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TECHNICAL MEMORANDUM

To: Shin Furukawa, City Engineer
Jessamine Que, Associate Engineer
City of Torrance, Public Works Department

Date: January 27, 2025

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

LLG Ref: 2.19.4123.1

Subject: ***Vehicle Miles Traveled (VMT) Analysis for the
2555 W. 190th Warehouse Development, Torrance***

As requested, Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit this Vehicle Miles Traveled (VMT) Analysis Technical Memorandum for the proposed 2555 W. 190th Warehouse Development Project (herein after referred to as “Project”) in the City of Torrance, Los Angeles County, California. This Technical Memorandum presents the VMT screening criteria and it should be noted that the criteria, approach and methodology outlined in this Technical Memorandum is consistent with the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)*, which provides additional detail on the language and analysis procedures described in this Technical Memorandum.

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

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. Upon initiation of this Project the site was developed with an existing 160,000 SF office building which has recently been demolished and now the subject property exists as a vacant parcel of land. **Figure 1** presents a vicinity map that illustrates the general location of the Project site and surrounding street system. **Figure 2** displays the existing site aerial of the current site layout.

Table 1 presents the development summary for the existing and proposed uses of the Project. Review of **Table 1** indicates that the proposed Project includes development of a state-of-the-art warehouse/industrial/manufacturing facility with a building footprint of 291,000 SF and a mezzanine of 14,550 SF for a total floor area of 305,550 SF. The project as it was originally proposed consisted of 86,780 SF of



warehouse, 198,400 SF of manufacturing, and 20,370 SF of office. *Figure 3¹* presents the Project site plan for Project, prepared by Ware Malcomb.

The Project site plan indicates that vehicular access will be maintained at the two (2) existing unsignalized full access driveway on 190th Street, and the signalized intersection of 190th Street at Honeywell, as well as the existing unsignalized full access driveway on Crenshaw Place. A fifth unsignalized driveway, to be located on Crenshaw Place in close proximity to Crenshaw Boulevard, is proposed and will serve as the primary access for the Project’s truck-related traffic.

It should be noted that the proposed Project development plan has evolved over the years to address City staff comments and market conditions. The Project as currently proposed includes the development of a state-of-the-art warehouse/industrial/manufacturing facility with a building footprint of 253,470 SF building with a 9,500 SF mezzanine consisting of 78,891 SF of warehouse, 157,782 SF of manufacturing, and 26,297 SF of office, inclusive of 9,500 SF of mezzanine space. The mix between warehousing/manufacturing/office of the Project as now proposed are similar to that of the 305,550 SF facility. As such, conservatively this report has assessed the more intense use (305,550 SF) which also would result in a greater number of employees for which the Project’s VMT is calculated. Below presents a comparison between the Original Project that was assessed and what is now proposed (Current Project).

Land Use	Original Project	Current Project	Project Change
<u>Building Area</u>			
Footprint	291,000 SF	253,470 SF	-37,530 SF
Mezzanine	14,550 SF	9,500 SF	-5,050 SF
Total Building Area	305,550 SF	262,970 SF	-42,580 SF
<u>Building Use</u>			
Warehouse	86,780 SF	78,891 SF	-7,889 SF
Manufacturing	198,400 SF	157,782 SF	-40,618 SF
Office (inclusive of Mezzanine)	20,370 SF	26,297 SF	+5,927 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. The following section discusses the various screening methods recommended by the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)*, as well as direction by City of Torrance staff, and whether the Project will screen-out, either in its entirety, or partially based on individual land uses.

¹ The site plan provided in this report was prepared by Ware Malcomb dated 12-16-24, and depicts the current footprint of the proposed development, which includes a total of 262,970 SF. However, this analysis is based on a previous iteration of the site plan which provides a conservative assessment.



It should be noted that the Project is located in Traffic Analysis Zone (TAZ) 21197100 of the Southern California Association of Governments Regional Travel Demand Model (SCAG RTDM). **Figure 4** presents the TAZ Map from SCAG RTDM (*Figure 3 – SCAG RTDM Tier-2 TAZs Source: SCAG RTDM*), Page 5, *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)*).

The criteria below present the various screening methods recommended by the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)* to determine if the Project will screen out. It is noted that development projects that have one or more of the following attributes is sufficient to screen the project out of further evaluation and therefore may be presumed to create a less than significant impact with respect to VMT.

