

TECHNICAL MEMORANDUM

LINSCOTT
LAW &
GREENSPAN

engineers

To: Ms. Harriet Rapista
Comstock Homes

Date: August 6, 2020

From: Richard E. Barretto, P.E., Principal
Zawwar Saiyed, P.E., Senior Transportation Engineer
Linscott, Law and Greenspan, Engineers

LLG Ref: 2.20.4300.1

Subject: ***Vehicle Miles Traveled (VMT) Analysis for the
2555 190th Industrial Project, Torrance***

Engineers & Planners
Traffic
Transportation
Parking

**Linscott, Law &
Greenspan, Engineers**

2 Executive Circle
Suite 250
Irvine, CA 92614
949.825.6175 T
949.825.6173 F
www.llgengineers.com

Pasadena
Irvine
San Diego
Woodland Hills

As requested, Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit this Vehicle Miles Traveled (VMT) Analysis Technical Memorandum for the proposed 2555 190th Industrial project (herein after referred to as “Project”) in the City of Torrance, California. This Technical Memorandum presents the VMT screening criteria, analysis methodology, significance thresholds and VMT analyses. It should be noted that the approach and methodology outlined in this Technical Memorandum is generally consistent with the *Technical Advisory for Evaluating Transportation Impacts In CEQA*, published by the Governor’s Office of Planning and Research (OPR), December 2018 (OPR Technical Advisory), which provides additional detail on the language and analysis procedures described in this Technical Memorandum.

The Project site is located at 2555 W. 190th Street in the City of Torrance, California. It is bounded by Crenshaw Boulevard/Crenshaw Place to the west and by W. 190th Street to the south. The Project site currently developed with an existing 160,000 SF office building that is currently vacant and has not been actively marketed pending the redevelopment of the subject property as proposed by the Project, in addition to excess surface parking areas.

The following sections of this Technical Memorandum provide a brief history of Senate Bill 743 (SB 743), summarize the Project description, present OPRs VMT screening criteria, analysis methodology and thresholds, Project VMT and cumulative VMT.

HISTORY OF SENATE BILL 743 (SB 743)

On September 27, 2013, Governor Jerry Brown signed Senate Bill 743 (SB 743). SB 743 created a process to change the way analysis of transportation impacts under the California Environmental Quality Act (CEQA) is conducted. The Governor’s Office of Planning and Research (OPR) was tasked to amend the CEQA Guidelines to provide an alternative to the traditional metric of automobile delay which would promote three statutory goals: 1) the reduction of greenhouse gas (GHG) emissions; 2) the development of multimodal transportation networks; and 3) a diversity of land uses. OPR concluded that the use of Vehicle Miles Traveled (VMT), with thresholds

Philip M. Linscott, PE (1924-2000)
William A. Law, PE (1921-2018)
Jack M. Greenspan, PE (Ret.)
Paul W. Wilkinson, PE (Ret.)
John P. Keating, PE
David S. Shender, PE
John A. Boarman, PE
Clare M. Look-Jaeger, PE
Richard E. Barretto, PE
Keil D. Maberry, PE
Walter B. Musial, PE
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linked to GHG reduction targets, would adequately analyze a project's transportation impacts while supporting all three statutory goals.

OPR released a preliminary evaluation of alternative methods for transportation analysis in December 2013, and by August 2014, released a preliminary discussion draft of potential updates to the CEQA Guidelines, which specified VMT as the selected metric for analysis. In 2016, OPR released a draft of the proposed revisions to the CEQA Guidelines. At the same time, OPR released a new *Technical Advisory for Evaluating Transportation Impacts In CEQA*, which provides technical recommendations regarding the implementation of VMT analysis state-wide in a document external to the CEQA statute.

