

To: City of Torrance
From: Sina Salehipour, Jordan Mower, Chad Karns, EPD Solutions Inc
Date: 11/24/2025
Site: 21151, 21171, and 21221 S Western Avenue, Torrance, CA 90501
Subject: Vehicle Miles Traveled (VMT) Screening Analysis
Torrance Townhomes -EPD#25-033

This technical memorandum presents an evaluation of a proposed development consisting of 335 residential units (Project) located at 21151, 21171, and 21221 S Western Avenue in the City of Torrance. The purpose of this analysis is to determine if a Vehicles Miles Traveled Analysis (VMT) would be required for the Project. The Project site encompasses approximately 7.82 acres and includes Assessor's Parcel Numbers (APNs) 7355-032-010 through -012.

This memo evaluates the Project using the City of Torrance Traffic Impact Assessment (TIA) Guidelines for Land Use Projects (January 2021).

Project Description

The proposed Project is anticipated to demolish 145,420 SF of office uses and develop 335 residential units. The residential units will be developed within two sub-areas, one developed with 98 four-story townhome units, and one featuring 237 condominium units within a six-story building. The Project results in an average net density of 43 dwelling units per acre (du/ac) across the Project site. The proposed Project site plan is shown in *Figure 1: Project Site Plan*. The Project would also include construction of two driveway entrances; one from Torrance Boulevard and one from S Western Avenue.

Implementation of the proposed Project requires a General Plan Amendment and zone change from General Plan Land Use Designation from I-BP to Medium High Density Residential (R-MH) and zoning from M1 to Planned Development District (P-D). The Project is requesting approval of a Planned Development to establish its own development standards which would include 674 parking stalls and a FAR of 1.91 (Lot A 1.17, Lot B 3.76). The R-MH land use designation allows low- and medium-rise multi-unit buildings within a density range of 31.1 to 44 dwelling units per acre. The project also requires Modification of the approved CUP85-32, Conditional Use Permit to Allow Residential Development.

Project Trip Generation

The Project trip generation was prepared using trip rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition (2021). The existing 145,420 SF office use was analyzed using General Office Building (ITE Land Use Code 710). The proposed 98 four-story townhome was analyzed as Single-Family Attached Housing (ITE Land Use Code 215) and the 237 Condominium Units Within six-Story Building were analyzed as Multifamily Housing (Mid-Rise) (ITE Land Use Code 221).

Table 1: Project Trip Generation presents the trip generation estimates for both the existing use and the proposed Project. As shown in Table 1, the existing site is estimated to generate a total of 1,576 daily trips, including 221 trips during the AM peak hour and 209 trips during the PM peak hour. The proposed Project is projected to generate 1,782 daily trips, with 135 AM peak hour trips and 148 PM peak hour trips.

Considering the credit from the existing use, the Project is estimated to generate net 206 daily trips, net 86 fewer AM, and net 61 fewer PM peak hours trips.

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.

For a project to apply any of the VMT screening thresholds provided in the City's Traffic Impact Analysis (TIA) Guidelines, the project must first be evaluated for consistency with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). If a project is deemed to be inconsistent with the Southern California Association of Governments (SCAG) RTP/SCS, the project must be evaluated to determine whether that inconsistency indicates a significant impact on transportation.

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 (2024–2050 Regional Transportation Plan/Sustainable Communities Strategy; adopted April 2024), as shown in Table 3. The SCAG Data/Map Book land use designations are provided in Attachment A.

Section 3.2 of the City's TIA Guidelines provide VMT screening thresholds to identify projects that would be considered to have a less-than significant impact on VMT and therefore could be screened out from further analysis. If a project is consistent with the SCAG RTP/SCS, and meets one of the following criteria, its VMT impact would be considered less than significant, and no further VMT analysis would be required:

1. The project is a small project (net increase of 110 or less daily trips).
2. The project is a residential or office project in a low VMT generating area.
3. The project is located within one-half mile of either an existing major transit stop or an existing stop along an existing high quality transit corridor.
4. The project has 100% affordable housing units.
5. The project contains a retail use of 50,000 sf or less.
6. The project is a locally serving public facility.

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

Screening Criteria 1 – Small Projects: According to the City's guidelines, projects which would generate fewer than 110 average daily trips (ADT) would not cause a substantial increase in the total citywide or regional VMT. As shown in *Table 1: Project Trip Generation*, the Project would generate a net total of 206 daily trips. Therefore, the Project generates more than 110 average daily trips (ADT) and does not meet Screening Criteria 1 – Small Projects.

