4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have 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?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Have a substantial adverse effect on a scenic vista?

No Impact. The Community Resources Element of the City's General Plan identifies views of the San Gabriel Mountains and Pacific Ocean as scenic. 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 not located within a hillside area. The nearest hillside area is approximately 2 miles southwest of the Project Site. The Project Site is located in a highly urbanized area of the City near the Sepulveda Boulevard and Crenshaw Boulevard corridors, which are developed with a mix of commercial and residential uses. Views in the vicinity of the Project Site and/or that include the Project Site are limited to those of existing development. Any views that might be considered scenic (such as those of mountain ranges, pastoral landscapes, or the ocean) are not readily available from the Project Site area due to distance and intervening development. As such, the proposed development of the Project Site would not have a substantial

adverse effect on a scenic vista. Therefore, no impacts related to scenic vistas would occur as a result of the Project.

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

No Impact. The Project Site is not located within view from a state scenic highway. The closest designated scenic highway is a segment of the Topanga Canyon State Highway located approximately 21 miles northwest of the Project Site.[1] Additionally, the Project Site does not contain any scenic resources, such as rock outcroppings and historic buildings. The Project Site has a limited number of mature trees and vegetation, which are proposed to be removed during construction. However, the vegetation is not considered a scenic resource within a state scenic highway. New landscaping consisting of trees, shrubs, vines, and groundcovers would be installed on the project site. The City Planning Division requires that the Project landscaping plan be submitted for approval prior to building permit issuance. Thus, the Project would not damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings, within a state scenic highway. Therefore, no impacts related to scenic resources would occur as a result of the Project.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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?

Less Than Significant Impact. The Project Site is located in a highly urbanized area of the City near the Sepulveda Boulevard and Crenshaw Boulevard corridors, which are developed with a mix of commercial and residential uses. The Project Site is currently developed with a 69,913-square-foot Los Angeles County Department of Children and Family Services (DCFS) office building and associated landscaping and surface parking. The Project includes demolition and removal of all existing improvements from the Project Site and development of the site with 272 residential dwelling units in buildings ranging from three stories to five stories with building heights ranging from 45 feet to 68 feet and associated landscaping, open space, and parking. The Project would be required to comply with Article 30 (Development Standards) of the City's Municipal Code.

> **92.30.2 OUTSIDE EQUIPMENT**
>
> All roof and wall appurtenances, such as ducts and vents, all mechanical equipment, electrical boxes, meters, pipes, transformers, air conditioners and all other equipment on the roof or walls of any building shall be completely screened

[1] *Caltrans, California State Scenic Highway System Map, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed February 2, 2024.*

from public view with materials compatible with the main buildings on the subject property. Such equipment or screening material shall be constructed in such a manner that noises emanating from the roof or wall appurtenances shall not be audible beyond the property lines of the subject property.

92.30.3 ENCLOSURE OF TRASH, LOADING AND STORAGE AREAS

All exterior loading, unloading and storage areas, and all trash storage areas, shall be completely enclosed by decorative walls and doors constructed of material, and of a design, color and texture which is architecturally compatible with the buildings and structures on the property. All such enclosure doors shall remain closed except during the actual loading or unloading of material, or the addition or removal of trash. Solid, opaque perimeter walls and gates may be used to satisfy all of the above requirements, except those applying to trash storage areas, if the Planning Director finds that:

a) The exterior loading and/or material storage areas will be screened from view, due to the presence of the perimeter walls and gates; and
b) Use of the perimeter walls and gates to provide said screening will not be detrimental to any adjacent property.

92.30.4 TIME FOR PICKUP, DELIVERY AND PARKING LOT SWEEPING

Pickups and deliveries of products, material or trash and parking lot sweeping shall not be allowed prior to 7:00 A.M. or after 10:00 P.M., unless such operations can be conducted at a distance of no less than three hundred (300) feet from the nearest residence.

Pickups and deliveries of products or material shall not be made into or out of any driveway which has its access on a local or collector street where there are residential uses within three hundred (300) feet of such driveway. The pickup of trash shall not be made by means of a driveway which has its access on a local or collector street where there are residential uses within three hundred (300) feet of such driveway unless the property on which the trash is being picked up is itself used for residential purposes.

92.30.5 LIGHTING

ALL LIGHTING on the subject property shall be constructed in such a manner that glare shall be directed away from all surrounding residential land uses.

92.30.6 LANDSCAPING

A landscape plan for the subject property shall be approved by the City and said landscape plan shall comply with Article 6, Chapter 3, Division 9 of the Torrance Municipal Code.

92.30.7 DIMENSIONS OF DRIVEWAYS, AISLES, PARKING SPACES AND LANDSCAPING

The dimensions of all driveways, aisles, parking spaces, and landscaping shall be shown on the plot plan of the subject property, and shall not be changed without the approval of the City. Features such as walls, hedges, architectural embellishments, utility meters, planters, low eaves, power poles and other projections shall not reduce the dimension of the driveways, aisles, parking spaces or landscaped areas below the size shown.

92.30.8 ACCESS TO LOCAL STREETS PROHIBITED

No vehicular access shall be permitted to a local street from a commercially or industrially zoned through lot which also has frontage on a major or secondary street. In no case shall a commercial or industrial lot be developed in such a manner that traffic from the commercial or industrial uses on it will be channeled onto any residential streets.

92.30.9 BUILDING SETBACK REQUIREMENTS

No building which is designed, used, or intended to be used for nonresidential uses shall be located closer than ten (10) feet from the lot line of any adjacent residentially zoned parcel of land. Said setback of ten (10) feet shall be landscaped and shall be provided with an irrigation system, and vehicles shall not be permitted to park in said setback area. The provisions of this Section shall not apply in the event the provisions of any particular zone or zoning approval granted by the City are more restrictive.

Additionally, the proposed uses are allowed under the existing Planned Development zoning for the Project Site, and the Project would meet all applicable zoning regulations. Thus, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Therefore, Project impacts related to this issue would be less than significant.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The Project Site is located in a highly urbanized area of the City near the Sepulveda Boulevard and Crenshaw Boulevard corridors, which are developed with a mix of commercial and residential uses and roadway infrastructure with various sources of light and glare, such as building lighting, street and vehicle lighting, and light-reflective surfaces. Additionally, the Project Site is bounded by a residential neighborhood on the north, a private roadway (Park Del Amo) on the east; commercial office buildings, surface parking, and a hotel on the south; and a residential neighborhood on the west. Land uses within the greater Project Site area include mixed commercial uses along Crenshaw Boulevard and Sepulveda Boulevard; residential neighborhoods;

Charles H. Wilson Park; and schools including Ambassador High School, Shery High School, and Torrance Elementary School. Also, the Project Site is currently developed with a 69,913-square-foot DCFS office building and associated landscaping and surface parking. All existing development on and surrounding the Project Site include sources of existing light and glare, typical of an urban area.

The Project includes demolition and removal of all existing improvements (including existing sources of light and glare) from the Project Site and development of the site with 272 residential dwelling units and associated landscaping, open space, and parking. Exterior lighting would include building fixtures and pedestrian-scale lighting along pathways, both for security and wayfinding purposes, and street lighting at Project Site entrances and along the proposed fire access road that would extend around most of the Project Site. All Project lighting would comply with Section 92.30.5 (Lighting), "All lighting on the subject property shall be constructed in such a manner that glare shall be directed away from all surrounding residential land uses." The design, configuration, and orientation of the proposed building materials and lighting fixtures would be subject to City review and approval, which would ensure that the proposed building materials and lighting would not create new sources of substantial light or glare that would adversely affect the surrounding areas. While the Project would change the lighting conditions at the Project Site, given the highly urbanized condition of the Project Site and the surrounding area, no substantial changes in nighttime illumination would occur that would adversely affect nighttime views in the area and prevent spillover lighting. Also, the Project would use non-reflective glass. Thus, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, Project impacts related to light and glare would be less than significant.

Cumulative Impacts

There are 6 related projects in the vicinity of the Project Site (refer to Appendix A). None of the related projects is within visual proximity of the Project Site, and none shares scenic resources or scenic vistas with the Project. The degree to which these related projects would comply with regulations governing scenic quality would be considered on a project-by-project basis by the City, and the related projects would be required to comply with applicable design standards as enforced by the lead agencies. Because the related projects are infill development in a highly urbanized area, the potential increase in light and glare would be negligible, as the related projects would replace existing uses with existing sources of light and glare and would be required to comply with existing regulations related to lighting and low-glare building materials. No significant cumulative aesthetics impacts would occur.

II. AGRICULTURE AND FORESTRY 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 Department 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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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?

No Impact. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category.[2] Additionally, no agricultural uses or related operations are present within the Project Site or in the surrounding area. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is not zoned for agricultural use, and the site is not under Williamson Act contract.[3] Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. Therefore, no impacts related to this issue would occur as a result of the Project.

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))?

No Impact. The Project Site is not zoned as forest land or timberland, nor does the site contain any forest land or timberland. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is located within an urbanized environment and does not contain any forest land. Therefore, no impacts related to this issue would occur as a result of the Project.

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[2] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.*

[3] *Ibid.*

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?

No Impact. The Project Site and surrounding area are developed with urban land uses. No agricultural uses are located on the Project Site or within the area. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

The 6 related projects listed in Appendix A are located in highly urbanized areas. Neither the Project Site nor any of the related projects' sites are used for or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

The information and analysis in this section is based primarily on the following (refer to Appendix B):

- *Air Quality and GHG emissions Technical Data, NTEC, July 2023.*

Regulatory Framework

Federal

Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California, the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), particulate matter 2.5 microns ($PM_{2.5}$), particulate matter 10 microns (PM_{10}), sulfur dioxide (SO_2), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown in Table III-1. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and Pb.

State

California Clear Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California, the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the state to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS defines clean air, representing the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, $PM1_0$,

and $PM_{2.5}$. The state standards and attainment/non-attainment are also shown in Table III-1.

California Air Toxics Program

CARB's Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs) and determine whether any regulatory action is necessary to reduce their risks to public health. Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

Air Quality and Land Use Handbook: A Community Health Perspective

Released by CARB in 2005, the *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses.[4] The recommendations are advisory and should not necessarily be interpreted as defined "buffer zones"; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

Regional

South Coast Air Quality Management District

The Project is located within the 6,745-square-mile South Coast Air Basin (Basin). The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain CAAQS established by CARB and NAAQS established by the USEPA. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to, the following:

4 *CARB, Air Quality and Land Use Handbook, A Community Health Perspective, April 2005.*

Table III-1
State and Federal Ambient Air Quality Standards and Attainment for L.A. County

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Ozone – O_3	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	-	-
	8-hour	0.070 ppm (137 µg/m^3)	Non-attainment	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter – PM_{10}	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	-	-
Fine Particulate Matter – $PM_{2.5}$	24-hour	-	-	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide – CO	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment
Nitrogen Dioxide – NO_2	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Attainment
Sulfur Dioxide – SO_2	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	-	-
Lead – Pb	30-day average	1.5 µg/m^3	Attainment	-	-
	Calendar Quarter	-	-	0.15 µg/m^3	Non-attainment

Source: Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed July 20, 2023.

- Rule 401 Visible Emissions: This rule prohibits air discharge that results in a plume that is as dark as or darker than what is designed as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.

- Rule 402 Nuisance: This rule prohibits the discharge of "such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

- Rule 403 Fugitive Dust: This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

2022 Air Quality Management Plan

The 2022 Air Quality Management Plan (2022 AQMP) was adopted in December 2022 and represents the most updated regional blueprint for achieving federal air quality standards. It relies on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments (SCAG) and their 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS).

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, along with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP. The 2020-2045 RTP/SCS, SCAG's latest long-range plan, continues to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. In short, the 2020-2045 RTP/SCS offers a blueprint for how Southern California can grow more sustainably. The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's Priority Growth Areas (PGAs) and aims to enhance and build out the region's transit network. PGA's such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for just four percent of total land in the SCAG region, but they are projected to accommodate 64 percent of the region's future household growth and 74 percent of the region's future employment growth by 2045.[5] According to the 2020-2045 RTP/SCS, dense infill development in PGAs can help reduce travel distances, increase

5 *SCAG, Final 2020-2045 RTP/SCS, September 2020.*

mobility options, and improve access to workplaces and other destinations, reducing vehicle miles traveled (VMT) and associated emissions.

City of Torrance

2009 General Plan

The City addresses air quality in the Community Resources Element of its General Plan.[6] The Community Resources Element contains the following air quality-related objectives and policies:

Objective R-3:	To contribute to the improvement of local and regional ambient air quality to benefit the health of all.
Policy CR.13.1:	Continue to participate in the efforts of the State Air Resources Board and the South Coast Air Quality Management District to meet State and federal air quality standards.
Policy CR.13.2:	Work with neighboring cities to implement local and regional projects that improve mobility on freeways and railways, reduce emissions, and improve air quality.
Policy CR.13.3:	Support regional air quality goals through conscientious land use and transportation planning and the implementation of resource conservation measures.
Policy CR.13.4:	Balance the achievement of clean air with other major goals of the City.
Policy CR.13.5:	Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling.
Policy CR.13.6:	Promote citizen awareness and participation in programs to reduce air pollution and traffic congestion.
Policy CR.13.7:	Encourage the use of alternative fuel vehicles and re-refined oil.
Policy CR.13.8:	Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality.

6 *City of Torrance, 2009 General Plan, April 2010.*

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the USEPA due to their potentially harmful effects on public health and the environment. These "criteria air pollutants" include carbon monoxide, ground-level ozone, nitrogen dioxide, sulfur dioxide, particulate matter ten microns or less in diameter, particulate matter 2.5 microns or less in diameter, and lead. The following descriptions of each criteria air pollutant and their health effects are based on information provided by the USEPA and the SCAQMD.[7,8]

Carbon Monoxide – CO

CO is a colorless and odorless gas that is released when something is burned. Outdoors, the greatest sources of CO are cars, trucks, and other vehicles or machinery that burn fossil fuels. Unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves can release CO and affect air quality indoors. Breathing air with elevated concentrations of CO reduces the amount of oxygen that can be transported via the blood stream and can lead to weakened heart contractions; as a result, CO inhalation can be particularly harmful to people with chronic heart disease. At moderate concentrations, CO inhalation can cause nausea, dizziness, and headaches. High concentrations of CO may be fatal. However, such conditions are not likely to occur outdoors.

Ozone – O_3

O_3 is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_X emissions is automobile exhaust. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O_3 irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide – NO_2

NO_2 is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating a mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO_2 also

7 *USEPA, Criteria Air Pollutants, www.epa.gov/criteria-air-pollutants.*
8 *SCAQMD, Final 2012 Air Quality Management Plan, February 2013.*

contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO_2 may even contribute to the development of asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

Sulfur Dioxide – SO_2

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the predominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO_2 may aggravate lung diseases, especially bronchitis. It also constricts breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposure to both pollutants leads to higher rates of respiratory illnesses.

Particulate Matter (PM_{10} and $PM_{2.5}$)

The human body naturally prevents the entry of larger particles into itself. However, smaller particles less than 10 microns (PM_{10}) or even less than 2.5 microns ($PM_{2.5}$) in diameter can enter the body and become trapped in the nose, throat, and upper respiratory tract. Here, these particulates may aggravate existing heart and lung diseases, affect the body's defenses against inhaled materials, and damage lung tissue. Those most sensitive to PM_{10} and $PM_{2.5}$ include children, the elderly, and those with chronic lung and/or heart disease.

Lead – Pb

Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead emissions. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

Toxic Air Contaminants

TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. As discussed earlier, CARB and OEHHA

determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[9]

One key TAC is diesel particulate matter (diesel PM), which is emitted in diesel engine exhaust. Released in 2021 by the SCAQMD, the Multiple Air Toxics Exposure Study V (MATES V) determined that about 88 percent of the carcinogenic risk from air toxics in the Basin is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from gas- and diesel-powered vehicle emissions – diesel PM from primarily trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM is responsible for the greatest potential cancer risk from vehicle traffic.[10] Overall, diesel PM was found to account for, on average, about 50 percent of the air toxics risk in the Basin.[11] In addition to its carcinogenic potential, diesel PM may also contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.[12]

Volatile Organic Compounds - VOCs

VOCs are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g., NO_X, CO, SO_2…) and contribute to the formation of photochemical smog.

Existing Conditions

As discussed earlier, the Project is located within the 6,745-square-mile Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. The USEPA has classified Los Angeles County as a nonattainment area for O_3, $PM_{2.5}$, and lead, meaning that the Basin does not meet NAAQS for these pollutants. Additionally, this portion of the Basin also does not meet CAAQS for O_3, PM_{10}, and $PM_{2.5}$. Table III-1 summarizes State and National Ambient Air Quality Standards and the attainment status for Los Angeles County with respect to each criteria pollutant.

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9 *CARB, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.*

10 *CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.*

11 *SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V), 2021.*

12 *CARB, Overview: Diesel Exhaust & Health, ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.*

Air Quality Monitoring Data

The SCAQMD monitors air quality conditions in 38 source receptor areas (SRAs) throughout the Basin. The Project is located in SCAQMD's SRA No. 3, "Southwest Los Angeles County Coastal." Table III-2 shows pollutant levels, state and federal standards, and the number of exceedances recorded in SRA No. 3 from 2019 through 2021. The one-hour state standard for O_3 was exceeded once during this three-year period, and the federal standard was exceeded twice. The 24-hour state standard for PM_{10} was also exceeded twice. Other pollutant levels did not exceed their respective CAAQS or NAAQS during this period.

Existing Health Risk

The Multiple Air Toxics Exposure Study V (MATES V) is the latest air toxics monitoring and evaluation study conducted in the Air Basin. In short, MATES V is a modeling effort to characterize risk from air toxics across the Air Basin. Based on the MATES V model, the calculated cancer risk from air toxics in the Project's zip code (90503) is approximately 401 in one million, which is below the Air Basin's average risk of 454 per one million. To put this figure into context, the air toxics risk in the Project's zip code is lower than it is for approximately 69.0 percent of the population within the Basin.[13]

The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that identifies which California communities are disproportionately burdened by, and vulnerable to, multiple sources of pollution. The tool ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors, and the prevalence of certain health conditions. According to CalEnviroScreen 4.0, the Project Site's census tract is ranked 42nd percentile. The tract's pollution-specific burden, irrespective of other factors, is ranked 57th percentile, indicating that its pollution burden is slightly above average for the state.[14]

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13 *SCAQMD, Multiple Air Toxics Exposure Study V, MATES Data Visualization Tool, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A304&views=view_1. Accessed July 21, 2023.*

14 *Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0. https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40. Accessed July 21, 2023.*

Table III-2
Ambient Air Quality Data – SRA No.3 "Southwest Los Angeles County Coastal"

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of State/Federal Standards Exceedance		
	2019	2020	2021
Ozone – O_3			
Maximum 1-hour Concentration (ppm)	0.082	0.117	0.059
Days > 0.09 ppm (State 1-hour standard)	0	1	0
Days > 0.070 ppm (Federal 8-hour standard)	0	2	0
Carbon Monoxide – CO			
Maximum 1-hour Concentration (ppm)	1.8	1.6	1.7
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.3	1.3	1.3
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide – NO_2			
Maximum 1-hour Concentration (ppm)	0.0566	0.0597	0.0628
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration (µm/m^3)	62	43	33
Days > 50 µg/m^3 (State 24-hour standard)	2	0	0
$PM_{2.5}$			
Maximum 24-hour Concentration (µg/m^3)	N/A	N/A	N/A
Days > 35 µg/m^3 (Federal 24-hour standard)	N/A	N/A	N/A
Sulfur Dioxide – SO_2			
Maximum 1-hour Concentration (ppb)	8.2	6.0	7.7
Days > 0.04 ppm (State 24-hour standard)	0	0	0
Lead - Pb			
Maximum Monthly Average Concentration (µg/m^3)	0.004	0.008	0.003
Maximum 3-Month Rolling Averages (µg/m^3)	0.004	0.005	0.004

N/A = data not available
ppm = parts per million of air, by volume
µg/m^3 = micrograms per cubic meter
Source: SCAQMD Historical Data By Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year. Accessed July 21, 2023.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Generally speaking, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a

result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), childcare centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities. For the purposes of CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. The SCAQMD does not consider commercial and industrial facilities to be sensitive receptors because employees do not typically remain onsite at such facilities for 24 hours but are present for shorter periods (such as eight-hour shifts). However, the SCAQMD suggests that LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, may also be applied to receptors such as commercial and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to eight hours.[15]

The Project Site is surrounded by a diverse mix of residential, commercial, and recreational land uses. The nearest sensitive receptors are residential land uses located directly north and east of the Project Site along Woodbury Drive and within the La Terrazza residential complex. The Courtyard by Marriott Hotel (2633 Sepulveda Boulevard) is located approximately 60 feet south of the Project Site. The Tradewinds multi-family residential building (2605 Sepulveda Boulevard) is located approximately 180 feet to the south. The nearest school land use, Ambassador High School (2300 Crenshaw Boulevard), is located approximately 800 feet east of the Project Site, across Crenshaw Boulevard.

Other nearby non-sensitive receptors where workers or other users may be present for one to eight or more hours include a multitude of commercial land uses. The nearest commercial use is Park Del Amo (2377 Crenshaw Boulevard), an office complex approximately 80 feet southwest of the Project Site.

Receptors that are farther from the Project than the previously identified receptors would experience lesser impacts from the Project's emissions.

Existing Project Site Emissions

The Project Site is currently improved with a one-story, 63,875-square-foot commercial office building, currently occupied by the Los Angeles County Department of Children and Family Services. The Project Site also includes a surface parking lot containing 347 vehicle parking spaces in support of this use. Existing emissions associated with this existing use were estimated and are shown below in Table III-3 for informational purposes.

15 *SCAQMD, Final Localized Significance Threshold Methodology, June 2003. Revised July 2008.*

Table III-3
Existing Project Site Daily Operations Emissions

Emissions Source	Emissions in lbs per day					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area	2.01	0.02	2.78	<0.01	<0.01	<0.01
Energy	0.02	0.43	0.37	<0.01	0.03	0.03
Mobile Sources	5.51	4.90	49.2	0.10	9.05	2.35
Total Regional Emissions[1]	**7.54**	**5.34**	**52.3**	**0.11**	**9.09**	**2.38**
Total Localized Emissions	**2.03**	**0.45**	**3.15**	**<0.01**	**<0.03**	**<0.03**

[1] *Some figures may not add up properly due to rounding and differences between summer and winter emissions.*

Source: NTEC, 2023. Refer to Appendix B.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant. The following analysis assesses the Project's consistency with the SCAQMD's 2022 AQMP and SCAG's latest 2020-2045 RTP/SCS. As discussed earlier, the 2022 AQMP's projections for achieving state and federal air quality goals are based on population, housing, and employment trend assumptions in the 2020-2045 RTP/SCS, which are themselves largely based on growth forecasts from local governments like the City of Torrance. Thus, a project is consistent with the 2022 AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the formation of the AQMP.

The Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS. As noted earlier, Priority Growth Areas (PGAs) such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for only four percent of the region's total land area, but the 2020-2045 RTP/SCS anticipates that 64 percent of new household growth will occur in these PGAs. According to the 2020-2045 RTP/SCS, dense infill development in PGAs can support the goals of the 2020-2045 RTP/SCS by reducing travel distances, increasing mobility options, improving access to workplaces, and conserving the region's resource areas. The Project Site is located in a PGA – specifically an NMA. The 2020-2045 RTP/SCS targets growth in NMAs because of NMA's robust residential to non-residential land use connections and high roadway intersection densities. These features promote safer, multimodal, short trips and can reduce reliance on single occupancy vehicles, reducing VMT. In fact, according to the Project's Transportation Screening Analysis Memorandum, the Project Site is located in an area that generates daily VMT on a per capita basis that is 15 percent or more below the LA County Home-Based VMT per Capita. Thus, development of the Project at the Project Site would be consistent with the 2020-2045 RTP/SCS's goals and growth assumptions

that emphasize infill residential land use development in PGAs. The Project would not result in growth – or accompanying emissions – that are unaccounted for by the 2020-2045 RTP/SCS or the 2022 AQMP.

In addition to the 2022 AQMP and 2020-2045 RTP/SCS, the City of Torrance General Plan also identifies a variety of policies to directly or indirectly improve air quality conditions within the City and greater region. Not all of these policies are directly applicable to the Project, which is a private land use development. These policies are also not requirements of the Project. As shown in Table III-4, the Project would not conflict with the General Plan's air quality-related policies.

Table III-4
Project Consistency with City of Torrance General Plan

Strategy	Project Consistency
Policy CR.13.1 – Continue to participate in the efforts of the State Air Resources Board and the South Coast Air Quality Management District to meet State and federal air quality standards.	**No Conflict –** This air quality analysis utilizes SCAQMD-recommended thresholds that measure the potential for project emissions to result in or substantially contribute to exceedances of state and federal air quality standards.
Policy CR.13.2 – Work with neighboring cities to implement local and regional projects that improve mobility on freeways and railways, reduce emissions, and improve air quality.	**No Conflict –** This policy directs the City to collaborate with neighboring cities on transportation projects.
Policy CR.13.3 – Support regional air quality goals through conscientious land use and transportation planning and the implementation of resource conservation measures.	**No Conflict –** As explained earlier, the 2020-2045 RTP/SCS is the region's foremost land use and transportation planning strategy document to increase mobility while achieving more sustainable patterns of growth. As discussed in response to Checklist Question XIV(a) (Population and Housing – Unplanned Growth) of the IS/MND, the Project would be consistent with the growth patterns promoted by the 2020-2045 RTP/SCS.
Policy CR.13.4 – Balance the achievement of clean air with other major goals of the City.	**No Conflict** – This policy applies to City decision making.
Policy CR.13.5 – Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling.	**No Conflict** – The development of the dense residential infill uses in a NMA would be consistent with regional land use and transportation planning best practices to reduce VMT and foster increased usage of alternative transportation modes.

Table III-4
Project Consistency with City of Torrance General Plan

Strategy	Project Consistency
Policy CR.13.6 – Promote citizen awareness and participation in programs to reduce air pollution and traffic congestion.	**No Conflict –** This policy applies to the City.
Policy CR.13.7 – Encourage the use of alternative fuel vehicles and re-refined oil.	**No Conflict** – The Project would include EV-charging infrastructure in accordance with the State's latest CALGreen requirements. It is further worth noting that the state's current EV-charging requirements vastly exceed those that were in place at the time of the General Plan's adoption (2010). Thus, the Project's EV-charging infrastructure would greatly exceed requirements that were in place at the time this policy was adopted.
Policy CR.13.8 – Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality.	**No Conflict** – The Project would be built in accordance with the latest CALGreen energy efficiency standards. Current standards greatly exceed those that were in place at the time this policy was adopted.
Source: NTEC, 2023.	

To summarize the analysis in response to Threshold (a): (1) The Project would not exceed the 2022 AQMP's assumptions that are themselves based on SCAG's RTP/SCS projections; (2) the Project's location in an NMA would be consistent with the latest regional land use and transportation planning strategies to reduce VMT and associated air emissions; (3) to be discussed below, air emissions associated with the Project's construction and operations would neither exceed nor contribute to any exceedance of ambient air quality standards and thresholds, nor would they interfere with the AQMP's attainment of air quality standards or interim emissions reductions. Therefore, Project impacts related to AQMP consistency would be less than significant.

b) Would the project 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less than Significant Impact. The Project would contribute to local and regional air pollutant emissions during its construction (short-term) and operations (long-term). However, as demonstrated by the following analysis, construction and operation of the

Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment.

Construction Emissions

Construction of the Project is anticipated to last approximately 30 months (refer to Table 3-6 in Section 3 [Project Description]). During this time, a variety of diesel-powered vehicles and equipment would be operated on-site. For example, grading would require earthmoving vehicles such as excavators, bulldozers, and loaders. The Project would also require off-site sewer improvements along a portion of Crenshaw Boulevard between 230th Street and 233rd Street. This work would last approximately four months and may overlap with construction of the Project.

The Project's unmitigated maximum daily regional and local emissions from construction at the main Project Site, as estimated using the CalEEMod 2022 model, are shown in Table III-5. Unmitigated maximum daily regional and local emissions from construction of the off-site sewer improvements are shown separately in Table III-6. Table III-7 shows emissions that would result from potentially overlapping construction at the main Project Site and the off-site sewer improvements. The applicable regional thresholds and LSTs for each air pollutant are also shown for comparison in each table. Because the SCAQMD's regional and localized significance thresholds for construction emissions are representative of maximum daily emissions that would not be expected to cause or contribute to an exceedance of the most stringent NAAQS or CAAQS for pollutants, the objective of the Project's CalEEMod analysis is to determine whether the Project's maximum one-day construction emissions would have the potential to exceed these thresholds. As such, the Project's CalEEMod analysis relies on conservative construction assumptions in an effort to conclusively rule out the possibility that threshold exceedances could occur. Construction is a dynamic process and day-to-day emissions can vary widely, even within the same construction phase or sub-phase. This analytical approach minimizes the potential for inadvertently underestimating daily construction emissions, which are the basis of SCAQMD's air pollutant thresholds. The likelihood that the maximum daily construction emissions estimated by this analysis would occur on a given construction workday is low; the likelihood that they would occur every day for the duration of a construction phase is zero.

Table III-5
Project Site: Maximum Regional and Localized Daily Construction Emissions

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Maximum Regional Emissions						
2025	2.76	46.2	38.1	0.18	9.86	4.03
2026	2.35	15.4	35.0	0.04	4.89	1.46
2027	23.1	22.7	44.9	0.06	5.00	1.87
Maximum Regional Emissions	23.1	46.2	44.9	0.18	9.86	4.03
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Demolition	2.64	24.23	27.31	0.04	4.16	1.41
Grading	2.25	21.39	28.38	0.04	3.69	2.15
Building Construction (2025)	1.25	12.32	14.85	0.01	0.48	0.43
Building Construction (2026)	1.20	11.71	14.85	0.03	0.41	0.38
Building Construction (2027)	1.15	11.21	14.75	0.03	0.37	0.34
Paving	0.75	4.34	5.91	0.01	0.18	0.17
Architectural Coatings	19.95	3.32	4.50	0.01	0.08	0.07
Overlap of Building Construction (2027), Paving, and Architectural Coatings	21.85	18.81	25.22	0.05	0.63	0.58
Maximum Localized Emissions	21.85	24.23	28.38	0.05	4.16	2.15
Localized Significance Threshold[1]	-	197	1,796	-	15	8
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

[1] *Localized significance thresholds assume a five-acre project size and a 25-meter receptor distance, commensurate with Project details and distances to nearby sensitive receptors surrounding the Project Site.*

Source: NTEC, 2023.

The modeling also accounts for SCAQMD Rule 403 for fugitive dust. SCAQMD Rule 403 contains general requirements applicable to all fugitive dust sources, including the Project's construction, that involve minimizing visible emissions and reducing trackout from site driveways. SCAQMD Rule 403(d)(2) requires all sources to implement "best available control measures" (BACMs) for fugitive dust. The BACMs, which are included in Table 1 of the regulation, require sources to adopt measures such as pre-watering soils prior to cut and fill activities, stabilizing soils during and after cut and fill activities, and stabilizing disturbed soils with water or other stabilizing agents to prevent the generation of visible dust plumes. Thus, the Project's soil stabilization and trackout reduction procedures would not be required, conducted, or enforced pursuant to any CEQA

mitigation: these procedures would be mandatory as a matter of SCAQMD Rule 403 compliance.

Table III-6
Off-Site Sewer Improvements: Maximum Regional and Localized Daily Construction Emissions

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Maximum Regional Emissions						
2025	1.37	16.3	18.7	0.05	3.66	1.62
Maximum Regional Emissions	1.37	16.3	18.7	0.05	3.66	1.62
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Trenching	0.19	1.72	3.54	0.01	0.07	0.07
Sewer Installation	0.11	1.10	1.91	<0.01	0.04	0.04
Backfilling	0.62	5.71	6.34	0.01	1.53	0.89
Paving	0.22	1.79	2.48	<0.01	0.08	0.08
Overlap of Sewer Installation, Backfilling, and Paving	0.95	8.6	10.73	0.01	1.65	1.01
Maximum Localized Emissions	0.95	5.71	10.73	0.01	1.65	1.01
Localized Significance Threshold[1]	-	91	664	-	5	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

[1] *Localized significance thresholds assume a one-acre project size and a 25-meter receptor distance, commensurate with Project details and distances to nearby sensitive receptors surrounding the off-site sewer improvement location along Crenshaw Boulevard (see Table 4 and accompanying text for additional explanation).*

Source: NTEC, 2023.

