Implementation Guidelines (dated April 2023)*, the VMT screening methodology, criteria, analysis and results outlined in this Technical Memorandum, the proposed Project is located in a Transit Priority Area (TPA) and the land use is consistent with the City’s Land Use Element and the SCAG SCS. Therefore, the proposed Project is exempt from the preparation of any further VMT analysis and may be presumed to have a less than significant CEQA related transportation impact.

* * * * *

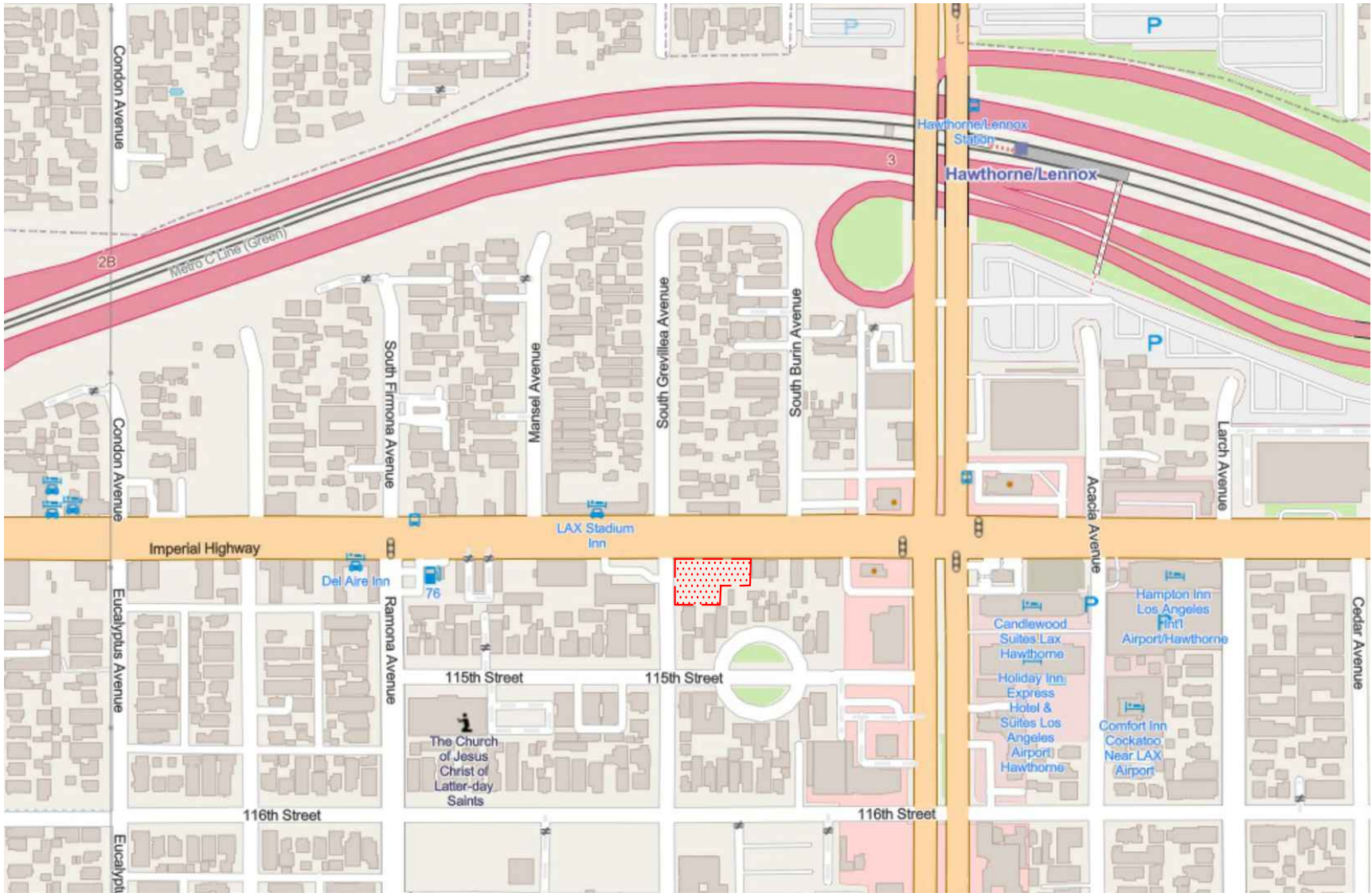
We appreciate the opportunity to provide this Technical Memorandum. Should you have any questions regarding the memorandum, please contact us at (949) 825-6175.