Screening Criteria 2 – Map-Based Screening for Residential and Office Projects: The City's guidelines include maps identifying areas with low VMT generation for residential and office projects. To satisfy this criterion, a project must exhibit similar characteristics to existing parcels within the same Traffic Analysis Zone (TAZ). The Project was determined to be consistent with the existing TAZ in which it is located, upon review from the City of Torrance Community Development Department Planner, as shown in Attachment B. The Project site is currently operating as an office use; however, the proposed Project would introduce residential land use. As shown in Figure 2, which illustrates low VMT areas per employee, the existing office use is not located within a low VMT generation area. Conversely, as shown in Figure 3, which illustrates low VMT areas per capita, the proposed residential Project is located within a low VMT generation area. Therefore, the Project satisfies Screening Criteria 2 – Map-Based Screening for Residential and Office Projects.

Screening Criteria 3 – Proximity to Transit: According to the City’s guidelines, projects within one-half mile of either an existing major transit stop or an existing stop along an existing high quality transit corridor may be presumed to have a less than significant impact. Based on *Figure 2 – Transit Priority Area Map* provided in the City’s guidelines, the Project is within a High-Quality Transit area, however, there are four limiting factors that if a project has at least one of them then this criteria cannot be utilized. As shown in *Table 2: Proximity to Transit Factors*, the Project does not have any of the limitations mentioned; therefore, the Project would satisfy Screening Criteria 3 – Proximity to Transit.

It should be noted that, while the proposed Project is not consistent with the existing general plan land use designation of Business Park, which assumed the site would be constructed as a mixed commercial and industrial development, the Project site is located within a Neighborhood Mobility Area as well as a Livable Corridor. Neighborhood Mobility Areas (NMAs) are areas that focus on creating, improving, restoring and enhancing safe and convenient connections to schools, hospitals, shopping, services, places of worship, parks, greenways and other destinations. Livable Corridors are areas where local jurisdictions may plan and zone for increased density at nodes along key corridors, and to “redevelop” single-story under-performing retail with well-designed, higher density housing and employment centers. Growth at strategic nodes along key corridors, many of which are within High Quality Transit Corridors (HQTCs), will make transit a more convenient and viable option. Connect SoCal recognizes that development within Priority Growth Areas, including TPAs, NMAs and livable corridors, supports mode shift and shortened trip distances. The Project site is within an identified Priority Growth Area, where urban development can contribute to reduced VMT and associated emissions. The Project would implement development to achieve an urban character and is consistent with the land uses assumed for the Project site as part of the RTP/SCS.

Furthermore, SCAG’s Connect SoCal 2020-2045 RTP/SCS integrates strategies for land use and transportation centered around sustainability, protecting and preserving existing transportation infrastructure, increasing capacity through improved systems managements, and providing more transportation choices, in order to help reduce greenhouse gas (GHG) emissions from transportation. The Project’s consistency, with the RTP/SCS can be evaluated based on the applicable goals mentioned in Table 3 and was determined to be consistent upon review from the City of Torrance Community Development Department Planner, as shown in Attachment C. As shown on Table 3, the proposed Project is consistent with the RTP/SCS.

Screening Criteria 4 – Affordable Residential Development: According to the City’s guidelines, residential projects with 100% affordable housing units may be presumed to have a less than significant impact. The proposed Project does not include affordable residential development; therefore, it does not satisfy Screening Criteria 4 – Affordable Residential Development.