Small Projects

The *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)* presents:

- *Criteria: Will the Project generate a net increase of 110 or less daily trips?*

Table 2 presents the trip rates/equations used to forecast trips. **Tables 3** presents the project trips. As presented in *Table 3*, the proposed Project would result in 1,652 daily trips.

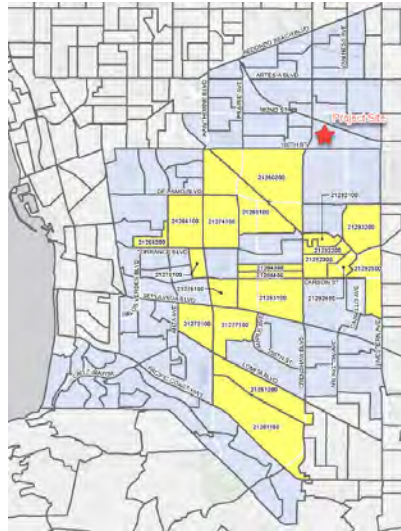
*Based on the above, the Project **will not** screen-out since it generates more than 110 net daily trips.*

Map-Based Screening for Residential and Office Projects

Based on the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)*, the residential and office projects located 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.

- *Criteria: Is the Project a residential project in a low VMT per capita area or an office project in a low VMT per employee area?*

*Based on the above, the proposed Project **will not** screen-out since it is not located in a low VMT area as presented in the **Screenshot 1** (*Figure 8 – TAZs with Low (85% or less than 2021 LA County Average) VMT per Capita*, Page 13, *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)*).*



Screenshot 1. TAZs with Low (85% or less than 2021 LA County Average) VMT per Capita²

Proximity to Transit Screening

The *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects* (dated January 2021) states:

- *Criteria: Is the Project located within one-half mile of either an existing major transit stop or an existing stop along an existing high quality transit corridor?*

Further, The *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects* (dated January 2021) states:

“This transit-based screening criteria cannot be utilized if a project has at least one of the following limiting factors:

- 1. Has a Floor Area Ratio (FAR) of less than 0.75;*
- 2. Includes more parking for use by residents, customers, or employees of the project than required by the City;*
- 3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City of Brea, with input from the Southern California Association of Governments [SCAG]); or*
- 4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.”*

Transit Priority Area (TPA) Assessment

“Major transit stop” means a site containing an existing rail or bus rapid transit station; a ferry terminal served by either a bus or rail transit service; or the

² *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects* (dated January 2021)



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 means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

The City provided a Transit Priority Area (TPA) map illustrating a one-half mile radius from existing transit stops and stops along high quality transit corridors. **Screenshot 2** (Figure 10 - Transit Priority Area Map, Page 16, City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)) displays the Project TAZ within the TPA map. As presented in this figure, the proposed Project site **is not** located within a TPA.



Screenshot 2. Transit Priority Area Map³

³ City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)



Affordable Housing Assessment

The proposed Project does not replace affordable residential units with a smaller number of moderate or high-income residential units since all the replacement uses are non-residential.

*Based on the above, the proposed Project **will not** screen-out since it is not a residential project.*

Affordable Residential Development Screening

The *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)* states:

- *Criteria: Is the Project 100% affordable housing units?*

*Based on the above, the proposed Project **will not** screen-out since the proposed Project is not a residential project.*

Local-Serving Retail Screening

The *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)* states:

- *Criteria: Does the Project contain a retail use of 50,000 SF or less?*

*Based on the above, the proposed Project **will not** screen-out since the proposed Project is not local-serving retail project.*

Local-Serving Public Facility

The *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)* states:

- *Criteria: Is the Project a locally serving public facility?*

*Based on the above, the proposed Project **will not** screen-out since the proposed Project is not local-serving public facility.*

Given the findings of the “Screening Assessment”, a detailed VMT Analysis for the proposed Project has been prepared per the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)*.