As shown in Table III-5, Table III-6, and Table III-7 and discussed below, the Project's regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Local emissions also would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's construction-related emissions impacts on regional and localized air quality would be less than significant.

Table III-7
Maximum Overlapping Regional Daily Construction Emissions

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Maximum Regional Emissions						
Project Site	23.1	46.2	44.9	0.18	9.8	4.03
Off-Site Sewer Improvements	1.37	16.3	18.7	0.05	3.66	1.62
Maximum Overlapping Regional Emissions	24.47	62.5	63.6	0.2	13.52	5.65
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: NTEC, 2023.

Table III-5 shows regional and localized emissions that would result from construction of the Project at the Project Site. As shown, regional emissions associated with this construction would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Local emissions from construction at the Project Site also would not exceed the applicable SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

Table III-6 shows the regional and localized emissions that would result from construction of the off-site sewer improvements along Crenshaw Boulevard. As shown, regional emissions associated with this construction would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Local emissions from construction at this location also would not exceed the applicable SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

As noted earlier, off-site sewer improvements may overlap with construction of the Project at the main Project Site. However, as shown in Table III-7, even if maximum regional emissions from both construction sites were to occur simultaneously, the resultant emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. With regard to simultaneous localized emissions and LSTs, these construction sites would be located over 2,000 feet apart. There would be no potential for the sites' localized emissions to result in cumulative exceedances of SCAQMD LSTs at any sensitive receptors. Therefore, Project impacts related to this issue would be less than significant.

Operational Emissions

Emissions associated with the Project's operations were also calculated using CalEEMod 2022 model. As shown in Table III-8, development of the Project would not introduce any major sources of air pollution. Maximum daily emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$, nor would they exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's operations-

related emissions impacts on regional and localized air quality would be less than significant.

Table III-8
Maximum Regional and Localized Operational Emissions

Emissions Source	Emissions in lbs per day					
	VOC	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Area	12.3	0.24	25.7	<0.01	0.03	0.02
Energy	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Mobile Sources	4.51	3.59	37.7	0.09	8.18	2.12
Project Regional Emissions[1]	168	3.59	63.4	0.09	8.21	2.14
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Localized Emissions	12.3	0.24	25.7	<0.01	0.03	0.02
Localized Significance Thresholds	-	197	1,796	-	4	2
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

[1] *Some figures may not add up properly due to rounding and differences between summer and winter emissions.*

Source: NTEC, 2023.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. As discussed in detail below, the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, Project impacts related to this issue would be less than significant impact.

Construction Emissions

As discussed previously, the Project's construction emissions would not exceed the SCAQMD's regional significance thresholds. Construction emissions also would not exceed SCAQMD LSTs, meaning that nearby sensitive receptors generally located 25 meters or farther from the Project would not be exposed to substantial criteria pollutant concentrations that would present a public health concern.

The primary TAC generated by the Project's construction activities would be diesel PM, which would be released from the exhaust pipes of diesel-powered construction vehicles and equipment. According to SCAQMD methodology, health risks from carcinogenic air toxics such as diesel PM are usually quantified in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 30-year period every day will contract cancer based on standard risk-assessment methodology.

However, the anticipated duration of construction activities associated with the Project's implementation is only approximately 30 months, and daily diesel PM emissions would vary considerably day by day, and by phase. As shown earlier, the Project's maximum daily PM emissions, which include exhaust PM, would not exceed applicable regional thresholds and LSTs. As explained previously, the maximum daily construction emissions are conservative estimates that are not likely to occur on a given construction workday, let alone every day for the entire duration of construction. Given these considerations, the Project would not expose sensitive receptors to substantial pollutant concentrations during construction. Therefore, the Project's construction air quality impacts on sensitive receptors would be less than significant.

Operational Emissions

As also discussed previously, the Project's operational emissions would not exceed SCAQMD regional significance thresholds or LSTs.

The Project does not propose typical sources of acutely and chronically hazardous TACs, such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. Neither CARB nor the SCAQMD identify the Project's land use type as a source of substantial TAC emissions. As a result, the Project's operations would not warrant the need for a health risk assessment, and this impact would be less than significant.

Though the Project would generate traffic that produces and contributes to off-site emissions, Project traffic generation would not result in exceedances of CO air quality standards at nearby roadways due to three key factors. First, CO hotspots are rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology and the increasing penetration of this technology in the vehicle fleet. No exceedances of CO have been recorded at nearby monitoring stations for some time, and the Basin is currently designated as a CO attainment area for both CAAQS and NAAQS. Third, the Project would not contribute to the levels of congestion and emissions necessary to trigger a potential CO hotspot. In fact, the Project would result in a net decrease of 55 vehicle trips per day as compared to the Project Site's existing government office building use. Thus, the Project's operational air quality impacts on sensitive receptors would be less than significant.

d) Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. During construction of the Project, odors would primarily be emitted from heavy-duty equipment exhaust. Other potential sources that may produce objectionable odors during construction activities include asphalt paving. Odors from construction equipment and asphalt paving would be localized, generally confined to the immediate area surrounding the project site, temporary, and cease after construction and

paving activities are completed. SCAQMD Rule 402 states that "a person shall not charge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." The Project would utilize typical construction techniques, and the odors would be typical of most construction sites. As construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. Odors emanating during construction of the Project would not cause injury, detriment, or annoyance to the public; would not endanger the comfort, repose, health, or safety of the public; and would not cause injury or damage to any nearby businesses or properties.

The Project is a housing development that would not include any activities typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners, agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with residences. The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, Project impacts related to odors would be less than significant.

Cumulative Impacts

SCAQMD recommends that construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above (i.e., the regional thresholds and LSTs) also be considered cumulatively considerable.[16] Individual projects that would not generate emissions in excess of SCAQMD's significance thresholds would not contribute considerably to potential cumulative impacts. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance for assessing impacts associated with these emissions. As shown above, the Project's emissions would not exceed SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would be considered less than significant.

16 *SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, August 2003.*

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
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 Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☒	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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 regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The Project Site is located in an urbanized area of the City. The Project Site is improved with a one-story, 69,913-square-foot commercial office building, currently occupied by the Los Angeles County Department of Children and Family Services (DCFS), and surface parking with 347 vehicle parking spaces. The entire Project Site has been previously disturbed and developed with urban uses, and the site does not contain suitable habitat for this species. Additionally, the Torrance General Plan Community Resource Element does not identify any candidate, sensitive, or special status species that occupies the project site. Thus, the Project would not result in the loss or destruction of this species or the degradation of sensitive habitat for this species. The Project Site is landscaped with ornamental grasses, shrubs, and approximately 79 trees. These ornamental trees were planted at the site as part of the landscaping requirements for the existing use and were not planted to serve as biological habitat or habitat for protected species. However, these trees could potentially provide nesting sites for migratory birds. Thus, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Game Code, (FGC) both of which regulate vegetation removal during the nesting season (February 15th to August 15th) to ensure that significant impacts to migratory birds would not occur (refer to Mitigation Measure BIO-1). Compliance with the existing regulations outlined in Mitigation Measure BIO-1 would ensure impacts related to nesting birds would be 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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area of the City. The Project Site is improved with a one-story, 69,913-square-foot commercial office building, currently occupied by the Los Angeles County DCFS, and surface parking with 347 vehicle parking spaces. The Project Site is landscaped with ornamental grasses, shrubs, and trees. No riparian habitat or other sensitive natural community exists at the Project Site or in the immediate vicinity of the site.[17] Thus, the Project would not 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur as a result of the Project.

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17 *California State Geoportal, https://gis.data.ca.gov/datasets/d0b55ff0c29a48b2b615852c40322d5b/explore, accessed January 15, 2023.*

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?

No Impact. The Project Site is located in an urbanized area of the City. The Project Site is improved with a one-story, 69,913-square-foot commercial office building, currently occupied by the Los Angeles County DCFS, and surface parking with 347 vehicle parking spaces. The Project Site is landscaped with ornamental grasses, shrubs, and trees. No wetlands exist at the Project Site or in the immediate vicinity of the site.[18] Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

d) Would the project 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?

Less Than Significant Impact with Mitigation. The Project Site is located in an urbanized area of the City. The Project Site is improved with a one-story, 69,913-square-foot commercial office building, currently occupied by the Los Angeles County DCFS, and surface parking with 347 vehicle parking spaces. The Project Site is landscaped with ornamental grasses, shrubs, and trees. The Project Site is not part of a migratory wildlife corridor or native wildlife nursery. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

The Project Site and the surrounding area are highly developed with urban uses, and no wildlife corridors are on or in proximity to the Project Site. The Project Site does not contain any state or federally protected wetlands that would contain migratory fish or other wildlife species. If migratory birds were to traverse the Project Site, the birds would likely utilize mature vegetation on the Project Site, some of which may potentially provide nesting sites for migratory birds. The Project would remove 79 trees from the Project Site. The tree removal could potentially affect migratory birds. However, the Project is required to comply with the MBTA and the California FGC. Under MBTA and California FGC, it is unlawful to take or possess any migratory nongame bird. Federal Endangered Species Act Section 3(19) defines “take” as to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct”; and California FGC Section 86 defines “take” as to “hunt, pursue, catch, capture, or kill, or attempt to hunt,

18 *USFWS, National Wetlands Inventory, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/, accessed January 15, 2023.*

pursue, catch, capture, or kill." To ensure that the Project complies with MBTA and California FGC, implementation of Mitigation Measure BIO-1 would be required.

Mitigation Measure BIO-1 would ensure that no active nests are present prior to clearing and tree trimming activities and that the Project would be in compliance with MBTA and pertinent sections of the California FGC. With implementation of Mitigation Measure BIO-1, the Project would not interfere with wildlife movement or impede the use of native wildlife nursery sites. Therefore, with implementation of Mitigation Measure BIO-1, Project impacts related to this issue would be less than significant.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The Project Site is not located on or near any significant ecological areas and is not located on or near any street designated as a special area for street trees. The Project would be required to comply with the City's Tree Ordinance (TMC Division 7, Chapter 5), which requires a permit to be obtained prior to cutting, trimming, removing, pruning, planting, injuring, or interfering with any trees on a street.Additionally, the Project would be required to comply with the City's landscape requirements. Thus, the Project would not conflict with any local policies or ordinances protecting biological resources. Therefore, no impacts related to this issue would occr as a result of the Project.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. No portion of the City falls within the boundaries of a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan.[19] Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

Mitigation Measures

To ensure that Project impacts related to nesting birds would be less than significant, the following mitigation measure is required:

BIO-1 Pre-construction surveys shall be constructed for nesting birds if vegetation removal or grading is initiated during the nesting season. A qualified wildlife biologist shall conduct weekly pre-construction bird surveys no more than 30 days prior to initiation of vegetation removal or grading to provide confirmation on the presence or absence of active nests in the vicinity (at

19 *California Department of Fish and Wildlife, Conservation Plan Boundaries, https://apps.wildlife.ca.gov/bios6/?al=ds760, accessed January 15, 2023.*

least 300 to 500 feet around the individual construction site, as access allows). The last survey should be conducted no more than three days prior to the initiation of clearance/construction work. If active nests are encountered, clearing and construction in the vicinity of the nests shall be deferred until the young birds have fledged and there is no evidence of a second attempt at nesting. A minimum buffer of 300 feet (500 feet for raptor nests) or as determined by a qualified biologist shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area. Construction personnel should be instructed on the sensitivity of the area. A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable state and federal regulations protecting birds shall be submitted to the City and County, depending on within which jurisdiction the construction activity is occurring. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

Cumulative Impacts

The 6 related projects listed in Appendix A are located in highly urbanized areas. All of the sites of the related projects are either currently developed or are being developed and are surrounded by development. These sites do not contain any protected species or protected habitat and are not par. As with the Project, any related project that includes the removal of trees is required to comply with the MBTA to ensure that nesting species are protected. As stated previously, no portion of the City falls within the boundaries of a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no cumulative impacts related to biological resources would occur.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. The City of Torrance General Plan Community Resources Element does not list the Project Site as a location that is of historic interest to the City. Additionally, the Project Site is not located within the Olmsted Tract or Torrance Tract, both of which contain contributing structures in the City's Historic Resources Survey. The building on the Project Site and in the surrounding area does not have any unusual characteristics and is not known to be associated with any national, regional, or local figures of significance that would qualify it as a historical resource or of historic significance. Additionally, a review of the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register) shows that neither the Project Site nor any adjacent property is listed as a resource.[20, 21] Additionally, neither the Project Site nor any adjacent property is not listed as a local historic resource.[22] Further, the building located on the Project Site was constructed in 1989 and is not of historical age (i.e., older than 45 years).[23] Thus, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. Therefore, no impacts related to this issue would occur as a result of the Project.

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20 *California Office of Historic Preservation, California Register of Historical Resources, https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19, accessed January 15, 2023.*

21 *National Park Service, National Registerof Historic Places, https://www.nps.gov/subjects/nationalregister/database-research.htm, accessed January 15, 2023*

22 *City of Torrance, Community Development Planning Division, https://www.torranceca.gov/our-city/community-development/planning-division/historic-preservation, accessed January 15, 2023.*

23 *Phase I Environmental Site Assessment, GEOCON, July 2022. Refer to Appendix F.*

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

Less Than Significant With Mitigation Incorporated. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. In January 2023, the South Central Coast Information Center (SCCIC) conducted a records search of all recorded archaeological and built-environment resources as well as a review of cultural resources reports on file for the Project Site and a half-mile radius around the site.[24] In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register, the National Register, and the California State Built Environment Resources Directory (BERD) listings were reviewed for Project Site and a quarter-mile radius of the site. The searches did not identify any known prehistoric or historic resources on the Project Site. However, given that resources are known to exist throughout the Project Site regional, it is possible that unknown archaeological resources could exist at the Project Site, and the potential exists for the inadvertent discovery of archaeological materials during ground-disturbing activities associated with the grading and excavation phases. However, implementation of Mitigation Measure CULT-1 (listed below) would ensure that potential impacts related to unknown archaeological resources would be less than significant.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. No known human remains exist at the Project Site. In the event that unknown human remains were encountered at the site, the Applicant would be required to comply with the State's Health and Safety Code Section 7050.5, which provides that in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native

[24] *South Central Coastal Informaiton Center, Stacy St. James, correspondence, January 27, 2023. Refer to Appendix C.*

American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). Through compliance with existing regulatory standards, Project impacts to human remains would be less than significant.

Mitigation Measures

To ensure that Project impacts related to unknown archaeological resources would be less than significant, the following mitigation measure has been incorporated into the Project:

CULT-1 Prior to issuance of grading permits, a qualified archaeological monitor shall be identified to be on call during ground-disturbing activities. A qualified archaeologist is an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology. If archeological resources are discovered during excavation and/or construction activities, construction shall stop within 50 feet of the find, and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The City of Torrance Community Development Department shall be immediately informed of the discovery and a qualified archaeologist shall be retained by the applicant to determine if the find is classified as a significant historical resource pursuant to CEQA Guidelines Section 15064.5(a) and/or unique archaeological resources (Public Resources Code [PRC] Section 21083.2[g]). Personnel of the project site shall not collect or move any archaeological materials or associated materials. The qualified archaeologist shall be empowered to halt or divert ground disturbing activities. If the resource is classified as a significant cultural resource, the qualified archaeologist shall make recommendations on the treatment and disposition of the find. The final recommendations on the treatment and disposition of the find shall be developed in accordance with all applicable provisions of PRC Section 21083.2 and CEQA Guidelines Sections 15064.5 and 15126.4. The Community Development Department shall review and approve the recommendations prior to implementation. The Community Development Department shall be provided with a final report on the treatment and disposition of the finding prior to issuance of a Certificate of Occupancy. Archaeological resources recovered shall be provided to the South Central Coast Information Center (SCCIC) and the Los Angeles Natural History Museum, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.

Cumulative Impacts

As discussed above, the Project would not result in impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historical resources. Impacts related to

archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. All development that involves ground-disturbing activities is required to implement standard City conditions of approval related to the discovery of archaeological resources, as well as existing state and City regulations related to discovery of human remains. For these reasons, cumulative impacts related to cultural resources would be less than significant.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) Would the project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. Southern California Edison (Edison) provides electricity to the Project Site. The Southern California Gas Company (SoCalGas) provides natural gas to the Project Site. Both forms of energy are provided to the Project Site via existing infrastructure located adjacent to the site. The Project would be served by this infrastructure and would not require the need for new, expanded, or relocated energy infrastructure. Additionally, as discussed in detail below, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. For the reasons discussed below, Project impacts related to energy would be less than significant.

Construction

Electricity Demand

Project construction activities would consume relatively minor quantities of electricity to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structure. This electricity would be supplied to the Project Site by Edison and would be obtained from the existing electrical lines that connect to the Project Site in the roadways adjacent to the site.

Electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary, depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require a limited electricity supply that would not have an adverse impact on available electricity supplies. Therefore,

electricity impacts during construction would be less than significant.

Transportation Energy Demand

As shown in Table VI-1, below, Project construction would consume approximately 125,753 gallons of gasoline and 212,830 gallons of diesel. Project construction is expected to be completed in 2027.

Table VI-1
Summary of Fuel Use During Project Construction[1]

Fuel Type	Quantity
Gasoline	
On-Road Construction Equipment	125,753 gallons
Off-Road Construction Equipment	0 gallons[2]
Total Gasoline	***125,753 gallons***
Diesel	
On-Road Construction Equipment	60,077 gallons
Off-Road Construction Equipment	26,999 gallons
Total Diesel	***87,076 gallons***
Total Petroleum-Based Fuel	**212,830 gallons**

kWh = kilowatt-hours

[1] *Detailed calculations are included in Appendix D.*
[2] *Off-road construction equipment uses diesel fuel.*

Demolition activities are projected to take approximately one month. Heavy-duty construction equipment needed to complete these activities would include diesel-fueled haul trucks, concrete/industrial saw, generator sets, and a rubber-tired dozer. The use of haul trucks with double trailers could be used to increase the overall average capacity per trip, which would minimize the total number of trips and fuel required to transport the debris.

Heavy-duty construction equipment needed during construction of the Project would include a cement and mortar mixer, concrete/industrial saw, generator sets, other material handling equipment, tractor/loader/backhoe, and welders the majority of which would be diesel-fueled. Construction equipment fuels would be provided by local or regional suppliers and vendors.

Transportation fuels, primarily gasoline and diesel would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on EMFAC data compiled by CARB, the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) in 2022 was 23.17 miles per gallon (mpg) for gasoline and 8.30 mpg for

diesel.[25]

Further, while construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and cease upon the completion of construction. Therefore, construction-related impacts on petroleum fuel consumption would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California.

In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began on January 1, 2014, and the compliance schedule requires that the best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets.

Compliance with the above anti-idling and emissions regulations would result in the efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would the use of haul trucks with larger capacities.

Operation

Electricity Demand

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC, lighting, and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table VI-2 the Project would result in approximately 555,041 kWh of net electricity consumption per year.

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25 *CARB, https://arb.ca.gov/emfac/emissions-inventory.*

Table VI-2
Estimated Project Electricity Demand

Land Use	Size	Total (kWh/yr)[1]
Existing		
Office Building	69,913 sf	1,138,271
Parking	347 spaces	153,932
	Total Existing	***1,292,203***
Project		
Multi-family Residential	272 du	997,107
Parking	465 spaces	872,370
	Total Project	***1,847,244***
	Less Existing	*(1,292,203)*
	Net Total	**555,041**

kWh = kilowatt-hours *yr = year* *sf =square feet* *du = dwelling unit*

[1] *Calculated via CalEEMod (refer to Appendix B).*

The Project's operation would not result in an increase in demand for electricity and natural gas that exceeds available supply or distribution infrastructure capabilities. As such, the Project would not require the relocation or construction of any new or expanded electrical power and/or natural gas facilities, the construction of which would cause significant environmental effects. Additionally, The Project would be subject to the latest requirements of the California Building Energy Efficiency Standards, which includes the California Energy Code (California Code of Regulations [CCR] Title 24, Part 6) and the California Green Building Standards Code (CALGreen) (CCR Title 24, Part 11). The California Energy Code contains energy conservation standards applicable to most residential and nonresidential buildings throughout California, such as energy conservation standards for water heating, lighting, electrical power, and mechanical equipment. CALGreen is the state's green building code that applies to the planning, design, operation, construction, use, and occupancy of newly constructed structures in the state. CALGreen requires new buildings to reduce water consumption, employ building commissioning to increase building system efficiencies for large buildings, divert construction waste from landfills, and install low pollutant emitting finish materials. The proposed project does not include any feature that would interfere with implementation of the California Building Energy Efficiency Standards. The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by Edison For these reasons, Project impacts related to energy would be less than significant.

Transportation Energy Demand

The Project Site's location takes advantage of existing transportation alternatives in the

vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. The Project Site's location near transit opportunities including Torrance Transit Lines 7 and 10 would further reduce dependence on automobile travel, reducing the need to own an automobile and consume energy. Additionally, the Project would develop 272 multi-family residential units in close proximity to existing sources of employment and shopping. Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work, shop, and for recreation. As such, the Project would reduce vehicle trips and VMT by encouraging walking, bicycling, and other non-automotive forms of transportation, which would result in corresponding reductions in energy demand.

Transportation fuels (primarily gasoline and diesel) would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Site, would reduce the Project's consumption of gasoline and diesel. CARB's Advanced Clean Cars II regulations were adopted in 2022, imposing the next level of low-emission and zero-emission vehicle standards for model years 2026-2035 that will contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality targets. By 2035 all new passenger cars, trucks, and SUVs sold in California will be zero emissions. The Advanced Clean Cars II regulations take the state's already growing zero-emission vehicle market and robust motor vehicle emission control rules and augments them to meet more aggressive tailpipe emissions standards and ramp up to 100 percent zero-emission vehicles. In support of these regulations, the Project would include 48 EV charging stations. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

Conclusion

As discussed above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Therefore, impacts related to energy would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The Project would comply with the State's Green Building Standards Code, which outlines mandatory and voluntary efficiency measures for non-residential uses. Regulatory compliance with the State's Green Building Standards Code would ensure the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

There are six related projects for consideration in the cumulative impacts analysis, As with the Project, electricity service to all of the related projects is provided by SCE, and natural gas service to all of the related projects is provided by SoCalGas. All of the related projects are located in urbanized areas already developed with electricity and natural gas infrastructure. Each of the related projects would be required to coordinate with SCE and SoCalGas to determine specific energy needs and the ability of the energy providers to accommodate those needs. Additionally, each of the related projects would be required to comply with the State's Green Building Code Standards. Through compliance with existing regulatory conservation measures, the related projects would not result in wasteful, inefficient, or unnecessary consumption of energy. Therefore, cumulative impacts related to energy would be less than significant.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause 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.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit 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?	☐	☐	☐	☒
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The information and analysis provided below is primarily based on the following (refer to Appendix E):

- *Geotechnical Investigation, Geocon West, Inc., revised October 25, 2023.*

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?

No Impact. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or City-designated Fault Hazard Management Zone, and no known faults exist on the Project Site.[26] The closest active fault to the Project Site is the Palos Verdes Fault Zone located approximately 2.2 miles from the Project Site.[27] Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving 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 on the Project Site. Therefore, no impacts related to this issue would occur as a result of the Project.

ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. Given the Project Site's location in a seismically active region, the Project Site could experience seismic groundshaking in the event of an earthquake. The closest active fault to the Project Site is the Palos Verdes Fault Zone, located approximately 2.2 miles from the Project Site. Notwithstanding, the Applicant would be required to design and construct the Project in conformance to the most recently adopted Building Code requirements and applicable recommendations made in the *Geotechnical Investigation* prepared for the Project, dated July 12, 2022, and any updates made in a final geotechnical report. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event. The Project would not exacerbate the existing potential for strong seismic ground shaking. Therefore, Project impacts related to groundshaking would be less than significant.

[26] *Geotechnical Investigation, Geocon West, Inc., July 12, 2022. Refer to Appendix E.*

[27] *Ibid.*

iii) Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. According to the *Geotechnical Investigation* prepared for the Project, the Project Site is not located within the State of California Seismic Hazard Zone mapped liquefaction hazard area.[28] In addition, a review of the City of Torrance Safety Element indicates that the Project Site is not located within an area identified as having a potential for liquefaction. The reported historic high groundwater level is greater than 40 feet beneath the ground surface. Also, the Project Site is underlain by moderately consolidated Pleistocene age older dune sand that is medium dense to dense or stiff to hard and not prone to liquefaction. Based on these considerations, it is the opinion of the preparers of the *Geotechnical Investigation* that the potential for liquefaction and associated ground deformations beneath the Project Site is low. Therefore, Project impacts related to liquefaction would be less than significant.

iv) Landslides caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. The topography of the Project Site and the immediate vicinity is relatively level to gently sloping down to the south-southeast. The site is not located within a City of Torrance Landslide Hazard Zone. According to the City of Torrance General Plan Safety Element, the Project Site is not located within an area identified as a "Hillside Area" or an area identified as having a potential for slope instability. Additionally, the site is not located within an area identified as having a potential for seismic slope instability. There are no known landslides near the Project Site nor is the site in the path of any known or potential landslides. Thus, the potential for slope stability hazards to adversely affect the proposed development is considered low. Therefore, no impacts related to this issue would occur as a result of the Project.

Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impacts related to this issue would occur as a result of the Project.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. During the Project's construction phase, soil would be temporarily exposed. However, The Applicant would be required to comply with the applicable regulations in TMC Division 4, Chapter 10 (Stormwater and Urban Runoff Pollution Control). TMC Section 410.1.040(b) requires the preparation of an SWPPP. Additionally, construction and operation of the Project would be required to comply with applicable regulations in TMC Division 4, Chapter 11 (Low Impact Development Strategies for Development and Redevelopment), which require construction and operations of development and redevelopment projects to comply with the municipal

28 *Ibid.*

NPDES permit, lessen the effects of development to water quality by using smart growth practices, and integrate low impact development design (LID) principles to mimic predevelopment hydrologic patterns through infiltration, evapotranspiration, rainfall harvest, and use. LID is a stormwater management strategy that reduces the amount of impervious area of a completed project site and promotes the use of infiltration and other measures that control runoff.. The site-specific SWPPP would be prepared prior to any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include construction best management practices (BMPs) and erosion control measures to prevent pollution in stormwater discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, stormwater inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities.

Additionally, during the Project's operational phase, all stormwater flows would be directed to BMPs and storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and Project impacts related to soil erosion would be less than significant.

c) Would the project 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?

No Impact. As discussed in response to Checklist Question VII(a)(iii) (Geology and Soils – Liquefaction), the Project Site is not susceptible to liquefaction. As discussed in response to Checklist Question VII(a)(iv) (Geology and Soils – Landslides), the Project Site is not susceptible to on- or off-site landslides. The *Geotechnical Investigation* prepared for the Project (refer to Appendix E) did not identify any issues related to lateral spreading, subsidence, or collapse. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

d) Would the project 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?

No Impact. [According to the *Geotechnical Investigation* prepared for the Project (refer to Appendix E), soils at the Project Site have a "very low" expansive potential and are classified as "non-expansive." Thus, the Project would not 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. Therefore, no Project impacts related to this issue would occur as a result of the Project.

e) Would the project 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?

No Impact. The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur as a result of the Project.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation Incorporated. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. The site does not contain any unique geological features. A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood for unique paleontological resources to occur at the Project Site (refer to Appendix E). The records search revealed that no paleontological resources are known to exist at the Project Site, but resources are known to exist in the Project Site area in the same sedimentary deposits found at the Project Site.[29] It is possible that unknown paleontological resources could be encountered during the Project's grading and excavation phases. However, the Project would be required to implement Mitigation Measure GEO-1 listed below that would ensure Project impacts on unknown paleontological resources would be less than significant.

Mitigation Measures

To ensure that Project impacts related to unknown paleontological resources would be less than significant, the following mitigation measure is required:

GEO-1: In the event paleontological resources are encountered during construction, the City of Torrance Community Development Department shall be immediately informed of the discovery. All work shall cease in the area of the find and a qualified paleontologist shall be retained by the applicant to evaluate the find before restarting work in the area. The City shall require that all paleontological resources identified on the Project Site be assessed and treated in a manner determined by the qualified paleontologist. The

[29] *Natural History Museum, Los Angeles County, Alyssa Bell, Ph. D., correspondence, February 6, 2023. Refer to Appendix E.*

paleontologist shall be empowered to halt or divert ground-disturbing activities. A qualified paleontologist is a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for Qualified Professional Paleontologist, which is defined as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California (preferably southern California), and who has worked as a paleontological mitigation Project supervisor for a least one year.

Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the paleontologist shall have the authority to temporarily direct, divert, or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any significant paleontological resources found during construction monitoring shall be prepared, identified, analyzed, and permanently curated in an approved regional museum repository under the oversight of the qualified paleontologist. 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. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Project paleontologist. Work in the area of the discovery shall resume once the find is properly documented and the qualified paleontologist authorizes resumption of construction work.

Cumulative Impacts

Geology and soils impacts are site specific. The impacts at each development site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other development sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Therefore, cumulative geology and soils impacts would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The information and analysis presented below is based primarily on the following (refer to Appendix B):

- *Air Quality and GHG Emissions Techincal Data, NTEC, July 2023.*

Environmental Setting

Climate Change Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in the average temperature of the Earth's surface and atmosphere. One identified cause of global warming is an increase in GHG emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

GHG Emissions Background

GHG emissions include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and

nitrogen trifluoride (NF_3).[30] CO_2 is the most abundant GHG. Other GHG emissions are less abundant but have greater global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

Regulatory Framework

There are any number of agreements, strategies, policies, regulations, and standards that relate to GHG emissions – from international climate accords to local climate action plans. Below is a discussion of the plans, policies, and regulations that are fundamental to the Project's determination of significance with respect to its GHG emissions and consistency with these documents.

State

The State legislature, executive office, and administrative agencies have promulgated several rules that govern GHG emissions. Below is a timeline thereof, followed by explanations of each:

- June 2005: Executive Order S-3-05 (EO S-3-05)
- September 2005: Assembly Bill 32 (AB 32) (codified EO S-3-05)
- August 2007: Senate Bill 97 (SB 97)
- September 2008: Senate Bill 375 (SB 375)
- December 2008: CARB adopts Climate Change Scoping Plan (the "AB 32 Scoping Plan")
- August 2011: CARB adopts Supplemental Functional Equivalent Document to the Climate Change Scoping Plan (the "Supplemental FED")
- May 2014: CARB adopts First Update to the Climate Change Scoping Plan: Building on the Framework (the "First Update")
- April 2015: Executive Order B-30-15 (EO B-30-15)
- September 2016: Senate Bill 32 (SB 32) (codified EO B-30-15)
- November 2017: CARB adopts the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (the "2017 Scoping Plan")
- September 2018: Executive Order B-55-18 (EO B-55-18)
- September 2022: Assembly Bill 1297 (AB 1297) (codified EO B-55-18)
- November 2022: CARB adopts the 2022 Scoping Plan for Achieving Carbon Neutrality (the "2022 Scoping Plan")

30 *As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.*

Other regulations would also have an indirect effect on the Project's GHG emissions. The Project's relation to the following regulations would not be determinative of its CEQA significance. Nevertheless, explanations of these regulations are also provided below for informational purposes:

- SB 350, the Clean Energy and Efficiency Act of 2015
- Cap-and-Trade Program

EO S-3-05

In June 2005, Governor Arnold Schwarzenegger signed EO-S-3-05, which had the goal of reducing the State's GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

AB 32

In September 2005, Governor Schwarzenegger signed the California Global Warming Solutions Act of 2006, AB 32, into law. AB 32 committed the State to achieving the following:

- By 2010, reduce statewide GHG emissions to 2000 levels.[31]
- By 2020, reduce statewide GHG emissions to 1990 levels.

AB 32 required the California Air Resources Board (CARB) to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions. The State achieved its 2020 GHG emissions target of returning to 1990 levels four years earlier than mandated by AB 32.

SB 97

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (the "Guidelines Amendments") were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project's effect on the environment, as pursuant to CEQA.

The Guidelines Amendments do not provide thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or

31 *The 2010 target to reduce GHG emissions to 2000 levels was not met.*

methodology to use, or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified:

(1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for the cumulative impact analysis."[32]

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document requirement by CEQA.

