

To: City of Orange
From: Simon Lin, EIT
Meghan Macias, TE
EPD Solutions, Inc.
Date: 12/10/2025
Site: 2411 Glassell Street Warehouse Project
Subject: **Vehicle Miles Traveled (VMT) Screening Analysis for 2411 Glassell Street Warehouse Project - EPD Project No. 24-092**

This technical memorandum provides an evaluation of the proposed 2411 Glassell Street Warehouse Project (Project) located on a 12.1-acre site at 2411 North Glassell Street, in the city of Orange, California (Assessor's Parcel Number [APN] 374-381-01 and 374-381-02). The location of the Project is shown in Figure 1. The purpose of this memorandum is to evaluate whether a vehicle miles traveled (VMT) analysis is required for the Project, in accordance with the City of Orange *Traffic Impact Analysis Guidelines for VMT and Level of Service Assessment* (July 2020) (City's TIA Guidelines).

Project Description

The existing site contains three 2-story concrete tilt-up office buildings, totaling 191,127 square feet (SF) in a circular building campus layout. The Project would demolish the existing three buildings on-site and redevelop the site with a one-story (plus mezzanine) 298,988 SF industrial building. The proposed industrial building would be comprised of 171,188 SF of warehouse space, 109,000 SF of manufacturing space, and 9,400 SF of office space on the ground floor, and 9,400 SF of additional office space on the mezzanine level. The proposed Project site plan is shown in Figure 2.

Project Trip Generation

The proposed Project trip generation was calculated using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 11th Edition* (2021). The existing office buildings were analyzed using the land use code for General Office Building (ITE Land Use Code 710). The proposed Project was analyzed using the land use codes for Manufacturing (ITE Land Use Code 140) and Warehouse (ITE Land Use Code 150). The vehicle splits from the South Coast Air Quality Management District (SCAQMD) Warehouse Truck Trip Study and the passenger vehicle/truck split from the ITE rates were applied to both warehouse and manufacturing uses (without cold storage).¹

Table 1 presents the trip generation estimates for the existing use and the proposed Project. The existing site generates 2,072 daily trips, including 291 trips during the AM peak hour and 275 trips during the PM peak hour. The proposed Project is estimated to generate 843 daily trips, with 108 trips during the AM peak hour and 116 trips during the PM peak hour. Overall, the Project is expected to result in 1,229 fewer daily trips, 184 fewer trips during the AM peak hour, and 160 fewer trips during the PM peak hour.

¹ Passenger car/truck splits are derived from ITE Land Use Code 150 - Warehousing. Truck mix was derived from the SCAQMD Warehouse Truck Trip Study Data Results and Usage, July 17, 2014, for warehouse without cold storage.

