

Torrance Gateway (Phase III) Project

Initial Study/ Mitigated Negative Declaration



Prepared for
City of Torrance

January 2022



Toyota Gateway (Phase III) Project

Initial Study/Mitigated Negative Declaration

Prepared for:

City of Torrance
3031 Torrance Blvd.
Torrance, CA 90503

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January 2022

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1.0 INTRODUCTION

1.0 INTRODUCTION

1.1 DOCUMENT PURPOSE AND SCOPE

This Initial Study/Mitigated Negative Declaration (IS/MND) addresses potential environmental impacts associated with construction and operation of the proposed Torrance Gateway (Phase III) Project (Project).¹ The Project proposes up to a total of approximately 730,000 square feet of light industrial uses (warehouse and manufacturing uses) that would productively reuse and redevelop a portion of the previous Toyota Campus Business Park. The Project development concept proposes 5 buildings ranging in size from approximately 135,000 square feet to approximately 159,000 square feet.²

The Project site comprises approximately 39 acres (gross) located at the southwest corner of 190th Street (E – W) and Western Avenue (N – S) in the City of Torrance. The Project site exists in a “horseshoe” configuration bordered by 190th Street to the north, 195th Street (Toyota Way) to the south; Gramercy Place to the west, and Western Avenue to the east.

¹ The various supporting technical studies cited within and appended to this IS/MND may refer to the Project under various titles. However, the Project itself as evaluated in these technical studies conforms to the Project described in this IS/MND.

² Individual aspects of the Project, including individual building configurations and building sizes may be modified in the future as the Project is further defined. However, provided the overall maximum scope of the Project and/or Project uses are not substantially altered, the analysis presented here is not affected. Analyses within this IS/MND reflect the scope and types of uses proposed by the Project described herein. Should future development proposals differ substantially from the development concepts analyzed herein, the Lead Agency would comply with CEQA in consideration of those proposals.

Additionally, please note that certain of the supporting technical analyses reflect earlier site plan configurations with individual building square footages differing from those presented elsewhere in this IS/MND. However, the overall scope and configuration of the Project and Project uses evaluated in these technical studies conform in aggregate with the Project described and evaluated in the body text of this IS/MND.

This IS/MND was prepared pursuant to *CEQA Guidelines* Section 15070 et seq. Although this IS/MND was prepared with consultant support, all analysis, conclusions, findings and determinations presented in the IS/MND fully represent the independent judgment and position of the City of Torrance (City), acting as Lead Agency under CEQA. In accordance with the provisions of CEQA, as the Lead Agency, the City is solely responsible for approval of the Project. As part of the decision-making process, the City is required to review and consider the Project’s potential environmental effects.

CEQA Guidelines Article 6³ discusses the Mitigated Negative Declaration Process, which is applicable to the Project. Article 6 states in pertinent part:

“A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

- (a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- (b) The initial study identified potentially significant effects, but:
 - (1) Revisions in the project plans or proposals made by or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

³ Title 14. California Code of Regulations, Chapter 3. *Guidelines for Implementation of the California Environmental Quality Act*, Article 6. *Negative Declaration Process*.

- (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.”

As supported by the Initial Study presented herein, the City has determined that the Project may result in or cause potentially significant effects. However, compliance with existing policies, plans and regulations, revisions to the Project plans, together with design features and mitigation measures incorporated in the proposal would avoid the effects or mitigate the effects to levels that would be less-than-significant.

The City has consequently determined that a Mitigated Negative Declaration is appropriate for the Project.

This IS/MND is intended to be an informational document, providing the City’s decision-makers, other public agencies, and the public with an objective assessment of the potential environmental impacts that could result from implementation of the proposed Project.

1.2 DOCUMENT ORGANIZATION

This IS/MND includes the following sections.

- Introduction: This Section (1.0) describes the format of the IS/MND and provides summary findings of the environmental analysis.
- Project Description: This Section (2.0) describes the Project and its objectives and outlines the existing regulations that will affect development of the Project.
- Environmental Checklist: This Section (3.0) presents the Project Environmental Checklist Form and responses to topical environmental questions posed within the Checklist. Within the IS Checklist, answers provided are substantiated qualitatively in all instances, and quantitatively where appropriate. Under topical

issues where the Project would have no impact or impacts would be less-than-significant, no mitigation is required. In instances where impacts are determined to be “less-than-significant with mitigation incorporated,” mitigation measures are proposed that would reduce potentially significant environmental impacts to levels that would be less-than-significant. The Environmental Checklist Form *Determination* presents the Lead Agency’s findings regarding the appropriate CEQA environmental documentation for the Project.

1.3 INTENDED USE OF THIS IS/MND

The City of Torrance is the Lead Agency for the purposes of CEQA because it has the principal responsibility and authority for consideration of Project discretionary actions and associated permitting. As the Lead Agency, the City is also responsible for analyzing the Project’s potential environmental impacts.

The Lead Agency will employ this IS/MND in its evaluation of potential environmental impacts resulting from, or associated with, approval and implementation of the Project. This IS/MND may also be used by various Responsible Agencies, e.g., Air Quality Management District(s), Regional Water Quality Control Board(s), *et al.*; as well as utilities and service providers when such entities issue discretionary permits necessary to carry out the Project. For example, if this Project would require discretionary permits from the South Coast Air Quality Management District (SCAQMD), this IS/MND would serve as the environmental assessment for such permits (please refer to *CEQA Guidelines* Section 15050).

In employing this IS/MND, the City and other agencies need to recognize that Project plans and development concepts identified herein are just that – plans and concepts that are subject to refinement as the Project is further defined. Acknowledging the potential for these future minor alterations to the Project, this IS/MND in all instances evaluates maximum impact scenarios that would likely account for these minor alterations. Notwithstanding, at the discretion and direction of the City, future modifications to the Project described herein may warrant additional environmental evaluation.

1.4 DISPOSITION OF THIS DOCUMENT

This IS/MND will be circulated by the City for a minimum of 30 days, to allow for public and agency review. Comments received on the IS/MND will be considered by the City in their review of the Project. The public is encouraged to contact the City for questions regarding the CEQA process and the Project. Comments on the IS/MND may be sent to:

City of Torrance

3031 Torrance Boulevard

Torrance, CA 90503

Attn: Oscar Martinez, Planning & Environmental Manager

Ph. (310) 618-5990; email: OMartinez@TorranceCA.gov

2.0 PROJECT DESCRIPTION

2.0 PROJECT DESCRIPTION

2.1 INTRODUCTION

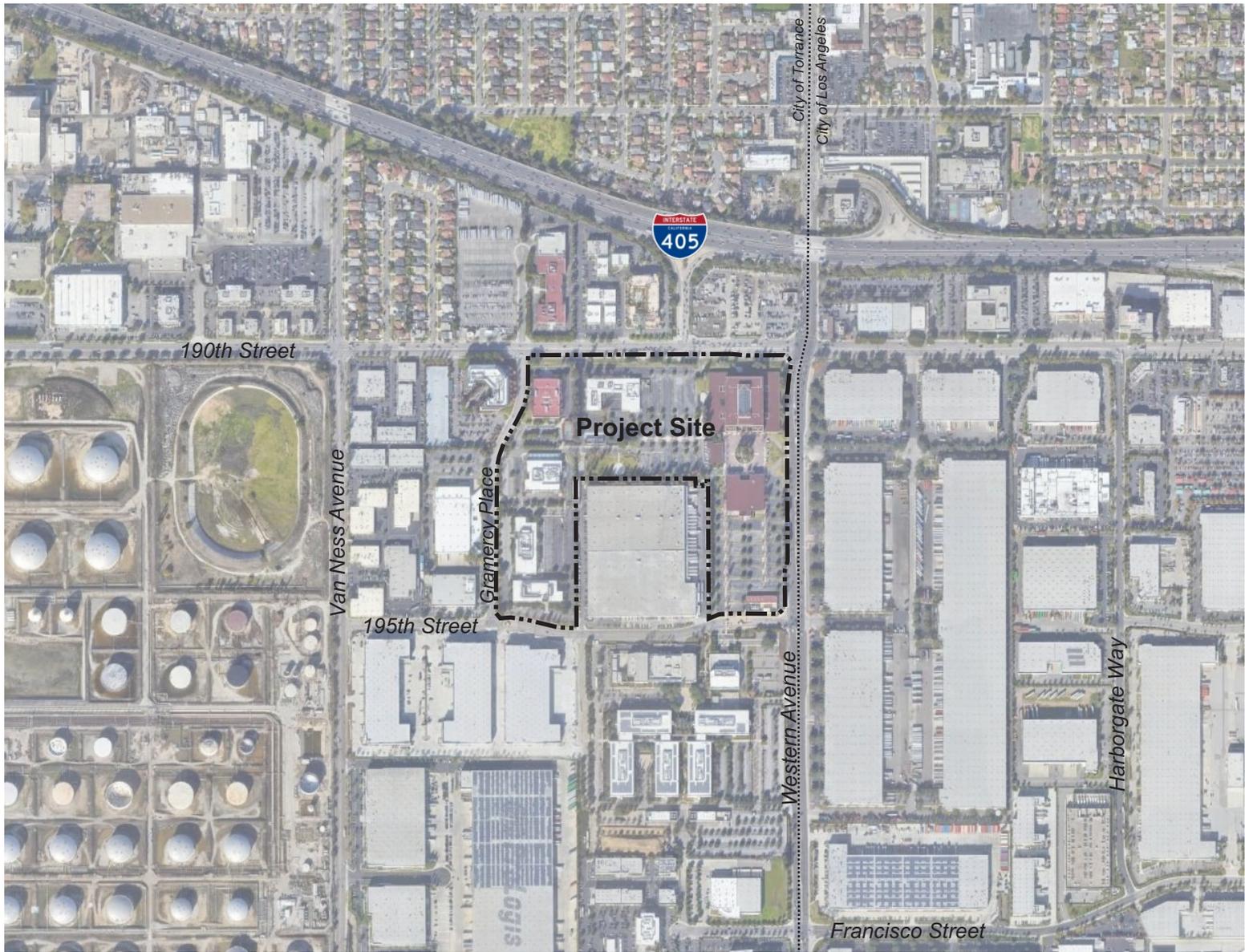
The Torrance Gateway (Phase III) Project (Project)¹ evaluated herein proposes up to a total of approximately 730,000 square feet of light industrial uses (warehouse and manufacturing uses) that would productively reuse and redevelop of a portion of the previous Toyota Campus Business Park. The Project development concept proposes 5 buildings ranging in size from approximately 135,000 square feet to approximately 159,000 square feet.²

The Project site comprises approximately 39 acres (gross) located at the southwest corner of 190th Street (E - W) and Western Avenue (N - S) in the City of Torrance. The Project site exists in a “horseshoe” configuration bordered by 190th Street to the north, 195th Street (Toyota Way) to the south; Gramercy Place to the west, and Western Avenue to the east. The Project site location is illustrated at Figure 2.1-1.

¹ The various supporting technical studies cited within and appended to this IS/MND may refer to the Project under various titles. However, the Project itself as evaluated in these technical studies conforms to the Project described in this IS/MND.

² Individual aspects of the Project, including individual building configurations and building sizes may be modified in the future as the Project is further defined. However, provided the overall maximum scope of the Project and/or Project uses are not substantially altered, the analysis presented here is not affected. Analyses within this IS/MND reflect the scope and types of uses proposed by the Project described herein. Should future development proposals differ substantially from the development concepts analyzed herein, the Lead Agency would comply with CEQA in consideration of those proposals.

Additionally, please note that certain of the supporting technical analyses reflect earlier site plan configurations with individual building square footages differing from those presented elsewhere in this IS/MND. However, the overall scope and configuration of the Project and Project uses evaluated in these technical studies conform in aggregate with the Project described and evaluated in the body text of this IS/MND.



NOT TO SCALE
Source: Google Earth 2020; Applied Planning, Inc.

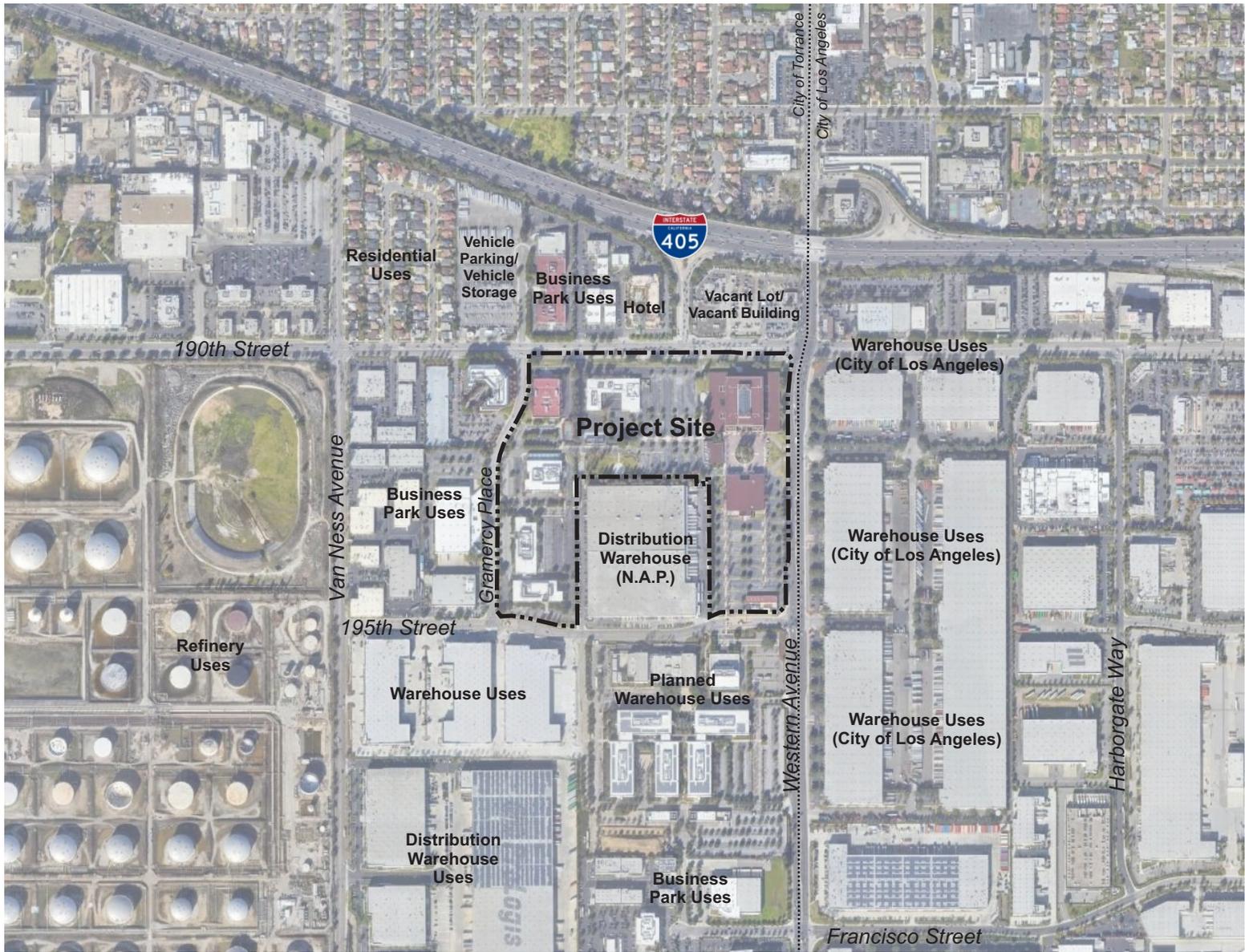
Figure 2.1-1
Project Site Location

2.2 EXISTING LAND USES

Existing land uses are illustrated at Figure 2.2-1. The Project Site currently accommodates various vacant office buildings and ancillary structures originally constructed as part of the Toyota Campus Business Park. Existing land uses of adjacent properties are summarized below:

- **North** (across 190th Street): Business Park, Hotel, Vehicle Parking/Vehicle Storage/Vacant Lot/Vacant Building
- **South** (across 195th Street [Toyota Way]): Planned Warehouse Uses
- **East** (across Western Avenue): Warehouse Uses (City of Los Angeles)
- **West** (across Gramercy Place): Business Park Uses

Bounded by the Project Site on the north, east and west is an existing warehouse use comprising approximately 420,000 square feet. This existing warehouse use is not part of the Project and would not be substantively affected by the Project.



NOT TO SCALE
 Source: Google Earth 2020; Applied Planning, Inc.

Figure 2.2-1
 Existing Land Uses

2.3 EXISTING LAND USE DESIGNATIONS

Existing General Plan Land Use and Zoning Designations are presented at Figures 2.3-1 and 2.3-2, respectively. General Plan Land Use designation of the Project Site is “Business Park” (I-BP). Zoning of the Project site is “Heavy Manufacturing” (M2). The Light Industrial uses proposed by the Project are permitted, or are conditionally permitted under these designations, and no General Plan Land Use Amendment or Zone Change would be required to implement the Project.

- **North** of the Project site, across 190th Street, General Plan Land Use designations of properties are “General Commercial” (C-GEN), and “Business Park” (I-BP). Zoning designations of these properties are “Light Manufacturing” (M1), “Heavy Manufacturing” (M2), “Solely Commercial” (C3), and “Conditional Commercial” (C5).
- **South** of the Project Site, across 195th Street (Toyota Way), General Plan Land Use designation of properties is Business Park. Zoning of these properties is Heavy Manufacturing.
- **West** of the Project Site, across Gramercy Place, General Plan Land Use designation of properties is Business Park. Zoning of these properties is Heavy Manufacturing.
- **East** of the Project site, across Western Avenue, are City of Los Angeles properties. These properties are designated “Heavy Industrial” under the City of Los Angeles General Plan Land Use Plan. City of Los Angeles Zoning of these properties is “Heavy Industrial/Manufacturing” (M3).

General Plan Land Use designation of the warehouse property bounded by the Project Site to the north, east, and west is Business Park. Zoning of this property is Heavy Manufacturing.

The Project does not propose or require uses or activities that would affect any existing General Plan Land Use or Zoning designations.

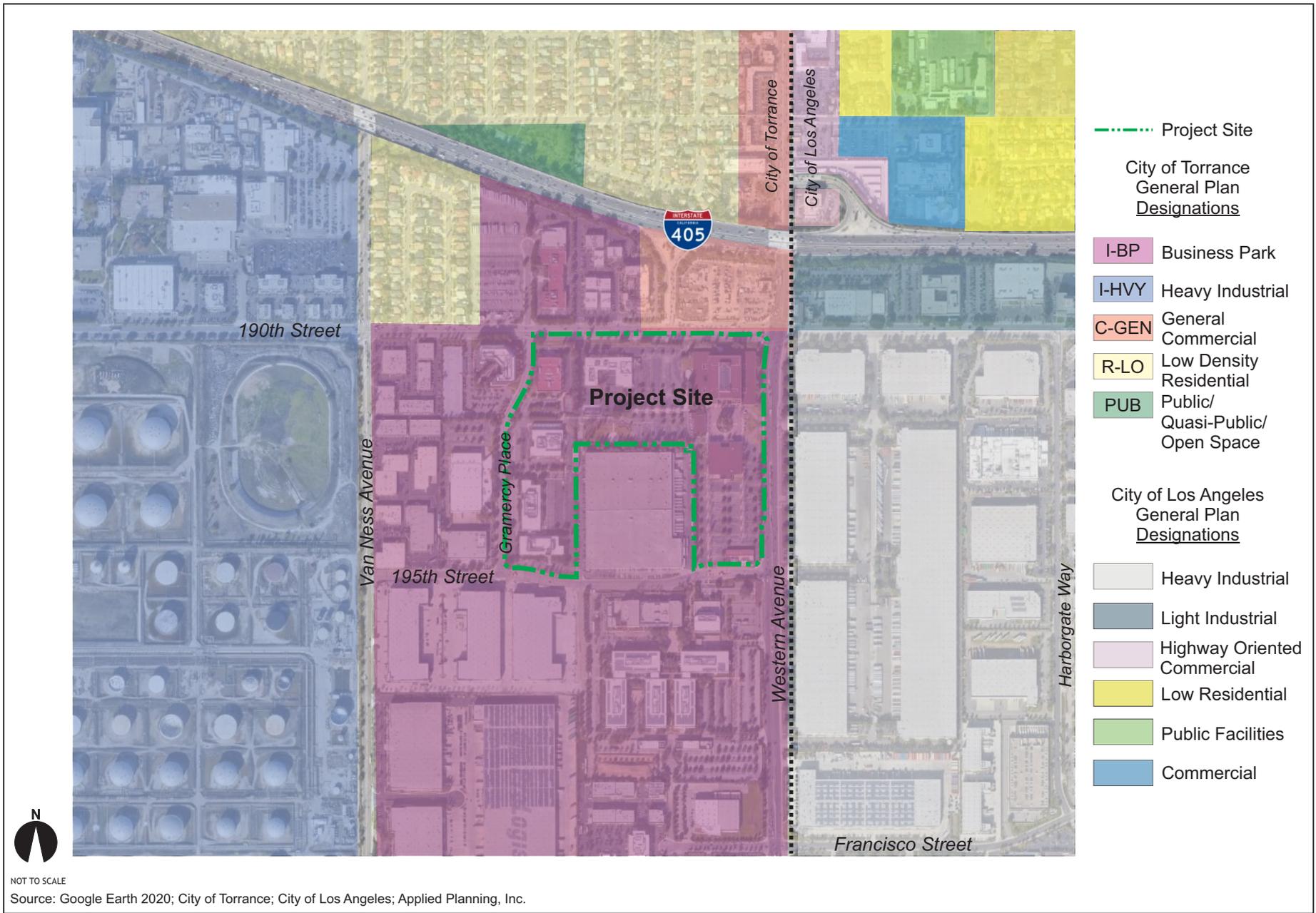
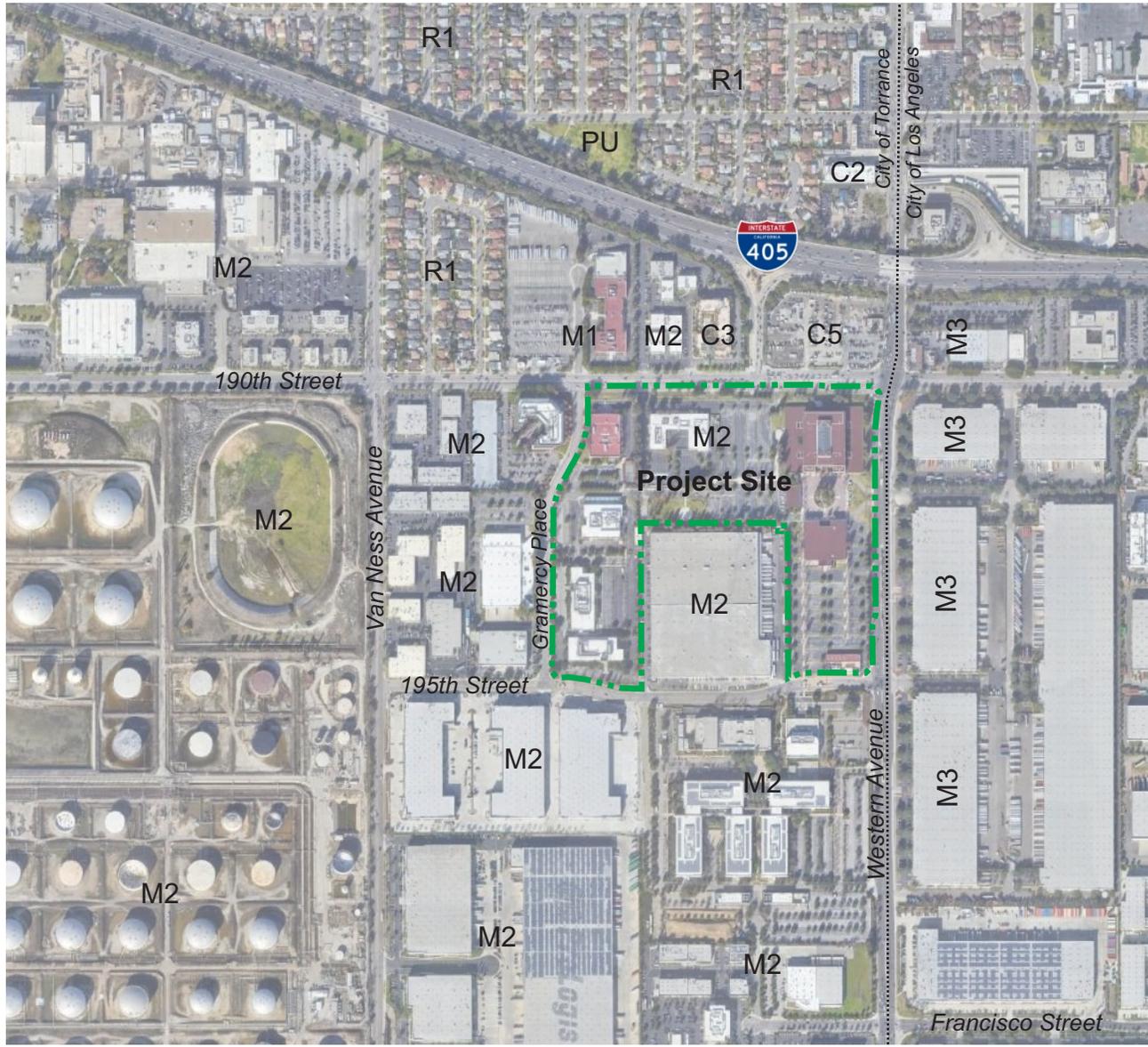


Figure 2.3-1
Existing General Plan Designations



..... Project Site

City of Torrance
Zoning
Designations

- M1 - Light Manufacturing
- M2 - Heavy Manufacturing
- R1 - Single Family Residential
- C2 - General Commercial
- C3 - Solely Commercial
- C5 - Conditional Commercial
- PU - Public Use

City of Los Angeles
Zoning
Designations

- M3 - Heavy Industrial/
Manufacturing



NOT TO SCALE

Source: Google Earth 2020; City of Torrance; City of Los Angeles; Applied Planning, Inc.

