

**2019 Addendum
to the 2000 MND
for the
Toyota South Campus Plan Project**

(SCH No. 2000101085)



Prepared for
City of Torrance

September 2019



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to the 2000 MND
for the
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1.0 INTRODUCTION

1.0 INTRODUCTION

1.1 OVERVIEW

This 2019 Addendum to the adopted 2000 *South Toyota Campus Plan Mitigated Negative Declaration* (2000 MND) for the Toyota South Campus Plan Project substantiates that proposed 2019 Modification to the Original Project described herein would not result in new significant impacts, substantially different impacts, or impacts that would be substantially more severe than those evaluated and addressed in the 2000 MND.

1.2 TOYOTA SOUTH CAMPUS PLAN PROJECT (ORIGINAL PROJECT)

The Original Project comprised Phase I and Phase II development components. The Original Project Phase I entitlements allowed for development of a 26,000-square-foot service garage; 241,680-square-foot customer service center; and a 366,360-square-foot financial service center and parking structure. The Original Project Phase II entitlements allowed for development of 351,360 square feet of general office uses. Total Phase I and II entitlements under the Original Project would allow for up to 985,400 square feet of development. As various Original Project facilities were implemented, supporting infrastructure and services were upgraded to respond to increasing demands of the facilities and their tenants.

CEQA documentation for the Original Project is presented in the *South Toyota Campus Plan Mitigated Negative Declaration* (MND), State Clearinghouse Number 2000101085, referred to herein as the 2000 MND. The City adopted the 2000 MND in November 2000.

The Campus redevelopment concept envisions removal/demolition of existing uses and implementation of contemporary business park, light industrial, and manufacturing uses that respond to current and anticipated market demands. Redevelopment of the Phase II

portion of the Original Project (the 2018 Modified Project) was previously approved by the City in April 2018. CEQA documentation for the 2018 Modified Project is presented in the *2018 Addendum to the 2000 MND for the Toyota South Campus Plan Project* (SCH No. 2000101085), referred to herein as the 2018 MND Addendum. The 2019 Modified Project evaluated herein represents a further increment of the Campus redevelopment concept.

1.3 2019 MODIFIED PROJECT

1.3.1 2019 Modified Project Site Location

The 2019 Modified Project Site is located within the boundaries of the approximately 56-acre Original Project site. More specifically, the 2019 Modified Project Site comprises approximately 33.16 acres located southwesterly of the intersection of 195th Street (E – W) at Western Avenue (N – S) in the City of Torrance, CA. Western Avenue at this location is the City of Torrance/City of Los Angeles shared municipal boundary. Please refer to Figure 1.3-1, *2019 Modified Project - Site Location*.

