

## ENVIRONMENTAL CHECKLIST

*Addendum to the 2000 City of Torrance Mitigated Negative Declaration for  
the Toyota South Campus Plan Project (SCH No. 2000101085)*

### 1. AESTHETICS

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Have a substantial adverse effect on a scenic vista?						X
b) Substantially damage visible scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?						X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?						X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?					X	

***Substantiation:***

a – c) *No Impact.*

**2000 MND Conclusions:** As stated with the 2000 MND, the subject site is located within an industrial area, and its development would not affect any scenic vistas. The 2000 MND notes further that the office buildings proposed by the Original Project would incorporate landscaping acting to enhance views of the subject site (2000 MND, p. 3) Accordingly, the 2000 MND concluded that there was no potential for the Original Project to: a) Have a substantial adverse effect on a scenic vista; b) substantially damage visible scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; or c) substantially degrade the existing visual character or quality of the site and its surroundings.

**2000 MND Mitigation Measures:** None.

**Modified Project:** The Modified Project Site comprises paved vehicle service/staging areas located within an industrialized urban area. The Modified Project does not propose elements that would affect scenic vistas or scenic resources within a designated scenic highway. As with the Original Project, the Modified Project would incorporate internal and perimeter landscape/hardscape features acting to screen views of the developed site, enhancing visual perception of the Modified Project site specifically and vicinity properties generally. All final designs of the Modified Project facilities, including but not limited to the proposed buildings and landscape/hardscape features would conform to all applicable City design standards, and would be subject to City review and approval. This would ensure that the Modified Project would not substantially degrade the existing visual character or quality of the site and its surroundings. On this basis, the proposed Modified Project impacts to scenic vistas, scenic resources, and the existing visual character or quality of the area would be the same as those identified within the 2000 MND.

**Modified Project Mitigation Measures:** None.

d) *No Changes or New Information Requiring Preparation of an MND or EIR.*

**2000 MND Conclusions:** The 2000 MND recognized that development of the site would introduce new sources of light and glare and noted that any light/glare impacts of the Original Project would not substantively affect ambient conditions and would therefore be less-than-significant.

**2000 MND Mitigation Measures:** None.

**Modified Project:** Final design, configuration, and orientation of lighting features and fixtures under the Modified Project would be subject to City review and approval, acting to ensure that Modified Project lighting would be compatible with, and would complement, architectural and site designs; and further that Modified Project lighting would be compatible with and would not adversely affect off-site land uses. Properties adjacent to the site are developed with light industrial/business park uses evidencing

urban light sources. Additionally, adjacent streets and properties are illuminated with streetlights and carry nighttime traffic. It is not anticipated that lighting proposed by the Modified Project would substantively alter these area ambient lighting conditions.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased aesthetic impacts would occur as a result of the Modified Project.

*Sources:* 2000 MND for the Toyota South Campus Plan Project (City of Torrance) November 17, 2000; Torrance Technology Park Design Concepts.

## 2. AGRICULTURE AND FOREST RESOURCES

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR or EIR	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?						X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?						X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?						X
d) Result in the loss of forest land or conversion of forest land to non-forest use?						X

	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR or EIR	No Impact
Would the project: e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use?						X

**Substantiation:**

a) *No Impact.*

**2000 MND Conclusions:** The 2000 MND notes that the subject site does not contain farmlands or agricultural uses, and further that the Original Project does not propose or require conversion of agricultural land. On this basis, the 2000 MND concluded that the Original Project had no potential to result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively, “Farmlands”) to non-agricultural use (2000 MND, p. 3).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Agricultural resources conditions at the subject site have not changed since preparation of the 2000 MND. As with the Original Project site, the Modified Project Site is not designated Farmlands. More specifically, the Modified Project Site is developed with improved/paved surfaces and currently provides limited functions for transitional vehicle staging and servicing in support of the encompassing Toyota Campus business park uses. No changed or new information has been identified to indicate that any potential Farmland impacts resulting from the Modified Project would be different from those previously determined. The Modified Project would have no impact in this regard.

**Modified Project Mitigation Measures:** None.

b) *No Impact.*

**2000 MND Conclusions:** The 2000 MND notes that the subject site does not contain farmlands or agricultural uses, and further that the Original Project does not propose or require conversion of agricultural land. On this basis, the 2000 MND determined that the Original Project uses would not conflict with any agricultural zoning or contracts, and that no portion of the site was currently in agricultural use or under a Williamson Act contract (2000 MND, p. 3).

**2000 MND Mitigation Measures:** None

**Modified Project:** Agricultural resources conditions at the subject site have not changed since preparation of the 2000 MND. The Modified Project Site is currently designated as Business Park (I-BP) by the City General Plan and is zoned Heavy Manufacturing (M2). No Williamson Act contracts are in place for the subject site. The Modified Project would therefore have no impact on, and would not conflict with, any existing agricultural zoning designations, or any existing Williamson Act contract(s). The Modified Project would have no impact in this regard.

**Modified Project Mitigation Measures:** None.

c) *No Impact.*

**2000 MND Conclusions:** This environmental topical concern has been added to the *CEQA Guidelines Appendix G, Environmental Checklist Form* since the adoption of the 2000 MND and was therefore was not specifically addressed in the 2000 MND.

**2000 MND Mitigation Measures:** N/A

**Modified Project:** Agricultural resources conditions at the subject site have not changed since preparation of the 2000 MND. The Modified Project Site is not zoned for forest land, timberland, or timberland zoned Timberland Production. The Modified Project would therefore have no impact on forest land or timberland.

**Modified Project Mitigation Measures:** None.

d) *No Impact.*

**2000 MND Conclusions:** Similar to Checklist Item c, above, this question has been added to the *CEQA Guidelines Appendix G, Environmental Checklist Form* since the adoption of the 2000 MND and was therefore not specifically addressed in the 2000 MND.

**2000 MND Mitigation Measures:** N/A

**Modified Project:** Agricultural resources conditions at the subject site have not changed since preparation of the 2000 MND. No forest land is located on the Modified Project site or in the vicinity. The Modified Project would therefore have no impact on forest land.

**Modified Project Mitigation Measures:** None.

e) *No Impact.*

**2000 MND Conclusions:** The 2000 MND notes that the subject site does not contain Farmlands or agricultural uses, and further that the Original Project does not propose or require conversion of agricultural land. On this basis, the 2000 MND determined that the Original Project uses would not involve other changes in the existing environment that could result in conversion of Farmlands to non-agricultural use (2000 MND, p. 3)

**2000 MND Mitigation Measures:** None

**Modified Project:** Agricultural resources conditions at the subject site have not changed since preparation of the 2000 MND. As with the Original Project, the Modified Project does not require or propose other changes to the environment which could result in the conversion of farm land or forest land to other uses. The Modified Project would therefore have no impact on the existing environment that could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased agricultural resources impacts would occur as a result of the Modified Project.

**Sources:** *Toyota South Campus Plan Mitigated Negative Declaration* (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.

### 3. AIR QUALITY

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?					X	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?					X	
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?					X	
d) Expose sensitive receptors to substantial pollutant concentrations?						X
e) Create objectionable odors affecting a substantial number of people?						X

**Substantiation:**

a) *No Changes or New Information Requiring Preparation of an MND or EIR.*

**2000 MND Conclusions:** The 2000 MND determined that the Original Project would result in significant impacts related to the potential to conflict with, or obstruct implementation of, the applicable air quality plan (2000 MND, pp. 3 – 4). The 2000 MND noted however that the Original Project would not result in significant and unavoidable air quality impacts not already identified in the 1992 City of Torrance

General Plan Final EIR and recognized in the City General Plan EIR Statement of Overriding Consideration (SOC) addressing significant air quality impacts.<sup>1</sup>

**2000 MND Mitigation Measures:** None

**Modified Project:** Criteria for determining consistency with the applicable Air Quality Management Plan (AQMP) are presented below:

- **Criterion No. 1:** The project under consideration will not result in an increase in the frequency or severity of existing NAAQS/CAAQS air quality violations or cause or contribute to new NAAQS/CAAQS violations; or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Criterion No. 2:** The project under consideration will not exceed the assumptions in the AQMP or increments based on the years of Project build-out phase.

As substantiated in these discussions, the Modified Project uses would not result in any potentially significant air quality impacts. Additionally, incorporation of contemporary energy-efficiency/energy conservation technologies and operational programs; and compliance with SCAQMD emissions reductions and control requirements would act to reduce stationary-source air emissions resulting from the Modified Project. These Modified Project attributes and features are consistent with and support AQMP air pollution reduction strategies and promote timely attainment of AQMP air quality standards. Based on the preceding discussion, the Modified Project is determined to be consistent with the Criterion No. 1.

The AQMP assumptions reflect development within the South Coast Air Basin that conforms to adopted General Plans or other established land use plans. The Modified Project does not propose or require any change in City of Torrance General Plan Land Use designations, nor any increase in development intensity beyond that currently anticipated for the subject site under the City General Plan. On this basis, the Modified Project would conform to Criterion No. 2.

