



## TECHNICAL MEMORANDUM

**TO:** Tiffany Sukay | COMSTOCK HOMES

**FROM:** Katie Wilson, Senior Associate | GANDDINI GROUP, INC.

**DATE:** July 3, 2024

**SUBJECT:** 190th Street Warehouse Project AQ-GHG-HRA-Energy Impact Analysis Addendum (GGI Project No. 19260)

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The Air Quality, Global Climate Change, Health Risk Assessment and Energy Impact Analysis report (AQR) for the 190<sup>th</sup> Street Warehouse Project was completed on September 7, 2022. The purpose of this addendum is to address the revised project description for a reduction in the project square footage. With the revised project description (based on the latest site plan dated 6.13.2024), the warehouse use will be approximately 78,891 square feet (SF), the manufacturing use will be approximately 157,782 SF, and the office use will be approximately 26,297 SF (for a total building area of 262,970 SF), with a 572-space parking lot.

The previous (2022) AQR analyzed a larger project which had 85,239 SF of warehouse use, 170,478 SF of manufacturing use, and 28,413 SF of office use (for a total building area of 284,130 SF), with a 600-space parking lot. This AQ-GHG-HRA-Energy Impact Analysis Addendum Technical Memorandum will address the potential difference in air quality, GHG and energy-related emissions impacts due to the revised land use and revised project trip generation.

### IMPACT ANALYSIS

#### Construction Emissions and HRA-Related Emissions

The latest (smaller) version of the project will not result in any changes to the proposed construction equipment and reflects a reduction in square footage. Therefore, impacts associated with construction of the latest version of the project would not result in greater impacts than those that are associated with previously proposed project. The construction of the smaller project would not result in new or more substantial increases in AQ or GHG emissions, or construction-related diesel particulate (DPM) emissions than what was previously analyzed and disclosed in the September 2022 AQR. Furthermore, the 2022 AQR (including the HRA) utilized the latest emissions factors (CARB EMFAC2021 and OFFROAD2017), so no updates to the construction modeling are required.

#### Operational and HRA-Related Emissions

The "Revised Local Circulation Analysis 2555 W. 190<sup>th</sup> Street Warehouse/Manufacturing Project" dated May 29, 2024 (original dated July 27, 2022) conducted by Linscott, Law and Greenspan (LLG) Engineers, shows that the original 284,130 SF project (analyzed as Option A in the revised LLG Circulation Analysis) would have a total project trip generation of 1,562. At 262,970 SF, the current project is approximately 7.4 percent smaller than the project that was analyzed in the 2022 AQR. Therefore, operational emissions due to project-generated vehicle traffic (autos and trucks) would be approximately 7.4 percent less than those previously analyzed in the 2022 AQR (corresponding to a daily trip generation of approximately 1,446 instead).

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As there will be a reduction in the total building square footage for the smaller project, the operational area source emissions are anticipated to be approximately 7.4 percent less than what was analyzed previously. There are also no changes related to trip distribution; therefore, there would be no changes to CO hot spot emissions, or DPM truck emissions. Therefore, operational AQ-GHG emissions and HRA-related impacts for the revised (smaller) project would be similar to or less than what was previously analyzed and disclosed in the September 2022 AQR. The 2022 AQR of a larger project was a worst-case analysis and disclosed that there would be no significant air quality impacts. Furthermore, the 2022 AQR (including the HRA) utilized the latest emissions factors (CARB EMFAC2021 and OFFROAD2017), so no updates to the operational modeling are required.

#### Energy Use

As there will be a decrease in total square footage by 21,160 SF and parking spaces by 28, no change in the amount of construction equipment, and the trip generation and traffic volume will be less, the energy use of the current project would also be less than previously analyzed in the September 2022 AQR.

### **CONCLUSIONS**

As the latest version of the project will be smaller and have less project-related traffic, the air quality impacts will be less than those disclosed in the 2022 AQR. As the previous (larger) project did not have any significant emissions impacts, the proposed reduction in the size of land use will not result in new or substantial increases in construction or operational AQ-GHG emissions on either a local or regional level, nor will it result in an increase in toxic air contaminants (TACs) during construction and operation, and will not result in an increase in energy use. Furthermore, there have not been any changes or updates to air quality regulations or thresholds since the 2022 AQR was completed and the regulations and thresholds described in the 2022 AQR are current. Additional analysis is not warranted or required.

Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 795-3100 x202.