SB 375

In September 2008, Governor Schwarzenegger signed SB 375, the Sustainable Communities and Climate Protection Act of 2008, to align regional planning for housing and transportation with the GHG reduction goals outlined by AB 32. SB 375 requires each Metropolitan Planning Organization (MPO) to adopt a Sustainable Community Strategy (SCS) encouraging compact development that reduces passenger vehicle miles traveled (VMT) and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

EO-B-30-15

In April 2015, Governor Brown promulgated EO B-30-15, which had the goal of reducing the State's GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

SB 32

Signed in September 2016 by Governor Jerry Brown, SB 32 updated AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

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32 *Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.*

New goals outlined in SB 32 update AB 32's scoping plan requirement and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

EO B-55-18

On September 10, 2018, Governor Jerry Brown issued EO B-55-18, which established a target for California to achieve carbon net neutrality by 2045. EO B-55-18 identifies the statewide goal to achieve and maintain carbon neutrality as soon as possible, and no later than 2045.

AB 1297

Governor Gavin Newsom codified the goals outlined in EO-B-55-18 in September 2022 when he signed AB 1279. It requires the state to reduce statewide anthropogenic GHG emissions to at least 85 percent below 1990 levels and to maintain net negative GHG emissions thereafter. AB 1279 tasks CARB with monitoring and regulating GHG emissions to achieve this goal.

SB 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable resources from 33 percent to 50 percent by 2030, and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[33]

Cap-and-Trade Program

The Scoping Plans identify the Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHGs. CARB designed and adopted the California Cap-and-Trade Project pursuant to its authority under AB 32.

Climate Change Scoping Plan

AB 32 Scoping Plan

In 2008, CARB approved a Climate Change Scoping Plan (the "AB 32 Scoping Plan") detailing the approach that California would take to reduce its GHG emissions to 1990 levels by 2020, as required by AB 32. To achieve this, CARB determined that an approximate 28.5 percent reduction in GHG emissions would be necessary. That is,

33 *Senate Bill 350 (2015-2016 Re. Session) Stats 2015, ch. 547.*

projected 2020 GHG emissions (i.e., emissions that would occur in 2020, absent any GHG-reducing laws and regulations) would have to be reduced by 28.5 percent.

Supplemental FED

Shortly after the adoption of the 2008 Scoping Plan, a lawsuit was filed challenging CARB's approval of the Climate Change Scoping Plan Functional Equivalent Document. In May 2011, it was found that the environmental analysis of this document's alternatives was not sufficient under CEQA. In response to this ruling, CARB prepared a revised and expanded document, the Supplemental FED, approved in August 2011.

As part of the Supplemental FED, CARB updated the projected 2020 emissions inventory based on then-current economic forecasts (i.e., as influenced by the economic downturn) and GHG emissions reduction measures already in place.[34] Ultimately, CARB determined that achieving the 1990 emissions levels by 2020 would require a reduction in GHG emissions of 16 percent from business-as-usual (BAU) conditions, down from the previous 28.5 percent figure.

First Update

CARB adopted the First Update in 2014, which found that California was on track to meet AB 32's 2020 emissions reduction mandate and determined that, by 2030, the state could reduce its GHG emissions to levels on course with those needed to achieve the 2050 target if the state realized the expected benefits of its existing policy goals.[35] CARB further identified and developed recommended actions for six focus areas key to achieving the 2050 target: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. As noted earlier, the state achieved its 2020 target that was established by AB 32.

2017 Scoping Plan

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted an update, the 2017 Scoping Plan. It built upon the successful framework established by the AB 32 Scoping Plan and the First Update and identified new, technologically feasible, and cost-effective strategies to ensure that the state meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. It includes policies to require direct GHG emissions reductions at some of the state's largest stationary sources and mobile sources, such as the use of lower GHG fuels,

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34 *E.g., the million-solar-roofs program, Assembly Bill 1493 (Pavley I) motor vehicle GHG emissions standards, and the Low Carbon Fuel Standard (LCFS). Pavley I, the first GHG standard in the nation for passenger vehicles, took effect for model years starting in 2009 to 2016 and was therefore in place at the time of the 2011 Supplemental FED.*

35 *The 2050 goal of reducing GHG emissions to 80 percent below 1990 levels was originally established by Executive Order S-3-05, issued by Governor Schwarzenegger in June 2005. However, the 2050 goal was not codified by either AB 32 or SB 32.*

efficiency regulations, and the cap-and-trade program (the "Cap-and-Trade Program"), or carbon tax, which constrains and reduces emissions at covered sources.

CARB's 2030 emissions projections for the state take into account 2020 GHG reduction policies and programs, including the following:

- Addressing GHG emissions from natural and working lands of California, which include the agriculture and forestry sectors.
- Continuation of the Cap-and-Trade Program, which is expected to cover most of the 2030 reduction obligation, or approximately 34 to 79 million metric tons of CO_2 equivalent ($MMTCO_2e$).
- The state's short-lived climate pollutants strategy, which addresses GHG emissions that remain in the atmosphere for shorter periods of time than longer-lived GHGs like CO_2, is expected to cover approximately 17 to 35 $MMTCO_2e$.
- The Renewables Portfolio Standard (RPS) with its goal of 50 percent renewable electricity by 2030 is expected to cover approximately 3 $MMTCO_2e$.
- The mobile source strategy and sustainable freight action plan are expected to cover approximately 11 to 13 $MMTCO_2e$.
- Doubling the energy efficiency savings in natural gas and electricity end uses by 2030 that is expected to cover approximately 7 to 9 $MMTCO_2e$ of the 2030 reduction obligation.
- Other strategies would be expected to cover the remaining 2030 reduction obligations.

The 2017 Scoping Plan also addresses the role of local governments in meeting the state's GHG reduction goals, because local governments have jurisdiction and land use authority related to community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures. For individual projects under CEQA, the 2017 Scoping Plan states that local governments can support climate action when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the Scoping Plan, the state's long-term goals, and climate change science. However, the City of Torrance has not developed such thresholds for CEQA use.

2022 Scoping Plan

The 2022 Scoping Plan establishes a scenario by which the State may achieve carbon neutrality by 2045 or earlier, and it outlines a technologically feasible, cost-effective, and equity-focused path for achieving this climate target. The 2022 Scoping Plan addresses the latest climate-related legislation and direction from current Governor Gavin Newsom,

who, by his signing of AB 1279, required the State to reduce statewide anthropogenic GHG emissions to at least 85 percent below 1990 levels by 2045 and to maintain net negative GHG emissions thereafter. The 2022 Scoping Plan relies on the aggressive reduction of fossil fuels in all statewide sectors and accelerating existing carbon reduction programs. Aspects of the 2022 Scoping Plan's scenario include:

- Rapidly moving to zero-emission transportation by electrifying cars, buses, trains, and trucks.
- Phasing out the use of fossil gas used for heating homes and buildings.
- Clamping down on chemicals, refrigerants, and other high global warming potential gases.
- Providing communities with sustainable options for walking, biking, and public transit to reduce reliance on cars.
- Continuing to develop solar arrays, wind turbine capacity, and other resources that provide clean, renewable energy.
- Scale-up options such as renewable hydrogen and biomethane for end uses that are hard to electrify.

CARB estimates that successfully achieving the outcomes called for by the 2022 Scoping Plan will reduce demand for liquid petroleum by 94 percent and total fossil fuel by 86 percent in 2045, relative to 2022. The 2022 Scoping Plan also emphasizes the role of natural and working lands and carbon-capturing technologies to address residual emissions and achieve net negative emissions.

Regional

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008 Governor Arnold Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and transportation with the GHG emissions reduction goals outlined by AB 32. SB 375 requires each MPO to adopt an SCS encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. SCAG is also a co-producer, with the South Coast Air Quality Management District (SCAQMD), of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG emissions reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region.

The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's Priority Growth Areas (PGAs) and aims to enhance and build out the region's transit network. PGA's such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for just four percent of total land in the SCAG region, but they are projected to accommodate 64 percent of the region's future household growth and 74 percent of the region's future employment growth by 2045.[36] According to the 2020-2045 RTP/SCS, dense infill development in PGAs can help reduce travel distances, increase mobility options, and improve access to workplaces and other destinations, reducing vehicle miles traveled (VMT) and, crucially, associated GHG emissions.

The SB 375 GHG reduction targets for the SCAG region correspond with reductions in regional VMT per capita. OPR has recommended that achieving 15 percent lower per capita (residential) or per employee (commercial) VMT than existing development is generally feasible and is supported by evidence that connects these reductions to the state's emissions goals.

SCAQMD CEQA Guidance

The City] is located in the South Coast Air Basin (Basin). The SCAQMD is responsible for air quality planning in the Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.[37] A GHG Significance Threshold Working Group (the "Working Group") was formed to further evaluate potential GHG significance thresholds.[38] The SCAQMD

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36 *SCAG, Final 2020-2045 RTP/SCS, September 2020.*

37 *SCAQMD, Board Meeting, December 5, 2008. Agenda No. 31, http://www3.aqmd.gov/hb/2008/081231.a.thm. Accessed July 23, 2023.*

38 *SCAQMD, Greenhouse Gases CEQA Significance Thresholds, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed July 23, 2023.*

proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MTCO2e per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO2e per year would be assumed to have a less-than-significant impact on climate change.

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO2e per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance thresholds for other jurisdictions.

Local

City of Torrance Climate Action Plan

In December 2017 the City adopted a Climate Action Plan (CAP) to quantify the City's GHG emissions, identify community-wide strategies to lower the City's GHG emissions, and develop an implementation plan for these strategies. The CAP is not CEQA-qualified under the requirements of CEQA Guidelines Section 15183.5 but nevertheless identifies how the City may reduce its GHG emissions in line with the State's AB 32 targets. The CAP determines that implementation of five source strategies – Land Use and Transportation, Energy Efficiency, Solid Waste, Urban Greening, and Energy Generation and Storage – would reduce the City's GHG emissions to 49 percent below 2005 levels by 2035 and put the City "on a path" towards reducing emissions 80 percent below 1990 levels by 2050. The CAP includes a long list of goals, measures, and sub-strategies under each of the five source strategies, most of which apply to the City and not to private land use development projects such as the Project.

City of Torrance 2009 General Plan

The City addresses climate change in the Community Resources Element of its General Plan.[39] The following objectives and policies are relevant to climate change and the Project:

Objective R-3:	To contribute to the improvement of local and regional ambient air quality to benefit the health of all.
Policy CR.13.2:	Work with neighboring cities to implement local and regional projects that improve mobility on freeways and railways, reduce emissions, and improve air quality.

39 *City of Torrance, 2009 General Plan, April 2010.*

Policy CR.13.3: Support regional air quality goals through conscientious land use and transportation planning and the implementation of resource conservation measures.

Policy CR.13.5: Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling.

Policy CR.13.7: Encourage the use of alternative fuel vehicles and re-refined oil.

Policy CR.13.8: Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality.

Objective CR.14: To reduce the City's overall carbon footprint and counteract the effects of global warming through a reduction in the emissions of greenhouse gases within Torrance.

Policy CR.14.1: Support the California Air Resources Board in its ongoing plans to implement AB 32, and fully follow any new AB 32-related regulations.

Policy CR.14.2: Develop and implement greenhouse gas emissions reduction measures, including discrete, early-action greenhouse gas-reducing measures that are technologically feasible and cost-effective.

Policy CR.14.3: Pursue actions recommended in the U.S. Mayors Climate Protection Agreement to meet AB 32 requirements.

Policy CR.14.4: Act as leader and example in sustainability and reduction in greenhouse gas emissions by conducting City business in the most greenhouse gas-sensitive way.

Existing Conditions

Existing Statewide GHG Emissions

CARB reports that in 2019, emissions from GHG emissions statewide were 404 $MMTCO_2e$, 27 $MMTCO_2e$ below the state's 2020 GHG limit of 431 $MMTCO_2e$. The transportation sector was the largest source of GHG emissions, accounting for approximately half of the state's GHG inventory when including upstream transportation emissions from the refinery and oil and gas industrial sectors. The commercial and residential sectors accounted for approximately 10 percent of GHG emissions. Agriculture accounted for approximately 8 percent, and electricity generation accounted for approximately 20 percent. The remaining emissions came from sectors such as non-

transportation fuel-related industrial sources, recycling and waste management, and from high global warming potential gases.

In 2021, approximately 52 percent of electricity generation serving California came from renewable and zero-carbon resources (e.g., solar and wind).

Existing Project Site Emissions

The Project Site is currently improved with a one-story, 63,875-square-foot commercial office building, currently occupied by the Los Angeles County Department of Children and Family Services. The Project Site also includes a surface parking lot containing 347 vehicle parking spaces in support of this use. It is estimated that these existing uses generate approximately 1,694 $MTCO_2e$ of GHG emissions annually.

Project Impacts

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Would the project conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact*.* Whether the Project would generate GHG emissions that could have a significant impact on the environment is based on whether the Project would conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions. As such, both of these Checklist Questions are addressed together.

Methodology

To analyze the Project's GHG emissions impacts, the City uses a qualitative analysis to assess the Project's consistency with the following plans, policies, and regulations adopted to reduce GHG emissions:

- EO S-3-05 and AB 32
- AB 32 Scoping Plan and First Update
- EO B-30-15, SB 32, and the 2017 Scoping Plan
- EO B-55-18, AB 1279, and the 2022 Scoping Plan
- SCAG's 2020-2045 RTP/SCS
- City of Torrance Climate Action Plan
- City of Torrance General Plan

Additionally, to comply with the requirements of CEQA Guidelines, Section 15064.4(a), the analysis includes a good faith estimate of GHG emissions that may result from the Project.

Neither the City nor SCAQMD has adopted GHG significance thresholds for land use development projects such as the Project, although SCAQMD has adopted significance thresholds for industrial-type projects for which it is the lead agency. The SCAQMD industrial thresholds are not relevant to the Project, as the only projects for which the SCAQMD serves as the lead agency are those that involve the adoption of air quality rules or regulations, or projects that have not gone through CEQA environmental review via another lead agency. However, the City is the lead agency for this project. The City has not adopted thresholds for land use development projects based on SCAQMD guidance for these types of projects, and the City has the discretion to adopt a significance threshold relevant to the Project.

Center for Biological Diversity et al. vs. California Department of Fish and Wildlife

On November 30, 2015, the California Supreme Court issued an opinion on significance thresholds under CEQA for the evaluation of impacts associated with GHGs in the case *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife* (*Center for Biological Diversity*).[40] The following discussion summarizes the relevant facts and holdings of that case, which assessed the use of qualitative GHG significance thresholds (i.e., those concerning consistency with applicable plans, programs, and policies) and quantitative GHG significance thresholds (i.e., numerical thresholds).

The court acknowledged that California air pollution control officials and air quality districts have made several proposals for numerical thresholds. Multiple agencies' efforts at framing GHG significance issues have not yet coalesced into any widely accepted set of numerical thresholds, but they have produced a certain level of consensus on the value of AB 32 consistency as a criterion. Neither AB 32 nor the CARB Scoping Plan related thereto set out a mandate or method for CEQA analysis of GHG emissions from a proposed project. An amendment to CEQA adopted in 2007, however, required the preparation, adoption, and periodic update of guidelines for mitigation of GHG emissions impacts. The resulting direction from the state was that a lead agency should attempt to describe, calculate, or estimate the amount of GHG emissions that a project may emit, but recognized that agencies have discretion in how to do so. CEQA Guideline 15064.4 further provides that when assessing the significance of GHG emissions, the agency should consider these factors (among others): (1) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the

40 *Ctr. for Biological Diversity v. Dep't of Fish & Wildlife, 62 Cal. 4th 204 (2015), as modified on denial of reh'g (Feb. 17, 2016).*

relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The court also acknowledged that the scope of global climate change and the fact that GHG emissions, once released into the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are global rather than local. For many air pollutants, the significance of their environmental impact may depend greatly on where they are emitted; for GHG emissions, it does not. As such, GHG concerns are not necessarily locational; they are whether a particular project, which will accommodate California's housing and/or economic development needs, is sustainable. A significance criterion framed in terms of efficiency and conservation in land use (as compared to a business-as-usual [BAU] pattern of growth) is superior to a simple numerical threshold because CEQA is not intended as a population control measure.

Furthermore, the court stated that this consideration favors consistency with AB 32's statewide goals as a permissible significance criterion for project GHG emissions. Meeting statewide reduction goals does not preclude all new development. Rather, the AB 32 Scoping Plan – which is the state's roadmap for meeting AB 32's GHG reduction target – assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians. To the extent a project incorporates efficiency and conservation measures sufficient to contribute its portion of the overall GHG reductions necessary for the entire state, one can reasonably argue that its impact is not cumulatively considerable, because it would be helping to solve the cumulative problem of GHG emissions as envisioned by California law. Given the reality of growth, some GHG emissions from new housing and commercial developments are inevitable. The critical CEQA question is the cumulative significance of a project's GHG emissions, and, as discussed previously, from a climate change perspective it does not matter where in the state those emissions are produced. Under these circumstances, evaluating the significance of a project's GHG emissions with respect to their effect on the state's efforts to meet its long-term goals is a reasonable threshold. Accordingly, a significance threshold based on a project's consistency with plans aimed at reducing GHG emissions is permitted under CEQA.

The Supreme Court in *Center for Biological Diversity* recognized potential options for analyzing the cumulative significance of a project's GHG emissions, including the following:

- A BAU comparison based on the Scoping Plan methodology if supported by substantial evidence that the chosen metric supports the level of reduction from BAU a new land use development at the proposed location must contribute.

- Consistency with AB 32 in whole or in part by assessing compliance with regulatory programs designed to reduce GHG emissions, provided the project complies with or exceeds the regulations that were adopted by CARB or state agencies to comply with the Scoping Plan, and provided the significance analysis only relates to impacts within the area governed by the regulation, and/or showing consistency with local GHG reduction plans to provide a basis for the tiering or streamlining of project-level CEQA analysis, including as consistent with CEQA Guidelines Section 15183.3; and

- Relying on numerical thresholds for significance for GHG emissions.

CEQA Guidelines Section 15064.4

In 2019, CEQA Guidelines Section 15064.4 was amended to incorporate the holding in the *Center for Biological Diversity* case as well as others. The section now directs lead agencies as follows:

> ***§15064.4. Determining the Significance of Impacts from Greenhouse Gas Emissions.***
>
> *(a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:*
>
> *(1) Quantify greenhouse gas emissions resulting from a project; and/or*
>
> *(2) Rely on a qualitative analysis or performance-based standards.*
>
> *(b) In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. A lead agency should consider the following factors, among others, when determining the significance of impacts from greenhouse gas emissions on the environment:*
>
> *(1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;*

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see e.g., section 15183.5(b)). Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. In determining the significance of impacts, the lead agency may consider a project's consistency with the state's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

(c) *A lead agency may use a model or methodology to estimate greenhouse gas emissions resulting from a project. The lead agency has the discretion to select the model or methodology it considers most appropriate to enable decision-makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.*

Project GHG Emissions Analysis

Based on the above legal standards, the City finds that analyzing the Project's GHG emissions through consistency with the plans, policies, and regulations identified above that have been adopted to reduce GHG emissions is the appropriate methodology to analyze the Project's GHG emissions impacts.

Using consistency with AB 32's statewide goal for GHG emissions reduction, and subsequently adopted plans, programs, policies, standards, and regulations as identified above, rather than a numerical threshold, as a significance criterion is also consistent with the broad guidance provided by Section 15064.4 of the CEQA Guidelines to reflect that there is no iron-clad definition of significance pertaining to this matter. Section 15064.4 was not intended to restrict agency discretion in choosing a method for assessing GHG emissions, but rather to assist lead agencies in investigating and disclosing all that they reasonably can regarding a project's GHG emissions impact.

The basis for this analysis' estimate of the Project's GHG emissions is as follows: As stated above, CEQA Guidelines Section 15064.4(a) establishes that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to

describe and estimate the amount of greenhouse gas emissions resulting from a project. CEQA Guidelines Section 15064.4(c) states a lead agency may use a model or methodology to estimate greenhouse gas emissions resulting from a project and that the lead agency has the discretion to select the model or methodology it considers most appropriate to enable decision-makers to intelligently take into account a project's incremental contribution to climate change.

Based on this guidance, GHG emissions associated with the Project's construction and operations were estimated using the California Emissions Estimator Model 2022.1.1.14 (CalEEMod). Construction emissions are those that would result from the construction of the Project. Operations emissions include those related to both direct and indirect sources such as mobile sources, water use, solid waste, area sources, natural gas, and electricity use. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects in California. The City is not required to use a numerical GHG threshold or another methodology that relies on quantitative analysis. As such, the Project's GHG emissions have been estimated and disclosed to comply with CEQA Guidelines Section 15064.4(a) and to provide evidence that the implementation of the plans, policies, and regulations adopted to reduce GHG emissions will result in actual GHG emissions reduction.

Consistency with Applicable Plans and Policies

The discussion below assesses the extent to which the Project would be consistent with the following relevant plans, policies, and regulations adopted for the purpose of reducing GHG emissions:

- EO S-3-05, AB 32, AB 32 Scoping Plan and First Update (the "AB 32 et. al. Regulations");
- EO B-30-15, SB 32, and the 2017 Scoping Plan (the "2017 Scoping Plan et. al. Regulations");
- EO B-55-18, AB 1279, and the 2022 Scoping Plan (the "2022 Scoping Plan et. al. Regulations");
- SCAG's 2020-2045 RTP/SCS;
- City of Torrance Climate Action Plan
- City of Torrance General Plan

With respect to the three Executive Orders listed above, the legislation that was codified in response to those orders (e.g., AB 32, SB 32, and AB 1279, respectively), CARB's Scoping Plans provide strategies and programs aimed at achieving their corresponding GHG emissions reduction goals. For example, the 2017 Scoping Plan states that it "establishes a path that will get California to its 2030 target" and "identifies how the State can reach our 2030 climate target to reduce…GHG emissions by 40 percent from 1990 levels." Similarly, CARB's First Update provides that it "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050." The 2022 Scoping Plan establishes that its "Scoping Plan Scenario achieves the AB 1279 target of 85 percent below 1990 levels by 2045." Many of the emissions reduction strategies CARB recommended would reduce the Project's GHG emissions to the extent required by applicable legislation. An overview of mandatory regulatory measures contained within CARB's Scoping Plans and the effect that they would have on the Project's GHG emissions are included in Table VIII-1.

EO S-03-05, AB 32, AB 32 Scoping Plan, and First Update

AB 32 adopted and codified EO S-3-05's goal of reducing GHG emissions to 1990 levels by 2020. As noted previously, California achieved this target four years earlier than mandated. The AB 32 Scoping Plan and 2014 First Update provided the basis for policies that helped California achieve this target by 2020, as well as for policies that will help California continue its GHG emissions reductions beyond 2020. Thus, it follows that if the Project would be consistent with the AB 32 Scoping Plan and the First Update, then the Project would be consistent with state efforts to maintain its achievement of the 2020 target established by EO S-3-05 and codified by AB 32.

Table VIII-1 contains an overview of applicable reduction actions/strategies (categorized by emissions source type) that are outlined in the AB 32 Scoping Plan and its later iterations. The overview provides context surrounding various measures that would indirectly reduce the Project's GHG emissions via their current, future, or continued implementation.

Table VIII-2 provides a more specific evaluation of the Project's consistency with applicable strategies of the AB 32 Scoping Plan and First Update. Based on this evaluation, the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan and First Update. Therefore, the Project would be consistent with State efforts to maintain achievement of the 2020 target that was established by Executive Order S-3-05 and codified by AB 32.

Table VIII-1
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
Energy
RPS Program and SB 2X: The California RPS program (Updated under Senate Bill 2X) required both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020, 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also required 50 percent renewables by 2030.[A] Southern California Edison (Edison) reports that as of 2020 it has achieved 34 percent renewables.[B] The CalEEMod default carbon intensity for electricity generated by Edison is based on utility-provided data from 2021, so it presumably takes into account Edison's 34 percent renewables mix for 2020.[C] However, with the recent passage of SB 100, EDISON (along with other electric utilities) is requires to increase its energy portfolio to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. The Project would comply with these percentage renewables requirements as the Project is served by EDISON, which is tasked with achieving these GHG reduction mandates. The Project's electricity GHG emissions in this analysis do not account for these rapidly changing and escalating renewables requirements. By the Project buildout year of 2027, it is reasonable to assume that EDISON may supply over 50 percent to consumers, in line with SB 100's requirements. As such, GHG emissions from the Project's electricity use would likely be lower than what is identified in this analysis. **SB 350:** As required under SB 350, a doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, the California Energy Code, and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.
Cap-and-Trade Program: As required by AB 32 and the AB 32 Scoping Plan, the Cap-and-Trade Program regulates GHG emissions associated with electricity demand, though the program applies to electricity service providers and not directly to development projects. The Project's electricity consumption would benefit from GHG reductions associated with this Statewide program. The Cap-and-Trade program also covers GHG emissions from the combustion of transportation fuels.
Mobile
Advanced Clean Cars Program: CARB's Advanced Clean Cars Program regulates GHG emissions for model years 2017 through 2025 and increases the share of zero-emission vehicles manufactured in model years 2018 through 2025. Standards under the Advanced Clean Cars Program apply to all passenger and light-duty trucks sold within California. Mobile source GHG emissions in this analysis do not include the additional 34 percent reductions in mobile source emissions attributable to this program as the CalEEMod model does not account for it. Other mobile source strategies are related to CARB's development of the Innovative Clean Transit and Advanced Clean Trucks programs. The Innovative Clean Transit regulation, adopted in December 2018, requires all public agencies to gradually transition to 100-percent zero-emission

Table VIII-1
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
bus fleets, in part by mandating that all new bus purchases are zero-emission starting in 2029. Adopted in March 2021, the Advanced Clean Trucks regulation sets increased sales requirements for zero-emission trucks from 2024 to 2035 and contains company and fleet reporting requirements for large employers and fleet owners. The Project would indirectly benefit from both of these measures. Additionally in September 2020, Governor Gavin Newsom issued Executive Order N-79-20, which directs CARB to develop and propose: • Passenger vehicle and truck regulations that would require increasing volumes of new zero-emission vehicles to be sold in the State, including a target of 100 percent of in-state sales by 2035. • Medium- and heavy-duty vehicle regulations that would require increasing volumes of new zero-emission trucks and buses sold and operated in the State. This includes a target that 100 percent of the in-state fleet be zero-emission by 2045, as feasible, and that 100 percent of drayage trucks be zero-emission by 2035. • Strategies to achieve 100 percent zero-emissions from off-road vehicles and equipment operations in the State by 2035. The Project would indirectly benefit from this order over time as these goals are realized. Regulations pursuant to this goal would be issued by CARB as part of its Zero-Emission Vehicle (ZEV) program, which is itself part of the Advanced Clean Cars Program. **Low Carbon Fuel Standard (LCFS):** The LCFS reduced the carbon intensity of California's transportation fuels by at least 7.5 percent by 2020. The CalEEMod model assumes that the LCFS reduces mobile source emissions accordingly. The 2018 updates to the LCFS target a 20 percent reduction in carbon intensity by 2030. CalEEMod does not take into account these updates to the LCFS. The Project's GHG emissions would benefit from this regulatory program over time.
Solid Waste
California Integrated Waste Management Act of 1989: This regulation required jurisdictions to reduce solid waste by 50 percent by 2000. In 2011, AB 341 amended this regulation to provide a goal of reducing solid waste generation by 75 percent by 2020, and annually thereafter. The Project would contract for waste disposal services from a provider that must meet AB 341 mandates for diversion. The CalEEMod model conservatively assumes a zero percent diversion rate; as a result, GHG emissions from the Project's solid- waste generation are conservative and would be lower.
[A] *SB 350 (2015-2016 Regular Session) Stats 2015, Ch. 547.* [B] *California Public Utilities Commission (CPUC), 2021 California Renewables Portfolio Standard Annual Report, November 2021.* [C] *CalEEMod 2022, Appendix G.*

Table VIII-2
Consistency with the AB 32 Scoping Plan
and First Update GHG Emissions Reduction Strategies

Strategy/Recommended Action	Project Consistency
California Cap-and-Trade Program: Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.	**Not Applicable.** This recommended action called upon the State to develop a cap-and-trade program, which has been implemented. Though the Project would not be relevant to this action, as discussed, the Project would benefit from GHG reductions associated with the State's Cap-and-Trade Program because the program applies to electricity usage and transportation fuels.
California Light-Duty Vehicle Greenhouse Gas Standards: Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Not Applicable.** This recommended action called upon the State to develop and implement light-duty vehicle standards related to GHG emissions. The development of these standards is not relevant to the Project. However, as discussed, the Project would benefit from previous, existing, and future standards related to this action (i.e., Advanced Clean Cars Program) that are intended to help the State achieve and/or exceed the AB 32 GHG emissions reduction target.
Energy Efficiency: Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly-owned utilities).	**Consistent.** The Project would be designed to meet the CALGreen building standards that are in effect at the time of its permitting. The latest standards achieve increased energy and construction efficiencies as compared to previous CALGreen standards that were in place at the time of the AB 32 Scoping Plan and First Update. The Project would be in conformance with the current or next-generation CALGreen standards that are intended to help the State achieve and/or exceed the AB 32 GHG emissions reduction target.
Renewables Portfolio Standard: Achieve 33 percent renewable energy mix statewide by 2020.	**Consistent.** As noted earlier, EDISON reports that it achieved a 34-percent renewables mix by 2020. As EDISON would provide electricity service to the Project, the Project would use electricity that is consistent with this recommended action. As also noted, EDISON is tasked with achieving the latest SB 100 and SB 350 renewables mandates, which go beyond the 33 percent by 2020 target identified in this recommended action. As a result, the Project would utilize electricity that goes beyond this action's target that was intended to help the State achieve its AB 32 GHG emissions reduction goal for 2020.
Low Carbon Fuel Standard: Develop and adopt the Low Carbon Fuel Standard.	**Not Applicable.** This recommended action called upon the State to develop and implement the LCFS. The LCFS originally went into effect in April

Table VIII-2
Consistency with the AB 32 Scoping Plan
and First Update GHG Emissions Reduction Strategies

Strategy/Recommended Action	Project Consistency
	2010. As discussed earlier, the latest LCFS update targets a 20 percent reduction in carbon intensity by 2030, which goes beyond the reduction that the AB 32 Scoping Plan had targeted for 2020. Thus, Project-related vehicles that use fuels subject to the LCFS would achieve GHG emissions reductions that go beyond the target that was intended to help the State achieve its AB 32 GHG emissions reduction goal for 2020.
Regional Transportation-Related Greenhouse Gas Targets: Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	**Not Applicable.** This recommended action called upon the State to develop regional greenhouse gas emissions reduction targets for passenger vehicles via SB 375. To be discussed in greater detail below, the Project would be consistent with SCAG's latest 2020-2045 RTP/SCS. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita transportation emissions 19 percent by 2035 and enable the SCAG regional to fulfil its portion of SB 375 compliance.
Goods Movement: Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not Applicable.** This recommended action called upon State agencies to implement regulations for promoting efficiency in goods movement.
Million Solar Roofs Program: Install 3,000 MW of solar-electric capacity under California's existing programs.	**Not Applicable.** This recommended action restated a goal, as part of Governor Arnold Schwarzenegger's Million Solar Roofs Program, to install 3,000 MW of new solar capacity by 2017. The Program reached its one-million solar roofs goal in 2019 and has installed nearly three-times the 3,000 MW target capacity.
Medium/Heavy-Duty Vehicles: Adopt medium and heavy-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures for vehicles.
Industrial Emissions: Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.	**Not Applicable.** The Project does not propose the types of large industrial sources that are covered by this measure (e.g., power plants, refineries, cement plants, etc.).
High Speed Rail: Support implementation of a high-speed rail system.	**Not Applicable.** This recommended action called upon the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy: Expand the use of green building practices to reduce the carbon	**Consistent.** As discussed above, the Project would be designed to meet the CALGreen building standards that are in effect at the time of

Table VIII-2
Consistency with the AB 32 Scoping Plan
and First Update GHG Emissions Reduction Strategies

Strategy/Recommended Action	Project Consistency
footprint of California's new and existing inventory of buildings.	its permitting. The latest standards achieve increased energy and construction efficiencies as compared to previous CALGreen standards. The Project would be in conformance with the current or next-generation CALGreen standards that are intended to help the State achieve and/or exceed the AB 32 GHG emissions reduction target.
High Global Warming Potential Gases: Adopt measures to reduce high global warming potential gases.	**Not Applicable.** State agencies are responsible for implementing these measures.
Recycling and Waste: Reduce methane emissions and landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	**Not Applicable.** This strategy does not apply to private land use projects such as the Project. However, it is worth noting that the Project would contract with a waste disposal services provider that meets AB 341 requirements for waste diversion.
Sustainable Forests: Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not Applicable.** Resource agency departments are responsible for implementing this measure.
Water: Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent.** This recommended action does not include specific or quantifiable goals for the water sector. However, the Project would be designed to meet the CALGreen building standards and other water efficiency measures that are in effect at the time of its permitting. As noted, California achieved its 2020 AB 32 GHG emissions reduction target four years ahead of schedule. It reasons that the CALGreen building standards and other applicable water efficiency measures would be capable of achieving or exceeding water-sector-related reductions outlined in the First Update.
Agriculture: In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not Applicable.** This recommended action concerned methane capture at large dairy facilities.
Source: NTEC, 2023.	

