

Honorable Mayor and Members
of the City Council
City Hall
Torrance, California

Members of the Council:

SUBJECT: City Council consideration of the City of Torrance 2009 Draft General Plan and Environmental Impact Report (EIR).

Expenditure: None

RECOMMENDATION

Recommendation of the Community Development Director that the City Council conduct a workshop to receive public comments and for the City Council to provide direction to staff on the 2009 Draft General General Plan and Environmental Impact Report (EIR).

Funding

Not applicable

BACKGROUND

The General Plan is the City's vision that contains the long-range goals, principles and policies that guide the physical development of the city. The document contains seven mandated elements or chapters: land use, circulation, conservation, open space, safety, noise, and housing, but also may contain other subjects that are relevant to the physical development of the city. The General Plan is periodically updated and amended to adjust to population changes, housing needs, and community's needs that may fluctuate over time. The Housing Element, which outlines the city's housing goals, strategies, and needs, shall be updated every five years in accordance with State law, unless such timeline is otherwise extended by the State legislation.

In the summer of 2004, the City of Torrance commenced the update of the General Plan, which was last revised in 1992. The update was to include the Land Use, Circulation, Conservation, Open Space, Parks and Recreation, Safety, and Noise elements. The update of the Housing Element, which was last done in 2001, was added in 2006. Consultants were hired to assist in the preparation of the General Plan and Environmental Impact Report (EIR) documents.

Between February 2005 and October 2009, twenty public General Plan Update workshops were conducted by the Planning Commission or Environmental Quality and Energy Conservation Commission. In addition to these public workshops, additional workshops were also held with the Environmental Quality and Energy Conservation, Traffic, Community Service, Library, Parks and Recreation, Cultural Arts, and Water Commissions, Commission on Aging, Youth Council, and the Disaster Council. The General Plan consultant conducted one-on-one interviews with the City Council, city executive staff, homeowners coalition representatives, school district officials, various members of the business community, and the League of Women Voters.

On June 4, 2005 at the City Yard Open House, an exhibit was set up to allow residents to share their thoughts and ideas as they related to the General Plan. Over two hundred residents learned about the update process and participated in exercises that allowed them to express issues of concern. In 2007, a series of meetings with the Homeowners coalition and homeowner association groups were held to solicit their input and concerns in their respective neighborhoods.

During the General Plan public workshops, the Planning Commission and members of the public had the opportunity to comment on the proposed goals, objectives, policies, and implementation programs of the Draft General Plan. The comments that were received were used to help draft each element. Over the past year, the Planning Commission reviewed drafts of individual elements as well as a draft of the entire General Plan document and Environmental Impact Report. At a public hearing on October 28, 2009, the Planning Commission recommended that the City Council:

1. Certify the Final Environmental Impact Report for the City of Torrance General Plan, and
2. Adopt the Findings of Fact and Statement of Overriding Consideration regarding the Final Environmental Impact for 2009 General Plan, and
3. That the Draft General Plan be forwarded to the City Council for review, noting concerns and comments expressed by the Planning Commissioners and the public as stated in the minutes and including the following amendments:
 - A) General Plan, Objective C1.8: Add Policy No. C1-8.10: Pursue acquisition of abandoned rail lines for use as multi-purpose trails, alternative transportation, or other use as determined by City decision makers;
 - B) Housing Element, Page H-93, Chapter 1.1.2: Replace the word "eleemosynary" with "charitable.";
 - C) Incorporate language changes into the Housing Element based on negotiations with the California Department of Housing and Community Development (HCD);
 - D) Incorporate the list of modifications proposed in the matrices for the last two Planning Commission workshops.

ANALYSIS

The 2009 Draft General Plan represents a culmination of a five-year collaborative community effort. The document is the result of extensive outreach to the community and deliberation by the Planning Commission. An overview of some of the key changes from the previous General Plan and additions are highlighted below.

Through the series of public workshops, interviews with community members, and careful examination, seven study areas were initially identified as areas in transition, experiencing stagnation, or in need of reinvestment: 1) Crenshaw/Amsler, 2) Western Avenue South, 3) Border Avenue, 4) Western Avenue North, 5) Redondo Beach Boulevard, 6) Jefferson/Oak, and 7) East Victor Precinct. After further consideration, the land use alternative for the East Victor Precinct were withdrawn because the current land uses were determined to be functioning effectively. The remaining six areas were seen as opportunities to enact positive change through land use policy. Due to the City being primarily built out and the lack of vacant land, enhancement of these transitional areas would be encouraged. The land area, which these six study areas encompass, represents less than two percent of the total area of the City.

Under the proposed General Plan, two new land use designations are being introduced the Residential-Office and the Hospital/Medical. The Residential-Office designation is envisioned to allow neighborhood compatible commercial uses, multiple-family residences, and mixed-use commercial and residential development and serve as a transitional area between established residential neighborhoods and commercial and industrial areas. The Hospital/Medical designation will promote the orderly expansion of hospital and medical facilities. The Local Commercial designation, which was intended for neighborhood serving commercial, is proposed to be eliminated and incorporated into the General Commercial and Residential-Office designations. Though Local Commercial was designed to facilitate neighborhood compatibility and pedestrian oriented development, the restrictive maximum floor area ratio of 0.40 encouraged automobile oriented uses, such as gas stations and drive-through restaurants.

To resonate and reinforce the distinct characteristics and vision of the City's residential neighborhoods identified by Torrance residents, the General Plan includes a profile of six neighborhood districts: 1) North Torrance, 2) Old Torrance, 3) Central Torrance, 4) West Torrance, 5) South Torrance, and 6) The Hillside.

The Conservation, Parks and Recreation, and Open Space elements have been incorporated into one Community Resources Element. In addition, this element covers educational, cultural, historic, aesthetic, water resources, wildlife protection, energy conservation, and emerging issues such as climate change, green house gas emissions, and green building initiatives. Policies and implementation programs for historic preservation were also strengthened.

The allowable density range permitted under the Medium Density Residential land use designation will be amended from 18 to 28 dwelling units per acre to 18 to 31 dwelling units per acre to coincide with State guidelines for affordable housing. This density change will help demonstrate to the State of California Housing and Community Development Department that the City is working towards achieving the Southern California Association of Governments (SCAG) Regional Housing Needs Assessment (RHNA) allocation for low income housing, which in turn would help in obtaining a Certified Housing Element.

Environmental Impact Report

A Program Environmental Impact Report (EIR) was prepared for the 2009 General Plan in accordance with California Environmental Quality Act (CEQA). An analysis of the potential environmental impacts associated with the implementation of the General Plan found that the project would cause significant and unavoidable impacts in the categories of air quality and noise. For the significant and unavoidable impacts, the lead agency (City Council) must adopt Findings of Fact and Statement of Overriding Considerations. Impacts related to greenhouse gas emission and traffic would be less than significant with the incorporation of mitigation measures. All other potential environmental impacts were determined to be less than significant.

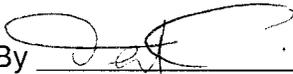
Recommendation

For the November 10, 2009 City Council meeting, the Community Development Director recommends that the City Council conduct a workshop to receive public comments and for the City Council to provide direction to staff on any specific issues that the Council may have

regarding the 2009 Draft General General Plan and Environmental Impact Report (EIR) prior to the public hearing on November 17, 2009. In order for the Council's comments to be incorporated and issues addressed in the final draft of the General Plan, staff requests that any specific concerns and potential changes the Council may have are clearly stated during the workshop. Identifying any proposed amendments to the Draft General Plan on November 10, 2009, will assist the Council in making their motion and vote should they choose to on the November 17, 2009 meeting.

Respectfully submitted,

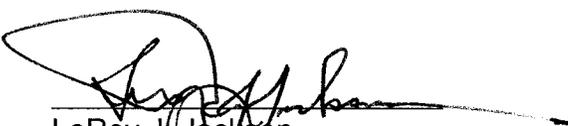
JEFFERY W. GIBSON
Community Development Director

By 
Ted Semaan, Manager
Redevelopment & General Plan Divisions

CONCUR:


Jeffery W. Gibson
Community Development Director

NOTED:


LeRoy J. Jackson
City Manager

Attachments:

- A. Draft 2009 General Plan (Electronic copy or hard copy was previously distributed to City Council via memo dated August 27, 2009 with a copy made available at City Clerk's office and on City's website)
- B. Environmental Impact Report (Electronic copy or hard copy was previously distributed to City Council via memo dated August 27, 2009 with a copy made available at City Clerk's office and City's website)
- C. Environmental Impact Report Response to Comments and Revisions
- D. Findings of Fact and Statement of Overriding Considerations
- E. Mitigation Monitoring Program
- F. Frequently Asked Questions
- G. Correspondence
- H. Previous General Plan workshop materials (Limited Distribution)

Draft 2009 General Plan (Electronic copy or hard copy was previously distributed to City Council via memo dated August 27, 2009 with a copy made available at City Clerk's Office and on City's website)

ATTACHMENT B

Environmental Impact Report (Electronic copy or hard copy was previously distributed to City Council via memo dated August 27, 2009 with a copy made available at City Clerk's Office and City's website)

FINAL

**ENVIRONMENTAL
IMPACT REPORT
FOR
TORRANCE GENERAL
PLAN UPDATE**

SCH NO. 2008111046



prepared for:

CITY OF TORRANCE

Contact:
Ted Semaan
General Plan and
Redevelopment
Manager

prepared by:

**THE PLANNING
CENTER**

Contact:
William Halligan, Esq.
Vice President,
Environmental Services

OCTOBER 2009

SCH #2008111046
DRAFT EIR CIRCULATED: July 23, 2009 to September 8, 2009
FINAL EIR CERTIFIED:

FINAL

**CITY OF TORRANCE
GENERAL PLAN
UPDATE
ENVIRONMENTAL
IMPACT REPORT**

SCH NO. 2008111046



prepared for:

CITY OF TORRANCE

*City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503*

*Contact::
Ted Semaan
General Plan and
Redevelopment
Manager*

prepared by:

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*Contact::
William Halligan, Esq
Vice President,
Environmental Services*

TOR-02.0E

OCTOBER 2009

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1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Administrative Code Section 15000 et seq.).

According to CEQA Guidelines, Section 15132, the FEIR shall consist of:

- (a) The Draft Environmental Impact Report (DEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the DEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the DEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DEIR for the City of Torrance General Plan during the public review period, which began July 23, 2009, and closed September 08, 2009. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DEIR comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.



1.2 FORMAT OF THE FEIR

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and content of this FEIR.

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the DEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A-1 through A-3 for letters received from agencies and organizations, and R-1 through R-4 for letters received from residents). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

Section 3. Revisions to the Draft EIR. This section contains revisions to the DEIR text and figures as a result of the comments received by agencies and interested persons as described in Section 2, and/or errors and omissions discovered subsequent to release of the DEIR for public review.

The responses to comments contain material and revisions that will be added to the text of the FEIR. The City of Torrance staff has reviewed this material and determined that none of this material constitutes the

1. Introduction

type of significant new information that requires recirculation of the DEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the DEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of DEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

2. Response to Comments

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Torrance) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses.

This section provides all written responses received on the DEIR and the City's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the public review period.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Agencies & Organizations			
A1	California Department of Transportation – Caltrans District 7	September 3, 2009	2-5
A2	County Sanitation District of Los Angeles County	July 29, 2009	2-9
A3	Southern California Association of Governments	September 8, 2009	2-13
Residents			
R1	Leilani Kimmel-Dagostino	August 9, 2009	2-25
R2	Thomas Rische	Unknown	2-29
R3	Jose Santome	August 3, 2009	2-33
R4	Dave Sargent	August 4, 2009	2-39



2. Response to Comments

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2. Response to Comments

LETTER A1 – Caltrans (3 pages)

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7, REGIONAL PLANNING
 IGR/CEQA BRANCH
 100 MAIN STREET
 LOS ANGELES, CA 90012-3606
 PHONE (213) 897-6696
 FAX (213) 897-1337



*Max your power!
Be energy efficient!*

September 3, 2009

Ted Semaan - Plan and Redevelopment Manager
 Torrance Community Development Department
 3031 Torrance Boulevard, Torrance, CA 90503

City of Torrance General Plan update
 Draft Environmental Impact Report
 LOS / 110 / 3.26-9.87 405 / 12.97-18.23
 SCH No. 2008111046 IGR No. 090738/EK

Dear Ted Semaan:

We have received the Draft Environmental Impact Report (DEIR) for the City of Torrance General Plan update project. City area includes sections of two State Route surface roads, Pacific Coast Highway (SR-1) and Hawthorne Boulevard (SR-107), until such time as they may be relinquished to the City. Along the eastern City boundary is a section of State Route surface road Western Avenue (SR-213). The City is served for regional access by the State Route Harbor (I-110) and San Diego (I-405) freeways. Access is provided via an extensive freeway ramp system connecting the major arterial roads of Torrance to the freeways. For the California State Department of Transportation (Department), we have the following comments.

As you are aware, there is a critical relationship between land use and transportation. The quality of the State transportation system operation can affect the quality of the local circulation system operation. We therefore hope for good coordination of planning efforts between local agencies and the Department District 7. A1-1

In the report (p. 3-5), we noticed expected numerical increases in the City of Torrance Plan of dwelling units by 3,060, population by 7,820 and employment by 13,521, by year 2030.

In connection with these increases, we appreciate the attention given to mitigation for some effects of new trips on surface streets within the city limits. We have concerns about consideration of impacts beyond those boundaries, however, such as on surface streets and especially on freeway interchanges intersections. A1-2

Whatever influences the City might have over mitigation outside its borders, full accounting of effects would include documentation of distribution of new trips (origin and destination), to the extent that they significantly affect roads beyond city boundaries. Effects of significant traffic volume increases should be clearly indicated, as far as they geographically extend, according to stated assumptions on local sub-regional development. The Traffic Impact Analysis Report had all the new trip generation distributed only on 100 intersections within the city limits, not including any related to freeways facilities. A1-3

"Caltrans improves mobility across California"



2. Response to Comments

Ted Semaan
September 3, 2009
Page 2 of 2 pages

In our letter on the Notice of Preparation (dated December 4, 2008) we noted that capacities of local facilities and traffic controls to absorb freeway off-ramp traffic is important to prevent the safety hazard of backup of off-bound traffic onto freeway travel lanes. Improving off-take capacity might be an integral part of mitigation. In that respect we believe that intersections at or near the following freeway on- and off-ramps should be studied as appropriate, or at least mentioned in the Traffic Impact Analysis report, as they affect operation of the ramps:
> for I-110, all between and including Artesia Boulevard / SR-91 and SR-1 (P.C.H)
> for I-405, all between and including Western Ave. (/190th St.) and Redondo Beach Blvd.
Analysis should comply with HCM 2000 Methodology and LOS threshold.

A1-4

We have particular concern about where PM Peak backup onto freeway through-traffic lanes currently occurs -- southbound I-110 at SR-1 and northbound SR-405 at Crenshaw Boulevard (/ 182nd St.). Impacts at these places might potentially be rather significant. Although other sources would contribute, increased demand from Torrance could increase traffic impacts at these places. Even if they are unavoidable, we would appreciate mention of such impacts. Any suggestions for what might be done to prevent lengthening of time and distance of the backups on travel lanes would be appreciated, even if Torrance would not have direct control.

A1-5

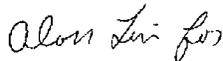
For off-ramp back-ups, could some mitigation alternatives be considered? We note here some generic alternatives, although they are only suggestions and not our recommendation, and you might discover some others that would be more effective or practical. They are: changes in traffic signal timing or type, increase of street lanes near the intersections, widening or other kinds of re-configuration of ramps. Even if physical location of mitigation were outside of Torrance city limits, we would appreciate suggestions or recommendations. Of course any mitigations should be coordinated with the Department.

Please note that we would welcome being involved in developing traffic mitigation agreements and arranging for monitoring, for projects. On all aspects of analysis for traffic on state facilities and potential mitigation, we offer to participate.

A1-6

If you have any questions regarding our comments in this letter, please refer to our internal Record Number 090738/EK. Please do not hesitate to contact our review coordinator Edwin Kampmann at (213) 897-1346 or to contact me at (213) 897-6696. Our E-mail addresses are edwin_kampman@dot.ca.gov and elmer_alvarez@dot.ca.gov .

Sincerely,



Elmer Alvarez
IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"

2. Response to Comments

A1. Response to Comments from Caltrans, dated September 3, 2009.

A1-1 Comment noted. As specific development proposals are brought forth in the City, and as designs are developed for improvements along Pacific Coast Highway (SR-1), Hawthorne Boulevard (SR-107), and the San Diego Freeway (Interstate 405), the City will, under its normal development review process, coordinate with Caltrans District 7.

A1-2 The General Plan analysis has been performed using typical evaluation methods appropriate for a general plan level of analysis. Traffic impact analyses required for individual development projects in the City would be required to identify the project study area where potential traffic impacts associated with the new development could occur. Traffic impacts identified by individual development projects in the City of Torrance would be required to implement or contribute to improvements in the adjacent cities impacted by the project. Future projects that contribute to impacts in adjacent cities would be required to assess their fair share traffic impacts. Likewise, development projects within adjacent cities will be required to implement or contribute to improvements in the City of Torrance.

Furthermore, to address the increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, Proposition 111 enacted the Congestion Management Program (CMP). The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by the MTA, the local CMP agency, to implement the statutory requirements of the CMP. The countywide approach includes designating a highway network that includes all state highways and principal arterials within the County and monitoring the network's LOS standards. Monitoring the CMP network is one of the responsibilities of local jurisdictions. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the countywide plan.

The CMP for the County of Los Angeles requires that all freeway segments where a project is expected to add 150 or more trips in any direction during the peak hours be analyzed. An analysis is also required at all CMP intersections where a project would likely add 50 or more trips during the peak hours. Therefore, impacts and mitigation for regional transportation systems will be addressed as individual development projects occur in the future.

A1-3 See Response A1-2.

A1-4 The General Plan analysis has been performed using typical evaluation methods appropriate for a general plan level of analysis. As specific development proposals are brought forth, the City will require analysis of state transportation facilities using the Highway Capacity Method (HCM) as part of its existing development review process.

A1-5 See Response A1-4.



2. Response to Comments

- A1-6 This requirement relates to specific development projects rather than the proposed General Plan Update. However, your comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration.

2. Response to Comments

LETTER A2 – County Sanitation District of Los Angeles County (1 page)



1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

1 ED
COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

STEPHEN R. MAGUIN
Chief Engineer and General Manager
AUG 03 2009
COMMUNITY DEVELOPMENT DEPT

July 29, 2009

File No: 05-00.04-00
30-00.04-00

Mr. Jeffery W. Gibson, Director
Community Development Department
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503

Dear Mr. Gibson:

Torrance General Plan Update

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Availability of a Draft Environmental Impact Report for the subject project on July 24, 2009. The City of Torrance is located within the jurisdictional boundaries of Districts Nos. 5 and 30. We offer the following comments regarding sewerage service:

- 1. *Page 5.16-11, Wastewater Generation, last paragraph:* The Joint Water Pollution Control Plant has a design capacity of 400 million gallons per day (mgd) and currently processes an average flow of 288.2 mgd. | A2-1
- 2. All other information concerning Districts' facilities and sewerage service contained in the document is current. | A2-2

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin

Ruth I. Frazen
Ruth I. Frazen
Customer Service Specialist
Facilities Planning Department



2. Response to Comments

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2. Response to Comments

A2. Response to Comments County Sanitation District of Los Angeles County, dated July 29, 2009.

A2-1 Per the commenter's request, Section 5.16, Utilities and Service Systems, p.5.16-11, last paragraph, second and third sentence, will be modified to read:

Wastewater generated in the City is transported to the JWPCP in Carson, which has current wastewater flows of about ~~320~~ 288.2 MGD (~~322,825~~), a maximum design flow of ~~385~~ 400 mgd (~~431,255~~ 448,056 afy), and a maximum design peak flow of 540 mgd (604,878 afy). The design capacity of the JWPCP is thus about ~~65~~ 111.8 mgd greater than the facility's current wastewater flows.

A2-2 The County Sanitation District comments that all other information concerning the District's facilities and sewerage service contained in the DEIR is current and correct. No response is necessary.



2. Response to Comments

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2. Response to Comments

LETTER A3 – Southern California Association of Governments (9 pages)



September 8, 2009
Mr. Jeffery Gibson
Community Development Director
City of Torrance
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Torrance, California 90503
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First Vice President: Larry McCallon, Highland
Second Vice President: Pam O'Connor, Santa Monica
Immediate Past President: Richard Dixon, Lake Forest
Executive/Administration Committee Chair: Jon Edney, El Centro
Policy Committee Chairs
Community, Economic and Human Development: Carl Morehouse, Ventura
Energy & Environment: Keith Hanks, Azusa
Transportation: Mike Ten, South Pasadena

RE: SCAG Comments on the Environmental Impact Report for the City of Torrance General Plan Update [SCAG No. I20090473]

Dear Mr. Gibson,

Thank you for submitting the Environmental Impact Report for the City of Torrance General Plan Update [SCAG No. I20090473] to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act (CEQA) Guidelines, Sections 15125 and/or 15206. The General Plan Update involves a revision to the land use map and a revision to six elements: Land Use, Circulation and Infrastructure, Community Resources, Safety, Noise, and Housing.

