SUPPLEMENTAL #1 TO AGENDA ITEM 12A

TO: Members of the Planning Commission

FROM: Planning Division

SUBJECTS: Environmental Assessment, EAS13-00002
Conditional Use Permit, CUP13-00032
Division of Lot, DIV13-00011

LOCATION: 465 Crenshaw Boulevard (APNs 7352-002-909 and 7352-002-910)

Attached is a report prepared by Helix Environmental Planning, the City's biological resources consultant, that respond to biological resource comments submitted during the Environmental Assessment's (EAS13-00002) public review period (Attachment #1).

Secondly, two additional pieces of communication have been submitted after the preparation of the staff report. The first is a letter from the California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, indicating that the City has complied with the State Clearinghouse review requirements for draft environmental review documents pursuant to the California Environmental Quality Act (Attachment #2). The second is a letter citing numerous security related items (Attachment #3). As indicated in the Environmental Assessment and staff report, a security review was completed with the Torrance Police Department and 24-hour security presence will be provided for the site. Staff continues to recommend approval of the request as conditioned.

Prepared by,

Danny Santana
Senior Planning Associate

Respectfully submitted,

Gregg D. Lodan, AICP
Planning Manager

Attachments:
1. Helix Environmental Planning Response to Comments Memorandum
2. California State Clearinghouse Letter
3. Public Correspondence

Memorandum

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HELIX Environmental Planning

Date: January 7, 2015

To: Ted Semaan, City of Torrance

Cc: Danny Santana, City of Torrance

From: Karl Osmundson, HELIX Environmental Planning, Inc.

Subject: Response to Comments on Biological Resources for the Torrance Transit Park and Ride Regional Terminal Project

HELIX Project: RTL-01

Message:

HELIX Environmental Planning, Inc. (HELIX) has prepared this memorandum to serve as response to comments related to biological resources for the Torrance Transit Park and Ride Regional Terminal Project (Project).

California Department of Fish and Wildlife (CDFW)

The following responses are provided with reference to the Project's Initial Study/Mitigated Negative Declaration (MND), Biological Technical Report or Biological Assessment (BA), and Southern Tarplant Mitigation Plan.

Response to Comment 1

This comment provides an introduction and expresses CDFW's understanding of the Project and Project site based on review of the MND, BA, and Southern Tarplant Mitigation Plan. This comment is noted and no response is required.

Response to Comment 2

This comment states CDFW's understanding of the history of development at the site. It references United States Geological Survey (USGS) map information from 1952 and 1954. It also states that the site has restored to a vernal pool complex, as was documented in the area prior to the initial development in the late 1950s.

Attachment 1

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No USGS map information is available from the years 1952 or 1954 that are referenced by the commenter[1],[2]. The commenter alleges a historic vernal pool complex at the site based on USGS map information. USGS map contour lines do not provide sufficient information to determine the presence of a vernal pool complex. There is no evidence that the site historically supported a vernal pool complex. The site is highly disturbed and contains remnants of the previous development that existed for decades. Portions of the site are subject to ponding, but the existing conditions information detailed in the BA demonstrate a vernal pool complex does not occur.

Response to Comment 3

This comment states CDFW's authority as a Trustee and Responsible Agency under CEQA for the Project. This comment is noted and no response is required.

Response to Comment 4

The commenter alleges that the depressions found on the site meet the definition for vernal pools in California, but provides no reference for that definition.

The BA utilized an extensive data set to analyze potential impacts of the Project. Data from multiple years were used in attempt to identify the normal or average condition at the site. Using only data from 2005 as the commenter suggests would not represent the normal condition. Moreover, using data that is approximately 10 years old as the baseline is inconsistent with CEQA, which generally requires that impacts be assessed based upon the current physical conditions of the project site [CEQA Guideline 15125(a)]. The commenter also fails to acknowledge that, in 2005, Los Angeles had its second wettest rainfall season since records began in 1877 and the wettest season in 121 years[3]. Over 37 inches (940 millimeters) of rain were recorded in downtown Los Angeles, marking the highest rainfall year since 1884[4]. Data from such an anomalous year does not represent the normal condition and should not be used as a guide in determining acreages.