Figure 1: Project Location

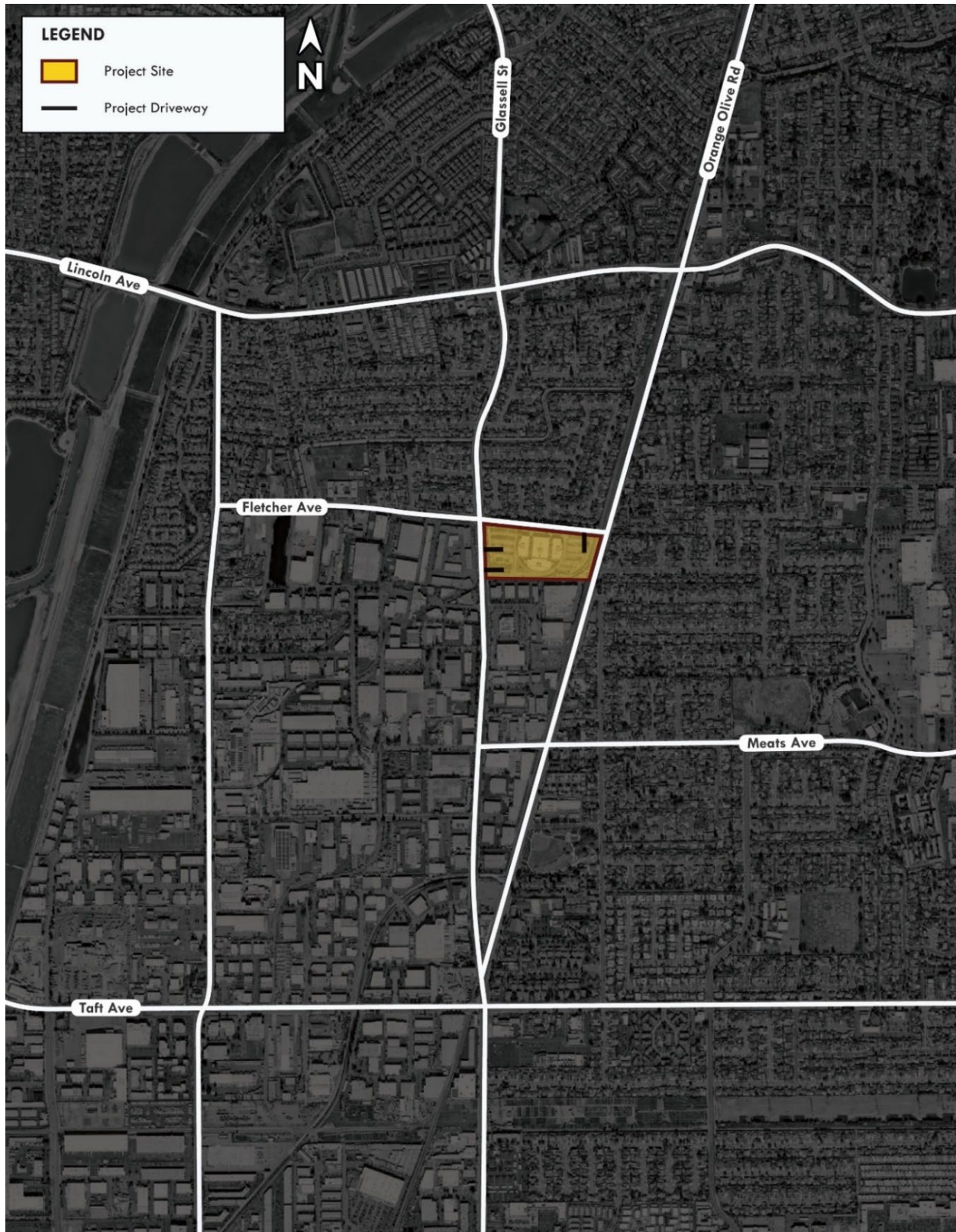


Table 1: Project Trip Generation

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Rates								
710 General Office Building ¹	TSF	10.84	1.34	0.18	1.52	0.24	1.20	1.44
150 Warehousing ²	TSF	1.71	0.13	0.04	0.17	0.05	0.13	0.18
140 Manufacturing ³	TSF	4.75	0.52	0.16	0.68	0.23	0.51	0.74
Existing Site Trip Generation								
Existing Office Buildings¹	191.127 TSF	2,072	256	35	291	47	228	275
Proposed Project Trip Generation								
Proposed Warehouse ²	189.188 TSF	324	25	7	32	10	25	34
Vehicle Mix⁴								
	Percent							
Passenger Vehicles	64.91%	210	17	5	21	6	17	23
2-Axle Trucks	5.87%	19	1	0	2	1	1	2
3-Axle Trucks	7.27%	24	2	1	2	1	1	2
4+-Axle Trucks	21.95%	72	5	2	7	2	5	7
Total Trip Generation	100.0%	325	25	7	33	10	24	34
Proposed Site Trip Generation								
Proposed Manufacturing ³	109.000 TSF	518	56	18	74	25	56	81
Vehicle Mix⁵								
	Percent							
Passenger Vehicles	90.53%	469	51	16	67	23	51	73
2-Axle Trucks	1.58%	8	1	0	1	0	1	1
3-Axle Trucks	1.96%	10	1	0	1	0	1	2
4+-Axle Trucks	5.93%	31	4	2	6	2	4	6
Total Trip Generation	100.0%	518	56	19	75	25	57	82
Total Proposed Project Passenger Vehicle Trips		680	68	20	88	29	68	96
Total Proposed Project Trip Generation		843	81	26	108	35	81	116
Net Passenger Vehicle Trips		-1,392	-188	-15	-203	-18	-161	-178
Net Project Trip Generation		-1,229	-175	-9	-184	-12	-147	-160

TSF = Thousand Square Feet

PCE = Passenger Car Equivalent

¹ Trip rates from the Institute of Transportation Engineers, *Trip Generation Manual, 11th Edition, 2021*. Land Use Code 710-General Office Building² Trip rates from the Institute of Transportation Engineers, *Trip Generation Manual, 11th Edition, 2021*. Land Use Code 150 - Warehousing.³ Trip rates from the Institute of Transportation Engineers, *Trip Generation Manual, 11th Edition, 2021*. Land Use Code 140 - Manufacturing.⁴ Passenger car/truck splits are derived from ITE Land Use Code 150 - Warehousing. Truck Mix from the SCAQMD Warehouse Truck Trip Study Data Results and Usage, July 17, 2014. Without Cold Storage.⁵ Passenger car/truck splits are derived from ITE Land Use Code 140 - Manufacturing. Truck Mix from the SCAQMD Warehouse Truck Trip Study Data Results and Usage, July 17, 2014. Without Cold Storage.

* The table might contain minor rounding errors due to multiple rates and or percentages being applied. Priority was placed on the total trips. The minor rounding errors would not impact the overall analysis.

