July 15, 2021

Mr. Patrick Russell
SARES REGIS
3501 Jamboree Road, Suite 3000
Newport Beach, CA 92660

Subject: SRG Torrance Commerce Center Phase III VMT Screening Analysis, City of Torrance, California

Dear Pat:

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this Vehicles Miles Traveled (VMT) screening analysis for the proposed SRG Torrance Commerce Center Phase III Project (Project).

A. Proposed Project

The Project site is located on the southwest corner of the Western Avenue / 190th Street intersection in the City of Torrance.

The Project is planned to consist of the following use:

- Up to 736,000 square feet of Industrial Park use.

The light industrial uses proposed by the Project are allowed under the site's existing City General Plan "Business Park" Land Use designation. The Project does not propose or require amendment of the site's Business Park Land Use designation.

City Zoning designation of the Project site is Heavy Manufacturing (M-2). The light industrial uses proposed by the Project are permitted or are conditionally permitted in the Heavy Manufacturing Zoning designation. The Project does not propose or require amendment of the site's Heavy Manufacturing Zoning designation.

Moreover, the Project would be required to comply with applicable General Plan Policies, and applicable provisions of the City Zoning Code. Collectively, the General Plan Policies and City Zoning Code act to minimize potential environmental effects that may result from the land uses implemented under the Project.

Exhibit A shows the Project location. Exhibit B shows the Project site plan.

B. Existing Uses

The Project uses would displace the existing uses on the site. The Project site, which previously was a part of the Toyota Campus, currently contains a total of ten buildings as shown and summarized in Table 1. Exhibit C graphically shows the location of the site and the buildings.

Table 1
Summary of Existing Uses on Project Site

#	Site/Building No.	Address	Site Name	Current/Previous Use	Building Gross Square Footage	Potentially Trip Generating Use?
1	5	19001 South Western Avenue	Toyota Headquarters	Office	330,389	Yes
2	6	19001 South Western Avenue	Campus Dining Center	Cafeteria	11,320	No
3	7	19001 South Western Avenue	Data Center	Data Center	88,307	Yes
4	8	19901 South Western Avenue	HQ Central Plant & Parking	Utility & Parking	22,794	No
5	9	1910 West 190th Street	Scion & Service Garage	Office & Garage	35,618	Yes
6	10	2000 West 190th Street	Lexus	Office	62,009	Yes
7	11	19200 South Gramercy Place	Toyota Administrative Center	Office	67,757	Yes
8	12	1900 West 190th Street	Helipad	Helipad	---	No
9	13	19300 South Gramercy Place	Project Center North	Office	69,719	Yes
10	14	2015 Toyota Way	Project Center South	Office	60,356	Yes
			Total Trip Generating Uses	**Office**	**590,230**	**---**

As shown in Table 1, the Project site currently contains 590,230 square feet of office use.

C. Project vs. Existing uses Trip Generation

Trip generation represents the trips that are attracted and produced by a given land use.

Trip generation rates for the existing land uses, and the Project land uses are determined based on applicable Institute of Transportation Engineers (ITE) 10th Edition trip generation rates, as shown in Table 2.

Table 2
ITE Trip Generation Rates
Project vs. Existing Uses

Land Use	Units	ITE Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Industrial Park (Project Land Use)	TSF	130	0.32	0.08	0.40	0.08	0.32	0.40	3.37
General Office (Existing Land Use)	TSF	710	1.00	0.16	1.16	0.18	0.97	1.15	9.74

Source: *2017 ITE Trip Generation Manual, 10th Edition*; TSF = Thousand Square Feet

Utilizing the ITE trip generation rates shown in Table 2, Table 3 summarizes the daily and peak hour trip generation for the Project.

Table 3
Project Land Use Trip Generation

Land Use (ITE Code)	Quantity	Units [2]	AM			PM			Daily
			In	Out	Total	In	Out	Total	
Industrial Park (130) [Without PCE-Adjustment] [1]	736.000	TSF	238	56	294	62	233	295	2,480
PCE-Adjustment [3]	Passenger Vehicles (87%) [1.0 PCE]		207	49	256	54	203	257	2,158
	2-Axle Trucks (1%) [1.5 PCE]		4	1	5	1	3	4	37
	3-Axle Trucks (1%) [2.0 PCE]		5	1	6	1	5	6	50
	4 or more-Axle Trucks (11%) [3.0 PCE]		79	18	97	20	77	97	818
Total (PCE-Adjusted)			***295***	***69***	***364***	***76***	***288***	***364***	***3,063***

1 Source: *2017 ITE Trip Generation Manual, 10th Edition*

2 TSF = Thousand Square Feet

3 The ITE Trip Generation Handbook documents that on average, approximately 13 percent of the trips generated by the Industrial Park land use category are truck trips. Since the ITE Trip Generation Handbook does not break down trucks by axle type, this analysis utilizes truck axle breakdown data documented in the Fontana Truck Trip Generation Study (2003).