EO B-30-14, SB 32, and 2017 Scoping Plan

SB 32 adopted and codified Executive Order B-30-15's goal of reducing GHG emissions to 40 percent below 1990 levels by 2030. The 2017 Scoping Plan addresses how this target may be achieved. Specifically, it states that the Plan "establishes a path that will get California to its 2030 target" and "identifies how the State can each our 2030 climate target to reduce…GHG emissions by 40 percent from 1990 levels." The 2017 Scoping Plan also acknowledges how many emission reduction strategies would establish "a

broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050." The 2017 Scoping Plan and the SB 32 objectives that drive it involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Although a number of these strategies are currently promulgated, some have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. The 2017 Scoping Plan outlines and provides the basis for policies that are anticipated to help California achieve its targeted GHG emissions reductions for 2030 and beyond. Thus, it follows that if the Project would be consistent with the 2017 Scoping Plan, then the Project would be consistent with State efforts to achieve the 2030 GHG emissions target that was established by Executive Order B-30-15 and codified by AB 32. It also follows that the Project would be consistent with efforts to progress "on the path" to the 2050 target, as well.

Table VIII-3 provides a specific evaluation of the Project's consistency with applicable strategies of the 2017 Scoping Plan. Based on this evaluation, the Project would be consistent with all feasible and applicable strategies recommended in the 2017 Scoping Plan. Therefore, the Project would be consistent with State efforts to achieve the 2030 GHG emissions reduction target that was established by Executive Order S-3-05 and codified by AB 32. The Project would also be consistent with efforts to progress "on the path" to the 2050 target, as well.

Table VIII-3
Consistency Analysis – 2017 Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Senate Bill 350 (SB 350): • Requires that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030. • Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	CPUC, CEC, CARB	**Consistent.** As EDISON would provide electricity service to the Project Site, and as EDISON is tasked with achieving the latest SB 100 renewables mandates that exceed the prior SB 350 mandates, the Project would use electricity that goes beyond the renewables requirements of SB 350. The Project would also comply with the latest CalGreen and Title 24 energy efficiency standards that are in effect at the time of its permitting.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)	CARB, CalSTA, SGC, CalTrans CEC, OPR,	**Consistent.** GHG emissions generated by Project-related vehicular travel would benefit from the proposed regulations, and mobile

Table VIII-3
Consistency Analysis – 2017 Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
• At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. • Medium and heavy-duty GHG Phase 2 • Innovative Clean Transit • Last Mile Delivery • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."	Local agencies	source emissions generated by the Project would be reduced with the implementation of standards under the Advanced Clean Cars Program, consistent with the reduction of GHG emissions under AB 32. However, mobile source GHG emissions estimates do not include the additional 34-percent reduction in mobile source emissions attributable to this program. The Project would support this regulation as it would include electric vehicle parking minimums: • 25 percent EV-ready. • 15 percent EV-capable. • 5 percent EV Level 2 charger installed. The Project would indirectly benefit from CARB's Innovative Clean Transit and Advanced Clean Trucks programs, which were adopted in December 2018 and March 2021, respectively. With regard to SB 375, the Project's consistency with SCAG's latest 2020-2045 RTP/SCS is discussed later. Implementation of the 2020-2045 RTP/SCS, which the Project would aid in, is projected to reduce per capita transportation emissions 19 percent by 2035 (as compared to 2005 levels), thus enabling the SCAG region to fulfil its portion of SB 375 compliance.
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)	CARB	**Consistent.** The Project's consistency with SCAG's latest 2020-2045 RTP/SCS is discussed later in this report. Implementation of the 2020-2045 RTP/SCS, which the Project would aid in, is projected to reduce per capita transportation emissions 19 percent by 2035 (as compared to 2005 levels), thus enabling the SCAG region to fulfil its portion of SB 375 compliance.

Table VIII-3
Consistency Analysis – 2017 Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
By 2019, adjust performance measures used to select and design transportation facilities. Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection).	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	**Consistent.** The Project would not involve the construction of any transportation facilities.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	**Consistent.** The Project would support this policy as it would include the following EV parking minimums: • 25 percent EV-ready • 15 percent EV-capable • 5 percent EV Level 2 charger installed.
Implement California Sustainable Freight Action Plan: • Improve freight system efficiency. • Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	CalSTA, CalEPA, CNRA, CARB, CalTrans, CEC, GoBiz	**Not Applicable**. This action/strategy calls upon State agencies and regulators to implement recommendations of the California Sustainable Freight Action Plan. The Project would not include freight transportation or warehousing uses.
Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.	CARB	**Consistent.** On September 27, 2018, CARB amended the LCFS regulation to target a 20 percent reduction in CI from a 2010 baseline by 2030. This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with the LCFS. CalEEMod, which was used to estimate the Project's GHG emissions, accounts for the LCFS when calculating mobile source GHG emissions.
Implement the Short-Lived Climate Pollutant Strategy by 2030:	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**Consistent.** The Project would comply with the CARB Short-Lived Climate Pollutant (SLCP) Reduction Strategy, which limits the use of

Table VIII-3
Consistency Analysis – 2017 Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
• 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels.		hydrofluorocarbons for refrigeration uses.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**Not Applicable.** This strategy calls on regulators to reduce GHG emissions from landfills and is not applicable to the Project. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 75-percent reduction in the level of statewide disposal of organic waste (from 2014 levels) by 2025.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Not Applicable.** This applies to State regulators and is not applicable to the Project. Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink: • Protect land from conversion through conservation easements and other incentives. • Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity. • Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments. • Establish scenario projections to serve as the foundation for the Implementation Plan.	CNRA and departments within, CDFA, CalEPA, CARB	**Not Applicable.** This applies to State regulators and is not applicable to the Project. This regulatory program applies to Natural and Working Lands, and it is not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.

Table VIII-3
Consistency Analysis – 2017 Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	**Not Applicable.** This applies to State regulators and is not applicable to the Project. This regulatory program applies to Natural and Working Lands, and it is not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Implement Forest Carbon Plan	CNRA, CAL FIRE, CalEPA and departments within	**Not Applicable.** This applies to State regulators and is not applicable to the Project**.** This regulatory program applies to state and federal forest land, and it is not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors	State Agencies and Local Agencies	**Not Applicable.** This applies to State regulators and is not applicable to the Project**.** Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.
Source: CARB, California's 2017 Climate Change Scoping Plan, November 2017.		

EO B-55-18, AB 1279, and the 2022 Scoping Plan

As explained earlier, the 2022 Scoping Plan addresses the recent signing of AB 1279, which codified EO-B-55-18's target for California to achieve and maintain carbon net neutrality by 2045 (equivalent to a reduction in statewide anthropogenic GHG emissions of 85 percent below 1990 levels). The 2022 Scoping Plan establishes a scenario by which the State may achieve this goal by 2045 or earlier.

The 2022 Scoping Plan reaffirms and clarifies the role of local governments in achieving the State's climate goals, particularly as it concerns the approval of new land use development projects and their environmental review under CEQA. It outlines three distinct approaches that lead agencies may consider for evaluating the consistency of proposed plans and residential and mixed-use development projects with the State's climate goals. In other words, the 2022 Scoping Plan considers these approaches to evaluate whether a project may have a less than significant impact on GHG emissions.

However, it notes that these approaches are recommendations only and that they do not supplant lead agencies' discretion to develop their own evidence-based approaches for determining whether a project would result in a potentially significant impact on GHG emissions.

The first approach involves consistency with a GHG reduction plan, such as a CEQA-qualified CAP. Though the City has developed a CAP, it is not CEQA-qualified. Therefore, this approach is not applicable to the Project.

The second approach involves determining whether a project would result in net-zero emissions. However, the 2022 Scoping Plan acknowledges that this approach may not be appropriate or even feasible for every project.

The third approach involves assessing a project's consistency with key project attributes that have been demonstrated to reduce operational GHG emissions while advancing fair housing. Table VIII-4 presents these attributes and a discussion of the Project's consistency with them. According to the 2022 Scoping Plan, the project attributes are intended as a guide to help local jurisdictions, such as the City of Torrance, qualitatively identify residential and mixed-use projects that are clearly consistent with the State's climate goals. The 2022 Scoping Plan considers residential and mixed-use development projects incorporating the following key project attributes to be aligned with the State's priority GHG reduction strategies for local climate action and therefore consistent with the 2022 Scoping Plan and other plans, policies, or regulations adopted for the purposes of reducing GHGs. The 2022 Scoping Plan acknowledges that projects incorporating some, but not all, of the key project attributes may also be consistent with the State's climate goals, at the discretion of the lead agency. As shown, the Project would be substantially consistent with the 2022 Scoping Plan's key project attributes.

As shown, the Project would be substantially consistent with the key project attributes shown in Table VIII-4. The balance of considerations supports this determination. The Project would be inconsistent with some measures, but it would exceed, sometimes greatly, the criteria and considerations of other measures. For example, the Project's EV charging infrastructure would not meet CALGreen's Tier 2 Residential Voluntary Measure requirements. However, the Project would achieve a residential density that greatly exceeds the 20 unit per acre criteria. The Project would only set aside 15 percent of units for affordable housing, but these units would be set aside for households qualifying at the Very Low Income threshold, not merely the Low Income threshold.

Table VIII-4
Consistency Analysis:
2022 Scoping Plan et. al. Regulations – Key Residential and Mixed-Use Project Attributes that Reduce GHGs

Key Project Attribute	Project Consistency
Priority Area: Transportation Electrification	
Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.	**Not Consistent.** The Project would provide EV charging infrastructure that is consistent with CALGreen Residential Mandatory Measures. However, the Project's EV charging infrastructure would be less than the CALGreen Tier 2 Voluntary Measures, which are the following: • 40 percent EV ready parking spaces. • 15 percent parking spaces with EV Level 2 charger installed.
Priority Area: VMT Reduction	
Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).	**Consistent.** The Project is located on an infill site that is surrounded by urban uses and served by existing utilities and public services.
Does not result in the loss or conversion of natural and working lands.	**Consistent.** As explained, the Project is located on an infill site with existing development. It would not result in the loss or conversion of natural and working lands.
Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or Is in proximity to existing transit stops (within a half mile), or Satisfies more detailed and stringent criteria specified in the region's SCS.	**Consistent.** The Project would have a residential density of 49 dwelling units per acre (272 units on a 5.5-acre site), which greatly exceeds the attribute's 20 dwelling unit-per-acre criteria. To be discussed in greater detail below, the Project would be consistent with the 2020-2045 RTP/SCS.
Reduces parking requirements by: • Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or • Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or • For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.	**Consistent.** The Project would have unbundled parking.
At least 20 percent of units included are affordable to lower-income residents.	**Not Consistent.** The Project would include 28 units, 15 percent of a 181-unit base, set aside for Very Low Income households. This is nine units less than would be achieved by the 20 percent criteria.

Table VIII-4
Consistency Analysis:
2022 Scoping Plan et. al. Regulations – Key Residential and Mixed-Use Project Attributes that Reduce GHGs

Key Project Attribute	Project Consistency
Results in no net loss of existing affordable units.	**Consistent.** The Project would not result in the loss of any housing units. The Project Site is currently developed with a government office building and related surface parking areas.
Priority Area: Building Decarbonization	
Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	**Consistent.** The Project would utilize all-electric appliances without any natural gas connections.
Source: CARB, 2022 Scoping Plan for Achieving Carbon Neutrality (Appendix D), November 2022.	

2020-2045 RTP/SCS

As noted earlier, SCAG's latest 2020-2045 RTP/SCS is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita vehicle GHG emissions by 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance. Implementation is also projected to reduce daily VMT per capita by 5 percent by 2045.

The Project would be consistent with the goals and land use planning strategies of the 2020-2045 RTP/SCS. As explained earlier, PGA's such as Job Centers, TPAs, HQTAs, NMAs, Livable Corridors, and SOIs account for only four percent of the SCAG region's total land area, but the 2020-2045 RTP/SCS anticipates that 64 percent of new household growth will occur in these PGAs. According to the 2020-2045 RTP/SCS, dense infill development in PGAs can support the goals of the 2020-2045 RTP/SCS by reducing travel distances, increasing mobility options, improving access to workplaces, and conserving the region's resource areas. The Project Site is located in a PGA – specifically an NMA. The 2020-2045 RTP/SCS targets growth in NMAs because of NMA's robust residential to non-residential Land use connections and high roadway intersection densities. These features promote safer, multimodal, short trips and can reduce reliance on single occupancy vehicles, thus reducing VMT. In fact, according to the Project's Transportation Screening Analysis Memorandum, the Project Site is located in an area that generates daily VMT on a per capita basis that is 15 percent or more below the LA County Home-Based VMT per Capita average. Therefore, development of the Project at the Project Site would be consistent with the 2020-2045 RTP/SCS's goals and land use planning strategies that emphasize dense infill residential land use development in PGAs.

City of Torrance Climate Action Plan

As explained earlier, the City's CAP is not CEQA-qualified under the requirements of CEQA Guidelines Section 15183.5 but nevertheless identifies how the City may reduce its GHG emissions in line with the State's AB 32 targets. The CAP determines that implementation of five source strategies – Land Use and Transportation, Energy Efficiency, Solid Waste, Urban Greening, and Energy Generation and Storage – would reduce the City's GHG emissions to 49 percent below 2005 levels by 2035 and put the City "on a path" towards reducing emissions 80 percent below 1990 levels by 2050. The CAP includes a long list of goals, measures, and sub-strategies under each of the five source strategies, most of which apply to the City and not to private land use development projects such as the Project. Table VIII-5 assesses the Project's consistency with applicable sub-strategies.

Table VIII-5
Consistency Analysis:
City of Torrance Climate Action Plan – Applicable Sub-strategies

Sub-strategy	Project Consistency
Source Strategy: Land Use and Transportation (LUT)	
LUT A1.2: Adopt charging standards beyond CalGreen 2016 requirements.	**Consistent.** This strategy tasks the City with exploring the feasibility of requiring EV charging standards that go beyond CALGreen 2016 requirements. While this strategy does not directly apply to the Project, which is a private land use development, it is worth noting that the Project would include EV charging infrastructure that is consistent with CALGreen requirements, which exceed the 2016 requirements.
LUT B1.1: Facilitate bike-sharing.	**Consistent.** This strategy tasks the City with encouraging public and private mobility services within the City. It does not directly apply to the Project, but the Project would nevertheless support this strategy by including 132 bicycle parking spaces.
LUT C2: Expand Transit Network	**Consistent.** This list of sub-strategies involves the expansion of the transit network and transit ridership in the city. The Project's consistency with these strategies involves much of the same considerations that demonstrate the Project's consistency with the 2020-2045 RTP/SCS, which shares these goals. The Project would construct infill housing in transit-supportive densities (i.e., over 20 dwelling units per acre) in a NMA, which would leverage future transit investments in the Project area.
LUT D2.3: Require new developments to provide pedestrian, bicycle, and transit amenities.	**Consistent.** The Project would support this strategy by including 132 bicycle parking spaces.
LUT D2.4: Require commercial and multi-family residential projects to provide permanent bicycle parking facilities.	**Consistent.** As noted, the Project would include 132 bicycle parking spaces to support this strategy.

Table VIII-5
Consistency Analysis:
City of Torrance Climate Action Plan – Applicable Sub-strategies

Sub-strategy	Project Consistency
LUT F1.4: Encourage mixed-use and infill development projects in key in-fill areas.	**Consistent.** The Project would support regional efforts to build infill housing in transit-supportive densities within PGAs.
LUT F4.1: Encourage business establishment mix that promotes walking.	**Consistent.** The Project would be consistent with this strategy's neighborhood-oriented development principles. As discussed earlier, the Project would be located within a NMA (Neighborhood Mobility Area). The 2020-2045 RTP/SCS explains that dense infill development within NMAs can reduce travel distances, which directly promotes active transportation modes such as walking.
Source Strategy: Energy Efficiency (EE)	
EE F1.1: Encourage tree planting at plan check.	**Consistent.** The Project would include tree planting as part of the required landscaping.
Source Strategy: Energy Generation and Storage (EGS)	
EGS A2.2: Encourage and support on-site installation and use of renewable and alternative energy generation systems for residential, commercial, institutional, and industrial uses.	**Consistent.** The Project would include roof-mounted solar photovoltaic systems that are estimated to realize approximately 40 percent energy offset.
Source: City of Torrance, Climate Action Plan, December 2017.	

City of Torrance General Plan

The City of Torrance General Plan includes policies that would directly or indirectly result in GHG reductions. Table VIII-6 assesses the Project's consistency with the applicable policies of the City's General Plan.

Conclusion

In summary, the consistency analysis provided above demonstrates that the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As a result, the Project's GHG emissions would not result in a significant impact to the environment, and Project-specific impacts with regard to climate change would be less than significant.

Table VIII-6
Consistency Analysis:
City of Torrance General Plan – Applicable Policies

Policy	Project Consistency
Policy CR.13.2: Work with neighboring cities to implement local and regional projects that improve mobility on freeways and railways, reduce emissions, and improve air quality.	**Consistent.** By developing dense residential housing in an infill location within a NMA, the Project would be consistent with regional efforts to improve mobility and reduce VMT, which would aid in the reduction of transportation-related GHG emissions.
Policy CR.13.3: Support regional air quality goals through conscientious land use and transportation planning and the implementation of resource conservation measures.	**Consistent.** Same as above. By contributing to reductions in per capita VMT, the Project would reduce reliance on fossil fuels and reduce GHG emissions associated with their usage.
Policy CR.13.5: Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling.	**Consistent.** Same as above. The Project's development in an infill location within a NMA is consistent with regional strategies to promote alternative transit modes and leverage future transit investments.
Policy CR.13.7: Encourage the use of alternative fuel vehicles and re-refined oil.	**Consistent.** The Project's parking spaces would be, at a minimum: • 25 percent EV-ready. • 15 percent EV-capable. • 5 percent EV Level 2 charger installed.
Policy CR.13.8: Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality.	**Consistent.** The Project would be built in accordance with the latest CALGreen energy efficiency standards. Current standards greatly exceed those that were in place at the time this policy was adopted. The Project would also include roof-mounted solar photovoltaic systems that are estimated to realize approximately 40 percent energy offset.
Policy CR.14.1: Support the California Air Resources Board in its ongoing plans to implement AB 32, and fully follow any new AB 32-related regulations.	**Consistent.** As assessed earlier, the Project would be consistent with AB 32 strategies, actions, and related regulations for achieving the State's GHG reduction goals.
Source: City of Torrance, General Plan, April 2010.	

Project Emissions

As discussed above, compliance with applicable GHG emissions reductions plans renders a Project less than significant. In support of the consistency analysis provided above, the following quantitative estimates of the Project's GHG emissions are provided. The Project would result in direct and indirect GHG emissions generated by the following emissions sources:

- Construction: emissions associated with construction-related equipment and vehicle use.

- Area Sources: emissions associated with the on-site use of powered equipment.
- Energy Sources: emissions associated with a project's electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.
- Mobile Sources: emissions associated with a project's related vehicle travel.
- Solid Waste: emissions associated with the disposal and retention of solid waste in landfills.
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.
- Refrigerant Sources: fugitive GHG emissions from associated with building air conditioning and refrigeration equipment

Construction

Construction of the Project could begin as early as 2025 and would last approximately 30 months. GHG emissions associated with the construction of the Project, including off-site sewer improvements, were estimated for each year of construction activity and summed. As shown in Table VIII-7, construction of the Project is estimated to generate approximately 3,479 $MTCO_2e$. As recommended by the SCAQMD, the total construction-related GHG emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's annual operational emissions) in order to determine the Project's annual GHG emissions inventory.[41] This results in annual Project construction emissions of approximately 116 $MTCO_2e$.

Table VIII-7
Construction-Related GHG Emissions

Year	Emissions ($MTCO_2e$)
2025 (includes off-site sewer improvements)	1,915
2026	1,053
2027	511
Total	3,479
Amortized over 30 years	116
Source: NTEC, 2023.	

41 *SCAQMD Governing Board Agenda Item 31. December 5, 2008.*

Operations

Table VIII-8 shows the Project's estimated GHG emissions from operations, including the Project's annualized construction-related GHG emissions that are separately detailed in Table VIII-7. Operation of the Project is estimated to result in approximately 2,151.4 $MTCO_2e$ per year.

Table VIII-8
Operations-Related GHG Emissions at Project Buildout

Source	Emissions ($MTCO_2e$)
Area	9.51
Energy	453
Mobile	1,474
Solid Waste	65.4
Water/Wastewater	33.0
Refrigerants	0.47
Construction	116
Total Emissions	2,151.4
Source: NTEC, 2023.	

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. 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?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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 create a significant hazard to the public or the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a residential development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project

would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the Project would be required to comply with all applicable federal, state, and local regulations governing such activities.

The proposed residential development would be similar to other residential uses already found in the Project Site area and region. The Project would use common types of cleaning products, paint, petroleum products, etc., which would be required to be used and stored in accordance with manufacturer requirements. The Project would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Therefore, Project impacts related to the transport, use, and disposal of hazardous materials would be less than significant.

b) Would the project 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?

Less Than Significant With Mitigation Incoporated. A *Phase I Environmental Site Assessment* (*Phase I ESA*) was prepared for the Project (refer to Appendix F) by GEOCON West, Inc., dated July 2022. The purpose of the *Phase I ESA* was to determine if there are any recognized environmental concerns (RECs) associated with the Project Site.[42] The *Phase I ESA* included a review of current and historical records associated with on- and off-site uses; a property inspection and viewing of adjacent and surrounding properties for conditions that could be RECs; interviews with present and past owners, operators and/or occupants of a property, and local government officials; and an evaluation of the information gathered as part of the records review, site reconnaissance, and interviews.

The *Phase I ESA* identified the past petroleum production use at the Project Site, including above-ground storage tanks (ASTs), an oil derrick (and well), and apparent waste oil and water ponds and the HAZNET database reporting of contaminated soil contained onsite by “disposal surface impoundment” as RECs for the site. No records regarding cleanup of petroleum-impacted soil (if any) were identified and as such, the potential exists for petroleum-impacted soil to exist at the site. The preparers of the *Phase I ESA* recommend that a Soil Management Plan (SMP) be prepared prior to demolition of the existing building and pavements and redevelopment of the site that will describe procedures and protocols for handling apparently impacted soil, if encountered. Additionally, the SMP would describe the appropriate handling of any undocumented underground storage tanks, septic systems, water wells, or other subsurface structures that might be encountered during site grading and excavation and any applicable regulatory agency reporting/permitting requirements. The preparation and implementation of an SMP for the Project are included in Mitigation Measure HAZ-1,

[42] *An REC is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.*

below. Implementation of this mitigation measure would ensure that any potential impacts related to development of the site would be less than significant.

The existing office building on the Project Site was constructed in 1989. Given the age of some of the existing buildings on the Project Site, it is possible that asbestos-containing materials (ACMs) and lead-based paint (LBP) could be encountered at the Project Site during the demolition and remodeling period. As such, the Applicant would be required as part of the Project permitting process to provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no ACMs are present in the building. If ACMs are found to be present, the ACMs would need to be abated in compliance with SCAQMD's Rule 1403, as well as other applicable state and federal rules and regulations. Also, the Applicant would be required as part of the Project permitting process to submit an LBP survey to the Department of Building and Safety. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to Occupational Safety and Health Administration (OSHA) regulations.

For these reasons and with mitigation, the Project would not 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. Therefore, Project impacts related to this issue would be less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant With Mitigation Incorporated The only school located within 0.25 miles of the Project Site is the Ambassador High School. As discussed above, the proposed residential development would be similar to other residential uses already found in the Project Site area and region. The Project would use common types of cleaning products, paint, petroleum products, etc., which would be required to be used and stored in accordance with manufacturer requirements. The Project would not require the routine transport, use, or disposal of hazardous materials that would pose a hazard to the school. Additionally, through implementation of an SMP (refer to Mitigation Measure HAZ-1) to accommodate the potential for onsite soil contamination and through implementation of existing regulations associated with ACMs and LBP, thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, with mitigation, Project impacts related to this issue would be less than significant.

d) Would the project 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?

No Impact. The Project is not included on any list compiled pursuant to Government Code Section 65962.5 (i.e., certain hazardous waste facilities, sites that include leaking underground storage tanks, contaminated drinking water wells, and landfills with migrating hazardous waste).[43] Thus, the Project would not create a significant hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts related to this issue would occur.

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?

No Impact. The Project Site is located approximately 1.3 miles from Torrance Municipal Airport (Zamperini Field). However, the Project's maximum building height is 68 feet and would not affect any flight paths. Additionally, the Project Site is not located within the 60 dBA CNEL noise contour associated with airport operations, meaning that the Project would not expose people residing or working at the Project to excessive noise levels.[44] Thus, the Project would not expose people residing or working in the project area to excessive noise levels. Therefore, no impacts related to this issue would occur as a result of the Project.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project includes a sewer line upgrade from 12 inches to 15 inches would be required to meet the sewer discharge demands of the Project. The lateral extent of the sewer line upgrade would be along the west edge of Crenshaw Boulevard from 230th Street to 233th Street, approximately 1,200 feet in length, joining the existing 15-inch sewer downstream of 233rd Street. Additionally, the Project includes demolition and removal of the existing 69,913-square-foot Los Angeles County Department of Children and Family Services (DCFS) office building and surface parking with 347 vehicle parking spaces from the Project Site and development of the site with 272 residential dwelling units.

It is anticipated that the construction of the upsized sewer line would require at least one southbound lane closure due to the existing sewer main location within Crenshaw

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43 *Department of Toxic Substance Control, https://www.envirostor.dtsc.ca.gov/public/map/?myaddress, accessed January 5, 2023.*

44 *City of Torrance, 2009 General Plan, April 2010. Figure N-3.*

Boulevard. In order to keep a sewer line operational at all times, a temporary 12-inch bypass line may be constructed to maintain sewer connectivity while the existing 12-inch line is being removed and replaced with the new 15-inch permanent sewer line. This is likely to be constructed in phases and with planned sequencing and overlapping construction activities. Each segment may be completed within a two-week period lasting a total of approximately four months for the full sewer upgrade. Given that the sewer line upgrade would not require full roadway closures and would be temporary, this activity would not impair or interfere with emergency response.

The Project Site is not part of an adopted emergency response plan and is not located directly along any roadways that could be used for emergency evacuation. The Project includes development of the Project Site within the boundary of the existing on-site uses and would not extend beyond. Additionally, the Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. All construction equipment and activities for the Project would be confined to the Project Site. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Prior to the issuance of a construction permit, the Applicant would be required by the City to develop an emergency response plan in consultation with the Torrance Fire Department (TFD). The emergency response plan shall include but not be limited to mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, Project impacts related to this issue would be less than significant.

g) Would the project expose people or structures either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is located in an urbanized area of the City that is not at risk of experiencing wildland fires. Additionally, the Project Site is not located in a fire hazard severity zone, as identified by the California Department of Forestry and Fire Protection (CalFire) and the City's General Plan Safety Element. The nearest fire hazard zone is located approximately 4.7 miles southwest of the Project Site. Thus, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, no Project impacts related to wildland fires would occur as a result of the Project.

Mitigation Measures

HAZ-1: A Soil Management Plan shall be developed and implemented to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan shall include practices that are consistent with the California Title 8,

Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals shall be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan shall provide guidelines for the following:

- Identifying impacted soil
- Assessing impacted soil
- Soil excavation
- Impacted soil storage
- Verification sampling
- Impacted soil characterization and disposal

The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils are encountered, soils shall be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) shall determine whether further assessment is warranted. The Soil Management Plan shall be submitted to the CPUC 30 days prior to the start of construction for review and approval.

Cumulative Impacts

The geographic extent of the Project's environmental impacts related to hazards and hazardous materials is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the boundaries of the Project Site. All related projects would be subject to discretionary or ministerial review by the City, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those related projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, with mitigation, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant cumulative impacts related to hazards and hazardous materials would occur.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
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:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
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	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In a flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater?

Less Than Significant Impact. During the Project's construction phase, soil would be temporarily exposed. In addition, on-site watering activities to reduce airborne dust would occur. Also, construction-related materials, including adhesives, coatings, lubricants, and fuel would be temporarily stored on the Project Site. However, the Applicant would be required to comply with the NPDES General Construction Permit and the Los Angeles County Department of Public Works LID Manual, including the preparation of a SWPPP and implementation of BMPs, required to minimize soil erosion/sedimentation and other pollutant loads from the Project Site from entering the storm drains during the construction period. Compliance with the NPDES General Permit requirements, the Los Angeles County Department of Public Works LID Manual, and implementation of the SWPPP and BMPs, would ensure that any construction stormwater runoff would not violate water quality and/or discharge requirements.

Additionally, during the Project's operational phase, all stormwater flows would be directed to storm drainage and BMP infrastructure and would not come into contact with bare soil surfaces. The Applicant would be required to comply with the applicable regulations in TMC Division 4, Chapter 10 (Stormwater and Urban Runoff Pollution Control). TMC Section 410.1.040(b) requires the preparation of an SWPPP. Additionally, construction and operation of the Project would be required to comply with applicable regulations in TMC Division 4, Chapter 11 (Low Impact Development Strategies for Development and Redevelopment), which require construction and operations of development and redevelopment projects to comply with the municipal NPDES permit, lessen the effects of development to water quality by using smart growth practices, and integrate LID principles to mimic predevelopment hydrologic patterns through infiltration, evapotranspiration, rainfall harvest, and use. LID is a stormwater management strategy that reduces the amount of impervious area of a completed project site and promotes the use of infiltration and other controls that control runoff. Compliance with the City's LID requirements would control the amount of surface water runoff leaving the Project Site and would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Conformance with existing regulations would ensure construction and operational activities would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality. Therefore, Project impacts related to water quality would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. In its existing condition, the Project Site is 78 percent impervious, and stormwater on the site flows to gutters and is collected by various catch basins.[45] According to the *Phase I ESA* prepared for the Project Site, groundwater was not encountered in the borings advanced at the site (at a depth of 50.5 feet). Given the developed nature of the Project Site and surrounding urban area, the Project Site is not a significant source of groundwater recharge. Under post-Project conditions, the imperviousness of the Project Site would be reduced to 71 percent impervious, allowing for more stormwater to infiltrate the site when compared to the existing condition. However, given that the site is not a significant source of groundwater recharge, this increase in infiltration would not affect groundwater supplies. Potable water would be provided to the Project from Torrance Municipal Water's (TMW) existing water supply sources. Additionally, the Project would not install any groundwater wells and would not otherwise directly or indirectly withdraw any groundwater during construction or operations of the Project. Thus, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, no Project impacts related to groundwater recharge would occur.

c) Would the project 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 result in substantial erosion or siltation on- or off-site?

i) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. No streams or rivers are located on or near the Project Site. During the Project's construction phase, soil would be temporarily exposed. However, the Applicant would be required to prepare and implement a SWPPP in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities and the Los Angeles County Department of Public Works LID Manual. The site-specific SWPPP would be prepared prior to any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include construction BMPs and erosion control measures to prevent pollution in stormwater discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, stormwater inlet protection, and soil stabilization measures, etc.). The SWPPP

45 *Ibid.*

would be subject to review and approval by the City. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities.

Additionally, during the Project's operational phase, all stormwater flows would be directed to BMPs and storm drainage features and would not come into contact with bare soil surfaces. Thus, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site. Therefore, Project impacts related to erosion or siltation would be less than significant.

ii) Substantially increase the rate or amount or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. As stated previously, in its existing condition, the Project Site is 78 percent impervious, and stormwater on the site flows to gutters and is collected by various catch basins. Under post-Project conditions, the imperviousness of the Project Site would be reduced to 71 percent impervious. As shown in Table X-1, the Project would result in reduced flows to the local stormdrain.

Table X-1
Pre- and Post-Project Peak Runoff Flows and Volumes

Storm Event	Existing (78% Impervious)		Post-Project (71% Impervious)		Existing to Post-Project
	Peak Flow Q (cfs)	24-hr Runoff Volume (ft^3)	Peak Flow Q (cfs)	24-hr Runoff Volume (ft^3)	% Reduction in Runoff Volume
10	6.0	59,893	5.5	55,333	7.6
25	8.1	73,833	7.7	68,303	7.5
50	9.7	84,242	9.3	77,990	7.4

cfs = cubic feet per second *ft^3 = cubic feet*

Source: Psomas, June 9, 2023. Refer to Appendix G.