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<sup>1</sup> Similarly, the 2009 General Plan Update EIR concluded that implementation of the General Plan would result in significant and unavoidable AQMP air quality impacts (General Plan EIR, p. 6-1, et al.).



Based on the preceding, the Modified Project would not conflict with or obstruct implementation of the AQMP.

**Modified Project Mitigation Measures:** None.

b, c) *No Changes or New Information Requiring Preparation of an MND or EIR.*

**2000 MND Conclusions:** The 2000 MND determined that the Original Project's potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation; or 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 would be significant (2000 MND, pp. 3 – 4).

The 2000 MND noted however that the Original Project would not result in significant air quality impacts not already identified in the 1992 City of Torrance General Plan Final EIR; and recognized in the City General Plan EIR Statement of Overriding Consideration (SOC) addressing significant air quality impacts.<sup>2</sup>

**2000 MND Mitigation Measures:** None.

**Modified Project:**

***Construction-Source Air Quality Impacts***

It is assumed that mass grading and construction activities for facilities that would be implemented under the Modified Project would parallel the time frames and the scope of construction activities reflected and evaluated in the 2000 MND analysis, with comparable peak construction-source emissions impacts. More likely however, contemporary construction techniques and current construction equipment emissions controls required of the Modified Project would result in comparative reductions in peak construction-source emissions. Construction-source air pollutant emissions

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<sup>2</sup> Similarly, the 2009 General Plan Update EIR concluded that implementation of the General Plan would result in significant and unavoidable criteria pollutant (volatile organic compounds [VOC], carbon monoxide [CO], oxides of nitrogen [NO<sub>x</sub>], particulate matter [PM<sub>10</sub> and PM<sub>2.5</sub>] and ozone [O<sub>3</sub>]) air quality impacts (General Plan EIR, p. 6-1, et al.).

resulting from the Modified Project would therefore not result in any significant air quality impacts.

### Operational-Source Air Quality Impacts

The AQ/GHG Analysis quantifies and compares operational-source criteria pollutant emissions of the Original Project General Office uses and the Modified Project uses. Criteria pollutant emissions were modeled employing the latest version of the California Emissions Estimator Model™ (CalEEMod™ v2016.3.2). Emissions modeling outputs are appended/attached to the AQ/GHG Analysis.

Maximum daily operational-source criteria pollutant emissions generated by operations of the Modified Project are summarized at Table 3-1. As indicated, criteria pollutant emissions generated by operations of the Modified Project would not exceed any applicable South Coast Air Quality Management District (SCAQMD) regional thresholds of significance.

**Table 3-1**  
**Comparison of Maximum Daily Operational-Source Emissions**

Summer Scenario	Maximum Daily Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Modified Project	12.75	<b>48.16</b>	55.58	0.26	18.16	5.10
Original Project General Office Uses	<b>16.07</b>	39.52	<b>107.98</b>	<b>0.32</b>	<b>23.88</b>	<b>6.69</b>
SCAQMD Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Winter Scenario	Maximum Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Modified Project	12.63	<b>48.98</b>	51.43	0.25	18.16	5.11
Original Project General Office Uses	<b>15.73</b>	40.54	<b>101.63</b>	<b>0.31</b>	<b>23.88</b>	<b>6.69</b>
SCAQMD Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

**Source:** Torrance Technology Park Air Quality & Greenhouse Gas Memorandum (Urban Crossroads, Inc.) February 2, 2018.

**Notes:** Maximum for each criteria pollutant is indicated in **bold**.

As summarized at Table 3-1, with the exception of NO<sub>x</sub> emissions, total peak criteria air pollutant emissions generated by the Modified Project would be incrementally reduced when compared to criteria air pollutant emissions generated by the Original Project General Office uses.

Based on the preceding, operational-source criteria air pollutant emissions resulting from the Modified Project would not result in any significant air quality impacts.

**Modified Project Mitigation Measures:** None.

d) *No Impact.*

**2000 MND Conclusions:** The 2000 MND concluded that the Original Project would have no potential to expose sensitive receptors to substantial pollutant concentrations (2000 MND, p. 4).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Because the Modified Project uses could potentially generate heavy-duty truck traffic, a Health Risk Assessment (HRA) was prepared as one component of the AQ/GHG Analysis. The HRA evaluated non-cancer and cancer risks that could result from Diesel Particulate Matter (DPM) emissions generated truck traffic accessing the Modified Project.

The greatest potential for exposure to these DPM emissions would occur at the industrial buildings abutting the Modified Project Site to the north. At greater distances from the Modified Project uses, DPM emissions concentrations would dissipate, and potential health risks associated with exposure to DPM emissions would be decreased.

At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to the DPM emissions generated by the Modified Project uses is estimated at 3.53 in one million, which is less than the SCAQMD threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.001, which would not exceed the applicable SCAQMD threshold of 1.0. As such, the Modified Project uses

would not cause a significant human health or cancer risk. The Modified Project uses do not otherwise comprise facilities or operations that would generate emissions or emissions concentrations that would substantively affect sensitive receptors (AQ/GHG Analysis, p. 5).

Based on the preceding, as with the Original Project, the Modified Project would not expose sensitive receptors to substantial pollutant concentrations.

**Modified Project Mitigation Measures:** None.

e) *No Impact.*

**2000 MND Conclusions:** The 2000 MND determined that there was no potential for the Original Project to create objectionable odors affecting a substantial number of people (2000 MND, p. 3)

**2000 MND Mitigation Measures:** None.

**Modified Project:** Temporary and intermittent odor releases may occur during construction of Modified Project uses. Potential construction-source odors include but are not limited to diesel exhaust, asphalt/paving materials, glues, paint, and other architectural coatings.

The Modified Project does not propose facilities or on-going operations that would create objectionable odors affecting a substantial number of people. Construction-source and operational-source odor impacts are controlled as a byproduct of hazardous/potentially hazardous materials handling plans and Best Management Practices implemented under SCAQMD Rule 402 et al. The Project would comply with all SCAQMD Rules regulating and controlling odors and odor sources.

Based on the preceding, and as with the Original Project, the Modified Project would have no potential to create objectionable odors affecting a substantial number of people.

**Modified Project Mitigation Measures:** None.

As summarized in the preceding discussions, air pollutant emissions generated by the Modified Project would not exceed applicable SCAQMD thresholds. Nor would the Modified Project otherwise generate or result in air pollutant emissions or air pollutant emissions concentrations that would result in potentially adverse impacts.

Moreover, in comparison to the Original Project, air quality impacts in the aggregate would be diminished under the Modified Project. The City’s previous SOC regarding significant air quality impacts resulting from the Original Project would, if anything, likely overstate the significance of air quality impacts attributable to the Modified Project.

**Sources:** *Toyota South Campus Plan Mitigated Negative Declaration* (City of Torrance) October 17, 2000; *Torrance Technology Park Air Quality & Greenhouse Gas Memorandum* (Urban Crossroads, Inc.) February 2, 2018; Subsequent CalEEMod Industrial Park modeling (Urban Crossroads, Inc.) February 26, 2018; *Torrance Technology Park Design Concepts*.

#### 4. BIOLOGICAL RESOURCES

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Have a substantial adverse effect, either directly or through habitat modification, 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 Game or U.S. Fish and Wildlife Service?						X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies and regulations; or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?						X

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?						X
d) 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?						X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?						X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?						X

**Substantiation:**

a) *No Impact.*

**2000 MND Conclusions:** The 2000 MND noted that the Conservation Element of the 1992 Torrance General Plan and the 1992 General Plan EIR do not identify any threatened or endangered species in the City of Torrance.<sup>3</sup> The 2000 MND notes further that the Original Project site is not a wetland area and is not used by wildlife. On this basis, the 2000 MND concluded that the Original Project would have no impact on any candidate, sensitive, or special status species (2000 MND, pp. 4 – 5).

<sup>3</sup> As also discussed in the 2009 General Plan EIR, continued absence of protected habitat or threatened or protected species is representative of conditions within the majority of the City (2009 General Plan EIR, p. 5.3-3). Limited areas of the City considered to be potentially significant habitat or that could potentially accommodate threatened or endangered species are precluded from development (2009 General Plan EIR, pp. 5.3-13 – 5.3-15).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Biological resources conditions at the subject site have not changed since preparation of the 2000 MND. Consistent with the summary analysis presented in the 2000 MND, the subject site remains devoid of threatened or endangered species. Nor does the subject site evidence wetlands or accommodate wildlife or wildlife movement. The Modified Project Site has been heavily disturbed and is located in a largely urbanized area bordered by development on all sides. No candidate, sensitive, or special status species have been identified on the Modified Project Site. Nor does the Modified Project propose or require uses or facilities that would result in potentially significant impacts to offsite candidate, sensitive, or special status species. As with the Original Project, the Modified Project would have no potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species.

**Modified Project Mitigation Measures:** None.

b, c) *No Impact.*

**2000 MND Conclusions:** The 2000 MND noted that the Conservation Element of the 1992 Torrance General Plan and the 1992 General Plan EIR do not identify any threatened or endangered species in the City of Torrance.<sup>4</sup> The 2000 MND notes further that the Original Project site is not a wetland area and is not used by wildlife. On this basis, the 2000 MND determined that the Original Project would have no impact on riparian habitat, sensitive natural community, or federally protected wetlands (2000 MND, pp. 4 – 5).