The BA included a map depicting plot locations where fairy shrimp sampling occurred. The BA also included narrative identifying the plots in which fairy shrimp cysts were found. Only the common (non-sensitive) versatile fairy shrimp (*Branchinecta lindahli*) were found. The BA

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[1] USGS Map Locator & Downloader (http://store.usgs.gov/b2c_usgs/usgs/maplocator/(ctype=catalogEntry&xcm=r3standardpitrex_prd&carea=%24ROOT&layout=6_1_61_48&uiarea=2)/.do)

[2] Topo map information for Torrance, California (http://www.historicaerials.com/)

[3] National Climatic Data Center, National Oceanic and Atmospheric Association: 2004/2005 Winter Storms in California and the Southwest U.S. (http://www.ncdc.noaa.gov/oa/climate/research/2005/california-storms2005.html)

[4] Los Angeles County Flood of 2005 (http://en.wikipedia.org/wiki/Los_Angeles_County_Flood_of_2005)

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further included a description of the habitat requirements for the versatile fairy shrimp, which is the only fairy shrimp species found at the site.

This fairy shrimp species is known to occur in a variety of unpredictable, small, and short-lived basins, from playas, to arid grassland swale pools, small water-filled gas pockets in old lava flows, and depressions created by weathering of sandstone and quartz monzonite domes[5]. Although the species is recognized as a vernal pool indicator species and is known to occur in association with true vernal pools[6], it is commonly found in non-vernal pools of southern California, including man-made basin and depression features subject to ponding, such as road ruts. The presence of the versatile fairy shrimp alone, in the absence of other vernal pool indicators (e.g., vernal pool flora), is not used in determining whether a basin is a true vernal pool or the boundaries of a particular pool.

The BA included an analysis of the microtopography of the site based on ½-foot contours. The ½-foot contour data was used to determine depressional areas subject to inundation and the surrounding upland drainage or watershed area under normal or average conditions. An upland-to-pool ratio was not calculated because the depressional areas were not considered sensitive vernal pools due to lack of other vernal pool indicator species in addition to the versatile fairy shrimp.

Attachment G of the BA (Appendix B of the HELIX Dry Season Fairy Shrimp Survey and Hatching Report) included an analysis of the depth and surface area of each depressional area on the site. The pH, dissolved oxygen, alkalinity, turbidity, salinity, and average duration that water ponds in each depressional area could not be determined given the time of the study and was not required to analyze potential impacts.

Response to Comment 5

The analyses in the BA and MND are based on the 2014 dry season fairy shrimp survey results. Based on those results, special-status fairy shrimp species were concluded to likely be absent from the site. Only the common versatile fairy shrimp was found to occur. Wet season surveys would be required to complete the U.S. Fish and Wildlife Service (USFWS) protocol survey guidelines. In light of all of the available data, dry season survey results were deemed to be sufficient to analyze the potential for the Project to result in significant impacts to special-status fairy shrimp species in light of CEQA.

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[5] Eriksen, C.H. and D. Belk. 1999. Fairy Shrimps of California's Puddles, Pools, and Playas. Mad River Press. Eureka, California. 196pp.

[6] U.S. Army Corps of Engineers (USACE). 1997. Special Public Notice Regional General Conditions to the Nationwide Permits. November 25.

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Response to Comment 6

This comment points out that the MND states between 350 to 400 southern tarplant individuals will be impacted by the project. It also states that the MND should disclose impacts on the species, including occupied acreage, and proposed mitigation.

The commenter is correct that 350 to 400 southern tarplant individuals are estimated to be impacted by the Project. Impacts to southern tarplant are fully disclosed and adequately addressed in the MND. The commenter is referred to Section 4 on Page 9 of the MND. The commenter is also referred to Attachment 4 of the MND, which includes the Southern Tarplant Mitigation Plan that will be implemented for the Project. This Plan estimates the southern tarplant population at the site extending over five acres in five large (>20-individual) patches. As depicted in Figure 11 of the BA, the large majority of impacted tarplant occurs in association with highly disturbed upland areas dominated by non-native annual grasses and forbs, or bare earth.