VEHICLE MILES TRAVELED (VMT) ANALYSIS METHODOLOGY

As required by the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)*, projects that do not screen-out through the steps above shall complete a full VMT analysis and forecasting through the 2012 SCAG RTDM to determine if it will have a significant VMT impact. This analysis shall include both Project level impact analysis (focused on Project-generated VMT) and a



cumulative level impact analysis (focused on the Project's effect on VMT) under the four scenarios listed below:

- Base Year
- Base Year With Project
- Future Year
- Future Year With Project

Project Level Analysis

To evaluate the Project generated VMT, the Opening Year Project VMT per employee (interpolation between Base Year With Project and Future Year With Project model runs) is compared to the Los Angeles County Opening Year VMT per employee (interpolation between Base Year and Future Year model runs) threshold. The VMT values to be analyzed shall correspond to the opening year of the Project and should be linearly interpolated between the Base Year and Future Year models to establish the Project's opening year VMT and threshold.

Cumulative Analysis

To evaluate the Cumulative Analysis' Project's effect on VMT, Future Year Without Project and Future Year With Project model runs have been conducted. The Total VMT within the City of Torrance using the boundary link-level method has been utilized and the Future Year Without Project and has been compared to the Future Year With Project.

Based on the above, a full VMT analysis utilizing SCAG RTDM has been used to determine the VMT for the Project, Los Angeles County and for the City of Torrance and will provide the following:

- Project-generated VMT per Employee
- Los Angeles County Threshold VMT per Employee
- Link-level Boundary Citywide Total VMT without and with Project

VEHICLE MILES TRAVELED (VMT) IMPACT THRESHOLDS

The project VMT will be evaluated in order to determine if the project is expected to cause a significant transportation impact. The VMT significance criteria as stated in the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)* are detailed below:



Project Level Impacts

A project is considered to have a significant Project-Level VMT impact if the project VMT per employee exceeds 85% of the Los Angeles County Average VMT per employee.

Cumulative Impacts

A significant Cumulative VMT impact will occur if the project will generate a net increase in Total VMT for Future Year 2040.

VEHICLE MILES TRAVELED (VMT) ANALYSIS

Summarized below are the average VMT per Employee values utilizing SCAG RTDM for Los Angeles County 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. Further, the project employee numbers were based on the original building size from the first project submittal which corresponds to a 305,550 SF of total floor area with an equivalent of 407 employees. However, as noted in the project description, the current building floor area decreased to 262,970 SF (includes mezzanine square footage) and results in the number of employees being reduced to 356 employees. Hence, it can be concluded that the VMT analysis results summarized herein would be similar/lower for the reduced (Current) Project.

LA County VMT/Employee

The LA County Average VMT/Employee are listed below:

- Baseline Year 2012 Average VMT/Employee = 18.24
- Future Year 2040 Average VMT/Employee = 15.95
- **Opening Year 2024 Average VMT/Employee = 17.26**
- **LA County Average VMT per Employee threshold 14.67**

Project Average VMT/Employee

The Project Average VMT/Employee is listed below:

- Baseline Year 2012 Average VMT/Employee = 9.47
- Future Year 2040 Average VMT/Employee = 8.50
- **Opening Year 2024 Average VMT/Employee = 9.05**

Project Level Impacts

As shown above, the Los Angeles County Opening Year 2024 VMT per employee was calculated to be 17.26 VMT per employee, with a Los Angeles County Opening Year 2024 VMT per employee threshold of 14.67 VMT per employee.



As shown above, the Opening Year Project-generated VMT per Employee of is **38.28%** ($(14.67 - 9.05) / 14.67$) **below** the Los Angeles County threshold of 14.67 VMT per employee.

Based on the criteria outlined in this report and the table below, the Project is not expected to have a significant Project-generated VMT impact.

Project-Generated VMT per employee				
Description	Project VMT	Los Angeles County Threshold	Compared to Threshold	Significant Impact
Opening Year 2024	9.05	14.67	38.28% below	No

Cumulative Significant VMT Impact

Since the Project land use is consistent with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as contained in Southern California Association of Governments’ (SCAG) adopted Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy; adopted September 3, 2020), the preparation of a cumulative analysis is not necessary to evaluate the Project’s potential Cumulative VMT impact according to the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)*.

Attached at the end of this letter is the email from the project’s CDD Planner indicating that the Project is consistent with the 2020-2045 SCAG RTP/SCS (See **Attachment A**).

As such, in accordance with the City of Torrance’s guidelines, a less than significant Project impact would imply a less than significant cumulative impact.