Attachments

- Figure 1: Vicinity Map
- Figure 2: Existing Aerial Photograph
- Figure 3: Proposed Site Plan
- Figure 4: Hawthorne Transit Priority Areas

Table 1: Project Trip Generation

Attachment 1: SCAG Data/Map Book for City of Hawthorne



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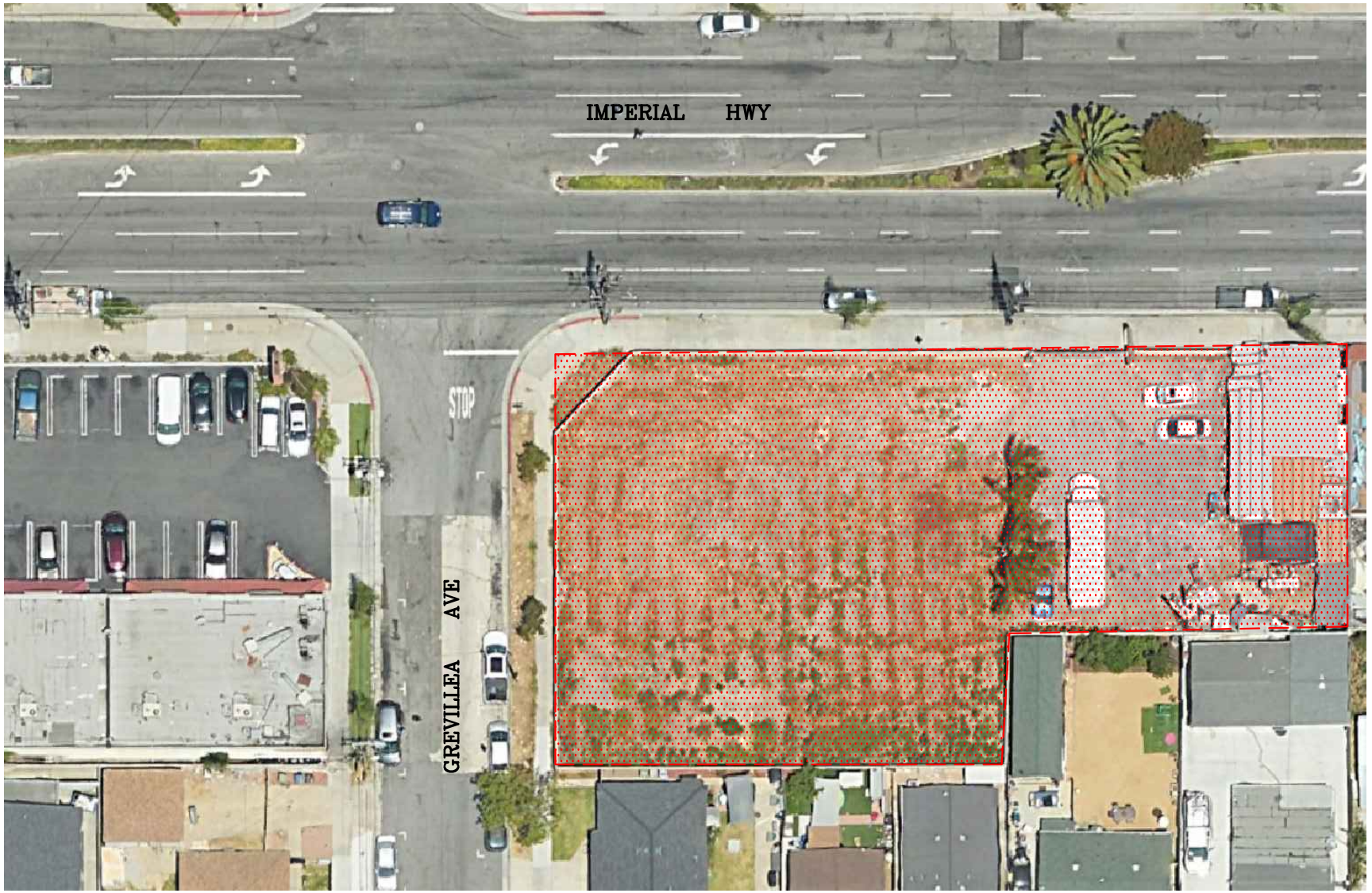