After extensive stakeholder outreach, OPR transmitted the final proposed revisions to the CEQA Guidelines and the current draft of the *Technical Advisory* to the California Natural Resources Agency (the body responsible for certifying, adopting, and amending the CEQA Guidelines) in November 2017. Beginning in January 2018, the California Natural Resources Agency initiated the formal rulemaking process to adopt the proposed revisions, including the new Section 15064.3 which specifies VMT as the metric for transportation analysis. On December 28, 2018, the California Office of Administrative Law filed the revised CEQA Guidelines with the Secretary of the State on behalf of the Natural Resources Agency, thereby formally implementing vehicle miles traveled as the metric for transportation analysis under CEQA. Pursuant to the adopted Section 15064.3, a lead agency may elect to implement the new criteria for analyzing transportation impacts immediately. Beginning on July 1, 2020, the criteria must be applied state-wide.

PROJECT DESCRIPTION

The Project site is located at 2555 W. 190th Street in the City of Torrance, California. It is bounded by Crenshaw Boulevard/Crenshaw Place to the west and by W. 190th Street to the south. The Project site currently developed with an existing 160,000 SF office building that is currently vacant and has not been actively marketed pending the redevelopment of the subject property as proposed by the Project, in addition to excess surface parking areas. *Figure 1* presents a vicinity map for the proposed Project. *Figure 2* displays the existing site aerial of current site layout and access locations.

Vehicular access to the Project site will be provided via the existing unsignalized full access driveway (Project Driveway 1) and signalized full access driveway (Project Driveway 2) located along W. 190th Street, a third unsignalized full access "gated access" driveway on Crenshaw Place (Project Driveway 3), and a fourth unsignalized driveway located on Crenshaw Place (Project Driveway 4) in close proximity to Crenshaw Boulevard. As part of the proposed Project's design features, an exclusive

westbound right-turn lane will be constructed at the intersection of Crenshaw Place at 190th Street in order to help facilitate truck access to/from the site.

Project Land Use Mix

The table below presents the development summary for the existing and proposed uses of the Project. Review of this table indicates that the proposed Project includes development of a state-of-the-art warehouse/cross dock industrial warehouse with 305,550 square-foot (SF) of floor area consisting of 86,780 SF of warehouse, 198,400 SF of manufacturing, and 20,370 SF of office, inclusive of 14,550 SF of mezzanine space. The Project would require demolition of the existing 160,000 SF office building. **Figure 3** illustrates the conceptual site plan for the Project prepared by Ware Malcomb. The Project is expected to be constructed by Year 2022.

Land Use / Project Description	Existing Development – Square-Footage (SF)	Proposed Project Development – Square-Footage (SF)
<i>Office / Warehouse / Manufacturing Floor Area Allocation</i>		
<input type="checkbox"/> Office	160,000 SF	20,370 SF
<input type="checkbox"/> Warehouse	--	86,780 SF
<input type="checkbox"/> Manufacturing	---	198,400 SF
Total Building Floor Area	160,000 SF	305,550 SF

PROJECT SCREENING CRITERIA

Under the VMT methodology, screening is used to determine if a project will be required to conduct a detailed VMT analysis. Since the City of Torrance currently doesn't have adopted VMT screening criteria, the following section discusses the various screening methods recommended by the State of California in the *OPR Technical Advisory* and whether the Project will screen-out, either in its entirety, or partially based on individual land uses.

Proximity to Transit Facilities

As noted previously, the CEQA Guidelines were amended to include section 15064.3, "Determining the Significance of Transportation Impacts". Subsection (b)(1) states in part:

"Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact."

Pursuant to the statute, development projects may be screened out of VMT analysis based on proximity to certain transit facilities due to the presumption of less than

significant impacts. The *Technical Advisory* reiterates this screening criteria, but also highlights certain project-specific or location-specific characteristics which may indicate the project will still generate “significant levels of VMT”, even when located within one-half mile of a major transit stop or a stop along a high-quality transit corridor. These characteristics relate to the project’s floor area ratio (FAR), parking supply, and number of dwelling units, as well as consistency with the applicable Sustainable Communities Strategy (SCS). If the project has any characteristics which indicate that the presumption of less than significant impacts as stated in the CEQA Guidelines may not be appropriate, the *OPR Technical Advisory* recommends that the project should not be screened out of further VMT analysis.