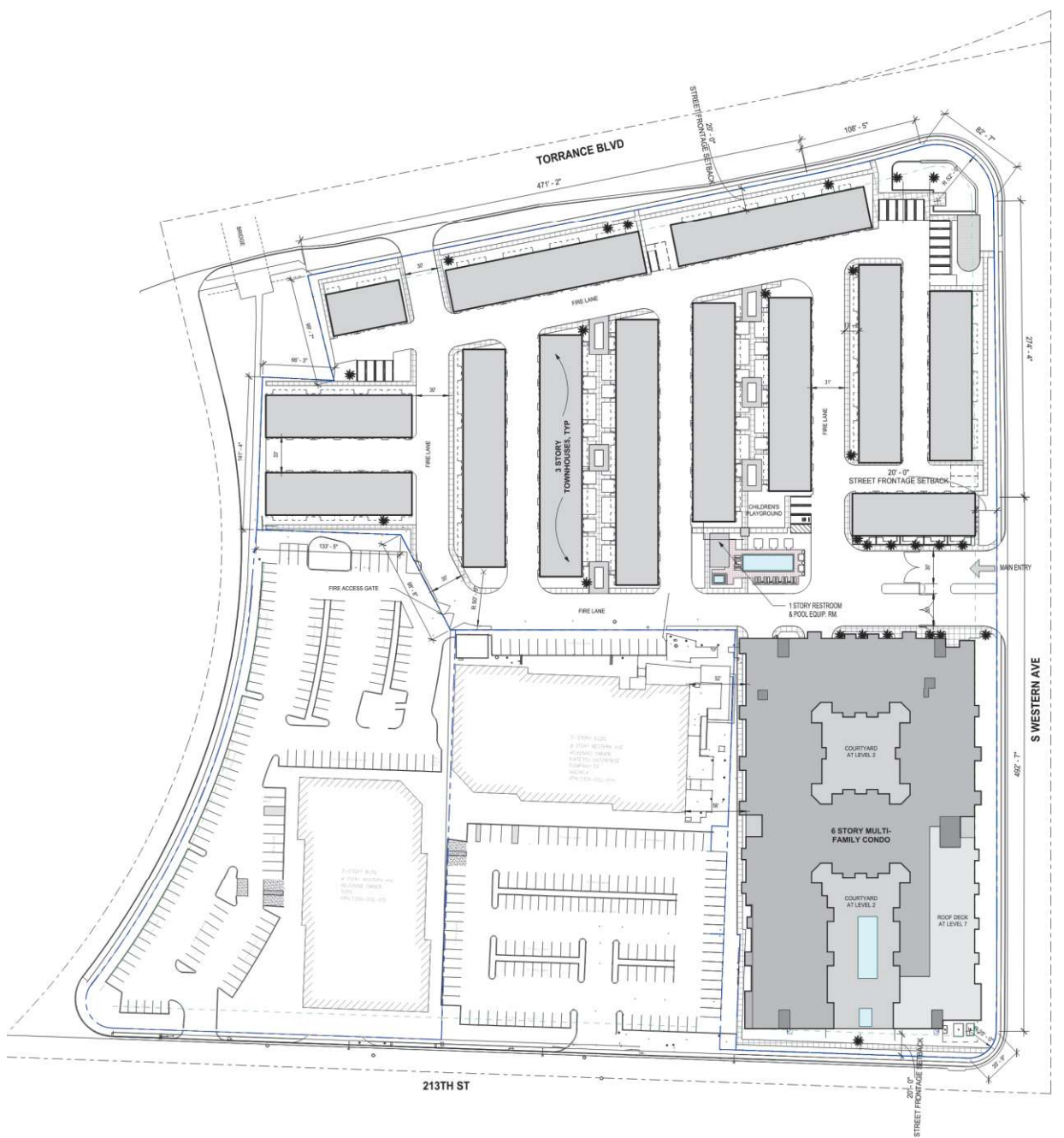
Screening Criteria 5 – Local-Serving Retail: According to the City’s guidelines, retail uses of 50,000 sf or less may be presumed to have a less than significant impact. The Project is not a retail development; therefore, it does not satisfy Screening Criteria 5 – Local-Serving Retail.

Screening Criteria 6 – Local-Serving Public Facility: According to the City’s guidelines, local-serving public facilities may be presumed to have a less than significant impact. The Project is not a public facility; therefore, it does not satisfy Screening Criteria 6 – Local-Serving Public Facility.

Summary

The Project was evaluated using the City’s TIA Guidelines thresholds to determine if a VMT analysis is required. The City’s guidelines identify six screening criteria. Screening Criteria 1 (Small Projects) and Criteria 4 (Affordable Residential Development), 5 (Local-Serving Retail), and 6 (Local-Serving Public Facility) were not met. However, Screening Criteria 2 and 3 were satisfied, as the Project site is located within a low VMT generation area (based on the residential low VMT area generation City’s map) and within a TPA. Therefore, the Project meets the City’s VMT screening criteria and is presumed to have a less-than-significant VMT impact.