Figure 2.3-2
Existing Zoning Designations

2.4 PRIMARY PROJECT ELEMENTS

2.4.1 Site Preparation

Site preparation activities would involve demolition of existing buildings, appurtenant structures, and surface improvements; excavation, fill, and grading.³ Preliminary grading and site development concepts indicate that the site would be retained in its existing level condition. The Project grading concept would maintain a balanced site condition, with no substantive requirement for soil import or export.

2.4.2 Site Development Concept

Within the site, the proposed buildings would be oriented to internalize and screen site operations while providing articulated public facades. The Project would also implement necessary supporting site improvements including, but not limited to: site adjacent road improvements, site access improvements, loading dock areas, truck and car parking areas, landscaping, lighting, and signage.

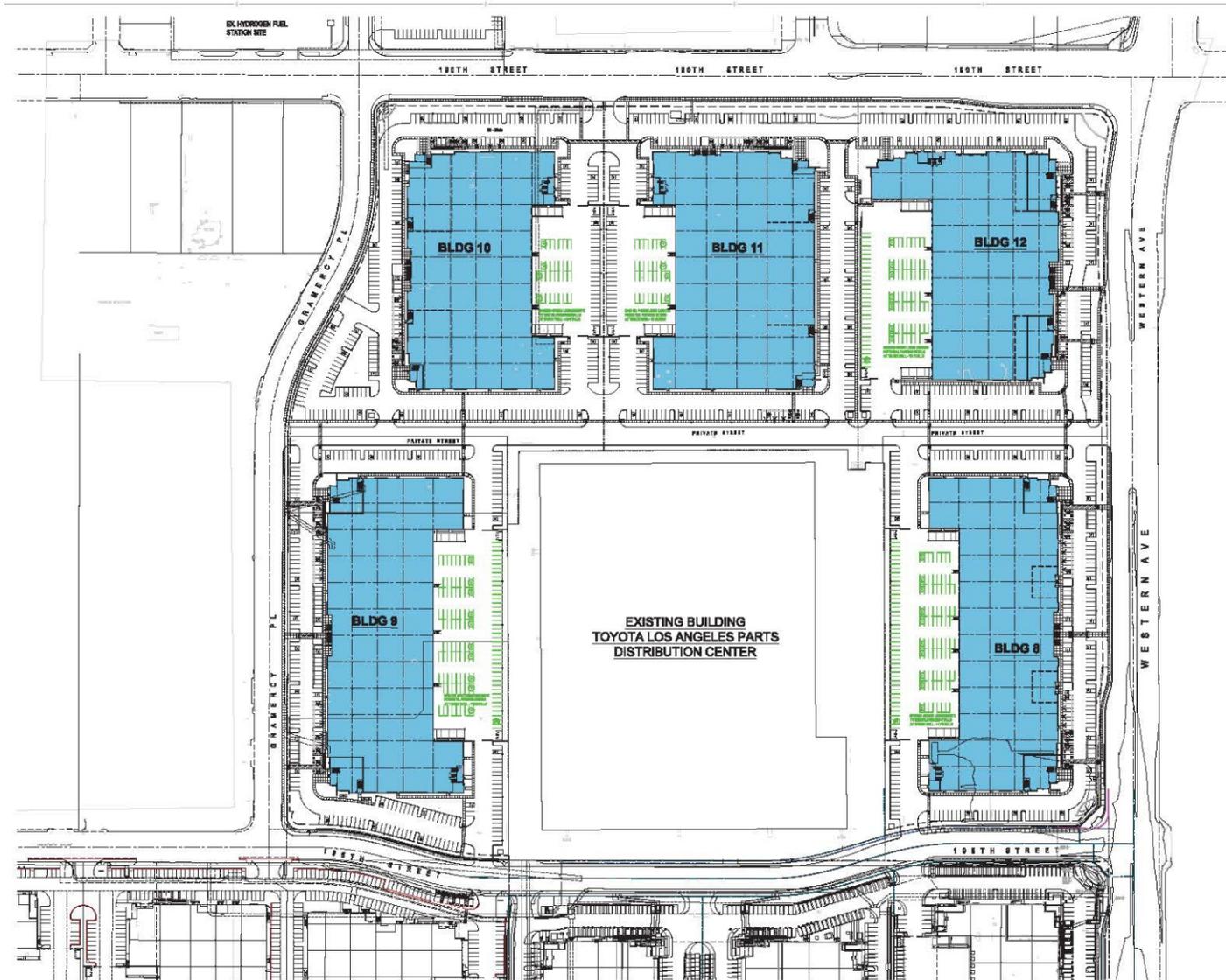
The final Project Site Plan Concept designs would be required to conform to provisions of City of Torrance Municipal Code Division 9 *Land Use*, Article 31 - *M-2 Heavy Manufacturing District*. For the purposes of this analysis, the Project uses are assumed to operate 7 days per week, 24 hours per day. The Project Site Plan Concept is presented at Figure 2.4-1. The Project Development Summary is presented at Table 2.4-1.

**Table 2.4-1
Project Development Summary**

Building No.	Lot Area	Building Area	FAR
8	7.64 Acres (332,701 sf)	138,813 sf	41.7 %
9	8.08 Acres (351,839 sf)	148,295 sf	42.1 %
10	8.03 Acres (349,692 sf)	148,638 sf	42.5%
11	7.90 Acres (344,016 sf)	159,132 sf	46.3 %
12	7.38 Acres (321,266 sf)	135,122 sf	42.1 %
Totals	39.03 Acres (1,700,147sf)	730,000 sf	42.9 % FAR (Aggregate)

Source: Torrance Gateway (Phase III) Project Development Concept (DRA Architects).

³ Among the facilities to be demolished is the private use helipad located in the central portion of the Project site. Ownership of this helipad and all existing facilities within the Project site has been transferred to the Applicant. Demolition of the helipad will be coordinated with the City, Caltrans, and the FAA, as applicable.



NOT TO SCALE
 Source: DRA Architects; Applied Planning, Inc.

Figure 2.4-1
 Site Plan Concept

2.4.3 Access and Circulation

Regional access to the Project site and surrounding areas is provided by Interstate 405 (I-405), Torrance Boulevard, Crenshaw Boulevard, and Western Avenue (State Route 213, SR-213). Local Access to the Project Site is provided by Gramercy Place (N – S), 190th Street (E – W), 195th Street (Toyota Way) (E – W), and Western Avenue (N – S). Gramercy Place, 190th Street, 195th Street (Toyota Way), and Western Avenue comprise respectively, the west, north, south, and east boundaries of the Project Site.

Gramercy Place intersects with 190th Street at the northwest corner of the Project Site. Western Avenue and 190th Street intersect at the northeast corner of the Project Site. Western Avenue connects to I-405 approximately 500 feet north of the Project Site. Western Avenue connects to Torrance Boulevard approximately 1.1 miles south of the Project Site. Crenshaw Boulevard connects to 190th Street and Torrance Boulevard.

Driveways and access to the Project site from adjacent streets are indicated at Figure 2.4-1, *Project Site Plan Concept*. All roads, drive aisles, and access points implemented under the Project would conform to City engineering standards and City of Torrance Fire Department requirements. Western Avenue south of I-405 is located within Caltrans jurisdiction.

2.4.4 Parking

The Project Site Plan Concept provides passenger car vehicle parking areas allocated throughout the subject site adjacent to the proposed buildings. Final parking area allocations, orientations, and configurations would be subject to review and approval by the City.

2.4.5 Landscape/Streetscape

All landscaping/streetscaping would comply with applicable provisions of the City Municipal Code and would maintain established landscape patterns approved under previous entitlements. The implemented landscape/streetscape concept would act to enhance perception of the site as developed under the Project, and to screen views of the site interior from offsite vantages. Landscape and streetscape elements would provide

shade and visual interest, define entry/access points, and accentuate site and architectural features.

2.4.6 Infrastructure/Utilities

2.4.6.1 Water/Sanitary Sewer Services

Water services would be provided to the Project by the Torrance Municipal Water District. The Project would connect to the existing reclaimed water system serving the site.

Sanitary sewer services would be provided to the Los Angeles County Sanitation Districts (LACSD). Water and sanitary sewer service extensions to the subject site would connect to existing facilities located in adjacent public rights-of-way. Final locations and alignments of service lines, and connection to existing services would be provided as required by the City, Cal Water, and LACSD.

2.4.6.2 Stormwater Management System

The Project stormwater management system would implement drainage improvements and programs acting to control and treat stormwater pollutants. The Project stormwater management system would be required to comply with applicable provisions of City of Torrance Municipal Code Chapter 11 *Low Impact Development Strategies for Development and Redevelopment*.

Components of the Project stormwater management system would include a City-approved Storm Water Pollution Prevention Plan (SWPPP) and Standard Urban Stormwater Mitigation Plan (SUSMP).

Through implementation of the SWPPP and SUSMP, the proposed development would comply with requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit and other water quality requirements and storm water management programs specified by the Regional Water Quality Control Board (RWQCB). Implementation of the City-approved stormwater management system including the

SWPPP and SUSMP; and compliance with NPDES Permit and RWQCB requirements act to protect City and regional water quality by preventing or minimizing potential stormwater pollutant discharges to the watershed.

2.4.6.3 Solid Waste Management

Solid waste generated by the Project would be conveyed by existing service providers to the nearest accepting County landfills. The California Integrated Waste Management Act under the Public Resources Code required that local jurisdictions divert at least 50% of all solid waste generated by January 1, 2000. The California Legislature and Governor Brown also established a goal of 75 percent recycling, composting or source reduction of solid waste by 2020 calling for the state and the Department of Resources Recycling and Recovery (CalRecycle) to take a statewide approach to decreasing California's reliance on landfills. See also: <https://www.calrecycle.ca.gov/75percent>.

The City is currently meeting or exceeding all state-mandated solid waste diversion targets acting to reduce potential impacts at serving landfills. The City remains committed to continuing its existing waste reduction and minimization efforts with the programs that are available through the City. The Project would comply with the California Integrated Waste Management Act as implemented by the City, and would conform to all future recycling/source reduction mandates as they become effective.

Additionally, consistent with California Green Building Standards Code (CALGreen Code) Section 5.408 *Construction Waste Reduction, Disposal, and Recycling*, a minimum of 50 percent of nonhazardous construction and demolition waste generated by the Project would be recycled or salvaged for reuse. To these ends, a Construction Waste Management Plan would be prepared consistent with CALGreen Code Section 5.408.1.1. These measures would collectively reduce construction waste and would act to reduce total demands on solid waste management resources.

2.4.6.4 Electricity

Electrical service to the Project would be provided by Southern California Edison (SCE). Alignment of service lines and connection to existing services would conform to City and SCE requirements. Any necessary surface-mounted equipment, such as transformers, meters, service cabinets, and the like, would be screened and would conform to City building setback requirements.

The connections to existing services, and implementation of appurtenant electrical improvements is consistent with and reflected within the total scope of development proposed by the Project. Similarly, impacts resulting from connections to existing services, and implementation of appurtenant electrical improvements would not be substantially different from, or greater than, impacts resulting from development of the Project in total.

During construction, provision of temporary SCE service improvements may be required. The scope of such temporary improvements is consistent with and reflected within the total scope of development proposed by the Project. Similarly, impacts resulting from the provision of temporary SCE service improvements would not be substantially different from, or greater than, impacts resulting from development of the Project in total.

2.4.6.5 Natural Gas

Natural gas service would be provided by the Southern California Gas (SoCalGas). Existing service lines would be extended to uses implemented under the Project. Alignment of service lines and connection to existing services would be as required by the City and SoCalGas.

During construction, provision of temporary SoCalGas service improvements may be required. The scope of such temporary improvements is consistent with and reflected within the total scope of development proposed by the Project. Similarly, impacts resulting from the provision of temporary SoCalGas service improvements would not be

substantially different from, or greater than, impacts resulting from development of the Project in total.

2.4.6.6 Communications Services

Communications services, including wired and wireless telephone and internet services are available through numerous private providers and would be provided on an as-needed basis. To the extent practical and consistent with City Conditions of Approval, existing and proposed wires, conductors, conduits, raceways, and similar communications improvements within the Project area would be installed underground. Any necessary surface-mounted equipment, e.g., terminal boxes, transformers, meters, service cabinets, etc., would be screened and would conform to City building setback requirements.

During construction, provision of temporary communication service improvements may be required. The scope of such temporary improvements is consistent with and reflected within the total scope of development proposed by the Project. Similarly, impacts resulting from the provision of temporary communication service improvements would not be substantially different from, or greater than, impacts resulting from development of the Project in total.

2.4.7 Police and Fire Protection Services

Police and fire protection services are currently available to the Project Site and are listed below.

- Fire Protection Services: City of Torrance Fire Department
- Police Protection Services: City of Torrance Police Department

The City of Torrance has implemented a Development Impact Fee (DIF) program for police and fire protection services. The Project Applicant would be required to pay police and fire protection fees pursuant to the City DIF program, acting to offset the Project's incremental demands for police and fire protection services.

2.4.8 Energy Efficiency/Sustainability

Energy-saving and sustainable design features and operational programs would be incorporated into all facilities developed pursuant to the Project. The Project would be required to comply with incumbent energy efficiency and performance standards established under the CALGreen Code.

The Project incorporates and expresses the following design features and attributes promoting energy efficiency and sustainability.

- The Project would comply with incumbent Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6);
- To reduce water demands and associated energy use, development proposals within the Project Site would be required to implement a Water Conservation Strategy and demonstrate a minimum 20% reduction in indoor water usage when compared to baseline water demand (total expected water demand without implementation of the Water Conservation Strategy).⁴ The Project would connect to the available reclaimed water system serving the site, acting to reduce potable water demands. The Project would also be required to implement the following:
 - Landscaping palette emphasizing drought-tolerant plants consistent with provisions of the State Model Water Efficient Landscape Ordinance and/or City of Torrance requirements;
 - Use of water-efficient irrigation techniques consistent with City of Torrance requirements;

⁴ Reduction of 20% indoor water usage is consistent with the current CalGreen Code performance standards for residential and non-residential land uses. Per CalGreen, the reduction shall be based on the maximum allowable water use per plumbing fixture and fittings as required by the California Building Standards Code.

- U.S. Environmental Protection Agency (EPA) Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and other plumbing fixtures.

2.4.9 Construction Area Traffic Management Plan

Temporary and short-term traffic detours and traffic disruptions could result during construction activities including implementation of access and circulation improvements noted above. Accordingly, the Applicant for the Project would be responsible for the preparation and submittal of a Construction Area Traffic Management Plan (Plan). Typical elements and information incorporated in the Plan would include, but not be limited to:

- **Name of on-site construction superintendent and contact phone number.**
- **Identification of Construction Contract Responsibilities** - For example, for excavation and grading activities, describe the approximate depth of excavation, and quantity of soil import/export (if any).
- **Identification and Description of Truck Routes** - to include the number of trucks and their staging location(s) (if any).
- **Identification and Description of Material Storage Locations (if any).**
- **Location and Description of Construction Trailer (if any).**
- **Identification and Description of Traffic Controls** - Traffic controls shall be provided per the Manual of Uniform Traffic Control Devices (MUTCD) if the occupation or closure of any traffic lanes, parking lanes, parkways or any other public right-of-way is required. If the right-of-way occupation requires configurations or controls not identified in the MUTCD, a separate traffic control plan must be submitted to the City for review and approval. All City right-of-way encroachments would require permitting through the City. Western Avenue south

of I-405 is located within Caltrans jurisdiction; encroachments within this section of Western Avenue would require permitting through Caltrans.

- **Identification and Description of Parking** - Estimate the number of workers and identify parking areas for their vehicles.
- **Identification and Description of Maintenance Measures** - Identify and describe measures taken to ensure that the work site and public right-of-way would be maintained (including dust control).

The Plan would be reviewed and approved by the City prior to the issuance of the first building permit. The Plan and its requirements would also be required to be provided to all contractors as one component of building plan/contract document packages.

2.4.10 Opening Year

For the purposes of this analysis, the Project Opening Year is defined as 2023, by which time all proposed uses are assumed to be complete, occupied, and operational.

2.5 PROJECT OBJECTIVES

The primary goal of the Project is to redevelop and repurpose the subject site with high quality light industrial and manufacturing uses. Complementary Objectives of the Project include the following:

- Implement the City's General Plan through development that is consistent with the General Plan Land Use Element and applicable General Plan Goals, Objectives, Policies and Programs.
- Provide adequate roadway and wet and dry utility infrastructure to serve the Project.
- Accommodate light industrial uses that are compatible with adjacent land uses.

- Accommodate light industrial uses responsive to current and anticipated market demands.
- Make efficient use of the underutilized subject property by maximizing its buildout potential for employment-generating light industrial uses.
- Provide light industrial uses near existing roadways and freeways to reduce VMT, traffic congestion, and air emissions.
- Attract new businesses and jobs and thereby foster economic growth generally.
- Establish new development that would increase locally available employment opportunities thereby improving jobs/housing balance within the City.

2.6 DISCRETIONARY APPROVALS and PERMITS

Discretionary actions, permits, and related consultation(s) necessary to approve and implement the Project include, but are not limited to, the following.

2.6.1 Lead Agency Discretionary Actions and Permits

- Adoption of this Mitigated Negative Declaration;
- Approval of a Tier 2 Conditional Use Permit (CUP);
- Division of Lot (DIV) for Mapping; and
- Approval of a Tentative Parcel Map.

2.6.2 Other Consultation and Permits

Anticipated consultation and permits necessary to realize the Project would likely include, but are not limited to, the following:

- Tribal Resources consultation with requesting Tribes as provided for under AB 52 (Gatto 2014). Native Americans: California Environmental Quality Act.

- Permitting may be required by/through the Regional Water Quality Control Board (RWQCB) pursuant to requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit.
- Permitting may be required by/through the South Coast Air Quality Management District (SCAQMD) for certain equipment or land uses that may be implemented pursuant to the Project.
- Permitting by Caltrans for SR-213 (Western Avenue) access/encroachment permits.
- Permitting (i.e., utility construction and connection permits) from affected utility purveyors.
- Other ministerial permits necessary to realize all on and offsite improvements related to the development of the site.

3.0 ENVIRONMENTAL CHECKLIST



Environmental Checklist Form

1. **Project Title:** Torrance Gateway (Phase III) Project ¹
2. **Lead Agency Name and Address:** City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503
3. **Contact Person and Phone Number:** Oscar Martinez
Planning & Environmental Manager
310.618.5990
4. **Project Location:** Southwest corner of 190th Street (E – W) and Western Avenue (N – S) in the City of Torrance. The Project site exists in a “horseshoe” configuration bordered by 190th Street to the north, 195th Street (Toyota Way) to the south; Gramercy Place to the west, and Western Avenue to the east. The Project site comprises current Assessor Parcel Numbers (APNs): 7352-016-040, 7352-016-042, 7352-016-044.
5. **Project Sponsor's Name & Address:** Sares Regis Group/SRG Commercial
3501 Jamboree Road, Suite 3000
Newport Beach, CA 92660
6. **General Plan Designation:** Business Park (I-BP)
7. **Zoning:** Heavy Manufacturing (M2)
8. **Description of the Project:** The Project proposes up to a total of approximately 730,000 square feet of light industrial uses (warehouse and manufacturing uses) that would productively reuse and redevelop a portion of the previous Toyota Campus Business Park. The Project development concept proposes 5 buildings ranging in size from approximately 135,000 square feet to approximately 159,000 square feet. ²

Other primary aspects and attributes of the Project include:

¹ The various supporting technical studies cited within and appended to this IS/MND may refer to the Project under various titles. However, the Project itself as evaluated in these technical studies conforms to the Project described in this IS/MND.

² Certain of the supporting technical analyses reflect earlier site plan configurations with individual building square footages differing from those presented elsewhere in this IS/MND. However, the overall scope and configuration of the Project and Project uses evaluated in these technical studies conform in aggregate with the Project described and evaluated in the body text of this IS/MND.



City of Torrance, Community Development Dept.

3031 Torrance Blvd., Torrance, CA 90503 (310) 618-5990

Michelle G. Ramirez, Director

Environmental Checklist Form

- The Project site comprises approximately 39 total acres; total.
- Total Project building floor area results in a 0.43 Floor Area Ratio (FAR) for the Project site, within the maximum 0.60 FAR analyzed in the 2009 General Plan EIR (SCH No. 2008111046).
- Project buildings are of concrete tilt-up construction and measure a maximum 53' in height.
- Project buildings configured on separate parcels with shared site access, circulation, and parking and landscape areas.
- Mapping action for the Project includes subdivision of the subject site into five parcels.
- Access to the Project site will be provided from 190th Street, Western Avenue, 195th Street, and Gramercy Place.

To allow for the Project, under separate permit, 9 existing buildings within the site totaling approximately 590,230 sf will be demolished.

9. Surrounding Land Uses and Setting:

The Project site is located within an urbanized environment, and in an industrial area with nearby industrial and commercial uses. The Project site currently accommodates various vacant office buildings and ancillary structures originally constructed as part of the Toyota Campus Business Park. Existing uses will be demolished under separate permit prior to implementation of the Project. Existing land uses of adjacent properties are summarized below:

- North (across 190th Street): Business Park, Hotel, Vehicle Parking/Vehicle Storage, Vacant Lot/Vacant Building
- South (across 195th Street [Toyota Way]): Planned Warehouse Uses
- East (across Western Avenue): Warehouse Uses (City of Los Angeles)
- West (across Gramercy Place): Business Park Uses

Bounded by the Project site on the north, east, and west is an existing warehouse use comprising approximately 420,000 square feet. This existing warehouse use is not part of the Project and would not be substantively affected by the Project.



Environmental Checklist Form

10. **Other public agencies whose approval may be required:**

Reference photos of the Project site and surrounding land uses are presented subsequently at Figures 3-1 through 3-4.

California Department of Transportation (Caltrans), South Coast Air Quality Management District, Los Angeles Regional Water Quality Control; and Los Angeles County Sanitation District.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

Tribal Resources Consultation (Consultation) with requesting Tribes has been initiated by the City as provided for under AB 52, Gatto. Native Americans: California Environmental Quality Act. Pursuant to the Consultation process, if potentially significant impacts to Tribal Cultural Resources are identified, the City and affected Tribe(s) will mutually agree to measures that would avoid or mitigate these impacts. Alternatively, affected parties acting good faith and after reasonable effort, may conclude that a mutual agreement cannot be reached. In anticipation of the results of the consultation process, preliminary Mitigation Measures been incorporated in this IS/MND. These Measures will be modified if/as necessary based on specific requests from any responding Tribes. Please refer to IS/MND Mitigation Measures TCR-1 through TCR-3. These measures would ensure that potential impacts to cultural resources and Tribal Cultural Resources would remain at levels that would be less-than-significant.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to Tribal Cultural Resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

It is also noted that a South Central Coastal Information Center (SCCIC) records search for Native American historical and archeological resources has been conducted as part of this analysis. The SCCIC records search indicates that no archaeological or built-environment resources are located within the Project site or surrounding areas. (see: California Historical Resources Information System (CHRIS) Report, SCCIC File #18297.4314 (SCCIC) 11/27/2017, IS/MND Appendix B). Given the absence of recorded resources, and the urbanized and fully developed/disturbed character of the Project site, it is considered unlikely that any resources of potential significance would be encountered or disturbed during Project development. Please refer also to the discussions presented at IS/MND Checklist Items 5. Cultural Resources and 18. Tribal Cultural Resources.