**2000 MND Mitigation Measures:** None

**Modified Project:** Biological resources conditions at the subject site have not changed since preparation of the 2000 MND. Consistent with the summary analysis presented in the 2000 MND, the subject site remains devoid of threatened or endangered species.

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<sup>4</sup> Ibid.

Nor does the subject site evidence wetlands or accommodate wildlife or wildlife movement. The Modified Project site has been heavily disturbed. Riparian habitat, sensitive natural community, or federally protected wetlands do not exist within the subject site. Nor does the Modified Project propose or require uses or facilities that would result in potentially significant impacts to offsite riparian habitat, sensitive natural community, or federally protected wetlands. As with the Original Project, the Modified Project would have no potential to have a substantial adverse effect on any riparian habitat, sensitive natural community, or federally protected wetlands.

**Modified Project Mitigation Measures:** None.

d) *No Impact.*

**2000 MND Conclusions:** The 2000 MND noted that the Conservation Element of the 1992 Torrance General Plan and the 1992 General Plan EIR do not identify any threatened or endangered species in the City of Torrance.<sup>5</sup> The 2000 MND notes further that the Original Project site is not a wetland area and is not used by wildlife. On this basis, the 2000 MND concluded that the Original Project would have no impact on fish or wildlife movement or wildlife migratory corridors (2000 MND, pp. 4 – 5).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Biological resources conditions at the subject site have not changed since preparation of the 2000 MND. Consistent with the summary analysis presented in the 2000 MND, the subject site remains devoid of threatened or endangered species. Nor does the subject site evidence wetland or accommodate wildlife or wildlife movement. As previously mentioned, the Modified Project site has been heavily disturbed and is located in an urbanized area bordered by development on all sides, substantively constraining wildlife movement in the area. No designated migratory corridors or linkages exist within or traverse the subject site. Nor is there evidence that the Modified Project site otherwise functions as a movement corridor for fish or wildlife movement. The Modified Project site is designated for industrial/business park uses, does not function as, nor is intended to function as a native wildlife nursery site. Nor

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<sup>5</sup> Ibid.



does the Modified Project propose or require uses that would discernibly affect off-site wildlife movement, wildlife migratory corridors, or wildlife nursery sites. On this basis, as with the Original Project there is no potential for the Modified Project to 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.

**Modified Project Mitigation Measures:** None.

e, f) *No Impact.*

**2000 MND Conclusions:** The 2000 MND concluded that the Original Project would have no potential to conflict with any local policies or ordinances protecting biological resources; or to conflict with an adopted Habitat Conservation Plan, Natural Community Plan, or other approved local, regional, or state habitat conservation plan (2000 MND, pp. 4 – 5).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Biological resources conditions at the subject site have not changed since preparation of the 2000 MND. Consistent with the summary analysis presented in the 2000 MND, there are no biologically significant resources within the Modified Project Site; nor are there any local or area-wide preservation or conservation plans or policies applicable to the subject site. As with the Original Project, there is no potential for the Modified Project to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased biological resources impacts would occur as a result of the Modified Project.

**Sources:** *City of Torrance 1992 General Plan EIR; Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.*

**5. CULTURAL RESOURCES**

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?						X
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5?						X
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?						X
d) Disturb any human remains, including those interred outside of formal cemeteries?						X

**Substantiation:**

a – d) *No Impact.*

**2000 MND Conclusions:** The 2000 MND noted that per the 1992 Torrance General Plan and 1992 General Plan EIR, there is no evidence of historic resources, archaeological resources, paleontological resources, unique geologic features, or presence of human remains at the Original Project site. The 2000 MND therefore concluded that the Original Project would have no impact on historic, archaeological, or paleontological resources; and further that the Original Project had no potential to disturb any human remains (2000 MND, p. 5).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Cultural resources conditions at the subject site and the surrounding area have not changed since the preparation of the 2000 MND. That is, the area remains devoid of any evident historic resources, archaeological resources, paleontological resources, unique geologic resources, or presence of human remains. Moreover, the subject site has been heavily disturbed by past human activities and is currently developed with paved surfaces and is used for vehicle staging and maintenance. Any cultural resources that may have been present at one time have likely been destroyed.

To confirm the continued absence of potentially significant cultural resources, at the direction of the Lead Agency, the Applicant has requested, and has received a current (November 2017) California Historical Resources Information System (CHRIS) Records Search for the Modified Project Site.<sup>6</sup> The CHRIS Records Search identified no known potentially significant cultural resources within the Modified Project Site. The CHRIS Records Search also provides recommendations for monitoring of construction activities to ensure that as yet unknown cultural resources that may be encountered be protected/preserved as may be required by the Lead Agency. The Applicant would comply with recommendations of the CHRIS Records Search as required by the Lead Agency pursuant to the Project Conditions of Approval.

As with the Original Project, there is no substantiated potential for the Modified Project to cause or result in an adverse change in historic resources, archaeological resources, paleontological resources, unique geologic features, or to disturb human remains.

No new or substantially increased cultural resources impacts would occur under the Modified Project.

**Modified Project Mitigation Measures:** None.

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<sup>6</sup> South Central Coastal Information Center (SCCIC) File # 18297.4314, 11/27/2017; available through the City of Torrance Planning Division.

As substantiated by the preceding discussions, no new or substantially increased cultural resources impacts would occur as a result of the Modified Project.

*Sources: Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.*

## 6. GEOLOGY AND SOILS

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:						
(i) rupture of a known earthquake fault; (ii) strong seismic ground shaking;					X	
(iii) seismic-related ground failure, including liquefaction; or (iv) landslides?						X
b) Result in substantial soil erosion or the loss of topsoil?						X
c) 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?						X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?						X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?						X

***Substantiation:***

(a) *i, ii) No Changes or New Information Requiring Preparation of an MND or EIR.*

**2000 MND Conclusions:** The 2000 MND recognizes location of the City of Torrance within a seismically active area, and that potential impacts related to rupture of a known earthquake fault and/or strong seismic shaking are adequately addressed through compliance with applicable provisions of the Uniform Building Code (UBC). On this basis, the 2000 MND determined that impacts due to rupture of a known earthquake fault or strong seismic ground-shaking would be less-than-significant (2000 MND, pp. 5 – 6).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Underlying geology/soils conditions at the subject site and the surrounding area have not changed since the preparation of the 2000 MND. No active or potentially active faults are known to exist at the site. In addition, the subject site does not lie within an Alquist-Priolo Earthquake Fault Zone.

As part of the City's standard review and approval of development projects, the Modified Project is required to comply with requirements of a final City-approved geotechnical report, and applicable provisions of the UBC and California Building Code (CBC). All final plans would be required to incorporate design- and site-appropriate means to avoid or minimize any fault rupture or seismic shaking concerns. The Modified Project would therefore not result in new, additional, or different fault rupture or seismic ground shaking impacts than were considered and addressed in the 2000 MND.

**Modified Project Mitigation Measures:** None.

(a) *iii) No Impact.*

**2000 MND Conclusions:** The 2000 MND noted that the Original Project would be subject to approval of a grading permit, thereby ensuring conformance with the

requirements of the Torrance Municipal Code and the UBC with regard to soil compaction and drainage. On this basis, the 2000 MND determined that there was no potential for the Original Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction (2000 MND, pp. 5 – 6).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Underlying geology/soils conditions at the subject site and the surrounding area have not changed since the preparation of the 2000 MND. As with the Original Project, the Modified Project would conform with the requirements of the Torrance Municipal Code and the UBC with regard to soil compaction and drainage. As with the Original Project, the Modified Project would therefore have no potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

**Modified Project Mitigation Measures:** None.

*(a) iv) No Impact.*

**2000 MND Conclusions:** The 2000 MND notes that the subject site is level and that any proposed grading would not substantively affect existing topographic conditions. On this basis, the 2000 MND concluded that there was no potential for the Original Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. (2000 MND, pp. 5 – 6).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Topographic conditions at the subject site and the surrounding area have not changed since the preparation of the 2000 MND. Moreover, the subject site and surrounding properties are substantively developed with improved/paved surfaces and buildings and are essentially level and exhibit little or no topographic relief. There is no evidence of recent or historic landslides affecting the subject site or vicinity properties. As with the Original Project, the Modified Project would have no potential to expose

people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

**Modified Project Mitigation Measures:** None.

b) *No Impact.*

**2000 MND Conclusions:** The 2000 MND notes that potential erosion impacts of the Original Project would be controlled by standard measures imposed in conjunction with the issuance of a grading permit. On this basis, the 2000 MND concluded that the Original Project would have no potential to result in substantial erosion or the loss of topsoil.