The Southern Tarplant Mitigation Plan details the proposed mitigation for the Project impacts to southern tarplant and its habitat. The Southern Tarplant Mitigation Plan proposes the following mitigation goals: (1) relocate the southern tarplant population onsite prior to major impacts from proposed development; (2) maintain future population onsite at a 3:1 ratio, with a goal of roughly 900-1,200 individuals maturing in each of two of five years following project implementation; and (3) permanently set aside and manage an approximately 2-acre portion of the property.

To accomplish the goals stated above, the Southern Tarplant Mitigation Plan proposes the following specific measures: (1) establish an onsite preserve to include at least one seasonal pool, suitable for sustaining a population of southern tarplant; (2) commence site preparation and seeding/planting of the preserve with southern tarplant prior to the start of proposed construction, and implement a five-year management and monitoring period following its creation to allow for experimentation with different approaches to maximize success of southern tarplant germination and survival; (3) introduce additional locally-native vernal pool and grassland species to the preserve, as appropriate; and (4) manage the preserve in perpetuity for the benefit of the southern tarplant and associated vernal pool species.

Response to Comment 7

This comment recommends that surveys be conducted to determine the presence/absence of the spadefoot toad (*Spea hammondii*), a California State species of special concern. It states that suitable habitat occurs on the site. It also states that the site is located 1.0 mile south of Madrona Marsh Preserve, a location where the species had been documented in 2005.

Although it is acknowledged that suitable habitat occurs, the potential for spadefoot toad to occur on the site is extremely low. The site had been developed for decades prior to the year 2000. It is physically separated from the Madrona Marsh Preserve by highly urbanized areas and heavily used roadways. The likelihood that the species would successfully overland disperse from the Madrona Marsh Preserve to the site is very low given the existing

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impediments. The only other plausible way the species could inhabit the site is translocation by human.

In the unlikely event that the species has successfully inhabited the site, it would not be expected to occur in high numbers and the site is not likely to support a substantial population due to the limited amount of available habitat. Potential impacts would be less than significant. In addition, implementation of the Southern Tarplant Mitigation Plan and Mitigation Measures BIO-1 and BIO-4 through BIO-7 would further reduce any potential impact on the species.

Response to Comment 8

This comment provides CDFW's recommendations for mitigating impacts to vernal pool habitat.

As detailed in the BA and stated above, the site is highly disturbed and contains remnants of the previous development that existed for decades. There is no evidence that the site historically supported a vernal pool complex. Portions of the site are subject to ponding, but the existing conditions information detailed in the BA demonstrate that a vernal pool complex does not occur.

Potential significant impacts were identified and mitigation proposed for southern tarplant and its habitat on the site. This includes the areas subject to ponding on the site and the areas that do not pond in normal or average years. As stated above, the Project would establish a 2.0-acre onsite preserve that will include at least one seasonal pool. The preserve will include a buffer around the pool(s) to capture a watershed area and protect against potential impairments to water quality. Establishment and preservation of higher quality seasonal pool habitat that is occupied by southern tarplant and suitable for vernal pool associated species represents adequate mitigation for the Project impacts and a superior condition than what currently exists at the site.

Response to Comment 9

This comment provides CDFW's recommendations for mitigation monitoring.

The recommendations are appreciated and will be considered for incorporation into the City's monitoring effort. As stated above, the Southern Tarplant Mitigation Plan proposes a complete monitoring plan, including maintenance and monitoring requirements over a period of five years. Monitoring will occur throughout the preserve annually for the first five years. An established area within the Madrona Marsh Preserve that already supports the target habitat conditions for the Project's mitigation will be selected for use as a reference site. The reference site will be used to assess and compare annual population fluctuations at both the site and the reference site (e.g., to assess the effects of seasonal rainfall or exceptionally cool spring weather, etc.). Brief comparisons between the two sites will be included in the annual report each year. No irrigation is proposed to be used at the preserve. If the success criteria are not reached, then the CDFW, Friends of Madrona Marsh, and City staff may discuss appropriate adaptive management strategies for the preserve. This is all stated in the Southern Tarplant Mitigation Plan included as Attachment 4 to the MND.