The City of Torrance sent notifications regarding the Project to Tribes listed by the NAHC and that have submitted to the City a formal request for notification. The following Tribes were notified by the City:

- **Gabrieleno Band of Mission Indians - Kizh Nation;**
- **Gabrieleno/Tongva San Gabriel Band of Mission Indians;**
- **Gabrielino/Tongva Nation;**
- **Gabrielino Tongva Indians of California Tribal Council;**
- **Gabrielino-Tongva Tribe;**
- **Santa Rosa Band of Cahuilla Indians; and**



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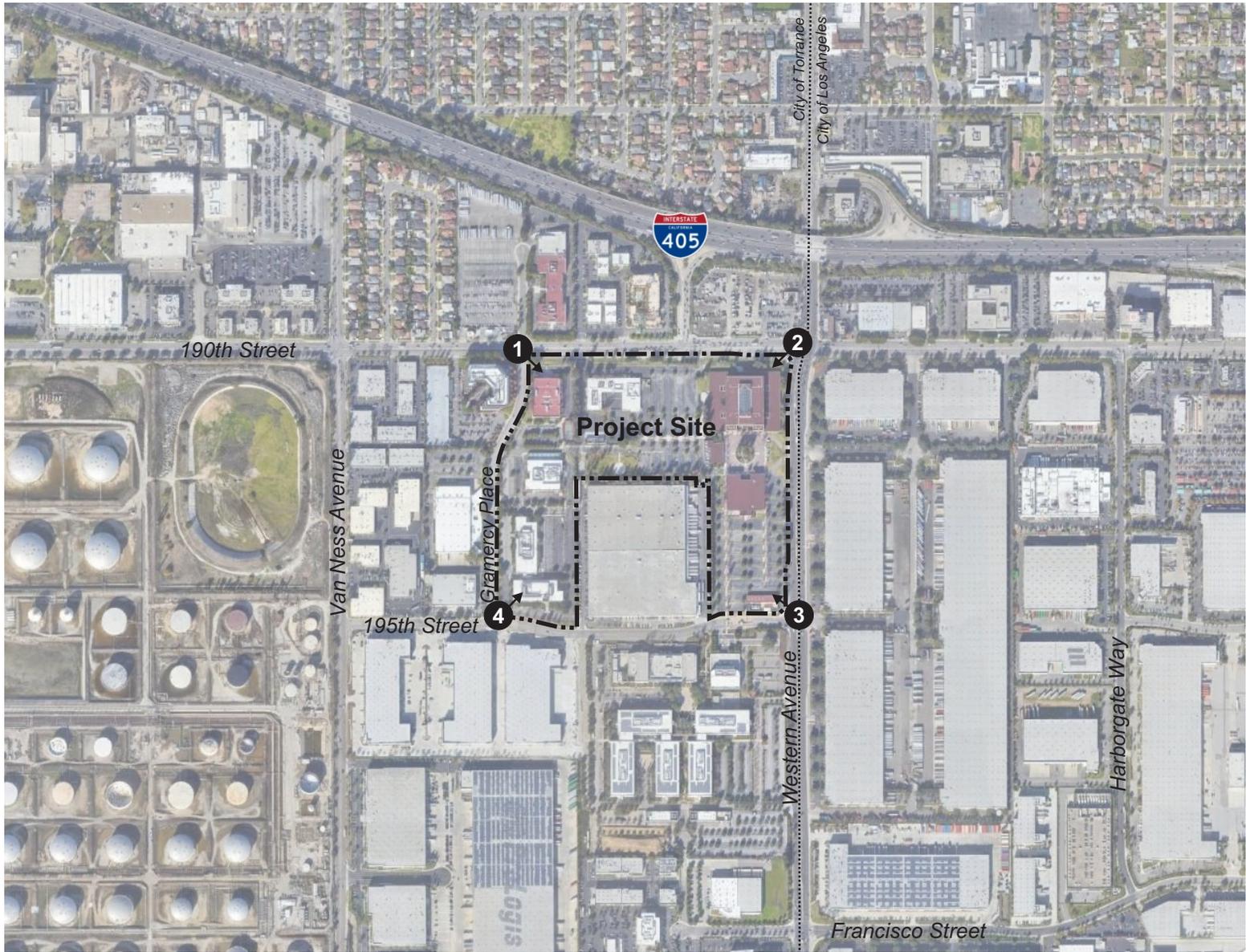
Environmental Checklist Form

- **Soboba Band of Luiseno Indians.**

Of the above-listed, the Gabrieleno Band of Mission Indians - Kizh Nation has requested consultation regarding the Project. The City of Torrance has entered into the consultation process with the Gabrieleno Band of Mission Indians - Kizh Nation. The City will continue to make good-faith efforts in coordinating consultation with any requesting Tribe.



NOT TO SCALE
Source: Google Earth 2020; Applied Planning, Inc.



NOT TO SCALE
Source: Google Earth 2020; Applied Planning, Inc.

Figure 3-2
Photo Key Map



Photo 1: View from the intersection of 190th Street/Gramercy Place.



Photo 2: View from the intersection of 190th Street/Western Avenue.

Source: Google Earth 2020; Applied Planning, Inc.



Photo 3: View from the intersection of Western Avenue/195th Street.



Photo 4: View from the intersection of 195th Street/Gramercy Place.

Source: Google Earth 2020; Applied Planning, Inc.

ENVIROMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology / Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Field Inspections and Assessments By:

Leo Oorts, Senior Planning Associate

Date

CONCUR:

Oscar Martinez, Planning & Environmental Manager,
Secretary to the Planning Commission

Date

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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1. AESTHETICS. Except as provide in Public Resources Code Section 21099, would the project:

- (a) Have a substantial adverse effect on a scenic vista? 7, 17

According to the Community Resources Element of the City of Torrance General Plan, the San Gabriel Mountains and Pacific Ocean are considered scenic vistas. Recognizing the value of these scenic views, the City has adopted policies for hillside areas, which typically offer scenic vistas of these resources. The Project site is located in a largely urbanized area bordered by development on all sides, not located on a hillside, and is approximately 4.4 miles northeast of the nearest hillside area, thus no scenic views near the Project site would be adversely affected. The Project proposes redevelopment within an urbanized area bordered by development on all sides. The Project site does not comprise a scenic resource and the Project does not propose or require facilities or uses that interfere with or obstruct views of any off-site scenic resources. On this basis, the Project would have no potential to result in a substantial adverse effect on a scenic vista.

- (b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? 7, 17

The Project site is located in a largely urbanized area bordered by development on all sides. The Project site is not located near any state scenic highway or near any scenic resources. No rock outcroppings or historic buildings would be removed from the Project site. No scenic resources within a scenic highway or special designated area for street trees would be damaged as a result of the Project. There are no designated or eligible scenic highways serving the Project site. Nor would the Project otherwise potentially affect a scenic highway. On this basis, the Project would have no potential to substantially damage scenic resources.

- (c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? 5, 6, 7, 17

The Project proposes infill redevelopment within an urbanized area. The Project uses are permitted or are conditionally permitted by the site's existing Zoning designation. The Project would be required to comply with applicable provisions of the City of Torrance Zoning Code (Zoning Code) including applicable design and development standards.

The Project site is located in a largely urbanized area bordered by development on all sides. Industrial and commercial uses are to the north across 190th Street, with industrial uses to the east across Western Avenue, west across Gramercy Place, and south across 195th Street. The existing buildings at the Project site and other structures in the vicinity do not have any unusual characteristics and are not known to be associated with any national, regional, or local figures of significance that would qualify them as a historical resource or of historic significance. Approval of the Project would replace the existing Toyota Campus Business Park uses with new light industrial uses. The Project buildings measure approximately 53' in height, similar to other industrial building heights in the vicinity. The Project would be visible from industrial and commercial type uses located in the vicinity. The Project would be treated with materials and high-quality finishes similar to existing developments in the vicinity, and features varying projections and heights, which break up massing and make the Project aesthetically appealing. The Project would also incorporate internal and perimeter landscape/hardscape features acting to screen views of the developed site, enhancing visual perception of the Project site specifically, and vicinity properties generally. All final designs of the Project, including but not limited to the proposed building and landscape/hardscape features would be required to conform to all applicable City design standards, and would be subject to City review and approval. This would ensure that the Project would not substantially degrade the existing visual character or quality of the site and its surroundings. The City would verify compliance with applicable Zoning Code requirements prior to the issuance of development permits. On this basis, the potential for the Project to substantially degrade the existing visual character or quality of public views of the site and its surroundings; or conflict with applicable zoning and other regulations governing scenic quality is considered less-than-significant.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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- | | | | | | |
|--|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | 5, 6, 7, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Project site is located in a largely urbanized area bordered by development on all sides that currently generate light from a variety of sources, including adjacent streets and properties that are illuminated with streetlights and that carry nighttime traffic. Lighting from the Project is not likely to alter these area ambient lighting conditions. The Project would replace existing building lighting and parking lot lighting with new lighting along the new buildings and throughout the parking areas.

The Torrance Municipal Code requires that any new lighting be cast downward and shielded so as not to illuminate beyond the Project boundary and to avoid any light from spilling over onto adjacent property. Final design, configuration, and orientation of lighting features and fixtures under the Project would be subject to City review and approval, acting to ensure that Project lighting would be compatible with, and would complement, architectural and site designs; and further that the Project lighting would be compatible with and would not adversely affect off-site land uses.

Conformance with the City Municipal Code requirements and implementation of General Plan Policies would ensure that the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views. The potential for the Project to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area is therefore considered less-than-significant.

2. AGRICULTURE RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

- | | | | | | |
|---|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | 7, 14 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Project site is currently developed with various vacant office buildings and ancillary structures originally constructed as part of the Toyota Campus Business Park. The site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on any map prepared by the California Resources Agency, pursuant to the Farmland Mapping and Monitoring Program. There are no agricultural resources or operations located at the Project site or in the immediate area. As a result, no adverse environmental impacts are anticipated.

- | | | | | | |
|---|----------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? | 6, 7, 14 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|----------|--------------------------|--------------------------|--------------------------|-------------------------------------|

Zoning of the Project site is Heavy Manufacturing (M2). No Williamson Act contracts are in place for the subject site or vicinity properties. The Project will therefore not conflict with any existing agricultural zoning designations, nor affect any existing Williamson Act contract(s).

ENVIRONMENTAL ISSUES:		Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

6, 7, 14

The Project site is not zoned for forest land, timberland, or timberland zoned Timberland Production. There are no forest resources or operations located at the Project site nor in the immediate area. The Project would therefore have no impact on forest land or timberland.

(d) Result in the loss of forest land or conversion of forest land to non-forest use?

6, 7

No forest land is located on the Project site or in the Project vicinity. The Project would therefore have no impact related to loss of forest land or conversion of forest land.

(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

6, 7, 17

The Project site is located in a largely urbanized area bordered by development on all sides. There are no agricultural or forestry resources or operations located at, adjacent to, or near the Project site. The Project would not introduce any changes that would result in conversion of farmland or forest land. The Project does not require or propose "other changes" in the environment which could result in the conversion of farmland or forestland to other uses.

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

(a) Conflict with or obstruct implementation of the applicable air quality plan?

10, 17

The Project is located within the South Coast Air Basin (Basin), which is characterized by relatively poor air quality. The South Coast Air Quality Management District (SCAQMD) has jurisdiction over an approximately 10,743-square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what used to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, as well as state and federal agencies, to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

The SCAQMD has adopted Air Quality Management Plans (AQMPs) outlining strategies to achieve state and federal ambient air quality standards. AQMPs are periodically updated to reflect technological advances, recognize new or pending regulations, more effectively reduce emissions, accommodate growth, and minimize any negative fiscal impacts of air pollution control on the economy.

In March 2017, the SCAQMD released the Final 2016 AQMP (2016 AQMP). The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2016 – 2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 – 2040 RTP/SCS) and updated emission inventory methodologies for various source categories. Air quality conditions and trends presented in the 2016 AQMP assume that regional development will occur in accordance with population growth projections identified by SCAG in the 2016 – 2040 RTP/SCS.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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The SCAG 2016 – 2040 RTP/SCS in turn derives its assumptions, in part, from general plans of cities located within the SCAG region. Accordingly, if a project is consistent with the development and growth projections reflected in the adopted general plan, it would be consistent with the growth assumptions in the SCAG 2016 – 2040 RTP/SCS and 2016 AQMP. The 2016 AQMP further assumes that development projects within the region will implement appropriate strategies to reduce air pollutant emissions, thereby promoting timely implementation of the AQMP.

Criteria for determining consistency with the AQMP are identified at Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD CEQA Air Quality Handbook (1993). AQMP consistency criteria are listed below. Project consistency with, and support of, these criteria is presented subsequently.

- **Criterion No. 1:** The project under consideration will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Criterion No. 2:** The project under consideration will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

Criterion No. 1: The violations that Criterion No. 1 refers to are the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). CAAQS and NAAQS violations would occur if Localized Significance Thresholds (LSTs) or regional significance thresholds were exceeded. Project construction-source emissions would not exceed applicable LSTs or regional significance thresholds. See following discussion at Item 3 b) under the heading “Localized Impacts.”

Project operational-source emissions would not exceed applicable LSTs or regional significance thresholds. See following discussion at Item 3 b) under the heading “Localized Impacts.” Further, the Project would implement applicable Best Available Control Measures (BACMs), and would comply with applicable SCAQMD rules, acting to further reduce potential air quality impacts. On this basis, the Project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations.

Criterion No. 2: Criterion No. 2 addresses consistency of a given project with approved local and regional land use plans and associated potential AQMP implications. That is, AQMP emissions models and emissions control strategies are based in part on land use data provided by local general plan documentation; and regional plans, which reflect and incorporate local general plan information. The emphasis of this criterion is to ensure that the analyses conducted for any given project are based on the same forecasts as the AQMP.

Projects that propose general plan amendments may increase the intensity of use and/or result in higher traffic volumes, thereby resulting in increased operational-source emissions (stationary and vehicular-sources) when compared to the AQMP assumptions. However, if a given project is consistent with and does not otherwise exceed the growth projections in the applicable local general plan, then that project would be considered consistent with the growth assumptions in the AQMP.

General Plan Consistency

Light industrial uses proposed by the Project are allowed under the site’s existing General Plan “Business Park” Land Use designation. The Project does not propose or require amendment of the site’s Business Park Land Use designation.

No General Plan Amendment (GPA) is required in conjunction with the Project. The Project would not result in growth or development not anticipated under the AQMP. Project operational-source emissions are reflected in the AQMP assumptions, and would not result in AQMP inconsistencies.

Regional Plan Consistency

Development of the City pursuant to the General Plan is reflected in Southern California Association of Governments (SCAG) planning efforts and policies including: The 2016 – 2040 Regional Transportation Plan/Sustainable Communities Strategy (SCAG) April 2016 (2016 – 2040 RTP/SCS). The Project is consistent with the General Plan and by extension is reflected in SCAG planning efforts and policies.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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The Final 2008 Regional Comprehensive Plan (SCAG) 2008 (2008 RCP) defines a vision for the SCAG region to be implemented under a strategic plan addressing the regions interrelated housing, traffic, water and air quality issues. The 2008 RCP does not mandate planning actions. SCAG does however request that local governments consider the 2008 RCP recommendations in developing or amending local plans, codes, design guidelines, and other related actions. SCAG promotes use of the 2008 RCP as an advisory policy document for voluntary use by local agencies. The Project does not propose or require actions that would somehow conflict with 2008 RCP advisory policies.

AQMP Consistency Conclusion

Project construction-source emissions would not exceed any applicable regional or local thresholds. Project operational-source emissions would not exceed any applicable regional or local thresholds. The Project would not result in or cause NAAQS or CAAQS violations. The Project does not propose or require amendment of the City General Plan, and the Project land uses are reflected in the AQMP. The Project is consistent with and reflected in applicable regional planning efforts. On this basis, the Project is considered to be consistent with the AQMP. The potential for the Project to conflict with or obstruct implementation of the AQMP is therefore less-than-significant.

- (b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? 10, 17

Criteria Pollutant Attainment Status Designations for the Project Area are summarized at Table 3-1.

**Table 3-1
Criteria Pollutant Attainment Status Designations**

Criteria Pollutant	State Designation	Federal Designation
O ₃ – 1-hour standard	Nonattainment	--
O ₃ – 8-hour standard	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO ₂	Attainment	Unclassifiable/Attainment
SO ₂	Unclassifiable/Attainment	Unclassifiable/Attainment
Pb	Attainment	Unclassifiable/Attainment

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

Consistent with SCAQMD guidance, less-than-significant non-attainment impacts at the Project level are not cumulatively considerable, and would not result in a cumulatively considerable net increase of criteria pollutant(s) for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Conversely, significant non-attainment impacts at the Project level are cumulatively considerable, and would result in a cumulatively considerable net increase of criteria pollutant(s) for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Regional Impacts

Construction-Source Air Pollutant Emissions

Project construction activities (e.g., demolition, site preparation, grading, building construction, paving, architectural coating, infrastructure construction) would generate emissions of CO, ROG, NOx, SOx, PM₁₀, and PM_{2.5}. Please refer to: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021, IS/MND Appendix A (Project AQIA/GHGA/HRA) for details regarding equipment use, construction timeframes and other CalEEMod inputs and related construction-source emissions modeling. SCAQMD regional thresholds for construction-source emissions are presented at Table 3-2. Project construction-source emissions in the context of SCAQMD regional thresholds are presented at Table 3-3.

**Table 3-2
SCAQMD Regional Thresholds – Construction-Source Emissions**

Pollutant	Threshold
NOx	100 lbs./day
VOC	75 lbs./day
PM ₁₀	150 lbs./day
PM _{2.5}	55 lbs./day
SOx	150 lbs./day
CO	550 lbs./day

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

As indicated at Table 3-3, Project construction-source emissions would not exceed applicable SCAQMD regional thresholds. The potential for Project construction-source emissions to result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard would therefore be less-than-significant.

**Table 3-3
Maximum Daily Construction-Source Emissions (pounds per day)**

Year	Emissions (lbs./day)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Summer						
2022	4.59	73.83	32.63	0.22	29.92	6.87
2023	66.19	71.75	85.58	0.23	17.45	6.49
Winter						
2022	4.59	75.79	32.80	0.22	29.92	6.87
2023	66.39	72.21	83.08	0.22	17.45	6.49
Maximum Daily Emissions	66.39	75.79	85.58	0.23	29.92	6.87
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Operational-Source Air Pollutant Emissions

Project operations (e.g., vehicle trips, landscaping, on-going site/building maintenance, onsite equipment operations) would generate emissions of CO, ROG, NOx, SOx, PM10, and PM2.5. Additionally, fuel transfer, fuel storage, and fuel dispensing associated with the Project gas station would be a source of VOCs. Please refer to the Project AQIA/GHGA/HRA for details regarding trip generation, landscaping, maintenance time frames, fuel station operations, associated CalEEMod inputs and related operational-source emissions modeling. SCAQMD Regional Thresholds for operational-source emissions are presented at Table 3-4.

**Table 3-4
SCAQMD Regional Thresholds – Operational-Source Emissions**

Pollutant	Threshold
NOx	55 lbs./day
VOC	55 lbs./day
PM10	150 lbs./day
PM2.5	55 lbs./day
SOx	150 lbs./day
CO	550 lbs./day

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

The site is currently developed with 748,269 sf of office buildings. Estimated operational-source emissions from the existing development is summarized at Table 3-5. Estimated Project operational-source emissions and net emissions impacts of the Project when compared to existing conditions are summarized at Table 3-6. In this latter regard, operational-source emissions that would be generated by the existing uses were appropriately subtracted from the Project operational-source emissions to determine net emissions impacts of the Project. As presented at Table 3-6, Project operational-source emissions would not exceed applicable SCAQMD thresholds and would therefore be less-than-significant.

**Table 3-5
Existing Uses Operational-Source Emissions**

Emissions Source	Emissions (lbs./day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Summer						
Area Sources (Landscaping, Site/Building Maintenance, etc.)	17.14	2.58E-03	0.28	2.00E-05	1.01E-03	1.01E-03
Building Energy Consumption (HVAC Systems)	0.20	1.82	1.53	0.01	0.14	0.14
Mobile Sources (Traffic)	21.97	22.47	223.78	0.49	49.77	13.49
Total Maximum Daily Emissions	39.31	24.30	225.59	0.50	49.91	13.63
Winter						
Area Source	17.14	2.58E-03	0.28	2.00E-05	1.01E-03	1.01E-03
Energy Source	0.20	1.82	1.53	0.01	0.14	0.14
Mobile Source	21.57	24.29	218.66	0.47	49.77	13.49
Total Maximum Daily Emissions	38.91	26.11	220.47	0.48	49.91	13.63

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

ENVIRONMENTAL ISSUES:

Sources **Potentially Significant Impact** **Less-Than-Significant Impact With Mitigation** **Less-Than-Significant Impact** **No Impact**

**Table 3-6
Project Operational-Source Emissions**

Emissions Source	Emissions (lbs./day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
<i>Summer</i>						
Project Emissions						
Area Source	16.76	2.49E-03	0.27	2.00E-05	9.80E-04	9.80E-04
Energy Source	0.20	1.77	1.49	0.01	0.13	0.13
Mobile Source	8.13	44.91	90.80	0.35	24.25	6.74
On-Site Equipment Source	0.33	3.11	2.25	9.50E-03	0.11	0.10
Project-Total Daily Emissions	25.41	49.80	94.81	0.37	24.50	6.98
Existing Conditions-Total Daily Emissions	39.31	24.30	225.59	0.50	49.91	13.63
Net Emissions (Project – Existing)	-13.90	25.50	-130.78	-0.13	-25.42	-6.65
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
<i>Winter</i>						
Project Emissions						
Area Source	16.76	2.49E-03	0.27	2.00E-05	9.80E-04	9.80E-04
Energy Source	0.20	1.77	1.49	0.01	0.13	0.13
Mobile Source	7.98	47.17	88.48	0.34	24.25	6.74
On-Site Equipment Source	0.33	3.11	2.25	9.50E-03	0.11	0.10
Project-Total Daily Emissions	25.26	52.06	92.49	0.36	24.50	6.98
Existing Conditions-Total Daily Emissions	(38.91)	(26.11)	(220.47)	(0.48)	(49.91)	(13.63)
Net Emissions (Project – Existing)	-13.65	25.95	-127.98	-0.11	-25.41	-6.65
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

Localized Impacts

Localized Significance Threshold Analysis

Per SCAQMD significance criteria, air quality impacts are potentially significant if there is a potential to contribute to or cause localized exceedances of the national and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, the NAAQS/CAAQS establish Localized Significance Thresholds (LSTs).

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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LSTs were developed in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. More specifically, to address potential Environmental Justice implications of localized air pollutant impacts, the SCAQMD adopted LSTs indicating whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable national or state ambient air quality standard. Use of LSTs by local government is voluntary. Lead agencies may employ LSTs as another indicator of significance in air quality impact analyses.

Emissions Considered/Methodology

LSTs apply to carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter less than 10 microns (PM₁₀), and particulate matter less than 2.5 microns (PM_{2.5}). The Project LST analysis incorporates, and is consistent with, protocols and procedures established by the SCAQMD Final Localized Significance Threshold Methodology (Methodology). The Methodology clearly states that "off-site mobile emissions from the Project should NOT be included in the emissions compared to LSTs." Therefore, for purposes of the LST analysis, only "on-site" emissions were considered. See also: <http://aqmd.gov/ceqa/handbook/LST/LST.html>.