Vehicle Miles Traveled Screening

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts, aiming to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. In response, Section 15064.3, *Determining the Significance of Transportation Impacts*, was added to the CEQA Guidelines, which states that VMT is the most appropriate measure of transportation impacts and shall apply statewide beginning on July 1, 2020.

The *CEQA Assessment – VMT Analysis* section of the City's TIA Guidelines provides VMT screening thresholds to identify projects that would be considered to have a less-than-significant impact on VMT and therefore could be screened from further analysis. If a project meets one of the following criteria, then the VMT impact of the project would be considered less than significant and no further analysis of VMT would be required:

1. Transit Priority Area (TPA) Screening
2. Low VMT Area Screening
3. Project Type Screening

The applicability of each criterion to the Project is discussed below.

Screening Criterion 1 – Transit Priority Area Screening

According to the City's Guidelines, projects located within a Transit Priority Area (TPA) may be presumed to have a less-than-significant impact. A TPA is defined as a half-mile radius around an existing major transit stop or an existing stop along a high-quality transit corridor. However, projects may not meet the screening threshold if the following criteria are not satisfied:

- The floor area ratio (FAR) is below 0.75.
- The project includes more parking than required by the jurisdiction.
- The project is inconsistent with the applicable Sustainable Communities Strategy.
- The project replaces affordable residential units with a smaller number of moderate- or high-income residential units.

As indicated in Figure 3, *North Orange County Cities TPA Map*, the Project site is not located within a designated TPA. Given that the Project is not within a TPA, it does not satisfy Screening Criterion 1.

Screening Criterion 2 – Low VMT Area Screening

The City of Orange TIA Guidelines utilize the Orange County Traffic Analysis Model (OCTAM) travel demand forecasting tool to identify low VMT-generating areas for screening purposes. Under these guidelines, projects located within areas that generate VMT below the City average may be presumed to have a less-than-significant VMT impact and may be screened from detailed VMT analysis.

As shown in Figure 4, *Low VMT Area Screening*, the Project site is located within an area with VMT higher than the City of Orange average. Therefore, the Project does not meet Screening Criterion 2 for low VMT areas.

Screening Criterion 3 – Project Type Screening

According to the City's TIA Guidelines, projects proposing local-serving uses, such as community-oriented facilities, are generally presumed to have a less-than-significant impact on VMT. Local-serving uses include K-12 schools, daycare centers, local parks, student housing, and community institutions like libraries and fire stations. Additionally, projects generating fewer than 110 average daily vehicle trips are typically not expected to substantially increase citywide or regional VMT.

In light of recent Court of Appeal ruling in *Cleveland Nat. Forest Foundation v. County of San Diego* and EPD's correspondence with City of Orange staff, the 110 daily trips is no longer a screen-out criteria with the City of Orange, despite its inclusion in the guideline. Based on the *Cleveland National Forest* ruling, each lead agency must define a small project, based on local context and fact-based substantial evidence, for the purpose of identifying significant VMT impacts.

Accordingly, this screening analysis instead considers the Project's net change in VMT, consistent with the Governor's Office of Planning and Research (OPR), *Technical Advisory on Evaluating Transportation Impacts in CEQA* (original Dec. 2018; updated Jan. 22, 2019), "Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact."

In order to evaluate the net overall change in VMT for the proposed Project, the following VMT evaluation methodology via the Orange County Transportation Analysis Model (OCTAM) was outlined and provided to City of Orange staff on September 22, 2025:

- Based on the Southern California Association of Governments' Sustainable Communities Strategy (September 2020), employees for the existing and proposed uses have been calculated based on the following:
 - For the existing three buildings onsite totaling 191,127 SF, employment category "Office Services (Suburban)" was used, which would yield 1 employee per 350 SF. The existing buildings onsite would represent 547 service employees in the "No Project" scenario of OCTAM
 - For the proposed building consisting of 189,988 SF of warehouse and 109,000 SF of manufacturing, employment category "Transportation and Warehousing (Suburban)," which would yield 1 employee per 1700 SF, and employment category "Manufacturing (Suburban)," which would yield 1 employee per 650 SF, were used. The proposed building would represent 112 warehouse employees and 168 manufacturing employees, or 280 total basic employees in the "Plus Project" scenario of OCTAM.
- In order to evaluate Base Year (2019) and the Future Year (2050) without and with Project conditions, EPD modified the OCTAM model by updating the Project's socio-economic data (SED) to input Project data into the existing Transportation Analysis Zone (TAZ) 570, where the Project is located. The original land use in TAZ 570 was moved to the adjacent TAZ (TAZ 567), in order to isolate TAZ 570 so that the Project-generated VMT can be identified without and with the Project.
- To calculate the change in VMT with the Project, the following four model runs were conducted:
 - 2019 No Project model run, with 547 service employees isolated in Project TAZ (TAZ 570)
 - 2019 Plus Project model run, with 280 basic employees isolated in Project TAZ (TAZ 570)
 - 2050 No Project model run, with 547 service employees isolated in Project TAZ (TAZ 570)
 - 2050 Plus Project model run, with 280 basic employees isolated in Project TAZ (TAZ 570)
- If the total VMT is less under the Plus Project scenario compared to the No Project scenario, this would provide substantial evidence that the Project would result in a less-than-significant VMT impact.

