

DRAFT ENVIRONMENTAL IMPACT REPORT

Prologis Del Amo and Prairie Center Project

Prepared for
City of Torrance

Submitted by



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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ACM	Asbestos-Containing Materials
ACR	American Carbon Registry
ADT	Average Daily Traffic
ANSI	American National Standards Institute
AQMP	Air Quality Management Plan
BAU	Business-as-Usual
BCE	Before Common Era
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CALFIRE	California Department of Forestry and Fire Protection
CAO	Cleanup and Abatement Orders
CAP	Climate Action Plan
CAR	Climate Action Reserve
CARB	California Air Resources Board
CBC	California Building Code
CBECS	Commercial Buildings Energy Consumption Survey
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFGF	California Fish and Game Code
CFR	Code of Federal Regulations
CH ₄	Methane
CHP	California Highway Patrol
CLRRRA	California Land Reuse and Revitalization Act
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
DEIR	Draft Environmental Impact Report
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EEG	Environmental Engineering Group
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right to Know Act
ESA	Environmental Site Assessment
ESS	Ex-Situ Solidification
EV	Electric Vehicle

EVCS	Electric Vehicle Charging Station
EVSE	Electric Vehicle Supply Equipment
EWMP	Enhanced Watershed Management Program
FAR	Floor Area Ratio
FEIR	Final Environmental Impact Report
FHP	Free Hydrocarbon Product
FHSA	Federal Hazardous Substances Act
FHSZ	Fire Hazard Severity Zones
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FTA	Federal Transit Administration
GHG	Greenhouse Gas
GLA	Glenn Lukos Associates
GWP	Global Warming Potential
HHWE	Household Hazardous Waste Element
HI	Heavy Industrial
HMBP	Hazardous Materials Business Plan
HMTA	Hazardous Materials Transportation Act
HRA	health risk assessment
HSWA	Hazardous and Solid Waste Amendments Act
HWSA	Hazardous and Solid Waste Amendments
I-HVY	Heavy Industrial
IJMR	International Journal of Multidisciplinary Research
IPCC	Intergovernmental Panel on Climate Change
ISO	International Organization for Standardization
ISS	In-Situ Solidification
ITE	Institute of Transportation Engineers
ITP	Incidental Take Permit
IWMA	Integrated Waste Management Act
LA	Los Angeles
LACFCD	Los Angeles County Flood Control District
LARWQCB	Los Angeles Regional Water Quality Control Board
LAWA	Los Angeles World Airports
LBP	Lead-Based Paint
LID	Low Impact Development
LNAPL	Light Non-Aqueous Phase Liquid
M-2	Heavy Manufacturing District
MBTA	Migratory Bird Treaty Act
MEIR	Maximally Exposed Individual Receptor
MLD	Most Likely Descendant(s)
MM	Mitigation Measures
MMRP	Mitigation Monitoring and Reporting Program
MRZ	Mineral Resource Zone
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NF ₃	nitrogen trifluoride
NHTSA	National Highway Traffic Safety Administration
NO	Nitric Oxide

NO ₂	Nitrogen Dioxide
NOA	Naturally Occurring Asbestos
NOC	Notice of Completion
NOP	Notice of Preparation
NOx	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWPR	Navigable Waters Protection Rule
OHWM	Ordinary High Water Mark
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCE	Passenger Car Equivalent
PERP	Portable Equipment Registration Program
PHMSA	Pipeline and Hazardous Materials Safety Administration
PM	Particulate Matter
PM ₁₀	Particulate Matter
PM _{2.5}	Fine Particulate Matter
PPV	Peak Particle Velocity
PRC	Public Resources Code
PRPA	Paleontological Resources Preservation Act
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
REMEL	Reference Energy Mean Emission Level
RMP	Risk Management Plan
ROG	Reactive Organic Gases
ROW	Right-Of-Way
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAA	Streambed Alteration Agreement
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SBCCOG	South Bay Cities Council of Governments
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SLF	Sacred Lands File
SMP	Soil Management Plan
SO ₂	sulfur dioxide
SR-107	California State Route 107
SR-213	California State Route 213
SRA	State Responsibility Area
STLC	Soluble Threshold Limit Concentration
SUSMP	Standard Urban Stormwater Mitigation Plan

SWMP	Stormwater Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCLP	Toxicity Characteristic Leaching Procedure
TCR	Tribal Cultural Resource
TMC	Torrance Municipal Code
TPH	Total Petroleum Hydrocarbons
TRC	Torrance Refinery Company LLC
TRU	Transport Refrigeration Unit
TSCA	Toxic Substances Control Act
US	United States
USACE	U.S. Army Corps of Engineers
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WAIRE	Warehouse Actions and Investments to Reduce Emissions
WHO	World Health Organization

EXECUTIVE SUMMARY

ES.1. Introduction/Background

This Draft Environmental Impact Report (DEIR) addresses the environmental effects associated with the implementation of the proposed Prologis Del Amo and Prairie Center Project (proposed Project, Project). The California Environmental Quality Act (CEQA) requires that local government agencies consider the environmental consequences before taking action on projects over which they have discretionary approval authority. An environmental impact report (EIR) analyzes potential environmental consequences in order to inform the public and support informed decisions by local and state governmental agency decision makers. This document focuses on impacts determined to be potentially significant in the Notice of Preparation (NOP) completed for this project (see Appendix A).

This DEIR has been prepared pursuant to the requirements of CEQA and the City of Torrance's CEQA local procedures. As the lead agency, the City of Torrance has reviewed and directed the revisions of all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on City technical personnel from other departments and review of all technical subconsultant reports.

Data for this DEIR derive from onsite field observations, discussions with affected agencies, analysis of adopted plans and policies, review of available studies, reports, data and similar literature, and specialized environmental assessments (see Appendices C through Q).

ES.2. Proposed Project Description

The proposed Prologis Del Amo and Prairie Center Project would develop a 403,033 sf speculative, Class A warehouse building, including 15,000 sf of office on 31.3 acres of vacant land. The Project would be located at the northeast intersection of Del Amo Boulevard and Prairie Avenue/Madrona Avenue. The proposed building would include 56 dock doors on the northeastern portion of the building. On an additional 7.79 acres within roads adjacent to the Project site, road improvements would be made. The Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. With cold storage, the Project would likely include rooftop ventilation systems, or air conditioning units on the buildings. Prior to construction, a Soil Management Plan and Response Plan would be implemented, with oversight by the LARWQCB.

ES.3. Project Objectives

The underlying purpose of the Project is to develop the site with an industrial building that will implement the Torrance General Plan, create opportunities for employment within the City, and serve the local market demand for industrial building space. The following is a list of specific objectives that the proposed Project is intended to achieve.

- A. Develop an industrial project on the Project site in conformance with the applicable goals, objectives, and policies of the Torrance General Plan that is compatible with adjoining land uses;
- B. Efficiently develop an underutilized property with industrial uses in proximity to regional highways (I-405 and I-110) to help meet regional demands for goods movement facilities;
- C. Expand economic development and facilitate job creation in the City of Torrance by establishing new industrial development adjacent to or near already-established industrial uses;
- D. Maximize new job opportunities within the City of Torrance which improves the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances;

- E. Maximize opportunities for positive economic benefit to the City, including new sales and property tax revenues that can be used for City services;
- F. Develop a Class A, speculative industrial building in Torrance that is designed to meet contemporary industry standards, can accommodate a wide variety of users, and is economically competitive with similar industrial buildings in the local area and region;
- G. Redevelop a property that has access to available infrastructure, including roads and utilities;
- H. Provide a landscaping plan that features drought-tolerant plant materials to provide for an aesthetically pleasing outdoor environment while minimizing the demand for water resources.

ES.4. Purpose and Scope of the EIR

This DEIR has been prepared as a “Project EIR,” defined by Section 15161 of the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3). A project EIR examines the environmental impacts of a specific development project and should focus primarily on the changes in the environment that would result from the development project. The EIR examines all phases of the project including planning, construction, and operation.

During a preliminary analysis, the NOP identified 11 issue areas whose effects were found not to be significant, or less than significant. These issue areas were not analyzed in detail in the EIR, and are described in Section 6.3, Effects Not Found to be Significant.

This DEIR has been prepared pursuant to CEQA to assess the environmental effects associated with implementation of the proposed project, as well as anticipated future discretionary actions and approvals. CEQA established six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis and full disclosure of the environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

An EIR is a decision-making tool used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed project, the lead agency must consider the information in the EIR; determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines; determine that it reflects the independent judgment of the lead agency; adopt findings concerning the project’s significant environmental impacts and alternatives; and adopt a statement of overriding considerations if significant impacts cannot be avoided.

ES.5. Environmental Impacts and Mitigation Measures

Section ES.12 (Summary of Impacts) lists the identified environmental impacts and recommended mitigation measures for the Project. Detailed descriptions of impacts of proposed Project are provided in Section 4, along with a discussion of cumulative impacts. The impact analysis in the EIR was prepared by

topic area and presents an assessment of the identified direct and indirect impacts and discloses the level of significance for each impact. The analysis also identifies mitigation measures to reduce or avoid significant impacts of the proposed Project and the alternatives.

A significant impact is defined under CEQA as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project” (CEQA Guidelines Section 15382). The categories of potential effects are provided below.

Direct Effects	Effects caused by the proposed Project that occur at the same time and place as the proposed Project
Indirect Effects	Effects caused by the proposed Project that occur later in time, or further in distance, but are still reasonably foreseeable
Residual Impacts	Impacts that still meet or exceed significance criteria after application of mitigation and, therefore, remain significant
Cumulative Impacts	Impacts resulting from the proposed Project when combined with similar effects of other past, present, and reasonably foreseeable future projects, regardless of which agency or person undertakes such projects (cumulative impacts could result from individually insignificant but collectively significant actions taking place over time)
Short-Term Impacts	Impacts expected to occur during construction or decommissioning that do not have lingering effects for an extended period after the activity is completed
Long-Term Impacts	Impacts that would persist for an extended period of time

The significance of each impact is determined based on an analysis of the impact, compliance with any recommended mitigation measure, and the level of impact remaining compared to the applicable significance criteria relevant to a particular resource. Impacts are classified as one of the five categories listed below.

Significant and Unavoidable	A substantial or potentially substantial adverse change from the environmental baseline that meets or exceeds significance criteria, where either no feasible mitigation can be implemented, or the impact remains significant after implementation of mitigation measures
Less Than Significant with Mitigation	A substantial or potentially substantial adverse change from the environmental baseline that can be avoided or reduced to below applicable significance thresholds
Less than Significant	An adverse impact that does not meet or exceed the significance criteria of a particular environmental issue area and, therefore, does not require mitigation
Beneficial	An impact that would result in an improvement to the physical environment relative to baseline conditions
No Impact	A change associated with the Project that would not result in an impact to the physical environment relative to baseline conditions

Based on the analysis in EIR Chapter 4, the EIR has not identified any significant and unavoidable impacts of the proposed Project.

The EIR has determined that all other potential direct, indirect, and cumulative environmental impacts of the proposed Project would be ***less than significant*** or ***less than significant with the implementation of mitigation measures***. These impacts are described in detail in Section 4 of the Draft EIR.

ES.6. Cumulative Scenario and Impacts

ES.6.1. Cumulative Projects

Under CEQA, “a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts” (CEQA Guidelines Section 15130(a)(1)). Cumulative impacts can result from “individually minor but collectively significant projects taking place over a period of time” (CEQA Guidelines Section 15355). An EIR must discuss cumulative impacts if the incremental effect of a project, combined with the effects of other projects is “cumulatively considerable” (CEQA Guidelines Section 15130(a)). Such incremental effects are to be “viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects” (CEQA Guidelines Section 15164(b)(1)). Together, these projects comprise the cumulative scenario for the cumulative analysis. Table 3-1, Cumulative Projects in the Project Vicinity, in Chapter 3 shows 15 cumulative projects, all of which are in an approximately 2-mile radius of the proposed Project.

ES.6.2. Cumulative Impacts of the Proposed Project and Alternatives

ES.6.2.1. Proposed Project

A detailed analysis of the cumulative effects of the proposed Project is presented in each issue area section of EIR Chapter 4, including a discussion for each of the 9 disciplines. Each environmental issue area has determined that the proposed Project’s contribution to cumulative impacts would not be cumulatively considerable, and therefore cumulative impacts would be less than significant with implementation of mitigation measures, as described in EIR Chapter 4.

ES.6.2.2. Alternatives

All of the retained alternatives would involve similar types of construction activities as the proposed Project (aside from the No Project/No Development Alternative), but they would all be in the general geographic area of the proposed Project.

The same list of cumulative projects that could potentially combine with the proposed Project to result in a cumulative adverse effect (see Table 3-1 and Figure 3-1, Cumulative Projects) would also apply to all of the retained alternatives. Therefore, the cumulative analysis presented in each section for the proposed Project would also apply to all of the alternatives, and the adverse cumulative effects that are described for the proposed Project would also occur with all of the alternatives.

ES.7. Alternatives to the Proposed Project

CEQA requires that a DEIR include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6). The following three project alternatives were identified and analyzed for relative impacts as compared to the proposed project:

- No Project/No Development Alternative
- Existing Zoning – Professional Office Use Alternative
- Manufacturing Use Alternative

The following presents a summary of the alternatives analyzed in the DEIR. These alternatives were evaluated to provide a reasonable range of feasible alternatives capable of attaining most project objectives and reducing potential environmental impacts. Please refer to Chapter 5 of this DEIR for a complete discussion of each of the alternatives and their associated impacts.

ES.7.1. No Project/No Development Alternative

Section 15126.6(e) of the CEQA Guidelines requires that the No Project Alternative be considered to allow decision makers to compare the impacts of approving the proposed Project against the impacts of not approving the proposed Project. CEQA requires a discussion of what would be reasonably expected to occur in the foreseeable future if the Project were not approved. This alternative would leave the Project site in its existing conditions, as described in Section 2, Project Description.

The No Project/No Development Alternative assumes that no development or improvements would occur on the Project site and the entire 31.3-acre site would remain vacant. Under this alternative, the warehouse building would not be developed and none of the Project's internal parking, utility, and other infrastructure improvements would occur. Remediation would still occur under this alternative under the oversight of LARWQCB in accordance with the provisions of the California Land Reuse and Revitalization Act (CLRRRA) of 2004 under an approved Response Plan and Soil Management Plan.

ES.7.2. Existing Zoning – Professional Office Use Alternative

The Existing Zoning – Professional Office Alternative would consider the development of the Project site with a use that is different from the industrial use under the proposed Project but that still conforms to the existing zoning standards, specifically the Heavy Manufacturing District (M-2 Zone) which in addition to industrial uses, also allows businesses and professional office uses.¹ Under this alternative, a total of approximately 350,000 sf of professional office uses and 1,050 parking spaces would be constructed.² The alternative would consider the development of one or more professional office buildings at the Project site, which would contain individual office suites occupied by a range of professional tenants. The remaining areas of the Project site would be developed with parking areas, drive aisles, driveway(s), lighting, utility connections, stormwater treatment and conveyance facilities, and landscaped areas. Under the Existing Zoning – Professional Office Alternative, vehicular access to the site would be similar to the proposed Project. A 350,000 sf professional office building would generate 3,794 daily trips,³ resulting in an increase of 1,370 daily trips compared to the Project.

ES.7.3. Manufacturing Use Alternative

The Manufacturing Use Alternative would consider the development of the Project site with a 403,033 sf industrial building for manufacturing uses only (whereas the proposed Project specifically includes storage and distribution uses, particularly warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage, to support the goods movement industry). Under this alternative, access to the site would be the same as the Project. Assuming all manufacturing uses for the proposed building, the

¹ The M-2 Zone is intended for businesses engaged in heavier industrial activities than those permitted in the M-1 (Light Manufacturing) Zone. However, offices are a permitted land use within the M-2 Zone pursuant to the City's Municipal Code Section 91.31.1 (c) with a conditional use permit.

² The square footage has been reduced from the Project to account for additional parking spaces that are required (approximately 604 parking spaces) per City of Torrance Municipal Code Section 93.2.6: three (3) parking spaces (8.5 x 19 feet) for each one thousand (1,000) square feet of floor area for each office in which no activity is carried on catering to retail trade with the public and no stock of goods. Such business shall include but not be limited to offices for psychologists, attorneys, architects, accountants, managers and administrators.

³ Calculations are based on Trip Generation from the 11th Edition, Institute of Transportation Engineers (ITE), Office (Code 710).

Manufacturing Use Alternative would generate approximately 1,914 daily trips resulting in a decrease of 510 daily trips compared to the Project.⁴

ES.8. Alternatives Eliminated from Further Consideration

In addition to the alternatives evaluated in the EIR, alternatives were considered and eliminated by a screening process. Reasons for elimination include (a) inability to meet most basic Project objectives, (b) infeasibility due to economic, environmental, legal, social, technological, or regulatory reasons, or (c) inability to reduce overall environmental impacts in comparison to the proposed Project. These alternatives include alternative sites and alternative site plans. Each potential alternative and the rationale for elimination are described in EIR Section 5.3.

ES.9. Summary Comparison of Proposed Project and Alternatives

Table ES-1 compares the potential impacts of the proposed Project to the alternatives, and identifies if the Alternative would have the potential to meet most Project objectives. While all of the Alternatives would have the same impact conclusions as the proposed Project in terms of level of significance and the need for mitigation, the degree of impacts compared to the proposed Project would vary in some instances as shown below. Table ES-1 summarizes the conclusions in Section 5, Alternatives Analysis.

Table ES-1. Comparison of Alternatives to the Proposed Project

Environmental Resource	Alternative 1: No Project/No Development Alternative	Alternative 2: Existing Zoning – Professional Office Alternative	Alternative 3: Manufacturing Use Alternative
Air Quality	Fewer	Greater	Fewer
Biological Resources	Fewer	Similar	Similar
Cultural Resources	Similar	Similar	Similar
Greenhouse Gas Emissions	Fewer	Greater	Fewer
Geology, Soils, and Paleontological Resources	Fewer	Similar	Similar
Hazards and Hazardous Materials	Fewer	Similar	Similar
Noise	Fewer	Fewer	Similar
Transportation	Fewer	Greater	Fewer
Tribal Cultural Resources	Similar	Similar	Similar
Potential to Meet Most Project Objectives?	NO	YES	YES

1 “Fewer” indicates that the alternative would create reduced or fewer impacts than the proposed Project would create. “Similar” indicates that impacts would be similar to those of the proposed Project. “Greater” indicates that the alternative would result in a greater level of impact than would the proposed Project.

2 Section 5.4 discusses to what extent the alternatives meet the Project objectives.

ES.10. Environmentally Superior Alternative

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where, as here, the “No Project” Alternative is environmentally superior to the proposed Project, the environmentally superior development alternative must be identified. Alternative 3, the Manufacturing Use Alternative, has been identified as the environmentally superior alternative. As shown in Table 5-1, this alternative would lessen environmental impacts in the areas of Air Quality, Greenhouse Gas Emissions, and Transportation. The alternative would be required to implement all mitigation measures identified for the proposed Project in order to ensure that impacts would remain less than significant. This

⁴ Calculations are based on Trip Generation from the 11th Edition, Institute of Transportation Engineers (ITE), Code 140.

alternative would have similar impacts in the areas of Biological Resources; Cultural Resources; Geology, Soils, and Paleontological Resources; Hazards and Hazardous Materials; Noise; and Tribal Cultural Resources.

Although Alternative 3 would be environmentally superior to the proposed Project, it would not reduce or eliminate significant impacts from the proposed Project, because there are no significant impacts from the proposed Project. Alternative 3 would also not reduce the need for mitigation measures, since impacts would not be reduced to levels that are less than significant without mitigation.

Similar to the proposed Project, Alternative 3 would not require mitigation measures for Air Quality, because operation emissions associated with the alternative would not exceed the SCAQMD regional threshold. Additionally, TRU source emissions would be eliminated, further reducing the operational emissions. Therefore, impacts to Air Quality would be less than the proposed Project and no mitigation measures would be required.

Similarly, emissions would be reduced for GHGs compared to the proposed Project; however, operational emissions would exceed the SCAQMDs regional thresholds, and would require mitigation for impacts to be less than significant.

Transportation impacts would be reduced under Alternative 3, due to a decrease of 510 daily trips compared to the Project, however, mitigation measures would still be required to ensure the impacts would be less than significant.

Due to the proposed use of the Project in Alternative 3, as a manufacturing only facility, this alternative would narrow the scope of the use of the Project, and reduce the extent to which Project objectives are attained.

A manufacturing-only facility may be harder to find tenants for, since manufacturing is generally very specialized, which may require more specialized building features than a goods movement facility. Generally, goods movement is more in-demand than manufacturing in Southern California, given the region's role as a major hub for international trade and e-commerce, with the Port of Los Angeles and Port of Long Beach located approximately 5 miles southeast of the City. Due to this, there may be more difficulty finding a tenant that would have their manufacturing needs met by the development.

Additionally, this alternative would not help regional demands for goods movement facilities (Objective B). This alternative would limit jobs to the manufacturing sector, and would limit the variety of uses that could be implemented for the Project (Objectives D and F).

ES.11. Known Areas of Controversy or Unresolved Issues

Pursuant to State CEQA Guidelines Section 15123, this EIR acknowledges the areas of controversy and issues to be resolved that are known to the City or that were raised during the scoping process. This DEIR addresses environmental issues that are known or were raised by agencies or interested parties during the Notice of Preparation (NOP) public scoping process. All of the NOP comments letters are provided in Appendix B of this DEIR.

The following environmental topics of potential controversy were identified during the scoping meetings and/or NOP process:

- Although the logistics industry is an important component of the economy, warehouses can result in environmental impacts, including those related to air quality and health, noise, and transportation.
- Land use conflicts between warehouses and sensitive receptors must be avoided, or the impacts of any unavoidable conflicts must be mitigated.
- Potential adverse air quality and greenhouse gas impacts and air pollutant sources from the proposed Project must be identified.

- Measures to reduce emissions associated with the Project to help the State meet air quality goals must be considered.
- Potentially adverse public health impacts from diesel particulate matter (DPM) associated with warehouse operations within close proximity of sensitive land uses is a concern. The potential health risk impacts to these receptors and mitigation measures that would reduce or eliminate DPM risks must be evaluated.

The major issues to be resolved by the City, as the Lead Agency for the proposed Project, include the following:

- The adoption or modification of recommended mitigation measures.
- The consideration of additional mitigation measures that could be applied to the proposed Project.
- The approval of the proposed Project or an alternative.

ES.12. Summary of Impacts

Table ES-2, Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation, summarizes the conclusions of the environmental analysis contained in the DEIR. Impacts are identified as significant or less than significant, and mitigation measures are identified for all significant impacts.

Table ES-2. Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures
Impact AQ-1: Conflict with or obstruct implementation of an applicable air quality plan.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact AQ-3: Expose sensitive receptors to substantial pollutant concentrations.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact BIO-1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	
Construction – Less Than Significant with Mitigation	MM-BIO-1a: Mitigation for Southern Tarplant MM-BIO-1b: Protection and Avoidance Surveys for Nesting Birds MM-BIO-1c: Protection and Avoidance Surveys for Crotch's Bumble Bees MM-BIO-1d: Protection and Avoidance Surveys for Burrowing Owls MM-BIO-1g: Mitigation for Legless Lizards

Impacts	Mitigation Measures
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact BIO-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact BIO-3: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	
Construction – Less Than Significant with Mitigation	MM-BIO-1b: Protection and Avoidance Surveys for Nesting Birds
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact CR-1: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5	
Construction – Less Than Significant with Mitigation	CR-1: Inadvertent Discovery of Cultural Resources
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact CR-2: Cause a substantial adverse change in the significance of unique archaeological resources or archaeological resources as defined in State CEQA Guidelines Section 15064.5.	
Construction – Less Than Significant with Mitigation	CR-1: Inadvertent Discovery of Cultural Resources
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact CR-3: Disturb human remains, including those interred outside of formal cemeteries.	
Construction – Less Than Significant with Mitigation	CR-3: Inadvertent Discovery of Human Remains
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact GHG-1: Conflict with or obstruct implementation of an applicable air quality plan.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant with Mitigation	GHG-1a Reduce Vehicle Idling GHG-1b Provide Documentation for Clean Engine Incentives GHG-1c Provide EV Charging Stations GHG-1d Electrify Truck and Dock Bays GHG-1e Use Zero-Emission On-Site Equipment GHG-1f Reduce GHG Emissions or Surrender Offset Credits

Impacts	Mitigation Measures
Impact GHG-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant with Mitigation	GHG-1a Reduce Vehicle Idling GHG-1b Provide Documentation for Clean Engine Incentives GHG-1c Provide EV Charging Stations GHG-1d Electrify Truck and Dock Bays GHG-1e Use Zero-Emission On-Site Equipment GHG-1f Reduce GHG Emissions or Surrender Offset Credits
Impact GEO-1: Directly or indirectly cause potential substantial adverse effects due to rupture of a known earthquake fault, seismic ground shaking, or liquefaction.	
Construction – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Operations & Maintenance – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Impact GEO-2: Result in substantial erosion or loss of topsoil.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact GEO-3: Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off- site landslide, lateral spreading, subsidence, liquefaction, or collapse.	
Construction – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Operations & Maintenance – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Impact GEO-4: Be located on expansive soil, creating substantial direct or indirect risks to life and property.	
Construction – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Operations & Maintenance – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Impact GEO-5: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	
Construction – Less Than Significant with Mitigation	GEO-5: Monitor Ground-Disturbing Activities
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact HAZ-1: Create a risk to the public or the environment from the routine use, transport, storage, and disposal of hazardous materials.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact HAZ-2: Create a risk to human health and the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.

Impacts	Mitigation Measures
Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact HAZ-4: Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact HAZ-5: Impair or interfere with an adopted emergency response plan or emergency evacuation plan.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact HAZ-6: Expose people or structures to a significant risk of loss, injury, or death from wildland fires.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact NOI-1: Expose persons to or generate temporary or permanent noise levels in excess of established standards.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact NOI-2: Expose persons to or generate excessive groundborne vibration.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact TRA-2: Conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b) regarding vehicle miles traveled.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact TRA-3: Substantially increase hazards due to a geometric design feature or incompatible uses.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact TRA-4: Result in inadequate emergency access.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact TCR-1: Cause a substantial adverse change in the significance of a Tribal Cultural Resource.	
Construction – Less Than Significant with Mitigation	TCR-1a: Retention of Tribal Monitor TCR-1b: Unanticipated Discovery of a Tribal Cultural Resource

Impacts	Mitigation Measures
	TCR-1c: Unanticipated Discovery of Human Remains and Grave Goods TCR-1d: MLD Recommendations for Unanticipated Discovery of Human Remains and Grave Goods
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact TCR-2: Cause a substantial adverse change in the significance of a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, and that is a Tribal Cultural Resource identified by a California Native American tribe.	
Construction – Less Than Significant with Mitigation	TCR-1a: Retention of Tribal Monitor TCR-1b: Unanticipated Discovery of a Tribal Cultural Resource TCR-1c: Unanticipated Discovery of Human Remains and Grave Goods TCR-1d: MLD Recommendations for Unanticipated Discovery of Human Remains and Grave Goods
Operations & Maintenance – No Impact	No mitigation measures are required.

1. INTRODUCTION

1.1. Purpose of the Environmental Impact Report

This EIR is an informational disclosure document for the City of Torrance, responsible agencies, and other interested parties. According to Section 15121(a) of the State CEQA Guidelines:

“[An EIR] will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.”

Section 15151 of the State CEQA Guidelines provides the following standards for EIR adequacy:

“An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection; but for adequacy, completeness, and a good faith effort at full disclosure.”

This EIR has been distributed for review to responsible agencies, trustee agencies with resources affected by the Project, and other interested agencies and individuals. The City will consider the Draft EIR, comments received on the Draft EIR, responses to those comments, and any changes to the Draft EIR, before deciding whether to certify the Final EIR as complying with CEQA and taking action on the proposed Project.

Comments on the Draft EIR should focus on the adequacy of the document in identifying and analyzing the potential environmental effects, determination of significance, and effectiveness of mitigation measures.

1.2. Project Overview

1.2.1. Project Applicant

Prologis L.P. (Prologis) is the project Applicant for the proposed Project, and will develop the site with an industrial building that would allow for warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. Prologis is a global company, that owns, develops, operates, and manages logistics real estate, including warehouses and distribution centers.

1.2.2. Summary of Proposed Project

The proposed Prologis Del Amo and Prairie Center Project would develop a 403,033 sf speculative, Class A warehouse building, including 15,000 sf of office on 31.3 acres of vacant land. The Project would be located at the northeast intersection of Del Amo Boulevard and Prairie Avenue/Madrona Avenue. The proposed building would include 56 dock doors on the northeastern portion of the building. On an additional 7.79 acres within roads adjacent to the Project site, road improvements would be made. The Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. With cold storage, the Project would likely include rooftop ventilation systems, or air conditioning units on the buildings. Prior to construction, a Response Plan and Soil Management Plan would be implemented, with oversight by the LARWQCB (SCS Engineers, 2025a and 2025b).

1.2.3. Land Ownership and Right-of-Way Requirements

The Project would be located on a 31.3-acre parcel of land owned by Torrance Black Beauty, LLC. Additionally, there would be 7.79 acres of offsite disturbance for installation of sewer infrastructure to serve the Project, and anticipated future road improvements, which would be within city streets.

1.3. Native American Consultation under Assembly Bill 52

Government-to-government tribal consultation was conducted between the City and representatives of Native American tribes identified by the NAHC. Letters including information about the proposed Project, location map, and an invitation to consult regarding the proposed Project were mailed via United States Postal Service certified mail on November 30, 2022. Letters were sent to the following tribes:

- | | | |
|---|------------------------------|---------------------------------------|
| ■ Gabrieliño Band of Mission Indians – Kizh Nation | ■ Gabrielino/Tongva Nation | ■ Gabrielino-Tongva Tribe |
| ■ Gabrielino/Tongva San Gabriel Band of Mission Indians | ■ Gabrielino Tongva Indians | ■ Santa Rosa Band of Cahuilla Indians |
| | of California Tribal Council | ■ Soboba Band of Luiseno Indians |

Of the above listed tribes, the Gabrieliño Band of Mission Indians – Kizh Nation (Kizh Nation) requested formal consultation by email on January 3, 2023, and recommended mitigation measures for this Project. The City considered and incorporated mitigation measures resulting from consultation, which are incorporated into this analysis, and formal AB 52 consultation was concluded on January 12, 2023.

Following a two-year suspension of Project activities, the City of Torrance reinitiated the proposed Project in March of 2023 with some slight design changes. Because of the time lapse and minor Project changes, the City re-engaged with the Kizh Nation in April of 2025 to confirm the adequacy of the previously recommended mitigation measures for TCRs.

During this consultation, the Kizh Nation reviewed the mitigation framework and requested minor revisions to the language to ensure that the measures remained culturally appropriate and protective of potential resources. The City concurred with these proposed modifications, and the mitigation measures presented in this section reflect the updated language and conditions as agreed upon by both parties.

1.4. Public Scoping Process

1.4.1. Notice of Preparation

The CPUC released a Notice of Preparation (NOP) on March 28, 2025, by filing it with the State Clearinghouse in the Governor’s Office of Land Use and Climate Innovation. The NOP was posted on the City’s project website, in both English and Spanish language, and mailed to multiple agencies and Native American tribes that are near the Project. The NOP notice was mailed to a total of 142 recipients, which includes residents near the Project site, Tribes, and Agencies. The NOP is included as Appendix A of this EIR.

1.4.2. Public and Agency Scoping Meetings

Scoping was conducted from March 28, 2025, to April 28, 2025. A public scoping meeting was held on Wednesday April 9, 2025, in the City of Torrance. There were no attendees and no associated public comments at the meeting.

The City also conducted an agency-specific meeting on Wednesday April 9, 2025, which was attended by representatives from the following agencies: Los Angeles County Metropolitan Transportation Authority (Metro) and the City of Lawndale.

1.4.3. Scoping Comments

Table 1-1, Scoping Comments Summary, shows the comments received during the public scoping period. This table identifies the environmental issue area that is commented upon, and presents a summary of the commentors concerns. Copies of these are included in Appendix B, Scoping Comments.

Table 1-1. Scoping Comments Summary

Commentor	Topic/Issue Area	Summary of Comments
LA County Sanitation Services	■ Notice of Preparation	■ Provides information about wastewater from the proposed project, including the proposed quantity, the receiving trunk sewer and its capacity, the treatment facility and its capacity, and associated connections fees. ■ States that the letter does not constitute a guarantee of wastewater service but advises the City that the Districts intend to provide service up to the levels that are legally permitted and informs the City of the existing capacity and any proposed expansion of the Districts' facilities.
California Department of Justice, Bureau of Environmental Justice	■ Air Quality, Section 4.1 ■ Greenhouse Gas Emissions, Section 4.4 ■ Noise, Section 4.7 ■ Transportation, Section 4.8	■ States that although the logistics industry is an important component of the economy, warehouses can result in environmental impacts, including those related to air quality and health, noise, and transportation. ■ Avoid land use conflicts between warehouses and sensitive receptors and mitigate impacts of any unavoidable conflicts. ■ Consider measures to reduce emissions associated with the Project to help the State meet air quality goals. ■ Requests consideration of the Attorney General Office's Bureau of Environmental Justice's document that contains best practices and mitigation measures for warehouse projects.
South Coast Air Quality Management District (SCAQMD)	■ Air Quality, Section 4.1 ■ Greenhouse Gas Emissions, Section 4.4	■ Recommends relying on SCAQMD's CEQA Air Quality Handbook, website, and thresholds, as well as the California Air Pollution Control Officers Association's California Emissions Estimator Model software for air quality and greenhouse gas analyses. ■ Identify potential adverse air quality and greenhouse gas impacts and air pollutant sources from the Proposed Project. ■ Ensure all relevant air permits are obtained if required. ■ Discuss any equipment requiring SCAQMD air permits and identify SCAQMD as a Responsible Agency, if applicable. If applicable, consult with SCAQMD to discuss the environmental information that will be needed in the EIR. ■ Recommends performing a mobile source health risk assessment, if applicable. ■ Concern regarding potentially adverse public health impacts from diesel particulate matter (DPM) associated with warehouse operations within close proximity of sensitive land uses. Evaluate the potential health risk impacts to these receptors and include mitigation measures that would reduce or eliminate DPM risks. ■ Notify the project proponent and potential future tenants that if operations involving the storage or transport of materials sterilized with ethylene oxide (EtO) would occur at the Project site, such activities would be subject to the requirements of SCAQMD Rule 1405. If applicable, conduct a health risk assessment for risks from EtO emissions. ■ Provides potential mitigation measures for significant adverse air quality impacts if they would occur. ■ Recommends review of SCAQMD Rule 2305 to ensure all compliance obligations are implemented.

1.5. Public Review and Comment

A Notice of Completion (NOC) has been filed with the State Clearinghouse to begin the public review period (Public Resources Code [PRC], Section 21161) for the Draft EIR. Pursuant to PRC Section 21092.3 and State CEQA Guidelines Section 15087(c), a notice of availability of the Draft EIR was posted in the Los Angeles County Clerk office.

The Draft EIR has been distributed directly to agencies, organizations, and interested individuals, and made publicly available for review and comment in accordance with Section 15087 of the CEQA Guidelines and PRC 21092(b)(3). In compliance with CEQA Guidelines Section 15129, a list of federal, State, and local agencies and other organizations contacted in preparation of this Draft EIR is provided in EIR Section 8 (List of Preparers).

1.6. Document Organization

The EIR is organized as follows:

Executive Summary. A summary description of the proposed Project, the alternatives, their respective environmental impacts, and the Environmentally Superior Alternative.

Section 1, Introduction. This discussion of the history, purpose and need for the project, and the public agency use of the EIR.

Section 2, Project Description. Detailed description of the proposed Project.

Section 3, Assessment Methodology and Cumulative Scenario. A description of the methods used to assess the environmental impacts, and a description of the cumulative scenario.

Section 4, Environmental Analysis. A comprehensive analysis and assessment of impacts and mitigation measures for the proposed Project by each environmental discipline. Each environmental discipline subsection describes the environmental setting and impacts of the proposed Project as related to the individual discipline. Recommended mitigation measures are included at the end of each discipline's section, as applicable. This section includes a discussion of the cumulative scenario and impacts with regard to the proposed Project and alternatives.

Section 5, Alternatives. Description of each alternative, the alternative's evaluation process, and the description of alternatives considered but eliminated from further analysis and the rationale thereof. This section includes the analysis of the impacts of each alternative, addressing the same environmental disciplines as Section 3. Finally, Section 4 identifies the CEQA Environmentally Superior Alternative and presents a discussion of the relative advantages and disadvantages of the proposed Project and alternatives that were evaluated.

Section 6, Other CEQA Considerations. This section presents an analysis of the Project's growth-inducing impacts and other CEQA requirements, irreversible commitment of resources, significant and unavoidable impacts and energy conservation. Section 6 also includes a description of the environmental disciplines that are not analyzed, and a discussion about why these were not included.

Section 7, Report Preparation Team and References.

Section 8, Mitigation Monitoring and Reporting Program. A discussion of the mitigation monitoring and reporting program requirements for the Project.

Section 9, Response to Comments (only in Final EIR). Includes the comments received on the Draft EIR, a response to the comment, and the location where the change was made in the Final EIR.

Appendices:**Appendix A:** Notice of Preparation (NOP)**Appendix B:** Scoping Comments**Appendix C:** Response Plan and Soil Management Plan (SMP)**Appendix D:** Air Quality Impact Analysis**Appendix E:** Biological Technical Report**Appendix F:** Cultural Resources Study**Appendix G:** Greenhouse Gas Analysis**Appendix H:** Geotechnical Design Update**Appendix I:** Supplemental Geotechnical Exploration**Appendix J:** Phase I Environmental Site Assessment**Appendix K:** Phase II Investigation Report**Appendix L:** Health Risk Assessment**Appendix M:** Noise Impact Analysis**Appendix N:** Vehicle Miles Traveled Analysis**Appendix O:** Energy Analysis**Appendix P:** Preliminary Standard Urban Stormwater Mitigation Plan Report**Appendix Q:** Preliminary Hydrology Study**Appendix R:** Response to Comments (in Final EIR only)**1.7. Incorporation by Reference**

The documents listed below are incorporated by reference into this DEIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the City of Torrance City Clerk's Office and Permit Center, 3031 Torrance Boulevard, Torrance, CA 90503.

- General Plan Update Draft Environmental Impact Report, prepared by City of Torrance, 2009.
- City of Torrance General Plan, prepared by City of Torrance, 2010.

1.8. Agency Use of the EIR

Several other agencies will rely on information in this EIR to inform them in their decisions regarding issuance of specific permits related to Project construction or operation. Responsible agencies are listed in Table 1-2.

1.8.1. Other Anticipated Permits and Approvals

Table 1-2. Permits that May be Required for the Project

Public Agency	Approvals and Decisions
City of Torrance	
Proposed Project – City of Torrance Discretionary Approvals	
Planning Commission	■ Certify the Project’s EIR and adopt the Mitigation Monitoring and Reporting Program and Findings and Statement of Overriding Considerations. ■ Approval of Conditional Use Permit, Waiver and Tentative Parcel Map
Subsequent City of Torrance Discretionary and Ministerial Approvals	
City of Torrance Subsequent Implementing Approvals	■ Approve Landscaping/Irrigation Plan ■ Issue Grading Permits ■ Issue Building Permits ■ Approve Road Improvement Plans ■ Approve Infrastructure Plans ■ Approve public right-of-way dedications ■ Approve Water Quality Management Plan ■ Approve connections to the municipal sewer system
Responsible Agencies – Approvals and Permits	
Torrance Municipal Water District	■ Approvals for construction of water infrastructure and connection to water distribution system.
Regional Water Quality Control Board (RWQCB)	■ Issuance of a Construction Activity General Construction Permit. ■ Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit.
Southern California Gas Company and Southern California Edison	■ Issuance of approvals necessary for the installation of new SoCalGas and SCE facilities/connections to service the Project.
South Coast Air Quality Management District	■ Issuance of permits that allow for the construction and operation of the Project.

1.9. Availability of the Draft EIR and Final EIR

This DEIR is being circulated for public review for 45 days. Interested agencies and members of the public are invited to provide written comments on the DEIR to the City at the mailing and email address shown below. Upon completion of the 45-day public review period, the City of Torrance will review all written comments received and prepare written responses for each. A Final EIR (FEIR) will incorporate the received comments, responses to the comments, and any changes to the DEIR that result from comments. The FEIR will be presented to the City of Torrance for consideration and potential certification as the environmental document for the Project. All persons who comment on the DEIR will be notified of the availability of the FEIR and the date of the public hearing before the City.

The DEIR is available to the general public for review at the following locations:

- City of Torrance City Clerk’s Office and Permit Center (3031 Torrance Blvd, Torrance, CA 90503)
- Katy Geissert Civic Center Library (3301 Torrance Blvd, Torrance, CA 90503) [Digital Copy]
- City of Torrance Community Development Department website: <https://www.torranceca.gov/our-city/community-development/planning-division/reports-land-use-studies/prologis-del-amo-and-prairie-center-project>

Comments on the DEIR should be sent to the following mailing or emailing address below, with the subject heading “Prologis Del Amo and Prairie Center Project”

City of Torrance Community Development Department
Attn: Robert Garcia, Planning Manager
3031 Torrance Boulevard
Torrance, CA 90503
Phone: 310.618.5990
Email: CDDinfo@TorranceCA.Gov

1.10. Mitigation Monitoring

Public Resources Code, Section 21081.6, requires that agencies adopt a monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code 21081 or adopted a Negative Declaration pursuant to 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or Negative Declaration.

The Draft Mitigation Monitoring and Reporting Program for the Prologis Del Amo and Prairie Center Project is included in the Draft EIR. The Final Mitigation Monitoring and Reporting Program will be included as part of the Final EIR, prior to consideration of the project by the Torrance Planning Commission.

2. PROJECT DESCRIPTION

This section provides all of the information required of an Environmental Impact Report (EIR) Project Description pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15124, including a description of the Project's precise location and boundaries; a statement of the Project's objectives; a general description of the Project's technical, economic, and environmental characteristics; and a description of the intended uses of this EIR, including a list of the government agencies that are expected to use this EIR in their decision-making processes; a list of the permits and approvals that are required to implement the Project; and a list of related environmental review and consultation requirements.

2.1. Project Location

The Project is located in the City of Torrance, Los Angeles County, California. The City is located south of the City of Lawndale and Gardena, west of the City of Carson, north of the City of Lomita and Rolling Hills Estates, and east of City of Redondo Beach. See Figure 2-1, Project Location.

The Project consists of approximately 39.11 acres, 31.32-acres of which are on-site, and 7.79 acres are off-site. The Project site encompasses 31.3 acres of vacant land located at the northeast intersection of Del Amo Boulevard and Prairie Avenue/Madrona Avenue (Assessor's Parcel Numbers [APNs] 7352-015-004, 7352-015-005, and 7352-015-006). The Project site is immediately south and adjacent to the Union Pacific Railroad. The site is bounded by Madrona/Prairie Avenue to the west, Del Amo Boulevard to the south, and railroad tracks from northwest to southwest, forming a triangularly shaped project site. The Project site is located approximately 0.5 miles east of California State Route 107 (SR-107), 1.7 miles west of State Route 213 (SR-213), and 1.8 miles south of Interstate 405 (I-405).

The proposed 7.79 acres of offsite impacts include future road improvements (including installation of a sewer line) along Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court. See Figure 2-2, Project Site.

2.2. Project Objectives

The underlying purpose of the Project is to develop the site with an industrial building that will implement the Torrance General Plan, create opportunities for employment within the City, and serve the local market demand for industrial building space. The following is a list of specific objectives that the proposed Project is intended to achieve.

- A. Develop an industrial project on the Project site in conformance with the applicable goals, objectives, and policies of the Torrance General Plan that is compatible with adjoining land uses;
- B. Efficiently develop an underutilized property with industrial uses in proximity to regional highways (I-405 and I-110) to help meet regional demands for goods movement facilities;
- C. Expand economic development and facilitate job creation in the City of Torrance by establishing new industrial development adjacent to or near already-established industrial uses;
- D. Maximize new job opportunities within the City of Torrance which improves the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances;
- E. Maximize opportunities for positive economic benefit to the City, including new sales and property tax revenues that can be used for City services;

- F. Develop a Class A,⁵ speculative⁶ industrial building in Torrance that is designed to meet contemporary industry standards, can accommodate a wide variety of users, and is economically competitive with similar industrial buildings in the local area and region;
- G. Redevelop a property that has access to available infrastructure, including roads and utilities;
- H. Provide a landscaping plan that features drought-tolerant plant materials to provide for an aesthetically pleasing outdoor environment while minimizing the demand for water resources.

2.3. Existing Land Use

2.3.1. Site History

The existing Project site is currently vacant (see Figure 2-2, Project Site, for an aerial image of the site). An equestrian facility (operated by a non-profit group, Torrance Mounted Posse) was once located on the site, from at least 1989 until recently, when it was relocated to a parcel across the street as a condition of the sale of the Project parcel. The structures associated with the facility are set to be demolished under a construction permit from the City of Torrance.

Historically, the Project site was used as an out-parcel ancillary to the Torrance Oil Refinery for the placement or disposal of refinery wastes, which constitutes a recognized environmental condition. The Refinery is the subject of Cleanup and Abatement Orders⁷ from the Los Angeles Regional Water Quality Control Board for releases at and from the Refinery (CAO Numbers 88-43, 89-136, and 95-116) and the Project site is also within the area subject to those orders. Prior to any construction activities, remediation work will be performed with the oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB). A Response Plan and Soil Management Plan (SMP) have been prepared and are under review by the LARWQCB (SCS Engineers, 2025a and 2025b). The Response Plan and SMP are included as Appendix C.

2.3.2. Vegetation and Topography

The majority of the site is vegetated with non-native grasses and forbs with some ornamental vegetation. Elevation on the site is approximately 100 feet above mean sea level (amsl) and slopes from west to east. In 2025, Prologis conducted non-native tree removal as part of a tree removal plan primarily targeting wattle (*Acacia* spp.) in the western portion of the site. Otherwise, there is no active vegetation management on the site.

2.3.3. Surrounding Land Uses

Surrounding land uses include commercial and industrial uses to the south and residential use to the west and southwest of Project site. The extended stay hotel to the west of the Project site is considered a residential use.

2.4. Project Characteristics

The Project Applicant, Prologis L.P. (Prologis), is requesting the following entitlements, also listed in Section 2.5: Conditional Use Permit; Tentative Parcel Map; and Waiver (to allow proposed retaining walls to exceed the maximum 5-foot height requirement). Approval of the entitlements would allow for the development of a 403,033 sf speculative, Class A warehouse building, including 15,000 sf of office on 31.3

⁵ A "Class A" building is a premier commercial property characterized by its high-quality construction, prime location, state-of-the-art amenities, and professional management. Class A buildings are typically very energy efficient.

⁶ This building is considered speculative because there is no secured tenant.

⁷ The Cleanup and Abatement Orders are for cleanup of the disposal area at the Site, to protect human health and the environment by limiting exposure to chemicals of potential concern (COPCs) in soil and remediating detected COPCs in soil down to the development depth of 60 feet amsl.

acres. The proposed building would include 56 dock doors on the northeastern portion of the building. See Figure 2-3, Proposed Site Plan.

The Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. With cold storage, the Project would likely include rooftop ventilation systems, or air conditioning units on the buildings. Since the future occupants of the buildings are currently unknown, the analysis will evaluate both a single tenant and multi-tenant options: Option 1 - Single Tenant Building and Option 2 - Multi-Tenant Building. The Multi-Tenant Building is presumed to have two tenants.

Figure 2-1. Project Location

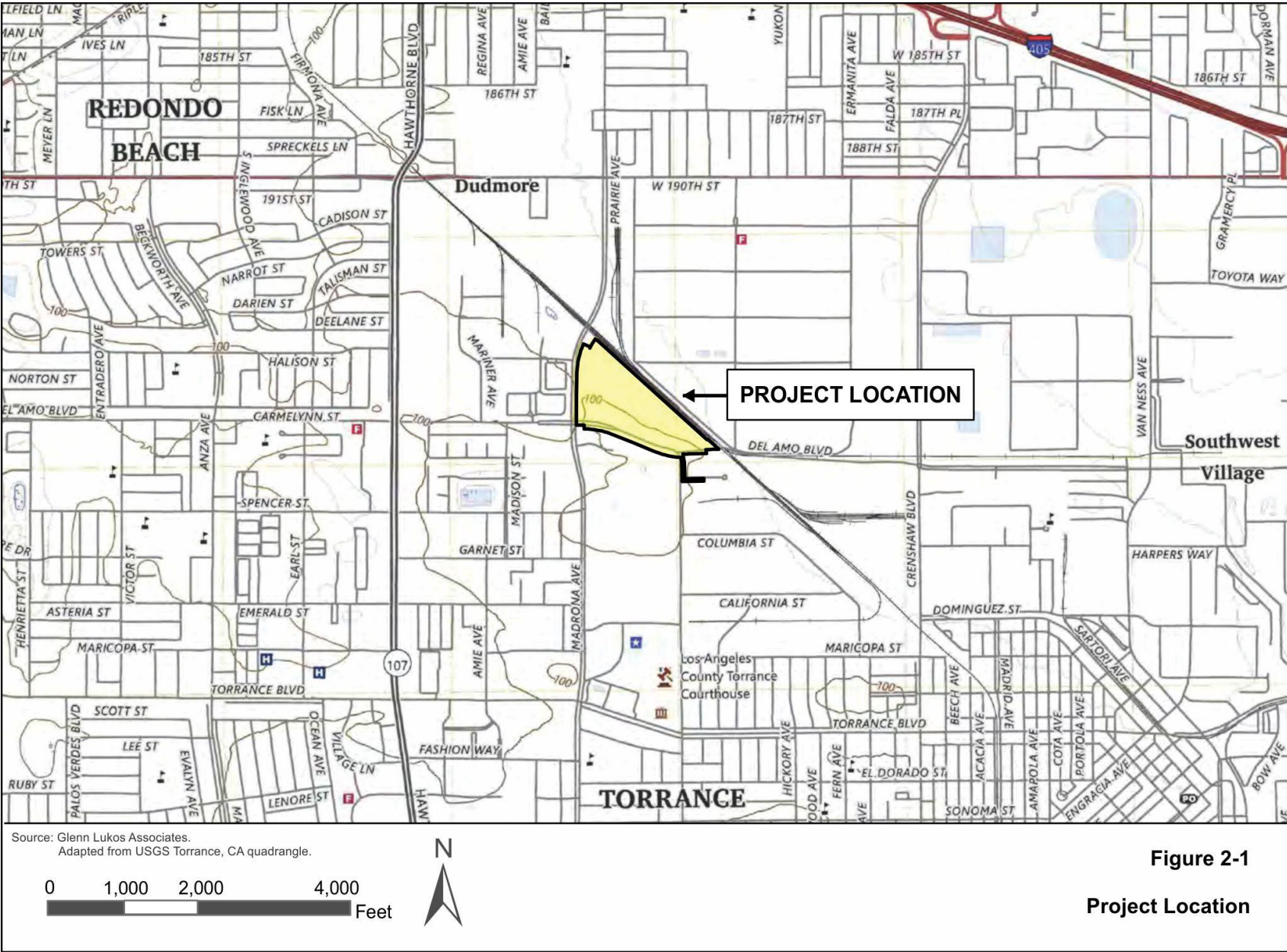
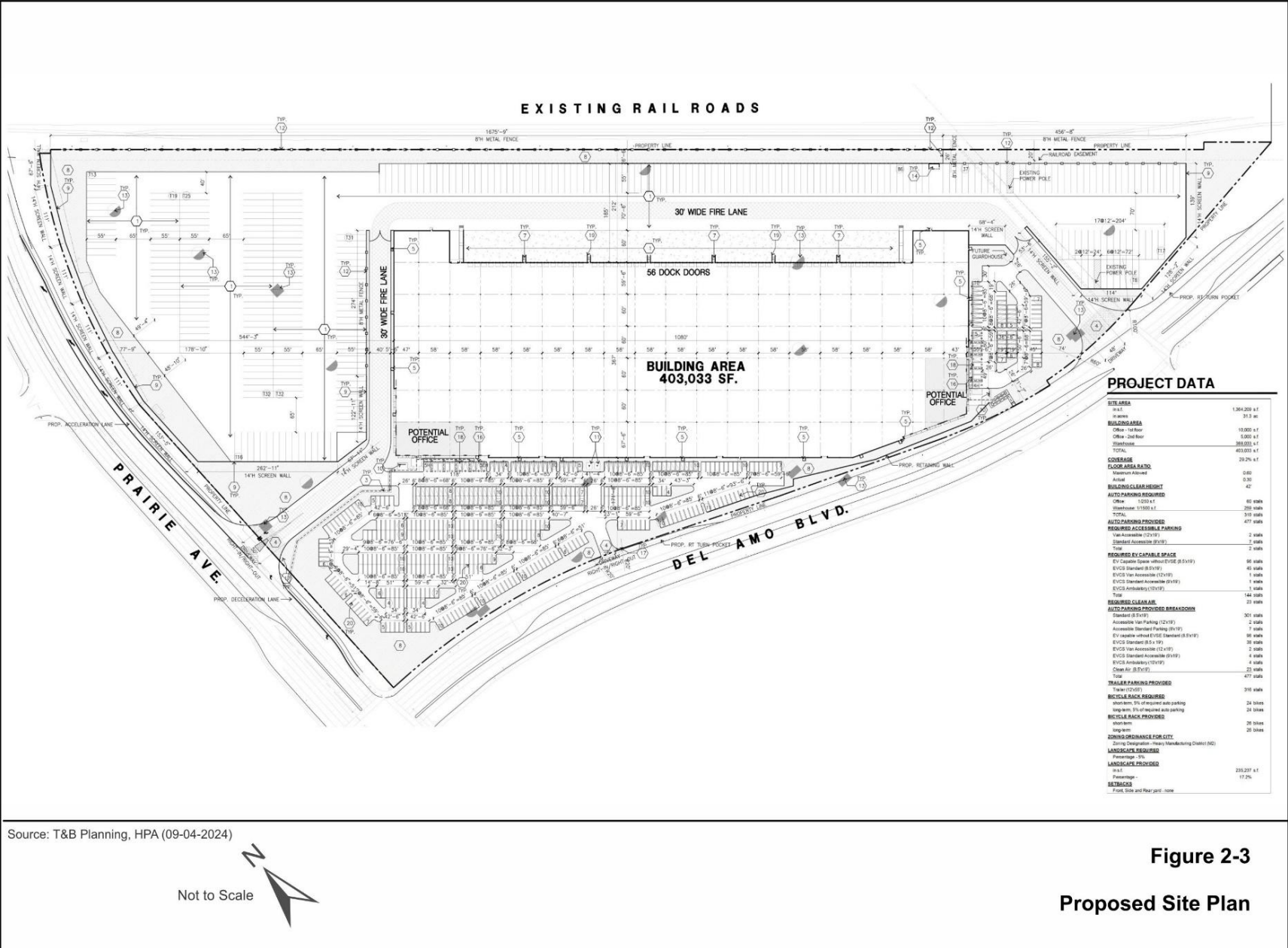


Figure 2-2. Project Site



Figure 2-3. Proposed Site Plan



Source: T&B Planning, HPA (09-04-2024)



Not to Scale

Figure 2-3

Proposed Site Plan

2.4.1. Description of the Proposed Project

Architectural Features

The proposed building would be designed in a contemporary style and constructed in compliance with California Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the Title 24 California Green Building Standards Code (CALGreen Code). The building would be constructed to a clear height of 42 feet. Architectural features associated with the building include the use of concrete tilt-up panels, wood paneling, tinted glass, metal canopies, and architectural reveals. The building would be painted with a mixture of colors, including white, grays, brown and blue tones.

Landscape Plan

The Project includes landscaped areas, hardscaping, and other exterior features. Landscaping would vary in height adjacent to the buildings along all street frontages. The Project would include approximately 235,237 sf of landscaping (17.2 percent of the Project site) that would be incorporated around the Project site boundaries along Prairie Avenue and Del Amo Boulevard. A variety of shrubs, accent plants, and ground cover are proposed along the northern, western, eastern, and southern perimeter of the Project site's frontage, the building elevation and parking area. A total of 295 trees would be planted on-site, including approximately 17 48-inch box, 228 24-inch box, and 50 15-gallon trees along the southeast and southwest boundaries; the eastern, western, and southern perimeter of the building, and within the employee parking areas. All trees within 5 feet of hardscape would have a 12-inch deep linear root barrier.

Vehicle/Truck Access and Parking

Regional access to the Project site is available from the I-405 Freeway via the Crenshaw Boulevard/182nd Street and 190th Street/Western Avenue interchanges. Vehicular and truck traffic access will be provided via the following driveways:

- Driveway 1 on Prairie Avenue – Right-in/Right-out access for trucks and passenger cars
- Driveway 2 on Del Amo Boulevard – Right-in/Right-out access for passenger cars only
- Driveway 3/Maple Avenue on Del Amo Boulevard – Full Access for both passenger cars and trucks

The Project proposes 477 standard automobile parking stalls including 96 electric vehicle (EV) capable spaces without electric vehicle supply equipment (EVSE), 48 electric vehicle charging station (EVCS) spaces, 23 clean air spaces, and 316 trailer parking stalls (12 feet x 55 feet). Trailer parking stalls would be shielded from Prairie Avenue and Del Amo Boulevard via a proposed 14-foot screen wall along the northwestern portion of the Project site and southeastern portion of the site.

Infrastructure Improvements

Water Service

Water service to the Project site would be provided by the Torrance Municipal Water District. Water would be accommodated via a proposed 12-inch water main and 3-inch water line connection to the existing water infrastructure on Del Amo Boulevard.

Sanitary Sewer Service

Sanitary sewer service to the Project site would be provided by the City of Torrance. A sewer lift station is proposed at the southeastern corner of the building. Proposed 8-inch sewer lines would be extended from the southeastern corner of the building, which would connect to an existing sewer main on Del Amo Boulevard. The Project would extend the 8-inch sewer main within Oregon Court 750 linear feet.

Drainage

The proposed drainage will ultimately be routed to the southeast corner of the Project site. The Project site's drainage shall be collected in a series of inlets, then routed through 18 inch to 48 inch storm drain pipes to an underground detention system. The preliminary design for the detention system includes a total of 1,900 linear feet of 120 inch diameter pipe. Once routed to the detention system, the stormwater would then be routed to a diversion manhole that will send the 85th percentile flow to a sump pump that discharges into three wetland mods working in series. The remaining high flows would be diverted through an outlet pipe that will surcharge into a separate diversion manhole with a high-flow pump. The high-flow pump will be designed to have a maximum outflow rate of 6 cubic feet per second (cfs) to not exceed the downstream proposed parkway drain velocity capacity onto Del Amo Boulevard.

Dry Utilities

Electrical service to the Project site is provided by Southern California Edison (SCE). The Project would involve utility connections to existing infrastructure to provide electric power and telecommunications services to the Project site.

2.4.2. Construction Characteristics

Remediation

As noted in Section 2.3.1, the Project site was previously used as an out-parcel ancillary to the Torrance Oil Refinery. A Phase II Environmental Site Assessment (ESA) was prepared for the Project site and concluded that the disposal area (northwest portion of the site) for refinery waste on the site contained asbestos containing materials (ACMs) and other contaminants including Total Petroleum Hydrocarbons (TPH) and Volatile Organic Compounds (VOCs). Additionally, a human health risk screening evaluation was conducted as part of the Phase II ESA and concluded that health risk screening levels were exceeded, and that the 9.2 acre disposal area shall be remediated. As a result, a Response Plan and SMP were prepared and are under review by the LARWQCB (SCS Engineers, 2025a and 2025b; Appendix C).

The Response Plan and SMP would be implemented under the lead oversight of LARWQCB in general accordance with the California Land Reuse and Revitalization Act (CLRRRA) of 2004. Prologis entered into the CLRRRA Agreement, and would be responsible for implementing the Response Plan. Prologis would redevelop the property to implement the proposed Project after remediation has occurred. Implementation of the Response Plan will occur irrespective of Project approval with the appropriate environmental clearance processed by LARWQCB.

The remediation process would include the implementation of ex-situ solidification (ESS) or in-situ solidification (ISS) treatments. Specifically, the remediation process would include the following steps:

1. **Stockpiling Soils:** Prior to implementing ESS or ISS treatments, soils that meet regulatory screening criteria and are determined to be acceptable for reuse from soil sampling testing would be excavated and stockpiled onsite for future reuse as ESS/ISS cover material.
2. **Ex-Situ Solidification (Shallow Soils):** Shallow soil would be excavated to prepare load-bearing pads for ISS equipment, which consists of a large drill rig. The excavated soil would undergo ESS treatment in place where soil is mixed in the bucket with Portland cement and water to immobilize the soil contaminants through soil cementation/solidification. The generated ESS material, once partially cured for approximately 12-24 hours, will be placed into pre-excavated areas and re-compacted.
3. **In-Situ Solidification (Deeper Soils):** For deeper soil impacts, ISS would be used. ISS would use a large diameter drill rig equipped with an 8-foot-wide auger. During drilling, a grout mixture of Portland cement and water would be pumped through the hollow stem of the drill rig and into the auger's injection ports, allowing it to disperse throughout the soil matrix to immobilize soil contaminants.

The rotating auger would thoroughly mix the grout with the existing soil while moving downward to create a homogeneous cementitious column(s) to the design depth (not to exceed the development depth of 60 feet above mean sea level or approximately 30 feet below grade).

4. **Cleanup:** Following ESS/ISS remediation, the disposal/treatment area would be covered with a 5-foot thick layer of clean soil, then paved at the surface. Clean soil would be sourced from the designated cut and fill areas and/or imported from an approved/pre-screened offsite source.

After remediation and with implementation of the SMP and Response Plan, the site would allow for redevelopment of industrial uses to proceed.

Conceptual Grading Plan

The grading plan indicates that the Project's grading operation would excavate approximately 49,200 cubic yards of cut and require approximately 340,700 cubic yards of fill. The Project would require approximately 292,000 cubic yards of imported soil. Approximately 5,000 cubic yards of export would be required during remediation. The physical disturbance area would be limited to the Project site with the exception of off-site improvements. All off-site infrastructure and improvements would occur concurrently with the construction of the proposed Project. Off-site improvements include the extension of the Oregon Court sewer main on Maple Avenue 750 linear feet.

Anticipated Construction Schedule and Equipment

Construction is expected to occur at one time and would take approximately 35 months. Table 3-1, Construction Schedule, presents the duration of construction activity for each construction stage. The duration and associated equipment shown represent a reasonable approximation of the expected construction fleet as required. The composition of the construction equipment fleet that the Project Applicant intends to use to develop the Project site is summarized in Table 3-2, Construction Equipment Fleet.

Table 3-1. Construction Schedule

Stage Name	Duration (Days)	Stage Name	Duration (Days)
Demolition	5	Vertical Construction	94
Clearing	5	Site Work Fine Grading	10
Earthwork	15	Building Construction	90
Export/Remediation	110	Paving	11
Import	96	Architectural Coating	11
Rough Grading	27		

Note: Each stage occurs consecutively, except for Paving and Architectural Coating, which would fully overlap.

Table 3-2. Construction Equipment Fleet

Stage Name	Equipment	Amount	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	1	8
	Rubber Tired Dozers	1	8
Clearing	Dumpers/Tenders	4	8
	Tractors/Loaders/Backhoes	2	8
Earthwork	Rubber Tired Dozers	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Scrapers	2	8

Stage Name	Equipment	Amount	Hours Per Day
Export/Remediation	Excavators	1	8
	Other Construction Equipment	1	8
	Tractors/Loaders/Backhoes	1	8
Import	Dumpers/Tenders	24	8
	Dumpers/Tenders	37	8
	Rubber Tired Dozers	1	8
	Sweepers/Scrubbers	1	8
Rough Grading	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	1	8
	Scrapers	6	8
Vertical Construction	Graders	1	8
	Rollers	1	8
	Scrapers	2	8
	Tractors/Loaders/Backhoes	1	8
Site Work Fine Grading	Graders	1	8
	Rollers	1	8
	Scrapers	1	8
	Skid Steer Loaders	2	8
Building Construction	Tractors/Loaders/Backhoes	1	8
	Cranes	2	8
	Forklifts	5	8
	Generator Sets	2	8
	Tractors/Loaders/Backhoes	5	8
Paving	Welders	2	8
	Pavers	2	8
	Paving Equipment	2	8
Architectural Coating	Rollers	2	8
	Air Compressors	1	8

2.4.3. Operational Characteristics

Operations

Since it is currently unknown whether the Project will have single tenant or multi-tenant industrial occupancy, the analysis will evaluate two options:

- Option 1: Single Tenant Building
- Option 2: Multi-Tenant Building

For Option 1, trucks will have access to the building via Prairie Avenue and Del Almo Boulevard, however, the majority of the truck access is proposed to occur at the signalized driveway on Del Amo Boulevard. For Option 2, it is presumed that there would be two tenants, and that, approximately 25 percent of the trucks would access the site via the driveway on Prairie Avenue while the remaining 75 percent of the trucks would access the site via Del Amo Boulevard. It is anticipated that both the building and the truck court area would be partitioned to separate the two tenants (i.e., no reciprocal access within the truck court or within the building). Access into the truck court will also be secured via a security gate on either

side of the building (applicable to both Option 1 and Option 2). The passenger car trip distributions are anticipated to remain the same between Option 1 and Option 2 as the parking areas for employees would not be partitioned or physically separated aside from those parking spaces that are already located on the east side of the building.

Estimated Traffic Generation

The anticipated volumes of traffic that would be generated by each component of the Project were calculated by using trip generation rates from the Institute of Transportation Engineers' *Trip Generation Manual* (Institute of Transportation Engineers, 2021). The Project's estimated traffic generation is used for the purpose of analyzing impacts related to air quality, greenhouse gas emissions, energy, and noise. Determining traffic generation for a specific project is based upon forecasting the amount of traffic that is expected to be both attracted to and produced by the specific land uses being proposed for a given development. Trip generation for the Project was conservatively developed using rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition) for High-Cube Fulfillment Center Warehouse (ITE Land Use Code 155) and High-Cube Cold Storage Warehouse (ITE Land Use Code 157). High-Cube Fulfillment Center Warehouse (ITE Land Use Code 155) has been used to derive site specific trip generation estimates for up to 362,730 square feet (90 percent of the proposed Project). High-Cube Cold Storage Warehouse (ITE Land Use Code 157) has been used to derive site specific trip generation estimates for up to 40,303 square feet (10 percent of the proposed Project). Refrigerated trucks or reefers would be used for cold storage goods.

Trip generation for heavy trucks was further broken down by truck type (or axle type) per the South Coast Air Quality Management District (SCAQMD) recommended truck mix. The total truck percentage is comprised of 3 different truck types: 2-axle, 3-axle, and 4+-axle trucks. Passenger Car Equivalent (PCE) factors were applied to the trip generation for heavy trucks. PCEs allow the typical "real-world" mix of vehicle types to be represented by a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analysis. The proposed Project is anticipated to generate a total of 2,424 actual vehicle trip-ends per day with 318 AM peak hour trips and 439 PM peak hour trips.

2.5. Permits and Approvals

The City of Torrance has primary approval responsibility for the Project. As such, the City serves as the Lead Agency for this EIR pursuant to CEQA Guidelines Section 15050. The Torrance Planning Commission is the decision-making authority for the Project. The Torrance Planning Commission will make a final decision to approve, approve with changes, or deny this EIR and the Project Applicant's requested discretionary applications (Conditional Use Permit, Waiver and Tentative Parcel Map). The City will consider the information contained in this EIR and the Project's Administrative Record in its decision-making processes. In the event of approval of the Project and certification of the EIR, the City would conduct administrative reviews and grant discretionary and ministerial permits and approvals to implement Project requirements and conditions of approval.

A list of the actions under City of Torrance jurisdiction is provided in Table 3-1, Project-Related Approvals/Permits. In addition, additional discretionary and/or administrative actions may be necessary from other government agencies to fully implement the Project.

Table 3-3. Project-Related Approvals/Permits

Public Agency	Approvals and Decisions
City of Torrance	
Proposed Project – City of Torrance Discretionary Approvals	
Planning Commission	■ Certify the Project’s EIR and adopt the Mitigation Monitoring and Reporting Program and Findings and Statement of Overriding Considerations. ■ Approval of Conditional Use Permit, Waiver and Tentative Parcel Map
Subsequent City of Torrance Discretionary and Ministerial Approvals	
City of Torrance Subsequent Implementing Approvals	■ Approve Landscaping/Irrigation Plan ■ Issue Grading Permits ■ Issue Building Permits ■ Approve Road Improvement Plans ■ Approve Infrastructure Plans ■ Approve public right-of-way dedications ■ Approve Water Quality Management Plan ■ Approve connections to the municipal sewer system
Responsible Agencies – Approvals and Permits	
Torrance Municipal Water District	■ Approvals for construction of water infrastructure and connection to water distribution system.
Regional Water Quality Control Board (RWQCB)	■ Issuance of a Construction Activity General Construction Permit. ■ Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit.
Southern California Gas Company and Southern California Edison	■ Issuance of approvals necessary for the installation of new SoCalGas and SCE facilities/connections to service the Project.
South Coast Air Quality Management District	■ Issuance of permits that allow for the construction and operation of the Project.

3. ASSESSMENT METHODOLOGY

3.1. Introduction to Environmental Analysis

Section 4 identifies the environmental impacts of the proposed Project, in accordance with State CEQA Guidelines sections 15126 and 15126.2. It also presents and applies criteria used to determine whether an adverse impact is significant under CEQA and describes feasible mitigation measures, if any, that could reduce each significant adverse impact to a level of less than significant.

3.2. Impact Analysis Methodology

Section 4 of this EIR examines the environmental consequences associated with the Proposed Project and the alternatives to it. Section 4 includes analyses of the environmental disciplines listed below:

- | | |
|--------------------------------------|-------------------------------------|
| 4.1 Air Quality | 4.6 Hazards and Hazardous Materials |
| 4.2 Biological Resources | 4.7 Noise |
| 4.3 Cultural Resources | 4.8 Transportation |
| 4.4 Greenhouse Gas Emissions | 4.9 Tribal Cultural Resources |
| 4.5 Geology, Soils, and Paleontology | |

Within each environmental discipline, discussions are presented in the following order:

- Environmental Setting
- Applicable Regulations, Policies, and Standards
- Applicable Impact Significance Criteria
- Environmental Impacts of the proposed Project and Proposed Mitigation
- Cumulative Environmental Impacts of the proposed Project
- Mitigation Measures
- References

The analysis of impacts associated with each environmental discipline provides the regulatory agencies, the lead agency's decision makers, and the general public sufficient information to understand and meaningfully consider the severity of environmental impacts of the proposed Project.

Section 5 presents the alternatives, including the No Project Alternative, and includes an analysis for each issue area, a comparison of alternatives, and the identification of the Environmentally Superior Alternative under CEQA. Other CEQA analysis requirements, as well as a description of the environmental issue areas that would result in a less-than-significant or no impact, are addressed in Section 6.

3.2.1. CEQA Requirements

CEQA applies to any project that requires a discretionary approval by a state or local body. CEQA strives to facilitate informed governmental decisions regarding discretionary projects and activities that may affect the environment. The regulations implementing CEQA are designed to allow flexibility in consolidating and avoiding duplication among multiple layers of governmental review.

Under CEQA, impacts are evaluated using significance thresholds or standards. These thresholds derive from the CEQA Guidelines Appendix G checklist, which provides sample questions that may be tailored to satisfy individual agency needs and project circumstances. For each resource defined in the checklist, a determination is made that there is (1) no impact, (2) a less than significant impact, (3) a less than significant impact with mitigation incorporated, or (4) a significant and unavoidable impact.

Significant impacts under CEQA require the public agency that is approving, funding, or carrying out the project to consider mitigation, where feasible, to avoid or reduce significant impacts to less than significant

levels. CEQA Guidelines Sections 15126.2(a-c), 15358, and 15382 further define and describe significant effects.

For the purpose of this document, and pursuant to CEQA Guidelines (Section 15125(a)), the environmental setting used for the impact analysis reflects conditions in the vicinity of the proposed Project at the time of issuance of the Notice of Preparation (March 28, 2025). The EIR evaluates the environmental consequences of the proposed Project and alternatives, and the impact of any mitigation measures. Under CEQA, the impacts identified are compared with predetermined, specific significance criteria or thresholds, and are classified according to significance categories listed in each environmental discipline.

3.2.2. Impact Analysis and Significance Criteria

The analysis completed for each environmental discipline follows the CEQA requirements defined above. In each section, mitigation measures recommended in this EIR may apply.

The Impact Analysis subsection for each resource topic presents an assessment of the identified direct and indirect impacts and discloses the level of significance for each impact. The analysis in Section 4 applies to the construction, operations, and maintenance of the Project as a whole unless specifically stated. A significant impact is defined under CEQA as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project” (State CEQA Guidelines Section 15382). The terms “effect” and “impact” used in this document are synonymous and can refer to effects that are either adverse or beneficial.

Direct effects	Effects caused by the proposed Project that occur at the same time and place as the proposed Project
Indirect effects	Effects caused by the proposed Project that occur later in time, or further in distance, but are still reasonably foreseeable
Residual impacts	Impacts that still meet or exceed significance criteria after application of mitigation and, therefore, remain significant
Cumulative impacts	Impacts resulting from the proposed Project when combined with similar effects of other past, present, and reasonably foreseeable future projects, regardless of which agency or person undertakes such projects (cumulative impacts could result from individually insignificant but collectively significant actions taking place over time)
Short-term impacts	Impacts expected to occur during construction or decommissioning that do not have lingering effects for an extended period after the activity is completed
Long-term impacts	Impacts that would persist for an extended period of time

The significance of each impact is determined based on an analysis of the impact, compliance with any recommended mitigation measures, and the level of impact remaining compared to the applicable significance criteria. Impacts are classified as one of the five categories listed below.

Significant and Unavoidable	A substantial or potentially substantial adverse change from the environmental baseline that meets or exceeds significance criteria, where either no feasible mitigation can be implemented, or the impact remains significant after implementation of mitigation measures
Less Than Significant with Mitigation	A substantial or potentially substantial adverse change from the environmental baseline that can be avoided or reduced to below applicable significance thresholds

Less than Significant	An adverse impact that does not meet or exceed the significance criteria of a particular environmental issue area and, therefore, does not require mitigation
Beneficial	An impact that would result in an improvement to the physical environment relative to baseline conditions
No Impact	A change associated with the project that would not result in an impact to the physical environment relative to baseline conditions

The analysis in this EIR is prepared with the understanding that the Applicant would obtain all required permits and approvals from other agencies and comply with all legally applicable terms and conditions associated with those permits and approvals. Implementation of the Project, which is described in Section 2, Description of the Proposed Project, including implementation of any mitigation measures identified to reduce or avoid significant adverse impacts, would be monitored in accordance with a Mitigation Monitoring and Reporting Program (MMRP), summarized below.