**2000 MND Mitigation Measures:** None

**Modified Project:** The subject site and surrounding properties are substantively developed with improved/paved surfaces and buildings, diminishing the potential for erosion or soil loss impacts. As with the Original Project, potential erosion and soil loss impacts resulting from the Modified Project would be controlled by standard measures imposed in conjunction with the issuance of a grading permit. On this basis, as with the Original Project, the Modified Project would have no potential to result in substantial soil erosion or the loss of topsoil.

**Modified Project Mitigation Measures:** None.

c, d) *No Impact.*

**2000 MND Conclusions:** The 2000 MND noted that the Original Project would be subject to approval of a grading permit, thereby ensuring conformance with the requirements of the Torrance Municipal Code and the UBC with regard to soil compaction and drainage. On this basis, the 2000 MND concluded that the Original Project would have no potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Original Project; or be located on expansive soil, creating substantial risks to life or property.

**2000 MND Mitigation Measures:** None.

**Modified Project:** The subject site and surrounding properties are substantively developed with improved/paved surfaces and buildings, evidencing absence of substantive constraints regarding unstable surface or subsurface conditions. As with the Original Project, the Modified Project would be subject to approval of a grading permit, thereby ensuring conformance with the requirements of the Torrance Municipal Code and the UBC with regard to soil compaction and drainage. On this basis, as with the Original Project, the Modified Project would have no potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Original Project; or be located on expansive soil, creating substantial risks to life or property.

**Modified Project Mitigation Measures:** None.

e) *No Impact.*

**2000 MND Conclusions:** Sewers were available to the Original Project, and the Original Project did not propose or require septic tanks or other alternative wastewater systems. The 2000 MND concluded that the Original Project would result in no impacts regarding soils supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available.

**2000 MND Mitigation Measures:** None.

**Modified Project:** As with the Original Project, the Modified Project would connect to the City's sanitary sewer system. No septic tanks or other alternative wastewater disposal systems are proposed. On this basis, the Modified Project would have no impacts relative to septic tanks or alternative waste water disposal systems.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased geology/soils impacts would occur as a result of the Modified Project.



*Sources: Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.*

**7. GREENHOUSE GAS EMISSIONS**

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?					X	
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?					X	

**Substantiation:**

a) *No Changes or New Information Requiring Preparation of an MND or EIR.*

**2000 MND Conclusions:** The environmental topic of Greenhouse Gas (GHG) emissions was added to the *CEQA Guidelines Appendix G, Environmental Checklist Form* in 2010. Evaluation of the potential for the Original Project to generate GHG emissions that may have a significant impact on the environment was therefore not included in the 2000 MND.

**2000 MND Mitigation Measures:** N/A

**Modified Project:** GHG emissions impacts of the Original Project General Office uses, and the Modified Project are compared within the following discussions. GHG emissions were modeled employing the latest version of the California Emissions Estimator Model™ (CalEEMod™ v2016.3.2). Emissions modeling outputs are appended/attached to the AQ/GHG Analysis.

The Original Project General Office uses would generate an estimated 6,260.01 metric tons of carbon dioxide equivalent/year (MTCO<sub>2</sub>e/year) (AQ/GHG Analysis, p. 4). GHG emissions generated by the Original Project General Office uses would not exceed the applicable SCAQMD screening level threshold of 10,000 MTCO<sub>2</sub>e/year and would therefore be less-than-significant.

The Modified Project uses would generate an estimated 6,513.09 metric tons of carbon dioxide equivalent/year (MTCO<sub>2</sub>e/year) (AQ/GHG Analysis Attachment A, Annual Modeling, p. 4). GHG emissions generated by the Modified Project uses would not exceed the applicable SCAQMD screening level threshold of 10,000 MTCO<sub>2</sub>e/year and would therefore be less-than-significant.

Under either the Original Project or the Modified Project, GHG emissions would not exceed the applicable SCAQMD screening-level threshold and would therefore be less-than-significant.

**Modified Project Mitigation Measures:** None.

b) *No Changes or New Information Requiring Preparation of an MND or EIR.*

**2000 MND Conclusions:** The environmental topic of GHG emissions was added to the *CEQA Guidelines Appendix G, Environmental Checklist Form* in 2010. Evaluation of the potential for the Original Project to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases was therefore not included in the 2000 MND.

**2000 MND Mitigation Measures:** N/A

**Modified Project:** The City of Torrance has not yet adopted plans policies or regulations for the purpose of reducing GHG emissions. The Modified Project would nonetheless comply with applicable GHG emissions reductions strategies articulated within the California Air Resources Board (CARB) Scoping Plan and the Regional Transportation Plan and Sustainable Communities Strategy, as summarized below.

### **California Air Resources Board (CARB) Scoping Plan Consistency**

These measures include but are not limited to: California low carbon fuel standards (LCFS); California Appliance Energy Efficiency regulations; California Building Standards (i.e., CALGreen and the 2016 Building and Energy Efficiency Standards); statewide implementation of the 33 percent Renewable Portfolio Standard (RPS) for all retail sellers of electricity; and corporate average fuel economy (CAFE) standards (e.g., Pavley I and California Advanced Clean Cars [Pavley II]).

### **Regional Transportation Plan and Sustainable Communities Strategy Consistency**

The Southern California Association of Governments (SCAG) is the federally recognized Metropolitan Planning Organization (MPO) for this region, which encompasses over 38,000 square miles, and comprises representatives of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their potential impacts on regional planning programs. As Southern California's MPO, SCAG cooperates with the Southern California Air Quality Management District, the California Department of Transportation, and other agencies in preparing regional planning documents.

California's MPOs must prepare a "sustainable communities strategy" (SCS) as part of its regional transportation plan (RTP). The SCS integrates land use, housing, and transportation strategies that, if implemented, would achieve regional GHG emission reduction targets. As adopted by the MPO, the RTP/SCS guides regional transportation policies and investments. The CARB is required to review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets.

In 2016, SCAG adopted the *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*. The RTP/SCS vision encompasses general principles and themes that collectively work to shape the Southern California region. The RTP/SCS

includes a strong commitment to reduce emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act. Regional development patterns and integrated transportation systems contemplated under the RTP/SCS would act to reduce per capita Vehicle Miles Traveled (VMT) and associated vehicular-source GHG emissions. The RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the RTP/SCS; rather, the RTP/SCS provides consistency incentives for governments and developers. As demonstrated at Table 7-1, the Project is consistent with RTP/SCS Goals, and would thereby support the RTP/SCS intent to reduce regional GHG emissions.

**Table 7-1  
Modified Project  
Consistency with RTP/SCS Goals**

<b>RTP/SCS Goals</b>	<b>Remarks</b>
<i>Goal 1:</i> Align the plan investments and policies with improving regional economic development and competitiveness.	<i>Consistent:</i> The Modified Project proposes contemporary facilities providing an opportunity for investment in light industrial/business park development on currently underutilized land.
<i>Goal 2:</i> Maximize mobility and accessibility for all people and goods in the region.	<i>Consistent:</i> Consistent with City requirements, the transportation network in the Modified Project area would be developed and maintained to meet local and regional transportation demands, and to ensure efficient mobility.
<i>Goal 3:</i> Ensure travel safety and reliability for all people and goods in the region.	<i>Consistent:</i> The Modified Project would implement those improvements necessary to promote and facilitate the safe movement of people and goods. All transportation modes within the Modified Project area would be required to comply with incumbent regulatory safety standards.
<i>Goal 4:</i> Preserve and ensure a sustainable regional transportation system.	<i>Consistent:</i> The Modified Project traffic study assesses all new and existing roadways and identifies required improvements to the existing transportation network. The Modified Project would construct required improvements, and/or would, to the extent feasible, otherwise offset its incremental contributions to transportation system impacts, acting to ensure sustainable local and regional transportation systems.
<i>Goal 5:</i> Maximize the productivity of our transportation system.	<i>Consistent:</i> Pursuant to adopted plans and programs, local and regional transportation systems would be improved and maintained to

**Table 7-1**  
**Modified Project**  
**Consistency with RTP/SCS Goals**

RTP/SCS Goals	Remarks
	encourage their efficiency and productivity. The City of Torrance oversees the improvement and maintenance of all aspects of the public right-of-way on an as-needed basis.
<i>Goal 6:</i> Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	<i>Consistent:</i> The Modified Project would accommodate and would not interfere with existing or planned bicycle facilities and improvements. The Modified Project would provide pedestrian access that internally links all uses and connects to the existing off-site pedestrian network.
<i>Goal 7:</i> Actively encourage and create incentives for energy efficiency, where possible.	<i>Consistent:</i> The Modified Project in total would comply with incumbent performance standards established under the Building Energy Efficiency Standards contained in the California Code of Regulations (CCR), Title 24, Part 6 (Title 24, Title 24 Energy Efficiency Standards).
<i>Goal 8:</i> Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	<i>Consistent:</i> The Modified Project proposes uses with proximate access to local and regional transportation facilities. Proposed intensified development of the Modified Project Site in combination with existing and proposed proximate development acts to focus the transit ridership base, thereby supporting existing and future transit opportunities.
<i>Goal 9:</i> Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	<i>Consistent:</i> The City of Torrance is responsible for monitoring existing and newly constructed roadways and transit routes to determine the adequacy and safety of these systems. The City and other local and regional agencies and organizations (e.g., RTA, Caltrans, and SCAG) cooperatively manage these systems. Security situations involving roadways and evacuations would be addressed through City emergency response plans.