CONCLUSION

Based on the Vehicle Miles Traveled (VMT) Screening Assessment and the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)*, a detailed VMT analysis was prepared for the proposed Project. Based on the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)*, and the VMT methodology, criteria, analysis, thresholds and results outlined in this Technical Memorandum, the proposed Project will not have a significant Project Level VMT impact nor a Cumulative VMT impact. Therefore, it is concluded that the proposed Project will not have a significant CEQA related transportation impact.

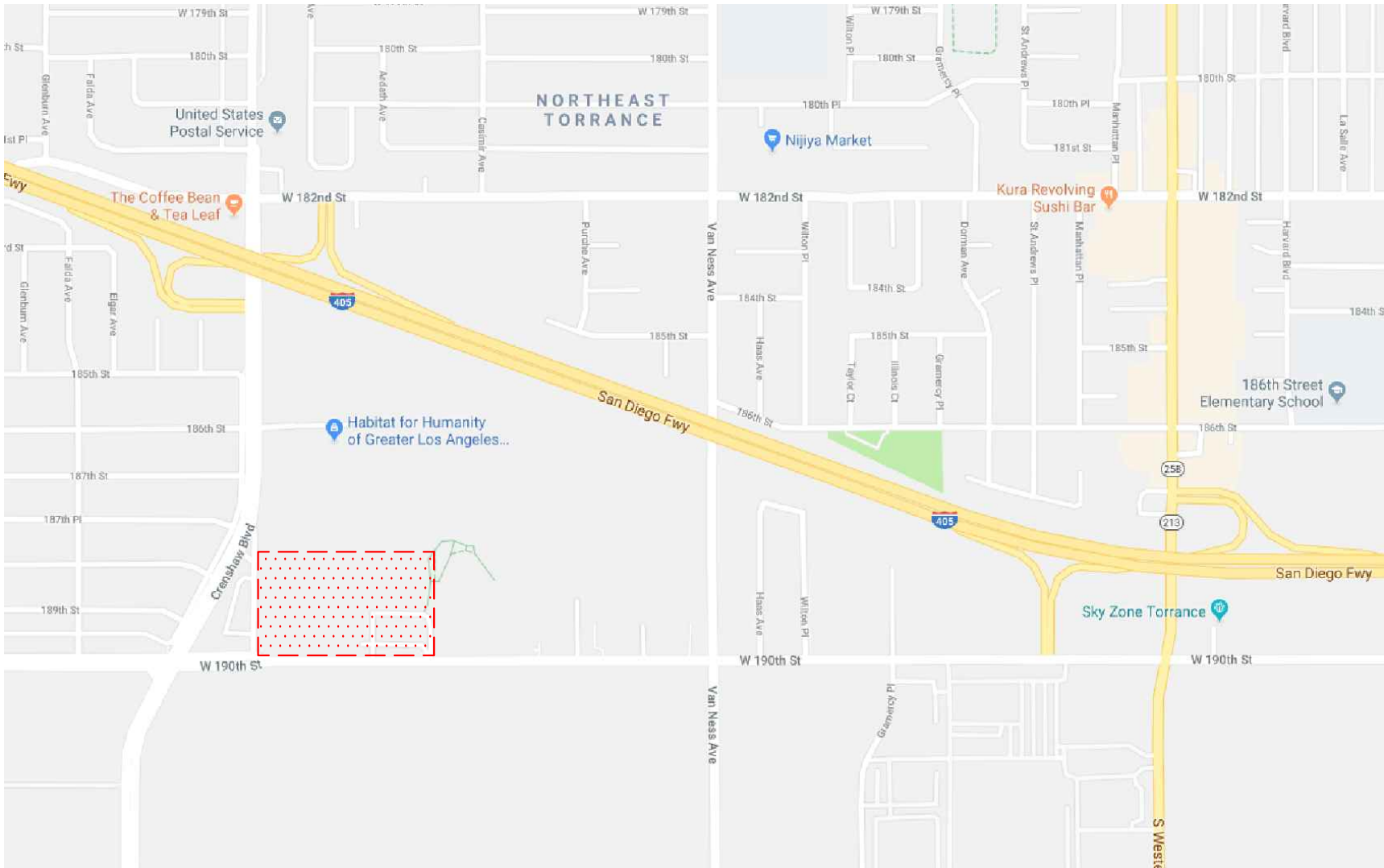
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We appreciate the opportunity to provide this Technical Memorandum. Should you have any questions regarding the memorandum, please contact us at (949) 825-6175.