We have evaluated this project based on the policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Vision (CGV) that may be applicable to your project. The RTP and CGV can be found on the SCAG web site at: http://scag.ca.gov/igr. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. Please provide a copy of the Final Environmental Impact Report (FEIR) for our review. If you have any questions regarding the attached comments, please contact Bernard Lee at (213) 236-1800. Thank you.

Sincerely,
[Signature]
Jacob Lieb, Manager
Assessment, Housing & EIR

A3-1

DOCS# 152955

The Regional Council is comprised of 83 elected officials representing 189 cities, six counties, five County Transportation Commissions, Imperial Valley Association of Governments and a Tribal Government representative within Southern California.

6.16.09

2. Response to Comments

September 8, 2009
Mr. Gibson

SCAG No. I20090473

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF TORRANCE GENERAL PLAN UPDATE [SCAG NO. I20090473]

PROJECT LOCATION

The City of Torrance is in southwestern Los Angeles County, in the highly urbanized South Bay region. The South Bay consists of the cities and communities of Compton, Gardena, Carson, Redondo Beach, Palos Verdes Estates, Lomita, Rolling Hills Estates, Rancho Palos Verdes, San Pedro, Wilmington, Harbor City, portions of Long Beach, and Torrance.

Communities directly adjacent to Torrance include Rolling Hills Estates and Palos Verdes Estates to the south, Redondo Beach to the east, Gardena and Lawndale to the north, and Carson to the west. The Pacific Ocean forms a small portion of the western border of the City. Interstate 405 (I-405) transects the northern portion of the City, and provides regional access, along with I-110.

PROJECT DESCRIPTION

The proposed project is an update to the City of Torrance General Plan. This update involves a revision to the land use map and a revision to elements required by the State of California and two additional optional elements.

Overall, the proposed general plan proposes increases in the commercial, office and industrial square footage in the City from 60,891,740 square feet to 62,163,571 square feet, or an increase of 1,271,821 square feet. In addition, the number of residential units would increase from 54,476 to 57,536 and the total population would increase from 139,262 to 147,082.

The update of the general plan involves revisions to the current general plan land use map and to elements required by the State of California. The City of Torrance General Plan consists of the land use, circulation and infrastructure, community resources, safety, noise, and housing elements. The project also involves a public outreach program that includes a variety of community-wide and focused public participation components.

- Land Use Element: focuses on the built environment of Torrance, laying out the framework for balancing development with broader community aims.
- Circulation and Infrastructure Element: addresses issues, goals, and policies related to circulation, traffic management, parking management, public transit, walking, biking and trails, and airports. Water supply, wastewater, storm drainage, and utilities are also discussed.
- Community Resources Element: examines both natural resources and the open space and other community resources created, and establishes policies to protect those resources that distinguish and define Torrance. Parks, recreation, open space, community facilities, historic preservation, air quality, water resources and conservation, mineral resources, wildlife protection, energy conservation, aesthetic resources, and sustainable practices are addressed.
- Safety Element: identifies hazards present in the community, defines approaches the City has taken to provide proper planning, and discusses emergency responses available to mitigate the hazards. Emergency services, hazards, flood concerns, and geologic and seismic considerations are discussed.
- Noise Element: identifies community noise concerns and includes policies and programs to minimize noise impacts in Torrance.

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- **Housing Element:** specifies ways in which the housing needs of existing and future residents can be met. Torrance's housing element is updated every five to six years, pursuant to state law.

The proposed land use plan contains 14 land designations divided into residential, commercial, industrial, and public categories. Land use designations define the amount, type, and nature of future development that is allowed in a given location of the City.

- **Residential:** Five residential land use designations allow for a range of housing types and densities. The City also permits accessory units and nonresidential uses such as schools, parks, child day care, and religious and charitable organizations in these areas, consistent with state law and the Torrance Municipal Code.
- **Commercial:** Three commercial land use designations are designed to support business activity and provide tools to help businesses and districts maximize their economic potential. There are distinctions between commercial areas that serve surrounding neighborhoods and areas that serve the region. The largest concentration of commercial development is in the Del Amo Business District, an area along Hawthorne Boulevard bounded by Torrance Boulevard and Sepulveda Boulevard.
- **Industrial:** Torrance originally incorporated as a "modern industrial city," and industrial uses remain a large part of the City's identity. Large industrial areas include the Central Manufacturing District, and a second industrial district located in the southern portion of the City. A small concentration of industrial uses can also be found in the East Victor precinct.
- **Public and Medical:** Three land use designations provide for open space, land owned by public agencies and jurisdictions, and land owned by private entities for uses that serve the community, such as utilities.

Seven study areas were identified; however, further analysis revealed that only six of these study areas necessitated land use changes. Altogether, the land use designation changes in the study areas cover less than 1 percent of the total area in the City.

Several of the study areas have been in transition since the adoption of the City's 1992 general plan, and the proposed land use designations reflect land use changes that have occurred since. Land use changes in the study area aim to improve otherwise underused or poorly maintained areas that have not lived up to the potential envisioned in prior general plans.

Study Area 1 – Crenshaw/Amsler

This area consists of approximately 10 acres located at the City's eastern edge. The area is underutilized given its prime location along one of the City's major corridors and its proximity to Torrance Crossroads, a major shopping center. The area contains a mix of older business park and commercial uses.

Study Area 2 – Western Avenue South

Western Avenue forms the City's eastern boundary between Artesia Boulevard and 238th Street, and the study area extends along Western Avenue between Plaza Del Amo and 228th Street. Older offices and industrial and business uses are the predominant land uses along this portion of the Western Avenue corridor. The study area is surrounded on the west, south, and east by residential neighborhoods.

Study Area 3 – Border Avenue

Historically, Border Avenue has supported office and light industrial uses, with several small-lot homes interspersed within. Due to the small lot sizes and the presence of residential uses, the plan to create a business park environment has not been realized. The area is adjacent to a successful industrial district to the east and a residential neighborhood to the west.

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cont'd.



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Study Area 4 – Western Avenue North

Historical land uses include neighborhood commercial businesses and general commercial uses at major intersections. Issues in this area include the presence of outdated industrial and commercial properties, an influx of newer commercial and residential uses, and a need to develop a clear vision of how the corridor should develop over the next 20 years.

Study Area 5 – Redondo Beach Boulevard

Issues in this study area include the lack of gateways to signify entry to Torrance, shallow parcels, and underutilized commercial properties. The area includes a variety of land uses, including local-serving commercial, regional-service commercial, single-family residential, and institutional.

Study Area 6 – Jefferson/Oak

Historical uses within the study area include business park and heavy industrial. The study area is at the southeast corner of Carson Street and Crenshaw Boulevard, and is bounded by Jefferson Street to the south, and the Burlington Santa Fe railroad to the east.

A3-2
cont'd.

Study Area 7 – East Victor Precinct

Land use alternatives for this area were proposed; however, they were ultimately withdrawn in acknowledgement that current land uses in this study area functioned effectively. The study area experienced a transition from business park and industrial uses to commercial, residential, and medical use, which provides the city with employment and tax revenue.

Actions required by the Torrance City Council are to certify the General Plan Update EIR and adopt the General Plan.

CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

Regional Growth Forecasts

The Draft Environmental Impact Report (DEIR) should reflect the most current SCAG forecasts, which are the 2008 Regional Transportation Plan (RTP) Population, Household and Employment forecasts (adopted May 2008). The forecasts for your region, subregion and city are as follows:

Adopted SCAG Regionwide Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

Adopted SBCOG Subregion Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	913,321	934,398	952,278	969,641	986,683	1,002,927
Households	307,091	313,990	319,699	323,897	328,084	331,386
Employment	402,615	408,809	412,765	417,420	422,386	427,141

A3-3

Adopted City of Torrance Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	150,393	152,825	155,464	158,005	160,444	162,772
Households	56,409	57,266	58,170	58,875	59,556	60,116
Employment	107,277	109,092	110,252	111,615	113,071	114,464

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1. The 2008 RTP growth forecast at the regional, subregional, and city levels was adopted by the Regional Council in May 2008.

SCAG Staff Comments:

The DEIR utilizes the final 2008 RTP growth forecasts.

The 2008 Regional Transportation Plan (RTP) also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

SCAG Staff Comments:

SCAG staff finds the project generally meets consistency with RTP goals overall. RTP G2, G3, and G7 are not applicable to this project, since it is not a transportation project.

The proposed project generally meets consistency with RTP G1. Mobility pertains to the speed at which one may travel and the delay, or difference between the actual travel time and travel time that would be experienced if a person traveled at the legal speed limit. Accessibility measures how well the transportation system provides people access to opportunities, such as jobs, education, shopping, recreation, and medical care. Per page 5-15.20, five study intersections would be significantly impacted after buildout of the General Plan Update. However, after mitigation measures are applied, Table 5.15-7 (Mitigated Forecast Existing Plus Proposed General Plan Update Conditions AM & PM Peak Hour Intersection LOS), only one intersection would continue to perform at a substandard Level of Service (below D). With regard to accessibility, Circulation and Infrastructure Element Objective 1, outlined in Table 5.9-5 (Consistency with Compass Blueprint Regional Growth Principles), page 5.9-11, discusses integration with the regional transportation network. In addition, several Land Use Element objectives and policies mentioned in Table 5.9-5, such as 7 and 2.6, would promote greater accessibility through land use planning.

The proposed project generally meets consistency with RTP G4. Productivity is a system efficiency measure that reflects the degree to which the transportation system performs during peak demand conditions. Per Table 5.15-7 (Mitigated Forecast Existing Plus Proposed General Plan Update Conditions AM & PM Peak Hour Intersection LOS), one of the significantly impacted intersections would continue to perform at a Level of Service F during the PM peak hour.

The proposed project meets partial consistency with RTP G5. The General Plan Update intends to create a balanced transportation system and encourage the use of public transportation, biking, and walking. However, policies regarding the provision of adequate parking on page 5.15-25 may contradict the promotion of other transportation modes. Also, per page 5.2-26, significant and

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unavoidable air quality impacts would occur as it relates to conformance with the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan, SCAQMD thresholds for criteria pollutants during both construction and operational phases, and exposure of residential and other sensitive land uses to substantial concentrations of air pollutant emissions.

A3-3
cont'd.

The proposed project meets consistency with RTP G6. As discussed on pages 5.9-36 through 5.9-38, the General Plan Update intends to integrate land use and transportation planning, focus growth along major transportation corridors, and to target new development within walking distance of existing and planned transit stations.

GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

- GV P1.1 *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2 *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3 *Encourage transit-oriented development.*
- GV P1.4 *Promote a variety of travel choices*

SCAG Staff Comments:

A3-4

The proposed project generally meets consistency overall with Growth Visioning Principle 1.

The proposed project meets consistency with GV P1.1. As mentioned earlier, the General Plan Update intends to integrate land use and transportation planning, focus growth along major transportation corridors, and to target new development within walking distance of existing and planned transit stations.

The proposed project partially meets consistency with GV P1.2. Per Table 5.12-8 (Local, County, and Regional Jobs-Housing Ratios), the City of Torrance is expected to have a jobs-to-housing ratio of 1.9 by 2030 versus the County and region-wide ratio of approximately 1.3. Relative to the County and the Region, the City would have a much higher proportion of jobs and would require more housing to correct the imbalance.

With regard to GV P1.3, the proposed project meets consistency. As indicated on 5.9-37, the General Plan Update includes "Targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations."

The proposed project meets consistency with GV P1.4. One of the goals indicated under the Statement of Objectives on page 3-1 is "To encourage alternative modes of transportation, such as walking, bicycling and transit."

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Principle 2: Foster livability in all communities.

- GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2 *Promote developments, which provide a mix of uses.*
- GV P2.3 *Promote "people scaled," walkable communities.*
- GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

SCAG Staff Comments:

The proposed project meets consistency overall with Growth Visioning Principle 2.

The proposed project meets consistency with GV P2.1. Per page 5.9-37, "infill development and revitalization of older neighborhoods brings vitality back to communities in Torrance. Infill development is encouraged by land use objective LU.13, policies LU.13.1 through LU.13.4, and Housing Policy H.4.4."

With regard to GV P2.2 and P2.3, the proposed project meets consistency. Per page 5.9-37, "The general plan update would maintain and create areas that support mixed-use development, walkability, and a quality of life through the development of neighborhoods and communities that cater to people. The land use element contains a number of policies that encourage the use and development of public space to increase interaction and with design policies that improve way-finding and the visual character of neighborhoods. The community resources element also has a number of policies to improve the aesthetics and accessibility of public spaces. Examples of policies that would encourage this are land use objective LU.9, land use policies LU.9.1 through LU.9.5, LU.11.4, LU.11.5, and LU.11.7. Community resources element objectives CR.1 through CR.5 and their respective policies also guide development to improve the quality and use of public spaces."

The proposed project meets consistency with GV P2.4. Per page 5.9-37, "Torrance has a large percentage of land dedicated to single-family residential units. Nearly 40 per cent of all land use (not including rights-of-way) is designated as low-density residential. Most of these areas are located west, north, and south of the Torrance Airport and major industrial areas. The preservation of these areas would be encouraged by the City and enhanced through neighborhood revitalization efforts, supported by land use objective LU.5, housing objective H.4, land use policies LU.5.1 through policy LU.5.7, and housing policies H.4.1, H.4.2, and H.4.4."

A3-5



Principle 3: Enable prosperity for all people.

- GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2 *Support educational opportunities that promote balanced growth.*
- GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5 *Encourage civic engagement.*

SCAG Staff Comments:

Where sufficient information is provided in the Draft EIR, the proposed project meets consistency with Growth Visioning Principle 3.

With regard to GV P3.1, the proposed project meets consistency. Table 5.9-5 (Consistency with Compass Blueprint Regional Growth Principles), on page 5.9-26, mentions Housing Element objectives 1, 2, and 5 which support this principle.

The proposed project meets consistency with GV P3.2. Per Table 5.9-5 (Consistency with

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Compass Blueprint Regional Growth Principles), on page 5.9-27, Community Resources Element objectives 8 through 11 support this principle.

With regard to GV P3.3, SCAG staff is unable to determine whether the proposed project meets consistency, based on information provided in the Draft EIR.

The proposed project meets consistency with GV P3.4. Per Table 5.9-5 (Consistency with Compass Blueprint Regional Growth Principles), on page 5.9-30, Land Use Element objective 12 supports this principle.

With regard to GV P3.5, the proposed project meets consistency. Table 5.9-5 (Consistency with Compass Blueprint Regional Growth Principles), on page 5.9-30, Community Resources Element policies 9.2 and 13.6 support this principle.

A3-6
cont'd.

Principle 4: Promote sustainability for future generations.

GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*

GV P4.2 *Focus development in urban centers and existing cities.*

GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*

GV P4.4 *Utilize "green" development techniques*

SCAG Staff Comments:

The proposed project meets consistency with Growth Visioning Principle 4.

The proposed project meets consistency with GV P4.1. Per Table 5.9-5 (Consistency with Compass Blueprint Regional Growth Principles), on page 5.9-30, Community Resources Element objectives 1, 2, 3, 4, 5, and 8 support this principle.

As mentioned previously, under Growth Visioning Principle 2, the proposed project may be characterized as an infill development and therefore meets consistency with GV P4.2.

The proposed project meets consistency with GV P4.3. Per Table 5.9-5 (Consistency with Compass Blueprint Regional Growth Principles), on page 5.9-33, Community Resources Element objectives 13, 14, and 23 support this principle.

With regard to GV P4.4, the proposed project meets consistency. Per Table 5.9-5 (Consistency with Compass Blueprint Regional Growth Principles), on page 5.9-36, Community Resources Element objective 24 supports this principle.

A3-7

CONCLUSION

Overall, the proposed project generally meets consistency with SCAG Regional Transportation Plan Goals and Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here: http://www.scaq.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf

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When a project is of statewide, regional, or areawide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21018.7, and CEQA Guidelines Section 15097 (g).

A3-8
cont'd.



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A3. Response to Comments from Southern California Association of Governments, dated September 8, 2009.

- A3-1 This comment indicates that SCAG reviewed the DEIR and has determined that the proposed project is regionally significant.
- A3-2 This comment provides an overview of the project description. No response is necessary.
- A3-3 The General Plan Update EIR is a program level document that analyzes the impacts of the proposed General Plan Update through buildout of the City. The anticipated impacts of the project on population, households and employment for the City of Torrance over buildout are discussed in Section 5 of the DEIR. Additional comments are hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration. No additional comment is necessary.
- A3-4 Comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration. No additional comment is necessary.
- A3-5 Comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration. No additional comment is necessary.
- A3-6 Comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration. No additional comment is necessary.
- A3-7 Comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration. No additional comment is necessary.
- A3-8 Comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration. No additional comment is necessary.



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LETTER R1 – Leilani Kimmel-Dagostino(1 page)

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From: Cutting, Rebecca [RCutting@TorranceCA.gov]
Sent: Tuesday, August 11, 2009 9:54 AM
To: Jamie Thomas
Subject: FW: D-EIR for City's Proposed General Plan Update

More public comments on the D-EIR.....thanks!

Rebecca Cutting
 Planning Associate | Community Development Department
 City of Torrance | 3034 Torrance Blvd | Torrance CA 90503 | 310 619 6990 voice | 310 619 6929 fax | RCutting@TorranceCA.Gov | www.TorranceCA.Gov

From: LEILANIKD@aol.com [mailto:LEILANIKD@aol.com]
Sent: Sunday, August 09, 2009 9:05 AM
To: Cutting, Rebecca
Subject: D-EIR for City's Proposed General Plan Update

Hi Ms. Cutting:

I was at the Katy Geissert Library over the weekend reviewing the D-EIR for City's Proposed General Plan Update and I had a couple of questions about it.

How often is this Report done? The reason I ask is that it seems to me that there is an inverse relationship between population growth and development and the 3 proposals reflect this. Since there is a new census coming in 2010, wouldn't it be premature to make a decision without the most recent census count for Torrance? This D-EIR is based on data from the last census 10 years ago with a projection for growth based on linear projected growth figures of that data. With the current macroeconomic environment, people leaving California, and a lowered birth rate, I don't think the recommended Mixed-Use Development option is a viable option.

R1-1



I'm just trying to get some perspective on this and would appreciate your help.

Regards,
 Leilani A. Kimmel-Dagostino, MBA, RFC
 Torrance Commission on Aging - Chairman
 Torrance CERT - Disaster Service Worker
 Torrance Strategic Plan Committee - Transportation
 Torrance 2010 Census Complete Count Committee

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2. Response to Comments

R1. Response to Comments from Leilani Kimmel-Dagostino, dated August 9, 2009.

R1-1 Every city and county in California is required to adopt a general plan and update the plan at regular intervals. The purpose of the general plan is to anticipate and plan for “the physical development of the county or city, and any land outside its boundaries which bears relation to its planning” (California Government Code §65300). While there is no mandated time period in which the General Plan needs to be updated, most cities update their plans every 15-20 years, or after experiencing substantial growth or changes.

It is assumed that the commenter is referring to the alternatives analysis when discussing the “3 proposals”. CEQA Guidelines Section 15126.6 advises that a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant impacts of the project be described. A reasonable range of alternatives is discussed in Section 7 of the DEIR.

While 2010 is a Census year, the information received during the census will not be available until 2012. The population information and projections used in the General Plan and EIR come from the most up to date sources available at time of preparation.

Your comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration. No additional response is necessary.



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LETTER R2 – Thomas Rische (1 page)

Page 1 of 1

From: Cutting, Rebecca [RCutting@TorranceCA.gov]
Sent: Thursday, September 10, 2009 8:10 AM
To: Jamie Thomas
Subject: FW: Comments from Traffic Commissioner Rische on GP-DEIR

Jamie, here are some additional comments from one of the Traffic Commissioners. This will conclude the comments. Thanks. –Rebecca

Hi All,

Commissioner Rische may be sending his comments via email, but in case he does not, these were his comments from last night:

- Legend on Figure 3-3 (page 3-11) is illegible, please modify; | R2-1
- Color schemes hard to follow between Figures 3-3 and 3-4, can you modify or identify changes/differences; | R2-2
- Should there be a reference to the negotiations occurring between the City and Caltrans on the potential relinquishment of both PCH and Hawthorne boulevards. | R2-3

Thanks,
Ted

Ted Semaan
 Division Manager – Community Development Department
 City of Torrance | 3051 Torrance Blvd. | Torrance, CA 90503 | 310.618.5990 | 310.618.5829 fax |
TSemaan@TorranceCA.Gov | www.TorranceCA.Gov



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2. Response to Comments

R2. Response to Comments from Thomas Rische, dated September 10, 2009.

- R2-1 The graphic in question is taken from the current 1992 General Plan and is unable to be modified, however, your comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration.
- R2-2 The graphics in question are derived from the General Plan and are not related to the EIR, however, your comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration.
- R2-3 The discussions between the City and Caltrans regarding the potential relinquishment of Pacific Coast Highway and Hawthorne Boulevard do not relate to and are not affected by the proposed General Plan and are therefore not discussed in the EIR. However, your comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration.