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Response to Comment 10

This comment provides CDFW's recommendations for mitigating impacts to southern tarplant.

The recommendations are appreciated and will be considered for incorporation into the City's mitigation plan components. The Southern Tarplant Mitigation Plan provided in Attachment 4 to the MND details the specific mitigation for impacts to southern tarplant. The Plan was prepared in consultation with CDFW staff, who at the time recommended impacts be compensated at a 3:1 ratio. This 3:1 ratio is included in the Southern Tarplant Mitigation Plan for the Project based on CDFW's previous guidance.

Success criteria proposed for the mitigation effort are detailed in the Southern Tarplant Mitigation Plan. The southern tarplant restoration will be considered successful at the site if the following occur: (1) the population within the preserve reaches 900-1,200 individuals (3:1 existing population estimate) in at least two of the five years of monitoring; (2) the restored southern tarplant are attracting native pollinators; and (3) the population throughout the restoration area does not show a decline in years three through five, unless the population at the reference site exhibits the same pattern and magnitude of decline over those same years. If the success criteria are not reached, then the CDFW, Friends of Madrona Marsh, and City staff may discuss appropriate adaptive management strategies for the preserve.

Response to Comment 11

This comment references the California Fish and Game Code definition for wetlands. It further states that CDFW encourages avoidance and minimization of wetland impacts. Where impacts are unavoidable, it states that the project should include measures to ensure no net loss of wetland habitat values or acreage.

As detailed in the BA and stated above, portions of the site are subject to ponding, but have been demonstrated not to support high value wetland habitat. The areas are dominated by non-native upland vegetation and bare earth. Potential significant impacts were identified and mitigation proposed for southern tarplant and its habitat on the site, which includes the areas subject to ponding in normal or average years. The Project would establish a 2.0-acre onsite preserve that will include at least one seasonal pool. Establishment and preservation of seasonal pool habitat represents adequate mitigation for the Project impacts.

Response to Comment 12

This comment quotes an excerpt from the BA regarding waters of the State and Regional Water Quality Control Board (RWQCB) jurisdiction under the State Porter-Cologne Water Quality Control Act. It recommends consulting with the RWQCB. This comment is noted and no response is required.

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We appreciate the opportunity to provide this supplemental information in response to comments. We would be happy to provide additional information at your request. Should you have any questions, please do not hesitate to contact me at (619) 462-1515 or KarlO@helixepi.com.

Sincerely,

Karl Osmundson
Biology Group Manager/Principal Biologist
HELIX Environmental Planning, Inc.

State of California – Natural Resources Agency
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

January 2, 2015

Mr. Gregg Lodan
City of Torrance
3031 Torrance Blvd.
Torrance, CA 90503
Fax number – 310.781.6902

Subject: Comments on the Draft Initial Study and Mitigated Negative Declaration for the Torrance Regional Transit Center Project, City of Torrance, Los Angeles County (SCH# 2014121003).

Dear Mr. Lodan:

1 The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Initial Study, Mitigated Negative Declaration (MND,), Biological Assessment (BA), and Southern Tarplant Mitigation Plan for the Torrance Regional Transit Center (Project) prepared by the City of Torrance. The proposed Project site is a 15-acre parcel, owned by the City of Torrance, located on the west side of Crenshaw Boulevard and south of West 208th Street in the City of Torrance. The Project includes a 7-acre transit center for the City of Torrance, a 2-acre southern tarplant habitat preserve, future road expansion of W. 208th Street (0.8-acres), as well as the subdivision and future development of two remaining parcels (5.3 acres total). The site currently contains vernal pool habitat as well as a population of southern tarplant (*Centromadia parryi ssp. Australis*), a State Rare designated (California Native Plant Society 1B.1 rank) and supports versatile fairy shrimp (*Branchinecta lindahli*).

2 This proposed site was developed in the late 1950's and the development was completely removed in 2000. Prior to development of the site, United States Geological Survey maps produced in 1952 and 1954 depict a large, shallow depression at the 70' contour; a similar feature currently exists on the proposed site today. The proposed Project site has restored to a vernal pool complex, as was documented in the area prior to the initial development in the late 1950's.