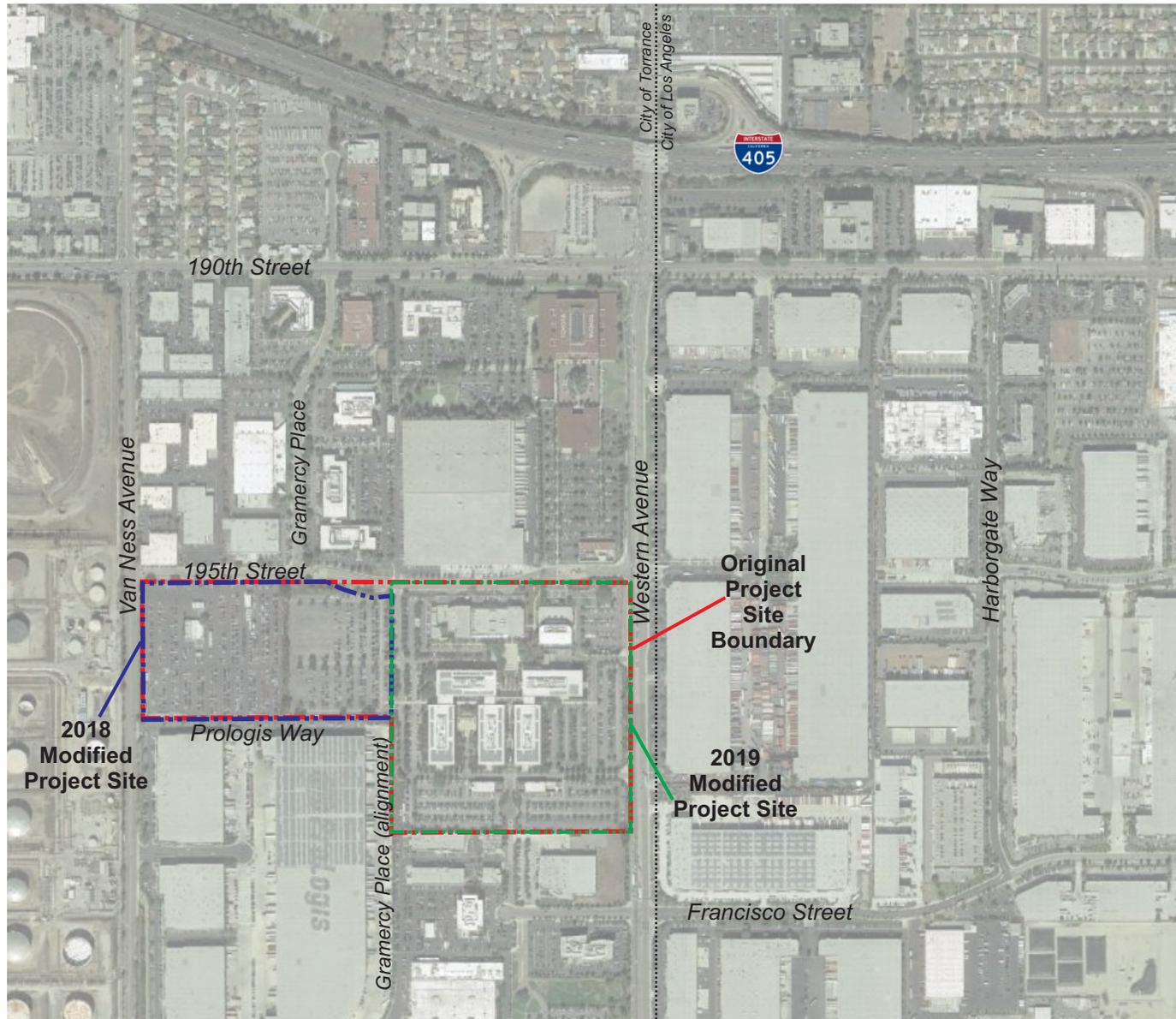
1.3.2 2019 Modified Project Development Summary

The 2019 Modified Project would apportion and redevelop the Phase I area of the Original Project site as summarized at Table 1.3-1. The 2019 Modified Project Site Plan Concept is presented at Figure 1.3-2. The 2019 Modified Project uses are assumed to operate 7 days per week, 24 hours per day. Please refer also to Addendum Section 2.0, *2019 Modified Project – Description*.

**Table 1.3-1
2019 Modified Project Development Summary**

	Parcel Area	Building Area (Square Feet, Maximum)	Land Use
	+/- 26.17 Acres	Bldg. 6 – 605,003 Square Feet	United States Postal Service (USPS) build-to-suit International Parcel Handling Center Facility
	+/- 3.90 Acres	Bldg. 5 – 86,043 Square Feet	Industrial Park
	+/- 3.09 Acres	Bldg. 4 – 69,026 Square Feet	Industrial Park
Totals:	33.16 Acres	760,072 Square Feet	---

Source: Torrance Commerce Center Development Concept (SRG) May 2019.



NOT TO SCALE
 Source: Google Earth; Applied Planning, Inc.

Figure 1.3-1
 2019 Modified Project - Site Location

1.4 CALIFORNIA ENVIRONMENTAL QUALITY ACT DOCUMENTATION

California Environmental Quality Act (CEQA) documentation for the Original Project is presented in the South Toyota Campus Plan Mitigated Negative Declaration (MND), State Clearinghouse Number 2000101085 (2000 MND). This 2019 Addendum to the 2000 MND (2019 MND Addendum, Addendum) compares the impacts that were identified in the 2000 MND with the anticipated impacts of the proposed 2019 Modified Project. This 2019 MND Addendum substantiates that the proposed 2019 Modified Project would not result in new significant impacts, substantially different impacts, or impacts that would be substantially more severe than those evaluated and addressed in the 2000 MND.