Sources: Goal Statements from: 2016–2040 RTP/SCS; Remarks by Applied Planning, Inc.

Based on the preceding, the Modified Project would comply with applicable plans, policies, or regulations of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Accordingly, no new or substantially increased impacts related to compliance with GHG emissions reduction plans, policies, or regulations would occur as a result of the Modified Project.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased GHG emissions impacts would occur as a result of the Modified Project.

*Sources:* Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; Torrance Technology Park Air Quality & Greenhouse Gas Memorandum (Urban Crossroads, Inc.) February 2, 2018; Torrance Technology Park Design Concepts.

**8. HAZARDS AND HAZARDOUS MATERIALS**

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?						X
b) 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?						X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?						X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?						X

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
e) 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, would the project result in a safety hazard for people residing or working in the project area?						X
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?						X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?						X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?						X

**Substantiation:**

a – h) *No Impact*

**2000 MND Conclusions:** The 2000 MND concluded that the Original Project would have no potential to create or result in a significant increase to the exposure of people to hazardous materials or to other health hazards (2000 MND, pp. 6 – 7).

**2000 MND Mitigation Measures:** None.

**Modified Project:** The Modified Project would not result in or cause exposure(s) to hazards or potentially hazardous conditions. That is, uses proposed under the Modified Project are not considered hazardous.

During the normal course of construction and operation activities, there would be limited transport of potentially hazardous materials (e.g., gasoline, diesel fuel, paints, solvents, fertilizer, etc.) to and from the Modified Project site.

As with the Original Project, the Modified Project would be required to comply with all City and County Hazardous Materials Management Plans and regulations addressing transport, use, storage and disposal of these materials. The Modified Project does not propose or require uses or activities that would result in atypical transportation, use, storage, or disposal of hazardous or potentially hazardous materials not addressed under current regulations and policies.

Further, any occupancies that would store or use hazardous materials would be required to comply with California Hazardous Materials Business Plan (HMBP) requirements (*California Health & Safety Code*, Division 20, Chapter 6.95) The HMBP contains detailed information on the storage of hazardous materials at regulated facilities. The purpose of the HMBP is to prevent or minimize damage to public health, safety, and the environment, from a release or threatened release of a hazardous material. The HMBP also provides emergency response personnel with adequate information to help them better prepare and respond to chemical-related incidents at regulated facilities.

Based on the preceding, as with the Original Project, the Modified Project would have no potential to result in a significant increase to the exposure of people to hazardous materials or to other health hazards.

**Modified Project Mitigation Measures: None.**

As substantiated by the preceding discussions, no new or substantially increased hazards and hazardous materials impacts would occur as a result of the Modified Project.

*Sources: Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.*



## 9. HYDROLOGY AND WATER QUALITY

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Violate any water quality standards or waste discharge requirements?						X
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (for example, the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?						X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?						X
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?					X	
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?						X
f) Otherwise substantially degrade water quality?						X

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?						X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?						X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?						X
j) Inundation by seiche, tsunami, or mudflow?						X

**Substantiation:**

a – c, e – j) *No Impact.*

**2000 MND Conclusions:** The 2000 MND conclusions regarding hydrology and water quality included the following:

- Drainage and surface runoff related to short term construction activities would be controlled pursuant to the provisions of City grading permit(s);
- That the Master Drainage plan encompassing the Original Project site and surrounding areas requires either a central drain to be constructed prior to issuance of building permits or the provision of on-site retention of stormwater;
- There was sufficient sewer system capacity to serve the Original Project;
- The Original Project is not located near any surface waters and is not located in an area subject to flooding; and
- Pursuant to the Torrance Municipal Code, all wastewater and stormwater discharges generated by the Original Project would be directed to the appropriate receiving and treatment system(s).

Based on the preceding, the 2000 MND determined that the Original Project would have no impacts regarding the potential to:

- Violate any water quality standards or waste discharge requirements;
  - Substantially deplete groundwater supplies or interfere substantially with groundwater recharge;
  - Substantially alter the existing drainage pattern of the site or area;
  - Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
  - Otherwise substantially degrade water quality;
  - Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
  - Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
  - Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
  - Result in inundation by seiche, tsunami, or mudflow.
- [2000 MND, pp. 7 – 8].

**2000 MND Mitigation Measures:** None.

**Modified Project:** As with the Original Project, the Modified Project would:

- Comply with construction drainage and surface runoff controls pursuant to the provisions of City grading permit(s);
- Connect to available storm drains and, if required by the City, implement on-site retention acting to control stormwater runoff from the developed site;
- Connect to the available sanitary sewer system; and

- Pursuant to the Torrance Municipal Code,<sup>7</sup> all waste water and stormwater discharges generated by the Modified Project would be directed to the appropriate receiving and treatment system(s).

The Modified Project would be required to comply with current water quality standards and stormwater discharge requirements established by the City and the Los Angeles County Regional Water Quality Control Board (LARWQCB). The current standards and requirements are globally more stringent than those in effect at the time the 2000 MND was prepared.

Further, the Modified Project is not located near any surface waters and is not located in an area subject to flooding. The Modified Project would therefore not implement structures that would impede or redirect flood waters or otherwise affect floodplain or flooding conditions. The Modified Project does not propose or require housing and would therefore not place housing within a 100-year floodplain. The Modified Project Site is not located proximate to dams or any substantive bodies of water and is therefore not subject to inundation by dam failure, seiche, or tsunami. The Modified Project Site and surrounding areas are level and stable and not subject to inundation by mudflow.

Based on the preceding, as with the Original Project, the Modified Project would have no impacts regarding the potential to:

- Violate any water quality standards or waste discharge requirements;
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge;
- Substantially alter the existing drainage pattern of the site or area;
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- Otherwise substantially degrade water quality;

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<sup>7</sup> Municipal Code Chapter 2, *Sewers*; Municipal Code Chapter 10, *Stormwater and Urban Runoff Pollution Control*; et al.

- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- Result in inundation by seiche, tsunami, or mudflow.

**Modified Project Mitigation Measures:** None.

*d) No Changes or New Information Requiring Preparation of an MND or EIR.*

**2000 MND Conclusions:** The 2000 MND notes that while soil absorption rates would be altered due to increased impervious surface areas under the Original Project, requirements of the Torrance Municipal Code and the Uniform Building Code would direct drainage and surface runoff to the available storm drain system. On this basis, the 2000 MND concluded that the potential for the Original Project to substantially alter the existing drainage pattern of the area that would result in flooding on- or off-site was less-than-significant (2000 MND, pp. 7 – 8).

**2000 MND Mitigation Measures:** None.

**Modified Project:** As with the Original Project, the Modified Project would comply with requirements of the Torrance Municipal Code and the Uniform Building Code, directing drainage and surface runoff from the Modified Project to the available storm drain system. As with the Original Project, the potential for the Modified Project to substantially alter the existing drainage pattern of the area that would result in flooding on- or off-site would therefore be less-than-significant.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased hydrology and water quality impacts would occur as a result of the Modified Project.

*Sources: Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.*

**10. LAND USE AND PLANNING**

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Physically divide an established community?						X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?						X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?						X

**Substantiation:**

a – c) *No Impact.*

**2000 MND Conclusions:** The 2000 MND notes that the Original Project site was designated as “Business Park” in in the City’s General Plan. The Business Park designation is intended to promote high quality development of research and development, corporate offices and manufacturing uses (conducted within buildings and producing no significant externalities) in a campus-like setting. As a land use, the Original Project would be consistent with the Business Park designation. Moreover, the Original Project land uses would be permitted or conditionally permitted under the site’s existing M-2 zoning. The Original Project does not propose or require uses or facilities that would physically divide an established community. The Original Project would conform to applicable City development design and development standards.

On this basis, the 2000 MND concluded that the Original Project would have no potential to:

- Physically divide an established community;
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect; or
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

[2000 MND, p. 8]

**2000 MND Mitigation Measures:** None.

**Modified Project:** As with the Original Project, land uses and development concepts proposed under the Modified Project would be allowed under the site's current City General Plan Land Use designation (Business Park, I-BP); and would be permitted or conditionally permitted under the site's current Zoning designation (Heavy Manufacturing, M-2). The Modified Project does not propose or require a General Plan Land Use amendment or change in Zoning. The Modified Project is not subject to other land use plans adopted for the purpose of avoiding or mitigating an environmental effect. Based on the preceding, as with the Original Project, the Modified Project would have no potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

The Modified Project uses would be implemented with a developed site that is currently used for vehicle staging and servicing. The Modified Project would therefore result in division of established community. Nor would the Modified Project otherwise result in or require uses or activities that would physically divide an established community. Based on the preceding, as with the Original Project, the Modified Project would have no potential to physically divide an established community.

The Modified Project Site is designated for light industrial/business park uses and is not subject to provisions of a habitat conservation plan or natural community conservation plan. On this basis, the Modified Project would have no potential to conflict with any applicable habitat conservation plan or natural community conservation plan.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased land use and planning impacts would occur as a result of the Modified Project.