Based on the above, the proposed Project will not screen-out since it is not within one-half mile of neither an existing major transit stop¹ nor a stop along an existing high-quality transit corridor².

Small Projects

The *OPR Technical Advisory* recommends that VMT analyses be conducted for projects which are forecast to generate 110 or more average daily trips (ADT). The CEQA Guidelines provide a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet³. OPR states that “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.” OPR thus reasons that projects which are forecast to generate fewer than 110 daily trips would be comparable to categorically exempt projects and could be presumed to cause less than significant impacts.

Based on the above, the proposed Project will not screen-out since it generates more than 110 daily trips.

Map-Based Screening

An additional screening methodology is provided for residential and office land use projects. Lead agencies may prepare maps based on a regional travel demand model or travel survey data to illustrate areas that are currently below the selected VMT

¹ *Public Resources Code Section 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.”

² *Public Resources Code Section 21155*: “For purposes of this section, 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.”

³ CEQA Guidelines Section 15301, Subsection (e)(2).

threshold. OPR reasons that if a project has similar characteristics to the existing area (i.e., density, mix of uses, transit service, etc.), it will tend to exhibit similar VMT. Therefore, if a project is fully located within an area identified as having a below-threshold VMT, it may be presumed to also have less than significant VMT impacts and be screened out from requiring a detailed VMT analysis.

Based on the above, the proposed Project will not screen-out since no map-based screening is available.

Additional Screening Considerations

OPR provides additional recommendations on when the presumption of less than significant impacts may be appropriate, in addition to the formally recommended screening criteria described above. For instance, in the discussion regarding retail projects, the *OPR Technical Advisory* advises lead agencies that because local serving retail projects tend to improve retail destination proximity, shorten trips, and reduce VMT, they may be presumed to have less than significant impacts. Agencies may choose to define what constitutes local serving retail in their jurisdiction, although OPR suggests a threshold size of 50,000 square feet or less. Thus, lead agencies may choose to screen out projects based on the type and size of the land use(s) being proposed.

Further, OPR states that mixed-use projects should analyze each land use individually.

Based on the above, the proposed Project will not screen-out, thus requiring a full VMT analysis as presented in this Technical Memorandum.

Additionally, the *OPR Technical Advisory* cites research that could support the presumption of less than significant impacts for 100% affordable housing projects, on the basis that low-wage workers are more likely to choose housing close to their workplaces, thus reducing commute distances and VMT.

Based on the above, the proposed Project will not screen-out since it is not a 100% affordable housing project.

Flow Chart 1 presents the recommended screening criteria, as discussed above, for land use projects consistent with the *OPR Technical Advisory*. It should be noted that a land use project only needs to satisfy one of the screening criteria of the flow chart to qualify for screening.

VEHICLE MILES TRAVELED (VMT) ANALYSIS METHODOLOGY

According to OPR, Projects that do not screen out based on the aforementioned criteria shall complete a full VMT analysis. In the absence of the City of Torrance VMT guidelines, the VMT analysis methodology as provided by OPR has been utilized. The following summary of the guidelines has been prepared based on a review of the revisions to the CEQA Guidelines and OPR's current *Technical Advisory*.

It should be noted that according to OPR, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Here, the term "automobile" refers to on-road passenger vehicles, specifically cars, and light trucks. The primary reason being, as mentioned previously, is to align with the State's three statutory goals; (1) reduction of GHG emissions; (2) development of multi-modal networks; and (3) a diversity of land uses.

OPR's Guidance on Methodology for Office Projects

According to OPR, tour-based and trip-based approaches offer the most viable methods for determining VMT from office projects and for comparing those results to VMT thresholds. These approaches also offer the simplest methodology for determining VMT reductions from mitigation measures for office projects.