Sincerely,

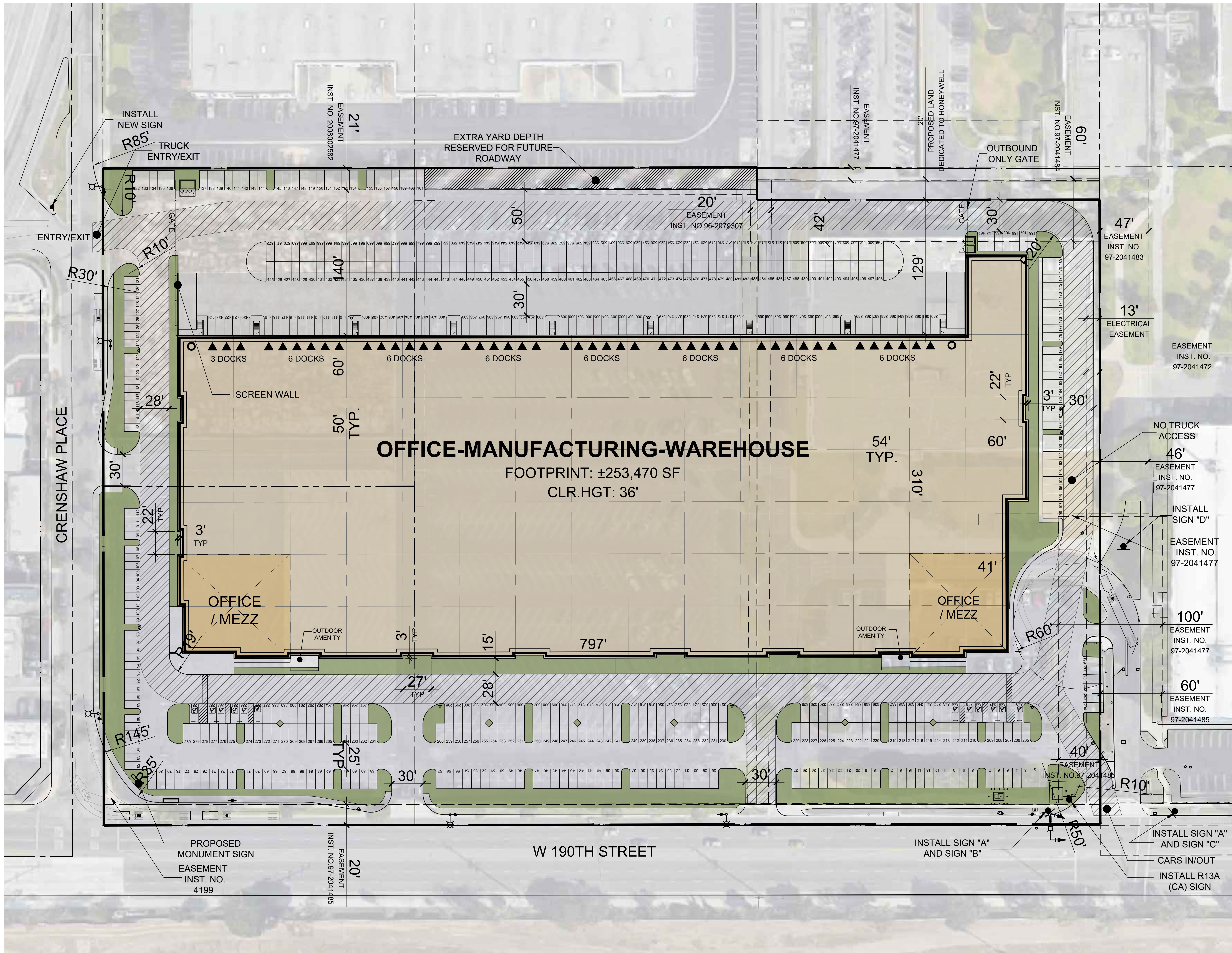
GANDDINI GROUP, INC.



Katie Wilson, M.S.  
Senior Air Quality Analyst

**APPENDIX A**  
**UPDATED PROJECT SITE PLAN**





**PROJECT DATA:**

SITE AREA:	13.59 AC	
GROSS:	592,114 SF	
BUILDING AREA:	253,470 SF	
FOOTPRINT:	253,470 SF	
MEZZANINE:	9,500 SF	
TOTAL BUILDING AREA:	262,970 SF	
BUILDING USE:		
WAREHOUSE	@ 30%	78,891 SF
MANUFACTURING	@ 60%	157,782 SF
OFFICE	@ 10%	26,297 SF
FAR:	0.44	
GROSS:	0.44	
COVERAGE:	43%	
GROSS:	43%	
PARKING REQUIRED:		
WAREHOUSE	1/1500 SF	53 STALLS
MANUFACTURING	1/400 SF	394 STALLS
OFFICE	1/250 SF	105 STALLS
TOTAL		552 STALLS
PARKING PROVIDED:		
STANDARD		522 STALLS
COMPACT	8.7%	50 STALLS
AUTO:	@2.18/1000 SF	572 STALLS
		11 STALLS
<b>REQ. ACCESSIBLE</b>		
TRUCK DOCKS:		
▲ DOCK-HIGH DOORS		45
○ GRADE-LEVEL DOORS		2
LANDSCAPE PROVIDED	@ 9%	51,011 SF

**DEVELOPMENT STANDARDS**

ZONING:	M2
MAX. F.A.R.:	n/a
MAX. COVERAGE:	n/a
BUILDING SETBACKS:	
FRONT:	0 FT
SIDE:	0 FT
REAR:	0 FT
LANDSCAPE SETBACKS:	
FRONT:	n/a
SIDE:	n/a
REAR:	n/a
LANDSCAPE REQ.:	5%
OFF-STREET PARKING:	
STANDARD:	8.5x19
COMPACT:	7.5x15
COMPACT %:	10%
DRIVE AISLE:	25 FT
FIRE LANE:	20 FT
OVERHANG:	2 FT
TREE WELL:	n/a
REQ. PARKING RATIO BY USE:	
WAREHOUSE:	1/1500 SF
OFFICE:	1/250 SF
MANUFACTURING:	1/400 SF