3.2.3. Mitigation Measures and Mitigation Monitoring and Reporting Program

An EIR is required to indicate the ways any significant effects of a project on the environment can be mitigated or avoided. A governmental agency must prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives (discussed below) or mitigation measures when the agency finds the changes to be feasible. (CEQA, § 21002.1, subd. (a) & (b); State CEQA Guidelines, Section 15002, subd. (a).) Implementation of multiple mitigation measures may be needed to reduce an impact to a less-than-significant level. Impacts that still meet or exceed significance criteria after application of mitigation measures are considered residual impacts that remain significant.

Significant impacts under CEQA require the public agency that is approving, funding, or carrying out the project to consider mitigation, where feasible, to avoid or reduce the impacts to less than significant levels. Where needed, mitigation measures are recommended in each section, if required to avoid or minimize impacts that are identified. The mitigation measures recommended by this EIR have been identified in the impact assessment sections and presented in a subsection at the end of the impact analysis for each discipline.

Under CEQA, the lead agency must adopt a reporting or monitoring program for any changes made to the project or conditions of project approval adopted to mitigate or avoid significant effects on the environment (i.e., MMRP). (CEQA, § 21081.6, subd. (a)(1).)

The impact sections throughout Section 4, and the MMRP included in Chapter 8 the EIR, identify all mitigation measures to reduce significant impacts. The City would ensure implementation of all mitigation measures.

3.2.4. Alternatives

Pursuant to State CEQA Guidelines Section 15126.6, an EIR must describe and evaluate a range of reasonable alternatives that would feasibly attain most of the Project's basic objectives while avoiding or substantially lessening any of the significant impacts of the Project as proposed. The range of alternatives is governed by the "rule of reason," that is, an EIR needs to describe and evaluate only those alternatives necessary to permit a reasoned choice and to foster informed decision-making and public participation. (State CEQA Guidelines, Section 15126.6, subd. (f)) Section 5, Alternatives, describes and analyzes the alternatives to the proposed Project, and includes the impact analysis for each alternative scenario considered, compares the alternatives evaluated to the proposed Project, and identifies the Environmentally Superior Alternative.

As explained in Section 5 (Alternatives), the following alternatives are evaluated for each issue area:

- **Alternative 1:** No Project Alternative
- **Alternative 2:** All Manufacturing Alternative

3.3. Issue Areas Found to Have Nominal or No Impacts

The following topics would result in a less-than-significant or no impact. Accordingly, the EIR does not provide an in-depth analysis for the following topics. These topics are discussed in Section 6.3, Effects Not Found to be Significant.

- | | | |
|--------------------------------------|--------------------------|---------------------------------|
| ■ Aesthetics | ■ Land Use and Planning | ■ Recreation |
| ■ Agriculture and Forestry Resources | ■ Mineral Resources | ■ Utilities and Service Systems |
| ■ Energy | ■ Population and Housing | ■ Wildfire |
| ■ Hydrology and Water Quality | ■ Public Services | |

3.4. Cumulative Projects

A cumulative impact analysis is required under CEQA. Under CEQA Guidelines, “a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts” (14 CCR §15130(a)(1)). An EIR must discuss cumulative impacts if the incremental effect of a project, combined with the effects of other projects is “cumulatively considerable” (14 CCR §15130(a)). Such incremental effects are to be “viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects” (14 CCR §15164(b)(1)). Together, these projects comprise the cumulative scenario for the cumulative analysis.

Both the severity of impacts and the likelihood of their occurrence are to be reflected in the discussion, “but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion of cumulative impacts shall be guided by standards of practicality and reasonableness, and shall focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact” (14 CCR §15130(b)).

For purposes of this EIR, the proposed Project would cause a cumulatively considerable and therefore significant contribution to a cumulative impact if:

- The cumulative effects of other past, current, and probable future projects without the Project are not significant and the Project’s incremental impact is substantial enough, when added to the cumulative effects, to result in a significant cumulative impact; or
- The cumulative effects of other past, current, and probable future projects without the Project are already significant and the Project would result in a cumulatively considerable contribution to the already significant effect. The standards used herein to determine whether the contribution is cumulatively considerable include the existing baseline environmental conditions, and whether the project would cause a substantial increase in impacts, or otherwise exceed an established threshold of significance.

3.4.1. Methodology

There are two different methodologies for identifying what would constitute the cumulative scenario. One is to use a “list of past, present, and probable future projects producing related or cumulative impacts” (14 CCR §15130(b)(1)(A)). An alternate method of establishing the cumulative scenario for the analysis is to use a “summary of projects contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact” (14 CCR §15130(b)(1)(B)).

The approach used in this EIR is the project list approach, with cumulative projects included in Table 3-4, Cumulative Projects in the Project Vicinity, and Figure 3-1, Cumulative Projects. In addition, analysts considered general plans and other documents, but did not rely on them to establish the cumulative scenario for the analysis.

The project list includes those projects found within a geographic area sufficiently large to provide a reasonable basis for evaluating cumulative impacts. The area over which the cumulative scenario is evaluated may vary by resource, because the nature and range of potential cumulative effects vary by resource. This area is identified as the geographic scope for the analysis of cumulative impacts related to a particular resource.

The analysis of cumulative effects must consider a number of variables. These include geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The geographic scope of the analysis is based on the nature of the geography surrounding the proposed Project and the characteristics and properties of each resource and the region to which they apply. In addition, each project in a region will have its own implementation schedule, which may or may not coincide with the proposed Project's schedule.

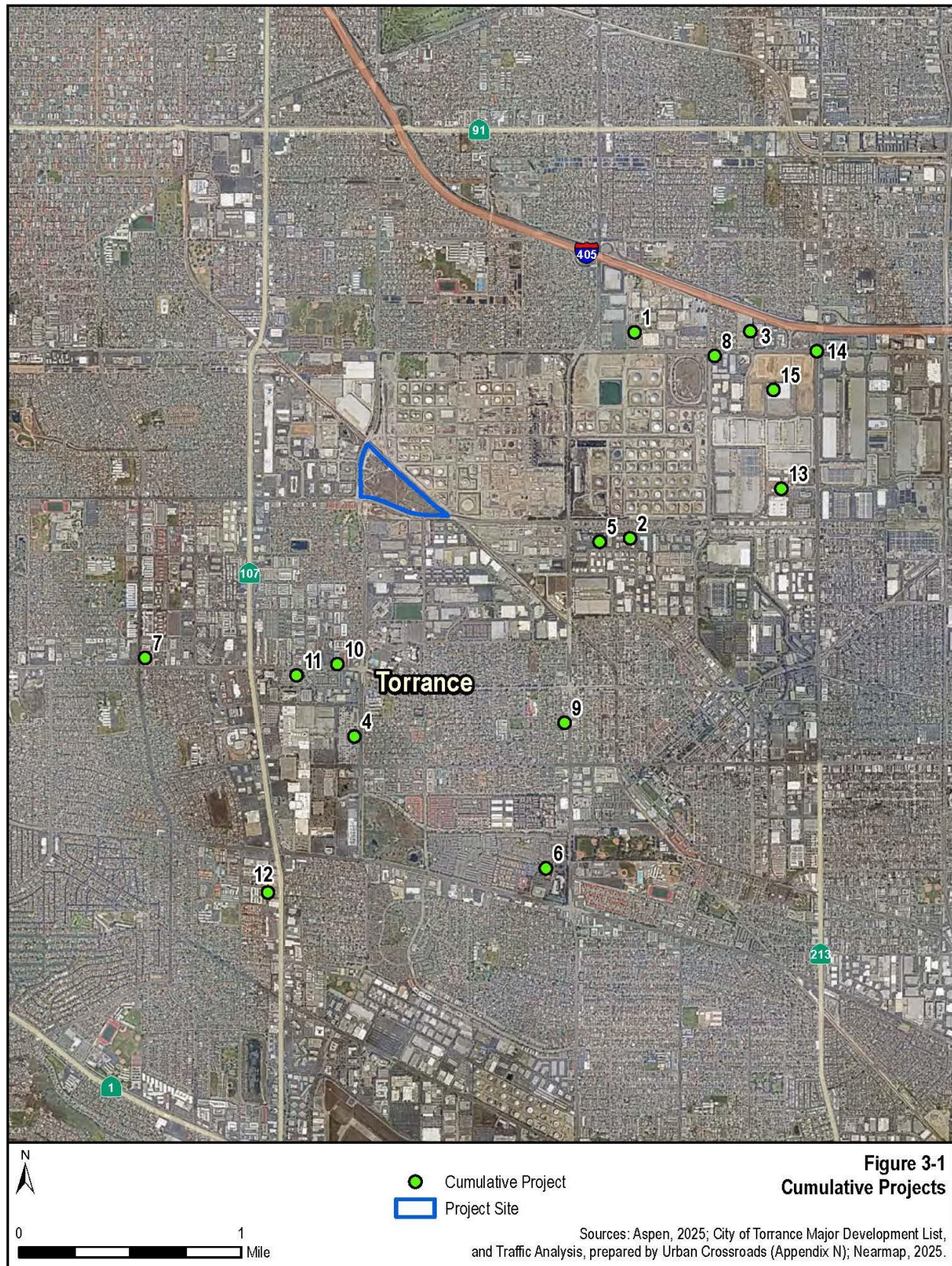
Figure 3-1. Cumulative Projects

Table 3-4. Cumulative Projects in the Project Vicinity

Map No.	Project Name	Description/Location	Location in Relation to the Proposed Project	Project Status	Source of Project Information
1	Comstock Development	Request for approval of a Conditional Use Permit to allow a new light industrial building measuring 291,000 square feet, in conjunction with a Division of Lot for consolidation purposes, and an Environmental Assessment, on property located at 2555 190th Street (APN: 4090-021-032; 4090-021-33; 4090-021-34).	~1.3 miles northeast	Application Filed 6-2-20; CEQA Public Review Period 2-18-25 to 3-20-25	City of Torrance Major Development List
2	Torrance Commerce Center Project	Request for approval of a Conditional Use Permit to allow a new light industrial building measuring 132,000 square feet, in conjunction with an Environmental Assessment, a Division of Lot for lot consolidation purposes, and a Waiver of the wall height limit, on property located at 2281 205th Street.	~1.0 mile southeast	Application Filed 7-27-22; CEQA Public Review Period 5-10-24 to 6-10-24; Planning Commission Approved 4-16-25	City of Torrance Major Development List
3	Torrance Gateway North Project	Request for approval of a Conditional Use Permit to allow the construction of two light industrial buildings, in conjunction with an Environmental Assessment, on properties located at 2015 and 2055 190th Street.	~1.7 miles northeast	Application Filed 6-13-23	City of Torrance Major Development List
4	Fashion Square Project	Request for adoption of a Mitigated Negative Declaration, and approval of a Conditional Use Permit, a Development Permit, and a Tentative Tract Map to allow a 260-unit townhome development, in conjunction with a Modification of Variance (V79-3) pertaining to the off-street parking requirement for the Del Amo Fashion Center, and a Modification of Development Permit (DVP96-00001) to modify the Master Plan for the Del Amo Fashion Center, on properties located at 3405 Carson Street and 21405, 21515 Madrona Avenue (APNs 7366-019-123, 7366-019-182, 7366-019-183).	~1.2 miles south	Application Filed 6-15-23; Planning Commission Approved 11-6-24; City Council Approved 12-17-24	City of Torrance Major Development List
5	Link Logistics Project	Request for adoption of a Mitigated Negative Declaration, in conjunction with approval of a Conditional Use Permit to allow the construction of two light industrial buildings measuring 143,933 square feet total, and a Division of Lot to allow a lot line adjustment between two parcels, on properties located at 2421 205th Street.	~0.8 miles southeast	Application Filed 8-29-23	City of Torrance Major Development List
6	Rose Equities Multifamily Residential Project	Request for adoption of a Mitigated Negative Declaration, in conjunction with approval of a Conditional Use Permit to allow the construction of a 272-unit residential condominium development with a density bonus, and a General Plan Amendment from General Commercial to Medium High Density Residential, a Modification of a previously approved Planned Development (PD88-01), a Planned Development to establish development standards for the project, and a Tentative Tract Map for condominium purposes, on property located at 2325 Crenshaw Blvd.	~1.7 miles southeast	Application Filed 9-11-23; Planning Commission Approved 3-30-24; City Council Approved 6-18-24	City of Torrance Major Development List

Map No.	Project Name	Description/Location	Location in Relation to the Proposed Project	Project Status	Source of Project Information
7	Anastasi Development	Request for adoption of a Conditional Use Permit and in conjunction with a Tentative Tract Map to allow the construction of a 50-unit senior housing development on property located at 4501 Torrance Blvd.	~1.3 miles northeast	Application Filed 4-1-24; Planning Commission Approved 11-20-24	City of Torrance Major Development List
8	Sequoia Development Center	Request for approval of a Conditional Use Permit to allow the construction of two light industrial buildings totaling 284,887 square feet, in conjunction with a Tentative Parcel Map to consolidate three parcels into two parcels, and adoption of an Environmental Assessment, on properties located at 2160 190th Street.	~1.5 miles northeast	Application Filed 4-8-24; CEQA Public Review Period 3-6-25 to 4-7-25	City of Torrance Major Development List
9	City Ventures	Request for approval of a Conditional Use Permit, Precise Plan of Development, and Planning Commission Review to allow the construction of a 35-unit townhome development, in conjunction with a Tentative Tract Map for condominium purposes, on properties located at 1407-1455 Crenshaw Boulevard.	~1.1 miles southeast	Application Filed 9-19-24; Planning Commission Approved 3-19-25	City of Torrance Major Development List
10	Pleskow Architects	Request for approval of a Conditional Use Permit and Development Permit to allow a new mixed-use development comprised of 106-apartment units and 12,558 square feet of medical office space, on property located at 3475 Torrance Boulevard.	~0.7 miles south	Application Filed 11-18-24; Planning Commission Approved 6-18-25; City Council Approved 8-19-25	City of Torrance Major Development List
11	Mixed-Use Apartment Development	Request for approval of a Conditional Use Permit and Development Permit to allow a new mixed-use development comprised of 449-apartment units, on property located at 3610 Torrance Boulevard.	~0.9 miles south	Application Filed 12-10-24	City of Torrance Major Development List
12	10-Unit Townhome Development	10-unit townhome development on property located at 3828 226th Street.	~1.9 miles south	Plan check	City of Torrance Major Development List
13	1899 Western Way	New light industrial building measuring 31,160 square feet on property located at 1899 Western Way.	~1.6 miles east	Plan check	City of Torrance Major Development List
14	Automatic Car Wash/Electric Charging (Rove)	Request for approval of an Addendum (EAS22-00004) to the adopted Mitigated Negative Declaration for the 190th Street & Western Avenue Commercial Center Project (State Clearinghouse No. 2022050187), and approval of a Modification (MOD22-00006) of the previously approved Conditional Use Permit (CUP20-00002) to allow site reconfiguration of the commercial center on Parcel 4 from two commercial buildings for retail and restaurant use to one commercial building for retail food market use, one automatic self-service car wash facility, and electric vehicle charging stations, in conjunction with a Conditional Use Permit	~2.0 miles east	Plan check	City of Torrance Major Development List

Map No.	Project Name	Description/Location	Location in Relation to the Proposed Project	Project Status	Source of Project Information
		(CUP22-00019) to allow the automatic self-service car wash facility, on property located in the C-5 Zone at the northwest corner of 190th Street and Western Avenue at 1805, 1811, 1849, 1875 190th Street and 18925, 18999 Western Avenue.			
15	SRG Phase III	Request for approval of a Conditional Use Permit to allow five new light industrial buildings measuring 730,000 square feet total, in conjunction with a Division of Lot to allow a subdivision into five parcels, on property located in the M-2 Zone bounded to the north by 190th Street, to the east by Western Avenue, to the south by 195th Street, and to the west by Gramercy Place.	~1.7 miles east	Plan check	City of Torrance Major Development List

4. ENVIRONMENTAL ANALYSIS

4.1. Air Quality

This section discusses potential air quality impacts associated with the proposed Project's construction, operation, and maintenance, including both regional and site-specific concerns. Project-related air emissions will occur within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

Primary air emissions from proposed Project construction include emissions associated with fugitive dust, heavy construction equipment, portable generators, material and equipment transport trucks, vendor delivery trucks, and construction workers commuting to and from the Project site. Following construction of the proposed Project, operation and maintenance activities would include emissions from vehicles in the use of the Project site for warehousing, distribution, high-cube fulfillment, and high-cube cold storage.

The following discussion is based on the Air Quality Impact Analysis and Health Risk Assessment prepared by Urban Crossroads, Inc. (2024a, and 2025) for the Project and included in Appendices D and L unless otherwise referenced. Trip generation numbers for the Project were calculated by using trip generation rates from the Institute of Transportation Engineers' *Trip Generation Manual* (Institute of Transportation Engineers, 2021), see Section 4.8, Transportation. The proposed Project's potential effects on air quality emissions were evaluated using the criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are discussed in more detail in Section 4.1.3.3, Environmental Impact Analysis. The analysis concludes that the proposed Project impacts associated with air quality emissions would be less than significant.

On April 23, 2025 the SCAQMD provided a scoping comment on the notice of preparation of the Draft EIR for the Prologis Del Amo and Prairie Center Project. The scoping comment recommended relying on the guidance in the SCAQMD CEQA Air Quality Handbook and website, and the use of the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod) to quantify emissions. The SCAQMD Air Quality Handbook was referenced and CalEEMod used for emissions quantification, more information regarding methodology is detailed in Section 4.1.3.1 and in the Applicant's Air Quality Impact Analysis which was independently reviewed by the City and deemed to be acceptable (Urban Crossroads, 2024a; Appendix D).

The SCAQMD recommended using the AQMD's adopted regional air quality significance thresholds and localized significance thresholds. Additionally, the SCAQMD's scoping comment notes that if the proposed Project requires the use of new stationary or portable sources including emergency generators and fire pumps, the role of the air district changes from a Commenting Agency under CEQA to a Responsible Agency, and the assumptions in the air quality analysis will be the basis for evaluating air permit conditions and limits.

The SCAQMD scoping comment letter expressed concern regarding potential adverse public health impacts of siting new warehouses in close proximity to sensitive land uses. To minimize potential impacts of DPM from the proposed Project and to avoid exacerbating existing conditions, the air district suggested evaluating potential health risk impacts to nearby sensitive receptors, and if significant impacts are identified, to include mitigation measures which they identified that would reduce or eliminate DPM health risks to the surrounding community. The results of the conducted operational health risk assessment are discussed in detail in Section 4.1.3.3 under Impact AQ-3.

SCAQMD mentioned operation of the proposed Project would be subject to Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations if the warehouse would potentially be receiving or storing materials sterilized with ethylene oxide (EtO).

4.1.1. Environmental Setting

4.1.1.1. General Site Conditions

The approximately 31.3-acre site is located in the City of Torrance, Los Angeles (LA) County, California. Torrance is located south of the City of Lawndale and Gardena, west of the City of Carson, north of the City of Lomita and Rolling Hills Estates, and east of City of Redondo Beach.

The existing Project site is currently vacant. Historically, the Project site was used as an out-parcel ancillary to the Torrance Oil Refinery for the placement or disposal of refinery wastes, which constitutes a recognized environmental condition. The Refinery is the subject of Cleanup and Abatement Orders from the Los Angeles Regional Water Quality Control Board for releases at and from the Refinery (CAO Numbers 88-43, 89-136, and 95-116) and the Project site is also within the area subject to those orders. As part of the proposed Project, subsequent remediation work will be performed with the oversight of the Los Angeles Regional Water Quality Control Board, as discussed in Section 2.4.1.

Surrounding land uses include commercial and industrial uses to the south and residential use to the west and southwest of the Project site.

4.1.1.2. Ambient Air Quality

The California Air Resources Board (CARB) maintains ambient air monitoring stations for criteria pollutants throughout California. Data from the Southwest LA County monitoring station was used for particulate matter (PM₁₀) (2010). Data from the I-710 Near Road monitoring station was used for nitrogen dioxide (NO₂) and fine particulate matter (PM_{2.5}). South Coastal LA County 4 monitoring station was used for PM₁₀ (2022-2023), and South-Central LA County monitoring station was used for ozone and carbon monoxide (CO).

The most recent three years of data available is shown in Table 4.1-1 and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Project site. Data for ozone, CO, NO₂, PM₁₀, and PM_{2.5} for 2021 through 2023 was obtained from the SCAQMD Air Quality Data Tables (SCAQMD, 2023). Data for sulfur dioxide (SO₂) has been omitted as ambient concentrations are within the applicable standards in the SCAB and few monitoring stations measure SO₂ concentrations.

Table 4.1-1. Criteria Pollutant Ambient Concentration Data in Project Area

Pollutant	Metric	Maximum Concentrations and Frequencies of Exceeded Standards		
		2022	2023	2024
Ozone	Maximum Federal 1-Hour Concentration (ppm)	0.111	0.084	0.087
	Maximum Federal 8-Hour Concentration (ppm)	0.085	0.071	0.064
	Number of Days Exceeding State 1-Hour Standard	1	0	0
	Number of Days Exceeding State/Federal 8-Hour Standard	1	2	0
CO	Maximum Federal 1-Hour Concentration	3.4	3.2	3.5
	Maximum Federal 8-Hour Concentration	3.0	2.6	3.1
NO ₂	Maximum Federal 1-Hour Concentration	0.095	0.071	0.064
	Annual Federal Standard Design Value	0.025	0.021	0.021
PM ₁₀	Maximum Federal 24-Hour Concentration (µg/m ³)	57	80	82
	Annual Federal Arithmetic Mean (µg/m ³)	24.7	21.2	23.1
	Number of Days Exceeding Federal 24-Hour Standard	0	0	0
	Number of Days Exceeding State 24-Hour Standard	2	3	9

Pollutant	Metric	Maximum Concentrations and Frequencies of Exceeded Standards		
		2022	2023	2024
PM2.5	Maximum Federal 24-Hour Concentration ($\mu\text{g}/\text{m}^3$)	39.0	58.3	44.2
	Annual Federal Arithmetic Mean ($\mu\text{g}/\text{m}^3$)	11.91	10.64	11.64
	Number of Days Exceeding Federal 24-Hour Standard	1	1	2

Note: $\mu\text{g}/\text{m}^3$ = microgram(s) per cubic meter; ppm = parts per million (by volume); CO = carbon monoxide; NO₂ = nitrogen dioxide; PM10 = particulate matter; PM2.5 = fine particulate matter
Source: SCAQMD, 2023

Both CARB and the United States (U.S.) Environmental Protection Agency (EPA) use monitoring data to designate attainment status. The three basic designation categories are nonattainment, attainment, and unclassified. Nonattainment is defined as any area that does not meet, or that contributes to, ambient air quality in a nearby area that does not meet the primary or secondary ambient air quality standard for the pollutant. Attainment is defined as any area that meets the primary or secondary ambient air quality standard for the pollutant. Unclassifiable is defined as any area that cannot be classified based on available information as meeting or not meeting the primary or secondary ambient air quality standard for the pollutant. California designations include a subcategory of nonattainment-transitional, which is given to nonattainment areas that are progressing and nearing attainment.

The U.S. EPA currently designates the SCAB as a nonattainment area for ozone, PM2.5 (24-hour standard), and lead. Lead would not be emitted by the proposed Project because neither its construction nor operations would use leaded fuels or handle lead-containing materials; therefore, lead is not a pollutant of concern for this EIR. The U.S. EPA currently classifies the SCAB as extreme nonattainment for the 8-hour ozone national ambient air quality standard (NAAQS) and serious nonattainment for PM2.5 (24-hour standard). The SCAB is in attainment/maintenance of the NAAQS for CO, SO₂, NO₂, and PM10. CARB also designates areas of the state according to whether they meet the California Ambient Air Quality Standards (CAAQS). CARB currently designates the SCAB as a nonattainment area for ozone, PM10, and PM2.5. The air basin is in attainment of the CAAQS for CO, SO₂, lead and sulfates, and is unclassified for hydrogen sulfide and visibility-reducing particles (CARB, 2024). Attainment status for the proposed Project area is summarized in Table 4.1-2. Under the NAAQS, the proposed Project area is currently designated as nonattainment for the ozone and PM2.5 standards, as maintenance for the CO standard, and as attainment or unclassified for the PM10, NO₂, SO₂, and lead standards. Under the CAAQS, the proposed Project area is currently designated as nonattainment for the ozone, PM10, and PM2.5 standards and as attainment or unclassified for all other pollutant standards.

Table 4.1-2. SCAB Criteria Pollutant Attainment Status

Pollutant	CAAQS	NAAQS
Ozone – 1-hour standard	Nonattainment	--
Ozone – 8-hour standard	Nonattainment	Nonattainment
PM10	Nonattainment	Attainment
PM2.5	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO ₂	Attainment	Unclassifiable/Attainment
SO ₂	Attainment	Unclassifiable/Attainment
Lead	Attainment	Unclassifiable/Attainment

Sources: CARB, 2024; EPA, 2024

Note: PM10 = particulate matter; PM2.5 = fine particulate matter; CO = carbon monoxide; NO₂ = nitrogen dioxide; SO₂ = sulfur dioxide

4.1.1.3. Health Effects of Criteria Air Pollutants

Because the CAAQS are set at levels to adequately protect the health of the public, and air quality management agencies have determined that concentrations of ozone and PM10 for the proposed Project area occur at nonattainment levels for the CAAQS, adverse health effects associated with exposure to ozone and PM10 occur as part of the baseline and existing ambient air quality conditions. The following information summarizes the adverse health effects of the criteria air pollutants.

Ozone. Ozone is not directly emitted from stationary or mobile sources but is formed as the result of chemical reactions in the atmosphere between directly emitted volatile organic compounds (VOC) including reactive organic gases (ROG), with oxides of nitrogen (NO_x) in the presence of sunlight. High ozone concentrations can aggravate respiratory and cardio-vascular diseases, irritate eyes, impair cardiopulmonary function, and cause damage to vegetation.

Carbon Monoxide (CO). The highest concentrations of CO occur when low wind speeds and a stable atmosphere trap the pollution emitted at or near ground level. These conditions occur frequently in the wintertime late in the afternoon, persist during the night and may extend one or two hours after sunrise. In the Project area, CO concentrations are well below the CAAQS and NAAQS. CO reduces tolerance from exercise, can cause impairment of mental function and impairment of fetal development, can aggravate some heart diseases (angina), and can cause death at high levels of exposure.

Nitrogen Dioxide (NO₂). Approximately 90 percent of the NO_x emitted from combustion sources is nitric oxide (NO), while the balance is NO₂. NO is oxidized in the atmosphere to NO₂, but some level of photochemical activity is needed for this conversion. The highest concentrations of NO₂ typically occur during the fall. The winter atmospheric conditions can trap emissions near the ground level, but lacking substantial photochemical activity (sunlight), NO₂ levels are relatively low. In the summer, the conversion rates of NO to NO₂ are high, but the relatively high temperatures and windy conditions disperse pollutants, preventing the accumulation of NO₂. The NO₂ concentrations in the Project area are well below the CAAQS and NAAQS. NO₂ can aggravate respiratory diseases, reduce visibility, reduce plant growth, and form acid rain.

Sulfur Dioxide (SO₂). Sulfur dioxide is typically emitted as a result of the combustion of a fuel containing sulfur. Overall SO₂ emissions are limited due to the limited number of major stationary sources and the regulatory limits on motor vehicle fuel sulfur content. The SO₂ concentrations in the Project area are well below the CAAQS and NAAQS. SO₂ can irritate the upper respiratory tract and be injurious to lung tissue causing reduced lung function, including asthma and emphysema. SO₂ can cause plant leaves to be yellow, and be destructive to metals, textiles, leather, finishes, and coatings. SO₂ can also limit visibility.

Particulate Matter (PM10) and Fine Particulate Matter (PM2.5). PM10 can be emitted directly, or it can be formed many miles downwind from emission sources when various precursor pollutants interact in the atmosphere. PM2.5 is derived mainly either from the combustion of materials, or from precursor gases (sulfur oxides [SO_x], ROG, and NO_x) through complex reactions in the atmosphere. PM2.5 consists mostly of sulfates, nitrates, ammonium, elemental carbon, and a small portion of organic and inorganic compounds. Particulate matter can aggravate respiratory diseases, result in reduced lung function, increase and cause chest discomfort, and cause reduced visibility.

4.1.1.4. Toxic Air Contaminants

In addition to the criteria pollutants, the U.S. EPA and California also regulate emissions of hazardous air pollutants (HAPs) and toxic air contaminants (TACs) which are air pollutants that may lead to serious illness or increased mortality, even when present in relatively low concentrations. Potential human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another's. TACs

include airborne inorganic and organic compounds that can have both short-term (acute) and long-term (carcinogenic, chronic, and mutagenic) impacts on human health. TACs do not have ambient air quality standards but are regulated by the local air districts using a risk-based approach. Diesel particulate matter (DPM) is classified as a TAC, and statewide programs focus on managing this pollutant through motor vehicle fuels, engine, and tailpipe standards because many toxic compounds adhere to diesel exhaust particles. California's local air districts support these programs by issuing permits and requiring controls for larger stationary sources of DPM, including diesel powered engines rated over 50 horsepower.

4.1.1.5. Sensitive Receptors

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered more sensitive to poor air quality than the general public, as population groups associated with these uses have increased susceptibility to respiratory distress. Since people generally spend longer periods of time in their residences, these uses are considered more sensitive to air quality conditions than commercial and industrial uses. Recreational land uses are considered moderately sensitive to air pollution since exercise places a high demand on respiratory functions, which can be impaired by air pollution. Existing sensitive receptors in the Project area consist of residences, schools, parks, and workplaces.

Sensitive receptors in the proposed Project area are described below. Localized air quality impacts were evaluated at receptor land uses nearest the proposed Project site.

- R1: Location R1 represents the Staybridge Suites at 20403 Osage Avenue, approximately 202 feet west of the Project site. Receptor R1 is placed at the building façade.
- R2: Location R2 represents the existing multi-family residential home at 3402 Del Amo Boulevard, approximately 203 feet southwest of the Project site. Receptor R2 is placed at the building façade.
- R3: Location R3 represents Delthorne Park, approximately 475 feet southwest of the Project site. Receptor R3 is placed at the park boundary.
- R4: Location R4 represents the existing multi-family residential home at 20404 Osage Avenue, approximately 801 feet southwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R4 is placed at the residential building façade.
- R5: Location R5 represents the Life Covenant Church at 308 Maple Avenue, approximately 159 feet south of the Project site. Receptor R5 is placed at the building façade.
- R6: Location R6 represents North High School, located approximately 4,043 feet northeast of the Project site. Receptor R6 is placed at the athletic field.

4.1.2. Applicable Regulations, Policies, and Standards

4.1.2.1. Federal

The federal Clean Air Act (CAA) establishes the statutory framework for regulation of air quality in the U.S. Pursuant to this act, the U.S. EPA has established various regulations to achieve and maintain acceptable air quality, including the adoption of NAAQS, a mandatory State Implementation Plan (SIP) or maintenance plan requirements to achieve and maintain the NAAQS, and emission standards for both stationary and mobile sources of air pollution. The NAAQS were first established in 1970 for six pollutants: CO, ozone, PM₁₀, PM_{2.5}, NO₂, SO₂, and lead. These pollutants are commonly referred to as criteria pollutants because they are considered the most prevalent air pollutants known to be hazardous to human health. The NAAQS contain primary standards that protect public health and secondary standards that protect public welfare. A summary of the NAAQS and the CAAQS is provided in Table 4.1-3.

Table 4.1-3. National and California Ambient Air Quality Standards

Pollutant	Averaging Time	CAAQS ^[a]	NAAQS ^[b]	
			Primary ^[c]	Secondary ^[d]
Ozone	8 hours	0.070 ppm	0.070 ppm	0.070 ppm
	1 hour	0.09 ppm	N/A	N/A
PM ₁₀	Annual arithmetic mean	20 µg/m ³	N/A	N/A
	24 hours	50 µg/m ³	150 µg/m ³	150 µg/m ³
PM _{2.5}	Annual arithmetic mean	12 µg/m ³ ^[e]	12 µg/m ³	15 µg/m ³
	24 hours	N/A	35 µg/m ³	35 µg/m ³
CO	8 hours	9 ppm	9 ppm	N/A
	1 hour	20 ppm	35 ppm	N/A
NO ₂	Annual arithmetic mean	0.03 ppm	0.053 ppm	0.053 ppm
	1 hour	0.18 ppm	0.100 ppm	N/A
	24 hours	0.04 ppm	N/A	N/A
SO ₂	3 hours	N/A	N/A	0.5 ppm
	1 hour	0.25 ppm	0.075 ppm ^[f]	N/A
Lead ^[f]	Calendar quarter	N/A	1.5 µg/m ³ (certain areas)	1.5 µg/m ³
	Rolling 3 month average	N/A	0.15 µg/m ³	N/A
	30 day average	1.5 µg/m ³	N/A	N/A
Visibility reducing particles	8 hours	N/A ^[g]	N/A	N/A
Sulfates	24 hours	25 µg/m ³	N/A	N/A
Hydrogen sulfide	1 hour	0.03 ppm	N/A	N/A
Vinyl chloride ^[h]	24 hours	0.01 ppm	N/A	N/A

Notes:

^[a] CAAQS for ozone, CO, SO₂ (1 hour and 24 hour), NO₂, and suspended particulate matter (PM₁₀, PM_{2.5}, and visibility-reducing particles) are not to be exceeded. All others are not to be equaled or exceeded.

^[b] NAAQS other than ozone, particulate matter, and those based on annual averages or annual arithmetic means are not to be exceeded more than once per year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. For PM₁₀, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration greater than 150 µg/m³ is equal to or less than 1. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, is equal to or less than the standard.

^[c] NAAQS Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

^[d] NAAQS Secondary Standards: The levels of air quality necessary to protect the public welfare from known or anticipated adverse effects of a pollutant.

^[e] The EPA recently adopted a lower annual PM_{2.5} standard of 9 µg/m³, which took effect on May 6, 2024.

^[f] Final rule signed June 2, 2010. To attain this standard, the 3-year average of the 99th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 75 parts per billion.

^[g] In 1989, CARB converted the general statewide 10-mile visibility standard to instrumental equivalents, which is "extinction of 0.23 per kilometer".

^[h] CARB has identified lead and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. CARB made this determination following the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

N/A = No standard exists for this pollutant averaging period; µg/m³ = microgram(s) per cubic meter; ppm = parts per million (by volume); PM₁₀ = particulate matter; PM_{2.5} = fine particulate matter; CO = carbon monoxide; NO₂ = nitrogen dioxide; SO₂ = sulfur dioxide

Source: CARB, 2016

4.1.2.2. State

California Clean Air Act and Air Quality Standards

CARB is the state agency responsible for California air quality management, including establishment of CAAQS, mobile source emission standards, and greenhouse gas (GHG) regulations, as well as oversight of regional air quality districts and preparation of implementation plans, including regulations for stationary sources of air pollution. Except for the 1-hour NO₂ and SO₂ standards, the CAAQS generally are more stringent and include more pollutants than the NAAQS (refer to Table 4.1-3). California specifies four additional criteria pollutants: visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to the U.S. EPA, CARB designates counties in California as being in attainment or nonattainment for the CAAQS.

The California CAA, which was approved in 1988, requires each local air district, where ambient concentrations violate the CAAQS, to prepare an air quality management plan to achieve compliance with the CAAQS as a part of the SIP. CARB has ultimate responsibility for the SIP for nonattainment pollutants but relies on each local air district to adopt mandatory statewide programs and provide additional strategies for sources under its jurisdiction. The SIPs are a compilation of new and previously submitted plans, programs (monitoring, modeling, and permitting), district rules, state regulations, and federal controls. Local air districts and other agencies prepare SIP elements and submit them to CARB for approval. CARB forwards SIP revisions to the U.S. EPA for approval and publication in the Federal Register.

Air Toxics

California's Air Toxic "Hot Spots" Information and Assessment Act (Assembly Bill [AB] 2588), enacted in 1987, identifies TAC hot spots where emissions from specific sources may expose individuals to an elevated risk of adverse health effects, particularly cancer or reproductive harm. TACs are also referred to as HAPs. AB 2588 requires that a business or other establishment identified as a significant source of toxic emissions provide the affected population with information about health risks posed by the emissions. Diesel particulate matter is the primary TAC emitted by construction activities.

CARB has adopted the Diesel Risk Reduction Plan (CARB, 2000) and a series of airborne toxic control measures (ATCMs) for mobile and stationary sources, which are intended to reduce overall diesel exhaust emissions in California. CARB also has adopted ATCMs for controlling naturally occurring asbestos. CARB and local air districts have authority to enforce the federal National Emission Standards for Hazardous Air Pollutants regulations for asbestos. Key ATCMs and CARB regulations relevant to the Project are described as follows:

- ATCM for DPM from Portable Engines Rated at 50 Horsepower and Greater. To reduce DPM emissions throughout the state, CARB has established the ATCM for DPM from Portable Engines Rated at 50 Horsepower and Greater (13 California Code of Regulations [CCR] Section 93116). This ATCM requires portable diesel-fueled engines having a maximum rating of 50 horsepower (hp) and greater to meet fleet-average DPM emissions standards.
- ATCM to Limit Diesel-Fueled Commercial Motor Vehicle Idling. CARB has established the ATCM to Limit Diesel-Fueled Commercial Motor Vehicle Idling to reduce public exposure to DPM and other pollutants by establishing idling restrictions, emission standards, and other requirements for heavy-duty diesel engines (13 CCR Section 2485). This ATCM applies to diesel-fueled commercial motor vehicles with a gross vehicle weight rating greater than 10,000 pounds that are licensed for operation on highways. Under this ATCM, vehicles will not idle for more than 5 consecutive minutes in any location. There are also provisions for alternative idle reduction technologies, such as internal combustion engine auxiliary power systems, including required compliance with emissions performance specifications.

- Regulation for In-Use Off-Road Diesel-Fueled Fleets. CARB has established the Regulation for In-Use Off-Road Diesel-Fueled Fleets to reduce NOx, DPM, and other criteria pollutant emissions from in-use off-road diesel-fueled vehicles (13 CCR Section 2449). This regulation applies to all self-propelled off-road diesel vehicles rated 25 hp or greater, including vehicles that are rented or leased, and requires restricted vehicle idling time, reporting of vehicle use, and compliance with fleet-average emission standards. It also provides a schedule by which lower-tiered engines cannot be added to a vehicle fleet.
- Statewide Portable Equipment Registration Program (PERP). Voluntary registration under the Statewide PERP allows owners or operators of portable engines to operate their equipment throughout California without having to obtain individual air district permits (13 CCR Sections 2450 through 2465). Diesel engines eligible for PERP registration must not be self-propelling, must be certified to Tier 4 emissions standards, and must not reside in the same location longer than 12 consecutive months. Examples of portable equipment include generators, plate compactors, drills, and welders.
- Asbestos ATCM for Construction, Grading, Quarrying, and Surface-Mining Operations. CARB has established the Asbestos ATCM for Construction, Grading, Quarrying, and Surface-Mining Operations to minimize the generation of asbestos from earth disturbance or construction activities (13 CCR Section 93105). The Asbestos ATCM applies to any project that will include sites to be disturbed in a geographic ultramafic rock unit area or an area where naturally occurring asbestos (NOA), serpentine, or ultramafic rocks are determined to be present. The Asbestos ATCM establishes notification, management practices, mitigation plans, transport and disposal, and administrative (recordkeeping and reporting) requirements for subject projects to reduce the generation of asbestos from all aspects of construction, grading, quarrying, and mining operations. The Project is neither located in an area where NOA has historically been encountered (Department of Conservation, 2000), nor is it expected based on the known types of soil in the Project vicinity. If NOA is encountered during construction, the Project will comply with the requirements of the Asbestos ATCM.

4.1.2.3. Regional

South Coast Air Quality Management District

The SCAQMD maintains air quality conditions in the SCAB through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of the SCAQMD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution. SCAQMD also inspects stationary sources of air pollution and responds to citizen complaints; monitors ambient air quality and meteorological conditions; and implements programs and regulations required by the federal and California CAA.

Air Quality Management Plan

SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing an air quality management plan (AQMP), which addresses federal and California CAA requirements. The AQMP details goals, policies, and programs for improving air quality in the SCAB.

SCAG is mandated by law to develop a long-term regional transportation and sustainability plan every four years. In December 2022, the SCAQMD released the Final 2022 AQMP, which builds upon measures already in place from previous AQMPs and continues to assess current integrated strategies and control measures to meet the NAAQS (SCAQMD, 2022). It includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 federal 8-hour ozone standard. These methods include utilizing

incentive programs, recognizing co-benefit programs from other sectors, and developing a strategy for fair-share reductions at federal, state, and local levels. SCAQMD proposes a total of 49 control measures for the 2022 AQMP, including control measures focused on widespread deployment of zero-emission and low-NOx technologies, through a combination of regulatory approaches and incentives. The 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), a planning document that integrates land use and transportation to help the region meet federal CAA requirements.

SCAQMD Rules and Regulations

All projects are subject to SCAQMD rules and regulations. Specific rules applicable to the proposed Project likely include the following:

Rule 203 – Permit to Operate. A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202. The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate. Permit requirements and the procedures for issuing construction and operation permits are defined in SCAQMD Regulation II.

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. SCAQMD Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of standard best management practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour (mph), sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires project applicants to control fugitive dust using the best available control measures such that dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating an off-site nuisance. Applicable Rule 403 dust suppression (and PM10 generation) techniques to reduce impacts on nearby sensitive receptors may include, but are not limited to, the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more),
- Water active sites at least three times daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving,
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114,

- Reduce traffic speeds on all unpaved roads to 15 mph or less,
- Suspend all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph,
- Provide bumper strips or similar best management practices where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip,
- Replant disturbed areas as soon as practical,
- Sweep on-site streets (and off-site streets if silt is carried to adjacent public thoroughfares) to reduce the amount of PM on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

Rule 1108 – Cutback Asphalt. This rule governs the sale, use, and manufacturing of asphalt and limits the VOC content in asphalt used in the SCAB. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the Project must comply with SCAQMD Rule 1108.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in Rule 1113.

Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations. Rule 1405 outlines requirements applicable to large warehouses that receive EtO-sterilized products. Warehouse operators are required to provide records and emissions data through fenceline monitoring or emissions studies to help assess EtO emissions from warehouses. Rule 1405 is intended to minimize EtO emissions from these sources to protect public health, particularly in nearby communities that may be vulnerable to toxic air contaminants. Some of these requirements include:

- The owner or operator of a Tier I Warehouse or Tier II Warehouse shall record each month according to the dates specified in Table 2 – Warehouse Recording Period, the number of Sterilized Palletized Units received from any entity performing Sterilization.
- The owner or operator of a Tier I Warehouse shall either:
 - (A) Implement a Fenceline Air Monitoring Plan pursuant to subdivision (p);
 - (B) Conduct an emission study pursuant to paragraph (h)(5) and the approved Emission Study Plan;
 - (C) No later than May 29, 2024, fund and participate in a real-time fenceline air monitoring demonstration program by the South Coast AQMD to monitor in real-time ambient Ethylene Oxide concentrations near Tier I Warehouse property boundaries and meet the following requirements:
 - (i) Submit payment to the South Coast AQMD pursuant to the payment schedule in Appendix 2 – Mobile Monitoring Fee and Program Fund for funding a real-time fenceline air monitoring demonstration program;
 - (ii) Provide access for South Coast AQMD personnel and its contractors; and
 - (iii) Provide for each real-time monitor an appropriate location to operate and the infrastructure to operate; or
 - (D) Not receive Sterilized Palletized Units between April 1, 2024 to March 31, 2025 from any entity performing sterilization.

Rule 2305 – Warehouse Indirect Source Rule. The SCAQMD adopted Rule 2305, the Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, on May 7, 2021. WAIRE is an indirect source rule that regulates warehouse facilities to reduce emissions from the goods movement industry. Warehouses 100,000 square feet (sf) or larger are required to directly reduce NO_x and PM emissions, or to otherwise

facilitate emission and exposure reductions of these pollutants in nearby communities. NO_x and PM reductions would be realized with implementation of zero-emission and/or near-zero emissions trucks, solar panels, and electric vehicle chargers. Rule 316 (Fees for Rule 2035) provides authority for the SCAQMD to establish fees to fund Rule 2305 compliance activities; these fees are paid by owners and operators of facilities subject to Rule 2305 and allow the SCAQMD to recover the cost of implementing Rule 2305.

4.1.2.4. Local

City of Torrance General Plan

In 2010, the City of Torrance adopted its General Plan, which includes the following applicable goals and policies in the Community Resources Element that were designed to improve air quality in Torrance (Torrance, 2010):

- **OBJECTIVE CR.13:** To contribute to the improvement of local and regional ambient air quality to benefit the health of all.
 - Policy CR.13.1: Continue to participate in the efforts of the CARB and the SCAQMD to meet State and federal air quality standards.
 - Policy CR.13.2: Work with neighboring cities to implement local and regional projects that improve mobility on freeways and railways, reduce emissions, and improve air quality.
 - Policy CR.13.3: Support regional air quality goals through conscientious land use and transportation planning and the implementation of resource conservation measures.
 - Policy CR.13.4: Balance the achievement of clean air with other major goals of the City.
 - Policy CR.13.5: Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling.
 - Policy CR.13.6: Promote citizen awareness and participation in programs to reduce air pollution and traffic congestion.
 - Policy CR.13.7: Encourage the use of alternative fuel vehicles and re-refined oil.
 - Policy CR.13.8: Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality.

4.1.3. Environmental Impacts Analysis and Mitigation

4.1.3.1. Impact Analysis Approach

Short-term construction emissions of ROG, CO, NO_x, PM₁₀, PM_{2.5}, and SO₂ were evaluated. Construction emissions from off-road construction equipment, portable generators, and fugitive dust were estimated using the methodologies and emission factors described in the California Emissions Estimator Model (CalEEMod v.2022) User's Guide (CAPCOA, 2022). On-road vehicle emissions were estimated using the methodologies described in the CalEEMod User's Guide (CAPCOA, 2022). Construction of the proposed Project is anticipated to occur during a 35-month period, and was modeled as occurring from October 2025 to October 2027.⁸

⁸ It is assumed that all construction activities are assumed to occur after Project approval, and these dates do not represent the actual construction dates, however, the duration of construction remains accurate. This schedule represents a "conservative" analysis scenario because the emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines.

Construction activities associated with the proposed Project include:

- Clearing
- Earthwork
- Export/Remediation
- Import
- Rough Grading
- Vertical Construction
- Site Work Fine Grading
- Building Construction
- Paving
- Architectural Coating

Further information regarding construction schedule, equipment used during construction, vehicle trips, and earthwork, is found in the Applicant's Air Quality Impact Analysis which was independently reviewed by the City and deemed to be acceptable (Urban Crossroads, 2024a; Appendix D).

Operation and maintenance emissions of ROG, CO, NO_x, PM₁₀, PM_{2.5}, and SO₂ were also evaluated using CalEEMod and the methodologies described in the CalEEMod User's Guide. Operational emissions include six main categories: area source emissions, energy source emissions, mobile source emissions, stationary source emissions, transportation refrigeration units, and on-site cargo equipment emissions.

4.1.3.2. Significance Criteria

Project impacts related to air quality were evaluated against the CEQA significance criteria and are discussed in the following sections. The impact analysis evaluates potential proposed Project impacts during the construction phase and the operation and maintenance phase. The significance criteria listed below are based on Appendix G of the CEQA Guidelines.

Would the proposed Project:

- AQ-1: Conflict with or obstruct implementation of an applicable air quality plan?
- AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- AQ-3: Expose sensitive receptors to substantial pollutant concentrations?
- AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

According to Section 15002(g) of the CEQA Guidelines, "a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project." As stated in Section 15064(b) of the CEQA Guidelines, the significance of an activity may vary with the setting. Per Appendix G of the CEQA Guidelines, the potential significance of Project-related impacts on air quality were evaluated for each of the criteria listed above.

The CEQA Guidelines state that the significance criteria established by the air quality management or air pollution control district may be relied on to make impact determinations. The SCAQMD provides air quality emissions thresholds for VOC, NO_x, CO, SO₂, PM₁₀ and PM_{2.5} for evaluating the regional significance of project emissions. Localized impacts may be evaluated using emissions mass rate thresholds or by modeling the concentrations of air pollutants against ambient air quality thresholds.

Table 4.1-4 shows the regional and local significance thresholds for the proposed Project area.

Table 4.1-4. Regional and Local Significance Thresholds for Project Area

Air Pollutant	Construction	Operation
Regional Significance Threshold (lbs/day)		
VOC	75	55
NO _x	100	55
CO	550	550

Air Pollutant	Construction	Operation
SOx	150	150
PM10	150	150
PM2.5	55	55
Lead	3	3
Ambient Air Quality Threshold		
NOX	0.18 ppm	0.18 ppm
CO (1-hour average)	20 ppm	20 ppm
CO (8-hour average)	9 ppm	9 ppm
PM10	10.4 µg/m ³	2.5 µg/m ³
PM2.5	10.4 µg/m ³	2.5 µg/m ³

Source: SCAQMD, 2023

Note: VOC= volatile organic compounds; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM10 = particulate matter; PM2.5 = fine particulate matter; lbs/day = pounds per day; µg/m³ = microgram(s) per cubic meter; ppm = parts per million (by volume)

4.1.3.3. Environmental Impact Analysis

As described in Section 2, Project Description, the proposed Project would include developing a Class A industrial warehouse building, including 15,000 square feet of office space on 31.3 acres of currently vacant land. The proposed building would include 56 dock doors on the northeastern portion of the building. The proposed Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. The proposed Project also includes future road improvements (including installation of a sewer line) along Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court, totaling an additional 7.79 acres.

There are two primary categories of air quality impacts that would occur as a result of the proposed Project. The first category would be impacts associated with Project construction, including the use of construction equipment on the Project site, and off-site construction traffic on roadways providing access to the Project site. During construction activities, a number of vehicles would be traveling to and from the Project site, including trucks delivering materials to the Project site, trucks transporting waste material away from the site, and construction workers' vehicles commuting to and from the Project site.

The second category of air quality impacts would be the impacts associated with operation and maintenance of the proposed Project after construction is complete. Since the future occupants of the building are currently unknown, the HRA analysis evaluated both Option 1 – Single Tenant Building and Option 2 – Multi-Tenant Building. The only difference between the two scenarios is truck trip distribution, which is why the HRA analysis is the only component that is affected. The HRA results between Option 1 and Option 2 had similar results, and only differed in residential receptor maximum incremental cancer risk. The more conservative of which, Option 2, is reported in this EIR.

Impact AQ-1: Conflict with or obstruct implementation of an applicable air quality plan.

Construction

LESS THAN SIGNIFICANT. The proposed Project would comply with all applicable federal, state, and local regulations. Since the regional air regulations and rules are developed to ensure the implementation of the regional air quality plans, compliance with these regulations indicates that the Project's activities would not obstruct implementation of the air quality plans of the region. Construction emissions for the proposed Project would be localized and cease after the approximately 35-month construction period. Additionally, construction would be required to follow all applicable rules and regulations, and the

construction workforce would not contribute to permanent population or employment growth in the area because of the temporary nature of construction activities, as well as the availability of a construction workforce within nearby communities that would reduce the need for relocation to the Project area.

The proposed Project site is located within the SCAB under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. CAAQS and NAAQS violations would occur if localized significance thresholds (LSTs) or regional significance thresholds were exceeded. As shown in Table 4.1-5 and Table 4.1-7 under Impact AQ-2, the proposed Project's regional and localized construction-source emissions would not exceed applicable regional significance thresholds and LSTs. The proposed Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Therefore, the proposed Project would not conflict with or obstruct implementation of the applicable air quality plan and impacts during construction would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT. CAAQS and NAAQS violations would occur if regional significance thresholds or LSTs were exceeded. As shown in Table 4.1-6 and Table 4.1-9 under Impact AQ-2, operational emissions from proposed Project activities would not exceed applicable regional or localized thresholds.

In regard to growth projections, the General Plan Land Use designation of the Project Site is "Heavy Industrial" (HI). The proposed Project consists of an industrial development totaling 403,033 square feet with the 362,730 square feet of High-Cube Fulfillment Center (90% of the total square footage) and 40,303 square feet of High-Cube Cold Storage Warehouse (10% of the total square footage). The proposed uses by the Project are permitted and no General Plan Land Use Amendment or Zone Change would be required to implement the Project. The proposed Project would also be required to follow Rule 2305 – Warehouse Indirect Source Rule and directly reduce NO_x and PM by implementing EV chargers, and would be required to follow Rule 316, which provides authority for the SCAQMD to establish fees paid for by the owners and operators of facilities subject to Rule 2305 to fund the compliance of Rule 2305. Although not expected, if the proposed Project were to receive any units sterilized with ethylene oxide, it would be required to follow the requirements for Tier I Warehouses in Rule 1405. Since the proposed use of the Project site is consistent with the General Plan Land Use Designation for the site, and as the Project's construction and operational source air pollutant emissions would not exceed the regional significance thresholds or LSTs, the proposed Project's impacts are determined to be less than significant.

Impact AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Construction

LESS THAN SIGNIFICANT. The estimated emissions include offroad construction equipment, on road vehicles including worker commuter vehicles, material and equipment transport trucks, vendor delivery trucks, construction support vehicles, and fugitive dust associated with earth-moving activities and vehicle travel on paved and unpaved roads. Construction is expected to occur at one time and would take approximately 35 months. Table 3-1, Construction Schedule, in Section 2 represents the duration of construction activity for each construction phase. The duration and associated equipment shown represent a reasonable approximation of the expected construction fleet as required. The estimated off-road construction equipment to be used is shown in Section 2, Table 3-2, Construction Equipment Fleet.

The grading plan indicates that the Project's grading operation would excavate approximately 49,200 cubic yards of cut and require approximately 340,700 cubic yards of fill. The Project would require approximately 292,000 cubic yards of imported soil. Approximately 5,000 cubic yards of export would be required

during remediation. The proposed Project was conservatively assumed to include installation of one 300-horsepower diesel-powered fire pump and one 700-horsepower diesel-powered emergency generator at the industrial building. The fire pump and emergency generator were estimated to operate for up to 1 hour per day, 1 day per week for up to 50 hours per year for maintenance and testing purposes. Emissions associated with the stationary diesel-powered emergency fire pump and emergency generator were calculated using CalEEMod, and further details can be found in the Applicant's Del Amo Technology Center Air Quality Impact Analysis prepared by Urban Crossroads, Inc., which was independently reviewed and verified by the City (Urban Crossroads, 2024a; Appendix D).

Table 4.1-5. Maximum Daily Construction Emissions

Year	Maximum Daily Construction Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
2025	2.11	48.50	65.15	0.12	6.61	3.60
2026	3.31	78.73	99.98	0.24	11.23	3.89
2027	61.33	15.64	34.68	0.05	2.98	1.07
Maximum Daily Emissions	67.07	78.73	99.98	0.24	11.23	3.89
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Note: lbs/day = pounds per day; VOC= volatile organic compounds; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM10 = particulate matter; PM2.5 = fine particulate matter; SCAQMD = South Coast Air Quality Management District
Source: Urban Crossroads, 2024a (Appendix D)

Construction emissions would be lower than the SCAQMD regional thresholds for all criteria pollutants, and as such impacts would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT. The Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. The Project proposes 477 standard automobile parking stalls including 96 electric vehicle (EV) capable spaces without electric vehicle supply equipment (EVSE), 48 electric vehicle charging station (EVCS) spaces, 23 clean air spaces, and 316 trailer parking stalls (12 feet x 55 feet). The anticipated volumes of traffic that would be generated by each component of the Project were calculated by using trip generation rates from the Institute of Transportation Engineers' *Trip Generation Manual* (Institute of Transportation Engineers, 2021). Traffic generation is used for the purpose of analyzing impacts related to air quality, greenhouse gas emissions, energy, and noise. The proposed Project is anticipated to generate a total of 2,424 actual vehicle trip-ends per day with 318 AM peak hour trips and 439 PM peak hour trips. Additionally, it was conservatively assumed that the proposed Project would include installation of one 300-hp diesel-powered fire pump and one 700-hp diesel-powered emergency generator. Emissions were calculated using CalEEMod, and further details can be found in the Applicant's Del Amo Technology Center Air Quality Impact Analysis prepared by Urban Crossroads, Inc., which was independently reviewed and verified by the City (Urban Crossroads, 2024a; Appendix D).

Table 4.1-6. Maximum Daily Operation Emissions

Year	Maximum Daily Operation Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Mobile Source	7.30	12.32	69.25	0.22	17.60	4.62
Area Source	12.16	0.15	17.53	0.00	0.03	0.02
Stationary Source	1.64	4.59	4.18	0.01	0.24	0.24

Year	Maximum Daily Operation Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
TRU Source	4.63	4.83	0.47	0.00	0.16	0.15
On-Site Equipment Source	0.23	0.75	32.89	0.00	0.06	0.05
Total Maximum Daily Emissions	25.97	22.49	124.33	0.23	18.09	5.09
SCAQMD Regional Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Note: lbs/day = pounds per day; VOC= volatile organic compounds; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM10 = particulate matter; PM2.5 = fine particulate matter; TRU = transport refrigeration units; SCAQMD = South Coast Air Quality Management District
Source: Urban Crossroads, 2024a (Appendix D)

Operation and maintenance emissions would be lower than the SCAQMD regional thresholds for all criteria pollutants, and as such impacts would be less than significant.

Impact AQ-3: Expose sensitive receptors to substantial pollutant concentrations.

Construction

LESS THAN SIGNIFICANT. This discussion is based on a screening-level health risk assessment (HRA) that was completed for the proposed Project and a criteria pollutant ambient impact analysis, as discussed in the following paragraphs.

Health Risk Assessment Analysis

Project emissions of TACs could result in increased off-site health risks to nearby residences and workers. The method for characterizing this impact is a screening-level HRA that uses the results of Project-specific air dispersion modeling to determine potential off-site risk levels. This analysis considers the potential for the proposed Project to expose sensitive receptors to DPM concentrations as the primary driver of potential cancer and non-cancer health impacts. Construction would require the use of diesel-powered trucks and off-road equipment. These trucks and equipment would be sources of toxic DPM during the short-term period of construction. The emissions calculations for the construction HRA component are presented in the Del Amo Technology Center Health Risk Assessment Report prepared by Urban Crossroads, Inc. based on an assumed mix of construction equipment and hauling activity as presented in the Del Amo Technology Center Air Quality Impact Analysis prepared by Urban Crossroads (Urban Crossroads, 2024a; Appendix D).

The nearest residential receptors are described in Section 4.1.1.5. The land use with the greatest potential exposure to proposed Project construction-source DPM emissions is Location R2 which is located approximately 202 feet southwest of the Project site at the residence on 3402 Del Amo Boulevard. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to proposed Project construction-source DPM emissions was estimated at 1.24 in one million, which is less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be less than 0.01, which would not exceed the applicable threshold of 1.0. Although Location R1 is not the nearest receptor to the proposed Project site, it would experience the highest concentrations of DPM during proposed Project construction due to its location and the meteorological conditions at the site. Because all other modeled receptors would experience lower concentrations of DPM during Project construction, all other receptors in the vicinity of the proposed Project would be exposed to less emissions and therefore less risk than the MEIR. Impacts would be less than significant.

Criteria Pollutant Ambient Impact Analysis

Construction and operational emissions of criteria air pollutants from the proposed Project may be compared with SCAQMD's LSTs to screen whether emissions during construction or operation could occur at a level that could cause significant adverse localized air pollutant concentrations. Peak daily construction emissions were evaluated using Project-specific air dispersion modeling to determine potential concentrations occurring in the vicinity of the site, and the modeled concentrations are compared to the ambient air quality impact thresholds are shown in Table 4.1-7.

Table 4.1-7. Peak Construction Localized Significance Summary

Air Pollutant	CO (ppm)		NO ₂ (ppm)	PM10 (µg/m³)	PM2.5 (µg/m³)
	Averaging Time				
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Concentrations	0.04	0.02	2.12E-02	0.73	0.37
Background Concentration	4.3	3.7	0.095	--	--
Total Concentration	4.34	3.72	0.12	0.73	0.37
SCAQMD Ambient Air Quality Impact Threshold	20	9	0.18	10.4	10.4
Threshold Exceeded?	No	No	No	No	No

Notes: Background concentration is the highest concentration from last three years of available data.

CO = carbon monoxide; NO₂ = nitrogen dioxide; PM10 = particulate matter; PM2.5 = fine particulate matter; µg/m³ = microgram(s) per cubic meter; SCAQMD = South Coast Air Quality Management District

Source: Urban Crossroads, 2024a (Appendix D); SCAQMD, 2008

Table 4.1-7 shows that the concentrations of all construction emissions would be below the SCAQMD ambient air quality impact thresholds, and as such, impacts would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT. In order to account for the possibility of refrigerated uses, trucks associated with the high-cube cold storage land use are assumed to also have transport refrigeration units (TRUs). Therefore, for modeling purposes, 30 trucks (15 two-way truck trips per day) were modeled with the potential to include TRUs. TRUs were accounted for during on-site and off-site travel. The TRU calculations were based on CARB's OFFROAD Model version 2021 (OFFROAD2021). It was conservatively assumed that the proposed Project would include installation of one 300-hp diesel-powered fire pump and one 700-hp diesel-powered emergency generator. The emergency generator and fire pump would be diesel fueled and potentially would result in exposure of sensitive receptors to DPM. The analysis assumed that the emergency generator and fire pump could potentially operate for up to one hour per day, one day per week, for a total of 50 hours per year for maintenance and testing purposes. The emergency generator and fire pump would be required to obtain permits from the SCAQMD and would be limited to emergency use and the permitted maintenance and testing hours, which would not exceed one hour per day, one day per week, and 50 hours per year. In accordance with the SCAQMD, the emergency backup generator would not operate more than 200 hours a year, and would only be operated in the event of an emergency power failure, or for routine testing and maintenance. Consistent with SCAQMD guidance, the emergency generator and fire pump were modeled as point sources. Further details regarding the analysis are found in the Del Amo Technology Center Health Risk Assessment Report (Urban Crossroads, 2025; Appendix L).

Health Risk Assessment Analysis

Increased TAC emissions during Project operations could affect public health. The primary emitters of TACs would be the proposed sources of DPM, including truck movement, truck idling activity, cold storage dock idling activity, a diesel-powered fire pump, and an emergency generator. Stationary sources of TACs would be subject to risk screening during the air permit review. SCAQMD Rule 1401, New Source Review

of Toxic Air Contaminants, establishes limits for the Maximum Individual Cancer Risk, cancer burden, and non-cancer acute and Chronic Hazard Index from new sources and it also requires the installation of emissions controls to ensure that permitted sources would not expose receptors to significant levels of TACs.

Table 4.1-8 summarizes the maximum incremental cancer risks for the worst-case receptors near the Project site.

Table 4.1-8. Incremental Health Impacts of Toxic Air Contaminants – Project Operation

	Residential Receptor	Worker Receptor	School Child Receptor
Maximum Incremental Cancer Risk	0.93 in one million	0.10 in one million	0.01 in one million
SCAQMD Thresholds	10 in one million	1.0 in one million	10 in one million
Exceeds Threshold?	No	No	No

Note: SCAQMD = South Coast Air Quality Management District

Source: Urban Crossroads, 2024a (Appendix D), Urban Crossroads, 2025 (Appendix L)

Based on the results of dispersion modeling and risk assessment for operation-phase DPM emissions, the operation activities of the proposed Project would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant.

Criteria Pollutant Ambient Impact Analysis

The proposed Project would result in long-term emissions of criteria air pollutants associated with the operation of the warehouse building. To determine the impact to off-site ambient air pollutant concentrations, the operational emissions from vehicles travelling to and from the Project site were included in the dispersion modeling analysis to determine whether concentrations would exceed the SCAQMD ambient air quality impact significance thresholds. The maximum daily concentrations were derived from emission rates for operation of the proposed Project shown in Table 4.1-6 including both on-site emissions and emissions from off-site activities including employees commuting and all vehicles involved in warehouse operations in the total.

Table 4.1-9. Peak Operations Localized Significance Summary

Air Pollutant	CO (ppm)		NO ₂ (ppm)	PM10 (µg/m ³)	PM2.5 (µg/m ³)
			Averaging Time		
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Concentrations	7.67E-02	6.05E-02	2.00E-03	0.19	0.10
Background Concentration	4.3	3.7	0.095	--	--
Total Concentration	4.38	3.76	0.10	0.19	0.10
SCAQMD Ambient Air Quality Impact Threshold	20	9	0.18	2.5	2.5
Threshold Exceeded?	No	No	No	No	No

Notes: Background concentration is the highest concentration from last three years of available data.

CO = carbon monoxide; NO₂ = nitrogen dioxide; PM10 = particulate matter; PM2.5 = fine particulate matter; µg/m³ = microgram(s) per cubic meter; SCAQMD = South Coast Air Quality Management District

Source: Urban Crossroads, 2024a (Appendix D); SCAQMD, 2008

Table 4.1-9 shows that the concentrations of all operational emissions would be below the SCAQMD ambient air quality impact thresholds, and as such, impacts would be less than significant.

Impact AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Construction

LESS THAN SIGNIFICANT. Construction of the proposed Project would not include any notable source of odors, or other emissions that would adversely affect a substantial number of people. Construction activities involving diesel-powered equipment and vehicles would not be a source of notable odors because of the mandatory use of ultra-low sulfur diesel fuel. Construction related odor emissions would be temporary and intermittent and would cease upon completion of construction. Project-related activities would occur in compliance with local air district rules and regulations prohibiting nuisances, including SCAQMD Rule 402, and would not create objectionable odors affecting a substantial number of people. This impact would be less than significant, and no mitigation is required.

Operations and Maintenance

LESS THAN SIGNIFICANT. Land uses generally associated with emissions leading to adverse odors typically include agricultural uses, landfills, composting operations, wastewater treatment plants, and food and chemical processing plants. The proposed Project does not include any land uses typically associated with objectionable odor emissions. Operation activities involving diesel-powered equipment and vehicles would not be a source of notable odors because of the mandatory use of ultra-low sulfur diesel fuel. Project-related activities would occur in compliance with local air district rules and regulations prohibiting nuisances, including SCAQMD Rule 402, and would not create objectionable odors affecting a substantial number of people. This impact would be less than significant, and no mitigation is required.

4.1.3.4. Mitigation Measures

No mitigation is required.

4.1.4. Cumulative Impact Analysis

Geographic Extent/Context

The geographic extent of the cumulative analysis for air quality includes the SCAB. This geographic scope of analysis is appropriate because the majority of the proposed Project emissions and cumulative projects' emissions would be confined to this region. Table 3-1 in Section 3, Assessment Methodology identifies the locations of each cumulative project in the vicinity of the proposed Project. Projects within the region considered for the cumulative impact analysis include a variety of activities such as housing developments, mixed-use projects, commercial developments, and industrial projects.

Cumulative Impact Analysis

Cumulative air quality impacts would include the effects of the cumulative projects identified Table 3-1 in Section 3, Assessment Methodology. Emissions from cumulative projects would contribute to air quality impacts when cumulative project emissions occur concurrently with those of the proposed Project and near sensitive receptors. The potential for cumulative air quality impacts would be greatest for any sensitive receptors located in close proximity to two or more work sites that are active at the same time.

The analyses of Project impacts for Impacts AQ-1 (implementation of an air quality plan) and AQ-2 (cumulatively considerable net increase of criteria pollutants) are inherently a cumulative analyses for air quality emissions within the SCAB. The analyses consider the cumulative effects of past projects as contributing to existing nonattainment conditions and addresses whether the Project would result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under an applicable federal or state ambient air quality standard. The SCAB is in nonattainment for federal ozone

and PM_{2.5} standards, and nonattainment for state ozone, PM₁₀ and PM_{2.5} standards. The SCAQMD provides project-level thresholds of significance in its CEQA Guidelines for pollutants in which the SCAB is in nonattainment. Construction emissions from the Project would not exceed SCAQMD thresholds, and as such, the incremental contribution of the proposed Project construction emissions to cumulatively significant air quality impacts would not be cumulatively considerable. Additionally, operation and maintenance emissions from the proposed Project would not exceed SCAQMD thresholds, and as such, the incremental contribution of the proposed Project construction emissions to cumulatively significant air quality impacts would not be cumulatively considerable. Impacts AQ-3 (exposure of sensitive receptors) and AQ-4 (other emissions, such as odors) address localized air quality effects that would not combine with other projects to result in cumulatively significant air quality impacts during proposed Project construction or operation and maintenance. No additional mitigation is required.

4.1.5. Summary of Significance Findings

Table 4.1-10 provides a summary of each identified air quality impact. There are no mitigation measures proposed because there are no impacts that are significant. Based on the results of the air quality analysis, emissions from construction and operational of the proposed High-Cube Fulfillment Center and High-Cube Cold Storage Warehouse Project would not exceed applicable SCAQMD significance thresholds.

Table 4.1-10. Summary of Air Quality Resources Impacts and Mitigation Measures

Impacts	Mitigation Measures
Impact AQ-1: Conflict with or obstruct implementation of an applicable air quality plan.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact AQ-3: Expose sensitive receptors to substantial pollutant concentrations.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.

4.2. Biological Resources

This section describes the biological resources present in the Del Amo and Prairie Center Project site, outlines the environmental and regulatory setting for the Project, assesses potential impacts to biological resources, and recommends measures to mitigate these impacts to below a level of significance, as needed.

The following discussion is based on the Biological Technical Report prepared by Glenn Lukos Associates (GLA) (2025) for the Project and included in Appendix E, unless otherwise referenced. The proposed Project's potential effects on biological resources were evaluated using the criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are discussed in more detail in Section 4.2.3.3, Environmental Impact Analysis. The analysis concludes that the proposed Project impacts associated with biological resources would be less than significant with mitigation.

No scoping comments were received regarding biological resources during the public scoping period for the proposed Project.

4.2.1. Environmental Setting

The Project site is located in the City of Torrance in Los Angeles County, California. Torrance lies within the Dominguez Channel Watershed, which encompasses a significant portion of the South Bay region. Historically, the region has supported a mosaic of native grasslands, wildflower fields, coastal dune and bluff scrub, coastal sage scrub, and various wetland habitats (Ethington et al., 2020). However, beginning in the early 20th century, rapid growth within the City of Torrance and the surrounding region transformed the watershed, which is now almost entirely developed with urban land uses dominated by residential, industrial, and commercial infrastructure (City of Los Angeles, 2025; City of Torrance, 2025). The climate of Torrance is characterized by warm, dry summers and mild, wet winters typical of the Mediterranean climate found in coastal Southern California. Average annual rainfall recorded at the Torrance weather station, located approximately 3.1 miles to the south of the site, is 14.45 inches (U.S. Climate Data, 2025). On average, the low and high temperatures in the area range from approximately 46 to 65 degrees Fahrenheit (°F) in the winter to 58 to 78°F in the summer (U.S. Climate Data, 2025).

The Project site is 39.11 acres, which consists of 31.32 acres on-site and 7.79 acres off-site, for road improvements. The 31.32-acre Project site is currently vacant. The other 7.79 acres includes portions of Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court, roads to the west and south of the Project site, which would be improved as part of the Project (see Figure 2-2, Site Map). Surrounding land uses include transportation corridors, rail lines, oil refinery infrastructure, and residential development. The site's elevation is approximately 100 feet above sea level, and it slopes slightly from west to east. The site's soil consists of well-draining sandy loam and loam, derived from older aeolian sand (dune) deposits.⁹ Much of the site exhibits evidence of past disturbances, including a borrow pit situated in the central portion, where soil was previously extracted for use at the adjacent oil refinery. The topography in the central portion of the site is the most variable, featuring depressions and several deeply eroded gullies. In 2025, Prologis conducted non-native tree removal as part of a tree removal plan primarily targeting wattle (*Acacia* spp.) in the western portion of the site.

Biological resources in the Project site were assessed by Glen Lukos Associates (GLA) in spring and summer 2021 and during follow-up visits in 2024 and 2025 (GLA, 2025 [Appendix E]). Aspen Environmental Group also conducted a habitat assessment and site visit in fall 2022. All biological surveys adhered to standard practices, including a detailed review of available literature and databases to identify special-status

⁹ Aeolian sand deposits are accumulations of sand formed and moved by wind, resulting in features like dunes and ripples on landscapes such as deserts and coastlines. These deposits are created by aeolian processes, which involve the transport and deposition of particles, and are characterized by features like cross-bedding within the dunes formed by different wind directions. They are common in arid and semi-arid environments with sparse vegetation, where wind can readily mobilize sand.

biological resources in the vicinity of the Project site, as well as conducting reconnaissance-level surveys, habitat assessments, vegetation mapping, and delineating aquatic resources. Based on this review, lists of special-status plants (Table 4-2, Appendix E) and wildlife (Table 4-3, Appendix E) with potential to occur in the Project site were compiled. Additionally, focused surveys were conducted based on these habitat assessments, including focused surveys for special-status plants, burrowing owl, California legless lizard, and Crotch's bumble bee (see Appendix E). Appendix E, the updated Biological Technical Report (GLA, 2025), details the literature search, survey dates, methodologies used for surveys, and results. The impact analyses and mitigation measures presented herein utilize the Biological Technical Report (GLA, 2025 [Appendix E]) as a basis; however, the impact analyses in this section adopt a more conservative approach and provide additional protection for special-status plants and wildlife in mitigation to ensure that impacts are below the threshold of potential significance.

4.2.1.1. Vegetation and Cover Types

The Project site encompasses various vegetation and land-use categories, including Disturbed/Developed areas, Acacia Ruderal Patches (*Acacia cyclops* Shrubland Semi-Natural Alliance), Deerweed Scrub (*Acmispon glaber* Shrubland Alliance), Ice Plant Mats (*Carpobrotus edulis* Herbaceous Semi-Natural Alliance), Summer Mustard Fields (*Hirschfeldia incana* Herbaceous Semi-Natural Alliance), and Ornamental Planting Areas. Table 4.2-1 offers a comprehensive summary of these vegetation and land-use types. Only one (Deerweed Scrub) of the six Vegetation and Cover types consists of dominant native vegetation, and the remainder are primarily composed of non-native plants. Descriptive details for each category are provided in Appendix E (GLA, 2025) and generally conform to *A Manual of California Vegetation* membership rules, as outlined by Sawyer et al. (2009). Additionally, a Vegetation Map is attached as Exhibit 5 in Appendix E (GLA, 2025). Photographs illustrating the Project site are included in Exhibit 6 of Appendix E (GLA, 2025). No vegetation or land cover types identified by GLA (2025) are considered sensitive natural communities by the California Department of Fish and Wildlife (CDFW).

The California Natural Diversity Database (CNDDB)¹⁰ search identified three special-status vegetation communities in the Torrance and nearby quadrangle maps: Southern Dune Scrub, Southern Coastal Bluff Scrub, and Southern Coastal Salt Marsh. Based on the vegetation descriptions provided by Holland (1986) in comparison with the vegetation types identified at the Project site, no vegetation communities present at the Project correspond to the special-status vegetation types identified by the CNDDB.