Based on the Fontana Truck Trip Generation Study (2003), out of the 13 percent total truck traffic, 7.9 percent (equivalent to 1% of total traffic) of Industrial Park truck trips consist of 2 axle trucks, 7.1 percent (equivalent to 1% of total traffic) of Industrial Park truck trips consist of 3 axle trucks, and 85 percent (equivalent to 11% of total traffic) of Industrial Park truck trips consist of 4 or more axle trucks.

As shown in Table 3, to account for the large trucks, the trip generation for trucks has been converted to passenger car equivalents (PCE).

As shown in Table 3, without applying PCE-factors, the Project is forecast to generate approximately 2,480 daily trips which include approximately 294 AM peak hour trip and approximately 295 PM peak hour trips.

As also shown in Table 3, after applying PCE-factors, the Project is forecast to generate approximately 3,063 PCE-adjusted daily trips which include approximately 364 PCE-adjusted AM peak hour trip and approximately 364 PCE-adjusted PM peak hour trips.

Table 4 shows the trip generation for the existing uses. The existing uses would be displaced by the Project.

Table 4
Existing Land Use Trip Generation

Land Use (ITE Code)	Quantity	Units [2]	AM			PM			Daily
			In	Out	Total	In	Out	Total	
General Office (710) [1]	590.230	TSF	589	96	685	109	570	679	5,749

1 Source: *2017 ITE Trip Generation Manual, 10th Edition*

2 TSF = Thousand Square Feet

As shown in Table 4, based on ITE trip generation rates, the existing uses to be displaced by the Project can potentially generate 5,749 daily trips which include approximately 685 AM peak hour trip and approximately 679 PM peak hour trips.

Table 5 shows the net trip generation for the Project after accounting for the potential trip generation associated with the existing land uses.

Table 5
Project Net Trip Generation

Land Use	AM			PM			Daily
	In	Out	Total	In	Out	Total	
Project (PCE-Adjusted)	295	69	364	76	288	364	3,063
Existing Use	-589	-96	-685	-109	-570	-679	-5,749
Net Difference	**-294**	**-27**	**-321**	**-33**	**-282**	**-315**	**-2,686**

As shown Table 5, when compared to the existing land uses which will be displaced, after adjusting for trucks (PCE adjustments), the Project is expected to generate approximately 2,686 fewer NET daily trips which include approximately 321 fewer NET trips during the AM peak hour and approximately 315 fewer NET trips during the PM peak hour.

D. City of Torrance Vehicle Miles Travelled (VMT) Analysis Requirements

Senate Bill (SB) 743 mandates that VMT replace automobile delay and Level of Service (LOS) as the transportation impact metric under the California Environmental Quality Act (CEQA). Pursuant to CEQA Guidelines, Section 15064.3, VMT is the most appropriate measure of transportation impacts. The California Governor's Office of Planning and Research (OPR) issued a Technical Advisory in December 2018 which described their recommended procedures and methodology for VMT analysis. The key purpose and goal of OPR's VMT evaluation is to determine if a Project will result in longer travel distances and associated increased greenhouse gas emissions.

Consistent with SB 743, CEQA Guidelines, and OPR guidance, the City of Torrance traffic study guidelines (*City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects, January 2021)* incorporates and reflects the appropriate VMT methodologies, thresholds of significance, and feasible mitigation measures for CEQA documents.

The City of Torrance traffic study guidelines establish screening criteria that can be employed to identify projects expected to have a less than significant VMT impact. If the City determines that a given project satisfies one or more of the traffic study guidelines VMT impact screening criteria, a detailed Project-level VMT assessment is generally not required. City of Torrance traffic study VMT screening criteria are listed below. These screening criteria are applicable to projects that are consistent with the Southern California Association of Governments 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2020 – 2045 RTP/SCS); and that would not adversely affect transit systems, bicycle systems, or pedestrian networks.