Based on the above, a full VMT analysis utilizing the Southern California Association of Governments Regional Travel Demand Model (SCAG RTDM) has been used to determine the VMT for the Project and for the City of Torrance average and will provide the following:

- **Employment-based average VMT per Employee** for office land uses.

Further, since the SCAG RTDM base year will not be consistent with the Project horizon year, linear interpolation between the SCAG RTDM base year and future year will be conducted to determine the Project horizon year VMT and the VMT for the City for the above listed category.

Finally, the Project average VMT will then be compared to the City of Torrance average to determine whether or not the Project will have a significant impact based on the significance thresholds defined in this Technical Memorandum.

OPR's Guidance on Methodology for Cumulative Impacts

OPR states that a Project's cumulative impacts are based on a determination of whether the "incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." When using an absolute VMT metric, i.e., total VMT, analyzing the combined impacts for a cumulative impacts

analysis may be appropriate. A project that falls below the threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the Project impact. Accordingly, a less than significant Project impact would imply a less than significant cumulative impact, and vice versa.

VEHICLE MILES TRAVELED (VMT) SIGNIFICANCE THRESHOLDS

As previously discussed, a project that meets the screening criteria will require preparation of a detailed transportation analysis. The project VMT will be evaluated in order to determine if the project is expected to cause a significant transportation impact. Under the VMT methodology, a transportation impact is considered significant if the project-related VMT is equal to or exceeds the thresholds.

Mitigation of project transportation impacts is required whenever VMT generated by the proposed development causes an increase of the analyzed VMT by an amount greater than the predetermined significance thresholds.

The following section discusses the VMT impact thresholds recommended by the State for office projects.

OPR's Guidance on Thresholds for Office Projects

Public Resources Code Section 21099 provides the criteria for determining the significance of transportation impacts. There are three statutory goals that the significance criteria must promote: (1) reduction of GHG emissions; (2) development of multi-modal networks; and (3) a diversity of land uses. The *OPR Technical Advisory* provides OPR's recommendations for quantitative thresholds of significance, which align with the State's three statutory goals. The recommended significance thresholds were developed from legislative mandates and state policies (i.e., AB 32, SB 375, SB 391 and a number of Executive Orders) that established quantitative GHG emissions reduction targets.

The *OPR Technical Advisory* states that a fifteen percent (15%) reduction in VMT is achievable for development projects in a variety of place types and is consistent with SB 743's direction to OPR to select a threshold that aligns with the State's three statutory goals.

For office projects, the existing VMT per employee may be measured from the regional average. However, if a region is substantially larger than the geography over which most workers would be expected to live, a smaller geography to develop significance thresholds may be utilized, which in this case is the City of Torrance.

Further, the *OPR Technical Advisory* applies the thresholds for office projects to either tour-based VMT or home-based (i.e., trip-based) VMT assessments. The metric

used to determine project VMT and the city-wide or regional VMT must be consistent (i.e., “apples to apples” comparison).

It should be noted that the *OPR Technical Advisory* provides recommendations for thresholds of significance for only three types of development, focusing only on the project types which tend to have the greatest effect on VMT. The *OPR Technical Advisory* does not provide recommendations on thresholds for other kinds of development projects. The three main development project types, residential, office, and retail may be considered proxies for developments which exhibit certain trip/travel characteristics as shown below:

- “Residential” may be considered a proxy for a development which generates new trips.
- “Office” may be considered a proxy for a development which generates primarily work trips.
- “Retail” may be considered a proxy for a development which primarily attracts already existing trips, leading to a diversion of trips rather than generating new trips.

If a project can be demonstrated to match one of these proxy categories, the applicable thresholds may be utilized. Thus, the proposed Project office, manufacturing and warehousing components are expected to generate primarily work trips and have been analyzed under the Office thresholds as listed below:

- A proposed Office project exceeding a level of 15% below existing regional (in this case City of Torrance) VMT per employee may indicate a significant transportation impact.