Table 4.2-1. Acreage of Vegetation and Land Cover within the Project Site

Vegetation Type	Project Site (Acres)	Off-Site (Acres)	Total (Acres)
Acacia Ruderal Patches (<i>Acacia cyclops</i> Shrubland Semi-Natural Alliance)	--	0.85	0.85
Deerweed Scrub (<i>Acmispon glaber</i> Shrubland Alliance)	0.50	--	0.50
Ice Plant Mats (<i>Carpobrotus edulis</i> Herbaceous Semi-Natural Alliance)	0.11	0.66	0.77
Summer Mustard Fields (<i>Hirschfeldia incana</i> Herbaceous Semi-Natural Alliance)	22.37	0.02	22.39
Other Cover Types			
Disturbed or Developed	7.32	5.86	13.17
Ornamental Planted Areas	1.02	0.41	1.43
Total	31.32	7.79	39.11

Source: GLA, 2025 (Appendix E)

¹⁰ The CNDDB is the official inventory of locations for rare, threatened, and endangered plants, animals, and natural communities in California, maintained by the CDFW.

4.2.1.2. Special-Status Plants

Table 4-2 in Appendix E lists special-status plant species that have the potential to occur in the Project site and summarizes their habitat, distribution, conservation status, and likelihood of occurrence. The following sections provide the main findings from this information.

Listed Threatened or Endangered Plant Species

No federally or state-listed threatened or endangered plants were observed during the field surveys, and none are known to occur within the Project site. Additionally, the Project site does not contain designated critical habitat for any federally listed threatened or endangered plant species.

Other Special-Status Plant Species

CDFW and the California Native Plant Society (CNPS) maintain lists of plants of conservation concern. The CDFW compiles these species, including those ranked by CDFW and CNPS as California Rare Plant Rank (CRPR) 1, 2, 3, or 4,¹¹ in its compendium of “Special Plants” (CDFW, 2025). These plants are treated here as “special-status species.” Two non-listed special-status plants with a CRPR (CNPS, 2025) were detected during the surveys: Southern tarplant (*Centromadia parryi* ssp. *australis*) and Lewis' evening-primrose (*Camissoniopsis lewisii*). These plants are discussed below. Impacts on these species will require appropriate consideration and mitigation. No other special-status plants were observed in the Project site or have the potential to occur.

Southern Tarplant. Southern tarplant has a CRPR of 1B.2¹² and a state rank of S2¹³ (CNPS, 2025). It is an annual herb in the sunflower family (Asteraceae). Southern tarplant is endemic to coastal regions of Southern California and Baja California. It occurs along the margins of marshes and swamps, in vernally mesic grasslands and vernal pools,¹⁴ and within coastal scrub habitats at elevations below 1,600 feet (CNPS, 2025). The blooming period for southern tarplant is between May and November. Within the Project site, this species was mapped in the northwestern portion, as well as the northcentral portion (see Exhibit 8 of Appendix E). Approximately 620 southern tarplant individuals were observed in the western portion of the Project site during field surveys in 2022 by Aspen Environmental Group, and approximately 474 were found by GLA in a subsequent visit in 2024. The number of plants present is expected to change annually based on rainfall and other environmental factors.

Lewis' Evening-Primrose. Lewis' evening-primrose has a CRPR of 3 and a state rank of S4¹⁵ (CNPS, 2025). It is an annual herb in the evening-primrose family (Onagraceae). Lewis' evening-primrose is endemic to coastal Southern California and Baja California, and is known from Los Angeles, Orange, and San Diego counties. It occurs in coastal dunes, bluffs, and scrub communities, as well as in inland habitats such as

¹¹ The CRPR is a system used by the CNPS and CDFW to rank and define the rarity and threat level of native California plants, as follows: CRPR 1 – Includes plants considered rare, threatened, or endangered. This is further divided into 1A (presumed extirpated in California) and 1B (rare, threatened, or endangered both in California and globally); CRPR 2 – Refers to plants that are rare in California but more common elsewhere. This includes 2A (presumed extirpated in California but common elsewhere) and 2B (rare, threatened, or endangered in California but more common outside the state); CRPR 3 – A review list for plants needing more information or those considered taxonomically problematic; and CRPR 4 – A watch list for plants with limited distribution or that are infrequent and require monitoring.

¹² For CRPR 1B.2, the “1” signifies rarity, and the “B” indicates a “rare and uncommon” status. The “.2” classification signifies that management actions are needed to address the threats to the plant.

¹³ A state rank of S2 means a plant species is imperiled within the State and is at high risk of extirpation due to factors like limited range, few populations, severe threats, or recent population declines.

¹⁴ Vernally mesic grasslands are native grasslands with rich, moist soils that support a diverse array of grasses and wildflowers. Vernal pools are a specific type of temporary wetland that forms in shallow depressions within these grasslands. They fill with rainwater in the winter and spring and completely dry up by summer.

¹⁵ A state rank of S4 means the plant species is apparently secure within the State, but there is still some cause for long-term concern.

cismontane woodlands¹⁶ and grasslands at elevations below 1,000 feet (CNPS, 2025). The blooming period for Lewis' evening-primrose is between March and June. Within the Project site, this species is associated with sandy relict coastal dune soils¹⁷ (see Exhibit 8 of Appendix E). Several individual Lewis' evening-primrose were observed in vegetative state during the field surveys in 2022 by Aspen and 305,000 were estimated to be present at the Project site by GLA in a subsequent visit in 2025. The number of plants present is expected to change annually based on rainfall and other environmental factors.

4.2.1.3. Common Wildlife

Common wildlife species found in the Project site include Anna's hummingbird (*Calypte anna*), house finch (*Carpodacus mexicanus*), American crow (*Corvus brachyrhynchos*), rock pigeon (*Columba livia*), California ground squirrel (*Otospermophilus beecheyi*), black phoebe (*Sayornis nigricans*), western fence lizard (*Sceloporus occidentalis*), Botta's pocket gopher (*Thomomys bottae*), side-blotched lizard (*Uta stansburiana*), California harvester ant (*Pogonomyrmex californicus*), and milk snail (*Otala lactea*). A complete list of wildlife species observed during surveys in support of the Project is included in Appendix B of the Biological Technical Report (GLA, 2025 [Appendix E]). Other wildlife species common in developed landscapes throughout the region are also likely to be present but were not observed.

4.2.1.4. Nesting Birds

Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC). The Project site features numerous trees, shrubs, and open spaces that may provide nesting habitats for common birds of the region. Three special-status bird species, burrowing owl (*Athene cunicularia*), Cooper's hawk (*Accipiter cooperii*), and loggerhead shrike (*Lanius ludovicianus*) may nest in portions of the Project site.

4.2.1.5. Special-Status Wildlife

Table 4-3 in Appendix E lists special-status wildlife species that have the potential to occur in the Project site and summarizes their habitat, distribution, conservation status, and likelihood of occurrence. The following sections provide the main findings from this information.

Listed Threatened or Endangered Wildlife Species

Two candidate species for state listing, Crotch's bumble bee (*Bombus crotchii*) and burrowing owl, have the potential to occur in the Project site. No other federal- or state-listed threatened, endangered, or candidate wildlife species were observed or have the potential to be present. There is no designated critical habitat for any federally listed species within the Project site.

Crotch's Bumble Bee. Crotch's bumble bee is a state candidate for listing under the California Endangered Species Act (CESA). Crotch's bumble bee is a widespread but secretive species. It is typically found in openings in grassland and scrub habitats where it burrows into the ground and lives in colonies. It feeds on a variety of common native and non-native plant species, some of which are present within the Project site and surrounding areas. The nearest record of Crotch's bumble bee is less than 2 miles from the Project site in northern Redondo Beach. Foraging habitats (both native and non-native plants) and nesting areas (burrows) are present in the Project site. The results of focused surveys conducted by GLA in 2021 were negative; however, additional surveys conducted by GLA in 2025 led to the identification of Crotch's bumble bee foraging within the Project site on multiple occasions. During these 2025 surveys, one queen was found on April 7, one queen on April 24, three additional queens on April 28, and one worker was

¹⁶ Cismontane woodlands are a Mediterranean ecosystem in California found west of the Sierra Nevada and Transverse-Peninsular crests. Common plant communities include oak woodlands, chaparral, and coastal sage scrub.

¹⁷ Sandy relict coastal dune soils are former coastal dunes that have become "relict," meaning they are no longer actively forming or being shaped by the current processes of wind and waves.

found on May 23, 2025. A map of locations where Crotch's bumble bee was found is shown in Exhibit 9 of Appendix E (GLA, 2025). While GLA biologists detected no evidence of nesting by Crotch's bumble bee, multiple burrows were observed at the site that could serve as future nesting sites for Crotch's bumble bee. GLA (2025) estimates that there are 17.83 acres of suitable habitat present within the Project site.

Burrowing Owl. Burrowing owl are considered a Species of Special Concern by the CDFW and the western burrowing owl subspecies (*Athene cunicularia hypugaea*) is a state candidate for listing under the CESA. All burrowing owls in California are part of the western burrowing owl subspecies but are simply referred to as burrowing owl in this report. It is a small, terrestrial owl of open country. During the breeding season, it ranges throughout most of the western United States (U.S.). It occurs year-round in Southern California. Still, burrowing owls may be more numerous during fall and winter, when migratory individuals from farther north join the regional resident population. Burrowing owls favor flat, open annual or perennial grassland or gentle slopes and sparse shrub or tree cover. It utilizes the burrows of ground squirrels and other rodents for shelter and nesting, and the availability of suitable burrows is a critical component of its habitat. When ground squirrel burrows are unavailable, burrowing owls may use alternative burrow sites or man-made features, such as drainpipes, debris piles, or concrete slabs. In the CNDDDB, the nearest record of western burrowing owl is 9.5 miles from the Project site, at the Ballona Wetlands Ecological Preserve. No western burrowing owls or their sign were observed in the Project site during focused surveys; however, documented observations of suitable burrows were found during surveys by Aspen Environmental Group (Aspen, 2022). The results of focused surveys by GLA in 2021 (breeding), 2024 (non-breeding), and 2025 (breeding) determined that burrowing owls are Absent from the Project site (see Appendix E); nonetheless, suitable nesting habitat (large burrows) is present for this species within the Project site.

Other Special-Status Wildlife Species

In addition to federal- or state-listed threatened, endangered, or candidate wildlife species, the U.S. Fish and Wildlife Service (USFWS) and the CDFW have several non-listed designations for special-status wildlife. These include species designated as California fully protected, CDFW Species of Special Concern, CDFW Watch List, or CDFW Special Animal, as well as federal designations such as Bird of Conservation Concern and species protected under the Bald and Golden Eagle Protection Act. Three special-status wildlife species were detected during field surveys in support of the Project: Cooper's Hawk, a CDFW Watch List species; and two CDFW Species of Special Concern, loggerhead shrike, and Southern California legless lizard (*Anniella stebbinsi*). No other special-status wildlife species were detected during field surveys or have the potential to be present in the Project site.

Coopers Hawk. Cooper's hawk is a CDFW Watch List species. It is a wide-ranging species that is known to occur in mature forests, open woodlands, woodland edges, river groves, and urban environments. It nests in coniferous, deciduous, or mixed woodlands, or urban areas, typically those with tall trees and nearby openings or edge habitats. Nest sites are usually chosen within trees, located approximately 20 to 50 feet above the ground. The species is found year-round in California. The diet of Cooper's hawks consists primarily of small mammals, such as squirrels and bats, and medium-sized birds such as mourning doves and quail (Kennedy, 1980). A Cooper's hawk was observed flying overhead during field surveys in support of the Project in 2021 (GLA, 2025). As the Project site provides suitable foraging habitat, Cooper's hawks may utilize the area for foraging; however, nesting is unlikely due to the absence of suitable nest sites for the species.

Loggerhead Shrike. Loggerhead shrike is a CDFW Species of Special Concern. It is a wide-ranging species that forages in a variety of open habitats, including agricultural fields and shrublands, where it uses perch sites at least two feet off the ground to scan for potential prey (CDFW, 2025). Loggerhead shrikes feed on insects and small vertebrates such as lizards and snakes, often impaling prey on barbed wire or other sharp objects. Loggerhead shrikes typically nest in dense vegetation within trees or shrubs, but are also known to use low-lying vegetation, such as Russian thistle, when preferred nesting sites are unavailable.

Loggerhead shrike was observed perched in the north-central portion of the Project site and was likely foraging in 2021, but the species was not observed subsequently in surveys in 2021, 2024, and 2025 (GLA, 2025). Since suitable nesting and foraging habitats are present, loggerhead shrikes have the potential to nest in the Project site.

Southern California Legless Lizard. Southern California legless lizard is a CDFW Species of Special Concern. It is one of four species of legless lizards recently split from a single taxon (Papenfuss and Parham, 2013). Southern California legless lizards occur from coastal Southern California, with disjunct populations extending inland into the Transverse and Peninsular Ranges, as well as the southern Mojave and western Colorado Deserts (Papenfuss and Parham, 2013). Southern California legless lizards inhabit areas of friable soil in sandy washes, alluvial fans,¹⁸ oak woodlands, and dunes or in otherwise sandy habitats near the coast (CDFW, 2025). This species is primarily fossorial (adapted to living underground, often by digging a burrow and/or tunnels), and most specimens have been collected under cover, such as rocks or debris, or more commonly during excavations (Klauber, 1932). While they are typically found occupying the first one to four inches of soil or litter, they have been detected at much lower depths in relatively loose and moist soils (Miller, 1944). Southern California legless lizards require moderate soil moisture and are typically limited by non-native vegetation, which can reduce soil moisture and overall habitat suitability. Fifteen Southern California legless lizards were detected during focused surveys in support of the Project in 2021 (GLA, 2025 [Appendix E]), and an additional six were detected and mapped in 2025 (see Exhibit 10 of Appendix E). Approximately 6.76 acres of habitat, distributed in disjunct patches on the Project site, appear to be occupied by Southern California legless lizards. These areas are characterized by small relict patches of native vegetation and are isolated from one another by extensive, continuous swaths of non-native vegetation. Based on habitat suitability and the results from soil moisture testing and focused surveys, the remainder of the Project site is not expected to support the Southern California legless lizard.

4.2.1.6. Wildlife Movement

The ability for wildlife to move freely among populations is essential to long-term genetic variation and demography. Fragmentation and isolation of natural habitats can lead to the loss of native species diversity in these fragmented habitats. In the short term, wildlife movement may also be necessary for individual animals to occupy their home ranges if their ranges extend across a potential movement barrier. These considerations are crucial for rare, threatened, or endangered species, as well as wide-ranging species such as large mammals, which often exist in low population densities.

The California Essential Habitat Connectivity Project was commissioned by the California Department of Transportation (Caltrans) and CDFW to create a statewide assessment of essential habitat connectivity to be used for conservation and infrastructure planning (Caltrans and CDFW, 2010). One of its goals was to create the Essential Connectivity Map, which depicts large, relatively natural habitat blocks that support native biodiversity (natural landscape blocks) and areas essential for ecological connectivity between them (essential connectivity areas). The Project site is not located within any Essential Habitat Connectivity Areas or Natural Landscape Blocks. The nearest Natural Landscape Block and Essential Connectivity Area are located approximately 19 miles northwest of the Project site at the Puente Hills Mountains, and 26 miles northwest of the Project site in the Santa Monica Mountains, respectively. The Project site largely lacks native vegetation, has been subject to continuous disturbance for over a century, and is surrounded by urban development with no direct connection to natural landscapes or open space. Given its condition, the site is unlikely to support regional wildlife movement or contribute meaningfully to landscape connectivity.

¹⁸ An alluvial fan is a fan-shaped deposit of sediment formed when flowing water carrying rock and soil emerges from a narrow canyon or mountain pass onto an open plain, losing its velocity and dropping its load of alluvium. Alluvium is a deposit of sand, mud, clay, gravel, and other sedimentary material that has been transported and deposited by running water, such as a river or stream.

4.2.1.7. Jurisdictional Waters and Wetlands

No jurisdictional waters, wetlands, or riparian habitat subject to the jurisdiction of state or federal agencies were identified within the Project site. Appendix E, Biological Technical Report (GLA, 2025), outlines the methods and rationale used to support this finding.

4.2.2. Applicable Regulations, Policies, and Standards

4.2.2.1. Federal

Federal Endangered Species Act

The federal Endangered Species Act (ESA), as amended, protects plants and wildlife (and their habitats) that are listed as Endangered or Threatened by the USFWS and the National Marine Fisheries Service. Section 9 of the ESA specifically prohibits the taking of ESA-protected wildlife and lists prohibited actions. The ESA defines take as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct” (50 Code of Federal Regulations [CFR] 17.3). The ESA also governs the removal, possession, malicious damage, or destruction of endangered plants on federal land. Pursuant to the requirements of the ESA, an agency proposing a project or reviewing a proposed project within its jurisdiction (action agency) must determine whether any federally listed species may be present in the study area and determine whether the proposed project will have a significant effect upon such species or its habitat. The action agency is also encouraged to determine whether the project is likely to jeopardize any proposed or candidate species to avert any potential future conflict.

The Department of the Interior, on April 17, 2025, put forth a proposed rule titled "Rescinding the Definition of 'Harm' Under the Endangered Species Act" (DOI, 2025a). If this rule is finalized, it would eliminate the existing definition of "Harm," which would have significant negative consequences for endangered species, including the loss of protection for their critical habitats. This proposed change is already facing legal challenges, and it has not yet been implemented as a final rule.

Migratory Bird Treaty Act

The MBTA implements international treaties between the U.S. and other nations to protect migratory birds and their parts, eggs, and nests from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized by regulation or permit. Regulations governing migratory bird permits are found in 50 CFR 13, General Permit Procedures and 50 CFR 21, Migratory Bird Permits.

On April 11, 2025, the Department of the Interior (DOI, 2025b) reissued a memo that reinstates the 2017 Trump administration's interpretation of the MBTA. This interpretation specifically excludes the accidental or incidental killing of birds from its protections. It is worth noting that this 2017 interpretation is currently involved in legal disputes and does not cover intentional take, only referring to unintentional or accidental harm to birds. Additionally, it is noted that pursuant to Assembly Bill (AB) 454 (2025), the State of California modified the CFGC, adding Section 3513, which includes the protection of birds previously protected under the pre-2017 MBTA designations.

Bald and Golden Eagle Protection Act

The Bald Eagle Protection Act of 1940 (16 United States Code [U.S.C.] 668, enacted by 54 Statute 250) protects bald and golden eagles by prohibiting the taking, possession, and commerce of such birds. It establishes civil penalties for violation of this Act. Take of bald and golden eagles is defined as follows: “disturb means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment,

by substantially interfering with normal breeding, feeding, or sheltering behavior” (72 Federal Register [FR] 31132; 50 CFR 22.3).

The USFWS is the primary federal authority charged with the management of bald and golden eagles in the U.S. USFWS guidance on the applicability of current Eagle Act statutes and mitigation is currently under review. On November 10, 2009, the USFWS implemented new rules (74 FR 46835) governing the “take” of golden and bald eagles. The new rules were released under the existing Bald and Golden Eagle Act, which has been the primary regulation protecting unlisted eagle populations since 1940. All activities that may disturb or incidentally take an eagle or its nest because of an otherwise legal activity must be permitted by the USFWS under this act.

Section 404 of the Clean Water Act

Section 404 of the Clean Water Act (CWA) regulates the discharge of dredged material, placement of fill material, or certain types of excavation within “waters of the U.S.” (resulting in more than incidental fallback of material) and authorizes the Secretary of the Army, through the Chief of Engineers, to issue permits for such actions. Permits can be issued for individual projects (individual permits) or general categories of projects (general permits). The definition of federally jurisdictional wetlands and “Waters of the U.S.” has changed several times recently, and the latest interpretation of the CWA is discussed below.

In 2020, the U.S. Environmental Protection Agency (EPA) updated the CWA and its definition of navigable waters (USACE and EPA, 2020). The Navigable Waters Protection Rule (NWPR) revised the definition of “Waters of the U.S.” to encompass traditional navigable waters; perennial and intermittent tributaries that contribute surface waters flow to such waters; certain lakes, ponds, and impoundments of jurisdictional waters; and wetlands adjacent to other jurisdictional waters. Ephemeral waters were not included in the NWPR definition of “Waters of the U.S.” In 2021, the EPA and U.S. Army Corps of Engineers (USACE) were directed by the Biden Administration and the U.S. District Court to vacate the 2020 NWPR and revert to the pre-2020 rule. On January 18, 2023, the EPA published the “Revised Definition of ‘Waters of the United States’” (the January 2023 Rule), with a definition of “Waters of the U.S.” that reutilized the 2006 Rapanos ruling’s permanent and significant nexus standards.

On May 25, 2023, the U.S. Supreme Court decision in *Sackett v. Environmental Protection Agency* concluded that the significant nexus standard is inconsistent with the CWA. On August 29, 2023, the USACE and EPA issued a prepublication of the final rule to amend the January 2023 Rule and define “Waters of the U.S.” as follows, once again not including ephemeral waters:

- Traditional navigable waters, the territorial seas, and interstate waters (referred to as “(a)(1) waters”).
- Impoundments of “Waters of the U.S.,” other than impoundments of waters identified under paragraph (a)(5) (referred to as “(a)(2) waters”).
- Tributaries to traditional navigable waters, the territorial seas, and interstate waters that are relatively permanent, standing or continuously flowing bodies of water (referred to as “(a)(3) waters” or “jurisdictional tributaries”).
- Wetlands adjacent to and having a continuous surface connection with (a)(1) waters or relatively permanent, standing or continuously flowing (a)(2) waters (referred to as “jurisdictional adjacent wetlands”).
- Intrastate lakes and ponds not identified as (a)(1) through (4) waters that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to (a)(1) or (a)(3) waters.

On March 12, 2025, USACE and the EPA released a memo clarifying their interpretation of “continuous surface connection.” This term is derived from the 2023 Conforming Rule and is key to determining what falls under the CWA. The memo states that for an Adjacent Wetland or Relatively Permanent Water to be

subject to CWA jurisdiction, it must directly border waters already defined as jurisdictional. The USACE and EPA also indicated they will publish a notice in the Federal Register, titled "WOTUS Notice: The Final Response to SCOTUS," to provide further details on future implementation (USACE and EPA, 2025)

4.2.2.2. State

California Fish and Game Code §§ 2050-2098: California Endangered Species Act

The CESA of 1984 states that all native species of fish, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected and preserved. CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. The CDFW may authorize the take of any such species if certain conditions are met. These criteria are listed in Title 14 of the California Code of Regulations (CCR), Section 783.4 subdivisions (a) and (b). For purposes of CESA, "take" means to hunt, pursue, catch, capture, or kill (CFGF § 86). The administering agency is CDFW.

Porter Cologne Water Quality Control Act and Section 401 of the Clean Water Act

The Regional Water Quality Control Board (RWQCB) regulates activities affecting "Waters of the State" according to the Porter-Cologne Water Quality Control Act and Section 401 of the federal CWA. The Porter-Cologne Act defines waters of the State as all surface and subsurface waters (Water Code § 13050[e]), including all waters of the U.S. (23 CCR § 3831[w]). The RWQCBs may issue permits, known as Waste Discharge Requirements (WDRs), or may grant a waiver for a specific application. Additionally, the RWQCB has recently begun implementing a new regulatory program for all waters within the State. The Plan site is within the jurisdictional boundaries of the Los Angeles RWQCB.

On April 2, 2019, the State Water Resources Control Board (SWRCB) adopted a State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State. Waters of the State are typically delineated based on the Ordinary High-Water Mark (OHWM) in the field, as defined by federal guidelines (SWRCB, 2021; see also USACE, 2008), which serves as the limits of jurisdiction. However, waters of the State include isolated waters and do not need to have a downstream surface connection to federally jurisdictional waters. The adopted definition and procedures allow for the presence of hydric substrates as a criterion for wetland identification (not just wetland soils) and wetland hydrology for an area devoid of vegetation (less than 5% cover) to be considered a wetland. Based on these criteria, certain unvegetated sites (e.g., mud flats or playas) may be defined as wetlands based on only the soils and hydrology criteria. "Waters of the State" include the following wetland types under the adopted definition:

1. Natural wetlands,
2. Wetlands created by modification of a surface water of the state,
3. Artificial wetlands meeting the following criteria:
 - a. Approved by an agency as compensatory mitigation for impacts to other waters of the State, except where the mitigation is explicitly identified as being of limited duration,
 - b. Specifically identified in a water quality control plan as a wetland or other water of the State,
 - c. Resulted from historic human activity, is not subject to ongoing operation and maintenance, and has become a relatively permanent part of the natural landscape,
 - d. Greater than or equal to one acre in size, unless it was constructed, and is currently used and maintained, primarily for the following purposes: industrial or municipal wastewater treatment or disposal; sediment settling; management (e.g., detention, infiltration, etc.) of stormwater runoff and other pollutants as part of a stormwater permitting program; surface water treatment;

agricultural irrigation or stock watering; fire suppression; industrial processing or cooling; or active surface mining.

The State Definition and Procedures states that an artificial wetland less than one acre in size that does not satisfy the criteria defined in definitions 2, 3.a., 3.b., or 3.c. is not a water of the State.

Section 401 of the CWA requires that:

...any applicant for a Federal permit for activities that involve a discharge to “waters of the State,” shall provide the Federal permitting agency a certification from the State in which the discharge is proposed that states that the discharge will comply with the applicable provisions under the Federal Clean Water Act.

Therefore, before the USACE may issue a Section 404 permit, a permittee must apply for and receive a Section 401 Water Quality Certification from the RWQCB. The RWQCB may add conditions to their certification to remove or mitigate potential impacts to water quality standards.

Section 1602 of the California Fish and Game Code

Section 1602 of the CFGC requires any person, state or local governmental agency, or public utility to first notify the CDFW of any proposed project that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake, or use materials from a streambed, or result in the disposal or deposition of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into any river, stream, or lake. Notification is generally required for any project that will take place in a river, stream, lake, or its tributaries. This includes rivers or streams that flow at least periodically or permanently through a bed or channel with banks that support fish or other aquatic life and watercourses having a surface or subsurface flow that supports or has supported riparian vegetation. CDFW may also exert jurisdiction over storm drains or concrete channels that convey flows from one jurisdictional feature to another. Based on the notification materials submitted, the CDFW will determine if a proposed project may impact fish or wildlife resources.

If the CDFW determines that a proposed project may substantially adversely affect existing fish or wildlife resources, a Lake or Streambed Alteration Agreement (SAA) will be required. A completed CEQA document must be submitted to CDFW before an SAA will be issued.

Sections 3511, 4700, 5050, 5515, and 2081.15 of the California Fish and Game Code: Fully Protected Species

Sections of the CFGC cover birds (section 3511), mammals (section 4700), amphibians and reptiles (section 5050), and fish (section 5515), as “Fully Protected” or “Species of Special Concern.” Section 3511 details that “fully protected birds” shall not be taken at any time, except for scientific research (excluding mitigation for a project) or related to the protection of livestock, and any authorized take of a fully protected bird requires a published notification in the California Regulatory Notice Register. Section 4700 (mammals), 5050 (amphibians), and 5515 (fish) similarly do not allow for the take of “fully protected” species without a published notice. Section 2081.15 outlines permit requirements for the incidental take of “fully protected” species for certain types of projects, including requirements for monitoring and adaptive management planning to minimize and mitigate the potential impacts of such take.

Sections 3503 and 3513 of the California Fish and Game Code, as amended (2025): Migratory and Non-Game Bird Protections

Under Section 3503 of the CFGC, it is illegal to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 specifically affords protection for birds of the orders Falconiformes and Strigiformes (birds of prey). Additionally, Section 3513 prohibits the taking or possession of any migratory non-game bird, and as modified under AB 454 (2025), also includes protection of migratory birds previously

protected under the pre-2017 MBTA designations regardless of non-game status. The CDFW considers a disturbance that results in nest abandonment or loss of reproductive effort to constitute a "take."

4.2.2.3. Local or Regional

There are no local regulations, policies, or ordinances concerning biological resources applicable to the Project. The City of Torrance does not maintain a list of protected trees or a tree preservation policy, and the Project site is not located within any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.2.3. Environmental Impacts Analysis and Mitigation

4.2.3.1. Impact Analysis Approach

This section assesses the Project's potential direct and indirect effects on biological resources and outlines feasible mitigation measures to minimize these impacts to levels that are less than significant. The impact analysis is based on the biological resources literature review and field survey efforts described above and the Project Description in Section 2.

A significant impact is defined under CEQA as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project" (State CEQA Guidelines Section 15382). The State CEQA Guidelines define direct impacts as those impacts that result from a project and occur simultaneously and at the same location. Indirect impacts are caused by a project but may occur later in time or are farther removed in distance and are still reasonably foreseeable and related to the project's operation.

4.2.3.2. Significance Criteria

Project impacts related to biological resources were evaluated against the CEQA significance criteria and are discussed in the following sections. The impact analysis evaluates potential proposed Project impacts during the construction phase and the operation and maintenance phase. The significance criteria listed below are based on Appendix G of the CEQA Guidelines.

Would the proposed Project:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

4.2.3.3. Environmental Impact Analysis

As described in Section 2, Project Description, the proposed Project would include developing a Class A industrial warehouse building, including 15,000 square feet of office space on 31.3 acres of currently vacant land. The proposed Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. The proposed Project also includes future road improvements (including installation of a sewer line) along Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court, totaling an additional 7.79 acres.

There are two primary categories of biological resources impacts that would occur as a result of the proposed Project. The first category would be impacts associated with Project construction, including site mobilization, vegetation removal, grading, habitat loss and fragmentation, increases in non-native species, displacement, artificial lighting, and noise and vibration from heavy equipment. The second category of biological resources impacts would be the impacts associated with operation and maintenance of the proposed Project after construction is complete.

Impact BIO-1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Construction

LESS THAN SIGNIFICANT WITH MITIGATION. The Project site, although currently vacant, has historically been used as an outparcel for the disposal of refinery waste, requiring remediation in accordance with Los Angeles RWQCB requirements before development. Although the Project site is disturbed, it still provides habitat for sensitive species, as discussed below. Species and habitat disturbance during construction would be a significant impact without mitigation. Therefore, Mitigation Measures (MM) BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1g (discussed in Section 4.2.3.3 below, and listed in Section 4.2.3.4) would be required to avoid and minimize adverse effects on special-status species. With the incorporation of these measures, impacts would be less than significant.

Impact BIO-1a. Sensitive Plant Species. Both southern tarplant and Lewis' evening primrose were determined to be present on the Project site. Impacts include the removal of individual plants from grading and vegetation removal, as well as permanent habitat loss, further habitat fragmentation, increased non-native species, soil degradation, water pollution, and impacts to pollinator species. Impacts to Lewis' evening primrose do not need to be evaluated under CEQA due to its rank as a CRPR 3 species.¹⁹ Implementation of mitigation measure MM-BIO-1a, which requires mitigation at a no-net-loss ratio of 1:1 for southern tarplant would be necessary to reduce impacts to a less-than-significant level.

Impact BIO-1b. Nesting Birds. The Project site contains vegetation and burrows that provide suitable habitat for nesting birds. Vegetation within the Project site has the potential to provide nesting habitat for species protected under CFGC Sections 3503, 3503.5, and 3513, and the MBTA. Construction activities, such as site mobilization, vegetation removal, grading, artificial lighting, and noise and vibration from heavy equipment, have the potential to cause significant direct (e.g., mortality or physical injury) or indirect (e.g., nest abandonment) impacts on nesting birds. The destruction of an active nest, eggs, or young of any common or special-status avian species as a result of Project construction would constitute a violation of CFGC Sections 3503, 3503.5, and 3513, and the MBTA. Implementation of MM BIO-1b, which requires avoidance of active nests, would be necessary to reduce impacts to nesting birds to a less-than-significant level.

¹⁹ CRPR 3 includes plants that are on a review list for plants needing more information or those considered taxonomically problematic. This ranking means that there is insufficient information to determine the plant's rarity or endangerment level.

Impact BIO-1c. Crotch's Bumble Bee. This species was detected in the Project site, and approximately 17.83 acres of suitable habitat for this species are present in the Project site. Despite the lack of detection of nesting at the site, there is potential for Crotch's bumble bee to occur and nest at the site. Possible impacts to Crotch's bumble bee may include direct take of nests in burrows or individuals during construction activities, including those described for nesting birds above, as well as permanent habitat loss, further habitat fragmentation, removal of nectar sources required for foraging, increases in non-native species, and destruction of overwintering and nesting sites. Implementation of MM BIO-1c, which requires avoidance surveys for Crotch's bumble bee and proposed Incidental Take Permitting, would be necessary to reduce impacts to Crotch's bumble bee to a less-than-significant level.

Impact BIO-1d. Burrowing Owl. Although focused surveys for burrowing owl determined that this species was absent in 2021 and 2025, suitable habitat for this species is present in the Project site. This species is known to occur in the vicinity and could potentially encroach on the Project site at any time, utilizing it for nesting or foraging purposes. Project activities could have a similar impact to Impact BIO-1b, affecting burrowing owls in a manner similar to that addressed for nesting birds, discussed above. Additionally, since burrowing owls are fossorial in nature, nesting sites could be ambiguous and require species-specific surveys (see MM BIO-1d) to avoid potential impacts. With the incorporation of MM BIO-1b, which includes consideration of all nesting bird species, along with species-focused survey and avoidance requirements in MM BIO-1d, potential impacts to burrowing owls would be less than significant.

Impact BIO-1e. Cooper's Hawk. Due to numerous known occurrences of Cooper's hawk in the vicinity, and the presence of native vegetation and adjacent buildings that provide suitable nesting areas, this species could occur at the Project site during construction. Like Impact BIO-1b, Cooper's hawks could be similarly impacted by the Project as nesting birds, as described above. With the incorporation of MM BIO-1b, which considers all nesting bird species, the potential impacts to Cooper's hawks are expected to be less than significant.

Impact BIO-1f. Loggerhead Shrike. Due to numerous known occurrences of loggerhead shrike in the vicinity, and the presence of native vegetation and adjacent buildings that provide suitable nesting areas, this species could occur at the Project site during construction. Like Impact BIO-1b, loggerhead shrikes could be similarly impacted by the project as nesting birds, as described above. With the incorporation of MM BIO-1b, which considers all nesting bird species, the potential impacts on loggerhead shrikes are expected to be less than significant.

Impact BIO-1g. California Legless Lizard. The California legless lizard was determined by GLA (2025) to be present, occupying approximately 6.76 acres of habitat within the Project site. Surveys in 2021 detected 15 individuals, and an additional six were observed in 2025 (GLA, 2025). Impacts may include direct take on habitat and individuals during construction activities, including those described for nesting birds above, as well as permanent habitat loss, further habitat fragmentation, increases in non-native species, and displacement. At a minimum, surveys and relocation efforts would be required to minimize the impacts on these individuals; however, as the Project site is surrounded by development, this also corresponds to the removal of an isolated population. The construction of the Project would eliminate approximately 6.76 acres of occupied habitat. With the incorporation of MM BIO-1e, which includes translocation and preservation of habitat for the California legless lizard at a no-net-loss ratio of 1:1, the potential impacts on the California legless lizard are expected to be less than significant.

Operations and Maintenance

NO IMPACT. During the operations and maintenance phase of the Project, it is not likely that any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS would be present within the Project site, as development of the Project would effectively remove all suitable habitat. During the operations and maintenance phase, no potential significant impacts are anticipated; therefore, no mitigation is required.

Impact BIO-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Construction

NO IMPACT. No critical habitat is mapped at the Project site. No Sensitive Natural Communities were detected in the Project area during any of the site visits. The construction of the Project would not have a substantial adverse effect on riparian vegetation or sensitive natural communities, and no potential significant impacts are anticipated; therefore, no mitigation is required.

Operations and Maintenance

NO IMPACT. No critical habitat is mapped at the Project site. No sensitive natural communities were detected within the Project site during any site visit. After construction of the Project, there would be no actions as part of operations and maintenance that would have a substantial adverse effect on riparian vegetation or sensitive natural communities, and no potential significant impacts are anticipated; therefore, no mitigation is required.

Impact BIO-3: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Construction

NO IMPACT. During the delineation of jurisdictional features on the Project site, no federal or state jurisdictional features, wetlands, or riparian habitats were identified. Furthermore, the Project site lacks natural vegetation communities. The construction of the Project would not have a substantial adverse effect on state or federally protected wetlands, and no potential significant impacts are anticipated; therefore, no mitigation is required.

Operations and Maintenance

NO IMPACT. During the delineation of jurisdictional features on the Project site, no federal or state jurisdictional features, wetlands, or riparian habitats were identified. Furthermore, the project site lacks natural vegetation communities. After construction of the Project, there would be no actions as part of operations and maintenance that would remove, fill, interrupt or otherwise adversely affect state or federally protected wetlands, and no potential significant impacts are anticipated; therefore, no mitigation is required.

Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Construction

LESS THAN SIGNIFICANT WITH MITIGATION. The Project site is not located within any Essential Habitat Connectivity Area or Natural Landscape Block (Caltrans and CDFW, 2010), and it is not located within any area that may be considered a wildlife corridor or nursery. The Project site is surrounded by commercial, industrial, and residential development with no connections to natural open space. The site is disturbed and lacks natural vegetation communities. Project construction would also not impede the use of any wildlife nurseries (such as rookeries, spawning areas, roosts, or other colonial breeding sites), as none occur within the Project site. Additionally, the construction of the Project would not interfere with wildlife movement corridors, as the Project site is not part of a wildlife corridor and is unlikely to contribute to localized wildlife movement due to its geographic position within the built environment. However, the presence of

shrubs and open areas in the Project site may provide suitable foraging habitat for local wildlife as well as nesting habitat for common bird species. Numerous common bird species are known to nest in the region and are likely to nest within the Project site. Therefore, Project construction could interfere substantially with the movement of migratory birds and wildlife as a result of habitat and species disturbance, which would be a significant impact without mitigation. MM BIO-1b, as discussed above, would be implemented to require avoidance of active nests during construction. With the incorporation of MM-BIO-1b, the Project would limit the potential for impacts to migratory birds and wildlife that may use vegetation as a nesting or nursery site, resulting in a less-than-significant impact.

Operations and Maintenance

NO IMPACT. After Project construction, the site would be highly disturbed and is unlikely to support most of the needs of most wildlife species, and suitable nesting sites for birds would be significantly reduced. Additionally, the operation and maintenance of the Project would not impede the use of any wildlife nurseries, such as rookeries, spawning areas, roosts, or other colonial breeding sites, as none are located within the Project site. Therefore, no impacts would occur, and no mitigation is required.

Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Construction

NO IMPACT. There are no local regulations, policies, or ordinances concerning biological resources in the City of Torrance. The City of Torrance does not maintain a list of protected trees or a tree preservation policy. Therefore, the construction of the Project would not conflict with any local policies or ordinances that protect biological resources. No impacts would occur, and no mitigation is required.

Operations and Maintenance

NO IMPACT. There are no local regulations, policies, or ordinances concerning biological resources in the City of Torrance. The City of Torrance does not maintain a list of protected trees or a tree preservation policy. Therefore, the operations and maintenance of the Project would not conflict with any local policies or ordinances related to the protection of biological resources. No impacts would occur, and no mitigation is required.

Impact BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Construction

NO IMPACT. The Project site is not located within any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, construction of the Project would not conflict with the provisions of any of these plans. No impacts would occur, and no mitigation is required.

Operations and Maintenance

NO IMPACT. The Project site is not located within any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan area. Therefore, the operations and maintenance of the Project would not conflict with the provisions of any of these plans. No impacts would occur, and no mitigation is required.

4.2.3.4. Mitigation Measures

Mitigation Measures for Impact BIO-1a (Sensitive Plant Species)

BIO-1a **Mitigation for Southern Tarplant.** The Applicant shall collect seed from southern tarplant from the Project site for dispersal to a translocation site to be approved by the City of Torrance. Possible receiver sites may include Madrona Marsh or other sites with existing southern tarplant populations that can be enhanced or where suitable habitat conditions exist such that southern tarplant can be introduced. A qualified biologist will assess the potential receiver site(s) and, once a candidate site is identified, will determine what if any site preparation would be needed prior to the broadcast of seed. Preparation might include the removal of non-native vegetation and performing potential soil treatments, including scarification, to improve habitat conditions at the site. Prior to the implementation of ground-disturbing activities, a Southern Tarplant Translocation Plan will be prepared. The plan will outline seed collection procedures, site preparation (including non-native vegetation treatment), translocation methods, and monitoring requirements.

Mitigation Measures for Impact BIO-1b (Nesting Birds)

BIO-1b **Protection and Avoidance Surveys for Nesting Birds.** Vegetation clearing, if feasible, will be conducted outside of the nesting season (February 1 through September 15). If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior any disturbance of the site, including disking, demolition activities, and grading. The qualified biologist shall possess at least 2 years of experience in Southern California ecosystems and be able to identify and locate bird nests in both urban and natural environments. The survey must encompass both the Project site and adjacent areas that activities could affect, either indirectly (e.g., construction noise or lighting) or directly (e.g., ground disturbance or dust). If an active nest is found, a qualified biologist shall establish a suitable disturbance buffer around it using flagging or staking. Construction must not occur within these buffer zones until the biologist determines the nest is inactive. Ongoing nest monitoring at least weekly throughout construction is required to ensure buffers remain intact and are respected, and to update the nest's status. The buffer shall be removed only by the qualified biologist, and work is allowed to proceed in that area once the qualified biologist confirms the nest is no longer active.

Mitigation Measures for Impact BIO-1c (Crotch's Bumble Bee)

BIO-1c **Protection and Avoidance Surveys for Crotch's Bumble Bees.** Prior to any ground disturbance of the Project site, the Applicant shall consult with CDFW to determine whether avoidance and minimization measures are feasible to avoid "take" of Crotch's bumble bee individuals. If "take" avoidance is determined to be infeasible, then the Applicant shall obtain an Incidental Take Permit (ITP) from CDFW.

The loss of up to 17.83 acres of Crotch's bumble bee habitat will be mitigated through the enhancement of offsite lands with potential to support Crotch's bumble bee. The proposed mitigation lands can be lands that are already conserved and will be enhanced specifically to improve Crotch's bumble bee uses, or lands that would be conserved specifically for Crotch's bumble bee and then enhanced. One potential mitigation area being investigated is conserved land under Los Angeles World Airports (LAWA). Habitat enhancement would be implemented at a minimum 1:1 ratio.

Mitigation Measures for Impact BIO-1d (Burrowing Owl)

BIO-1d **Protection and Avoidance Surveys for Burrowing Owls.** Prior to construction, a qualified biologist will survey the Project site and a 500-foot buffer around the Project site for burrowing owls following methods included in the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). The first survey must be conducted between 14 and 30 days of starting initial grading or Project activities. The survey results must be submitted to the City of Torrance before any Project activities may proceed. If ground disturbance is delayed for more than 30 days, the area must be resurveyed including but not limited to a final survey conducted within 24 hours prior to ground disturbance. If burrowing owls are found, the City of Torrance must notify the California Department of Fish and Wildlife (CDFW) within three days. If “take” avoidance is determined to be infeasible, then the Applicant shall obtain an Incidental Take Permit (ITP) from CDFW. All conditions of the Incidental take Permit must be followed.

Mitigation Measures for Impact BIO-1g (California Legless Lizard)

BIO-1g **Mitigation for Legless Lizards.** The following measures shall be implemented:

- **Relocation of Legless Lizards.** Legless lizards that occupy the site will be captured and relocated to an approved site within Los Angeles County. The relocation will involve two phases. The first phase will include capture and relocation of legless lizards prior to ground disturbing activities, preferably during the winter period when soil moisture is close to the surface. The timing and duration of the initial relocation efforts will be determined by the biologist, but it is expected that relocation efforts will be staggered over a period of weeks or months prior to ground disturbing activities. The second phase will include capture and relocation of any remaining legless lizards during ground disturbing activities. The relocation site will consist of the Los Angeles World Airports (LAWA) Los Angeles/El Segundo Dunes in Los Angeles County or other potentially suitable location approved by CDFW and the City of Torrance.

The Project Biologist will prepare a Southern California legless lizard Relocation Plan which will address both relocation phases, to be approved by the City of Torrance and CDFW that will include the components listed above. Specifically, the plan will include the following:

- Description of the Relocation/Receptor site, which must be procured or permissions obtained prior to implementation of the capture and relocation program.
 - Description of relocation phases, including timing, methodology, duration, and responsibilities of the Project Biologist.
 - Description of the Receptor Site and release of the legless lizards during each of the phases described above.
- **Restoration of Coastal Dune Habitat.** Coastal dune habitat at a location approved by the City of Torrance and CDFW will be restored at a minimum 1:1 ratio over the 6.76 acres of occupied habitat identified at the Project site. As previously stated, the relocation site will consist of the LAWA Los Angeles/El Segundo Dunes or other potentially suitable location(s) approved by CDFW and the City of Torrance.

If the LAWA Los Angeles/El Segundo Dunes are selected as the relocation site, the proposed dune restoration will be implemented consistent with Appendix A-3c of the LAX Master Plan Final Environmental Impact Statement entitled “Los Angeles/El Segundo Dunes Habitat Restoration Plan” dated January 2005. Restoration would occur

within the approximately 307-acre Los Angeles/El Segundo Dunes which includes an approximately 203 acres reserved for the El Segundo blue butterfly and as such includes sufficient area for the restoration effort. The Los Angeles/El Segundo Dunes support an existing population of legless lizards and represents an ideal site for the proposed restoration. The Los Angeles/El Segundo Dunes Habitat Restoration Plan includes the following performance standards for dune restoration:

Performance criteria to be met include the attainment of 10-, 20, 30-, 40, and 45-percent cover of native species, including perennials and annuals typical of the habitat, over a five-year period, as determined by the point-intercept method, conducted during the spring, to facilitate the identification of annual species. Additional performance criteria to be met include the attainment of no more than 15-percent cover of non-native species and 0-percent cover of non-native invasive species as defined by the California Exotic Pest Plant Council [note: currently known as California Invasive Plant Council]. In addition, the following model, as prescribed in the Long-Term Management Plan, shall be adhered to with the final value, in conjunction with a 45-percent cover of native species, determining the final success criteria (Table 5.5.4-1, Southern Foredune Model: Subsite 23). If monitoring discerns any failure in performance goals, remedial plantings shall be undertaken. Habitat restoration shall be conducted by a qualified habitat restoration specialist.

The above-referenced performance standard may be modified in coordination with CDFW and LAWA to ensure optimal habitat conditions for the legless lizard.

4.2.4. Cumulative Impact Analysis

Geographic Extent/Context

The geographic scope of the cumulative impact analysis includes the Project site and nearby projects listed in the City of Torrance's Major Development List, which are within roughly five miles of the Project site. Refer to Table 3-1 for a list of nearby cumulative projects.

Cumulative Impact Analysis

In an ecological context, the habitats in the Project site differ significantly from those in the vicinity, with most projects in the City of Torrance being infill in nature. As most projects in the vicinity are redevelopment sites (most with less than significant or no significant impacts to biological resources pursuant to CEQA), the effects of this Project and other projects in the vicinity are not likely to become cumulatively considerable or more harmful when considered together rather than when considered separately. Reasonably foreseeable projects that include mitigation for biological resources are also not anticipated to cause additive or incremental mortality and habitat loss for special-status species or habitats beyond the threshold of significance, as none are expected to have similar impacts or are contiguous with the Project site. Cumulative impacts are anticipated to be less than significant, and no additional mitigation is required for cumulative impacts.

4.2.5. Summary of Significance Findings

Table 4.2-2 provides a summary of each identified biological resource impact and associated mitigation measures to reduce or avoid the impact (where warranted). Mitigation measures are required for each significant impact but are not required for impacts that are not significant.

Table 4.2-2. Summary of Biological Resources Impacts and Mitigation Measures

Impacts	Mitigation Measures
Impact Bio-1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	
Construction – Less Than Significant with Mitigation	MM-BIO-1a: Mitigation for Southern Tarplant MM-BIO-1b: Protection and Avoidance Surveys for Nesting Birds MM-BIO-1c: Protection and Avoidance Surveys for Crotch's Bumble Bees MM-BIO-1d: Protection and Avoidance Surveys for Burrowing Owls MM-BIO-1g: Mitigation for Legless Lizards
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact BIO-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact BIO-3: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	
Construction – Less Than Significant with Mitigation	MM-BIO-1b: Protection and Avoidance Surveys for Nesting Birds
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.

4.3. Cultural Resources

This section provides information on existing cultural resources in and surrounding the Project area. CEQA requires that the effects of discretionary projects on cultural resources be considered in the planning process. This section evaluates the Project's potential impacts to these resources. Tribal Cultural Resources are separately addressed in Section 4.9, *Tribal Cultural Resources* (TRCs). TRCs are a defined class of resources under state law, which include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Tribe.

Cultural resources can reflect the history, diversity, and culture of the region, as well as the people who created them. Cultural resources are unique in that they are often the only remaining evidence of human activity that occurred in the past. Cultural resources can be natural or built, purposeful or accidental, physical or intangible. They encompass archaeological, traditional, and built environment resources, including but not necessarily limited to buildings, structures, objects, districts, and sites. Cultural resources include locations where important events occurred, traditional cultural places, sacred sites, and places associated with important people.

The following discussion is based on the Cultural Resources Study prepared by Brian F. Smith and Associates (Garrison & Smith, 2021) for the Project and included in Appendix F, unless otherwise referenced. The proposed Project's potential effects on cultural resources were evaluated using the criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are discussed in more detail in Section 4.3.3.3, Environmental Impact Analysis. The analysis concludes that the proposed Project impacts associated with cultural resources would be less than significant with mitigation.

No scoping comments were received regarding cultural resources during the public scoping period for the proposed Project.

4.3.1. Environmental Setting

4.3.1.1. General Site Conditions

The Project site is situated on approximately 31.3 acres in the southwestern portion of Los Angeles County, within the jurisdiction of the City of Torrance. Topographically, the site exhibits gently rolling terrain in the western region and transitions to a relatively flat mesa in the eastern region, with ground surface elevations ranging from approximately 55 to 90 feet above mean sea level. The site is located within the Central Basin, a sub-basin of the larger Los Angeles Basin, a structural and sedimentary geologic feature influenced by numerous active fault systems in the metropolitan area.

The underlying geologic materials predominantly consist of Quaternary-aged (the last 2.6 million years to the present day) (late to middle Pleistocene or roughly 1.2 million years to 11,700 years ago) old eolian deposits,²⁰ with a minor extent of Quaternary (middle to late Pleistocene or roughly the last 300,000 to 11,700 years ago) old alluvium²¹ present in the northeastern portion of the site. Surface soils include Urban land-Marina complex with 0 to 5 percent slopes, and Urban land-Centinela-Typic Xerorthents, fine substratum complex with 0 to 2 percent slopes, consistent with disturbed or developed urban settings.

²⁰ Old eolian deposits are ancient accumulations of sediment (sand and silt) that were originally transported and deposited by wind, such as dunes. Over long periods, these deposits become cemented and lithified into sandstone and other sedimentary rock, and they can be found interbedded with non-eolian deposits in the geologic record.

²¹ Alluvium is the collective term for unconsolidated material—like clay, silt, sand, and gravel—transported and deposited by rivers and streams, resulting in alluvial deposits on floodplains, deltas, and stream beds.

Vegetative cover across the Project site is primarily composed of non-native herbaceous species, including ruderal grasses²² and invasive weed species.²³ Ice plant is prevalent along the site perimeter, while scattered ornamental tree species such as pepper, palm, and eucalyptus are distributed throughout the site. A dense aggregation of acacia shrubs is present in the northwestern quadrant of the property. Isolated patches of riparian and coastal sage scrub vegetation are present in the western portion, though these are limited in extent and fragmented.

The site would have supported a range of terrestrial resources utilized by Indigenous populations. Native fauna likely included small to medium-sized mammals (e.g., rabbits, squirrels, gophers, rodents, deer, coyotes), as well as various reptiles and amphibians. The local environment would have provided a diverse subsistence resource base, with freshwater likely accessible via ephemeral drainages and the San Gabriel River to the east. The nearby Pacific coastline, located west of the site, would have served as a supplementary source of marine-based resources.

4.3.1.2. Regional Archaeological Context

Precontact Context

Early Holocene (8,000 Years before Present [YBP])

The earliest known human remains from coastal southern California are attributed to the individual referred to as "Los Angeles Man." Initially dated to approximately 26,000 YBP using amino acid racemization and conventional radiocarbon methods, subsequent analysis using accelerator mass spectrometry yielded later and more reliable dates, indicating the initial estimate was likely overstated.²⁴

Evidence of early human occupation during the early Holocene (approximately 11,700 to 8,000 YBP) has been increasingly identified along the southern California coast and offshore islands. Notable early Holocene archaeological sites include Arlington Springs on Santa Rosa Island, Daisy Cave and Arlington Springs on San Miguel Island, and Eel Point on San Clemente Island. These coastal and insular sites suggest a pattern of southward migration and coastal adaptation by early populations. The absence of comparable early Holocene sites on the mainland may be attributable to sea level rise, which likely submerged or eroded coastal archaeological deposits from this period.

This era aligns with Wallace's Period I (Early Man Horizon), characterized by the presence of mobile foraging populations. A significant and prolonged sea-level rise between approximately 10,000 and 6,000 YBP is believed to have obscured or destroyed many early coastal archaeological sites. Environmental changes during this time may have prompted a transition from exploitation of rocky intertidal zones to estuarine and lagoon resources, reflecting an increasingly diversified subsistence strategy.

Middle Holocene (8,000 to 3,000 YBP)

By the middle Holocene, sea levels began to stabilize, and temperatures reached a climatic optimum around 6,800 YBP. Archaeological evidence from this period is marked by an increased presence of grinding tools such as manos and metates, suggesting a subsistence focus on plant processing. Habitation sites from this time are generally situated on elevated landforms within grassland and sagebrush ecological communities, located some distance from the shoreline.

Material culture from this period includes large projectile points, charm stones, and stone ornaments. In contrast, bone and shell tools, as well as trade items, are relatively uncommon. Settlements are typically

²² Ruderal grasses are pioneer plants that colonize disturbed areas with poor or compacted soils, such as abandoned lots, along sidewalks, or after natural disasters like fires and floods.

²³ An invasive weed is a non-native plant species (plants that do not naturally occur in a specific ecosystem and are introduced by human activity) that spreads aggressively.

²⁴ Amino acid racemization, conventional radiocarbon methods, and accelerator mass spectrometry are all methods for determining the age of organic materials.

characterized as semi-sedentary, supporting populations ranging from approximately 15 to 100 individuals. These were primarily located within coastal and riparian environments. This phase corresponds to Warren's Encinitas Tradition and Wallace's Period II (Milling Stone Horizon), with dates extending to approximately 3,000 YBP.

Between approximately 5,000 and 3,350 YBP, there was a marked increase in the use of mortars and pestles, suggesting a dietary shift toward acorn processing. Other artifacts from this period include side-notched and leaf-shaped projectile points, basket-hopper mortars, varied stone tools, bone implements, and shell ornamentation. This interval is associated with Warren's Campbell Tradition and Wallace's Period III (Intermediate Horizon), continuing until approximately 1,000 YBP.

This phase also reflects a broader economic adaptation involving hunting, fishing, and gathering across diverse environments. Coastal populations emphasized marine resources, while inland groups focused on terrestrial game. Increasing evidence of trade goods from this time indicates the development of more extensive regional exchange networks. Settlements became more permanent and began to resemble the village-based pattern that persisted into the Late Precontact Period (the final stage of Native American history before significant European contact). By 3,000 YBP, the Ballona region, located north of the current Project area, was subject to intensive and continuous occupation. Some researchers propose that increased population densities during this period were at least partly driven by migration from desert regions.

Late Holocene (3,000 YBP to Contact)

During the Late Holocene, population density across the Los Angeles Basin increased substantially, necessitating further economic diversification. This period corresponds to Wallace's Period IV (Late Horizon). Ethnographic records, particularly those collected by Spanish missionaries and explorers, identify the Gabrielino (or Tongva) as the primary Indigenous group occupying the Project vicinity during this time.

The Gabrielino's traditional territory encompassed the watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers, along with adjacent mountain ranges, much of the Los Angeles Basin, the coastline between Aliso Creek and Topanga Creek, and several southern Channel Islands, including San Clemente, San Nicolas, and Santa Catalina. Linguistically, the Gabrielino spoke a Cupan language belonging to the Takic branch of the Uto-Aztecan language family. This distinguished them from other regional groups, such as the Chumash to the north and the Kumeyaay to the south, who spoke languages of the Hokan stock.

The Gabrielino practiced a hunting and gathering economy that included the use of acorns, seeds, shellfish, fish, and terrestrial mammals. Archaeological evidence supports this subsistence strategy and includes the presence of arrow points, fishhooks, scrapers, grinding stones, and basketry tools. Santa Catalina Island served as a significant source of steatite,²⁵ which the Gabrielino quarried and traded with neighboring groups.

At the time of European contact, the Gabrielino are estimated to have occupied between 50 to 100 permanent villages, primarily situated along rivers, streams, and coastal environments. These villages were supported by a network of smaller seasonal camps and resource extraction sites. Typical village structures included residential houses, sweathouses,²⁶ and ceremonial buildings. Artifacts from this period reflect a rich material culture, with items made from shell, asphaltum,²⁷ steatite, and intricately crafted baskets.

²⁵ Steatite is a soft, naturally occurring metamorphic rock composed primarily of talc and other minerals like magnesite, which gives it a characteristic "soapy" or greasy feel. It is known for its ability to be easily carved and shaped, even with simple tools.

²⁶ Native American sweathouses, or sweat lodges, are dome-shaped structures built from saplings and covered with blankets or skins to create an enclosed space for a spiritual ceremony of sweating, praying, and healing.

²⁷ Asphaltum is a naturally occurring form of petroleum, also known as bitumen, which seeps to the Earth's surface, leaving behind a thick, sticky residue after lighter substances evaporate.

Villages were strategically located at the interface of multiple ecological zones, maximizing access to diverse resources. Offshore fishing and hunting were facilitated through the use of plank canoes, while shoreline gathering of shellfish and waterfowl was common. At contact, the Gabrielino were considered one of the most populous, affluent, and politically influential Native groups in southern California, second only to the Chumash.

Ethnographic Context

The Project area lies within the traditional territory historically occupied by the Tongva people. The Tongva are part of the broader Uto-Aztecan language family,²⁸ specifically the Takic (Shoshonean) branch. Linguistic and archaeological evidence indicates that the Tongva, speaking the Cupeño language, arrived in Southern California around 500 Before Common Era (BCE),²⁹ as part of the larger Shoshonean migration into the region (Smith & DeOliveira, 2023).

At the time of European contact in the late 18th century, the Tongva occupied an expansive and ecologically diverse territory encompassing approximately 1,500 square miles, including both coastal and inland regions of what are now Los Angeles and Orange counties. Their territory extended offshore to include the Channel Islands of San Nicolas, San Clemente, and Santa Catalina (Smith & DeOliveira, 2023). Among Southern California Indigenous groups, the Tongva were second only to the Chumash in terms of population, economic complexity, and political influence (Smith & DeOliveira, 2023).

Settlement studies indicate that Tongva habitation patterns included both permanent villages and seasonal camps, often located near reliable water sources (Smith & DeOliveira, 2023). Primary villages were typically occupied year-round, while smaller, temporary camps were used for seasonal resource gathering.

The Tongva culture shared many traits with that of the Chumash, particularly in subsistence strategies and social organization, although differences were evident in their language, mortuary practices (particularly cremation), and their use of ceramic technology. The Tongva's cultural influence extended beyond their immediate territory, with evidence of interaction and exchange with groups as far north as the Yokuts of the San Joaquin Valley, east to the Colorado River tribes, and south into Baja California.

Material culture associated with the Tongva reflects a high level of craftsmanship. Everyday tools and ceremonial objects were often adorned with asphaltum, shell inlays, mineral pigments, and other decorative elements. The Tongva maintained a robust trade economy, exchanging food, crafted goods, and raw materials with neighboring groups. One of their most valued trade items was steatite, which they quarried from Santa Catalina Island. This soft stone was fashioned into a range of utilitarian and ceremonial objects, including cooking vessels, effigies, pipes, and ornaments.

Other commonly recovered Tongva artifacts include shell beads, finely woven baskets, bone tools, wooden implements such as paddles and drills, flint projectile points, fishhooks, and stone mortars and pestles (Smith & DeOliveira, 2023).

Tongva villages were architecturally complex, typically centered around ceremonial and communal structures. Dwellings were round, domed structures made of tule, fern, or carrizo, with some measuring up to 60 feet in diameter. Villages also included sweathouses, menstrual huts, dance grounds, and sacred enclosures. In larger settlements, elite residences often encircled ceremonial precincts, while commoners lived in smaller dwellings situated on the village periphery (Smith & DeOliveira, 2023).

²⁸ The Uto-Aztecan languages form a large and widespread family of over 30 indigenous languages, spoken across the Western United States and Mexico, with the name deriving from the Ute language of Utah and the Nahuatl (Aztec) languages of Mexico.

²⁹ Before Common Era (BCE) and Common Era (CE) are used to denote years on the Gregorian calendar, the most widely used calendar in the world today instituted by Pope Gregory XIII in 1582. The BCE/CE system provides a non-religious alternative to the Before Christ (BC)/Anno Domini (AD, Latin for "in the year of our Lord") system.

Historic Context

Spanish Period (1542 to 1821)

Spanish exploration of California began in 1542 with the maritime expedition led by Juan Rodríguez Cabrillo, whose crew landed at what is now San Diego Bay before continuing northward along the coast, including a passage by San Pedro Bay (Smith & DeOliveira, 2023). During this expedition, Cabrillo made peaceful contact with Indigenous peoples, including those on Santa Catalina Island. In 1602, a second expedition, under Sebastián Vizcaíno, also reported amicable interactions with the Tongva people on the island (Smith & DeOliveira, 2023).

Despite these early encounters, sustained Spanish colonization did not begin until 1769, when Franciscan missionary Junípero Serra and Spanish military leader Gaspar de Portolá arrived in San Diego, initiating the mission and presidio system in Alta California (Smith & DeOliveira, 2023). In 1772, Pedro Fages led the first recorded European incursion into the Antelope Valley.

The Spanish established 21 missions throughout California, with the objective of converting Indigenous populations to Catholicism and assimilating them into the colonial economy. The first mission within Tongva territory was Mission San Gabriel, founded in 1771. The Tongva were rapidly incorporated into the mission system, either through recruitment or displacement, and by the early 1800s most Tongva individuals had entered the mission labor force or fled to remote regions such as the Central Valley or nearby mountains.

During this period, Spanish military and civilian settlements began to develop around the missions, and retired soldiers from the Portolá expedition were granted land, which later became major ranchos, including Rancho San Pedro, Rancho Los Cerritos, and Rancho Palos Verdes. These land grants encompassed much of present-day Long Beach and the surrounding region (Smith & DeOliveira, 2023).

Mexican Period (1821 to 1848)

The Mexican Period began in 1821 following Mexico's independence from Spain. While California remained largely unchanged initially, the secularization of the missions in the 1830s shifted control of lands and labor. Despite the Mexican Constitution of 1824 granting Indigenous peoples citizenship, Native Californians continued to be subjected to unpaid labor under the mission system, causing tension with the newly empowered landholding class (Smith & DeOliveira, 2023).

The Mexican government began issuing extensive land grants, especially in inland areas, to encourage settlement and economic development. Ranching, particularly cattle grazing, became the dominant economic activity. Hides from cattle were exported as a primary commodity, forming the backbone of Southern California's trade economy. Concurrently, the region saw an increase in non-Native populations due to the arrival of trappers, traders, and settlers (Smith & DeOliveira, 2023).

In 1822, trade restrictions were lifted, opening California to foreign merchants and industries such as whaling. The San Pedro area developed as a commercial hub during this time. In 1834, a portion of Rancho San Pedro was granted to the Sepúlveda family, who developed harbor infrastructure that supported growing maritime trade. By the 1840s, Los Angeles had become the largest population center in Southern California.

During the Mexican-American War (1846 to 1848), Southern California was the site of several battles, including the Battle of the Old Woman's Gun in Dominguez Hills, the Battle of Chino, and the Siege of Los Angeles. Although Mexican forces initially repelled American troops, resistance ended with the signing of the Treaty of Cahuenga in January 1847, marking the beginning of United States (U.S.) control over California.

American Period (1847 to Present)

The American Period began officially in 1848 with the Treaty of Guadalupe Hidalgo, which ended the Mexican-American War and ceded California, along with other territories, to the U.S. California achieved statehood in 1850, and Los Angeles County was established, encompassing areas that now include Kern, San Bernardino, Orange, and Riverside counties.

City of Torrance

The subject property lies within the historic boundaries of Rancho San Pedro, originally granted in 1784 by the Spanish crown to soldier Juan José Domínguez. At approximately 75,000 acres, it was the first Spanish land grant in California (Dominguez Rancho Adobe Museum, n.d.; Los Angeles County Library, n.d.). Following Domínguez's death, ownership transferred to his nephew Cristóbal Domínguez, and later to Manuel Domínguez, who was granted U.S. patent title to 25,000 acres of the rancho in 1858 (Dominguez Rancho Adobe Museum, n.d.).

In 1911, significant portions of the Domínguez family land were sold to industrial developer Jared Sidney Torrance, who acquired approximately 3,500 acres—2,791 acres from the Domínguez Estate and 730 acres from Susana Domínguez Del Amo—to establish a new industrial-residential town (Our Old Town Torrance, n.d.). Torrance and his investors formed the Dominguez Land Company and officially founded the town of Torrance in 1912, despite early objections to the name.

Landscape architect Frederick Law Olmsted Jr. was commissioned to design a city layout that strategically separated industrial areas from residential neighborhoods to mitigate pollution and promote livability (Our Old Town Torrance, n.d.). Torrance was formally incorporated as a city in May 1921.

Though initial growth was slowed by the post-World War I economic downturn, the discovery of oil in 1921 in southern and central Torrance led to rapid development. Oil extraction soon dominated the local economy and altered the physical landscape (Dominguez Rancho Adobe Museum, n.d.).

4.3.1.3. Cultural Resources Data Collection

Record Search and Background Research

The Applicant's consultant (Garrison & Smith, 2021; Appendix F) conducted a record search and background research that included a review of information concerning previously conducted cultural resource surveys and previously recorded sites in the Project area plus a 1-mile record search buffer, as well as a review of additional historic documents.

Garrison & Smith (2021) submitted a request to the South Central Coastal Information Center (SCCIC), located at California State University, Fullerton, to conduct a literature and records search of the Project area and surrounding buffer. Additionally, the following resources were reviewed for built environment resources:

- National Register of Historic Places Index
- Office of Historic Preservation, Archaeological Determinations of Eligibility
- Office of Historic Preservation Built Environment Resources Directory
- Historic maps, including the 1896 and 1944 15-minute Redondo and 1924, 1934, 1951, and 1964 7.5-minute Torrance quadrangle maps³⁰
- Aerial photographs dated between 1928 and 2020
- Los Angeles Historic Cultural Monuments Database

³⁰ A 15-minute quadrangle is an older, larger topographic map published by the U.S. Geological Survey that covers an area defined by 15 minutes of latitude and 15 minutes of longitude, resulting in less detail and a smaller scale (1:62,500) compared to the newer, more detailed 7.5-minute quadrangle. The 7.5-minute quadrangle, the current standard for the contiguous U.S. and Hawaii, covers an area of 7.5 minutes of latitude by 7.5 minutes of longitude at a larger scale (1:24,000), providing greater detail and making it the official replacement for the 15-minute series.

The records search revealed that 20 cultural resource investigations have been conducted within a 1-mile radius of the Project area, with three (3) of these studies overlapping the Project. These prior investigations included a literature review, a historic property survey, and an updated historic context statement. However, none of these efforts involved a formal, systematic archaeological survey of the Project area. Despite this, previous research indicates a high density of cultural resources in the surrounding area. By 2009, at least 141 historic age structures and 12 precontact sites had been documented within or adjacent to the City of Torrance. Notably, this includes the Malaga Cove site, a significant precontact habitation area featuring a dense midden deposit³¹ overlooking the Pacific Ocean, which can be found approximately 6 miles to the southwest.

Review of the above databases showed no registered historic or cultural landmarks within or adjacent to the Project area.³²

Historic Aerial Photograph Review

Based on the review of maps and aerial photographs, the property was historically used for agriculture, as seen in the 1928 and 1941 aerial images. By the 1952, 1963, and 1972 aerial photographs, the western portion of the site appears to have been partially graded, cut into, and otherwise disturbed, while the eastern portion continued to be used for agricultural purposes. These disturbances on the western side are likely related to oil exploration or other activities connected to the nearby oil refineries, although the exact cause of these disturbances cannot be clearly determined from the photographs.

A structure is visible in the eastern agricultural area in the 1963 and 1972 photographs but appears to have been removed by 1980. Between 1972 and 1980, the extension of Madrona Avenue and Del Amo Boulevard is also evident along the western and southern edges of the property, respectively.

The buildings and equipment associated with the current equestrian operation do not appear in aerial photographs until 1994. Recently the structures associated with equestrian operation were relocated outside of the Project area.

Pedestrian Survey

On January 6, 2021, Project Archaeologist Andrew Garrison and Field Archaeologist Allison Reynolds of Brian F. Smith and Associates conducted an intensive pedestrian survey of the Project area. The survey methodology involved systematically walking transects spaced approximately 10 meters apart, where feasible, while closely inspecting the ground surface for cultural materials. All areas with potential for cultural resource sensitivity were carefully examined. Photographic documentation of the survey conditions and specific areas assessed was conducted regularly throughout the investigation.

The intensive pedestrian survey yielded negative results, with no cultural resources identified during the investigation. Due to the extent of surface-level disturbances, the current condition of the property was not conducive to identifying surface-level artifact scatters.

The Project site was primarily characterized by non-native vegetation, consisting of various grasses and weeds. Additional vegetation observed included ice plant along the perimeter, pepper, palm, and eucalyptus trees throughout the property, and a dense concentration of acacia bushes located in the northwest corner. The western two-thirds of the site exhibited significant evidence of prior disturbance. This included a network of dirt and gravel access roads, the presence of equipment and an above-ground pipeline linked

³¹ A midden deposit, or archaeological midden, is a historical accumulation of human-discarded waste materials such as shells, bones, pottery shards, and tools, which offers archaeologists invaluable insights into the daily lives, diet, and activities of past communities.

³² A historical and cultural landmark is a physical place, such as a building, site, or object, that holds significant historical, cultural, or architectural value and is recognized for its importance to a community, region, or nation.

to the adjacent oil refinery, and scattered piles of displaced soil, gravel, modern refuse, and construction debris, primarily composed of concrete and asphalt.

Surface visibility was reduced due to these disturbances and areas of dense vegetation. Although the eastern third of the site appeared less impacted, visibility was still hindered by modern prefabricated sheds, animal corrals, and trailers. Fields in the northeastern section were actively being used for the disposal of horse manure.

Ground-disturbing activities such as clearing, disking, and dumping have likely obscured or removed any surface evidence of cultural materials. As a result, it is unclear whether cultural resources were ever present on the property, and the potential for their detection during surface surveys has been significantly diminished.

Native American Heritage Commission Sacred Lands File (SLF) Search

On December 18, 2020, Brian F. Smith and Associates requested a SLF search for the Project area from the Native American Heritage Commission (NAHC). On January 8, 2021, the NAHC responded that no sensitive or sacred Native American sites were identified in the Project area based on the SLF search results. The NAHC also provided a list of traditionally and culturally affiliated California Native American Tribes that must be consulted regarding any potential Native American cultural resources in the Project area.

On November 30, 2022, the City of Torrance sent formal Assembly Bill 52 (AB 52) notification to the tribes identified in the SLF search results (see Section 4.9, Tribal Consultation, for more information about AB 52 and tribal consultation conducted for the proposed Project).

4.3.1.4. Buried Sensitivity Analysis

Although the intensive pedestrian survey did not identify any surface cultural resources within the Project area, the potential for buried archaeological materials remains due to the regional geologic and cultural context. The Project area is underlain by late Pleistocene to Holocene alluvial deposits, which are known to have moderate to high sensitivity for buried cultural deposits (California Geological Survey, 2010). These unconsolidated to moderately indurated sediments,³³ composed of clay, silt, sand, and gravel, are characteristic of alluvial fan and floodplain environments that were conducive to precontact human occupation and activity due to their high resource availability, fertile soils, and reliable access to water. Given the broader region's history of human occupation and the presence of significant precontact sites nearby, it is possible that intact cultural materials exist below the current ground surface, especially in areas that have not been heavily graded or developed. Past archaeological investigations in the vicinity have documented both precontact and historic sites, suggesting long-term use of the area by Indigenous populations and later Euro-American settlers.

In summary, while the ground surface of the Project area shows evidence of modern disturbances such as grading, construction debris, and vegetation overgrowth, these activities may have obscured or buried cultural resources rather than eliminated them. As such, the site retains a moderate sensitivity for buried archaeological resources.

4.3.2. Applicable Regulations, Policies, and Standards

4.3.2.1. State

The National Register of Historic Places (NRHP) is the official list of historic places in the U.S. worthy of preservation and is maintained by the National Park Service. The California Register of Historical

³³ Indurated sediments are sediments that have hardened, typically by becoming cemented together by minerals precipitating in the pore spaces, or by being compacted by heat and pressure, transforming them into sedimentary rock.

Resources (CRHR) is the state-level version of the NRHP and serves as an authoritative guide for identifying California's significant historical and archaeological resources by providing criteria to determine if resources are eligible for protection.

CEQA (1970) (Public Resources Code [PRC] Sections 21000 et seq., Section 21083.2, Section 5024, Section 5024.5; California Code of Regulations [CCR] Title 14, Chapter 3, Sections 15000 et seq.) established that historical and archaeological resources are afforded consideration and protection under its provisions. The CEQA Guidelines define significant cultural resources under three regulatory designations: historical resources, unique archaeological resources, and tribal cultural resources. The latter is discussed separately in Section 4.9, Tribal Cultural Resources (see “AB 52 – Tribal Cultural Resources” in Section 4.9.2.1).

A historical resource is a “resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR”; or “a resource listed in a local register of historical resources or identified as significant in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code”; or “any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the agency’s determination is supported by substantial evidence in light of the whole record” (14 CCR Section 15064.5[a][3]).

Historical resources automatically listed in the CRHR include California cultural resources listed in or formally determined eligible for the NRHP and California Historical Landmarks list from No. 770 onward (PRC 5024.1[d]). Locally listed resources are entitled to a presumption of significance unless a preponderance of evidence in the record indicates otherwise.