cc: File





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SOURCE: GOOGLE

KEY

 = PROJECT SITE

FIGURE 1-1

VICINITY MAP

2555 W. 190TH STREET WAREHOUSE/MANUFACTURING PROJECT, TORRANCE



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SOURCE: GOOGLE

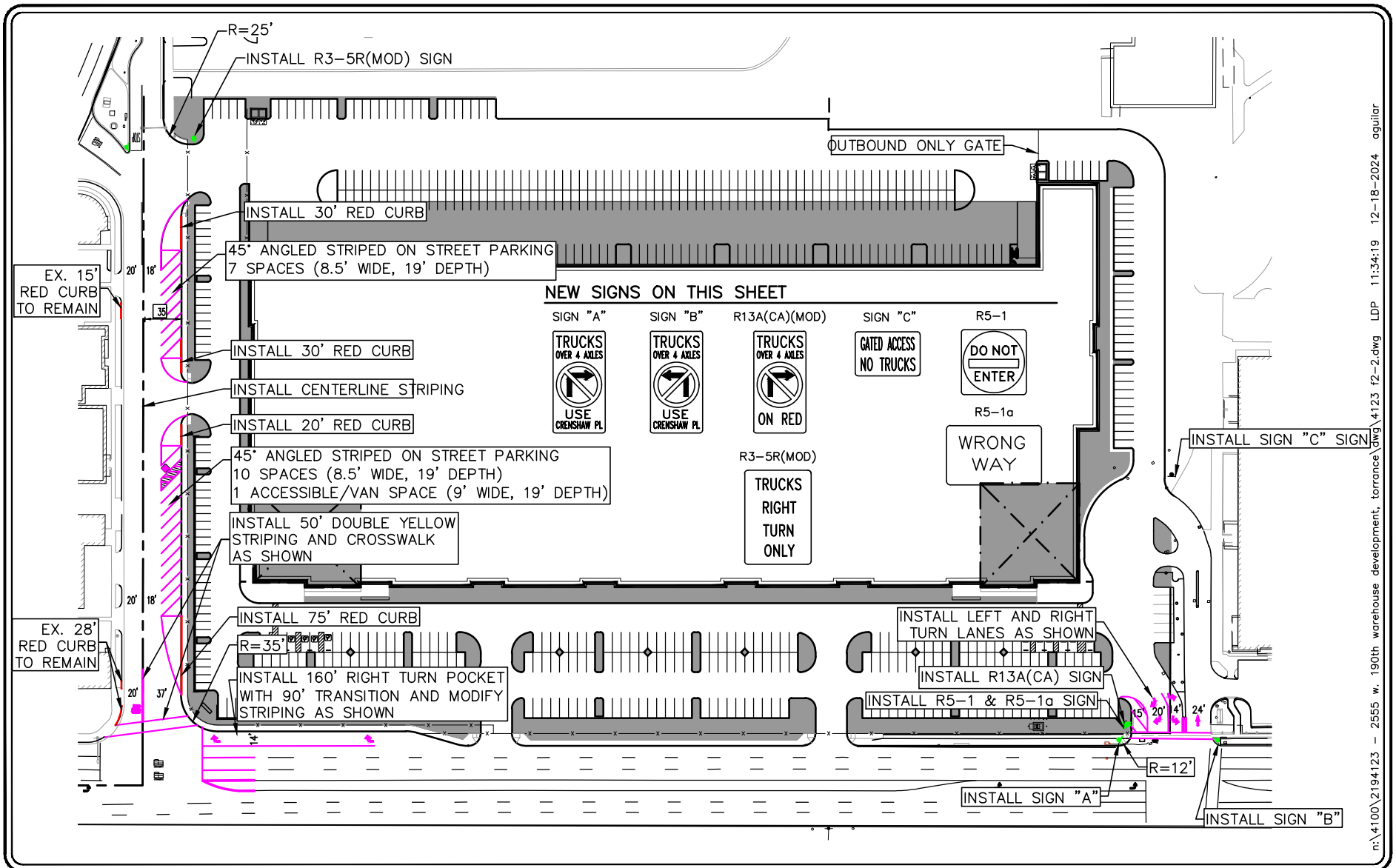
KEY

 = PROJECT SITE

FIGURE 2

EXISTING SITE PLAN

2555 W. 190TH STREET WAREHOUSE/MANUFACTURING PROJECT, TORRANCE



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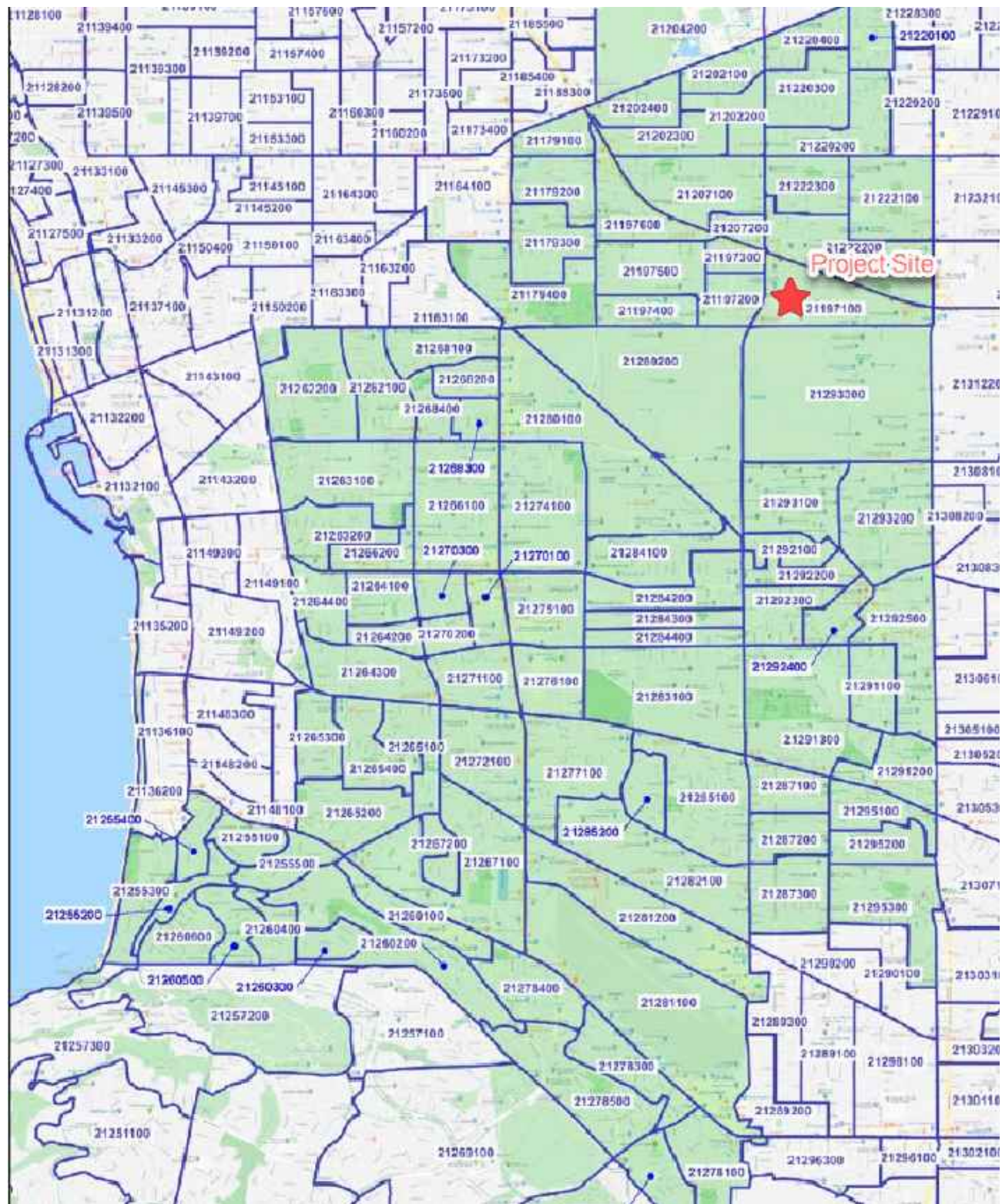
SOURCE: DRC ENGINEERING INC.