VEHICLE MILES TRAVELED (VMT) ANALYSIS

Summarized below are the average VMT/Employee values utilizing SCAG RTDM for the City of Torrance and for the Project. It should be noted that the Project is located in Traffic Analysis Zone (TAZ) 21197100 and the Project development totals were converted into Socio-Economic Data (SED) and inputted into the SCAG RTDM.

City Average VMT/Employee

The City Average VMT/Employee are listed below:

- Year 2012 Average VMT/Employee = 14.23
- Year 2040 Average VMT/Employee = 11.85
- **Year 2022 Average VMT/Employee = 13.38**

Project Average VMT/Employee

The Project Average VMT/Employee is listed below:

- Year 2012 Average VMT/Employee = 9.47
- Year 2040 Average VMT/Employee = 8.50
- **Year 2022 Average VMT/Employee = 9.12**

Project Significant VMT Impact

As shown above and based on the criteria outlined in this report, the proposed Project does not exceed a level of 15% below existing City of Torrance VMT/Employee and thus does not have a significant transportation impact.

Cumulative Significant VMT Impact

As previously mentioned and according to the *OPR Technical Advisory*, a less than significant Project impact would imply a less than significant cumulative impact.

CONCLUSION

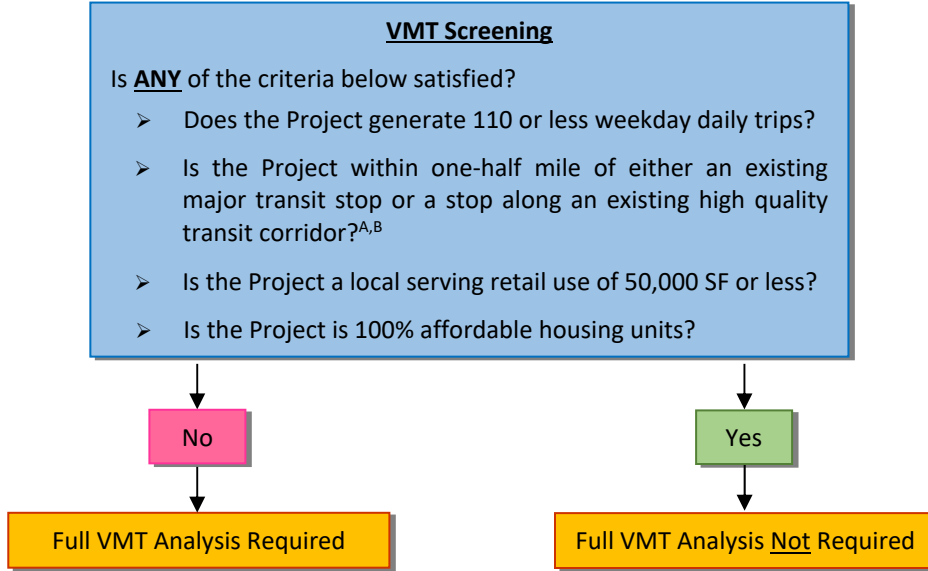
Consistent with the *OPR Technical Advisory* and based on the VMT methodology, criteria, guidelines, thresholds and results outlined in this Technical Memorandum, the proposed Project will not have a significant Project VMT impact nor a significant cumulative impact.