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LETTER R3 – Jose Santome (3 pages)

August 3, 2009

Ted Semaan, Manager
City of Torrance
Transportation Planning
Development Engineering & Records Division

Dear Ted;

I have reviewed the compact disc sent by your office, which contains the "Draft Environmental Impact Report" (EIR) for the City of Torrance General Plan Update. I wish to have the below listed questions and comments entered into the record to the review of the draft EIR. Also, I intend to cover ask these questions and provide these comments during tonight's Traffic Commission meeting.

I realize that this letter is sent with short notice; however, I wanted to provide you with written questions prior to tonight's meeting to afford your staff time (though admittedly short) to research my questions and comments. Some of the comments or questions may not be clear, I will clarify and expand my comments and questions during the meeting tonight.

Please include this letter with the comments and questions as part of the meeting materials for tonight's agenda under Item 7(a.) to help avoid any redundancy in questions or comments from my fellow commissioners.

Sincerely,



JOSE SANTOME, Commissioner
City of Torrance Traffic Commission



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**COMMENTS and QUESTIONS about
“DRAFT ENVIRONMENTAL IMPACT REPORT”
for the City of Torrance General Plan Update**

PAGE 2-5	FINAL EIR CERTIFICATION <ul style="list-style-type: none"> • Do our oral questions count? If not, we should have been asked to write them down to conform to the process. • When is the final public hearing? 	R3-1
PAGE 5.15.3	MISSING DEFINITIONS <ul style="list-style-type: none"> • Define “HCM”, “ICU”, and “LOS” 	R3-2
PAGE 5.15-10	BICYCLE MASTER PLAN <ul style="list-style-type: none"> • Where is the BMP? • Traffic Commission has not seen/ discussed BMP. • How is, TMC ordinance 3871, bike ridership “encouraged” policy in action? 	R3-3
PAGE 5.15-11	TABLE 5.15-2 <ul style="list-style-type: none"> • LOS/HCM • F= 33 • E= 31/78/97 	R3-4
PAGE 5.15-14	PROPOSED GENERAL PLAN LAND USE <ul style="list-style-type: none"> • Why a different category for Hospital? • Isn't it a Business? Who made this determination? • What about government facilities? City/County/State owned & operated facilities in the City? 	R3-5
PAGE 5.15-15	Tables 5.15-4 & 5.15-3 <ul style="list-style-type: none"> • <i>Explanation from Staff</i> • <i>Tables are confusing, unclear</i> 	R3-6

2. Response to Comments

Page 3 of 3

**COMMENTS and QUESTIONS about
“DRAFT ENVIRONMENTAL IMPACT REPORT”
for the City of Torrance General Plan Update**

PAGE 5.15-16	TABLE 5.15-6 <ul style="list-style-type: none"> • Intersections 8/23/33/49/50 • Explain existing conditions & reasons 	R3-7
PAGE 5.15-21	TABLE 5.15-6 <ul style="list-style-type: none"> • Contains: “Intersection/ Required Improvements: • Add: “Cost of Improvement/ EIR of Improvements” 	R3-8
PAGE 5.15-23	IMPACT 5.15-3 PARKING <ul style="list-style-type: none"> • What about Government facilities? 	R3-9
	IMPACT 5.15-5 POLICY <ul style="list-style-type: none"> • What programs specifically? • Where is the visibility of policy (philosophy) in action? 	R3-10
PAGE 5.15-25	RELEVANT GENERAL PLAN UPDATE POLICIES/ CIRCULATION ELEMENT MULTI STORY PARKING POLICY (C1.5.3) <ul style="list-style-type: none"> • Residential & commercial projects should require multi story parking (even if subterranean) to alleviate parking shortage. PROMOTE THE USE OF ELECTRIC OR SIMILAR POWERED VEHICLES (Policy C1.8.9) <ul style="list-style-type: none"> • What about City owned/leased vehicles? • Where is the visibility of policy (philosophy) in action? 	R3-11



2. Response to Comments

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2. Response to Comments

R3. Response to Comments from Jose Santome, dated August 3, 2009.

- R3-1 Oral comments received at public hearings are taken into consideration, and written comments were requested during the 45-day public review period. The final public hearing for the proposed project is scheduled for November 10, 2009; however that is subject to change. The City has, and will continue to properly notice all hearings.
- R3-2 An explanation of HCM methodology is currently described on page 5.15-3, last paragraph. Per the commenter's request, page 5.15-3 as been amended as follows:

Methodology

The City of Torrance requires significant impacts to be determined based on the *HCM* analysis; the *ICU* analysis (which describes the operation of a signalized intersection using a range of LOS from LOS A (free-flow conditions) to LOS F (severely congested conditions)) is provided for informational purposes only, and is available in the appendix.

To determine whether the addition of project-generated trips at a study intersection results in a significant impact, the City of Torrance has established the following thresholds of significance:

- A significant project-related impact occurs at a study intersection if the addition of project-generated trips reduces the peak hour level of service of the study intersection to change from acceptable operation (LOS A, B, C, or D) to deficient operation (LOS E or F) based on the *HCM* methodology; or
- A significant impact occurs at a study intersection if the addition of project generated trips increases the delay at an intersection already operating at a deficient LOS (LOS E or F) based on the *HCM* methodology.

Level of service (LOS) is commonly used as a qualitative description of intersection operation and is based on the type of traffic control and delay experienced at the intersection.

- R3-3 The commenter is referring to the City's Bicycle Master Plan, which, though mentioned for informational purposes in the DEIR, is not related to the DEIR. However, your comments are hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration.
- R3-4 It is unclear what the commenter's statement or question is, however, your comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration.



2. Response to Comments

- R3-5 Although not related to the DEIR, your comments are hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration.
- R3-6 Tables 5.15-3 and 5.15-4 are presenting the calculations used to determine the trip generation of the proposed general plan update and the total trips generated, as described on page 5.15-15.
- R3-7 It is believed the commenter is referring to Table 5.15-5. It is unclear what the commenter's question or statement concerning the first bullet point is. Existing conditions refers to the conditions existing at the time the NOP is released, which in this case was November 12, 2008.
- R3-8 The required intersection improvements discussed in Table 5.15-6 must be completed within the General Plan horizon, which is the year 2030. It is anticipated that improvements identified in the Circulation Element will be implemented throughout the planning period as development occurs. The cost of improvements has not been calculated as part of the General Plan Update effort.
- R3-9 As stated in Impact 5.15-3, "The Torrance Municipal Code requires that parking be provided for all uses on a site. These regulations apply to all new developments and may be applied to existing uses that are modified or expanded."
- R3-10 Although not related to the DEIR, your comments are hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration.
- R3-11 Although not related to the DEIR, your comments are hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration.

2. Response to Comments

LETTER R4 – Dave Sargent (2 pages)

Page 1 of 2

From: Dave Sargent [mailto:dave.sargent@verizon.net]
Sent: Tuesday, August 04, 2009 11:58 AM
To: Semaan, Ted
Subject: My Comments on the Draft EIR

Ted,

Here are the comments I made last night, perhaps in a more organized order and some augmentation.

Page x: please add the following to the list of acronyms:

- DEIR = draft environmental report
- du/ac = dwelling units per acre
- ICU =

R4-1

Page 3-2: Table 3-1 shows footnote markings in the column headings yet there are no footnotes. Please supply same.

R4-2

Page 5.15-9: I didn't think of this last evening but the statements made on this page don't say much of value. In particular is there any way one or more of these services could be expanded to mitigate some of the LOS E and F intersections 5.15-5 to LOS D or better. In other words, is there a lower cost alternative to modifying intersections?

R4-3

(I realize this is probably the wrong document for this but it would be nice to know, particularly if the answer were, "No, augmenting public transport won't do the job.")

Page 5.15-20: I like the way the intersections are numbered (e.g., in Table 15-2 or Table 15-5) and suggest the numbers are carried over to the two lists of bullets on this page. It makes it much easier for a layman to follow the reasoning (which, by the way, I found to be quite sound.) Also, between the two sets of bullets I suggest adding to the existing sentence, "... because the LOS at the other three intersections either improve or remains virtually unchanged when the Project is implemented." (or words to that effect).

R4-4

Page 5.15-21: In Table 5.15-6 the wording under "Required Improvements" for the Crenshaw/PCH intersection is unclear. It can't possibly mean, "Preclude East-West traffic on PCH" and yet ... Please have them reword this.

R4-5

Page 5.15-22: For ease in understanding by the reader, I suggest adding a footnote to Table 5.15-7 for the Intersection 33 (Crenshaw/PCH) entry explaining that to raise the LOS from F to D or higher would take widening but that Caltrans controls this intersection.

R4-6

Page 5.15-26: The bullets under the "Impact 5.15-1" statement just repeat the content of Table 5.15-6. For brevity I suggest modifying the second sentence to read, "The improvements identified in Table 5.15-6 ... general plan." By leaving out the word "following" the five bullets can be deleted.

R4-7

Since the discussion of Intersections 8, 23, 33, 49 and 50 is so important, I suggest including the diagrams (found in Appendix J, Exhibits 16, 18, 21 and 22) showing existing Intersection/roadway

R4-8

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2. Response to Comments

Page 2 of 2

geometry for just those intersections directly after Table 5-15-6. Again, this suggestion is made to help the lay reader understand what's happening. | R4-8
cont'd.

Overall, I think the document (at least as far as I have reviewed it - Chapters 1-4, 5.15, 6-13 and Appendix J) does an admirable job of evaluating the environmental impact of the general plan update, stating the required mitigations and explaining the rationale for the analysis. | R4-9

Dave

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2. Response to Comments

R4. Response to Comments from Dave Sargent, dated August 4, 2009.

R4-1 Per the commenter's request, the following acronyms will be added to the *Abbreviations and Acronyms* section of Chapter 00:

DEIR Draft Environmental Impact Report

Du/ac Dwelling units per acre

ICU Intersection Capacity Utilization

R4-2 Per the commenter's request, Table 3-1 has been modified and all footnote references have been removed.

Table 3-1
Residential Buildout Estimates
Current General Plan

<i>Land Use Designation</i>	<i>Estimated Density (du/acre)</i>	<i>Acres</i>	<i>Dwelling Units</i>	<i>Persons per Household</i>	<i>Population</i>
Residential					
Low Density	6.8	3,998	27,189	2.63	69,506
Low Medium Density	13.5	426	5,751	2.63	14,702
Medium Density	21.00	591	12,401	2.63	31,700
Medium High/High Density	33.00	262	8,643	2.63	22,094
High Density	45.00	5	207	2.63	529
General Commercial			14		36
Commercial Center			272		695
Subtotal		5,252	54,476		139,262

Source: 1992 General Plan, 1996 General Plan Land Use Map and subsequent amendments as incorporated in GIS database/mapping developed by Dudek for the City (2005)



R4-3 The description of public transportation available to Torrance residents found on pages 5.15-9 and 10 is primarily for informational purposes. The expansion of these services is not proposed as part of the General Plan Update, and is therefore not analyzed in the Traffic Impact Analysis. However, your comments are hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration.

R4-4 Per the commenter's suggestion, Page 5.15-20 has been revised as follows:

The following eight study intersections are forecast to operate at a deficient LOS (LOS E or below) according to agency performance criteria for forecast existing plus proposed general plan update conditions during one or both peak hours, utilizing HCM methodology:

- 8. Anza Avenue/Sepulveda Boulevard (PM peak hour only)
- 23. Crenshaw Boulevard/190th Street (PM peak hour only)

2. Response to Comments

- 31. Crenshaw Boulevard/Lomita Boulevard (PM peak hour only)
- 33. Crenshaw Boulevard/Pacific Coast Highway (SR-1) (PM peak hour only)
- 49. Hawthorne Boulevard (SR-107)/Sepulveda Boulevard (PM peak hour only)
- 50. Hawthorne Boulevard (SR-107)/Lomita Boulevard (PM peak hour only)
- 83. Prairie Avenue/Redondo Beach Boulevard (PM peak hour only)
- 97. Western Avenue (SR-213)/Sepulveda Boulevard (PM peak hour only)

Based on agency-established thresholds of significance, the proposed general plan update is forecast to result in a significant impact at the following five study intersections utilizing HCM methodology because the LOS at the remaining intersections listed above would either improve or remain primarily unchanged with implementation of the proposed project:

- 8. Anza Avenue/Sepulveda Boulevard
- 23. Crenshaw Boulevard/190th Street
- 33. Crenshaw Boulevard/Pacific Coast Highway (SR-1)
- 49. Hawthorne Boulevard (SR-107)/Sepulveda Boulevard
- 50. Hawthorne Boulevard (SR-107)/Lomita Boulevard

- R4-5 Due to the commenter's observation, it was discovered that a word was unintentionally left out of the third required improvement in Table 5.15-6, which will be modified as follows:

Crenshaw Boulevard/Pacific Coast Highway (SR-1)

Modify the northbound Crenshaw Boulevard traffic signal phasing to include a northbound right-turn overlap, which will preclude U-turn movement from westbound to eastbound Pacific Coast Highway (SR-1).

2. Response to Comments

R4-6 Per the commenter's suggestion, Table 5.15-7 was modified as follows:

Table 5.15-7
Mitigated Forecast Existing Plus Proposed General Plan Update Conditions
AM & PM Peak Hour Intersection LOS

Study Intersection	Existing Without Project Conditions				Mitigated Forecast Existing Plus Proposed General Plan Update Conditions				Significant Impact
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		
	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	
8. Anza Avenue/Sepulveda Blvd (Area 6)	48.7	D	54.8	D	45.3	D	53.6	D	No
23. Crenshaw Blvd/190 th St (Area 4)	39.7	D	49.4	D	37.3	D	44.7	D	No
33. Crenshaw Blvd/Pacific Coast Hwy (SR-1) (Area 10)	52.0	D	104.3	F	40.3	D	92.4	F	No
49. Hawthorne Blvd (SR-107)/Sepulveda Blvd (Area 6)	39.4	D	50.4	D	38.6	D	41.5	D	No
50. Hawthorne Blvd (SR-107)/Lomita Blvd (Area 9)	40.1	D	48.5	D	39.1	D	41.9	D	No

Notes:

1. Delay shown in seconds per vehicle; deficient intersection operation shown in **bold italics**; significant impact shown in **bold**.
2. Pacific Coast Highway is a Caltrans facility, and not under the jurisdiction of the City of Torrance.

- R4-7 Your comment is hereby noted, however, CEQA requires that all information must be included in the mitigation measure including timing, responsibility, and required actions. As a result, the requested changes have not been made.
- R4-8 The City believes the figure provided in the appendix is adequate to relay the information to the lay reader. However, your comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration. No additional response is necessary.
- R4-9 Comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Torrance decision-makers for their review and consideration. No additional response is necessary.



2. Response to Comments

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3. Revisions to the Draft EIR

3.1 INTRODUCTION

This section contains revisions to the DEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DEIR publication; and/or (3) typographical errors. This section also includes additional mitigation measures to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements included in the DEIR. The provision of these additional mitigation measures does not alter any impact significance conclusions as disclosed in the DEIR. Changes made to the DEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

3.2 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the DEIR.

Pages xi-xiii, Abbreviations and Acronyms, has been updated in response to Comment R4-1, from Dave Sargent.

DEIR Draft Environmental Impact Report

Du/ac Dwelling units per acre

ICU Intersection Capacity Utilization

Table 3-1, Page 3-2, Section 3, Project Description, has been updated in response to Comment R4-2, from Dave Sargent.

**Table 3-1
Residential Buildout Estimates
Current General Plan**

<i>Land Use Designation</i>	<i>Estimated Density (du/acre)</i>	<i>Acres</i>	<i>Dwelling Units</i>	<i>Persons per Household</i>	<i>Population</i>
Residential					
Low Density	6.8	3,998	27,189	2.63	69,506
Low Medium Density	13.5	426	5,751	2.63	14,702
Medium Density	21.00	591	12,401	2.63	31,700
Medium High/High Density	33.00	262	8,643	2.63	22,094
High Density	45.00	5	207	2.63	529
General Commercial			14		36
Commercial Center			272		695
Subtotal		5,252	54,476		139,262

Source: 1992 General Plan, 1996 General Plan Land Use Map and subsequent amendments as incorporated in GIS database/mapping developed by Dudek for the City (2005)



3. Revisions to the Draft EIR

Page 5.15-3, Section 5.15, Transportation and Traffic, has been updated in response to Comment R3-2, from Jose Santome.

Methodology

The City of Torrance requires significant impacts to be determined based on the *HCM* analysis; the *ICU* analysis (which describes the operation of a signalized intersection using a range of LOS from LOS A (free-flow conditions) to LOS F (severely congested conditions)) is provided for informational purposes only, and is available in the appendix.

To determine whether the addition of project-generated trips at a study intersection results in a significant impact, the City of Torrance has established the following thresholds of significance:

- A significant project-related impact occurs at a study intersection if the addition of project-generated trips reduces the peak hour level of service of the study intersection to change from acceptable operation (LOS A, B, C, or D) to deficient operation (LOS E or F) based on the *HCM* methodology; or
- A significant impact occurs at a study intersection if the addition of project generated trips increases the delay at an intersection already operating at a deficient LOS (LOS E or F) based on the *HCM* methodology.

Level of service (LOS) is commonly used as a qualitative description of intersection operation and is based on the type of traffic control and delay experienced at the intersection.

Page 5.15-20, Section 5.15, Transportation and Traffic, has been updated in response to Comment R4-4, from Dave Sargent.

The following eight study intersections are forecast to operate at a deficient LOS (LOS E or below) according to agency performance criteria for forecast existing plus proposed general plan update conditions during one or both peak hours, utilizing HCM methodology:

- 8. Anza Avenue/Sepulveda Boulevard (PM peak hour only)
- 23. Crenshaw Boulevard/190th Street (PM peak hour only)
- 31. Crenshaw Boulevard/Lomita Boulevard (PM peak hour only)
- 33. Crenshaw Boulevard/Pacific Coast Highway (SR-1) (PM peak hour only)
- 49. Hawthorne Boulevard (SR-107)/Sepulveda Boulevard (PM peak hour only)
- 50. Hawthorne Boulevard (SR-107)/Lomita Boulevard (PM peak hour only)
- 83. Prairie Avenue/Redondo Beach Boulevard (PM peak hour only)
- 97. Western Avenue (SR-213)/Sepulveda Boulevard (PM peak hour only)

Based on agency-established thresholds of significance, the proposed general plan update is forecast to result in a significant impact at the following five study intersections utilizing HCM methodology because the LOS at the remaining intersections listed above would either improve or remain primarily unchanged with implementation of the proposed project:

- 8. Anza Avenue/Sepulveda Boulevard

3. Revisions to the Draft EIR

- 23. Crenshaw Boulevard/190th Street
- 33. Crenshaw Boulevard/Pacific Coast Highway (SR-1)
- 49. Hawthorne Boulevard (SR-107)/Sepulveda Boulevard
- 50. Hawthorne Boulevard (SR-107)/Lomita Boulevard

Page 5.15-21, Table 5.15-6, Section 5.15, Transportation and Traffic, has been updated in response to Comment R4-5, from Dave Sargent.

**Table 5.15-6
Required Intersection Improvements**

<i>Intersection</i>	<i>Required Improvements</i>
Anza Avenue/Sepulveda Boulevard	Widen eastbound Sepulveda Boulevard approach from one left-turn lane, one through lane and one shared through/right-turn lane to consist of one left-turn lane, two through lanes, and one right-turn lane.
Crenshaw Boulevard/190 th Street	Widen the westbound Crenshaw Boulevard approach from two left-turn lanes, two through lanes, and one right-turn lane to consist of two left-turn lanes, three through lanes, and one right-turn lane.
Crenshaw Boulevard/Pacific Coast Highway (SR-1)	Modify the northbound Crenshaw Boulevard traffic signal phasing to include a northbound right-turn overlap, which will preclude U-turn movement from westbound to eastbound Pacific Coast Highway (SR-1).
Hawthorne Boulevard (SR-107)/Sepulveda Boulevard	Modify the northbound Hawthorne Boulevard (SR-107) traffic signal phasing to include a northbound right-turn overlap, which will preclude U-turn movement from westbound to eastbound Sepulveda Boulevard.
Hawthorne Boulevard (SR-107)/Lomita Boulevard	Modify the westbound Lomita Boulevard traffic signal phasing to include a westbound right-turn overlap, which will preclude U-turn movement from southbound to northbound Hawthorne Boulevard (SR-107)



3. Revisions to the Draft EIR

Page 5.15-22, Table 5.15-7, Section 5.15, Transportation and Traffic, has been updated in response to Comment R4-6, from Dave Sargent.

**Table 5.15-7
Mitigated Forecast Existing Plus Proposed General Plan Update Conditions
AM & PM Peak Hour Intersection LOS**

Study Intersection	Existing Without Project Conditions				Mitigated Forecast Existing Plus Proposed General Plan Update Conditions				Significant Impact
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		
	Delay - LOS		Delay - LOS		Delay - LOS		Delay - LOS		
8. Anza Avenue/Sepulveda Blvd (Area 6)	48.7	D	54.8	D	45.3	D	53.6	D	No
23. Crenshaw Blvd/190 th St (Area 4)	39.7	D	49.4	D	37.3	D	44.7	D	No
33. Crenshaw Blvd/Pacific Coast Hwy (SR-1) (Area 10)	52.0	D	104.3	F	40.3	D	92.4	F	No
49. Hawthorne Blvd (SR-107)/Sepulveda Blvd (Area 6)	39.4	D	50.4	D	38.6	D	41.5	D	No
50. Hawthorne Blvd (SR-107)/Lomita Blvd (Area 9)	40.1	D	48.5	D	39.1	D	41.9	D	No

Notes:

1. Delay shown in seconds per vehicle; deficient intersection operation shown in **bold italics**; significant impact shown in **bold**.
2. Pacific Coast Highway is a Caltrans facility, and not under the jurisdiction of the City of Torrance.

