MEMORANDUM

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To: Steve Finton, P.E., Date: January 6, 2025
Deputy Public Works Director – City Engineer

Cc: Jessamine Que, Associate Engineer
City of Torrance, Public Works Department

From: Richard E. Barretto, P.E., Principal LLG Ref: 2.19.4123.1
Linscott, Law & Greenspan, Engineers

Subject: ***2555 W. 190th Street Warehouse/Manufacturing Project***
CEQA Compliance Memorandum
Torrance, California

Linscott, Law & Greenspan, Engineers (LLG) is pleased to provide the following CEQA compliance memorandum as it pertains to the *Local Circulation Analysis for the 2555 W. 190th Steet Warehouse/Manufacturing Project*, dated December 19, 2024. The traffic analysis was initiated in 2019 prior to the Governor's Office of Planning and Research (OPR) amendment of the CEQA Guidelines to formally implement vehicle miles traveled as the metric for transportation analysis, which was applied state-wide beginning July 1, 2020. As such, this memorandum identifies the proposed Project's compliance with the amended CEQA guidelines to satisfy The City of Torrance Transportation Analysis Requirements for Private Development as well as the updated Department of Transportation (Caltrans) transportation impact guidelines.

A Vehicle Miles Traveled (VMT) Assessment was prepared as a separate document (i.e. refer to the *Vehicle Miles Traveled (VMT) Analysis for the 2555 W. 190th Warehouse Development, dated December 19, 2024)* which identifies that the proposed Project will not have a significant Project Level VMT impact nor a Cumulative VMT impact based on the VMT methodology, criteria, and thresholds identified in the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021).*

Additionally, the Department of Transportation (Caltrans) has formally adopted VMT as the metric for reviewing the transportation impacts of a land use development project. Caltrans has released the Vehicle Miles Traveled-Focused *Transportation Impact Study Guide (TISG)*, dated May 20, 2020 in order to provide guidance on Caltrans' review of land use projects.

Caltrans' TISG references the *Technical Advisory on Evaluating Transportation Impacts In California Environmental Quality Act* (CEQA), dated December 2018, prepared by the State of California Governor's Office of Planning and Research (OPR) as the basis for its guidance on VMT assessment. The City of Torrance adopted new traffic impact criteria to be consistent with the CEQA revisions and OPR recommendations. These new guidelines are contained within the *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects (dated January 2021)* and provide screening criteria and methodology for VMT analysis. As previously noted, the proposed Project will not have a significant Project Level VMT impact nor a Cumulative VMT impact. The *Caltrans Interim Land*

Development and Intergovernmental Review (LDIGR) Safety Review Practitioners Guidance, dated July 2020, provides direction on a simplified safety analysis approach that reduces the risk to all road users and that focuses on multi-modal conflict analysis as well as access management issues. District traffic safety staff are encouraged to consider the proposed Project's potential influence on safety on state roadways, including the following factors:

- Increased presence of pedestrians and bicyclists
- Degradation of the walking and bicycling environment and experience
- New pedestrian and bicyclist connection desires
- Multimodal conflict points, especially at intersections and project access locations
- Change in traffic mix such as an increase in bicyclists or pedestrians where features such as shoulders or sidewalks may not exist or are inconsistent with facility design (sidewalks, bike and multi-user paths, multimodal roadways, etc.)
- Increased vehicular speeds
- Transition between free flow and metered flow
- Increased traffic volumes
- Queuing at off-ramps resulting in slow or stopped traffic on the mainline or speed differentials between adjacent lanes
- Queuing exceeding turn pocket length that impedes through-traffic

The proposed Project does not take direct access from a State facility; however, it is recommended to evaluate the Project's potential impacts on queuing at Caltrans intersections in order to determine if the Project would cause, or contribute towards, slowing or stopped traffic on freeway mainline travel lanes, off-ramps, and State highway lanes that could result in unsafe speed differentials between adjacent lanes. Section 8.0 of the traffic study includes off-ramp queueing analyses at the four (4) state-controlled study locations. As noted in the traffic study, levels of service are anticipated to operate at acceptable conditions and the off-ramp queues are considered adequate.