* * * * *

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

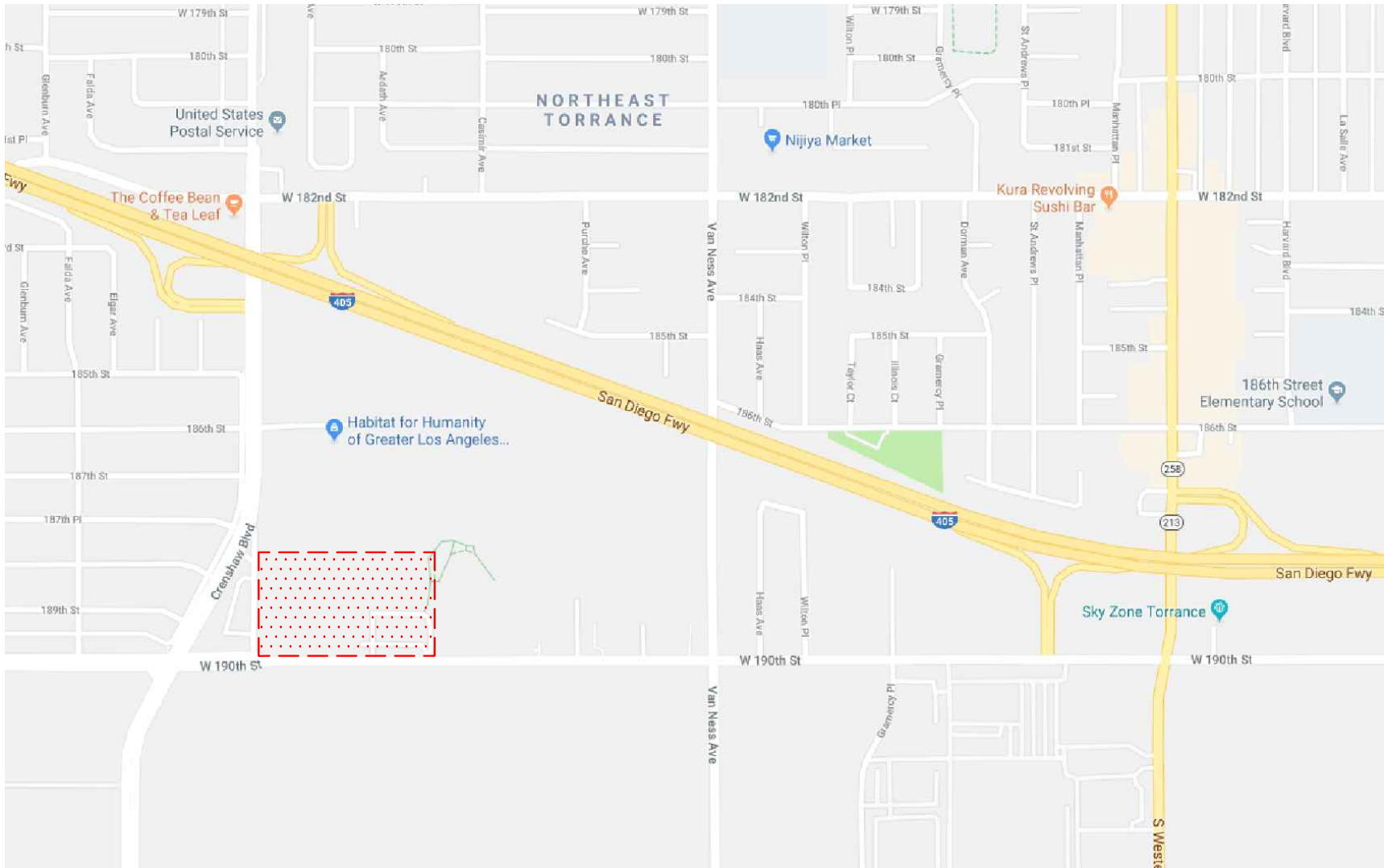
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FLOW CHART 1
VMT SCREENING CRITERIA FLOW CHART

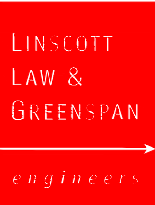


Notes:

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



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SOURCE: GOOGLE

KEY

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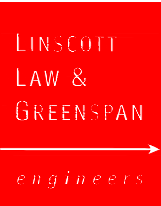
FIGURE 1