1.5 ADDENDUM PURPOSE AND SUMMARY

The purpose of this Addendum is to define, describe, compare, and contrast potential environmental impacts of the proposed 2019 Modified Project in the context of the environmental impacts associated with the Original Project as assessed in the previously-adopted 2000 MND. In so doing, this Addendum substantiates consistency with applicable California Public Resources Code (PRC) and *CEQA Guidelines* requirements.

In these regards, as presented at *CEQA Guidelines* Section 15164, an Addendum to an adopted MND may be prepared if only minor technical changes or additions are necessary and none of the conditions described in *CEQA Guidelines* Section 15162, calling for the preparation of a subsequent or supplemental MND, have occurred. Further, PRC Section 21166 prohibits preparation of a subsequent or supplemental MND to an adopted MND unless substantial project changes are proposed requiring major revisions to the adopted MND; a substantial change in circumstances has occurred requiring major revisions to the adopted MND; or new information becomes available requiring major revisions to the adopted MND. None of these conditions apply to the 2019 Modified Project. Further, as substantiated herein, the 2019 Modified Project would not result in significant environmental impacts requiring preparation of an Environmental Impact Report (EIR).

Based upon the information provided in this Addendum, the proposed 2019 Modified Project would not result in any new significant impacts, nor would the Modified Project result in a substantial increase in the severity of any previously-identified environmental impact considered in the 2000 MND. Therefore, an Addendum to the adopted 2000 MND is the appropriate document that will comply with CEQA requirements for the proposed 2019 Modified Project.

1.6 INTENDED USE OF THIS ADDENDUM

The City is the Lead Agency for the purposes of CEQA because it has the principal responsibility and authority for consideration of Project discretionary actions and associated permitting. As the Lead Agency, the City is also responsible for analyzing the Project's potential environmental impacts.

The Lead Agency will employ this Addendum in its evaluation of potential environmental impacts resulting from, or associated with, approval and implementation of the Project. This Addendum may also be used by various Responsible Agencies, e.g., Air Quality Management District(s), Regional Water Quality Control Board(s), *et al.*; as well as utilities and service providers when such entities issue discretionary permits necessary to carry out the Project. For example, if this Project would require discretionary permits from the South Coast Air Quality Management District (SCAQMD), this Addendum would serve as the environmental assessment for such permits (please refer to California Code of Regulations, Section 15050).

In employing this Addendum, the City and other agencies need to recognize that Project plans and development concepts identified herein are just that – plans and concepts that are subject to refinement as the Project is further defined. Acknowledging the potential for these future minor alterations to the Project, this Addendum in all instances evaluates maximum impact scenarios that would account for these minor alterations.

1.7 DOCUMENT ORGANIZATION

This Addendum is presented in five sections, as follows:

- **Section 1.0, *Introduction***, provides an overview of the 2019 Modified Project, its context, and environmental documentation applicable to the proposed development.
- **Section 2.0, *Modified Project – Description***, presents the proposed 2019 Modified Project in greater detail.
- **Section 3.0, *Analysis Summary***, summarizes the analysis of potential environmental impacts of the proposed 2019 Modified Project. The analysis considers potential effects of the 2019 Modified Project for all environmental topics addressed in the previously-approved 2000 MND. *CEQA Guidelines* topical issues incorporated pursuant to recent *Guidelines* amendments are also addressed. Please refer also to the Environmental Checklist Form presented at Addendum Appendix A.
- **Section 4.0, *Determination***, presents the determination regarding the appropriate environmental document for the Modified Project.
- **Section 5.0, *Mitigation Summary***, contains a table summarizing impacts and mitigation from the previously-approved 2000 MND, and presents any newly required mitigation or modified mitigation. Unless otherwise noted, mitigation previously required of the Original Project pursuant to the 2000 MND is also required of the proposed Modified Project.

1.8 CONCLUSION

This Addendum substantiates that implementation and operation of the proposed Modified Project land uses described and evaluated herein would not result in any significant new, different, additional, or substantially increased environmental impacts than were previously considered and addressed in the 2000 MND.