Page 5.16-11, Section 5.16, Utilities and Service Systems, has been updated in response to Comment A2-1, from the Los Angeles County Sanitation District.

...Wastewater generated in the City is transported to the JWPCP in Carson, which has current wastewater flows of about ~~320~~ 288.2 MGD (~~322,825~~), a maximum design flow of ~~385~~ 400 mgd (~~431,255~~ 448,056 afy), and a maximum design peak flow of 540 mgd (604,878 afy). The design capacity of the JWPCP is thus about ~~65~~ 111.8 mgd greater than the facility's current wastewater flows....

Figure 5.8-3, Flood Hazards, Section 5.8, Hydrology and Water Quality, has been updated since the release of the DEIR, and is shown in Appendix A of this document.

Figures 5.15-1 Roadway Classification Map ,5.15-2 Torrance Transit System, 5.15-3 Bikeway Master Plan, and 5.15-4 Truck and Rail Routes, Section 5.15, Transportation and Traffic, have been updated since the release of the DEIR, and are shown in Appendix A of this document.

Appendix A. Updated Figures

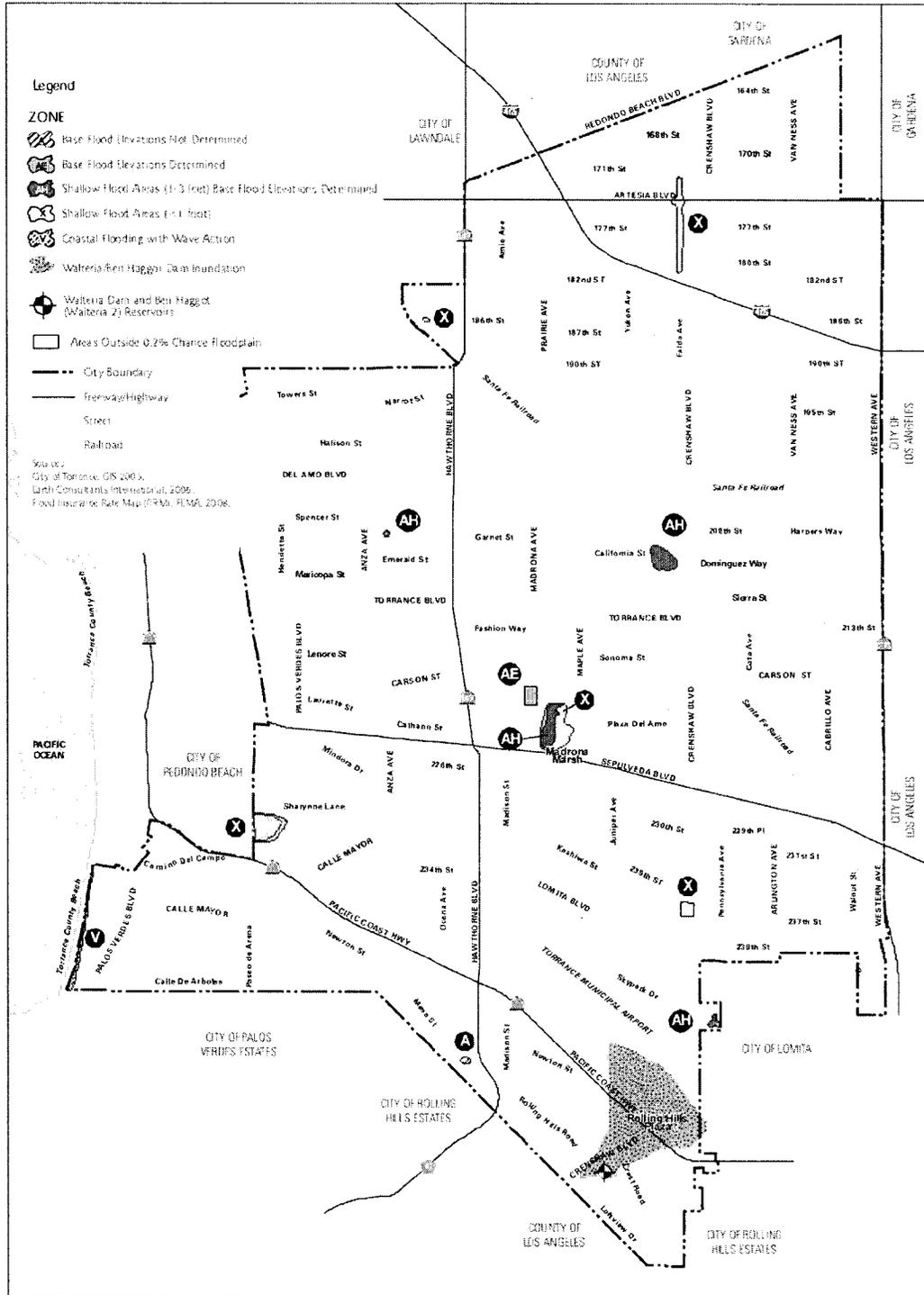


Appendices

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5. Environmental Analysis

Flood Hazards



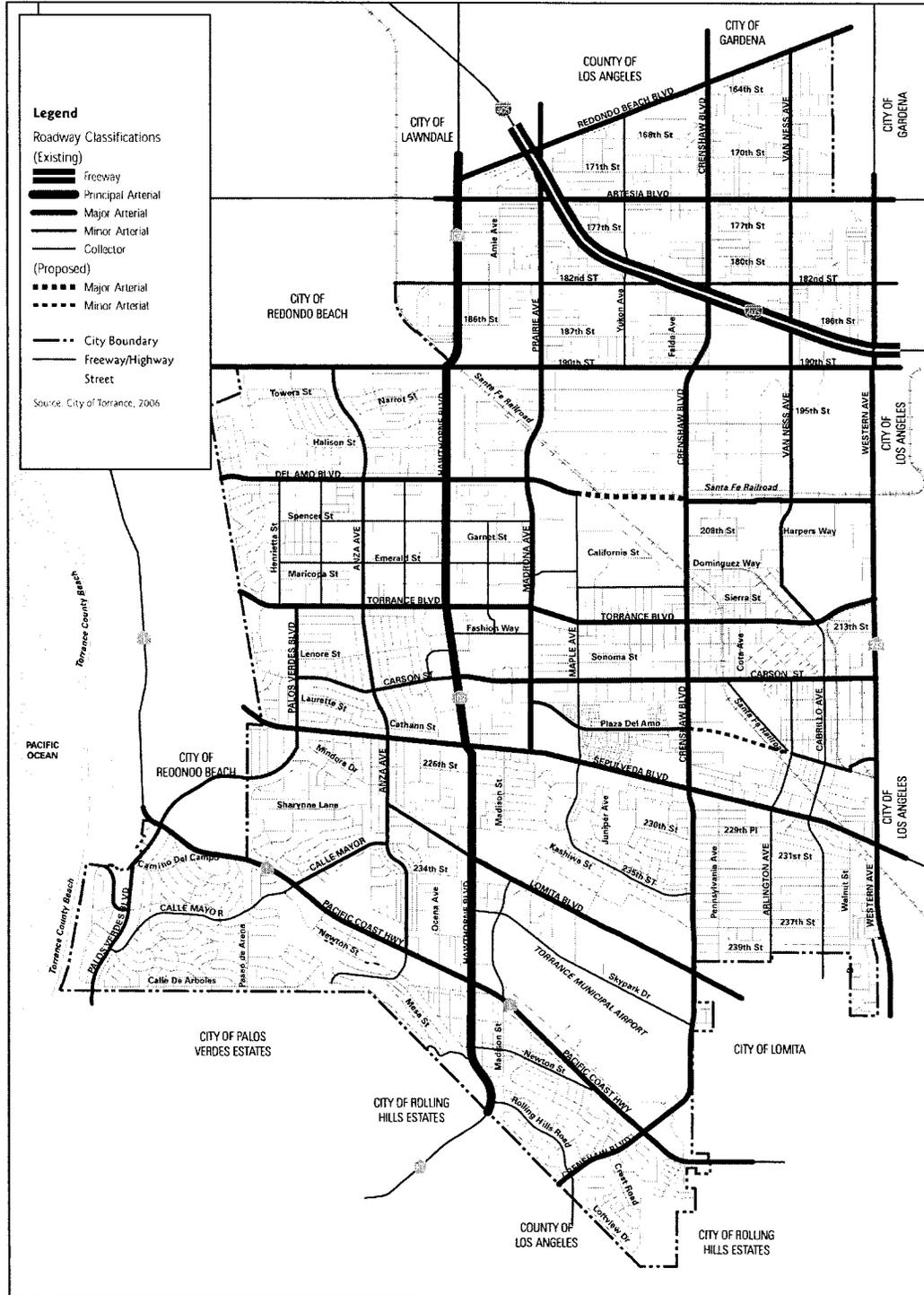
Source: ECI 2005

City of Torrance General Plan Update Draft EIR

The Planning Center • Figure 5.8-3

5. Environmental Analysis

Roadway Classification Map

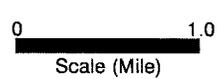
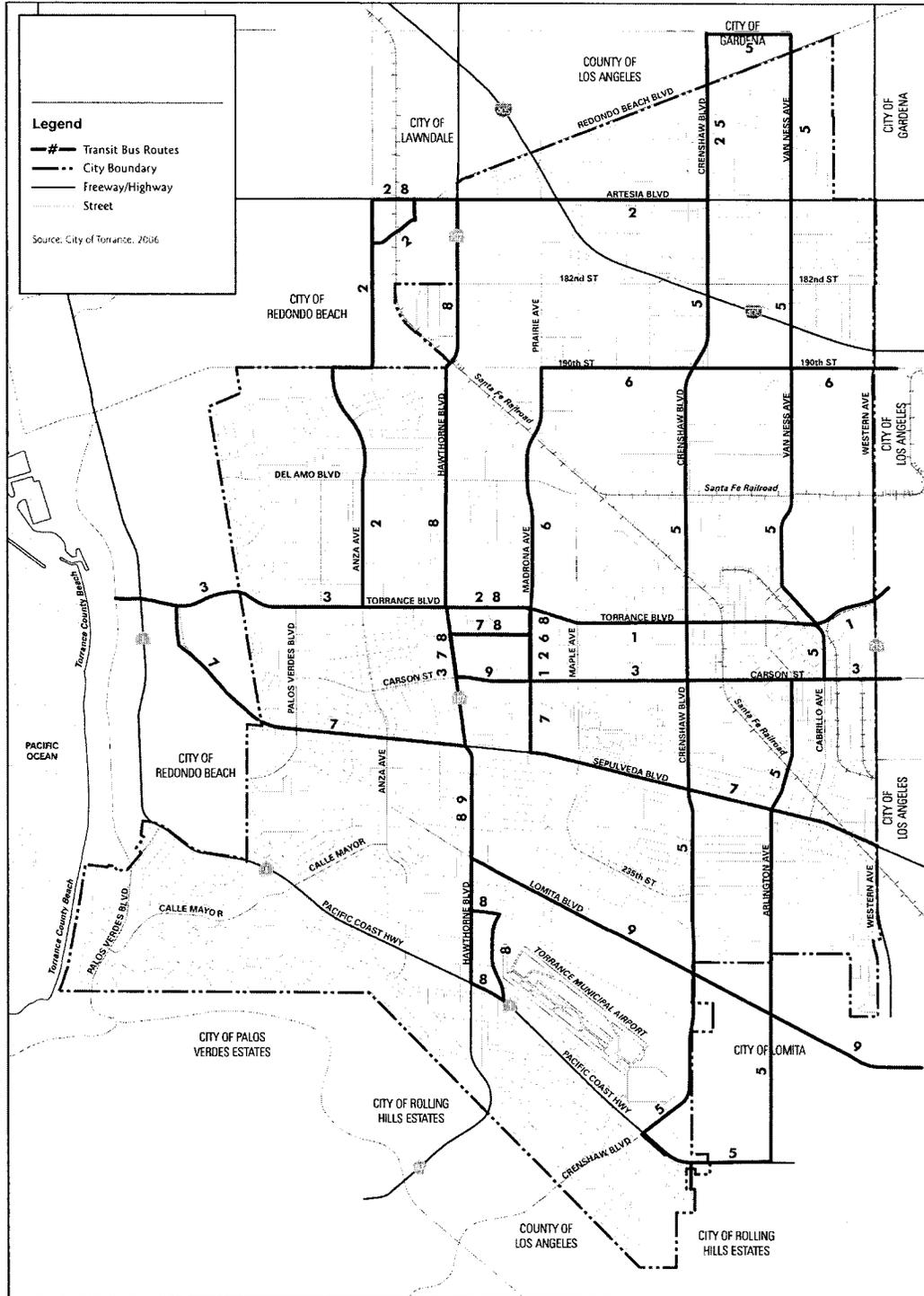


Source: Torrance General Plan 2005

City of Torrance General Plan Update Draft EIR

The Planning Center • Figure 5.15-1

5. Environmental Analysis Torrance Transit System



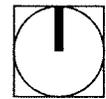
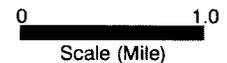
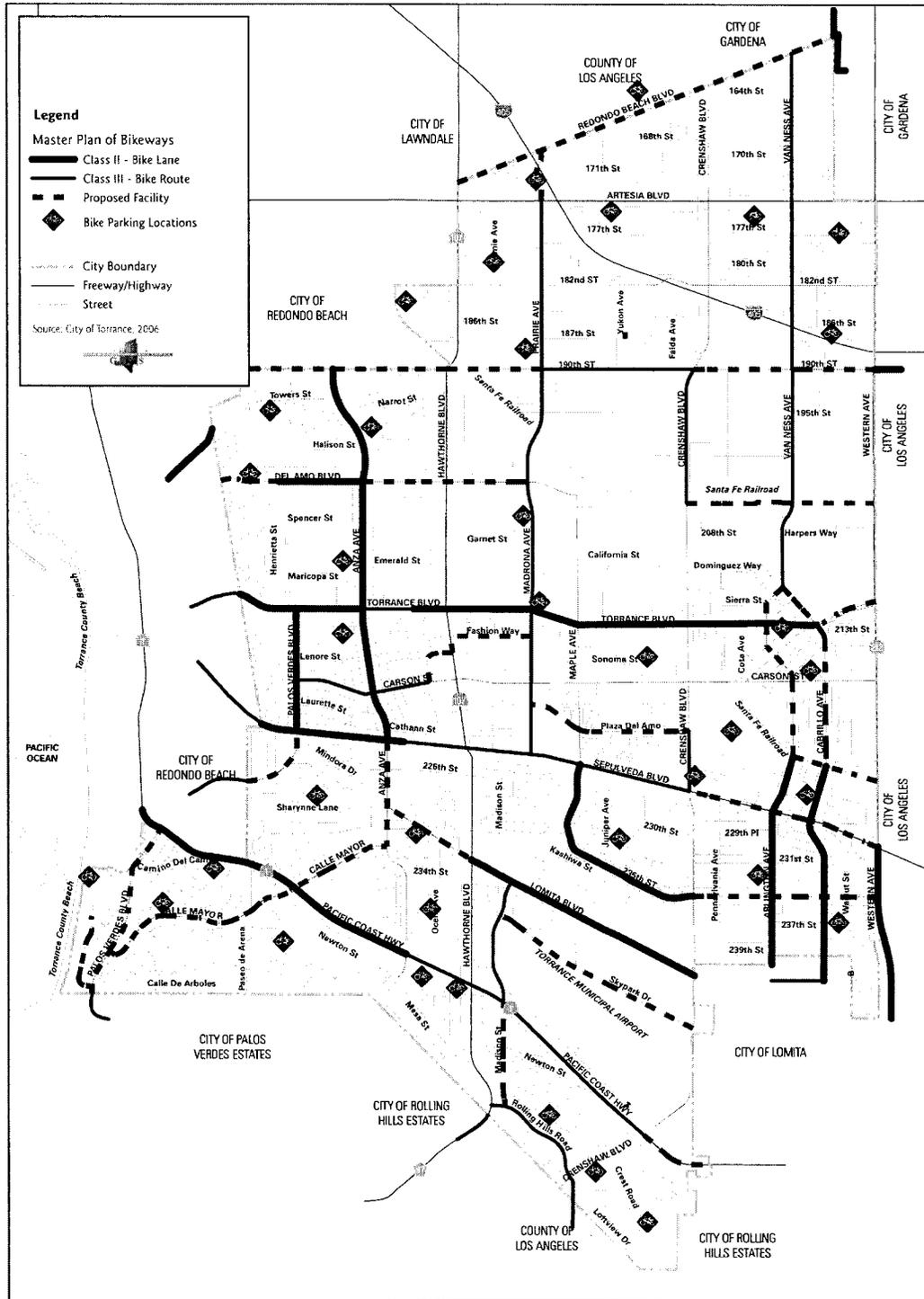
Source: Torrance General Plan 2005

City of Torrance General Plan Update Draft EIR

The Planning Center • Figure 5.15-2

5. Environmental Analysis

Bikeway Master Plan



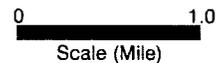
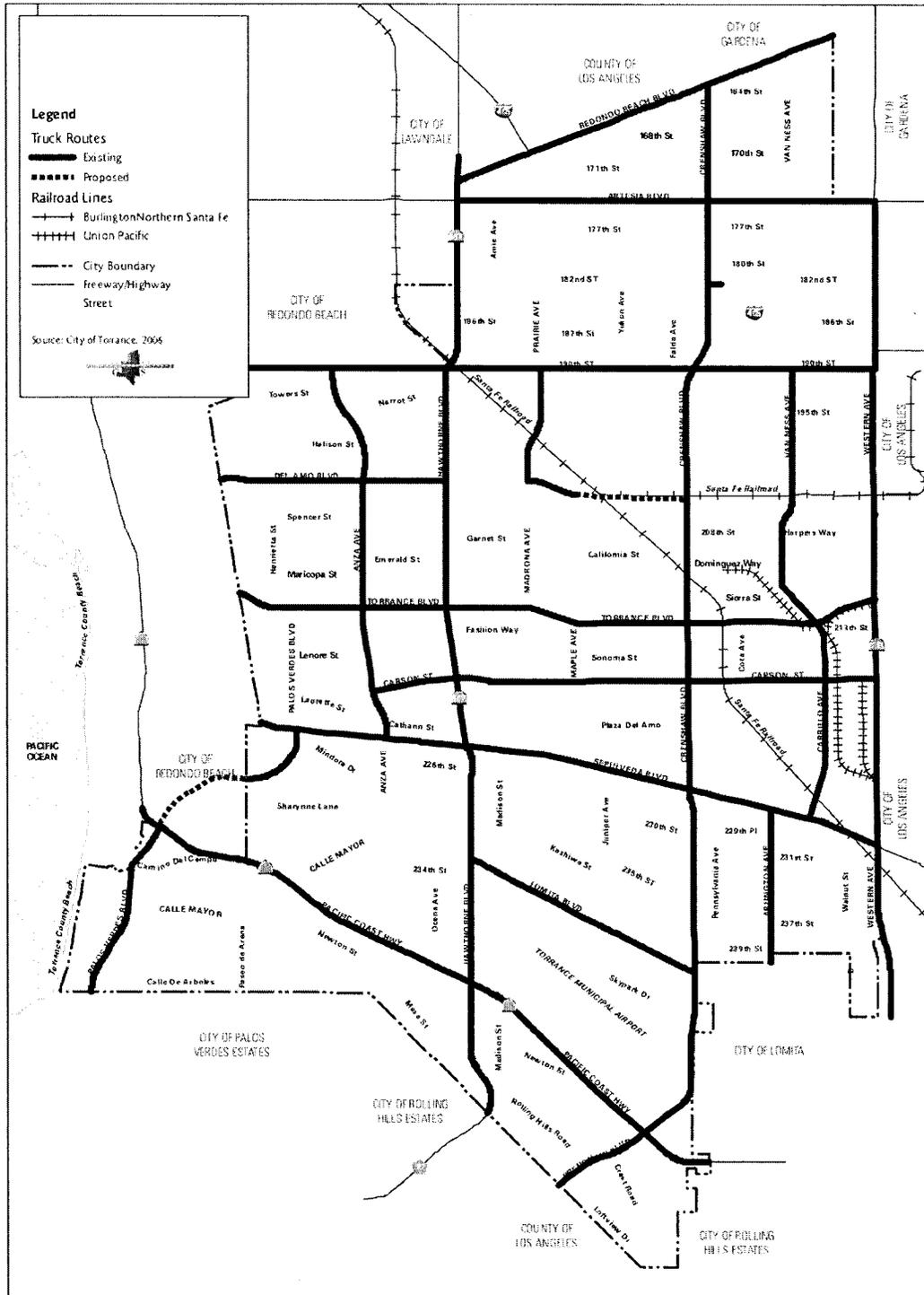
Source: Torrance General Plan 2005

City of Torrance General Plan Update Draft EIR

The Planning Center • Figure 5.15-3

5. Environmental Analysis

Truck and Rail Routes



Source: Torrance General Plan 2005

**MITIGATION
MONITORING
PROGRAM
FOR:**

CITY OF TORRANCE

GENERAL PLAN

UPDATE EIR



prepared for:

CITY OF TORRANCE

Contact:
Ted Semaan
General Plan and
Redevelopment Manager

prepared by:

**THE PLANNING
CENTER**

Contact:
William Halligan, Esq.
Vice President,
Environmental Services

OCTOBER 2009

**CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS
REGARDING THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
CITY OF TORRANCE
GENERAL PLAN UPDATE
STATE CLEARINGHOUSE NO. 2008111046**

Exhibit A

I. INTRODUCTION

The California Environmental Quality Act (CEQA) requires that written findings be made by the Lead Agency (City of Torrance) as part of the certification of the environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA and the specific reasons for considering the project acceptable even though the project has significant impacts that are infeasible to mitigate.