Sensitive Receptors

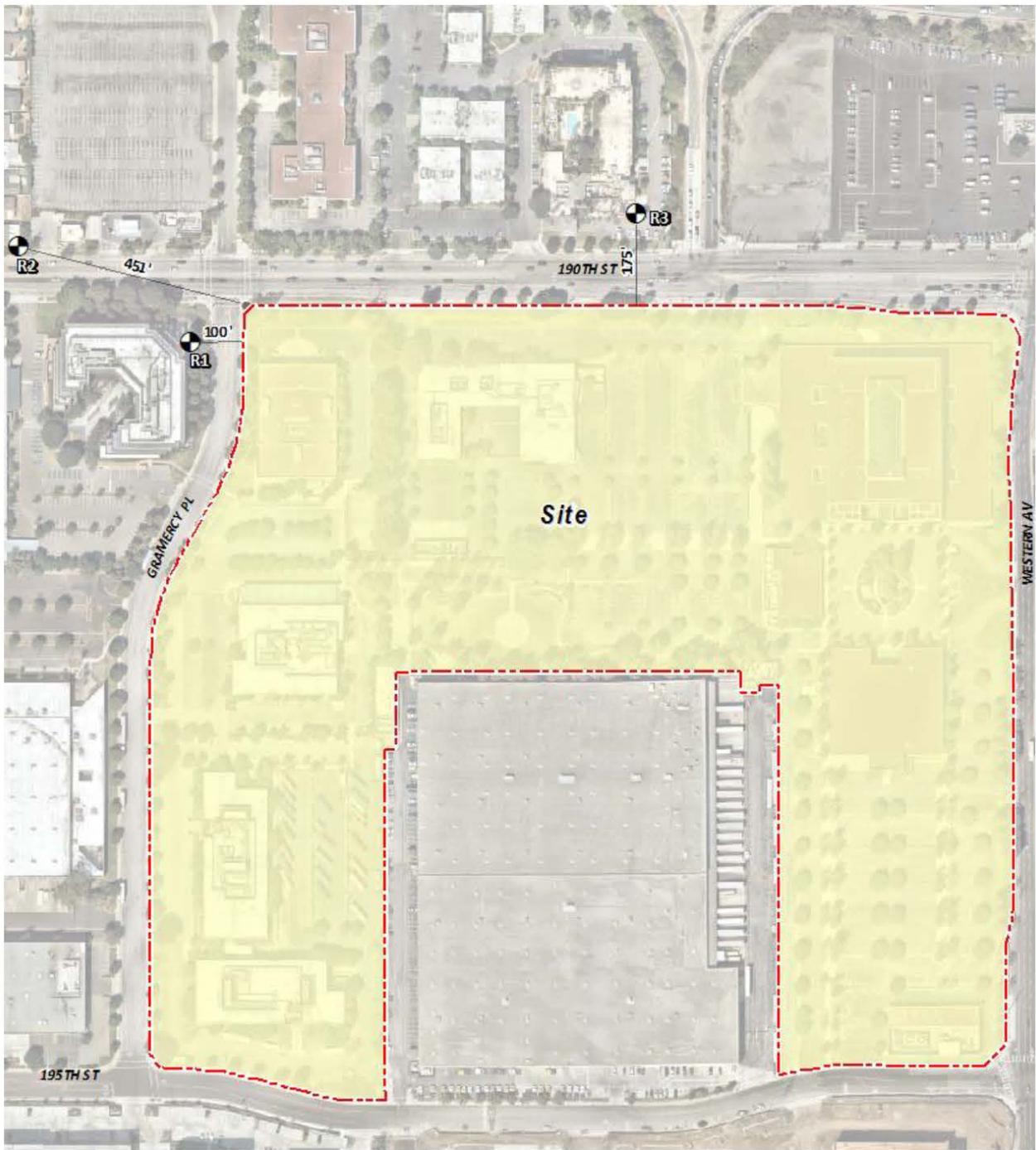
As provided for under the Methodology, potential localized emissions impact have been evaluated at sensitive receptors proximate to the Project site. "Sensitive receptors" are off-site locations where individuals may be exposed to Project-source air pollutant emissions. The LST analysis presented here evaluates localized construction-source and operational-source emissions impacts at the nearest sensitive receptors. Sensitive receptors evaluated for purposes of determining LST impacts are indicated at Figure 3-5.

Residential Receptors – Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as sensitive receptors; they are also known to be locations where an individual can remain for 24 hours. The nearest receptor used for evaluation of localized impacts of PM₁₀ and PM_{2.5} is represented by the Sonesta Select Los Angeles Torrance hotel at 1925 West 195th Street, approximately 175 feet (53 meters) north of the Project site.

Non-Residential Receptors – Per the LST Methodology, commercial, office, and industrial facilities are not included in the definition of sensitive receptors because employees and visitors do not typically remain onsite for a full 24 hours but are typically onsite for approximately eight hours. The LST Methodology also notes . . . "LSTs based on shorter averaging periods, such as the NO₂ and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours. Consistent with the SCAQMD's Final LST Methodology recommendations, localized NO₂ and CO impacts affecting industrial or commercial uses have been evaluated.

The SCAQMD recommends that the nearest sensitive receptor be considered when determining a given project's potential localized air quality impacts. The nearest land use where an individual could remain for 24 hours has been used to determine Project LST impacts for emissions of PM₁₀ and PM_{2.5} (since PM₁₀ and PM_{2.5} thresholds are based on a 24-hour averaging time). The nearest receptor used for evaluation of localized impacts of PM₁₀ and PM_{2.5} is represented by the Sonesta Select Los Angeles Torrance hotel at 1925 West 195th Street, approximately 175 feet (53 meters) north of the Project site.

Per SCAQMD guidance, the nearest industrial/commercial use has been used to determine localized NO_x and CO emissions impacts as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assume that an individual could be present at industrial/commercial sites for periods of one to 8 hours. The nearest receptor used for evaluation of localized NO_x and CO emissions is represented by the industrial park use located across Gramercy Place, approximately 100 feet (31 meters) west of the Project site.



LEGEND:

- Site Boundary
- Distance from receiver to Project site boundary (in feet)
- Receiver Locations



NOT TO SCALE
 Source: Urban Crossroads, Inc.; Applied Planning, Inc.

Figure 3-5
 Sensitive Receptor Locations

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Construction-Source Emissions LST Analysis

Peak daily localized construction-source emissions received at the nearest receptors is summarized at Table 3-7. Applicable SCAQMD LSTs are also presented. As indicated, Project localized construction-source emissions would not exceed applicable LSTs. Project localized construction-source emissions impacts would therefore be less-than-significant.

**Table 3-7
Maximum Construction-Source Localized Emissions (pounds per day)**

	Pollutant			
	NO _x	CO	PM ₁₀	PM _{2.5}
Peak Daily Total	50.35	28.08	24.32	6.75
SCAQMD Localized Threshold	195	1,841	45	10
Threshold Exceeded?	No	No	No	No

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

Operational-Source Emissions LST Analysis

LST analyses appropriately consider only emissions generated by on-site sources. In this regard, the Project operational-source emissions LST analysis evaluates emissions that would be generated by on-site stationary/area-sources and also captures emissions that would be generated by on-site traffic. Table 3-8 presents the Project's maximum potential localized operational-source emissions. Applicable SCAQMD localized significance thresholds are also presented. As indicated, Project operational-source air pollutant emissions would not exceed applicable SCAQMD LSTs and would therefore be less-than-significant.

**Table 3-8
Maximum Operational-Source Localized Emissions (pounds per day)**

	Pollutant			
	NO _x	CO	PM ₁₀	PM _{2.5}
On-site Emissions	7.24	8.55	1.46	0.58
SCAQMD Localized Threshold	195	1,841	12	3
Threshold Exceeded?	No	No	No	No

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

Localized CO "Hot Spots"

Area CO "Hot Spots" are the product of vehicle-source CO emissions that are concentrated by vehicles idling at congested intersections. Adverse CO concentration impacts occur when exceedance of the state one-hour CO concentration standard of 20 ppm, or eight-hour CO concentration standard of 9 ppm occur.

Baseline CO concentrations affecting the region are reflected in the 2003 SCAQMD CO Hot Spot Modeling Analysis. The Hot Spot Modeling Analysis (Modeling Analysis) evaluated CO concentrations at four busy representative Los Angeles intersections under peak morning and afternoon traffic conditions. Even under these congested conditions, the Modeling Analysis did not predict any violation of CO standards, as shown at Table 3-9.

ENVIRONMENTAL ISSUES:

Potentially Significant Impact **Less-Than-Significant Impact With Mitigation** **Less-Than-Significant Impact** **No Impact**

**Table 3-9
SCAQMD CO Hot Spot Modeling Analysis Results**

Intersection Location	CO Concentrations (ppm)		
	Morning 1-hour	Afternoon 1-hour	8-hour
Wilshire Boulevard/Veteran Avenue	4.6	3.5	3.7
Sunset Boulevard/Highland Avenue	4	4.5	3.5
La Cienega Boulevard/Century Boulevard	3.7	3.1	5.2
Long Beach Boulevard/Imperial Highway	3	3.1	8.4

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

Peak carbon monoxide concentrations in the region at the time the Modeling Analysis was conducted were a product of unusual meteorological and topographical conditions, and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, of the 8.4 ppm 8-hr CO concentration measured at the Long Beach Blvd. and Imperial Hwy. intersection (highest CO generating intersection within the Modeling Analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, an adverse CO concentration (Hot Spot) would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur.

The ambient 1-hr and 8-hr CO concentrations within the Project Study Area are estimated to be 1.5 ppm and 1.2 ppm respectively (data from Metropolitan Riverside County station for 2019). Therefore, even if the Project traffic volumes were double or even triple of the traffic volumes generated at the Long Beach Blvd. and Imperial Hwy. intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO Hot Spot at any Study Area intersection.

Traffic volumes generating the CO concentrations for the Modeling Analysis are presented at Table 3-10. The busiest intersection evaluated was the Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vph and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively. The Modeling Analysis estimated that the morning 1-hour CO concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day at the subject intersection, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm).

**Table 3-10
SCAQMD CO Hot Spot Modeling Analysis
Traffic Volumes**

Intersection Location	Peak Traffic Volumes (vph)				
	Eastbound (AM/PM)	Westbound (AM/PM)	Southbound (AM/PM)	Northbound (AM/PM)	Total (AM/PM)
Wilshire Boulevard/Veteran Avenue	4,954/2,069	1,830/3,317	721/1,400	560/933	8,062/7,719
Sunset Boulevard/Highland Avenue	1,417/1,764	1,342/1,540	2,304/1,832	1,551/2,238	6,614/5,374
La Cienega Boulevard/Century Boulevard	2,540/2,243	1,890/2,728	1,384/2,029	821/1,674	6,634/8,674
Long Beach Boulevard/Imperial Highway	1,217/2,020	1,760/1,400	479/944	756/1,150	4,212/5,514

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, corollary analyses conducted by other Air Districts (in this case, the Bay Area Air Quality Management District [BAAQMD]) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph)—or 24,000 vph where vertical and/or horizontal air does not mix—in order to generate a significant CO impact.

As shown at Table 3-11, the highest Project-source AM/PM traffic volumes in the Study Area (4,991 vph am and 5,526 vph pm) would occur at the Western Avenue/190th Street intersection. Project-source traffic volumes at this location are substantially less than the traffic volumes identified in the Modeling Analysis, or similar parameters employed by the BAAQMD. The Project considered herein would not produce the volume of traffic required to generate a CO Hot Spot in the context of the Modeling Analysis, or traffic volumes employed by the BAAQMD in screening for potential CO Hot Spots. Therefore, CO Hot Spots are not an environmental impact of concern for the Project. Localized air quality impacts related to CO emissions concentrations would therefore be less-than-significant.

**Table 3-11
Project Traffic Volumes**

Intersection Location	Peak Traffic Volumes (vph)				
	Eastbound (AM/PM)	Westbound (AM/PM)	Southbound (AM/PM)	Northbound (AM/PM)	Total (AM/PM)
Gramercy Place/ 190th Street	1,093/28	77/18	1,303/1,769	1,093/831	3,566/2,646
Western Avenue/ I-405 NB Ramps	966/433	1,753/1,451	523/579	0/0	3,242/2,463
Western Avenue/ 190th Street	1,335/1,701	1,800/1,489	657/1,373	1,199/963	4,991/5,526
Western Avenue/ Del Amo Boulevard	1,183/1,514	1,250/1,547	43/131	792/467	3,268/3,659

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

Localized Diesel Particulate Matter (DPM) Emissions Impacts

Construction equipment employed in development of the Project, and truck traffic associated with Project operations would generate Diesel Particulate Matter (DPM) emissions. In 1998, the California Air Resources Board (ARB) identified particulate matter from diesel-fueled engines (Diesel Particulate Matter or DPM) as a Toxic Air Contaminant (TAC). In California, diesel engine exhaust has been identified as a carcinogen.

Carcinogenic Risks

The SCAQMD CEQA Air Quality Handbook (1993) states that emissions of TACs are considered significant if a Health Risk Assessment shows an increased carcinogenic risk of greater than 10 incidents per million population. Consistent with the stated SCAQMD Handbook cancer risk threshold, for the purposes of this analysis, an increase in cancer risk of 10 incidents per million population is considered significant. Also relevant to the Project HRA, specific guidance in determining health risks from diesel emissions is provided in Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (SCAQMD) 2003.

Noncarcinogenic Risks

An evaluation of the potential noncarcinogenic effects of chronic exposures was also conducted. Noncarcinogenic adverse health effects are evaluated by comparing a compound's annual concentration with its toxicity factor or Reference Exposure Level (REL). The REL for diesel particulates was obtained from Office of Environmental Health Hazard Assessment (OEHHA) for this analysis. The REL for DPM established by OEHHA is 5 µg/m3 (OEHHA Toxicity Criteria Database, <http://www.oehha.org/risk/chemicaldb/index.asp>).

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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The SCAQMD has established non-carcinogenic risk parameters for use in HRAs. Non-carcinogenic risks are quantified by calculating a Hazard Index, expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A Hazard Index less than one (1.0) means that adverse health effects are not expected. Within this analysis, non-carcinogenic exposures not exceeding the SCAQMD Hazard Index of 1.0 are considered less-than-significant.

Risk Exposure: Quantification Results

Construction-Source DPM Emissions Impacts

As substantiated in the Project AQIA/GHGA/HRA, Project construction-source DPM emissions cancer risk impacts at the maximally exposed individual receptor (MEIR) would be 0.37 in one million, which is less than the SCAQMD threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable SCAQMD threshold of 1.0 (Project AQIA/GHGA/HRA, p. 22). As such, Project construction-source DPM emissions would not cause a significant human health or cancer risk at any potentially affected receptors.

Operational-Source DPM Emissions Impacts

As substantiated in the Project AQIA/GHGA/HRA, Project operational-source DPM emissions cancer risk impacts at the MEIR would be 0.86 in one million, which is less than the SCAQMD threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable SCAQMD threshold of 1.0 (Project AQIA/GHGA/HRA, p. 22). As such, Project operational-source DPM emissions would not cause a significant human health or cancer risk at any potentially affected receptors.

Based on the preceding, the potential for the Project to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard is considered less-than-significant.

(c) Expose sensitive receptors to substantial pollutant concentrations?	10, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As substantiated in the above discussion of Localized Air Quality Impacts, sensitive receptors nearest the Project site would not be subject to emissions exceeding SCAQMD LSTs. Further, Project construction and operations would not result in potentially significant DPM-source health risk impacts. Project construction or operations would not otherwise generate emissions that would expose sensitive receptors to substantial pollutant concentrations. Additionally, Project traffic would not create or result in a CO “hotspot.” Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project operations. On this basis, the potential for the Project to expose sensitive receptors to substantial pollutant concentrations is considered less-than-significant. Relevant case law (Friant Ranch Case) further supporting these conclusions is summarized below.

Friant Ranch Case

In December 2018, in the case of Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, (Friant Ranch) the California Supreme Court held that an Environmental Impact Report’s (EIR) air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided.

As discussed in the SCAQMD Brief filed in the Friant Ranch case, correlating a project’s criteria air pollutant emissions to specific health impacts is challenging. The SCAQMD, which has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes noted that it may be “difficult to quantify health impacts for criteria pollutants.” SCAQMD used O₃ as an example of why it is impracticable to determine specific health outcomes from criteria pollutants for all but very large, regional-scale projects. First, forming O₃ “takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources.” Second, “it takes a large amount of additional precursor emissions (NO_x and VOCs) to cause a modeled increase in ambient ozone levels over an entire region,” with a 2012 study showing that “reducing NO_x by 432

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion" (Project AQIA/GHGA/HRA, p. 20).

SCAQMD concluded that it "does not currently know of a way to accurately quantify ozone-related health impacts caused by NO_x or VOC emissions from relatively small projects." The San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) ties the difficulty of correlating the emission of criteria pollutants to health impacts to how ozone and particulate matter are formed, stating that "[b]ecause of the complexity of ozone formation, a specific tonnage amount of NO_x or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area." Similarly, the tonnage of PM "emitted does not always equate to the local PM concentration because it can be transported long distances by wind," and "[s]econdary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as sulfur dioxides (SO_x) and NO_x," meaning that "the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area." The disconnect between the amount of precursor pollutants and the concentration of ozone or PM formed makes it difficult to determine potential health impacts, which are related to the concentration of ozone and PM experienced by the receptor rather than levels of NO_x, SO_x, and VOCs produced by a source (Project AQIA/GHGA/HRA, pp. 22 – 23).

Most local agencies lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in cause asthma), existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Rather, readers are directed to the Project AQIA/GHGA/HRA summarized herein and presented in full at IS/MND Appendix A, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction-source and operational-source air pollutant emissions.

The LST analysis presented herein substantiates that the Project would not result in any air pollutant emissions exceeding SCAQMD LSTs. Therefore, the Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_x, PM₁₀, and PM_{2.5}.

As the Project's emissions would comply with federal, state, and local air quality standards, the Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and would not provide a reliable indicator of health effects if modeled. Please refer also to the Project Health Risk Assessment that specifically addresses potential cancer risks associated with Project-source DPM emissions.

- | | | | | | | |
|-----|--|--------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (d) | Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | 10, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|--|--------|--------------------------|--------------------------|-------------------------------------|--------------------------|

Temporary and intermittent odor releases may occur during construction of Project uses. Potential construction-source odors include but are not limited to diesel exhaust, asphalt/paving materials, glues, paint, and other architectural coatings. The Project light industrial/commercial uses do not comprise facilities or operations that would create objectionable odors affecting a substantial number of people. Construction-source and operational-source odor impacts are limited as a byproduct of mandated hazardous/potentially hazardous materials handling plans and provisions of SCAQMD Rule 402. The Project would comply with all SCAQMD Rules regulating and controlling odors and odor sources.

Based on the preceding, the potential for the Project to result in other emissions including odors adversely affecting a substantial number of people is considered less-than-significant.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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4. BIOLOGICAL RESOURCES. Would the project:

- (a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? 6, 7, 17

The Project site is fully developed with (vacant) light industrial/business park uses and is devoid of candidate, sensitive, or special status species. The Project does not propose or require uses or facilities that would result in potentially significant impacts to offsite candidate, sensitive, or special status species. The Project does not conflict with any conservation plans for the site. The Project would be required to conform to applicable biological resources protective regulations and conditions of approval. On this basis, the potential for the Project to have a substantial adverse effect on sensitive species is considered less-than-significant.

- (b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? 6, 7, 17

The Project site is fully developed with (vacant) light industrial/business park uses. The Project site is not located within a sensitive biological area, or a designated conservation or habitat area. No riparian habitat or other sensitive natural community exists within the Project site. Implementation of the Project would not substantively affect any riparian habitat or other sensitive natural community.

- (c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? 6, 7, 17

The Project site is fully developed with (vacant) light industrial/business park uses. No federally-protected wetlands areas exist within the Project site or in surrounding areas. This environmental concern is thus not applicable to implementation of this proposal. The Project will have no impact on wetlands habitat.

- (d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? 6, 7, 17

The Project site is fully developed with vacant light industrial/business park uses. No wildlife corridors, wildlife linkages, or wildlife nurseries are located onsite. the project does not propose or require facilities or uses that would affect any offsite wildlife corridors, wildlife linkages, or wildlife nurseries. Further, the site is bounded on all sides by roads and/or urban development, diminishing its potential to function as a wildlife movement corridor. The Project would be required to conform to applicable biological resources protective regulations and conditions of approval.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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However, the Project involves the removal or demolition of all existing site features, including removal of existing mature trees within the Project site. These trees have the potential to provide suitable nesting habitat for raptors and other unknown migratory non-game native bird species. Removal of these trees during the bird breeding season has the potential to result in significant impacts to nesting birds. Any potentially significant adverse impacts related to nesting birds would be maintained at levels that would be less-than-significant with incorporation of the following mitigation measure:

BIO-1: Prior to the issuance of demolition or grading permits, the Applicant shall incorporate the following notes on any demolition or grading plans:

“Unless as provided for otherwise below, the Applicant shall remove trees during the non-breeding season (September 1 to end of February) in order to comply with the Federal Migratory Bird Treaty Act and avoid potential takes of active nests including raptors and other migratory non-game birds. If the Applicant has not removed the trees during the non-breeding period and intends to commence construction during March 1 through August 31 (breeding season), the Applicant shall have a USFWS/CDFG approved biologist (Project Biologist) conduct weekly bird surveys.

These surveys shall substantiate the presence/absence of protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allow. The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of clearance/ construction work. If a protected native bird is found, the Applicant shall delay all tree clearance/construction disturbance activities within 300 feet of suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the Project Biologist shall continue survey efforts in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by the Project Biologist shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest shall be established in the field with flagging and stakes or construction fencing marking the protected area 300 feet (or 500 feet) from the nest. Construction personnel shall be instructed on the sensitivity of the area. The Project Biologist shall record the results of the protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.”

With incorporation of Mitigation Measure BIO-1, the potential for the Project to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites is considered less-than-significant.

- (e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? 5, 6, 7, 17

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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The Project site is not subject to or otherwise affected by a local tree preservation ordinance or other local ordinances protecting biological resources. The Project site is located in a largely urbanized area bordered by development on all sides and has been heavily disturbed. The existing condition of the Project site is an industrial business park and parking areas. There are no biologically significant resources within the Project site; nor are there any local ordinances or area-wide preservation or conservation plans or policies, such as a tree preservation policy, applicable to the Project site. The Project site is not located on or near any street designated as a special area for street trees (Figure CR-6, Special Designated Areas for Street Trees, of the City of Torrance General Plan). On this basis, the Project would have no potential to conflict with a local tree preservation ordinance or local other ordinances protecting biological resources.

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|---|----------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | 6, 7, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|----------|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Project site is not located within or otherwise affected by a habitat conservation plan or natural community conservation plan. The Project does propose or require development or activities that would otherwise conflict with the provisions of an adopted Habitat Conservation Plan or Natural Community Conservation Plan. On this basis, the Project would have no potential to conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan.

5. CULTURAL RESOURCES. Would the project:

- | | | | | | |
|---|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? | 9, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Project site is fully developed with contemporary (vacant) light industrial/business park uses. There are no known or probable historic resources within the subject site. Per the Community Resources Element of the City of Torrance General Plan, the Project site is not listed as a location of historic interest to the City, nor is the Project site registered under the State or National Register of Historic Places. The Project site is located in a largely urbanized area bordered by development on all sides. The other structures in the Project vicinity do not have any unusual characteristics and are not known to be associated with any national, regional, or local figures of significance that would qualify them as a historical resource or of historic significance. The Project site is devoid of any evident historic resources, archaeological resources, unique geologic resources, or presence of human remains. The Project site has been heavily disturbed by past human activities; Any cultural resources that may have been present at one time have likely been destroyed. Demolition and preparation of the construction site are not likely to disturb existing subsurface soil and are not likely to encounter any unknown historical resources that may remain.

To confirm the continued absence of potentially significant cultural resources, a California Historical Resources Information System (CHRIS) Records Search Report and a Native American Heritage Commission (NAHC) Sacred Lands File Report were requested. The CHRIS Report provided results, which were "negative," indicating there is no significant resources at the Project site nor within the USGS Torrance, CA 7.5' Topographic Map. Please refer also to the CHRIS Records Search Report presented at IS/MND Appendix B.

Based on the preceding, the potential for the Project to cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064 is considered less-than-significant.

