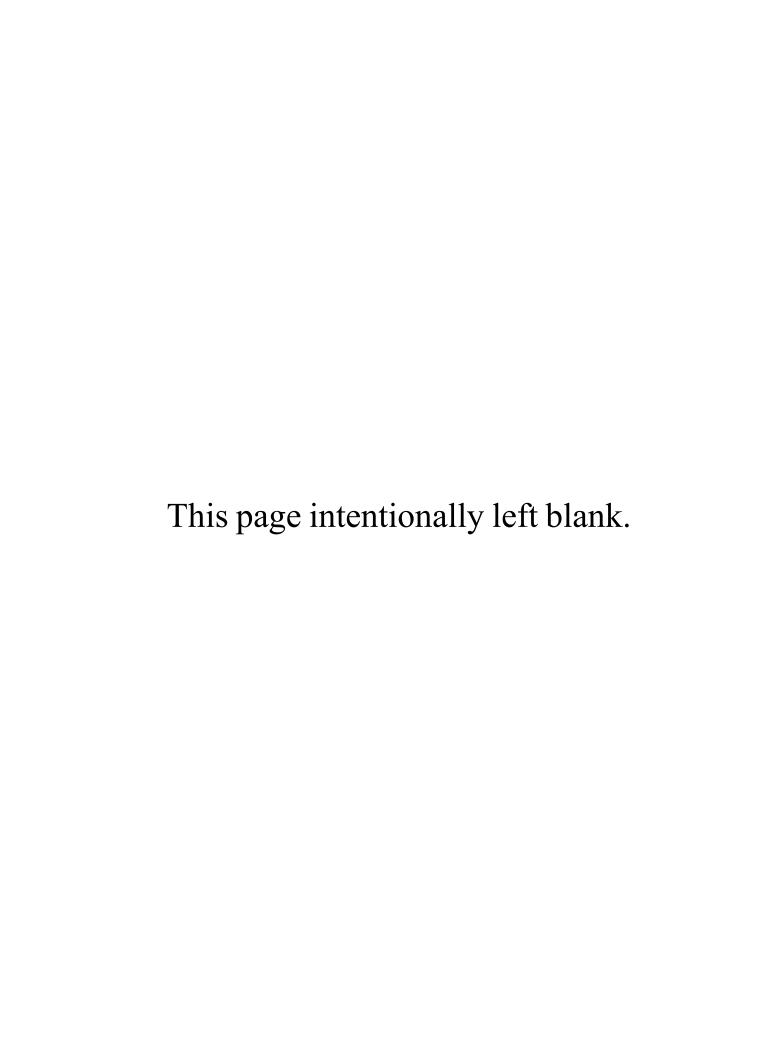
Exhibit D







Memorandum



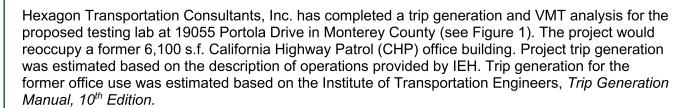
Date: July 9, 2020

To: Mr. Will Daniels, IEH Laboratories & Consulting Group, Inc.

From: Gary Black, Tim Chang

Subject: Trip Generation and VMT Analysis for the Proposed Testing Lab at 19055 Portola

Drive in Monterey County



Project Trip Generation

Based on information provided by IEH, the proposed testing lab would have approximately 25 employees, and would generate an average of 26 daily vehicle trips for sample delivery (13 inbound and 13 outbound). According to IEH, about many of the employees at a similar lab in Salinas carpool, with an average of two employees per vehicle on site. Assuming that 24 of the employees form two-person carpools, and 1 employee drives alone, the project is expected to generate 26 daily vehicle trips from employees (13 inbound and 13 outbound) and 26 daily vehicle trips for sample delivery, for a total of 52 daily vehicle trips.

Applying the trip generation rates provided in the ITE *Trip Generation Manual, 10th Edition*, a typical 6,100 s.f. office building is expected to generate 59 daily vehicle trips (see Table 1). This conservatively underestimates the daily vehicle trips because it does not account for officers going in and out on patrol.

Table 1
Trip Generation Estimates

perations 6.1	ksf	0.74	52
6.1	kef	0.74	
	V2I	9.74	59
			-7
	Office Buildi	Office Building (Lan	ates published in the <i>ITE Tri</i> Office Building (Land Use C













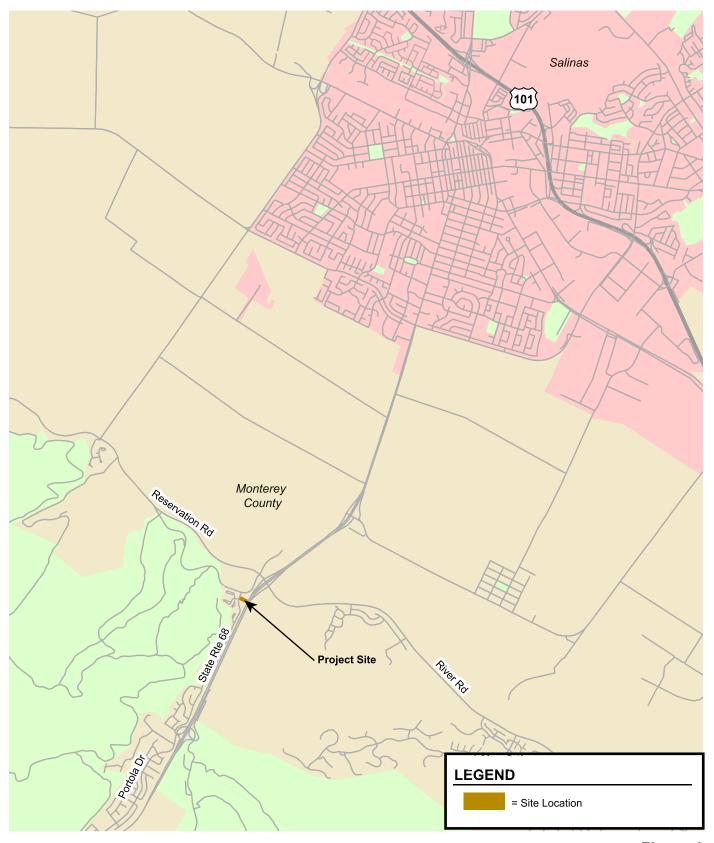


Figure 1 Site Location





Based on the information above, the proposed project is expected to generate 7 fewer daily vehicle trips compared to the former California Highway Patrol office on the site.

VMT Analysis

Pursuant to SB 743, the CEQA 2019 Update Guidelines Section 15064.3, subdivision (b) states that vehicle miles travelled (VMT) will be the metric in analyzing transportation impacts for land use projects for CEQA purposes. The *Technical Advisory on Evaluating Transportation Impacts in CEQA* published by the Governor's Office of Planning and Research (OPR) in December 2018 provides recommendations regarding VMT evaluation methodology, significance thresholds and screening thresholds for land use projects. The following OPR screening threshold is relevant to the project:

 "Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact."

Because the project is expected to generate fewer than 110 trips per day, it can be presumed to have a less-than-significant impact on VMT based on OPR guidelines.

Conclusion

The proposed testing lab is expected to generate 52 daily vehicle trips, which is 7 fewer daily vehicle trips compared to the former California Highway Patrol office on the site. Because the project is expected to generate fewer than 110 trips per day, it can be presumed to have a less-than-significant impact on VMT based on OPR guidelines.



This page intentionally left blank