3 The following comments and recommendations have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential project impacts on biological resources.

Biological Analysis

1) Impacts to Vernal Pools - The Department considers the "depressions" found on the Project site to meet the definition for vernal pools in California. The features have an underlying claypan found below the upper 5 feet and clays down to around 10 feet below the surface (Cooper 2014; DiazYourman & Assoc. 2013), are capable of ponding water, supports versatile fairy shrimp (vernal pool associated invertebrate), and southern tarplant (associated with vernal pools and vernally mesic areas). Using a January 19, 2005 Google Earth image, the Department estimates over 7-acres of vernal pool habitat was inundated at the time the photo was taken.

   To fully analyze the impacts related to the vernal pool and its habitat, the following items should be considered including:

   a) Vernal pool ecosystems rely on both flood years and dryer years, the Department recommends using the January 19, 2005 Google Earth imagery that captures the extent of inundation during a wet, non-drought year, as well as the 2005 inundation maps included in the BA as a guide in determining the acreage of the vernal pools.
   b) A map depicting the extent fairy shrimp occupy the site will help delineate the pool boundaries.
   c) To support the vernal pool ecosystem, the upland drainage area to vernal pool ratio should be analyzed and the upland acres necessary to supports the ecosystem set aside and preserved in perpetuity. For instance, a vernal pool is contained within 7 acres. The area that drains towards the vernal pool and supports the existence of the vernal pool is 15 acres. The described vernal pool example would have upland to pool ratio of 1.14 acres. That is, it would take an additional 1.14 acres of uplands to support each acre of pool.
   d) The depth of each pool and the average duration water ponds in each pool.
   e) An assessment of the habitat requirements of the fairy shrimp species found on-site, including the minimum and maximum number of days and depth of ponded water and necessary to complete their lifecycle successfully.
   f) Water quality characteristics of the ponded water including: pH, dissolved oxygen, alkalinity, turbidity and salinity.
   g) A description of the micro-topography and drainage for the current site, including the minimum, maximum and average slope that currently drains the site into the vernal pools.

2) Fairy Shrimp – The BA indicates a dry season fairy shrimp survey was completed in August, 2014 by Jason Kurnow (USFWS Permit TE778195). The BA states "No San Diego fairy shrimp, Riverside fairy shrimp, or any other special-status fairy shrimp species were found during the dry season sampling effort. Special-status fairy shrimp species are currently presumed to be absent from the project site".

a) According to USFWS and D. Christopher Rogers, the expert crustacean taxonomist, whom Project samples were sent to, "These analysis are insufficient by themselves to determine that special status shrimp are absent from the habitat on this site. The results of this survey must be combined with a protocol wet season survey, and concurrence must be sought from the USFWS before any additional determinations can be made" (Helix, 2014).

The Department recommends wet season protocol level surveys be conducted to determine if any special-status fairy shrimp occur on the project site. These results should be included in the MND so an accurate assessment of impacts to biological resources can be made.

3) Southern Tarplant –The MND states between 350 to 400 individuals will be impacted by the Project.

a) Impacts to southern tarplant, including occupied acreage, should be quantified and disclosed in the MND, along with proposed mitigation.

4) Spadefoot Toad. – The Department recommends surveys be conducted to determine the presence/absence of spadefoot toad (*Spea hammondii*) on the Project site. The Project site supports appropriate vernal pool habitat, and is located 1-mile south of Madrona Marsh Preserve, which had documented spade-foot toad in 2005.

Proposed Mitigation

5) Vernal Pool Habitat - The Department recommends avoiding the on-site vernal pool habitat. If this is not feasible, the Department recommends mitigating the loss of this habitat, at a ratio of no less than 1.5 acres of creation for every 1acre of impact. The Department also recommends ensuring a buffer is left around the vernal pools to ensure the volume of water necessary to sustain the pools, and ensure optimal water quality is maintained. The upland drainage area should be no less than the current site's upland drainage area acreage. The site should be designed to at minimum mimic the current site's hydrology, including the minimum and maximum pool depth and duration of ponding, volume of water, and water quality. This is important because fairy shrimp need to be inundated for a certain number of days to complete their life cycle. Additionally, if spade-foot toad is found on the Project site, they have certain hydrology requirements that should be incorporated into the mitigation planning. Supporting fairy shrimp is a function and value the existing vernal pools provide.