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|--|-------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| (b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | 9, 17 | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|-------|--------------------------|-------------------------------------|--------------------------|--------------------------|

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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As discussed at Checklist Item 5a, there is no substantiated potential for the Project to cause or result in an adverse change in historic resources, archaeological resources, unique geologic features, or to disturb human remains. The Project site has been heavily disturbed by past human activities and is currently developed with (vacant) industrial business park buildings and parking areas. Any archaeological resources that may have been present at one time have likely been destroyed. Demolition and preparation of the construction site are not likely to disturb existing subsurface soil and are not likely to encounter any unknown archaeological resources that remain. However, although unlikely, implementation of the Project could potentially uncover and impact previously unknown archaeological resources. Any significant adverse impacts related to buried archaeological resources would be maintained at levels that would be less-than-significant with the incorporation of the following mitigation measure:

CR-1: In the event that any archaeological materials are encountered during construction activities, all activities shall be suspended in the vicinity of the find. A Project Archaeologist shall be retained and empowered to halt or divert ground disturbing activities. The Project Archaeologist shall coordinate with Native American Tribal or Band monitors interested in monitoring the remaining on-site grading and excavation activities. The Project Archaeologist shall establish a Cultural Resources Treatment and Monitoring Agreement (Agreement) between the property owner and participating Band or Tribe.

Such Agreement shall include terms for compensation for on-site monitoring and address the treatment and final disposition of any Tribal Cultural Resources, sacred sites and human remains (finds) that are discovered during Project grading and excavation. Said Agreement shall be instituted and completed before ground-disturbing activities can recommence in the area of the find to allow for the recovery of the find. The Project Archaeologist shall describe the find in a Professional Report. The Report shall receive reasonable wide distribution. Any recovered finds shall be prepared to the point of identification. The property owner(s) shall relinquish ownership of all Native American cultural resources to the appropriate local Tribe or Band for treatment and disposition. If determined to be of non-Native American scientific/historical value, recovered materials shall be deposited with a local institution with facilities for their proper curation, analysis, and display. Final disposition and location of any non-Native American recovered materials shall be determined by the City of Torrance.

With incorporation of Mitigation Measure CR-1, the potential for the Project to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064 is considered less-than-significant.

(c) Disturb any human remains, including those interred outside of formal cemeteries?	9, 17	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As discussed at Checklist Item 5a there is no substantiated potential for the Project to cause or result in an adverse change in historic resources, archaeological resources, unique geologic features, or to disturb human remains. The Project site has been heavily disturbed by past human activities and is currently developed with (vacant) industrial business park buildings and parking areas. Any human remains that may have been present at one time have likely been destroyed.

Demolition and preparation of the construction site are not likely to disturb existing subsurface soil and are not likely to encounter any unknown human remains that may be present. Although unlikely, implementation of the Project could potentially uncover and impact previously undiscovered human remains. Any potentially significant adverse impacts related to buried human remains would be maintained at levels that would be less-than-significant with the incorporation of the following mitigation measure:

CR-2: If human remains of any kind are encountered during site disturbing activities, the requirements of CEQA Guidelines Section 15064.5(e) and AB 2641 shall be followed. According to these requirements, all construction activities shall cease immediately and the Los Angeles County Coroner (Coroner) and a qualified archaeologist shall be notified. The Coroner shall examine the remains and determine the next appropriate action based on his or her findings. If the Coroner determines the remains to be of Native American origin, he or she shall notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the most likely descendants (MLD) to be consulted regarding treatment and/or reburial of the remains. If an MLD cannot be identified, or the MLD fails to make a recommendation regarding the treatment of the remains within 48 hours

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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after gaining access to them, the Native American human remains and associated grave goods shall be buried with appropriate dignity on the property in a location not subject to further subsurface disturbance.

With incorporation of Mitigation Measure CR-2, the potential for the Project to disturb any human remains, including those interred outside of formal cemeteries is considered less-than-significant.

6. ENERGY. Would the project:

(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	10, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Overview

CEQA Guidelines (Guidelines) Appendix F Energy Conservation establishes parameters and context for determining whether a project would result in the inefficient, wasteful, and unnecessary consumption of energy. Guidelines Section 15126.2 Consideration and Discussion of Significant Environmental Impacts, as amended December 28, 2018, recognizes the need to consider Guidelines Appendix F Energy Conservation when analyzing project impacts. In this regard, Guidelines Section 15126.2 (b), excerpted below, provides the following direction:

Energy Impacts. If analysis of the project’s energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources, the EIR [MND] shall mitigate that energy use. This analysis should include the project’s energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project’s size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project. (Guidance on information that may be included in such an analysis is presented in Guidelines Appendix F.) This analysis is subject to the rule of reason and shall focus on energy use that is caused by the project. This analysis may be included in related analyses of air quality, greenhouse gas emissions, transportation or utilities in the discretion of the lead agency.

The analysis presented here conforms to Guidelines Section 15126.2 (b) guidance. In summary, the Project would provide for, and promote, energy efficiencies consistent with applicable state or federal standards and regulations. The Project would also conform to City of Torrance energy efficiency and energy conservation measures.

Existing Conditions

Electricity

The California Energy Commission (CEC) provides forecasts for electricity and natural gas demand every two years as part of the Integrated Energy Policy Report (IEPR) process.³ The forecasts include 3 energy demand cases (low, mid, and high) designed to capture a reasonable range of demand outcomes over the next 10 years. The high energy demand case incorporates relatively high economic/demographic growth, relatively low electricity and natural gas rates, and relatively low committed efficiency program, self-generation, and climate change impacts. The low energy demand case includes lower economic/demographic growth, higher assumed rates, and higher committed efficiency program and self-generation impacts. The mid case uses input assumptions at levels between the high and low cases. The forecasts include estimates of the effects of new legislation and trends in electric consumption such as the use

³ See also: <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update>

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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of zero-emission automobiles. IEPR data indicates relatively stable consumption rates from 2005 through 2018, with an increase in consumption beginning in 2020.

Southern California Edison (SCE) is the electrical utility provider for the City of Torrance. SCE also provides information on energy efficiency, rotating outages, emergency preparedness, electrical safety tips, and tree planting guidelines to ensure non-interference with electrical utility lines.

Transportation Energy

California is home to 30 million registered cars, trucks, buses, and other motorized on-road vehicles. The state’s history has been, in part, a history of the automobile and the associated impacts on personal mobility, land-use planning, and air quality. In recognition of these challenges, California has enacted a suite of policies and goals to shift the transportation sector toward cleaner, sustainable fuels and more efficient technology vehicles. IEPR data indicates very stable consumption rates for jet fuel and diesel through 2030. Gasoline consumption is forecasted to decline through 2030.

Natural Gas

Natural gas is an important energy source for California. Natural gas provides energy to heat homes, cook food, and generate electricity. Currently in California, natural gas serves more than 10.5 million homes, about 445,000 businesses, about 37,000 factories and industrial consumers, and more than 640 electric generating units. The greatest consumers of natural gas in decreasing order are electric power generation, residential, industrial, mining, commercial, and other. IEPR data generally shows a decreasing reliance on natural gas through 2024. The CEC indicates increased reliance on natural gas for power generation between 2024 and 2026 due to expiration of long-term power supply contracts (purchase agreements) with coal facilities outside California.

Southern California Gas Company (SoCalGas) provides natural gas to the City of Torrance. SoCalGas also provides customers with appliance services, an energy efficiency and rebate program, and information on emergency preparedness and air quality.

Project Energy Consumption

Project construction and operational energy consumption estimates are summarized below. Please refer also to detailed energy consumption modeling and spread sheet calculations presented in the Project AQIA/GHGA/HRA, IS/MND Appendix A.

Construction Energy Consumption

Sources of Project construction energy consumption include: electrical energy consumed during construction, fuel consumed by construction equipment, and fuel consumed by employees and vendors.

Total electricity consumption from on-site Project construction activities over the approximately 14-month construction period is estimated at approximately 505,324 kWh (Project AQIA/GHGA/HRA, p. 30).

Project construction equipment would consume diesel fuel. The aggregate diesel fuel consumption rate for all equipment is estimated at 18.5 hp-hr.-gal., obtained from California Air Resources Board (CARB) Emissions Factors Tables. Diesel fuel would be supplied by existing commercial fuel providers serving the City and region. Total diesel fuel consumption from on-site Project construction activities over the approximately 14-month construction period is estimated at approximately 119,000 gallons of diesel fuel (Project AQIA/GHGA/HRA, p. 30).

Construction worker trips would comprise Light Duty Auto (LDA) travel along area roadways. LDAs are powered by gasoline. Over the approximately 14-month construction period, construction worker trips would consume an estimated 68,563 gallons of gasoline (Project AQIA/GHGA/HRA, p. 32).

Diesel fuel would be consumed by medium-heavy duty truck and heavy-heavy duty vendor truck trips. Over the approximately 14-month construction period, construction vendor trips would consume approximately 70,395 gallons of diesel fuel (Project AQIA/GHGA/HRA, p. 33).

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Diesel fuel and gasoline for construction activities would be provided by existing area vendors. Construction electricity demands would be provided through connection to existing SCE services.

Project construction activities would comprise temporary, single-event demands for diesel fuel and electricity and would not require on-going or permanent commitment of fuel for these purposes.

Operational Energy Consumption

The Project would replace existing development within the Project site. The following discussions identify net operational energy consumption of the Project after accounting for estimated energy consumption of the existing site uses.

Vehicle Energy Consumption

Vehicles accessing the existing site uses would consume an estimated 690,649 gallons of fuel (diesel and gasoline) annually. Vehicles accessing the Project would consume an estimated 573,932 gallons of fuel per year, or an estimated net reduction of (116,717) gallons of fuel per year when compared to the existing site uses (Project AQIA, GHGA, HRA, pp. 33 – 35)

Building/Site Energy Consumption

Existing site development would consume an estimated 6,771,830 kBTU/year of natural gas annually. The Project uses would consume an estimated 6,606,500 kBTU/year of natural gas per year, or an estimated net reduction of (165,330) kBTU/year of natural gas per year when compared to the existing site uses (Project AQIA, GHGA, HRA, pp. 35 – 36).

Existing site development would consume an estimated 10,377,740 kWh/year of electricity. The Project uses would consume an estimated 10,017,380 kWh/year of electricity, or an estimated net reduction of (360,360) kWh/year of electricity when compared to the existing site uses (Project AQIA, GHGA, HRA, pp. 35 – 36).

As summarized above, the Project would result in a net reduction in energy consumption when compared to energy consumption of the existing site uses. The Project would meet or surpass standards established under the California Code Title 24, Part 6 (the California Energy Code) and California Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) as implemented by the City. The Project would also implement applicable efficiency/conservation measures provisions of the City of Torrance Climate Action Plan. The Project does not propose or require additional energy-producing facilities or energy delivery systems. On this basis, the potential for the Project to result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources is considered less-than-significant.

(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	10, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Project consistency with Energy Efficiency/Energy Conservation Plans and related policies and/or regulations relevant to the Project are summarized at Table 6-1. In addition to the plans, policies, and regulations listed below, the State and City have also implemented measures that reduce air pollutant emissions and greenhouse gases. As a corollary effect, these measures in part act to promote energy efficiency and reduce energy consumption. Please refer also to related discussions addressing energy conservation/energy efficiency presented at IS/MND Section 8. Greenhouse Gas Emissions.

**Table 6-1
Energy Efficiency/Energy Conservation Plan Consistency**

PLANS, POLICES, REGULATIONS	Remarks
STATE of CALIFORNIA	
California Code of Regulations (CCR) Title 24, Part 6: Energy Efficiency Standards California Code Title 24, Part 6 (also referred to as the California Energy Code), was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. To these ends, the California Energy Code provides energy efficiency standards for residential and nonresidential buildings. The Project would be required to comply with energy efficiency standards in effect at the time of building permit application(s).	Consistent: The Project would be designed, constructed and operated to meet or exceed incumbent CCR Title 24 Energy Efficiency Standards. <i>Based on the preceding, the Project is considered consistent with, and would not interfere with or obstruct implementation of CCR Title 24, Part 6: Energy Efficiency Standards.</i>
CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen). CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011. CALGreen is updated on a regular basis, with the most recent update consisting of the 2016 California Green Building Code Standards that became effective January 1, 2017. Under state law, local jurisdictions are permitted to adopt more stringent requirements.	Consistent: The Project would be designed, constructed and operated to meet or exceed incumbent CCR Title 24 CALGreen Standards. <i>Based on the preceding, the Project is considered consistent with, and would not interfere with or obstruct implementation of CCCR, Title 24, Part 11: CALGreen.</i>

Sources: CCR Title 24, Part 6: Energy Efficiency Standards; CCR, Title 24, Part 11: California Green Building Standards; Remarks by Applied Planning, Inc.

Based on the above discussion, the analysis presented previously at Checklist Item 6 (a), and at Checklist Item 8, Greenhouse Gas Emissions, the potential for the Project to conflict with or obstruct a state or local plan for renewable energy or energy efficiency is considered less-than-significant.

7. GEOLOGY AND SOILS. Would the project:

- | | | | | | | |
|-----|---|-------|---|---|---|---|
| (a) | Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | □ | □ | ☒ | □ | |
| i) | Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | 7, 17 | □ | □ | ☒ | □ |

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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There are no active faults known on the site and the Project site is located outside the Fault Rapture Hazard Zone (formerly Alquist-Priolo Zone). On this basis, the potential for the Project to cause potential substantial adverse effects due to rupture of a known earthquake fault is considered less-than-significant.

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|-----|--------------------------------|----------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| ii) | Strong seismic ground shaking? | 5, 7, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|--------------------------------|----------|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Project site is located in the seismically active Southern California region and is prone to earthquakes, which may result in hazardous conditions affecting people and structures within the region. Per the Safety Element of the City of Torrance General Plan, the greatest risks from earthquake fault zones in the City of Torrance derive from the Palos Verdes fault zone, the Puente Hills fault, the Newport-Inglewood fault zone, the Elysian Park fault zone, the Malibu Coast-Santa Monica-Hollywood fault zone, and the Whittier fault zone. However, seismic events and associated ground motion can affect a widespread area. The potential severity of ground shaking depends on many factors, including distance from the originating earthquake fault, the earthquake magnitude, and underlying soil conditions.

Although implementation of the Project has the potential to result in the exposure of people and structures to strong ground shaking during a seismic event, this exposure is no greater than exposure present in other areas throughout the Southern California region. Additionally, as part of the City's standard review and approval of development projects, the Project would be required to comply with Uniform Building Code (UBC) and California Building Code (CBC) seismic safety design and engineering requirements. Design and construction of the Project in accordance with UBC and CBC requirements minimizes potential adverse impacts of seismic events as they may affect the Project. All Project final plans would be required to incorporate design- and site-appropriate means to avoid or minimize effects of fault rupture or seismic shaking events.

Based on the preceding, the potential for the Project to cause potential substantial adverse effects, directly or indirectly, including the risk of loss, injury, or death involving strong seismic ground shaking is considered less-than-significant.

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|------|---|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| iii) | Seismic-related ground failure, including liquefaction? | 7, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|------|---|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|

According to the Safety Element of the City of Torrance General Plan, the Project site is not located within the mapped seismic-related hazard areas where there is potential to experience liquefaction-induced ground displacement (General Plan Figure S-2, Seismic-Related Hazards). Also, design and construction of the Project would be required to conform with the 2019 CBC, which establishes procedures and limitations for design of structures based on seismic risk and the type of facility. On this basis, the potential for the Project to cause potential substantial adverse effects involving seismic-related ground failure and/or liquefaction is considered less-than-significant.

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|-----|-------------|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| iv) | Landslides? | 7, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-----|-------------|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|

Per the Safety Element of the City of Torrance General Plan, the Project site is not located within the mapped seismic-related hazard areas where there is potential to experience landslides (General Plan Figure S-2, Seismic-Related Hazards). The Project site and surrounding properties are developed with improved/paved surfaces and buildings and are essentially level and exhibit little or no topographic relief. There is no evidence of recent or historic landslides affecting the Project site or vicinity properties. Based on the preceding, the Project would have no potential to cause substantial adverse effects, directly or indirectly, including the risk of loss, injury, or death involving landslides.

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|-----|--|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (b) | Result in substantial soil erosion or the loss of topsoil? | 7, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Project construction activities would temporarily expose underlying soils, thereby increasing their susceptibility to erosion until the Project is fully implemented. Potential erosion impacts incurred during construction activities are mitigated below the level of significance through the Project's mandated compliance with a City-approved Storm Water Pollution Prevention Plan (SWPPP) and compliance with SCAQMD Rules that prohibit grading activities and site disturbance during high wind events. At Project completion, potential soil erosion impacts in the area will be resolved, as pavement, roads, buildings, and landscaping are established, overcovering previously exposed soils.

The Project involves construction of conventional light industrial land uses and supporting site improvements within an essentially level area of the City. The Project does not propose to significantly alter existing topography. Any required cut/fill within the Project area will establish suitable building pads and facilitate efficient site drainage.

Based on the preceding, potential impacts associated with erosion or changes in topography are considered less-than-significant.

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|-----|---|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (c) | Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | 7, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|---|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|

There are no known liquefaction or landslide hazards in or adjacent to the Project site. Any unstable materials that may be encountered during routine geotechnical investigations and/or during ground disturbing activities would be required to be removed and replaced with properly engineered, compacted materials, in accordance with the Torrance Municipal Code and the 2019 CBC. As such, potentially significant impacts involving unstable geologic or soil materials would be avoided.

Based on the preceding, the potential for the Project to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse is considered less-than-significant.

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|-----|---|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (d) | Be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | 4, 5, 7, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|---|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

Per Expansive Soil Foundation Map for Residential Construction (City of Torrance Community Development GIS), the Project site is not located in an area affected by expansive soils. Further, a development-and-site-specific Geotechnical Investigation would be required by the City prior to the issuance of development permits. As one component of the Project Geotechnical Investigation, laboratory testing would be performed on representative Project site soils samples to determine soils suitability for development. Should expansive soils be identified, these soils would be removed and/or remediated consistent with requirements of the Project Geotechnical Investigation, City Building Department and CBC. Adherence with provisions of the Project Geotechnical Investigation, and compliance with City Building Department and CBC requirements would ensure that any areas containing expansive soils would be properly designed and engineered. On this basis, the potential for the Project to be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code and thereby result in adverse environmental impacts is considered less-than-significant.

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|-----|---|----|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (e) | Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-----|---|----|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Project would connect to the City sanitary sewer system. No septic tanks or other alternative wastewater disposal systems are proposed. On this basis, the Project would not result in any impacts related to on-site or alternative wastewater disposal systems.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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(f) Directly or indirectly destroy a unique paleontological resource or unique geologic feature?	7, 17	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Project site is fully developed with (vacant) light industrial buildings. Unique paleontological resource or unique geologic features were not encountered under previous site development activities. No known paleontological resources or unique geologic features exist within the subject site, and the site is not located near the shore of a prehistoric lakebed, streambed or other indicators for paleontological fossils; therefore, the likelihood of encountering unique paleontological resources or unique geologic features is considered remote. Moreover, any paleontological resources or unique geologic features that may have been present at one time have likely been destroyed. Specific considerations addressing potential impacts to paleontological resources and geologic features follow.

Paleontological Resources Considerations

Demolition and preparation of the construction site are not likely to disturb existing subsurface soil and are not likely to encounter any unknown paleontological resources that may be present. Although unlikely, implementation of the Project could potentially uncover and impact previously undiscovered paleontological resources. Any potentially significant adverse impacts to paleontological resources would be maintained at levels that would be less-than-significant with the incorporation of the following mitigation measure:

GS-1: In the event that any paleontological material (find) is encountered during construction activities, all activities shall be suspended in the vicinity of the find. The City shall be notified immediately and the Applicant shall retain a qualified paleontologist (Project Paleontologist) who shall determine the significance of the find. If the find is determined to be significant, it shall be salvaged and collected in compliance with the applicable regulations and sent to a local institution or museum with facilities for their proper curation, analysis, and display. The Project Paleontologist shall describe the find(s) in a professional report which shall receive reasonable wide distribution. Any recovered finds shall be prepared to the point of identification. The property owner shall relinquish ownership of all paleontological resources to the local institution or designated museum. Final disposition and location of the paleontological resources shall be determined by the City.

With incorporation of Mitigation Measure GS-1, the potential for the Project to destroy a unique paleontological resource, directly or indirectly, is considered less-than-significant.

Geological Features

With regard to unique geological features, the City has not established criteria for determining what comprises a unique geological feature. Other relevant agency criteria however indicates that a geological feature could be generally considered unique if it:

- Is the best example of its kind locally or regionally;
- Embodies the distinctive characteristics of a geologic principle that is exclusive locally or regionally;
- Provides a key piece of geologic information important in geology or geologic history;
- Is a “type locality” of a geological feature;
- Is a geologic formation that is exclusive locally or regionally;
- Contains a mineral that is not known to occur elsewhere in the County; or
- Is used repeatedly as a teaching tool.⁴

The Project site is extensively disturbed and is currently developed with (vacant) light industrial uses. Any unique geologic features that may have been present at one time have likely been destroyed. Moreover, soil types underlying the Project site are common within the City and Southern California, and do not comprise unique geological features as described above. The Project does not propose uses or activities that would indirectly contribute to or result in potentially adverse impacts to a unique geological feature.

Based on the preceding, the potential for the Project to destroy a unique geological feature, directly or indirectly, is considered less-than-significant.

⁴ County of San Diego Guidelines for Determining Significance Unique Geology (County of San Diego, Department of Planning and Land Use Department of Public Works) June 30, 2007, p. 1.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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8. GREENHOUSE GAS EMISSIONS. Would the project:

- (a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? 3, 10, 17

The City of Torrance in coordination with South Bay Cities Council of Governments (SBCCOG), has developed a Climate Action Plan (CAP) to reduce GHG emissions and thereby reduce the City's contribution to global climate change concerns. However, the CAP is not a Qualified GHG Emissions Reduction Plan under CEQA per the requirements outlined in the CEQA Guidelines, Section 15183.5(D); therefore, no CEQA document can tier from the City CAP. Therefore, the City of Torrance accepts the Tier 3 quantitative interim GHG emissions significance thresholds recommended by the SCAQMD for commercial, industrial, mixed-use, and industrial development projects. Applicable SCAQMD GHG emissions thresholds are as follows:

- Industrial Projects: 10,000 metric tons of carbon dioxide equivalent per year (MTCO_{2e}/yr.).
- Commercial, Residential, and Mixed-Use Projects (including industrial parks, warehouses, etc.): 3,000 MTCO_{2e}/yr.

For the purposes of this analysis, GHG emissions not exceeding the SCAQMD 3,000 MTCO_{2e}/year screening-level would be less-than-significant.

The site is currently developed with 748,269 sf of office buildings. Estimated GHG emissions from the existing development is summarized at Table 8-1. Estimated Project GHG emissions and net GHG emissions impacts of the Project when compared to existing conditions are summarized at Table 8-2. In this latter regard, GHG emissions that would be generated by the existing uses were appropriately subtracted from the Project GHG emissions to determine net GHG emissions impacts of the Project. As presented at Table 8-2, Project GHG emissions would not exceed applicable SCAQMD thresholds and would therefore be less-than-significant.

**Table 8-1
Existing Conditions GHG Emissions**

Source	Emissions (MT/yr.)			
	CO ₂	CH ₄	N ₂ O	Total CO _{2e}
Area Sources (Landscaping, Site/Building Maintenance, etc.)	0.07	1.80E-04	0.00	0.07
Building Energy Consumption (HVAC Systems)	2,201.83	0.16	0.03	2,213.47
Mobile Sources (Traffic)	6,056.87	0.42	0.27	6,146.28
Waste Management	141.26	8.35	0.00	349.96
Water Use	509.91	4.37	0.11	651.15
Total CO_{2e} (All Sources)	9,360.94			

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

ENVIRONMENTAL ISSUES:

Potentially Significant Impact **Less-Than-Significant Impact With Mitigation** **Less-Than-Significant Impact** **No Impact**

**Table 8-2
Project GHG Emissions**

Emission Source	Emissions (MT/yr.)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Construction emissions (amortized over 30 years)	78.73	0.01	0.00	80.24
Area Sources (Landscaping, Site/Building Maintenance, etc.)	0.07	1.70E-04	0.00	0.07
Building Energy Consumption (HVAC Systems)	2,129.09	0.16	0.02	2,140.35
Mobile Sources (Traffic)	5,289.10	0.29	0.53	5,455.65
On-Site Equipment	152.26	0.05	0.00	153.49
Waste Management	183.75	10.86	0.00	455.23
Water Use	443.38	5.53	0.13	621.62
Project- Total CO₂e (All Sources)	8,906.63			
Existing Conditions Total GHG Emissions	(9,360.94)			
Net Emissions (Project – Existing)	-454.30			

Source: Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment (Urban Crossroads, Inc.) November 8, 2021.