Figure 1: Project Site Plan



Source: MVE+ PARTNERS

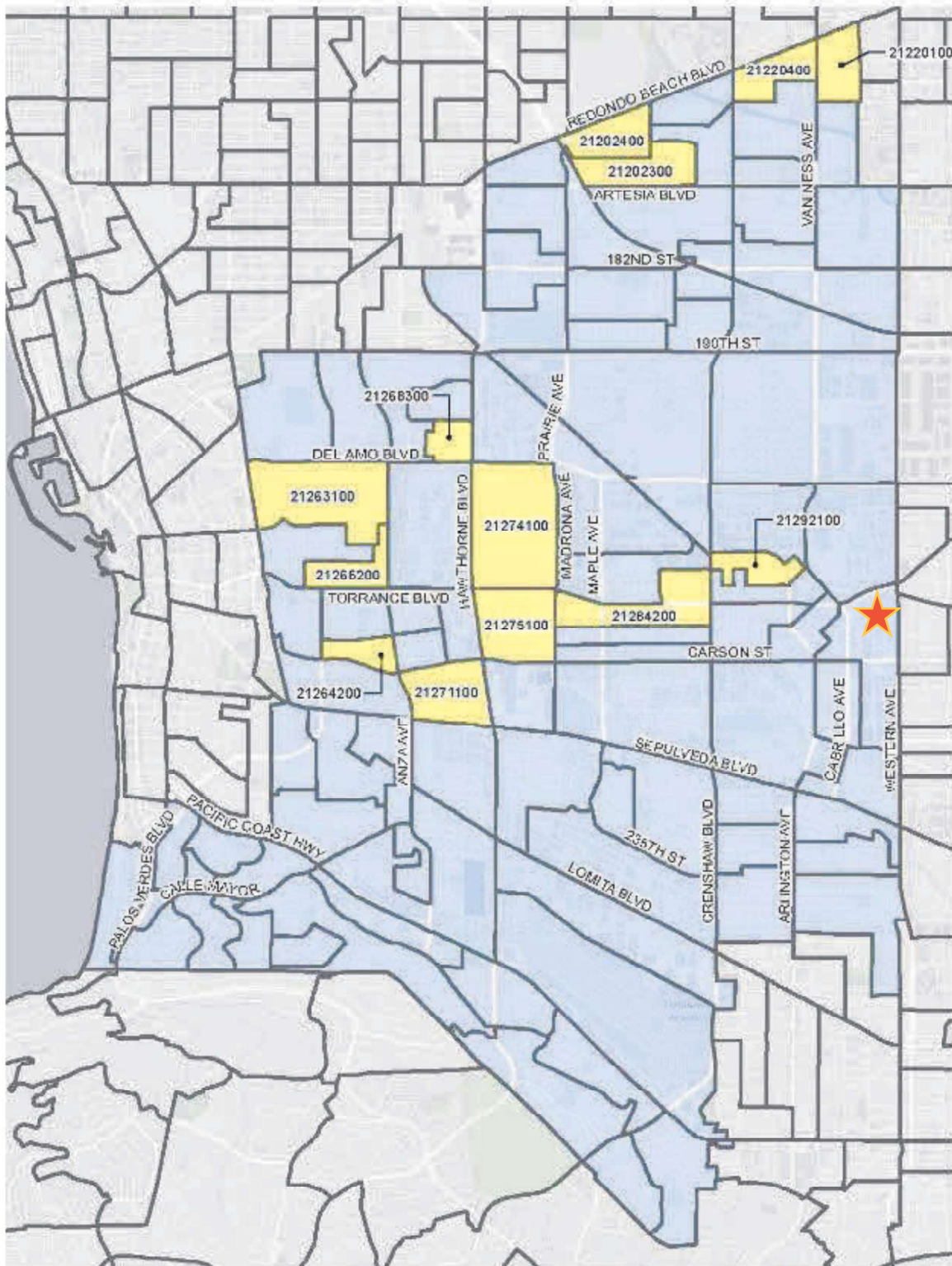
Table 1: Project Trip Generation

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
Trip Rates									
General Office Building ¹	1000 Sq. Ft. GFA	10.84	1.34	0.18	1.52	0.24	1.20	1.44	
Single-Family Attached Housing ²	Dwelling Units	7.20	0.15	0.33	0.48	0.32	0.25	0.57	
Multifamily Housing (Mid-Rise) ³	Dwelling Units	4.54	0.09	0.28	0.37	0.24	0.15	0.39	
Project Trip Generation									
Existing Project Trip Generation									
Existing Office Building ¹	145,420	1000 Sq. Ft. GFA	1576	194	27	221	36	173	209
Proposed Project Trip Generation									
Proposed 4-Story Townhome ²	98	Dwelling Units	706	15	32	47	32	24	56
Proposed Condominium Units Within 6-Story Building ³	237	Dwelling Units	1076	20	68	88	56	36	92
Total Existing Trip Generation			1576	194	27	221	36	173	209
Total Project Trip Generation			1782	35	100	135	88	60	148
Total Net New Trip Generation			206	-159	73	-86	52	-113	-61

¹Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021. Land Use Code 710 - General Office Building (Average Rate)²Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021. Land Use Code 215 - Single-Family Attached Housing (Average Rate)³Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021. Land Use Code 221 - Multifamily Housing (Mid-Rise) (Average Rate)**Table 2: Proximity to Transit Factors**

Transit-based screening criteria cannot be utilized if a project meets one of the following limiting factors:	Criteria Met
Has a Floor Area Ratio (FAR) of less than 0.75	No
Includes more parking for use by residents, customers, or employees of the project than required by the City (if on-site parking is required)	No
Is inconsistent with the 2020-2045 SCAG RTP/SCS	No
Replaces affordable residential units with a smaller number of moderate- or high-income residential units, i.e., the total number of existing lower income housing units is greater than the total number of lower income and market-rate residential units proposed by the project	No