The environmental assessment of the proposed 2019 Modified Project does not require any major revision of the previously-approved 2000 MND, nor would the Modified Project result in conditions that would require preparation of a Subsequent or Supplemental MND, nor require preparation of an EIR.

2.0 2019 MODIFIED PROJECT - DESCRIPTION

2.0 2019 MODIFIED PROJECT – DESCRIPTION

2.1 BACKGROUND

As originally proposed in 2000, the Toyota South Campus (Campus) development concept envisioned a mix of office park uses, various training and vehicle preparation facilities, and a regional vehicle parts distribution warehouse. Within the following discussions, the 2000 Campus development concept is referred to as the “Original Project.” The Original Project comprised Phase I and Phase II development components.

The Original Project Phase I entitlements allowed for development of a 26,000-square-foot service garage; 241,680-square-foot customer service center; and a 366,360-square-foot financial service center and parking structure. The Original Project Phase II entitlements allowed for development of 351,360 square feet of general office uses. Total Phase I and II entitlements under the Original Project would allow for up to 985,400 square feet of development. As various Original Project facilities were implemented, supporting infrastructure and services were upgraded to respond to increasing demands of the facilities and their tenants.

CEQA documentation for the Original Project is presented in the *South Toyota Campus Plan Mitigated Negative Declaration* (MND), State Clearinghouse Number 2000101085, referred to herein as the 2000 MND. The City adopted the 2000 MND in November 2000.

Toyota vacated the Campus in late 2017 – early 2018. The Campus in its current state evidences various vacant structures, asphaltic and concrete paved areas, ancillary surface improvements (utility boxes, light standards, monument signs, etc.), areas of demolition, and other generally disturbed areas.

Much of the Campus in its current state represents an underutilized or functionally obsolete property, not indicative of the site's highest and best use. The 2019 Modified Project evaluated here supports reuse and redevelopment of the Campus in a manner that would further the City's General Plan vision for the subject site, while providing substantive economic benefits to the City and surrounding region.

Campus Reuse/Redevelopment Concept

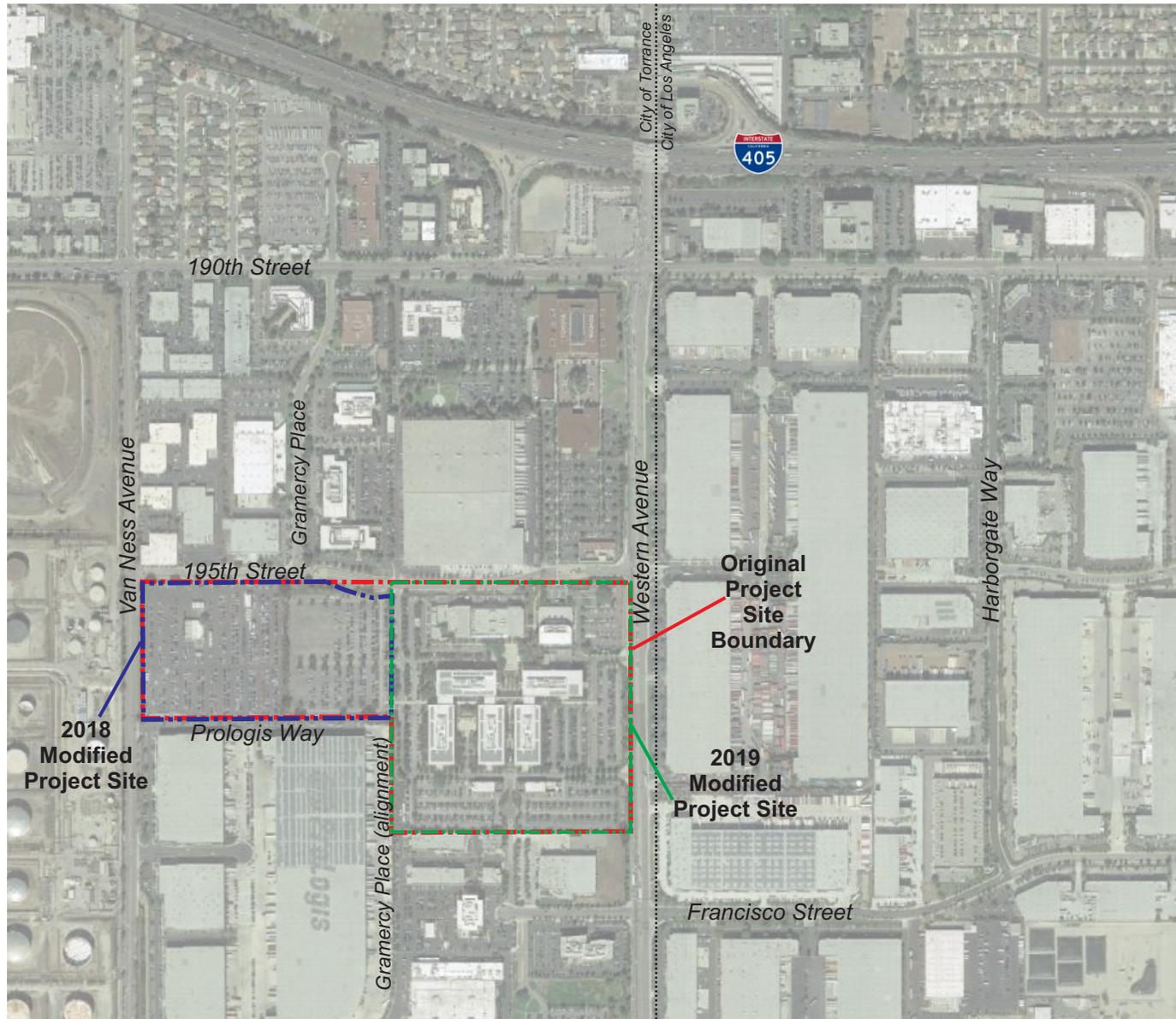
Subsequent to vacation of the Toyota Campus facilities, a concept for the Campus reuse and redevelopment was formulated, aligning with the City's vision for the subject site.