The City of Orange approved the VMT methodology outlined above on November 17, 2025. The approval email for the VMT methodology can be found in Appendix A.

With the methodology noted above, OCTAM was run for the Base Year (2019) and Cumulative Year (2050) under No Project and Plus Project conditions (i.e., four full model runs). The total Origin-Destination (OD) VMT of the Project TAZ was evaluated using the OCTAM VMT post-processor from the OCTAM Base Year (2019) and Cumulative Year (2050) Plus Project model runs. The Baseline 2025 VMT of the Project TAZ was interpolated using linear interpolation between the 2019 and 2050 model outputs.

All OCTAM inputs and outputs can be found in Appendix B.

The VMT evaluation results for the Project (TAZ 570) using OCTAM are shown in Table 2. As shown in Table 2, the Project's VMT would be 25,927 less under the Baseline (2025) Plus Project scenario and 25,093 less under the Cumulative (2050) Plus Project scenario, compared to the No Project scenario.

Therefore, this provides substantial evidence that total VMT is less under the Plus Project scenario compared to the No Project scenario, and the Project would result in a less-than-significant VMT impact.

Table 2: TAZ 570 VMT Evaluation using OCTAM

	OCTAM 5.1 TAZ	TAZ 570	
	Base Year 2019 Total VMT ¹	Baseline 2025 Total VMT	Cumulative Year 2050 Total VMT ¹
Existing Use	37,738	37,626	37,159
Proposed Project	11,611	11,699	12,066
Net VMT	-26,127	-25,927	-25,093

¹ Source: OCTAM 5.1

Summary

The proposed 2411 Glassell Street Warehouse Project was evaluated to determine whether a VMT analysis is required. Based on the OCTAM VMT evaluation methodology approved by the City of Orange, the Project's VMT would be 25,927 less under the Baseline (2025) Plus Project scenario and 25,093 less under the Cumulative (2050) Plus Project scenario, compared to the No Project scenario.

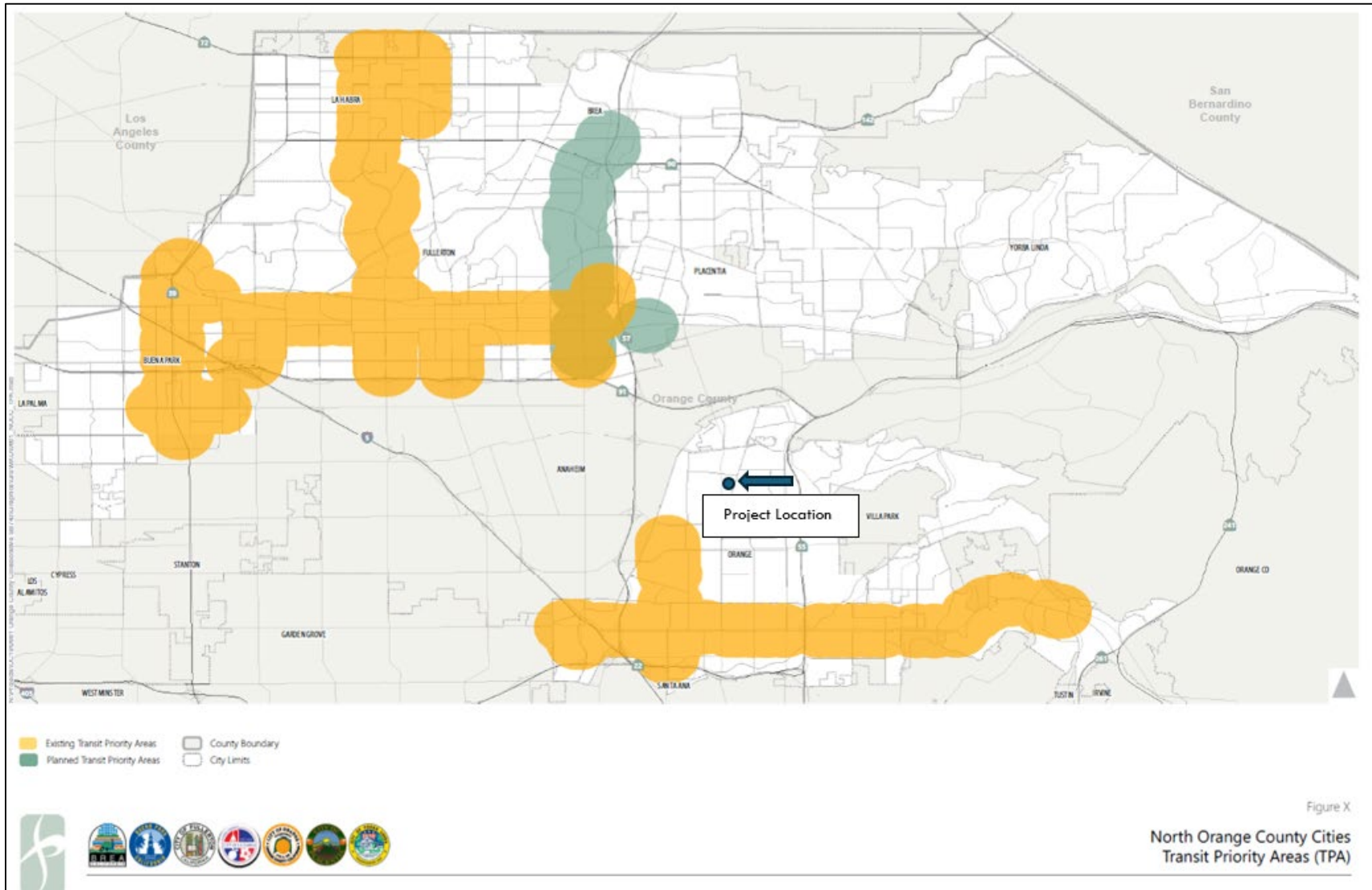
Therefore, this provides substantial evidence that total VMT is less under the Plus Project scenario compared to the No Project scenario, and the Project would result in a less-than-significant VMT impact.