Figure 2: TAZ Within Low VMT Area – Office Projects

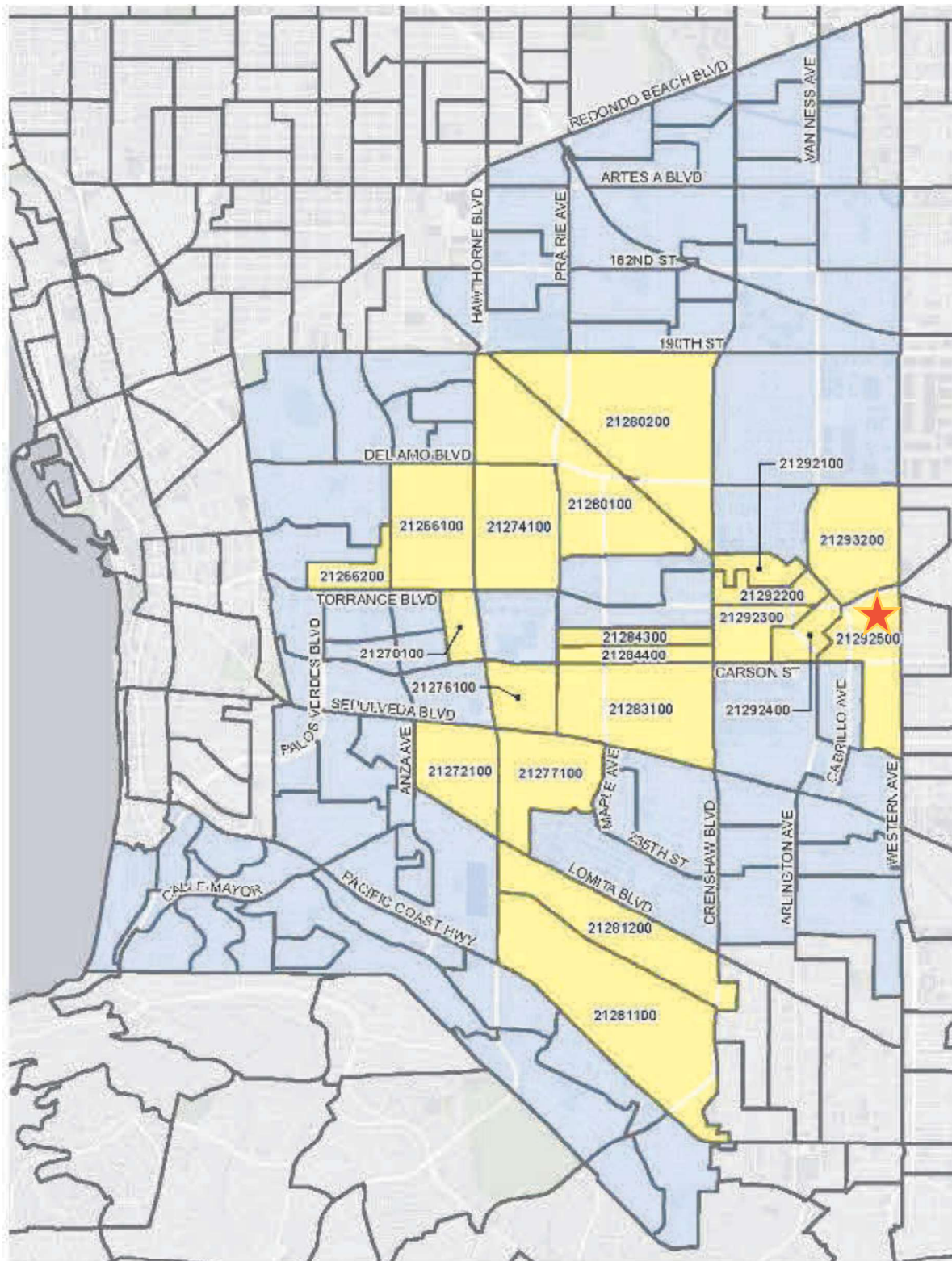


TAZs with Low VMT (85% or less than 2021 LA County Average) per Employee



Project Location

Figure 3: TAZ Within Low VMT Area – Residential Projects



TAZs with Low (85% or less than 2021 LA County Average) VMT per Capita



Project Location

Figure 4: Transit Priority Area Screening



Project Location

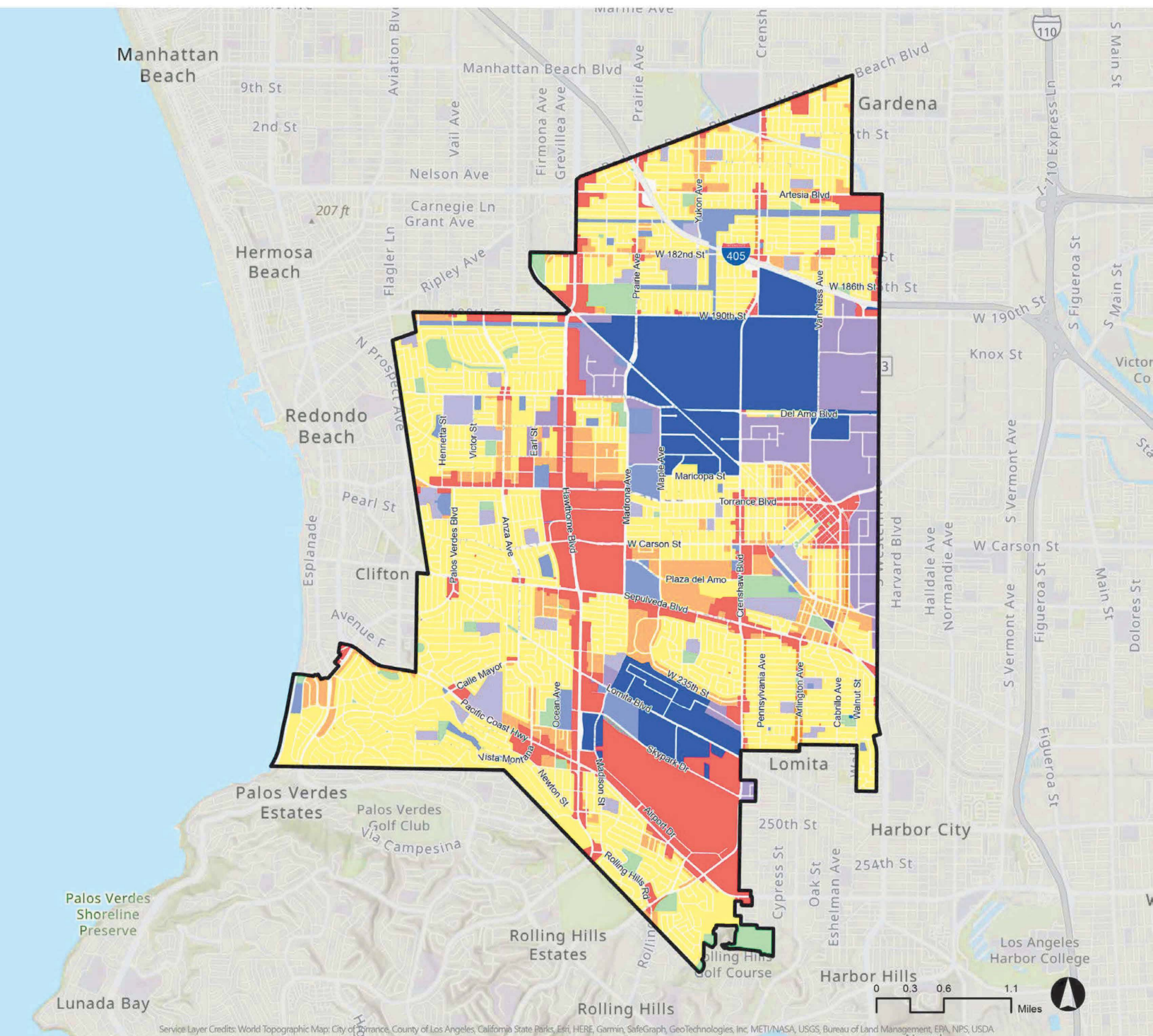
Table 3: Project Consistency with 2024 SCAG Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy Policies

2024 Connect SoCal Strategy/Policy	Project Consistency with Policy
Complete Streets	
Support implementation of Complete Streets demonstrations (including those addressing curb space management) to accommodate and optimize new technologies and micromobility devices, first/last mile connections to transit and last-mile deliveries	Not Applicable. This is not a project-specific goal and is therefore not applicable.
Support community-led Complete Streets plans and projects, including those that take into account how to mitigate or adapt to climate change impacts (e.g., extreme heat)	Not Applicable. This is not a project-specific goal and is therefore not applicable.
Transit and Multimodal Integration	
Increase multimodal connectivity (e.g., first/last mile transit and airport connections), which includes planning for and developing mobility hubs throughout the SCAG region	Consistent. The Project includes residential and recreational development located near commercial, retail, and office uses, which encourages residents to use alternative modes of transportation for local commute. The Project is located near 6 established public transit bus stops within 0.5 miles of the Project site and would promote an active lifestyle. The site is served by lines 1, 3, R3, and 4X, which connect the Project site to Long Beach to the south and Downtown Los Angeles to the north.