*Sources:* Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; City of Torrance 1992 General Plan; Torrance Technology Park Design Concepts.

## 11. MINERAL RESOURCES

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?						X
a) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?						X

### Substantiation:

a, b) *No Impact.*

**2000 MND Conclusions:** The 2000 MND notes that there are no known mineral resources within the Original Project site, and accordingly concludes that the Original Project would have no potential to result in the loss of a known mineral resource of



value to the region or the state; or result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan (2000 MND, pp. 8 – 9).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Underlying conditions at the subject site have not changed since preparation of the 2000 MND, and the subject site remains devoid of any potentially valuable or locally-important mineral resources. On this basis, as with the Original Project, the Modified Project would have no potential to result in the loss of a known mineral resource of value to the region or the state; or result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased mineral resources impacts would occur as a result of the Modified Project.

**Sources:** *Toyota South Campus Plan Mitigated Negative Declaration* (City of Torrance) October 17, 2000; *City of Torrance 1992 General Plan*; *Torrance Technology Park Design Concepts*.

## 12. NOISE

Would the project result in:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?					X	

Would the project result in:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?						X
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?						X
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?					X	
e) 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, would the project expose people residing or working in the project area to excessive noise levels?						X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?						X

**Substantiation:**

a, d) *No Changes or New Information Requiring Preparation of an MND or EIR.*

**2000 MND Conclusions:** The 2000 MND notes that construction-source noise generated by the Original Project would be regulated pursuant to the City of Torrance Municipal Code; and that long-term noise levels generated by the Original Project would be typical of the surrounding area. On this basis, the 2000 MND concluded that the potential for the Original Project to result in exposure of persons to or generation of noise levels in excess of applicable standards would be less-than-significant; and that the potential for the Original Project to result in a substantial temporary or periodic

increase in ambient noise levels in the project vicinity would be less-than-significant (2000 MND, p. 9).

**2000 MND Mitigation Measures:** None.

### **Modified Project:**

#### **Construction-Source Noise**

As with the Original Project, it is assumed the Modified Project would comply with applicable provisions of the City of Torrance Municipal Code, to include compliance with restrictions on generation of construction-source noise. This would ensure that temporary or periodic construction-source noise generated by the Modified Project would not result in exposure of persons to or generation of noise levels in excess of applicable standards. Additionally, as substantiated in *Torrance Technology Park Noise Impact Assessment Memorandum* (Urban Crossroads, Inc.) February 2, 2018 (Modified Project Noise Impact Assessment, Addendum Appendix C), maximum construction-source noise generated by the Modified Project as received at the nearest residential land uses would not exceed 44.4 dBA Leq (Modified Project Noise Impact Assessment, p. 13). The maximum received noise level would not exceed even the most stringent City construction noise standard of 50 dBA Leq.<sup>8</sup>

The City General Plan Noise Element indicates that ambient noise levels at residential receivers nearest the Modified Project Site<sup>9</sup> approximate 60 – 65 dBA CNEL (General Plan, p. N-6; Figure N-2, *Baseline Noise Conditions*). The maximum noise level generated by Modified Project construction activities as received at the nearest residential receptors would approximate 44.4 dBA Leq. This noise level would be indiscernible against and would not affect the 60 – 65 dBA ambient noise condition at the nearest residential receptors.

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<sup>8</sup> It is assumed that the Modified Project construction activities would comply with City approved hour of activity restrictions, thereby precluding construction activities during noise-sensitive time periods. To present a conservative approach, Modified Project Noise Impact Assessment nonetheless evaluates construction noise based on the 50 dBA Leq exterior construction noise level limit identified in City of Torrance Municipal Code Section 46.3.1(a).

<sup>9</sup> Residential uses nearest the Modified Project Site are located approximately 1,600 feet northerly across 190<sup>th</sup> Street; and approximately 1,800 feet southerly, across Del Amo Boulevard.

Based on the preceding, and as with the Original Project, the potential for construction-source noise generated by the Modified Project to result in exposure of persons to or generation of noise levels in excess of applicable standards; or result in a substantial temporary or periodic increase in vicinity ambient noise levels would be less-than-significant.

## **Operational-Source Noise**

### *Stationary/Area Sources*

The Modified Project does not propose or require uses that would result in long-term sources or periodic noise. Specifically, as substantiated in the Modified Project Noise Impact Assessment, long-term stationary/area-source noise generated by the Modified Project uses as received at the nearest sensitive receptors would not exceed 32.6 dBA Leq. The maximum received noise level would therefore not exceed applicable City noise standards of 55 dBA Leq daytime/50 dBA Leq nighttime (Modified Project Noise Impact Assessment, p. 12).

Further, as noted above, ambient noise levels at residential receivers nearest the Modified Project Site approximate 60 – 65 dBA CNEL. The maximum noise level generated by Modified Project stationary/area sources as received at the nearest residential receptors would approximate 32.6 dBA Leq. This noise level would be indiscernible against and would not affect the 60 – 65 dBA ambient noise condition at the nearest residential receptors.

### *Vehicular Sources*

Trip generation under the proposed Modified Project would be incrementally reduced when compared to trip generation of the Original Project General Office uses (please refer to Table 12-1). Based on this comparative trip reduction, vehicular-source noise generated by the Modified Project would be reduced when compared to the Original Project. Already less-than-significant vehicular-source noise impacts occurring under the Original Project would be further diminished under the Modified Project.

**Table 12-1**  
**Trip Generation Comparison – Modified Project and Original Project**

Land Use	ITE Land Use Code	Metric	Total	Total Peak Hour Trips		Total Daily Trips
				AM	PM	
Modified Project – Industrial Park	130	TSF	410.00	204	204	1,708
Original Project – General Office	710	TSF	351.36	407	404	3,422

**Sources:** Industrial Park trip generation from: *Proposed Torrance Technology Park Project Trip Generation Analysis Memorandum* (Michael Baker International) February 20, 2018.

**Notes:**

1. Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, 10<sup>th</sup> Edition (2017).
2. TSF = Thousand Square Feet
3. Trips expressed as Passenger Car Equivalence (PCE)

Based on the preceding, and as with the Original Project, the potential for operational-source noise generated by the Modified Project to result in exposure of persons to or generation of noise levels in excess of applicable standards; or result in a substantial temporary or periodic increase in vicinity ambient noise levels would be less-than-significant.

**Modified Project Mitigation Measures:** None.

b) *No Impact.*

**2000 MND Conclusions:** The 2000 MND concluded that the Original Project had no potential to result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels (2000 MND, p. 9).

**2000 MND Mitigation Measures:** None.

**Modified Project:**

The Modified Project does not propose or require uses or activities that would result in perceptible operational-source vibration at off-site land uses. However, heavy equipment operations during construction of the Modified Project uses could result in perceptible vibration at off-site land uses.

The City of Torrance General Plan and Municipal Code does not identify quantified vibration level standards. For purposes of this analysis, vibration levels at residential land uses would be considered potentially significant if the received levels exceed the Los Angeles County Code, Section 12.08.350, vibration perception threshold of a 0.01 in/sec root-mean-square (RMS) velocity.

As substantiated in the Modified Project Noise Impact Assessment, maximum received vibration levels at off-site residential land uses would approximate 0.0001 in/sec RMS and would therefore not exceed the Los Angeles County Code vibration perception threshold of a 0.01 in/sec RMS (Modified Project Noise Impact Assessment, p. 16).

Based on the preceding, as with the Original Project, the Modified Project would have no potential to result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

**Modified Project Mitigation Measures:** None.

*c) No Impact.*

**2000 MND Conclusions:** The 2000 MND notes that long-term noise levels generated by the Original Project would be typical of the surrounding area. On this basis, the 2000 MND concluded that the Original Project would have no potential to result in a substantial permanent increase in ambient noise levels (2000 MND, p. 9).

**2000 MND Mitigation Measures:** None.

**Modified Project:** As substantiated above at Checklist Item 12. a), long-term noise levels generated by the Modified Project would in all instances be less-than-significant and would not be perceptible against background conditions. On this basis, as with the Original Project, the Modified Project would have no potential to result in a substantial permanent increase in ambient noise levels.

**Modified Project Mitigation Measures:** None.

e, f) *No Impact*.

**2000 MND Conclusions:** The Original Project is not subject to provisions of an airport land use plan; and is located approximately 3.5 miles northeasterly of the Torrance Municipal Airport, the nearest public use airport. There are no private airstrips in the vicinity of the Original Project. The 2000 MND concluded that the Original Project would have no potential to expose people of excessive noise from public airports or private airstrips (2000 MND, p. 9).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Since preparation of the 2000 MND, there has been no change in circumstances regarding proximity to public airports or private airfields or potential exposure to airport/airfield noise that could affect the Modified Project. That is, the Modified Project is not subject to provisions of an airport land use plan; and is located approximately 3.5 miles northeasterly of the Torrance Municipal Airport, the nearest public use airport. There are no private airstrips in the vicinity of the Modified Project. There would be no impacts affecting the Modified Project related to noise from public use airports or private airstrips. Neither does the Modified Project propose or require uses that would substantively contribute to public use airport noise or private airstrip airport noise.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased noise impacts would occur as a result of the Modified Project.