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 262,970 SF consisting of 26,297 SF office, 78,891 SF warehouse, and 157,782 SF manufacturing. However, the December 2024 traffic study conservatively evaluates the development of a 284,130 SF building consisting of 28,413 SF office, 85,239 SF warehouse, and 170,478 SF manufacturing. Below presents a comparison between the Project that was assessed in the December 2024 traffic study and what is now proposed (Current Project).

Land Use / Project Description	December 2024 Traffic Study	Current Project	Project Change
Office/ Warehouse / Manufacturing Floor Area Allocation			
❑ Office	28,413 SF	26,297 SF	-2,116 SF
❑ Warehouse	85,239 SF	78,891 SF	-6,348 SF
❑ Manufacturing	170,478 SF	157,782 SF	-12,696 SF
Total Building Floor Area	**284,130 SF**	**262,970 SF**	**-21,160 SF**

Review of the table above indicates that the Current Project is 21,160 SF less than what was assessed as part of the December 2024 traffic study. ***Table 1***, provided at the end of this memorandum, presents a trip generation comparison of the Current Project to the December 2024 Traffic Study. Review of *Table 1* indicates that the Current Project would generate fewer traffic trips when compared to the December 2024 Traffic Study. As such, it can be concluded that the December 2024 traffic study provides a conservative analysis and the Current Project would result in either the same or fewer impacts.

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Please let us know if you have any comments or questions regarding this memorandum.

Attachments

cc: Shane S. Green, P.E. Senior Transportation Engineer
File

TABLE 1
PROJECT TRIP GENERATION FORECAST COMPARISON[1]

ITE Land Use Code / Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Current Project (262,970 SF) Trip Generation Forecast[2]:							
▪ 150: Warehousing (78,891 SF)							
❑ Passenger Cars	107	7	2	9	2	7	9
❑ 2 Axle Trucks	7	1	0	1	0	1	1
❑ 3 Axle Trucks	13	2	0	2	0	2	2
❑ 4+ Axle Trucks	50	5	2	7	5	4	9
Warehousing Total	**177**	**15**	**4**	**19**	**7**	**14**	**21**
▪ 140: Manufacturing (157,782 SF)							
❑ Passenger Cars	596	58	19	77	24	52	76
❑ 2 Axle Trucks	38	7	0	7	2	7	9
❑ 3 Axle Trucks	69	9	4	13	6	13	19
❑ 4+ Axle Trucks	279	43	14	57	24	52	76
Manufacturing Total	**982**	**117**	**37**	**154**	**56**	**124**	**180**
▪ 710: Office Space (26,297 SF)	285	35	5	40	6	32	38
Total Passenger Car Traffic	**988**	**100**	**26**	**126**	**32**	**91**	**123**
Total Truck PCE Traffic	**456**	**67**	**20**	**87**	**37**	**79**	**116**
Current Project (262,970 SF) Total Trip Generation [A]	**1,444**	**167**	**46**	**213**	**69**	**170**	**239**
December 2024 Traffic Study (284,130 SF) Total Project Trip Generation[3] [B]	**1,562**	**181**	**50**	**231**	**77**	**181**	**258**
Current Project vs. December 2024 Traffic Study Trip Generation Comparison ([A] – [B])	**-118**	**-14**	**-4**	**-18**	**-8**	**-11**	**-19**

1 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.

2 Refer to Table 5-1 of the *Local Circulation Analysis for the 2555 W. 190th Steet Warehouse/Manufacturing Project*, dated December 19, 2024, for the trip generation rates used for the trip generation forecast.

3 Source: *Local Circulation Analysis for the 2555 W. 190th Steet Warehouse/Manufacturing Project*, dated December 19, 2024.