Through land use planning, support residential development along high-frequency transit corridors and around transit/rail facilities and centers	Consistent. As described above, the Project is located near 6 established public transit bus stops within 0.5 miles of the Project site and would promote an active lifestyle. The site is served by lines 1, 3, R3, and 4X, which connect the Project site to Long Beach to the south and Downtown Los Angeles to the north.
Expand the region's networks of bicycle and pedestrian facilities. This includes creating more low stress facilities, such as separated bikeways and bike paths, slow streets, and open streets	Consistent. The Project would improve the existing sidewalk along Western Avenue and Torrance Boulevard and would connect to other existing walkways and public transit in the area.
Safety	
Work with local, state and federal partners to advance safer roadways, including reduced speeds to achieve zero deaths and reduce GHGs	Not Applicable. This is not a project-specific goal and is therefore not applicable.
Priority Development Areas	
Support the development of housing in areas with existing and planned infrastructure and availability of multimodal options, and where a critical mass of activity can promote location efficiency	Consistent. The Project includes residential development within a residential area. The Project site is located near commercial, retail, and office uses, which encourages residents to use alternative modes of transportation for local commute. Further, the proposed Project would improve the existing sidewalk along Western Avenue and Torrance Boulevard and would connect to other existing walkways and public transit in the area. Additionally, as described above, the Project is located near 6 established public transit bus stops within 0.5 miles of the Project site and would promote an active lifestyle. The site is served by lines 1, 3, R3, and 4X, which connect the Project site to Long Beach to the south and Downtown Los Angeles to the north.
Housing the Region	

