

COMMENTS AND RESPONSES

The Initial Study/Mitigated Negative Declaration (IS/MND) for 190th Street & Western Avenue Commercial Center project (proposed project) was circulated for a 31-day public review period that began on May 9, 2022 and ended on June 8, 2022. The City of Torrance received two written comments on the IS/MND. The California Environmental Quality Act (CEQA) Guidelines Section 15074(b) requires the decision-making body of the lead agency to consider the proposed IS/MND and comments received during the public review process. The comment letter and response are provided in this document, which has been prepared in accordance with CEQA.

Table 1 lists the public agency that submitted written comments on the IS/MND, along with the page number on which the commenter's letter response appears.

TABLE 1: LIST OF WRITTEN COMMENT LETTERS RECEIVED

Letter No.	Agency/Individual	Date	Response Page No.
1	Los Angeles County Sanitation Districts	June 3, 2022	3
2	California Department of Transportation – District 7	June 8, 2022	10

The body of the comment letter is separated into individual comments, which are numbered. This results in a tiered numbering system.

COMMENT LETTER NO. 1



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

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

June 3, 2022

Ref. DOC 6545964

Mr. Oscar Martinez, Planning and Environmental Manager
Torrance Community Development Department
3031 Torrance Boulevard
Torrance, CA 90503

Dear Mr. Martinez:

NOI Response to 190th Street & Western Avenue Commercial Center Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration (MND) for the subject project on May 11, 2022. The proposed project is located within the jurisdictional boundaries of District No. 5. Previous comments submitted by the Districts to The Kaidence Group in correspondence dated February 27, 2020 (copy enclosed) still apply to the subject project with the following updated information:

1. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 249.8 mgd. | 1-1
2. The expected average wastewater flow from the project site, described in the MND as 11,539 square feet of restaurant uses and 11,400 square feet of restaurant or retail uses, is 22,939 gallons per day. | 1-2

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsd.org.

Very truly yours,

Mandy Huffman

Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh

Enclosure

cc: A. Schmidt
A. Howard

February 27, 2020

Ref. DOC 5567213

Ms. Katie Rounds
Development Director
The Kaidence Group
5070 North 40th Street, Suite No. 210
Phoenix, AZ 85018

Dear Ms. Rounds:

Will Serve Letter for Torrance Commercial Center

The Sanitation Districts of Los Angeles County (Districts) received your will serve letter request for the subject project on February 13, 2020. The proposed project is located within the jurisdictional boundary of District No. 5. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Joint Outfall "D" Unit 2B Trunk Sewer, located in Western Avenue at 178th Street. The Districts' 51-inch diameter lined trunk sewer has a capacity of 20.1 million gallons per day (mgd) and conveyed a peak flow of 12.9 mgd when last measured in 2019. 1-3
2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 261.1 mgd. 1-4
3. The expected average wastewater flow from the project site, described in the application as five commercial buildings totaling 22,420 square feet of primarily restaurants, is 22,420 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the Table 1, Loadings for Each Class of Land Use link. 1-5
4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category 1-6

(e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

1-6
(cont.)

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

1-7

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

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:dc

cc: A. Schmidt
A. Howard

LETTER 1

Mandy Huffman, Environmental Planner
Facilities Planning Department
Los Angeles County Sanitation Districts
1955 Workman Mill Road
Whittier, CA 90601-1400

Response 1-1

This comment states that wastewater generated by the proposed project would be treated at the Joint Water Pollution Control Plant (JWPCP), which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 249.8 mgd.

The IS/MND identifies JWPCP as the wastewater treatment plant that treats wastewater generated by the proposed project and that JWPCP has a capacity of 400 mgd. The IS/MND has been revised to state that JWPCP currently processes an average flow of 249.8 mgd, which leaves an available capacity of 150.2 mgd. Even with the updated information, the amount of wastewater generated by the proposed project would still be less than 0.1 percent of the available capacity at JWPCP. The information provided by this comment does not raise any new significant environmental issues and does not change the impact conclusions. Impacts would remain less than significant.

Response 1-2

This comment states that the expected average wastewater flow from the proposed project is 22,939 gallons per day (gpd).

The proposed project average wastewater flow that is used in the IS/MND (23,720 gpd) is from the City-approved Sewer Area Study, which is higher than the estimate provided by this comment. The estimated wastewater generation presented in the IS/MND represents a more conservative analysis. The information provided by this comment does not raise any new significant environmental issue and does not change the impact conclusions. Impacts would remain less than significant.