SOURCE: OPEN STREETS

KEY
..... = PROJECT SITE

FIGURE 1

VICINITY MAP
 GREVILLEA HOTEL, HAWTHORNE



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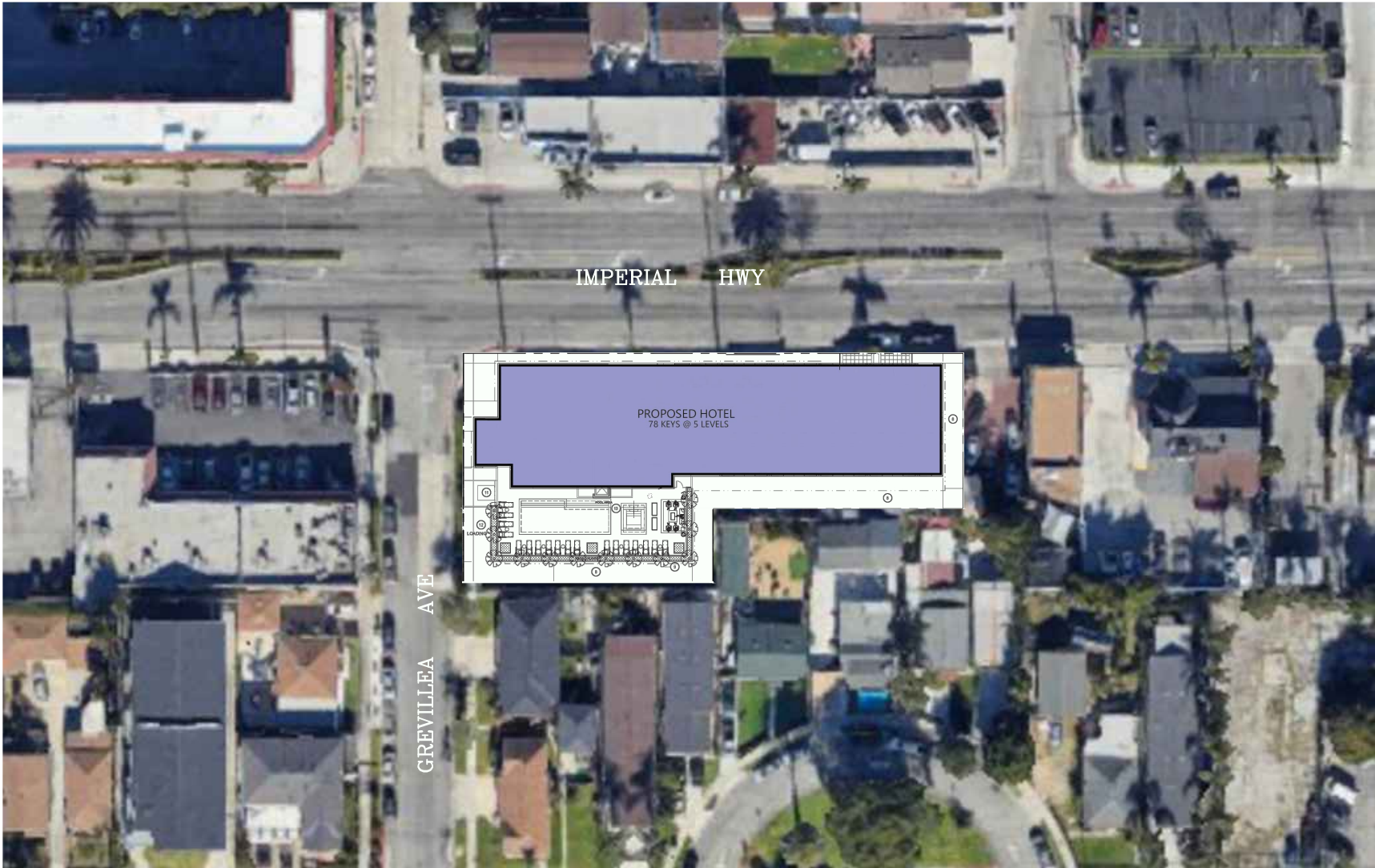
SOURCE: GOOGLE