**Sources:** *Toyota South Campus Plan Mitigated Negative Declaration* (City of Torrance) October 17, 2000; *Torrance Technology Park Noise Impact Assessment Memorandum* (Urban Crossroads, Inc.) February 2, 2018; *Proposed Torrance Technology Park Project Trip Generation Analysis Memorandum* (Michael Baker International) February 1, 2018; *Proposed Torrance Technology Park Project Trip Generation Analysis Memorandum* (Michael Baker International) February 20, 2018; City of Torrance Municipal Code, Chapter 6

Noise Regulation; County of Los Angeles Municipal Code, Chapter 12.08; Torrance Technology Park Design Concepts.

### 13. POPULATION AND HOUSING

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Induce substantial growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?						X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?						X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?						X

**Substantiation:**

a – c) *No Impact.*

**2000 MND Conclusions:** The 2000 MND noted that the subject site is designated for industrial uses, and that the corporate headquarters facilities proposed by the Original Project would not affect adopted population [growth] projections. The 2000 MND also noted that because the site was vacant at the time the 2000 MND was prepared, the Original Project would not displace any housing or displace any persons. On this basis, the 2000 MND concluded that there was no potential for the Original Project to induce substantial population growth; displace substantial numbers of existing housing; or displace substantial numbers of people.

**2000 MND Mitigation Measures:** None



**Modified Project:** Since preparation of the 2000 MND, Phase I of the Original Project has been completed, resulting in development of various business park/light industrial uses. Additionally, the Phase II portion of the Original Project has been developed as a vehicle staging and maintenance area. In these regards, the Original Project as implemented to date is consistent with both the General Plan Land Use designation and Zoning requirements of the subject site and has not substantively affected adopted population growth projections. Further, the Original Project as implemented to date has not displaced housing or displaced persons.

The land uses proposed under the Modified Project are consistent with the General Plan Land Use designation and Zoning requirements of the subject site and would not substantively affect adopted population growth projections. No housing exists or is envisioned for development within the Modified Project Site. The Modified Project Site does not accommodate any resident populations. On this basis, as with the Original Project, the Modified Project would have no potential to induce substantial population growth; displace substantial numbers of existing housing; or displace substantial numbers of people.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased population and housing impacts would occur as a result of the Modified Project.

*Sources:* City of Torrance 1992 General Plan; City of Torrance Zoning Map; Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.

## 14. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any public service:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Fire protection?						X
b) Police protection?						X
c) Schools?						X
d) Parks?						X
e) Other public facilities?						X

### Substantiation:

a – e) *No Impact.*

**2000 MND Conclusions:** The 2000 MND noted that adequate water service/water flow was available to the Original Project site. The 2000 MND notes further that the Original Project would contribute to cumulative demands for public services; however, the impact of the Original Project alone was not expected to be significant. On this basis, the 2000 MND concluded that the Original Project would have no potential to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impact (2000 MND, p. 10).

**2000 MND Mitigation Measures:** None.

**Modified Project:** Consistent with the Original Project, the Modified Project would be served by existing services, including but not limited to water services noted in the 2000 MND Project. As no residential component is proposed, no school-aged populations would be generated, and the Modified Project would not substantively affect school services.

The Modified Project would, however, incrementally contribute to demands for other public services generally. These demands are offset by purveyor connection and service fees and payment of City Development Impact Fees (DIF). In no instance would service demands of the Modified Project require the construction of new facilities that would result in potentially significant environmental impacts. On this basis, as with the Original Project, the Modified Project would have no potential to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased public services impacts would occur as a result of the Modified Project.

*Sources:* Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.

## 15. RECREATION

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) 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?						X
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?						X

**Substantiation:**

a, b) *No Impact.*

**2000 MND Conclusions:** The 2000 MND notes that the Original Project would not generate substantive resident populations. The Original Project would therefore have no potential to 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; or to include or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (2000 MND, pp. 10 – 11).

**2000 MND Mitigation Measures:** None.

**Modified Project:** As with the Original Project, the Modified Project would not generate substantive resident populations, and therefore would have no potential to 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; or to include or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased recreation impacts would occur as a result of the Modified Project.

**Sources:** *Toyota South Campus Plan Mitigated Negative Declaration* (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.

## 16. TRANSPORTATION/TRAFFIC

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?					X	
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads and highways?					X	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?						X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?						X
e) Result in inadequate emergency access?						X
f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?						X

**Substantiation:**

a, b) *No Changes or New Information Requiring Preparation of an MND or EIR.*

**2000 MND Conclusions:** The 2000 MND concluded that with implementation of mitigation, the potential for the Original Project to conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system; or conflict with an applicable congestion management program would be less-than-significant (2000 MND, pp. 11 – 12).

**2000 MND Mitigation Measures:**

*a) I-405 South Bound ramps at 190th Street. Widen the north side of 190th Street, between I-405 SB ramps and Western Avenue to provide a separate westbound right-turn-only lane on 190th Street. Convert existing right-turn-only lane to a third westbound through lane on 190th Street. Modify signal accordingly.*

*b) Western Avenue at 190th Street. Widen Western Avenue to provide a separate southbound right-turn-only lane. Modify signal accordingly.*

*c) Crenshaw Boulevard at Torrance Boulevard. Restripe Torrance Boulevard to provide a third westbound through lane. This improvement is part of the City's Capital Improvement Program but is not funded. Toyota will fund the implementation of this improvement to mitigate their traffic impacts at this key intersection. Modify signal accordingly.*

*d) Western Avenue at Torrance Boulevard. Relocate the railroad gates and modify existing median island on Western Avenue and restripe to provide a second southbound left-turn lane. This mitigation may require approval by the California Public Utilities Commission to remove and relocate railroad gates.*

*Furthermore, a field review of existing operating conditions at four additional intersections indicate that access and egress to the Toyota campus and the surrounding area can be improved by additional enhancements which will require widening and/or restriping of*

existing roadways; including enhancements at Van Ness & 190th, Western & 195th, Van Ness & Del Amo, Western & Del Amo.

**Modified Project:** As described herein, the Modified Project would implement up to 410,000 square feet of Industrial Park uses in place of current entitlements for 377,560 square feet of General Office uses approved under the Original Project. No other aspects of the Original Project would be substantively affected by the Modified Project.

As summarized at Table 16-1, the Modified Project Industrial Park uses would generate fewer peak hour and total daily trips than would the Original Project General Office uses.

**Table 16-1**  
**Trip Generation Comparison – Modified Project and Original Project**

Land Use	ITE Land Use Code	Metric	Total	Total Peak Hour Trips		Total Daily Trips
				AM	PM	
Modified Project – Industrial Park	130	TSF	410.00	204	204	1,708
Original Project – General Office	710	TSF	351.36	407	404	3,422
<b>Modified Project Net Trips</b>	---	---	---	(203)	(200)	(1,714)

**Source:** Proposed Torrance Technology Park Project Trip Generation Analysis Memorandum (Michael Baker International) February 20, 2018.

**Notes:**

1. Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, 10<sup>th</sup> Edition (2017).
2. TSF = Thousand Square Feet
3. Trips Expressed in Passenger Car Equivalence (PCE)

Under the Modified Project, transportation/traffic mitigation measures from the 2000 MND, or equivalent requirements stipulated through City Conditions of Approval, are carried forward. The City shall determine which of the mitigation measures identified in the 2000 MND have been completed and/or are no longer determined necessary. The remaining measures (if any) shall be implemented as directed by the City. For reference, mitigation measures presented in the 2000 MND are incorporated herein as Mitigation Measures TR-1 through TR-5.

## **Modified Project Mitigation Measures:**

*TR-1) I-405 South Bound ramps at 190th Street. Widen the north side of 190th Street, between I-405 SB ramps and Western Avenue to provide a separate westbound right-turn-only lane on 190th Street. Convert existing right-turn-only lane to a third westbound through lane on 190th Street. Modify signal accordingly.*

*TR-2) Western Avenue at 190th Street. Widen Western Avenue to provide a separate southbound right-turn-only lane. Modify signal accordingly.*

*TR-3) Crenshaw Boulevard at Torrance Boulevard. Restripe Torrance Boulevard to provide a third westbound through lane. This improvement is part of the City's Capital Improvement Program but is not funded. Toyota will fund the implementation of this improvement to mitigate their traffic impacts at this key intersection. Modify signal accordingly.*

*TR-4) Western Avenue at Torrance Boulevard. Relocate the railroad gates and modify existing median island on Western Avenue and restripe to provide a second southbound left-turn lane. This mitigation may require approval by the California Public Utilities Commission to remove and relocate railroad gates.*

*TR-5) Furthermore, a field review of existing operating conditions at four additional intersections indicate that access and egress to the Toyota campus and the surrounding area can be improved by additional enhancements which will require widening and/or restriping of existing roadways; including enhancements at Van Ness & 190th, Western & 195th, Van Ness & Del Amo, Western & Del Amo.*

Because the Modified Project uses would generate fewer trips than the Original Project General Office uses, incremental effects of the Modified Project uses on transportation/traffic systems would be diminished when compared to effects of the Original Project General Office uses. The Modified Project would implement measures necessary to mitigate potentially significant transportation/traffic impacts pursuant to the 2000 MND (or equivalent measures pursuant to City Conditions of Approval). Because mitigated transportation/traffic impacts of the Original Project were



determined to be less-than-significant, mitigated transportation/traffic impacts of the Modified Project would similarly be less-than-significant.

c – f) *No Impact.*

**2000 MND Conclusions:** The 2000 MND concluded that the Original Project would have no potential to:

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase hazards due to a design feature or incompatible uses;
- Result in inadequate emergency access;
- Result in inadequate parking capacity; or
- Conflict with adopted policies, plans, or programs supporting alternative transportation.