The Lead Agency is responsible for the adequacy and objectivity of the EIR. The City of Torrance, as Lead Agency, has subjected the Draft EIR (DEIR) and Final EIR (FEIR) to the agency's own review and analysis. The DEIR, FEIR, and the Findings of Fact reflect the independent judgment of the City of Torrance.

A. FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

The City of Torrance, as Lead Agency, is required under CEQA to make written findings concerning each alternative and each significant environmental impact identified in the DEIR and FEIR.

Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been completed which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 1. Changes or alterations have been required in, or incorporated into, the project which mitigates or avoids the significant environmental effects on the environment.
 2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can or should be, adopted by that other agency.
 3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
- (c) The finding in subsection (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives.
- (d) When making the findings required in subsection (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.

The "changes or alterations" referred to in Section 15091(a)(1) above, which are required in or incorporated into the project and which mitigate or avoid the significant environmental effects of the project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

Regarding a Statement of Overriding Considerations, Guidelines Section 15093 provides:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record.

The statement of overriding considerations shall be supported by substantial evidence in the record.

- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

B. ENVIRONMENTAL REVIEW PROCESS

In conformance with CEQA and the State CEQA Guidelines, the City of Torrance conducted an extensive environmental review of the proposed project. The environmental review process has included:

- Completion of an Initial Study (IS) by the City of Torrance, which concluded that an EIR should be prepared and the Notice of Preparation (NOP), were released for a 30-day public review period from Wednesday, November 12, 2008, through Thursday, December 11, 2008. The NOP was posted at the Los Angeles County Clerk Recorder's office on November 12, 2008. Copies of the IS were made available for public review at the City of Torrance Community Development Department and the City of Torrance Public Library, and it was available for download via the City of Torrance Community Development Web site.
- Completion of a scoping process, in which the public was invited by the City to participate. The scoping meeting for the EIR was held on Wednesday, November 12, 2008, at the City of Torrance Council Chambers. The notice of a public scoping meeting was included in the NOP for the City.
- Preparation of a DEIR by the City, which was made available for a 30-day public review period (Thursday, July 23, 2009, through Tuesday, September 8, 2009). The DEIR consisted of two volumes. Volume I contains the text of the DEIR and analysis of the City of Torrance General Plan Update. Volume II contains the appendices, including the NOP and responses to the NOP. The Notice of Availability (NOA) for the DEIR was sent to interested persons and organizations, sent to the State Clearinghouse in Sacramento for distribution to public agencies, posted at the City of Torrance City Hall and on the City's web site. The NOA was posted at the Los Angeles County Clerk Recorder's office on July 27, 2009. Copies of the DEIR were made available for public review at the City of Torrance Community Development Department and the City of Torrance Public Library. Volumes I and II of the DEIR were also available for download via the City of Torrance Community Development Department Web site.
- Preparation of an FEIR, including the Comments and Responses to Comments on the DEIR. The FEIR/Response to Comments contains: comments on the DEIR, responses to those comments, revisions to the DEIR, and appended documents. The FEIR Response to Comments was released for a 10-day agency review period prior to certification of the FEIR.
- Public hearings were held for the proposed project, including a Planning Commission hearing and a City Council Hearing.

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- NOP and all other public notices issued by the City in conjunction with the proposed project

- The FEIR (includes DEIR) for the proposed project
- All written comments submitted by agencies or members of the public during the public review comment period on the DEIR
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the DEIR
- The Mitigation Monitoring Program (MMP)
- The reports and technical memoranda included or referenced in the Response to Comments of the FEIR
- All documents, studies, EIRs, or other materials incorporated by reference in the DEIR and FEIR
- The Ordinances and Resolutions adopted by the City in connection with the proposed Project, and all documents incorporated by reference therein
- Matters of common knowledge to the City, including but not limited to federal, state, and local laws and regulations
- Any documents expressly cited in these Findings
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

The documents and other material that constitute the Record of Proceedings on which these findings are based are located at the City of Torrance, 3031 Torrance Boulevard, Torrance, CA 90503. The custodian for these documents is the City of Torrance. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) 14 California Code Regulations Section 15091(e).

C. PROJECT SUMMARY

The proposed project is the preparation of the City of Torrance General Plan Update, which consists of an update of the Torrance General Plan Elements and Land Use map. The City of Torrance General Plan Update provides guidance that shapes the community for the next 15 to 20 years. The General Plan includes the elements required by the state (circulation, conservation, housing, land use, noise, open space, and safety elements). The conservation and open space elements have been combined into one community resources element.

Pursuant to CEQA Guidelines Section 15064(d), the EIR considers the direct physical changes and reasonably foreseeable indirect physical changes in the environment that would be caused by the City of Torrance General Plan Update. Consequently, the EIR focuses on impacts from changes to land use associated with buildout of the Proposed Land Use Plan and impacts from the resultant population and employment growth in the City. The City of Torrance General Plan Update Proposed Land Use Plan for the ultimate development of the City is not linked to a timeline. However, for the purpose of this environmental analysis, buildout of the Proposed Land Use Plan is forecast for the year 2035.

D. PROJECT LOCATION

The City of Torrance is in southwestern Los Angeles County, in the highly urbanized South Bay region. The South Bay consists of the cities and communities of Compton, Gardena, Carson, Redondo Beach, Palos Verdes Estates, Lomita, Rolling Hills Estates, Rancho Palos Verdes, San Pedro, Wilmington, Harbor City, portions of Long Beach, and Torrance.

Communities directly adjacent to Torrance include Rolling Hills Estates and Palos Verdes Estates to the south, Redondo Beach to the west, Gardena and Lawndale to the north, and Carson to the east. The Pacific Ocean forms a small portion of the western border of the City. Interstate 405 (I-405) transects the northern portion of the City and provides regional access, along with I-110.

E. PROJECT OBJECTIVES

The following objectives have been established for the City of Torrance General Plan Update:

- To provide a comprehensive update to the City's General Plan that establishes the goals and policies that create a built environment that fosters the enjoyment, financial stability and well being of the entire community.
- To designate the distribution, location, balance and extent of land uses including residential, commercial, industrial and open space.
- To ensure that future development will occur consistent with the high standards that the City has set and that make Torrance a desirable place to live.
- To preserve the City's valuable industrial core and jobs base.
- To accommodate a diverse range of commercial uses at locations throughout Torrance to meet the local shopping and service needs of residents, and to create opportunities for revenue generation at regional centers.
- To encourage the revitalization and conversion of older, under-performing, blighted commercial and industrial areas.
- To support, on a limited basis, mixed-use development approached where such development is compatible with surrounding uses.
- To ensure that future growth will be respectful towards the City's cultural resources and architectural heritage, and to encourage preservation of Old Torrance's distinct character and unique characteristics, including the street layout and structures.
- To encourage alternative modes of transportation, such as walking, bicycling and transit.
- To seek ways to enhance the level of service of the citywide roadway system while minimizing traffic intrusion into residential neighborhoods.
- To continue to maintain a high level of public services to the community by protecting and enhancing public resources such as schools, libraries, the airport, hospitals, parks and open space, and community centers.

F. SUMMARY OF ENVIRONMENTAL IMPACTS

In compliance with CEQA, the City evaluated the project's potential for significant environmental effects, determined that an EIR should be prepared for the project, and completed a multistep process to determine the appropriate scope of issues to be examined in the EIR. An IS was prepared using an Environmental Checklist form to provide the City with information to use as a basis for deciding whether to prepare an EIR or Negative Declaration, to assist in the preparation of the EIR, and to facilitate environmental assessment early in the design of the project. In addition, the City solicited input from agencies through the distribution of an NOP. The NOP process is used to help determine the scope of the environmental issues to be addressed in the DEIR. Based on this process and the IS for the project, certain environmental categories were identified as having the potential to result in significant impacts. Issues considered significant or potentially significant were addressed in the DEIR. Issues identified as less than significant or having no impact were not addressed beyond the discussion in the IS. Issues addressed in the DEIR are listed below. The purpose of the public review period was to solicit comments on the scope and content of the environmental analysis to be included in the DEIR.

The IS/NOP and copies of scoping comment letters are incorporated in the DEIR. Based on the results of the IS circulated on November 12, 2008, a number of environmental issues were identified as requiring a detailed review in the DEIR. The DEIR was circulated on July 23, 2009. The following is a summary of the impacts considered less than significant, less than significant with mitigation, and significant and unavoidable in the DEIR:

Less Than Significant

- Aesthetics
- Air Quality (traffic-generated pollution; objectionable odors)
- Biological Resources
- Cultural Resources (disturbing human remains)
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise (noise-sensitive land uses within the Torrance Airport 60 DBA Noise Contour)
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic (air traffic patterns, hazards and circulation design, parking, alternative transportation)
- Utilities and Service Systems

Less Than Significant With Mitigation Incorporated

- Cultural Resources (prehistoric, paleontologic)
- Greenhouse Gas Emissions (contribution of greenhouse gas emissions to atmosphere)
- Noise (groundborne vibrations pertaining to sensitive land uses)
- Transportation (level of service for the existing area roadway system)

Significant and Unavoidable

- Air Quality (construction emissions; long-term operation conflicts with South Coast Air Quality Management District (SCAQMD) plans and thresholds; sensitive land uses)
- Noise (noise from transportation sources; groundborne vibration; increase in existing noise levels)

G. DOCUMENT FORMAT

This document summarizes the significant environmental impacts of the project, describes how these impacts are to be mitigated, and discusses various alternatives to the proposed project, which were developed in an effort to reduce the remaining significant environmental impacts. All impacts are considered potentially significant prior to mitigation unless otherwise stated in the findings.

This document is divided into five sections:

Section 1. *Introduction and Summary* provides the CEQA requirements for the Findings of Fact and Statement of Overriding Considerations, the environmental review process undertaken to date, a brief description of the proposed project and the environmental setting, the list of project objectives, summary of significant environmental impacts evaluated in the DEIR/FEIR, and a description of the contents of this document.

Section 2. *Findings on Potentially Significant Impacts* presents significant impacts of the proposed project that were identified in the FEIR, the mitigation measures identified in the MMP, the findings for significant impacts, and the rationales for the findings.

Section 3. *Findings on the Project Alternatives* presents alternatives to the project and evaluates them in relation to the findings set forth in Section 15091(a)(3) of the State CEQA Guidelines, which allows a public agency to approve a project that would result in one or more significant environmental effects if the project alternatives are found to be infeasible because of the specific economic, social, or other considerations.

Section 4. *Statement of Overriding Considerations* presents the overriding considerations for significant impacts related to the project that cannot be or have not been mitigated or resolved. These considerations are required under Section 15093 of the State CEQA Guidelines, which require decision makers to balance the benefits of a proposed project against its unavoidable environmental risk in determining whether to approve the project.

Section 5. *References* includes the references used for the preparation of the DEIR.

II. FINDINGS ON POTENTIALLY SIGNIFICANT IMPACTS

This section discusses significant impacts of the proposed project that were identified in the FEIR, the mitigation measures identified in the MMP, the findings for significant impacts, and the rationales for the findings.

A. AIR QUALITY

Impact 5.2-1 Buildout of the City of Torrance in accordance with the Proposed Land Use Plan would potentially conflict with the South Coast Air Quality Management District's Air Quality Management Plan.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-10 of the DEIR. SCAQMD and the Southern California Association of Governments (SCAG) are the agencies responsible for preparing the air quality management plan (AQMP) for the South Coast Air Basin (SoCAB). The project site is in the SoCAB, which includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino Counties. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_x), sulfur dioxide (SO₂), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), and lead (Pb) are primary air pollutants. The most recent adopted comprehensive plan is the 2007 AQMP, adopted on June 1, 2007, which incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. The 2007 AQMP proposes attainment demonstration of the federal PM_{2.5} standards through a more focused control of SO_x, directly emitted PM_{2.5}, and focused control of NO_x and VOC by 2015. The eight-hour ozone control strategy builds upon the PM_{2.5} strategy, augmented with additional NO_x and VOC reductions to meet the standard by 2024, assuming an extended attainment date is obtained. There are two key indicators of consistency:

Indicator 1: Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards (AAQS) or interim emission reductions in the AQMP.

Because the project involves long-term growth associated with buildout of the City of Torrance, cumulative emissions generated by construction and operation of individual projects would exceed the SCAQMD regional and localized thresholds (see Impact 5.2-2 and Impact 5.2-3). Consequently, emissions generated by development projects in addition to existing sources within the City are considered to cumulatively contribute to the nonattainment designations of the SoCAB. Buildout of the proposed Land Use Plan would, therefore, contribute to an increase in frequency or severity of air quality violations and delay attainment of the AAQS or interim emission reductions in the AQMP; and emissions generated from buildout of the proposed land use plan would result in a significant air quality impact. The project would not be consistent with the AQMP under the first indicator.

Indicator 2: Whether the project would exceed the assumptions in the AQMP. The AQMP strategy is, in part, based on projections from local general plans.

The land use designations of the General Plan are a basis for the emissions inventory for the SoCAB in the AQMP. The AQMP is based on projections in population, employment, and vehicle miles traveled (VMT) in the SoCAB region projected by SCAG. SCAG projections for the City are based on the current General Plan. Trip generation and VMT under the proposed land use plan would be greater. The growth projections that are based on SCAG's Regional Transportation Plan (RTP) and the associated emissions inventory in SCAQMD's AQMP do not include the additional growth forecast of the proposed General Plan Update. Consequently, the 2007 AQMP does not consider emissions associated with the proposed Land Use Plan. Once the proposed General Plan Update is adopted and the AQMP is revised, SCAG and SCAQMD will incorporate the growth projections associated with buildout of the proposed Land Use Plan in their regional planning projections; and the proposed General Plan Update would be consistent with the AQMP. However, since full buildout associated with the proposed General Plan Update is not currently included in the emissions inventory for the SoCAB, impacts associated with the second indicator are also considered significant.

Mitigation Measure:

Consistency with the AQMP: Goals and policies are included in the Torrance General Plan Update that would facilitate continued City cooperation with SCAQMD and SCAG to achieve regional air quality improvement goals, promotion of energy conservation design and development techniques, encouragement of alternative transportation modes, and implementation of transportation demand management strategies. However, no mitigation measures are available that would eliminate or reduce impacts associated with consistency with the AQMP.

Finding: There are no mitigation measures that would be able to reduce the impacts of the Torrance General Plan Update to less than significant levels.

The City of Torrance finds that impacts associated with consistency with the AQMP (Impact 5.2-1) would remain Significant and Unavoidable, and a Statement of Overriding Considerations is required.

Impact 5.2-2 Construction activities associated with buildout of the Torrance General Plan Update would generate short-term emissions that exceed the south coast air quality management district's regional significance thresholds for VOC, CO, NO_x, PM₁₀, and PM_{2.5}; cumulatively contribute to the South Coast Air Basin nonattainment designations for O₃, PM₁₀, and PM_{2.5}; and potentially elevate concentrations of air pollutants at sensitive receptors.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-12 of the DEIR. Information regarding specific development projects, soil types, and the locations of receptors would be needed in order to quantify the level of impact associated with construction activity. Due to the scale of development activity associated with buildout of the proposed Land Use Plan, emissions would be expected to exceed SCAQMD's regional significance thresholds. In accordance with SCAQMD's methodology, emissions that exceed the regional significance thresholds would cumulatively contribute to the nonattainment designations of the SoCAB. The SoCAB is designated as nonattainment for O₃ and particulate matter (PM₁₀ and PM_{2.5}). Emissions of VOC and NO_x are precursors to the formation of O₃. In addition, NO_x is a precursor to the formation of particulate matter (PM₁₀ and PM_{2.5}). Therefore, the project would cumulatively contribute to the nonattainment designations of the SoCAB for O₃ and particulate matter (PM₁₀ and PM_{2.5}). For this broadbased General Plan, it is not possible to determine whether the scale and phasing of individual projects involved in the buildout of the proposed Torrance General Plan Update would result in the exceedance of SCAQMD's short-term regional or localized construction emissions thresholds. Consequently, the General Plan buildout would have significant and unavoidable construction-related impacts.

Mitigation Measure:

5.2-1 The City of Torrance Community Development Department shall require that all new construction projects incorporate feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include:

- Requiring fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:
 - Requiring use of nontoxic soil stabilizers to reduce wind erosion.
 - Applying water every four hours to active soil-disturbing activities.

- Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 or more restrictive exhaust emission limits.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
- Using super-compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast Air Quality Management District Website: http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf.

Finding: The amount of construction required for General Plan buildout would most likely produce emissions that exceed SCAQMD thresholds. Specific project level emissions cannot be determined at the General Plan level. With the implementation of Mitigation Measure 5-2, construction-related emissions impacts would be lessened; but impacts would still remain significant and unavoidable.

The City of Torrance finds that impacts associated with construction-related emissions would remain Significant and Unavoidable, and a Statement of Overriding Considerations is required.

Impact 5.2-3 Buildout of the Torrance General Plan Update would generate long-term operational phase emissions that exceed the South Coast Air Quality Management District's regional significance thresholds for VOC, CO, NO_x, PM₁₀, and PM_{2.5} and cumulatively contribute to the South Coast Air Basin nonattainment designations for O₃, PM₁₀, and PM_{2.5}.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-12 of the DEIR. The increase in air pollutant emissions associated with buildout of the proposed Land Use Plan was estimated using the UBEMIS2007 emissions inventory model. The increase is based on the difference between existing land uses and land uses associated with buildout of the proposed Land Use Plan. Certain activities at each land use would have emissions that would be subject to SCAQMD regulation. Transportation emissions are also estimated using the UREMIS2007 emissions inventory model. Buildout of the proposed Land Use Plan would generate long-term stationary and mobile emissions that exceed the daily SCAQMD thresholds for all criteria pollutants.

Mitigation Measures:

Operational Emissions: No feasible mitigation measures are available that reduce operational phase emissions related to buildout of the proposed General Plan Update.

Finding: The buildout of Torrance in accordance with the Torrance General Plan Update would produce stationary and mobile source operational emissions that would exceed SCAQMD thresholds. There is no mitigation available that would reduce these emissions.

The City of Torrance finds that impacts associated with long term operational phase emissions (Impact 5.2-3) would remain Significant and Unavoidable, and a Statement of Overriding Considerations is required.

Impact 5.2-5 Approval of residential and other sensitive land uses in the vicinity of substantial pollutant generators would result in exposure of persons to substantial concentrations of air pollutant emissions.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-16 of the DEIR. While much of the City has been developed, the proposed Land Use Plan would potentially intensify the density of development in the City, including areas adjacent to industrial areas and freeways (see Chapter 3, *Project Description*). If new sensitive development, consistent with the proposed land use plan, were placed in the vicinity of any of these sources, then sensitive receptors could be exposed to significant concentrations of air pollutants. In accordance with CEQA, new development would be required to assess the localized air quality impacts from placement of new sensitive uses within the vicinity of such sources. Placement of sensitive uses near major pollutant sources would result in potential significant air quality impacts from the exposure of persons to substantial pollutant concentrations.

Mitigation Measures:

- 5.2-2 The City of Torrance shall evaluate new development proposals in the City for potential air quality incompatibilities according to the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective (April 2005). New development that is inconsistent with the recommended buffer distances shall only be approved if feasible mitigation measures, such as high-efficiency minimum efficiency reporting value filters have been incorporated into the project design to protect future sensitive receptors from harmful concentrations of air pollutants as a result of proximity to existing air pollution sources.

Finding: Mitigation for Impact 5.2-5 calls for the City's consultation with the California Air Resource Board's Air Quality and Land Use Handbook. This would reduce but not eliminate the significant impact related to the placement of sensitive land uses near pollution emission sources.

The City of Torrance finds that impacts associated with the placement of sensitive land uses near emission sources would remain Significant and Unavoidable, and a Statement of Overriding Considerations is required.

B. GREENHOUSE GAS EMISSIONS

Impact 5.6-1 Buildout of the City of Torrance would generate greenhouse gas emissions that would significantly contribute to global climate change impacts in California.