As presented at Table 8-2, the Project would result in net reduction in GHG Emission totaling (454.30) MTCO₂e/yr. Project GHG emissions therefore would not exceed the screening threshold of 3,000 MTCO₂e/yr. GHG emissions not exceeding 3,000 MTCO₂e/yr. screening threshold would not result in a significant impact on the environment. On this basis, the potential for the Project to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment is considered less-than-significant.

- (b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? 3, 10, 17

As summarized below, the Project would be consistent with the City of Torrance Climate Action Plan and by extension would be consistent with and would not conflict with any other applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Climate Action Plan Consistency

The Climate Action Plan identifies GHG emissions sources, presents current and future GHG emissions estimates, identifies a GHG reduction target for future years, and provides strategic policies and actions to reduce GHG emissions from energy, transportation, land use, water use, and waste sectors. The Climate Action Plan is consistent with and implements GHG emissions legislation, GHG emissions reduction strategies, and GHG emissions reduction policies of the State of California. The Climate Action Plan is also consistent with and implements GHG emissions legislation, GHG emissions reduction strategies, and GHG emissions reduction policies implemented by the South Bay Cities Council of Governments (SBCCOG). The Climate Action Plan can be accessed at: <https://www.torranceca.gov/home/showpublisheddocument/56796/637117407753400000>

The Climate Action Plan's existing and projected GHG inventories are based on land use designations and buildout of the City reflected in the City of Torrance General Plan. The Project is consistent with the land use designation and projected buildout conditions presented

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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in the General Plan. Since the Project is consistent with the buildout conditions reflected under the General Plan, the Project by extension would not result in GHG emissions beyond those considered and addressed in the Climate Action Plan.

All development in the City, including the Project, is required to conform to all City-adopted policies including those presented in the Climate Action Plan. The City, through established design and development review processes, would ensure that applicable Climate Action Plan GHG-reducing strategies would be incorporated in the Project.

Based on the preceding, the potential for the Project to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases is considered less-than-significant.

9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- | | | | | | | |
|-----|--|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (a) | Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | 5, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|--|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Project would not result in or cause exposure(s) to hazards or potentially hazardous conditions. That is, uses proposed by the Project are not considered hazardous. Nor does the Project propose or require facilities or operations involving inherent substantial hazards.

During the normal course of construction and operation activities, there would be limited transport of potentially hazardous materials (e.g., gasoline, diesel fuel, paints, solvents, fertilizer, etc.) to and from the Project site. However, the Project would be required to comply with a Project-specific Hazardous Materials Management Plan, and related regulations addressing transport, use, storage and disposal of these materials. The Project does not propose or require uses or activities that would result in atypical transportation, use, storage, or disposal of hazardous or potentially hazardous materials not addressed under current regulations and policies.

Further, any occupancies that would store or use hazardous materials would be required to comply with California Hazardous Materials Business Plan (HMBP) requirements (California Health & Safety Code, Division 20, Chapter 6.95) The HMBP contains detailed information on the storage of hazardous materials at regulated facilities. The purpose of the HMBP is to prevent or minimize damage to public health, safety, and the environment, from a release or threatened release of a hazardous material. The HMBP also provides emergency response personnel with adequate information to help them better prepare and respond to chemical-related incidents at regulated facilities.

The Project does not propose or require uses that would handle hazardous or acutely hazardous materials, substances, or waste. Heavy duty truck traffic accessing the Project would generate diesel particulate matter (DPM). DPM is a known carcinogen. As substantiated in the Project AQIA/GHA/HRA (IS/MND Appendix A) DPM emissions generated by the Project would not result in potentially significant hazardous impacts.

Based on the preceding, the potential for the Project to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials is considered less-than-significant.

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|-----|--|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (b) | Create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | 5, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|--|-------|--------------------------|--------------------------|-------------------------------------|--------------------------|

As substantiated at Checklist item 9(a), the Project would not result in or cause exposure(s) to hazards or potentially hazardous conditions. Nor does the Project propose or require facilities or operations involving inherent substantial hazards. Therefore, no release of hazardous materials into the environment through reasonably foreseeable upset and accident conditions is anticipated. The potential for the Project to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment is therefore considered less-than-significant.

ENVIRONMENTAL ISSUES:		Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	17	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>There are no existing schools, and no schools are proposed, within one-quarter mile of the Project site. The school nearest the Project site is 186th Street Elementary School, which is located 0.4 miles northeasterly of the Project site. Further, the Project does not propose or require uses or activities that would emit hazardous emissions. Nor does the Project propose or require uses or activities that involve handling of hazardous or acutely hazardous materials, hazardous substances, or hazardous waste. Accordingly, the Project would have no potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</i></p>						
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	16, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>The Project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Neither would the Project potentially affect, or be affected by, off-site locations listed pursuant to Government Code Section 65962.5. The Project would therefore have no potential to create or result in a significant hazard to the public or the environment regarding or related to Government Code Section 65962.5.</i></p>						
(e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	7, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>The Project is not subject to provisions of an airport land use plan; and is located approximately 3.5 miles northeasterly of the Torrance Municipal Airport, the nearest public use airport. There are no private airstrips in the vicinity of the Project. There would be no impacts affecting the Project related to noise from public use airports or private airstrips. Neither does the Project propose or require uses that would substantively contribute to public use airport noise or private airstrip airport noise. Further, the Project would not be affected by, or contribute to airport safety concerns. On this basis, the Project would have no potential to result in adverse airport-related hazards impacts or adverse airport-related noise impacts.</i></p>						
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>The Project site does not provide access to or from adjacent properties or commercial buildings, therefore, construction activities would not block access to the public right-of-way from adjacent properties or commercial buildings. The Project does not propose or require designs or activities that would interfere with any identified emergency response or emergency evacuation plan. Temporary alterations to vehicle circulation routes associated with Project construction are addressed through the Project Construction Traffic Management Plan (please refer to IS/MND Section 2.0, Project Description, Subsection 2.4.9, Construction Area Traffic Management Plan). Ongoing coordination with the local fire and police departments during construction would ensure that potential interference with emergency response and evacuation efforts are avoided. The potential for the Project to impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan is therefore considered less-than-significant.</i></p>						

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	1, 15, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Project site and surrounding areas are fully urbanized. No wildlands are located in the vicinity of the Project site. The Project site is not located within Very High Fire Hazard Severity zone. Fire protection services are provided to the City and the Project site by the Torrance Fire Department. Pre-construction coordination with Torrance Fire Department staff and adherence to local fire department regulations during construction and operation of the Project would be required. Based on the preceding, the potential for the Project to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires is considered less-than-significant.

10. HYDROLOGY AND WATER QUALITY. Would the project:

(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Compliance with applicable existing City Stormwater Pollution Prevention Programs (SWPPPs); National Pollution Discharge Elimination System (NPDES) permitting requirements; and mandated Water Quality Management Plan (WQMP) requirements would minimize the potential for the Project to substantively contribute additional polluted runoff during Project construction, or over the operational life of the Project. The Project SWPPP; design, construction, and operation of the Project stormwater management system; and development and implementation of the Project WQMP would conform to applicable City and Regional Water Quality Control Board (RWQCB) requirements.

Under the State Construction General Permit Order (Construction General Permit), “[d]ischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the Construction General Permit for Discharges of Storm Water Associated with Construction Activity” (California State Water Resources Control Board, “Construction Stormwater General Permits”). The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer (QSD). The Project would be required to comply with SWPPP provisions stipulated under the Construction General Permit.

Prior to the issuance of development permits, the Applicant would be required to develop and submit a Final Hydrology Report, Water Quality Management Plan (WQMP), subject to review and approval by the City. Best Management Practices (BMPs) implemented under the approved WQMP would include both structural and non-structural control methods. Structural controls used to manage storm water pollutant levels typically include detention basins, and oil/grit separators. Nonstructural controls focus on controlling pollutants at the source, generally through implementing erosion and sediment control plans.

Design, configuration, and locations of proposed stormwater management system improvements would be reviewed and approved by the City and RWQCB prior to, or concurrent with, application for grading permits. All Project stormwater management system improvements would be constructed by the Project Applicant, or would otherwise be assured (via Project Conditions of Approval or other means established by the Lead Agency) to be in place and operational prior to issuance of the first Certificate of Occupancy for the Project.

The implemented Project stormwater management system; compliance with applicable regulations and water quality standards; compliance with NPDES permitting requirements, compliance with WQMP requirements, and the implemented Project BMPs would minimize the potential for the Project to violate any water quality standards or waste discharge requirements. Impacts in this regard are therefore considered less-than-significant.

ENVIRONMENTAL ISSUES:		Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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| (b) | Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | 2, 7, 8, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|--|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Project will be required to implement low impact development techniques that provide sufficient groundwater infiltration, and low water use fixtures and landscape palettes to minimize water demand while promoting infiltration of surface runoff. The Project would not contribute to groundwater depletion, nor discernibly interfere with groundwater recharge. The Project would connect to the City water system. Water is provided throughout the City by Torrance Municipal Water (TMW).

The Project uses are consistent with the range and types of site development anticipated under the City of Torrance General Plan. Water demands under General Plan Buildout Conditions are reflected in the City of Torrance 2015 Urban Water Management Plan (2015 UWMP). By extension, the Project water demands are accounted for in the 2015 UWMP. Groundwater which may be consumed by the Project and the City as a whole is recharged pursuant to TMW policies and programs articulated in the 2015 UWMP. There are no designated groundwater recharge areas within the Project site. The Project would not otherwise affect designated recharge areas.

Direct additions or withdrawals of groundwater are not proposed by or required by the Project. Further, construction proposed by the Project will not involve substructures or other intrusions at depths that would significantly impair or alter the direction or rate of flow of groundwater. Additionally, as substantiated herein, the Project would not result in adverse impacts to water supplies including groundwater supplies. See also: Discussion at IS/MND Checklist Item 19. Utilities and Service Systems. Based on the preceding, the potential for the Project to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin is less-than-significant.

- (c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

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|----|---|----------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| i) | Result in substantial erosion or siltation on- or off-site; | 7, 8, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|----------|--------------------------|--------------------------|-------------------------------------|--------------------------|

Existing site drainage patterns would be maintained under the developed Project. The Project does not propose or require alteration of the course(s) of any streams or rivers. Potential erosion impacts incurred during construction activities are mitigated below the level of significance through the Project's mandated compliance with a City-approved SWPPP and compliance with SCAQMD [fugitive dust] Rules that prohibit grading activities and site disturbance during high wind events.

Additionally, a Grading and Drainage Plan must be approved by the Building Official and City Engineer prior to issuance of grading permits. The Project would construct all necessary storm drain improvements and storm drain connections consistent with City requirements. All Project stormwater management systems and improvements would be development-specific and localized to the Project area.

The rate and amount of surface water runoff from the developed Project site would be controlled via the Project stormwater management system and Project WQMP so as to preclude substantial erosion, siltation, flooding, exceedance of stormwater drainage system capacities, or contribution of substantial additional pollutants. All Project stormwater management system improvements and the Project WQMP are subject to review and approval by the City.

The Project site is not located within a designated flood zone and is not subject to substantial flood flows. The Project does not propose uses or facilities that would otherwise impede or redirect flood flows.

Based on the preceding, the Project's potential to: substantially alter the existing drainage pattern of the site or area in a manner which would result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows is less-than-significant.

ENVIRONMENTAL ISSUES:		Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
ii)	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; <i>See discussion at Checklist item 10 (c) i.</i>	7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or <i>See discussion at Checklist item 10 (c) i.</i>	7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv)	Impede or redirect flood flows? <i>See discussion at Checklist item 10 (c) i.</i>	7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? <i>The Project site is located approximately 4 miles inland and is not subject to tsunami hazards. The Project site is not located in a dam inundation area or near a body of water that would be subject seiche events.</i> <i>Additionally, the Project uses would be required to develop and implement Hazardous Materials Release Response Plans and Inventory (Business Plans). These Business Plans specifically address storage and use of hazardous materials so as to minimize their potential release and containment under emergency conditions, such as flooding. The Business Plans also incorporate measures to reduce potential effects of hazardous materials and related pollutants if released.</i> <i>Based on the preceding, the potential for release of pollutants due to Project inundation under a flood, tsunami, or seiche event is considered less-than-significant.</i>	7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? <i>The Project would implement water quality control measures consistent with City and RWQCB requirements. The Project would therefore not result in potentially adverse water quality impacts and would not conflict with or obstruct implementation of a water quality control plan, in this instance, the Water Quality Control Plan for the Los Angeles Region. The Project does not propose or require direct withdrawal of groundwater. Neither would the Project adversely affect designated groundwater recharge areas or groundwater recharge facilities. The Project does not propose uses or activities that would conflict with a sustainable groundwater management plan. The Project would implement Low Impact Development (LID) measures facilitating infiltration of treated stormwaters to the groundwater table. Based on the preceding, the potential for the Project to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan is less-than-significant.</i>	7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

11. LAND USE AND PLANNING. Would the project:

(a)	Physically divide an established community?	5, 6, 7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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No established community is located within the Project site. The Project would not otherwise result in potential division of an established community. The Project site is located in a largely urbanized area bordered by development on all sides. Industrial and commercial uses exist to the north across 190th Street. Industrial uses exist to the east across Western Avenue, to the west across Gramercy Place, and to the south along 195th Street. The Project involves demolition of existing business park buildings, and construction of a new light industrial buildings and parking areas. The Project buildings measure 53' in height, similar to other light industrial building heights in the vicinity. Access to and around the Project site would be enhanced by providing pedestrian pathways to the sidewalks and driveways along Western Avenue, 190th Street, Gramercy Place, and 195th Street. The Project would therefore not result in division of an established community. Nor would the Project otherwise result in or require uses or activities that would physically divide an established community. The Project would have no impacts in these regards.

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|---|----------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | 5, 6, 7, 8, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|----------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

Land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects are established under the City of Torrance General Plan. The light industrial uses proposed by the Project are allowed under the site's existing Business Park Land Use designation. The Project does not propose or require amendment of the site's Business Park Land Use designation.

Zoning of the Project site is Heavy Manufacturing (M2). The Light Industrial uses proposed by the Project are permitted, or are conditionally permitted in the Heavy Manufacturing Zoning district. 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. On this basis, the potential for the Project to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect is considered less-than-significant.

12. MINERAL RESOURCES. Would the project:

- | | | | | | |
|---|------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | 7, 8 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|------|--------------------------|--------------------------|--------------------------|-------------------------------------|

Per the Community Resources Element of the City of Torrance General Plan, the Project site is located within Mineral Resources Zone (MRZ) "MRZ-1", which is the classification for areas where "no significant mineral deposits are present or likely to be present" (General Plan Figure CR-5, Mineral Resource Zones). The Project site is not designated as a State Aggregate Resources Area or as a valuable mineral resource recovery site. There are no known mineral resources in the vicinity; Nor does the Project propose or require uses or activities that would affect off-site mineral resources. The Project would have no impact on the availability of known mineral resources.

- | | | | | | |
|--|------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | 7, 8 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|------|--------------------------|--------------------------|--------------------------|-------------------------------------|

Please refer to response at Checklist Item 12a.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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13. NOISE. Would the project result in:

- (a) Generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? 5, 7, 8, 17

Overview

The Project proposes conventional light industrial development within an urban context. Project construction activities would generate temporary and intermittent noise. Project operations, including on-site area sources and off-site vehicular sources, would also contribute to area noise levels. Analysis of the Project’s potential noise impacts is summarized below, and is presented in detail in Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021 (Project Noise Impact Analysis, IS/MND Appendix C).

Ambient Conditions

Ambient noise conditions in the Study Area were established by noise measurements conducted at locations representative of noise levels at potentially affected noise receptor land uses. Noise measurement locations are presented at Figure 3-6. Ambient noise conditions are summarized at Table 13-1.

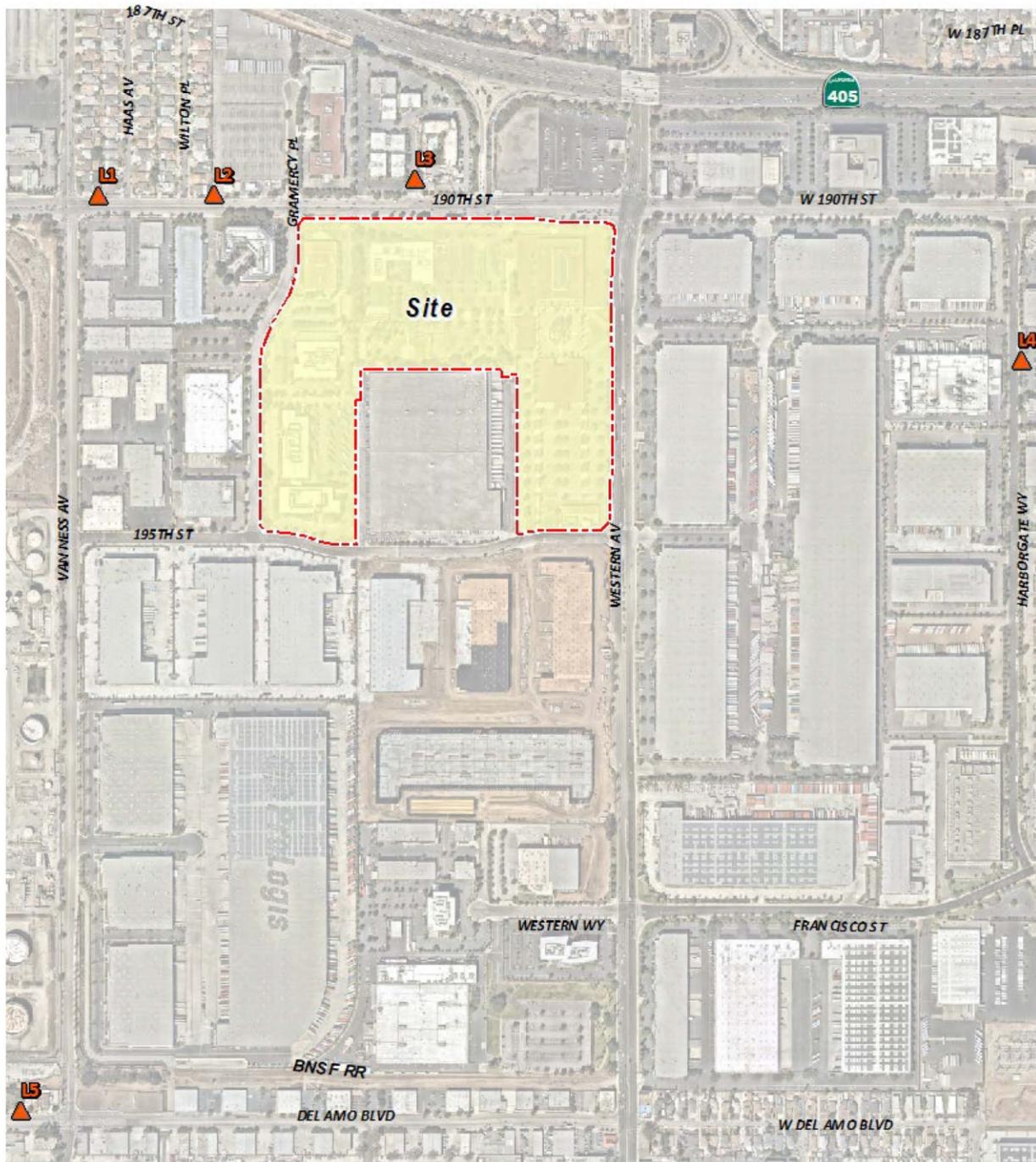
**Table 13-1
Ambient Noise Conditions**

Location	Description	Energy Average Noise Level (dBA Leq)	
		Daytime	Nighttime
L1	Located northwest of the Project site near single-family residence at 18931 Haas Avenue.	76.3	71.6
L2	Located northwest of the Project site near single-family residence at 18932 Wilton Place.	74.5	70.6
L3	Located north of the Project site near Sonesta Select Los Angeles Torrance at 1925 West 190th Street.	64.4	60.6
L4	Located east of the Project site near Extended Stay America - Los Angeles Torrance Harbor at 19200 Harborgate Way.	66.0	57.9
L5	Located southwest of the Project site near single-family residence at 2063 Del Amo Boulevard.	66.7	61.5

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

Study Area Noise Receptors

Locations of proximate noise receptors that could be affected by Project construction-source and operational-source noise are presented at Figure 3-7. These noise receptors are described below.

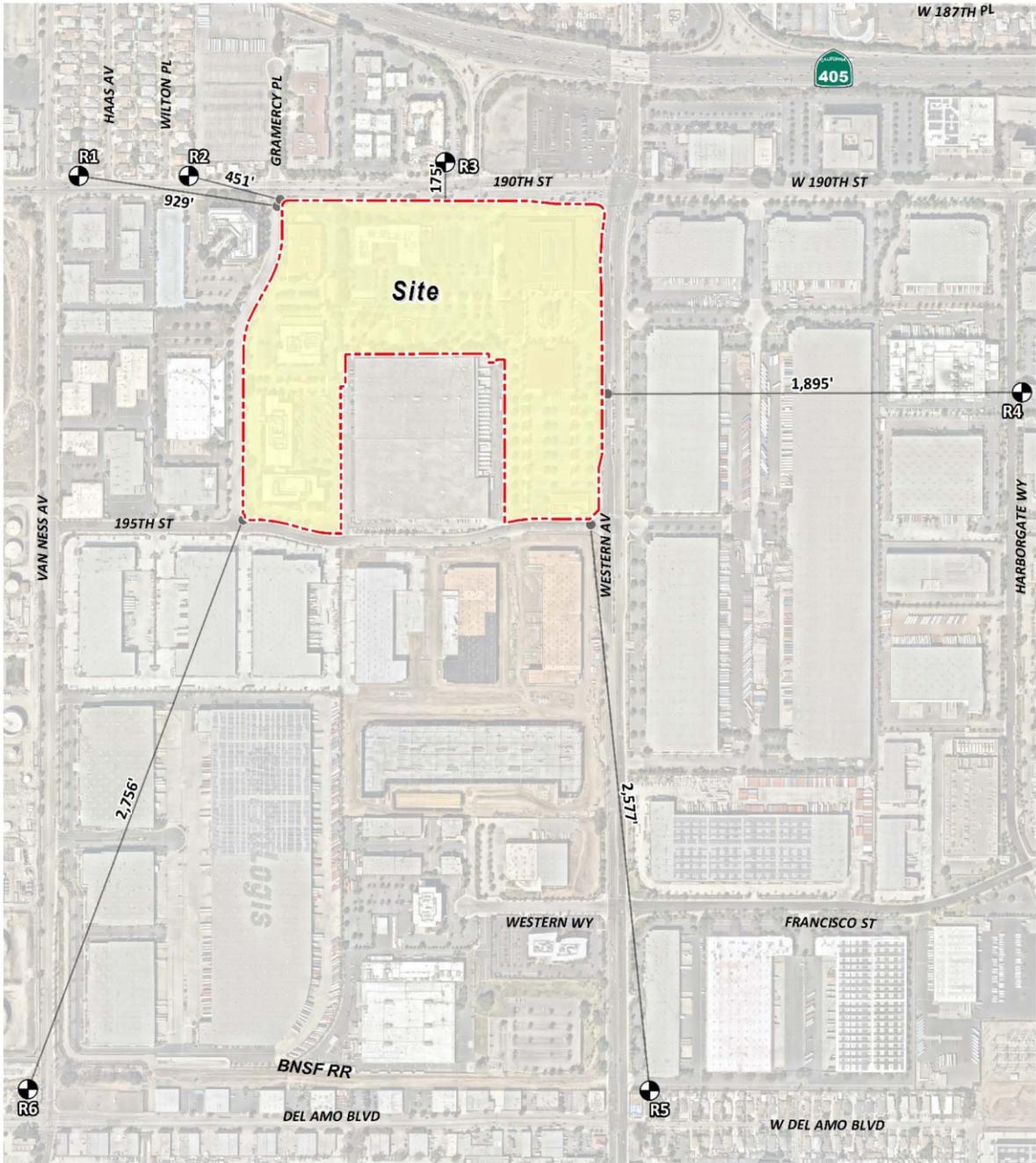


LEGEND:
 Measurement Locations



NOT TO SCALE
 Source: Urban Crossroads, Inc.; Applied Planning, Inc.