If you have any questions, please feel free to contact us at techservices@epdsolutions.com or at (949) 794-1180.

Respectfully submitted,

EPD Solutions, Inc.

Figure 3: North Orange County Cities TPA Map



APPENDIX A – APPROVED VMT METHDOLOGY

From: [Maria Prado Flores](#)
To: [Sacheen Premaratne](#); [Larry Tay](#)
Cc: [Ryan Agbayani](#); [Simon Lin](#); [Meghan Macias](#); [Danielle Thayer](#); [Tanya Kalaskar](#); [Jon Tanury](#); [Brandon Wolfe](#); [Luis Gomez](#)
Subject: RE: VMT Screening Memo 2411 Glassell St Warehouse Project
Date: Monday, November 17, 2025 11:14:16 AM
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image008.png](#)

[NON-EPD]

Hi Sacheen,

EPD can move forward with the VMT methodology that was outlined.

Maria Flores

Assistant Engineer



Public Works – Traffic Division

300 E. Chapman Ave | Orange, CA 92866

Direct: (714) 744-5541 | www.cityoforange.org

From: Sacheen Premaratne <sacheen@epdsolutions.com>

Sent: Wednesday, November 12, 2025 9:55 AM

To: Maria Prado Flores <mpflores@cityoforange.org>; Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>

Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Simon Lin <slin@epdsolutions.com>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Jon Tanury <jtanury@rexfordindustrial.com>; Brandon Wolfe <brandon@epdsolutions.com>; Luis Gomez <lgomez@rexfordindustrial.com>

Subject: RE: VMT Screening Memo 2411 Glassell St Warehouse Project

Hi Maria,

Kindly following up here,

Now that you have the 2019 lease agreement, I wanted to check in with your team to confirm our VMT methodology. As mentioned, our team would like to move forward with the project's remaining efforts pertaining to CEQA and Technical Studies.

Thank you,

Sacheen Premaratne | *Senior Project Coordinator*

Sacheen@epdsolutions.com

949.522.2746 | cell

3333 Michelson Drive | Suite 500 | Irvine, CA 92612

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E | P | D SOLUTIONS, INC

How did we do today? Please let us know by answering this short [Survey!](#)

From: Maria Prado Flores <mpflores@cityoforange.org>

Sent: Tuesday, October 21, 2025 9:30 AM

To: Luis Gomez <lgomez@refordindustrial.com>; Brandon Wolfe <brandon@epdsolutions.com>; Simon Lin <slin@epdsolutions.com>; Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>

Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Jon Tanury <jtanury@refordindustrial.com>

Subject: RE: VMT Screening Memo 2411 Glassell St Warehouse Project

[NON-EPD]

Hi Luis,

We would need 2019 leases for option 1.

Maria Flores

Assistant Engineer



Public Works – Traffic Division

300 E. Chapman Ave | Orange, CA 92866

Direct: (714) 744-5541 | www.cityoforange.org

From: Luis Gomez <lgomez@refordindustrial.com>

Sent: Monday, October 20, 2025 12:49 PM

To: Maria Prado Flores <mpflores@cityoforange.org>; Brandon Wolfe <brandon@epdsolutions.com>; Simon Lin <slin@epdsolutions.com>; Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>

Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen Premaratne

<sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Jon Tanury <jtanury@rexfordindustrial.com>

Subject: Re: VMT Screening Memo 2411 Glassell St Warehouse Project

Maria,

Can you confirm what leases you'd like to view for Option 1? Current or 2019 leases?