Support for this environmental impact conclusion is fully discussed starting on page 5.6-10 of the DEIR. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Mitigation Measures:

5.6-1 The City of Torrance shall prepare a Climate Action Plan within 18 months after adopting the proposed Torrance General Plan update. The climate action plan shall include an updated inventory of greenhouse gas emission sources, including those from municipal government operations and the community as a whole (community-wide), and a quantifiable greenhouse gas emissions reduction target. Local measures to reduce municipal government operations and communitywide greenhouse gas emissions by a minimum of 15 percent from existing levels or by a minimum of 0.7 million metric tons of carbon dioxide-equivalent (CO_{2e}) emissions at buildout shall be detailed in the climate action plan and measures shall be enforceable. The City shall monitor progress toward the greenhouse gas emissions reduction goal and prepare reports every five years that detail that progress. Measures listed below shall be considered for all new development between the time of adoption of the proposed Torrance General Plan update and adoption of the climate action plan. Local measures considered in the climate action plan shall include:

- Require all new or renovated municipal buildings to seek silver or higher Leadership in Energy and Environmental Design (LEED) standard, or compliance with similar green building rating criteria. (municipal government operations strategy)
- Require all municipal fleet purchases to be fuel-efficient vehicles for their intended use based on the fuel type, design, size, and cost efficiency. (municipal government operations strategy)
- For new development projects in Torrance that require demolition, require a demolition plan to reduce waste by recycling and/or salvaging nonhazardous construction and demolition debris. (community-wide strategy)
- Require that new developments design buildings to be energy efficient by siting them to take advantage of shade, prevailing winds, landscaping, and sun screening to reduce energy required for cooling. (community-wide strategy)
- Require that cool roofs and cool pavement be incorporated into the site design for new development. (community-wide strategy)
- Evaluate the feasibility of implementing a public transit fee to support the Los Angeles County Metropolitan Transportation Authority (Metro) in developing additional transit service in the City. (community-wide strategy)
- Require diesel emission reduction strategies to eliminate and/or reduce idling at warehouses throughout the City. (community-wide strategy)
- Install energy-efficient lighting and lighting control systems in all municipal buildings. (municipal government operations strategy)
- Require all new traffic lights installed be energy-efficient traffic signals. (municipal government operations strategy)
- Require all new landscaping irrigation systems installed in the City to be automated, high-efficient irrigation systems to reduce water use, and require use of bubbler irrigation; low-angle, low-flow spray heads; or moisture sensors. (community-wide strategy)
- Conduct energy efficiency audits of existing municipal buildings by checking, repairing, and readjusting heating, ventilation, and air conditioning systems; lighting; water heating equipment; insulation; and weatherization. (municipal government operations strategy)

5.6-2 Pursuant to a goal of overall consistency with the sustainable communities strategies, the City of Torrance shall evaluate new development with the development pattern set forth in the sustainable communities strategies plan or alternative planning strategy, upon adoption

of the plan by the Southern California Association of Government or South Bay Cities Council of Governments.

Finding: The greenhouse gas emissions caused by the development of the Torrance General Plan buildout would be reduced to less than significant levels with the implementation of Mitigation Measures 5.6-1 and 5.6-2.

The City of Torrance finds that impacts associated with greenhouse gas emissions (Impact 5.6-1) would be reduced to less than significant levels.

C. NOISE

Impact 5.11-2 Noise-sensitive uses could be exposed to elevated noise levels from transportation sources.

Support for this environmental impact conclusion is fully discussed starting on page 5.11-37 of the DEIR. The City applies the Torrance Land Use Compatibility Guidelines to new development for the purpose of assessing the compatibility of new development with existing noise sources, such as roadway noise. It is the policy of the City of Torrance to require new noise-sensitive single-family residential developments to achieve an exterior noise environment of up to 65 dBA CNEL and multifamily residential developments to achieve an exterior noise environment of up to 70 dBA CNEL with inclusion of noise-reduction features in the project design and construction. However, ambient noise levels that exceed 65 dBA CNEL are only significant if they encroach into noise-sensitive land uses (schools, playgrounds and parks, and residential uses). According to the noise contours and the proposed Land Use Plan, sensitive land uses would potentially be exposed to 65 dBA CNEL noise levels.

Mitigation Measure:

5.11-1 Prior to the issuance of building permits for any project that involves a noise-sensitive use within the 60 dBA CNEL contour along major roadways, freeways, or railways, the project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features (e.g., setbacks, berms, or sound walls) and/or required building acoustical improvements (e.g., sound transmission class rated windows, doors, and attic baffling), to ensure compliance with the City's Noise Compatibility Guidelines and the California State Building Code and California Noise Insulation Standards (Title 24 of the California Code of Regulations).

Finding: Even though implementation of Mitigation Measure 11-1 would reduce interior noise levels to 45 dBA or lower, exterior noise levels would still exceed 65 dBA in sensitive areas; and the Torrance General Plan Update would have significant impacts on noise - sensitive land uses (Impact 5.11-2).

The City of Torrance finds that impacts related to the exposure of exterior sensitive land uses to noise levels of 65 dBA to be Significant and Unavoidable, and a Statement of Overriding Considerations is required.

Impact 5.11-3 Construction activities associated with buildout of the individual land uses associated with the Proposed Land Use Plan would expose sensitive uses to strong levels of groundborne vibration.

Support for this environmental impact conclusion is fully discussed starting on page 5.11-36 of the DEIR. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, and slight structural damage at the highest levels. Vibration generated by construction equipment has the potential to be substantial. Significant vibration impacts may occur from construction equipment associated with development in accordance with the Torrance General Plan Update due to the potential for vibration-generating construction equipment being used in proximity to vibration-sensitive uses.

Mitigation Measure:

- 5.11-2 Individual projects that involve vibration-intensive construction activities, such as pile drivers, jack hammers, and vibratory rollers, near sensitive receptors shall be evaluated for potential vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceed the Federal Transit Administration vibration-annoyance criteria of 78 VdB during the daytime), additional requirements, such as use of less-vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., drilled piles to eliminate use of vibration-intensive pile driver).

Finding: Vibration-sensitive land uses would experience significant vibration impacts due to construction activities during the buildout of the Torrance General Plan Update.

Although mitigation measures have been incorporated into the project, the City of Torrance finds that impacts associated with air quality compatibility (Impact 5.11-3) would remain Significant and Unavoidable; and a Statement of Overriding Considerations is required.

Impact 5.11-4: Vibration-sensitive land uses could be exposed to strong levels of groundborne vibration.

Support for this environmental impact conclusion is fully discussed starting on page 5.11-38 of the DEIR. Vibrations caused by traffic and industrial land uses would be less than significant. Truck vibrations are felt mainly within five meters of the centerline. No structures would be built within five meters of the centerline so no traffic-caused vibration impacts would occur. In general, the majority of industrial uses would not be immediately adjacent to vibration-sensitive uses; and vibration-intensive equipment in a manufacturing zone is required to be constructed so as not to be perceptible at or beyond the property line without the aid of instruments. Consequently, no significant impacts would occur in regard to industrial-caused vibrations. The Burlington Northern Santa Fe Railroad would have significant impacts in relation to vibrations, however, since the proposed General Plan does not indicate the exact locations of new vibration-sensitive development. There is a potential for new vibration-sensitive land uses to be constructed within 200 feet from the rail line, which has the potential to be impacted by perceptible levels of vibration from rail operations. Consequently, vibration impacts from train operations could be potentially significant.

Mitigation Measure:

- 5.11-3 Prior to the issuance of building permits for any project that involves a vibration-sensitive use directly adjacent to the Burlington Northern Santa Fe railway, the development project application shall retain an acoustical engineer to evaluate potential for trains to create perceptible levels of vibration indoors. If vibration-related impacts are found, mitigation measures shall be implemented, such as use of concrete, iron, or steel, or masonry materials to ensure that levels of vibration amplification are within acceptable limits to building occupants, pursuant to the Federal Transit Administration vibration-annoyance criteria.

Finding: Operational vibration impacts would be significant in regard to train operations and the location of potential sensitive land uses near railroads. Mitigation Measure 11-3 would reduce but not eliminate these impacts.

The City of Torrance finds that railroad vibration impacts on sensitive land uses (Impact 5.11-4) would remain Significant and Unavoidable, and a Statement of Overriding Considerations is required.

Impact 5.11-5: Construction activities associated with buildout of the individual land uses of the Proposed Land Use Plan would substantially elevate noise levels in the vicinity of noise-sensitive land uses.

Support for this environmental impact conclusion is fully discussed starting on page 5.11-39 of the DEIR. Construction of individual projects in accordance with the General Plan buildout would require the use of a variety of construction equipment. Although construction activity would be temporary and restricted to 7:30 AM to 6:00 PM Monday through Friday and 9:00 AM to 5:00 PM on Saturday (Torrance Municipal Code Division 4, Chapter 6, *Noise Regulation*), it may occur outside of the restricted hours and near sensitive receptors. This would create significant impacts related to construction activity.

Mitigation Measure:

- 5.11-4 Construction activities associated with new development that occurs near sensitive receptors shall be evaluated for potential noise impacts. Mitigation measures—such as installation of temporary sound barriers for adjacent construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing nonessential idling of construction equipment to no more than five minutes—shall be incorporated into the construction operations to reduce construction-related noise to the extent feasible.

Finding: Construction-related noise level impacts would be significant in regard to potential proximity of sensitive land uses near individual project construction sites. Mitigation Measure 11-4 would reduce but not eliminate these impacts.

The City of Torrance finds that railroad vibration impacts on sensitive land uses (Impact 5.11-5) would remain Significant and Unavoidable, and a Statement of Overriding Considerations is required.

D. TRANSPORTATION AND TRAFFIC

Impact 5.15-1: Project-related trip generation would impact levels of service for the existing area roadway system.

Support for this environmental impact conclusion is fully discussed starting on page 5.15-14 of the DEIR. Five intersections are identified as having unacceptable levels of service (LOS E or below) upon buildout of the Torrance General Plan Update:

- Anza Avenue/Sepulveda Boulevard
- Crenshaw Boulevard/190th Street
- Crenshaw Boulevard/Pacific Coast Highway (SR-1)
- Hawthorne Boulevard (SR-107)/Sepulveda Boulevard
- Hawthorne Boulevard (SR-107)/Lomita Boulevard

Mitigation measures consistent with the proposed intersection improvements would reduce this potentially significant impact to a less than significant level.

Mitigation Measure:

5.15-1 The general plan circulation element identifies those roadways that are planned to accommodate current development and future growth established by the Land Use Element. The following improvements identified in Table 5.15-8 will be necessary to maintain acceptable levels of service within the anticipated theoretical buildout of the general plan:

- Anza Avenue/Sepulveda Boulevard – Widen eastbound Sepulveda Boulevard approach from one left-turn lane, one through lane and one shared through/right-turn lane to consist of one left-turn lane, two through lanes, and one right-turn lane.
- Crenshaw Boulevard/190th Street - Widen the westbound Crenshaw Boulevard approach from two left-turn lanes, two through lanes, and one right-turn lane to consist of two left-turn lanes, three through lanes, and one right-turn lane.
- Crenshaw Boulevard/Pacific Coast Highway (SR-1) - Modify the northbound Crenshaw Boulevard traffic signal phasing to include a northbound right-turn overlap, which will preclude movement from westbound to eastbound Pacific Coast Highway (SR-1).
- Hawthorne Boulevard (SR-107)/Sepulveda Boulevard - Modify the northbound Hawthorne Boulevard (SR-107) traffic signal phasing to include a northbound right-turn overlap, which will preclude U-turn movement from westbound to eastbound Sepulveda Boulevard.
- Hawthorne Boulevard (SR-107)/Lomita Boulevard - Modify the westbound Lomita Boulevard traffic signal phasing to include a westbound right-turn overlap, which will preclude U-turn movement from southbound to northbound Hawthorne Boulevard (SR-107).

Finding: The mitigation measure identified above would reduce the significant impacts at the intersections identified to levels that are less than significant. The City of Torrance hereby finds that implementation of the mitigation measure above is feasible, and it is therefore adopted.

III. FINDINGS ON PROJECT ALTERNATIVES

The following discussion is intended to provide a summary of the alternatives considered and rejected in the City of Torrance General Plan Update DEIR, including the No Growth/No Development, Agricultural Land Preserve, and the Increased Residential Intensity.

A. ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the DEIR.

Among the factors that can be used to eliminate alternatives from detailed consideration in an EIR are “failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts” (CEQA Guidelines Section 15126.6[c]). Several alternatives were eliminated during the scoping/planning process, either because they were deemed infeasible or because they were technologically or environmentally inferior as compared to the proposed project.

Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (Guidelines Sec. 15126[5][B][1]). Since the proposed project consists of a General Plan Update that encompasses the entire City of Torrance, an alternative site analysis is not appropriate. However, areas proposed for development or intensification were reviewed to determine if development could be redirected to less sensitive areas. Since the City of Torrance is primarily builtout, there are very few undeveloped areas. As a result, shifting development intensities, while feasible, would not result in a reduction of significant impacts. Thus, alternative development areas were rejected and are not analyzed in detail in this document.

Finding: The lack of alternative development areas within the City makes infeasible this project alternative identified in the FEIR. (Public Resources Code § 21081(a)(3), Guidelines § 15091(a)(3)).

Facts in Support of Finding: The Alternative Development Scenario would not reduce any of the significant impacts associated with the proposed buildout of the Torrance General Plan Update. Limited undeveloped land in the City allows for few alternative development locations.

B. ALTERNATIVES SELECTED FOR ANALYSIS

The CEQA Guidelines indicate that an EIR must “describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (Guidelines Sec. 15126.6[a]). Accordingly, the alternatives selected for review pursuant to this EIR focus on: (a) the specific General Plan policies pertaining to project site and (b) alternatives that could eliminate or reduce significant environmental impacts to a level of insignificance, consistent with the project objectives (i.e., the alternatives could impede to some degree the attainment of project objectives, but still would enable the project to obtain its basic objectives). The alternatives analyzed in the following sections include:

- No Project/Existing General Plan Alternative
- Mixed-Use Development Alternative
- Increased Residential Land Use Alternative

No-Project/Existing General Plan Alternative

This alternative analyzes the effects of continued implementation of the City's existing General Plan. This alternative assumes the existing General Plan remains as the adopted long-range planning policy document for the City. Development would continue to occur within the City in accordance with the existing General Plan, zoning code, and specific plans. The existing General Plan land-use map consists of various land use designations. Broad categories of these designations include residential, commercial, industrial, public/quasi-public/open space, and airport. Residential development represents the predominant land use in Torrance, with housing covering 49 percent of the City's land area. Industrial uses occupy the second largest land area, with 2,276 acres (22 percent). Public/quasi-public/open space uses represent the third-largest land use in the City (12 percent). Torrance has a limited supply of vacant land. Of the 116 acres of vacant land, most of the area (94 percent) lies within commercial and industrial areas. The remainder (6 percent) lies within residential areas. The General Plan would allow for the development of 54,476 dwelling units and 60,891,740 square feet of nonresidential space, with a buildout population of 135,864. The Torrance General Plan Update would allow for 57,536 dwelling units and 62,163,561 square feet of nonresidential development, with a buildout population of 147,082.

1. Ability to Reduce Environmental Impacts

This alternative would result in reduced impacts to geology and soils, greenhouse gas (GHG) emissions, population and housing, public services, recreation, and transportation and traffic. Buildout under the General Plan would result in 11,218 fewer residents, 3,060 fewer dwelling units than under the City of Torrance General Plan Update. This would result in a smaller population with lesser demand on public services, including police, fire, library, and school services, utility agencies, and recreational centers and parks. It would maintain a more ideal jobs-to-housing ratio and reduce population and housing impacts. A smaller population and buildout square footage would also result in fewer people and structures being exposed to geological hazards. It would also reduce greenhouse gas impacts due to reduced operational and construction emissions.

This alternative would have similar impacts related to aesthetics, biology, cultural resources, hazards and hazardous materials, hydrology and water quality, and mineral resources. The reduction in development as part of the existing General Plan would not reduce impacts related to these environmental topics.

Air quality and GHG emissions impacts would be slightly less but still significant and unavoidable under the No-Project/Existing General Plan Alternative. Although this alternative would reduce both long- and short-term pollutant emissions generated in the City of Torrance, it would not eliminate significant short- and long-term criteria pollutant contributions to VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}; would not be consistent with the air quality management plan, as criteria pollutants thresholds would be exceeded; and would cumulatively contribute to the SoCAB nonattainment designations for O₃, PM₁₀, and PM_{2.5}.

Land-use impacts under the No-Project/Existing General Plan Alternative would not be significant or unavoidable but they would be greater than under the City of Torrance General Plan Update. The No-Project/Existing General Plan Alternative would not provide any policy direction or land use guidance and would not allow Torrance to implement all of the objectives of the General Plan Update.

Noise impacts would be similar between the City of Torrance General Plan Update and the No-Project/Existing General Plan Alternative. Overall, this alternative would substantially reduce short- and long-term noise impacts of the proposed project. However, buildout of the existing General Plan would continue to expose sensitive receptors to elevated noise levels and strong vibration from construction and result in an increase in traffic on the local roadways, which would substantially increase noise levels. This alternative would substantially reduce but not eliminate noise impacts.

2. Ability to Attain Project Objectives

The adoption of the No-Project/Existing General Plan Alternative would leave the City open for future growth that may not be compatible with the goals and objectives of the City. In addition, such growth would not provide the mix of housing types and uses that would be allowed under the City of Torrance General Plan Update. The No-Project/Existing General Plan Alternative fails to accomplish the project objectives in the City's vision and has other potential environmental impacts resulting from its implementation. Specifically, the No-Project/Existing General Plan Alternative does not promote mixed-use development where applicable, encourage revitalization and conservation of blighted areas, promote preservation of the City's character, or encourage a wide range of alternative transportation opportunities.

Finding: Specific economic, legal, social, technological, or other considerations make infeasible this project alternative identified in the FEIR (Public Resources Code § 21081(a)(3), Guidelines § 15091(a)(3)).

Facts in Support of Finding: The No-Project/Existing General Plan Alternative is less than desirable because it does not eliminate significant and unavoidable impacts related to air quality, land use, and noise, and it does not meet certain project objectives identified in the FEIR.

Mixed-Use Development Alternative

The Mixed-Use Development Alternative would concentrate a high-density corridor of mixed-use development likely along the length of Hawthorne Boulevard or Sepulveda Boulevard, to take advantage of the proximity to residential uses that could benefit from and support the development alternative, and the availability of alternative transportation opportunities. The Mixed-Use Development Alternative was considered to reduce the traffic, greenhouse gas emission, air quality, and noise impacts of the proposed project through a reduction of vehicle trips within the City. The development would support buildings consisting of first-floor retail establishments (assumes 250,000 square feet of retail use and 490 additional employees), up to four stories of residential uses (at approximately 40 du/ac, assumes 1,000 total units throughout the project), and allow for future development of a regional transit hub.

1. Ability to Reduce Environmental Impacts

The Mixed-Use Development Alternative would result in similar impacts with regard to aesthetics, biological resources, cultural resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, and population and housing. It would reduce impacts related to greenhouse gas emissions, hazards and hazardous materials, and traffic and transportation. In addition, the significant impacts to air quality and noise would be relatively the same as for the proposed project. However, this alternative would increase the project impacts to public services, recreation, and utilities.

Because of the mixed-use characteristics, this alternative would reduce overall vehicle miles travelled, therefore reducing, but not eliminating, overall traffic impacts. This would also reduce the greenhouse gas emissions during project operation and the length and frequency of routine trips to transport of hazardous materials because of the proximity between land uses.

This alternative would increase the population of the City by 2,630, increasing demand on public services, including police, fire, schools, and library service. As a result, this alternative would be considered environmentally inferior to the proposed project. Similarly, this alternative would increase impacts on recreational areas and utilities because of the increase in residents and housing units.

Noise and air quality impacts would remain similar to the proposed project. Both would be significant and unavoidable, although noise impacts would be slightly reduced.

2. Ability to Attain Project Objectives

The adoption of the Mixed-Use Development Alternative would be compatible with the goals and objectives identified by the City for growth through 2030 and would accomplish the project objectives in the City's vision.

Finding: Specific economic, legal, social, technological, or other considerations make infeasible this project alternative identified in the FEIR (Public Resources Code § 21081(a)(3), Guidelines § 15091(a)(3)).

Facts in Support of Finding: The Mixed-Use Development Alternative would be considered environmentally superior to the proposed project in the areas of air quality, greenhouse gas emissions, and transportation and traffic. This alternative would be considered environmentally inferior to the proposed project in the areas of public services, recreation, and utilities and services systems, due primarily to the increase in population. This alternative would meet all project objectives for allowing the City to achieve its vision.

Increased Residential Land Use Alternative

SCAG often asserts that a jobs/housing ratio of 1.50 typifies a "balanced" city. Since it is projected that the jobs/housing ratio in Torrance would be approximately 1.90, a jobs-rich ratio, this alternative will look at the impacts resulting from increased residential uses in the City. In comparison to the proposed general plan update, residential land uses have been increased by 10 percent, resulting in 63,290 estimated dwelling units, and a subsequent 10 percent increase in population, resulting in approximately 161,790 residents. Nonresidential land uses have been decreased by 10 percent, resulting in approximately 55,947,600 square feet. Projected employment opportunities would be reduced 10 percent, resulting in a forecast of approximately 95,120 jobs and a jobs/housing ratio of 1.50.