2024 Connect SoCal Strategy/Policy	Project Consistency with Policy
Provide technical assistance for jurisdictions to complete and implement their housing elements and support local governments and Tribal Entities to advance housing production	Not Applicable. This is not a project-specific goal and is therefore not applicable.
Identify and pursue partnerships at the local, regional, state and federal levels to align utility, transit and infrastructure investments with housing development and equitable outcomes across the region	Not Applicable. This is not a project-specific goal and is therefore not applicable.
Sustainable Development	
Research the availability of resources that can support the development of water and energy-efficient building practices, including green infrastructure	Not Applicable. This is not a project-specific goal and is therefore not applicable.
Air Quality	
Coordinate with local, regional, state and federal partners to meet federal and state ambient air-quality standards and improve public health	Consistent. The Project would meet existing ambient air-quality standards.
Clean Transportation	
Support the deployment of clean transit and technologies to reduce greenhouse gas emissions as part of the CARB innovative clean technology (ICT) rule	Consistent. The CARB innovative clean technology (ICT) rule requires all public transit agencies to gradually reduce fleet vehicle tailpipe emissions and encourages them to provide innovative first and last-mile connectivity and improved mobility for transit riders. The Project would implement sidewalks and bike facilities to encourage alternative uses of transport other than passenger vehicles. While the Project is not adjacent to transit facilities, the Project is located near established public transit and would promote an active lifestyle.
Natural and Agricultural Lands Preservation	
Work with implementation agencies to support, establish or supplement voluntary regional advance mitigation programs (RAMP) for regionally significant transportation projects to mitigate environmental impacts, reduce per-capita VMT and provide mitigation opportunities through the Intergovernmental Review Process	Not Applicable. The Project would not be considered a regionally significant transportation Project and is therefore not applicable.
Continue efforts to support partners in identifying priority conservation areas—including habitat, wildlife corridors, and natural and agricultural lands—for permanent protection	Consistent. The proposed Project site is currently developed with commercial office buildings and does not provide suitable habitat for wildlife.
Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, protection of wetlands, habitat and wildlife corridor restoration, greenway connectivity and similar efforts	Consistent. See above regarding protection of biological resources.
Climate Resilience	
Develop partnerships and programs to support local and regional climate adaptation, mitigation and resilience initiatives	Not Applicable. This is not a project-specific goal and is therefore not applicable.
Support implementing agencies' efforts to include climate-ready home-hardening strategies in new	Consistent. the Project would be required to comply with all California Fire Code (CFC) regulations as well as the City of

2024 Connect SoCal Strategy/Policy	Project Consistency with Policy
construction as well as the retrofitting of existing structures to minimize the potential loss of housing units stemming from climate-related hazards	Torrance Municipal Code Chapter 85.1.010, which provide requirements to reduce the potential of fires that include minimum access road widths, automatic motorized gates, installation of automatic sprinkler systems, and fire hydrant sizing (the quantity of water available for fire-protection purposes).
Collaborate with partners to foster adoption of systems and technologies that can reduce water demand and/or increase water supply, such as alternative groundwater recharge technologies, stormwater capture systems, urban cooling infrastructure and greywater usage systems	Consistent. The proposed Project would be required to implement water-efficient landscaping and water conserving appliances pursuant to the City's Municipal Code Division 4 Chapter 10, <i>Stormwater and Urban Runoff Pollution Control</i> . Compliance would be reviewed by the City during the permitting process. Additionally, the new onsite water system would convey water supplies to the proposed buildings and landscaping through plumbing/landscaping fixtures that are compliant with the CALGreen Code for efficient use of water.
Workforce Development	
Provide technical assistance to help local jurisdictions realize their economic and workforce-development goals	Not Applicable. This is not a project-specific goal and is therefore not applicable.
Encourage the growth of, and equitable access to, living-wage jobs throughout the region	Consistent. The proposed Project would provide temporary jobs during construction. However, the Project is residential in nature and does not propose any development which would result in new employment opportunities.