Under CEQA, a resource is generally considered historically significant if it meets the criteria for listing in the CRHR. A resource must meet at least one of the following criteria (PRC 5024.1; 14 CCR Section 15064.5[a][3]):

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage. Title 14, CCR Section 4852(b)(1) adds, “is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.”
2. Is associated with the lives of persons important in our past. Title 14, CCR Section 4852(b)(2) adds, “is associated with the lives of persons important to local, California, or national history.”
3. Embodies the distinctive characteristics of a type, period, region, or method of construction; or represents the work of an important creative individual; or possesses high artistic values. Title 14, CCR 4852(b)(3) allows a resource to be CRHR eligible if it represents the work of a master.
4. Has yielded, or may be likely to yield, information important in prehistory or history. Title 14, CCR 4852(b)(4) specifies that importance in prehistory or history can be defined at the scale of “the local area, California, or the nation.

Historical resources must also possess integrity of location, design, setting, materials, workmanship, feeling, and association (14 CCR 4852[c]).

An archaeological artifact, object, or site can meet CEQA’s definition of a unique archaeological resource even if it does not qualify as a historical resource (PRC 21083.2[g]; 14 CCR 15064.5[c][3]). An archaeological artifact, object, or site is considered a unique archaeological resource if “it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria (PRC 21083.2[g]):

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.

- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important precontact or historic event or person.

4.3.2.2. Local

City of Torrance Historic Preservation Ordinance

The City of Torrance has adopted regulations to identify, protect, and manage cultural and historic resources within its jurisdiction. These regulations are codified in the Torrance Historic Preservation Ordinance (Ordinance No. 3822), which establishes the framework for designating historic landmarks and districts, as well as criteria for evaluating the significance of potential historic resources (City of Torrance, 1989). The ordinance created the Torrance Register of Historic Resources and outlines procedures for nomination, review, and preservation of designated properties.

To qualify for designation as a historic resource under the ordinance, a property must meet at least one of the following criteria:

- Be listed or determined eligible for listing in the CRHR or NRHP, provided the property retains integrity;
- Be identified as eligible through a historic resource survey adopted by the Torrance City Council; or
- Be determined by a qualified historic preservation professional to meet the criteria in Torrance Municipal Code (TMC) Sections 91.50.050 or 91.50.060, which assess significance based on association with significant historical events or persons, architectural or aesthetic merit, or the potential to yield important historical or precontact information.

Torrance Municipal Code (TMC)

The Historic Preservation Commission, established by TMC Chapter 13.21, oversees the identification and evaluation of cultural and historic resources in the City (City of Torrance, 2023). Chapter 92 – Zoning Code requires that projects be consistent with the Torrance General Plan, including goals related to cultural conservation (City of Torrance, 2023).

Historic Preservation Commission

The City has established a Historic Preservation Commission, authorized under TMC Division 1, Chapter 3, Article 21 (Sections 13.21.1 to 13.21.9). This commission advises on matters related to cultural and historical resources, including the review of applications for historic designation and proposed modifications to designated properties. The commission plays a key role in implementing preservation policy at the local level and ensuring that historic character is maintained in accordance with City regulations.

City of Torrance General Plan – Community Resources Element

The Community Resources Element of the Torrance General Plan provides additional policy direction for the preservation of cultural and historic resources (City of Torrance, 2010). It establishes goals and policies aimed at identifying and evaluating structures and sites of historical or architectural interest, supporting the maintenance and preservation of such resources, and integrating preservation goals with broader community development objectives.

These local regulations ensure that the City of Torrance maintains a proactive role in the protection and management of cultural resources and that potential impacts to such resources are considered during project planning and environmental review pursuant to CEQA.

4.3.3. Environmental Impacts Analysis and Mitigation

4.3.3.1. Impact Analysis Approach

Impacts to cultural resources can be measured as direct and/or indirect and must be significant enough to cause a substantial adverse change in the significance of a historical resource, unique archaeological resource, or human remains. The direct impacts of construction to cultural resources can include immediate physical alterations, damage, or destruction of all or a part of a resource; or demolition or material alteration in an adverse manner of those physical characteristics of a resource that convey the its significance. In contrast, indirect impacts are effects that are often caused by visual, noise, vibration, or setting changes that would cause a substantial adverse change in the significance of a cultural resource. Information from record searches and the pedestrian survey were compared to significance criteria in Section 4.3.3.2 below to assess whether proposed Project construction and operational activities would adversely impact any known significant cultural resources.

4.3.3.2. Significance Criteria

Project impacts related to cultural resources were evaluated against the CEQA significance criteria and are discussed in the following sections. The impact analysis evaluates potential proposed Project impacts during the construction phase and the operation and maintenance phase. Under CEQA, the proposed Project would have a significant impact if it caused a substantial adverse change in the significance of a historical resource, a unique archeological resource, or human remains as defined under CCR, Title 14, Chapter 3, Section 15064.5. The significance criteria listed below are based on Appendix G of the CEQA Guidelines.

Would the proposed Project:

- Physically alter, damage, or cause destruction of all or a part of a historical or archaeological resource?
- Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources, inclusion in a local register of historical resources, or its determination to be a historical resource by a CEQA lead agency?
- Demolish or materially alter in an adverse manner those physical characteristics of an archaeological artifact, site, or object that enable it to meet the definition of a unique archaeological resource under CEQA?
- Disturb any human remains, including those interred outside of formal cemeteries?

4.3.3.3. Environmental Impact Analysis

As described in Section 2, Project Description, the proposed Project would include developing a Class A industrial warehouse building, including 15,000 square feet of office space on 31.3 acres of currently vacant land. The proposed Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. The proposed Project also includes future road improvements (including installation of a sewer line) along Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court, totaling an additional 7.79 acres.

Impact CR-1: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5

Construction

LESS THAN SIGNIFICANT WITH MITIGATION. Based on the background research, pedestrian survey, and assessment of resources discussed in detail above, no cultural resources meeting the definition of a historical

resource have been identified within the Project area. Therefore, the Project would not impact known historical resources.

As with any project involving ground disturbing activity, there is the potential to encounter unknown buried resources. Mitigation Measure (MM) CR-1 outlines the procedures to follow in the event of an unanticipated discovery, including a 50-foot stop work buffer, retention of a qualified archaeologist to evaluate any finds, and recommended treatment, as needed. With implementation of MM CR-1, impacts to unknown buried resources would be less than significant.

Operations and Maintenance

NO IMPACT. No ground disturbance is proposed as part of general operations and maintenance. Therefore, Project operations would not cause a substantial adverse change to a historical resource.

Impact CR-2: Cause a substantial adverse change in the significance of unique archaeological resources or archaeological resources as defined in State CEQA Guidelines Section 15064.5.

Construction

LESS THAN SIGNIFICANT WITH MITIGATION. Based on the background research, pedestrian survey, and assessment of resources discussed in detail above, no cultural resources meeting the definition of a unique archaeological resource have been identified within the Project area. Therefore, the Project would not impact known unique archaeological resources.

As with any project involving ground disturbing activity, there is the potential to encounter unknown buried resources. MM CR-1 outlines the procedures to follow in the event of an unanticipated discovery, including a 50-foot stop work buffer, retention of a qualified archaeologist to evaluate any finds, and recommended treatment, as needed. With implementation of MM CR-1, impacts to unknown buried resources would be less than significant.

Operations and Maintenance

NO IMPACT. No ground disturbance is proposed as part of general operations and maintenance. Therefore, Project operations would not cause a substantial adverse change to a unique archaeological resource.

Impact CR-3: Disturb human remains, including those interred outside of formal cemeteries.

Construction

LESS THAN SIGNIFICANT WITH MITIGATION. As discussed previously, no human remains, including those interred outside of formal cemeteries, were identified during the background research or pedestrian survey. Therefore, the Project would not impact known human remains.

As with all projects that involve ground disturbing activities, there is a chance to encounter unknown buried resources that could include human remains. MM CR-3 states that if human remains are encountered (or suspected) during onsite construction activities, Section 7050.5 of the California Health and Safety Code must be followed and outlines communication procedures consistent with the California Health and Safety Code. Therefore, with implementation of MM CR-3, impacts to unknown buried resources, including human remains, would be less than significant.

Operations and Maintenance

NO IMPACT. No ground disturbance is proposed as part of general operations and maintenance. Therefore, Project operations would not cause a substantial adverse change to human remains.

4.3.3.4. Mitigation Measures

CR-1 Inadvertent Discovery of Cultural Resources. During construction, if cultural resources are encountered during ground disturbing activity, all activity within a 50-foot radius of the find shall be stopped, the City of Torrance shall be notified, and a qualified archaeologist shall be retained to evaluate the discovery will also be notified.

The qualified archaeologist shall determine if the discovery meets the definition of a historical or unique archaeological resource, and make appropriate recommendations regarding the significance and treatment of such find(s) prior to the continuation of any construction work within the above-referenced 50-foot radius. If the find(s) do(es) not meet the definition of a historical or unique archaeological resource, no further study or protection is necessary prior to reinitiating construction. If the find meets the definition of a historical or unique archaeological resource, then it shall be avoided by Project activities. If avoidance is not feasible, adverse effects to such resources will be mitigated in accordance with the recommendations of the archaeologist. Recommendations may include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery shall be submitted to the City of Torrance and the South Central Coastal Information Center.

CR-3 Inadvertent Discovery of Human Remains. During construction, if human remains are discovered during excavation or grading, all activity within a 50-foot radius of the find shall be stopped. The Los Angeles County Coroner shall be notified immediately to make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of the identification. Once the NAHC identifies the most likely descendant(s) (MLD), the descendant(s) will make recommendations regarding proper burial (including the treatment of grave goods), which will be implemented in accordance with Section 15064.5(e) of the California Code of Regulations, Title 14. The archaeologist shall recover scientifically valuable information, as appropriate and in accordance with the recommendations of the MLD. A report of findings documenting any data recovery shall be submitted to the City of Torrance and the South Central Coastal Information Center.

4.3.4. Cumulative Impact Analysis

Geographic Extent/Context

The geographic extent of this analysis is approximately 5 miles from the Project site. This geographic scope is appropriate because the cultural resources within this area are expected to be similar to those that occur on the Project site. Their proximity and similarity in environments would result in similar land-use, and thus, site types. Cumulative impacts could occur if other projects, in conjunction with the proposed Project, would have impacts on cultural resources that, when considered together, would be significant.

Cumulative Impact Analysis

As identified in Section 3, Table 3.1, cumulative projects that are within the geographic extent for cultural resources include cumulative projects ID 1, 3, 4, 5, 7, 8, 9, 10, 11, 12, and 13. These projects all likely involve ground disturbing activity to some degree that have the potential to impact buried cultural resources, and it is assumed that each project would implement similar inadvertent discovery mitigation measures to reduce impacts to buried unknown resources. The Project would require implementation of MM CR-1 and MM CR-3 which would lessen the overall impact to unknown buried cultural resources and

human remains. Therefore, the Project would not result in a cumulatively considerable contribution to impacts on historical resources, unique archaeological resources, or human remains.

4.3.5. Summary of Significance Findings

Table 4.3-1 provides a summary of each identified cultural resource impact and associated mitigation measures to reduce or avoid the impact (where warranted). Mitigation measures are required for each significant impact but are not required for impacts that are not significant.

Table 4.3-1. Summary of Cultural Resources Impacts and Mitigation Measures

Impacts	Mitigation Measures
Impact CR-1: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5	
Construction – Less Than Significant with Mitigation	CR-1: Inadvertent Discovery of Cultural Resources
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact CR-2: Cause a substantial adverse change in the significance of unique archaeological resources or archaeological resources as defined in State CEQA Guidelines Section 15064.5.	
Construction – Less Than Significant with Mitigation	CR-1: Inadvertent Discovery of Cultural Resources
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact CR-3: Disturb human remains, including those interred outside of formal cemeteries.	
Construction – Less Than Significant with Mitigation	CR-3: Inadvertent Discovery of Human Remains
Operations & Maintenance – No Impact	No mitigation measures are required.

4.4. Greenhouse Gas Emissions

This section discusses greenhouse gas (GHG) emissions associated with proposed Project construction, operation, and maintenance. GHG emissions were calculated and reported in carbon dioxide equivalents (CO₂e) for carbon dioxide (CO₂), nitrous oxide (N₂O), and methane (CH₄) emissions from on-road vehicles, off-road equipment, and refrigerants.

The following discussion is based on the Air Quality Impact Analysis and Greenhouse Gas Analysis prepared by Urban Crossroads, Inc. (2024a and 2024b) for the Project and included in Appendix D and Appendix G, unless otherwise referenced. The proposed Project's potential effects on GHG emissions were evaluated using the criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are discussed in more detail in Section 4.4.3.3, Environmental Impact Analysis. The analysis concludes that the proposed Project impacts associated with GHG emissions would be less than significant with mitigation.

No scoping comments were received regarding GHG emissions during the public scoping period for the proposed Project.

4.4.1. Environmental Setting

GHGs are inherently a global concern, in contrast with criteria air pollutants or toxic air contaminants, which are of regional and local concern. Scientific research indicates that observed climate change is most likely a result of increased GHG emissions associated with human activity (IPCC, 2023). Global climate change describes a collection of phenomena, such as increasing temperatures and rising sea levels, occurring across the globe. GHGs contribute to climate change by allowing ultraviolet radiation to enter the atmosphere and warm the Earth's surface but preventing some infrared radiation from the Earth from escaping back into space. Anthropogenic GHG emissions (resulting from human activities) are largely caused by the combustion of fossil fuels, which results in CO₂ emissions. Examples of natural sources of GHG emissions include the decomposition of organic matter in naturally occurring wetlands, releasing CO₂ and CH₄, as well as volcanic eruptions that release CO₂ and other gases.

GHGs are defined as any gas that absorbs infrared radiation in the atmosphere. GHGs include, but are not limited to, CO₂, CH₄, nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃). These GHGs lead to the trapping and buildup of heat in the atmosphere near the Earth's surface, commonly known as the greenhouse effect. There is overwhelming scientific consensus that human-related emissions of GHGs above natural levels have contributed significantly to global climate change by increasing the concentrations of the gases responsible for the greenhouse effect, which causes atmospheric warming above natural conditions.

Because GHG emissions are known to increase atmospheric concentrations of GHGs, and increased GHG concentrations in the atmosphere exacerbate global warming, a project that adds to the atmospheric load of GHGs adds to the problem. To avoid disruptive and potentially catastrophic climate change, annual GHG emissions must be substantially reduced. The impact to climate change due to the increase in ambient concentrations of GHGs differs from criteria pollutants (see Section 4.1, Air Quality), in that GHG emissions from a specific project do not cause direct adverse localized human health effects. Rather, the direct environmental effect of GHG emissions is the cumulative effect of an overall increase in global temperatures, which in turn has numerous indirect effects on the environment and humans.

The Intergovernmental Panel on Climate Change (IPCC) completed a Fifth Assessment Report (AR5) in 2014 that contains information on the state of scientific, technical, and socio-economic knowledge about climate change. The AR5 includes working group reports on the basics of the science, potential impacts and vulnerability, and mitigation strategies. Global climate change has caused physical, social, and economic impacts in California, such as land surface and ocean warming, decreasing snow and ice, rising

sea levels, increased frequency and intensity of droughts, storms, and floods, and increased rates of coastal erosion.

The potential of a gas or aerosol to trap heat in the atmosphere is called global warming potential (GWP). The GWP of different GHGs varies because they absorb different amounts of heat. CO₂, the most abundant GHG, is used to relate the amount of heat absorbed to the amount of the gas emissions; this is referred to as CO₂e, which is the amount of GHG emitted multiplied by the GWP. The GWP of CO₂, as the reference GHG, is 1. Methane has a GWP of 25; therefore, 1 pound of methane equates to 25 pounds of CO₂e.

California regulates GHGs, including CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆. California is a substantial contributor to global GHG emissions. In 2022, the annual California statewide GHG emissions were 371.1 million metric tons of CO₂ equivalent (MMTCO₂e). The transportation sector accounts for approximately 39 percent of statewide GHG emissions. The industrial and electric power sectors account for approximately 22 percent and 16 percent, respectively, of total statewide GHG emissions. The dominant GHG emitted is CO₂, primarily from fossil fuel combustion (CARB, 2024a).

4.4.2. Applicable Regulations, Policies, and Standards

4.4.2.1. Federal

United States Environmental Protection Agency GHG Mandatory Reporting Program (40 [Code of Federal Regulations] CFR Part 98)

This rule requires mandatory reporting of GHG emissions for industrial facilities and power plants that emit more than 25,000 metric tons of CO₂e (MTCO₂e) per year. Currently, there are no federal regulations limiting GHG emissions from the types of sources that would occur with the proposed Project.

4.4.2.2. State

Global Warming Solutions Act of 2006

In 2006, the California State Legislature signed the Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), which provides the framework for regulating GHG emissions in California. This law requires the California Air Resources Board (CARB) to design and implement emission limits, regulations, and other measures such that statewide GHG emissions are reduced in a technologically feasible and cost-effective manner to 1990 levels by 2020. The statewide 2020 emissions limit is 431 MMTCO₂e (CARB, 2024b) and, based on the statewide inventory presented in Section 4.4.1, this limit has been successfully achieved.

California Governor's Executive Orders on GHG Emissions

In September 2018, Executive Order B-55-18 established a new statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. CARB was directed to develop the framework for implementing the goal of carbon neutrality. Executive Order B-30-15 (April 2015) established a California GHG reduction target of 40 percent below 1990 levels by 2030. One purpose of this interim target is to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050 (Executive Order S-3-05, June 2005). This executive order also specifically addresses the need for climate adaptation and directs state agencies to update the California Climate Adaptation Strategy to identify how climate change will affect California infrastructure and industry and what actions the state can take to reduce the risks posed by climate change. Senate Bill (SB) 32 of 2016 codified this GHG emissions target to 40 percent below 1990 levels by 2030.

Climate Change Scoping Plan

In California, CARB is the primary agency responsible for providing information on implementing the GHG reductions required by the State pursuant to AB 32, the Global Warming Solutions Act of 2006, and its

2016 update, SB 32. Together, these laws require CARB to develop regulations that reduce GHG emissions to 1990 levels by 2020 and to 40percent below 1990 levels by 2030. CARB developed and approved its first Scoping Plan in 2008 which described its approach to meeting the AB 32 goal.

After enactment of SB 32, CARB's latest adopted plan is the 2022 Scoping Plan for Achieving Carbon Neutrality. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045 (CARB, 2022). This path includes strategies for reducing California's dependency on petroleum (for example, electrifying the transportation sector) and minimizing the use of chemicals and refrigerants with high GWPs (CARB, 2022).

Cap-and-Trade Program (17 CCR 95801 to 96022)

The California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation (Cap-and-Trade Program) was initially approved by CARB in 2011. The Cap-and-Trade Program applies to covered entities that fall within certain source categories, including petroleum refiners and suppliers of transportation fuels, and is triggered when facility emissions exceed 25,000 MTCO₂e in a year. The covered entities must hold compliance instruments sufficient to cover the actual GHG emissions, as evidenced through the CARB's Mandatory Reporting Regulation requirements. This means that transportation fuel suppliers bear the GHG compliance obligation in the Cap-and-Trade Program for the GHG emissions from motor vehicle and off-road equipment fuels used by construction workforces and crews.

Title 24 Green Building Standards

Title 24 Green Building Standards, known as CALGREEN, are part of California's building code that includes mandatory and voluntary measures to improve energy efficiency, water conservation, indoor air quality, and the use of sustainable materials in new construction and alterations. The code covers both residential and non-residential buildings and is updated by the California Energy Commission every three years. (Energy efficiency reduces GHG emissions by lowering the demand for energy, which in turn decreases the amount of fossil fuels needed for its production.)

4.4.2.3. Regional

South Coast Air Quality Management District (SCAQMD)

The SCAQMD is responsible for air quality planning and regulation in the South Coast Air Basin (SCAB). In 2008, the SCAQMD formed a working group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB and developed different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold. The working group has not provided additional guidance since the release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, the project would not have significant GHG emissions.
- Tier 3 attempts to identify small projects that would not likely contribute to significant cumulative GHGs. A project's construction emissions are averaged over 30 years and are added to the project's

operational emissions. If a project's emissions are below one of the following screening thresholds, then the project's impacts would be less than significant:

- Residential and commercial land use (including industrial parks, warehouses, etc.): 3,000 MTCO₂e per year (/yr)
- Industrial land use: 10,000 MTCO₂e/yr

■ Tier 4 has the following options:

- Option 1: Reduce Business-as-Usual (BAU) emissions by 30 percent.
- Option 2: Early implementation of applicable AB 32 Scoping Plan measures
- Option 3: This compliance option consists of establishing sector based performance standards. For example, it may be possible to use the 1990 inventory required under AB 32 to establish an efficiency standard such as pounds per person, pounds per worker, pounds per square feet, pounds per item manufactured, etc. When calculating GHG emissions from a project, if estimated emissions are less than the established efficiency standard, the project's impacts would not be significant relative to GHG emissions, while projects exceeding the efficiency standard would have significant impacts.

- Under Tier 5, the lead agency would quantify GHG emissions from the project and the project proponent would implement offsite mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level. In addition, the project proponent would be required to provide offsets for the life of the project, which is defined as 30 years. If the project proponent is unable to obtain sufficient offsets, incorporate design features, or implement GHG reduction mitigation measures to reduce GHG emission impacts to less than the screening level, then GHG emissions from the project would be considered significant.

SCAQMD Rules and Regulations

The following SCAQMD rule is applicable to the proposed Project:

- **Rule 2305 – Warehouse Indirect Source Rule.** The SCAQMD adopted Rule 2305, the Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, on May 7, 2021. WAIRE is an indirect source rule that regulates warehouse facilities to reduce emissions from the goods movement industry. Warehouses 100,000 square feet or larger are required to directly reduce oxides of nitrogen (NO_x) and particulate matter (PM) emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. While not the target of this regulation, GHG emission reductions would be realized with the implementation of zero-emission and/or near-zero emissions trucks, solar panels, and electric vehicle (EV) chargers. Rule 316 (Fees for Rule 2305) provides authority for the SCAQMD to establish fees to fund Rule 2305 compliance activities; these fees are paid by owners and operators of facilities subject to Rule 2305 and allow the SCAQMD to recover the cost of implementing Rule 2305.

4.4.2.4. Local

City of Torrance General Plan

The City of Torrance General Plan includes goals and policies to address climate change by reducing GHG emissions. The main categories associated with addressing climate change in urban areas in the General Plan are associated with lowering transportation emissions, encouraging energy efficiency and conservation, addressing the urban heat island effect, and encouraging recycling.

City of Torrance Climate Action Plan

The City of Torrance Climate Action Plan (CAP) is a strategic framework prepared by the City of Torrance in coordination with the South Bay Cities Council of Governments (SBCCOG) designed to reduce GHG emissions and enhance sustainability within the city. The Torrance City Council adopted the CAP on December 12, 2017. The plan sets ambitious targets for GHG reductions, aiming for a 15 percent reduction from 2005 levels by 2020 and a 49 percent reduction by 2035.

The City of Torrance CAP identifies policies and actions to reduce GHG emissions from 5 main categories: land use and transportation, energy efficiency, energy generation, solid waste, and urban greening. Land use and transportation is the category that encompasses the proposed Project. Potentially applicable goals and measures include the following:

- Goal LUT: A – Accelerate the Market for EV Vehicles
 - Measure LUT : A1 – EV Charging Policies.
- Goal LUT: C – Encourage Transit Usage
 - Measure LUT: C2 - Expand transit network
 - Measure LUT: D2 - Improve design of development
 - LUT: D2.3 Require new developments to provide pedestrian, bicycle, and transit amenities.
 - Measure LUT: E2 - Implement commute trip reduction programs
 - LUT: E2.1 Implement a (voluntary) commute trip reduction program.
 - LUT: E2.2 Implement an employee education program.
 - Measure LUT: E3 - provide car-sharing programs
 - LUT: E3.1 Implement a car-sharing program.

4.4.3. Environmental Impacts Analysis and Mitigation

4.4.3.1. Impact Analysis Approach

All construction- and operation-related emissions are quantified based on the best available forecast of Project activities. The activity assumptions, emission factors, and resulting quantities of emissions appear in the Applicant's Greenhouse Gas Analysis (Urban Crossroads, 2024b; Appendix G). Construction emissions from off-road construction equipment, portable generators, and fugitive dust were estimated using the methodologies and emission factors described in the California Emissions Estimator Model (CalEEMod v.2022) User's Guide (CAPCOA, 2022). Further information regarding construction schedule, equipment used during construction, vehicle trips, and earthwork, is found in the Applicant's Air Quality Impact Analysis which was independently reviewed by the City and deemed to be acceptable (Urban Crossroads, 2024a; Appendix D). Operation and maintenance GHG emissions were also evaluated using CalEEMod and the methodologies described in the CalEEMod User's Guide. Operational emissions include six main categories: area source emissions, energy source emissions, mobile source emissions, stationary source emissions, transportation refrigeration units, and on-site cargo equipment emissions.

4.4.3.2. Significance Criteria

Project impacts related to GHG emissions were evaluated against the CEQA significance criteria and are discussed in the following sections. The impact analysis evaluates potential proposed Project impacts during the construction phase and the operation and maintenance phase. The significance criteria listed below are based on Appendix G of the CEQA Guidelines.

Would the proposed Project:

- GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- GHG-2: Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

For determining the significance of the impact on the environment caused by GHG emissions, the proposed Project GHG emissions are compared with a screening threshold of 3,000 MTCO₂e/year drawn from draft guidance as developed by the SCAQMD staff for residential and commercial land uses (including industrial parks and warehouses), as discussed in Section 4.4.2.3 (SCAQMD, 2008).

4.4.3.3. Environmental Impact Analysis

As described in Section 2, Project Description, the proposed Project would include developing a Class A industrial warehouse building, including 15,000 square feet of office space on 31.3 acres of currently vacant land. The proposed building would include 56 dock doors on the northeastern portion of the building. The proposed Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. The proposed Project also includes future road improvements (including installation of a sewer line) along Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court, totaling an additional 7.79 acres.

There are two primary categories of GHG impacts that would occur as a result of the proposed Project. The first category would be impacts associated with Project construction, including the use of construction equipment on the Project site, and off-site construction traffic on roadways providing access to the Project site. During construction activities, a number of vehicles would be traveling to and from the Project site, including trucks delivering materials to the Project site, trucks transporting waste material away from the site, and construction workers' vehicles commuting to and from the Project site. The second category of GHG impacts would be the impacts associated with operation and maintenance of the proposed Project after construction is complete.

Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

LESS THAN SIGNIFICANT WITH MITIGATION. Construction-phase activities include mobilizing vehicles and equipment for construction, crews, and materials. The site work would include site preparation, remediation, grading, building construction, and paving. These activities during construction would cause GHG emissions due to fuels used by the construction vehicles and equipment. Diesel and gasoline-powered construction equipment would include trucks for materials and crews, and the following types of equipment: cranes, dozers, graders, excavators, loaders, and tractors. Equipment and motor vehicles would directly emit CO₂, CH₄, and N₂O due to fuel use and combustion, and motor vehicle fuel combustion emissions in terms of CO₂e are approximately 95 percent CO₂, and CH₄ and N₂O emissions occur at rates of less than 1 percent of the mass of combustion CO₂ emissions.

The resulting one-time aggregate quantity of GHGs emitted during the 35-month period of construction would be approximately 2,862 MTCO₂e (Urban Crossroads, 2024b; Appendix G), based on use of CalEEMod v.2022. Further information regarding construction schedule, equipment used during construction, vehicle trips, and earthwork, is found in the Applicant's GHG report which was independently reviewed by the City and deemed to be acceptable (Urban Crossroads, 2024b; Appendix G). The estimated emissions include offroad construction equipment, on-road vehicles including worker commuter vehicles, material and equipment transport trucks, vendor delivery trucks, and construction support vehicles. Table 2-1, Construction Schedule, in Section 2, Project Description, represents the duration of construction activity

for each construction phase. The estimated off-road construction equipment to be used is shown in Table 2-2, Construction Equipment Fleet. For construction phase proposed Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions (SCAQMD, 2008). As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions for the proposed Project would be approximately 95.4 MTCO₂e/yr, which would not exceed significance thresholds and would be less than significant.

Operation phase activities associated with the proposed Project include emissions from area sources, energy sources, mobile sources, stationary sources, on-site cargo equipment, transportation refrigeration units (TRUs), water treatment, solid waste, and refrigerants.

Table 4.4-1. Unmitigated GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	92.93	0.00	0.01	0.06	95.40
Mobile Source	3,493.86	0.15	0.25	4.42	3,575.30
Area Source	8.17	0.00	0.00	0.00	8.20
Energy Source	412.63	0.04	0.00	0.00	415.03
Water Usage	132.88	3.04	0.07	0.00	230.75
Waste	33.80	3.38	0.00	0.00	118.27
Refrigerants	0.00	0.00	0.00	6.80	6.80
Stationary Source	19.04	0.00	0.00	0.00	19.10
TRU Source	0.00	0.00	0.00	0.00	141.78
On-Site Equipment	0.00	0.00	0.00	0.00	94.73
Total MTCO ₂ e (All Sources)					4,705.37
Threshold					3,000
Exceedance?					Yes

Note: MT/yr = metric tons per year; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent; MTCO₂e = metric tons of carbon dioxide equivalent; TRU = transport refrigeration unit

Source: Urban Crossroads, 2024b (Appendix G)

Total unmitigated yearly GHG emissions would be 4,705 MTCO₂e/yr, which would exceed the applicable threshold of 3,000 MTCO₂e/yr. Mitigation measures GHG-1a through GHG-1d would include design features and operational restrictions to reduce GHG. However, these measures would not achieve quantifiable reductions, as modeled in CalEEMod, and as such, to provide a conservative estimate of emissions from the proposed Project, no reductions in emissions are assumed to occur with implementation of these measures. With the implementation of MM GHG-1e, all operational off-road equipment would be equipped with zero-emission engines, which provides a quantifiable decrease in emissions, as shown in Table 4.4-2.

Table 4.4-2. Mitigated GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	92.93	0.00	0.01	0.06	95.40
Mobile Source	3,493.86	0.15	0.25	4.42	3,575.30
Area Source	8.17	0.00	0.00	0.00	8.20
Energy Source	412.63	0.04	0.00	0.00	415.03
Water Usage	132.88	3.04	0.07	0.00	230.75
Waste	33.80	3.38	0.00	0.00	118.27
Refrigerants	0.00	0.00	0.00	6.80	6.80
Stationary Source	19.04	0.00	0.00	0.00	19.10
TRU Source	0.00	0.00	0.00	0.00	141.78
Total MTCO ₂ e (All Sources)					4,610.63
Threshold					3,000
Exceedance?					Yes
Yearly Exceedance					1,610.63

Note: MT/yr = metric tons per year; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent; MTCO₂e = metric tons of carbon dioxide equivalent; TRU = transport refrigeration unit

Source: Urban Crossroads, 2024b (Appendix G)

With the implementation of Mitigation Measure (MM) GHG-1e, total annual GHG emissions for the proposed Project would be approximately 4,611 MTCO₂e/year. This is approximately 1,611 MTCO₂e over the 3,000 MTCO₂e SCAQMD interim threshold the City of Torrance has deemed appropriate for industrial projects. Because the mitigated GHG emissions shown in Table 4.4-2 would remain over the threshold of significance after implementation of MM GHG-1a through MM GHG-1e, additional mitigation options must be evaluated for feasibility. Local lead agencies responsible for land use decisions may require project proponents to fund or implement offsite mitigation (GHG reduction projects) or purchase and retire carbon offset credits (CARB, 2022). In order to reduce impacts to less than significant, the SCAQMD Tier 5 approach of quantifying GHG emissions from the Project and implementing offsite mitigation (GHG reduction projects) or purchasing offsets to reduce GHG emission impacts to less the applicable threshold is proposed via MM GHG-1f.

MM GHG-1f (Reduce GHG Emissions or Surrender Offset Credits) is recommended to reduce or offset Project-related GHG emissions to avoid a significant impact on the environment as follows:

- Avoid onsite GHG emissions created by improving the efficiency of operations or avoiding on-site use of diesel fuel, gasoline, and other fossil fuels, for example, by electrification of equipment; or
- Cause GHG reductions or carbon sequestration to occur off site, as represented by GHG reduction, carbon sequestration projects, or offset credits. GHG emission reductions shall be secured by purchasing and retiring offset credits from CARB-approved offset project registries, Climate Forward Forecast Mitigation Units, or similar GHG reduction/carbon sequestration supplies that are consistent with requirements specified in the State CEQA Guidelines, and case law. Other examples of off-site GHG mitigation appear in Section 4.1.2 of Appendix D of the CARB 2022 Scoping Plan Update (CARB, 2022) including: local urban forestry; local building retrofit programs; offsite electric vehicle chargers; and public transit subsidies.

MM GHG-1f requires the Applicant to demonstrate, prior to issuance of a certificate of occupancy, that verified offset credits have been secured and surrendered in an amount equal to the total Project emissions offset required for the 30-year useful life. Successful implementation of the mitigation would need to demonstrate that reductions are real, additional, permanent, quantifiable, and independently verified consistent with CEQA Guidelines. With mitigation, the rates of GHG emissions during operation of the proposed Project could feasibly be reduced or offset such that impacts would be less than significant.

Impact GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the greenhouse gas emissions.

LESS THAN SIGNIFICANT WITH MITIGATION. The following sections discuss the proposed Project's consistency with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. As discussed under Impact GHG-1, GHG emissions during construction would not exceed significance thresholds; therefore, construction GHG emissions would not conflict with any plans, policies, or regulations adopted for the purpose of reducing GHG emissions and impacts would be less than significant. The following sections primarily address impacts from operational GHG emissions.

Cap-and-Trade Program

California's Cap-and-Trade regulation is the major climate program covering proposed Project-related GHG emissions. Construction and Operation and Maintenance (O&M) activities would cause GHG emissions due to fuels used by vehicles and equipment. The end-users of motor vehicle fuels like gasoline and diesel may include construction contractors that are not otherwise designated as covered entities in the Cap-and-Trade program, and these do not directly bear the Cap-and-Trade compliance obligation. However, all fuel suppliers, including refiners and pipeline companies, must cover the end-user's GHG emissions. Because the proposed Project-related GHG emissions, including construction-phase emissions and the operational-phase mobile source emissions, would be "covered" by the fuel suppliers subject to Cap-and-Trade requirements, these emissions would not conflict with California's progress towards achieving GHG reductions.

2022 Scoping Plan

Assessing the proposed Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Construction and O&M of the proposed Project would be required to comply with all applicable current and future regulatory requirements of the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance or through vehicle owners complying with enforceable provisions of fleet-wide standards and fuel standards) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer Rule, Clean Off-Road Fleet Recognition Program, In-Use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. Additionally, as discussed under Impact GHG-1, with implementation of MM GHG-1a through MM GHG-1f, operational GHG emissions would be reduced or offset to a level that would not have a significant impact on the environment, and as such, O&M of the proposed Project would not conflict with the 2022 Scoping Plan with implementation of these measures.

City of Torrance CAP

The City of Torrance CAP identifies a GHG reduction target for future years, and provides policies and actions to reduce GHG emission from transportation, energy, land and water use, and waste. The CAP is also consistent with GHG emissions reduction strategies and policies of the State of California and policies

implemented by SBCCOG. In regard to growth projections, the General Plan Land Use designation of the Project Site is "Heavy Industrial" (HI). The proposed Project consists of a development totaling 403,033 square feet with 362,730 square feet of High-Cube Fulfillment Center (90% of the total square footage) and 40,303 square feet of High-Cube Cold Storage Warehouse (10% of the total square footage). The proposed uses by the Project are permitted and no General Plan Land Use Amendment or Zone Change would be required to implement the Project. Since the proposed use of the Project site is consistent with the General Plan Land Use Designation for the site and projected buildout conditions presented in the General Plan, the proposed Project would not result in GHG emissions beyond those considered in the CAP.

All development in the City, including the proposed Project, is required to conform to all City-adopted policies including those presented in the CAP. The City, through established design and development review processes, would ensure that applicable CAP GHG-reducing strategies would be incorporated in the proposed Project. The proposed Project would also be consistent with the City's CAP goal of increasing energy efficiency in new commercial buildings by complying with the most current Title 24 Green Building Standards (energy efficiency reduces GHG emissions by lowering the demand for energy, which in turn decreases the amount of fossil fuels needed for its production).

With implementation of mitigation measures GHG 1a -1f, design features, operational restrictions, and off-site reductions would be included with the Project to ensure that O&M of the proposed Project would be consistent with all applicable plans, policies, and regulations adopted for the purpose of reducing GHGs. As such, operational impacts would be less than significant with mitigation.

4.4.3.4. Mitigation Measures

- GHG-1a** **Reduce Vehicle Idling.** Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include:
- (a) instructions for truck drivers to shut off engines when not in use;
 - (b) instructions for drivers of diesel trucks to restrict idling to no more than five (5) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and
 - (c) telephone numbers of the building facilities manager and CARB to report violations. Prior to the issuance of an occupancy permit, the City shall conduct a site inspection to ensure that the signs are in place.
- GHG-1b** **Provide Documentation for Clean Engine Incentives.** Prior to tenant occupancy, the Project Applicant or successor in interest shall provide documentation to the City demonstrating that occupants/tenants of the Project site have been provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
- GHG-1c** **Provide EV Charging Stations.** Final Project designs shall provide for installation of conduit in tractor trailer parking areas for the purpose of accommodating potential installation of EV truck charging stations.
- GHG-1d** **Electrify Truck and Dock Bays.** All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric transport refrigeration units (TRUs).
- GHG-1e** **Use Zero-Emission On-Site Equipment.** All on-site outdoor cargo-handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site

equipment) and all on-site indoor forklifts will be zero-emission powered engines (electric powered or equivalent).

GHG-1f

Reduce GHG Emissions or Surrender Offset Credits. The Applicant or its designee shall reduce or offset annual incremental greenhouse gas (GHG) emissions from Project-related sources. The incremental GHG emissions are those GHG emissions resulting from operational activities, including transportation, during the life of the proposed Project. These incremental emissions are estimated to be less than or equal to 48,330 metric tons of carbon dioxide equivalent (MTCO₂e) total over the 30-year useful life of the Project..

- The Applicant or its designee demonstrate, prior to issuance of a certificate of occupancy, that verified offset credits have been secured and surrendered in an amount equal to the total Project emissions offset required for the 30-year useful life.
- Offset credits shall be sourced from recognized voluntary carbon registries commonly relied upon for CEQA mitigation, including American Carbon Registry (ACR), Climate Action Reserve (CAR), or Verra, without geographic restriction.:
 - Projects must demonstrate that reductions are real, additional, permanent, quantifiable, and independently verified consistent with CEQA Guidelines. GHG reductions generated or carbon sequestrations by implementing a GHG reduction project consistent with a methodology or accounting protocol that is equal to or more rigorous than CARB protocol requirements under 17 CCR 95972. The protocol for achieving reductions must determine the extent to which GHG emission reductions and GHG removal enhancements are achieved by the GHG reduction project and must establish a GHG reduction project baseline and demonstrate that the reduction of GHG emissions is real, permanent, quantifiable, verifiable, enforceable, and additional. For the purposes of this mitigation measure, the definitions of 17 CCR 95802(a) shall apply. Note that enforceable, as defined in 17 CCR 95802(a), is specific to CARB's Cap-and-Trade regulatory program, where CARB holds enforcement authority. This mitigation measure would generate GHG reductions outside of CARB enforcement authority. Therefore, enforceable is modified to mean in this context that the GHG reduction project generating the GHG offset must be owned by a single entity and must be backed by a legal instrument or contract that defines exclusive ownership.
 - GHG reductions from voluntary-market registry offset credits listed with and verified by: (1) one of the following CARB-approved Offset Project Registries: American Carbon Registry (ACR); Climate Action Reserve (CAR); or Verra, formerly Verified Carbon Standard. "Offset Project Registry" has the same definition as that set forth in Section 95802 of Title 17 of the California Code of Regulations (17 CCR 95802); (2) Climate Forward; or (3) GHG reduction/carbon sequestration supplies that are consistent with requirements specified in the State CEQA Guidelines and case law.
- Offset credits shall be surrendered on a schedule approved by the City, with full satisfaction demonstrated prior to occupancy.
- The City shall verify documentation of registry-issued and retired credits prior to their use as mitigation.

4.4.4. Cumulative Impact Analysis

Geographic Extent/Context

Because the direct environmental effect of GHG emissions is influence on global climate change, GHG emissions are by nature inherently a cumulative concern with a cumulatively global scope. Therefore, the geographic extent of the Project's cumulative area of impact would be worldwide.

Cumulative Impact Analysis

The analysis quantifies and discloses GHG emissions consistent with SCAQMD CEQA Guidelines. Because construction-related GHGs would occur early in the overall Project lifespan, total GHG emissions from construction were amortized over a typical project lifespan of 30 years and added to operational emissions for comparison to the significance threshold of 3,000 MTCO₂e per year. The proposed Project's construction-phase amortized GHG emissions when added to the anticipated change in operational emissions would equate to a rate of 4,611 MTCO₂e/yr. With implementation of mitigation measures GHG-1a through MM GHG-1f, operational emission rates would be mitigated to a net rate of 3,000 MTCO₂e/yr. At this level, the combined effects of construction and operation would not represent a cumulatively considerable contribution to the global atmosphere.

4.4.5. Summary of Significance Findings

Table 4.4-3 provides a summary of each identified GHG impact and associated mitigation measures to reduce or avoid the impact (where warranted). Mitigation measures are required for each significant impact but are not required for impacts that are not significant.

Table 4.4-3. Summary of GHG Impacts and Mitigation Measures

Impacts	Mitigation Measures
Impact GHG-1: Conflict with or obstruct implementation of an applicable air quality plan.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant with Mitigation	GHG-1a Reduce Vehicle Idling GHG-1b Provide Documentation for Clean Engine Incentives GHG-1c Provide EV Charging Stations GHG-1d Electrify Truck and Dock Bays GHG-1e Use Zero-Emission On-Site Equipment GHG-1f Reduce GHG Emissions or Surrender Offset Credits
Impact GHG-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant with Mitigation	GHG-1a Reduce Vehicle Idling GHG-1b Provide Documentation for Clean Engine Incentives GHG-1c Provide EV Charging Stations GHG-1d Electrify Truck and Dock Bays GHG-1e Use Zero-Emission On-Site Equipment GHG-1f Reduce GHG Emissions or Surrender Offset Credits

4.5. Geology, Soils, and Paleontological Resources

This section provides an assessment of whether the Project would directly or indirectly cause potential substantial adverse effects due to rupture of a known earthquake fault, seismic ground shaking, or liquefaction; result in substantial erosion or loss of topsoil; be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off- site landslide, lateral spreading, subsidence, liquefaction, or collapse; be located on expansive soil, creating substantial direct or indirect risks to life and property; or directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The following discussion is based on the Geotechnical Design Update and Supplemental Geotechnical Exploration prepared by Leighton Consulting, Inc. (2023 and 2019), included as Appendix H and Appendix I, and the Response Plan and Soil Management Plan (SMP), included as Appendix C (SCS Engineers, 2025a and 2025b), unless otherwise referenced. The proposed Project's potential effects on geology, soils, and paleontological resources were evaluated using the criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are discussed in more detail in Section 4.5.3.3, Environmental Impact Analysis. The analysis concludes that the proposed Project impacts associated with geology, soils, and paleontological resources would be less than significant with mitigation.

No scoping comments were received regarding geology, soils, or paleontological resources during the public scoping period for the proposed Project.

4.5.1. Environmental Setting

Regional Geology

The Project site is located within the Peninsular Ranges geomorphic province of California, at the western margin of the Los Angeles Basin, a broad gently seaward-sloping coastal plain. The site has been mapped at the eastern margin of "older, stabilized dune and drift sand – mostly unconsolidated fine-grained sand" (Qos) (Leighton, 2023). There are no known geologic discontinuities on this site, and there are no significant natural slopes.

Soils

The central portion of the Project site has reportedly been an earth borrow source for berms and other earthwork on the adjacent Torrance Oil Refinery (Refinery), and approximately 7 acres in the northwestern portion of this site has been used as a disposal area for ceramic catalyst-beads and other debris, which were observed during a July 10, 2019 site visit. These areas are shown in Figure 2 in Appendix C, Soil Management Plan (SCS Engineers, 2025b).

During a 2019 field survey, horse stables were covering approximately 1 to 2 acres in the southeastern portion of the Project site, which have since been moved to an adjacent parcel to the south of the Project, as a condition of the sale of the parcel to the Applicant. Otherwise, the Project site had an undeveloped surface. According to the 1934 "Torrance" USGS Quadrangle, the northeast central portion of the site adjacent to the railroad was the lowest point on this parcel, roughly 75 feet above mean sea level (msl). Since then, the borrow pit had been excavated down to roughly 60 feet above msl in the central portion of this site. Extrapolation and interpolation of prior reported subsurface conditions, in addition to conditions exposed in five current test pits, show undocumented fill extending underneath the central area of this borrow pit down to elevation 54 feet. Encountered fill was highly variable but consisted predominantly of a black "fat" (high plasticity, CH) clay that was expansive with a fuel hydrocarbon odor. Some small amounts of encountered fill contained trace organics. Fill had also been placed in a separate area in the northwestern portion of the site.

Based on the Geotechnical Design Update (Leighton, 2023), site sands in the remaining portion of the Project site are non-expansive and have desirable consolidation characteristics (compared to clay) when properly compacted. However, the City of Torrance is known to have undesirable highly expansive clays not far from the Project site. Such clays are undesirable due to adverse expansion and consolidation characteristics, and will consolidate slower over time relative to sand. Therefore, the import of clays to the site must be avoided. If it is absolutely unavoidable to import clays to the site, they must be placed within the pit at least 15 feet below finish grade. The Geotechnical Design Update recommends that site finish grades be lowered to provide more balanced earthwork requiring less import.

Seismic Hazards

Torrance is in a highly active earthquake zone with the 750-mile-long San Andres Fault well within range to cause considerable effects (City of Torrance, 2024). In addition, the City of Torrance is bounded on the southwest by the Palos Verdes Fault and the Newport-Inglewood Fault on the west. Both faults are less than 5 miles from the City of Torrance. The Palos Verdes Fault runs to the west of the Newport Inglewood Fault along the Palos Verdes Peninsula. The fault is located along the hills of the peninsula and extends out to sea along Hermosa and Manhattan Beach. Other faults running through the South Bay area are the Redondo Canyon and Torrance Wilmington thrust faults, both of which can generate quakes with a magnitude in the 6.0 to 6.5 range (City of Torrance, 2024).

As is the case for most of southern California, strong ground shaking has and will affect this site. However, the Project site is not located within a currently-designated Alquist-Priolo Earthquake Fault Zone of potential surface fault rupture, or a zone of potential seismically-induced liquefaction (Leighton, 2019).

Soil liquefaction results from the loss of strength during cyclic loading, such as imposed by earthquakes. Soils most susceptible to liquefaction are clean, loose, saturated, uniformly-graded, fine-grained sands. As shown on the March 25, 1999 Official Map of Seismic Hazard Zones for the Torrance Quadrangle, the Project site is not within a mapped potential liquefaction hazard zone. Furthermore, since groundwater occurs at depths greater than 60 feet on the site, which is not considered shallow groundwater, the Project site does not have conditions that would result in seismically-induced liquefaction (Leighton, 2019).

If near-surface soils vary in composition both vertically and laterally, strong earthquake shaking can cause non-uniform compaction of soil strata, resulting in movement of near-surface soils. Local strong ground shaking will cause differential dynamic compaction, where some parts of the ground compact more than others. This can lead to uneven settlement and potential damage to structures, which is possible on the Project site due to the undocumented fill in the borrow pit, consisting of clay, in contrast to the relatively dense native sands in the remaining portions of the Project site (Leighton, 2023).

Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying alluvial material (i.e., sediment deposited by running water, typically rivers or streams) toward an open or “free” face such as an open body of water, channel, or excavation. Generally in soils, this movement is due to failure along a weak plane, and may often be associated with liquefaction. Since the Project site does not have the conditions for liquefaction, and the site would furthermore be graded relatively flat, the Project site would not have conditions conducive for lateral spreading (Leighton, 2019).

The Project site includes two separate areas in the northwestern portion of the site that are designated with a low possibility of landslides as shown on the US Landslide Inventory and Susceptibility map, which is based on terrain features; in addition, the majority of the Project site is shown on the map as having a negligible risk of landslides (USGS, 2025). Furthermore, areas that are vulnerable to potential landslides have not been identified within the Project site, as discussed in the City of Torrance Local Hazard Mitigation Plan (City of Torrance, 2024).

Paleontological Resources

Qos (Older Sands, generally Pleistocene in age, or 2.6 million to 1,700 years ago) fine-grained sand in Los Angeles County does have potential for paleontological resources. Fine-grained sand, especially in sedimentary formations like Qos, can preserve fossils of various organisms, including vertebrate and invertebrate remains. In addition, fossil localities have been recorded previously within the Qos unit (Michael Baker International, 2021).

4.5.2. Applicable Regulations, Policies, and Standards

4.5.2.1. Federal

No specific federal regulations related to geology and soils are applicable to the Project. In addition, while paleontological resources on public lands are protected by the Paleontological Resources Preservation Act (PRPA) and the Code of Federal Regulations (CFR) (43 CFR Part 49), no specific federal regulations related directly to paleontology apply to the Project.

4.5.2.2. State

Alquist-Priolo Act

The principal State guidance relating to geologic hazards is contained in the Alquist-Priolo Act (Public Resources Code [PRC] 2621 et seq.) and the Seismic Hazards Mapping Act of 1990 (PRC 2690-2699.6). The Alquist-Priolo Act prohibits the location of most types of structures for human occupancy across active traces of faults in earthquake fault zones, shown on maps prepared by the state geologist, and regulates construction in the corridors along active faults (earthquake fault zones). Earthquake fault zones are regulatory zones around active faults designated by the State. The zones vary in width, but average about 0.25 mile wide (California Department of Conservation, 2023).

Seismic Hazards Mapping Act of 1990

The Seismic Hazards Mapping Act of 1990 focuses on hazards related to strong ground shaking, liquefaction, and seismically-induced landslides. Under its provisions, the state is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards. The maps are to be used by cities and counties in preparing their general plans and adopting land use policies to reduce and mitigate potential hazards to public health and safety.

California Building Code

The California Building Code (CBC), codified in Title 24 California Code of Regulations, encompasses a number of requirements related to geologic issues, including Part 2, Volume 2, Chapter 18, Soils and Foundations, which outlines the minimum standards for structural design and construction. The CBC augments and supersedes the Uniform Building Code with stricter requirements to reduce the risks associated with building in seismic areas to the maximum extent practicable. The CBC is modeled after the International Building Code and sets standards for the investigation and mitigation of site conditions related to fault movement, liquefaction, landslides, differential compaction/seismic settlement, ground rupture, ground shaking, and seismically-induced flooding.

National Pollutant Discharge Elimination System

In accordance with Clean Water Act Section 402, which regulates stormwater discharges under the National Pollutant Discharge Elimination System (NPDES) program, the California State Water Resources Control Board (SWRCB) adopted a Construction General Permit.

The Construction General Permit is applicable to all stormwater discharges associated with construction activity. The NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (the Construction General Permit) was adopted on September 8, 2022, and became effective on September 1, 2023 (SWRCB, 2022). The main objectives of the Construction General Permit are to:

- Reduce erosion from construction projects or activities
- Minimize or eliminate sediment in stormwater discharges from construction projects
- Prevent materials used at a construction site from contacting stormwater
- Implement a sampling and analysis program to monitor construction site runoff
- Eliminate unauthorized non-stormwater discharges from the construction sites
- Implement appropriate measures to reduce potential impacts on waterways both during and after construction projects
- Establish maintenance commitments on post-construction pollution control measures

The Construction General Permit requirements apply to any construction project that results in the disturbance of at least one acre of land or that is part of a larger common development plan. Additionally, the General Construction Permit is required for related construction or demolition activities, including clearing, grading, grubbing, or excavation, or any other activity that results in greater than one acre of land disturbance.

4.5.2.3. Regional

Los Angeles Regional Water Quality Control Board

The Los Angeles Regional Water Quality Control Board (LARWQCB) is responsible for issuing the Los Angeles County Municipal Storm Water Permit (Order No. R4 2021 0105, NPDES Permit No. CAS004004). The existing permit covers the Los Angeles County Flood Control District (LACFCD), Los Angeles County, and 85 incorporated cities within the coastal watersheds of Los Angeles County (LARWQCB, 2021). The permit covers the permittees for contributions to discharges of stormwater and urban runoff from municipal separate storm sewer systems (MS4), also called storm drain systems. The discharges flow to water courses within LACFCD and into receiving waters of the Los Angeles region.

The objectives of MS4 permits are to effectively prohibit non-stormwater discharges through MS4s to the region's waterways, to reduce the discharge of pollutants in stormwater to the maximum extent practicable, and to implement other pollutant controls as necessary to achieve water quality standards (LARWQCB, 2021). Operators of regulated MS4s are required to develop a stormwater management plan (SWMP) that includes measurable goals and to implement needed stormwater management controls (e.g., best management practices [BMPs]). NPDES regulations require assessment and revision of the stormwater management program in order to continue, to the maximum extent practicable, to not cause or contribute to water quality standards exceedances. Stormwater program activities are continually adjusted based on the results of an effectiveness evaluation (EPA, 2008).

The current MS4 permit imposes basic programs, or minimum control measures, that mitigate stormwater quality issues. These programs include public information and participation, industrial/commercial inspection, planning and land development, construction, public agency activities, and illicit connection/discharge abatement. To illustrate, the implementation of temporary construction BMPs, such as erosion control and spill management and safe storage of fluids, are required under the development construction program. Post-construction stormwater BMPs are required for most public and private development under the planning and land development program. MS4 permit requirements would apply to Project operation and construction.

Additionally, due to the site's history of being used as an out-parcel ancillary to the Torrance Oil Refinery, there is a recognized environmental condition on the site. The site is the subject of Cleanup and Abatement Orders from the Los Angeles Regional Water Quality Control Board for releases at and from the Refinery (CAO Numbers 88-43, 89-136, and 95-116). A Response Plan and Soil Management Plan have been prepared and are under review by the LARWQCB (SCS Engineers, 2025a and 2025b). The Response Plan and SMP are included as Appendix C.

4.5.2.4. Local

City of Torrance General Plan

The City of Torrance General Plan (City of Torrance, 2010) outlines policies regarding geology and soil hazards in the Safety Element. The following objective and policy from the current General Plan Safety Element are relevant to the Project:

- Objective S.1: To protect the community from hazards related to earthquakes, seismic-related activity, and flooding
- Policy S.1.1: Adopt and strictly enforce the most recent State regulations governing seismic safety and structural design to minimize damage to structures from seismic or geologic hazards.

City of Torrance's Building Code

The City of Torrance's building code incorporates that California Building Code, which sets standards for the investigation and mitigation of site conditions related to fault movement, liquefaction, landslides, differential compaction/seismic settlement, ground rupture, ground shaking, and seismically-induced flooding.

City of Torrance Local Hazard Mitigation Plan

The City of Torrance Local Hazard Mitigation Plan (City of Torrance, 2024) guides hazard mitigation planning to better protect people and property of the City of Torrance from the effects of natural hazard events. The plan covers geohazards, earthquake and seismic hazards, and landslides.

4.5.3. Environmental Impacts Analysis and Mitigation

4.5.3.1. Impact Analysis Approach

The Project is assessed for impacts to geologic, soils, and paleontological resources for both construction and operational activities, with both single- and multi-tenant scenarios. The analysis below is applicable to both single and multi-tenant scenarios. The potential adverse impacts during construction are generally related to whether the Project would result in the failure of temporary structures and safety concerns from soil stability. The potential for erosion and loss of topsoil is related to soil disturbance during construction activities. A discussion of potential adverse impacts during operations generally addresses the safety of built elements relative to geologic stability, including safety concerns during an earthquake and exposure to secondary seismic hazards such as ground settlement or liquefaction. The potential for disturbance to paleontological resources is based on the type of geologic units, with specific formations and a sedimentary environment (consisting of rock formed from sediment deposited by water or air) more likely to contain fossil remains.

4.5.3.2. Significance Criteria

Project impacts related to geology, soils, and paleontological resources were evaluated against the CEQA significance criteria and are discussed in the following sections. The impact analysis evaluates potential

proposed Project impacts during the construction phase and the operation and maintenance phase. The significance criteria listed below are based on Appendix G of the CEQA Guidelines.

Would the proposed Project:

- **GEO-1:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?
- **GEO-2:** Result in substantial soil erosion or the loss of topsoil?
- **GEO-3:** Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- **GEO-4:** Be located on expansive soil, creating substantial direct or indirect risks to life or property?
- **GEO-5:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The focus of significance criterion GEO-1, which is addressed under Impact GEO-1 below, is on earthquake-related hazards, whereas unstable geologic units and soils are addressed under significance criterion GEO-3 and discussed under Impact GEO-3. Because landslides may occur as a result of an earthquake (Impact GEO-1), as well as from geologic units and soils that become unstable due to heavy rainfall, erosion, and construction activities (Impact GEO-3), potential landslide hazards could be discussed under both of these impact headings. To consolidate the discussion within this document, however, landslide hazards are addressed under Impact GEO-3 only, with an understanding that the discussion could also be generally applicable to seismic-related hazards addressed under Impact GEO-1.

Appendix G of the CEQA Guidelines also includes a significance criterion for a project site that has soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water. This significance criterion does not apply to the Project because no septic tanks or alternative waste water disposal systems are proposed for the Project site. All waste water would be disposed of through the City of Torrance sanitary sewer system, as discussed in Section 6.3.10, Utilities and Service Systems.

4.5.3.3. Environmental Impact Analysis

As described in Section 2, Project Description, the proposed Project would include developing a Class A industrial warehouse building, including 15,000 square feet of office space on 31.3 acres of currently vacant land. The proposed Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. The proposed Project also includes future road improvements (including installation of a sewer line) along Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court, totaling an additional 7.79 acres.

There are two primary categories of geology, soils, and paleontological resource impacts that would occur as a result of the proposed Project. The first category would be impacts associated with Project construction, including ground-disturbing activities that could cause soil erosion or disturb paleontological resources. The second category of geology and soils impacts would be the impacts associated with operation and maintenance of the proposed Project after construction is complete.

Impact GEO-1: Directly or indirectly cause potential substantial adverse effects due to rupture of a known earthquake fault, seismic ground shaking, or liquefaction.

Construction

LESS THAN SIGNIFICANT WITH MITIGATION. The proposed Project's impacts are discussed in the following sections.

Earthquake Fault Rupture

The Project site is not located within a currently-designated Alquist-Priolo Earthquake Fault Zone of potential surface fault rupture, or a zone of potential seismically-induced liquefaction (Leighton, 2019). No faults are located within 0.25 mile of the Project site. Therefore, Project construction would result in no impacts related to earthquake fault rupture.

Seismic Ground Shaking

Torrance is in a highly active earthquake zone with the 750-mile-long San Andres Fault well within range to cause considerable effects (City of Torrance, 2024). In addition, the City of Torrance is bounded on the southwest by the Palos Verdes Fault and the Newport-Inglewood Fault on the west. Both faults are less than 5 miles from the City of Torrance. The Palos Verdes Fault runs to the west of the Newport Inglewood Fault along the Palos Verdes Peninsula. The fault is located along the hills of the peninsula and extends out to sea along Hermosa and Manhattan Beach. Other faults running through the South Bay area are the Redondo Canyon and Torrance Wilmington thrust faults, both of which can generate quakes with a magnitude in the 6.0 to 6.5 range (City of Torrance, 2024).

As is the case for most of southern California, strong ground shaking has and will affect the Project site. Local strong ground shaking will cause differential dynamic compaction, where some parts of the ground compact more than others. This can lead to uneven settlement and potential damage to structures, which is possible on the Project site due to the undocumented fill in the borrow pit, consisting of clay, in contrast to the relatively dense native sands in the remaining portions of the Project site. This impact could be potentially significant without mitigation. Mitigation Measure GEO-1 would require compliance with the recommendations in the 2023 Geotechnical Design Update (Leighton, 2023), including the removal of undocumented fill and compaction of onsite native sands to avoid any potential hazards related to compromising the structural integrity of the proposed industrial building. Therefore, impacts from Project construction related to seismic ground shaking would be less than significant with mitigation.

Liquefaction

Soil liquefaction results from the loss of strength during cyclic loading, such as imposed by earthquakes. Soils most susceptible to liquefaction are clean, loose, saturated, uniformly-graded, fine-grained sands. As shown on the March 25, 1999 Official Map of Seismic Hazard Zones for the Torrance Quadrangle, the Project site is not within a mapped potential liquefaction hazard zone. Since there is no shallow groundwater at this site, the Project site does not have conditions that would lead to liquefaction (Leighton, 2019). Therefore, Project construction would result in no impacts related to liquefaction.

Operations and Maintenance

LESS THAN SIGNIFICANT WITH MITIGATION. As stated previously, the Project would result in no impacts related to earthquake fault rupture or liquefaction. Given the seismically active area of southern California, strong ground shaking has and will affect the Project site. As stated previously, with implementation of Mitigation Measure GEO-1, the removal of undocumented fill and compaction of onsite native sands during construction would avoid any potential hazards related to compromising the structural integrity of the proposed industrial building. Therefore, impacts from Project operations and maintenance related to seismic ground shaking would be less than significant with mitigation.

Impact GEO-2: Result in substantial erosion or loss of topsoil.**Construction**

LESS THAN SIGNIFICANT. Ground-disturbing activities during Project construction have the potential to cause substantial erosion or the loss of topsoil. However, in accordance with the Construction General Permit, discussed in Section 4.5.2.2, permit registration documents must be submitted to the SWRCB prior to the commencement of construction activities, which may include a Risk Assessment to determine the potential for the Project to affect water quality, a Particle Size Analysis to determine the site's overall erosion risk, a Stormwater Pollution Prevention Plan (SWPPP) for construction projects disturbing one acre or more to control pollutants from entering waterways, and Active Treatment System Design Documentation to demonstrate that stormwater treatment technology at the site can capture and treat runoff from a 10-year, 24-hour storm event with procedures for chemical control if determined necessary.

Prior to the issuance of a grading permit, the Project applicant is required to provide proof of filing of the permit registration documents with the SWRCB, including preparation of a SWPPP describing the BMPs to be implemented during Project construction. The SWPPP's construction BMPs shall include, but are not limited to:

- **Erosion Controls.** Erosion controls cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind; examples include mulch, geotextiles, mats, hydroseeding, earth dikes, and swales.
- **Sediment Controls.** Sediment controls filter out soil particles that have been detached and transported in water; examples include barriers such as straw bales, sandbags, fiber rolls, and gravel bag berms; desilting basins; and cleaning measures such as street sweeping.
- **Tracking Controls.** Tracking controls minimize the tracking of soil offsite by vehicles; examples include stabilized construction roadways and construction entrances/exits, and entrance/outlet tire washes.

The SWPPP must be implemented at the Project site and revised as necessary as administrative or physical conditions change. With the implementation of the SWPPP, impacts related to erosion and the loss of topsoil would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT. During the operations and maintenance phase, the Project site would be paved over with concrete or asphalt and developed with an industrial building. The Project would include landscaped areas, totaling approximately 17.2 percent of the Project site, as well as a drainage detention system for stormwater, preventing sedimentation. Limited ground-disturbing activities are anticipated during this phase, with only temporary potential for ground disturbance during any, as-needed utility maintenance. Therefore, impacts from Project operations and maintenance would be less than significant related to erosion or the loss of topsoil.

Impact GEO-3: Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off- site landslide, lateral spreading, subsidence, liquefaction, or collapse.**Construction**

LESS THAN SIGNIFICANT WITH MITIGATION. The proposed Project's impacts are discussed in the following sections.

Landslides

The Project site includes two separate areas in the northwestern portion of the site that are designated with a low possibility of landslides as shown on the US Landslide Inventory and Susceptibility map, which

is based on terrain features; in addition, the majority of the Project site is shown on the map as having a negligible risk of landslides (USGS, 2025). Furthermore, areas that are vulnerable to potential landslides have not been identified within the Project site, as discussed in the City of Torrance Local Hazard Mitigation Plan (City of Torrance, 2024). There are no known geologic discontinuities on this site, and there are no significant natural slopes (Leighton, 2023). Therefore, Project construction would result in no impacts related to landslides.

Liquefaction

Soils most susceptible to liquefaction are clean, loose, saturated, uniformly-graded, fine-grained sands. As shown on the March 25, 1999 Official Map of Seismic Hazard Zones for the Torrance Quadrangle, the Project site is not within a mapped potential liquefaction hazard zone (Leighton, 2019). As stated in Impact GEO-1, the Project site does not have conditions that would lead to liquefaction. Therefore, Project construction would result in no impacts related to liquefaction.

Lateral Spreading

Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying alluvial material (i.e., sediment deposited by running water, typically rivers or streams) toward an open or “free” face such as an open body of water, channel, or excavation. Generally in soils, this movement is due to failure along a weak plane, and may often be associated with liquefaction. Since the Project site does not have the conditions for liquefaction, and the site would furthermore be graded relatively flat, the Project site would not have conditions conducive for lateral spreading (Leighton, 2019). Therefore, Project construction would result in no impacts related to lateral spreading.

Subsidence

Subsidence is the sinking or settling of land, buildings, or structures to a lower level than the surrounding land. If near-surface soils vary in composition both vertically and laterally, strong earthquake shaking can cause non-uniform compaction of soil strata, resulting in movement of near-surface soils. Local strong ground shaking will cause differential dynamic compaction, where some parts of the ground compact more than others. This can lead to uneven settlement and potential damage to structures, which is possible on the Project site due to the undocumented fill in the borrow pit, consisting of clay, in contrast to the relatively dense native sands in the remaining portions of the Project site (Leighton, 2023). This impact could be potentially significant without mitigation. Mitigation Measure GEO-1 would require the removal of undocumented fill and compaction of onsite native sands to avoid any potential hazards related to compromising the structural integrity of the proposed industrial building. Therefore, impacts from Project construction related to subsidence would be less than significant with mitigation.

Collapse

As stated previously, with implementation of Mitigation Measure GEO-1, the removal of undocumented fill and compaction of onsite native sands during construction would avoid any potential hazards related to compromising the structural integrity of the proposed industrial building. Therefore, impacts related to collapse from unstable geologic units would be less than significant with mitigation.

Operations and Maintenance

LESS THAN SIGNIFICANT WITH MITIGATION. As stated previously, with implementation of Mitigation Measure GEO-1, the removal of undocumented fill and compaction of onsite native sands during construction would avoid any potential hazards related to compromising the structural integrity of the proposed industrial building. Therefore, impacts from Project operations and maintenance related to unstable geologic units would be less than significant with mitigation.

Impact GEO-4: Be located on expansive soil, creating substantial direct or indirect risks to life and property.

Construction

LESS THAN SIGNIFICANT WITH MITIGATION. Based on the Geotechnical Design Update completed for the Project site (Leighton, 2023), the borrow pit in the central portion of the Project site includes undocumented fill consisting of expansive clay extending below elevation 60 feet in the central area of the borrow pit. In addition, fill had also been placed in a separate area in the northwestern portion of the site. The Geotechnical Design Update recommends removing all undocumented fill from under the proposed industrial building footprint, which would extend down to elevation 50 feet above msl in the central portion of the borrow pit.

Site sands in the remaining portion of the Project site are non-expansive and have desirable consolidation characteristics (compared to clay) when properly compacted. However, the City of Torrance is known to have undesirable highly expansive clays not far from the Project site. Such clays are undesirable due to adverse expansion and consolidation characteristics, and will consolidate slower over time relative to sand. Therefore, the import of clays to the site must be avoided, unless the clays are placed within the pit at least 15 feet below finish grade. The Geotechnical Design Update recommends that site finish grades be lowered to provide more balanced earthwork requiring less import.

Because the Project site is located on expansive soil, the Project could create substantial direct or indirect risks to life and property if the soils are not removed and/or compacted during construction, and the expansion and contraction cycle of the soils results in compromising the structural integrity of the proposed industrial building. This impact would be potentially significant without mitigation. Mitigation Measure GEO-1 would require the removal of undocumented fill and compaction of onsite native sands to avoid any potential hazards. Therefore, impacts from Project construction related to expansive soils would be less than significant with mitigation.

Operations and Maintenance

LESS THAN SIGNIFICANT WITH MITIGATION. As stated previously, with implementation of Mitigation Measure GEO-1, the removal of undocumented fill and compaction of onsite native sands during construction would avoid any potential hazards related to compromising the structural integrity of the proposed industrial building. Therefore, impacts from Project operations and maintenance related to expansive soils would be less than significant with mitigation.

Impact GEO-5: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Construction

LESS THAN SIGNIFICANT WITH MITIGATION. Due to the disturbed nature of the site, the Project site does not include any unique geologic features. The Project site has been mapped at the eastern margin of “older, stabilized dune and drift sand – mostly unconsolidated fine-grained sand” (Qos). Qos (Older Sands, generally Pleistocene in age [2.6 million to 1,700 years ago]) fine-grained sand in Los Angeles County does have potential for paleontological resources (Michael Baker International, 2021). Fine-grained sand, especially in sedimentary formations like Qos, can preserve fossils of various organisms, including vertebrate and invertebrate remains. In addition, fossil localities have been recorded previously within the Qos unit (Michael Baker International, 2021).

A portion of the Project site has reportedly been an earth borrow source for berms and other earthwork on the adjacent Refinery, and ceramic catalyst-beads and other debris have been disposed of within an

approximately 7-acre area in the northwestern portion of this site (Leighton, 2023). During a 2019 field survey, horse stables were covering approximately 1 to 2 acres in the southeastern portion of the Project site, but as of 2024 have been moved across the street and the remaining structures on the Project site have been demolished through construction permits approved by the City of Torrance. Otherwise, the Project site had an undeveloped surface. Prior to construction, the site will undergo remediation under Cleanup and Abatement Orders from the LARWQCB, for releases at and from the former Refinery (CAO Numbers 88-43, 89-136, and 95-116). A Response Plan and Soil Management Plan have been prepared and are under review by the LARWQCB (SCS Engineers, 2025a and 2025b). The Response Plan and SMP are included as Appendix C.

According to the 1934 “Torrance” USGS Quadrangle, the northeast central portion of the site adjacent to the railroad was the lowest point on this parcel, roughly 75 feet above msl (Leighton, 2023). Since then, the borrow pit had been excavated down to roughly 60 feet above msl in the central portion of this site. Extrapolation and interpolation of prior reported subsurface conditions, in addition to conditions exposed in five current test pits, show undocumented fill extending underneath the central area of this borrow pit down to elevation 54 feet. Fill had also been placed in a separate area in the northwestern portion of the site.

The Geotechnical Design Update conducted for the Project site (Leighton, 2023) recommends over-excavating and recompacting all undocumented fill under the proposed industrial building footprint. Other areas of excavation for proposed utilities or parking areas would likely require less excavation; however, the potential exists for ground-disturbing activities to be completed in previously undisturbed soils, which could result in damaging unknown paleontological resources, thereby causing a potentially significant impact without mitigation. Mitigation Measure GEO-5 is required to ensure that any paleontological resources discovered during Project construction would be dealt with in a manner so as to protect any resource encountered during construction activities. Therefore, impacts from Project construction on paleontological resources would be less than significant with mitigation.

Operations and Maintenance

NO IMPACT. During the operations and maintenance phase, the Project site would be paved over with concrete or asphalt and developed with an industrial building. Limited ground-disturbing activities are anticipated during this phase, with only temporary potential for ground disturbance during any, as-needed utility maintenance, which would be conducted in previously disturbed soils. In addition, due to the disturbed nature of the site, the Project site does not include any unique geologic features. Therefore, Project operations and maintenance would result in no impacts related to paleontological resources or unique geologic features.

4.5.3.4. Mitigation Measures

Mitigation Measure for Impacts GEO-1, GEO-3, and GEO-4

GEO-1 **Implement Recommendations in Geotechnical Investigations.** The proposed Project shall be constructed in accordance with the geotechnical engineering recommendations as presented in the Geotechnical Design Update, Proposed Warehouse Facility, 3041± Del Amo Boulevard, Torrance, Los Angeles County, California (Leighton, 2023), as well as any subsequent documents, including responses to City comments. These recommendations address site preparation, excavation, fill placement and compaction, foundation design, and site drainage, among other topics, as summarized below (full recommendations are included in the Geotechnical Design Update, included as Appendix H of this EIR [Leighton, 2023]).

Project grading would comply with recommendations of the geotechnical investigation (Leighton, 2023) to remove all undocumented fill from under the proposed industrial building footprint, which would extend 50 feet above msl in the central portion of the existing borrow pit. The limits of existing fill removal will be verified by the Leighton representative during site grading activities. In addition, site sands shall be properly compacted, and the site finish grades shall be lowered to provide more balanced earthwork requiring less import. During grading operations, the Geotechnical Engineer (a representative of Leighton) shall be onsite to observe that soil and geologic conditions do not differ substantially from those expected. Mitigation shall follow recommendations set forth in the 2023 Geotechnical Design Update.

Mitigation Measure for Impact GEO-5

GEO-5 Monitor Ground-Disturbing Activities. The Project applicant shall retain a qualified paleontologist to monitor ground-disturbing activities in native sands on the Project site. The qualified paleontologist shall be present during the pre-grading meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils could be encountered. The paleontologist shall determine, based on consultation with the City, when monitoring of grading activities is needed based on the onsite soils and final grading plans.

All paleontological work to assess and/or recover a potential resource at the Project site shall be conducted under the direction of the qualified paleontologist and follow the standard protocols of the Natural History Museum of Los Angeles County. If any fossil remains are uncovered during earth-moving activities, all heavy equipment shall be diverted at least 50 feet from the fossil site until the monitor has had an opportunity to examine the remains and determines that earthmoving can resume. The extent of land area that is prohibited from disturbance shall be at the discretion of the paleontological monitor. Samples of native sands shall be collected as necessary for processing and shall be examined for fossils. The paleontologist shall prepare a report of the results of any findings following accepted professional practice and submit the report for review by the City of Torrance Planning Division.

4.5.4. Cumulative Impact Analysis

Geographic Extent/Context

The geographic extent of this cumulative analysis includes the Project site and adjacent properties.

Cumulative Impact Analysis

The proposed Project would not contribute to any cumulative impacts related to earthquake fault rupture, liquefaction, lateral spreading, or landslides, since the Project site is not susceptible to these hazards. However, the Project site is susceptible to seismic ground shaking (Impact GEO-1), subsidence and collapse (Impact GEO-3), and expansive soils (Impact GEO-4).

The adjacent properties surrounding the Project site are fully developed with commercial, industrial, and residential uses. Therefore, substantial new development in the immediate area is not anticipated. The proposed Project's contribution to cumulative impacts for Impacts GEO-1, GEO-3, and GEO-4 would be less than cumulatively considerable with Mitigation Measure GEO-1, which requires implementation of the recommendations in the Geotechnical Design Update prepared for the Project site (Leighton, 2023). Any developments on adjacent properties would likely be required to implement similar recommendations to minimize any hazards associated with the structural integrity of proposed structures.

Other developments in the immediate area may also have the potential to result in erosion and the loss of topsoil (Impact GEO-2). However, similar to the proposed Project, a SWPPP would be required, which would minimize any impacts; therefore, impacts would be less than cumulatively considerable.