[Redacted]

LUIS GOMEZ
Vice President, Development
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[Redacted]

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11620 Wilshire Blvd., Suite 1000
Los Angeles, CA 90025

[Redacted]

Monthly Charity Partner



From: Maria Prado Flores <mpflores@cityoforange.org>

Sent: Thursday, October 16, 2025 12:15 PM

To: Brandon Wolfe <brandon@epdsolutions.com>; Luis Gomez <lgomez@rexfordindustrial.com>;
Simon Lin <slin@epdsolutions.com>; Larry Tay <ltay@cityoforange.org>; Delia Votsch

<d.votsch@fehrandpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>

Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Jon Tanury <jtanury@rexfordindustrial.com>

Subject: RE: VMT Screening Memo 2411 Glassell St Warehouse Project

EXTERNAL EMAIL: Exercise caution before clicking attachments/links.

Hi Brandon,

The traffic team spoke with the City Attorney regarding the proposed VMT approach from September 22. Moving forward, EPD has two options for their VMT analysis:

1. 2019 employee numbers may be used as the baseline if, and only if, lease agreements confirming building occupancy are provided to the satisfaction of the City; else
2. Existing counts will serve as the baseline.

Maria Flores

Assistant Engineer



Public Works – Traffic Division

300 E. Chapman Ave | Orange, CA 92866

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From: Brandon Wolfe <brandon@epdsolutions.com>

Sent: Tuesday, October 14, 2025 11:45 AM

To: Luis Gomez <lgomez@rexfordindustrial.com>; Maria Prado Flores <mpflores@cityoforange.org>; Simon Lin <slin@epdsolutions.com>; Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>

Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Jon Tanury <jtanury@rexfordindustrial.com>

Subject: RE: VMT Screening Memo 2411 Glassell St Warehouse Project

Importance: High

Hello Maria,

I hope all is well. Has your team been able to discuss and confirm our VMT methodology with the City Attorney office per our conversation two weeks ago? Please let us know at your earliest so we can continue forward with the project's remaining efforts pertaining to CEQA and Technical Studies.

Thank you,

Brandon Wolfe | *Project Manager*

brandon@epdsolutions.com

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3333 Michelson Drive | Suite 500 | Irvine, CA 92612

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How did we do today? Please let us know by answering this short [Survey!](#)

E | P | D SOLUTIONS, INC

From: Luis Gomez <lgomez@refordindustrial.com>

Sent: Friday, October 10, 2025 9:07 AM

To: Maria Prado Flores <mpflores@cityoforange.org>; Simon Lin <slin@epdsolutions.com>; Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrendpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>

Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Brandon Wolfe <brandon@epdsolutions.com>; Jon Tanury <jtanury@refordindustrial.com>

Subject: Re: VMT Screening Memo 2411 Glassell St Warehouse Project

[NON-EPD]

Good morning, Maria,

It has been over a week since our last communication. Do you have any updates on the City's response to the proposed VMT methodology? Please advise.

Best regards,

Luis



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Monthly Charity Partner



From: Luis Gomez <lgomez@rexfordindustrial.com>
Sent: Thursday, October 2, 2025 1:28 PM
To: Maria Prado Flores <mpflores@cityoforange.org>; Simon Lin <slin@epdsolutions.com>;
Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie
Adourian <nadourian@cityoforange.org>
Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani
<ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias
<meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen
Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>;
Brandon Wolfe <brandon@epdsolutions.com>; Jon Tanury <jtanury@rexfordindustrial.com>
Subject: Re: VMT Screening Memo 2411 Glassell St Warehouse Project

Thank you, Maria. If it helps, we can have our Land Use Council speak with the City Attorney.
Let me know if you'd like me to arrange the call.

From: Maria Prado Flores <mpflores@cityoforange.org>
Sent: Thursday, October 2, 2025 12:59 PM

To: Luis Gomez <lgomez@rexfordindustrial.com>; Simon Lin <slin@epdsolutions.com>; Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>

Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Brandon Wolfe <brandon@epdsolutions.com>; Jon Tanury <jtanury@rexfordindustrial.com>

Subject: RE: VMT Screening Memo 2411 Glassell St Warehouse Project

EXTERNAL EMAIL: Exercise caution before clicking attachments/links.

Hi Luis,

We are having our City Attorney look over the VMT approach. Once she looks over it, we can respond with an answer.