ATTACHMENT A – SCAG DATA/MAP BOOK LAND USE DESIGNATIONS



2019 General Plan Land Use in City of Torrance (SCAG Land Use Codes)



Data Source: City of Torrance, SCAG | Data Updated: 2023 | Map Created: 9/6/2023

Disclaimer: This map was created as a part of SCAG Data/Map Books to solicit feedback from local jurisdictions during Connect SoCal 2024 Local Data Exchange (LDX) process. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the data sources, methodologies and contents of this map, please refer to the SCAG Data/Map Book or contact LIST@scag.ca.gov. Please note that data sourced from local general plan land use represents an approximation of local conditions as of 2019. For authoritative data on these subjects, please contact the respective local jurisdiction directly.

ATTACHMENT B –CITY CONCURRENCE ON SIMILAR CHARACTERISTICS



Outlook

Concurrence on Project Similar Features within TAZ 21292500

From Oorts, Leo <LOorts@TorranceCA.Gov>

Date Mon 11/24/2025 12:24 PM

To Tatiana Torres <ttores@epdsolutions.com>

Hi Tatiana,

The purpose of this email is to provide a determination from the Planning Division on whether a proposed project will have similar features as the existing parcels within a Transportation Analysis Zone (TAZ).

The proposed residential project is located within TAZ 21292500 near the southwest corner of Western Avenue and Torrance Boulevard at 21151, 21171, 21221 Western Avenue. The project involves the demolition of three professional office buildings (145,420 square feet) and the development of 335 residential units. The residential units will be developed within two sub-areas, one developed with 98 four-story townhome units, and one featuring 237 condominium units within a six-story building. The project results in an average net density of 43 dwelling units per acre (du/ac) across the site.

Based on review of the City of Torrance Traffic Impact Assessment Guidelines (TIA Guidelines, January 2021) and the Vehicle Miles Traveled (VMT) Screening Analysis Torrance Townhomes (EPD#25-033), the Planning Division concurs that the proposed residential project will have similar features as the existing parcels within TAZ 21292500. As described in Section 3.2.3 of the TIA Guidelines, residential projects located in a low-VMT TAZ that incorporate comparable attributes, such as density, mix of uses, and transit accessibility, are expected to exhibit similarly low VMT generation. The project is located within a designated low-VMT area and within proximity to a high-quality transit corridor. Therefore, the project satisfies these criteria and is anticipated to demonstrate comparable travel behavior and trip generation patterns to those of surrounding uses within TAZ 21292500.

Please let me know if you have any questions.

Thank you,

LEO OORTS

Senior Planner - Community Development Department

310-618-5925 | LOorts@TorranceCA.Gov

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ATTACHMENT C – CITY CONCURRENCE ON SCAG RTP/SCS CONSISTENCY



Outlook

Project Consistency with SCAG – RTP/SCS

From Oorts, Leo <LOorts@TorranceCA.Gov>

Date Mon 11/24/2025 12:25 PM

To Tatiana Torres <ttorres@epdsolutions.com>

Hi Tatiana,

The purpose of this email is to provide a determination from the Planning Division on whether a proposed project is consistent with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as contained in the Southern California Association of Governments (SCAG) adopted Connect SoCal (2024–2050 Regional Transportation Plan/Sustainable Communities Strategy; adopted April 2024).

The proposed residential project is situated near the southwest corner of Western Avenue and Torrance Boulevard on properties that have a zoning designation of M-1 Zone (Light Manufacturing District) and a land use designation of I-BP (Business Park), located at 21151, 21171, 21221 Western Avenue. The project involves the demolition of three professional office buildings (145,420 square feet) and the development of 335 residential units, in conjunction with a General Plan Amendment (GPA) to amend the land use designation from Business Park (I-BP) to Medium High Density Residential (R-MH), and a Zone Change (ZON) to amend the zoning designation from Light Manufacturing District (M-1 Zone) to Planned Development District (PD Zone). The residential units will be developed within two sub-areas, one developed with 98 four-story townhome units, and one featuring 237 condominium units within a six-story building. The project results in an average net density of 43 dwelling units per acre (du/ac) across the site.

Based on review of the City of Torrance Traffic Impact Assessment Guidelines (TIA Guidelines, January 2021) and the Vehicle Miles Traveled (VMT) Screening Analysis Torrance Townhomes (EPD#25-033), the Planning Division concurs that the proposed residential project is consistent with the 2024-2050 SCAG – RTP/SCS.

Please let me know if you have any questions.

Thank you,

LEO OORTS

Senior Planner - Community Development Department

310-618-5925 | LOorts@TorranceCA.Gov

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