Response 1-3

This comment states that wastewater flow originating from the project site would be discharged to a local sewer line for conveyance, which is not maintained by the Los Angeles County Sanitation Districts (Districts), to the Districts' Joint Outfall "D" Unit 2B Trunk Sewer. This trunk sewer has a capacity of 20.1 mgd and conveyed a peak flow of 12.9 mgd when last measured in 2019.

Based on the information provided by Districts, the Joint Outfall "D" Unit 2B Trunk Sewer would have sufficient available sewer capacity to meet the demands of the proposed project. The information provided by this comment does not raise any new significant environmental issues and does not change the impact conclusions. Impacts would remain less than significant.

Response 1-4

This comment states that wastewater generated by the proposed project would be treated at JWPCP, which has a capacity of 400 mgd and currently processes an average flow of 261.1 mgd.

This comment is from the Districts' previous comment letter dated February 27, 2020. The Districts provided updated information in Comment 1-1. See Response 1-1, above, for the updated information.

Response 1-5

The comment states that the expected average wastewater flow from the proposed project would be 22,420 gpd.

This comment is from the Districts' previous comment letter dated February 27, 2020. The Districts provided updated information in Comment 1-2. See Response 1-2, above, for the updated information.

Response 1-6

The comment states that payment of a connection fee may be required before the proposed project is permitted to discharge to the Districts' Sewer System for increasing the strength or quantity of wastewater discharged from connected facilities. The comment also includes information on how to obtain more information regarding the connection fee application procedure and fees, as well as a copy of the Connection Fee Information Sheet.

The applicant is aware of the sewer connection fee and, if an expansion of the sewerage system is necessary to accommodate the proposed project, the applicant will be required to pay the Districts' capital facilities fee to fund said expansion.

Response 1-7

The comment states that the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Government (SCAG). The comment further states that all expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the regional growth forecasts. The available capacity of the Districts' treatment facilities will be limited to levels associated with this regional growth forecast. The letter does not constitute a guarantee of wastewater service but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

The applicant will be made aware of the Districts' intent to provide wastewater services up to the levels that are legally permitted. The existing capacity for the Joint Outfall "D" Unit 2B Trunk Sewer and JWPCP is acknowledged. As discussed in Response to Checklist Question 3.14a of the IS/MND, the proposed project is estimated to generate approximately 90 jobs, which would be within the SCAG employment growth projections for the City. The information provided by the Districts does not raise any new significant environmental issues and does not change the impact conclusions. Impacts to wastewater facilities would remain less than significant.

COMMENT LETTER NO. 2

DEPARTMENT OF TRANSPORTATION

District 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
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*Making Conservation
a California Way of Life.*

June 8, 2022

Oscar Martinez
Torrance Community Development Department
3031 Torrance Boulevard
Torrance CA 90503

RE: 190th Street and Western
Avenue Commercial Center Project
– Mitigated Negative Declaration
(MND)
SCH # 2022050187
GTS # 07-LA-2022-03940
Vic. LA-405/PM: 14.507

Dear Oscar Martinez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced Mitigated Negative Declaration (MND). The Project proposes the development of a new commercial center composed of five one-story commercial buildings for retail and restaurant use, including three restaurant buildings with drive-thru lanes, all situated on a 5.28-acre site. The project would rearrange and consolidate the site, which currently has six parcels, into four parcels. The combined building floor area would total 22,939 square feet (sf) and the outdoor patio areas would total 3,064 sf, resulting in a 0.10 Floor Area Ratio (FAR). The parking area would provide 249 parking spaces. The project will require a Conditional Use Permit to allow the construction of the commercial buildings, and a Division of Lot to rearrange and consolidate six existing parcels into four parcels. The City of Torrance is the Lead Agency under the California Environmental Quality Act (CEQA).

2-1

The Project site is located in the Northwest corner of 190th Street and Western Avenue at 1805, 1875 190th Street and 18925, 18999 Western Avenue. The Project includes a pylon sign that would measure 75' in height and would be situated at the northeast corner of the project site adjacent to Interstate 405 (I-405). Access to the project site is proposed from two new driveways and pedestrian pathways on 190th Street and one new driveway and pedestrian pathway on Western Avenue.

According to the Initial Study, the proposed project would be exempt from a Transportation Impact Analysis (TIA)/ Vehicle Miles Traveled (VMT) Analysis because the proposed project would meet the City's local-serving retail screening criteria threshold of 50,000 square feet; it would be consistent with the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); and would not have an impact on the transit system, bicycle network, or pedestrian network. The request for a TIA

2-2

exemption was submitted to and approved by the City's Traffic Engineer. Thus, a VMT analysis would not be required for the proposed project and the proposed project would not result in significant transportation impacts. Therefore, the proposed project would not conflict with CEQA Guidelines Section 15064.3(b). Impacts would be less than significant, and no mitigation measures would be required.