Maria Flores

Assistant Engineer



Public Works – Traffic Division

300 E. Chapman Ave | Orange, CA 92866

Direct: (714) 744-5541 | www.cityoforange.org

From: Luis Gomez <lgomez@rexfordindustrial.com>

Sent: Thursday, October 2, 2025 9:24 AM

To: Simon Lin <slin@epdsolutions.com>; Maria Prado Flores <mpflores@cityoforange.org>; Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>

Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Brandon Wolfe <brandon@epdsolutions.com>; Jon Tanury <jtanury@rexfordindustrial.com>

Subject: Re: VMT Screening Memo 2411 Glassell St Warehouse Project

Good morning City of Orange Team,

Just following up again on previous correspondence regarding the VMT approach. We look forward to your response.

Thank you,

LUIS GOMEZ
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Monthly Charity Partner

From: Luis Gomez <lgomez@refordindustrial.com>
Sent: Tuesday, September 30, 2025 9:22 AM
To: Simon Lin <slin@epdsolutions.com>; Maria Prado Flores <mpflores@cityoforange.org>; Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>
Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Brandon Wolfe <brandon@epdsolutions.com>; Jon Tanury <jtanury@refordindustrial.com>
Subject: Re: VMT Screening Memo 2411 Glassell St Warehouse Project

Dear Larry and Delia,

We would greatly appreciate your feedback on Simon's email. Before proceeding with the extensive VMT exercise, we seek your confirmation that you agree with the proposed approach. Please respond to Simon's email dated September 22, 2025, at your earliest convenience. The Glassell project is a large investment for our team, and it is imperative that we keep it moving forward.

Thank you,

From: Simon Lin <slin@epdsolutions.com>
Sent: Monday, September 29, 2025 4:51 PM
To: Luis Gomez <lgomez@rexfordindustrial.com>; Maria Prado Flores <mpflore@cityoforange.org>; Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>
Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Brandon Wolfe <brandon@epdsolutions.com>; Jon Tanury <jtanury@rexfordindustrial.com>
Subject: RE: VMT Screening Memo 2411 Glassell St Warehouse Project

EXTERNAL EMAIL: Exercise caution before clicking attachments/links.

Hi [@Larry Tay](#) and [@Delia Votsch](#),

I am following up again to ensure the project continues to move forward. Could you please confirm your concurrence with the approach detailed in the email below?

Please don't hesitate to reach out if you need anything else from our team.

Thanks,

Simon Lin, EIT | Assistant Transportation Planner

slin@epdsolutions.com

805.471.5232 | cell

3333 Michelson Drive | Suite 500 | Irvine, CA 92612

www.epdsolutions.com

How did we do today? Please let us know by answering this short [Survey!](#)

E | P | D SOLUTIONS, INC

From: Luis Gomez <lgomez@rexfordindustrial.com>

Sent: Thursday, September 25, 2025 8:00 AM

To: Simon Lin <slin@epdsolutions.com>; Maria Prado Flores <mpflores@cityoforange.org>; Larry Tay <ltay@cityoforange.org>; Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie Adourian <nadourian@cityoforange.org>

Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani <ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>; Sacheen Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar <tkalaskar@epdsolutions.com>; Brandon Wolfe <brandon@epdsolutions.com>; Jon Tanury <jtanury@rexfordindustrial.com>

Subject: Re: VMT Screening Memo 2411 Glassell St Warehouse Project

[NON-EPD]

Dear City Team,

I hope this message finds you well. I am writing to follow up on the email sent by EPD earlier this week. We are eager to keep this project progressing and would greatly appreciate your feedback on the proposed VMT approach. We look forward to hearing from you soon.

Thank you,

LUIS GOMEZ
Vice President, Development
424.465.2061 (d)
lgomez@rexfordindustrial.com
rexfordindustrial.com | NYSE: REXR

Rexford Industrial Realty, Inc.
11620 Wilshire Blvd., Suite 1000
Los Angeles, CA 90025

Monthly Charity Partner



From: Simon Lin <slin@epdsolutions.com>
Sent: Monday, September 22, 2025 12:36 PM
To: Maria Prado Flores <mpflores@cityoforange.org>; Larry Tay <ltay@cityoforange.org>;
Delia Votsch <d.votsch@fehrandpeers.com>; Nathalie Adourian
<nadourian@cityoforange.org>; Luis Gomez <lgomez@rexfordindustrial.com>
Cc: Hayden Beckman <hbeckman@cityoforange.org>; Ryan Agbayani
<ragbayani@cityoforange.org>; Gabrielle Hayes <ghayes@cityoforange.org>; Meghan
Macias <meghan@epdsolutions.com>; Danielle Thayer <Danielle@epdsolutions.com>;
Sacheen Premaratne <sacheen@epdsolutions.com>; Tanya Kalaskar
<tkalaskar@epdsolutions.com>; Brandon Wolfe <brandon@epdsolutions.com>; Jon Tanury
<jtanury@rexfordindustrial.com>
Subject: RE: VMT Screening Memo 2411 Glassell St Warehouse Project

EXTERNAL EMAIL: Exercise caution before clicking attachments/links.