Lastly, the Project has the potential to disturb unknown paleontological resources (Impact GEO-5), but with implementation of Mitigation Measure GEO-5, which requires monitoring ground-disturbing activities in native sands, the Project's incremental contribution to cumulative impacts would be less than cumulatively considerable. Other developments in the immediate area would also likely require similar measures.

4.5.5. Summary of Significance Findings

Table 4.5-1 provides a summary of each identified geology, soil, and paleontological resource impact and associated mitigation measures to reduce or avoid the impact (where warranted). Mitigation measures are required for each significant impact but are not required for impacts that are not significant.

Table 4.5-1. Summary of Geology, Soils, and Paleontological Resources Impacts and Mitigation Measures

Impacts	Mitigation Measures
Impact GEO-1: Directly or indirectly cause potential substantial adverse effects due to rupture of a known earthquake fault, seismic ground shaking, or liquefaction.	
Construction – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Operations & Maintenance – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Impact GEO-2: Result in substantial erosion or loss of topsoil.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact GEO-3: Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off- site landslide, lateral spreading, subsidence, liquefaction, or collapse.	
Construction – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Operations & Maintenance – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Impact GEO-4: Be located on expansive soil, creating substantial direct or indirect risks to life and property.	
Construction – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Operations & Maintenance – Less Than Significant with Mitigation	GEO-1: Implement Recommendations in Geotechnical Investigations
Impact GEO-5: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	
Construction – Less Than Significant with Mitigation	GEO-5: Monitor Ground-Disturbing Activities
Operations & Maintenance – No Impact	No mitigation measures are required.

4.6. Hazards and Hazardous Materials

This section provides an assessment of whether the Project would create risks to human health or the environment from the routine use, transport, storage, and disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. In addition, this section discusses whether the Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, as well as whether the Project is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Finally, this section evaluates whether the Project would impair or interfere with an adopted emergency response plan or emergency evacuation plan, or expose people or structures to a significant risk of loss, injury, or death from wildland fires.

The following discussion is based on the Phase I Environmental Site Assessment and Phase II Investigation Report prepared by SCS Engineers (2018a and 2018b) and the Preliminary Hydrology Study prepared by Kimley-Horn (2024) for the Project, and included in Appendices J, K, and Q, unless otherwise referenced. The proposed Project's potential effects on hazards and hazardous materials were evaluated using the criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are discussed in more detail in Section 4.6.3.3, Environmental Impact Analysis. The analysis concludes that the proposed Project impacts associated with hazards and hazardous materials would be less than significant.

No scoping comments were received regarding hazards and hazardous materials during the public scoping period for the proposed Project.

4.6.1. Environmental Setting

Project Site Conditions

Physical Setting

This discussion of the physical setting provides a general description of the site topography and groundwater characteristics for the Project site and surrounding area.

Site Topography. The natural topography at the Project site has been substantially affected by previous activities associated with the adjacent Torrance Oil Refinery (Refinery). A portion of the Project site was historically used as a disposal site for wastes from the adjacent Refinery. The reportedly 9.2-acre disposal area in the northwestern portion of the Project site contains Refinery wastes that include: "catalyst-like" materials (ceramic pellets), catalyst/oil mixture, coke fines, contaminated soil, tank sludges, oil, alky bauxite, vacuum truck loads, oil "treater" sand filters, and general Refinery debris up to 20+ feet in thickness (SCS Engineers, 2018a; Appendix J, and SCS Engineers, 2018b; Appendix K). Additional details about the contaminants at the Project site are provided below under "Summary of Recognized Environmental Conditions" and "Site Investigation."

The Project site is situated on the eastern margins of the El Segundo Sand Hills, in the southern portion of the Torrance Plain, within the Coastal Plain of Los Angeles County. The site elevation varies from a high of about 106 feet above mean sea level (msl) along Del Amo Boulevard to a low of about 61 above msl within an excavated "borrow pit" in the central portion of the Project site (where soil was historically borrowed for constructing berms at the Refinery). With exception of the pit, the site topography generally slopes to the northeast. The Santa Monica Bay is located approximately 3 miles west of the Project site.

Groundwater Characteristics. Groundwater characteristics include general information about aquifers³⁴ that are located beneath the Project site and surrounding area, as well as site-specific groundwater depth information.

The two shallowest hydrogeological units³⁵ beneath the Project site include a perched aquifer, which first occurs at approximately 30 to 32 feet above msl, and the Gage-Gardena Aquifer, which first occurs at approximately 1 to 4 feet below msl. The confining layer creating the perched aquifer is described as occurring approximately 70 feet below ground surface (bgs).³⁶ Groundwater in the perched aquifer flows generally southwesterly, has been affected by fuel releases from the adjacent aboveground tank farm on the Refinery across the railroad tracks along the northeastern Project site boundary, and contains up to almost 2 feet of light non-aqueous phase liquid (LNAPL) (SCS Engineers, 2018a; Appendix J). The Gage-Gardena Aquifer flows generally easterly in direction (the opposite direction from the overlying perched aquifer), has also been affected by fuel releases, and contains 6+ feet of LNAPL. There are 18 existing groundwater wells: 14 wells in the perched aquifer scattered throughout the Project site, and 4 wells in the Gage-Gardena Aquifer along Del Amo Boulevard.

During a geotechnical investigation of the Project site, free water was not encountered (Kimley-Horn, 2024; Appendix Q). The lack of free water and the moisture level of the samples led the investigators to estimate that the groundwater at the site is more than 30 feet below the ground surface. Further, historically the groundwater levels typically read between 48 feet and 77 feet below ground surface from 2005-2017 (<http://geotracker.waterboards.ca.gov>).

Site Inspection

This section focuses on the results of a site inspection that was conducted in May 2018 during completion of the Phase I Environmental Site Assessment by SCS Engineers (2018a; Appendix J).

Based on the site inspection, the existing Project site is currently vacant and primarily undeveloped. The site inspection identified equestrian facilities associated with the Torrance Mounted Posse in the southeastern portion of the Project site. The Torrance Mounted Posse was formerly a branch of the police department but was civilianized in the 1970s (Cyberrider, n.d.). Most recently, the Torrance Mounted Posse served as a community organization offering horseback riding services and activities on the Project site. As of 2024, the equestrian facilities have been relocated to an adjacent parcel to the south of the Project site, as a condition of the sale of the Project parcel.

Other than oil pipelines observed on and adjacent to the Project site, no oil production/processing activities are being conducted on the site. An area of lower elevation, identified as the borrow pit, is located in the central portion of the Project site. Small soil stockpiles were observed in the borrow pit, indicating that soil (from unknown sources) was placed there in the past. Debris, including bricks, concrete, piping (potentially asbestos containing), catalyst beads, petroleum coke, etc., is scattered across the surface on the northwestern portion of the Project site in the 9.2-acre disposal area.

Numerous groundwater monitoring wells associated with the Refinery are present on the Project site, primarily around the perimeter. In addition, evidence of recent borings and soil gas probes were observed on the Project site from previous investigations.

³⁴ An aquifer is an underground layer of saturated rock, sediment, or soil that can hold and transmit groundwater. Water enters aquifers through natural processes like rain or snowmelt seeping into the ground and moves through the porous spaces within the rock or soil.

³⁵ A hydrogeologic unit is a distinct layer or zone of soil or rock that influences the storage and movement of groundwater due to its unique porosity and permeability. These units are fundamental to managing water resources and are classified into a hierarchy, from large hydrogeological regions down to individual aquifers.

³⁶ A perched aquifer is a body of groundwater that sits above the main water table, separated from it by an unsaturated zone or a layer of impermeable material, also referred to as a confining layer.

Site History

The Project site history information, which included a review of historical aerial photographs, identified an area on the northwest portion of the site used by the Refinery for the placement or disposal of Refinery wastes between at least 1947 until sometime between 1963 and 1970. By 1970, excavation/grading activities appear to have been present in the area known as the borrow pit. The eastern portion of the Project site appeared to have been used for agricultural purposes between at least 1952 through 1970. The Torrance Mounted Posse had used the southern portion of the Project site for horse stables from at least 1989, to 2024.

Site Records Search

This section focuses on the results of a site records search conducted in May 2018 during completion of the Phase I Environmental Site Assessment by SCS Engineers (2018a; Appendix J). The site records search identified several previous investigations that have been conducted at the Project site and the adjacent Refinery. These previous investigations provide information about site contaminants, and cleanup and monitoring efforts, as discussed below.

As a result of these previous site investigations, which are discussed in more detail below, the Refinery is currently the subject of Cleanup and Abatement Orders (CAOs) from the Los Angeles Regional Water Quality Control Board (LARWQCB) for releases at and from the Refinery (CAO Numbers 88-43, 89-136, and 95-116), and the Project site is also within the area subject to those orders. Prior to any construction activities associated with the proposed Project, remediation work will be performed with the oversight of the LARWQCB. A Response Plan and Soil Management Plan (SMP) have been prepared and are under review by the LARWQCB (SCS Engineers, 2025a and 2025b). The SMP and Response Plan are included as Appendix C.

Site Contaminants. Numerous previous investigations have confirmed that the disposal area on the Project site contains total petroleum hydrocarbon (TPH), semi-volatile organic compounds (SVOCs), petroleum-related volatile organic compounds (VOCs), and metals at concentrations above typical regulatory cleanup levels. The disposal area occupies most of the northwestern portion of the Project site within an approximately 9.2-acre area. Fifteen years ago, a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) report for the Refinery, prepared by a contractor working for the US Environmental Protection Agency (EPA), referred to the disposal area as “Solid Waste Management Unit 9” (SMWU 9).³⁷ However, the EPA databases for RCRA sites – “RCRAInfo” – contains information about the Refinery, but shows all treatment, storage or disposal units there to have a “Legal/Operating Status” as “Delisted – Protective Filer,” with an effective date of January 26, 2007.³⁸

In addition to the disposal area, the perched and underlying Gage-Gardena Aquifers have been affected by fuel-related constituents and free hydrocarbon product,³⁹ up to several feet in thickness. Consultants for Torrance Refinery Company LLC (TRC), the current operator of the Refinery, have indicated that the source of the perched aquifer contamination is the upgradient aboveground tank farm at the Refinery adjacent to the northeast of the Project site, and the downgradient (southwesterly) extent of impacts on the perched aquifer have not been defined. However, the source of the groundwater contamination may be to the west of the Project site in the underlying Gage-Gardena Aquifer, which flows easterly (in the opposite direction from the perched aquifer).

³⁷ A SWMU is an EPA regulatory term for any area at a facility where solid waste has been managed, handled, or placed.

³⁸ In the EPA’s RCRAInfo system, “Delisted – Protective Filer” signifies a facility that generates waste that has been officially “delisted” from the federal list of hazardous wastes through a delisting petition process. This designation allows the facility to handle the waste as non-hazardous under RCRA regulations, though they may still need state approval, and they must confirm the waste’s non-hazardous characteristics. More information about RCRA regulations is provided in Section 4.6.2.1.

³⁹ A free hydrocarbon product is a petroleum contamination, like oil or gasoline, that exists as a distinct, separate material that does not mix or dissolve with water. Because petroleum is generally lighter than water, it floats on top of the groundwater, forming a layer of free product that can be mobile.

A previous soil vapor investigation has also identified elevated methane and VOC concentrations, likely from existing soil and/or groundwater contamination.

Site Cleanup and Monitoring Efforts. Other than anecdotal reports of a historical free hydrocarbon product (FHP) recovery system in a 1993 report prepared by Environmental Engineering Group (EEG) and documentation of waste removal in 1979, none of the available information indicates any remediation of soil or groundwater at the Project site. In 1979, in response to the identification of piles of “colored” waste materials with “hazardous levels” of copper and zinc, the California Department of Toxic Substances Control (DTSC) requested that Mobil Oil Corporation (Mobil, a previous Refinery operator) provide written documentation of the clean-up and disposal of the hazardous wastes and a program of sampling to document effective clean-up. Mobil provided a response letter (dated May 30, 1979) indicating 3,776.4 tons of waste was removed from the Project site, including 255 loads disposed of at the Palos Verdes Landfill and 99 loads disposed of at the BKK Landfill.

In May 2017, the LARWQCB approved a Workplan by AECOM to further characterize the nature and extent of LNAPL in both the perched and underlying aquifer (the Gage-Gardena). The proposed scope includes 24 initial borings, additional confirmation borings based on the initial boring results, groundwater sampling at five locations, installation of nine groundwater wells, and additional LANPL tests and analysis. Portions of the Workplan have been implemented and some are also on-going. Although LNAPL removal was reportedly historically conducted at the Project site, no groundwater remediation activities are currently in progress or proposed at this time as part of this specific effort.

Summary of Recognized Environmental Conditions

A Recognized Environmental Condition (REC) is defined by the ASTM 1527 standard as the presence or likely presence of any hazardous substances or petroleum products on a property that indicates a current or past release, or a material threat of a release, into the environment.⁴⁰

Based on the site inspection and review of the Project site’s history and records search results, the following RECs were identified on the Project site (SCS Engineers, 2018a; Appendix J):

- Refinery waste disposal on the northwestern portion of the Project site;
- Regional groundwater contamination associated with the adjacent Refinery;
- Methane and VOCs in soil vapor above regulatory screening levels;
- SVOC, metal, and petroleum-affected soil;
- Historical agricultural land use;
- Undocumented fill soils within and near the borrow pit;
- Deed restrictions based on contamination; and
- Numerous oil and hydrocarbon product lines adjacent and across the Project site.

Site Investigation

The site investigation, discussed in the Phase II Investigation Report, involved collecting samples at the Project site to further characterize the RECs described above (SCS Engineers, 2018b; Appendix K).

Based on the site records search, known releases from the Refinery have affected the soil, soil vapor, and groundwater beneath the Project site. To further assess the site, soil, asbestos, and catalyst samples were collected and analyzed for the Project site (SCS Engineers, 2018b; Appendix K). Based on previous and current investigations at the Project site, friable asbestos-containing materials (ACM) are present within the Refinery disposal area on the Project site. Soil at the Project site also contains asbestos at concentrations up to 5 percent (%). The soil samples with the highest asbestos concentrations are located

⁴⁰ ASTM International, formerly known as American Society for Testing and Materials, is a standards organization that develops and publishes voluntary consensus technical international standards for a wide range of materials, products, systems and services.

in the Refinery disposal area, with lower concentrations in the areas immediately surrounding the disposal area.

Previous and current site investigations have identified metals, including arsenic (up to 54 milligrams per kilogram [mg/kg]), total lead (up to 14,000 mg/kg), chromium (up to 2,400 mg/kg), copper (up to 1,400 mg/kg), and mercury (up to 53 mg/kg) in one or more samples on the Project site. The soluble analyses for lead show up to 1,000 milligrams per liter (mg/l) Soluble Threshold Limit Concentration (STLC) lead and up to 21 mg/l Toxicity Characteristic Leaching Procedure (TCLP) lead.⁴¹ In addition, a previous investigation by Stantec identified methane (up to 23%) and fuel-related VOCs in soil vapor on the Project site.

Primary contaminants at the Project site include fuel-related hydrocarbons, VOCs, and SVOCs. TPH and VOCs are present above screening levels in the Refinery disposal area, and therefore, would be considered a potential threat to groundwater by the LARWQCB.

Surrounding Property Conditions

Surrounding land uses include commercial and industrial uses to the south and residential use to the west and southwest of the Project site. Adjoining property uses are as follows:

- North/east – Railroad tracks, followed by the Refinery.
- South – Refinery land, a portion of which is used seasonally as a Christmas tree lot.
- Southwest – Intersection of Del Amo Boulevard with Prairie Avenue, followed by the Mediterranean Villas community.
- West – Prairie Avenue, followed by Staybridge Suites (19901 Prairie Avenue) and an office building (3401 Del Amo Boulevard).
- West/Northwest – SOC Storage Center (19840 Pioneer Avenue).

During the site inspection, numerous large aboveground storage tanks on the Refinery were visible from the Project site. In addition, pipeline markers indicated subsurface oil pipelines running immediately adjacent to the north/northeast and western Project site boundaries.

In the areas surrounding the Project site, aerial photographs revealed that railroad tracks were present to the northeast, and oil exploration activities (wells and sumps) were visible in the surrounding area as early as 1928. Of particular note, a sump was present from at least 1928 through 1947, immediately adjacent to the southwestern site boundary. Evidence of the Refinery was present adjacent to the northeast of the Project site across the railroad tracks as early as 1928, and the Refinery appeared to expand through the years until it appeared similar to current conditions by 1947.

Surrounding Property Records Search

Regulatory database information identified several known and suspected contaminated sites in the area surrounding the Project site. However, based on distance and direction from the Project site, case status, and/or groundwater flow direction, the majority of these sites (with the exception of the Refinery) are unlikely to affect the Project site directly.

Hazardous Waste and Substances Sites

The Project is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (see Section 4.6.2.2). The Project site, referred to as the “North Posse Site,” is a Cleanup Program Site with an open case (<http://geotracker.waterboards.ca.gov>). A Cleanup Program Site, under the State Water Resources Control Board’s (SWRCB) Site Cleanup Program, is a location where contaminated soil, groundwater, or other environmental media need to be remediated to protect human health and the environment. These sites often result from past industrial activities, spills,

⁴¹ STLC and TCLP are both methods used to determine if a waste is hazardous, but they differ in their application and the regulations they apply to.

or other unauthorized releases of hazardous materials. As part of the Site Cleanup Program, subsequent remediation work will be performed with oversight from the LARWQCB, as discussed under Section 4.6.3.3. The contaminants at the Project site that are being addressed under this program are discussed above under “Site Investigation.”

Evacuation Routes

The City of Torrance Local Hazard Mitigation Plan (City of Torrance, 2024) identifies Hawthorne Boulevard, located approximately 0.4 mile to the west of the Project site, as the closest disaster evacuation route. Interstate 405, located approximately 1.17 miles to the north of the Project site, is the nearest freeway evacuation route.

Wildfire Risks

The California Department of Forestry and Fire Protection’s (CALFIRE) map of Fire Hazard Severity Zones (FHSZ) shows that the Project site is not located within an FHSZ (CALFIRE, 2025). The area surrounding the Project site is fully developed with commercial, industrial, and residential uses, and no wildlands are located within proximity to the Project site. While the City of Torrance’s southern border is adjacent to the Palos Verdes Estates/Rancho Palos Verdes/Rolling Hills area, a wildland area designated as a Very High FHSZ within a Local Responsibility Area, this wildland area is located approximately 3.6 miles south of the Project site. However, the Project site is currently an undeveloped parcel that consists of an open area of vegetation, including brush that could serve as fuel for a fire.

4.6.2. Applicable Regulations, Policies, and Standards

4.6.2.1. Federal

Resource Conservation and Recovery Act

At the federal level, the principal agency regulating the generation, transport, and disposal of hazardous substances is EPA, under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976. The RCRA established an all-encompassing federal regulatory program for hazardous substances that is administered by EPA. Under the RCRA, EPA regulates the generation, transportation, treatment, storage, and disposal of hazardous substances. The RCRA was amended by the Hazardous and Solid Waste Amendments (HSWA) of 1987, which specifically prohibit the use of certain techniques to dispose of various hazardous substances. EPA has delegated much of the RCRA requirements to the DTSC.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as the “Superfund Act,” provides a federal fund to identify, characterize, and remediate hazardous material sites. Through the Superfund Act, EPA was granted the authority to identify and obtain the cooperation of parties responsible for hazardous material incidents and conditions.

Superfund Amendments and Reauthorization Act

The Superfund Amendments and Reauthorization Act (SARA), Title III of 1986, is the Emergency Planning and Community Right to Know Act (EPCRA). Facilities are required to report the following items on EPA Form R, the Toxic Chemical Release Inventory Reporting Form: facility identification, off-site locations where toxic chemicals are transferred in wastes, chemical-specific information, and supplemental information.

Emergency Planning and Community Right to Know Act

EPCRA (40 Code of Federal Regulations [CFR] Parts 350 to 372) of 1986 develops a framework for emergency planning and community awareness regarding chemical emergencies. The EPCRA mandates industrial facilities to report on the storage, use, and release of hazardous chemicals to relevant authorities, including federal, state, tribal, territorial, and local governments. This legislation requires emergency response planning, including facility and community participation in the emergency planning process, collection of hazardous chemical information from facilities, and collective planning involving key stakeholders in the community. The EPCRA also mandates “Community Right to Know” reporting on hazardous and toxic chemicals, which ensures adequate public access to information on chemicals, their use, and release into the environment. Regulation of and reporting on toxic chemicals under EPCRA support emergency planning for chemical accidents, mitigating potential risks to communities.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) established the mechanisms by which EPA tracks, screens, and tests industrial chemicals currently produced or imported into the United States (US) that may pose an environmental or human health hazard. The TSCA addresses the production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint (LBP).

Hazardous and Solid Waste Amendments Act

The Hazardous and Solid Waste Amendments Act (HSWA) of 1984 amends the RCRA by prioritizing waste minimization and phasing out land disposal of hazardous waste. HSWA introduces corrective action for waste release and strengthens regulatory oversight by granting increased enforcement authority to EPA. Furthermore, HSWA establishes more rigorous hazardous waste management standards and implements a comprehensive underground storage tank program.

Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act (HMTA) (49 USC Sections 1801–1819 and 49 CFR Parts 101, 106, 107, and 171–180) was enacted in 1975 to regulate transport of hazardous materials by motor vehicles, marine vessels, and aircraft. HMTA establishes policies, procedures, and guidelines for safe transport, including material designation, labeling, packaging, and operational rules. HMTA authorizes the Secretary of Transportation to identify commodities posing unreasonable public risks, designating them as hazardous materials based on quantity or form. This legislation significantly expands the US Department of Transportation (USDOT)'s role in ensuring the secure transportation of hazardous materials, safeguarding public well-being and environmental protection.

Clean Water Act

The Clean Water Act (CWA) was enacted in 1948 and amended in 1972, acting as the primary federal law governing pollution control and water quality in the US. The CWA regulates discharges and spills of pollutants, including hazardous materials, aiming to restore and maintain the integrity of waterways. The CWA also regulates quality standards for surface waters and groundwater. The CWA has allowed EPA to implement pollution control programs and national water quality criteria recommendations for pollutants in surface waters. This legislation made it unlawful to discharge any pollutant from a point source into navigable waters, unless a National Pollutant Discharge Elimination System permit is obtained.

Safe Drinking Water Act

The Safe Drinking Water Act (42 United States Code [USC] Section 300[f] et seq.) was enacted in 1974 and amended in 1986 and 1996 to safeguard the public drinking water supply and its sources, (i.e., rivers,

lakes, reservoirs, springs, and groundwater wells). EPA has established stringent drinking water standards for over 90 contaminants, encompassing both naturally occurring and human-made substances. This act enables EPA to set minimum tap water standards, mandating compliance among all public water systems. This legislation also authorizes EPA to set standards for state programs protecting underground drinking water sources from underground fluid injection hazards.

Federal Hazardous Substances Act

The Federal Hazardous Substances Act (FHSA), enacted in 1960, mandates the labeling of hazardous substances with precautionary warnings to ensure consumers can safely store and use such products. The legislation also provides information on immediate first-aid measures in the event of an accident. In addition, the FHSA defines and categorizes hazardous substances. The FHSA grants the Consumer Product Safety Commission the authority to ban certain hazardous products that pose a risk to consumer safety.

Pipeline and Hazardous Materials Safety Administration

The USDOT Pipeline and Hazardous Materials Safety Administration (PHMSA) regulates oil pipeline design, construction, testing, operation, and maintenance under Title 49 CFR Part 195 entitled, "Transportation of Hazardous Liquids by Pipeline," authorized by the Pipeline Safety Act of 2011.

Pipeline facilities are subject to regular inspection and maintenance activities required by the USDOT's PHMSA regulations which include, but are not restricted to, regular inspections of the terminal and pipeline route for visible leaks and to evaluate aboveground equipment including valve stations, pump and power stations; monthly inspections to ensure the integrity of pipeline corrosion protection; excavation and repair of pipeline segments experiencing degradation; and repair of pipeline anomalies identified during internal inspection or at locations damaged by third parties.

Title 49 CFR Parts 100 through 185 also address hazardous materials transport, including the types of packages and packaging required for safe transport, as well as performance standards and testing requirements; required documentation for shipping hazardous materials, including shipping papers and labels; the markings and labels required on packaging and the placards required by carriers; training requirements for those involved in transporting hazardous materials and requirements for safety plans; emergency response procedures and information; and regulations specific to various modes of transportation, including air, highway, ocean, and rail.

Federal Occupational Safety and Health Act

The Occupational Safety and Health Administration (OSHA) administers the Federal Occupational Safety and Health Act, which requires training handlers of hazardous materials, notifying employees who work in the vicinity of hazardous materials, acquiring material safety data sheets that describe the proper use of hazardous materials, and training employees to remediate any hazardous material accidental releases.

The Federal Occupational Safety and Health Act regulates lead and asbestos as they relate to employee safety through a set of notification and corrective action requirements; warning signs and labels; controlled access; and use of protective equipment, demolition/renovation procedures, housekeeping controls, training, and, in certain cases, air monitoring and medical surveillance to reduce potential exposure. This legislation also requires contractors conducting LBP and ACM surveys and removal to be certified by the California Occupational Safety and Health Administration (Cal/OSHA).

Occupational Safety and Health Administration Standards, Materials Handling and Storage

OSHA Standards, Materials Handling and Storage regulation (Title 29 CFR Section 1910.176) covers general safety requirements for hazardous material storage areas. This policy mandates safety practices for the

use of mechanical equipment, housekeeping procedures, and secure storage practices to ensure that materials do not pose a hazard while stored.

Federal Compliance with Pollution Control

Executive Order 12088 requires federal agencies to take necessary actions to prevent, control, and abate environmental pollution from federal facilities and activities under control by federal agencies. Agencies must comply with applicable pollution control standards, including those standards related to toxic substances, water pollution, air quality, and noise control. The EPA Administrator provides technical advice and oversight, while agencies must submit annual plans and ensure sufficient funding for compliance. Executive Order 12088 also establishes procedures for resolving conflicts and granting exemptions from pollution control standards.

4.6.2.2. State

California Hazardous Waste Control Act

The California Hazardous Waste Control Act is implemented by regulations contained in Title 26 of the California Code of Regulations (CCR) that describe requirements for the proper management of hazardous wastes. This legislation created the state hazardous waste management program, which is similar to, but more stringent than the federal RCRA program.

The program includes hazardous waste criteria for:

- Identification and classification
- Generation and transportation
- Design and permitting of recycling, treatment, storage, and disposal facilities
- Treatment standards
- Operation of facilities and staff training
- Closure of facilities and liability requirements

The California Hazardous Waste Control Act and Title 26 regulations list more than 800 potentially hazardous materials and establish criteria for identifying, packaging, and disposal. Under these regulations, the generators of hazardous waste must complete a manifest that accompanies the material from the point of generation to transportation to the ultimate disposal location, with copies of the manifest filed with the DTSC.

California Integrated Waste Management Act

The California Integrated Waste Management Act (IWMA), specifically Assembly Bill 939, mandates local jurisdictions to divert a significant portion of their waste stream. The act requires each jurisdiction to develop and implement plans that include a Household Hazardous Waste Element (HHWE), identifying programs for the safe collection, recycling, treatment, and disposal of household hazardous waste. The California Department of Resources Recycling and Recovery (CalRecycle) oversees and assists local jurisdictions in developing and implementing these plans to meet the IWMA mandates. CalRecycle also maintains the Disposal Reporting System to track the origin of waste, including hazardous waste, disposed of in California's landfills and those sent out of state.

California Hazardous Substances Act

The California Hazardous Substances Act prohibits the manufacture, production, preparation, compounding, packaging, sale, offer for sale, or storage for sale of packages containing misbranded or banned hazardous substances. This policy defines electrical, mechanical, and thermal hazards, and requires proper labeling and adequate directions for such hazards that are available to the public. If any hazards pose a public threat, they can be deemed a "banned hazardous substance."

Unified Program

The California Environmental Protection Agency oversees the Unified Program, which aims to protect Californians from hazardous waste and materials by ensuring consistent application of statewide standards across local regulatory agencies. The Unified Program consolidates various environmental and emergency management programs, streamlining permitting, inspections, and enforcement activities. The California Certified Unified Program Agency (CUPA) Forum, formed by CUPAs and Program Agencies, collaborates with local, state, and federal representatives to address policy, training, and problem-solving through the Unified Program Administration and Advisory Group.

Key state agencies, including the DTSC, California State Fire-Office of the State Fire Marshal, and SWRCB, are involved in implementing the program, providing technical assistance, and ensuring consistency in program elements. The Secretary of the California Environmental Protection Agency coordinates the program and certifies Unified Program Agencies, which have taken over responsibilities from approximately 1,300 previous agencies.

California Accidental Release Prevention Program

The California Accidental Release Prevention Program (CalARP) (CCR, Title 19, Division 2, Chapter 4.5) covers certain businesses that store or handle more than a certain volume of specific regulated substances at their facilities. The CalARP regulations became effective on January 1, 1997, and include the provisions of the Federal Accidental Release Prevention Program (Title 40, CFR Part 68) with certain additions specific to the state pursuant to California Health and Safety Code Article 2, Chapter 6.95.

The list of regulated substances is in Article 8, Section 2770.5 of the CalARP regulations. Businesses that use a regulated substance above the noted threshold quantity must implement an accidental release prevention program, and some may be required to complete a Risk Management Plan (RMP). An RMP is a detailed engineering analysis of the potential accident factors present at a business and the mitigation measures that can be implemented to reduce this accident potential. The purpose of an RMP is to decrease the risk of an off-site release of a regulated substance that might harm the surrounding environment and community. An RMP includes the following components: safety information, hazard review, operating procedures, training, maintenance, compliance audits, and incident investigation. The RMP must consider the proximity to sensitive populations in schools, residential areas, general acute care hospitals, long-term health care facilities, and child day-care facilities, and must also consider external events such as seismic activity.

California Occupational Safety and Health Act

Cal/OSHA regulates worker safety similar to federal OSHA but also requires preparation of an Injury and Illness Prevention Program, an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication. In addition, Cal/OSHA regulations indirectly protect the general public by requiring construction managers to post warning signs, limit public access to construction areas, and obtain permits for work considered to present a significant risk of injury, such as excavations greater than 5 feet.

Hazardous Materials Release Response Plans and Inventory Act

The Hazardous Materials Release Response Plans and Inventory Act (California Health and Safety Code Section 25500 et seq.), also known as the Business Plan Act, defines hazardous materials as raw or unused materials that are part of a process or manufacturing step. Although hazardous materials are not strictly defined as hazardous wastes, the health concerns involved are similar. In order to avoid public and environmental health risk, facility descriptions, materials inventories, and emergency response plans are generally required for operations involving hazardous materials and wastes.

Hazardous Materials Transport

The California Highway Patrol (CHP), California Department of Transportation (Caltrans), and DTSC have the responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. Regulations governing hazardous materials transport are included in the California Vehicle Code (CCR, Title 13); State Fire Marshal Regulations (CCR, Title 19); and CCR, Title 22, Division 4.5, Chapter 13.

California Vehicle Code

CCR, Title 13 establishes regulations for motor carrier transport of hazardous materials. All motor carrier transporters of hazardous materials are required to have a Hazardous Materials Transportation license issued by the CHP. In addition, placards identifying that hazardous materials are being transported must be displayed on the vehicle. California Vehicle Code Section 31303 requires that hazardous materials be transported via routes with the least overall travel time and prohibits the transportation of hazardous materials through residential neighborhoods. CHP is authorized to designate and enforce route restrictions for the transportation of hazardous materials.

California Code of Regulations Title 22

Transport of hazardous materials can be conducted only under a registration issued by DTSC as outlined by Chapter 13, Division 4.5 of CCR, Title 22. Identification numbers are issued by DTSC or EPA for tracking hazardous waste transporters and treatment, storage, and disposal facilities for hazardous materials. The identification number is used to identify the hazardous waste handler and to track waste from the point of origin to final disposal. Transporters of hazardous wastes must register as a hazardous waste hauler with DTSC. Each truck, trailer, semitrailer, or container used for shipping hazardous waste must be designed and constructed, and its contents must be limited, so that under conditions normally incident to transportation, there would be no release of hazardous waste to the environment. All material transport must take place under manifest, and compliance with CCR, Title 22 requires that transporters take immediate action to protect human health and the environment in the event of a spill, release, or mishap.

Hazardous Waste and Substances Sites List

The Hazardous Waste and Substances Sites List (Cortese List) is a planning document that provides information about the location of hazardous materials release sites. California Government Code Section 65962.5 requires the DTSC to compile and update the Cortese List at least annually. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

La Follette Bill (Risk Management Plan)

Administered by the CUPA, the La Follette Bill requires preparation of a RMP for commercial operations which use hazardous materials at defined thresholds. The RMP includes management, engineering, and safety studies, and plans for physical improvements to minimize accidental hazardous materials releases. The RMP is implemented via fire inspections, plan checking, Business Emergency Plan/Hazardous Materials Business Plan (HMBP) disclosure requirements, and filing of the RMP (updated every 3 years).

Hazardous Materials Screening Levels

Screening levels related to protection of human health in the case of routine, long-term exposure by direct pathways (i.e., ingestion, inhalation and dermal contact) commonly include EPA Regional Screening Levels (RSLs) and DTSC Screening Levels (DTSC-SLs). RSLs and DTSC-SLs include inorganic constituent concentrations that are based on the protection of public health. In California, DTSC-SLs are commonly used in

lieu of RSLs when DTSC uses toxicity criteria that are different than the toxicity criteria used by EPA. RSLs and DTSC-SLs can be used for:

- Prioritizing multiple sites or operable units or areas of concern within a facility or exposure units
- Setting risk-based detection limits for contaminants of potential concern (COPCs)
- Focusing future site investigation and risk assessment efforts (e.g., selecting COPCs for the baseline risk assessment)
- Identifying contamination which may warrant cleanup
- Identifying sites, or portions of sites, which warrant no further action or investigation
- Creating initial cleanup goals when site-specific data are lacking

RSLs and DTSC-SLs are considered conservative. Under most circumstances, the presence of a chemical in site media at concentrations less than the corresponding RSL and DTSC-SL can be assumed not to pose a significant, long-term (chronic) threat to human health or the environment. Inorganic constituent concentrations may also be compared to local background levels.

Hazardous Materials Storage

The California Department of Industrial Relations, CCR, Title 8, Section 5164 Storage of Hazardous Substances, states that hazardous substances that may react violently, release toxic vapors or gases, or become hazardous due to properties such as toxicity, flammability, or explosibility must be evaluated for compatibility before storage. Incompatible substances should be separated by distance or physical barriers to prevent accidental contact. Further, hazardous substances should be stored in containers approved by the USDOT, which are chemically suitable for the specific substance. Containers must be stored in a way that prevents physical damage or deterioration, avoiding exposure to conditions that could lead to rupture or leakage. Additionally, containers of substances that release toxic or hazardous gases, vapors, or fumes should not be stored in areas where employee exposure is likely, except in small quantities or in secure transport containers.

State of California Emergency Plan

The State of California Emergency Plan, produced by the California Governor's Office of Emergency Services (Cal OES), provides guidance on natural and human-made emergencies and disasters. The plan identifies hazards and vulnerabilities, including hazardous materials emergencies, with guidance on emergency management organizations, mitigation programs, emergency preparedness, recovery concept of operations, continuity planning, California emergency support functions, state roles and responsibilities, and plan administration.

Cal OES has released a 2023 California State Emergency Plan Coordinating Draft, which updates the aforementioned plan components, with specific mention of hazardous materials emergency. The Draft plan discusses hazard-specific planning, hazardous materials/oil spill release notifications, and information on state agency support functions pertaining to hazardous materials.

Hazardous Waste Management Plan

The DTSC developed the 2023 Hazardous Waste Management Report, which will inform the first Hazardous Waste Management Plan being prepared in 2025. The Hazardous Waste Management Report supports the draft Hazardous Waste Management Plan by establishing a baseline understanding of hazardous waste management in California, identifying data and research gaps, and beginning the planning to address these gaps. The Hazardous Waste Management Plan, which is scheduled to be approved in July 2025, will act as a guiding document for hazardous waste management in California, guide state and local

hazardous waste management efforts, and support the DTSC's implementation of its waste management program. The plan will focus on hazardous waste criteria, waste reduction, and capacity planning.

Hazardous Waste Facility Siting

CCR, Title 22, Division 4.5, Chapters 14 and 15 provide guidance on the treatment, storage, and disposal of hazardous waste. Chapter 14 codifies standards for owners and operators of hazardous waste transfer, treatment, storage, and disposal facilities. Chapter 15 provides interim status standards for owners and operators of hazardous waste transfer, treatment, storage, and disposal facilities. Both chapters regulate general facilities, through means such as required notices, security, location standards, and general inspection requirements. Other standards included in both chapters refer to preparedness and prevention, contingency planning and emergency procedures, financial requirements, and guidance by facility type (e.g., landfills, incinerators, and tank systems).

Tanner Act

The Tanner Act (Assembly Bill 2948) was adopted in 1986 and is a comprehensive hazardous waste materials law. The Tanner Act governs the preparation of hazardous waste management plans and storage of hazardous waste in facilities. The Tanner Act also mandates that each county adopt a Hazardous Waste Management Plan. To be in compliance with the Tanner Act, local or regional hazardous waste management plans need to include provisions that define the planning process for waste management, the permit process for new and expanded facilities, and the appeal process to the state available for certain local decisions.

Asbestos Abatement

Asbestos abatement efforts must be completed in compliance with CCR, Title 8, Section 5208; CCR, Title 8, Section 1529; and CCR, Title 8, Section 341.6 through 341.14. The regulations in CCR, Title 8, Section 5208 implement worker exposure limits, require exposure monitoring, implement compliance programs, require employee protection and hazard communication, and require employee medical surveillance and reporting. Asbestos exposure for construction work is regulated by CCR, Title 8, Section 1529, which includes exposure limits and procedures for handling and removal. Requirements for transport and disposal are included in CCR, Title 8, Sections 341.6 through 341.14.

Lead and Lead-Based Paint Abatement

Regulation of lead and LBP is described in CFR, Title 29, Section 1926.62 and CCR, Title 8, Section 1532.1. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, and monitoring. Cal/OSHA's Lead in Construction Standard requires notification and a lead compliance plan with safe work practices and a detailed plan to protect workers from lead exposure.

Safe Drinking Water and Toxic Enforcement Act

The Safe Drinking Water and Toxic Enforcement Act requires that businesses inform Californians about significant exposures to chemicals known to cause cancer, birth defects, or other reproductive harm. These chemicals may be present in products, homes, workplaces, or released into the environment. Through such disclosures, this act provides the public with information about exposure to harmful chemicals. Additionally, the legislation prohibits businesses from knowingly discharging substantial amounts of listed chemicals into drinking water sources. The act also requires the state to maintain and annually update a list of chemicals known to cause cancer, birth defects, or reproductive harm, which has expanded to include approximately 900 chemicals since its initial publication in 1987.

California's Water Code Section 13304

California's Water Code Section 13304 addresses cleanup and abatement of water pollution. The code allows the Regional Water Quality Control Boards to order individuals who have discharged waste into state waters in violation of regulations or orders to take specific actions to address the pollution, including cleanup, abatement, or other remedial actions. This could involve ceasing the discharge, taking corrective action, or overseeing cleanup efforts. The section applies to those who have discharged waste, caused or permitted the discharge, or threatened to cause it, leading to a condition of pollution or nuisance.

SWRCB's Site Cleanup Program

The SWRCB's Site Cleanup Program regulates and oversees the investigation and cleanup of "non-federally owned" sites where recent or historical unauthorized releases of pollutants to the environment, including soil, groundwater, surface water, and sediment, have occurred. Sites in the program are varied and include, but are not limited to, pesticide and fertilizer facilities, rail yards, ports, equipment supply facilities, metals facilities, industrial manufacturing and maintenance sites, dry cleaners, bulk transfer facilities, refineries, and some brownfields. These releases are generally not from strictly petroleum underground storage tanks. The types of pollutants encountered at the sites are plentiful and diverse and include solvents, pesticides, heavy metals, and fuel constituents to name a few. The SWRCB and Regional Water Quality Control Boards have legal authority to regulate site cleanup under Division 7 of the California Water Code, State Board plans and policies, and the Regional Water Quality Control Plans (Basin Plans).

California Building Code

The California Building Code includes methane seepage regulations to protect buildings from the hazards of methane gas, particularly in areas with high methane risk. These regulations require mitigation measures to prevent the accumulation of methane under and within buildings, including passive and active ventilation systems, gas monitoring, and alarm systems. The California Building Code also addresses soil vapor intrusion from VOCs through various provisions, including those related to building design, ventilation, and mitigation strategies. Mitigation methods include passive measures like vapor barriers and active systems like sub-slab depressurization.

4.6.2.3. Regional

South Coast Air Quality Management District Rules

The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for a large portion of Southern California, including all of Orange County and parts of Los Angeles, Riverside, and San Bernardino Counties. SCAQMD's primary focus is on regulating emissions from stationary sources of pollution, such as businesses and industries. SCAQMD works to improve air quality and protect public health through various regulations and programs

SCAQMD Rule 1403 governs asbestos emissions during demolition and renovation activities, including the removal and cleanup of ACM. This rule requires surveys, notifications, and adherence to specific abatement procedures. SCAQMD Procedure 5 is a component of the rule's framework for regulating asbestos abatement and cleanup. Procedure 5 allows for alternative asbestos removal methods when standard procedures might not be feasible or are deemed less effective for specific situations.

SCAQMD Rule 1466 focuses on minimizing off-site fugitive dust emissions from earth-moving activities at sites containing toxic air contaminants. Specifically, the rule applies to activities like excavating, grading, handling, treating, stockpiling, transferring, and removing soil at sites with such contaminants.

SCAQMD Rule 1166 regulates VOC emissions during the decontamination of soil. This rule specifically addresses VOC contamination from underground storage tanks, excavation, and handling of contaminated soil. The rule requires an approved mitigation plan before commencing activities involving these VOCs.

Los Angeles County Public Health Department's Solid Waste Management Program

The Los Angeles County Public Health Department, through its Solid Waste Management Program, is responsible for enforcing and permitting facilities that handle and dispose of solid waste, including hazardous waste. This program is certified by CalRecycle to act as a Local Enforcement Agency.

Los Angeles County Operational Area Emergency Response Plan

The adopted Los Angeles County Operational Area Emergency Response Plan (County of Los Angeles, 2023) applies to the unincorporated County and all incorporated cities in the County. The Operational Area Emergency Response Plan establishes the coordinated emergency management system, which includes prevention, protection, response, recovery, and mitigation in the Operational Area.

The Operational Area Emergency Response Plan does not address normal day-to-day emergencies; the operational concepts reflected in the plan focus on potential large-scale disasters that can generate unique situations requiring an unusual or extraordinary emergency response. The plan supports coordination between agencies and jurisdictions during emergency operations, public information functions, resource management, and recovery efforts. The plan also outlines procedures for operations during emergencies that includes hazardous materials spills as well as natural disasters, public health emergencies, transportation emergencies, civil disturbance, and terrorism.

The Los Angeles County Fire Department's Health Hazardous Materials Division is responsible for administering several programs in the County. These programs include the Hazardous Waste Generator Program, Hazardous Materials Release Response Plans and Inventory Program, Cal-ARP, Aboveground Storage Tank Program, and Underground Storage Tank Program. The Los Angeles County CUPA is responsible for the City of Torrance.

4.6.2.4. Local

City of Torrance General Plan

The City of Torrance General Plan (City of Torrance, 2010) outlines policies regarding hazards and hazardous materials in the Safety Element. The following objectives and policies from the current General Plan Safety Element are relevant to the Project:

- Objective S.4: To reduce the risk associated with the use, storage, transport, or disposal of hazardous waste
- Policy S.4.1: Adopt and strictly enforce the most current regulations governing hazardous waste management.
- Policy S.4.2: Minimize exposure of critical facilities and residences to hazardous materials.
- Objective S.7: To reduce the impacts related to natural and human activity hazards through a high level of emergency preparedness
- Policy S.7.1: Promote public awareness of emergency procedures for residents, the business community, City staff, and public officials.

City of Torrance's Building Code

The City of Torrance's building code incorporates that California Building Code, which includes methane seepage regulations to protect buildings from the hazards of methane gas, particularly in areas with high methane risk. These regulations require mitigation measures to prevent the accumulation of methane under and within buildings, including passive and active ventilation systems, gas monitoring, and alarm systems.

City of Torrance Local Hazard Mitigation Plan

The City of Torrance Local Hazard Mitigation Plan (City of Torrance, 2024) guides hazard mitigation planning to better protect people and property of the City of Torrance from the effects of natural hazard events. The plan identifies Hawthorne Boulevard, located approximately 0.4 mile to the west of the Project site, as the closest disaster evacuation route. Interstate 405, located approximately 1.17 miles to the north of the Project site, is the nearest freeway evacuation route.

The plan also identifies the nearest wildland area to be the Palos Verdes Estates/Rancho Palos Verdes/Rolling Hills area, which is located adjacent to the City's southern border. The Palos Verdes Estates/Rancho Palos Verdes/Rolling Hills area is designated as a Very High FHSZ within a Local Responsibility Area.

4.6.3. Environmental Impacts Analysis and Mitigation

4.6.3.1. Impact Analysis Approach

For the purposes of this section, the term "hazardous materials" refers to both hazardous substances and hazardous wastes. A "hazardous material" is defined by federal regulations as "a substance or material that ... is capable of posing an unreasonable risk to health, safety, and property when transported in commerce" (Title 49 CFR Section 171.8).

Worker and general public health are potentially at risk whenever hazardous materials have been used or where there could be an exposure to such materials. The setting and analyses presented in this section include the concepts of the "hazard" of these materials and the "risk" they pose to human health. Hazardous materials that result in adverse effects are generally considered "toxic." Other chemical materials may be corrosive or react with other substances to form other hazardous materials, but are not individually considered toxic because human organs or systems would not be affected. Because toxic materials can result in adverse health effects, they are considered hazardous materials, but not all hazardous materials are necessarily "toxic." For the purposes of this analysis, the terms "hazardous substances" and "hazardous materials" are used interchangeably and include materials that are considered toxic.

The risk to human health is determined by the probability of exposure to a hazardous material and the severity of harm such exposure would pose. The likelihood and means of exposure, in addition to the inherent toxicity of a material, are used to determine the degree of risk to human health. For example, a high probability of exposure to a low-toxicity chemical would not necessarily pose an unacceptable human health or ecological risk, whereas a low probability of exposure to a very high toxicity chemical might pose an unacceptable risk. Various regulatory agencies, such as the EPA, SWRCB, DTSC, OSHA, and Cal/OSHA, are responsible for developing and/or enforcing risk-based standards to protect human health and the environment.

4.6.3.2. Significance Criteria

Project impacts related to hazards and hazardous materials were evaluated against the CEQA significance criteria and are discussed in the following sections. The impact analysis evaluates potential proposed Project impacts during the construction phase and the operation and maintenance phase. The significance criteria listed below are based on Appendix G of the CEQA Guidelines.

Would the proposed Project:

- **HAZ-1:** Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- **HAZ-2:** Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- **HAZ-3:** Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- **HAZ-4:** Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, create a significant hazard to the public or the environment?
- **HAZ-5:** Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- **HAZ-6:** Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Appendix G of the CEQA Guidelines also includes a significance criterion for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, stating that the project would have a significant effect if the project would result in a safety hazard or excessive noise for people residing or working in the project area. The closest airport, Torrance Municipal Airport (Zamperini Field), is approximately 3 miles south of the Project site; therefore, this significance criterion is not applicable to the Project because the Project is not located within an airport land use plan and is not located within two miles of a public airport or public use airport.

4.6.3.3. Environmental Impact Analysis

As described in Section 2, Project Description, the proposed Project would include developing a Class A industrial warehouse building, including 15,000 square feet of office space on 31.3 acres of currently vacant land. The proposed building would include 56 dock doors on the northeastern portion of the building. The proposed Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. The proposed Project also includes future road improvements (including installation of a sewer line) along Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court, totaling an additional 7.79 acres.

There are two primary categories of hazards and hazardous materials impacts that would occur as a result of the proposed Project. The first category would be impacts associated with Project construction, including the use of hazardous materials for construction activities and the removal of hazardous waste from the Project site. The second category of hazards and hazardous materials impacts would be the impacts associated with operation and maintenance of the proposed Project after construction is complete. Since the future occupants of the building are currently unknown, Option 1 – Single Tenant Building and Option 2 – Multi-Tenant Building are being considered. Impacts for both Option 1 – Single Tenant, and Option 2 – Multi-Tenant are identical.

As stated previously, the Refinery is currently the subject of CAOs from the LARWQCB for releases at and from the Refinery (CAO Numbers 88-43, 89-136, and 95-116), and the Project site is also within the area subject to those orders. Prior to any construction activities associated with the proposed Project, remediation work will be performed with the oversight of the LARWQCB. A Response Plan and SMP have been prepared and are under review by the LARWQCB. The SMP and Response Plan are included as Appendix C (SCS Engineers, 2025a and 2025b).

As noted in Section 2.3.1, under the proposed Project, the Response Plan and SMP would be implemented in general accordance with the California Land Reuse and Revitalization Act (CLRRRA) of 2004. Prologis entered into the CLRRRA Agreement, and would be responsible for implementing the Response Plan. Prologis would redevelop the property to implement the proposed Project after remediation has occurred. Implementation of the Response Plan will occur irrespective of Project approval with the appropriate environmental clearance processed by LARWQCB.

The remediation process would include the implementation of ex-situ solidification (ESS) or in-situ solidification (ISS) treatments. Specifically, the remediation process would include the following steps:

1. **Stockpiling Soils:** Prior to implementing ESS or ISS treatments, soils that meet regulatory screening criteria and are determined to be acceptable for reuse from soil sampling testing would be excavated and stockpiled onsite for future reuse as ESS/ISS cover material.
2. **Ex-Situ Solidification (Shallow Soils):** Shallow soil would be excavated to prepare load-bearing pads for ISS equipment, which consists of a large drill rig. The excavated soil would undergo ESS treatment in place where soil is mixed in the bucket with Portland cement and water to immobilize the soil contaminants through soil cementation/solidification. The generated ESS material, once partially cured for approximately 12-24 hours, will be placed into pre-excavated areas and re-compacted.
3. **In-Situ Solidification (Deeper Soils):** For deeper soil impacts, ISS would be used. ISS would use a large diameter drill rig equipped with an 8-foot-wide auger. During drilling, a grout mixture of Portland cement and water would be pumped through the hollow stem of the drill rig and into the auger's injection ports, allowing it to disperse throughout the soil matrix to immobilize soil contaminants. The rotating auger would thoroughly mix the grout with the existing soil while moving downward to create a homogeneous cementitious column(s) to the design depth (not to exceed the development depth of 60 feet above mean sea level or approximately 30 feet below grade).
4. **Cleanup:** Following ESS/ISS remediation, the disposal/treatment area would be covered with a 5-foot thick layer of clean soil, then paved at the surface. Clean soil would be sourced from the designated cut and fill areas and/or imported from an approved/pre-screened offsite source.

After remediation and with implementation of the SMP and Response Plan, the site would allow for redevelopment of industrial uses to proceed.

Impact HAZ-1: Create a risk to the public or the environment from the routine use, transport, storage, and disposal of hazardous materials.

Construction

LESS THAN SIGNIFICANT. As discussed in Section 4.6.2, activities involving hazardous materials are heavily regulated at the federal, state, and local levels; these regulations are promulgated and enforced by agencies such as the EPA, SWRCB, DTSC, Cal/OSHA, SCAQMD, CHP, and Caltrans. The Applicant would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous materials releases. Additional discussion of the Project's impacts are discussed in the following sections.

Hazardous Waste Remediation

As discussed in Section 4.6.1, known releases from the Refinery have affected the soil, soil vapor, and groundwater beneath the Project site. Subsequent remediation work will be performed with oversight from the LARWQCB. The grading plan indicates that the Project's grading operation would excavate approximately 49,200 cubic yards of cut and require approximately 340,700 cubic yards of fill. Approximately 5,000 cubic yards of contaminated soil export would be required during remediation.

The Phase II Investigation Report (SCS Engineers, 2018b; Appendix K) completed for the Project site includes the following conclusions and recommendations to reduce potential hazards during construction:

- Friable ACMs are present within the Refinery disposal area on the Project site. Soil at the Project site also contains asbestos at concentrations up to 5%. The soil samples with the highest asbestos concentrations are located in the Refinery disposal area, with lower concentrations in the immediately surrounding area. Any excavation of soil from or surrounding the disposal area must be conducted under a SCAQMD Procedure 5 permit in accordance with Rule 1403.

- A previous investigation by Stantec identified elevated methane (up to 23%) and fuel-related VOCs in soil vapor on the Project site (SCS Engineers, 2018b; Appendix K). Therefore, appropriate vapor intrusion and methane protection measures must be evaluated for the future building on the Project site.
- Current and previous investigations have identified metals, including arsenic (up to 54 mg/kg), total lead (up to 14,000 mg/kg), chromium (up to 2,400 mg/kg), copper (up to 1,400 mg/kg), and mercury (up to 53 mg/kg) in one or more samples on the Project site. The soluble analyses for lead show up to 1,000 mg/l STLC lead and up to 21 mg/l TCLP lead. SCAQMD Rule 1466 would apply to particulate emissions from soils with toxic air contaminants caused by any excavation or earthwork in the Refinery disposal area.
- Primary contaminants at the Project site include fuel-related hydrocarbons, VOCs, and SVOCs. TPH and VOCs are present above screening levels in the Refinery disposal area, and therefore, would be considered a potential threat to groundwater by the LARWQCB. SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) would require monitoring for VOCs during any excavation or earthwork.
- The vertical extent of hydrocarbons at one of the borings was not defined. Impacts extend to about 51 feet msl, which is approximately 20 feet above groundwater. As a result, further investigation is warranted.

During a geotechnical investigation conducted for the Project site, free water was not encountered (Kimley-Horn, 2024; Appendix Q). The lack of free water and the moisture level of the samples led the investigators to estimate that the groundwater at the site is more than 30 feet below the ground surface. Further, historically the groundwater levels typically read between 48 feet and 77 feet below ground surface from 2005-2017 (<http://geotracker.waterboards.ca.gov>). A geotechnical design update prepared for the Project site (Leighton, 2023) states that all undocumented fill under the proposed building footprint, extending down to 50 feet above msl, would be over-excavated and recompacted to support the new building. As stated in Section 4.6.1, the two shallowest hydrogeological units beneath the Project site include a perched aquifer, which first occurs at approximately 30 to 32 feet above msl, and the Gage-Gardena Aquifer, which first occurs at approximately 1 to 4 feet below msl.

Given the depths of these hydrological units and the need to excavate down to 50 feet above msl, groundwater could be encountered during excavation activities, requiring dewatering.⁴² The dewatering of contaminated groundwater could inadvertently draw in contaminated water or soil from nearby areas, potentially spreading pollution, as well as result in a health hazard to construction workers conducting dewatering activities.

The control and cleanup activities in the Response Plan and SMP provided in Appendix C (SCS Engineers, 2025a and 2025b) include procedures for remediating contaminated soil and groundwater and implementing health and safety measures to protect the general public and workers in the construction area. Therefore, the remediation activities would not create a risk to the public or the environment.

To ensure that workers at the Project site are not exposed to unacceptable levels of risk associated with the handling of hazardous materials in soil and groundwater, the Project would be required to adhere to existing hazardous materials regulations, with compliance monitored by state (e.g., OSHA in the workplace or DTSC for hazardous waste) and local jurisdictions (e.g., fire departments). Compliance with existing safety standards related to the handling and storage of hazardous materials, and compliance with the safety procedures mandated by applicable federal, state, and local laws and regulations (RCRA, principles prescribed by California Department of Health Services, Centers for Disease Control and Prevention, and National Institutes of Health) would be mandated. Employees who would work around

⁴² In construction, dewatering is the process of removing surface or groundwater from a site to make it dry and stable, allowing for construction activities like excavation.

hazardous materials would be required to wear appropriate protective equipment, and safety equipment would be routinely available in all areas where hazardous materials are being handled.

Hazardous Materials Disposal and Transportation

Contaminated soil and wastes would be disposed of in accordance with federal, state, and local requirements. The Los Angeles County Public Health Department manages enforcement and permitting for facilities that receive and dispose of solid waste, including hazardous waste. Hazardous materials, such as contaminated soil and other wastes, would be transported along designated truck routes and/or major streets connecting to the Project site.

The USDOT Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, as described in Title 49 of the CFR, and implemented by CCR, Title 13. All material transport is required to take place under manifest, and compliance with Title 22 requires that transporters take immediate action to protect human health and the environment in the event of spill, release, or mishap. As discussed in Section 4.6.2, the transportation of hazardous materials would comply with state regulations governing hazardous materials transport included in the California Vehicle Code (CCR, Title 13), State Fire Marshal Regulations (CCR, Title 19), and CCR, Title 22. CCR, Title 13 requires all motor carrier transporters of hazardous materials to have a Hazardous Materials Transportation License issued by the CHP, and placards identifying that hazardous materials are being transported must be displayed on the vehicle. California Vehicle Code Section 31303 requires that hazardous materials be transported via routes with the least overall travel time and prohibits the transportation of hazardous materials through residential neighborhoods. Under Chapter 13, Division 4.5 of Title 22, each truck, trailer, semitrailer, or container used for shipping hazardous waste must be designed and constructed, and its contents must be limited, so that under conditions normally incident to transportation, there would be no release of hazardous waste to the environment. With compliance with existing regulations, the routine disposal and transportation of hazardous materials during construction would not create a risk to the public or the environment.

Hazardous Materials Use and Storage

Construction of the Project would require the use of typical construction equipment (e.g., gasoline- or diesel-powered machinery) and vehicles containing fuel, oil, and grease, as well as the use and storage of these materials. Limited quantities of certain hazardous materials such as paints, solvents, and glues would also be used during construction. There is a low likelihood that substantial quantities of hazardous materials would be used or stored during construction. Moreover, these hazardous materials would not include acutely hazardous materials or substances listed in Title 40 CFR Part 355, Appendix A: Extremely Hazardous Substances and Their Threshold Planning Quantities (a requirement under EPCRA, discussed in Section 4.6.2.1).

Should the use and/or storage of hazardous materials at the Project site rise to a level subject to regulation, those uses would be required to comply with federal and state laws discussed in Section 4.6.2, to eliminate or reduce the consequences of hazardous materials accidents resulting from the routine use and storage of hazardous materials on the Project site during construction. Hazardous materials that present a moderate explosion hazard, high fire or physical hazard, or health hazard would be required to be stored in designated areas designed to prevent an accidental release to the environment.

In accordance with SWRCB regulations, the Applicant would obtain and comply with a National Pollutant Discharge Elimination System permit, specifically the SWRCB's Construction General Permit. As part of the Construction General Permit, the Applicant's Contractor would be required to prepare and implement a stormwater pollution prevention plan (SWPPP), which would include best management practices (BMPs),

including the following or similar measures to minimize the risk of accidental spills of hazardous materials during construction:

- Vehicles and equipment would be maintained in proper working condition to minimize potential fugitive emissions of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. Service/maintenance vehicles would carry materials to absorb leaks or spills. Servicing, refueling, and staging of construction equipment would take place only at designated areas where a spill would not flow to drainages. Equipment washing, if needed, would be conducted only in designated locations where water would not flow into drainage channels.
- Drainage BMPs to protect water quality, such as oil/water separators, catch basin inserts, storm drain inserts, media filtration, and catch basin screens, would be implemented. Spill cleanup materials (e.g., rags, absorbent materials, and secondary containment) would be kept at the work site when handling materials.
- Hazardous spills would be reported to the designated CUPA (i.e., Los Angeles County Fire Department's Health Hazardous Materials Division) and would be cleaned up immediately, and contaminated soil would be properly disposed of at a licensed facility. A properly designed, centralized storage area that would keep hazardous materials fully contained would be specified.

By implementing the SWPPP and associated BMPs, construction-related hazardous substances, such as oil and grease, would be managed through appropriate material handling and BMPs. Therefore, the routine use and storage of hazardous materials during construction would not create a risk to the public or the environment.

Impact Summary

With compliance with standard regulations, as well as implementation of the control and cleanup activities in the Response Plan and SMP provided in Appendix C (SCS Engineers, 2025a and 2025b), Project construction would not create a risk to the public or the environment from the routine use, transport, storage, and disposal of hazardous materials. Therefore, impacts would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT. During the operations and maintenance phase, contaminated soil and groundwater would have been largely remediated during the construction phase (see discussion above). In addition, no ground disturbance would be required for operations and maintenance. Furthermore, any use, transport, storage, or disposal of hazardous materials by the future tenant(s) would be highly regulated under federal, state, and local laws to minimize risks to the public or the environment. However, because of the potential for methane and fuel-related VOCs in soil vapor on the Project site, the Project could create a risk to the public or the environment during the operations and maintenance phase.

Elevated methane levels in soil vapor are a concern for buildings primarily to due to the potential for explosive and asphyxiation hazards. Methane, while non-toxic, can displace oxygen in confined spaces, leading to asphyxiation. Additionally, methane is highly flammable, and high concentrations (above 50,000 parts per million) pose a significant risk of combustion and explosion. Soil vapor affected by fuel-related VOCs is also a concern for buildings because this vapor can migrate into buildings, potentially contaminating indoor air and posing health risks. Vapor intrusion controls that would be implemented as part of the Response Plan in Appendix C (SCS Engineers, 2025a) would minimize any hazards to the public or the environment resulting from soil vapor. In addition, during operational activities, compliance with existing hazardous materials and waste handling, storage, and transport regulations, as discussed in Section 4.6.2, would prevent any risks to the public or environment associated with the proposed warehouse operations at the Project site. Therefore, impacts from Project operations and maintenance would be less than significant.

Impact HAZ-2: Create a risk to human health and the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

Construction

LESS THAN SIGNIFICANT. As discussed under Impact HAZ-1, known releases from the Refinery have affected the soil, soil vapor, and groundwater beneath the Project site. The control and cleanup activities in the Response Plan and SMP provided in Appendix C (SCS Engineers, 2025a and 2025b) would be implemented under the lead oversight of the LARWQCB and include procedures for remediating contaminated soil and groundwater and implementing health and safety measures to protect the general public and workers in the construction area. Therefore, impacts from Project construction would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT. As discussed under Impact HAZ-1, vapor intrusion controls in the proposed building that would be implemented as part of the Response Plan in Appendix C (SCS Engineers, 2025a) would minimize risks to human health and the environment resulting from soil vapor. In addition, during operational activities, compliance with existing hazardous materials and waste handling, storage, and transport regulations, as discussed in Section 4.6.2, would prevent upset or accident conditions associated with the proposed warehouse operations at the Project site. Therefore, impacts from Project operations and maintenance would be less than significant.

Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Construction

NO IMPACT. The Project site is located more than one-quarter mile from the nearest existing school, the South Bay Christian School, which is approximately 0.8 mile west of the Project site; therefore, Project construction would result in no impacts.

Operations and Maintenance

NO IMPACT. The Project site is located more than one-quarter mile from an existing school; therefore, Project operations and maintenance would result in no impacts.

Impact HAZ-4: Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Construction

LESS THAN SIGNIFICANT. The Project is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The Project site, referred to as the “North Posse Site,” is a Cleanup Program Site with an open case (<http://geotracker.waterboards.ca.gov>). A Cleanup Program Site, under the SWRCB’s Site Cleanup Program (see Section 4.6.2.2), is a location where contaminated soil, groundwater, or other environmental media need to be remediated to protect human health and the environment. These sites often result from past industrial activities, spills, or other unauthorized releases of hazardous materials. The contaminants at the Project site that are being addressed under this program are discussed under Impact HAZ-1 under “Hazardous Waste Remediation.”

As part of the Site Cleanup Program, subsequent remediation work will be performed with oversight from the LARWQCB as discussed in the Response Plan and SMP provided in Appendix C (SCS Engineers, 2025a and 2025b). The SMP and Response Plan include procedures for remediating contaminated soil and

groundwater and implementing health and safety measures to protect the general public and workers in the construction area. Therefore, impacts from Project construction would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT. As discussed under Impact HAZ-1, vapor intrusion controls in the proposed building that would be implemented as part of the Response Plan in Appendix C (SCS Engineers, 2025a) would minimize risks to human health and the environment resulting from soil vapor. Therefore, impacts from Project operations and maintenance would be less than significant.

Impact HAZ-5: Impair or interfere with an adopted emergency response plan or emergency evacuation plan.

Construction

LESS THAN SIGNIFICANT. The City of Torrance Local Hazard Mitigation Plan (City of Torrance, 2024) identifies Hawthorne Boulevard, located approximately 0.4 mile to the west of the Project site, as the closest disaster evacuation route. Interstate 405, located approximately 1.17 miles to the north of the Project site, is the nearest freeway evacuation route.

As discussed in Section 4.8 (Transportation), construction of the proposed Project would result in the generation of vehicular traffic consisting of automobiles, light-duty trucks, and dump trucks associated with workers commuting to the site, equipment and materials being transported to the site, and dump trucks transporting imported earthwork to the site and exported waste/demolition material from the site. During the 35-month construction period, the Project would require approximately 292,000 cubic yards of imported soil. Approximately 5,000 cubic yards of export would be required during remediation. As the typical capacity of a dump truck is 15 cubic yards, the import activities would generate an average of 203 truck trips per day and 25 truck trips per hour for an eight-hour working day.

Although this level of truck traffic would be noticeable, these additional trips would not interfere with emergency response or evacuation because the vehicles would use designated truck routes, the truck volumes are relatively low compared to the existing traffic volumes on the roadways in the Project area, and the increased traffic would be temporary. In addition, the Project site is in a highly urbanized area with several roadways in the surrounding area that could serve as alternative evacuation or emergency response routes. Project construction would not impair or interfere with an adopted emergency response plan or emergency evacuation plan; therefore, impacts would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT. Emergency access to the Project site would be provided by two driveways on Del Amo Boulevard and one driveway on Prairie Avenue. The east driveway on Del Amo Boulevard would become the north leg of the existing Del Amo Boulevard/Maple Avenue intersection, which is signalized. The traffic signal would be modified so that the signal would serve the north leg of the intersection, which would be the new driveway. The west driveway on Del Amo Boulevard and the driveway on Prairie Avenue would accommodate only right turns into and out of the Project site because existing medians on these roadways prevent left turn movements.

The proposed access features at the Project site, including the driveways, parking lots, and on-site circulation routes, would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The driveways are subject to and must satisfy the City's design requirements and would be subject to approval by City staff. Emergency vehicles could readily access the Project site via the driveways and on-site travel corridors. In addition, no operations on the Project site would result in any interference with emergency response or evacuation procedures, including the use of the closest designated evacuation route along Hawthorne Boulevard, since no lane or roadway closures would be

required. Project operations and maintenance would not impair or interfere with an adopted emergency response plan or emergency evacuation plan; therefore, impacts would be less than significant.

Impact HAZ-6: Expose people or structures to a significant risk of loss, injury, or death from wildland fires.

Construction

LESS THAN SIGNIFICANT. CALFIRE's map of FHSZs shows that the Project site is not located within an FHSZ (CALFIRE, 2025). The area surrounding the Project site is fully developed with commercial, industrial, and residential uses, and no wildlands are located within proximity to the Project site. The City of Torrance Local Hazard Mitigation Plan (City of Torrance, 2024) identifies the nearest wildland area to be the Palos Verdes Estates/Rancho Palos Verdes/Rolling Hills area, which is located adjacent to the City's southern border and is designated as a Very High FHSZ within a Local Responsibility Area. However, this wildland area is located approximately 3.6 miles south of the Project site.

While the Project site is not designated as a FHSZ, the site is currently an undeveloped parcel that consists of an open area of vegetation, including brush that could serve as fuel for a fire. Therefore, fire risks could result from various equipment-related ignition sources, including sparks from hot work, exhaust systems, and equipment malfunctions.

Standard safety precautions required under OSHA and Cal/OSHA to reduce fire risks would be implemented during construction, including but not limited to:

- Implementing a fire watch during tasks involving welding, cutting, and other hot work processes,
- Having adequate fire suppression equipment,
- Strictly prohibiting smoking on site or designating smoking areas away from flammable materials,
- Inspecting electrical equipment regularly to ensure proper wiring and avoiding overloading circuits,
- Conducting regular inspections to identify and address potential fire hazards, such as accumulated debris or improperly stored materials,
- Ensuring fire alarms and sprinklers are installed and properly functioning,
- Regularly removing construction waste and debris,
- Properly storing and handling flammable materials and keeping them away from ignition sources,
- Storing combustible materials in designated areas, away from fire hazards and within reasonable distances from building structures,
- Following OSHA guidelines for construction fire safety, and
- Providing regular training to all workers on fire safety procedures and the use of fire protection equipment.

By implementing these standard practices, the risk of fire during construction would be substantially reduced. Therefore, impacts from Project construction would be less than significant.

Operations and Maintenance

NO IMPACT. The area surrounding the Project site is fully developed with commercial, industrial, and residential uses, and no wildlands are located within proximity to the Project site. After Project implementation, the undeveloped land that comprises the Project site would have been developed with a building and paved parking areas, with no open areas of vegetation that could serve as fuel for a fire. Therefore, Project operations and maintenance would result in no impacts.

4.6.3.4. Mitigation Measures

No mitigation is required.

4.6.4. Cumulative Impact Analysis

This cumulative impact analysis related to hazards and hazardous materials addresses the impacts of the proposed Project in combination with the impacts of the other proposed development projects.

Geographic Extent/Context

The geographic extent of this cumulative analysis includes the Project site and adjacent properties. No present or probable future projects are listed in Table 3-1 on adjacent properties. Past activities that have affected the Project site and adjacent properties related to hazards and hazardous materials are described above in Section 4.6.1, Environmental Setting.

Cumulative Impact Analysis

The adjacent properties surrounding the Project site are fully developed with commercial, industrial, and residential uses. Therefore, substantial development in the immediate area is not anticipated. However, as documented in the Phase I Environmental Site Assessment (SCS Engineers, 2018a; Appendix J) and Phase II Investigation Report (SCS Engineers, 2018b; Appendix K) completed for the Project site, numerous cleanup efforts are underway within the Refinery and on the Project site itself under the oversight of the LARWQCB, DTSC, and/or other appropriate regulatory agencies, which set site-specific performance standards for these cleanup efforts to protect water quality, human health, and the environment both during and after remediation activities. With the implementation of these cleanup efforts to meet applicable regulatory performance standards, cumulative impacts would be anticipated to be beneficial and less than cumulatively considerable for Impacts HAZ-1, HAZ-2, and HAZ-4, since contaminated soil and groundwater will have been remediated as a result of these efforts providing regional-level benefits since the aquifers are regional in nature. Because the Project site and adjacent properties are not located within one-quarter mile of an existing or proposed school, no cumulative impacts would result for Impact HAZ-3.

The Project would have a minimal contribution to cumulative impacts related to emergency response and evacuation during construction with the additional truck traffic generated by construction activities. These impacts, in combination with other construction and operations activities on adjacent properties, would not be cumulatively considerable because several roadways in the surrounding area could serve as alternative evacuation or emergency response routes. Project operations would not contribute to any cumulative impacts related to emergency response or evacuation under Impact HAZ-5.

Finally, with implementation of the Project, the undeveloped, vegetated area that currently comprises the Project site would be fully developed with a building and paved parking areas, thereby reducing the any fire risks. Therefore, the Project would contribute to beneficial and less than cumulatively considerable impacts related to fires under Impact HAZ-6.

4.6.5. Summary of Significance Findings

Table 4.6-1 provides a summary of each identified hazards and hazardous materials impact and associated mitigation measures to reduce or avoid the impact (where warranted). Mitigation measures are required for each significant impact but are not required for impacts that are not significant.

Table 4.6-1. Summary of Hazards and Hazardous Materials Impacts and Mitigation Measures

Impacts	Mitigation Measures
Impact HAZ-1: Create a risk to the public or the environment from the routine use, transport, storage, and disposal of hazardous materials.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact HAZ-2: Create a risk to human health and the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact HAZ-4: Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact HAZ-5: Impair or interfere with an adopted emergency response plan or emergency evacuation plan.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact HAZ-6: Expose people or structures to a significant risk of loss, injury, or death from wildland fires.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.

4.7. Noise

This section describes the fundamentals of noise, the existing environmental setting for noise, applicable regulations associated with noise, thresholds for significant noise impacts, and the sound levels that may result in short-term construction-related impacts, as well as future buildout conditions. The analysis is based on the Noise Impact Analysis prepared by Urban Crossroads (2025) for the Project and included in Appendix M, unless otherwise referenced.

The proposed Project's potential effects related to noise were evaluated using the criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are discussed in more detail in Section 4.7.3.3, Environmental Impact Analysis. The analysis concludes that the proposed Project impacts associated with noise would be less than significant.

During the scoping period for the Environmental Impact Report (EIR) (March 28, 2025, to April 28, 2025), verbal and written comments were received from agencies, organizations, and the public. These comments identified various issues and concerns relevant to the EIR analysis. The following issues related to noise were raised during the scoping period and are addressed in this section.

- Although the logistics industry is an important component of the economy, warehouses can result in environmental impacts, including those related to air quality and health, noise, and transportation.
- Land use conflicts between warehouses and sensitive receptors must be avoided, and impacts from any unavoidable conflicts must be mitigated.
- The Attorney General Office's Bureau of Environmental Justice requests consideration of a guidance document that contains best practices and mitigation measures for warehouse projects.

Potential Noise Sources

The proposed Project would develop a Class A warehouse totaling approximately 403,033 square feet, including 362,730 square feet designated as a High-Cube Fulfillment Center and 40,303 square feet as a High-Cube Cold Storage Warehouse. A preliminary site plan for the Project is provided in Section 2, Project Description (Figure 2-2, Project Site).

On-site operational noise sources are anticipated to include cold storage loading dock activities, tractor-trailer storage operations, rooftop air conditioning units, parking lot vehicle movements, trash enclosure operations, and truck circulation. This noise analysis evaluates potential noise level impacts associated with typical operational activities at the Project site, assuming 24-hour operations, seven days per week.

At the time of this analysis, future tenants have not been identified; however, operations are assumed to be consistent with typical high-cube warehouse uses, including fulfillment center and cold storage. Consistent with the Project Description, this analysis considered both Option 1 – Single Tenant Building and Option 2 – Multi-Tenant Building for the site's future operational conditions.

Noise Fundamentals

Sound is defined as any variation in air pressure that can be detected by the human ear. Noise is typically described as unwanted sound and is often considered objectionable because it is disturbing or annoying. The objectionable qualities of sound are generally related to its pitch or loudness. Pitch refers to the frequency of the vibrations that produce sound; generally, intermediate-pitched sounds are perceived as louder by the human ear than sounds of lower or higher frequencies. Loudness is determined by the amplitude or intensity of sound waves, combined with the ear's sensitivity to those waves; in general, higher amplitudes correspond to louder perceived sounds.