1. Ability to Reduce Environmental Impacts

The Increased Residential Alternative would result in similar impacts to biological resources, cultural resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, and (operational) noise. Construction-related impacts to air quality and noise would also be similar. However, operational impacts related to air quality and noise would be less than the proposed plan of development. Greenhouse gas emissions would be slightly reduced, but not eliminated. Less commercial square footage would generate fewer operational greenhouse gas emissions. However, construction-related greenhouse gas emissions would be similar. Utilities and service systems, public services, and recreation would all experience slightly worse impacts because of the additional 5,754 dwelling units that would increase the buildout population by 14,708.

This alternative would reduce aesthetic, hazards and hazardous materials, population and housing, and transportation impacts.

Although this alternative would reduce long-term pollutant emissions generated in the City of Torrance and have similar short-term pollutant emissions, it would not eliminate significant short- and long-term criteria pollutant contributions to VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}; would not be consistent with the air quality management plan, as criteria pollutants thresholds would be exceeded; and would cumulatively contribute to the SoCAB nonattainment designations for O₃, PM₁₀, and PM_{2.5}.

Construction noise impacts would generally be similar to the proposed project. However, due to the scale of development activity associated with buildout of this alternative, construction activities associated with any individual development that may still occur near existing noise-sensitive receptors, and noise disturbances that may occur for prolonged periods of time, construction noise impacts from buildout of this alternative would remain significant and unavoidable. Consequently, this alternative would substantially reduce but not eliminate the project's significant and unavoidable construction noise and vibration impacts.

By increasing the residential land uses by 10 percent, the number of residential units would be increased by 5,754. This would cause an increase in buildout population of 14,708. Service providers, including fire, police, library, and schools, would need to accommodate for this additional population. Utility providers for water, sewer, and stormwater runoff conveyance and treatment systems, and for dry utilities, including electricity and telecommunication systems, would also need to accommodate for additional population. This would result in higher impacts under this alternative scenario.

Overall, the Increased Residential Land Use Alternative would be considered environmentally superior to the proposed project in the areas of aesthetics, air quality, hazards and hazardous materials, population and housing, and traffic and transportation. This alternative would be considered environmentally inferior to the proposed project in the areas of public services, recreation, and utilities and service systems.

2. Ability to Attain Project Objectives

The adoption of the Increased Residential Land Use Alternative would be compatible with most of the goals and objectives identified by the City for growth through 2030, but it would not accomplish all of the project objectives in the City's vision. The reduction in the amount of employment-based land uses would reduce the number of jobs in the City, preventing the ability of the City to preserve its industrial and jobs base as thoroughly as with the proposed plan of development. Similarly, it would reduce the City's ability to accommodate a diverse range of commercial uses.

Finding: Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible this project alternative identified in the FEIR (Public Resources Code § 21081(a)(3), Guidelines § 15091(a)(3)).

Facts in Support of Finding: The Increased Residential Land Use Alternative is less than desirable because it does not eliminate significant and unavoidable impacts related to air quality and noise. Also, this alternative would not meet project objectives related to continuing to support employment-based and commercial land uses in the City.

IV. STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks in determining whether to approve the project under consideration. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered "acceptable" (State CEQA Guidelines Section 15093[a]). However, CEQA requires the agency to explain, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to

mitigate. Such reasons must be based on substantial evidence in the EIR or elsewhere in the administrative record (State CEQA Guidelines Section 15093 [b]). The agency's statement is referred to as a "Statement of Overriding Considerations."

A. SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The following adverse impacts of the project are considered significant and unavoidable based on the FEIR and the findings discussed in Sections II and III of this document.

Air Quality – Consistency with the AQMP. The project would not be consistent with the AQMP because air pollutant emissions associated with buildout of the City of Torrance would cumulatively contribute to the nonattainment designations in the SoCAB. Furthermore, buildout of the Proposed Land Use Plan would exceed current estimates of population, employment, and vehicle miles traveled for Torrance; and therefore, these emissions are not included in the current regional emissions inventory for the SoCAB. The project would be considered inconsistent with the AQMP.

Air Quality – Construction-Related Impacts. Construction activities associated with buildout of the Torrance General Plan Update would generate short-term emissions that exceed the SCAQMD's regional significance thresholds for VOC, CO, NO_x, PM₁₀, and PM_{2.5}. They would also cumulatively contribute to the SoCAB nonattainment designations for O₃, PM₁₀, and PM_{2.5} and potentially elevate concentrations of air pollutants at sensitive receptors.

Air Quality – Operational Phase Impacts. Buildout of the Torrance General Plan Update would generate long-term operational phase emissions that exceed the SCAQMD's regional significance thresholds for VOC, CO, NO_x, PM₁₀, and PM_{2.5} and cumulatively contribute to the South Coast Air Basin nonattainment designations for O₃, PM₁₀, and PM_{2.5}.

Air Quality – Land Use Compatibility. Approval of residential and other sensitive land uses in the vicinity of substantial pollutant generators, specifically roadway segments with high traffic volumes and industrial/warehouse areas, would result in exposure of persons to substantial concentrations of air pollutant emissions.

Noise – Transportation Sources. Buildout of the Torrance General Plan Update would result in the placement of noise-sensitive land uses near transportation land uses that have noise environments exceeding the City's normally accepted land-use compatibility criterion.

Noise – Construction-Related Vibration. Construction activities associated with buildout of the individual land uses associated with the proposed Land Use Plan would expose sensitive uses to strong levels of groundborne vibration.

Noise – Construction-Related Noise. Construction activities associated with buildout of the individual land uses of the proposed Land Use Plan would substantially elevate noise levels in the vicinity of noise-sensitive land uses.

B. CONSIDERATIONS IN SUPPORT OF THE STATEMENT OF OVERRIDING CONSIDERATIONS

The following section describes the benefits of the project that outweigh the project's unavoidable adverse effects and provides specific reasons for considering the project acceptable even though the FEIR has indicated that there will be significant project impacts that are infeasible to mitigate.

Implements the Objectives Established for the Project:

The objectives of the Torrance General Plan Update would guide development in the City in a way that would improve the quality of life and allow for planned and sustainable growth in area of the City which can accommodate such growth while reducing environmental impacts, maintaining a balanced community, and preserving the desirable characteristics of established neighborhoods. The following objectives have been established for the City of Torrance General Plan Update project and will aid decision makers in their review of the project and associated environmental impacts:

- To provide a comprehensive update to the City's General Plan that establishes the goals and policies that create a built environment that fosters the enjoyment, financial stability and well being of the entire community.
- To designate the distribution, location, balance and extent of land uses including residential, commercial, industrial and open space.
- To ensure that future development will occur consistent with the high standards that the City has set and that make Torrance a desirable place to live.
- To preserve the City's valuable industrial core and jobs base.
- To accommodate a diverse range of commercial uses at locations throughout Torrance to meet the local shopping and service needs of residents, and to create opportunities for revenue generation at regional centers.
- To encourage the revitalization and conversion of older, under-performing, blighted commercial and industrial areas.
- To support, on a limited basis, mixed-use development approached where such development is compatible with surrounding uses.
- To ensure that future growth will be respectful towards the City's cultural resources and architectural heritage, and to encourage preservation of Old Torrance's distinct character and unique characteristics, including the street layout and structures.
- To encourage alternative modes of transportation, such as walking, bicycling and transit.
- To seek ways to enhance the level of service of the citywide roadway system while minimizing traffic intrusion into residential neighborhoods.
- To continue to maintain a high level of public services to the community by protecting and enhancing public resources such as schools, libraries, the airport, hospitals, parks and open space, and community centers.

Torrance has limited capacity for growth, so these objectives would be applied toward existing development as much as toward new projects. The application of these objectives toward existing development would improve the City's impact on the environment by enhancing open spaces and parks and by encouraging alternative transportation modes. They would have beneficial effects on the economic and cultural conditions of the City.

Torrance General Plan Update Principles Work To Improve Quality of Life and the Physical Environment

Although development in Torrance would have significant impacts on the environment (air quality and noise), a number of the policies found in the General Plan would reduce these impacts on the environment and promote more environmentally sustainable development than would otherwise result in the development of Torrance. These types of policies include those that:

- Promote efficient energy use (CR.20.1–20.9)
- Promote the wise use of water (CR.15.1–15.9)
- Improve air quality (CR.13.7–13.8)
- Preserve historic resources (CR.12.1–12.3)
- Reduce emissions by reducing congestion and encouraging alternative modes of transportation (CI.3.1–3.6, LU.4.1–4.2, LU.6.3, LU.7.2, and LU.11.7)
- Reduce greenhouse gas emissions (CR.13.1–13.6 and CR.14.1–14.4)
- Reduce the urban heat island effect (LU.5.3, LU.9.1, C.6.2, CR.1.1–1.3, CR.2.1, CR.4.1–4.3, CR.7.5, CR.7.7, CR.15.1–15.2, CR.17.1–17.3, and CR.22.1–22.7)
- Ensure noise compatibility for noise-sensitive uses (N.3.1–3.4)
- Improve pedestrian environments and create healthy, safe neighborhoods in Torrance (CI.1.4 and CI.8.1–8.9)
- Promote place-making (CI.6.1–6.3, CI.7.5, CI.8.1–8.3, CR.4.1–CR.4.3, CR.8.2, CR.8.4, CR.12.1–12.3, CR.18.2,–CR.18.3)
- Encourage the preservation of open space and critical habitats for endangered resources and natural communities (CR.1.1–1.3, CR.2.1, CR.3.1–3.8, CR.4.1–4.3, and CR.5.1–5.4)

C. CONCLUSION

For the abovementioned reasons, implementation of the Torrance General Plan Update would have environmental, economic, and social benefits that outweigh the unavoidable adverse environmental impacts of the physical development of the City. The Torrance General Plan Update would help improve local air quality and greenhouse gas emission impacts by implementing General Plan policies and a climate action plan; enhance open space, recreational, ecological, and pedestrian environments; and reduce the environmental impacts associated with traffic congestion.

V. REFERENCES

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**MITIGATION
MONITORING
PROGRAM
FOR:**

**CITY OF TORRANCE
GENERAL PLAN
UPDATE EIR**



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1. Introduction

1.1 PURPOSE OF MITIGATION MONITORING PROGRAM

This Mitigation Monitoring Program has been developed to provide a vehicle by which to monitor mitigation measures and conditions of approval outlined in the Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2008111046. The Mitigation Monitoring Program has been prepared in conformance with Section 21081.6 of the Public Resources Code and City of Torrance Monitoring Requirements. Section 21081.6 states:

- (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
 - (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.
 - (2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.



1.2 PROJECT SUMMARY

The proposed project is the preparation of the City of Torrance General Plan Update, which consists of an update of the Torrance General Plan Elements and Land Use map. City of Torrance General Plan Update provides guidance that shapes the community for the next 15 to 20 years into the future. The General Plan includes the elements required by the state (circulation, conservation, housing, land use, noise, open space, and safety elements). The conservation and open space elements have been combined into one community resources element.

Pursuant to CEQA Guidelines Section 15064(d), the EIR considers the direct physical changes and reasonably foreseeable indirect physical changes in the environment that would be caused by the City of Torrance General Plan Update. Consequently, the EIR focuses on impacts from changes to land use associated with buildout of the Proposed Land Use Plan and impacts from the resultant population and employment growth in the City. The City of Torrance General Plan Update Proposed Land Use Plan for the ultimate development of the City is not linked to a timeline. However, for the purpose of this environmental analysis, buildout of the Proposed Land Use Plan is forecast for the year 2035.

1. Introduction

1.3 PROJECT LOCATION

The City of Torrance is in southwestern Los Angeles County, in the highly urbanized South Bay region. The South Bay consists of the cities and communities of Compton, Gardena, Carson, Redondo Beach, Palos Verdes Estates, Lomita, Rolling Hills Estates, Rancho Palos Verdes, San Pedro, Wilmington, Harbor City, portions of Long Beach, and Torrance.

Communities directly adjacent to Torrance include Rolling Hills Estates and Palos Verdes Estates to the south, Redondo Beach to the east, Gardena and Lawndale to the north, and Carson to the west. The Pacific Ocean forms a small portion of the western border of the City. Interstate 405 (I-405) transects the northern portion of the City and provides regional access, along with I-110.

1.4 ENVIRONMENTAL IMPACTS

The environmental document for this project is a "program EIR" as defined by State CEQA Guidelines (Section 15161, California Code of Regulations, Title 14, Division 6, Chapter 3). As provided in Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that may be characterized as one large project that are related either 1) geographically; 2) as logical parts of a chain of contemplated events; 3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and have generally similar environmental effects that can be mitigated in similar ways.

Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are typically more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a Project EIR. Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document needs to be prepared. However, if the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the Program EIR scope; and additional environmental documents may not be required (Guidelines Section 15168[c]). When a Program EIR is relied on for a subsequent activity, the lead agency must incorporate feasible mitigation measures and alternatives developed in the Program EIR into the subsequent activities (Guidelines Section 15168[c][1]). If a later activity would have effects that were not examined in the Program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. Pursuant to Sections 15126.2 and 15126.4 of the State CEQA Guidelines, the EIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance.

1.4.1 Impacts Considered Less Than Significant

Ten environmental categories are identified as having less than significant impacts that do not require mitigation. These categories are:

- Aesthetics
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

1.4.2 Potentially Significant Adverse Impacts That Can Be Mitigated, Avoided, or Substantially Lessened

The following have been identified as potentially resulting in significant adverse impacts that can be mitigated, avoided, or substantially lessened:

- Greenhouse Gas Emissions: Mitigation Measures 6-1 and 6-2 would reduce greenhouse gas emissions impacts to less than significant (Impact 5.6-1).
- Noise: Mitigation Measure 12-3 would ensure that any new vibration-sensitive structures near the Burlington Northern Santa Fe Railroad right-of-way would be constructed so that train-related vibration would not be perceptible and operational vibration impacts would be less than significant (Impact 5.11-4).
- Transportation and Traffic: Mitigation Measure 15-1 contains area roadway improvements that would reduce impacts related to the level of service on roadway networks in Torrance (5.15-1).

1.4.3 Unavoidable Significant Adverse Impacts

There are two environmental categories considered to have impacts that would be significant and unavoidable and would not be lessened through mitigation.

Air Quality

The project would not be consistent with the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP) because air pollutant emissions associated with buildout of the City of Torrance would cumulatively contribute to the nonattainment designations in the South Coast Air Basin (SoCAB). Furthermore, buildout of the proposed land use plan would exceed current estimates of population, employment, and vehicle miles traveled for Torrance and, therefore, these emissions are not included in the current regional emissions inventory for the SoCAB. As both criteria must be met in order for a project to be considered consistent with the AQMP, the project would be considered inconsistent with the AQMP. Consequently, this impact would remain significant and unavoidable. There is no feasible mitigation for this impact.

Construction activities associated with buildout of the Torrance General Plan Update would generate short-term emissions that exceed the SCAQMD's regional significance thresholds for VOC, CO, NO_x, PM₁₀, and PM_{2.5}. They would also cumulatively contribute to the SoCAB nonattainment designations for O₃, PM₁₀, and PM_{2.5} and potentially elevate concentrations of air pollutants at sensitive receptors. Mitigation measure 2-1 would reduce short term construction impacts but not to levels that are less than significant.

Buildout of the Torrance General Plan Update would generate long-term operational phase emissions that exceed the SCAQMD's regional significance thresholds for VOC, CO, NO_x, PM₁₀, and PM_{2.5} and cumulatively contribute to the SoCAB nonattainment designations for O₃, PM₁₀, and PM_{2.5}. There are no feasible mitigation measures available.

Approval of residential and other sensitive land uses in the vicinity of substantial pollutant generators, specifically roadway segments with high traffic volumes and industrial/warehouse areas, would result in exposure of persons to substantial concentrations of air pollutant emissions. Mitigation Measure 2-2 would reduce air pollution impacts to sensitive receptors but they would not be reduced to levels that are less than significant.



1. Introduction

Noise

Buildout of the Torrance General Plan Update would result in the placement of noise-sensitive land uses near transportation land uses that have noise environments that exceed the City's normally accepted land use compatibility criterion (Impact 5.11-2). Mitigation Measure 11-1 would require land uses within these areas to conduct an acoustic analysis and identify, where appropriate, site design features (e.g., setbacks, berms, or sound walls) and/or required building acoustical improvements (e.g., sound transmission class rated windows, doors, and attic baffling), to ensure compliance with the City's Noise Compatibility Guidelines and the California State Building Code and California Noise Insulation Standards (Title 24 of the California Code of Regulations).

Construction activities associated with buildout of the individual land uses associated with the proposed land use plan would expose sensitive uses to strong levels of groundborne vibration. Mitigation Measure 11-2 would reduce the impacts caused by construction-related vibrations on sensitive receptors, but it would not reduce the impact to less than significant.

Construction activities associated with buildout of the individual land uses of the Proposed Land Use Plan would substantially elevate noise levels in the vicinity of noise-sensitive land uses. Mitigation Measure 11-4 would reduce impacts through the use of sound barriers, installation of equipment mufflers, and reducing construction truck idling time; but they would not be reduced to impacts that are less than significant.

2. *Mitigation Monitoring Process*

2.1 **MITIGATION MONITORING PROGRAM ORGANIZATION**

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). The mitigation monitoring and reporting program is designed to ensure compliance with adopted mitigation measures during project implementation. For each mitigation measure recommended in the EIR, specifications are made herein that identify the action required and the monitoring that must occur. In addition, a responsible agency is identified for verifying compliance with individual conditions of approval contained in the Mitigation Monitoring Program (MMP). In order to effectively track and document the status of mitigation measures, a mitigation matrix has been prepared and includes:

- Responsibility for implementation
- Timing
- Responsibility for monitoring
- Monitor

Mitigation measure timing of verification has been apportioned into several specific timing increments. Of these, the most common are:

- Prior to project approval
- Prior to issuance of grading permit(s)
- During construction

Information pertaining to compliance with mitigation measures or any necessary modifications or refinements will be documented in the comments portion of the matrix.

2.2 **MITIGATION MONITORING PROCEDURES**

The City of Torrance Community Development Department is the designated lead agency for the Mitigation Monitoring and Reporting Program. The City of Torrance includes the Mitigation Measures within the Special Conditions of Approval. The City is responsible for review of all monitoring reports, enforcement actions, and document disposition. The Community Development Department shall designate a Project Mitigation Monitor for the proposed project.

2.2.1 ***In-Field Monitoring***

The Responsible Monitoring Party shall exercise caution and professional practices at all times when monitoring construction. Protective wear (hard hats, glasses, etc.) shall be worn at all times in construction areas. Injuries shall be reported immediately to the Project Mitigation Monitor.

2.2.2 ***Coordination with Contractors***

The construction manager/superintendent is responsible for coordination of contractors and for contractor completion of required measures in accordance with the provisions of this program.



2. Mitigation Monitoring Process

2.2.3 Recognized Experts

The use of recognized experts as a component of the monitoring team is required to ensure compliance with scientific and engineering mitigation measures. While the recognized experts assess compliance with required mitigation measures, consultation with the City of Torrance planning staff shall take place in the event of a dispute.

2.2.4 Enforcement

Agencies may enforce conditions of approval through their existing police power, using stop-work orders, fines, infraction citations, loss of entitlements, refusal to issue building permits or certificates of use and occupancy or, in some cases, notice of violation for tax purposes. Criminal misdemeanor sanctions could be available where the agency has adopted an ordinance requiring compliance with the monitoring program, similar to the provision in many zoning ordinances that affirms the enforcement power to bring suit against violators of the ordinances.

3. Mitigation Monitoring Requirements

3.1 PRE-MONITORING MEETING

A pre-monitoring meeting will be scheduled to review mitigation measures, implementation requirements, schedule conformance, and mitigation monitoring committee responsibilities. Committee rules are established, the entire mitigation monitoring program is presented, and any misunderstandings are resolved.

3.2 CATEGORIZED MITIGATION MEASURES/MATRIX

Project-specific mitigation measures have been categorized in matrix format, as shown in Table 3-1. The matrix identifies the environmental factor, specific mitigation measures, schedule, and responsible monitor. The mitigation matrix will serve as the basis for scheduling the implementation of, and compliance with, all mitigation measures.

3.3 IN-FIELD MONITORING

Project monitors and technical subconsultants shall exercise caution and professional practices at all times when monitoring implementation of mitigation measures. Protective wear (e.g., hard hat, glasses) shall be worn at all times in construction areas. Injuries shall be immediately reported to the mitigation monitoring committee.

3.4 DATA BASE MANAGEMENT

All mitigation monitoring reports, letters, and memos shall be prepared utilizing Microsoft Word software on IBM-compatible PCs.

3.5 COORDINATION WITH CONTRACTORS

The construction manager is responsible for coordination of contractors and for contractor completion of required mitigation measures.

3.6 LONG-TERM MONITORING

Long-term monitoring related to several mitigation measures will be required, including fire safety inspections. Post-construction fire inspections are conducted on a routine basis by the Torrance Fire Department.