Hi City of Orange team,

Thanks again for meeting with us last Thursday.

Below please find requested information from the meeting last week:

1. Based on the SCAG [SCS](#), employees for the existing and proposed uses have been calculated based on the following:

For the existing three buildings onsite totaling 191,127 SF, employment category "Office Services (Suburban)" which would yield 1 employee per 350 SF is used

1. the existing buildings onsite would represent **547 service employees in the "No Project" scenario** of OCTAM

For the proposed building consisting of 189,988 SF of warehouse and 109,000 SF of manufacturing, employment category "Transportation and warehousing (Suburban)" which would yield 1 employee per 1700 SF and employment category "Manufacturing (Suburban)" which would yield 1 employee per 650 SF are used

1. the proposed building would represent 112 warehouse employees and 168 manufacturing employees, or **280 total basic employees in the "Plus Project" scenario** of OCTAM, or a net reduction of 267 employees
2. As documented in the previously submitted VMT screening memo, the trip generation of the proposed project would be a net reduction from the existing building.
3. Per our discussion during the call, to document the change in VMT with the Project, the following four model runs were suggested:

2019 No Project model run, with 547 service employees isolated in Project TAZ (TAZ 570)

2019 Plus Project model run, with 280 basic employees isolated in Project TAZ (TAZ 570)

2050 No Project model run, with 547 service employees isolated in Project TAZ (TAZ 570)

2050 Plus Project model run, with 280 basic employees isolated in Project TAZ (TAZ 570)

1. If **TOTAL VMT** is less under the Plus Project scenario compared to the No Project scenario, this would provide **substantial evidence** that the Project would result in a less than significant VMT impact.

Per the [LCI \(formerly OPR\) technical advisory](#), **“Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact.”**

1. Additionally, it was mentioned on the call that the TIA scoping agreement is approved. We checked the portal this morning and still yet to see the approved TIA scoping agreement. We are proceeding on the TIA with the verbal confirmation of the approval. Please provide the formal approval document for our record.

This approach requires substantially more effort than a typical VMT screening analysis. We estimate that two weeks would be required to complete this analysis. To ensure that the project continues to move forward, please provide your concurrence with this approach.

We would really appreciate a response by end of day Wednesday 9/24.

Thanks,

Simon Lin, EIT | *Assistant Transportation Planner*

slin@epdsolutions.com

805.471.5232 | cell

3333 Michelson Drive | Suite 500 | Irvine, CA 92612

www.epdsolutions.com

How did we do today? Please let us know by answering this short [Survey!](#)

-----Original Appointment-----

From: Maria Prado Flores <mpflores@cityoforange.org>

Sent: Monday, September 15, 2025 10:44 AM
To: Maria Prado Flores; Brandon Wolfe; Larry Tay; Delia Votsch; Nathalie Adourian; Simon Lin; lgomez@rexfordindustrial.com
Cc: Hayden Beckman; Ryan Agbayani; Gabrielle Hayes
Subject: VMT Screening Memo 2411 Glassell St Warehouse Project
When: Thursday, September 18, 2025 8:30 AM-9:00 AM (UTC-08:00) Pacific Time (US & Canada).
Where: Microsoft Teams Meeting

[NON-EPD]

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

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Passcode: A85ao3Kn

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For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

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APPENDIX B – OCTAM INPUTS AND OUTPUTS

Model Run SED	2411 Glassell Project, Orange		
TAZ	570		
Employment Category	Office Service	Warehouse (Basic)	Manufacturing (Basic)
Square Footage to Add	0	189,886	109,000
Square Footage to Remove	191,127	0	0
SP Footage ¹	300	1700	600
Total Employee to add to TAZ	0	112	168
Total Employee to reduce from TAZ	547	0	0

¹ SCAG Connect SoCal SCS

TABLE 6 Building Square Footage Factors for Residential Units and Employment by Type

BUILDING TYPE	SUBURBAN SQFT/UNIT	URBAN SQFT/UNIT
RESIDENTIAL		
Small Lot Detached Single Family	2,400	1,650
Large Lot Detached Single Family	3,000	2,100
Attached Single Family	1,800	1,800
Multifamily 2 to 4 units	2,000	1,850
Multifamily 5 plus units	1,200	1,200
COMMERCIAL		
SUBURBAN SQFT/EMPLOYEE		
Retail Services	750	475
Accommodation	2,000	1,850
Restaurant	750	475
Entertainment and Recreation	1,200	900
Other Services	850	650
Office Services	350	280
Education	1,050	900
Medical and Health Services	800	725
Public Administration	700	620
Manufacturing	650	575
Transportation and Warehousing	1,700	1,200
Utilities	350	275
Wholesale	650	600
Construction	400	275

Source: SCAG