KEY

 = PROJECT SITE

FIGURE 2

EXISTING AERIAL MAP
GREVILLEA HOTEL, HAWTHORNE



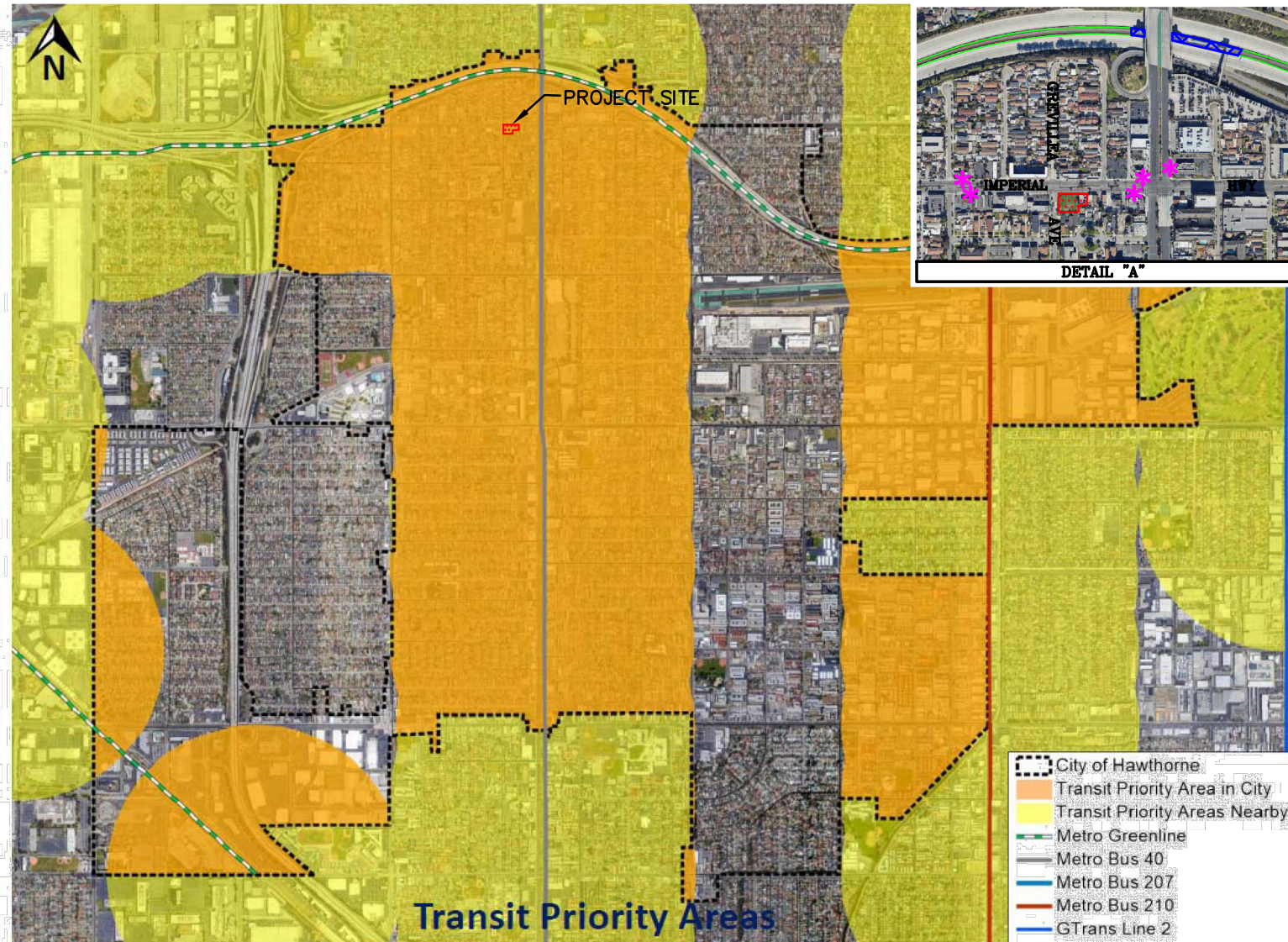
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SOURCE: ARCHITECTS ORANGE