The City uses the Los Angeles County Department of Public Works Hydrology Manual for designing and hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm even and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements. Runoff would follow new discharge paths and drain to on-site storm drain infrastructure, including catch basins, planter drains, building roof drain downspouts, etc., throughout the Project Site. The rate and amount of stormwater runoff would be controlled through this on-site BMP infrastructure and could be accommodated by the City's existing storm drain system. Thus, the Project

would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, Project impacts related to flooding would be less than significant.

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?

Less Than Significant Impact. Regarding storm drain capacity, refer to response to Checklist Question X(c)(ii) (Hydrology and Water Quality – on- or off-site flooding. Regarding water quality, refer to response to Checklist Question X(a) (Hydrology and Water Quality – Water Quality).

iv) Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).[46] Thus, the Project would not have the potential to impede or redirect flood flows. Therefore, no impacts related to this issue would occur as a result of the Project.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The Project Site is not located near any large bodies of water. The Pacific Ocean is located approximately 3.5 miles west of the site. The dam closest to the Project Site is the Palow Verdes Reservoir, which is 4.6 miles south of the Project Site. As discussed above, the Project Site is not located in a flood zone. Thus, the Project would not risk release of pollutants due to inundation by a flood hazard, tsunami, or seiche. Therefore, no impacts related to this issue would occur as a result of the Project.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed previously, the Project would be required to comply with the NPDES General Construction Permit, including the preparation of a SWPPP and implementation of BMPs that would require the Project to minimize soil erosion/sedimentation and other pollutant loads from the Project Site from entering the storm drains during the construction period. Additionally, during the Project's operational phase, all stormwater flows would be directed to storm drainage and BMP infrastructure and would not come into contact with bare soil surfaces. The Applicant would be required to comply with the Los Angeles County Department of Public Works LID Manual and would be required to include a site design approach and BMPs that address runoff and pollution at the source. Such BMPs could include planter box/harvesting/infiltration basins

46 *FEMA, https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor, accessed, January 16, 2023.*

and trenches and water quality inlets.[47] Further, to comply with LID Manual the Project would be required to capture and treat the first 3/4-inch of rainfall from a storm event or the runoff associated with the 85th percentile, 24-hour storm event, whichever is greater, in accordance with established stormwater treatment priorities. According to the *Phase I ESA* prepared for the Project Site, groundwater was not encountered in the borings advanced at the site (at a depth of 50.5 feet). Given the developed nature of the Project Site and surrounding urban area, the Project Site is not a significant source of groundwater recharge. Under post-Project conditions, the imperviousness of the Project Site would be reduced to 71 percent impervious, allowing for more stormwater to infiltrate the site when compared to the existing condition. However, given that the site is not a significant source of groundwater recharge, this increase in infiltration would not affect groundwater quality. Compliance with the NPDES and the LID Manual and implementation of the SWPPP and BMPs would ensure that the Project's stormwater runoff would not violate water quality and/or discharge requirements. Therefore, Project impacts related to this issue would be less than significant.

Cumulative Impacts

The sites of the Project and the related projects are located in an urbanized area where the sites themselves and most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs it generally does not lead to substantial additional runoff, since new developments is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the County's LID Manual and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, Project cumulative impacts related to hydrology and water quality would be less than significant.

47 *2325 Crenshaw Blvd. Preliminary Hydrology Report, Psomas, Linda Boswell, P.E., June 9, 2023. Refer to Appendix TBD.*

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a) Would the project physically divide an established community?

No Impact. The Project Site is located in an urbanized area of the City and is currently developed with a government office and associated landscaping and parking. The Project Site is surrounded by existing development and roadway and utility infrastructure. The Project includes demoltion and removal of all existing improvements from the Project Stie and infill development of the site with 272 residential dwelling units. The Project would not physically divide an established community. Therefore, no impacts related to this issue would occur as a result of the Project.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or adopted plan for the purpose of avoiding or mitigating an environmental effect?

No Impact. As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations associated with development of the Project Site. Thus, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or adopted plan for the purpose of avoiding or mitigating an environmental effect. Therefore, no impacts related to land use and planning would occur as a result of the Project.

Regional Plans

Southern California Association of Governments

SCAG functions as the MPO for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

2020-2045 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS, periodically. SCAG's most recent RTP/SCS is the 2020-2045 RTP/SCS, finally adopted on September 3, 2020 by SCAG's Regional Council.

The 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, planning strategies, and the people whose collaboration can improve the quality of life for Southern Californians.

The 2020-2045 RTP/SCS outlines more than $638 billion in transportation system investments through 2045 and was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increased growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

2020-2045 RTP/SCS Consistency Discussion

The Project's consistency with the 2020-2045 RTP/SCS is discussed in Table XI-1. As discussed there, the Project would be substantially consistent with the 2020-2045 RTP/SCS. Therefore, impacts related to consistency with the 2020-2045 RTP/SCS would be less than significant.

Table XI-1
Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Guiding Principles	Consistency Assessment
Goal 1 Encourage regional economic prosperity and global competitiveness.	**Not Applicable/Consistent.** This goal is directed towards SCAG and the City and does not apply to the Project. However, the Project would construct housing near sources of employment and shopping in an existing urban area, supporting the regional economic prosperity and global competitiveness of Southern California.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project Site is located in a highly urbanized area of the City, near the Sepulveda Boulevard and Crenshaw Boulevard corridors, which are developed with sources of employment, shopping, and entertainment. The Project Site area is served by Torrance Transit Lines 7 and 10. The Project is an infill development that includes demolition and removal of approximately 63,875 square feet of commercial uses and surface parking and development of the Project Site with 272 multi-family residential units. Twenty-eight of the residential units would be restricted to Very Low Income households. Additionally, the Project would include a total of 132 bicycle parking spaces (120 long-term spaces and 12 short-term spaces), which would support cycling as a form of transportation. The Project would allow for accessible and reliable modes of travel for the Project residents as an inherent aspect of the Project Site's proximity to sources of transit and the Project's inclusion of bicycle parking spaces. The Project would ensure safe travel at and near the Project Site by improving the public sidewalks adjacent to Project Site and ensuring safe vehicular and pedestrian access. In addition, the Project would include lighting of pedestrian pathways adjacent to the Project Site to allow for safe travel. Furthermore, the Project would be subject to the City's access requirements to ensure that all access points, driveways, and

Table XI-1
Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Guiding Principles	Consistency Assessment
	parking areas would not create a design hazard to local roadways. Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and goods.
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	**Consistent.** The Project would construct housing units in a walkable urban neighborhood near existing sources of employment and shopping. The Project would include 120 long-term bicycle parking spaces and 12 short-term parking spaces. The Project Site is in close proximity to transit, including Torrance Transit Lines 7 and 10. Thus, the Project would increase personal mobility and provide increased travel choices to residents.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Project is an infill development that includes demolition and removal of approximately 63,875 square feet of commercial uses and surface parking and development of the Project Site with 272 multi-family residential units. Twenty-eight of the residential units would be restricted to Very Low Income households. Additionally, the Project would include a total of 132 bicycle parking spaces (120 long-term spaces and 12 short-term spaces), which would support cycling as a form of transportation. By siting housing in a transit- and jobs-rich area, the Project would thereby contribute to an overall reduction in VMT and associated GHG emissions.
Goal 6 Support healthy and equitable communities.	**Consistent.** The Project would construct housing units near sources of employment shopping, and entertainment. Of the 272 proposed dwelling units, 28 of the units would be set aside for Very Low Income households. The Project would include 120 long-term bicycle parking spaces and 12 short-term parking spaces. The Project Site is in close proximity to transit, including Torrance Transit Lines 7 and

Table XI-1
Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Guiding Principles	Consistency Assessment
	10. Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work and to shop. By developing new market-rate and affordable housing and facilitating alternatives to driving, the Project would support healthy and equitable communities.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent.** The Project includes development of multi-family residential units on an infill site in an urbanized area of the City that is near sources of transit. Also, the Project includes pedestrian improvements and 132 bicycle parking spaces. This type of transit-oriented residential project helps to reduce dependence on automobile travel and to reduce mobile-source GHG emissions.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Consistent.** The Project includes development of the Project Site 272 multi-family residential units, 28 of which would be restricted to Very Low Income Households. The unit types would consist of 33 studios, 106 one-bedrooms, 114 two-bedrooms, and 18 three-bedrooms. Also, the Project includes a total of 132 bicycle parking spaces, which would support cycling as a form of transportation. The Project Site area is served by Torrance Transit Lines 7 and 10. Thus, the Project would provide a variety of housing typologies, with bicycle parking, near transit lines.
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent.** The Project is an infill development that would not affect any natural or agricultural lands or restoration of habitats.
Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.

Table XI-1
Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Guiding Principles	Consistency Assessment
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This principle is directed toward SCAG that has the responsibility of monitoring the progress of the 2020-2045 RTP/SCS.
Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Source: 2020-2045 RTP/SCS, finally adopted September 3, 2020.	

South Coast Air Quality Management District

Air Quality Management Plan

The Project Site is located within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socioeconomic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socioeconomic growth forecasts are a key component to guide the Basin toward the attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

AQMP Consistency Discussion

Air quality impacts of the Project and consistency of the Project with the AQMP are discussed in response to Checklist Question III(a) (Air Quality – AQMP Consistency) of this document. As discussed therein, the Project would be substantially consistent with the 2020 AQMP. Therefore, impacts related to consistency with the 2020 AQMP would be less than significant.

Local Plans

City of Torrance

General Plan

The Torrance General Plan is the principal policy document for guiding future development in the City. The General Plan reflects the community's shared values of

what Torrance is today and what it will be in the future. The plan has a long-term horizon, addressing an approximately 15– to 20–year time frame. At the same time, it provides a foundation for the day-to-day decisions of the City Council, City commissions, and City staff. The General Plan defines what kind of urban development is desired by the community, what physical and social infrastructure are required to support that development, and how community development goals will be achieved.

Consistency of the Project with applicable General Plan policies is discussed in Table XI-2. As demonstrated, the Project would be substantially consistent with the General Plan, and impacts would be less than significant.

Table XI-2
Project Consistency with the General Plan

Policy	Consistency Discussion
LAND USE ELEMENT	
Objective LU.2: A compatible land use pattern	
Policy LU.2.1: Require that new development be visually and functionally compatible with existing residential neighborhoods and industrial and commercial areas.	**Consistent.** As discussed in response to Checklist Question I(c) (Aesthetics – Visual Quality), the Project Site is located in a highly urbanized area of the City near the Sepulveda Boulevard and Crenshaw Boulevard corridors, which are developed with a mix of commercial and residential uses. Land uses within the greater Project Site area include mixed commercial uses along Crenshaw Boulevard and Sepulveda Boulevard; residential neighborhoods; Charles H. Wilson Park; and schools including Ambassador High School, Shery High School, and Torrance Elementary School. The Project Site is currently developed with a 69,913-square-foot Los Angeles County DCFS office building and associated landscaping and surface parking. The Project includes demolition and removal of all existing improvements from the Project Site and development of the site with 272 residential dwelling units and associated landscaping, open space, and parking. The Project would be required to comply with Article 30 (Development Standards) of the City's Municipal Code). Additionally, the proposed uses are allowed under the existing Planned Development zoning for the Project Site, and the Project would meet all applicable zoning regulations. Thus, the Project would be visually and functionally compatible with surrounding uses.

Table XI-2
Project Consistency with the General Plan

Policy	Consistency Discussion
Policy LU.2.3: Consider both the impact of a proposed development on surrounding property and the impact of existing uses on new development.	**Consistent.** This IS/MND discloses the impacts of the Project on the environment, including surrounding properties. As the IS/MND concludes, with mitigation, the Project would not result in any significant environmental impacts. CEQA does not require an assessment of the environment, including existing uses, on the Project. However, land uses within the greater Project Site area include mixed commercial uses along Crenshaw Boulevard and Sepulveda Boulevard; residential neighborhoods; Charles H. Wilson Park; and schools including Ambassador High School, Shery High School, and Torrance Elementary School. These uses would not negatively affect the Project.
Policy LU.2.5: Establish landscape or hardscape buffers between residential and non-residential uses, where appropriate, to minimize adverse effects.	**Consistent.** The Project would be required to meet the City's landscaping requirements and would include hardscape buffers.
Policy LU.2.6: To the extent possible, preserve the balance between jobs and housing in Torrance through land use decisions.	**Consistent.** The Project would construct housing units near sources of employment shopping, and entertainment. Of the 272 proposed dwelling units, 28 of the units would be set aside for Very Low Income households. The Project would include 120 long-term bicycle parking spaces and 12 short-term parking spaces. The Project Site is in close proximity to transit, including Torrance Transit Lines 7 and 10. Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work and to shop. By developing new market-rate and affordable housing and facilitating alternatives to driving, the Project would contribute toward a jobs/housing balance.
Policy LU.2.7: Protect natural resources by promoting superior sustainable development.	**Consistent.** As an infill development in an urban area, the Project is a sustainable development by nature.
Objective LU.3: Planning decisions that recognize the unique characteristics, opportunities, and constraints of the City's diverse neighborhoods and districts while respecting private property rights	
Policy LU.3.1: Require new development to be consistent in scale, mass, and character with structures in the surrounding area. For distinct neighborhoods and districts, consider	**Consistent.** As discussed in response to Checklist Question I(c) (Aesthetics – Visual Quality), the Project Site is located in a highly urbanized area of the City near the Sepulveda

Table XI-2
Project Consistency with the General Plan

Policy	Consistency Discussion
developing design guidelines that suit their unique characteristics. Create guidelines that offer a wide spectrum of choices and that respect the right to develop within the context of existing regulations.	Boulevard and Crenshaw Boulevard corridors, which are developed with a mix of commercial and residential uses. Land uses within the greater Project Site area include mixed commercial uses along Crenshaw Boulevard and Sepulveda Boulevard; residential neighborhoods; Charles H. Wilson Park; and schools including Ambassador High School, Shery High School, and Torrance Elementary School. The Project Site is currently developed with a 69,913-square-foot Los Angeles County DCFS office building and associated landscaping and surface parking. The Project includes demolition and removal of all existing improvements from the Project Site and development of the site with 272 residential dwelling units and associated landscaping, open space, and parking. The Project would be required to comply with Article 30 (Development Standards) of the City's Municipal Code). Additionally, the proposed uses are allowed under the existing Planned Development zoning for the Project Site, and the Project would meet all applicable zoning regulations. Thus, the Project would be visually and functionally compatible with surrounding uses.
Objective LU.4: Land use development that complements the circulation and infrastructure network, meets the circulation demand of residents and businesses, and provides opportunities for non-automobile circulation	
Policy LU.4.2: Encourage the use of development design and amenities that support transit and other alternative forms of transportation, including bicycling and walking.	**Consistent.** The Project would construct housing units near sources of employment shopping, and entertainment. Of the 272 proposed dwelling units, 28 of the units would be set aside for Very Low Income households. The Project would include 120 long-term bicycle parking spaces and 12 short-term parking spaces. The Project Site is in close proximity to transit, including Torrance Transit Lines 7 and 10. Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work and to shop.
Policy LU.4.5: Ensure that residential parking requirements are adequate to relieve parking deficiencies in residential neighborhoods.	**Consistent**. The Project would provide parking in accordance with the City's parking requirements.

Table XI-2
Project Consistency with the General Plan

Policy	Consistency Discussion
Policy LU.4.6: Minimize individual lot access directly from arterial or major roadways and encourage reciprocal access between properties when feasible.	**Consistent.** The Project would maintain existing access to the Project Site from Crenshaw Boulevard and Sepulveda Boulevard and would not add any additional access from these roadways.
Objective LU.5: High-quality, attractive, residential neighborhoods	
Policy LU.5.1: Require that new residential development be visually and functionally consistent in scale, mass, and character with structures in the surrounding neighborhood. Encourage residential development that enhances the visual character, quality, and uniqueness of the City's neighborhoods and districts.	**Consistent.** As discussed in response to Checklist Question I(c) (Aesthetics – Visual Quality), the Project Site is located in a highly urbanized area of the City near the Sepulveda Boulevard and Crenshaw Boulevard corridors, which are developed with a mix of commercial and residential uses. Land uses within the greater Project Site area include mixed commercial uses along Crenshaw Boulevard and Sepulveda Boulevard; residential neighborhoods; Charles H. Wilson Park; and schools including Ambassador High School, Shery High School, and Torrance Elementary School. The Project Site is currently developed with a 69,913-square-foot Los Angeles County DCFS office building and associated landscaping and surface parking. The Project includes demolition and removal of all existing improvements from the Project Site and development of the site with 272 residential dwelling units and associated landscaping, open space, and parking. The Project would be required to comply with Article 30 (Development Standards) of the City's Municipal Code). Additionally, the proposed uses are allowed under the existing Planned Development zoning for the Project Site, and the Project would meet all applicable zoning regulations. Thus, the Project would be visually and functionally compatible with surrounding uses.
Policy LU.5.2: Require the provision of adequate private and common open space for residential units.	**Consistent.** The Project would be required to provide a minimum of 81,600 square feet of open space. The Project would include a total of 138,245 square feet of open space, exceeding the required amount by more than double, and would include courtyards, a hot spa, a pool, a flex deck, flex turfgrass, outdoor games, an outdoor kitchen, and private open space such as balconies and patios.

Table XI-2
Project Consistency with the General Plan

Policy	Consistency Discussion
Policy LU.5.5: Require that developers of housing consider and quantify the effects of new residential developments on local schools prior to development approval.	**Consistent.** As discussed in response to Checklist Question XV(c) (Public Services – Schools), impacts of the Project on school services have been accounted for in this document. As discussed therein, the Project would generate a total of approximately 79 students. It should be noted that it is possible that all or some of the estimated Project students could already live in the City with an existing demand for school services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for school services. Pursuant to California Government Code Section 65995, payment of the school fees established by the Torrance Unified School District (TUSD) in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Thus, the Project would not cause the need for new or altered school facilities, the construction of which could result in significant environmental impacts. Therefore, Project impacts on school services would be less than significant.
Policy LU.5.6: Strictly enforce City codes, including building and safety, zoning and land use regulations, and property maintenance codes, to maintain safe, high-quality residential neighborhoods.	**Consistent.** The Project would comply with all applicable City code requirements.
Policy LU.5.7: Ensure that the provision of housing is consistent with the goals and policies contained in the Housing Element.	**Consistent.** The Project includes 244 market-rate dwelling units and 28 affordable dwelling units and would help to meet the City's housing needs identified in the Housing Element.
Objective LU.11: Attractive, high-quality neighborhoods and commercial and industrial districts through the use of innovative design and architectural themes	
Policy LU.11.1: Encourage development which enhances the visual character, quality, and uniqueness of the City's neighborhoods and districts.	**Consistent.** As discussed in response to Checklist Question I(c) (Aesthetics – Visual Quality), the Project Site is located in a highly urbanized area of the City near the Sepulveda Boulevard and Crenshaw Boulevard corridors, which are developed with a mix of commercial and residential uses. Land uses within the

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Project Consistency with the General Plan

Policy	Consistency Discussion
	greater Project Site area include mixed commercial uses along Crenshaw Boulevard and Sepulveda Boulevard; residential neighborhoods; Charles H. Wilson Park; and schools including Ambassador High School, Shery High School, and Torrance Elementary School. The Project Site is currently developed with a 69,913-square-foot Los Angeles County DCFS office building and associated landscaping and surface parking. The Project includes demolition and removal of all existing improvements from the Project Site and development of the site with 272 residential dwelling units and associated landscaping, open space, and parking. The Project would be required to comply with Article 30 (Development Standards) of the City's Municipal Code). Additionally, the proposed uses are allowed under the existing Planned Development zoning for the Project Site, and the Project would meet all applicable zoning regulations. Thus, the Project would be visually and functionally compatible with surrounding uses.
Policy LU.11.7: Encourage the use of cohesive design elements that encourage movement of pedestrians, bicycles, and other non-automotive modes of transportation between distinct commercial establishments, between commercial and residential areas, and between residential areas, schools, recreational and cultural facilities, libraries, and transit corridors and hubs.	**Consistent.** The Project includes pedestrian pathways throughout the Project Site that connects to a sidewalk that encircles the site and connects to offsite sidewalks, which lead to Crenshaw Boulevard and Sepulveda Boulevard, sources of employment, shopping, and entertainment.
Policy LU.11.9: Require that development along the City's boundaries emphasize the qualities and uniqueness of Torrance by using attractive and cohesive design elements and architectural themes.	As discussed in response to Checklist Question I(c) (Aesthetics – Visual Quality), the Project Site is located in a highly urbanized area of the City near the Sepulveda Boulevard and Crenshaw Boulevard corridors, which are developed with a mix of commercial and residential uses. Land uses within the greater Project Site area include mixed commercial uses along Crenshaw Boulevard and Sepulveda Boulevard; residential neighborhoods; Charles H. Wilson Park; and schools including Ambassador High School, Shery High School, and Torrance Elementary School. The Project Site is currently

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Project Consistency with the General Plan

Policy	Consistency Discussion
	developed with a 69,913-square-foot Los Angeles County DCFS office building and associated landscaping and surface parking. The Project includes demolition and removal of all existing improvements from the Project Site and development of the site with 272 residential dwelling units and associated landscaping, open space, and parking. The Project would be required to comply with Article 30 (Development Standards) of the City's Municipal Code). Additionally, the proposed uses are allowed under the existing Planned Development zoning for the Project Site, and the Project would meet all applicable zoning regulations.
CIRCULATION AND INFRASTRUCTURE ELEMENT	
Objective CI.5: To meet the parking needs of businesses, residents, and visitors	
Policy CI.5.1: Require new development to accommodate project-generated parking demand on site.	**Consistent**. The Project would provide parking in accordance with the City's parking requirements, as modified by the State Density Bonus Law.
Objective CI.6: To enhance the visual quality of the City's roadway system and thereby contribute to a high-quality visual image of Torrance	
Policy CI.6.2: Provide for the consistent use of street trees along all sidewalks, parkways, and property frontages.	**Consistent.** As shown in Figure 3-33 in Section 3 (Project Description), the Project would include trees along sidewalks and Project Site frontages.
Objective CI.8: To maintain a comprehensive system of pedestrian pathways and bicycle routes that provide viable options to travel by automobile	
Policy CI.8.1: Provide and maintain safe, efficient, and convenient pedestrian pathways that offer access to major activity centers, recreation facilities, schools, community facilities, and transit stops.	**Consistent.** The Project includes pedestrian pathways throughout the Project Site that connects to a sidewalk that encircles the site and connects to offsite sidewalks, which lead to Crenshaw Boulevard and Sepulveda Boulevard, sources of employment, shopping, and entertainment.
Policy CI.8.2: Promote walking throughout the community by installing sidewalks where they are missing and making improvements to existing sidewalks when needed for safety purposes. Particular attention will be given to sidewalk improvements near schools and activity centers.	**Consistent.** The Project includes pedestrian pathways throughout the Project Site that connects to a sidewalk that encircles the site and connects to offsite sidewalks, which lead to Crenshaw Boulevard and Sepulveda Boulevard, sources of employment, shopping, and entertainment.
Policy CI.8.3: Require that new residential developments provide pedestrian gateways or	**Consistent.** The Project includes pedestrian pathways throughout the Project Site that connects to a sidewalk that encircles the site

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Project Consistency with the General Plan

Policy	Consistency Discussion
similar outlets to abutting roadways and sidewalks.	and connects to offsite sidewalks, which lead to Crenshaw Boulevard and Sepulveda Boulevard, sources of employment, shopping, and entertainment.
Policy CI.8.9: Promote the use of compact electric or similar powered vehicles for local trips.	**Consistent.** The Project would include 48 EV charging stations.
Objective CI.9: Infrastructure systems that support current and future development	
Policy CI.9.1: Require that developers, prior to issuance of building permits, demonstrate that adequate infrastructure exists or will be provided to serve proposed development and not diminish services to existing uses.	**Consistent.** As part of the permitting process, the Applicant would be required to confer with all applicable City department and utility provider to assess the Project's need for infrastructure, ability of existing infrastructure to accommodate the Project, and the degree to which improvements would be needed (if any). As discussed in response to Checklist Topic XIX (Utilities and Service Systems), the Project would upgrade the sewer infrastructure to accommodate the Project, and other existing utility infrastructure serving the Project Site has preliminarily been assessed to be adequate to accommodate the Project.
Policy CI.9.2: Evaluate the capacity and condition of the water, sewer, and storm drainage systems on a regular basis to assess each system's ability to meet changes in demand and to determine system deficiencies.	**Consistent.** As part of the permitting process, the Applicant would be required to confer with all applicable City department and utility provider to assess the Project's need for infrastructure, ability of existing infrastructure to accommodate the Project, and the degree to which improvements would be needed (if any). As discussed in response to Checklist Topic XIX (Utilities and Service Systems), the Project would upgrade the sewer infrastructure to accommodate the Project, and other existing utility infrastructure serving the Project Site has preliminarily been assessed to be adequate to accommodate the Project.
Policy CI.9.3: Ensure that public infrastructure is upgraded and installed in a timely manner to meet usage requirements, maximize cost efficiency, and minimize construction impacts on the community.	**Consistent.** As part of the permitting process, the Applicant would be required to confer with all applicable City department and utility provider to assess the Project's need for infrastructure, ability of existing infrastructure to accommodate the Project, and the degree to which improvements would be needed (if any). As discussed in response to Checklist

Table XI-2
Project Consistency with the General Plan

Policy	Consistency Discussion
	Topic XIX (Utilities and Service Systems), the Project would upgrade the sewer infrastructure to accommodate the Project, and other existing utility infrastructure serving the Project Site has preliminarily been assessed to be adequate to accommodate the Project. All infrastructure needed for the Project would be installed during the Project's construction phase.
Policy CI.9.4: Require that new development assume the full fair-share costs of construction and expansion of water, sewer, and storm drain system improvements necessitated by that development.	**Consistent.** As part of the permitting process, the Applicant would be required to confer with all applicable City department and utility provider to assess the Project's need for infrastructure, ability of existing infrastructure to accommodate the Project, and the degree to which improvements would be needed (if any). As discussed in response to Checklist Topic XIX (Utilities and Service Systems), the Project would upgrade the sewer infrastructure to accommodate the Project, and other existing utility infrastructure serving the Project Site has preliminarily been assessed to be adequate to accommodate the Project. The Applicant would be required by the City to pay a fair-share cost for any utility upgrades.
Policy CI.9.5: Require that private infrastructure be built to public standards, including water lines, sewers, storm drains, and paving materials, and that private maintenance programs comply with City standards and schedules.	**Consistent.** The Project would be required to build all infrastructure in accordance with City standards.
Policy CI.9.7: Pursue the undergrounding of overhead utilities.	**Consistent.** The Project would not include any overhead utilities.
Policy CI.9.9: Require that developers address the City's Total Maximum Daily Load as required by a project's watershed.	**Consistent.** As discussed in response to Checklist Question X(a) (Hydrology and Water Quality – Water Quality), the Project would be required to comply with the water quality standards outlined in the County's LID Manual, which includes identification of downstream contaminants and implementation of appropriate BMPs.
COMMUNITY RESOURCES ELEMENT	
Objective CR.1: To utilize open space as a means of achieving desirable growth patterns	
Policy CR.1.2: Require the provision of on-site open space in new developments.	The Project would be required to provide a minimum of 81,600 square feet of open space.

Table XI-2
Project Consistency with the General Plan

Policy	Consistency Discussion
	The Project would include a total of 138,245 square feet of open space, exceeding the required amount by more than double, and would include courtyards, a hot spa, a pool, a flex deck, flex turfgrass, outdoor games, an outdoor kitchen, and private open space such as balconies and patios.
Policy CR.1.3: Require that development projects involving modifications or additions include plans to upgrade or add open space and landscaping.	The Project would be required to provide a minimum of 81,600 square feet of open space. The Project would include a total of 138,245 square feet of open space, exceeding the required amount by more than double, and would include courtyards, a hot spa, a pool, a flex deck, flex turfgrass, outdoor games, an outdoor kitchen, and private open space such as balconies and patios.
Objective CR.4: To create and maintain open space as an aesthetic enhancement within the urban environment	
Policy CR.4.2: Require that developers and property owners improve their properties by providing landscaping and similar aesthetic treatments along roadways.	**Consistent.** As shown in Figure 3-33 in Section 3 (Project Description), the Project would include trees along sidewalks and Project Site frontages.
Policy CR.4.3: Encourage planting of new trees, and preserve existing street trees in residential neighborhoods.	**Consistent.** The Project would incorporate a total of 122 trees in the Projects landscaping, including along sidewalks and Project Site frontages.
Objective CR.6: To provide superior park and recreation facilities consistent with established City standards	
Policy CR.6.3: Require developers to dedicate land or pay sufficient in-lieu fees to meet established public recreational open space standards.	**Consistent.** The Project would include 138,245 square feet of open space. In addition to the onsite open space, the Project would be required to pay park and recreation in-lieu fees and Community Services Fees as part of the City DIFs.
Objective CR.13: To contribute to the improvement of local and regional ambient air quality to benefit the health of all	
Policy CR.13.5: Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling.	**Consistent.** The Project would construct housing units near sources of employment shopping, and entertainment. Of the 272 proposed dwelling units, 28 of the units would be set aside for Very Low Income households. The Project would include 120 long-term bicycle parking spaces and 12 short-term parking spaces. The Project Site is in close proximity to transit, including Torrance Transit Lines 7 and 10. Given the urban nature of the

Table XI-2
Project Consistency with the General Plan

Policy	Consistency Discussion
	Project Site area, Project residents would be able to walk and bike to work and to shop as an alternative to driving, thereby reducing pollutant emissions and conserving energy.
Policy CR.13.7: Encourage the use of alternative fuel vehicles and re-refined oil.	**Consistent.** The Project supports this policy by providing 48 EV charging stations.
Policy CR.13.8: Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality.	**Consistent.** As demonstrated in response to Checklist Question III(b) (Air Quality – Pollutant Emissions), the construction and operation of the Project would not produce pollutant emissions in excess of SCAQMD's significance thresholds.
Objective CR.14: To reduce the City's overall carbon footprint and counteract the effects of global warming through a reduction in the emissions of greenhouse gases within Torrance	
Policy CR.14.1: Support the California Air Resources Board in its ongoing plans to implement AB32, and fully follow any new AB32-related regulations.	**Consistent.** As discussed in response to Checklist Topic VII (Greenhouse Gas Emissions), the Project would be consistent with the 2022 Scoping Plan.
Objective CR.15: A water supply sufficient to meet present and future needs	
Policy CR.15.4: Encourage residents and businesses in Torrance to practice water conservation through incentive programs and where necessary programs that penalize wasteful practices.	**Consistent.** The Project would comply with water conservation measures identified in the State's Green Building Code Standards.
Policy CR.15.5: Enforce regulations aimed at reducing groundwater and urban runoff pollution, including the National Pollutant Discharge Elimination System (NPDES) requirements of the Regional Water Quality Control Board.	**Consistent.** As discussed in response to Checklist Question X(a) (Hydrology and Water Quality – Water Quality), the Project would be required to comply with the water quality standards outlined in the County's LID Manual, including implementation of appropriate BMPs.
Policy CR.15.6: Reduce the amount of water used for landscaping through such practices as the planting of native and drought-tolerant plants, use of efficient irrigation systems, and collection and recycling of runoff.	**Consistent.** The Project would use drip irrigation and native/drought-tolerant landscaping to minimize the use of water for landscaping.
Policy CR.15.10: Promote implementation of effective water conservation and water demand management measures including Best Management Practices.	**Consistent.** As discussed in response to Checklist Question X(a) (Hydrology and Water Quality – Water Quality), the Project would be required to comply with the water quality standards outlined in the County's LID Manual, including implementation of appropriate BMPs.