Technical acoustical terms used in this section are defined in Table 4.7-1. The fundamental model of acoustics consists of three components: a sound (i.e., noise) source, a receptor, and the propagation path

between them. The loudness of the source, along with any obstructions or atmospheric conditions affecting the propagation path, determines the sound level and the characteristics of the noise perceived by the receptor.

The amplitude of pressure waves generated by a noise source determines the perceived loudness. Although sound pressure amplitude is measured in micropascals (mPa), the wide range of pressure values encountered (from less than 100 to over 100,000,000 mPa) necessitates the use of a logarithmic scale. Consequently, sound pressure levels are typically expressed in decibels (dB).

The dB scale alone does not fully characterize how humans perceive noise. To approximate the sensitivity of the human ear, sound levels across individual frequency bands are weighted based on human auditory response. The most common metric is the A-weighted sound level (dBA), which approximates the response of the average young ear to most ordinary sounds. People's judgments regarding the relative loudness or annoyance of a sound generally correlate well with A-weighted sound levels.

Because decibels are logarithmic units, sound pressure levels cannot be combined or subtracted through simple arithmetic. On the dB scale, a doubling of sound energy results in an increase of approximately 3 dB. Thus, when two identical sound sources are producing the same energy, their combined sound level at a given location would be 3 dB higher than the level from a single source. For example, if one excavator produces a sound pressure level of 80 dBA at a specific location, two excavators operating simultaneously at the same location would produce a combined level of approximately 83 dBA—not 160 dBA. The cumulative sound level from multiple sources, such as several pieces of construction equipment, can be determined using logarithmic decibel addition. Typical environmental noise levels are presented in Table 4.7-1.

Table 4.7-1. Typical Noise Levels in the Environment

Common Outdoor Noise Source	Noise Level (dBA)	Common Indoor Noise Source
	120 dBA	
Jet fly-over at 984 feet		Rock concert
	110 dBA	
Pile driver at 100 feet	100 dBA	
		Night club with live music
	90 dBA	
Large truck passes by at 50 feet		
	80 dBA	Noisy restaurant
		Garbage disposal at 3 feet
Gas lawn mower at 100 feet	70 dBA	Vacuum cleaner at 10 feet
Commercial/urban area daytime		Normal speech at 3 feet
Suburban expressway at 300 feet	60 dBA	
Suburban daytime		Active office environment
	50 dBA	
Urban area nighttime		
	40 dBA	
Suburban nighttime		
Quiet rural areas	30 dBA	Library
		Quiet bedroom at night

Common Outdoor Noise Source	Noise Level (dBA)	Common Indoor Noise Source
Wilderness area	20 dBA	
	10 dBA	Quiet recording studio
Threshold of human hearing	0 dBA	Threshold of human hearing

Note: dBA = A-weighted decibels

Source: Caltrans, 2013

Environmental sounds are often described using an average sound level that represents the same acoustical energy as the total of all time-varying events. This average level is known as the equivalent continuous sound level, or L_{eq} . Although a common averaging period is one hour, the L_{eq} can describe noise levels over any specified duration. In addition to the L_{eq} , two other noise metrics— L_{dn} (Day-Night Average Sound Level) and CNEL (Community Noise Equivalent Level)—are used in this report. Definitions for L_{eq} , L_{dn} , and CNEL are provided in Table 4.7-2.

Table 4.7-2. Definitions of Acoustical Terms

Acoustical Term	Definition
Sound	A vibratory disturbance created by a vibrating object, which when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism such as the human ear or a microphone.
Noise	Typically defined as sound that is undesirable.
Sound Pressure Level	Sound pressure level is the quantity that is measured directly by a sound level meter. Noise sources are often described using a sound pressure level in dBA at a specified distance.
Decibel (dB)	A unit describing the amplitude of sound equal to 20 times the logarithm to base 10 of the ratio of the pressure of the sound measured to a reference pressure. The reference pressure for air is 20 mPa.
Frequency, Hertz (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure.
A-Weighted Sound Level (dBA)	The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low- and very high-frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Equivalent Continuous Sound Level (L_{eq})	The energy-averaged A-weighted noise level during the measurement period. The hourly L_{eq} is used for this analysis.
Community Noise Equivalent Level (CNEL)	The energy-averaged A-weighted noise level during a 24-hour day, which is obtained by adding 5 dB to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dB to sound levels between 10:00 p.m. and 7:00 a.m.
Day/Night Sound Level (L_{dn})	The energy-averaged A-weighted noise level during a 24-hour day, which is obtained by adding 10 dB to sound levels measured at night between 10:00 p.m. and 7:00 a.m.

Note: mPa = micropascals

Noise Attenuation

When noise propagates over a distance, the noise level decreases, or attenuates, depending on the type of noise source and the characteristics of the propagation path. Noise from a localized source (i.e., a point source) spreads uniformly outward in a spherical pattern, a phenomenon referred to as spherical spreading. For a point source—such as mechanical or electrical equipment (e.g., an air conditioning unit) or an idling vehicle (e.g., a tractor or semi-truck)—sound levels typically decrease at a rate of approximately 6 dBA per doubling of distance over acoustically soft sites.

Soft sites are those with absorptive ground surfaces, such as vegetation or loose soil, which contribute to additional attenuation. Hard sites, by contrast, consist of reflective surfaces such as asphalt, concrete, or smooth bodies of water. At hard sites, no excess ground attenuation is assumed; the reduction in noise levels is limited to geometric spreading, with an excess ground attenuation adjustment of approximately 1.5 dBA per doubling of distance typically applied where appropriate. For example, an outdoor condenser fan producing a sound level of 60 dBA at 50 feet over a hard site would attenuate to approximately 54 dBA at 100 feet and 48 dBA at 200 feet from the source.

Natural topography (such as hills, ravines, or berms) and constructed barriers (such as buildings or sound walls) that obstruct the line-of-sight between a noise source and a receptor can further reduce noise levels when the receptor is located within the "shadow zone" of the obstruction. This reduction is known as barrier insertion loss. If a receptor is positioned behind a barrier but retains partial visibility of the noise source, insertion loss still occurs but to a lesser extent. Noise barriers can provide reductions in noise levels ranging from approximately 5 dBA (when the barrier just breaks the line-of-sight) to as much as 20 dBA with a sufficiently large and properly designed barrier (Caltrans, 2013).

Human Responses to Noise

The human response to environmental noise is subjective and varies considerably among individuals. While community noise is not typically associated with direct physiological harm, such as hearing impairment at normal exposure levels, it is often cited as a health concern due to its effects on general well-being, stress levels, and overall quality of life. The health impacts of community noise primarily arise from its interference with critical human activities, including sleep, speech, recreation, and tasks requiring concentration or coordination.

Hearing loss can occur at the highest intensity levels of noise exposure. However, in most community settings, the primary concern is the contribution of noise to stress, disruption of daily activities, and increased public annoyance with the noise source. These effects form the basis for land use planning policies aimed at minimizing exposure to excessive community noise levels and protecting public health and welfare.

There is no completely satisfactory method for measuring the subjective effects of noise or the corresponding reactions of annoyance and dissatisfaction. This difficulty arises primarily from the wide variation in individual thresholds of annoyance and differences in habituation based on personal experiences with noise. An important method for evaluating a person's subjective response to a new noise source is to compare it to the existing environment to which individuals have already adapted—the so-called ambient environment.

In general, the greater the increase of a new noise above the existing ambient noise level, the less acceptable the new noise is likely to be perceived. With regard to increases in A-weighted noise levels, an understanding of the following general relationships is helpful in interpreting this analysis:

- Except in carefully controlled laboratory experiments, a change of 1 dB cannot be perceived by humans;
- Outside of the laboratory, a 3-dB change is considered a just-perceivable difference;
- A change in a level of at least 5 dB is required before any noticeable change in community response would be expected. An increase of 5 dB is typically considered substantial;
- A 10-dB change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Effects of Noise on Human Activities

The extent to which environmental noise causes increased levels of annoyance, activity interference, and sleep disruption varies significantly among individuals and depends on several factors, including the

loudness or suddenness of the noise, the perceived information value of the noise (e.g., aircraft overflights, a child crying, fire alarms), and an individual's sleep state and sleep habits. Over time, individuals may also adapt to recurring noise events and elevated ambient noise levels.

In the context of land use compatibility, environmental noise is commonly evaluated based on its potential to increase annoyance, disrupt sleep, or interfere with speech communication, daily activities, and learning. Noise-related effects on human activities are discussed in more detail below (Caltrans, 2011).

Speech Communication

For most noise-sensitive land uses, an interior noise level of 45 dBA L_{eq} is generally identified as necessary to protect speech communication and ensure 100 percent intelligibility of speech sounds. Assuming an average outdoor-to-indoor sound reduction of approximately 20 dB (a typical level of attenuation with windows closed), this interior standard corresponds to an exterior noise level of approximately 65 dBA L_{eq} .

For outdoor voice communication, an exterior noise level of 60 dBA L_{eq} typically allows for normal conversation at distances up to 2 meters with approximately 95 percent sentence intelligibility. Based on these thresholds, speech interference generally begins to occur when steady noise levels reach approximately 60 to 65 dBA.

Annoyance and Sleep Disruption

Land use compatibility determinations related to potential increases in annoyance, activity interference, and sleep disruption are typically based on cumulative noise exposure metrics, such as CNEL or L_{dn} . One of the most comprehensive and widely accepted evaluations of the relationship between noise exposure and community annoyance was developed by Theodore J. Schultz in 1978 (Schultz, 1978). Schultz's research provided the foundational support for the use of L_{dn} as a standard descriptor for environmental noise impacts.

Schultz's work identified a correlation between cumulative noise exposure and the percentage of individuals who reported being highly annoyed by transportation noise. This relationship, when expressed graphically, is referred to as the Schultz curve and continues to serve as a basis for noise standards. According to the Schultz curve, approximately 13 percent of the population is highly annoyed at a noise exposure level of 65 dBA L_{dn} . The curve also shows that the percentage of individuals describing themselves as highly annoyed increases steadily between 55 and 70 dBA L_{dn} , with 65 dBA L_{dn} often cited as a key threshold separating lower and higher rates of reported annoyance.

Allowing for an average exterior-to-interior noise reduction of approximately 20 dB, an exterior noise level of 65 dBA CNEL/ L_{dn} would correspond to an interior noise level of 45 dBA CNEL/ L_{dn} . An interior noise level of 45 dBA CNEL/ L_{dn} is generally considered sufficient to protect against activity interference at most noise-sensitive land uses, including residential dwellings, and is also adequate to prevent sleep disruption.

Within California, the California Building Code establishes 45 dBA CNEL as the maximum acceptable interior noise level for residential uses, excluding detached single-family dwellings. The use of the 45 dBA CNEL/ L_{dn} threshold is further supported by the State of California Governor's Office of Planning and Research's (OPR) General Plan Guidelines, which recommend 45 dBA CNEL/ L_{dn} as the maximum allowable interior noise level to permit normal residential activities (OPR, 2017) (OPR was renamed the Office of Land Use and Climate Innovation as of July 2024).

Numerous studies have linked excessive noise exposure to adverse health effects, including hearing impairment and sleep disturbance (Hassan, 2024). These potential health impacts may result from both short-term exposure to very high noise levels and long-term exposure to lower, chronic noise levels. Acute exposure to sound levels greater than 120 dBA—such as those experienced at a rock concert—can cause mechanical damage to the ear and result in hearing impairment (Natarajan, 2023).

According to the World Health Organization (WHO) (Berglund et al., 1999) and the United States (U.S.) Environmental Protection Agency (USEPA) (1974), a daily average noise exposure of L_{eq} 70 dBA is considered safe for protecting against hearing loss. However, even at this level, disturbances to sleep and concentration may occur, and potential links to chronic health effects, such as hypertension and heart disease, have been identified (UTHealth School of Public Health, 2019). Research into these chronic health impacts remains ongoing, and there is currently insufficient information to evaluate the specific public health impacts of an individual project.

Accordingly, this summary acknowledges that such health effects could potentially occur; however, a definitive evaluation of public health impacts related to noise exposure from the proposed Project cannot be provided at this time.

Groundborne Vibration

Groundborne vibration is the oscillatory motion of soil relative to its equilibrium position. Like sound, vibration frequencies are measured in hertz (Hz). The amplitude of vibration is typically described either as peak particle velocity (PPV), in units of inches per second (in/sec), or as vibration velocity in decibels (VdB).

Vibration can be a serious concern for nearby neighbors when activities cause buildings to shake or produce rumbling sounds. However, vibration from sources such as buses and trucks traveling on smooth roads is rarely perceptible, even at nearby locations. Most perceptible indoor vibration is caused by sources within buildings, such as operating equipment, people moving, or doors slamming. Common outdoor sources include heavy construction equipment and activities (such as blasting and pile driving), steel-wheeled trains, and heavy trucks on rough roads.

Table 4.7-3 summarizes common sources of groundborne vibration velocity levels (measured in decibel units [VdB]) and the typical human response to vibration for a person at rest in quiet surroundings. Tolerance to vibration increases considerably during physical activity. Human response is also influenced by the duration and frequency of vibration events, with increased exposure generally resulting in decreased tolerance. Typical background vibration levels in residential areas are usually 50 VdB or lower, well below the approximate human perception threshold of 65 VdB.

Groundborne noise is a secondary effect of groundborne vibration. When a building or structure vibrates, it can radiate noise into the interior space, potentially causing rattling of windows, doors, dishes, or other objects. Low-frequency vibration can also produce groundborne noise perceived as a low rumble. Groundborne noise is quantified by the A-weighted sound level (dBA; see Table 4.7-1) inside the building and is generally 25 to 40 dBA lower than the corresponding vibration velocity level measured in VdB. For example, a groundborne vibration level of 65 VdB can produce groundborne noise levels up to 40 dBA, which may disturb sleep. A vibration level of 85 VdB can produce groundborne noise levels up to 60 dBA, which can be disruptive to daytime noise-sensitive land uses, such as schools (FTA, 2018).

Table 4.7-3. Typical Levels of Groundborne Vibration

Human or Structural Response	Vibration Decibels (VdB)	Human or Structural Response
Threshold for minor cosmetic damage to fragile buildings	100	Blasting, pile driving, vibratory compaction equipment
Difficulty with tasks such as reading a video or computer screen	90	Heavy tracked vehicles (bulldozers, cranes, drill rigs)
Threshold for residential annoyance for infrequent events (e.g., commuter rail)	80	Freight rail, typical commuter rail, upper range
	70	Rapid transit, upper range

Human or Structural Response	Vibration Decibels (VdB)	Human or Structural Response
Threshold for residential annoyance for frequent events (e.g., rapid transit)	60	Commuter rail, typical
Approximate threshold for human perception of vibration limit for vibration sensitive equipment	50	Bus or truck over bump or on rough roads. Rapid transit, typical
		Typical bus or truck on public road
		Typical background vibration

Source: FTA, 2018

4.7.1. Environmental Setting

Existing Noise Environment

To assess the existing noise environment, 24-hour noise level measurements were taken at five locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. Figure 4.7-1 provides the boundaries of the Project study area and the noise-level measurement locations. To fully describe the existing noise conditions, long-term noise level measurements were collected by Urban Crossroads on Tuesday, November 26, 2024 (Urban Crossroads, 2025). Appendix M, the Noise Impact Analysis, includes study area photos, a description of the specific measurement procedures and criteria, a description of the methodology for choosing measurement locations, as well as a summary worksheet of hourly noise levels observed during the 24-hour noise measurements.

Baseline Noise Measurements

The noise measurements presented below focus on the hourly equivalent sound levels (L_{eq}) to describe the existing ambient conditions. Table 4.7-4 provides the noise levels used to describe the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each baseline noise measurement location. The equivalent sound level (L_{eq}) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. The daytime and nighttime equivalent noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number.

Table 4.7-4. 24-Hour Ambient Noise Level Measurements

Location	Description	Equivalent Noise Level (dBA L_{eq})		CNEL
		Daytime	Nighttime	
L1	Located west of the Project site near the Staybridge Suites at 19901 Prairie Avenue	71.9	69.3	76.5
L2	Located southwest of the site near the residence at 3404 Madrona Avenue	67.6	63.8	71.4
L3	Located south of the site near Delthorne Park at 3401 Spencer Street	66.6	60.7	69.1
L4	Located southwest of the site near the residence at 20404 Osage Avenue	57.0	47.3	57.2
L5	Located south of the site near the industrial building at 320 Maple Avenue	69.1	69.3	76.0

Note: dBA = A-weighted decibels; CNEL = Community Noise Equivalent Level

Source: Urban Crossroads, 2025 (Appendix M)

Roadway Traffic Noise

The background ambient noise levels in the Project study area are dominated by the transportation-related noise associated with surface streets. This includes the auto and heavy truck activities on study area roadway segments near the noise level measurement locations. Table 4.7-5 presents the existing roadway parameters used to assess the Project's off-site dBA CNEL transportation noise impacts. Table 4.7-5 identifies the 15 off-site study area roadway segments, the distance from the centerline to adjacent land uses based on the functional roadway classifications per the City of Torrance General Plan Circulation Element, vehicle speeds, Average Daily Traffic Volumes (ADT), and existing noise levels. The ADT volumes used in this study area, which are presented in Table 4.7-5, are based on the Traffic Assessment prepared for the proposed Project (Urban Crossroads, 2025).

Figure 4.7-1. Noise-Level Measurement Locations

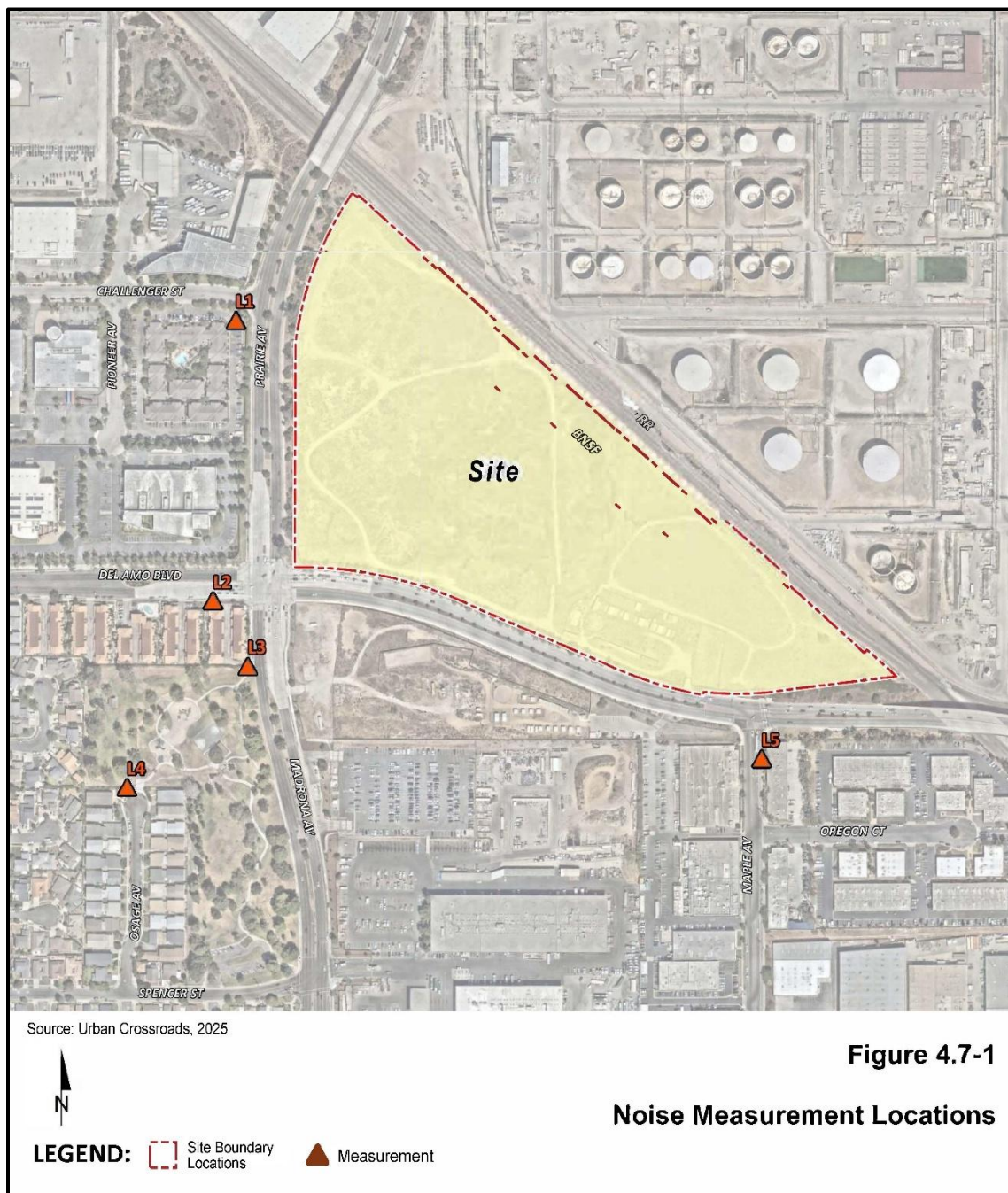


Table 4.7-5. Existing Project Vicinity Roadway Parameters and Noise Levels

ID	Roadway	Segment	Receiving Land Use	Roadway Classification	Distance from Centerline to Receiving Land Use (feet)	Vehicle Speed (mph)	ADT	CNEL
1	Hawthorne Bl.	n/o Del Amo Bl.	Sensitive	Principal ¹	67'	40	50,184	72.1
2	Prairie Av.	n/o 190th St.	Sensitive	Major ²	67'	40	34,965	68.9
3	Prairie Av.	s/o 190th St.	Non-Sensitive	Major	67'	40	44,827	69.9
4	Prairie Av.	n/o Del Amo Bl.	Non-Sensitive	Major	67'	40	43,917	70.0
5	Prairie Av.	s/o Del Amo Bl.	Sensitive	Major	67'	40	39,365	69.4
6	Crenshaw Bl.	n/o 190th St.	Sensitive	Major	67'	45	38,688	70.6
7	Crenshaw Bl.	s/o 190th St.	Non-Sensitive	Major	67'	45	43,533	71.1
8	Crenshaw Bl.	s/o Del Amo Bl.	Non-Sensitive	Major	67'	45	40,415	70.8
9	190th St.	w/o Prairie Av.	Sensitive	Major	67'	40	26,072	67.6
10	190th St.	e/o Prairie Av.	Non-Sensitive	Major	67'	40	33,413	68.7
11	190th St.	w/o Van Ness Av.	Non-Sensitive	Major	67'	45	35,350	70.2
12	Del Amo Bl.	w/o Hawthorne Bl.	Sensitive	Major	67'	40	24,217	67.3
13	Del Amo Bl.	w/o Prairie Av.	Sensitive	Major	67'	40	29,678	68.1
14	Del Amo Bl.	w/o Maple Av.	Non-Sensitive	Major	67'	40	24,193	67.3
15	Del Amo Bl.	w/o Crenshaw Bl.	Non-Sensitive	Major	67'	40	24,905	67.4

Source: Urban Crossroads, 2025 (Appendix M)

Notes: ID = identification; Bl. = Boulevard; Av. = Avenue; St. = Street; n/o = north of; s/o = south of; w/o = west of; e/o = east of; Sensitive = Sensitive noise receptors, which are locations where the presence of noise can have an adverse effect on human activity or well-being, including residences, schools, hospitals, and parks; Non-Sensitive = Non-sensitive noise receptors, which are locations that are not substantially affected by noise, such as commercial or industrial areas; ' = feet; mph = miles per hour; ADT = average daily traffic; CNEL = Community Noise Equivalent Level

1. Hawthorne Boulevard is classified as a principal arterial roadway because it serves as a critical commercial and transportation corridor for the South Bay region, connecting multiple cities and carrying a very high volume of traffic.

2. A major roadway has a significant role in the regional transportation network, with high traffic volumes and direct access to major destinations and other key arterial routes.

Noise-Sensitive Land Uses

To assess the potential for long-term operational and short-term construction noise impacts, the following noise-sensitive receiver locations, as shown in Figure 4.7-3, were identified as representative locations for analysis. The selection of receiver locations is based on Federal Highway Administration (FHWA) guidelines and is consistent with additional guidance provided by the California Department of Transportation (Caltrans) and the Federal Transit Administration (FTA).

Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, out-patient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

To describe the potential off-site Project noise levels, five receiver locations in the vicinity of the Project site were identified (as shown in Table 4.7-6 below) and correlated to the five baseline measurement locations discussed previously. Other sensitive land uses in the Project study area that are located at greater distances than those identified in this noise analysis would experience lower noise levels than those presented in this section due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the Project boundary to each receiver location.

Table 4.7-6. Noise-Sensitive Land Uses in the Project Vicinity

Receptor	Description	24-Hour Noise Measurement Location
R1	Staybridge Suites at 20403 Osage Avenue, approximately 202 feet west of the Project site. R1 is placed at the building façade.	L1
R2	Existing multi-family residential home at 3402 Del Amo Boulevard, approximately 203 feet southwest of the Project site. Receiver R2 is placed at the building façade.	L2
R3	Delthorne Park, approximately 475 feet southwest of the Project site. Receiver R3 is placed at the park boundary.	L3
R4	Existing multi-family residential home at 20404 Osage Avenue, approximately 801 feet southwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R4 is placed at the residential building façade.	L4
R5	Life Covenant Church at 308 Maple Avenue, approximately 159 feet south of the Project site. R5 is placed at the building façade.	L5

Source: Urban Crossroads, 2025 (Appendix M)

Figure 4.7-2. Noise-Sensitive Receptor Locations



4.7.2. Applicable Regulations, Policies, and Standards

4.7.2.1. Noise

Federal

Federal Interagency Committee on Noise

The Federal Interagency Committee on Noise (FICON) established guidance in its 1992 report, *Federal Agency Review of Selected Airport Noise Analysis Issues*, for evaluating the significance of increases in environmental noise levels. While originally developed for assessing aircraft-related noise impacts, the FICON thresholds are broadly applied in environmental noise assessments for various project types. The guidance identifies three levels of noise increase—5 dBA (readily perceptible), 3 dBA (barely perceptible), and 1.5 dBA—depending on existing ambient conditions and land use sensitivity. These thresholds are widely used to evaluate whether a permanent increase in baseline noise constitutes a significant impact. The FICON guidance does not constitute a regulatory standard but serves as a commonly accepted reference for assessing noise level changes under CEQA and the National Environmental Policy Act (NEPA) and aligns with methodologies recommended by agencies such as the FHWA and Caltrans.

State

California Government Code Title 7, Division 1, Chapter 3, section 65302, encourages each local government entity to implement a noise element as part of its general plan. In addition, the California Governor's Office of Planning and Research (OPR, now called the Office of Land Use and Climate Innovation) has developed guidelines for preparing noise elements, which include recommendations for evaluating the compatibility of various land uses as a function of community noise exposure. According to the State, an exterior noise environment up to 60 dBA CNEL and 65 dBA CNEL is "normally acceptable" for single- and multi-family residential uses, respectively, without special noise insulation requirements. In addition, noise levels up to 75 dBA CNEL are "conditionally acceptable" with special noise insulation requirements, while noise levels at 75 dBA CNEL and above are "clearly unacceptable" for residential uses. These guidelines apply to noise sources such as vehicular traffic, aircraft, and rail movements. The City of Torrance has developed land use compatibility guidelines that are described under local regulations.

California Code of Regulations (CCR)

California Code of Regulations (CCR) Title 24 establishes the California Building Code (CBC). The most recent building standard adopted by the legislature that will be used throughout the State is the 2022 version, which took effect on January 1, 2023. The State of California's noise insulation standards are codified in the CBC. These noise standards are for new construction in California for the purposes of interior compatibility with exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residences, schools, or hospitals, are near major transportation noises, and where such noise sources create an exterior noise level of 60 dBA CNEL, or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

Local

City of Torrance General Plan – Noise Element

The Noise Element of the City of Torrance General Plan includes goals and policies that aim to minimize adverse noise impacts and to preserve a high quality of life for City residents. Torrance will maintain a peaceful environment by identifying noise impacts and mitigating noise problems through acoustical

treatments and appropriate land use policies (City of Torrance, 2010). To protect City residents from excessive noise levels, the Noise Element contains the following four objectives:

- N. 1 – To identify noise pollution and establish effective noise abatement methods
- N. 2 – To minimize transportation-related noise impacts
- N. 3 – To minimize noise incompatibilities between land uses
- N. 4 – To research and implement new means of noise abatement

The noise policies specified in the Noise Element provide the guidelines necessary to satisfy these objectives. The noise criteria identified in the Noise Element (Table N-3) are guidelines to evaluate the land use compatibility of transportation-related noise. The compatibility criteria shown in Table 4.7-7 provide the City with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels. The Noise/Land Use Compatibility Guidelines indicate that the maximum exterior noise level standard for industrial land uses, such as the Project, is 75 dBA CNEL.

Table 4.7-7. Torrance Noise/Land Use Compatibility Guidelines

Property Receiving Noise		Maximum Noise Level Ldn or CNEL (dBA)	
Type of Use	Land Use Designations	Interior	Exterior
Residential ³	Low Density Residential		
	Low Medium Density Residential	45	60/65 ¹
	Medium Density Residential		
	Medium High Density Residential	45	65/70 ²
	High Density Residential	45	70 ¹
Commercial and Office	General Commercial	--	
	Commercial Center		
	Residential Office	50	
Industrial	Business Park		
	Light Industrial	55	75
	Heavy Industrial		
Public and Medical Uses	Public/Quasi-Public/Open Space	50	65
	Hospital/Medical	50	70
Airport	Airport	--	70

Notes: Ldn = Day-Night Average Sound Level; CNEL = Community Noise Equivalent Level; dBA = A-weighted decibels

1. The normally acceptable standard is 60 dBA. The higher standard is acceptable subject to inclusion of noise-reduction features in project design and construction.

2. Maximum exterior noise levels up to 70 dB CNEL are allowed for Multi-Family Housing.

3. Regarding aircraft-related noise, the maximum acceptable exposure for new residential development is 60 dBA CNEL.

Source: City of Torrance, 2010

Torrance Municipal Code (TMC)

To control noise impacts associated with construction, the City has established limits to the hours of construction activities in Section 46.3.1[a] of the TMC. Per Section 46.3.1[a], construction activities are permitted within the hours of 7:30 a.m. to 6:00 p.m. on Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday; with no activity allowed on Sunday and holidays (Urban Crossroads, 2025). In addition, the TMC identifies an exterior construction noise level limit of 50 dBA Leq for all other time periods outside the permitted hours. Section 46.3.1[b] indicates that the Community Development Director may allow

expanded hours and days of construction if unusual circumstances and conditions exist. Such requests must be made in writing and must receive approval by the Director prior to any expansion of the hour and day restrictions listed.

For the purposes of regulating operational noise, the TMC at Chapter 6, Noise Regulation, Article 7, Section 46.7.2, divides the City into four “Noise Regions.” The Project site is in Noise Region 1 as shown on Figure N-5 of City of Torrance General Plan and Article 7 Exhibit A of the TMC. TMC Section 46.7.2[b] establishes exterior noise level standards for the noise-sensitive residential land uses within 500 feet of the City’s Noise Region 1 boundaries. In this context, and for the purposes of this analysis, the TMC standards presented in Table 4.7-8 are employed in evaluation of noise levels that would be received at the nearest noise-sensitive residential land uses located within Region 4. A further description of these regions and the specific regulations governing each region can be found in Appendix M, the Noise Impact Analysis prepared by Urban Crossroads (2025).

Table 4.7-8. Operational Noise Level Standards

Jurisdiction	Land Use	Time Period	Noise Level Standard (dBA L_{eq})
City of Torrance	Residential	Daytime (7:00 a.m.–10:00 p.m.)	55
		Nighttime (10:00 p.m.–7:00 a.m.)	50

Note: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level

Source: Torrance Municipal Code, Article 7, Section 46.7.2[a][2]

4.7.2.2. Vibrations

Federal

Federal Transit Administration

The FTA has adopted vibration criteria for assessment of vibrations from construction and operational activities, both for human perception and damage to structures (FTA, 2018). The criteria are summarized in Table 4.7-9 and Table 4.7-10.

Table 4.7-9. FTA Construction Vibration Damage Criteria

Building Category/Structural Category	Vibration Criteria (PPV, in/sec)	Vibration Criteria (VdB re 1 μ in/sec rms)
I. Reinforced concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Note: PPV = peak particle velocity; in/sec = inches per second; VdB re 1 μ in/sec rms = Vibration decibels referenced to one micro-inch per second root mean square

Source: FTA, 2018

Table 4.7-10. FTA Indoor Ground-Borne Vibration Impact Criteria for General Vibration Assessment

Land Use Category	Ground-Borne Vibration Impact Levels (VdB re 1 μ in/sec rms)		
	Frequent Events ¹	Occasional Events ²	Infrequent Events ³
Category 1: Buildings where vibration would interfere with interior operations	65 VdB ⁴	65 VdB ⁴	65 VdB ⁴
Category 2: Residences and buildings where people normally sleep	72 VdB	75 VdB	80 VdB

Land Use Category	Ground-Borne Vibration Impact Levels (VdB re 1 μ in/sec rms)		
	Frequent Events ¹	Occasional Events ²	Infrequent Events ³
Category 3: Institutional land uses with primarily daytime use	75 VdB	78 VdB	83 VdB

Notes: VdB re 1 μ in/sec rms = Vibration decibels referenced to one micro-inch per second root mean square; Vdb = Vibration decibels

1. More than 70 events per day

2. 30 to 70 events per day

3. Fewer than 30 events per day

4. From FTA, 2018: "This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes."

Source: FTA, 2018

State

Caltrans

Caltrans has developed vibration criteria based on potential structural damage risks and human annoyance. Caltrans-recommended criteria for the evaluation of groundborne vibration levels, with regard to structural damage and human annoyance, are summarized in Table 4.7-11. The criteria apply to continuous vibration sources, which include vehicle traffic and most construction activities. All damage criteria for buildings are in terms of ground motion at the buildings' foundations. No allowance is included for the amplifying effects of structural components (Caltrans, 2020b). As shown in Table 4.7-11, the thresholds for determining whether structural damage could occur as a result of construction activities are 0.25 inches per sec (in/sec) PPV for historic structures, 0.3 in/sec PPV for older residential structures, and 0.5 in/sec PPV for newer structures. Groundborne vibration levels of 0.2 in/sec PPV may result in increased levels of annoyance for people in buildings (Caltrans, 2020b).

Table 4.7-11. Caltrans Threshold Criteria for Construction Activities

Potential Impact	Groundborne Vibration Thresholds (PPV, in/sec)
Structural Damage Risk	
Extremely fragile historic buildings, ruins, ancient monuments	0.08
Fragile buildings	0.1
Historic and some old buildings	0.25
Older residential structures	0.3
New residential structures	0.5
Modern industrial/commercial buildings	0.5
Human Response	
Barely perceptible	0.01
Distinctly perceptible	0.04
Strongly perceptible Level may begin to annoy people in outdoor areas	0.1
Level may begin to annoy people in buildings	0.2
Severe	0.4

Notes: PPV = peak particle velocity; in/sec = inches per second

The vibration levels are based on peak particle velocity in the vertical direction for continuous or frequent intermittent vibration sources including impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans, 2020b

4.7.3. Environmental Impacts Analysis and Mitigation

4.7.3.1. Impact Analysis Approach

The following section outlines the methods and procedures used to estimate and analyze the future traffic noise environment. Consistent with the Noise/Land Use Compatibility Guidelines, all transportation-related noise levels are presented in terms of the 24-hour CNEL's. Unlike a simple arithmetic average noise level, CNEL represents the logarithmic summation of the equivalent hourly noise levels with evening and nighttime noise penalties recognizing that noise may have different impacts on people depending on when it occurs.

FHWA Traffic Noise Prediction Model

The expected roadway noise level increases from vehicular traffic were calculated by Urban Crossroads using a computer program that replicates the FHWA Traffic Noise Prediction Model, FHWA-RD-77-108 (Urban Crossroads, 2025). The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). REMEL represents the maximum sound level (L_{max}) of individual vehicle "pass by" events by vehicle type when measured at a "reference distance" of 50 feet from the center of the travel lane.

In California, the national REMELs are substituted with the California Vehicle Noise (Calveno) Emission Levels (Urban Crossroads, 2025). Adjustments are then made to the REMEL to account for: the roadway classification (e.g., collector, secondary, major or arterial), the roadway active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway), the total ADT, the travel speed, the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume, the roadway grade, the angle of view (e.g., whether the roadway view is blocked), the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping), and the percentage of total ADT which flows each hour throughout a 24-hour period. Research conducted by Caltrans (2020a) has shown that the use of soft site conditions is appropriate for the application of the FHWA traffic noise prediction model used in this analysis. This research can be found in the *Traffic Noise Attenuation as a Function of Ground and Vegetation Final Report* prepared by Caltrans in June 1995 (pp. 30–31) (Urban Crossroads, 2025).

Off-Site Traffic Noise Prediction Model Inputs

As noted in Section 4.7.1, Table 4.7-5 presents the roadway parameters used to evaluate the Project's off-site transportation noise impacts in terms of dBA CNEL. The table identifies 15 off-site roadway segments within the study area, including the distance from the roadway centerline to adjacent land uses, as determined by the functional roadway classifications provided in the City of Torrance General Plan – Circulation Element. Vehicle speeds and ADT volumes for each segment are also presented. The ADT volumes used in this analysis were calculated using trip generation rates from the Institute of Transportation Engineers' *Trip Generation Manual* (Institute of Transportation Engineers, 2021), as discussed in Section 4.8, Transportation:

- Existing Without Project (E)
- Existing With Project (EP)
- Existing plus Ambient plus Cumulative (EAC) (2027) Without Project
- Existing plus Ambient plus Cumulative plus Project (EAPC) (2027)

ADT volumes vary by roadway segment and reflect a combination of existing traffic volumes and Project-related traffic distributions. This noise analysis evaluates off-site traffic noise impacts through a comparative assessment of conditions at the boundary of the right-of-way (ROW) of adjacent land uses, using both the "without Project" and "with Project" ADT volumes. Consistent with Section 4.8, Table 4.8-3, Project

Generated Traffic, the Project is expected to generate a net increase of approximately 2,424 two-way daily trips, including 100 truck trips.

To quantify off-site traffic noise levels, Project-generated truck trips were incorporated into the heavy truck category within the FHWA Traffic Noise Model. This method accounts for the fact that the FHWA model is particularly sensitive to the proportion of heavy trucks in the overall vehicle mix. The inclusion of Project-related truck trips increased the heavy truck percentage, thereby influencing the predicted noise levels. Table 4.7-12 presents the distribution of vehicle trips by time of day (daytime, evening, and nighttime). Using this distribution, the number of additional Project truck trips and calculated revised vehicle mix percentages for each segment were determined, which were then used as inputs to the FHWA noise model.

Table 4.7-12. Time Of Day Vehicle Splits

Time of Day	Vehicle Mix			Time of Day Split
	Autos	Medium Trucks	Heavy Trucks	
Daytime	77.79%	1.16%	0.31%	79.27%
Evening	11.20%	0.05%	0.03%	11.28%
Nighttime	9.24%	0.12%	0.10%	9.46%
Daily	98.23%	1.34%	0.43%	100.00%

Notes: % = percent

Vehicle Mix – The vehicle mix is based on a May 15, 2024, 24-hour directional vehicle classification count collected on Prairie Avenue north of Del Amo Boulevard (Urban Crossroads, 2025)

Autos – These vehicles have two axles and four wheels designed primarily for the transportation of nine or fewer passengers (automobiles) or transportation of cargo (light trucks).

Medium Trucks – These vehicles have two axles and six wheels designed for transportation of cargo.

Heavy Trucks – These vehicles have three or more axles designed for the transportation of cargo.

Source: Urban Crossroads, 2025

4.7.3.2. Significance Criteria

Project impacts related to noise were evaluated against the CEQA significance criteria and are discussed in the following sections. The impact analysis evaluates potential proposed Project impacts during the construction phase and the operation and maintenance phase. The significance criteria listed below are based on Appendix G of the CEQA Guidelines.

Would the proposed Project:

- NOI-1: Generate a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- NOI-2: Generate excessive groundborne vibration or groundborne noise levels?
- NOI-3: Be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or private-use airport, that exposes people residing or working in the project area to excessive noise levels?

Quantitative thresholds for each of these significance criteria are discussed in the following sections.

Threshold NOI-1 (Noise Level Increases)

Noise level increases resulting from the Project are evaluated based on the Appendix G thresholds of the CEQA Guidelines. Under CEQA, the determination of a significant adverse environmental impact from noise must consider the magnitude of the increase, the existing baseline ambient noise levels, and the proximity and sensitivity of affected receptors. This approach acknowledges that no single level of noise

increase automatically constitutes a significant impact, primarily due to wide variations in individual noise tolerance and personal experiences with noise (Urban Crossroads, 2025). Generally, the greater the increase above the existing ambient noise level, the more likely the new noise condition will be perceived as objectionable. A key factor in assessing the subjective response to a new noise source is the comparison to the pre-existing or ambient acoustic environment, the level to which individuals have become accustomed. Ambient noise is the composite level of all ongoing sound sources, excluding the specific noise being evaluated, and it represents the typical or existing environmental noise conditions at a given location during a particular time of day or night.

Transportation Noise (Substantial Permanent Noise Level Increase)

As discussed in Section 4.7.2 above, FICON developed guidance for assessing project-generated noise level increases in relation to existing ambient noise conditions (Urban Crossroads, 2025). Although originally intended for evaluating aircraft noise impacts, the FICON recommendations are widely applied in broader environmental noise assessments. These recommendations are based on research linking aircraft noise levels to the percentage of individuals who report being highly annoyed. While aircraft-specific, the FICON thresholds are frequently used in evaluating cumulative noise exposure metrics, such as the CNEL and L_{eq} , due to their relevance in gauging community annoyance and sensitivity to noise increases.

As previously noted, this noise analysis is based on the principle that no single noise increase universally constitutes a significant impact. This approach is supported by the 2008 California Court of Appeal decision in *Gray v. County of Madera* (Urban Crossroads, 2025). For instance, in quiet environments where ambient noise levels are below 60 dBA, the introduction of a new noise source that causes a substantial increase may result in a significant impact, particularly if applicable noise thresholds are exceeded. Accordingly, this analysis considers a project-related noise level increase of 5 dBA or more to be significant when the existing (without project) noise levels are below 60 dBA.

In accordance with FICON guidance, in areas where the existing noise levels range between 60 and 65 dBA, a 3 dBA increase—generally considered barely perceptible—may be appropriate as a threshold for significance. For areas where the existing noise levels exceed 65 dBA, any project-related increase of 1.5 dBA or more is considered significant if it contributes to an exceedance of the applicable noise criteria for a given land use, as it would likely exacerbate an already elevated noise exposure. These thresholds reflect typical community responses to noise and are consistent with methodologies recommended by both the FHWA and Caltrans for evaluating noise impacts at sensitive receptor locations (Urban Crossroads, 2025).

Non-Transportation Noise (Substantial Permanent Noise Level Increase)

The City of Torrance General Plan – Noise Element, specifically Table N-3 (Torrance Noise/Land Use Compatibility Guidelines), was used to establish acceptable noise thresholds for non-noise-sensitive land uses within the Project study area. As shown previously in Table 4.7-7, the maximum acceptable exterior noise level is 70 dBA CNEL for commercial and office uses, and 75 dBA CNEL for industrial uses. To evaluate the significance of Project-related traffic noise increases at off-site non-noise-sensitive land uses, a threshold of 3 dBA—representing a barely perceptible change—is applied (Urban Crossroads, 2025). When existing (without Project) noise levels already exceed the applicable compatibility criteria (e.g., 70 dBA CNEL), any additional increase of 3 dBA or more is considered a significant impact, as it would further exceed already non-compliant conditions.

Construction Noise (Substantial Temporary Noise Level Increase)

To assess noise impacts from construction activities, temporary increases above existing ambient conditions are evaluated under CEQA Significance Threshold NOI-1. In California, a substantial temporary noise increase is defined as a Project-generated noise level that exceeds the existing ambient level by 12 dBA or more (Urban Crossroads, 2025). This 12 dBA threshold is rooted in long-established precedent and is based on the principle that a 10 dBA increase is generally perceived by the human ear as a doubling of

loudness. Accordingly, if Project-related construction activities result in a temporary noise level increase of 12 dBA L_{eq} or more above the ambient condition, the impact is considered potentially significant under CEQA.

Furthermore, while the City establishes limits to the hours during which construction activity may take place, neither the City's General Plan nor TMC establish numeric maximum acceptable construction source noise levels at potentially affected receivers during the permitted construction hours. Therefore, a numerical construction threshold based on FTA's *Transit Noise and Vibration Impact Assessment Manual* is used for analysis of daytime construction impacts, as discussed below. According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for noise-sensitive residential land uses (Urban Crossroads, 2025).

Threshold NOI-2 (Vibration)

Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration (Urban Crossroads, 2025).

To evaluate potential vibration impacts associated with construction and operation of the Del Amo Technology Center, vibration-generating activities are typically assessed against standards set forth in a local jurisdiction's municipal code, if available. However, the City of Torrance does not specify quantitative vibration level thresholds. Therefore, this analysis relies on guidance from Caltrans' *Transportation and Construction Vibration Guidance Manual* (2020b), specifically Table 19 on page 38, which outlines vibration damage thresholds for various building types. Based on this guidance, the maximum acceptable continuous vibration threshold applicable to older residential structures is 0.3 in/sec PPV. This threshold is used to assess the potential for construction-related vibration damage at adjacent properties.

Threshold NOI-3 (Public or Private Airports)

CEQA Noise Threshold NOI-3 applies to projects located near public or private airports and focuses on land use compatibility in relation to airport-related noise exposure. The Project site is not located within two miles of an airport or airstrip. The nearest facility, Torrance Municipal Airport, is approximately 2.5 miles south of the Project site. As a result, the Project site would not be exposed to excessive noise levels from airport operations. Therefore, impacts under CEQA Noise Threshold NOI-3 are considered less than significant, and no further analysis is required pursuant to Appendix G of the CEQA Guidelines.

Significance Criteria Summary

Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed development. Table 4.7-13 shows the significance criteria summary matrix that includes the allowable criteria used to identify potentially significant incremental noise level increases.

Table 4.7-13. Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site	Noise-Sensitive	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is 60–65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
	Non-Noise-Sensitive	If ambient is > 70 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	Noise-Sensitive	See Table 4.7-8	55 dBA L _{eq}	50 dBA L _{eq}
		If ambient is < 60 dBA L _{eq}	≥ 5 dBA L _{eq} Project increase	
		If ambient is 60–65 dBA L _{eq}	≥ 3 dBA L _{eq} Project increase	
		If ambient is < 65 dBA L _{eq}	≥ 1.5 dBA L _{eq} Project increase	
		Permitted hours of 7:30 a.m. to 6:00 p.m. on weekdays, 9:00 a.m. to 5:00 p.m. on Saturday with no activity on Sunday and federal holidays		
Construction	Noise-Sensitive	Noise Level Threshold	80 dBA L _{eq}	50 dBA L _{eq}
		Exterior Noise Level Increase	12 dBA L _{eq}	
		Vibration Level Threshold	0.3 PPV (in/sec)	

Notes: < = greater than; < = less than; ≥ = greater than or equal to; dBA = A-weighted decibels; CNEL = Community Noise Equivalent Level; L_{eq} = equivalent continuous sound level; PPV = peak particle velocity; in/sec = inches per second

Source: Urban Crossroads, 2025 (Appendix M)

4.7.3.3. Environmental Impact Analysis

As described in Section 2, Project Description, the proposed Project would include developing a Class A industrial warehouse building, including 15,000 square feet of office space on 31.3 acres of currently vacant land. The proposed building would include 56 dock doors on the northeastern portion of the building. The proposed Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. The proposed Project also includes future road improvements (including installation of a sewer line) along Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court, totaling an additional 7.79 acres.

There are two primary categories of noise impacts that would occur as a result of the proposed Project. The first category would be impacts associated with Project construction, including the use of construction equipment on the Project site, and off-site construction traffic on roadways providing access to the Project site. During construction activities, a number of vehicles would be traveling to and from the Project site, including trucks delivering materials to the Project site, trucks transporting waste material away from the site, and construction workers' vehicles commuting to and from the Project site.

The second category of noise impacts would be the impacts associated with operation and maintenance of the proposed Project after construction is complete. Since the future occupants of the building are currently unknown, the analysis will evaluate both Option 1 – Single Tenant Building and Option 2 – Multi-Tenant Building.

Impact NOI-1: Expose persons to or generate temporary or permanent noise levels in excess of established standards.

Construction

LESS THAN SIGNIFICANT. This section evaluates the potential short-term noise impacts associated with construction activities required for the development of the Project. Figure 4.7-4, Operational Noise Source

Locations, shows the locations of primary construction noise sources relative to the nearest noise-sensitive receptors, as previously identified in Section 4.7.1. Pursuant to Section 46.3.1[a] of the TMC, construction activities are permitted between the hours of 7:30 a.m. and 6:00 p.m., Monday through Friday, and from 9:00 a.m. to 5:00 p.m. on Saturday. Construction is prohibited on Sunday and legal holidays. In addition to on-site construction equipment, off-site construction-related trips would generate temporary noise throughout the construction period. These trips would be associated with the transport of construction workers and the delivery of building materials, supplies, and concrete to the Project site.

Onsite Construction Noise Impacts

The FTA's *Transit Noise and Vibration Impact Assessment Manual* acknowledges that construction projects typically occur in multiple stages, each with a distinct mix of equipment and corresponding noise characteristics. The manual outlines procedures for evaluating noise impacts during construction, recognizing that the intensity and nature of noise can vary considerably depending on the type and duration of activities performed at each stage. Some phases may produce higher continuous noise levels due to sustained equipment use, while others may generate elevated impact noise levels from intermittent, high-intensity operations. Construction activities for the Project are anticipated to occur in the following stages:

- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

To describe construction noise activities, this construction noise analysis was prepared using reference construction equipment noise levels from the FHWA-published Roadway Construction Noise Model (RCNM), which includes a national database of construction equipment reference noise emission levels (Urban Crossroads, 2025). The RCNM equipment database provides a comprehensive list of the noise generating characteristics for specific types of construction equipment. In addition, the database provides an acoustical usage factor to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. Consistent with FTA guidance for detailed construction noise assessment, Table 4.7-14 presents the combined noise levels for the loudest construction activities expected for each stage, assuming all equipment operates at the same time.

Construction activities are best evaluated as mobile sources since these activities tend to vary considerably, not only as the speed and power of the equipment varies, but also as the equipment constantly changes in terms of its distance from the receivers and its relative location (Urban Crossroads, 2025). Construction projects involve various stages, and activities frequently shift from one location to another. For example, during the initial stages, noise-generating activities might concentrate in one area, and then move to another section as construction progresses. Using the reference RCNM construction equipment noise levels and the Computer Aided Noise Abatement (CadnaA) noise prediction model, calculations of Project construction noise level impacts at nearby sensitive receiver locations were completed. To account for the dynamic nature of construction activities, the CadnaA construction noise analysis evaluates the noise source activities as multiple moving point sources or work crews within the limits of construction for each stage of construction activity. Construction impacts are based on the highest noise level calculated at each receiver location. Table 4.7-15 shows that the construction noise levels are expected to range from 60.4 to 66.7 dBA L_{eq} at the nearby receiver locations. Appendix M, the Noise Impact Analysis prepared by Urban Crossroads (2025) includes the detailed CadnaA construction noise model inputs.

Figure 4.7-3. Construction Noise Source Locations

Source: Urban Crossroads, 2025.

**LEGEND:**

Construction Activity
 Receiver Locations

Distance from receiver to Project site boundary (in feet)

Figure 4.7-3**Construction Noise Source Locations**

Table 4.7-14. Construction Reference Noise Levels

Construction Stage	Reference Construction Equipment	Reference Noise Level at 50 Feet (dBA L _{eq})	Composite Reference Noise Level (dBA L _{eq})
Demolition	Concrete Saw	83	86.8
	Grapple (on backhoe)	83	
	Gradall	79	
Site Preparation	Tractor	80	84.0
	Backhoe	74	
	Grader	81	
	Scraper	80	
Grading	Excavator	77	83.3
	Dozer	78	
	Crane	73	
Building Construction	Generator	78	80.6
	Front End Loader	75	
	Paver	74	
Paving	Dump Truck	72	77.8
	Roller	73	
	Man Lift	68	
Architectural Coating	Compressor (air)	74	76.2
	Generator (<25kVA)	70	

Notes: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; <25kVA = less than 25 kilovolt-amps

Composite Reference Noise Level – This level represents the combined noise level for all equipment assuming they operate at the same time.

Reference Power Level – This level is the total amount of acoustical energy produced by a sound source independent of distance or surroundings.

Source: FHWA RCNM (Urban Crossroads, 2025 [Appendix M])

Table 4.7-15. Construction Equipment Noise Level Summary

Receiver Location	Typical Construction Noise Levels (dBA L _{eq} [8hr])						Highest Levels
	Demolition	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	
R1	66.6	66.6	63.1	60.4	57.7	56.0	66.6
R2	65.1	65.1	61.6	58.9	56.2	54.5	65.1
R3	63.0	63.0	59.5	56.8	54.1	52.4	63.0
R4	60.4	60.4	56.9	54.2	51.5	49.8	60.4
R5	66.7	66.7	63.2	60.5	57.8	56.1	66.7

Notes: dBA = A-weighted decibels; L_{eq}(8hr) = equivalent continuous sound level over an 8-hour period

Receiver Location – Construction noise source and noise-sensitive receptor locations are shown on Figures 4.7-2 and 4.7-3.

Highest Levels – Construction noise level calculations are based on the distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. Computer Aided Noise Abatement (CadnaA) typical construction noise model calculations are included in Appendix M.

Source: Urban Crossroads, 2025 (Appendix M)

To evaluate whether the Project would generate potentially significant short-term noise levels at nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA L_{eq} is used as a reasonable threshold to assess the daytime construction noise level impacts, as shown in Table 4.7-16.

Table 4.7-16. Project Site Construction Noise Level Compliance

Receiver Location	Construction Noise Levels (dBA Leq)		
	Highest Construction Noise Levels	Noise Threshold	Threshold Exceeded?
R1	66.6	80	No
R2	65.1	80	No
R3	63.0	80	No
R4	60.4	80	No
R5	66.7	80	No

Notes: dBA = A-weighted decibels; Leq = equivalent continuous sound level

Receiver Location – Construction noise source and receiver locations are shown on Figure 4.7-3.

Construction Noise Levels – The highest construction noise level calculations are based on the distance from the construction noise source activity to the nearest receiver locations as shown in Table 4.7-15.

Noise Threshold – Construction noise level thresholds are shown in Table 4.7-13.

Source: Urban Crossroads, 2025 (Appendix M)

The construction noise analysis shows that the nearest receiver locations would satisfy the reasonable daytime 80 dBA Leq significance threshold during Project construction activities as shown in Table 4.7-16.

It is important to note that the original Noise Technical Report prepared for the Project did not evaluate the proposed remediation phase, as this activity was not included in the original Project scope (Urban Crossroads, 2025). To assess potential impacts from this additional phase, a spreadsheet-based calculation was conducted for this EIR. Based on the combination of equipment expected to be used during remediation activities (including a large drill rig with auger, tractor, backhoe, compactor, paver, and dump truck), noise levels at the nearest receptor are estimated to range from approximately 73 to 75 dBA Leq.

Because RCNM does not differentiate between auger sizes for drill rigs, the analysis applied the standard reference noise level of 85 dBA at 50 feet for a drill rig/auger, as reported in FTA and FHWA equipment databases. To provide a conservative check, a higher reference level of 90 dBA at 50 feet was also modeled. These assumptions produce a range of predicted noise levels at the nearest receptor (R5), consistent with typical methodologies used in construction noise evaluations. Therefore, the noise impacts due to Project construction noise are considered less than significant at all receiver locations.

Offsite Traffic Noise Impacts

LESS THAN SIGNIFICANT. To assess the off-site transportation CNEL noise level associated with the development of the proposed Project, noise contours were developed based on the trip generation rates from the Institute of Transportation Engineers' *Trip Generation Manual* (Institute of Transportation Engineers, 2021), as discussed in Section 4.8, Transportation.

Noise contours were developed to evaluate the Project's incremental 24-hour traffic-related noise impacts, expressed in dBA CNEL, at land uses adjacent to roadways affected by Project-generated traffic. These contours represent distances from the roadway centerline to the 70, 65, and 60 dBA CNEL thresholds and reflect the propagation of vehicle noise under modeled traffic conditions. The contours do not account for the presence of existing noise barriers, structures, or topographic features that may attenuate ambient noise levels. As such, they provide a conservative estimate of potential noise exposure at the ROW boundary of adjacent land uses. Because the contours are based solely on vehicular traffic noise, they do not reflect contributions from nearby stationary sources within the Project study area. Table 4.7-17 summarizes exterior CNEL traffic noise levels under each analyzed traffic condition, while supporting noise contour data and calculations are provided in Appendix M, the Noise Impact Analysis prepared by Urban Crossroads (2025).

An analysis of existing traffic noise levels plus traffic noise generated by the proposed Project has been included in this report for informational purposes and to fully analyze all the existing traffic scenarios identified in the Noise Impact Analysis prepared by Urban Crossroads (2025). However, the analysis of existing off-site traffic noise levels plus traffic noise generated by the proposed Project scenario would not actually occur since the Project would not be fully constructed and operational until Year 2027 conditions. Table 4.7-18 shows the Existing without Project conditions CNEL noise levels. The Existing without Project exterior noise levels range from 67.3 to 72.1 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 4.7-17 shows the Existing with Project (Single Tenant) conditions ranging from 67.3 to 72.1 dBA CNEL, and the Existing with Project (Two Tenant) conditions ranging from 67.3 to 72.1 dBA CNEL. Table 4.7-18 shows that the Existing with Project (Single Tenant) off-site traffic noise level increases would range from 0.0 to 0.7 dBA CNEL on the study area roadway segments. The Existing with Project (Two Tenant) increase would range from 0.0 to 0.7 dBA CNEL.

Table 4.7-17. Off-Site Traffic Noise Levels

ID	Roadway	Segment	CNEL at Receiving Land Use (dBA)					
			Existing Without Project	Existing With Project (Single Tenant)	Existing With Project (Two Tenant)	EAC No Project	EAC With Project (Single Tenant)	EAC With Project (Two Tenant)
1	Hawthorne Bl.	n/o Del Amo Bl.	72.1	72.1	72.1	72.2	72.2	72.2
2	Prairie Av.	n/o 190th St.	68.9	68.9	68.9	68.9	69.0	69.0
3	Prairie Av.	s/o 190th St.	69.9	70.0	70.1	70.0	70.1	70.1
4	Prairie Av.	n/o Del Amo Bl.	70.0	70.1	70.2	70.1	70.2	70.2
5	Prairie Av.	s/o Del Amo Bl.	69.4	69.4	69.4	69.4	69.5	69.5
6	Crenshaw Bl.	n/o 190th St.	70.6	70.8	70.8	70.8	71.0	71.0
7	Crenshaw Bl.	s/o 190th St.	71.1	71.4	71.4	71.2	71.6	71.6
8	Crenshaw Bl.	s/o Del Amo Bl.	70.8	70.8	70.8	70.9	71.0	71.0
9	190th St.	w/o Prairie Av.	67.6	67.6	67.6	67.7	67.8	67.8
10	190th St.	e/o Prairie Av.	68.7	68.7	68.7	68.8	68.8	68.9
11	190th St.	w/o Van Ness Av.	70.2	70.4	70.4	70.4	70.7	70.6
12	Del Amo Bl.	w/o Hawthorne Bl.	67.3	67.3	67.3	67.4	67.4	67.4
13	Del Amo Bl.	w/o Prairie Av.	68.1	68.2	68.2	68.3	68.3	68.3
14	Del Amo Bl.	w/o Maple Av.	67.3	68.0	68.0	67.4	68.2	68.1
15	Del Amo Bl.	w/o Crenshaw Bl.	67.4	68.1	68.1	67.5	68.3	68.2

Source: Urban Crossroads, 2025 (Appendix M)

Notes: CNEL = Community Noise Equivalent Level; dBA = A-weighted decibels; ID = identification; EAC = Existing plus Ambient plus Cumulative; Bl. = Boulevard; Av. = Avenue; St. = Street; n/o = north of; s/o = south of; w/o = west of; e/o = east of

CNEL at Receiving Land Use – CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

Based on the significance criteria for off-site traffic noise presented in Table 4.7-13, land uses adjacent to the study area roadway segments would experience less than significant noise level increases on receiving land uses due to Project-related traffic.

Table 4.7-18 shows that the EAC (2027) with Project (Single Tenant) off-site traffic noise level increases would range from 0.0 to 0.8 dBA CNEL on the study area roadway segments. The EAC (2027) with Project (Two Tenant) increase would range from 0.0 to 0.7 dBA CNEL. Table 4.7-19 shows the EAC (2027) without Project conditions CNEL noise levels. The EAC (2027) without Project exterior noise levels range from 67.4 to 72.2 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 4.7-19 shows the EAC (2027) with Project (Single Tenant) conditions ranging from 67.4 to 72.2 dBA CNEL, and the EAC (2027) with Project (Two Tenant) conditions ranging from 67.4 to 72.2 dBA CNEL.

Table 4.7-18. Existing Off-Site Traffic Noise Level Increases

ID	Roadway	Segment	Receiving Land Use	CNEL at Receiving Land Use (dBA)			Incremental Noise Level Increase		Increase Threshold	
				Existing Without Project	Existing With Project (Single Tenant)	Existing With Project (Two Tenant)	Existing With Project (Single Tenant)	Existing With Project (Two Tenant)	Limit	Exceeded?
1	Hawthorne Bl.	n/o Del Amo Bl.	Sensitive	72.1	72.1	72.1	0.0	0.0	1.5	No
2	Prairie Av.	n/o 190th St.	Sensitive	68.9	68.9	68.9	0.0	0.0	1.5	No
3	Prairie Av.	s/o 190th St.	Sensitive	69.9	70.0	70.1	0.1	0.2	1.5	No
4	Prairie Av.	n/o Del Amo Bl.	Non-Sensitive	70.0	70.1	70.2	0.1	0.2	n/a	No
5	Prairie Av.	s/o Del Amo Bl.	Non-Sensitive	69.4	69.4	69.4	0.0	0.0	n/a	No
6	Crenshaw Bl.	n/o 190th St.	Sensitive	70.6	70.8	70.8	0.2	0.2	1.5	No
7	Crenshaw Bl.	s/o 190th St.	Sensitive	71.1	71.4	71.4	0.3	0.3	1.5	No
8	Crenshaw Bl.	s/o Del Amo Bl.	Sensitive	70.8	70.8	70.8	0.0	0.0	1.5	No
9	190th St.	w/o Prairie Av.	Sensitive	67.6	67.6	67.6	0.0	0.0	1.5	No
10	190th St.	e/o Prairie Av.	Sensitive	68.7	68.7	68.7	0.0	0.0	1.5	No
11	190th St.	w/o Van Ness Av.	Non-Sensitive	70.2	70.4	70.4	0.2	0.2	3.0	No
12	Del Amo Bl.	w/o Hawthorne Bl.	Non-Sensitive	67.3	67.3	67.3	0.0	0.0	n/a	No
13	Del Amo Bl.	w/o Prairie Av.	Non-Sensitive	68.1	68.2	68.2	0.1	0.1	n/a	No
14	Del Amo Bl.	w/o Maple Av.	Non-Sensitive	67.3	68.0	68.0	0.7	0.7	n/a	No
15	Del Amo Bl.	w/o Crenshaw Bl.	Non-Sensitive	68.1	68.1	68.1	0.7	0.7	68.3	68.2

Source: Urban Crossroads, 2025 (Appendix M)

Notes: CNEL = Community Noise Equivalent Level; dBA = A-weighted decibels; ID = identification; Bl. = Boulevard; Av. = Avenue; St. = Street; n/o = north of; s/o = south of; w/o = west of; e/o = east of; Sensitive = Sensitive noise receptors, which are locations where the presence of noise can have an adverse effect on human activity or well-being, including residences, schools, hospitals, and parks; Non-Sensitive = Non-sensitive noise receptors, which are locations that are not substantially affected by noise, such as commercial or industrial areas; n/a = not applicable

CNEL at Receiving Land Use – CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

Receiving Land Use – The receiving land use is based on a review of existing aerial imagery. Noise-sensitive land use is generally limited to residential areas because residents are more likely to be impacted by noise over time, especially during the nighttime hours when noise can disrupt sleep and overall quality of life.

Table 4.7-19. Existing Off-Site Traffic Noise Level Increases

ID	Roadway	Segment	Receiving Land Use	CNEL at Receiving Land Use (dBA)			Incremental Noise Level Increase		Increase Threshold	
				EAC No Project	EAC With Project (Single Tenant)	EAC With Project (Two Tenant)	EAC With Project (Single Tenant)	EAC With Project (Two Tenant)	Limit	Exceeded?
1	Hawthorne Bl.	n/o Del Amo Bl.	Sensitive	72.2	72.2	72.2	0.0	0.0	1.5	No
2	Prairie Av.	n/o 190th St.	Sensitive	68.9	69.0	69.0	0.1	0.1	1.5	No
3	Prairie Av.	s/o 190th St.	Sensitive	70.0	70.1	70.1	0.1	0.1	1.5	No
4	Prairie Av.	n/o Del Amo Bl.	Non-Sensitive	70.1	70.2	70.2	0.1	0.1	n/a	No
5	Prairie Av.	s/o Del Amo Bl.	Non-Sensitive	69.4	69.5	69.5	0.1	0.1	n/a	No
6	Crenshaw Bl.	n/o 190th St.	Sensitive	70.8	71.0	71.0	0.2	0.2	1.5	No
7	Crenshaw Bl.	s/o 190th St.	Sensitive	71.2	71.6	71.6	0.4	0.4	1.5	No
8	Crenshaw Bl.	s/o Del Amo Bl.	Sensitive	70.9	71.0	71.0	0.1	0.1	1.5	No
9	190th St.	w/o Prairie Av.	Sensitive	67.7	67.8	67.8	0.1	0.1	1.5	No
10	190th St.	e/o Prairie Av.	Sensitive	68.8	68.8	68.9	0.0	0.1	1.5	No
11	190th St.	w/o Van Ness Av.	Non-Sensitive	70.4	70.7	70.6	0.3	0.2	3.0	No
12	Del Amo Bl.	w/o Hawthorne Bl.	Non-Sensitive	67.4	67.4	67.4	0.0	0.0	n/a	No
13	Del Amo Bl.	w/o Prairie Av.	Non-Sensitive	68.3	68.3	68.3	0.0	0.0	n/a	No
14	Del Amo Bl.	w/o Maple Av.	Non-Sensitive	67.4	68.2	68.1	0.8	0.7	n/a	No
15	Del Amo Bl.	w/o Crenshaw Bl.	Non-Sensitive	67.5	68.3	68.2	0.8	0.7	n/a	No

Source: Urban Crossroads, 2025 (Appendix M)

Notes: CNEL = Community Noise Equivalent Level; dBA = A-weighted decibels; ID = identification; EAC = Existing plus Ambient plus Cumulative; Bl. = Boulevard; Av. = Avenue; St. = Street; n/o = north of; s/o = south of; w/o = west of; e/o = east of; Sensitive = Sensitive noise receptors, which are locations where the presence of noise can have an adverse effect on human activity or well-being, including residences, schools, hospitals, and parks; Non-Sensitive = Non-sensitive noise receptors, which are locations that are not substantially affected by noise, such as commercial or industrial areas; n/a = not applicable

CNEL at Receiving Land Use – CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

Receiving Land use – The receiving land use is based on a review of existing aerial imagery. Noise-sensitive land use is generally limited to residential areas because residents are more likely to be impacted by noise over time, especially during the nighttime hours when noise can disrupt sleep and overall quality of life.

Increase Threshold – The increase threshold indicates whether the Project would create an incremental noise level increase exceeding the significance criteria in Table 4.7-13.

Based on the significance criteria for off-site traffic noise presented in Table 4.7-13, land uses adjacent to the study area roadway segments would experience less than significant noise level increases on receiving land uses due to the Project-related traffic.

Operations and Maintenance

LESS THAN SIGNIFICANT. This section evaluates potential stationary-source operational noise impacts at the nearest sensitive receptor locations, as identified in Section 4.7.1 and shown on Figure 4.7-2. To provide a conservative assessment of the worst-case noise environment, Figure 4.7-4 illustrates the 37 individual operational noise sources used in the analysis. To minimize noise exposure to nearby noise-sensitive residential areas, several design features were incorporated during the site planning process. These features include locating loading dock areas behind the warehouse building to utilize the structure as a noise screen, and constructing a 14-foot-high noise barrier around the tractor trailer storage area to further reduce off-site noise transmission. These design features are consistent with the Attorney General Office's Bureau of Environmental Justice guidance document that contains best practices for warehouse projects (Department of Justice, 2022).

This operational noise analysis evaluates potential noise level impacts associated with typical daytime and nighttime activities at the Project site. To conservatively assess worst-case conditions, the analysis assumes the Project would operate 24 hours per day, seven days per week. As is typical for warehouse and industrial uses, most business operations would occur within enclosed buildings; however, some activities, such as truck movements, parking, and loading/unloading at designated bays, would occur outdoors. Anticipated on-site operational noise sources include cold storage loading dock activities, tractor trailer storage operations, rooftop air conditioning units, parking lot vehicle movements, trash enclosure usage, and general truck circulation.

To estimate operational noise impacts associated with the Project, reference noise level measurements were obtained from comparable activities at similar facilities. These measurements were used to represent the types and intensity of noise expected from full buildout and operation of the proposed Project. This section provides a detailed description of the reference noise levels summarized in Table 4.7-20, which form the basis for the operational noise impact analysis. It is important to note that the projected noise levels reflect a conservative, worst-case scenario in which all identified noise sources are assumed to be operating simultaneously. In practice, the timing and intensity of these sources would vary throughout the day, and actual noise levels are expected to be lower during typical operations.

Figure 4.7-4. Operational Noise Source Locations

Table 4.7-20. Reference Noise Level Measurements

Reference Noise Source	Noise Source Height (Feet)	Min./Hour		Reference Noise Level (dBA L_{eq}) at 50 Feet	Sound Power Level (dBA)
		Daytime	Nighttime		
Cold Storage Loading Dock Activity	8	60	60	65.7	111.5
Tractor Trailer Storage Activity	8	60	60	62.8	103.4
Roof-Top Air Conditioning Units	5	39	28	57.2	88.9
Parking Lot Vehicle Movements	5	60	60	52.6	81.1
Trash Enclosure Activity	5	60	30	57.3	89.0
Truck Movements	8	60	60	59.8	93.2

Source: Urban Crossroads, 2025 (Appendix M)

Notes: Min./Hour = minutes within the hour; dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; Daytime = 7:00 a.m.–10:00 p.m.; Nighttime = 10:00 p.m.–7:00 a.m.

Min./Hour – Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site.

Sound Power Level – Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels were calculated using the Computer Aided Noise Abatement (CadnaA) noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.

The reference noise level measurements presented in this section were collected by Urban Crossroads using a Larson Davis LxT Type 1 precision sound level meter (serial number 01146). The LxT sound level meter was calibrated using a Larson-Davis calibrator, Model CAL 200, was programmed in "slow" mode to record noise levels in "A" weighted form and was located at approximately five feet above the ground elevation for each measurement. The sound level meters and microphones were equipped with a wind-screen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013 (Urban Crossroads, 2025).

Cold Storage Loading Dock Activity

The reference cold storage loading dock activities are intended to describe the typical outdoor operational noise activities associated with the Project. This includes truck idling, reefer activity (refrigerator truck/cold storage), deliveries, backup alarms, trailer docking including a combination of tractor trailer semi-trucks, two-axle delivery trucks, and background operation activities. Since the noise levels generated by cold storage loading dock activity can be higher due to the use of refrigerated trucks or reefers, this reference noise level conservatively assumes that all loading dock activity is associated with cold storage facilities (Urban Crossroads, 2025). The reference noise level measurement was taken in the center of the loading dock activity area and represents multiple concurrent noise sources resulting in a combined noise level of 65.7 dBA L_{eq} at a uniform distance of 50 feet. Specifically, the reference noise level measurement represents one truck located approximately 30 feet from the noise level meter with another truck passing by to park roughly 20 feet away, both with their engines idling. Throughout the reference noise level measurement, a separate docked and running reefer truck was located approximately 50 feet east of the measurement location. Additional background noise sources included truck pass-by noise, truck drivers talking to each other next to docked trucks, and air brake release noise when trucks parked.

Tractor Trailer Storage Activity

To evaluate the noise levels associated with truck idling, backup alarms, trailer movements and storage activities, Urban Crossroads collected a reference noise level measurement at an existing parcel hub facility to describe the potential operational noise levels associated with Project tractor trailer storage activities. The measured reference noise level at 50 feet from activities was measured at 62.8 dBA L_{eq} . The

reference noise level measurement includes a semi-truck with trailer pass-by event, background switcher cab trailer towing, drop-off, idling, and backup alarm events. Tractor trailer activity is estimated during all the daytime, evening, and nighttime hours.

Roof-Top Air Conditioning Units

The reference noise level represents a Lennox SCA120 series 10-ton model packaged air conditioning unit. At the uniform reference distance of 50 feet, the reference noise level is 59.2 dBA L_{eq} . Based on the typical operating conditions observed over a four-day measurement period, the roof-top air conditioning units are estimated to operate for an average of 39 minutes per hour during the daytime hours, and 28 minutes per hour during the nighttime hours. These operating conditions reflect peak summer cooling requirements with measured temperatures approaching 96 degrees Fahrenheit (°F) with average daytime temperatures of 82°F. For this noise analysis, seven roof-top air conditioning units are assumed to be located above the planned office spaces.

Parking Lot Vehicle Movements

To describe the on-site parking lot activity, a long-term reference noise level measurement was collected in the center of activity within the staff parking lot of a warehouse distribution center. At 50 feet from the center of activity, the parking lot produced a reference noise level of 56.1 dBA L_{eq} . Parking activities are expected to take place during the full hour (60 minutes) throughout the daytime and evening hours. The parking lot noise levels are mainly due to cars pulling in and out of parking spaces in combination with car doors opening and closing.

Trash Enclosure Activity

To describe the noise levels associated with trash enclosure activity, Urban Crossroads collected a reference noise level measurement at an existing trash enclosure containing two dumpster bins. The trash enclosure noise levels describe metal gates opening and closing, metal scraping against concrete floor sounds, dumpster movement on metal wheels, and trash dropping into the metal dumpster. The reference noise levels describe trash enclosure noise activities when trash is dropped into an empty metal dumpster, as would occur at the Project Site. The measured reference noise level at the uniform 50-foot reference distance is 59.3 dBA L_{eq} for the trash enclosure activity. The reference noise level describes the expected noise source activities associated with the trash enclosures for the Project's proposed building.