6) Mitigation Monitoring –The Department recommends a monitoring plan with quantitative and qualitative success criteria be developed for any vernal pool restoration/creation efforts. A water quality sampling plan should be incorporated into the monitoring plan utilizing the vernal pools at Madrona Marsh as reference sites. The monitoring plan should include elements such as, the depth and duration

water ponds annually compared to the functioning reference pools. The Department recommends monitoring continue until similar functions and values are met comparative to the reference site, generally speaking a minimum of 10 years after installation. The Department also discourages the use of irrigation in sensitive restoration sites as the adverse effects of irrigation, including attracting and supporting Argentine ants, negatively impact the value the mitigation site provides.

7) Southern Tarplant Mitigation – The Department recommends avoiding impacts to southern tarplant. If impacts cannot be avoided, the Department recommends the acreage of habitat occupied by southern tarplant be mitigated at a 1.5-acre ratio for every 1-acre of impact. Additionally, the Department recommends setting quantitative and qualitative success criteria for the estimated 350-400 southern tarplant individuals the MND states will be impacted. The Department recommends a 1.5 ratio of new plants be documented for every 1 plant impacted. It is recommended the success criteria stipulate that the population should be stable, or increasing in number for at least 5 years before the mitigation can be deemed successful. The Department recommends conducting annual surveys with annual reporting to the Department of the progress of any southern tarplant mitigation. The Department is available to assist in developing a mitigation monitoring plan.

Wetland Protection Policy

8) Wetlands Resources - Fish and Game Code states that "wetlands" means lands which may be covered periodically or permanently with shallow water and which include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, fens, and vernal pools. (Fish & Game Code §2785).

The Department, as described in Fish & Game Code § 703(a) is guided by the Fish and Game Commission's policies. The Wetlands Resources policy (http://www.fgc.ca.gov/policy/) of the Fish and Game Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California. Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion which would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."

The Department encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. The Department encourages activities that would avoid or minimize the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, the project should include mitigation

(11)

measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations.

9) Regional Water Quality Control Board – The MND states "With respect to regulatory agency jurisdiction, the basin features on the site that show evidence of more frequent inundation or a consistent surface water area could qualify as isolated wetland and non-wetland waters of the State subject to the regulatory jurisdiction of the RWQCB pursuant to the State Porter-Cologne Water Quality Control Act. Based on the best available data for this study, the two lowest-lying basins (corresponding with Sampling Point 1 and Sampling Point 4) situated below the 70-foot contour represent the only areas on the site that show evidence of more frequent inundation and a consistent surface water area. Wet season aerial imagery provides evidence that these two basins become inundated most frequently and an estimated five of the six years sampled for this study. Based on evidence of more frequent inundation a consistent surface water area during the wet season, these two basins could be considered jurisdictional by the RWQCB as waters of the State, although it should be acknowledged that the basins are clearly man-made and provide no beneficial use and limited functions, value, and services to the site and region. The remaining portions of the site, although occasionally subject to inundation or saturation, should not be considered waters of the State.".

(12)

a) The Department recommends consulting with the RWQCB as it appears the vernal pools on-site may be subject to regulation under the Porter-Cologne Water Quality Control Act.

We appreciate the opportunity to comment on the referenced MND. Questions regarding this letter and further coordination on these issues should be directed to Kelly Schmoker at Kelly.Schmoker@wildlife.ca.gov or (949) 581-1015.

Sincerely,

Betty J Courtney

Betty J. Courtney
Environmental Program Manager I

References:

Cooper, D. 2014. Final Biological Assessment Torrance Regional Transit Center Site.

DiazYourman & Associates, 2013. Geotechnical Report for Torrance Regional Transit Center.

Helix Environmental. 2014. Torrance Regional Transit Center Dry Season Fairy Shrimp Survey and Hatching Report.