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Project Consistency with the General Plan

Policy	Consistency Discussion
Objective CR.18: To preserve significant stands of trees and to establish a comprehensive plan to protect and enhance the urban forest	
Policy CR.18.1: Preserve specimen trees whether they occur on public or private property, and promote the planting of new trees.	**Consistent.** The Project Site does not contain any "specimen trees." Additionally, a total of 122 trees would be incorporated into the Project's landscaping.
Policy CR.18.2: Provide, maintain, and encourage appropriate street trees along all sidewalks and property frontages.	**Consistent.** The Project would incorporate a total of 122 trees in the Projects landscaping, including along sidewalks and Project Site frontages.
Objective CR.21: The efficient use and conservation of energy resources to reduce consumption of natural resources and fossil fuels	
Policy CR.21.1: Promote and encourage energy resource conservation by the public sector, private sector, and local school district.	**Consistent.** The Project would be required to comply with energy conservation measures outlined in the State's Green Building Code Standards.
NOISE ELEMENT	
Objective N.1: To identify noise pollution and establish effective noise abatement methods	
Policy N.1.1: Continue to strictly enforce the provisions of the City's Noise Ordinance to ensure that stationary noise, traffic-related noise, railroad noise, airport-related noise, and noise emanating from construction activities and special events are minimized.	**Consistent.** As discussed in response to Checklist Question XIII(a) (Noise – Substantial Increase in Noise), the Project would comply with the City's Noise Ordinance.
Policy N.1.4: Minimize unnecessary outdoor noise through enforcement of the noise ordinance and through permit processes that regulate noise-producing activities.	**Consistent.** As discussed in response to Checklist Question XIII(a) (Noise – Substantial Increase in Noise), the Project would comply with the City's Noise Ordinance.
Objective N.2: To minimize transportation-related noise impacts	
Policy N.2.3: Require developers and business owners to minimize noise impacts associated with on-site motor vehicle activity through the use of noise-reduction features (e.g., berms, walls, well-designed site plans).	**Consistent.** As discussed in response to Checklist Question XIII(a) (Noise – Substantial Increase in Noise), the Project would not result in any significant noise impacts related to onsite vehicle noise.
Objective N.3: To minimize noise incompatibilities between land uses	
Policy N.3.2: Require the inclusion of noise-reducing design features for developments near noise-sensitive land uses.	**Consistent.** As discussed in response to Checklist Question XIII(a) (Noise – Substantial Increase in Noise), to ensure that the Project would not result in a significant construction noise impacts, the Project would be required to install a temporary noise barrier along a portion of the Project Site during Project Construction. Operation of the Project would not result in any significant noise impacts, and

Table XI-2
Project Consistency with the General Plan

Policy	Consistency Discussion
	no noise-reducing design features would be required.
Source: City of Torrance General Plan, Noise Element, April 6, 2010.	

Cumulative Impacts

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Site. The City would assess the consistency of the related project identified in Appendix A with all applicable plans, policies, and regulations associated with the related project, individually. Regardless of any potential inconsistencies the related project may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a) Would the project 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?

No Impact. According to the Community Resources Element of the City's General Plan, the Project Site is located within MRZ-3, which is classified as an area where "the significance of mineral deposits cannot be determined from the available data."[48] Additionally, the Project Site is not located within a designated oil production area.[49] There are no known mineral resources on the Project Site or in the vicinity. Thus, the Project would not 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. Therefore, no impacts related to issue would occur.

b) Would the project 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?

No Impact. The Project Site is located in an urbanized part of the City. The Project Site is not identified as a mineral resource recovery site. Thus, the Project would not 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. Therefore, no impacts related to issue would occur.

Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to

48 *City of Torrance General Plan, Community Resources Element, Figure CR-5.*
49 *Ibid.*

mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip 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?	☐	☐	☐	☒

The information and analysis presented in this section is based primarily on the following (refer to Appendix H):

- *Noise Report, NTEC, July 2023.*

Environmental Setting

Fundamentals of Sound and Environmental Noise

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. Table XIII-1 provides examples of A-weighted noise levels from common sources. Although the terms "sound" and "noise" are often used synonymously, noise is commonly defined as sound that is either loud, unpleasant, unexpected, or undesired.[50] Because decibels are logarithmic units, they cannot be simply added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

[50] *California Department of Transportation (Caltrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*

Table XIII-1
A-Weighted Decibel Scale

Common Noise Sources	Sound Level, dBA
Near Jet Engine	130
Rock and Roll Band	110
Jet Flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
These noise levels are approximations intended for general reference and informational use. They do not meet the standard required for detailed noise analysis but are provided for the reader to gain a rudimentary concept of various noise levels. *Source: Cowan, James P., Handbook of Environmental Acoustics, 1993*	

Noise Definitions

This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}), minimum noise level (L_{mix}), and Community Noise Equivalent Level (CNEL). Statistical descriptors (L_x) are also discussed.

Equivalent Noise Level (L_{eq})

L_{eq} represents the equivalent steady-state noise level for a stated period of time that would contain the same acoustic energy as the fluctuating, time-varying noise level of that same period. For example, the L_{eq} for one hour is the energy average noise level for that hour. L_{eq} can be thought of as a continuous noise level for a certain period that is equivalent in acoustic energy content to a fluctuating noise level of that same period. In this analysis, L_{eq} is expressed in units of dBA.

Maximum Noise Level (L_{max})

L_{max} represents the highest instantaneous noise level of a specified time period.

Minimum Noise Level (L_{mix})

L_{min} represents the lowest instantaneous noise level of a specified time period.

Community Noise Equivalent Level (CNEL)

CNEL is a weighted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL penalizes evening noise levels between 7:00 P.M. and 10:00 P.M. by an additional 5 dBA and nighttime noise levels between 10:00 P.M. and 7:00 A.M. by an additional 10 dBA. Because of this, 24-hour CNEL figures are always higher than their corresponding 24-hour L_{eq}.

Statistical Descriptor (L_x)

L_x is used to represent the noise level exceeded *X*% of a specified time period. For example, L_{90} represents the noise level that is exceeded 90% of a specified time period. L_{90} is commonly used to represent ambient or background steady-state noise levels.[51]

Effects of Environmental Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses may include the intensity, frequency, and pattern of noise; the amount of background or existing noise present; and the nature of work or human activity that is exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous and repeated exposure, are unlikely to cause hearing loss.[52] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[53]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels should not exceed 30 dBA L_{eq} and that individual noise events of 45 dBA or higher be limited.[54]

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA L_{eq} or greater and cardiovascular effects,

51 *Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*
52 *National Institute of Health, National Institute on Deafness and Other Communication. www.nidcd.nih.gov/health/noise-induced-hearing-loss.*
53 *World Health Organization, Guidelines for Community Noise, 1999.*
54 *Ibid.*

including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

It is generally accepted that people with normal hearing sensitivity can barely perceive a 3 dBA change in noise levels, though if changes occur to the character of a sound (i.e., changes to the frequency content), then changes less than 3 dBA may be more noticeable.[55] Changes of 5 dBA may be readily perceptible, and changes of 10 dBA are perceived as a doubling in loudness.[56] However, few people are highly annoyed by daytime noise levels below 55 dBA.[57]

Loud noises, such as those from construction activities, can interfere with peoples' abilities to effectively communicate via speech, as well as other activities, resulting in annoyance or inconvenience. The EPA has found that a home interior noise level of 45 dBA L_{eq} generally protects speech and communication by providing 100% intelligibility of speech sounds.[58] Other common daily activities that may be disrupted by elevated interior noise levels include watching television, listening to music, or activities requiring concentration (such as reading). The EPA has determined that, given the preservation of an indoor noise level associated with 100% speech intelligibility (i.e., 45 dBA L_{eq}), the average community reaction is not evident and "7 dBA below levels associated with significant complaints and threats of legal action." Any complaints and annoyance are dependent on "attitude and other non-level related factors."

Noise Attenuation

Generally speaking, noise levels decrease, or "attenuate," as distances from noise sources to receivers increase. For each doubling of distance, noise from stationary or small, localized sources, commonly referred to as "point sources," may attenuate at a rate of 6 dBA for each doubling of distance. This attenuation is referred to as the inverse square law. For example, if a point source emits a noise level of 80 dBA at a reference distance of 50 feet its noise level would be approximately 74 dBA at a distance of 100 feet, 68 dBA at a distance of 200 feet, etc. Noise emitted by "line" sources, such as highways, attenuates at the rate of 3 dBA for each doubling of distance.[59]

Factors such as ground absorption and atmospheric effects may also affect the propagation of noise. In particular, ground attenuation by non-reflective surfaces such as soft dirt or grass may contribute to increased attenuation rates of up to an additional 8-10 dBA per doubling of distance.[60]

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55 *Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*
56 *Ibid.*
57 *World Health Organization, Guidelines for Community Noise, 1999.*
58 *EPA, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety, 1974.*
59 *Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, April 2020.*
60 *Ibid.*

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between a noise source and a receiver. Barriers that break the line of sight between noise sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. Barriers can reduce source noise levels by up to 20 dBA, though it is generally infeasible for temporary barriers to reduce source noise levels by more than 15 dBA.[61] In cases where the noise path from source to receiver is direct but grazes the top of a barrier, noise attenuation of up to 5 dBA may still occur.[62]

Fundamentals of Vibration

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, and acceleration.[63] Unlike noise, vibration is not a common environmental issue, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration may include trains, construction activities, and certain industrial operations.

Vibration Definitions

This analysis discusses vibration in terms of Peak Particle Velocity (PPV):

Peak Particle Velocity (PPV)

PPV is commonly used to describe and quantify vibration impacts on buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are generally measured in inches per second (in/sec).[64]

Effects of Vibration

High levels of vibration may cause damage to buildings or even physical personal injury. However, vibration levels rarely affect human health outside the personal operation of certain construction equipment or industrial tools. Instead, most people consider environmental vibration to be an annoyance that may affect concentration or disturb sleep. Background vibration in residential areas is usually not perceptible, and perceptible indoor vibrations are generally caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Vibration from traffic on smooth roadways is rarely perceptible, even from larger vehicles such as buses or trucks.[65] The threshold of human perception of vibration is approximately 0.01-0.02 in/sec PPV.[66]

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61 *Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, April 2020.*
62 *Ibid.*
63 *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.*
64 *Ibid.*
65 *Caltrans, Transportation and Construction Vibration Guidance Manual, April 2020.*
66 *Ibid.*

Regulatory Framework

Federal

Currently, no federal noise standards regulate environmental noise associated with temporary construction activities or the long-term operations of development projects. As such, both temporary and long-term noise impacts resultant from the Project would be largely regulated or otherwise evaluated by state and City standards designed to protect public well-being and health.

State

2017 General Plan Guidelines

The State of California's 2017 General Plan Guidelines propose county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. The State's suggested compatibility considerations between various land uses and exterior noise levels are not regulatory in nature, but are recommendations intended to aid communities in determining their own noise-acceptability standards.

City

2009 General Plan

The City of Torrance General Plan, adopted in April 2010, contains a Noise Element that includes objectives and policies intended to protect existing and planned land uses from excessive noise.[67] The following objectives and policies are relevant to the Project:

Objective N.1: To identify noise pollution and establish effective noise abatement methods.

Policy N.1.1: Continue to strictly enforce the provisions of the City's Noise Ordinance to ensure that stationary noise, traffic-related noise, railroad noise, airport-related noise, and noise emanating from construction activities and special events are minimized.

Objective N.2: To minimize transportation-related noise impacts.

Policy N.2.3: Require developers and business owners to minimize noise impacts associated with on-site motor vehicle activity through the use of noise-reduction features (e.g., berms, walls, well-designed site plans).

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67 *City of Torrance, 2009 General Plan, April 2010.*

Objective N.3: To minimize noise incompatibilities between land uses.

Policy N.3.1: Review industrial, commercial, or other noise-generating land use proposals for compatibility with nearby noise-sensitive land uses, and require that appropriate mitigation be provided.

Policy N.3.2: Require the inclusion of noise-reducing design features for developments near noise-sensitive land uses.

Policy N.3.3: Encourage dense, attractive landscape planting along roadways and adjacent to other noise sources to increase absorption of noise.

The Noise Element identifies schools, hospitals, churches, and residential neighborhoods as noise-sensitive receptors.

The Noise Element also contains "Noise/Land Use Compatibility Guidelines" that define the City's noise standards for land use compatibility in the planning process. The guidelines are intended to determine whether a new use is appropriate within a given noise environment. These guidelines are shown in Table XIII-2.

The Noise Element contains no CEQA-specific thresholds of significance or other quantitative standards that would apply to CEQA analysis of the Project's noise and vibration impacts.

City of Torrance Municipal Code

The City of Torrance Municipal Code (TMC) contains a number of noise limits and other regulations that would apply to the Project.

Section 46.7.2, "Noise Limits," establishes general noise limits for various regions and land uses in the City. The generation of noise in excess of these limits, with some exceptions, is prohibited. The Project and every noise receptor addressed in this report are located in Region 4, meaning that the noise limits shown in Table XIII-3 would apply.

Table XIII-2
City of Torrance General Plan Noise Element –
Noise/Land Use Compatibility Guidelines

Property Receiving Noise	Maximum Noise Level L_{dn} or CNEL, dBA	
	Interior	Exterior
Residential		
Low Density Residential Low Medium Density Residential Medium Density Residential	45	60/65[A]
Medium High Density Residential	45	65/70[B]
High Density Residential	45	70[A]
Commercial and Office		
General Commercial Commercial Center	N/A	70
Residential Office	50	70
Industrial		
Business Park Light Industrial Heavy Industrial	55	75
Public and Medical Uses		
Public/Quasi-Public/Open Space	50	65
Hospital/Medical	50	70
Airport		
Airport	N/A	70

[A] The normally acceptable standard is 60 dBA. The higher standard is acceptable subject to inclusion of noise-reduction features in project design and construction.
[B] Maximum exterior noise levels up to 70 dB CNEL are allowed for Multiple-Family Housing.
[C] Regarding aircraft-related noise, the maximum acceptable exposure for new residential development

Source: City of Torrance General Plan Noise Element, Table N-3.

Table XIII-3
TMC Section 46.7.2 – Noise Limits

Region	Noise Level, dBA	
	Day (7:00 A.M. – 10:00 P.M.)	Night (10:00 P.M. – 7:00 A.M.)
4	55	50
Source: TMC Section 46.7.2.		

Section 46.3.1, "Construction of Buildings and Projects," prohibits the usage of construction equipment in or adjacent to residential areas that creates noise in excess of 50 dBA, as measured at property lines, except between the hours of 7:30 A.M. to 6:00

P.M. Monday through Friday, and 9:00 A.M. to 5:00 P.M. on Saturdays. Construction is prohibited on Sundays and holidays observed by the City.

Section 46.2.6, "Machinery, Equipment, Fans and Air Conditioning," applies to mechanical sources such as pumps, fans, air conditioning units, and other machinery. It prohibits these sources from increasing ambient noise levels at receiving residential property lines by greater than 5 dBA.

Federal Transit Administration

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable federal, County, or City standards specific to temporary construction activities.

Though not regulatory in nature, the FTA has established vibration impact criteria for buildings and other structures, as building and structural damages are generally the foremost concern when evaluating the impacts of construction-related vibrations. Table XIII-4 shows the FTA's vibration criteria for building and structural damage.

Table XIII-4
FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.	

Existing Conditions

Project Site

The Project Site is currently improved with a one-story, 63,875-square-foot commercial office building that is occupied by the Los Angeles County Department of Children and Family Services. The Project Site also includes a surface parking lot containing 347 vehicle parking spaces in support of this use. During a noise measurement study at the Project Site, this use was not observed to be a substantial contributor to existing ambient noise conditions. The use likely contributes nominally to existing ambient noise levels from mobile sources such as vehicles circulating within the parking lot and stationary sources such as HVAC equipment.

Noise-Sensitive Receptors

Representative noise-sensitive receptors in the vicinity of the Project Site include the following:

- Woodbury Drive Residences: This receptor consists of single-family residences located along Woodbury Drive, directly north of the Project Site.
- La Terrazza Residences: This receptor consists of residences located directly west of the Project Site that are part of the La Terrazza residential complex.
- Tradewinds Residences: This multi-family residential building is located at 2605 Sepulveda Boulevard, approximately 185 feet south of the Project Site.

Other noise-sensitive receptors are located at much greater distances from the Project and would reasonably experience less than significant impacts due to construction and operations of the Project. For example, the nearest school land use, Ambassador High School (2300 Crenshaw Boulevard), is located approximately 800 feet east of the Project Site, across Crenshaw Boulevard.

The Project would also require off-site sewer improvements to be made along a segment of Crenshaw Boulevard between approximately 230th Street and 233rd Street. Noise-sensitive single-family residences located along Crenshaw Boulevard would be directly adjacent to construction activities performed as part of the sewer improvements.

A map showing the location of the Project and nearby noise-sensitive receptors is included in Appendix H.

Existing Ambient Noise Conditions

On July 28, 2023, noise measurements were obtained at multiple locations near the Project to aid in the characterization of daytime ambient noise conditions surrounding the Project and nearby sensitive receptors. At all locations, the primary source of noise was vehicular traffic along Crenshaw Boulevard and Sepulveda Boulevard. Noise from vehicles circulating within the Project Site's parking lot and other adjacent parking lots had a minor effect on ambient noise levels surrounding the Project Site. The measured noise levels are shown in Table XIII-5.

Noise contours developed for the City's General Plan are generally consistent with these measured ambient noise levels. For example, the General Plan identifies that noise levels at the Project Site are approximately 60 dBA CNEL or lower (depending on distances from Crenshaw Boulevard and Sepulveda Boulevard), which is consistent with measurements taken near Tradewinds Residences, La Terrazza Residences, and Woodbury Drive Residences. The General Plan also indicates that noise levels along

Crenshaw Boulevard may exceed 70 dBA CNEL, which is consistent with the measurement taken near the intersection of Crenshaw Boulevard and 230th Street.

Table XIII-5
Existing Ambient Noise Levels

Noise Measurement Location	Sound Level (dBA L_{eq})
1. Near Tradewinds Residences	63.8
2. West Project Site boundary, near La Terrazza Residences	52.8
3. North Project Site boundary, near Woodbury Drive Residences	57.8
4. Near intersection of Crenshaw Boulevard and 230th Street	75.4
Source: NTEC, 2023.	

Project Impacts

a) Would the Project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated. As discussed in detail below, the Project could generate construction noise levels in excess of the City's significance threshold. However, with implementation of Mitigation Measure NOISE-1, the Project's construction-related noise impact would be less than significant. The Project's operational noise level would not exceed the City's significance threshold, and no additional mitigation measures are required.

Construction Noise

For the purposes of this analysis, a significant impact would occur if construction activities would generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The City has not adopted construction-related noise thresholds of significance for CEQA consideration. The City's General Plan also does not contain quantitative noise standards that are specific or applicable to construction activities. Section 46.3.1 of the TMC establishes a 50 dBA noise limit for nighttime construction but does not establish a standard for daytime construction. Section 46.7.2 of the TMC establishes a 55 dBA daytime noise limit for residential land uses in Region 4, which would apply to the noise-sensitive receptors addressed in this analysis. From a CEQA standpoint, this regulatory framework does not adequately meet the

requirements of a threshold by which a determination of significance may be evaluated. For example, daytime ambient noise levels at single-family residences along Crenshaw Boulevard exceed 75 dBA L_{eq}, yet the City's daytime noise limit for these residences is just 55 dBA L_{eq}. A noise level that is 56 dBA L_{eq} would reasonably have no effect on ambient noise levels at these single-family residences but would nevertheless be in exceedance of the 55 dBA L_{eq} noise limit. Thus, Section 46.7.2's 55 dBA L_{eq} daytime noise limit does not adequately assess the potential for noise impacts to result in significant environmental impacts pursuant to CEQA. As such, the following analysis addresses the potential for construction noise levels to exceed Section 46.7.2's 55 dBA L_{eq} noise limit but adopts the additional criteria, shown below, to assist in gauging the environmental significance of the Project's construction noise levels. The Project's construction noise impact would be considered significant if any of the following were to occur:

- Construction activities occurring outside the hours of 7:30 A.M. and 6:00 P.M. Monday through Friday or 9:00 A.M. and 5:00 P.M. on Saturday would exceed 50 dBA L_{eq}, as measured at the property lines of residential land uses.

- Construction activities occurring on Sundays or holidays observed by the City.

- Construction activities occurring between 7:30 A.M. and 6:00 P.M. Monday through Friday or between 9:00 A.M. and 5:00 P.M. on Saturday (excluding holidays observed by the City) would cause existing ambient exterior noise levels at noise-sensitive uses to increase by greater than 5 dBA L_{eq}. The averaging period shall be equivalent to the duration of a single workday, from start to finish of that day's construction activities.

Conservatively, the substantial noise increase established by the third criterion approximates a readily apparent increase in ambient noise.

Construction of the Project would generate noise during the approximately 30 months of grading, building construction, and other related construction activities, including those related to the proposed off-site sewer improvements. The Project is anticipated to utilize a five-day work week, and work on federal holidays would not occur. Daily construction hours would be between 7:30 A.M. and 6:00 P.M. As a result, construction of the Project would not conflict with the noise limits and restrictions established by TMC Section 46.3.1 and corresponding threshold criteria.

Grading (On-Site)

Noise from grading activities is typically the foremost concern when evaluating a project's construction noise impact, as grading activities often require extensive use of heavy-duty, diesel-powered earthmoving equipment. Given this consideration, the following analysis assesses noise impacts that may result from the Project's grading phase.

Grading for the Project is anticipated to last approximately four months. The majority of the Project's grading would be characterized by excavators excavating an estimated 103,400 cubic yards of soil for construction of the Project's subterranean levels, foundations, and trenching. As excavators work across the 5.5-acre Project Site, their construction noise levels at surrounding noise-sensitive receptors would fluctuate depending on the vehicles' distances from them. Noise levels would be greater when excavators are in proximity of noise-sensitive receptors and lower when positioned farther away. Given these considerations, noise impacts associated with the Project's grading activities have been evaluated by modeling noise levels that would be associated with two excavators grading a one-acre parcel of land in proximity to nearby noise-sensitive receptors.

Table XIII-6 shows the estimated noise increases that would result from the Project's grading activities at nearby sensitive receptors. As shown, grading-related noise increases at La Terrazza Residences and Woodbury Drive Residences would exceed the 5 dBA L_{eq} threshold of significance adopted by this analysis. Also of note, construction noise levels at each noise-sensitive receptor would exceed the 55 dBA L_{eq} daytime noise limit established by TMC Section 46.7.2. Therefore, without mitigation, the Project's construction noise impacts from grading activities would be potentially significant. However, as discussed below, with implementation of Mitigation Measure NOISE-1, this impact would be less than significant.

Table XIII-6
Construction Noise Levels – Grading (Unmitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
La Terrazza Residences	67.5	52.8	67.7	14.9
Woodbury Drive Residences	69.7	57.8	70.0	12.2
Tradewinds Residences	60.6	63.8	65.5	1.7
Source: NTEC, 2023.				

Trenching and Backfilling (Off-Site)

The greatest noise impacts associated with construction of the Project's off-site sewer improvements would be related to trenching and backfilling for the sewer line. Trenching and backfilling would last approximately four months and would involve earthmoving vehicles such as an excavator and loaders excavating and later backfilling the sewer line's trench. Over these four months, trenching and backfilling activities would occur along the approximately 1,200-foot segment of sewer line improvements, but daily

activities could occur from relatively fixed locations. Given these considerations, noise impacts associated with the Project's off-site trenching and backfilling activities have been evaluated by modeling noise levels that would be associated with an excavator and a loader operating at minimum distances to roadside noise-sensitive residential receptors.

Table XIII-7 shows the estimated noise increase that would result from the Project's off-site trenching and backfilling activities at residences located along Crenshaw Boulevard. As shown, due largely to high existing noise levels along Crenshaw Boulevard, trenching and backfilling-related noise increases at residences along Crenshaw Boulevard would be nominal and below the 5 dBA L_{eq} threshold of significance adopted by this analysis. Also, construction noise levels (independent of ambient noise levels) at these residences would be below the 55 dBA L_{eq} daytime noise limit established by TMC Section 46.7.2. Therefore, the Project's noise impacts from trenching and backfilling activities related to off-site sewer improvements would be less than significant.

Table XIII-7
Construction Noise Levels – Off-Site Trenching and Backfilling

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
Crenshaw Boulevard Residences	52.5	75.4	75.4	<0.1
Source: NTEC, 2023.				

Mitigation Measures

To ensure that the Project's construction-related noise increases at noise-sensitive receptors do not exceed the adopted thresholds of significance, the following mitigation measure is required:

NOISE-1: For construction activities occurring at the main Project Site (not activities related to the off-site sewer improvements), sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project's construction boundaries facing La Terrazza Residences, Woodbury Drive Residences, and Tradewinds Residences to shield these receptors from on-site construction noise activities. Sound barriers facing La Terrazza Residences and Woodbury Drive Residences shall be at least 25 feet tall; sound barriers facing Tradewinds Residenes shall be at least 20 feet tall. The prescribed sound barriers shall be installed prior to the commencement of demolition and grading activities and shall remain in place until the Project has reached "dry-in" status.

Table XIII-8 shows the estimated noise increases that would occur at La Terrazza Residences, Woodbury Drive Residences, and Tradewinds Residences after

implementation of Mitigation Measure NOISE-1. As shown, implementation of noise barriers pursuant to Mitigation Measure NOISE-1 would ensure that grading-related noise increases at these noise-sensitive receptors are below the 5 dBA L_{eq} threshold of significance adopted by this analysis. Further, they would also ensure that construction noise levels (irrespective of ambient noise levels) at these receptors are below the 55 dBA L_{eq} daytime noise limit established by TMC Section 46.7.2. As a result, with mitigation, the Project's grading-related noise impacts would be less than significant. Noise impacts from other construction phases would be less than the grading-related noise levels assessed by this analysis and therefore less than significant, as well.

Table XIII-8
Construction Noise Levels – Grading (Mitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
La Terrazza Residences	52.5	52.8	55.7	2.9
Woodbury Drive Residences	54.7	57.8	59.5	1.7
Tradewinds Residences	45.6	63.8	63.9	0.1
Source: NTEC, 2023.				

Construction Trucks

Trucks and other construction-related vehicles would access the Project Site over the course of all construction phases. The Project's maximum daily construction truck trip generation would occur during its grading phase when up to 152 one-way haul truck trips (76 inbound and 76 outbound trips) would service the Project Site for the removal of excavation spoils. This correlates with an average of approximately 26 one-way trips per hour (13 inbound and 13 outbound trips), assuming a six-hour daily hauling period. This truck trip generation would have a marginal effect on roadside noise levels along Sepulveda Boulevard and Crenshaw Boulevard, which would be utilized as haul routes to access regional freeways such as I-405 and I-110. Sepulveda Boulevard and Crenshaw Boulevard are major arterial roadways with daytime noise levels in excess of 70 dBA L_{eq}. According to FHWA TNM 2.5 modeling, a maximum of 26 one-way trips per hour would generate roadside noise levels of just 60.9 dBA L_{eq}. Consequently, impacts to roadside ambient noise levels along Sepulveda Boulevard and Crenshaw Boulevard would be nominal and less than a 1 dBA L_{eq} increase, below the 5 dBA L_{eq} threshold of significance adopted by this analysis.[68] Other construction phases would result in fewer

68 *The noise limits established by TMC Section 46.7.2 do not apply to noise levels from traffic on public roads.*

truck trips and therefore reduced noise impacts. As a result, the Project's noise impact from construction truck trips would be less than significant.

Operational Noise

Operational Noise Thresholds

For purposes of this analysis, a significant impact would occur if the proposed project's on or off-site noise sources would generate a substantial permanent increase in ambient noise levels surrounding the proposed project and any nearby land uses. The City has not adopted operations-related thresholds of significance for CEQA consideration. The General Plan instructs that noise impacts from proposed land uses should be assessed utilizing the noise/land use compatibility guidelines shown in Table XIII-2, but it does not contain instructions on how these standards may be applied to analysis under CEQA. Section 46.2.6 of the TMC establishes a 5 dBA ambient noise increase limit for mechanical sources. TMC Section 46.7.2 establishes 55 dBA L_{eq} daytime and 50 dBA L_{eq} nighttime noise limits for residential land uses in Region 4, which would apply to the noise-sensitive receptors addressed in this analysis. The following criteria to determine significance have been adopted in consideration of these noise standards. The Project's operational noise impact would be considered significant if any of the following were to occur:

- Project operations would cause ambient noise levels at noise-sensitive residential land uses to exceed 55 dBA L_{eq} during daytime hours between 7:00 A.M. and 10:00 P.M. or 50 dBA L_{eq} during nighttime hours between 10:00 P.M. and 7:00 A.M.

- Project operations, from any source or combination of sources, would cause ambient noise levels at noise-sensitive residential land uses to increase by greater than 5 dBA L_{eq}.

On-Site Operational Noise

The Project's potential on-site operational noise sources are identified and discussed below.

<u>Mechanical Equipment</u>

Given the relatively quiet operation of modern HVAC systems, it is unlikely that the Project's HVAC systems would be capable of increasing off-site ambient noise levels at surrounding noise-sensitive residential receptors by a discernable degree. The Project Site's existing use and surrounding existing uses, including dozens of surrounding residential uses and similar multi-family developments, all contain HVAC systems. Yet, noise from HVAC equipment was not found to be a substantial contributor to ambient noise levels surrounding the Project Site. In fact, noise from mechanical systems was

largely inaudible over the course of the noise measurement study. Typically, background noise was dominated by traffic noises from Crenshaw Boulevard and Sepulveda Boulevard. The Project's HVAC systems would not be capable of increasing noise levels at surrounding residential receptors, which also contain their own HVAC systems, by greater than 5 dBA L_{eq}.

Filtering and pumping equipment for the Project's proposed pool would be enclosed in mechanical rooms located within the Project's building envelope and would not be audible at any surrounding receptors.

Auto-Related Activities

The Project would include 465 parking spaces located in two subterranean parking levels. The Project Site currently includes 347 surface parking spaces associated with the existing government office use. Two key factors demonstrate that auto-related activities associated with Project parking would have a less than significant noise impact at surrounding residential land uses. First, whereas parking associated with the Project Site's existing use is uncovered, parking for the Project would be fully underground, which would provide significant attenuation of auto-related noises. Second, despite having a greater number of parking spaces, the Project would result in a net decrease of 55 vehicle trips per day as compared to the Project Site's existing use. Therefore, not only would the Project result in less auto-activity than the Project Site's existing use, but this activity would also be largely confined to subterranean parking levels where noise levels would be substantially attenuated. As a result, the Project is likely to result in a net reduction of auto-related noise levels.

Amenity Space/Open Space

The primary source of noise associated with the Project's balconies and shared amenity areas would be speech/conversation from Project users. Vocal noise from speech and conversation averages between 55 and 67 dBA at a reference distance of one meter, in proportion to background noise levels.[69] Surrounding residential land uses would be located a minimum 30 feet from the Project's amenity and open space areas, meaning that even the loudest speech would attenuate below the minimum 50 dBA L_{eq} noise threshold adopted by this analysis. Further, noise levels below 50 dBA L_{eq} would not correlate with ambient noise increases in excess of 5 dBA L_{eq} at surrounding residential land uses, given existing ambient noise levels. Reasonable use of the Project's exterior amenity spaces and other open spaces would not be expected to result in substantial or sustained noise increases at surrounding residential land uses.

Overall, the Project would be located in an area with similar dense multi-family land uses and other residential development. The Project's consistency with surrounding land use types and patterns further supports the conclusion that it would not alter the noise

69 *EPA, Speech Levels in Various Noise Environments, May 1977.*

environment of its surrounding by a substantial degree or result in substantial noise increases. As a result, the impact of the Project's on-site operational noise sources would be less than significant.

Off-Site Operational Noise

The Project is estimated to result in a net decrease of 55 vehicle trips per day. As a result, Project traffic would not contribute to noise increases on surrounding roadways, and this impact would be less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. As discussed in detail below, the Project would not result in the generation of excessive groundborne vibration or groundborne noise levels. Therefore, Project impacts related to groundborne vibration would be less than significant.

Groundborne Vibration Threshold

As discussed earlier, there are no federal, state, county, or City standards that would regulate the Project's vibration impacts from temporary construction activities, nor are there quantitative thresholds. As a result, the criteria identified by the FTA in its 2018 Transit Noise and Vibration Impact Assessment manual (refer to Table XIII-4) are used where applicable and relevant to assist in analyzing the Project's groundborne vibration impacts as they pertain to this impact issue.

Construction Vibration

Construction of the Project would require a variety of large, steel-tracked earthmoving vehicles. According to the FTA, large bulldozers and similar heavy-equipment can generate groundborne vibration levels up to 0.089 in/sec PPV at a reference distance of 25 feet. When excavating and grading for the Project's northern subterranean garage access ramp, these vehicles would operate up to approximately 15 feet from residential buildings located along Woodbury Drive. At 15 feet, groundborne vibration levels from large earthmoving vehicles would be 0.156 in/sec PPV, which is below the FTA's 0.2 in/sec PPV criteria for "non-engineered" buildings containing plaster coatings that is applicable to the residential buildings on Woodbury Drive. However, most operations of large earthmoving vehicles on the Project Site would occur within the footprint of the proposed subterranean levels, which are over 30 feet from the nearest buildings. At 30 feet, groundborne vibration levels from large earthmoving vehicles would be just 0.073 in/sec PPV, which is even further below the FTA's 0.2 in/sec PPV criteria. Impacts to more distant buildings would be reduced and also below FTA criteria.