FIGURE 3

PROPOSED SITE PLAN
GREVILLEA HOTEL, HAWTHORNE



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SOURCE: CITY OF HAWTHORNE VMT GUIDELINES, APPENDIX C, PAGE 23







- KEY**
-  = HAWTHORNE TRANSIT STOP
 -  = PROJECT SITE
 -  = METRO GREENLINE
 -  = METRO C (GREENLINE) STATION

FIGURE 4

HAWTHORNE TRANSIT PRIORITY AREAS
GREVILLEA HOTEL, HAWTHORNE



TABLE 1
PROJECT TRAFFIC GENERATION RATES AND FORECAST¹²

ITE Land Use Code / Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
<u>Trip Generation Factors:</u>							
▪ 310: Hotel (TE/Room)	7.99	56%	44%	0.46	51%	49%	0.59
<u>Project Trip Generation Forecast:</u>							
▪ Grevillea Hotel (78 Rooms)	623	20	16	36	23	23	46

Notes:

- TE/Room = Trip Ends per Room

¹² Source: *Trip Generation*, 11th Edition, Institute of Transportation Engineers (ITE), Washington, D.C. (2021). Average rates used.

ATTACHMENT A
SCAG DATA/MAP BOOK FOR
CITY OF HAWTHORNE



Connect SoCal : The 2020-2045 Regional Transportation Plan/
Sustainable Communities Strategy

