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 Section15091(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 (SO_2), coarse inhalable particulate matter (PM_{10}), 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, PM_{10}, and $PM_{2.5}$; cumulatively contribute to the South Coast Air Basin nonattainment designations for O_3, PM_{10}, 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 O_3 and particulate matter (PM_{10} and $PM_{2.5}$). Emissions of VOC and NO_x are precursors to the formation of O_3. In addition, NO_x is a precursor to the formation of particulate matter (PM_{10} and $PM_{2.5}$). Therefore, the project would cumulatively contribute to the nonattainment designations of the SoCAB for O_3 and particulate matter (PM_{10} 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, PM_{10}, and $PM_{2.5}$ and cumulatively contribute to the South Coast Air Basin nonattainment designations for O_3, PM_{10}, 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 (CO2e) 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 construction-related noise 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, SO_2, PM_{10}, 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 O_3, PM_{10}, 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. As stated above, a more balanced jobs/housing ratio would be achieved with the addition of residential uses.

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, SO_2, PM_{10}, 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 O_3, PM_{10}, 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, PM_{10}, and $PM_{2.5}$. They would also cumulatively contribute to the SoCAB nonattainment designations for O_3, PM_{10}, 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, PM_{10}, and $PM_{2.5}$ and cumulatively contribute to the South Coast Air Basin nonattainment designations for O_3, PM_{10}, 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

The following reference materials were reviewed to obtain information included in or considered during the preparation of the environmental impact report. To arrange for the review of one or more of these references, please contact the agency listed or Ted Semaan, General Plan Manager, at 310-618-5990.

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