Traffic Study Guidelines VMT Impact Screening Criteria:

a) **Small Projects:** Will the project generate a net increase of 110 or less daily trips?

b) **Low-VMT Map-based Screening for Residential and Office Projects:** Is the Project a residential project in a low VMT per capita area or an office project in a low VMT per employee area?

c) **Proximity to Transit:** 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?

'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 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.

d) **Affordable Residential Development:** Is the Project 100% affordable housing units?

e) **Local Serving Retail:** Does the Project contain a retail use of 50,000 SF or less?

f) **Local-Serving Public Facility:** Is the project a locally serving public facility?

A project analysis may use any of the above criteria to screen out.

E. Project VMT Screening

Even though the existing uses at the subject site are not currently occupied, a new tenant with permitted uses and operations can readily occupy the existing buildings and site and begin to generate VMT without the need for additional discretionary approvals.

Hence, for the purposes of this VMT analysis, it is appropriate to take the trip generation potential of the existing unoccupied land uses into account when calculating net trip generation resulting from the Project.

As previously shown in Table 5, when compared to the existing land uses which will be displaced, after adjusting for trucks (PCE adjustments), the Project is expected to generate approximately 2,686 fewer NET daily trips which include approximately 321 fewer NET trips during the AM peak hour and approximately 315 fewer NET trips during the PM peak hour.

Per the City's VMT impact analysis guidelines, projects that are consistent with the SCAG 2020 – 2045 RTP/SCS; that would not result in adverse impacts to transit, bicycle, or pedestrian systems/facilities; and that would result in a net increase of 110 or fewer daily trips, may be screened out from VMT analysis since their VMT impact can be considered less than significant.

F. Project VMT Impact Summary

SCAG 2020 – 2045 RTP/SCS Consistency

Development of the City pursuant to the General Plan is reflected in the SCAG 2020 – 2045 RTP/SCS. The Project is consistent with the General Plan and by extension is consistent with the SCAG 2020 – 2045 RTP/SCS.

Impacts to Transit Systems, Bicycle Systems, and Pedestrian Access

All Project circulation system improvements including roadways, sidewalks, and bike lane/route improvements would be designed and constructed consistent with City standards. Sidewalks are provided along all Project site boundaries. Pedestrian access would be provided within the Project site with connections to existing and future walkways along adjacent roadways. The Project would facilitate and would not obstruct City goals and policies to provide efficient and safe pedestrian access.

The *City of Torrance Traffic Impact Assessment Guidelines for Land Use Projects*, January 2021 identifies a Class 3 Bike Routes along Van Ness Avenue (N – S), approximately 0.2 miles easterly of the Project site; and along 190th Street (E – W), the Project site northerly boundary. The Project would accommodate and would not interfere with designated or planned bicycle facilities.

Based on the preceding, the Project is not expected to adversely affect transit systems, bicycle systems, or pedestrian access.

Net Trip Generation

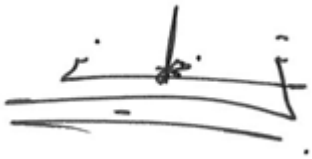
As substantiated herein, the Project would not result in 110 NET new trips. In point of fact, it is estimated that the Project would result in approximately 2,686 fewer NET daily trips which include approximately 321 fewer NET trips during the AM peak hour and approximately 315 fewer NET trips during the PM peak hour.

G. Project VMT Impact Conclusion

Based on the preceding, the Project satisfies the City traffic study guidelines "Small Projects" VMT impact criteria. The Project VMT impact is therefore considered less than significant, and a detailed VMT impact analysis is not required.

If you have any questions regarding this study, or need further review, please do not hesitate to call our office at (949) 474-0809.