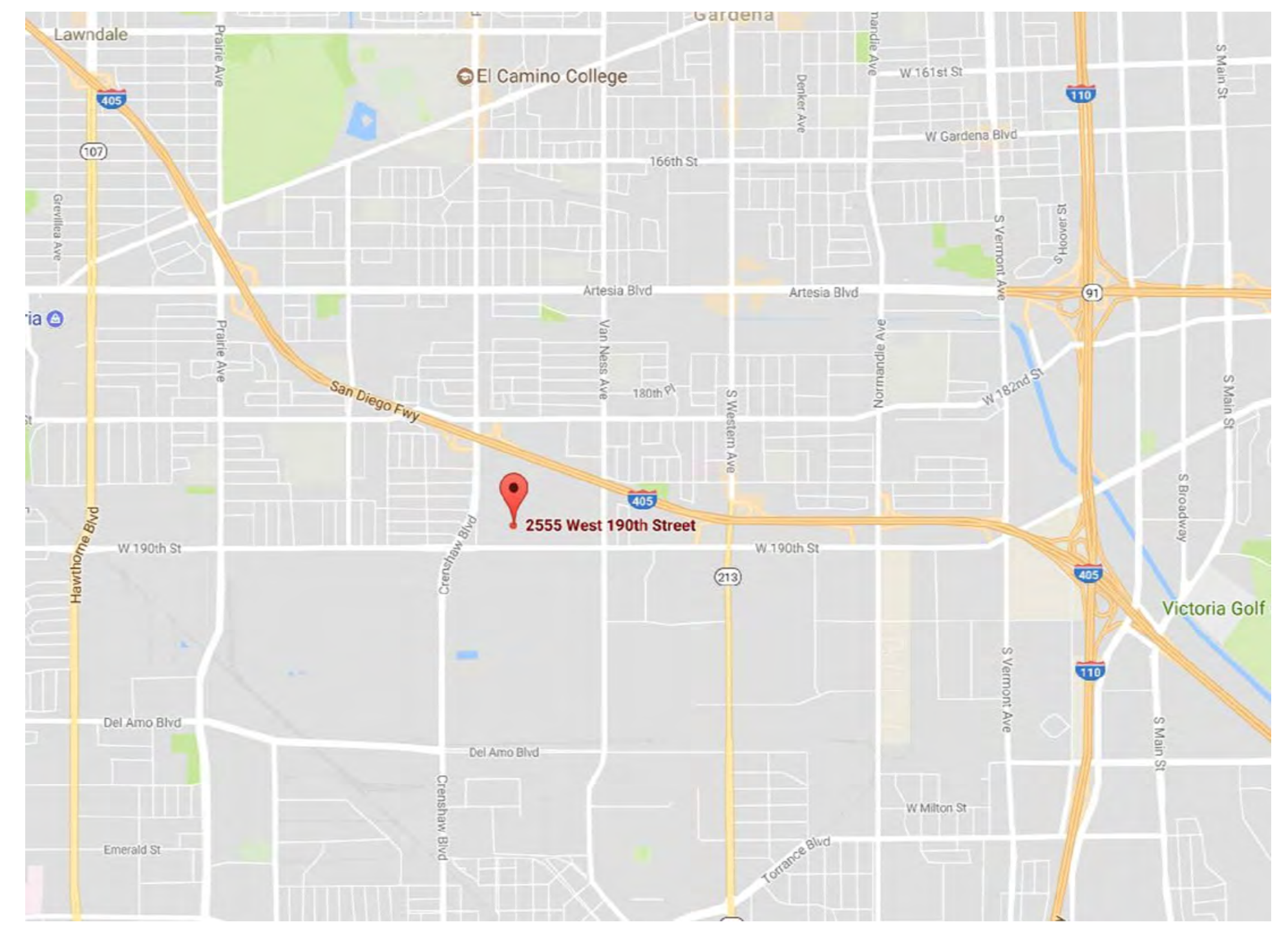
**NOTES:**

- The minimum size of each parking space in a parking lot serving commercial uses shall be no less than eight (8) feet six (6) inches in width and nineteen (19) feet in depth. Where employees parking for industrial uses is required by this Section, eight (8) feet by nineteen (19) feet shall be the minimum size required.
- 2' 8" width required for buildings over 30'-0" in height.

This conceptual design is based upon a preliminary review of entitlement requirements and on unverified and possibly incomplete site and/or building information, and is intended merely to assist in exploring how the project might be developed.

Stormwater Management Design: TO BE VERIFIED WITH CIVIL

Boundary Source: CIVIL CAD FILE



scheme: 10i

Conceptual Site Plan

2555 W 190th St Torrance  
Torrance, CA 90504

**WARE MALCOMB**

LAX18-0056-00  
06.13.2024

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