Truck Movements

The truck movements reference noise level measurement was collected over a period of 1 hour and 28 minutes and represents multiple heavy trucks entering and exiting the outdoor loading dock area producing a reference noise level of 59.8 dBA L_{eq} at 50 feet. The noise sources included at this measurement location account for trucks entering and existing the Project driveways and maneuvering in and out of the outdoor loading dock activity area.

To fully describe the exterior operational noise levels from the Project, Urban Crossroads developed a noise prediction model using the CadnaA computer program. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise levels. Using the International Organization for Standardization (ISO) 9613-2 protocol, CadnaA will calculate the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of noise levels at each receiver and the partial noise level contributions by noise source (Urban Crossroads, 2025).

Sound pressure levels vary substantially with distance from the source and diminish because of intervening obstacles and barriers, air absorption, wind, and other factors. Sound power is the acoustical energy emitted by the sound source and is an absolute value that is not affected by the environment. The

operational noise level calculations provided in this noise analysis account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern. A default ground attenuation factor of 0.5 was used in the noise analysis to account for mixed ground representing a combination of hard and soft surfaces. This approach ensures a reasonable approximation in environments where both hard and soft surfaces exist, aligning with typical real-world conditions. Appendix M, the Noise Impact Analysis prepared by Urban Crossroads (2025) includes the detailed noise dBA L_{eq} model inputs including the planned 14-foot-high noise barrier used to estimate the Project operational noise levels presented in this section.

Using the reference noise levels to represent the proposed Project operations that include cold storage loading dock activity, tractor trailer storage activity, roof-top air conditioning units, parking lot vehicle movements, trash enclosure activity and truck movements, Urban Crossroads calculated the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations. Table 4.7-21 shows the Project operational noise levels during the daytime hours of 7:00 a.m. to 10:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 41.7 to 49.5 dBA L_{eq} .

Table 4.7-21. Daytime Project Operational Noise Levels

Noise Source	Operational Noise Levels by Receiver Location (dBA L_{eq})				
	R1	R2	R3	R4	R5
Cold Storage Loading Dock Activity	27.5	25.2	24.2	22.2	30.5
Tractor Trailer Storage Activity	49.0	44.2	42.2	40.7	47.6
Roof-Top Air Conditioning Units	32.3	32.6	31.9	30.3	37.6
Parking Lot Vehicle Movements	32.3	35.4	32.2	28.9	33.5
Trash Enclosure Activity	10.2	6.8	6.1	5.4	28.0
Truck Movements	37.1	35.5	31.8	29.8	36.1
Total (All Noise Sources)	49.5	45.5	43.3	41.7	48.5

Source: Urban Crossroads, 2025 (Appendix M)

Notes: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level

Noise Source – See Figure 4.7-4 for the operational noise source locations.

Operational Noise Levels by Receiver Location – Computer Aided Noise Abatement (CadnaA) noise model calculations are included in Appendix M.

Table 4.7-22. Nighttime Project Operational Noise Levels

Noise Source	Operational Noise Levels by Receiver Location (dBA L_{eq})				
	R1	R2	R3	R4	R5
Cold Storage Loading Dock Activity	27.5	25.2	24.2	22.2	30.5
Tractor Trailer Storage Activity	49.0	44.2	42.2	40.7	47.6
Roof-Top Air Conditioning Units	29.8	30.2	29.5	27.9	35.2
Parking Lot Vehicle Movements	32.3	35.4	32.2	28.9	33.5
Trash Enclosure Activity	9.2	5.9	5.2	4.4	27.1
Truck Movements	37.1	35.5	31.8	29.8	36.1
Total (All Noise Sources)	49.4	45.4	43.2	41.5	48.4

Source: Urban Crossroads, 2025 (Appendix M)

Notes: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level

Noise Source – See Figure 4.7-4 for the operational noise source locations.

Operational Noise Levels by Receiver Location – Computer Aided Noise Abatement (CadnaA) noise model calculations are included in Appendix M.

To demonstrate compliance with applicable local noise regulations, the Project-only operational noise levels were evaluated against the exterior noise level standards established by the City of Torrance for noise-sensitive land uses. These standards specify a maximum of 55 dBA L_{eq} during daytime hours and 50 dBA L_{eq} during nighttime hours. As shown in Table 4.7-23, the projected operational noise levels associated with the Del Amo Technology Center are expected to remain within these thresholds at all of the nearest noise-sensitive receptor locations. Therefore, operational noise impacts are considered less than significant.

Table 4.7-23. Operational Noise Level Compliance

Receiver Location	Project Operational Noise Levels (dBA Leq)		Noise Level Standards (dBA Leq)		Noise Level Standards Exceeded?	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	49.5	49.4	55	50	No	No
R2	45.5	45.4	55	50	No	No
R3	43.3	43.2	55	50	No	No
R4	41.7	41.5	55	50	No	No
R5	48.5	48.4	55	50	No	No

Source: Urban Crossroads, 2025 (Appendix M)

Notes: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; Daytime = 7:00 a.m.–10:00 p.m.; Nighttime = 10:00 p.m.–7:00 a.m.

Receiver Location – See Figure 4.7-2 for the noise-sensitive receptor locations.

Project Operational Noise Levels – Proposed Project unmitigated operational noise levels are shown in Table 4.7-21 and Table 4.7-22.

Noise Level Standards – Exterior noise level standards for source (commercial) land use are shown in Table 4.7-13.

Noise Level Standards Exceeded – Do the estimated Project operational noise source activities exceed the noise level standards?

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearby receiver locations potentially impacted by Project operational noise sources. Since the units used to measure noise, dB, are logarithmic units, the Project-operational and existing ambient noise levels cannot be combined using standard arithmetic equations. (2) Instead, they must be logarithmically added using the following base equation:

$$SPL_{Total} = 10 \log_{10} [10^{SPL1/10} + 10^{SPL2/10} + \dots 10^{SPLn/10}]$$

“SPL1,” “SPL2,” etc. are equal to the sound pressure levels being combined, or in this case, the Project-operational and existing ambient noise levels. The difference between the combined Project and ambient noise levels describes the Project noise level increases to the existing ambient noise environment.

Table 4.7-24. Daytime Project Operational Noise Level Increases

Receiver Location	Total Project Operational Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient	Project Increase	Increase Criteria	Increase Criteria Exceeded?
R1	49.5	L1	71.9	71.9	0.0	1.5	No
R2	45.5	L2	67.6	67.6	0.0	1.5	No
R3	43.3	L3	66.6	66.6	0.0	1.5	No
R4	41.7	L4	57.0	57.1	0.1	5.0	No
R5	48.5	L5	69.1	69.1	0.0	1.5	No

Source: Urban Crossroads, 2025 (Appendix M)

Notes: Noise levels are expressed in terms of dBA L_{eq} (A-weighted decibels, equivalent continuous sound level).

Receiver Location – See Figure 4.7-2 for the noise-sensitive receptor locations.

Total Project Operational Noise Level – Total Project daytime mitigated operational noise levels are shown in Table 4.7-21.

Measurement Location – Reference noise level measurement locations are shown on Figure 4.7-1.

Reference Ambient Noise Levels – Observed daytime ambient noise levels are shown in Table 4.7-4.

Combined Project and Ambient – This represents the combined ambient conditions plus the Project activities.

Project Increase – This represents the noise level increase expected with the addition of the proposed Project activities.

Increase Criteria – Significant increase criteria are shown in Table 4.7-13.

Table 4.7-25. Nighttime Project Operational Noise Level Increases

Receiver Location	Total Project Operational Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient	Project Increase	Increase Criteria	Increase Criteria Exceeded?
R1	49.4	L1	69.3	69.3	0.0	1.5	No
R2	45.4	L2	63.8	63.9	0.1	3.0	No
R3	43.2	L3	60.7	60.8	0.1	3.0	No
R4	41.5	L4	47.3	48.3	1.0	5.0	No
R5	48.4	L5	69.3	69.3	0.0	1.5	No

Source: Urban Crossroads, 2025 (Appendix M)

Notes: Noise levels are expressed in terms of dBA L_{eq} (A-weighted decibels, equivalent continuous sound level).

Receiver Location – See Figure 4.7-2 for the noise-sensitive receptor locations.

Total Project Operational Noise Level – Total Project daytime mitigated operational noise levels are shown in Table 4.7-22.

Reference Ambient Noise Levels – Reference noise level measurement locations are shown on Figure 4.7-1.

Reference Ambient Noise Levels – Observed nighttime ambient noise levels are shown in Table 4.7-4.

Combined Project and Ambient – This represents the combined ambient conditions plus the Project activities.

Project Increase – This represents the noise level increase expected with the addition of the proposed Project activities.

Increase Criteria – Significant increase criteria are shown in Table 4.7-13.

As indicated in Table 4.7-24, the Project would generate a daytime operational noise level increase ranging from 0.0 to 0.1 dBA L_{eq} at the nearest receiver locations. Table 4.7-25 shows that the Project would generate a nighttime operational noise increase ranging from 0.0 to 1.0 dBA L_{eq} at the nearest receiver locations. Appendix M, the Noise Impact Analysis includes the detailed noise dBA L_{eq} model inputs (Urban Crossroads, 2025). The Project-related operational noise level increases would not exceed the operational noise level increase significance criteria presented in Table 4.7-13. Therefore, the incremental Project operational noise level increase is considered less than significant at all noise-sensitive receptor locations.

Impact NOI-2: Expose persons to or generate excessive groundborne vibration.

Construction

LESS THAN SIGNIFICANT. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed, distance to the affected structures, and soil type. Construction vibration is generally associated with pile driving and rock blasting. However, no pile driving, or rock blasting activities are planned for the Project, but the Project does include the use of a large rock drill with an 8-foot diameter auger (sometimes referred to as a “Caison Drill”) during the Remediation phase. It is expected that groundborne vibration from Project construction activities would cause only intermittent, localized intrusion. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized in Table 4.7-26. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential for building damage using the following vibration assessment methods defined by the FTA. To describe vibration impacts, the FTA provides the following equation:

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

PPV_{equip} represents the calculated peak particle velocity caused by the construction equipment at a specific distance. PPV_{ref} is the reference vibration level for the specific type of heavy construction equipment. D signifies the distance in feet from the construction equipment to the point of interest (e.g., a nearby structure). The value of 25 represents the fixed reference distance in feet where the PPV_{ref} is typically measured. The exponent of 1.5 reflects the combined effects of vibration propagation and attenuation through the ground.

Table 4.7-26. Project Operational Noise Level Increases

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large Bulldozer/Caisson Drill	0.089
Vibratory Roller	0.210

Source: Urban Crossroads, 2025 (Appendix M)

Notes: PPV = peak particle velocity; in/sec – inches per second

Table 4.7-26 presents the expected Project related vibration levels at 25 feet from the source. At distances ranging from 159 to 801 feet from Project construction activities, and using the above equation for calculating PPV from Project equipment, construction vibration velocity levels are estimated to range from 0.001 to 0.013 in/sec PPV. Based on a maximum acceptable continuous vibration threshold of 0.3 in/sec PPV, the typical Project construction vibration levels would not exceed the building damage thresholds at any nearby receiver locations. Moreover, the vibration levels reported at the sensitive receiver locations are unlikely to be sustained during the entire construction period but would rather occur only during the times that heavy construction equipment is operating adjacent to the Project site perimeter. Therefore, the Project-related vibration impacts are considered less than significant during typical construction activities at the Project site.

Operations and Maintenance

NO IMPACT. The Project would not involve the use of equipment or activities capable of generating perceptible levels of groundborne vibration at nearby sensitive receptors. Therefore, there would be no impacts related to operational groundborne vibrations.

4.7.3.4. Mitigation Measures

No mitigation is required.

4.7.4. Cumulative Impact Analysis

As discussed in Sections 4.7.1, Noise Fundamentals, and 4.7.2, Environmental Setting, average sound levels in an area are directly determined by the proximity to the various noise-generating activities. Unless such activities in the area change dramatically, average sound levels also do not change appreciably over time. For example, a doubling of noise generating activity of the same or similar type (e.g., traffic with the same or similar distribution of vehicular types) resulting in a 3 dBA increase in noise levels would be considered barely detectable to most people. Therefore, ambient sound level measurements tend to be reasonably consistent over time provided there has been no substantial change in noise-generating activity.

The Project site, and the general surrounding vicinity of the site and of similar projects in the area are characterized by industrial facilities, visitor-serving commercial areas, limited residential and open space and recreational areas. The acoustical environment at the Project site and vicinity is dominated by the transportation-related noise associated with surface streets.

Geographic Extent/Context

For the purposes of cumulative noise impacts as a result of past, present, and reasonably foreseeable future projects, the study area includes those sensitive receptors closest to the Project site at the nearby multi-family residences, church, transient guest hotel, and park that might be cumulatively affected by construction noise, operational noise, or noise associated with traffic generated by the Proposed Project, or an alternative, and those projects in the vicinity that would considerably contribute to cumulative

effects. Existing cumulative baseline noise conditions would be that of typical city ambient noise environments. Construction activities associated with the Project and other current and reasonably foreseeable projects, either individually or collectively, could result in cumulatively considerable increases in noise levels throughout the Project vicinity. However, the Project would comply with all applicable standards, regulations, and requirements to reduce potential noise-related impacts. It is anticipated that the listed current and reasonably foreseeable projects would also comply with local, state, and federal standards and regulations in a similar manner.

Cumulative Impact Analysis

Onsite Construction Noise Impacts

The proposed Project would be constructed over an approximately 35-month schedule, assumed to begin in 2026. The related projects (Table 3-1 in Section 3.0) were reviewed to determine if any projects in the vicinity of the sensitive receptors described above would be under construction at the same time as the proposed Project; in such a case, construction activities could, in combination, cause a cumulative construction noise impact on sensitive receptors.

Because there are no other construction projects scheduled to occur within 500 feet of a sensitive noise receptor (FTA, 2018), no projects listed in Table 3-1 are anticipated to involve pile driving activity in the vicinity of the proposed Project, and the Project itself is not expected to exceed applicable construction noise thresholds (i.e., a 12 dBA increase over ambient levels or the 80 dBA Leq threshold established by the FTA), the Project's contribution to cumulative construction noise levels would not be considered cumulatively considerable.

Offsite Traffic Noise Impacts

Table 4.7-27 below presents a summary of the cumulative and Project incremental noise level increases for each of the study area roadway segments. The cumulative traffic noise analysis describes the future changes in noise levels in comparison to the existing baseline noise levels. As shown in Table 4.7-27, the overall cumulative increase in off-site traffic noise levels from the Existing (baseline) to future EAC (2027) with Project conditions ranges from 0.1 to 0.8 dBA CNEL. The Project increment or cumulative contribution shown in Table 4.7-27 ranging from 0.0 to 0.7 dBA CNEL represents the difference between the EAC (2027) without Project and the EAC (2027) (Two Tenant) with Project conditions. Based on the significance criteria for off-site traffic noise presented in Table 4.7-27, land uses adjacent to the study area roadway segments would experience less than significant noise level impacts due to Project-related traffic. Therefore, the Project's contribution to cumulative traffic noise levels would not be cumulatively considerable.

Vibration

The construction vibration levels associated with the proposed Project are not expected to exceed any applicable thresholds at nearby sensitive receptors. Additionally, when considered in combination with other existing or planned developments in the area, the Project would not expose persons or generate groundborne vibrations in exceedance of the recommended thresholds established by the FTA during the construction phase. As such, the Project's contribution to cumulative construction groundborne vibration impacts would not be cumulatively considerable.

Table 4.7-27. Cumulative Off-Site Traffic Noise Level Increases

ID	Roadway	Segment	Receiving Land Use	CNEL at Receiving Land Use (dBA CNEL)					Increase Threshold	
				Existing No Project (a)	EAC (2027) Without Project (b)	EAC (2027) With Project (c)	Cumulative Increase (c-a)	Cumulative Contribution (c-b)	Limit	Exceeded?
1	Hawthorne Bl.	n/o Del Amo Bl.	Sensitive	72.1	72.2	72.2	0.1	0.0	1.5	No
2	Prairie Av.	n/o 190th St.	Sensitive	68.9	68.9	69.0	0.1	0.1	1.5	No
3	Prairie Av.	s/o 190th St.	Sensitive	69.9	70.0	70.1	0.2	0.1	1.5	No
4	Prairie Av.	n/o Del Amo Bl.	Non-Sensitive	70.0	70.1	70.2	0.2	0.1	1.5	No
5	Prairie Av.	s/o Del Amo Bl.	Non-Sensitive	69.4	69.4	69.5	0.1	0.1	1.5	No
6	Crenshaw Bl.	n/o 190th St.	Sensitive	70.6	70.8	71.0	0.4	0.2	1.5	No
7	Crenshaw Bl.	s/o 190th St.	Sensitive	71.1	71.2	71.6	0.5	0.4	1.5	No
8	Crenshaw Bl.	s/o Del Amo Bl.	Sensitive	70.8	70.9	71.0	0.2	0.1	1.5	No
9	190th St.	w/o Prairie Av.	Sensitive	67.6	67.7	67.8	0.2	0.1	1.5	No
10	190th St.	e/o Prairie Av.	Sensitive	68.7	68.8	68.9	0.2	0.1	1.5	No
11	190th St.	w/o Van Ness Av.	Non-Sensitive	70.2	70.4	70.6	0.4	0.2	1.5	No
12	Del Amo Bl.	w/o Hawthorne Bl.	Non-Sensitive	67.3	67.4	67.4	0.1	0.0	1.5	No
13	Del Amo Bl.	w/o Prairie Av.	Non-Sensitive	68.1	68.3	68.3	0.2	0.0	1.5	No
14	Del Amo Bl.	w/o Maple Av.	Non-Sensitive	67.3	67.4	68.1	0.8	0.7	1.5	No
15	Del Amo Bl.	w/o Crenshaw Bl.	Non-Sensitive	67.4	67.5	68.2	0.8	0.7	1.5	No

Source: Urban Crossroads, 2025 (Appendix M)

Notes: CNEL = Community Noise Equivalent Level; dBA = A-weighted decibels; ID = identification; EAC = Existing plus Ambient plus Cumulative; Bl. = Boulevard; Av. = Avenue; St. = Street; n/o = north of; s/o = south of; w/o = west of; e/o = east of; Sensitive = Sensitive noise receptors, which are locations where the presence of noise can have an adverse effect on human activity or well-being, including residences, schools, hospitals, and parks; Non-Sensitive = Non-sensitive noise receptors, which are locations that are not substantially affected by noise, such as commercial or industrial areas

CNEL at Receiving Land Use – CNEL is calculated at the boundary of the ROW of each roadway and the property line of the receiving land use.

Receiving Land Use – The receiving land use is based on a review of existing aerial imagery. Noise-sensitive land use is generally limited to residential areas because residents are more likely to be impacted by noise over time, especially during the nighttime hours when noise can disrupt sleep and overall quality of life.

Increase Threshold – The increase threshold indicates whether the Project would create an incremental noise level increase exceeding the significance criteria in Table 4.7-13.

Operation

The operational noise levels associated with the proposed Project are not expected to exceed any applicable exterior noise level thresholds at nearby sensitive receptors. Additionally, when considered in combination with other existing or planned developments in the area, with the closest project listed in Table 3-1 being over 3,000 feet to the east, the Project would not result in a perceptible or substantial increase in ambient noise levels. As such, the Project's contribution to cumulative operational noise impacts would not be cumulatively considerable.

The Project would not involve the use of equipment or activities capable of generating perceptible levels of groundborne vibration at nearby sensitive receptors. Additionally, when considered in combination with other existing or planned developments in the area, the Project would not expose persons or generate groundborne vibrations in exceedance of the recommended thresholds established by the FTA during operations. As such, the Project's contribution to cumulative operational groundborne vibration impacts would not be cumulatively considerable.

4.7.5. Summary of Significance Findings

Table 4.7-28 provides a summary of each identified noise impact and associated mitigation measures to reduce or avoid the impact (where warranted). Mitigation measures are required for each significant impact but are not required for impacts that are not significant.

Table 4.7-28. Summary of Noise Impacts and Mitigation Measures

Impacts	Mitigation Measures
Impact NOI-1: Expose persons to or generate temporary or permanent noise levels in excess of established standards.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact NOI-2: Expose persons to or generate excessive groundborne vibration.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.

4.8. Transportation

This section addresses the effects related to transportation and circulation from implementation of the proposed Project. This section describes existing environmental conditions in the affected area, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts from the construction and operation of the proposed Project. Existing regulations, policies, and standards relevant to transportation and circulation are described and how they would be applicable to the proposed Project. In some cases, compliance with existing laws and regulations would reduce or avoid impacts that might otherwise occur with implementation of the proposed Project.

The following discussion is based on a Vehicle Miles Traveled Analysis (Urban Crossroads, 2025) provided in Appendix N, unless otherwise referenced. The proposed Project's potential effects on transportation and circulation were evaluated using the criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are discussed in more detail in Section 4.8.3.2, Environmental Impact Analysis. The analysis concludes that the proposed Project impacts associated with transportation and circulation would be less than significant.

During the scoping period for the Environmental Impact Report (EIR) (March 28, 2025, to April 28, 2025), verbal and written comments were received from agencies (Caltrans and the City of Torrance), organizations, and the public. These comments identified various issues and concerns relevant to the EIR analysis. The following issues related to transportation and circulation were raised during the scoping period and are addressed in this section.

- Although the logistics industry is an important component of the economy, warehouses can result in environmental impacts, including those related to air quality and health, noise, and transportation.
- Land use conflicts between warehouses and sensitive receptors must be avoided, and impacts from any unavoidable conflicts must be mitigated.
- The Attorney General Office's Bureau of Environmental Justice requests consideration of a guidance document that contains best practices and mitigation measures for warehouse projects.

4.8.1. Environmental Setting

The transportation and circulation issue area refers to the infrastructure and networks that are used for the physical movement of people and goods. Included in this discipline are roadways, sidewalks, bike paths, bike lanes, and public transit. Railroads, airports, and harbor facilities are also types of transportation infrastructure; however, these facilities are not addressed in this analysis because the proposed Project would result in no impacts for these transportation categories.

The study area roadways that would primarily be affected by the proposed Project are identified in Table 4.8-1, Study Area Roadways. The table shows the roadway segments and the responsible agency that has jurisdiction for each roadway. These are the roads that would be used to access the Project site.

Table 4.8-1. Study Area Roadways

Roadway	Jurisdiction	Number of Lanes
Hawthorne Boulevard/State Route 107	Caltrans	8
Prairie Avenue	City of Torrance	4-6
Madrona Avenue	City of Torrance	6
Maple Avenue	City of Torrance	4
Crenshaw Boulevard	City of Torrance	6
Van Ness Avenue	City of Torrance	4

Roadway	Jurisdiction	Number of Lanes
Western Avenue/State Route 213	Caltrans	6
182 nd Street	City of Torrance	4
190 th Street		
West of Crenshaw Boulevard	City of Torrance	4-5
East of Crenshaw Boulevard	City of Torrance	5-6
Del Amo Boulevard	City of Torrance	4
Torrance Boulevard	City of Torrance	5-6
Interstate 405 – San Diego Freeway	Caltrans	10

There are 15 intersections in the study area that could potentially be affected by the proposed Project. The 15 intersections, the responsible jurisdiction, and the type of traffic control currently in place at each intersection are listed in Table 4.8-2.

Table 4.8-2. Study Area Intersections

Intersection	Jurisdiction	Type of Traffic Control
1. Hawthorne Boulevard at Del Amo Boulevard	City of Torrance	Traffic Signal
2. Prairie Avenue at 190 th Street	City of Torrance	Traffic Signal
3. Prairie Avenue at Driveway 1	City of Torrance	None. Future Intersection
4. Prairie Avenue at Del Amo Boulevard	City of Torrance	Traffic Signal
5. Madrona Avenue at Torrance Boulevard	City of Torrance	Traffic Signal
6. Del Amo Boulevard at Driveway 2	City of Torrance	None. Future Intersection
7. Del Amo Boulevard at Maple Avenue/Driveway 3	City of Torrance	Traffic Signal
8. I-405 Northbound Ramps at 182 nd Street	Caltrans	Traffic Signal
9. I-405 Southbound Ramps at Crenshaw Boulevard	Caltrans	Traffic Signal
10. Crenshaw Boulevard at 190 th Street	City of Torrance	Traffic Signal
11. Crenshaw Boulevard at Del Amo Boulevard	City of Torrance	Traffic Signal
12. Van Ness Avenue at 190 th Street	City of Torrance	Traffic Signal
13. I-405 Southbound Ramps at 190 th Street	Caltrans	Traffic Signal
14. Western Avenue at I-405 Northbound Ramps	Caltrans	Traffic Signal
15. Western Avenue at 190 th Street	Caltrans	Traffic Signal

With regard to existing pedestrian facilities in the vicinity of the Project site, sidewalks are in place along both sides of Hawthorne Boulevard, Prairie Avenue, Madrona Avenue, Maple Avenue, Crenshaw Boulevard, 190th Street, and Del Amo Boulevard west of Maple Avenue. The segment of Del Amo Boulevard east of the Project site between Maple Avenue and Crenshaw Boulevard does not have sidewalks. Pedestrian crosswalks with pedestrian push buttons and pedestrian WALK signals are in place at all of the signalized intersections in the study area.

With regard to existing bicycle facilities in the vicinity of the Project site, bike lanes are in place on 190th Street west of Prairie Avenue and on Torrance Boulevard. Prairie Avenue, Madrona Avenue, 190th Street east of Prairie Avenue, and Del Amo Boulevard west of Prairie Avenue are designated as bike routes with signs.

With regard to public transit, Torrance Transit operates several bus routes in the vicinity of the Project site, as follows:

- Line 6 runs along Prairie Avenue adjacent to the Project site, Madrona Avenue south of the Project site, and 190th Street north of the Project site. Bus stops for Line 6 are located at the Prairie Avenue/Madrona Avenue intersection with Del Amo Boulevard.
- Line 1 runs along Torrance Boulevard.
- Line 2 runs along Torrance Boulevard and Madrona Avenue.
- Line 4X runs along Torrance Boulevard.
- Line 5 runs along Crenshaw Boulevard and Torrance Boulevard.
- Line 8 runs along Hawthorne Boulevard.
- Line 10 runs along Crenshaw Boulevard.

4.8.2. Applicable Regulations, Policies, and Standards

The roadway network within the study area is within the jurisdiction of two public agencies: the State of California Department of Transportation (Caltrans) and the City of Torrance. These agencies are responsible for the operation and maintenance of the study area roadways. The State highways, which include Interstate 405 (the San Diego Freeway), Hawthorne Boulevard (State Route 107), and Western Avenue (State Route 213), are in Caltrans' jurisdiction. All of the other roads listed in Table 4.8-1 are in the City of Torrance's jurisdiction. Any modifications to the roadway network would be subject to approval by the responsible public agency and any construction work within the right-of-way of any public roadway would require the issuance of an encroachment permit by the responsible agency.

4.8.2.1. Federal

Federal Highway Administration

The Federal Highway Administration (FHWA), which is an agency within the United States Department of Transportation, provides support to state and local agencies for the design, construction, and maintenance of the nation's highways, bridges, and tunnels. FHWA also conducts research and provides financial and technical assistance to state and local agencies to improve safety and mobility on the highway system. Other than these overall services provided by FHWA, the federal agency has no direct jurisdiction over the study area roadways other than to serve as a source of funding for transportation projects.

4.8.2.2. State

Caltrans

Caltrans manages more than 50,000 miles of California's highway and freeway lanes. This agency also provides inter-city rail services, permits more than 400 public-use airports and special-use hospital heliports, and works cooperatively with local agencies. The State of California is divided into 12 Caltrans districts. The City of Torrance is in Caltrans District 7.

The State highways within the study area's roadway network, which include Interstate 405 (the San Diego Freeway), Hawthorne Boulevard (State Route 107), and Western Avenue (State Route 213), are in Caltrans' jurisdiction. Any modifications to these roadways would be subject to Caltrans District 7 approval and any construction work within the right-of-way of these roadways would require the issuance of a Caltrans encroachment permit.

CEQA and Senate Bill 743

For the purposes of CEQA analyses, the State of California revised the approach for evaluating transportation impacts by de-emphasizing the metrics of vehicle delay and levels of service and instead requiring an evaluation of a project's impacts on vehicle miles traveled (VMT). This change was implemented as a result of Senate Bill 743 and became policy on July 1, 2020.

In response to the new policy, Caltrans prepared a document titled, *Vehicle Miles Traveled – Focused Transportation Impact Study Guide* (Caltrans, 2020). This document replaced the *Guide for the Preparation of Traffic Impact Studies* (Caltrans, 2002). The newer Caltrans guide does not provide significance criteria for evaluating a project's VMT impacts, but instead indicates that the local lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT impacts.

California Vehicle Code

The operation of any vehicle on public roadways is subject to the regulatory requirements of the California Vehicle Code. The Code sets regulations for drivers, pedestrians, and bicyclists, as well as the Department of Motor Vehicles and the California Highway Patrol. The Code also includes traffic laws that apply to drivers and pedestrians, such as yielding to pedestrians in crosswalks and traffic signal compliance.

4.8.2.3. Regional

Southern California Association of Governments

Regional planning for the Project area is conducted by the Southern California Association of Governments (SCAG), which is the designated Metropolitan Planning Organization for the six-county region that includes Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial Counties. SCAG is responsible for periodically preparing a regional transportation plan. The SCAG *Transportation Demand Management Strategic Plan and Final Report* (SCAG, 2019) includes goals and policies that are reflected in local general plans. The goals in the report that are relevant to the proposed Project are as follows:

- Goal 3: Increase the number of households and jobs located within ½ mile of public transit
- Goal 5: Reduce traffic congestion on the region's most congested corridors
- Goal 6: Improve air quality by reducing VMT, through increased use of non-single occupancy vehicle travel modes

Los Angeles County Metropolitan Transportation Authority

Regional transportation planning is also conducted by the Los Angeles County Metropolitan Transportation Authority (LACMTA or Metro). The agency operates the public transit system in the Los Angeles County area and also provides funding and directs planning for railroad and highway projects within Los Angeles County.

4.8.2.4. Local

City of Torrance General Plan – Circulation and Infrastructure Element

The City of Torrance has adopted a Circulation and Infrastructure Element in the City of Torrance General Plan that includes transportation-related goals, objectives, and policies (City of Torrance, 2010). The goals and objectives from this document that are applicable to the proposed Project are described below.

- Goal: Provide a balanced transportation system that provides for the safe, convenient, and efficient movement of people and goods throughout the city and region and an infrastructure system that supports the local economy and quality of life in Torrance.

- Objective C1.1: Provide a regional circulation system that meets the needs of commercial and industrial businesses, facilitates efficient movement of goods, and integrates well with the regional transportation network with minimum adverse effects on Torrance's residential neighborhoods.
- Objective C1.2: Provide a coordinated street network that complements and supports the planned level of development, as expressed in the Land Use Element.
- Objective C1.3: To maintain a Level of Service D or better at intersections within the city.
- Objective C1.4: To provide a safe, efficient, and comprehensive circulation system that serves local needs, meets forecasted demands, and reduces traffic impacts on neighborhoods.

Torrance Municipal Code

The operation of any vehicle on the public roadways in the City of Torrance is subject to the regulatory requirements of the Torrance Municipal Code (TMC). The TMC covers a range of regulations for vehicle operation on roadways, including restrictions on driving over newly paved or marked surfaces, rules for entering/exiting limited-access roads, prohibition of dragging materials, implied consent for driving on private driveways for business, setting speed limits for specific streets, regulating parking of oversized vehicles and trailers on public streets, and establishing rules for colored curbs. Parking or standing oversized vehicles and trailers on public streets or City-owned parking lots is generally prohibited.

4.8.3. Environmental Impacts Analysis and Mitigation

4.8.3.1. Significance Criteria

Project impacts related to transportation and circulation were evaluated against the CEQA significance criteria and are discussed in the following sections. The impact analysis evaluates potential proposed Project impacts during the construction phase and the operation and maintenance phase. The significance criteria listed below are based on Appendix G of the CEQA Guidelines.

Would the proposed Project:

- TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?
- TRA-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which addresses VMT?
- TRA-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- TRA-4: Result in inadequate emergency access?

4.8.3.2. Environmental Impact Analysis

As described in Section 2, Project Description, the proposed Project would include developing a Class A industrial warehouse building, including 15,000 square feet of office space on 31.3 acres of currently vacant land. The proposed building would include 56 dock doors on the northeastern portion of the building. The proposed Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. The proposed Project also includes future road improvements (including installation of a sewer line) along Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court, totaling an additional 7.79 acres.

There are two primary categories of traffic impacts that would occur as a result of the proposed Project. The first category would be impacts associated with construction traffic on roadways providing access to the Project site. During construction activities, a number of vehicles would be traveling to and from the

Project site, including trucks delivering materials to the Project site, trucks transporting waste material away from the site, and construction workers' vehicles commuting to and from the Project site.

The second category of traffic impacts would be the impacts associated with operation and maintenance of the proposed Project after construction is complete. Since the future occupants of the building are currently unknown, the analysis will evaluate both Option 1 – Single Tenant Building and Option 2 – Multi-Tenant Building.

Impact TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Construction

LESS THAN SIGNIFICANT. Construction of the proposed Project would result in the generation of vehicular traffic consisting of automobiles, light-duty trucks, and dump trucks associated with workers commuting to the site, equipment and materials being transported to the site, and dump trucks transporting imported earthwork to the site and exported waste/demolition material from the site. Construction vehicles would utilize any or all roadways listed in Table 4.8-1 and would travel through any or all intersections listed in Table 4.8-2. The construction vehicles would access the site via an existing driveway on Del Amo Boulevard and new temporary driveways on Prairie Avenue and Del Amo Boulevard. No modifications to the design of the existing roadways or intersections would be required to accommodate the construction traffic other than providing temporary site access driveways.

If any component of the proposed Project would temporarily encroach into the right-of-way of a public road, a legally required encroachment permit would be obtained in accordance with the procedures of the City of Torrance. Under TMC Division 6 (Traffic) and Division 7 (Public Works and Property), any such activities are subject to approval by the City of Torrance and would require the installation of proper construction area traffic control devices. A traffic control plan would be prepared, applicable permits and clearances would be obtained, and any resulting road damage would be repaired.

Based on information provided in Section 2, Project Description, the most substantial site-generated traffic during construction would be the dump trucks used for importing earthwork material. It is projected that approximately 292,000 cubic yards of earthwork material would be imported over a period of 96 working days, which equates to an average of 3,042 cubic yards of imported material per day. As the typical capacity of a dump truck is 15 cubic yards, the import activities would generate an average of 203 truck trips per day and 25 truck trips per hour for an eight-hour working day.

Although this level of truck traffic would be noticeable, vehicles would use designated truck routes, the truck volumes are relatively low compared to the existing traffic volumes on the roadways in the Project area, and the impacts would be temporary. Similarly, construction traffic would not interfere with transit, bicycle, or pedestrian facilities or operations because of the separation of truck traffic from these facilities and the relatively low volume attributable to the Project.

Prior to Project implementation, the Applicant would coordinate with the City of Torrance Public Works Department regarding the access driveways and all potential haul routes, as required under the TMC. Any required restrictions to ensure compliance with safety standards during construction would also be identified. As a result of the advance coordination and restrictions, impacts to the safety, design, and operation of the public road system from construction of the proposed Project would be substantially reduced.

Based on a review of the goals, objectives, and policies of the Circulation and Infrastructure Element of the City of Torrance General Plan (City of Torrance, 2010), construction of the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT WITH MITIGATION. This section summarizes the analysis of the proposed Project's impacts on study area traffic/transportation conditions. First is a discussion of Project generated traffic volumes. Then the impacts associated with non-motorized transportation (pedestrians and bicycles) and public transit are presented along with the findings relative to the impacts associated with Threshold TRA-1.

Traffic Impacts

The anticipated volumes of traffic that would be generated by each component of the Project were calculated by using trip generation rates from the Institute of Transportation Engineers' *Trip Generation Manual* (Institute of Transportation Engineers, 2021).

The anticipated volumes of traffic that would be generated by the proposed Project are shown in Table 4.8-3 for the AM peak hour, the PM peak hour, and an average day. The Project generated traffic volumes shown in the table are representative of both Option 1 – Single Tenant Building and Option 2 – Multi-Tenant Building.

Table 4.8-3. Project Generated Traffic

Proposed Land Use	AM Peak Hour			PM Peak Hour			Daily Traffic
	In	Out	Total	In	Out	Total	
High-Cube Fulfillment (362,7630 sf)							
Passenger Cars	252	56	308	166	262	428	2,268
2-axle Trucks	1	0	1	1	0	1	12
3-axle Trucks	1	1	2	1	1	2	14
4+ -axle Trucks	2	2	4	2	2	4	44
Total Trips	256	59	315	170	265	435	2,338
High-Cube Cold Storage (40,303 sf)							
Passenger Cars	3	0	3	1	3	4	56
2-axle Trucks	0	0	0	0	0	0	10
3-axle Trucks	0	0	0	0	0	0	4
4+ -axle Trucks	0	0	0	0	0	0	16
Total Trips	3	0	3	1	3	4	86
Project Total							
Passenger Cars	255	56	311	167	265	432	2,324
Trucks	4	3	7	4	3	7	100
Total Trips	259	59	318	171	268	439	2,424

Note: sf = square feet; 4+ = four or more

Table 4.8-3 indicates that the Project would generate 318 vehicle trips during the AM peak hour (259 inbound and 59 outbound), 439 trips during the PM peak hour (171 inbound and 268 outbound) and 2,424 trips per day.

Non-Motorized Transportation and Transit

The proposed Project would generate a minor demand for non-motorized travel as some employees would commute to and from the facility as pedestrians or on bicycles. The streets adjacent to the Project site and throughout the study area have sidewalks on both sides of the street (except for Del Amo

Boulevard east of the Project site to Crenshaw Boulevard) and the signalized intersections are all equipped with painted crosswalks and traffic signals with pedestrian crossing phases.

Bike lanes are in place on 190th Street west of Prairie Avenue and on Torrance Boulevard. Prairie Avenue, Madrona Avenue, 190th Street east of Prairie Avenue, and Del Amo Boulevard west of Prairie Avenue are designated as bike routes with signs.

With regard to public transit, Torrance Transit operates several bus routes in the vicinity of the Project site. The route most likely to be used by employees would be Line 6, which runs along Prairie Avenue adjacent to the Project site, Madrona Avenue south of the Project site, and 190th Street north of the Project site. Bus stops for Line 6 are located at the intersection of Prairie Avenue/Madrona Avenue at Del Amo Boulevard near the southwest corner of the Project site.

The proposed Project would not adversely affect the performance of these transit or non-motorized transportation facilities as it is anticipated that the number of employees commuting to and from the site as pedestrians, bicyclists, and/or transit patrons would be minor.

Findings for Impact TRA-1

Based on the transportation analysis, the operation and maintenance of the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

Impact TRA-2: Conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b) regarding vehicle miles traveled.

Construction

LESS THAN SIGNIFICANT. A detailed VMT analysis was conducted for the proposed Project by Urban Crossroads to evaluate the impacts of the Project on VMT (Urban Crossroads, 2025), and is provided in Appendix N. The VMT analysis was developed based on the City of Torrance's *Traffic Impact Assessment Guidelines for Land Use Projects* (City of Torrance, 2021). The City's guidelines focus on long-term operational VMT as opposed to VMT during construction. This is because the State of California requirements for VMT analyses addresses long-range impacts for the year 2030 and beyond, which would not be affected by temporary construction activities. As such, construction-related VMT was not included in the transportation analysis, which is consistent with both City and State requirements for VMT analysis. Given that VMT generated by Project construction would be temporary, impacts would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT. A detailed VMT analysis was conducted for the proposed Project by Urban Crossroads to evaluate the impacts of the Project on VMT (Urban Crossroads, 2025), and is provided in Appendix N. The VMT analysis was developed based on the City of Torrance's *Traffic Impact Assessment Guidelines for Land Use Projects* (City of Torrance, 2021).

The City's guidelines identify the SCAG trip-based transportation model as the preferred tool for conducting a VMT analysis for land use projects. The model considers the interaction between different land uses based on socio-economic data such as population, households, and employment. The calculation of VMT for land use projects is based on the number of trips generated and the average trip length of each vehicle type.

The City guidelines state that for industrial projects, the appropriate VMT metric for evaluation purposes is VMT per employee and that the analysis should be based on the net increase in total VMT for Los Angeles County for the without and with Project scenarios.

To conduct the VMT analysis, adjustments in socio-economic data (employment) were made to the appropriate traffic analysis zone within the SCAG model to reflect the Project's proposed land use and estimated number of employees (255). The total VMT was calculated for Los Angeles County for the without and with Project scenarios for existing conditions and for the future (2040) conditions scenario. The VMT results from the SCAG model are shown in Table 4.8-4. As shown, the total VMT for Los Angeles County was reduced as a result of the Project.

Table 4.8-4. VMT Impacts

Region	No Project	With Project	Net Change in VMT	Net % Change in VMT
Existing Baseline Conditions				
Los Angeles County	450,979,123	450,806,485	-172,638	-0.038%
Future (2040) Conditions				
Los Angeles County	519,112,681	519,198,250	-25,430	-0.005%

Source: Urban Crossroads, 2025 (Appendix N)

Note: VMT = vehicle miles traveled; % = percent

The slight reduction in total VMT associated with the Project is because the proposed use introduces a new employment land use in a predominantly vacant area of Torrance, which improves the balance between origins and destinations within the region and leads to an overall reduction in average trip lengths for employees. As a result, the Project is expected to result in a less than significant impact on VMT.

Impact TRA-3: Substantially increase hazards due to a geometric design feature or incompatible uses.

Construction

LESS THAN SIGNIFICANT. Construction of the proposed Project would not provide any on- or off-site access or circulation features that would create or increase any design hazards or incompatible uses. Access to the Project site would be provided by an existing driveway on Del Amo Boulevard and potentially new temporary driveways on Prairie Avenue and Del Amo Boulevard. The design of the new driveways would be subject to review and approval by City of Torrance staff in accordance with the TMC. Trucks traveling to and from the Project site to deliver imported fill material, equipment, and supplies and to remove exported and remediation material would use designated truck routes and would avoid traveling on local, non-truck routes.

The increased levels of traffic and the increased number of vehicular turning movements that would occur at the driveways and at the nearby intersections would result in an increased number of traffic conflicts and a corresponding increase in the probability of an accident occurring. However, the streets, intersections, and driveways are designed or will be designed to accommodate the anticipated levels of vehicular activity. As the existing roadway network could readily accommodate the anticipated increase in vehicular traffic, the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, impacts would be less than significant.

Operations and Maintenance

LESS THAN SIGNIFICANT. Operation and maintenance of the proposed Project would not provide any on- or off-site access or circulation features that would create or increase any design hazards or incompatible uses. Access to the Project site would be provided by two driveways on Del Amo Boulevard and one driveway on Prairie Avenue. The east driveway on Del Amo Boulevard would become the north leg of the existing Del Amo Boulevard/Maple Avenue intersection, which is signalized. The traffic signal would be modified so that the signal would serve the north leg of the intersection, which would be the new driveway. The west driveway on Del Amo Boulevard and the driveway on Prairie Avenue would accommodate

only right turns into and out of the Project site because existing medians on these roadways prevent left turn movements. The design of the new driveways would be subject to review and approval by City of Torrance staff. Trucks traveling to and from the Project site would use designated truck routes and would avoid traveling on local, non-truck routes, as well as roadways within residential neighborhoods, consistent with the Attorney General Office's Bureau of Environmental Justice guidance document that contains best practices for warehouse projects (Department of Justice, 2022).

The increased levels of traffic and the increased number of vehicular turning movements that would occur at the driveways and at the nearby intersections would result in an increased number of traffic conflicts and a corresponding increase in the probability of an accident occurring. However, the streets, intersections, and driveways are designed or will be designed to accommodate the anticipated levels of vehicular activity. As the existing roadway network could readily accommodate the anticipated increase in vehicular traffic, the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, impacts would be less than significant.

Impact TRA-4: Result in inadequate emergency access.

Construction

NO IMPACT. Emergency access to the Project site would be provided by an existing driveway on Del Amo Boulevard and potentially new temporary driveways on Prairie Avenue and Del Amo Boulevard. The proposed access features at the Project site, including the driveways, parking areas, and on-site circulation routes, would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The driveways are subject to and must satisfy the City's design requirements and would be subject to approval by City staff in accordance with the TMC. Emergency vehicles could readily access the Project site via the driveways and on-site travel corridors. Construction of the proposed Project would not, therefore, result in inadequate emergency access and no impact would occur.

Operations and Maintenance

NO IMPACT. Emergency access to the Project site would be provided by two driveways on Del Amo Boulevard and one driveway on Prairie Avenue. The east driveway on Del Amo Boulevard would become the north leg of the existing Del Amo Boulevard/Maple Avenue intersection, which is signalized. The traffic signal would be modified so that the signal would serve the north leg of the intersection, which would be the new driveway. The west driveway on Del Amo Boulevard and the driveway on Prairie Avenue would accommodate only right turns into and out of the Project site because existing medians on these roadways prevent left turn movements. The proposed access features at the Project site, including the driveways, parking lots, and on-site circulation routes, would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The driveways are subject to and must satisfy the City's design requirements and would be subject to approval by City staff in accordance with the TMC. Emergency vehicles could readily access the Project site via the driveways and on-site travel corridors. Operation and maintenance of the proposed Project would not, therefore, result in inadequate emergency access.

4.8.3.3. Mitigation Measures

Mitigation measures would not be required.

4.8.4. Cumulative Impact Analysis

Geographic Extent/Context

The geographic extent of this analysis includes the roadways listed in Table 4.8-1, Study Area Roadways, and the intersections listed in Table 4.8-2, Study Area Intersections.

Cumulative Impact Analysis

Other proposed development projects in the City of Torrance that were addressed in the transportation analysis include the following:

- Map No. 1: CUP20-01003 – Comstock Development – 2555 West 190th Street – Light Industrial Warehouse – 291,000 square feet
- Map No. 3: CUP22-00012 – Torrance Commerce Center Project – 2281 205th Street – Light Industrial Warehouse – 132,425 square feet
- Map No. 4: CUP23-00009 – Torrance Gateway North – Light Industrial Buildings – 181,554 square feet
- Map No. 7: CUP23-00019 – Link Logistics – Light Industrial Warehouse – 143,987 square feet
- Map No. 10: CUP24-00012 – Sequoia Development Center – Light Industrial Buildings – 284,887 square feet
- Map No. 13: CUP23-00008 – 1899 Western Way – Light Industrial Warehouse – 32,160 square feet
- Map No. 14: CUP22-00019/MOD22-00006 – Automatic Carwash/Electric Charging (Rove) – 40 stations
- Map No. 15: CUP21-00022 – SRG Phase III – Light Industrial Warehouse – 730,000 square feet

Construction of the proposed Project would have the potential for temporary impacts on traffic volumes, road hazards, and emergency access. Use of local roads for the transport of construction equipment and construction personnel would increase traffic slightly but would be temporary and short-term and would not exceed existing capacities. Impacts from the proposed Project, combined with construction of the cumulative projects would have the potential to cumulatively impact transportation and traffic in the surrounding area; however, the construction schedules of the Projects and that of the proposed Project would be variable. The potential for the planned and current Projects in the vicinity to require the maximum amount of truck volumes all at the same time would be a remote possibility, and would be limited in duration and location.

Additionally, prior to Project implementation, the Applicant would coordinate with the City of Torrance Public Works Department regarding the access driveways and all potential haul routes, as required under the TMC. Any required restrictions to ensure compliance with safety standards during construction would also be identified. Each of the planned and current projects listed above would also be subject to the TMC and safety standards. As a result of the advance coordination and restrictions, impacts to the safety, design, and operation of the public road system from construction of the proposed Project and the listed planned and current projects would be substantially reduced.

Therefore, the cumulative transportation impacts associated with these development projects would be less than significant.

4.8.5. Summary of Significance Findings

Table 4.8-5 provides a summary of each identified transportation/traffic impact and associated mitigation measures to reduce or avoid the impact (where warranted). Mitigation measures are required for each significant impact but are not required for impacts that are not significant.

Table 4.8-5. Summary of Transportation Impacts and Mitigation Measures

Impacts	Mitigation Measures
Impact TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact TRA-2: Conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b) regarding vehicle miles traveled.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact TRA-3: Substantially increase hazards due to a geometric design feature or incompatible uses.	
Construction – Less Than Significant	No mitigation measures are required.
Operations & Maintenance – Less Than Significant	No mitigation measures are required.
Impact TRA-4: Result in inadequate emergency access.	
Construction – No Impact	No mitigation measures are required.
Operations & Maintenance – No Impact	No mitigation measures are required.

4.9. Tribal Cultural Resources

This section provides information on Tribal Cultural Resources (TCRs), which are a defined class of resources under Public Resources Code (PRC) Section 21074. TCRs include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a California Native American Tribe. To qualify as a TCR, the resource must either: (1) be listed on, or be eligible for listing on, the California Register of Historical Resources (CRHR) or other local historic register as defined in PRC Section 5020.1 subdivision (k); or (2) be a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria outlined in subdivision (c) of Section 5024.1, the lead agency shall consider the significance of a resource to a California Native American tribe. A resource may constitute a Tribal Cultural Resource (TCR) if the lead agency, at its discretion and supported by substantial evidence, determines that it should be treated as such (Public Resources Code [PRC] §21074[a][2]). Native American tribes that are traditionally and culturally affiliated with a geographic area can provide lead agencies with expert knowledge of TCRs.

Assembly Bill (AB) 52 (Gatto) requires that the CEQA Lead Agency send a formal notice and invitation to consult about a proposed project to all California Native American tribes traditionally and culturally affiliated with the geographic area of the proposed project. The purpose of this consultation is to obtain tribal information and direction related to the potential significant effects on TCRs that may result from a project (PCR section 21080.3.1(d)). Consultation must include discussion of specific topics or concerns identified by Tribes. This section describes the AB 52 consultation process, the results of that process, and potential impacts of the proposed Project related to TCRs.

The following discussion is based on the Cultural Resources Study prepared by Brian F. Smith and Associates (Garrison & Smith, 2021) for the Project and included in Appendix F, unless otherwise referenced, and the results of formal AB 52 consultation that was conducted for the proposed Project. The proposed Project's potential effects on TCRs were evaluated using the criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are discussed in more detail in Section 4.9.3.3, Environmental Impact Analysis. The analysis concludes that the proposed Project impacts associated with TCRs would be less than significant with mitigation.

No scoping comments were received regarding TCRs during the public scoping period for the proposed Project.

4.9.1. Environmental Setting

4.9.1.1. General Site Conditions

The Project site is situated on approximately 31.3 acres in the southwestern portion of Los Angeles County, within the jurisdiction of the City of Torrance. Topographically, the site exhibits gently rolling terrain in the western region and transitions to a relatively flat mesa in the eastern region, with ground surface elevations ranging from approximately 55 to 90 feet above mean sea level. The site is located within the Central Basin, a sub-basin of the larger Los Angeles Basin, a structural and sedimentary geologic feature influenced by numerous active fault systems in the metropolitan area.

The underlying geologic materials predominantly consist of Quaternary-aged (the last 2.6 million years to the present day) (late to middle Pleistocene or roughly 1.2 million years to 11,700 years ago) old eolian deposits,⁴³ with a minor extent of Quaternary (middle to late Pleistocene or roughly the last 300,000 to

⁴³ Old eolian deposits are ancient accumulations of sediment (sand and silt) that were originally transported and deposited by wind, such as dunes. Over long periods, these deposits become cemented and lithified into sandstone and other sedimentary rock, and they can be found interbedded with non-eolian deposits in the geologic record.

11,700 years ago) old alluvium⁴⁴ present in the northeastern portion of the site. Surface soils include Urban land-Marina complex with 0 to 5 percent slopes, and Urban land-Centinela-Typic Xerorthents, fine substratum complex with 0 to 2 percent slopes, consistent with disturbed or developed urban settings.

Vegetative cover across the Project site is primarily composed of non-native herbaceous species, including ruderal grasses⁴⁵ and invasive weed species.⁴⁶ Ice plant is prevalent along the site perimeter, while scattered ornamental tree species such as pepper, palm, and eucalyptus are distributed throughout the site. Isolated patches of riparian and coastal sage scrub vegetation are present in the western portion, though these are limited in extent and fragmented.

The site would have supported a range of terrestrial resources utilized by Indigenous populations. Native fauna likely included small to medium-sized mammals (e.g., rabbits, squirrels, gophers, rodents, deer, coyotes), as well as various reptiles and amphibians. The local environment would have provided a diverse subsistence resource base, with freshwater likely accessible via ephemeral drainages and the San Gabriel River to the east. The nearby Pacific coastline, located west of the site, would have served as a supplementary source of marine-based resources.

4.9.1.2. Regional Archaeological Context

The regional archaeological context for the proposed Project, including the precontact context and ethnographic context, is described in Section 4.3, Cultural Resources.

4.9.1.3. TCR Data Collection

As discussed in Section 4.3, Cultural Resources, a records search, background research, pedestrian survey, and Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search were conducted for the proposed Project (Garrison & Smith, 2021; Appendix F). No TCRs were identified during the background research or pedestrian survey. The results of these data collection efforts are discussed further in Section 4.3 of this EIR.

4.9.1.4. Summary of AB 52 Tribal Consultation

Information presented in this section was gathered through formal AB 52 consultation between the City of Torrance and California Native American Tribes that have traditional and cultural affiliations with the Project area.

Government-to-government tribal consultation was conducted between the City and representatives of Native American tribes identified by the NAHC. Letters including information about the proposed Project, location map, and an invitation to consult regarding the proposed Project were mailed via United States Postal Service certified mail on November 30, 2022. Letters were sent to the following tribes:

- Gabrieliño Band of Mission Indians – Kizh Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseño Indians

⁴⁴ Alluvium is the collective term for unconsolidated material—like clay, silt, sand, and gravel—transported and deposited by rivers and streams, resulting in alluvial deposits on floodplains, deltas, and stream beds.

⁴⁵ Ruderal grasses are pioneer plants that colonize disturbed areas with poor or compacted soils, such as abandoned lots, along sidewalks, or after natural disasters like fires and floods.

⁴⁶ An invasive weed is a non-native plant species (plants that do not naturally occur in a specific ecosystem and are introduced by human activity) that spreads aggressively.

Of the above listed tribes, the Gabrieliño Band of Mission Indians – Kizh Nation (Kizh Nation) requested formal consultation by email on January 3, 2023, and recommended mitigation measures for this Project. The City agreed to the proposed mitigation measures, which are incorporated into this analysis, and formal AB 52 consultation was concluded on January 12, 2023.

Following a two-year suspension of Project activities, the City of Torrance reinitiated the proposed Project in March of 2023 with some slight design changes. Because of the time lapse and minor Project changes, the City re-engaged with the Kizh Nation in April of 2025 to confirm the adequacy of the previously recommended mitigation measures for TCRs.

During this consultation, the Kizh Nation reviewed the mitigation framework and requested minor revisions to the language to ensure that the measures remained culturally appropriate and protective of potential resources. The City concurred with these proposed modifications, and the mitigation measures presented in this section reflect the updated language and conditions as agreed upon by both parties.

4.9.2. Applicable Regulations, Policies, and Standards

4.9.2.1. State

AB 52 – Tribal Cultural Resources

AB 52, enacted in 2014 and effective as of July 1, 2015, amended CEQA to establish TCRs as a distinct category of resources and requires lead agencies to consult with California Native American tribes early in the environmental review process.

Under AB 52, a project that is subject to CEQA and may cause a substantial adverse change to a TCR is considered to have a potentially significant impact on the environment. A TCR is defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is either:

- Listed or eligible for listing in the CRHR⁴⁷ or a local historic register; or
- A resource that the lead agency, at its discretion, chooses to treat as a TCR based on substantial evidence.

Lead agencies are required to provide written notification to tribes that have requested notification of proposed projects in the geographic area traditionally and culturally affiliated with the tribe. This notification must occur within 14 days of determining that an application is complete or that the agency will undertake a project.

If a tribe responds within 30 days of receiving notification and requests consultation, the lead agency must initiate consultation with the tribe. The purpose of consultation is to identify TCRs that may be affected by the project, evaluate the significance of any potential impacts, and develop appropriate mitigation measures if necessary.

4.9.2.2. Local

Torrance Municipal Code (TMC)

The Historic Preservation Commission, established by TMC Chapter 13.21, oversees the identification and evaluation of cultural and historic resources in the City (City of Torrance, 2023). Although TCRs are not specifically addressed in the TMC, the Commission supports broader cultural resource protections that may encompass TCRs.

Chapter 92.34.2 – Zoning Code requires that projects be consistent with the Torrance General Plan, including goals related to cultural conservation (City of Torrance, 2023).

⁴⁷ The CRHR serves as an authoritative guide for identifying California's significant historical and archaeological resources by providing criteria to determine if resources are eligible for protection.

City of Torrance General Plan – Community Resources Element

The Community Resources Element of the Torrance General Plan identifies the need to preserve significant archaeological, cultural, and historical resources. Section 3.4 – Cultural and Tribal Cultural Resources supports compliance with CEQA and AB 52 through proactive consultation, site avoidance, and resource protection (City of Torrance, 2010).

City of Torrance Historic Preservation Ordinance

The City's Historic Preservation Ordinance (Ord. No. 3822) provides the framework for identifying and preserving local historic resources and supports CEQA-compliant protections, including those that may apply to TCRs if deemed significant (City of Torrance, 1989).

4.9.3. Environmental Impacts Analysis and Mitigation

4.9.3.1. Impact Analysis Approach

Impacts to TCRs can be measured as direct and/or indirect and must be significant enough to cause a substantial adverse change in the significance of these resources. The direct impacts of construction to TCRs can include immediate physical alterations, damage, or destruction of all or a part of a resource; or demolition or material alteration in an adverse manner of those physical characteristics of a resource that convey its significance. In contrast, indirect impacts are effects that are often caused by visual, noise, vibration, or setting changes that would cause a substantial adverse change in the significance of a cultural resource. Information from record searches and the pedestrian survey were compared to significance criteria in Section 4.9.3.2 below to assess whether proposed Project construction and operational activities would adversely impact any known significant cultural resources.

4.9.3.2. Significance Criteria

Project impacts related to TCRs were evaluated against the CEQA significance criteria and are discussed in the following sections. The impact analysis evaluates potential proposed Project impacts during the construction phase and the operation and maintenance phase. The significance criteria listed below are based on Appendix G of the CEQA Guidelines.

Would the proposed Project:

- Cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,
 - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1? In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance to a California Native American tribe.

In making a finding that a resource is a TCR, the City may consider, among other evidence, elder testimony, oral history, tribal archival information, testimony of an archaeologist or other expert certified by the tribe, official declarations or resolutions adopted by the tribe, formal statements by the tribe's historic preservation officer, or other historical notes and anthropological records (OPR, 2017).

Adverse changes are considered, but not limited to, the following:

- Physical, visual, or audible disturbances resulting from construction and development that would affect the integrity of a resource or the qualities that make it eligible for the CRHR;
- Exposure of resources to vandalism or unauthorized collecting;
- A substantial increase in the potential for erosion or other natural processes that could affect resources; or
- Neglect of a resource that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious or cultural significance to a Native American tribe.

4.9.3.3. Environmental Impact Analysis

As described in Section 2, Project Description, the proposed Project would include developing a Class A industrial warehouse building, including 15,000 square feet of office space on 31.3 acres of currently vacant land. The proposed Project would allow for industrial uses, including warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage. The proposed Project also includes future road improvements (including installation of a sewer line) along Prairie Avenue, Del Amo Boulevard, Maple Avenue, and Oregon Court, totaling an additional 7.79 acres.

Impact TCR-1: Cause a substantial adverse change in the significance of a Tribal Cultural Resource.

Construction

LESS THAN SIGNIFICANT WITH MITIGATION. As discussed above, no TCRs were identified during the background research, through AB 52 consultation, or during the pedestrian survey; therefore, the Project would not cause a substantial adverse change in the significance of a known TCR.

As with any project involving ground disturbing activity, there is the potential to encounter unknown buried resources. As recommended by the Kizh Nation, Mitigation Measure (MM) TCR-1a requires the Applicant to retain and compensate a tribal monitor from the Kizh Nation to be present during all ground disturbing activities. MM TCR-1b grants the tribal representative stop work authority of a 50-foot buffer and establishes procedures for treatment plans of unanticipated discoveries. MM TCR-1c and MM TCR-1d outline the procedures for the unanticipated discovery of human remains or grave goods, including notification of the County Coroner and NAHC, as well as procedures for establishing treatment plans of the remains and goods. With implementation of MM TCR-1a through MM TCR-1d, impacts to unknown buried resources would be less than significant.

Operations and Maintenance

NO IMPACT. No ground disturbance is proposed as part of general operations and maintenance. Therefore, Project operations would not cause a substantial adverse change to a TCR.

Impact TCR-2: Cause a substantial adverse change in the significance of a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, and that is a Tribal Cultural Resource identified by a California Native American tribe.

Construction

LESS THAN SIGNIFICANT WITH MITIGATION. As discussed above, no TCRs were identified during background research, through AB 52 consultation, or during the pedestrian survey. Therefore, the Project would not cause a substantial adverse change in the significance of a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1, and that the resource is a TCR identified by a California Native American tribe.

As with any project involving ground disturbing activity, there is the potential to encounter unknown buried resources. As recommended by the Kizh Nation, MM TCR-1a requires the Applicant to retain a tribal monitor from the Kizh Nation to be present during all ground disturbing activities. MM TCR-1b grants the tribal representative stop work authority of a 50-foot buffer and establishes procedures for treatment plans of unanticipated discoveries. MM TCR-1c and MM TCR-1d outline the procedures for the unanticipated discovery of human remains or grave goods, including notification of the County Coroner and NAHC, as well as procedures for establishing treatment plans of the remains and goods. With implementation of MM TCR-1a through MM TCR-1d, impacts to unknown buried resources would be less than significant.

Operations and Maintenance

NO IMPACT. No ground disturbance is proposed as part of general operations and maintenance. Therefore, Project operations would not cause a substantial adverse change to a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1, and that is a TCR identified by a California Native American tribe.

4.9.3.4. Mitigation Measures

TCR-1a Retention of Tribal Monitor. Prior to the issuance of a demolition permit for the Project, the Applicant shall retain, at its cost, a Native American Monitor from the Gabrieliño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe). The Native American Monitor shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project (collectively “ground disturbing activities”). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Applicant shall prepare a monitoring agreement with the Kizh Nation that outlines the roles and responsibilities of the Native American Monitor and shall submit this agreement to the City prior to the issuance of a demolition permit for the Project.

Prior to commencement of ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify Tribal Cultural Resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor is not present at the Project Site on any given workday, ground disturbing activities may continue if the workers involved in such activities attended the training session.

Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting Tribal Cultural Resources. Native American monitoring shall conclude no later than the conclusion of ground disturbing activities.

The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground disturbing activities, the type of construction activities performed, locations of ground disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered Tribal Cultural Resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and

burial goods. Copies of monitor logs shall be provided to the Applicant and the City upon written request to the Tribe. The Applicant shall not be deemed to be out of compliance with this measure if the Native American Monitor fails to complete or submit any such monitoring logs.

TCR-1b

Unanticipated Discovery of Tribal Cultural Resources. In the event of a discovery of potential Tribal Cultural Resources at the Project site, Native American Monitor (after consultation with the Applicant) shall have the authority to temporarily divert, redirect, or halt ground disturbing activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor, the Applicant shall establish an appropriate buffer area of at least 50 feet in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Tribe, and the City to discuss the significance of the find and whether it qualifies as a Tribal Cultural Resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe and the Applicant, the City determines, based on substantial evidence, that the resource is in fact a Tribal Cultural Resource, the Applicant shall develop a reasonable and feasible treatment plan, with input from the Tribe, and with the concurrence of the City. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources.

If the Tribe does not accept a particular recommendation determined to be reasonable and feasible by the Applicant (including, but not limited to, the size of the buffer set forth above), the Tribe may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Applicant; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a Tribal Cultural Resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to Tribal Cultural Resources. The Applicant shall pay all costs and fees associated with the mediator.

The Applicant may recommence ground disturbing activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs. The recovered Native American resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes, or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Tribe nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

TCR-1c **Unanticipated Discovery of Human Remains and Grave Goods.** Upon any discovery of human remains and grave goods directly associated with such human remains (Associated Grave Goods), the Tribal Monitor and Applicant will immediately divert work at a minimum of 50 feet and place an exclusion zone around the burial. The Applicant will then notify the Tribe and call the coroner. Work will continue to be diverted until the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner, as mandated by state law, will notify the NAHC, who will then appoint a Most Likely Descendent (MLD).

TCR-1d **MLD Recommendations for Unanticipated Discovery of Human Remains and Grave Goods.** The MLD may make recommendations to the Applicant for means of treating or disposing of, with appropriate dignity, the human remains and any Associated Grave Goods as provided in Public Resources Code Section 5097.98. The Applicant shall discuss and confer with the MLD all reasonable options regarding the preferences for treatment. The preferences of the MLD for treatment may include the following:

- The nondestructive removal and analysis of human remains and Associated Grave Goods.
- Preservation of Native American human remains and Associated Grave Goods in place.
- Relinquishment of Native American human remains and Associated Grave Goods to the MLD for treatment.
- Other culturally appropriate treatment.

Where the following conditions occur, the Applicant or authorized representative shall rebury the Native American human remains and Associated Grave Goods with appropriate dignity on the property in a location not subject to further subsurface disturbance as determined by the Applicant:

- The NAHC is unable to identify an MLD or the identified MLD fails to make a recommendation within 24 hours after being notified by the NAHC.
- The Applicant or its authorized representative rejects the recommendation of the MLD and the mediation by the NAHC pursuant to Public Resources Code Section 5097.94(k) fails to provide measures acceptable to the Applicant.

In the event that preservation of the human remains and Associated Grave Goods in place is not feasible, the Applicant shall arrange a designated location within the Project Site with appropriate dignity. For the purposes of this Agreement, a location of appropriate dignity on the Project Site includes a location that is buried at a sufficient depth and buried in a such a manner as to ensure that the site is not subject to further subsurface disturbance as determined by the Applicant with input from the MLD. Such location may be under any Project construction or contemplated Project construction as determined by the Applicant. In the event that the Applicant and the MLD agree to a location within the Project Site, the Applicant shall do one or more of the following to protect the location:

- Record the site with the NAHC or the appropriate Information Center;
- Utilize a conservation zoning designation or easement;
- To the extent allowed by law, record a document with the County of Los Angeles entitled "Notice of Reinterment of Native American Remains," which shall include a legal description of the property, the name of the Applicant, and the Applicant's acknowledged signature, in addition to any other information required by this section. The document shall be indexed as a notice under the name of the Applicant.

If the Applicant and MLD cannot agree to a feasible location within the Project Site, the MLD shall take possession of the human remains for appropriate off-site treatment, as determined by the MLD.

4.9.4. Cumulative Impact Analysis

Geographic Extent/Context

The geographic extent of this analysis is approximately 5 miles from the Project site. This geographic scope is appropriate because the cultural resources within this area are expected to be similar to those that occur on the Project site. Their proximity and similarity in environments would result in similar land-use, and thus, site types. Cumulative impacts could occur if other projects, in conjunction with the proposed Project, would have impacts on TCRs that, when considered together, would be significant.

Cumulative Impact Analysis

As identified in Section 3, Table 3.1, cumulative projects that are within the geographic extent for TCRs include cumulative projects ID 1, 3, 4, 5, 7, 8, 9, 10, 11, 12, and 13. These projects all likely involve ground disturbing activity to some degree that have the potential to impact buried Tribal Cultural Resources, and it is assumed that each project would implement similar inadvertent discovery mitigation measures to reduce impacts to buried unknown resources. The Project would require implementation of MM TCR-1a through MM TCR-1d, which would lessen the overall impact to unknown buried TCRs. Therefore, the Project would not result in a cumulatively considerable contribution to impacts on TCRs.

4.9.5. Summary of Significance Findings

Table 4.9-1 provides a summary of each identified Tribal Cultural resource impact and associated mitigation measures to reduce or avoid the impact (where warranted). Mitigation measures are required for each significant impact but are not required for impacts that are not significant.

Table 4.9-1. Summary of Tribal Cultural Resources Impacts and Mitigation Measures

Impacts	Mitigation Measures
Impact TCR-1: Cause a substantial adverse change in the significance of a Tribal Cultural Resource.	
Construction – Less Than Significant with Mitigation	TCR-1a: Retention of Tribal Monitor TCR-1b: Unanticipated Discovery of a Tribal Cultural Resource TCR-1c: Unanticipated Discovery of Human Remains and Grave Goods TCR-1d: MLD Recommendations for Unanticipated Discovery of Human Remains and Grave Goods
Operations & Maintenance – No Impact	No mitigation measures are required.
Impact TCR-2: Cause a substantial adverse change in the significance of a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, and that is a Tribal Cultural Resource identified by a California Native American tribe.	
Construction – Less Than Significant with Mitigation	TCR-1a: Retention of Tribal Monitor TCR-1b: Unanticipated Discovery of a Tribal Cultural Resource TCR-1c: Unanticipated Discovery of Human Remains and Grave Goods TCR-1d: MLD Recommendations for Unanticipated Discovery of Human Remains and Grave Goods
Operations & Maintenance – No Impact	No mitigation measures are required.

5. ALTERNATIVES ANALYSIS

5.1. Introduction

CEQA Guidelines Section 15126.6 (a) states that an EIR shall describe a reasonable range of alternatives to a project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.

The CEQA Guidelines require an EIR to evaluate the comparative merits of the alternatives it has selected for analysis and provide sufficient information about each alternative to compare it with the proposed Project. An EIR should explain how the project alternatives were selected for analysis as well as identifying the alternatives that were rejected as infeasible and briefly explaining why they were rejected (CEQA Guidelines Section 15126.6(a), (c), (d)). The CEQA Guidelines state that the discussion of alternatives shall focus on alternatives capable of eliminating or reducing significant adverse environmental effects of a project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. However, the CEQA Guidelines provide that an EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote or speculative.

To comply with CEQA's requirements, each alternative that was initially identified for the proposed Project was evaluated in three ways:

- Does the alternative meet most of the basic project objectives?
- Is the alternative potentially feasible (from economic, environmental, legal, social, and technological standpoints)?
- Does the alternative avoid or substantially lessen any significant effects of the proposed Project, including consideration of whether the alternative itself could create significant environmental effects potentially greater than those of the proposed Project?

5.2. Alternatives Screening Methodology

Alternatives were evaluated using a screening process that consisted of three steps:

- *Step 1:* Clearly define each alternative to allow comparative evaluation.
- *Step 2:* Evaluate each alternative in comparison with the proposed Project using CEQA criteria (defined below).
- *Step 3:* Based on the results of Step 2, determine the suitability of each alternative for full analysis in the EIR by looking at whether the alternative: (1) achieves all or most of the project's objectives, (2) is potentially feasible, and (3) avoids or substantially lessens a significant environmental impact of the project as proposed. If the alternative does not meet these criteria, eliminate it from further consideration.

Infeasible alternatives and alternatives that did not offer any overall environmental advantage (i.e., the alternative either did not reduce or avoid one or more of the proposed Project's significant effects or if it did, other effects were significantly increased) were removed from further consideration and analysis. Following the screening process, the advantages and disadvantages of the remaining alternatives were carefully weighed with respect to CEQA's criteria for consideration of alternatives.

5.2.1. Project Objectives

The following is a list of specific objectives that the proposed Project is intended to achieve.

- A. Develop an industrial project on the Project site in conformance with the applicable goals, objectives, and policies of the Torrance General Plan that is compatible with adjoining land uses;
- B. Efficiently develop an underutilized property with industrial uses in proximity to regional highways (I-405 and I-110) to help meet regional demands for goods movement facilities;
- C. Expand economic development and facilitate job creation in the City of Torrance by establishing new industrial development adjacent to or near already-established industrial uses;
- D. Maximize new job opportunities within the City of Torrance which improves the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances;
- E. Maximize opportunities for positive economic benefit to the City, including new sales and property tax revenues that can be used for City services;
- F. Develop a Class A, speculative industrial building in Torrance that is designed to meet contemporary industry standards, can accommodate a wide variety of users, and is economically competitive with similar industrial buildings in the local area and region;
- G. Redevelop a property that has access to available infrastructure, including roads and utilities;
- H. Provide a landscaping plan that features drought-tolerant plant materials to provide for an aesthetically pleasing outdoor environment while minimizing the demand for water resources.

5.2.2. Feasibility

The CEQA Guidelines (Section 15364) define feasible as “...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” The alternatives screening analysis is largely governed by what CEQA terms the “rule of reason,” meaning that the analysis should remain focused, not on every possible eventuality, but rather on the alternatives necessary to permit a reasoned choice. Those alternatives that are potentially feasible, meet most of the Project objectives, and would reduce significant impacts of the proposed Project are fully analyzed in the EIR.

According to CEQA Guidelines Section 15126.6(f)(1), among the factors that may be considered when addressing the potential feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or other regulatory limitations, jurisdictional boundaries, and the project proponent’s control over alternative sites. For the screening analysis, the potential feasibility of alternatives was assessed taking the following factors into consideration:

- **Legal Feasibility.** Does the alternative have the potential to avoid lands that have legal protection that may prohibit or substantially limit the feasibility of permitting an industrial development? Lands that are afforded legal protections that would prohibit the construction of the Project, or require an act of Congress for permitting, are considered less feasible locations for the Project. These land use designations include wilderness areas, wilderness study areas, restricted military bases, airports, and Indian reservations. Information on potential legal constraints of each alternative has been compiled from laws, regulations, and local jurisdictions, as well as a review of federal, state, and local agency land management plans and policies.
- **Regulatory Feasibility.** Do regulatory restrictions substantially limit the likelihood of successful permitting of an industrial development? Is the alternative consistent with regulatory standards for industrial development design, operation, and maintenance?

- **Technical Feasibility.** Is the alternative potentially feasible from a technological perspective, considering available technology? Are there any construction, operation, or maintenance constraints that cannot be overcome?
- **Social Feasibility.** Is the alternative inconsistent with an adopted goal or policy of the City of Torrance or other applicable agency?
- **Economic Feasibility.** Is the alternative so costly that implementation would be prohibitive? The CEQA Guidelines require consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may “impede to some degree the attainment of the project objectives, or would be more costly” (CEQA Guidelines Section 15126.6(b)). The Court of Appeals determined in *Citizens of Goleta Valley v. Board of Supervisors* (2nd Dist. 1988) 197 Cal.App.3d 1167, p. 1181 (see also *Kings County Farm Bureau v. City of Hanford* (5th Dist. 1990) 221 Cal.App.3d 692, 736): “[t]he fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.”
- **Environmental Feasibility.** Would implementation of the alternative cause substantially greater environmental damage than the proposed Project, thereby making the alternative clearly inferior from an environmental standpoint?

5.2.3. Ability to Reduce or Avoid Significant Environmental Impacts

The CEQA Guidelines (Section 15126.6(a)) require an EIR to describe a reasonable range of alternatives that have the potential to “avoid or substantially lessen any of the significant effects of the project.”