Kind regards,



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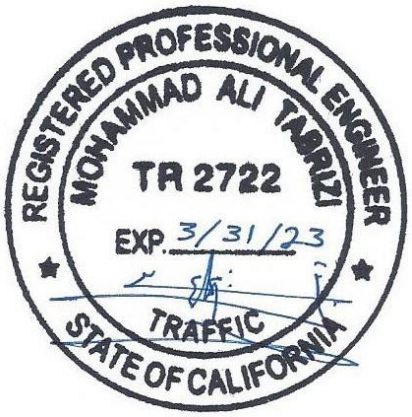


Exhibits

Exhibit A

Location Map

Legend:

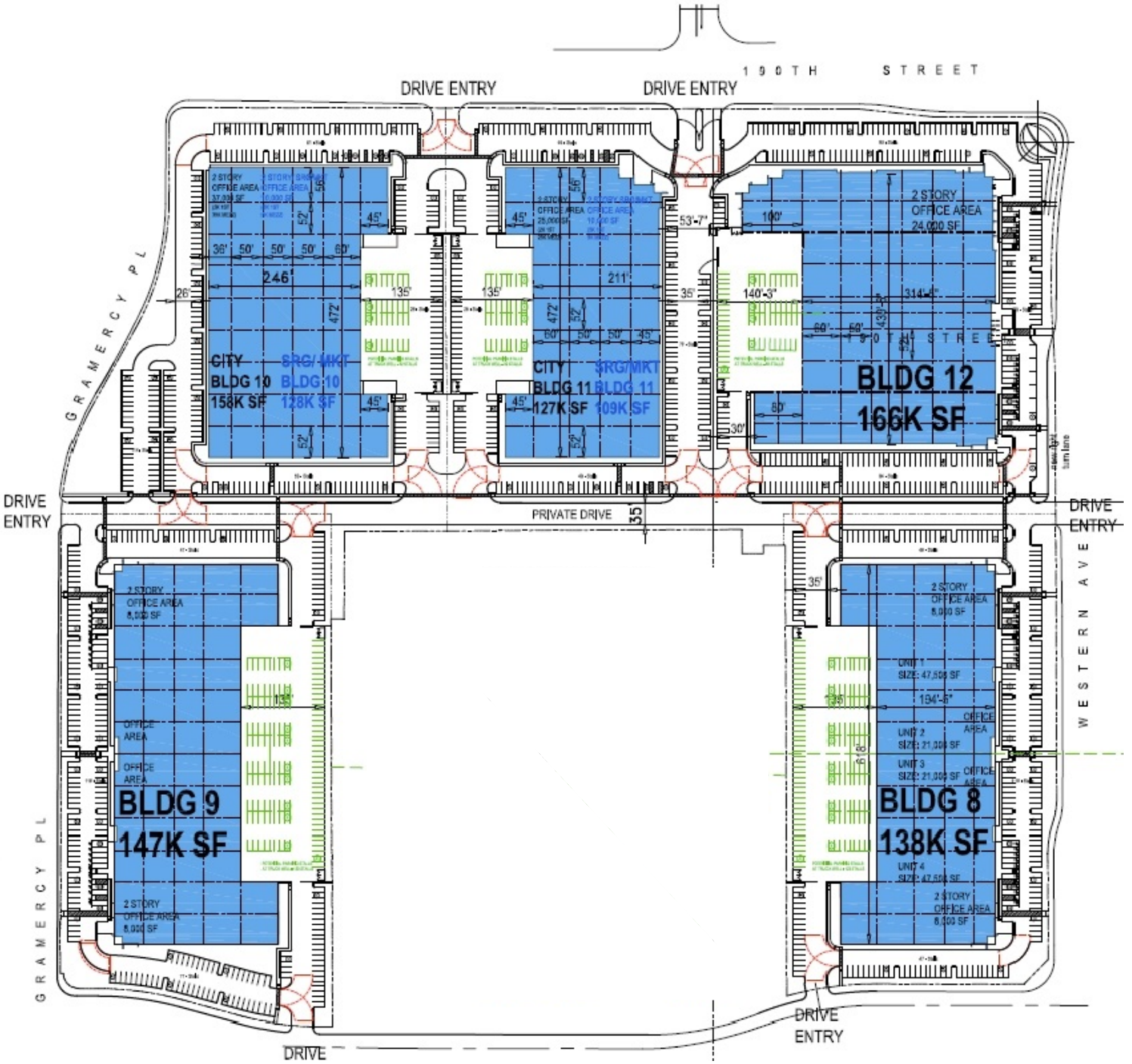
- - - = Project Site Boundary

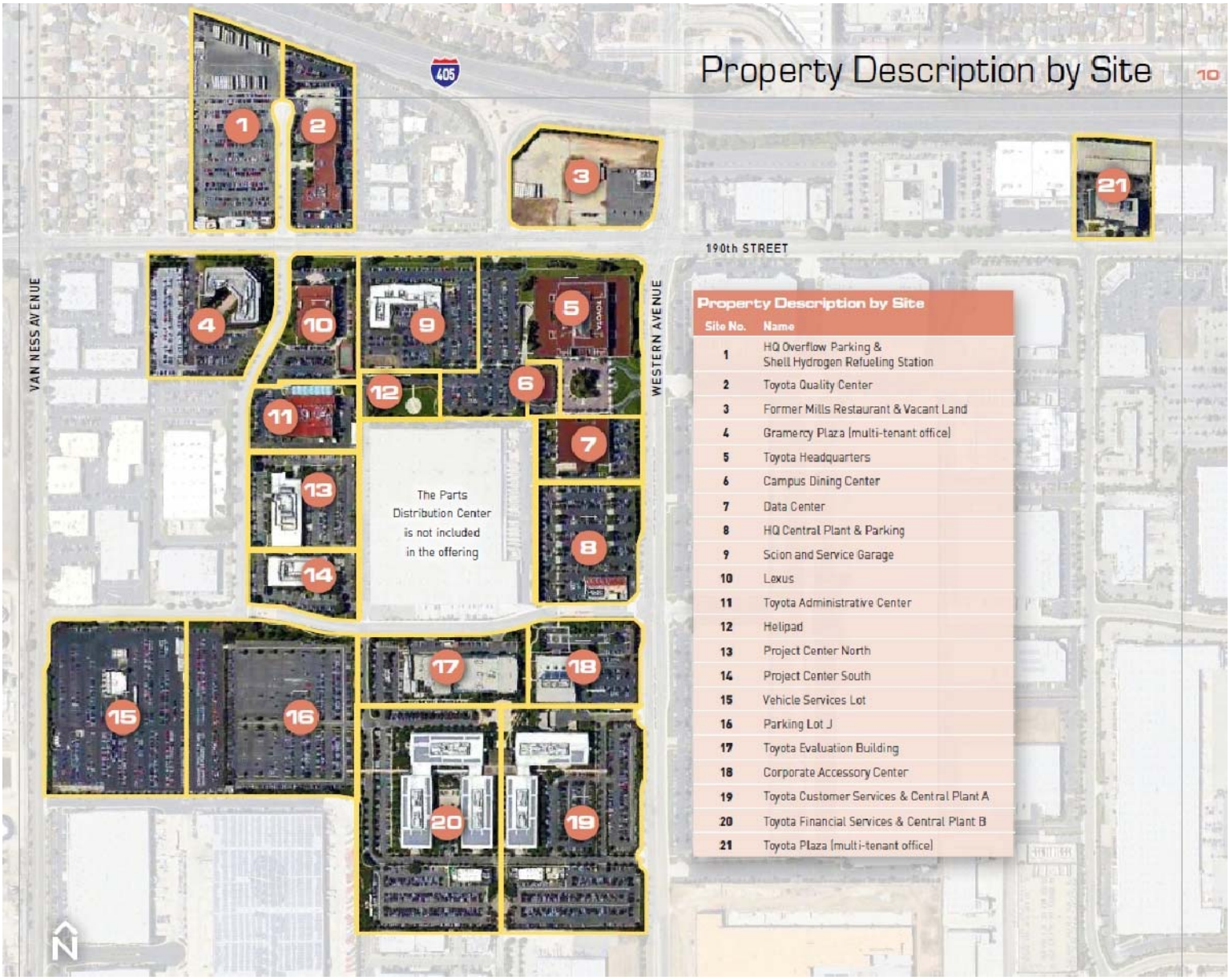
N

RK engineering group, inc.

Exhibit B

Site Plan





Property Description by Site

Site No.	Name
1	HQ Overflow Parking & Shell Hydrogen Refueling Station
2	Toyota Quality Center
3	Former Mills Restaurant & Vacant Land
4	Gramercy Plaza (multi-tenant office)
5	Toyota Headquarters
6	Campus Dining Center
7	Data Center
8	HQ Central Plant & Parking
9	Scion and Service Garage
10	Lexus
11	Toyota Administrative Center
12	Helipad
13	Project Center North
14	Project Center South
15	Vehicle Services Lot
16	Parking Lot J
17	Toyota Evaluation Building
18	Corporate Accessory Center
19	Toyota Customer Services & Central Plant A
20	Toyota Financial Services & Central Plant B
21	Toyota Plaza (multi-tenant office)

N