[2000 MND, pp. 10 – 11]

**2000 MND Mitigation Measures:** None.

**Modified Project:** The Modified Project does not propose or require uses or facilities that would affect air traffic patterns. On this basis, the Modified Project would have no impact on air traffic patterns that would result in a substantial safety risk.

The Modified Project does not propose elements or aspects that would substantially increase transportation/traffic hazards. Moreover, all improvements would be designed and implemented consistent with City traffic engineering and safety standards, thereby minimizing the potential to result in or cause hazardous traffic/transportation conditions.

The Modified Project would generate traffic typical of Industrial Park uses and comparable to traffic types present within the area roadway system. The Modified

Project uses would therefore not cause or result in incompatible vehicle movements or traffic categories that would substantively increase hazards. Further, based on the projected net decrease in trip generation under the Modified Project, the potential for the Modified Project to result in potential traffic hazards would likely be reduced when compared to the Original Project.

The Modified Project does not propose or require uses or facilities that would permanently or adversely affect emergency access to the subject or surrounding properties. In conjunction with the review and approval of building permits, the City of Torrance Community Development Department, Fire Department and Police Department would review all plans to assure compliance with all applicable emergency access and safety requirements.

Parking impacts are no longer a CEQA *Guidelines* discussion topic. Notwithstanding, the Modified Project would be required to provide adequate parking during construction pursuant to the Project Construction Traffic Management Plan (please refer to Addendum Section 2. *Modified Project Description*, 2.5.9 *Construction Traffic Management Plan*). Additionally, the Modified Project as implemented would comply with mandated City parking standards. On this basis, the Modified Project would not result in or cause parking impacts that are substantively greater than or different than those resulting from the Original Project.

The Modified Project would implement pedestrian and bicycle access pursuant to City Conditions of Approval. The Modified Project does not propose or require facilities or operations that would adversely affect or conflict with alternative transportation plans or policies. On this basis, the Modified Project would not result in or cause impacts to public transit or alternative transportation modes that are substantively greater than or different than those considered and addressed in the 2000 MND.

Based on the preceding, as with the Original Project, the Modified Project would have no potential to:

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase hazards due to a design feature or incompatible uses;
- Result in inadequate emergency access;
- Result in inadequate parking capacity; or
- Conflict with adopted policies, plans, or programs supporting alternative transportation.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased transportation/traffic impacts would occur as a result of the Modified Project.

*Sources: Proposed Torrance Technology Park Project Trip Generation Analysis Memorandum (Michael Baker International) February 20, 2018; Torrance Technology Park Traffic Impact Analysis (RK Engineering Group) March 2018; Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.*

**17. TRIBAL CULTURAL RESOURCES**

<p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 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:</p>	<p>Substantial Change in Project Requiring Major MND Revisions</p>	<p>Substantial Change in Circumstances Requiring Major MND Revisions</p>	<p>New Information Showing Greater Significant Effects than Previous MND</p>	<p>New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND</p>	<p>No Changes or New Information Requiring Preparation of an MND or EIR</p>	<p>No Impact</p>
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Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 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:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or						X
b) 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. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.						X

**Substantiation:**

The topic of Tribal Cultural Resources (TCR) is a recent addition to the CEQA checklist and was not evaluated as part of the 2000 MND.

a, b) *No Impact.*

As discussed previously at Checklist Item 5. *Cultural Resources*, neither the Original Project or the Modified Project would potentially adversely affect historic, archaeological, or paleontological resources. Neither the Original Project or the Modified Project would potentially adversely affect human remains.

Additionally, evaluation of impacts to TCR pursuant to *AB 52, Gatto. Native Americans: California Environmental Quality Act* applies only to CEQA projects that are required to file a Notice of Preparation for an Environmental Impact Report, or Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration. Because the Modified

Project would not be required to file any of the mentioned documents, AB 52 addressing potential impacts to tribal resources is not applicable within the context of this Addendum analysis.

As substantiated by the preceding discussions, no new or substantially increased TCR impacts would occur as a result of the Modified Project.

*Sources:* AB 52, Gatto. Native Americans: California Environmental Quality Act; Toyota South Campus Plan Mitigated Negative Declaration (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.

### 18. UTILITIES AND SERVICE SYSTEMS

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?						X
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?						X
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significance environmental effects?						X
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?						X

Would the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?						X
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?						X
g) Comply with federal, state, and local statutes and regulations related to solid waste?						X

**Substantiation:**

a – g) *No Impact.*

**2000 MND Conclusions:** The 2000 MND concluded that based on demands of the Original Project, the current availability of utilities and services systems, and the residual capacities of those systems, that the Original Project would have no potential to:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;

- Have insufficient water supplies available to serve the project from existing entitlements and resources;
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- Exceed serving landfill(s) permitted capacity(ies); or
- Conflict with federal, state, and local statutes and regulations related to solid waste.

[2000 MND, pp. 12 – 13].

**2000 MND Mitigation Measures:** None.

**Modified Project:** Since approval of the Original Project, development of the Toyota Campus in total has been substantively completed, including implementation of any necessary area-serving backbone infrastructure/utility systems improvements. Because the Modified Project would result in comparable development intensities and related demands on utilities and services when compared to the Original Project, public services and utilities impacts resulting from the Modified Project would be similar to those of the Original Project.

The Modified Project would provide will-serve letters from serving water and sanitary sewer service purveyors and would implement any necessary localized utilities infrastructure realignments or other modifications consistent with City Conditions of Approval and purveyor requirements. On this basis, as with the Original Project, the Modified Project would have no potential to:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;

- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Have insufficient water supplies available to serve the project from existing entitlements and resources;
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- Exceed serving landfill(s) permitted capacity(ies); or
- Conflict with federal, state, and local statutes and regulations related to solid waste.

**Modified Project Mitigation Measures:** None.

As substantiated by the preceding discussions, no new or substantially increased utilities and service systems impacts would occur as a result of the Modified Project.

**Sources:** *Toyota South Campus Plan Mitigated Negative Declaration* (City of Torrance) October 17, 2000; Torrance Technology Park Design Concepts.



**19. MANDATORY FINDINGS OF SIGNIFICANCE**

Does the project:	Substantial Change in Project Requiring Major MND Revisions	Substantial Change in Circumstances Requiring Major MND Revisions	New Information Showing Greater Significant Effects than Previous MND	New Information Showing Ability to Reduce but not Eliminate Significant Effects in Previous MND	No Changes or New Information Requiring Preparation of an MND or EIR	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?						X
b) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)						X
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?					X	

**Substantiation:**

a – b) *No Impact*

**2000 MND Conclusions:** The 2000 MND concluded that based on the analysis in that document, the Original Project would have no potential to:

- Degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the

number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory; or

- Have impacts that are individually limited, but cumulatively considerable.

[2000 MND, pp. 13 – 14].

**Modified Project:** As supported by the discussions presented herein, the Modified Project would not result in or cause any new significant impacts, substantively increased impacts, or substantively different environmental impacts than those previously addressed in the 2000 MND. Specifically, as substantiated by these Addendum discussions, the Modified Project would not substantially increase, or otherwise affect the potential to:

- Degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory; or
- Result in impacts that are individually limited, but cumulatively considerable; or have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

c) *No Changes or New Information Requiring Preparation of an MND or EIR.*

**2000 MND Conclusions:** The Original Project would result in potentially significant transportation/traffic impacts; but would not otherwise result in environmental effects that could potentially cause substantial adverse effects on human beings, either directly or indirectly. Mitigation presented in the 2000 MND would reduce potentially significant traffic/transportation impacts of the Original Project to levels that would be less-than-significant. With incorporation of mitigation, the Original Project would not

result in environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly.

As discussed herein, when compared to the Original Project, trip generation would be substantively reduced under the Modified Project, as would resulting potential transportation/traffic impacts. The Modified Project would incorporate all applicable mitigation measures from the 2000 MND. No new or substantially increased transportation/traffic impacts would occur as a result of the Modified Project. On this basis, as with the Original Project, the potential for Modified Project to have environmental effects which could cause substantial adverse effects on human beings, either directly or indirectly would be less-than-significant as mitigated.