5.3. Alternatives Eliminated from Further Consideration

5.3.1. Alternative Sites

An alternative that would develop the Project in a different location was not considered further, primarily because the use of an alternative site is considered “remote and speculative” since the Applicant does not have site control of another site. The following discussion further describes the steps taken to consider a location alternative and the rationale for elimination.

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 developing 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 (CEQA Guidelines Section 15126[5][B][1]).

Given the size and type of the proposed development, a similarly sized property elsewhere in the City of Torrance would result in the same or greater project-level and cumulative GHG emissions. There are no significant and unavoidable impacts of the Project, as all significant impacts have been mitigated to a less than significant level. Even though impacts related to regional GHG emissions have been mitigated to less than significant, these impacts relate primarily to mobile emissions during operation and are not site specific. Relocation of the Project would not substantially reduce these impacts, and could cause greater impacts.

Therefore, the analysis of an alternative site for the Project is neither meaningful nor necessary because the impacts resulting from the Project would not be avoided or substantially lessened by its implementation in an alternate location.

The Project proposes to develop an approximately 31.3-acre site with an approximately 403,033 square foot (sf) industrial building. The Project Applicant has ownership and control over the Project site, and the Project site’s location in proximity to State Route 107 (SR-107), SR-213, and Interstate 405 (I-405) provide

direct access to the regional transportation network. The Project is also consistent with the City's General Plan and zoning designation and adjacent existing industrial development.

Similarly, there are no existing, developed sites for sale that are a similar size as the Project site within close proximity to the key freeway infrastructure and that could reasonably be controlled by the Project Applicant for the purpose of developing the Project. Furthermore, the Project Applicant does not hold ownership control over any other adequately sized parcels of land in or near the Project site that could be used as an alternative location for the Project. CEQA does not require sites that are not owned by the landowner or that could not be reasonably acquired by the landowner to be considered as an alternative to the Project.

Therefore, because an alternative location is not available that would avoid or substantially lessen the significant environmental effects of the Project, and because the Project Applicant does not have ownership control over, and cannot reasonably obtain ownership control over, any other parcels of land of adequate size in the jurisdiction of the City that could accommodate the Project, an alternative location is not required to be analyzed. Accordingly, this alternative is not further considered in the Draft EIR.

5.3.2. Alternative Site Plan

An alternative that would develop the Project with a different site plan, which includes building out the Project site, was not considered further because under this alternative, the size of the Project footprint would increase resulting in an increase in impacts as discussed below.

The Project site has a General Plan land use designation of Heavy Industrial (I-HVY) with a max floor area ratio (FAR) of 0.6 and is zoned as Heavy Manufacturing District (M-2). The Project's current FAR is 0.3, which is under the maximum allowed. Over the past several years, the Project Applicant has considered several alternative site plans consistent with the City's General Plan and zoning, including full buildout of the Project site with five warehouse buildings totaling 621,730 square feet. The Alternative Site Plan Alternative considers the development of the Project site with this increase in building square footage consistent with the allowable FAR established under the I-HVY land use and M-2 zoning designations.

As discussed in Section 4-6, Hazards and Hazardous Materials, of this Draft EIR, the Project site was historically used as an out-parcel ancillary to the Torrance Oil Refinery for the placement or disposal of refinery wastes, which constitutes a recognized environmental condition. The Refinery is the subject of Cleanup and Abatement Orders (CAO) from the Los Angeles Regional Water Quality Control Board (LARWQCB) for releases at and from the Refinery (CAO Numbers 88-43, 89-136, and 95-116) and the Project site is also within the area subject to those orders. The northwestern portion of the Project site was primarily used as a disposal area for the refinery waste. Results of the Phase II Environmental Site Assessment concluded that the disposal area contains asbestos-containing materials and other contaminants including Total Petroleum Hydrocarbons (TPH) and Volatile Organic Compounds (VOCs). Remediation would occur on the approximately 9.2-acre disposal area and a Response Plan and Soil Management Plan under the oversight of LARWQCB have been prepared detailing the course of clean up procedures for the soil contamination onsite. The increase in building square footage under the Alternative Site Plan Alternative would increase the building footprint towards the disposal area; thereby increasing impacts related to hazards and hazardous materials. Furthermore, this alternative would increase impacts related to air quality, greenhouse gas emissions, and noise; due to the increase in associated vehicle trips. Accordingly, this alternative is not further considered in the Draft EIR.

5.4. Alternatives Evaluated in this EIR

Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives

of the Project, but which may avoid or substantially lessen any of the significant effects of the Project. These alternatives are analyzed in detail in the following sections.

- Alternative 1: No Project/No Development Alternative
- Alternative 2: Existing Zoning – Professional Office Alternative
- Alternative 3: Manufacturing Use Alternative

5.4.1. Alternative 1: No Project/No Development Alternative

5.4.1.1. Alternative 1 Description

Section 15126.6(e) of the CEQA Guidelines requires that the No Project Alternative be considered to allow decision makers to compare the impacts of approving the proposed Project against the impacts of not approving the proposed Project. CEQA requires a discussion of what would be reasonably expected to occur in the foreseeable future if the Project were not approved. This alternative would leave the Project site in its existing conditions, as described in Section 2, Project Description.

The No Project/No Development Alternative assumes that no development or improvements would occur on the Project site, the entire 31.3-acre site would remain vacant, and the off-site improvements would not occur. Under this alternative, the warehouse building would not be developed and none of the Project's internal parking, utility, and other infrastructure improvements would not occur.

Under this alternative, remediation would still occur, under the oversight of LARWQCB in accordance with the provisions of the California Land Reuse and Revitalization Act (CLRRA) of 2004 under an approved Response Plan and Soil Management Plan (SCS Engineers, 2025a and 2025b; Appendix C).

Objectives. This alternative would not satisfy any of the Project objectives.

Summary of Impacts. The No Project/No Development Alternative would not result in the construction of the proposed warehouse buildings or associated infrastructure, parking and landscaping; therefore, the associated construction activities would be eliminated by selection of the No Project/No Development Alternative. Therefore, air quality, GHG emissions, and noise impacts would be reduced by eliminating fine grading, building construction, paving and architectural coating construction activities. It should be noted that remediation work would continue to occur; albeit may be delayed.

The No Project/No Development Alternative would result in less impacts to all environmental topics except for hydrology and water quality, which would result in greater impacts when compared to the Project. This alternative would not receive the environmental benefits from the implementation of stormwater drainage and water quality filtration features that would be constructed by the Project. As remediation would still occur subject to the Cleanup and Abatement Orders from the LARWQCB, impacts due to the remediation process would be similar to the proposed Project.

5.4.1.2. Environmental Impact Analysis

Air Quality

The No Project/No Development Alternative would not include the construction of a warehouse building at the Project site. However, earth moving activities would still occur for remediation and the use of diesel equipment and vehicle trips could result in air pollutant emissions. Impacts would be similar to but less than the proposed Project and would be less than significant. This alternative's contribution to cumulative impacts would be less than cumulatively considerable.

Biological Resources

The No Project/No Development Alternative would not include any construction or operational activities associated with the proposed warehouse uses. However, ground-disturbing activities would still occur for

remediation of the Project site and could result in direct and indirect impacts to biological resources. As such, implementation of mitigation measures similar to what is proposed for the Project would be required. Impacts would be similar to but less than the proposed Project and would be less than significant with mitigation. This alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures similar to the proposed Project.

Cultural Resources

The No Project/No Development Alternative would not result in any construction or operational activities associated with the proposed warehouse uses. However, ground-disturbing activities would still occur for remediation of the Project site and could result in direct impacts to cultural resources. As such, implementation of mitigation measures similar to what is proposed for the Project would be required. Impacts would be similar to the proposed Project and would be less than significant with mitigation. This alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures similar to the proposed Project.

Greenhouse Gas Emissions

The No Project/No Development Alternative would not include the construction of a warehouse building at the Project site. However, earth moving activities would still occur for remediation and the use of off-road equipment and vehicle trips could result in GHG emissions. As such, implementation of mitigation measures similar to what is proposed for the Project would be required. Impacts would be similar to but less than the proposed Project and would be less than significant with mitigation. This alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures similar to the proposed Project.

Geology, Soils, and Paleontological Resources

The No Project/No Development Alternative would not include any construction or operational activities associated with the proposed warehouse uses. However, ground-disturbing activities would still occur for remediation and could result in soil erosion and direct impacts to paleontological resources or unique geological features. Erosion control measures would be required under the SWPPP that would be prepared for the remediation work to minimize erosion impacts (SCS Engineers, 2025a; Appendix C). Implementation of mitigation measures for paleontological resources, similar to what is proposed for the Project, would be required. Impacts would be similar to the proposed Project and would be less than significant for soil erosion, and less than significant with mitigation for paleontological resources. This alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures similar to the proposed Project.

Hazards and Hazardous Materials

The No Project/No Development Alternative would not include any construction or operational activities associated with the proposed warehouse uses. However, ground-disturbing activities would still occur for remediation. Similar to the proposed Project, a Response Plan and SMP (SCS Engineers, 2025a and 2025b; Appendix C) would be implemented and would include procedures for remediating contaminated soil and groundwater and implementing health and safety measures to protect the general public and workers in the construction area. Construction impacts would be similar to the proposed Project and would be less than significant. No operational impacts related to vapor intrusion would result from this alternative. This alternative's contribution to cumulative impacts would be less than cumulatively considerable.

Noise

The No Project/No Development Alternative would not include any new construction or operational activities associated with the proposed warehouse uses. However, ground-disturbing activities would still occur for remediation, which would result in construction noise. Impacts would be similar to but less than the proposed Project and would be less than significant. This alternative's contribution to cumulative impacts would be less than cumulatively considerable.

Transportation

The No Project/No Development Alternative would not include any construction or operational activities associated with the proposed warehouse uses. This alternative would result in vehicular traffic associated with remediation of the Project site. Construction traffic impacts would be similar to but less than the proposed Project and would be less than significant. There would be no traffic associated with operation. This alternative would not result in the VMT reduction achieved by the proposed Project, because it would not introduce a new employment land use in a predominantly vacant area of the city. The alternative's contribution to cumulative impacts would be less than cumulatively considerable.

Tribal Cultural Resources

The No Project/No Development Alternative would not include any construction or operational activities associated with the proposed warehouse uses. However, ground-disturbing activities would still occur for remediation of the Project site and could result in direct impacts to tribal cultural resources. Implementation of mitigation measures similar to what is proposed for the Project would be required. Impacts would be similar to the proposed Project and would be less than significant with mitigation. This alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures similar to the proposed Project.

5.4.2. Alternative 2: Existing Zoning – Professional Office Alternative

5.4.2.1. Alternative 2 Description

The Existing Zoning – Professional Office Alternative would consider the development of the Project site with a use that is different from the industrial use under the proposed Project but that still conforms to the existing zoning standards, specifically the M-2 Zone which in addition to industrial uses, also allows businesses and professional office uses.⁴⁸ Under this alternative, a total of approximately 350,000 sf of professional office uses and 1,050 parking spaces would be constructed.⁴⁹ The alternative would consider the development of one or more professional office buildings at the Project site, which would contain individual office suites occupied by a range of professional tenants. The remaining areas of the Project site would be developed with parking areas, drive aisles, driveway(s), lighting, utility connections, storm-water treatment and conveyance facilities, and landscaped areas. Under the Existing Zoning – Professional Office Alternative, vehicular access to the site would be similar to the proposed Project. A 350,000 sf professional office building would generate 3,794 daily trips,⁵⁰ resulting in an increase of 1,370 daily trips compared to the Project.

⁴⁸ The M-2 Zone is intended for businesses engaged in heavier industrial activities than those permitted in the M-1 (Light Manufacturing) Zone. However, offices are a permitted land use within the M-2 Zone pursuant to the City's Municipal Code Section 91.31.1 (c) with a conditional use permit.

⁴⁹ The square footage has been reduced from the Project to account for additional parking spaces that are required (approximately 604 parking spaces) per City of Torrance Municipal Code Section 93.2.6: three (3) parking spaces (8.5 x 19 feet) for each one thousand (1,000) square feet of floor area for each office in which no activity is carried on catering to retail trade with the public and no stock of goods. Such business shall include but not be limited to offices for psychologists, attorneys, architects, accountants, managers and administrators.

⁵⁰ Calculations are based on Trip Generation from the 11th Edition, Institute of Transportation Engineers (ITE), Office (Code 710).

This alternative was selected as required by CEQA Guidelines Section 15126.6(e)(3)(A) to compare the environmental effects of the Project with an alternative that would allow the continuation of uses permitted by the City's General Plan and Zoning. In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project/No Development Alternative, analyzed above, may discuss "predictable actions by others, such as some other project if disapproval of the project under consideration were to occur." CEQA Guidelines Section 15126.6(e)(3)(B) states that "If disapproval of the project under consideration would result in actions by others, such as the proposal of some other project, this "no project" consequence should be discussed . . . and the analysis should identify the practical result of the project's nonapproval..." CEQA Guidelines Section 15126.6(e)(3)(C) further states that the No Project Alternative should project "what would reasonably be expected to occur in the foreseeable future if the project were not approved based on current plans and consistent with available infrastructure and community services." Based on this guidance, the Existing Zoning – Professional Office Alternative considers development of the Project site in accordance with the parameters set forth by the existing zoning on the Project site.

Objectives. The Existing Zoning – Professional Office Alternative would achieve some of the Project Objectives (see D, E, G and H, as described in Section 5.2.1). However, this alternative would not meet Project Objectives A, B, C, and F, because of the change in use from industrial to office. Objectives A, C, and F would not be met because this alternative would develop offices rather than industrial use, would not place industrial use near already established industrial uses, nor would it develop a Class A speculative industrial building that would accommodate a wide variety of users. Objective B would not be met because this alternative would not help meet regional demands for goods movement facilities.

Summary of Impacts. The Existing Zoning – Professional Office Alternative would result in greater impacts during operation related to air quality, energy, GHG emissions, and noise, due to the change to office use and associated increase in daily trips. Since this alternative would have the same development impact area, construction-related impacts related to biological resources, cultural resources, geology and soils, hazardous and hazardous materials, and tribal cultural resources would be similar to the proposed Project.

5.4.2.2. Environmental Impact Analysis

Air Quality

The Existing Zoning – Professional Office Alternative would result in the development of professional offices. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project. Under this alternative TRU source emissions would be eliminated. However, due to the use of this site as an office space, there would be an increase of 1,370 daily trips compared to the Project, but air emissions would still be within the SCAQMD's standards. Therefore, impacts would be greater than the proposed Project, due to greater sources of pollutants. However, no mitigation measures would be required as this alternative would still be within SCAQMD's standards. Therefore, impacts would remain less than significant, which is the same impact conclusion as the proposed Project. This alternative's contribution to cumulative impacts would be less than cumulatively considerable.

Biological Resources

The Existing Zoning – Professional Office Alternative would result in the development of professional offices. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar impacts to biological resources. Therefore, similar mitigation measures would be implemented as the proposed Project. Impacts from this alternative would also be less than significant with mitigation, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

Cultural Resources

The Existing Zoning – Professional Office Alternative would result in the development of professional offices. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar impacts to cultural resources. Therefore, implementation of MM CR-1 (Inadvertent Discovery of Cultural Resources) and MM CR-3 (Inadvertent Discovery of Human Remains) would be required. Impacts from this alternative would also be less than significant with mitigation, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

Greenhouse Gas Emissions

The Existing Zoning – Professional Office Alternative would result in the development of professional offices. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project. However, due to the use of this site as an office space, there would be an increase of 1,370 daily trips compared to the Project and this alternative would still exceed the SCAQMD's standards. Therefore, impacts would be greater than the proposed Project, due to a greater source of greenhouse gas emissions and similar mitigation measures would be required as the proposed Project. Therefore, impacts would remain less than significant with mitigation, which is the same impact conclusion as the proposed Project, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

Geology, Soils, and Paleontological Resources

The Existing Zoning – Professional Office Alternative would result in the development of professional offices. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar impacts to geology, soils, and paleontological resources. Therefore, similar mitigation measures would be implemented as the proposed Project. Impacts from this alternative would also be less than significant with mitigation, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

Hazards and Hazardous Materials

The Existing Zoning – Professional Office Alternative would result in the development of professional offices. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar impacts to hazards and hazardous materials. Additionally, the hazards associated with methane and VOCs would be similar to the proposed Project. Therefore, as with the proposed Project, an SMP and Response Plan would be implemented and would include procedures for remediating contaminated soil and groundwater and implementing health and safety measures to protect the general public and workers in the construction area. Vapor intrusion controls that would be implemented as part of the Response Plan would minimize any hazards to the public or the environment resulting from soil vapor. Impacts from this alternative would also be less than significant, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable.

Noise

The Existing Zoning – Professional Office Alternative would result in the development of professional offices. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the

proposed Project and would cause similar levels of noise and vibrations during construction. However, due to the lack of truck movements and tractor trailer storage activity (see Tables 4.7-21 and 4.7-22) in this alternative, the permanent increase in noise levels over the existing ambient levels would be slightly less than implementation of the proposed Project but would still be within the City's noise standards. Therefore, impacts from this alternative would also be less than significant, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable.

Transportation

The Existing Zoning – Professional Office Alternative would result in the development of professional offices. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar levels of traffic during construction. However, during operation, this alternative would generate 3,794 daily trips, resulting in an increase of 1,370 daily trips compared to the Project. This increase in daily trips would result in a greater impact to transportation. Therefore, implementation of MM TRA-1a, MM TRA-1b, and MM TRA-1c would be required. Impacts would remain less than significant with mitigation, which is the same impact conclusion as the proposed Project, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

Tribal Cultural Resources

The Existing Zoning – Professional Office Alternative would result in the development of professional offices. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar impacts to tribal cultural resources during construction and operation. Therefore, implementation of MM TCR-1a through MM TCR-1d would be required. Impacts from this alternative would also be less than significant with mitigation, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

5.4.3. Alternative 3: Manufacturing Use Alternative

5.4.3.1. Alternative 3 Description

The Manufacturing Use Alternative would consider the development of the Project site with a 403,033 sf industrial building for manufacturing uses only (whereas the proposed Project specifically includes storage and distribution uses, particularly warehousing, distribution, high-cube fulfillment, and up to 10% high-cube cold storage, to support the goods movement industry). Under this alternative, access to the site would be the same as the Project. Assuming all manufacturing uses for the proposed building, the Manufacturing Use Alternative would generate approximately 1,914 daily trips resulting in a decrease of 510 daily trips compared to the Project.⁵¹

Objectives. As compared with the Project, the Manufacturing Use Alternative would meet Project Objectives A, C, E, G and H; and meet, to a lesser degree, Project Objectives B, D, and F, as follows:

- Project Objectives G and H would be met, because this alternative would still redevelop a property that has access to available infrastructure, and any new development of comparable size would also require a landscaping plan that minimizes the demand for water resources.
- Project Objectives A, C, and E would be met to a similar degree as the proposed Project, because manufacturing use is considered a type of industrial use, and this use would create jobs, and be

⁵¹ Calculations are based on Trip Generation from the 11th Edition, Institute of Transportation Engineers (ITE), Code 140.

consistent with goals for the City of Torrance, and the adjacent land uses. It is speculative that a manufacturing use would not be economically competitive with similar industrial buildings in the local area and region. However, generally, goods movement is more in demand than manufacturing in Southern California given the region's role as a major hub for international trade and e-commerce, with the Port of Los Angeles and Port of Long Beach located approximately 5 miles southeast of the City. In addition, depending on the specific products being manufactured, manufacturing uses may require more specialized building requirements than a goods movement facility, potentially resulting in more difficulty with finding a tenant that will have their manufacturing needs met through the proposed development.

- Project Objective B would be met to a lesser degree than the proposed Project, because this alternative would develop an underutilized property, but it would not help meet regional demands for goods movement facilities.
- Project Objective D would be met to a lesser degree than the proposed Project, because this alternative would provide job opportunities, but would limit them to the manufacturing sector, rather than the broader industrial sector.
- Project Objective F would be met to a lesser degree than the proposed Project, because this alternative would not allow for a wide variety of users, when compared to the proposed Project. Additionally, limiting the use to manufacturing only would limit the availability of Class A tenants.

Summary of Impacts. The Manufacturing Use Alternative would result in reduced impacts to GHG emissions. However, even when accounting for the reduced mobile source emissions (approximately 21 percent reduction compared to the Project) and elimination of transport refrigeration unit (TRU) source emissions associated with this alternative, impacts related to GHG emissions would continue to occur under this alternative. Although impacts related to air quality, energy, noise and transportation were determined to be less than significant (with or without mitigation) under the Project, this alternative would further reduce those impacts. Since this alternative would have the same development impact area, construction-related impacts related to biological resources, cultural resources, geology and soils, hazardous and hazardous materials, and tribal cultural resources would be similar to the Project.

5.4.3.2. Environmental Impact Analysis

Air Quality

The Manufacturing Use Alternative would result in the development of a manufacturing facility. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would result in similar construction emissions. Operation emissions associated with the proposed Project would not exceed the SCAQMD regional threshold. Under this alternative TRU source emissions would be eliminated, further reducing the operational emissions. Therefore, impacts would be less than the proposed Project but would also be less than significant and no mitigation measures would be required. This alternative's contribution to cumulative impacts would be less than cumulatively considerable.

Biological Resources

The Manufacturing Use Alternative would result in the development of a manufacturing facility. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would result in similar impacts to biological resources. Therefore, similar mitigation measures would be required as the proposed Project. Impacts from this alternative would also be less than significant with mitigation, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

Cultural Resources

The Manufacturing Use Alternative would result in the development of a manufacturing facility. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar impacts to cultural resources. Therefore, implementation of MM CR-1 (Inadvertent Discovery of Cultural Resources) and MM CR-3 (Inadvertent Discovery of Human Remains) would be required. Impacts from this alternative would also be less than significant with mitigation, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

Greenhouse Gas Emissions

The Manufacturing Use Alternative would result in the development of a manufacturing facility. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would result in similar construction emissions. Under this alternative, TRU source emissions during operation would be eliminated, which would reduce the operational emissions. However, even without TRU source emissions, operational emissions would still exceed the SCAQMD regional threshold. Therefore, impacts would be less than the proposed Project but due to exceedance of the SCAQMD regional threshold, similar mitigation measures would be required. Impacts would remain less than significant with mitigation, which is the same impact conclusion as the proposed Project, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

Geology, Soils, and Paleontological Resources

The Manufacturing Use Alternative would result in the development of a manufacturing facility. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar impacts to geology, soils, and paleontological resources. Therefore, similar mitigation measures would be implemented as the proposed Project. Impacts from this alternative would also be less than significant with mitigation, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

Hazards and Hazardous Materials

The Manufacturing Use Alternative would result in the development of a manufacturing facility. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar impacts to hazards and hazardous materials. Additionally, the hazards associated with methane and VOCs would be similar to the proposed Project. Therefore, as with the proposed Project, a Response Plan and SMP (SCS Engineers, 2025a and 2025b; Appendix C) would be implemented and would include procedures for remediating contaminated soil and groundwater and implementing health and safety measures to protect the general public and workers in the construction area. Vapor intrusion controls that would be implemented as part of the Response Plan would minimize any hazards to the public or the environment resulting from soil vapor. In addition, during operational activities, compliance with existing hazardous materials and waste handling, storage, and transport regulations, as discussed in Section 4.6.2, would prevent any risks to the public or environment associated with the proposed manufacturing operations at the Project site. Impacts from this alternative would also be less than significant, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable.

Noise

The Manufacturing Use Alternative would result in the development of a manufacturing facility. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar levels of noise and vibrations. However, due to the lack of truck movements in this alternative, the permanent increase in noise levels over the existing ambient levels would be slightly less than implementation of the proposed Project but would still be within the City's noise standards. Therefore, impacts from this alternative would also be less than significant, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable.

Transportation

The Manufacturing Use Alternative would result in the development of a manufacturing facility. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar levels of traffic during construction. However, during operation, this alternative would generate approximately 1,914 daily trips resulting in a decrease of 510 daily trips compared to the Project. This alternative would result in a slight reduction in VMT as the proposed Project would, due to the Project introducing a new employment land use in a predominantly vacant area of the city. However, this alternative would do so at a lesser degree than the proposed Project, resulting in less of a beneficial impact compared to the proposed Project. The slight reduction in VMT and decrease in daily trips would result in a lesser impact to transportation. Impacts would remain less than significant with mitigation, which is the same impact conclusion as the proposed Project, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

Tribal Cultural Resources

The Manufacturing Use Alternative would result in the development of a manufacturing facility. Development would be guided by existing General Plan policies and zoning. Construction activities, or any new associated ground-disturbing activities would be similar to implementation of the proposed Project and would cause similar impacts to tribal cultural resources during construction and operation. Therefore, implementation of MM TCR-1a through MM TCR-1d would be required. Impacts from this alternative would also be less than significant with mitigation, and this alternative's contribution to cumulative impacts would be less than cumulatively considerable with the implementation of mitigation measures.

5.5. Comparison of Proposed Project and Alternatives

Table 5-1 compares the potential impacts of the proposed Project to the alternatives, and identifies if the Alternative would have the potential to meet most Project objectives. While all of the Alternatives would have the same impact conclusions as the proposed Project in terms of level of significance and the need for mitigation, the degree of impacts compared to the proposed Project would vary in some instances as shown below.

Table 5-1. Comparison of Alternatives to the Proposed Project

Environmental Resource	Alternative 1: No Project/No Development Alternative	Alternative 2: Existing Zoning – Professional Office Alternative	Alternative 3: Manufacturing Use Alternative
Air Quality	Fewer	Greater	Fewer
Biological Resources	Fewer	Similar	Similar
Cultural Resources	Similar	Similar	Similar

Environmental Resource	Alternative 1: No Project/No Development Alternative	Alternative 2: Existing Zoning – Professional Office Alternative	Alternative 3: Manufacturing Use Alternative
Greenhouse Gas Emissions	Fewer	Greater	Fewer
Geology, Soils, and Paleontological Resources	Fewer	Similar	Similar
Hazards and Hazardous Materials	Fewer	Similar	Similar
Noise	Fewer	Fewer	Similar
Transportation	Fewer	Greater	Fewer
Tribal Cultural Resources	Similar	Similar	Similar
Potential to Meet Most Project Objectives?	NO	YES	YES

1 - “Fewer” indicates that the alternative would create reduced or fewer impacts than the proposed Project would create. “Similar” indicates that impacts would be similar to those of the proposed Project. “Greater” indicates that the alternative would result in a greater level of impact than would the proposed Project.

2 - Section 5.4 discusses to what extent the alternatives meet the Project objectives.

5.6. Environmentally Superior Alternative

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where, as here, the “No Project” Alternative is environmentally superior to the proposed Project, the environmentally superior development alternative must be identified. Alternative 3, the Manufacturing Use Alternative, has been identified as the environmentally superior alternative. As shown in Table 5-1, this alternative would lessen environmental impacts in the areas of Air Quality, Greenhouse Gas Emissions, and Transportation. The alternative would be required to implement all mitigation measures identified for the proposed Project in order to ensure that impacts would remain less than significant. This alternative would have similar impacts in the areas of Biological Resources; Cultural Resources; Geology, Soils, and Paleontological Resources; Hazards and Hazardous Materials; Noise; and Tribal Cultural Resources.

Although Alternative 3 would be environmentally superior to the proposed Project, it would not reduce or eliminate significant impacts from the proposed Project, because there are no significant impacts from the proposed Project. Alternative 3 would also not reduce the need for mitigation measures, since impacts would not be reduced to levels that are less than significant without mitigation.

Similar to the proposed Project, Alternative 3 would not require mitigation measures for Air Quality, because operation emissions associated with the alternative would not exceed the SCAQMD regional threshold. Additionally, TRU source emissions would be eliminated, further reducing the operational emissions. Therefore, impacts to Air Quality would be less than the proposed Project and no mitigation measures would be required.

Similarly, emissions would be reduced for GHGs compared to the proposed Project; however, operational emissions would exceed the SCAQMDs regional thresholds, and would require mitigation for impacts to be less than significant.

Transportation impacts would be reduced under Alternative 3, due to a decrease of 510 daily trips compared to the Project, however, mitigation measures would still be required to ensure the impacts would be less than significant.

Due to the proposed use of the Project in Alternative 3, as a manufacturing only facility, this alternative would narrow the scope of the use of the Project, and reduce the extent to which Project objectives are attained.

A manufacturing-only facility may be harder to find tenants for, since manufacturing is generally very specialized, which may require more specialized building features than a goods movement facility. Generally, goods movement is more in-demand than manufacturing in Southern California, given the

region's role as a major hub for international trade and e-commerce, with the Port of Los Angeles and Port of Long Beach located approximately 5 miles southeast of the City. Due to this, there may be more difficulty finding a tenant that would have their manufacturing needs met by the development.

Additionally, this alternative would not help regional demands for goods movement facilities (Objective B). This alternative would limit jobs to the manufacturing sector, and would limit the variety of uses that could be implemented for the Project (Objectives D and F).

6. OTHER REQUIRED CEQA SECTIONS

This section includes a discussion of additional topics required by CEQA. These topics and their subsections include Section 6.1, Significant and Unavoidable Environmental Effects; Section 6.2, Significant Irreversible Environmental Changes; Section 6.3, Effects Not Found to be Significant; Section 6.4, Growth Inducing Effects; Section 6.5, Energy Consumption; and Section 6.6, Known Areas of Controversy and Unresolved Issues.

6.1. Significant and Unavoidable Environmental Effects

6.1.1. Significant Direct Effects of the Project

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR identify significant environmental effects which cannot be avoided by the Project, even with implementation of mitigation measures. The environmental impacts of the proposed Project are described in the issue area subsections in Section 4. Impacts that are significant and cannot be reduced to less than significant levels through the application of feasible mitigation measures would be characterized as significant and unavoidable impacts.

This EIR has not identified any significant and unavoidable impacts, as all significant impacts would be reduced to less than significant with implementation of mitigation measures.

6.1.2. Significant Cumulative Effects

According to Section 15355 of the State CEQA Guidelines, the term cumulative impacts “refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Individual effects that may contribute to a cumulative impact may be from a single project or several separate projects. Individually, the impacts of a project may be relatively minor, but when considered along with impacts of other closely related or nearby projects, including newly proposed projects, the effects could be cumulatively considerable.

A detailed analysis of the cumulative effects of the proposed Project is presented in each issue area subsection in Section 4, and for alternatives in Section 5. The cumulative analysis for each environmental issue area has determined that the proposed Project’s contribution to cumulative impacts would not be cumulatively considerable, and therefore cumulative impacts would be less than significant with implementation of mitigation measures, as described in Section 4.

6.2. Significant Irreversible Changes Caused by the Project if Implemented

Pursuant to Section 15126.2 (c) of the CEQA Guidelines, an EIR must address significant irreversible environmental changes and irretrievable commitments of resources that would be caused by the proposed Project. These changes include uses of non-renewable resources during construction and operation, long-term or permanent access to previously inaccessible areas, and irreversible damages that may result from Project-related accidents.

Implementation of the proposed Project would result in the consumption of energy in the form of fuel needed for vehicles and equipment used during both the construction phase and when the Project is operational. Additional energy would be required for the manufacture of new materials for the Project. The energy required for the production of these materials also would result in an irretrievable commitment of natural resources. The anticipated equipment, vehicles, and materials required for construction of the proposed Project are detailed in Section 2, Project Description.

Operation and maintenance activities would consist of routine inspection, repair, and maintenance activities, which are currently not conducted, because there is no Project and no existing operations on

the Project site. Therefore, the operation and maintenance of the proposed Project would cause an increase in the consumption or use of nonrenewable resources.

Implementation of the proposed Project would result in the permanent loss of approximately 6.76 acres of occupied coastal dune habitat for California legless lizard, and up to 17.83 acres of Crotch's bumblebee habitat (see Section 4.1, Biological Resources). Assuming that the mitigation measures for biological resources recommended in this EIR would be implemented, which include restoration of habitat at a 1:1 ratio for both habitats, the Project-induced loss of vegetation and habitat would be less than significant.

Construction and operation of the proposed Project would require the use of a limited amount of hazardous materials such as fuel, lubricants, and solvents. Additionally, during Project construction and operation preexisting soil or groundwater contamination potentially could be encountered. Prior to construction, the site would undergo remediation work with oversight from the LARWQCB, to clean up contaminants in the soil, soil vapor, and groundwater beneath the site released from the refinery that operated on the site. All hazardous materials would be stored, handled, and used in accordance with the mitigation measures recommended in this EIR and applicable federal, State, and local regulations, including a construction-phase Storm Water Pollution Prevention Plan (SWPPP). Assuming appropriate implementation of these plans and practices, as well as Mitigation Measures HAZ-1a through HAZ-1e as recommended in Section 4.6, Hazards and Hazardous Materials, potential environmental accidents associated with the proposed Project would be less than significant.

6.3. Effects Not Found to be Significant

This section, prepared in satisfaction of State CEQA Guidelines Section 15128 (Effects Not Found to Be Significant), is based in part on the Notice of Preparation (NOP), dated March 28, 2025, and contained in Appendix A of this Draft EIR.

The NOP was prepared to identify the potentially significant effects of the proposed Project and was circulated for public review between March 28, 2025, and April 28, 2025. In the course of this evaluation, certain impacts were found to be less than significant because the proposed Project's characteristics would not create such impacts. Consistent with Section 15128 of the State CEQA Guidelines, this section provides a brief description of the reasons why effects were found not to be significant or less than significant, based on the NOP comments or more detailed analysis conducted as part of the EIR preparation process.

6.3.1. Aesthetics

State Scenic Highways and Scenic Vistas

According to the City's General Plan, scenic vistas within the City include distant views of the San Gabriel mountains and the Pacific Ocean.⁵² The City has adopted policies to preserve these views for the hillside areas, which typically offer scenic vistas of these resources. The Project site is located in a largely urbanized area bordered by development on all sides, not located on a hillside, and is approximately 2.9 miles east of the Pacific Ocean. Additionally, views of the San Gabriel Mountains from the Project site are blocked by existing development in the surrounding area; thus no scenic views near the Project site would be adversely affected. According to the California Department of Transportation (Caltrans), State Scenic Highway System Map, the Project site is not located near an officially designated or eligible State Scenic Highway.⁵³ The nearest officially designated State Scenic Highway is State Route 27 located approximately 19 miles northwest of the Project site. No scenic resources within a scenic highway or special designated area for street trees would be damaged or removed.

⁵² <https://www.torranceca.gov/home/showpublisheddocument/2722/636302127526600000>

⁵³ <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>

The Project site is largely vacant and undeveloped with various dirt access roads within a heavily developed urban environment. The site does not have any unusual characteristics and are not known to be associated with any national, regional, or local figures of significance that would qualify them as a historical resource or of historical significance. The Project would be treated with materials and high-quality finishes similar to existing development, and features varying projections and heights (a maximum of 42 feet in height), which break up massing and make the Project more aesthetically appealing. The Project would also incorporate internal and perimeter landscape/hardscape features acting to screen views of the developed site, enhancing the visual perception of the Project site and vicinity. All final designs of the Project, including but not limited to the proposed building and landscape/hardscape features would conform to all applicable City design standards, and would be subject to City review and approval. The Project would not conflict with applicable zoning and other regulations governing scenic quality.

Light or Glare

The Project would introduce new sources of artificial light and glare. The Torrance Municipal Code and California Building Code requires that any new lighting be cast downward and shielded so as not to illuminate beyond the Project boundary and to avoid any light from spilling over onto the adjacent properties. Therefore, impacts associated with new sources of substantial light or glare would be less than significant.

6.3.2. Agriculture and Forestry Resources

Important Farmland

According to the California Department of Conservation (DOC) California Important Farmland Finder, the Project site is located within Urban and Built-up Land,⁵⁴ which is land used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. Therefore, no impacts to important farmland would occur.

Agricultural Zoning or Williamson Act Contracts

The Project site is zoned as Heavy Manufacturing District (M-2) and does not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no related impacts would occur.

Forest Zoning and Timberland

As stated above, the Project site is zoned as Heavy Manufacturing District (M-2), a non-forest zoning designation. As such, the Project would not conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned production. Accordingly, no impacts to forestry resources and timberland are anticipated.

6.3.3. Energy

The following discussion is based on the Energy Analysis prepared by Urban Crossroads, Inc. (2024c) for the Project and included as Appendix O.

Energy Consumption

The Project would consume energy resources in the form of non-renewable fossil fuels and electricity for site power. Construction would involve the short-term use of transportation fuels and electricity by various equipment. Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations, Title 13, Sections 2449 and 2485, limit idling from both on-road and off-road diesel-powered equipment and are enforced by the

⁵⁴ <https://maps.conservation.ca.gov/DLRP/CIFF/>

ARB. Additionally, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Operation of the Project would require the intermittent use of fuel for vehicles transporting goods and for other equipment used for warehouse operations. The Project is surrounded by existing transportation facilities and infrastructure which would provide future visitors and employees associated with the Project access to a mix of land uses near the Project, thus further reducing fuel consumption demand. Additionally, the Project will also be providing parking and EV infrastructure that would further promote fuel efficient vehicles.

Energy in the form of electricity for warehouse and office operations would also be required. Statewide policies and programs promote the use of renewable resources in the electricity supply and reduction in the carbon-intensity of transportation fuels. Implementation of the State of California's Low-Carbon Fuel Standard regulations and the State's long-term goal for carbon neutrality by 2045 or earlier require transportation fuels used in California to transition to renewable fuel sources or zero-emission technologies. The Project would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the California Title 24 energy efficiency standards. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. Title 24 standards are widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation.

The electricity supply is on a long-term trend of decarbonization as a result of California's Renewable Portfolio Standard. Over time, increasing portions of the Project's on-site and off-site energy use would be provided from renewable supplies that would decrease the Project's use of non-renewable fuels. Construction and operation of the proposed facility would occur on the site in a manner consistent with existing land uses in the area and would provide warehouse services that would implement the Torrance General Plan, create opportunities for employment within the City, and serve the local market demand for industrial building space.

As such, the proposed Project would not use non-renewable energy resources in a wasteful or inefficient manner; therefore, impacts would be less than significant.

Energy Plan Conflicts

The Project would result in the construction and operation of a warehouse facility and would not conflict with adopted State or local renewable energy or energy plans. California Code of Regulations Title 13, Sections 2449 and 2485, limit idling from both on- road and off-road diesel-powered equipment and are enforced by the ARB. The Project would comply with these regulations. Additionally, the Project would not require the removal of any existing renewable energy infrastructure, such as solar or wind-powered electric generating facilities. The City would need to issue Building Permits for new buildings and would ensure compliance with energy efficiency requirements under the California Green Building Code (Title 24 of the California Code of Regulations). The City is responsible for the design, inspection, management, and oversight of construction projects to ensure projects comply with energy efficiency requirements. The energy necessary to develop and operate the proposed facility would be used efficiently and would represent a negligible portion of statewide energy consumption. Therefore, the Project would not conflict with plans for renewable energy or energy efficiency, and this impact would be less than significant.

6.3.4. Hydrology and Water Quality

Water Quality

The Project would comply with all applicable water quality control and sustainable groundwater management plans. The water quality design for the Project complies with the 2002 Los Angeles County Standard

Urban Stormwater Mitigation Plan (SUSMP) Manual and subsequent 2014 Los Angeles County Low Impact Development (LID) Manual, which aim to increase groundwater recharge, enhance water quality, and prevent degradation to downstream natural drainage courses. Implementation of site-specific best management practices (BMPs) and applicable LID treatment control BMPs, including wetland mods would help meet these goals for the Project and limit impacts to hydrology and water quality. Specifically, wetland mods would be used to remove pollutants and treat stormwater from the site before discharging to the municipal storm system. As noted in the Preliminary Hydrology Study, during boring and trenching for a geotechnical feasibility study, free water was not encountered. The lack of free water and the moisture level of the samples led the investigators to estimate that the groundwater at the site is more than 30 feet below the ground surface. Further, historically the groundwater levels typically read between 48 feet and 77 feet below ground surface from 2005-2017. (Kimley-Horn, 2024a) As stated in the Preliminary SUSMP Report (Kimley-Horn 2024b), infiltration is considered infeasible at the site. As such, groundwater recharge quantities or recharge rates cannot be calculated and retaining walls with a stem back-drain system to drain retaining wall backfill is recommended to avoid interfering with groundwater. With implementation of this Project design feature, impacts would be less than significant. Additional information about the proposed drainage changes to the Project site are described in the Preliminary Standard Urban Stormwater Mitigation Plan prepared for the proposed Project (Kimely-Horn, 2024b; Appendix P).

Flood Hazards, Seiches, Tsunamis

The Project is not within a flood hazard, tsunami, or seiche zone and would not risk release of pollutants due to Project inundation or impede or redirect flood flows. Therefore, impacts related to hydrology and water quality would be less than significant.

6.3.5. Land Use and Planning

Division of an Established Community

The existing Project site is largely vacant and undeveloped with various dirt access roads. The site is bounded by Madrona/Prairie Avenue to the west, Del Amo Boulevard to the south, and railroad tracks from northwest to southwest, forming a triangularly shaped Project site. The Project would not physically divide an established community. No impact would occur.

Land Use Conflicts

The Project site has a General Plan land use designation of Heavy Industrial (I-HVY) and is zoned as Heavy Manufacturing District (M-2). The Project Applicant would develop the Project site in accordance with the underlying land use designations and applicable zoning ordinance development standards. No change to the existing land use designation or zoning is required or proposed by the Project. The Project is consistent with the City of Torrance General Plan and would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation. Additionally, the Project would not degrade the character or quality of the surrounding area or conflict with the existing Heavy Manufacturing District zoning controls. Therefore, no impacts would occur.

6.3.6. Mineral Resources

Mineral Resources of Statewide or Local Importance

According to the City's General Plan, Community Resources Element, the Project site is classified as Mineral Resource Zone (MRZ)-3, which is defined as a zone where the significance of mineral deposits cannot be determined from available data.⁵⁵ A small strip of land within the City located south of Pacific Coast Highway and roughly east of Hawthorne Boulevard approximately 3 miles south of the Project site

⁵⁵ <https://www.torranceca.gov/home/showpublisheddocument/2722/636302127526600000>

is designated as MRZ-2, which is identified as a zone with adequate information indicating that significant mineral deposits are present or there is a high likelihood for their presence, and development should be controlled. Accordingly, because of the distance of MRZ-2 from the Project site, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the State nor would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated in the City's General Plan. No impacts would occur.

6.3.7. Population and Housing

Growth Inducement

The Project does not involve the development of residential uses and would not directly increase the resident population, but the Project would create jobs and increase employment in the City of Torrance. The Project would create short-term jobs during the construction phase and long-term jobs during the operation phase. These short-term and long-term positions would be filled by workers who, for the most part, would already reside in the local area; therefore, construction and operation of the Project would not generate a substantial temporary or permanent increase in population within the Project area. Therefore, the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. Impacts would be less than significant.

Displacement of Persons or Dwelling Units

The Project would not require construction of replacement housing and would not displace existing housing or residents as the Project site is currently vacant. No impact would occur.

6.3.8. Public Services

Fire and Police Protection

The proposed Project would not substantially increase the demand for fire and police protection services. The Project would be developed in accordance with the applicable provisions of the City's Fire Code (Torrance Municipal Code Division 8, Chapter 5). Project plans would be reviewed and approved by the City's Building and Police Departments, which would ensure that adequate safety and crime prevention measures are provided within the Project's design. Per Torrance Municipal Code Division 2, Chapter 9, Article 5 (Fire Facilities Impact Fees) and Article 6 (Police Facilities Impact Fees), the Project Applicant would be required to pay fire facilities and police facilities impact fees to cover the costs of constructing new or modified facilities and ensure that new development contributes its fair share to funding these services and facilities. The City of Torrance is an urbanized area with limited vacant land for constructing a substantial number of new or modified facilities. The construction of any facilities as a result of the Project would likely be minimal and would be limited to highly disturbed areas with few environmentally sensitive resources; for these reasons, the construction of any new fire and police protection facilities would not result in substantial adverse physical impacts. Therefore, impacts would be less than significant.

Other Public Facilities

The Project does not include any residential land uses and, therefore, is not expected to result in an increase in population or demand for recreational facilities and other public facilities/services, including libraries, community recreation centers, post offices, public health facilities, and/or animal shelters. Additionally, the Project would not directly result in an increase in students and is not expected to indirectly draw students to the area within the Torrance Unified School District. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public school facilities, park facilities, and other park facilities. Impacts would be less than significant.

6.3.9. Recreation

Physical Deterioration of Recreational Facilities

The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated because the Project does not involve the development of residential uses. The proposed industrial use would not create an increase in the use of such recreational facilities. Accordingly, the Project does not include recreational facilities and would not require the construction of new or expanded recreational facilities. Impacts would be less than significant.

6.3.10. Utilities and Service Systems

Environmental Effects from Utilities and Service System Improvements

The Project would include utility connections to existing infrastructure to provide electric power, telecommunications services, and water, and would also include a sewer lift station at the southeastern corner of the building and extension of existing 8-inch sewer lines to connect to an existing sewer main on Del Amo Boulevard. These activities would occur within a developed area with existing utility facilities and therefore would not cause significant environmental effects.

Demand on Utilities and Service Systems

The Project would generate a negligible demand on utility and service systems, including water, wastewater treatment, stormwater drainage, electricity and natural gas, telecommunications, and solid waste disposal, compared to the overall demand generated by the City of Torrance. During the scoping period for the proposed Project, the Los Angeles County Sanitation Districts (Districts) provided a comment letter with information about wastewater from the proposed Project, including the proposed quantity, the receiving trunk sewer and its capacity, the treatment facility and its capacity, and associated connections fees. The comment letter also states that the letter does not constitute a guarantee of wastewater service but advises the City that the Districts intend to provide service up to the levels that are legally permitted and informs the City of the existing capacity and any proposed expansion of the Districts' facilities.

The proposed Project would not generate a substantial amount of wastewater, as the warehouse would be used to store goods and to process them for distribution to support the goods movement industry. Warehouse operations generally do not produce large amounts of wastewater. Typical sources of wastewater would be generated from vehicle and equipment cleaning and restrooms, which would not be expected to produce wastewater at levels that would exceed the capacity of the Districts as the wastewater treatment provider; or specifically, the capacity of the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant) located in the City of Carson, which would treat waste water generated by the proposed Project with a capacity of 400 million gallons per day (mgd) out of which an average flow of 248.3 mgd is currently being processed.

The sewer infrastructure improvements under the proposed Project, including a new sewer lift station and 8-inch sewer lines, would also be designed to accommodate the waste water needs of the proposed development. In addition, the water quality design for the Project complies with the 2002 Los Angeles County SUSMP Manual and subsequent 2014 Los Angeles County LID Manual, which aim to increase groundwater recharge, enhance water quality, and prevent degradation to downstream natural drainage courses. With implementation of these Project design features, the proposed Project would not exceed the capacity of existing utilities and service systems. Therefore, impacts would be less than significant.

6.3.11. Wildfire

Exposure to Wildfire

According to the California Department of Forestry and Fire Protection (Cal Fire), the Project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).⁵⁶ The Project site is located within the limits of the City of Torrance, and is therefore not within a State Responsibility Area (SRA), which is the land where the State of California is financially responsible for the prevention and suppression of wildfires. Therefore, the Project would have no impacts related to wildfires.

6.4. Growth-Inducing Effects

The discussion on growth-inducing effects must address “ways in which the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment” (CEQA Guidelines Section 15126.2(d)). Growth-inducing effects of a project are considered significant if the project directly causes population growth, or would provide the means to allow for population growth, beyond that considered in local and regional land use plans or another relevant population growth projection.

The proposed Project does not include residential uses and therefore would not directly induce population growth.

The proposed Project would develop approximately 403,033 square feet of new high-cube warehouse building on a vacant site. The Project would create short-term jobs during the construction phase and long-term jobs during the operation phase. These short-term and long-term positions would be filled by workers who, for the most part, would already reside in the local area, due to the existing workforce. In 2023, the United States Census Bureau estimated that the City of Torrance has a labor force of approximately 72,000 (United States Census Bureau, 2023). As such, the local labor force is sufficiently large enough to allow the Project’s employment opportunities to be filled locally such that unplanned growth would not occur.

Although the proposed Project would include utility connections, these would be connected to existing infrastructure and would provide electric power, telecommunications services, and water to the Project site only. There would be no extension of infrastructure into unserved areas outside of the Project area; therefore, no removal of physical barriers to growth would occur. As such, the proposed Project would not indirectly induce substantial population growth. No impacts would occur.

6.5. Energy Consumption

Pursuant to Appendix F (Energy Conservation) of the CEQA Guidelines, an EIR must address potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.

Construction

The United States Environmental Protection Agency (EPA) oversees the regulation of nonroad diesel engines used in both mobile equipment—such as bulldozers, scrapers, and front-end loaders—and stationary equipment, including generators, pumps, and compressors. While the EPA does not provide formal fuel economy standards for nonroad diesel engines, it does regulate diesel emissions. The EPA implemented the initial set of emission standards (“Tier 1”) for all new nonroad diesel engines exceeding 37 kilowatts (kW) or 50 horsepower in 1994. Between 1996 and 2000, these Tier 1 standards were phased in for varying engine sizes, resulting in a 30 percent reduction in nitrogen oxide (NOx) emissions. Subsequent regulatory measures established more stringent emission regulations for NOx, hydrocarbons,

⁵⁶ <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>

and particulate matter, including the establishment of standards for nonroad diesel engines below 37 kW. Additionally, "Tier 2" standards were phased in for all engine categories from 2001 to 2006, followed by the adoption of "Tier 3" standards for engines ranging from 37 to 560 kW (50 to 750 horsepower) between 2006 and 2008. NOx emissions were reduced by 60 percent and particulate matter by 40 percent as a result of these additional standards compared to Tier 1 levels. The Clean Air Nonroad Diesel Rule was issued in 2005 by the EPA and phased in from 2008 to 2014, which reduced nonroad diesel engine emissions by 90 percent. The purpose of these emission standards is to encourage the adoption of advanced clean technologies for nonroad diesel engines capable of enhancing fuel combustion.

Construction of the proposed Project would involve the short-term use of transportation fuels and electricity by various equipment. Construction equipment is widely available throughout the region and is subject to the aforementioned EPA emissions standards. There are no unusual Project characteristics that would necessitate the use of construction equipment that would not meet EPA standards. Additionally, as discussed in Section 6.3.3, implementation of the State of California's Low-Carbon Fuel Standard regulations to meet the State's long-term goal for carbon neutrality by 2045 or earlier requires transportation fuels used in California to transition to renewable fuel sources or zero-emission technologies. Therefore, it is expected that construction fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region.

Operations and Maintenance

Vehicle fuel efficiency is regulated by federal law. Under the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic Safety Administration (NHTSA) sets and updates additional vehicle standards. All vehicles used during Project operation would adhere to NHTSA standards.

Operation of the Project would require the intermittent use of fuel for vehicles transporting goods and for other equipment used for warehouse operations. Energy in the form of electricity for warehouse and office operations would also be required. As previously stated, implementation of the State of California's Low-Carbon Fuel Standard regulations to meet the State's long-term goal for carbon neutrality by 2045 or earlier requires transportation fuels used in California to transition to renewable fuel sources or zero-emission technologies. Additionally, while the proposed Project would provide overall economic benefits by supporting the regional goods movement industry, the Project is intended to primarily maximize local job opportunities for residents living within or near the City of Torrance, limiting the distance of worker commutes and associated fuel consumption. Electrical service required during Project operation would be provided by Southern California Edison. The proposed Project's estimated building electricity consumption is summarized in Table 6-1.

Table 6-1. Energy Consumption Estimates

Energy Source	Square Feet	Annual Consumption Rate	Annual Consumption
Electricity	403,033	6.6 kilowatt hour (kWh)/square foot	2.7 million kWh/square foot

Source: United States Energy Information Administration, 2016

Note: The electricity consumption rate for 'Warehouse and storage' is shown.

As shown in Table 6-1, the proposed Project would require approximately 2.7 million kWh of electricity at buildout. The proposed building would be subject to the latest adopted edition of the California Green Building Code and Title 24 energy efficiency standards. As stated in Section 6.3.3, the electricity supply is on a long-term trend of decarbonization as a result of California's Renewable Portfolio Standard. Over time, increasing portions of the Project's on-site and off-site energy use would be provided from renewable supplies that would decrease the Project's use of non-renewable fuels. Therefore, the proposed Project would not result in the unnecessary, wasteful, or inefficient use of energy.

6.6. Known Areas of Controversy and Unresolved Issues

Section 15123 of the CEQA Guidelines requires a Draft EIR to identify areas of controversy known to the lead agency, including issues raised by other agencies and the public, and issues to be resolved.

Comments were received from public agencies and interested parties in response to the Notice of Preparation (NOP) (see Table 1-1 in Section 1, Introduction). The City distributed the NOP of the EIR for a 30-day agency and public review period starting on March 28, 2025, to April 28, 2025. A public scoping meeting was held on Wednesday April 9, 2025, in the City of Torrance. There were no attendees and associated public comments at the meeting.

The City also conducted an agency-specific meeting on Wednesday April 9, 2025, which was attended by representatives from the following agencies: Los Angeles County Metropolitan Transportation Authority (Metro) and the City of Lawndale.

The following environmental topics of potential controversy were identified during the scoping meetings and/or NOP process:

- Although the logistics industry is an important component of the economy, warehouses can result in environmental impacts, including those related to air quality and health, noise, and transportation.
- Land use conflicts between warehouses and sensitive receptors must be avoided, or the impacts of any unavoidable conflicts must be mitigated.
- Potential adverse air quality and greenhouse gas impacts and air pollutant sources from the proposed Project must be identified.
- Measures to reduce emissions associated with the Project to help the State meet air quality goals must be considered.
- Potentially adverse public health impacts from diesel particulate matter (DPM) associated with warehouse operations within close proximity of sensitive land uses is a concern. The potential health risk impacts to these receptors and mitigation measures that would reduce or eliminate DPM risks must be evaluated.

The major issues to be resolved by the City, as the Lead Agency for the proposed Project, include the following:

- The adoption or modification of recommended mitigation measures.
- The consideration of additional mitigation measures that could be applied to the proposed Project.
- The approval of the proposed Project or an alternative.

7. REPORT PREPARATION TEAM AND REFERENCES

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8. MITIGATION MONITORING AND REPORTING PROGRAM

The City of Torrance is the CEQA Lead Agency. In that role, if the proposed Project or an alternative is approved, the City will be responsible for ensuring that monitoring and reporting on required mitigation occurs. The Applicant and project proponent, Prologis, would be responsible for implementing all applicable measures, including the adopted mitigation measures and conditions of project approval, as well as conditions imposed in any permits or regulations administered by other responsible agencies. Proposed mitigation measures are listed in this Mitigation Monitoring and Reporting Program (MMRP).

Table 8-1. Proposed Mitigation Measures

BIOLOGICAL RESOURCES	
MITIGATION MEASURE	MM BIO-1a: Mitigation for Southern Tarplant. The Applicant shall collect seed from southern tarplant from the Project site for dispersal to a translocation site to be approved by the City of Torrance. Possible receiver sites may include Madrona Marsh or other sites with existing southern tarplant populations that can be enhanced or where suitable habitat conditions exist such that southern tarplant can be introduced. A qualified biologist will assess the potential receiver site(s) and, once a candidate site is identified, will determine what if any site preparation would be needed prior to the broadcast of seed. Preparation might include the removal of non-native vegetation and performing potential soil treatments, including scarification, to improve habitat conditions at the site. Prior to the implementation of ground-disturbing activities, a Southern Tarplant Translocation Plan will be prepared. The plan will outline seed collection procedures, site preparation (including non-native vegetation treatment), translocation methods, and monitoring requirements .
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	Prior to construction
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM BIO-1b: Protection and Avoidance Surveys for Nesting Birds. Vegetation clearing, if feasible, will be conducted outside of the nesting season (February 1 through September 15). If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior any disturbance of the site, including diking, demolition activities, and grading. The qualified biologist shall possess at least 2 years of experience in Southern California ecosystems and be able to identify and locate bird nests in both urban and natural environments. The survey must encompass both the Project site and adjacent areas that activities could affect, either indirectly (e.g., construction noise or lighting) or directly (e.g., ground disturbance or dust). If an active nest is found, a qualified biologist shall establish a suitable disturbance buffer around it using flagging or staking. Construction must not occur within these buffer zones until the biologist determines the nest is inactive. Ongoing nest monitoring at least weekly throughout construction is required to ensure buffers remain intact and are respected, and to update the nest's status. The buffer shall be removed only by the qualified biologist, and work is allowed to proceed in that area once the qualified biologist confirms the nest is no longer active.
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	Prior to and during construction
Verification Approval Party	City of Torrance

BIOLOGICAL RESOURCES

MITIGATION MEASURE	MM BIO-1c: Protection and Avoidance Surveys for Crotch's Bumble Bees. Prior to any ground disturbance of the Project site, the Applicant shall consult with CDFW to determine whether avoidance and minimization measures are feasible to avoid "take" of Crotch's bumble bee individuals. If "take" avoidance is determined to be infeasible, then the Applicant shall obtain an Incidental Take Permit (ITP) from CDFW. The loss of up to 17.83 acres of Crotch's bumble bee habitat will be mitigated through the enhancement of offsite lands with potential to support Crotch's bumble bee. The proposed mitigation lands can be lands that are already conserved and will be enhanced specifically to improve Crotch's bumble bee uses, or lands that would be conserved specifically for Crotch's bumble bee and then enhanced. One potential mitigation area being investigated is conserved land under Los Angeles World Airports (LAWA). Habitat enhancement would be implemented at a minimum 1:1 ratio.
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	Prior to and during construction
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM BIO-1d: Protection and Avoidance Surveys for Burrowing Owls. Prior to construction, a qualified biologist will survey the Project site and a 500-foot buffer around the Project site for burrowing owls following methods included in the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). The first survey must be conducted between 14 and 30 days of starting initial grading or Project activities. The survey results must be submitted to the City of Torrance before any Project activities may proceed. If ground disturbance is delayed for more than 30 days, the area must be resurveyed including but not limited to a final survey conducted within 24 hours prior to ground disturbance. If burrowing owls are found, the City of Torrance must notify the California Department of Fish and Wildlife (CDFW) within three days. If "take" avoidance is determined to be infeasible, then the applicant shall obtain an Incidental Take Permit (ITP) from CDFW.. All conditions of the Incidental take Permit must be followed.
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	Prior to and during construction
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM BIO-1g: Mitigation for Legless Lizards. The following measures shall be implemented: ■ Relocation of Legless Lizards. Legless lizards that occupy the site will be captured and relocated to an approved site within Los Angeles County. The relocation will involve two phases. The first phase will include capture and relocation of legless lizards prior to ground disturbing activities, preferably during the winter period when soil moisture is close to the surface. The timing and duration of the initial relocation efforts will be determined by the biologist, but it is expected that relocation efforts will be staggered over a period of weeks or months prior to ground disturbing activities. The second phase will include capture and relocation of any remaining legless lizards during ground disturbing activities. The relocation site will consist of the Los Angeles World Airports (LAWA) Los Angeles/ El Segundo Dunes in Los Angeles County or other potentially suitable location approved by CDFW and the City of Torrance.

BIOLOGICAL RESOURCES

The Project Biologist will prepare a Southern California legless lizard Relocation Plan which will address both relocation phases, to be approved by the City of Torrance and CDFW that will include the components listed above. Specifically, the plan will include the following:

- Description of the Relocation/Receptor site, which must be procured or permissions obtained prior to implementation of the capture and relocation program.
 - Description of relocation phases, including timing, methodology, duration, and responsibilities of the Project Biologist.
 - Description of the Receptor Site and release of the legless lizards during each of the phases described above.
- Restoration of Coastal Dune Habitat. Coastal dune habitat at a location approved by the City of Torrance and CDFW will be restored at a minimum 1:1 ratio over the 6.76 acres of occupied habitat identified at the Project site. As previously stated, the relocation site will consist of the LAWA Los Angeles/El Segundo Dunes or other potentially suitable location(s) approved by CDFW and the City of Torrance.

If the LAWA Los Angeles/El Segundo Dunes are selected as the relocation site, the proposed dune restoration will be implemented consistent with Appendix A-3c of the LAX Master Plan Final Environmental Impact Statement entitled "Los Angeles/El Segundo Dunes Habitat Restoration Plan" dated January 2005. Restoration would occur within the approximately 307-acre Los Angeles/El Segundo Dunes which includes an approximately 203 acres reserved for the El Segundo blue butterfly and as such includes sufficient area for the restoration effort. The Los Angeles/El Segundo Dunes support an existing population of legless lizards and represents an ideal site for the proposed restoration. The Los Angeles/El Segundo Dunes Habitat Restoration Plan includes the following performance standards for dune restoration:

Performance criteria to be met include the attainment of 10-, 20, 30-, 40, and 45-percent cover of native species, including perennials and annuals typical of the habitat, over a five-year period, as determined by the point-intercept method, conducted during the spring, to facilitate the identification of annual species. Additional performance criteria to be met include the attainment of no more than 15-percent cover of non-native species and 0-percent cover of non-native invasive species as defined by the California Exotic Pest Plant Council [note: currently known as California Invasive Plant Council]. In addition, the following model, as prescribed in the Long-Term Management Plan, shall be adhered to with the final value, in conjunction with a 45-percent cover of native species, determining the final success criteria (Table 5.5.4-1, Southern Foredune Model: Subsite 23). If monitoring discerns any failure in performance goals, remedial plantings shall be undertaken. Habitat restoration shall be conducted by a qualified habitat restoration specialist.

The above-referenced performance standard may be modified in coordination with CDFW and LAWA to ensure optimal habitat conditions for the legless lizard.

Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	Prior to and during construction
Verification Approval Party	City of Torrance

CULTURAL RESOURCES

MITIGATION MEASURE	MM CR-1: Inadvertent Discovery of Cultural Resources. During construction, if cultural resources are encountered during ground disturbing activity, all activity within a 50-foot radius of the find shall be stopped, the City of Torrance shall be notified, and a qualified archaeologist shall be retained to evaluate the discovery will also be notified. The qualified archaeologist shall determine if the discovery meets the definition of a historical or unique archaeological resource, and make appropriate recommendations regarding the significance and treatment of such find(s) prior to the continuation of any construction work within the above-referenced 50-foot radius. If the find(s) do(es) not meet the definition of a historical or unique archaeological resource, no further study or protection is necessary prior to reinitiating construction. If the find meets the definition of a historical or unique archaeological resource, then it shall be avoided by Project activities. If avoidance is not feasible, adverse effects to such resources will be mitigated in accordance with the recommendations of the archaeologist. Recommendations may include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery shall be submitted to the City of Torrance and the South Central Coastal Information Center.
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	During construction
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM CR-3: Inadvertent Discovery of Human Remains. During construction, if human remains are discovered during excavation or grading, all activity within a 50-foot radius of the find shall be stopped. The Los Angeles County Coroner shall be notified immediately to make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of the identification. Once the NAHC identifies the most likely descendant(s) (MLD), the descendant(s) will make recommendations regarding proper burial (including the treatment of grave goods), which will be implemented in accordance with Section 15064.5(e) of the California Code of Regulations, Title 14. The archaeologist shall recover scientifically valuable information, as appropriate and in accordance with the recommendations of the MLD. A report of findings documenting any data recovery shall be submitted to the City of Torrance and the South Central Coastal Information Center.
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	During construction
Verification Approval Party	City of Torrance

GREENHOUSE GAS EMISSIONS

MITIGATION MEASURE	MM GHG-1a: Reduce Vehicle Idling. Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include: 1. instructions for truck drivers to shut off engines when not in use; 2. instructions for drivers of diesel trucks to restrict idling to no more than five (5) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3. telephone numbers of the building facilities manager and CARB to report violations. Prior to the issuance of an occupancy permit, the City shall conduct a site inspection to ensure that the signs are in place.
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	During construction
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM GHG-1b: Provide Documentation for Clean Engine Incentives. Prior to tenant occupancy, the Project Applicant or successor in interest shall provide documentation to the City demonstrating that occupants/tenants of the Project site have been provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	After construction
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM GHG-1c: Provide EV Charging Stations. Final Project designs shall provide for installation of conduit in tractor trailer parking areas for the purpose of accommodating potential installation of EV truck charging stations.
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	Prior to construction, during design phase
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM GHG-1d: Electrify Truck and Dock Bays. All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric transport refrigeration units (TRUs).
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	Prior to construction, during design phase
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM GHG-1e: Use Zero-Emission On-Site Equipment. All on-site outdoor cargo-handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) and all on-site indoor forklifts will be zero-emission powered engines (electric powered or equivalent).
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance

GREENHOUSE GAS EMISSIONS

Monitoring Phase/Timing	During operations
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM GHG-1f: Reduce GHG Emissions or Surrender Offset Credits. The Applicant or its designee shall reduce or offset annual incremental greenhouse gas (GHG) emissions from Project-related sources. The incremental GHG emissions are those GHG emissions resulting from operational activities, including transportation, during the life of the proposed Project. These incremental emissions are estimated to be less than or equal to 48,330 metric tons of carbon dioxide equivalent (MTCO₂e) total over the 30-year useful life of the Project. ■ The Applicant or its designee shall demonstrate, prior to issuance of a certificate of occupancy, that verified offset credits have been secured and surrendered in an amount equal to the total Project emissions offset required for the 30-year useful life. ■ Offset credits shall be sourced from recognized voluntary carbon registries commonly relied upon for CEQA mitigation, including American Carbon Registry (ACR), Climate Action Reserve (CAR), or Verra, without geographic restriction. • Projects must demonstrate that reductions are real, additional, permanent, quantifiable, and independently verified consistent with CEQA Guidelines. GHG reductions generated or carbon sequestrations by implementing a GHG reduction project consistent with a methodology or accounting protocol that is equal to or more rigorous than CARB protocol requirements under 17 CCR 95972. The protocol for achieving reductions must determine the extent to which GHG emission reductions and GHG removal enhancements are achieved by the GHG reduction project and must establish a GHG reduction project baseline and demonstrate that the reduction of GHG emissions is real, permanent, quantifiable, verifiable, enforceable, and additional. For the purposes of this mitigation measure, the definitions of 17 CCR 95802(a) shall apply. Note that enforceable, as defined in 17 CCR 95802(a), is specific to CARB's Cap-and-Trade regulatory program, where CARB holds enforcement authority. This mitigation measure would generate GHG reductions outside of CARB enforcement authority. Therefore, enforceable is modified to mean in this context that the GHG reduction project generating the GHG offset must be owned by a single entity and must be backed by a legal instrument or contract that defines exclusive ownership. • GHG reductions from voluntary-market registry offset credits listed with and verified by: (1) one of the following CARB-approved Offset Project Registries: American Carbon Registry (ACR); Climate Action Reserve (CAR); or Verra, formerly Verified Carbon Standard. "Offset Project Registry" has the same definition as that set forth in Section 95802 of Title 17 of the California Code of Regulations (17 CCR 95802); (2) Climate Forward; or (3) GHG reduction/carbon sequestration supplies that are consistent with requirements specified in the State CEQA Guidelines and case law. ■ Offset credits shall be surrendered on a schedule approved by the City, with full satisfaction demonstrated prior to occupancy. ■ The City shall verify documentation of registry-issued and retired credits prior to their use as mitigation.
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	During operations
Verification Approval Party	City of Torrance

GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES

MITIGATION MEASURE	MM GEO-1: Implement Recommendations in Geotechnical Investigations. The proposed Project shall be constructed in accordance with the geotechnical engineering recommendations as presented in the Geotechnical Design Update, Proposed Warehouse Facility, 3041± Del Amo Boulevard, Torrance, Los Angeles County, California (Leighton, 2023), as well as any subsequent documents, including responses to City comments. These recommendations address site preparation, excavation, fill placement and compaction, foundation design, and site drainage, among other topics, as summarized below (full recommendations are included in Appendix H of this EIR). Project grading would comply with recommendations of the geotechnical investigation (Leighton, 2023) to remove all undocumented fill from under the proposed industrial building footprint, which would extend 50 feet above msl in the central portion of the existing borrow pit. The limits of existing fill removal will be verified by the Leighton representative during site grading activities. In addition, site sands shall be properly compacted, and the site finish grades shall be lowered to provide more balanced earthwork requiring less import. During grading operations, the Geotechnical Engineer (a representative of Leighton) shall be onsite to observe that soil and geologic conditions do not differ substantially from those expected. Mitigation shall follow recommendations set forth in the 2023 Geotechnical Design Update (Appendix H).
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	During operations
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM GEO-5: Monitor Ground-Disturbing Activities. The Project applicant shall retain a qualified paleontologist to monitor ground-disturbing activities in native sands on the Project site. The qualified paleontologist shall be present during the pre-grading meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils could be encountered. The paleontologist shall determine, based on consultation with the City, when monitoring of grading activities is needed based on the onsite soils and final grading plans. All paleontological work to assess and/or recover a potential resource at the Project site shall be conducted under the direction of the qualified paleontologist and follow the standard protocols of the Natural History Museum of Los Angeles County. If any fossil remains are uncovered during earth-moving activities, all heavy equipment shall be diverted at least 50 feet from the fossil site until the monitor has had an opportunity to examine the remains and determines that earthmoving can resume. The extent of land area that is prohibited from disturbance shall be at the discretion of the paleontological monitor. Samples of native sands shall be collected as necessary for processing and shall be examined for fossils. The paleontologist shall prepare a report of the results of any findings following accepted professional practice and submit the report for review by the City of Torrance Planning Division.
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	During operations
Verification Approval Party	City of Torrance

TRIBAL CULTURAL RESOURCES

MITIGATION MEASURE

MM TCR-1a: Retention of Tribal Monitor. Prior to the issuance of a demolition permit for the Project, the Applicant shall retain, at its cost, a Native American Monitor from the Gabrieliño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe). The Native American Monitor shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project (collectively “ground disturbing activities”). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Applicant shall prepare a monitoring agreement with the Kizh Nation that outlines the roles and responsibilities of the Native American Monitor and shall submit this agreement to the City prior to the issuance of a demolition permit for the Project.

Prior to commencement of ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify Tribal Cultural Resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor is not present at the Project Site on any given workday, ground disturbing activities may continue if the workers involved in such activities attended the training session.

Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting Tribal Cultural Resources. Native American monitoring shall conclude no later than the conclusion of ground disturbing activities.

The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground disturbing activities, the type of construction activities performed, locations of ground disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered Tribal Cultural Resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Applicant and the City upon written request to the Tribe. The Applicant shall not be deemed to be out of compliance with this measure if the Native American Monitor fails to complete or submit any such monitoring logs.

Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	Prior to demolition permit issuance, during construction
Verification Approval Party	City of Torrance

MITIGATION MEASURE

MM TCR-1b: Unanticipated Discovery of a Tribal Cultural Resources. In the event of a discovery of potential Tribal Cultural Resources at the Project site, Native American Monitor (after consultation with the Applicant) shall have the authority to temporarily divert, redirect, or halt ground disturbing activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor, the Applicant shall establish an

TRIBAL CULTURAL RESOURCES

appropriate buffer area of at least 50 feet in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Tribe, and the City to discuss the significance of the find and whether it qualifies as a Tribal Cultural Resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe and the Applicant, the City determines, based on substantial evidence, that the resource is in fact a Tribal Cultural Resource, the Applicant shall develop a reasonable and feasible treatment plan, with input from the Tribe, and with the concurrence of the City's Planning Director. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources.

If the Tribe does not accept a particular recommendation determined to be reasonable and feasible by the Applicant (including, but not limited to, the size of the buffer set forth above), the Tribe may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Applicant; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a Tribal Cultural Resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to Tribal Cultural Resources. The Applicant shall pay all costs and fees associated with the mediator.

The Applicant may recommence ground disturbing activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs. The recovered Native American resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes, or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Tribe nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	During construction
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM TCR-1c: Unanticipated Discovery of Human Remains and Grave Goods. Upon any discovery of human remains and grave goods directly associated with such human remains (Associated Grave Goods), the Tribal Monitor and Applicant will immediately divert work at a minimum of 50 feet and place an exclusion zone around the burial. The Applicant will then notify the Tribe and call the coroner. Work will continue to be diverted until the coroner determines whether the

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	remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner, as mandated by state law, will notify the NAHC, who will then appoint a Most Likely Descendent (MLD).
Responsible Party	Project Owner
Responsible Monitoring Party	City of Torrance
Monitoring Phase/Timing	During construction
Verification Approval Party	City of Torrance
MITIGATION MEASURE	MM TCR-1d: MLD Recommendations for Unanticipated Discovery of Human Remains and Grave Goods. The MLD may make recommendations to the Applicant for means of treating or disposing of, with appropriate dignity, the human remains and any Associated Grave Goods as provided in Public Resources Code Section 5097.98. The Applicant shall discuss and confer with the MLD all reasonable options regarding the preferences for treatment. The preferences of the MLD for treatment may include the following: ■ The nondestructive removal and analysis of human remains and Associated Grave Goods. ■ Preservation of Native American human remains and Associated Grave Goods in place. ■ Relinquishment of Native American human remains and Associated Grave Goods to the MLD for treatment. ■ Other culturally appropriate treatment. Where the following conditions occur, the Applicant or authorized representative shall rebury the Native American human remains and Associated Grave Goods with appropriate dignity on the property in a location not subject to further subsurface disturbance as determined by the Applicant: ■ The NAHC is unable to identify an MLD or the identified MLD fails to make a recommendation within 24 hours after being notified by the NAHC. ■ The Applicant or its authorized representative rejects the recommendation of the MLD and the mediation by the NAHC pursuant to Public Resources Code Section 5097.94(k) fails to provide measures acceptable to the Applicant. In the event that preservation of the human remains and Associated Grave Goods in place is not feasible, the Applicant shall arrange a designated location within the Project Site with appropriate dignity. For the purposes of this Agreement, a location of appropriate dignity on the Project Site includes a location that is buried at a sufficient depth and buried in a such a manner as to ensure that the site is not subject to further subsurface disturbance as determined by the Applicant with input from the MLD. Such location may be under any Project construction or contemplated Project construction as determined by the Applicant. In the event that the Applicant and the MLD agree to a location within the Project Site, the Applicant shall do one or more of the following to protect the location: ■ Record the site with the NAHC or the appropriate Information Center; ■ Utilize a conservation zoning designation or easement; ■ To the extent allowed by law, record a document with the County of Los Angeles entitled "Notice of Reinterment of Native American Remains," which shall include a legal description of the property, the name of the Applicant, and the Applicant's acknowledged signature, in addition to any other information required by this section. The document shall be indexed as a notice under the name of the Applicant.

TRIBAL CULTURAL RESOURCES

If the Applicant and MLD cannot agree to a feasible location within the Project Site, the MLD shall take possession of the human remains for appropriate off-site treatment, as determined by the MLD.

Responsible Party	Project Owner
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Responsible Monitoring Party	City of Torrance
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Monitoring Phase/Timing	During construction
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Verification Approval Party	City of Torrance
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