Keeler-Wolf, T., D.R. Elam, K. Lewis and S.A. Flint. 1998. California Vernal Pool Assessment Preliminary Report (1998).

ec: CDFW
Ms. Erinn Wilson, Los Alamitos
Ms. Victoria Chau, Los Alamitos
Ms. Sarah Rains, Newbery Park
Mr. Scott Harris, Pasadena

Los Angeles RWQCB
Dana Cole
Valarie Carrillo

U.S. Fish and Wildlife Service
Christine Medak, Carlsbad Office

State Clearinghouse
Scott Morgan

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

December 31, 2014

JAN 05 2015

Gregg D. Lodan
City of Torrance
3031 Torrance Blvd
Torrance, CA 90503

Subject: Torrance Regional Transit Center (RTC) project
SCH#: 2014121003

Dear Gregg D. Lodan:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on December 30, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

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TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Attachment 2

Document Details Report
State Clearinghouse Data Base

SCH# 2014121003
Project Title Torrance Regional Transit Center (RTC) project
Lead Agency Torrance, City of

Type MND Mitigated Negative Declaration

Description The RTC project consists of construction and operation of an approximately 17,800 sf regional transit center facility, of which approximately 3,100 sf would be allocated to ancillary transit oriented food and commercial services. The project also involves a conditional use permit for food and commercial services in the M-2 zone and the subdivision of two existing parcels into four parcels on an existing 15.06 acre site located in the M-2 Zone at the 465 Crenshaw Boulevard (APNs 7352-002-909 and 7352-002-910). A MND has been prepared pursuant to CEQA Guideline Section 15074.

Lead Agency Contact

Name Gregg D. Lodan
Agency City of Torrance
Phone 213-618-5990 **Fax**
email
Address 3031 Torrance Blvd
City Torrance **State** CA **Zip** 90503

Project Location

County Los Angeles
City Torrance
Region
Lat / Long 33° 50' 31.9" N / 118° 19' 46.3" W
Cross Streets Crenshaw Blvd/208th Street
Parcel No. 7352-002-909, 7352-002-910
Township **Range** **Section** **Base**

Proximity to:

Highways I-405
Airports
Railways AT&SF RY Co.
Waterways
Schools TUSD, Ambassador Hi.
Land Use Vacant former industrial Site/M-2 (Heavy Manufacturing District) Zone/Heavy Manufacturing General Plan Designation

Project Issues Air Quality; Biological Resources; Noise; Public Services; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Supply; Wetland/Riparian; Landuse

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission

Date Received 12/01/2014 **Start of Review** 12/01/2014 **End of Review** 12/30/2014

To: Greg D. Lodan, AICP
RE: RTC Project

12-31-14

JAN 05 2015

—On a strictly NEED TO KNOW ONLY BASIS—

- Did the CEQA Study include the miscreants frequenting, fostered + hidden by the sound walls + overpass?
- Have the Dept. of Homeland Security + those in the TPD who have the most experience dealing with it since 9-11 been included? — Namely Lt. Martin Vukotic, + others he may name, re Taggers, druggies, mildly wacky teens, gangs, potential +/or real terrorists (foreign +/or domestic, + any Lone Wolf?
- San Diego Congressman Duncan Hunter, KOGO-600 AM News, Weds. 10-8-14, 3PM = "... Border Patrol has caught some ISIS fighters trying to cross into our country. ... How many have succeeded?" (Looking for 'soft' targets, preferably hidden, with adjacent parking, etc.?)
- Has the rr route + 'cargo' been delineated + extrapolated re targets, from local to a possible nationally disabling cluster?
- Strengthening airport security is wise. Increasing our rr exposure exponentially seems antithetical to security (through prevention + foresight). Surely our rr is equally or more important than the Torrance airport.
- I accede my vote into Lt. Vukotic's capable hands + have total confidence in his good judgement + experience.

Thank you for your consideration.

E. M. Pagan
623 Pine Dr
Torrance, CA 90501

CC: Lt. Martin Vukotic, TPD
Mayor Patrick J. Furey
LeRoy Jackson, City Mgr.
Ofr. Scott Norris, TPD

Attachment 3