FIGURE 3



PROPOSED SITE PLAN

2555 W. 190TH STREET WAREHOUSE/MANUFACTURING PROJECT, TORRANCE



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SOURCE: SCAG RTDM

FIGURE 4



NO SCALE

TAZ MAP

2555 W. 190TH STREET WAREHOUSE/MANUFACTURING PROJECT, TORRANCE



TABLE 1
PROJECT DEVELOPMENT SUMMARY

Land Use / Project Description	Prior Development – Square-Footage (SF)	Proposed Project Development – Square-Footage (SF)
<u>Office/ Warehouse / Manufacturing Floor Area Allocation</u>		
<input type="checkbox"/> Office	160,000 SF	20,370 SF ⁴
<input type="checkbox"/> Warehouse	--	86,780 SF
<input type="checkbox"/> Manufacturing	---	198,400 SF
Total Building Floor Area	160,000 SF	305,550 SF

Notes:

- SF = square foot of development

⁴ Includes 14,550 SF of mezzanine floor area.



TABLE 2
PROJECT TRIP GENERATION RATES WITH PCE CONVERSION FACTORS⁵

ITE Land Use Code	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
<u>Trip Generation Rates:</u>							
▪ 140: Manufacturing – Total (TE/1000 SF)	4.75	0.52	0.16	0.68	0.23	0.51	0.74
❑ Passenger Cars – 79.57% Daily (TE/1000 SF)	3.78	0.37	0.12	0.49	0.15	0.33	0.48
❑ 2 Axle Trucks – 3.46% Daily/16.95% Peak Hour (TE/1000 SF)	0.16	0.03	0.00	0.03	0.01	0.03	0.04
❑ 3 Axle Trucks – 4.64% Daily/22.71% Peak Hour (TE/1000 SF)	0.22	0.03	0.01	0.04	0.02	0.04	0.06
❑ 4+ Axle Trucks – 12.33% Daily/60.34% Peak Hour (TE/1000 SF)	0.59	0.09	0.03	0.12	0.05	0.11	0.16
▪ 150: Warehousing – Total (TE/1000 SF)	1.71	0.13	0.04	0.17	0.05	0.13	0.18
❑ Passenger Cars – 79.57% Daily (TE/1000 SF)	1.36	0.09	0.03	0.12	0.03	0.09	0.12
❑ 2 Axle Trucks – 3.46% Daily/16.95% Peak Hour (TE/1000 SF)	0.06	0.01	0.00	0.01	0.00	0.01	0.01
❑ 3 Axle Trucks – 4.64% Daily/22.71% Peak Hour (TE/1000 SF)	0.08	0.01	0.00	0.01	0.00	0.01	0.01
❑ 4+ Axle Trucks – 12.33% Daily/60.34% Peak Hour (TE/1000 SF)	0.21	0.02	0.01	0.03	0.02	0.02	0.04
▪ 710: General Office Building (TE/1000 SF)	10.84	88%	12%	1.52	17%	83%	1.44

Notes:

- TE/1000 SF = Trip ends per 1,000 SF of development
- SF = Square-feet of gross floor area
- PCE = Passenger Car Equivalent

⁵ Source: *Trip Generation, 10th Edition, Institute of Transportation Engineers (ITE), Washington, D.C. (2017)*. Recommended mix of traffic, including mix of 2-axle, 3-axle, and 4+-axle trucks are based on the *Truck Trip Generation Study – City of Fontana, August 2003*. All 2-axle, 3-axle and 4+-axle trucks are converted to passenger car equivalents using a factor of 1.5 vehicles per truck, 2.0 vehicles per truck, and 3.0 vehicles per truck, respectively.