Regarding the off-site sewer improvements, large earthmoving vehicles tasked with trenching and backfilling the sewer line could operate up to 15 feet from residential

buildings located along the western side of Crenshaw Boulevard. At 15 feet, groundborne vibration levels from these vehicles would be 0.156 in/sec PPV, which is also below the FTA's 0.2 in/sec PPV criteria that is applicable to these residential buildings. Impacts to more distant buildings would be reduced and also below FTA criteria.

As a result, the Project's building damage-related vibration impacts from construction would be less than significant.

Operational Vibration

The Project would not contain any significant sources of groundborne vibration, such as heavy equipment or industrial operations. The Project's related vehicle travel would not be considered a significant source of vibration, as vehicle travel rarely generates perceptible groundborne vibration. Therefore, the Project's operation-related groundborne vibration impact would be less than significant.

c) For a project located within the vicinity of a private airstrip 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?

No Impact. Though the Project Site is located approximately 1.3 miles from Torrance Municipal Airport (Zamperini Field), it is not located within the 60 dBA CNEL noise contour associated with airport operations, meaning that it would not expose people residing or working at the Project to excessive noise levels.[70] Thus, the Project would not expose people residing or working in the project area to excessive noise levels. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Construction

As discussed previously, the Project's construction activities would temporarily increase ambient noise levels at nearby sensitive receptors, but impacts would be considered less than significant after mitigation. Any other developments that are built at the same time as the Project could contribute to additional increases in noise levels at sensitive receptors and result in cumulatively considerable impacts. However, no related projects have been identified within a 500-foot radius of the Project Site or the location of off-site sewer improvements. The nearest related project, a mixed-use residential and commercial project located at 22600 Crenshaw Boulevard, would be approximately 1,300 feet southeast of the Project Site and approximately 1,000 feet north of the off-site sewer improvements. At these distances, construction noises from the Project and the related

70 *City of Torrance, 2009 General Plan, April 2010. Figure N-3.*

project would not be audible at shared sensitive receptors, much less capable of resulting in cumulatively considerable noise increases at these receptors.

Concerning vibration, the Project's construction activities would generate groundborne vibrations at surrounding buildings below levels that the FTA associates with architectural or structural damages. As stated previously, the Project's construction-related vibration impacts would be less than significant. Potential groundborne vibration impacts are generally limited to areas within 100 feet of construction activities. Given the aforementioned distances between these two projects, there is no potential that groundborne vibration resultant from the construction of the Project and the 22600 Crenshaw Boulevard related project would be cumulatively considerable at shared receptors.

For these reasons, cumulative construction noise and vibration impacts would be less than significant.

Operation

The Project's on-site operational noise sources would have a nominal effect on surrounding ambient noise levels at nearby residential uses that is below the adopted thresholds of significance. Because no related projects have been identified within a 500-foot radius of the Project, there is no potential for on-site operational noise or groundborne vibration sources associated with the Project to be audible or perceived at sensitive receptors to any related projects (and vice versa). As discussed, noises from on-site operational sources such as HVAC equipment and speech would rapidly attenuate.

Regarding off-site operational noise sources, the analysis discusses how the Project would result in a net decrease in vehicle traffic as compared to the Project Site's existing use. Thus, the Project would not increase traffic-related noise along surrounding roadways. Because the Project would not result in traffic-related noise increases, the Project would not contribute to any cumulatively considerable traffic-related noise increases.

Therefore, cumulative operational noise and vibration impacts would be less than significant.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Would the project 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)?

Less Than Significant Impact. The Project Site is located within SCAG's jurisdiction. SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. The 2020-2045 RTP/SCS includes the following projected growth forecast for population, households, and employment for the City[71]:

- Population: 147,100 persons in 2016 and 153,100 in 2045;
- Households: 55,600 households in 2016 and 57,300 in 2045; and
- Employment: 1126,600 jobs in 2016 and 133,800 in 2045.

Table XIV-1 lists SCAG's forecasts for population, housing, employment, and persons-per-household rate for the City, as well as the number and percent change.[72]

[71] *SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast, Table 14, https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal-02-Plan.pdf*

[72] *Employment information is provided for informational purposes only.*

Table XIV-1
Population, Housing, Employment,
and Persons-per-Household Forecasts for the City
Based on the 2020-2045 RTP/SCS

Year	Population	Households	Employment[1]	Person/Households
2027[3]	149,376	56,348	129,768	2.65
2045	153,100	57,300	133,800	2.67
Change 2027 to 2045				
Number Changed	+3,724	+952	+4,032	0.02
Percent Changed	+2.49%	+1.68%	+3.10%	0.79%

[1] *Employment information is provided for informational purposes only.*
[2] *Population, housing and employment rate data for 2027 (anticipated buildout year of the Project) was calculated based on a linear interpolation of growth projections in SCAG's 2020-2045 RTP/SCS.*
[3] *Represents a comparison of baseline year to Project buildout year.*

Project Impacts

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project area and would not induce substantial population growth and/or require permanent housing. Therefore, the Project's population growth impacts associated with construction activities would be less than significant.

Operation

Indirect Growth

The Project includes infill development of a site that is located in an urbanized area.

The Project would include a sewer line upgrade from 12 inches to 15 inches would be required to meet the sewer discharge demands of the Project. The lateral extent of the sewer line upgrade would be along the west edge of Crenshaw Boulevard from 230th Street to 233th Street, approximately 1,200 feet in length, joining the existing 15-inch sewer downstream of 233rd Street. This relocation would allow for development of the Project on the Project Site but would not allow for expansion of new development.

Otherwise, the Project would be served by existing infrastructure and would not require or include the development of any new utility or roadway infrastructure beyond what is required to accommodate the Project only. Thus, the Project would not indirectly induce substantial population growth, and no impacts related to indirect population growth would occur as a result of the Project.

Direct Growth

The Project includes demoltion and removal of the existing 69,913-square-foot commercial office building, currently occupied by the Los Angeles County Department of Children and Family Services (DCFS), and surface parking with 347 vehicle parking spaces from the Project Site and development of the site with four residential buildings with a total of 272 multi-family residential dwelling units (including 28 dwelling units set aside for Very Low Income households) over two levels of subterranean parking. Based on a 2.65 persons-per-household rate for the City, the Project would add approximately 721 residents to the Project Site.[73] It should be noted that some or all of the 721 people could already live in the City and would represent no increase or a partial increase in the City's residential population. However, for a conservative analysis, it is assumed that all 721 people would be new residents of the City. As shown in Table XIV-2, the Project's residential population would represent approximately 19.3 percent of the forecasted growth between 2027 and 2045. Also, Project's residential units would represent approximately 28.5 percent of the forecasted growth between 2027 and 2045.

The Project is consistent with the type of development supported by SCAG. The Project would construct housing units near sources of employment shopping, and entertainment. Of the 272 proposed dwelling units, 28 of the units would be set aside for Very Low Income households. The Project would include 120 long-term bicycle parking spaces and 12 short-term parking spaces. The Project Site is in close proximity to transit, including Torrance Transit Lines 7 and 10. Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work and to shop. By developing new market-rate and affordable housing and facilitating alternatives to driving, the Project would reduce VMT and associated GHG emissions while supporting healthy and equitable communities. Thus, the Project would not represent substantial or significant unplanned growth as compared to projected growth for the City. Therefore, Project impacts related to population and housing growth would be less than significant.

73 *Calculated based on SCAG's extrapolated 2027 population estimation and household for the City.*

Table XIV-2
Project Estimated Comparison for the City
Based on the 2020-2045 RTP/SCS

Project	Comparison Amount[1]	% of Comparison
As compared to Growth Forecast from 2027 to 2045		
721 residents	+3,724	19.3%
272 units	+952	28.5%

[1] *Refer to Table XIV-1.*

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. No people are living at the Project Site, and no housing is located on the Project Site. As such, the Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur.

Cumulative Impacts

There are 6 related projects in the vicinity of the Project Site (refer to Appendix A) that include the development of 283 residential dwelling units, a 34-room hotel, 44,577 square feet of retail, a 43,377-square-foot warehouse, and a 14,900-square-foot office. The commercial uses will likely create employment that can be filled from the existing workforce in the City and would not attract new residents to the area. The more potentially direct generator of new residents is residential development.

Combined with the Project, the potential cumulative housing increase would be 555, and the potential cumulative residential population increase would be 1,470. As shown in Table XIV-3, cumulative population growth would represent 39 percent of the forecasted growth between 2027 and 2045, and cumulative housing growth would represent 58 percent of the forecasted housing growth between 2027 and 2045. Thus, cumulative population and housing growth would fall within the forecasted growth for the City. Thus, cumulative development would not represent substantial or significant unplanned growth as compared to projected growth for the City. Therefore, cumulative impacts related to population and housing growth would be less than significant.

Table XIV-3
Cumulative Estimated Comparison for the City

Project	Comparison Amount[1]	% of Comparison
As compared to Growth Forecast from 2027 to 2045		
1,471 residents	+3,724	39%
555 units	+952	58%

[1] *Refer to Table XIV-1.*

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a) Fire protection?

Less Than Significant Impact. The Project includes a sewer line upgrade from 12 inches to 15 inches would be required to meet the sewer discharge demands of the Project. The lateral extent of the sewer line upgrade would be along the west edge of Crenshaw Boulevard from 230th Street to 233th Street, approximately 1,200 feet in length, joining the existing 15-inch sewer downstream of 233rd Street. Additionally, the project includes development and removal of the existing 69,913-square-foot Los Angeles County Department of Children and Family Services (DCFS) office building and surface parking with 347 vehicle parking spaces from the Project Site and development of the site with 272 residential dwelling units in four buildings. Based on a 2.65 persons-per-household rate for the City, the Project would add approximately 721 residents to the Project Site.[74] It should be noted that it is possible that all or some of the 721 residents could already live in the City with an existing demand for fire protection services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for fire protection services. This analysis conservatively assumes that all 721 residents would be new residents to the City.

Fire Prevention and emergency medical services in the City are provided by the Torrance Fire Department (TFD). Services include fire suppression, technical rescue, hazardous

74 *Calculated based on SCAG's extrapolated 2027 population estimation and household for the City.*

material response, electronic fire inspections, and public education/community outreach. The following three fire stations are within two miles of the Project Site:

- Fire Station 1, located at 1701 Crenshaw Boulevard, approximately 0.5 miles from the Project Site
- Fire Station 6, located at 21401 Del Amo Circle, approximately 1.57 miles from the Project Site
- Fire Station 2, located at 25135 Robinson Way, approximately 2.0 miles from the Project Site

Primary fire protection services to the Project would be from Fire Station 1, which is located 0.5 miles northeast.

It is anticipated that the construction of the upsized sewer line would require at least one southbound lane closure due to the existing sewer main location within Crenshaw Boulevard. In order to keep a sewer line operational at all times, a temporary 12-inch bypass line may be constructed to maintain sewer connectivity while the existing 12-inch line is being removed and replaced with the new 15-inch permanent sewer line. This is likely to be constructed in phases and with planned sequencing and overlapping construction activities. Each segment may be completed within a two-week period lasting a total of approximately four months for the full sewer upgrade. Given that the sewer line upgrade would not require full roadway closures and would be temporary, this activity would not require the construction of any new or expanded fire protection facilities.

During construction at the Project Site, all construction equipment and activities would be confined to the Project Site. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Construction-related traffic generated by the Project (i.e., movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic) would occur outside of typical peak traffic hours and would be short-term and temporary. The Project would be required by the City to employ temporary traffic controls, such as flag persons and signage, as needed to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would be used, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Emergency access would be maintained at all times during the construction period.

The Project would incorporate fire prevention infrastructure pursuant to current code requirements. The City has adopted the California Fire Code (Title 24, Part 9 of the

California Code of Regulations) in the City's Municipal Aode as Section 85.1.010, which regulates new structures related to safety provisions, emergency planning, fire-resistant construction, fire protection systems, and appropriate emergency access throughout a site. The Project's adherence to existing fire code requirements would be verified as part of the regular permitting process.

Additionally, the Project would replace existing uses with an existing demand for fire protection services. Further, the Project would contribute with the City's Development Impact Fee (DIF), which is 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 cost identified for public facilities, such as fire protection.

For all the reasons presented above, the Project would not require the need for construction of new or expanded facilities for fire protection services. Therefore, Project impacts related to fire protection services would be less than significant.

Cumulative Impacts

Implementation of the six related projects listed in Appendix A in concert with the Project, could result in a net increase in the number of residents and employees in the Project Site area and could further increase the demand for fire protection services. Cumulative development requires the TFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related projects are replacing existing uses with existing demand for fire protection services. Also similar to the Project, the related projects would be subject to the Fire Code and other applicable regulations of the City's Municipal Code including, but not limited to, automatic fire sprinkler systems for projects located farther than specified distances from the nearest fire stations to compensate for additional response time, and other recommendations made by the TFD to ensure fire protection safety. Through the process of compliance, the ability of the TFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional TFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Thus, cumulative development would not cause the need for new or altered fire protection facilities, the construction of which could result in significant environmental impacts. Therefore, cumulative impacts on fire protection services would be less than significant.

b) Police protection?

Less Than Significant Impact. The Project includes a sewer line upgrade from 12 inches to 15 inches would be required to meet the sewer discharge demands of the Project. The lateral extent of the sewer line upgrade would be along the west edge of Crenshaw Boulevard from 230th Street to 233th Street, approximately 1,200 feet in length, joining the existing 15-inch sewer downstream of 233rd Street. Additionally, the Project includes

demolition and removal of the existing 69,913-square-foot DCFS office building and surface parking with 347 vehicle parking spaces from the Project Site and development of the site with 272 residential dwelling units in four buildings. Based on a 2.65 persons-per-household rate for the City, the Project would add approximately 721 residents to the Project Site.[75] It should be noted that it is possible that all or some of the 721 residents could already live in the City with an existing demand for fire protection services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for fire protection services. This analysis conservatively assumes that all 721 residents would be new residents to the City.

The Torrance Police Department (TPD) provides police protection to the City. The TPD station is located at 3300 Civic Center Drive, approximately 1.5 miles from the Project Site. The TPD currently employs 227 sworn officers and 128 civilian staff. The Project includes the construction of 272 multi-family units within an existing commercial and residential area.

During the Project's construction phase, the Project would provide security on the Project Site as needed and appropriate during the construction process. This security would include perimeter fencing, lighting, and security guards, thereby reducing the demand for TPD services. The specific type and combination of construction site security features would depend on the phase of construction. The Applicant would install temporary construction fencing to secure the Project Site during the construction phase to ensure that valuable materials (e.g., building supplies and metals such as copper wiring), as well as construction equipment, are not easily stolen.

Typically, residential uses result in a higher demand for police protection services compared to other uses because residential uses add a permanent population to an area. As discussed in response to Checklist Question XIV(a) (Population and Housing – Unplanned Population Growth), the Project's population growth would fall within the forecasted population growth for the City. Thus, while the Project may lead to an increase in demand for police protection services, such as an increase in service calls and traffic enforcement, by adding new residents to the area, such an increase is within the forecasted growth for the City. Additionally, the Project would include security lighting, secured entrances, and video monitoring. Also, the Project would replace existing uses with an existing demand for police protection services. Further, the Project would be required to pay all applicable DIF payments, which would contribute to funding the TPD. These fees are used to address any incremental development project impact and are to be used for infrastructure improvements and services. Thus, the Project would not result in the need for new or expanded infrastructure for police protection services. Therefore, Project impacts related to police protection services would be less than significant.

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75 *Calculated based on SCAG's extrapolated 2027 population estimation and household for the City.*

Cumulative Impacts

Implementation of the six related projects listed in Appendix A in concert with the Project, could result in a net increase in the number of residents and employees in the Project Site area and could further increase the demand for police protection services. Cumulative development requires the TPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related projects are replacing existing uses with existing demand for police protection services. Also, the related projects will incorporate security features such as lighting and secured entrances as crime prevention measures. Furthermore, the increased demand for additional TFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the proposed Project and related projects would contribute. Thus, cumulative development would not cause the need for new or altered fire protection facilities, the construction of which could result in significant environmental impacts. Therefore, cumulative impacts on police protection services would be less than significant.

c) Schools?

Less Than Significant Impact. The Project includes demolition and removal of the existing 69,913-square-foot DCFS office building and surface parking with 347 vehicle parking spaces from the Project Site and development of the site with 272 residential dwelling units in four buildings. Based on a 2.65 persons-per-household rate for the City, the Project would add approximately 721 residents to the Project Site.[76] It should be noted that it is possible that all or some of the 721 residents could already live in the City with an existing demand for fire protection services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for fire protection services. This analysis conservatively assumes that all 721 residents would be new residents to the City.

The Project Site falls within the boundaries of the Torrance Unified School District (TUSD). TUSD schools that serve the Project Site and area are shown in Table XV-1. As shown, all of the schools serving the Project Site and area are operating under capacity. As shown in Table XV-2, the Project would generate a total of approximately 79 students. It should be noted that it is possible that all or some of the estimated Project students could already live in the City with an existing demand for school services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for school services. This analysis conservatively assumes that all estimated Project students would be new students to the City. Pursuant to California Government Code Section 65995, payment of the school fees established by the TUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Thus, the Project would not

76 *Calculated based on SCAG's extrapolated 2027 population estimation and household for the City.*

cause the need for new or altered school facilities, the construction of which could result in significant environmental impacts. Therefore, Project impacts on school services would be less than significant.

Table XV-1
TUSD Schools Serving the Project Site Area and Student Capacity and Enrollment

School	Capacity	Enrollment	(-)Under/(+)Over Capacity
Hickory Elementary School	838	818	-20
Madrona Middle School	771	664	-107
Torrance High School	2,277	2,005	-272

Source: TUSD, 2023. Refer to Appendix I.

Table XV-2
Estimated Project Student Generation

Land Use	Size	Student Type	Student Generation Rate	Total Students Generated
Residential	272 du	Elementary (K-6)	0.1311/du	36
		Middle (7-8)	0.0660/du	18
		High (9-12)	0.0924/du	25
			Total	**79**

du = dwelling unit

Source: Torrance Unified School District, 2023. Refer to Appendix I.

Cumulative Impacts

Implementation of the six related projects listed in Appendix A in concert with the Project could result in a net increase in the number of students in the Project Site area and could further increase the demand for school services. Similar to the Applicant of the Project, the applicants of all the related projects would be required to pay the state-mandated applicable school fees to their respective school districts to ensure that no significant impacts to school services would occur. Thus, cumulative development would not cause the need for new or altered school facilities, the construction of which could result in significant environmental impacts. Therefore, the cumulative impacts on school services would be less than significant.

d) Parks?

Less Than Significant Impact. The Torrance Community Services Department (TCSD) operates and maintains park and recreational services and facilities in the Project Site area. Parks and recreational facilities in the City are listed in Table XV-3.

Table XV-3
Parks and Recreational Amenities in the City

Parks	Amenities	Acreage
ALTA LOMA PARK 26126 Delos Drive	-Picnic areas, barbecues, playground, meeting rooms, basketball court, restrooms, walking path	5.5
COLUMBIA PARK 4045 190th Street,	-Special Facilities, picnic areas, barbecues, playground, Softball field, sand volleyball court, horseshoes, restrooms, walking path	52.0
DE PORTOLA PARK 25615 Lazy Meadow Drive	-Picnic areas, barbecues, playground, softball field, basketball court, sand volleyball court, restrooms, walking path	12.5
DELTHORNE PARK 3401 Spencer Street	-Picnic areas, barbecues, playground, basketball court, restrooms, walking path	9.7
DESCANSO PARK 2500 Descanso Way	-Picnic areas, playground, softball field, walking path	3.0
DISCOVERY PARK 22526 Ocean Avenue	-Picnic areas, barbeque, playground	0.39
EL NIDO PARK 18301 Kingsdale Avenue	-Picnic areas, barbeque, playground, meeting rooms, softball field, basketball court, sand volleyball court, horseshoes, restrooms	12.3
EL PRADO PARK El Prado Avenue	- Special facilities	2.9
EL RETIRO PARK 126 Vista Del Parque	-Picnic areas, barbecues, playground, meeting rooms, softball field, basketball court, tennis court, restrooms	4.8
ENTRADERO PARK 5500 Towers Street	-Picnic areas, barbecues, playground, softball field, basketball court, restrooms, walking path	26.5
GREENWOOD PARK 1520 Greenwood Avenue	-Playground, meeting rooms, softball field, basketball court	3.4

Table XV-3
Parks and Recreational Amenities in the City

Parks	Amenities	Acreage
GUENSER PARK 17800 Gramercy Place	-Picnic areas, barbecues, playground, softball field, basketball court, horseshoes, restrooms, walking path	7.8
HICKORY PARK 2850 232nd Street	-Picnic areas, barbecues, playground, sand volleyball court, tennis court, restrooms	5.8
LA CARRETERA PARK 2040 186th Street	-Picnic areas, barbecues, playground, basketball court	3.1
LA PALOMA PARK Lomita Boulevard	-Barbecues, playground	0.4
LA ROMERIA PARK 19501 Inglewood Avenue	-Picnic areas, barbecues, playground, meeting rooms, softball field, basketball court, tennis court, horseshoes, restrooms	6.6
LAGO SECO PARK 3920 235th Street	-Special facilities, picnic areas, barbecues, playground, softball field, basketball court, restrooms, walking path	14.7
LOS ARBOLES (ROCKETSHIP) PARK 5101 Calle de Ricardo	-Special facilities, picnic areas, playground	6.3
MCMASTER PARK 3624 Artesia Boulevard	-Picnic areas, playground, meeting rooms, softball field, basketball court, restrooms	5.5
MIRAMAR PARK 201 Paseo De La Playa	-Special facilities	1.1
OSAGE PARK 17008 Osage Avenue	-Picnic areas, playground	0.2
PARADISE PARK 5006 Lee Street	-Picnic areas, barbecues, playground, tennis court, restrooms	4.7
PEQUENO PARK 4223 180th Street	-Picnic areas, barbecues, playground	0.7
PUEBLO PARK 2292 Del Amo Boulevard	-Picnic areas, barbecues, playground, basketball court, restrooms	0.5
PUEBLO PARK BUILDING 2252 Del Amo Boulevard	-Meeting rooms, restrooms	0.17
RIVIERA PARK Bounded by Catalina Avenue & Palos Verdes Drive	-Passive park	0.3

Table XV-3
Parks and Recreational Amenities in the City

Parks	Amenities	Acreage
SEA AIRE PARK / GOLF COURSE 22730 Lupine Drive	-Special facilities, picnic areas, playground, meeting rooms, restrooms	5.2
SEASIDE HEROES PARK 22851 Anza Avenue	-Special facilities, playground	1.2
SUNNYGLEN PARK 5525 Del Amo Boulevard	-Picnic areas, barbecues, playground, softball field, basketball court, walking path	5.5
SUR LA BREA PARK 23610 Cabrillo Avenue	-Picnic areas, barbecues, playground, meeting rooms, softball field, basketball court, tennis court, pickleball, horseshoes, restrooms, walking path	7.4
TORRANCE PARK 2001 Santa Fe Avenue	-Special facilities, picnic areas, barbecues, playground, softball field, basketball court, horseshoes, restrooms	10.2
VICTOR PARK 4727 Emerald Street	-Picnic areas, barbecues, playground, basketball court, sand volleyball court, horseshoes, restrooms, walking path	6.6
WALTERIA PARK 3855 242nd Street	-Special facilities, picnic areas, barbecues, playground, meeting rooms, softball field, basketball court, tennis court, pickleball, horseshoes, restrooms	4.5
WILSON PARK (CHARLES H.) 2200 Crenshaw Boulevard	-Special facilities, picnic areas, barbecues, playground, softball field, basketball court, sand volleyball court, tennis court, pickleball, horseshoes, restrooms, walking path	44.1
	Total	**275.56**
Source: City of Torrance Community Services Department, 2023. Refer to Appendix I.		

The Project includes demolition and removal of the existing 69,913-square-foot Los Angeles County Department of Children and Family Services (DCFS) office building and surface parking with 347 vehicle parking spaces from the Project Site and development of the site with 272 residential dwelling units. Based on a 2.65 persons-per-household

rate for the City, the Project would add approximately 721 residents to the Project Site.[77] It should be noted that it is possible that all or some of the 721 residents could already live in the City with an existing demand for parks and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for parks. This analysis conservatively assumes that all 721 residents would be new residents to the City.

As shown in Table XV-4, the Project would be required to include a minimum of 81,600 square feet of open space. The Project would provide 138,245 square feet of open space, including courtyards, pool and spa, picnic facilities, and private open space.

Table XV-4
Open Space Requirements

Number of Units	Open Space Requirement	Total
272 du	300 sf/du	81,600 sf
du = dwelling unit sf = square feet		

According to the Community Resources Element of the City's General Plan, the City seeks to provide open space at a ratio of 10 acres per 1,000 residences. As stated previously, the Project would add approximately 721 residents to the Project Site. Thus, implementation of the Project would require approximately 7.21 acres of parkland. As stated previously, the Project would include 138,245 square feet of open space. In addition to the onsite open space, the Project would be required to pay park and recreation in-lieu fees and Community Services Fees as part of the City DIFs. Provision of recreational and open space facilities onsite along with the payment of in-lieu fees would ensure that the Project would not create the need for new or expanded park facilities. Therefore, Project impacts related to parks and recreational services would be less than significant.

Cumulative Impacts

Implementation of the six related projects listed in Appendix A in concert with the Project could result in a net increase in the number of residents in the Project Site area and could further increase the demand for parks. All residential development in the City is required to provide open space in accordance with the Citys open space requirements, in addition to payment of park and recreation in-lieu fees to mitigate demand for parks. Therefore, cumulative impacts on parks would be less than significant.

[77] *Calculated based on SCAG's extrapolated 2027 population estimation and household for the City.*

e) Other public facilities?

Libraries

Less Than Significant Impact. Libraries in the City include the following:

- Katy Geissert Civic Center Library
- El Retiro Library
- Southeast Branch Library
- Walteria Library
- Isabel Henderson Library
- North Torrance Library

The Project includes demolition and removal of the existing 69,913-square-foot Los Angeles County Department of Children and Family Services (DCFS) office building and surface parking with 347 vehicle parking spaces from the Project Site and development of the site with 272 residential dwelling units. Based on a 2.65 persons-per-household rate for the City, the Project would add approximately 721 residents to the Project Site.[78] It should be noted that it is possible that all or some of the 721 residents could already live in the City with an existing demand for parks and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for parks. This analysis conservatively assumes that all 721 residents would be new residents to the City. Although the Project could increase the demand for library services in the Project Site area, because the area is well served by several existing libraries, the Project would not cause the need for new or expanded library facilities. Therefore, Project impacts on library services would be less than significant.

Cumulative Impacts

Implementation of the residential related projects listed Appendix A in concert with the Project could result in a net increase in the number of residents in the Project Site area and could further increase the demand for library services. However, City is well-served by several existing libraries, and cumulative development would not cause the need for new or altered library facilities, the construction of which could result in significant environmental impacts. Therefore, cumulative impacts related to library services would be less than significant.

78 *Calculated based on SCAG's extrapolated 2027 population estimation and household for the City.*

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

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?

Less Than Significant Impact. As discussed in response to Checklist Question XI(a)(iv) (Public Services – Parks), the Project would add approximately 721 residents to the Project Site. Thus, implementation of the Project would require approximately 7.21 acres of parkland. As stated previously, the Project would include 138,245 square feet of open space. In addition to the onsite open space, the Project would be required to pay park and recreation in-lieu fees and Community Services Fees as part of the City DIFs. The provision of recreational and open space facilities onsite along with the payment of in-lieu fees would ensure that the Project would not create the need for new or expanded park facilities. Therefore, Project impacts related to parks and recreational services would be less than significant.

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?

No Impact. The Project includes development of a variety of indoor and outdoor private and public open space areas that would serve Project residents. The impact of developing the Project's open space is inclusive of the overall impacts of the Project. The Project does not include the construction of recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, no Project impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

As discussed in response to Checklist Question XI(a)(iv) (Public Services – Parks), implementation of the six related projects listed in Appendix A in concert with the Project could result in a net increase in the number of residents in the Project Site area and could further increase the demand for parks. All residential development in the City is required to provide open space in accordance with the Citys open space requirements, in addition to payment of park and recreation in-lieu fees to mitigate demand for parks. Therefore, cumulative impacts on parks would be less than significant.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 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)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The transportation plans that are applicable to the Project include the Circulation and Infrastructure Element of the City's General Plan, Los Angeles County Metropolitan Transportation Authority's (LA Metro) Long Range Transportation Plan, and SCAG RTP/SCS. As discussed below, the Project would not conflict with these plans. Therefore, Project impacts related to consistency with adopted plans and policies would be less than significant.

Consistency of the Project with the 2009 City of Torrance General Plan

The 2009 Torrance General Plan is the principal policy document for guiding future development in the City with setting goals and policies to help guide priorities, resources, and efforts over the next 15– to 20–year time frame.

The General Plan contains transportation-related policies in Chapter 2: Circulation and Infrastructure Element. The Circulation and Infrastructure Element was adopted in 2010 and provides goals and policies for circulation and utility systems to support land use densities and intensities. The following objectives, policies, and programs are relevant to the Project:

Objective CI-7: Expansion and optimization of local and regional bus and other transit systems.

- As a housing development located within a ¼-mile of the Crenshaw Boulevard and Park Del Amo S.C.R.O.C bus stops and the Sepulveda Boulevard and Crenshaw Boulevard bus stops, the Project supports the expansion of transit and would not preclude transit system optimization.

Policy CI-3.4: Encourage the use of regional rail, buses, bicycling, carpools, and vanpools for work trips.

- The Project Site is located within ¼-mile of bike routes and bus stops and is adjacent to the Park Del Amo business center and other employment areas. Several light industrial, residential, commercial, and office areas are within one mile of the Project. Thus, the Project has the potential to generate multimodal transportation work and shopping trips. By increasing residential density near employment and shopping areas, the Project would facilitate non-auto commute trips.

Policy CI-4.1: Protect residential neighborhoods from cut-through traffic by improving signage, guiding traffic away from residential areas, and employing appropriate traffic-calming methods.

- The Project Site is surrounded by parking spaces and other development within an existing superblock development. Project traffic is routed through its own private streets before accessing Crenshaw Boulevard and Sepulveda Boulevard, which are major roadways. Project traffic would not travel through other residential areas to reach regional thoroughfares.

Policy CI-7.2: Coordinate transit planning with regional and county transportation agencies.

- The Project would have a limited effect on transit planning and would be consistent with transit planning policies. The Project would not preclude the City from coordinating transit planning with other agencies.

Policy CI-7.3: Support and encourage the use of public transit.

- The Project Site is located within a ¼-mile of bus stops served by Torrance Transit Lines 7 and 10. By providing infill housing near sources of employment and shopping, the Project would support and encourage the use of public transit and multimodal trips.

Policy CI-7.4: Establish a transit center.

- The Project is consistent with Policy CI-7.4 as the Project would not preclude the development of a transit center in the City of Torrance.

Policy CI-7.5: Provide attractive and appropriate transit amenities.

- While the Project would be conducive to encouraging transit use, the Project would not preclude Torrance Transit from providing various transit amenities in the public right-of-way.

Policy CI-7.9: Support light rail usage by providing connections to transfer opportunities through the Torrance Transit System.

- The Project Site is located within a ¼-mile of bus stops served by Torrance Transit Lines 7 and 10. By providing infill housing near sources of employment and shopping, the Project would support and encourage the use of public transit and multi-modal trips. At this time, there are no light rail stations in the City. However, the proposed C Line extension to the City is currently in planning stages, and construction has not yet started.

Policy CI-7.10: Implement signal prioritization to support public transit and provide more efficient transit services.

- The Project would not preclude the City's ability to implement traffic signal projects, including signal prioritization for public transit.

Consistency of the Project with LA Metro's 2020 Long Range Transportation Plan (LRTP)

LA Metro's 2020 Long-Range Transportation Plan (LRTP) gives detailed planning, operating, and maintaining instructions for Metro to improve transportation mobility. It provides guidance and policies for funding programs and development within LA County for a more accessible and sustainable future over the next 30 years.

The 2020 Metro LRTP contains four priority areas: Better Transit, Less Congestion, Complete Streets, and Access to Opportunity. The LRTP's strategies and actions are organized by these four priority areas. Below are summaries of each priority area and a consistency review of the Project.

Better Transit: The priority focuses on building more frequent, secure and reliable public transportation with more opportunities and better services, which also shows a good connection with multimodal transportation options on bus, bike and rail, etc.