LOCAL INPUT & ENVISIONING PROCESS

DATA/MAP BOOK



for the City of










HAWTHORNE

DRAFT | NOVEMBER 2019

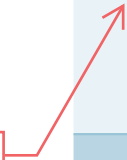


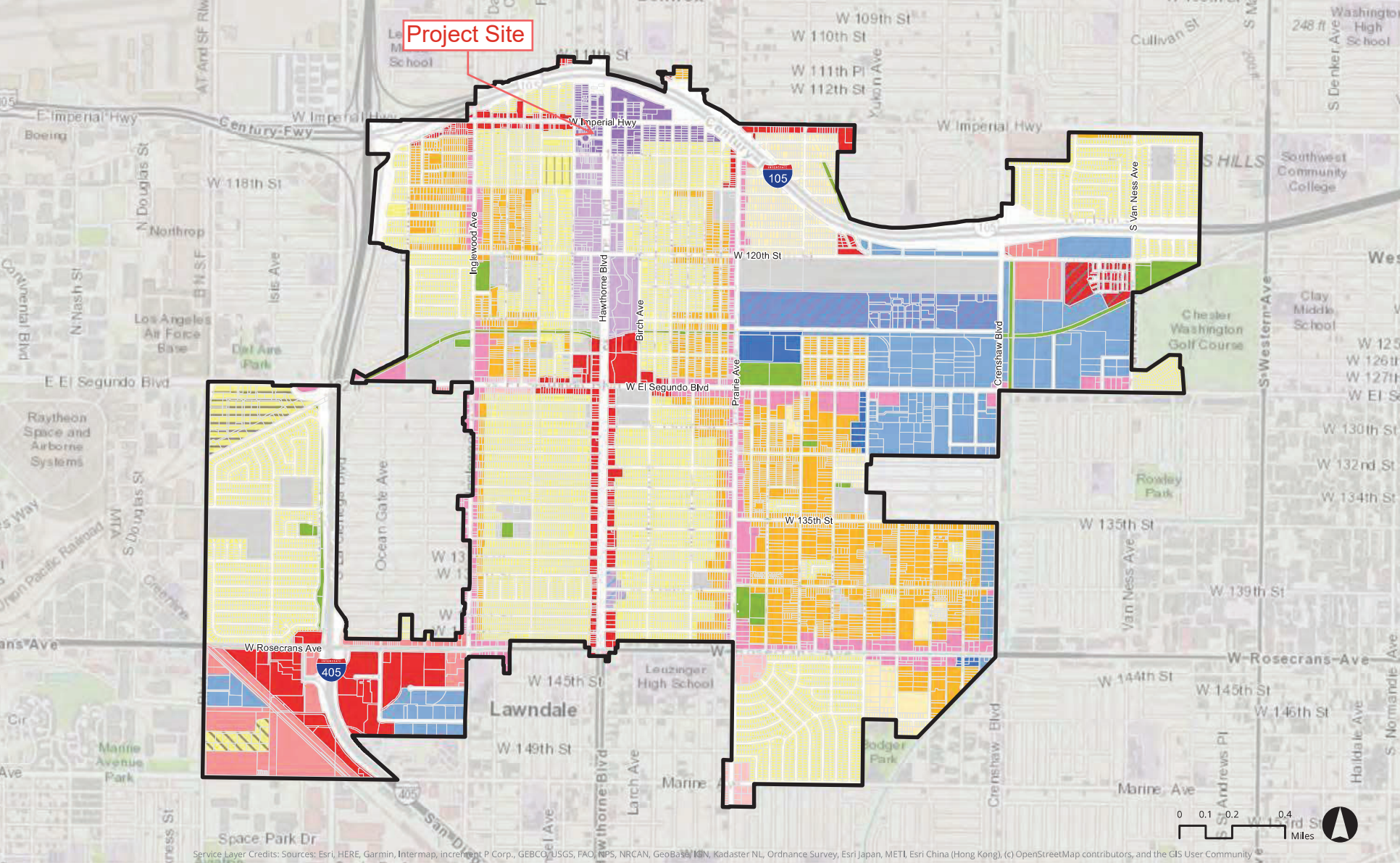
LAND USE

TABLE 1: 2016 SCAG Land Use Codes – Legend

LEGEND	LAND USE DESCRIPTION
 Single Family Residential	1110 Single Family Residential 1111 High Density Single Family Residential (9 or more DUs/ac) 1112 Medium Density Single Family Residential (3-8 DUs/ac) 1113 Low Density Single Family Residential (2 or less DUs/ac)
 Multi-Family Residential	1120 Multi-Family Residential 1121 Mixed Multi-Family Residential 1122 Duplexes, Triplexes and 2- or 3-Unit Condominiums and Townhouses 1123 Low-Rise Apartments, Condominiums, and Townhouses 1124 Medium-Rise Apartments and Condominiums 1125 High-Rise Apartments and Condominiums
 Mobile Homes and Trailer Parks	1130 Mobile Homes and Trailer Parks 1131 Trailer Parks and Mobile Home Courts, High-Density 1132 Mobile Home Courts and Subdivisions, Low-Density
 Mixed Residential	1140 Mixed Residential
 Rural Residential	1100 Residential 1150 Rural Residential
 General Office	1210 General Office Use 1211 Low- and Medium-Rise Major Office Use 1212 High-Rise Major Office Use 1213 Skyscrapers
 Commercial and Services	1200 Commercial and Services 1220 Retail Stores and Commercial Services 1221 Regional Shopping Center 1222 Retail Centers (Non-Strip With Contiguous Interconnected Off-Street Parking) 1223 Retail Strip Development 1230 Other Commercial 1231 Commercial Storage 1232 Commercial Recreation 1233 Hotels and Motels
 Facilities	1240 Public Facilities 1241 Government Offices 1242 Police and Sheriff Stations 1243 Fire Stations 1244 Major Medical Health Care Facilities 1245 Religious Facilities 1246 Other Public Facilities 1247 Public Parking Facilities 1250 Special Use Facilities 1251 Correctional Facilities 1252 Special Care Facilities 1253 Other Special Use Facilities
 Education	1260 Educational Institutions 1261 Pre-Schools/Day Care Centers 1262 Elementary Schools 1263 Junior or Intermediate High Schools 1264 Senior High Schools 1265 Colleges and Universities 1266 Trade Schools and Professional Training Facilities