However, The City requires a Traffic Circulation Analysis (TCA) to be prepared for projects that generate more than 500 new vehicle trips daily. The proposed project would generate 4,740 net trips daily, of which 267 trips would occur during the AM peak hour, 740 trips would occur during the midday peak hour, and 360 trips would occur during the PM peak hour. The TCA determined that buildout of the proposed project would not worsen Level of Service (LOS) along public rights-of-ways and the proposed drive-through lanes on the project site would be contained within the project site and would not adversely affect circulation of public rights-of-way.

2-2
(cont.)

To further improve operations at the study intersections, we have the following comments:

Implement signal timing coordination along 190th Street and Western Avenue and synchronize the traffic signal at 190th Street/Western Avenue with the Caltrans traffic signal at 190th Street/I-405 Southbound ramps during all peak periods. Additionally, we recommend the full ingress/egress access at the West Project Driveway on 190th Street be converted to right-in/right-out access only (No Left Turn). Left turning vehicles on the proposed full ingress/egress access at the West Project Driveway on 190th Street create delays during the midday and PM peak hours.

2-3

We encourage the Lead Agency to evaluate the potential of additional Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For TDM strategies, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). This reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

2-4

Caltrans also encourages the Lead Agency to promote alternative transportation. This will increase accessibility and decrease Greenhouse Gas Emissions, which supports Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment. For additional strategies that will promote equity and environmental preservation, please refer to the 2010 Quantifying Greenhouse Gas Mitigation Measures report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

2-5

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State Highways will need a Caltrans transportation permit. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, including I-405 and SR-213, please submit a construction traffic control plan detailing these issues for Caltrans' review.

2-6

Finally, any work completed on or near Caltrans' right of way may require an encroachment permit. However, the final determination on this will be made by Caltrans' Office of Permits. This work would require additional review and may be subject to additional requirements to ensure current design standards and access management elements are addressed. For more information on encroachment permits, see: <https://dot.ca.gov/programs/traffic-operations/ep>.

2-7

If you have any questions regarding these comments, please contact Ronnie Escobar, the project coordinator, at Ronnie.Escobar@dot.ca.gov, and refer to GTS # 07-LA-2022-03940.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

LETTER 2

Miya Edmonson, LDR/CEQA Branch Chief
California Department of Transportation
District 7 – Office of Regional Planning
100 S. Main Street, MS 16
Los Angeles, CA 90012

Response 2-1

This comment summarizes the proposed project, which is described in the IS/MND.

This comment does not raise any new issues and does not change the impact conclusions of the IS/MND.

Response 2-2

This comment summarizes the Transportation Impact Analysis/Vehicle Miles Traveled Analysis and the Traffic Circulation Analysis (TCA) in the IS/MND.

This comment does not raise any new issues and the impact conclusions would remain the same. Impacts would remain less than significant.

Response 2-3

This comment suggests that signal timing coordination along 190th Street and Western Avenue be implemented and that the traffic signal at the 190th Street/Western Avenue intersection be synchronized with the California Department of Transportation (Caltrans) traffic signal at 190th Street/I-405 southbound ramps during all peak periods. The comment also recommends the full ingress/egress access at the west project driveway on 190th Street be converted to right-in/right-out access only (no left-turn) because left turning vehicles on the proposed full ingress/egress access at the west project driveway on 190th Street will create delays during the midday and PM peak hours.

Implementing traffic signal coordination along 190th Street and Western Avenue would provide additional gaps in traffic between intersections. The recommendation to implement signal timing coordination along 190th Street and Western Avenue and to synchronize the traffic signal at 190th Street/Western Avenue with the Caltrans traffic signal at 190th Street/I-405 southbound ramps during all peak periods is included in the City-approved TCA for the proposed project and would be included as part of the proposed project.

Conversion of the full ingress/egress access at the west project driveway on 190th Street to right-in/right-out access only (no left turn) is not recommended because the right-in/right-out access only would eliminate direct access to the project site for eastbound vehicles. Since eastbound U-turn is prohibited at the 190th Street/Western Avenue intersection, eastbound vehicles would be forced to make a U-turn beyond the intersection to access the project site. As discussed in the IS/MND and the TCA, the left-turn vehicle outbound (egress) of the West Project Driveway during the midday and PM peak hours are expected to operate at level of service (LOS) E, but this LOS would only affect internal traffic within the project site and would not occur within the 190th Street right-of way. All movements outside of the project site are expected to operate at LOS B or better.