VICINITY MAP

2555 190TH INDUSTRIAL PROJECT, TORRANCE



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NO SCALE

SOURCE: GOOGLE

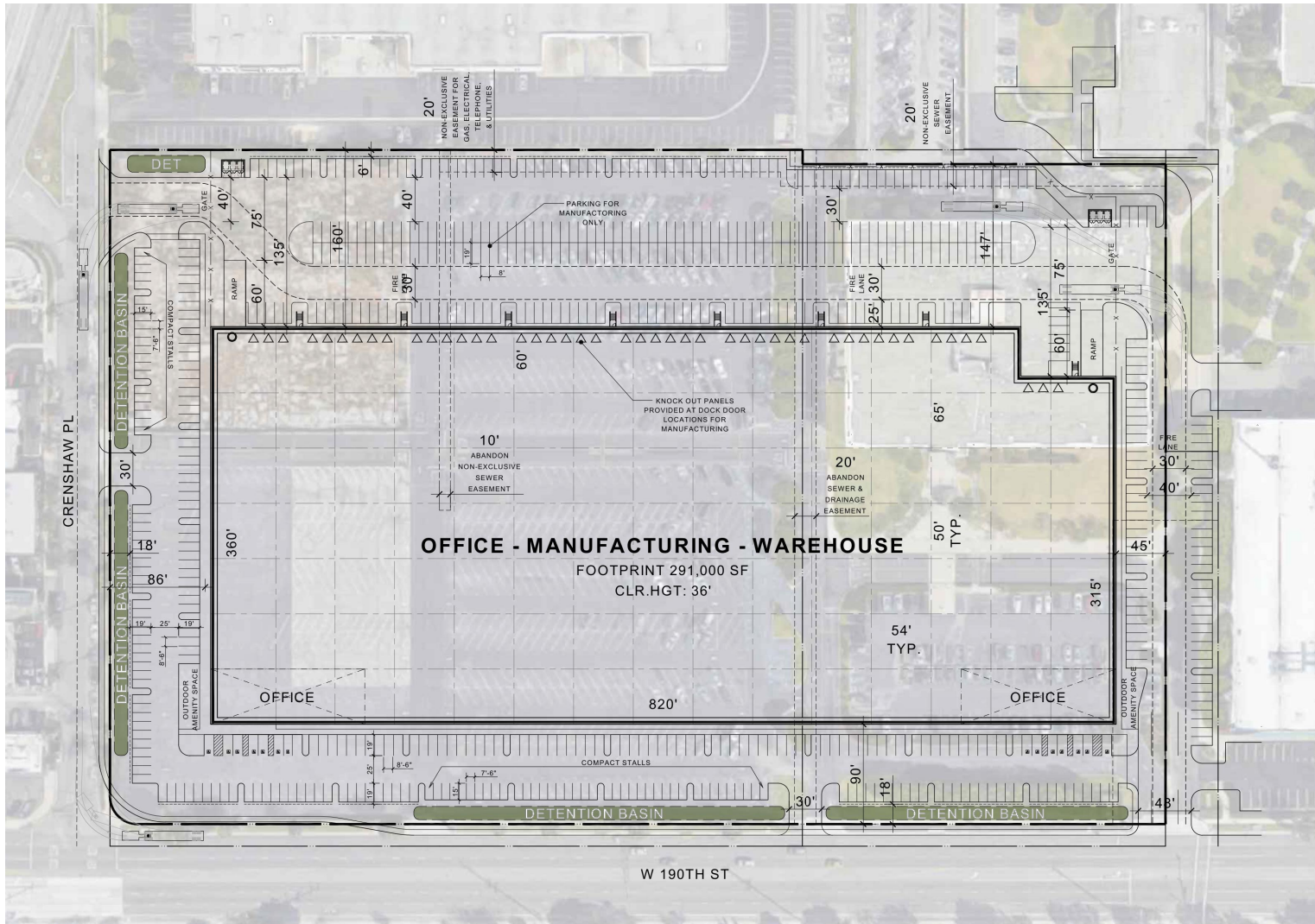
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FIGURE 2

EXISTING SITE PLAN

2555 190TH INDUSTRIAL PROJECT, TORRANCE



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SOURCE: WARE MALCOMB

FIGURE 3

PROPOSED SITE PLAN

2555 190TH INDUSTRIAL PROJECT, TORRANCE



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