**TABLE 3
PROJECT TRIP GENERATION FORECAST⁶**

ITE Land Use Code / Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
<u>Project Trip Generation Forecast:</u>							
▪ 150: Warehousing (86,780 SF)							
<input type="checkbox"/> Passenger Cars	118	8	2	10	3	7	10
<input type="checkbox"/> 2 Axle Trucks	8	1	0	1	0	1	1
<input type="checkbox"/> 3 Axle Trucks	14	2	0	2	0	2	2
<input type="checkbox"/> 4+ Axle Trucks	<u>55</u>	<u>5</u>	<u>3</u>	<u>8</u>	<u>5</u>	<u>5</u>	<u>10</u>
Warehousing Total	195	16	5	21	8	15	23
▪ 140: Manufacturing (198,400 SF)							
<input type="checkbox"/> Passenger Cars	750	73	24	97	30	65	95
<input type="checkbox"/> 2 Axle Trucks	48	9	0	9	3	9	12
<input type="checkbox"/> 3 Axle Trucks	87	12	4	16	8	16	24
<input type="checkbox"/> 4+ Axle Trucks	<u>351</u>	<u>54</u>	<u>17</u>	<u>71</u>	<u>30</u>	<u>65</u>	<u>95</u>
Manufacturing Total	1,236	148	45	193	71	155	226
▪ 710: Office Space (20,370 SF)	221	27	4	31	5	24	29
Total Passenger Car Traffic	1,089	108	30	138	38	96	134
Total Truck PCE Traffic	<u>563</u>	<u>83</u>	<u>24</u>	<u>107</u>	<u>46</u>	<u>98</u>	<u>144</u>
Total Project Trip Generation	1,652	191	54	245	84	194	278

⁶ Source: *Trip Generation, 11th Edition, Institute of Transportation Engineers (ITE), Washington, D.C. (2021)*. Recommended mix of traffic, including mix of 2-axle, 3-axle, and 4+-axle trucks are based on the *Truck Trip Generation Study – City of Fontana, August 2003*. All 2-axle, 3-axle and 4+-axle trucks are converted to passenger car equivalents using a factor of 1.5 vehicles per truck, 2.0 vehicles per truck, and 3.0 vehicles per truck, respectively.

ATTACHMENT A
CDD PLANNER EMAIL REGARDING PROJECT
CONSISTENCY WITH 2020-2045 RTP SCS

Christy Kopulsky

From: Tiffany Sukay <tsukay@comstock-homes.com>
Sent: Tuesday, January 21, 2025 11:10 AM
To: Shane Green; Richard E. Barretto
Cc: Eric Winqvist
Subject: FW: Project Consistency with SCAG – RTP/SCS

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Shane,

Here's the email below from CDD Planning that addresses Jessa's #2 comment on the TIA to use as an Attachment.

Let me know the impact of removing the eastbound right turn lane from the report as all others seem minor. How quick can we update and re-submit?

Thanks,
Tiffany

From: Tiffany Sukay
Sent: Thursday, September 12, 2024 2:17 PM
To: Shane Green <green@llgengineers.com>
Cc: Richard E. Barretto <barretto@llgengineers.com>
Subject: FW: Project Consistency with SCAG – RTP/SCS

Hi Shane,

Please find the email below that will cover us for Item #3 on Jessa's VMT comments. If the VMT doesn't discuss/reference the current site plan, perhaps we update now and submit to check something off the list?

Thanks,
Tiffany
805.871.6500

From: Oorts, Leo <LOorts@TorranceCA.Gov>
Sent: Thursday, September 12, 2024 1:42 PM
To: Tiffany Sukay <tsukay@comstock-homes.com>
Cc: Niemeyer, Natalie <NNiemeyer@TorranceCA.Gov>
Subject: Project Consistency with SCAG – RTP/SCS

Hi Tiffany,

The purpose of this email is to provide a determination for project consistency with the 2020-2045 SCAG – RTP/SCS. When making a determination, a project is reviewed for consistency with the Torrance General Plan land use designation.

The subject project involves demolition of existing structures onsite and the construction of one industrial warehouse building measuring 262,970 square feet of building floor area, on properties that have a zoning designation of M-2 Zone

(Heavy Manufacturing District) and a land use designation of I-HVY (Heavy Industrial) located at 2555 190th Street (APN 4090-021-032 through -034) (Application No. CUP20-01003, DIV20-01003, EAS20-01001).

The subject project is consistent with the zoning designation of M-2 Zone (Heavy Manufacturing District) and the land use designation of I-HVY (Heavy Industrial). Therefore, the project is deemed consistent with the 2020-2045 SCAG – RTP/SCS.

LEO OORTS

Planning Manager - Community Development Department

310-618-5925 | LOorts@TorranceCA.Gov

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