Figure 3-6
 Noise Measurement Locations



LEGEND:
 N ● Receiver Locations —● Distance from receiver to Project site boundary (in feet)



NOT TO SCALE
 Source: Urban Crossroads, Inc.; Applied Planning, Inc.

Figure 3-7
 Receiver Locations

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Receptor R1: Location R1 represents the residential use at 18931 Haas Avenue, approximately 929 feet northwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R1 is placed at the building façade. A 24-hour noise measurement (Measurement Location L1) was taken near this location to describe the existing ambient noise environment.

Receptor R2: Location R2 represents the residential use at 18932 Wilton Place, approximately 451 feet northwest of the Project site. Receiver R2 is placed in the outdoor living area (private backyard) facing the Project site. A 24-hour noise measurement (Measurement Location L2) was taken near this location to describe the existing ambient noise environment.

Receptor R3: Location R3 represents the Sonesta Select Los Angeles Torrance Hotel at 1925 West 190th Street, approximately 175 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R3 is placed at the building façade. A 24-hour noise measurement (Measurement Location L3) was taken near this location to describe the existing ambient noise environment.

Receptor R4: Location R4 represents the Extended Stay America - Los Angeles Torrance Harbor Hotel at 19200 Harbortate Way, approximately 1,895 feet east of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R4 is placed at the building façade. A 24-hour noise measurement (Measurement Location L4) was taken near this location to describe the existing ambient noise environment.

Receptor R5: Location R5 represents the residential use at 1663 Del Amo Boulevard, approximately 2,577 feet southeast of the Project site. Receiver R5 is placed at the private outdoor living areas (backyards) facing the Project site. A 24-hour noise measurement was taken (Measurement Location L5) to describe the existing ambient noise environment.

Receptor R6: Location R6 represents the residential use at 2057 Del Amo Boulevard, approximately 2,756 feet southwest of the Project site. Receiver R6 is placed in the outdoor living area (private backyard) facing the Project site. A 24-hour noise measurement (Measurement Location L5) was taken near this location to describe the existing ambient noise environment.

Significance Criteria

The following criteria were utilized in assessing the significance of Project noise/vibration impacts. These criteria reflect and are based on City of Torrance General Plan Noise Element Policies, City of Torrance Municipal Code Noise Regulations, California Department of Transportation (Caltrans) Noise and Vibration Guidance, Federal Interagency Committee on Noise (FICON) Guidance, and Federal Transit Administration Transit Noise and Vibration Impact Assessment Guidance.

ENVIRONMENTAL ISSUES:

Potentially Significant Impact **Less-Than-Significant Impact With Mitigation** **Less-Than-Significant Impact** **No Impact**

**Table 13-2
Noise/Vibration Impact Significance Criteria**

Analysis Scenario	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic	Noise-Sensitive	if ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		if ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		if ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
	Non-Noise-Sensitive	if ambient is > 70 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	Noise-Sensitive	See Table 3-1	55 dBA Leq	50 dBA Leq
		if ambient is < 60 dBA Leq	≥ 5 dBA Leq Project increase	
		if ambient is 60 - 65 dBA Leq	≥ 3 dBA Leq Project increase	
		if ambient is > 65 dBA Leq	≥ 1.5 dBA Leq Project increase	
Construction	Noise-Sensitive	Permitted hours of 7:30 a.m. to 6:00 p.m. on weekdays, 9:00 a.m. to 5:00 p.m. on Saturdays with no activity on Sundays and federal holidays		
		Noise Level Threshold	80 dBA Leq	50 dBA Leq
		Building Damage Vibration Threshold	0.5 PPV (in/sec)	
		Human Annoyance Vibration Threshold	0.04 PPV (in/sec)	

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

Construction-Source Noise Impacts

Construction-source noise would be generated during site preparation, grading, building construction, paving, and architectural coating. Typical construction equipment used at the site would include tractors, dozers, trucks, excavators, compactors, cranes, welders, pavers, paving equipment, rollers, and air compressors. Representative noise levels that would be generated during Project construction activities are presented at Table 13-3.

ENVIRONMENTAL ISSUES:

Sources **Potentially Significant Impact** **Less-Than-Significant Impact With Mitigation** **Less-Than-Significant Impact** **No Impact**

**Table 13-3
Construction Activity Reference Noise Levels**

Activity	Equipment Utilized	Reference Noise Level @ 50 Feet (dBA Leq)	Combined Noise Level (dBA Leq)
Demolition	Demolition Equipment	82	83
	Backhoes	74	
	Hauling Trucks	72	
Site Preparation	Crawler Tractors	78	80
	Hauling Trucks	72	
	Rubber Tired Dozers	75	
Grading	Graders	81	83
	Excavators	77	
	Compactors	76	
Building Construction	Cranes	73	81
	Tractors	80	
	Welders	70	
Paving	Pavers	74	83
	Paving Equipment	82	
	Rollers	73	
Architectural Coating	Cranes	73	77
	Air Compressors	74	
	Generator Sets	70	

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

Maximum noise levels that would be generated by Project construction activities as received at Study Area receptor locations are summarized at Table 13-4.

ENVIRONMENTAL ISSUES:

Sources Potentially Significant Impact Less-Than-Significant Impact With Mitigation Less-Than-Significant Impact No Impact

**Table 13-4
Maximum Received Construction-Source Noise Levels**

Receiver Location	Construction Activity and Noise Levels (dBA L _{eq})						Combined Received Noise Levels (dBA L _{eq})
	Demolition	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	
R1	48.9	45.9	48.9	46.9	48.9	42.9	48.9
R2	52.0	49.0	52.0	50.0	52.0	46.0	52.0
R3	55.9	52.9	55.9	53.9	55.9	49.9	55.9
R4	44.5	41.5	44.5	42.5	44.5	38.5	44.5
R5	41.4	38.4	41.4	39.4	41.4	35.4	41.4
R6	40.6	37.6	40.6	38.6	40.6	34.6	40.6

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

Maximum construction-source noise levels received at the Study Area receptor locations compared to applicable thresholds is summarized at Table 13-3. As indicated at Table 13-5, maximum received construction-source noise would not exceed applicable thresholds, and would therefore be less-than-significant.

**Table 13-5
Maximum Received Construction-Source Noise Levels**

Receiver Location	Construction Noise Levels (dBA L _{eq})		
	Maximum Received Noise Level	Threshold	Threshold Exceeded?
R1	48.9	80	No
R2	52.0	80	No
R3	55.9	80	No
R4	44.5	80	No
R5	41.4	80	No
R6	40.6	80	No

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

ENVIRONMENTAL ISSUES:

Sources

Potentially Significant Impact

Less-Than-Significant Impact With Mitigation

Less-Than-Significant Impact

No Impact

Operational-Source Noise

Stationary/Area Sources

Project stationary/area noise sources would include: Loading dock activities, truck movements, general parking lot activities and vehicle movements, roof-top air conditioning units, and trash enclosure activities.

Representative noise levels that would be generated by Project operational stationary/area sources are presented at Table 13-6.

**Table 13-6
Operational Stationary/Area Source Noise Reference Levels**

Noise Source	Reference Noise Level (dBA L _{eq} @ 50 Feet)
Loading Dock Activities	62.8
Roof-Top Air Conditioning Units	57.2
Trash Enclosure Activity	57.3
Parking Lot Vehicle Movements	56.1
Truck Movements	58.0

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

Maximum daytime/nighttime operational stationary/area-source noise levels received at Study Area receiver locations are presented at Tables 13-7, 13-8 respectively.

**Table 13-7
Daytime
Maximum Received Operational Stationary/Area-Source Noise Levels**

Noise Source	Noise Levels by Receiver Location (dBA Leq)					
	R1	R2	R3	R4	R5	R6
Loading Dock Activity	30.8	30.6	47.0	28.2	34.1	32.2
Roof-Top Air Conditioning Units	27.7	29.7	32.8	23.0	20.6	19.8
Trash Enclosure Activity	12.6	11.8	29.6	12.3	15.5	13.6
Parking Lot Vehicle Movements	35.2	38.4	39.9	31.5	26.8	25.8
Truck Movements	35.1	37.7	45.4	31.1	29.8	27.8
Total (All Noise Sources)	39.2	41.7	49.9	35.5	36.2	34.4

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

ENVIRONMENTAL ISSUES:

Sources **Potentially Significant Impact** **Less-Than-Significant Impact With Mitigation** **Less-Than-Significant Impact** **No Impact**

**Table 13-8
Nighttime
Maximum Received Operational Stationary/Area-Source Noise Levels**

Noise Source	Noise Levels by Receiver Location (dBA Leq)					
	R1	R2	R3	R4	R5	R6
Loading Dock Activity	30.8	30.6	47.0	28.2	34.1	32.2
Roof-Top Air Conditioning Units	25.3	27.3	30.4	20.6	18.2	17.4
Trash Enclosure Activity	11.6	10.8	28.6	11.3	14.5	12.6
Parking Lot Vehicle Movements	34.3	37.4	38.9	30.5	25.8	24.8
Truck Movements	34.1	36.7	44.4	30.2	28.9	26.9
Total (All Noise Sources)	38.3	40.7	49.4	34.7	35.8	34.0

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

Maximum operational stationary/area-source noise levels at Study Area receiver locations are compared to applicable thresholds at Table 13-9. As indicated at Table 13-9, maximum received construction-source noise levels would not exceed applicable thresholds, and would therefore be less-than-significant.

**Table 13-9
Maximum Received Stationary/Area-Source Noise Levels**

Receiver Location	Project Operational Noise Levels (dBA Leq)		Noise Level Standards (dBA Leq)		Noise Level Standards Exceeded?	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	39.2	38.3	55	50	No	No
R2	41.7	40.7	55	50	No	No
R3	49.9	49.4	55	50	No	No
R4	35.5	34.7	55	50	No	No
R5	36.2	35.8	55	50	No	No
R6	34.4	34.0	55	50	No	No

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

The Project Noise Impact Analysis also considered Project stationary/area-source incremental noise contributions to ambient conditions. As summarized at Tables 13-10, 13-11 As indicated at Tables 13-10, 13-11 Project stationary/area-source noise contributions to ambient conditions would not exceed applicable thresholds and would therefore be less-than-significant.

ENVIRONMENTAL ISSUES:

Potentially Significant Impact **Less-Than-Significant Impact With Mitigation** **Less-Than-Significant Impact** **No Impact**

**Table 13-10
Project Stationary/Area-Source Noise Contributions To Daytime Conditions**

Receiver Location	Total Project Operational Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient	Project Increase	Increase Criteria	Increase Criteria Exceeded?
R1	39.2	L1	76.3	76.3	0.0	1.5	No
R2	41.7	L2	74.5	74.5	0.0	1.5	No
R3	49.9	L3	64.4	64.6	0.2	5.0	No
R4	35.5	L4	66.0	66.0	0.0	1.5	No
R5	36.2	L5	66.7	66.7	0.0	1.5	No
R6	34.4	L5	66.7	66.7	0.0	1.5	No

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

**Table 13-11
Project Stationary/Area-Source Noise Contributions to Nighttime Conditions**

Receiver Location	Total Project Operational Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient ⁵	Project Increase	Increase Criteria	Increase Criteria Exceeded?
R1	38.3	L1	71.6	71.6	0.0	1.5	No
R2	40.7	L2	70.6	70.6	0.0	1.5	No
R3	49.4	L3	60.6	60.9	0.3	5.0	No
R4	34.7	L4	57.9	57.9	0.0	5.0	No
R5	35.8	L5	61.5	61.5	0.0	5.0	No
R6	34.0	L5	61.5	61.5	0.0	5.0	No

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

Vehicular-Source Noise

Project traffic vehicular-source noise impacts were assessed by determining the Project's incremental contribution to ambient roadway noise levels. Vehicular-source noise contributions were derived from Project traffic volumes as detailed in the Project TIA (IS/MND Appendix D) Maximum vehicular-source noise levels at Study Area land uses are summarized at Table 13-7 and compared to applicable thresholds. As indicated at Table 13-12, Project vehicular-source noise levels received at Study Area land uses would not exceed applicable thresholds and would therefore be less-than-significant.

ENVIRONMENTAL ISSUES:

Sources Potentially Significant Impact Less-Than-Significant Impact With Mitigation Less-Than-Significant Impact No Impact

**Table 13-12
Project Vehicular-Source Noise Impacts**

Roadway	Segment	Receiving Land Use Noise Sensitivity	Noise Level at Receiving Land Use (dBA CNEL)			Incremental Noise Level Increase Threshold (dBA CNEL)	Threshold Exceeded?
			Without Project	With Project	Project Addition		
Van Ness Av.	n/o 190th St.	Sensitive	65.5	66.1	0.6	1.5	No
Van Ness Av.	s/o 190th St.	Non-Sensitive	65.3	65.8	0.5	n/a	No
Van Ness Av.	s/o 195th St.	Sensitive	65.3	66.0	0.7	1.5	No
Van Ness Av.	s/o Del Amo Blvd.	Non-Sensitive	64.6	65.0	0.4	n/a	No
Western Av.	n/o I-405 NB Ramp	Non-Sensitive	67.4	67.7	0.3	n/a	No
Western Av.	n/o 190th St.	Non-Sensitive	68.6	69.4	0.8	n/a	No
Western Av.	s/o 190th St.	Non-Sensitive	68.5	69.2	0.7	n/a	No
Western Av.	s/o 195th St.	Non-Sensitive	68.6	68.9	0.3	n/a	No
Western Av.	n/o Del Amo Blvd.	Sensitive	68.8	69.1	0.3	1.5	No
Western Av.	s/o Del Amo Blvd.	Sensitive	67.9	68.3	0.4	1.5	No
190th St.	w/o Van Ness Av.	Non-Sensitive	69.4	69.8	0.4	n/a	No
190th St.	e/o Van Ness Av.	Sensitive	69.2	69.7	0.5	1.5	No
190th St.	w/o Western Av.	Non-Sensitive	69.1	69.5	0.4	n/a	No
195th St.	w/o Gramercy Pl.	Non-Sensitive	51.4	60.5	9.1	n/a	No
Del Amo Blvd.	w/o Van Ness Av.	Sensitive	64.5	64.8	0.3	3.0	No

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

- (b) Generation of excessive groundborne vibration or groundborne noise levels? 5, 17

The Project does not propose or require uses or activities that would result in perceptible operational-source vibration at off-site land uses. However, heavy equipment operations during construction of the Project uses could result in perceptible vibration at off-site land uses. Representative vibration levels that would be generated by Project construction equipment are presented at Table 13-13.

**Table 13-13
Construction Equipment Vibration Reference Levels**

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Maximum vibration levels at Study Area receiver locations are summarized at Table 13-14 and compared to applicable thresholds. As indicated at Table 13-8, maximum received Project construction-source vibration levels would not exceed applicable thresholds and would therefore be less-than-significant.

**Table 13-14
Maximum Received Construction-Source Vibration Levels**

Receiver	Distance to Const. Activity (Feet)	Typical Construction Vibration Levels Peak Particle Velocity (PPV) (in/sec)					Threshold PPV (in/sec)	Thresholds Exceeded?
		Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Highest Vibration Level		
R1	929'	0.000	0.000	0.000	0.000	0.000	0.3	No
R2	451'	0.000	0.000	0.001	0.001	0.001	0.3	No
R3	175'	0.000	0.002	0.004	0.005	0.005	0.3	No
R4	1,895'	0.000	0.000	0.000	0.000	0.000	0.3	No
R5	2,577'	0.000	0.000	0.000	0.000	0.000	0.3	No
R6	2,756'	0.000	0.000	0.000	0.000	0.000	0.3	No

Source: Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance (Urban Crossroads) December 20, 2021.

- (c) For a project located within the vicinity of a private air strip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? 6, 17

The Project is not subject to provisions of an airport land use plan. The Project is located approximately 4.0 miles northeasterly of the Torrance Municipal Airport, the nearest public use airport. While occasional aircraft overflight may occur, substantive aircraft-related noise would not affect the Project area. Moreover, the Project does not propose activities or uses that would cause or otherwise affect airport-related noise impacts. Based on the preceding, there is no potential for the Project to expose people residing or working in the Project area to excessive noise levels related to airports or airport activities.

14. POPULATION AND HOUSING. Would the project:

- (a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? 7, 8, 17

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Direct Population Growth Inducement

The Project does not propose residential uses and would not contribute measurably to direct population growth.

Indirect Growth Inducement

Project development could result in indirect population growth through creation of additional jobs. In general terms, job creation furthers growth via wages, salaries and general fiscal benefits; increased demands for housing; and increased demand for consumer goods and services. Jobs created by or resulting from the Project would be typical of area employment opportunities, and would be filled by the local residents with no substantial increase in population. The Project does not propose or require extension of roads or other infrastructure that would induce substantial unplanned growth.

Consistency with Population Growth Projections

SCAG population growth projections reflect assumptions and development scenarios incorporated in local plans including City general plans. The Project is consistent with development anticipated under the General Plan and would not induce or generate growth beyond that reflected in the General Plan. Accordingly, the Project would not result in growth not already anticipated within SCAG population growth projections for the region.

As supported by the preceding discussions, the Project would not directly or indirectly induce substantial unplanned population growth. Impacts in these regards is considered less-than-significant.

(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No housing exists within the Project site. The Project site is not designated for residential development. The Project does not propose or require uses or facilities that would result in displacement of persons or requirements for replacement housing. The Project would have no potential to displace substantial numbers of existing people or housing or necessitate the construction of replacement housing elsewhere.

15. PUBLIC SERVICES

(a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(i)	Fire protection?	6, 7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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Fire suppression and emergency response services are provided by the Torrance Fire Department (Fire Department). The Project would incrementally contribute to area-wide demands for fire suppression and emergency response services. However, the Project comprises infill urban redevelopment that is consistent with General Plan and Zoning of the site, within an area already served by fire protection/emergency response services. The Project would therefore not substantially contribute to additional demands for fire protection services.

The Project's incremental demands for fire protection services are diminished through compliance with City and Fire Department fire prevention/fire suppression design and construction requirements. To these ends, the Project is required to comply with agency-specific criteria outlined in the Project Conditions of Approval. The Project would comply with these Conditions of Approval and subsequent Fire Department requirements that may be identified through the City's final site plan and plan check/building permit review processes. Compliance with these requirements reduces potential demands for, and impacts on, fire protection and emergency response services.

Additionally, the Project would be required to comply with all applicable federal, state, and local regulations governing fire resistant designs, fire suppression systems, adequate fire access, fire flows, and number and locations of hydrants. In combination, these preventive design measures act to reduce demands for fire protection services and reduce adverse effects of fires.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the provision of the new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts is considered less-than-significant.

(ii)	Police protection?	6, 7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Police protection services for the Project area are provided by the Torrance Police Department (Police Department). The Project would incrementally contribute to area-wide demands for police protection services. However, the Project comprises infill urban redevelopment that is consistent with General Plan and Zoning of the site, within an area already served by police protection services. The Project would therefore not substantially contribute to additional demands for police protection services.

The Project's incremental demands for police protection services are diminished through compliance with City and Police Department site and building safety/security design and construction requirements. To these ends, the Project is required to comply with agency-specific criteria outlined in the Project Conditions of Approval. The Project would comply with these Conditions of Approval and subsequent Police Department requirements that may be identified through the City's final site plan and plan check/building permit review processes. Compliance with these requirements reduces potential demands for, and impacts on, police protection services.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the provision of the new or physically altered police protection facilities, the construction of which could cause significant environmental impacts is considered less-than-significant.

(iii)	Schools?	6, 7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Project comprises infill urban redevelopment that is consistent with General Plan and Zoning of the site, within an area already served by school services. Development of the Project light industrial uses would not substantively affect the City resident population, and would not demonstrably affect demands for population-driven demands for school services. Mandated school impact fees would be paid acting to offset Project-source incremental demands on school services. On this basis, the potential for the Project to result in substantial adverse physical impacts associated with the provision of the new or physically altered school facilities is considered less-than-significant.

(iv)	Parks?	6, 7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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The Project comprises infill urban redevelopment that is consistent with General Plan and Zoning of the site, within an area already served by parks. Development of the Project light industrial and uses would not substantively affect the City resident population, and would not demonstrably affect population-driven demands for park services or parks facilities. On this basis, the potential for the Project to result in substantial adverse physical impacts associated with the provision of the new or physically altered park facilities is considered less-than-significant.

- | | | | | | | |
|-----|--------------------------|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (v) | Other public facilities? | 6, 7, 8, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|--------------------------|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

Development of the Project would require established public agency oversight including, but not limited to, various plan check and permitting actions by the City. Impacts of the Project would fall within routine tasks of these agencies/departments and are paid for via plan check and inspection fees. Impacts of the Project would not be of such magnitude that new or physically altered facilities would be required.

Demands for other public services generally are offset by purveyor connection and service fees and payment of City Development Impact Fees (DIF). Since November of 2005, the City of Torrance has collected a Development Impact Fee (DIF). The DIF is a one-time cost other than a tax or special assessment fee that is charged by a local government agency. The DIF is applied to pay a portion of the costs identified for public facilities used for transportation services, undergrounding of utilities, sewer and storm drain, Police and Fire facilities, parks and libraries. In no instance would service demands of the Project require the construction of new facilities that would result in potentially significant environmental impacts.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with new or physically "other" public facilities is therefore considered less-than-significant.

16. RECREATION:

- | | | | | | | |
|-----|---|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (a) | Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | 6, 7, 8, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|---|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Project comprises infill urban redevelopment that is consistent with General Plan and Zoning of the site, within an area already served by parks and recreational facilities. Development of the Project light industrial uses would not substantively affect the City resident population, and would not demonstrably affect population-driven use of neighborhood and regional parks or other recreational facilities.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the increased use of existing neighborhood and regional parks or other parks and recreational facilities is considered less-than-significant.

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|-----|--|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (b) | Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | 6, 7, 8, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|--|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Project comprises infill urban redevelopment that is consistent with General Plan and Zoning of the site, within an area already served by recreational facilities. The Project does not propose or require recreational facilities. Development of the Project light industrial and commercial-service uses would not substantively affect the City resident population, and would not demonstrably affect population-driven demands for recreational facilities.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the construction or expansion of recreational facilities is considered less-than-significant.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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17. TRANSPORTATION. Would the project:

(a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	5, 7, 8, 11, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Project does not propose or require uses or facilities that would potentially conflict with a program plan, ordinance or policy addressing the circulation system.

Transit services are provided to the City by Torrance Transit. Torrance Transit Line 5 currently provides bus service along Van Ness Avenue (N – S) approximately 0.2 miles easterly of the Project site. Torrance Transit Line 6 currently provides bus service along 190th Street (E – W), the Project site northerly boundary. On a long-term basis, the Project may result in increased demand for public transportation as increased employment opportunities become available onsite. Transit agencies routinely review and adjust their ridership schedules to accommodate shifts in demand for services. As part of the City’s standard development review processes, the need for transit-related facilities, bicycle, and pedestrian access would be coordinated between the City, Torrance Transit, and the Applicant.

Development of the City pursuant to the General Plan is reflected in Southern California Association of Governments (SCAG) planning efforts and policies including: The 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 – 2045 SCAG RTP/SCS). The Project is consistent with the General Plan and by extension is reflected in SCAG planning efforts and policies.

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 (City TIA Guidelines) 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.

Consistent with City requirements, the Project would pay Development Impact Fees (DIF) providing for improvement of the area circulation system, acting to offset incremental effects of Project traffic.

Based on the preceding, the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities is considered less-than-significant.

(b)	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	13, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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CEQA Guidelines §15064.3, subdivision (b) specifies Vehicle Miles Traveled (VMT) as the metric to be employed by lead agencies in the evaluation of transportation impacts. The Project land uses and development intensities are consistent with the buildout of the City per the City General Plan. The City General Plan is consistent with and is reflected in the 2020 – 2045 SCAG RTP/SCS. By extension, the Project is consistent with the 2020 – 2045 SCAG RTP/SCS. Per the City TIA Guidelines, VMT screening criteria, a Project that is consistent with the 2020 – 2045 SCAG RTP/SCS and that generates fewer than 110 net new average daily trips (ADT) are generally expected to cause a less-than-significant VMT impact.