Project Site Designation



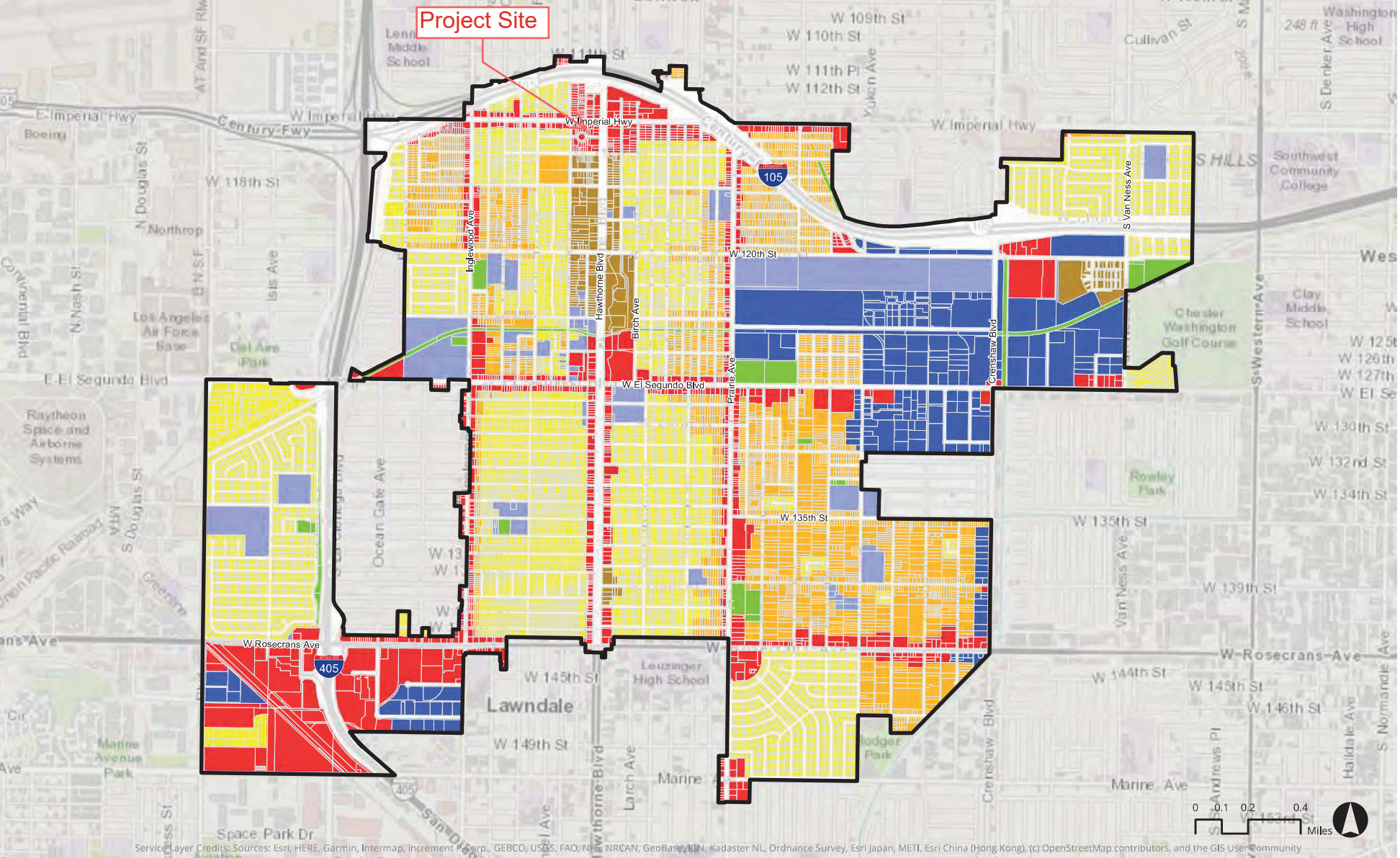


General Plan Land Use in City of Hawthorne (Local Jurisdiction's Land Use Designations)

- | | | | |
|----------------------------|------------------------------|---------------------------------------|-----------------------|
| Low Density Residential | Freeway Commercial/Mixed-Use | Public Facilities | Specific Plan - Other |
| Medium Density Residential | Mixed Commercial | Pacific Glen Specific Plan | |
| High Density Residential | Hospitality Commercial | Willow Glen Specific Plan | |
| Local Commercial | Industrial | Prestige Village Specific Plan | |
| General Commercial | General Industrial | Central Park Specific Plan | |
| Regional Commercial | Open Space | Century Business Center Specific Plan | |

Data Source: City of Hawthorne, SCAG, 2018 | Map Created: 6/5/2019

Disclaimer: The information shown on this map reflect jurisdiction's input submitted during the Local Input and Envisioning Process for the Connect SoCal. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the sources, methodologies and contents of this map, please refer to the SCAG Data/Map Book or contact RTPLocalInput@scag.ca.gov.



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General Plan Land Use in City of Hawthorne (2016 SCAG Land Use Codes)

- | | | | |
|--------------------------------|---|----------------------------------|--------------------|
| Single Family Residential | Commercial and Services | Mixed Commercial and Industrial | Specific Plan |
| Multi-Family Residential | Facilities | Mixed Residential and Commercial | Under Construction |
| Mobile Homes and Trailer Parks | Education | Open Space and Recreation | Undevelopable |
| Mixed Residential | Military Installations | Agriculture | Unknown |
| Rural Residential | Industrial | Vacant | |
| General Office | Transportation, Communications, and Utilities | Water | |

Data Source: City of Hawthorne, SCAG, 2018 | Map Created: 6/5/2019

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