3. Mitigation Monitoring Requirements

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3. Mitigation Monitoring Requirements

**Table 3-1
Mitigation Monitoring Requirements**

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>5.2 AIR QUALITY</p> <p>2-1 The City of Torrance Community Development Department shall require that all new construction projects incorporate feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include:</p> <ul style="list-style-type: none"> • Requiring fugitive dust control measures that exceed SCAQMD's Rule 403, such as: <ul style="list-style-type: none"> ◦ Requiring use of nontoxic soil stabilizers to reduce wind erosion. ◦ Applying water every four hours to active soil-disturbing activities. ◦ Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 or more restrictive exhaust emission limits. • Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards. • Limiting nonessential idling of construction equipment to no more than five consecutive minutes. • Using super-compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufacturers can be found on the SCAQMD's website: http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf. 	<p>City of Torrance Community Development Department in coordination with the landowner/project applicant's construction contractor</p>	<p>On-going during project construction</p>	<p>City of Torrance Community Development Department</p>	

3. Mitigation Monitoring Requirements

**Table 3-1
Mitigation Monitoring Requirements**

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>2-2 The City of Torrance shall evaluate new development proposals in the City for potential air quality incompatibilities according to the California Air Resources Board's <i>Air Quality and Land Use Handbook: A Community Health Perspective</i> (April 2005). New development that is inconsistent with the recommended buffer distances shall only be approved if feasible mitigation measures, such as high-efficiency minimum efficiency reporting value filters, have been incorporated into the project design to protect future sensitive receptors from harmful concentrations of air pollutants as a result of proximity to existing air pollution sources.</p>	<p>City of Torrance Community Development Department in coordination with the landowner/project applicant</p>	<p>Prior to individual project approvals</p>	<p>City of Torrance Community Development Department</p>	
<p>5.6 GREENHOUSE GAS EMISSIONS</p>				
<p>6-1 The City of Torrance shall prepare a Climate Action Plan within 18 months after adopting the proposed Torrance General Plan update. The climate action plan shall include an updated inventory of greenhouse gas emission sources, including those from municipal government operations and the community as a whole (community-wide), and a quantifiable greenhouse gas emissions reduction target. Local measures to reduce municipal government operations and community-wide greenhouse gas emissions by a minimum of 15 percent from existing levels or by a minimum of 0.7 million metric tons of carbon dioxide-equivalent (CO_{2e}) emissions at buildout shall be detailed in the climate action plan and measures shall be enforceable. The City shall monitor progress toward the greenhouse gas emissions reduction goal and prepare reports every five years that detail that progress. Measures listed below shall be considered for all new development between the time of adoption of the proposed Torrance General Plan update and adoption of the climate action plan. Local measures considered in the climate action plan shall include:</p> <ul style="list-style-type: none"> • Require all new or renovated municipal buildings to seek silver or higher Leadership in Energy and Environmental Design (LEED) standard, or compliance with similar green 	<p>City of Torrance Community Development Department</p>	<p>Prior to individual project approval</p>	<p>City of Torrance Community Development Department</p>	<p>City of Torrance General Services Department</p>

3. Mitigation Monitoring Requirements

**Table 3-1
Mitigation Monitoring Requirements**

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<ul style="list-style-type: none"> building rating criteria. (municipal government operations strategy) Require all municipal fleet purchases to be fuel-efficient vehicles for their intended use based on the fuel type, design, size, and cost efficiency. (municipal government operations strategy) For new development projects in Torrance that require demolition, require a demolition plan to reduce waste by recycling and/or salvaging nonhazardous construction and demolition debris. (community-wide strategy) Require that new developments design buildings to be energy-efficient by siting them to take advantage of shade, prevailing winds, landscaping, and sun-screening to reduce energy required for cooling. (community-wide strategy) Require that cool roofs and cool pavement be incorporated into the site design for new development. (community-wide strategy) Evaluate the feasibility of implementing a public transit fee to support the Los Angeles County Metropolitan Transportation Authority (Metro) in developing additional transit service in the City. (community-wide strategy) Require diesel emission reduction strategies to eliminate and/or reduce idling at warehouses throughout the City. (community-wide strategy) 	<p>City of Torrance Public Works Department</p> <p>City of Torrance Community Development Department/Public Works Department</p> <p>City of Torrance Community Development Department/Individual Project Contractor</p> <p>City of Torrance Community Development Department/Individual Project Contractor</p> <p>City of Torrance Transit Department</p> <p>City of Torrance Community Development Department/Public Works Department</p>	<p>Ongoing</p> <p>Prior to individual project approval/Ongoing</p> <p>Ongoing</p>	<p>City of Torrance Public Works Department</p> <p>City of Torrance Community Development Department/Public Works Department</p> <p>City of Torrance Community Development Department</p> <p>City of Torrance Community Development Department</p> <p>City of Torrance Transit Department</p> <p>City of Torrance Community Development Department</p>	

3. Mitigation Monitoring Requirements

**Table 3-1
Mitigation Monitoring Requirements**

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<ul style="list-style-type: none"> Install energy-efficient lighting and lighting control systems in all municipal buildings. (municipal government operations strategy) Require all new traffic lights installed be energy-efficient traffic signals. (municipal government operations strategy) Require all new landscaping irrigation systems installed in the City to be automated, high-efficiency systems to reduce water use, and require use of bubbler irrigation; low-angle, low-flow spray heads; or moisture sensors. (community-wide strategy) Conduct energy-efficiency audits of existing municipal buildings by checking, repairing, and readjusting heating, ventilation, and air conditioning systems; lighting; water heating equipment; insulation; and weatherization. (municipal government operations strategy) 	<p>City of Torrance General Services Department</p> <p>City of Torrance Public Works Department</p> <p>City of Torrance Community Development Department/Public Works Department/Individual Project Contractor</p> <p>City of Torrance Public Works Department</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Prior to individual project approval/Ongoing</p> <p>Ongoing</p>	<p>City of Torrance General Services Department</p> <p>City of Torrance Public Works Department</p> <p>City of Torrance Community Development Department/Public Works Department</p> <p>City of Torrance Public Works Department</p>	
<p>6-2 Pursuant to a goal of overall consistency with the sustainable communities strategies, the City of Torrance shall evaluate new development with the development pattern set forth in the sustainable communities strategies plan or alternative planning strategy, upon adoption of the plan by the Southern California Association of Governments or South Bay Cities Council of Governments.</p>	<p>City of Torrance Community Development Department</p>	<p>Prior to individual project approvals</p>	<p>City of Torrance Community Development Department</p>	

3. Mitigation Monitoring Requirements

**Table 3-1
Mitigation Monitoring Requirements**

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>5.11 NOISE</p> <p>11-1 Prior to the issuance of building permits for any project that involves a noise-sensitive use within the 60 dBA CNEL contour along major roadways, freeways, or railway, the project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features (e.g., setbacks, berms, or sound walls) and/or required building acoustical improvements (e.g., sound transmission class rated windows, doors, and attic baffling), to ensure compliance with the City's Noise Compatibility Guidelines and the California State Building Code and California Noise Insulation Standards (Title 24 of the California Code of Regulations).</p>	<p>City of Torrance Community Development Department/Individual Project Contractor</p>	<p>Prior to individual project approval</p>	<p>City of Torrance Community Development Department</p>	
<p>11-2 Individual projects that involve vibration-intensive construction activities, such as pile drivers, jackhammers, and vibratory rollers, near sensitive receptors shall be evaluated for potential vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceeds the Federal Transit Administration vibration-annoyance criteria of 78 VdB during the daytime), additional requirements, such as use of less-vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., drilled piles to eliminate use of vibration-intensive pile driver).</p>	<p>Individual Project Contractor</p>	<p>Prior to issuance of grading permit(s)</p>	<p>City of Torrance Community Development Department</p>	
<p>11-3 Prior to the issuance of building permits for any project that involves a vibration-sensitive use directly adjacent to a railway, the development project application shall retain an acoustical engineer to evaluate potential for trains to create perceptible levels of vibration indoors. If vibration-related impacts are found, mitigation measures shall be implemented, such as use of concrete, iron, steel, or masonry materials, to ensure that levels of vibration amplification are within acceptable limits to building occupants, pursuant to the Federal Transit Administration vibration-annoyance criteria.</p>	<p>Individual Project Contractor</p>	<p>Prior to issuance of grading permit(s)</p>	<p>City of Torrance Community Development Department</p>	

3. Mitigation Monitoring Requirements

**Table 3-1
Mitigation Monitoring Requirements**

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>11-4 Construction activities associated with new development that occurs near sensitive receptors shall be evaluated for potential noise impacts. Mitigation measures—such as installation of temporary sound barriers for adjacent construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing nonessential idling of construction equipment to no more than five minutes—shall be incorporated into the construction operations to reduce construction-related noise to the extent feasible.</p>	<p>Individual Project Contractor</p>	<p>Prior to individual project construction/During individual project construction</p>	<p>City of Torrance Community Development Department</p>	
<p>5.15 TRANSPORTATION AND CIRCULATION</p> <p>15-1 The General Plan Circulation Element identifies those roadways that are planned to accommodate current development and future growth established by the Land Use Element. The following improvements identified in Table 5.15-8 will be necessary to maintain acceptable levels of service within the anticipated theoretical buildout of the General Plan:</p> <ul style="list-style-type: none"> • Anza Avenue/Sepulveda Boulevard – Widen eastbound Sepulveda Boulevard approach from one left-turn lane, one through lane, and one shared through/right-turn lane to consist of one left-turn lane, two through lanes, and one right-turn lane. • Crenshaw Boulevard/190th Street – Widen the westbound Crenshaw Boulevard approach from two left-turn lanes, two through lanes, and one right-turn lane to consist of two left-turn lanes, three through lanes, and one right-turn lane. • Crenshaw Boulevard/Pacific Coast Highway (SR-1) – Modify the northbound Crenshaw Boulevard traffic signal phasing to include a northbound right-turn overlap, which will preclude movement from westbound to eastbound Pacific Coast Highway (SR-1). • Hawthorne Boulevard (SR-107)/Sepulveda Boulevard – Modify the northbound Hawthorne Boulevard (SR-107) traffic signal phasing to include a northbound right-turn 	<p>City of Torrance Transit/Transportation Department</p>	<p>Ongoing</p>	<p>City of Torrance Community Development Department/ Transit/Transportation Department</p>	

3. Mitigation Monitoring Requirements

**Table 3-1
Mitigation Monitoring Requirements**

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>overlap, which will preclude U-turn movement from westbound to eastbound Sepulveda Boulevard.</p> <ul style="list-style-type: none"> Hawthorne Boulevard (SR-107)/Lomita Boulevard - Modify the westbound Lomita Boulevard traffic signal phasing to include a westbound right-turn overlap, which will preclude U-turn movement from southbound to northbound Hawthorne Boulevard (SR-107). 				

3. Mitigation Monitoring Requirements

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4. Mitigation Monitoring Reports

Mitigation monitoring reports are required to document compliance with the Mitigation Monitoring Program and to dispute arbitration enforcement resolution. Specific reports include:

- Field Check Report
- Implementation Compliance Report
- Arbitration/Enforcement Report

4.1 FIELD CHECK REPORT

Field check reports are required to record in-field compliance and conditions.

4.2 IMPLEMENTATION COMPLIANCE REPORT

The Implementation Compliance Report (ICR) is prepared to document the implementation of mitigation measures on a phased basis, based on the information in Table 3-1. The report summarizes implementation compliance, including mitigation measures, date completed, and monitor's signature.

4.3 ARBITRATION/ENFORCEMENT REPORT

The Arbitration/Enforcement Report (AER) is prepared to document the outcome of arbitration committee review and becomes a portion of the ICR.



4. Mitigation Monitoring Reports

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5. Community Involvement

Monitoring reports are public documents and are available for review by the general public. Discrepancies in monitoring reports can be taken to the arbitration committee by the general public.

5. Community Involvement

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General Plan Frequently Asked Questions

What is a General Plan?

A General Plan is a city's vision for its physical development over a 15 to 20 year timeframe, which is written into a set of goals, objectives and policies for implementing that vision. General Plans are often referred to as a community's "blueprint" for future development. It serves as the comprehensive, long-range plan providing the framework for future physical growth and enhancement and is used for local government decision-making on future development. In California, general plans are required for all cities, even charter cities such as Torrance.

How does the General Plan address requirements of AB 32 and SB 375?

The General Plan addresses the issues of Greenhouse Gas (GHG) emissions and sustainable development throughout the various elements of the Plan, both through policies and objectives and through implementation programs. Because the Attorney General has sued other jurisdictions for inadequately addressing these issues in their General Plans, we have taken special care to ensure that the issues have been addressed in detail. Table CR-3 in the Community Resources element shows where to find issues related to climate change within the General Plan. Section 2.2 of the Land use Element discusses balancing new development and circulation; Sustainable Development is addressed in section 2.3 of the Land use Element; Community Resources Element section 3.2.1 deals with Global Warming and objective CR.14 deals with reduction of our carbon footprint. Implementation programs include 1-25, site design and transportation alternatives; 2-10, trip reduction strategies; 2-13 site design; 3-12, Greenhouse Gas reduction; 3-23 energy conservation; and 3-25 and 26, sustainable development.

Why are we focused on providing housing?

While it may seem semantic, the focus in the Housing Element is on providing the *opportunity* for housing. Provision of adequate housing is a priority for the State, and the Housing Element, which is the only element of the General Plan that must be certified by the State, is one of the main vehicles for insuring that there is ample opportunity for housing. Within the Housing Element, each city must demonstrate that there is the opportunity for housing development sufficient to meet their Regional Housing Needs Assessment (RHNA) numbers in all categories. For a built-out city such as Torrance, what this means is that we must identify a sufficient number of properties within the Housing Element that have the potential to be developed or redeveloped as housing for all income levels in numbers equal or greater than the RHNA requirements for those income levels.

What are RHNA Numbers?

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing law as part of the process of updating the Housing Element of the General Plan. RHNA quantifies the need for housing in each jurisdiction for a specified planning period, looking at both existing need and future need at all income levels. The RHNA numbers are intended to allow communities to anticipate growth so that they may plan appropriately to accommodate that growth in a way that

will maintain the community values while providing opportunities for development of housing across a range of income levels.

Why have we increased the density for medium density residential?

The State considers residential zoning of 30 units and greater per acre as providing the opportunity for housing for low and very low income groups by definition. What this means is that properties zoned as medium density residential with the increased density automatically count as providing housing opportunities for lower income housing, whether or not market forces actually build lower income housing. This helps the City to demonstrate that it has sufficient opportunities to meet its RHNA requirement for the lower income groups, which has traditionally been very difficult for us to do. By increasing the density for medium density residential by 4 units per acre, we are able to show that we are providing the opportunity for medium and lower income housing.

How does the General Plan address RHNA requirements?

The Housing Element has identified a sufficient number of properties to provide the opportunity for housing development throughout the income ranges to satisfy our RHNA requirement and thus meet the requirements for certification by the State. Many of these properties are included in the focus areas proposed for redesignation in the Land Use Element.

Why do we want a Certified Housing Element?

Aside from the fact that it is the law, a Certified housing Element provides the opportunity to apply for grant funding that would otherwise not be available, as well as providing protection against potential lawsuits. There is the risk that, should we be sued for a non-certified Housing Element, the rest of our General Plan would be invalidated as well. One of the potential consequences could include being forced by the courts to accept development that we do not want and over which we no longer have any control. By law, if a jurisdiction adopts an element that does not in compliance the entire General Plan is considered to be invalid and the local government may not proceed to make land use decisions or approve development until such time as it has adopted a valid Housing Element. While the State has not as yet taken a jurisdiction to task for not complying with the Housing Element requirements, they have certainly sued jurisdictions for not complying with requirements of AB 32 and SB 375.

What is the difference between the old General Plan Local Commercial and the new General Commercial and why the change?

The Local Commercial designation was a new designation in the previous General Plan and was meant to stimulate redevelopment of commercial areas particularly adjacent to residential areas. However, the designation was found to be too restrictive and unable to achieve the desired results in that those commercial areas that were given the new designation did not turn over nor did they redevelop or modernize. Based on feedback from property owners, this was largely due to the more restrictive nature of the Local Commercial designation and of the implementing

zoning. With the return to a General Commercial designation, it is hoped that it will be more feasible for some of the older centers to modernize and upgrade.

How much of the Oak Street focus area is changing to residential and why?

The Oak Street focus area is proposed for Medium Density Residential east of Oak Street and north of Jefferson. The majority of this property is already entitled and was re-zoned as part of the Standard-Pacific development that has taken place in the focus area. There are three parcels facing Carson at the northern end of the focus area that are not a part of the Standard Pacific project that would be redesignated as General Commercial. The majority of the focus area is reflecting what is either already in existence or entitled, with the northernmost parcels being seen as more compatible with the residential designation than with the Business Park designation or the General Commercial designation proposed for the parcels facing Crenshaw.

What is the difference between the previous Plan Business Park and the new Plan Residential Office designations?

The Business Park designation was envisioned as a more completely industrial area, while the Residential Office designation will allow for residential live/work units, professional offices and possibly some low impact light industrial uses. It will generally be more compatible with surrounding residential uses and friendlier to smaller businesses than would the Business Park designation. However, it is important to remember that the actual zones, with the exception of an existing residential/professional zone, will need to be developed and applied within the parameters of the overlying General Plan designation. These zones, including definitions, allowable uses and development standards will be brought forward as part of the zoning code revision and will be discussed in depth as the zoning code revision process takes place.

What effect will changing the General Plan designations have on properties that will not conform to the new designation?

The change in the General Plan designation will have no effect on properties; the Municipal Code specifies that the underlying zoning of the parcel is the ruling factor. Until the zoning code is revised, the General Plan designation will be an indicator of the direction that we think the area is moving, but will have no tangible effect. Once the Zoning Code is revised to conform with the General Plan designations, the properties will become legal non-conforming, which will place constraints on the properties such as time limits for properties to return to use in order to maintain their status as legal non-conforming uses if the existing use should be discontinued. In addition, there would be constraints on the rebuilding of such non-conforming uses should the property be damaged. This was a concern discussed by the Planning Commission, with a request that the Zoning Code revision allow for greater time periods for the retention of a non-conforming use and an examination of the codes regarding rebuilding of non-conforming uses.

How were the areas proposed for change chosen?

The areas proposed for change were identified through a series of workshops in which the Commission and public examined the City and agreed on areas that were thought to be stable and

areas that were felt to be in transition or were in need of help. From these exercises, the seven focus areas, comprising less than 2% of the City, were identified and possible uses for the areas were discussed.

How were the new designations in the change areas chosen?

Two to three potential land use designation alternatives were brought forward for each study area and discussed in workshop meetings. The designations proposed were based on examination of surrounding uses and compatibility.

What happens after the General Plan is adopted?

Upon adoption of the General Plan, work will commence on the revision of the Zoning Ordinance, which will contain the implementing zones, definitions and development standards for the new General Plan designations. Some of these zones already exist and will be reexamined for changes while others will need to be created. In addition, other areas of the Zoning Code will be examined, such as the section dealing with legal non-conforming uses, in order to propose changes such as those requested by the Planning Commission allowing greater flexibility for those non-conforming uses should they turn over.

The Zoning Code revisions will also be subject to rigorous public outreach, seeking feedback and consensus as to the best way to implement the changes proposed in the General Plan and any additional changes that may be necessary in the Zoning code.

Palos Verdes Bowl

24600 Crenshaw Blvd., Torrance, CA 90505
Ph. 310.326.5120 Fax 310.539.8021

October 29, 2009

Ms. Laura R. Stetson, AICP, Vice President
Hogle-Ireland
201 South Lake Avenue – Suite #308
Pasadena, CA 91101



Dear Ms. Stetson:

I have attended most of the Torrance General Plan workshops over the last few years. We are located in the Crenshaw/Amsler focus area and own or control over 50% of the property that is under review. We are very excited that this area is being considered for rezoning to General Commercial and Medium-High Density Residential. We agree that the property east of Dormont is perfectly suited for Medium or High density residential development as a transition into General Commercial west of Dormont.

We own the property at Palos Verdes Bowl, 24600 Crenshaw Blvd., Imperial Health Spa, 2433 Moreton Street, and Seven Stones Granite, 2415 Amsler Street. We also control the Church property, 2424 Moreton Street by a first right of refusal through Imperial Health Spa.

Although the current economic climate is not conducive to residential development at this time, the residential zoning will facilitate a much nicer project for the area at a later date. Without this change the area will continue to be quasi-industrial and fall below the standards that this area deserves.

Sincerely,

Handwritten signature of George Brandt.

George Brandt

GGB:dh

cc: Ms. Linda Cessna
Deputy Community Development Director
3031 Torrance Blvd.
Torrance, CA 90505

Joe, Kevin

From: mdgapg@verizon.net
Sent: Thursday, November 05, 2009 7:46 AM
To: CDDGeneralPlan
Cc: Scotto, Frank; Jackson, LeRoy; mdgapg@verizon.net
Subject: Subject for General Plan Update consideration

At the Nov. 10 Public Workshop and Nov. 17 Public Hearing concerning the General Plan Update, please consider the noise and lead pollution emanating from the Redondo Beach Shooting Range on Beryl Street.

We are Torrance residents living near the range who have experienced an increase in usage and noise during our forty years in the area. Of special concern is the location of TUSD's Towers Elementary School and YMCA day care center directly across Beryl Street from the range, where children are present until approximately 6 pm on weekdays and hear the sounds of gunfire during their play. Lead pollution from the range was discovered on the school site last year.

Thank you.

Ann and Marty Gallagher

19404 Linda Drive

310-371-8379