The Project would implement uses that would incrementally reduce ADT when compared to uses currently occupying the Project site. Net ADT resulting from the Project is summarized at Table 17-1. See also: SRG Torrance Commerce Center Phase III VMT Screening Analysis, City of Torrance, California (RK Engineering Group, Inc.) July 15, 2021, IS/MND Appendix D.

**Table 17-1
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 Uses	-589	-96	-685	-109	-570	-679	-5,749
Net Difference	-294	-27	-321	-33	-282	-315	-2,686

Source: SRG Torrance Commerce Center Phase III VMT Screening Analysis, City of Torrance, California (RK Engineering Group, Inc.) July 15, 2021.

As summarized at Table 17-1, the Project would result in a net reduction of approximately 2,686 ADT. Project net ADT (- 2,686) would not exceed the 110 net new ADT City VMT analysis screening threshold. On this basis, Project VMT impacts are considered less-than-significant, as is the potential for the Project to conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

- (c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? 11, 17

The Project does not propose elements or aspects that would substantially increase transportation/traffic hazards. Moreover, any improvements under the Project would be designed and implemented consistent with City traffic engineering and safety standards, thereby minimizing the potential to result in or cause hazardous traffic/transportation conditions.

The Project would generate urban traffic comparable to and compatible with the vehicle mix and vehicle categories present within the area roadway system. The Project uses would therefore not cause or result in incompatible vehicle movements or traffic that would substantively increase hazards.

Additionally, pursuant to the Project Construction Area Traffic Management Plan (please refer to IS/MND Section 2, Project Description, Subsection 2.4.9, Construction Area Traffic Management Plan), the Project would be required to maintain appropriate access during construction activities.

Based on the preceding, the potential for the Project to substantially increase hazards due to a geometric design feature or incompatible uses is considered less-than-significant.

- (d) Result in inadequate emergency access? 7, 8, 17

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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The Project does not propose or require elements or aspects that would intrinsically increase transportation/traffic hazards or restrict emergency access. In conjunction with the approval of building permits, the City would review all Project designs and plans to assure compliance with applicable emergency access and safety requirements and thereby preclude or resolve any potential emergency access concerns. The potential for the Project to substantially increase hazards due to a design feature or result in inadequate emergency access is therefore less-than-significant. Please refer also to related discussions at Checklist Item 9. Hazards and Hazardous Materials, f) [potential to] Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

18. TRIBAL CULTURAL RESOURCES. Would the project:

(a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	9, 17	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	9, 17	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Within the Project site, there are no known Tribal Cultural Resources or other resources that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined at Public Resources Code section 5020.1(k). Nor does the Project propose or require uses or activities that would adversely affect off-site Tribal Cultural Resources. It is also noted that a South Central Coastal Information Center (SCCIC) records search for Native American historical and archeological resources has been conducted as part of this analysis. The SCCIC records search indicates that no archaeological or built-environment resources are located within the Project site or surrounding areas. (see: California Historical Resources Information System (CHRIS) Report, SCCIC File #18297.4314, South Central Coastal Information Center (SCCIC), November 27, 2017, IS/MND Appendix B). Given the absence of recorded resources, and the urbanized and fully developed/disturbed character of the Project site, it is considered unlikely that any resources of potential significance would be encountered or disturbed during Project development.

The City of Torrance sent notifications regarding the Project to Tribes listed by the NAHC and that have submitted to the City a formal request for notification. The following Tribes were notified by the City:

- Gabrieleno Band of Mission Indians - Kizh Nation;
- Gabrieleno/Tongva San Gabriel Band of Mission Indians;
- Gabrielino/Tongva Nation;
- Gabrielino Tongva Indians of California Tribal Council;
- Gabrielino-Tongva Tribe;
- Santa Rosa Band of Cahuilla Indians; and
- Soboba Band of Luiseno Indians.

Of the above-listed, the Gabrieleno Band of Mission Indians - Kizh Nation has requested consultation regarding the Project. The City of Torrance has entered into the consultation process with the Gabrieleno Band of Mission Indians - Kizh Nation. The City will continue to make good-faith efforts in coordinating consultation with any requesting Tribe.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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As a result of the assessment presented herein, there is no evidence of any known Tribal Cultural Resources on the Project site listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). The Project site has been heavily disturbed by past human activities and is currently developed with business park buildings and parking areas. Any Tribal Cultural Resource that may have been present at one time has likely been destroyed.

Demolition of the buildings and preparation of the construction site are not likely to disturb existing subsurface soil and are not likely to encounter any unknown tribal cultural resources that may remain. While no archaeological or Tribal Cultural Resources were identified within the Project site, there is the potential that buried and previously unrecorded resources could be encountered during construction. Any potential impacts related to discovery of an unknown archaeological or Tribal Cultural Resources at the Project site would be maintained at levels that would be less-than-significant with the incorporation of the following mitigation measures:

Mitigation Measures

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- A. The Project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.
- D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.
- E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe’s sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects

- A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

TCR-3: Procedures for Burials and Funerary Remains:

A. As the Most Likely Descendant (“MLD”), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

G. The Tribe will work closely with the project’s qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

Based on the preceding, the potential for the Project to cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined at Public Resources Code 21074 is considered less-than-significant as mitigated. Please refer also to the discussions presented at IS/MND Checklist Item 5. Cultural Resources.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	9, 17	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please refer to discussion at Checklist Item 18a.

19. UTILITIES AND SERVICE SYSTEMS. Would the project:

(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Project would require only localized modification of area utilities and infrastructure systems. Impacts associated with localized improvement or alteration of infrastructure systems necessary to support the Project are consistent with, and are addressed within the scope of other infrastructure impact analyses presented herein. As discussed herein, these impacts are determined to be less-than-significant. The Project does not propose or require new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Based on the preceding, the potential for the Project to require new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.

(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	2, 7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Project uses are consistent with the range and types of site development anticipated under the City of Torrance General Plan. Water demands under General Plan Buildout Conditions are reflected in the City of Torrance 2015 Urban Water Management Plan (2015 UWMP). By extension, the Project water demands are accounted for in the 2015 UWMP. The 2015 UWMP substantiates that there are sufficient water supplies available to serve the City (including uses that would be implemented by the Project) and reasonably foreseeable future development during normal, dry, and multiple dry years. Based on the preceding, the potential for the Project to result in or be adversely affected by insufficient water supplies is considered less-than-significant.

(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	5, 7, 8, 17	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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The Project would generate additional demands for wastewater treatment services. The Project uses are consistent with development of the site anticipated under the General Plan and wastewater volumes generated by the Project are accounted for and reflected in current and programmed Los Angeles County Sanitation Districts (LACSD) Joint Water Pollution Control Plant wastewater treatment facilities planning. That is, LACSD wastewater treatment facilities construction and planning reflects development of the City pursuant to the City General Plan. Because the Project land uses and development intensities are consistent with the City General Plan, the Project's incremental wastewater treatment demands are reflected in current and planned LACSD wastewater treatment facilities improvements.

Wastewater generated by the Project would be treated at the Joint Water Pollution Control Plant in Carson, which has a design capacity of 400 million gallons per day and currently processes an average of 260 million gallons per day. The site's existing business park occupancies generate approximately 206,000 gallons per day of wastewater. In comparison, depending on the specific occupancies ultimately realized under the Project, the Project uses would generate an estimated 18,250 – 146,000 gallons per day of wastewater. The Project would therefore result in a net decrease of approximately 60,000 – 187,750 gallons of wastewater per day when compared to wastewater generated by the site's existing business park uses.

See also wastewater generation factors presented at: <https://www.lacsd.org/home/showpublisheddocument/3644/637644575489800000>

Based on the preceding, the potential for the Project to exceed current or anticipated wastewater treatment capacities is considered less-than-significant.

- | | | | | | | |
|-----|--|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (d) | Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | 5, 7, 8, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|--|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Project site is currently served by commercial solid waste collection and disposal services. The Project would be required to comply with State and local solid waste reduction, diversion, and recycling policies and regulations. The Project proposes conventional light industrial and would not generate volumes or types of waste not already considered and addressed under existing policies, regulations and infrastructure systems. On this basis, the potential for the Project to generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals is considered less-than-significant.

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|-----|---|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (e) | Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | 5, 7, 8, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|---|-------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

The City has implemented programs to ensure compliance with statewide solid waste source reduction and recycling strategies and targets. The Project would be required to comply with applicable City and state waste diversion and recycling mandates. Moreover, the Project would implement conventional light industrial uses and would not establish uses or activities that would conflict with or obstruct local, state and federal solid waste management regulations. All solid waste generated by the Project would be collected and disposed of as part of the City's municipal waste stream. In this latter regard, solid waste management services are provided throughout the City including collection and transfer of refuse, greenwaste, and bulky items. Recycling services are also provided. The potential for the Project to conflict with federal, state, and local management and reduction statutes and regulations related to solid waste is therefore considered less-than-significant.

20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- | | | | | | | |
|-----|---|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (a) | Substantially impair an adopted emergency response plan or emergency evacuation plan? | 1, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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The City does not lie within a State or Federal Fire Responsibility Area. The City is not classified as a Very High Fire Hazard Severity Zone (VHFHSZ). The Project site and surrounding properties are urbanized. Wildland areas do not exist within or proximate to the Project site. The Project site abuts and is provided direct access to improved and maintained 190th Street (E – W), Toyota Way (E – W), Gramercy Place (N – S), 195th Street (E – W), and Western Avenue (N – S). Access to the developed Project would be provided consistent with Torrance Fire Department requirements. There are no adopted emergency response plans or emergency evacuation plans that would be adversely affected by the Project. Additionally, the Project would implement fire hazard protection and suppression measures stipulated by the Torrance Fire Department through the Project Conditions of Approval.

Based on the preceding, the Project has no potential to substantially impair an adopted emergency response plan or emergency evacuation plan within a State or Federal Fire Responsibility Area, or within lands that are classified as very high fire hazard severity zones. Please refer also to related discussion presented at Checklist Item 9. (g).

- | | | | | | | |
|-----|---|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (b) | Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | 1, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-----|---|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Project site is not located within a designated “High Fire Hazard” area. Nor is the Project site or vicinity properties classified as very high fire hazard severity zones. There are no prevailing conditions (slope, winds, and other factors) that would exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would implement fire hazard protection and suppression measures stipulated by the Torrance Fire Department through the Project Conditions of Approval. Based on the preceding, there is no potential to expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to location within or proximate to a State or Federal Fire Responsibility Area, or within lands that are classified as very high fire hazard severity zones. Please refer also to related discussion presented at Checklist Item 9. (g).

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|-----|---|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (c) | Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | 1, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-----|---|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Project site is not located within a designated “High Fire Hazard” area. Nor is the Project site or vicinity properties classified as very high fire hazard severity zones. The Project proposes conventional light industrial uses in an urbanized area of the City. The Project site abuts and is provided direct access to improved and maintained roadways. Access to the Project would be provided consistent with Torrance Fire Department requirements. All utilities and services are currently available to the Project site. Potential Project impacts associated with localized infrastructure improvements and connections to utilities and services is addressed under relevant topical issues within this IS/MND. The Project does not propose or require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Based on the preceding, the Project has no potential to require the installation or maintenance of associated infrastructure within a State or Federal Fire Responsibility Area, or within lands that are classified as very high fire hazard severity zones that may result in temporary or ongoing impacts to the environment. Please refer also to related discussion presented at Checklist Item 9. (g).

- | | | | | | | |
|-----|--|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (d) | Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | 1, 17 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-----|--|-------|--------------------------|--------------------------|--------------------------|-------------------------------------|

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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The Project site is not located within a designated "High Fire Hazard" area. Nor is the Project site or vicinity properties classified as very high fire hazard severity zones. The Project site is generally level without significant gradients. Adjacent properties evidence similar gradual slopes and do not evidence landslides or the potential to result in landslides. The Project site and surrounding properties do not lie within a designated flood hazard area.

The Project stormwater management concept maintains prevailing drainage patterns. These patterns would not be affected by wildfires or wildfire prevention/suppression measures. All Project stormwater management system improvements would be subject to City review and approval. Additionally, the Project would implement fire hazard protection and suppression measures stipulated by the Torrance Fire Department through the Project Conditions of Approval.

Based on the preceding, the Project has no potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes within a State or Federal Fire Responsibility Area, or within lands that are classified as very high fire hazard severity zones. Please refer also to related discussion presented at Checklist Item 9. (g).

21. MANDATORY FINDINGS OF SIGNIFICANCE:

(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	IS/MND Findings Herein	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Project site is located in a largely urbanized area bordered by development on all sides. Industrial and commercial uses are to the north across 190th Street, with industrial uses to the east across Western Avenue, west across Gramercy Place, and south across 195th Street. The existing buildings at the Project site and other structures in the vicinity do not have any unusual characteristics and are not known to be associated with any national, regional, or local figures of significance that would qualify them as a historical resource or of historic significance. There is no evidence of any known tribal cultural resources on the Project site listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). The Project site remains devoid of threatened or endangered species and does not evidence wetlands or accommodate wildlife or wildlife movement. No candidate, sensitive, or special status species have been identified on the Project site. The Project involves demolition of business park buildings and construction of a new light industrial buildings and parking areas. Any significant adverse impacts, although unlikely, would be maintained at levels that would be less-than-significant with incorporation of mitigation measures presented herein.

On this basis, with the incorporation of mitigation measures, the potential for the Project to: degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory would be less-than-significant.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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(b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	IS/MND Findings Herein	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The analysis presented herein substantiates that the Project would not have any individually or cumulatively considerable impacts. There are no known past, current, or probable future related projects that would interact with the Project and thereby result in cumulatively considerable impacts.

The long-term cumulative impacts in the City, pursuant to the Torrance General Plan (2009), were assessed in the General Plan Update Final Environmental Impact Report (EIR) (SCH No. 2008111046). The General Plan EIR identified certain cumulative impacts such as generation of air pollution, 100-year flood protection, construction noise, traffic congestion, limited solid waste disposal facilities in Los Angeles County and limited water supply for Southern California. These cumulative impacts are considered to be previously assessed. The analysis performed in the General Plan EIR assumed the subject site is developed as a business park use. As substantiated herein, the Project would result in incrementally reduced impacts in total when compared to development of the site with business park uses as envisioned under the General Plan EIR. The Project would not result in cumulative impacts not previously considered and addressed in the General Plan EIR. Therefore, the Project does not have impacts that are individually nor cumulatively considerable.

Based on the preceding, the Project would not result in impacts that are individually limited, but cumulatively considerable; or have environmental effects which will cause substantial adverse effects on human beings, directly or indirectly.

(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	IS/MND Findings Herein	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As substantiated herein, all Project environmental impacts would be less-than-significant or would be or less-than-significant as mitigated. The Project would therefore not result in environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

22. EARLIER ANALYSIS:

This Initial Study incorporates information contained in the City of Torrance General Plan Update and the General Plan Update Final EIR. The General Plan Update provides context for the Project. The General Plan Update Final EIR substantiates, in part, the basis for determining whether the Project may have any significant effects including regional effects, secondary effects, and cumulative impacts. Through incorporation of the General Plan and General Plan EIR, this IS/MND appropriately focuses on potential impacts solely or directly attributable to the Project, which effects have not been otherwise evaluated and substantiated.

ENVIRONMENTAL ISSUES:	Sources	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation	Less-Than-Significant Impact	No Impact
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23. SOURCE REFERENCES:

1. CALFIRE Very High Fire Hazard Severity Zones (VHFHSZ) Map (<https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>)
2. City of Torrance 2015 Urban Water Management Plan (https://torrance.granicus.com/MetaViewer.php?view_id=8&clip_id=12990&meta_id=249859)
3. City of Torrance Climate Action Plan (<https://www.torranceca.gov/our-city/community-development/sustainability/greenhouse-gas-emissions-and-climate-change>)
4. City of Torrance Expansive Soil Foundation Map for Residential Construction (<https://www.torranceca.gov/home/showpublisheddocument/3104/636302824169270000>)
5. City of Torrance Municipal Code (<https://www.codepublishing.com/CA/Torrance/>)
6. City of Torrance Zoning Map (<https://www.torranceca.gov/our-city/community-development/pdf-maps>)
7. City of Torrance 2009 General Plan Update (<https://www.torranceca.gov/our-city/community-development/general-plan/plan-2009>)
8. City of Torrance 2009 General Plan Update Environmental Impact Report, SCH#2008111046 (<https://www.torranceca.gov/our-city/community-development/general-plan/plan-2009>)
9. *California Historical Resources Information System (CHRIS) Report*, SCCIC File #18297.4314, South Central Coastal Information Center (SCCIC), November 27, 2017 (IS/MND Appendix B)
10. *Proposed Torrance Commerce Center Phase 3 Air Quality, Greenhouse Gas, & Health Risk Assessment* (Urban Crossroads, Inc.) November 8, 2021 (Project AQIA/GHGA/HRA, IS/MND Appendix A)
11. *Proposed Torrance Commerce Center Phase 3 Project Traffic Analysis, City of Torrance California* (RK Engineering Group) October 8, 2021 (Project TIA, IS/MND Appendix D)
12. Sanitation Districts of Los Angeles County (<http://www.lacsd.org>)
13. *SRG Torrance Commerce Center Phase III VMT Screening Analysis*, City of Torrance, California (RK Engineering Group) July 15, 2021 (Project VMT Analysis, IS/MND Appendix D)
14. State of California Department of Conservation, Farmland Mapping & Monitoring Program & Williamson Act Program <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx>, and <http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx>
15. State of California Department of Forestry and Fire Protection Fire Hazard Severity Zone Map for Los Angeles County (<http://www.fire.ca.gov>)
16. State of California Department of Toxic Substances Control (<http://www.dtsc.ca.gov>)
17. *Torrance Commerce Center Phase 3 Noise and Vibration Impact Analysis, City of Torrance* (Urban Crossroads) December 20, 2021 (Project Noise Impact Analysis, IS/MND Appendix C).
18. Torrance Toyota Campus III Project Application Materials (Project Application Materials – On File with the City of Torrance Planning Department)

4.0 MITIGATION SUMMARY



City of Torrance, Community Development Department
3031 Torrance Blvd., Torrance, CA 90503 (310) 618-5990
Mitigation Summary

Michelle G. Ramirez, Director

Project Title: Torrance Gateway (Phase III) Project¹

Lead Agency: City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503

Lead Agency Contact: Oscar Martinez
Planning and Environmental Manager
310.618.5990

Project Proponent: Sares Regis Group/SRG Commercial
3501 Jamboree Road, Suite 3000
Newport Beach, CA 92660

Project Location: Southwest corner of 190th Street (E – W) and Western Avenue (N – S) in the City of Torrance. The Project site exists in a “horseshoe” configuration bordered by 190th Street to the north, 195th Street (Toyota Way) to the south; Gramercy Place to the west, and Western Avenue to the east. The Project site comprises current Assessor Parcel Numbers (APNs): 7352-016-040, 7352-016-042, 7352-016-044.

Project Description: The Project proposes up to a total of approximately 730,000 square feet of light industrial uses (warehouse and manufacturing uses) that would productively reuse and redevelop a portion of the previous Toyota Campus Business Park. The Project development concept proposes 5 buildings ranging in size from approximately 135,000 square feet to approximately 159,000 square feet.²

Determination: Based on the information contained in the Initial Study prepared for the Project, the City of Torrance finds that there is no substantial evidence that the Project may have a significant effect on the environment, beyond the impacts previously identified and analyzed in the 2009 General Plan Environmental Impact Report, because the mitigation measures described herein would be incorporated as part of the Project. The 2009 General Plan EIR is a program EIR and identifies the potential unavoidable significant adverse impacts from long-term development in the City. The City of Torrance proposes to adopt a Mitigated Negative Declaration.

¹ The various supporting technical studies cited within and appended to this IS/MND may refer to the Project under various titles. However, the Project itself as evaluated in these technical studies conforms to the Project described in this IS/MND.

² Certain of the supporting technical analyses reflect earlier site plan configurations with individual building square footages differing from those presented elsewhere in this IS/MND. However, the overall scope and configuration of the Project and Project uses evaluated in these technical studies conform in aggregate with the Project described and evaluated in the body text of this IS/MND.



Mitigation Summary

Mitigation Measures Incorporated into the Project to Avoid Significant Effects:

BIOLOGICAL RESOURCES:

BIO-1: Prior to the issuance of demolition or grading permits, the Applicant shall incorporate the following notes on any demolition or grading plans:

“Unless as provided for otherwise below, the Applicant shall remove trees during the non-breeding season (September 1 to end of February) in order to comply with the Federal Migratory Bird Treaty Act and avoid potential takes of active nests including raptors and other migratory non-game birds. If the Applicant has not removed the trees during the non-breeding period and intends to commence construction during March 1 through August 31 (breeding season), the Applicant shall have a USFWS/CDFG approved biologist (Project Biologist) conduct weekly bird surveys.

These surveys shall substantiate the presence/absence of protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allow. The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of clearance/construction work. If a protected native bird is found, the Applicant shall delay all tree clearance/construction disturbance activities within 300 feet of suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the Project Biologist shall continue survey efforts in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by the Project Biologist shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest shall be established in the field with flagging and stakes or construction fencing marking the protected area 300 feet (or 500 feet) from the nest. Construction personnel shall be instructed on the sensitivity of the area. The Project Biologist shall record the results of the protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.”

CULTURAL RESOURCES:

CR-1: In the event that any archaeological materials are encountered during construction activities, all activities shall be suspended in the vicinity of the find. A Project Archaeologist shall be retained and empowered to halt or divert ground disturbing activities. The Project Archaeologist shall coordinate with Native American Tribal or Band monitors interested in monitoring the remaining on-site grading and excavation activities. The Project Archaeologist shall establish a Cultural Resources Treatment and Monitoring Agreement (Agreement) between the property owner and participating Band or Tribe.



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Such Agreement shall include terms for compensation for on-site monitoring and address the treatment and final disposition of any Tribal Cultural Resources, sacred sites and human remains (finds) that are discovered during Project grading and excavation. Said Agreement shall be instituted and completed before ground-disturbing activities can recommence in the area of the find to allow for the recovery of the find. The Project Archaeologist shall describe the find in a Professional Report. The Report shall receive reasonable wide distribution. Any recovered finds shall be prepared to the point of identification. The property owner(s) shall relinquish ownership of all Native American cultural resources to the appropriate local Tribe or Band for treatment and disposition. If determined to be of non-Native American scientific/historical value, recovered materials shall be deposited with a local institution with facilities for their proper curation, analysis, and display. Final disposition and location of any non-Native American recovered materials shall be determined by the City of Torrance.

CR-2: If human remains of any kind are encountered during site disturbing activities, the requirements of CEQA Guidelines Section 15064.5(e) and AB 2641 shall be followed. According to these requirements, all construction activities shall cease immediately and the Los Angeles County Coroner (Coroner) and a qualified archaeologist shall be notified. The Coroner shall examine the remains and determine the next appropriate action based on his or her findings. If the Coroner determines the remains to be of Native American origin, he or she shall notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the most likely descendants (MLD) to be consulted regarding treatment and/or reburial of the remains. If an MLD cannot be identified, or the MLD fails to make a recommendation regarding the treatment of the remains within 48 hours after gaining access to them, the Native American human remains and associated grave goods shall be buried with appropriate dignity on the property in a location not subject to further subsurface disturbance.

GEOLOGY AND SOILS:

GS-1: In the event that any paleontological material (find) is encountered during construction activities, all activities shall be suspended in the vicinity of the find. The City shall be notified immediately and the Applicant shall retain a qualified paleontologist (Project Paleontologist) who shall determine the significance of the find. If the find is determined to be significant, it shall be salvaged and collected in compliance with the applicable regulations and sent to a local institution or museum with facilities for their proper curation, analysis, and display. The Project Paleontologist shall describe the find(s) in a professional report which shall receive reasonable wide distribution. Any recovered finds shall be prepared to the point of identification. The property owner shall relinquish ownership of all paleontological resources to the local institution or designated museum. Final disposition and location of the paleontological resources shall be determined by the City.



Mitigation Summary

TRIBAL CULTURAL RESOURCES:

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The Project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe’s sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates



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that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

TCR-3: Procedures for Burials and Funerary Remains:

A. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six



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months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.