The information provided by this comment does not raise any new significant environmental issue and the impact conclusions would remain the same. Impacts would remain less than significant.

Response 2-4

The comment suggests the Lead Agency to evaluate the potential of additional Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

The City implements a TDM program and ITS throughout the City. Torrance Municipal Code Division 9, Chapter 10 (Trip Reduction and Traffic Management) is the City's TDM ordinance. The ordinance requires new non-residential development that is 25,00 square feet or more in size to incorporate TDM strategies. As the proposed project would be 22,939 square feet in size, the proposed project is not required to implement TDM strategies in the TDM ordinance. However, the proposed project includes a component that is consistent with one of TDM strategies identified in the TDM ordinance. The proposed project would provide 11 short-term bicycle parking spaces, eight long-term bicycle parking spaces that would be provided in four double bicycle lockers, and one bicycle storage space.

The City's Traffic Impact Analysis (TIA) Guidelines provides a list of TDM strategies that land use projects would implement to reduce VMT if the TIA identifies significant VMT impacts. The TDM strategies that land use projects implement are required to be approved by the City. As discussed in Response to Checklist Question 17(a) of the IS/MND, the proposed project is exempt from preparing a TIA and would not have a significant impact on VMT. Therefore, additional TDM strategies beyond what is required by the City is not needed to further reduce VMT.

City has been utilizing ITS applications throughout the City. One approach that the City has undertaken to improve traffic flow is signal synchronization. The proposed project does not include any elements that would conflict with the City's ITS. The proposed project would implement signal timing coordination along 190th Street and Western Avenue and synchronize the traffic signal at 190th Street/Western Avenue with the Caltrans traffic signal at 190th Street/I-405 southbound ramps during all peak hours. This project component is consistent with the City's ITS applications.

The proposed project would comply with all TDM strategies and ITS applications required by the City. The information provided by this comment does not raise any new significant environmental issue and the impact conclusion would remain the same. Impacts would remain less than significant.

Response 2-5

The comment states that Caltrans encourages the Lead Agency to promote alternative transportation, which would increase accessibility and decrease greenhouse gas emissions (GHG). Encouraging alternative transportation would support Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment.

The City of Torrance promotes alternative transportation. As discussed in the City of Torrance General Plan Circulation and Infrastructure Element, the City coordinate efforts to improve alternative transportation services and facilities to provide residents with a wide range of alternatives to the automobile. The General Plan Circulation and Infrastructure Element also identifies 190th Street adjacent to the project site as a location for a future bikeway. As discussed in Response to Checklist Question 17(a) of the IS/MND, the proposed project would not conflict with the City's General Plan Circulation and Infrastructure Element objectives and policies that support alternative transportation modes. The proposed project would not alter the sidewalks surrounding the project site, and all sidewalks would remain operable with implementation of the

proposed project. The existing transit lines that serve the project site would not be altered by the proposed project and would serve the project site and the surrounding area. The proposed project does not include elements that would interfere with these transit line services. Additionally, the proposed project would not modify 190th Street in a manner that would preempt the development of a bikeway along 190th Street.

As discussed in Response to Checklist Question 8(a) of the IS/MND, the proposed project would meet CALGreen requirements, which lays out minimum requirements for newly constructed buildings in California to reduce GHG emissions. In compliance with CALGreen requirements, the proposed project would provide bicycle stalls for short-term and long-term bicycle parking. The proposed project does not include elements that would conflict with alternative transportation. The information provided by this comment does not raise any new significant environmental issue and the impact conclusions would remain the same. Impacts would remain less than significant.

Response 2-6

The comment is a reminder that a Caltrans transportation permit is required for any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways. The comment also recommends that the proposed project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, including I-405 and SR-213, a construction traffic control plan needs to be submitted for Caltrans' review.

The project applicant will comply with all Caltrans requirements, including obtaining a Caltrans transportation permit if any heavy construction equipment and/or materials that require the use of oversized-transport vehicles would be transported on the State highways, as well as submitting a construction traffic control plan to Caltrans for the agency's review and approval if construction traffic would cause issues on any State highways, including I-405 and SR-213.

Response 2-7

The comment states that any work completed on or near the Caltrans' right-of-way may require an encroachment permit. The final determination on the encroachment permit will be made by the Caltrans' Office of Permits. The encroachment permit would require additional review and may be subject to additional requirements to ensure current design standards and access management elements are addressed. The comment also provides a website to obtain more information on encroachment permits.

The applicant will be made aware of Caltrans' encroachment permit requirement. The applicant will comply with all Caltrans' standards and requirements.