- The Project Site is located within a ¼-mile walk to bus stops served by Torrance Transit and bike routes on surrounding boulevards. The Project would not preclude LA Metro from improving transit network reliability and expansion.

Less Congestion: This priority is for providing a more efficient roadway transportation system by using technology and policies to manage traffic flow and improve travel time.

- The Project is consistent with this priority area as the Project proposes infill housing near sources of transit employment, and shopping, and would reduce VMT and congestion.

Complete Streets: This area contains utilizing infrastructure and design to create an integrated transportation network with safe and convenient travel experiences. Priority emphasis on the connectivity of all transportation modes, safety of all users, and environmentally sustainability of transportation system.

- The Project Site is located near bike routes and bus stops within a ¼-mile, and would not preclude LA Metro efforts to improve the safety and accessibility of streets for pedestrians, public transit users. and bicyclists.

Access to opportunity: Metro wants to bring all transportation users to a closer connection of jobs, homes, and other community services. This priority focuses on increasing equity, reducing pricing, investing workforce, etc.

- The Project Site is located within a ¼-mile of bus stops served by Torrance Transit Lines 7 and 10 and is located adjacent to the Park Del Amo business center and other commercial areas. By providing infill housing near sources of employment and shopping, the Project would support and encourage multimodal transportation access to all kinds of opportunities.

Consistency with SCAG's RTP/SCS

Every four years, SCAG updates its RTP for the 191-city SCAG region. Beginning with the 2012 RTP, SB 375 required the inclusion of a SCS in RTPs prepared by MPOs such as SCAG. The key goal of the SCS is to achieve GHG emission reduction targets through integrated land use and transportation strategies. A key objective is for planners and developers to consider how land use patterns influence travel demand.

The 2020-2045 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and includes 10 goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting the implementation of sustainability policies.

As part of the transportation modeling and analysis for the RTP/SCS, SCAG prepares population and employment growth projections by Transportation Analysis Zone (TAZ) and creates a future transportation network that represents the changes to the existing network based on the regional project list. TAZs are geographic polygons representing communities and neighborhoods at a sub-city level of detail. The Project was compared against the 2020-2045 RTP/SCS forecasts and network changes included in the 2020-2045 RTP/SCS model. Given that the Project would not result in any changes to the existing transportation network and would be increasing housing density in urban infill areas near transit, the Project would be consistent with the 2020-2045 RTP/SCS.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3?

Less Than Significant Impact. A technical memorandum was prepared for the Project by Fehr and Peers that includes a screening analysis and assesses the Project's trip generation, VMT, and site access (refer to Appendix J).

Transportation Analysis Requirements

The City requires proposed development projects to evaluate CEQA transportation impacts in accordance with the City's VMT-Based Traffic Impact Analysis (TIA) Guidelines. The TIA Guidelines provide VMT screening and analysis criteria that conform with Senate Bill 743 and CEQA.

Project Trip Generation

Trip generation rates from the Institute of Transportation Engineers' (ITE) Trip Generation, 11th Edition, 2021 were used to estimate the number of trips associated with the Project. The Multifamily (low-rise) land use category (#220) was used for the dwelling units located in three-story buildings, while the Multifamily (mid-rise) land use category (#221) was used for the dwelling units located in the four- and five-story buildings. Because the existing Project Site is occupied by a government agency and was observed to be operating in-person at the time of preparation of the technical memorandum, an existing use credit was applied using the Government Office (#730) land use category. The Project trip generation estimates are presented in Table XVII-1. As shown, the Project would generate a net increase of 8 daily vehicle trips, a net reduction of 100 vehicle trips during the AM peak hour, and a net increase of 10 vehicle trips during the PM peak hour.

TIA Screening Assessment

The City's TIA Guidelines identify three screening criteria to determine what type of VMT analysis, if any, is needed. If a project meets any of the three screening criteria, the project would be presumed to have a less-than-significant impact related to VMT, provided that the project is consistent with the 2020-2045 RTP/SCS with respect to transportation and

would not negatively impact transit systems and bicycle and pedestrian networks. The three screening criteria are discussed below.

Screening Criteria 1: Project Type/Size

Projects that generate fewer than 110 net new daily trips, local-serving retail projects, local-serving public facilities, and 100 percent affordable housing projects are presumed to have less-than-significant VMT impacts absent substantial evidence to the contrary. Local-serving retail is defined as commercial projects with local-serving retail uses less than 50,000 square feet, while local-serving public facilities are transit centers, public schools, libraries, parks, post offices, park-and-ride lots, police and fire facilities, and government offices.

As shown in Table XVII-1 and as stated previously, the Project would generate fewer than 110 net new daily trips. Thus, the Project is screened out from further VMT analysis under this screening criterion.

Screening Criteria 2: Low VMT Area Screening

Residential projects located within a low-VMT-generating area may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. Based on the City's VMT impact threshold, low VMT for residential projects is defined as an area that generates daily VMT on a per capita basis that is 15 percent or more below the Los Angeles County Home-Based VMT per Capita. The TAZ that are identified as the low-VMT-generating areas in the City can be found in Figure 8 of the TIA Guidelines. The Project does not include any commercial components.

The Project is located in a TAZ (21283100) that generates VMT on a per capita basis that is 15 percent or more below the Los Angeles County average. The Project TAZ contains a high residential population, and the Project includes adding similar uses to this TAZ. Thus, the Project is in an area with low residential VMT, which means the Project can be screened out from further VMT analysis under this screening criterion and would have a less-than-significant VMT impact.

Table XVII-1
Project Trip Generation

Land Use	ITE Land Use Code	Size	Trip Generation Rates[1]							Estimated Trip Generation						
			Daily	AM Peak Hour			PM Peak Hour			Daily	AM Peak-Hour Trips			PM Peak-Hour Trips		
				Rate	In%	Out%	Rate	In%	Out%		In	Out	Total	In	Out	Total
Project																
Multi-Family Low-Rise[2]	220	69 du	6.74	0.4	24%	76%	0.51	63%	37%	465	7	21	28	22	13	35
Multi-Family Mid-Rise[2]	221	202 du	4.51	0.31	23%	77%	0.39	61%	39%	917	17	58	75	48	31	79
									Total Project Trips	**1,382**	**24**	**79**	**103**	**70**	**44**	**114**
Existing																
Government Office Building	730	60.80 ksf	22.59	3.34	75%	25%	1.71	25%	75%	1,374	152	51	203	26	78	104
									NET TOTAL	**8**	**(128)**	**28**	**(100)**	**44**	**(34)**	**10**

du = dwelling unit ksf = 1,000 square feet

[1] Source: ITE, Trip Generation, 11th Edition, 2021.

[2] The Project includes residential units in multiple buildings varying from three to five stories. ITE defines Multi-family Housing (Low-Rise) as buildings with two or three floors and Multi-family Housing (Mid-Rise) as buildings between four and ten floors.

Source: Fehr & Peers, 2023. Refer to Appendix J.

Screening Criteria 3: Transit Proximity Screening

Projects located in proximity to high-quality transit may also be exempt from VMT analysis because these projects are presumed to have a less-than-significant impact absent substantial evidence to the contrary. Transit Priority Areas (TPAs) are defined as a ½ mile radius around an existing or planned major transit stop or an existing stop along a high-quality transit corridor (HQTC). An HQTC is defined as a corridor with a fixed route bus service frequency of no longer than 15 minutes during peak commute hours. For this analysis, the morning and afternoon peak commute hours are defined as 6:00 AM to 9:00 AM and 3:00 PM to 6:00 PM, respectively. A map of the City's HQTAs (pre-pandemic) can be found in Figure 10 of the TIA Guidelines.

Because the current Torrance Transit bus service has been reduced as a result of the pandemic, the Project is not located within a ½-mile radius of a current major transit stop. Therefore, the Project is not screened out from VMT analysis under this screening criterion.

Conclusion

As summarized, the Project meets two of the City's screening criteria based on the TIA Guidelines and is presumed to result in a less than significant VMT impact. The Project is also consistent with the 2020-2045 SCAG RTP/SCS by providing in-fill housing in a low-VMT area near commercial and employment areas. The Project would also not conflict with existing public transit or bicycle and pedestrian facilities. Therefore, the Project is screened out from needing to prepare a full TIA document.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Current access to the Project Site is provided via two access points – one at the northeast corner of the site from Crenshaw Boulevard and the second at a south-central point of the site. The Project would maintain these two access points. Additionally, the Project includes a fire access road around the majority of the proposed residential development that would follow the boundaries of adjacent development. The Project would not include the development of any new off-site roadway infrastructure. Additionally, the Project includes the development of residential uses that are substantially similar to other residential uses in the area. All aspects of the Project, including all access and circulation, would be designed and constructed to conform with all applicable City requirements. The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Therefore, Project impacts related to this issue would be less than significant.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. As stated above, current access to the Project Site is provided via two access points – one at the northeast corner of the site from Crenshaw Boulevard and the second at a south-central point of the site. The Project would maintain these two access points. Additionally, the Project includes a fire access road around the majority of the proposed residential development that would follow the boundaries of adjacent development. All aspects of the Project have been designed and would be constructed in accordance with the City's emergency access requirements. Thus, the Project would not result in inadequate emergency access. Therefore, Project impacts related to emergency access would be less than significant.

Cumulative Impacts

OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* states the following regarding cumulative traffic impacts:

> *Cumulative Impacts. A project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual 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." (Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).) When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance. (See Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 219, 223; CEQA Guidelines, § 15064, subd. (h)(3).)*

As discussed above, the Project is screened out from further VMT analysis, as it is presumed the Project would cause less-than-significant transportation impacts. For this reason, the Project's cumulative contribution to traffic impacts would also be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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	☐	☐	☐	☒
b. 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.	☐	☒	☐	☐

a) Would the project 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 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)?

No Impact. The Project Site is currently development with a government office building and associated landscaping and vehicle parking and does not contain any 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 in Public Resources Code section 5020.1(k). Thus, the Project would not 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 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). Therefore, no impacts related to this issue would occur as a result of the Project.

b) Would the project 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 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?

Less Than Significant With Mitigation Incorporated. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to tribal cultural resources as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration (or other similar CEQA document) on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

Pursuant to AB 52, the City notified Native American tribes of the Project with a 30-day consultation period on November 8, 2023. The Gabrieleno Band of Mission Indians - Kizh Nation responded to the City asserting that the Project Site could contain unknown tribal cultural resources and requested that monitoring be conducted during the Project's ground-disturbing activities. Mitigation Measures TCR-1 through TCR-3 listed below shall be implemented by the Project to ensure that the Project would not 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 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. Therefore, with mitigation, Project impacts related to tribal cultural resources would be less than significant.

None of the tribes responded to the request for consultation. As discussed in response to Checklist Question 5(b), based on a records search conducted by the South Central Coast Information Center, 11 archaeological sites have been recorded within a 0.5-mile radius of the Project site, and no sites have been recorded at the Project site; no resources have been identified at the Project site (refer to Appendix F). During the Project's construction phase, excavation of the Project site to approximately 40 feet below ground surface would occur to develop the proposed subterranean parking levels. It is possible that unknown Tribal Cultural Resources could exist at the Project site that could be encountered within the underlying alluvium, given the relative sensitivity of the Project region. Nonetheless, the Project Applicant would be required to implement the City's Condition of Approval related to the inadvertent discovery of Tribal Cultural resources outlined above, which would ensure that Project impacts related to unknown Tribal Cultural resources would be less than significant.

Mitigation Measures

To ensure that Project impacts related to unknown tribal cultural resources would be less than significant, the following mitigation measures have been incorporated into the Project:

TCR-1: The Applicant 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 Project Site 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.

A copy of the executed monitoring agreement shall be submitted to the City 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.

The monitor shall complete daily monitoring logs that shall 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 shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall

be provided to the Applicant and/or Lead Agency upon written request to the Tribe.

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 Applicant 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 that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh tribal cultural resources.

TCR-2: Upon discovery of any tribal cultural resources, 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 tribal cultural resources have been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered tribal cultural resources 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-3: If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with Mitigation Measures TCR-1 through TCR-3 and existing regulations, Project impacts associated with historic, archaeological, and paleontological resources would be less than significant. However, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant tribal cultural resources impacts that could occur at the sites of the related projects. As such, the proposed Project would not contribute to any potential cumulative impacts related to cultural resources.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Would the project require or result in relocation or the construction of new or expanded water, wastewater treatment, or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. As discussed below, Project impacts related to these issues would be less than significant.

Water Facilities

Local water conveyance infrastructure in the vicinity of the Project Site is maintained and operated by the City. The Project would connect to the existing water conveyance

infrastructure near the Project Site. As shown in Table XIX-1, the Project's operational phase would result in a net consumption of approximately 33,618 gallons of water per day (or 0.03 mgd). It should be noted that this amount does not take into account the reduction in water consumption associated with the effectiveness of water conservation measures required in accordance with the California Green Building Standards Code, which would likely reduce the Project's water consumption (and wastewater generation) shown in Table XIX-1.

Table XIX-1
Estimated Project Water Consumption and Wastewater Generation[1]

Proposed Use	Amount	Rate[2]	Total (gpd)
Existing			
Office	60,913 sf	200 gpd/1,000 sf	12,182
Project			
Residential			
Studio	36 du	100 gpd/du	3,600
1-bedroom	106 du	150 gpd/du	15,900
2-bedroom	109 du	200 gpd/du	21,800
3-bedroom	18 du	250 gpd/du	4,500
		Total Project	***45,800***
		(Less Existing)	*(12,182)*
		Net Total	**33,618**

gpd = gallons per day *sf = square feet* *du = dwelling unit*

[1] *Assumes wastewater generation is equivalent to water consumption.*
[2] *Source: 2325 Crenshaw Boulevard, Sewer Study, Appendix A, Psomas, June 9, 2023. Refer to Appendix L.*

For these reasons, the Project would not require or result in relocation or the construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project impacts related to water facilities would be less than significant.

Cumulative Impacts

Implementation of the six related projects listed in Appendix A in concert with the Project could result in an increased cumulative on water conveyance infrastructure. Table XIX-2 shows that the cumulative development would consume approximately 86,422 gallons of water per day (or 0.08 mgd per day). None of the related projects share water conveyance infrastructure in common with the Project. As with the Project, the applicants of the related

projects are subject to review by the City to ensure that existing infrastructure would be adequate to meet the water demand requirements for each project. All development in the City is subject to standard requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Compliance with existing standard regulations would ensure that cumulative impacts related to water infrastructure would be less than significant.

Table XIX-2
Estimated Cumulative Water Consumption and Wastewater Generation[1]

Land Uses	Size	Rate[2]	Total (gpd)
Residential	283 du[3]	150 gpd/du	42,450
Retail	26,800 sf	100 gpd/1,000 sf	2,680
Office	14,900 sf	200 gpd/1,000 sf	1,490
Hotel	34 rooms	150 gpd/room	5,100
Warehouse	43,377 sf	25 gpd/1,000 sf	1,084
		Subtotal	***52,804***
		Plus Project	*33,618*
		Total	**86,422**

gpd = gallons per day *du = dwelling unit* *sf = square feet*

1 *Assumes wastewater generation is equivalent to water consumption.*
2 *Source: 2325 Crenshaw Boulevard, Sewer Study, Appendix A, Psomas, June 9, 2023. Refer to Appendix L.*
3 *Assumes all units in related projects are 2-bedroom units.*

Wastewater Treatment

Less Than Significant Impact. A sewer study was performed by Psomas to evaluate the capacity of the existing sewer infrastructure to meet the demands of the Project (refer to Appendix L). The sewer study concluded that a sewer line upgrade from 12 inches to 15 inches would be required to meet the sewer discharge demands of the Project. The lateral extent of the sewer line upgrade would be along the west edge of Crenshaw Boulevard from 230th Street to 233th Street, approximately 1,200 feet in length, joining the existing 15-inch sewer downstream of 233rd Street.

It is anticipated that the construction of the upsized sewer line would require at least one southbound lane closure due to the existing sewer main location within Crenshaw Boulevard. In order to keep a sewer line operational at all times, a temporary 12-inch bypass line may be constructed to maintain sewer connectivity while the existing 12-inch line is being removed and replaced with the new 15-inch permanent sewer line. This is likely to be constructed in phases and with planned sequencing and overlapping construction activities. Each segment may be completed within a two-week period lasting

a total of approximately four months for the full sewer upgrade. With the sewer line upgrade, the sewer conveyance infrastructure would be adequate to serve the Project.

The Project Site is located within the service area of the Sanitation Districts of Los Angeles County – Joint Water Pollution Control Plant (JWPCP). The JWPCPC provides both primary and secondary treatment for approximately 260 million gallons of wastewater per day (mgd), and has a total permitted capacity of 400 mgd.[79] The Project would generate a net increase of approximately 33,618 gallons of wastewater per day (or 0.03 mgd) (refer to Table XIX-1), representing approximately 0.02 percent of the remaining wastewater treatment capacity of 140 mgd. It should be noted that this amount does not take into account the net reduction in wastewater generation associated with the effectiveness of water conservation measures required in accordance with the California Green Building Standards Code, which would likely reduce the Project's water consumption and wastewater generation shown in Table XIX-1. With a remaining daily capacity of 140 mgd, the JWPCP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

Implementation of the 6 related projects listed in Appendix A in concert with the Project could result in an increase the need for wastewater treatment. Table XIX-2 shows that the cumulative development in the Project Site area could result in the need to treat approximately 86,422 gallons of wastewater per day (or 0.08 mgd per day), representing approximately 0.06 percent of the remaining wastewater treatment capacity. It should be noted that this amount does not take into account the net decrease in wastewater generation that would occur as a result of removal of existing uses or the effectiveness of water conservation measures required in accordance with the California Green Building Standards Code, both of which would likely substantially reduce the cumulative water consumption and wastewater generation shown in Table XIX-2. With a remaining treatment capacity of approximately 140 mgd, the JWPCP would have adequate capacity to accommodate the wastewater treatment requirements of cumulative development. No new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater impacts would be less than significant.

Storm Water Drainage

Less Than Significant Impact. As discussed in response to Checklist Question X(c)(iii) (Hydrology and Water Quality – Storm Drain Capacity), in its existing condition, the Project Site is 78 percent impervious, and stormwater on the site flows to gutters and is collected by various catch basins. Under post-Project conditions, the imperviousness of the Project Site would be reduced to 71 percent impervious. As shown in Table X-1, the

79 *Los Angeles County Sanitation Districts, Joint Water Pollution Control Plant, https://www.lacsd.org/services/wastewater-sewage/facilities/joint-water-pollution-control-plant/wastewater-treatment-process-at-jwpcp#:~:text=Operation,permitted%20capacity%20of%20400%20mgd., accessed February 20, 2023.*

Project would result in reduced flows to the local storm drain. The City uses the Los Angeles County Department of Public Works Hydrology Manual for designing and hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements. Runoff would follow new discharge paths and drain to on-site storm drain infrastructure, including catch basins, planter drains, building roof drain downspouts, etc., throughout the Project Site. The rate and amount of stormwater runoff would be controlled through this on-site BMP infrastructure and could be accommodated by the City's existing storm drain system. Thus, the Project would not require upgraded storm drain capacity. Therefore, Project impacts related to storm drainage would be less than significant.

Cumulative Impacts

The sites of the Project and the related projects are located in an urbanized area where the sites themselves and most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs it generally does not lead to substantial additional runoff, since new development is required to control the amount and quality of stormwater runoff coming from their respective sites. Therefore, Project cumulative impacts related to storm drainage would be less than significant.

Electrical Power

Less Than Significant Impact. As discussed in response to Checklist Questions VII(a) and (b) (Energy), SCE provides electricity to the Project Site. The Project would connect to existing facilities in the public right-of-way and would not require new or expanded electric power facilities other than local connections to the existing electricity grid. Therefore, Project impacts related to electrical power would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Natural Gas

No Impact. The Project would be all electric and would not use natural gas. Therefore, no Project impacts related to natural gas would occur as a result of the Project.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Telecommunications

Less Than Significant Impact. In the Project Site area, existing telephone service is typically provided by AT&T, and existing cable television/internet is typically provided by Spectrum (formerly Time Warner Cable). The Project Site could be served by existing telecommunications facilities that are available in the Project Site area. The Project would require Project- and site-specific infrastructure to connect to the existing utilities, but the Project would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

Cumulative Impacts

All of the related projects listed in Appendix A represent infill development and are served by existing utilities, including telecommunications infrastructure. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related projects would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. The TMW provides water service to the Project Site. LADWP's water supply sources include imported water from the Metropolitan Water District (MWD); groundwater produced from the West Coast Basin; desalinated groundwater produced from the Goldsworthy Groundwater Desalter; and recycled water produced at the West Basin Municipal Water District's (WBMWD) Edward C. Little Water Recycling Facility in El Segundo.

The California Urban Water Management Planning Act of 1984 requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (AFY) of water to prepare an Urban Water Management Plan (UWMP) every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years. In the UWMP, the water supplier must describe the water supply projects and programs that may be undertaken to meet the total water use of the service area. The UWMP that is applicable to the Project is TMW's 2020 UWMP.

The 2020 UWMP provides historical and forecasted water demands for TMW's service area. Total water demand varies annually and is contingent on various factors including population growth, weather, water conservation, drought, and economic activity. Table XIX-3 shows a historical water supply summary for TMW from 2016 to 2020. Tables XIX-4, XIX-5, and XIX-6 provide TMW's projected water demand from 2025 to 2045 for normal, single-dry year, and multi-dry year hydrological conditions, respectively.

Table XIX-3
2016-2020 Water Supply Summary (AF)

Year	Imported	Ground	Desalinated Ground	Recycled Water	Total
2016	16,471	694	297	4,628	22,090
2017	15,579	1,851	0	5,908	23,338
2018	14,560	1,896	1,420	6,603	24,479
2019	14,440	2,035	1,674	5,382	23,528
2020	14,831	1,662	2,710	5,169	24,372
Average	**15,176**	**1,628**	**1,220**	**5,538**	**23,561**

AF = acre feet

Source: 2020 City of Torrance Urban Water Management Plan.

Table XIX-4
Projected Normal Water Supply and Demand (AF)

	2025	2030	2035	2040	2045
Supply totals	36,793	36,793	36,793	36,793	36,793
Demand totals	24,573	25,008	25,325	25,646	26,540
Difference	12,220	11,785	11,468	11,147	10,253

AF = acre feet

Source: 2020 City of Torrance Urban Water Management Plan.

Table XIX-5
Projected Single-Dry Year Water Supply and Demand (AF)

	2025	2030	2035	2040	2045
Supply totals	36,793	36,793	36,793	36,793	36,793
Demand totals	26,667	27,139	27,483	27,832	28,802
Difference	10,125	9,653	9,309	8,961	7,991

AF = acre feet

Source: 2020 City of Torrance Urban Water Management Plan.

Table XIX-6
Projected Multi-Dry Year Water Supply and Demand (AF)

		2025	2030	2035	2040	2045
First Year	Supply totals	36,793	36,793	36,793	36,793	36,793
	Demand totals	26,058	26,519	26,822	27,196	28,144
	Difference	**10,735**	**10,274**	**9,938**	**9,597**	**8,649**
Second Year	Supply totals	36,793	36,793	36,793	36,793	36,793
	Demand totals	27,431	27,916	28,270	28,629	29,626
	Difference	**9,362**	**8,877**	**8,523**	**8,164**	**7,166**
Third Year	Supply totals	36,793	36,793	36,793	36,793	36,793
	Demand totals	27,660	28,150	28,507	28,868	29,874
	Difference	**9,133**	**8,643**	**8,286**	**7,925**	**6,919**
Fourth Year	Supply totals	36,793	36,793	36,793	36,793	36,793
	Demand totals	28,108	28,606	28,969	29,336	30,358
	Difference	**8,684**	**8,187**	**7,824**	**7,457**	**6,434**
Fifth Year	Supply totals	36,793	36,793	36,793	36,793	36,793
	Demand totals	24,234	24,663	24,975	25,292	26,173
	Difference	**12,559**	**12,130**	**11,818**	**11,501**	**10,619**

AF = acre feet

Source: 2020 City of Torrance Urban Water Management Plan.

More frequent and longer-lasting dry periods, regulatory constraints, and seismic risks that can result in water delivery system outages are causing increased stress on water supply reliability. As such, in preparation to take reasonable actions to balance water demands with limited water supplies, TMW has prepared a Water Shortage Contingency Plan (WSCP) that outlines a set of actions that the City can take in the event of a declared water supply shortage or emergency situation. The City has three standard water shortage levels and response actions, as summarized in Table XIX-7. Under state law, TMW has the authority to implement the water shortage actions outlined in the WSCP. In all water shortage cases, shortage response actions to be implemented are at the discretion of TMW based on an assessment of the supply shortage, customer response, and the need for demand reductions. Upon proclamation by the Governor of a state of emergency under the California Emergency Services Action based on extended dry conditions, the state will defer to implementation of locally adopted water shortage contingency plans to the extent practicable. TMW will coordinate with regional and local water suppliers for which it provided water supply services for a possible proclamation of a local emergency, as necessary.

Table XIX-7
Water Shortage Reduction Targets

City of Torrance Shortage Levels			Mandated Standard Shortage Levels	
Shortage Level	**Restriction Type**	**% Shortage**	**Shortage Level**	**% Shortage**
Permanent Water Conservation Requirements	Mandatory	In effect at all times	1	Up to 10%
Level 1	Mandatory	≤15%	2	Up to 20%
Level 2	Mandatory	15% to 30%	3	Up to 30%
Level 3	Mandatory	>30%	4	Up to 40%
			5	Up to 50%
			6	>50%

Source: 2020 City of Torrance Urban Water Management Plan.

As discussed under Checklist topic XIV (Population and Housing), the Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS. Based on its 2020 UWMP, TMW has supply capabilities that would be sufficient to meet expected demands from 2025 through 2045 under single dry-year and multiple dry-year hydrologic conditions.

The Project would connect to the existing water conveyance infrastructure near the Project Site. As shown in Table XIX-1, the Project would consume a net increase of approximately 33,618 gallons of water per day. As discussed previously in this document, the Project is consistent with the City's General Plan land use designation for the Project Site. Additionally, the Project Applicant would be required to comply with applicable water efficiency standards outlined in California Green Building Code to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with the City to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not require new or additional water supply or entitlements. Therefore, no significant Project impacts related to water supply would occur.

Cumulative Impacts

Table XIX-2 shows that the cumulative development would consume approximately 86,422 gallons of water per day (or 0.08 mgd per day). As discussed previously, TMW's 2020 UWMP anticipates meeting projected water supplies through the year 2045, through conservation measures for drought years, and TMW's water shortage response actions identified (refer to Table XIX-6). Similar to the Project, the related project would be required to comply with conservation programs for both water supply and infrastructure. For these reasons, cumulative impacts related to water supply would be less than significant.

c) Would the project 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?

Less Than Significant Impact. Refer to response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

Cumulative Impacts

Refer to the cumulative impacts discussion included in response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

d) Would the project 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?

Less Than Significant Impact. The closest Los Angeles County landfill to the Project Site is the Savage Canyon Landfill located approximately 29 miles northeast of the Project Site. The Savage Canyon Landfill currently receives approximately 285 tons of solid waste per day and is permitted to accept 350 tons per day; it has a remaining permitted capacity of approximately 65 tons of solid waste per day and is permitted to operate through 2055.[80]

The City requires that all commercial and some residential construction, demolition, or remodeling projects recycle or reuse at least 65 percent of the materials that leave a project site, as well as 100 percent of excavated soil and land-clearing debris and any universal waste.[81] The Project Applicant would be required to submit a Waste Management Plan to the City's Building Department to demonstrate recycling of demolition and construction materials. Thus, Project construction would not generate excessive solid waste.

As shown in Table XIX-8, it is estimated the Project would generate a net increase of approximately 0.39 tons of solid waste per day. This total is a conservative estimation and does not account the reduction in solid waste associated with the effectiveness of recycling efforts, which the Project would be required by the City to implement. With a remaining daily intake capacity of approximately 65 tons of solid waste per day, the landfills serving the City could accommodate the Project's approximately net increase of 0.39 tons of solid waste per day.

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80 *Countywide Summary Plan and Countywide Site Element, Los Angeles County, October 2021.*

81 *City of Torrance Public Works, https://www.torranceca.gov/our-city/public-works/residential-trash-and-recycling/construction-and-demolition-material-recycling#:~:text=The%20City%20of%20Torrance%20requires,debris%20and%20any%20universal%20waste., accessed March 1, 2023.*

Table XIX-8
Estimated Project Solid Waste Generation

Proposed Use	Amount	Rate[1]	Total (tpd)
Existing			
Office	60,913 sf	0.005 lbs/sf/day	0.15
Project			
Residential	272 du	4.0 lbs/du/day	0.54
		Total Project	***0.74***
		(Less Existing)	*(0.15)*
		Net Total	**0.39**

tpd = tons per day lbs = pounds sf = square feet du = dwelling unit

[1] *Source: City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981.*

Additionally, the Project would be required to comply with the City's Commercial and Multi-Family Residential Trash & Recycling requirements. Recycling bins would be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable materials. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. For these reasons, the Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, and would not otherwise impair the attainment of solid waste reduction goals. Therefore, Project impacts related to solid waste would be less than significant.

Cumulative Impacts

As shown in Table XIX-79 implementation of the Project in conjunction with the related projects in the Project Site area would result in an estimated solid waste generation of approximately 1.2 tons per day. It should be noted that this amount does not take into account the net decrease in solid waste generation that would occur as a result of the removal of existing uses or the effectiveness of recycling measures required in accordance with existing City's recycling regulations, both of which would likely substantially reduce the cumulative solid waste generation shown in Table XIX-9.

Table XIX-9
Estimated Cumulative Solid Waste Generation

Land Uses	Size	Rate[1]	Total (tpd)
Residential	283 du	4.0 lbs/du/day	0.56
Commercial	102,077 sf	0.005 lbs/sf/day	0.25
		Subtotal	***0.81***
		Plus Project	*0.39*
		Total	**1.2**

tpd = tons per day du = dwelling unit sf = square feet

[1] *Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.*

With a remaining daily capacity of approximately 65 tons of solid waste per day, the landfills serving the Project and related project would have adequate capacity to accommodate cumulative solid waste generation. Additionally, all development in the City is require to comply with City and state recycling regulations. Therefore, cumulative impacts related to solid waste generation would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. All solid waste-generating activities within the City are subject to the requirements set forth in Section 5.408.1 of the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 75 percent of the nonhazardous construction and demolition waste and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. The Project would comply with the City's recycling requirements, which ensure consistency with state regulaitons for waste reduction. Thus, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, Project impacts related to this issue would be less than significant.

Cumulative Impacts

As stated above, all solid waste-generating activities within the City are subject to the requirements set forth in Section 5.408.1 of the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 75 percent of the nonhazardous construction and demolition waste and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. All cumulative development would comply with the City's recycling requirements, which ensure consistency with state regulaitons for waste reduction. Thus, cumulative development would comply with federal, state, and local management and reduction statutes and

regulations related to solid waste. Therefore, cumulative impacts related to this issue would be less than significant.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or uncontrolled spread of a wildfire?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not expose project occupants to, pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. Therefore, no impacts related to this issue would occur as a result of the Project.

c) Requires 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?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

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?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Neither the Project Site nor any of the sites of the related projects are located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Therefore, no cumulative impacts related to this issue would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐
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)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Does the project have the potential 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?

Less Than Significant With Mitigation Incorporated. As discussed in this document, the Project would not have the potential 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. As discussed in response to Checklist Question IV(a) (Biological Resources – Protected Species), with implementation of Mitigation Measure BIO-1, Project impacts related to nesting birds would be less than significant. Additionally, as discussed in

response to Checklist Question V(b) (Cultural Resources – Archaeological Resources), with implementation of Mitigation Measure CULT-1, Project impacts related to unknown archaeological resources would be less than significant. Further, as discussed in response to Checklist Question XVIII (a) (Tribal Cultural Resources), with implementation of Mitigation Measures TCR-1 through TCR-3, Project impacts related to unknown tribal cultural resources would be less than significant. Thus, the Project would not have the potential to eliminate important examples of the major periods of California history or prehistory.

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)?

Less Than Significant Impact. For the reasons stated in this IS/MND, the Project would not result in any significant impacts would not have the potential to contribute to significant cumulative impacts.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant With Mitigation Incorporated. As discussed in response to Checklist Question IX(B) (Hazards and Hazardous Materials – Release of Hazardous Materials) and in response to Checklist Question XIII(a) (Noise – Increase in Noise), with implementation of Mitigation Measures HAZ-1 and NOISE-1, respectively, the Project would not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.