The Campus redevelopment concept envisions removal/demolition of existing uses and implementation of contemporary business park, light industrial, and manufacturing uses that respond to current and anticipated market demands. Redevelopment of the Phase II portion of the Original Project (the 2018 Modified Project) was previously approved by the City in April 2018. The 2019 Modified Project evaluated herein represents a further increment of the Campus redevelopment concept.

2.2 2019 MODIFIED PROJECT

2.2.1 2019 MODIFIED PROJECT SITE LOCATION

The 2019 Modified Project Site is located within the boundaries of the approximately 56-acre Original Project site. More specifically, the 2019 Modified Project Site comprises approximately 33.16 acres located southwesterly of the intersection of 195th Street (E – W) at Western Avenue (N – S) in the City of Torrance, CA. Western Avenue at this location is the City of Torrance/City of Los Angeles shared municipal boundary. Please refer to Figure 2.2-1, *2019 Modified Project - Site Location*.



NOT TO SCALE
 Source: Google Earth; Applied Planning, Inc.

Figure 2.2-1
 2019 Modified Project - Site Location

2.2.2 EXISTING LAND USES

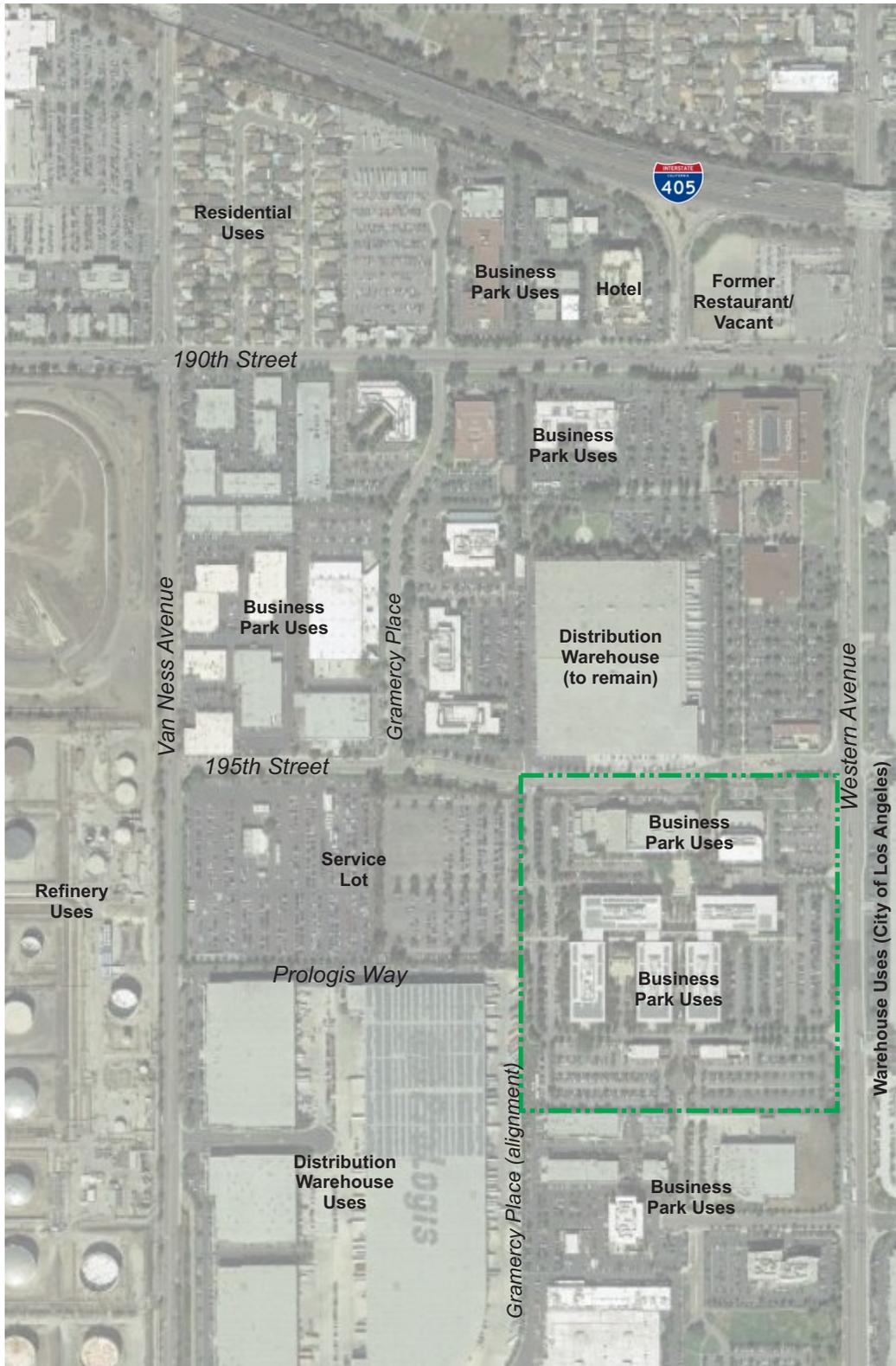
Existing land uses are illustrated at Figure 2.2-2. The 2019 Modified Project Site currently accommodates various vacant office buildings and ancillary structures in support of the encompassing Toyota Campus business park uses. Existing land uses of adjacent properties are summarized below:

- **North:** Distribution Warehouse
- **South:** Business Park Uses
- **East:** Warehouse Uses (City of Los Angeles)
- **West:** Warehouse and Industrial Park Uses

2.2.3 EXISTING LAND USE DESIGNATIONS

Existing vicinity General Plan Land Use and Zoning Designations are presented at Figures 2.2-3 and 2.2-4, respectively. The Modified Project Site is currently designated as Business Park (I-BP) under the City of Torrance General Plan Land Use Plan and is zoned Heavy Manufacturing (M-2). The Light Industrial uses proposed under the 2019 Modified Project are permitted, or are conditionally permitted under these designations, and no General Plan Land Use Amendment or Zone Change would be required to implement the 2019 Modified Project.

Easterly of the 2019 Modified Project site, across Western Avenue, properties are designated “Heavy Industrial” under City of Los Angeles General Plan Land Use Plan. City of Los Angeles Zoning of these properties is “Industrial” (M3). The 2019 Modified Project does not propose or require uses or activities that would affect existing City of Los Angeles General Plan Land Use or Zoning designations.



NOT TO SCALE

Source: Google Earth; Applied Planning, Inc.

Figure 2.2-2
Existing Land Uses

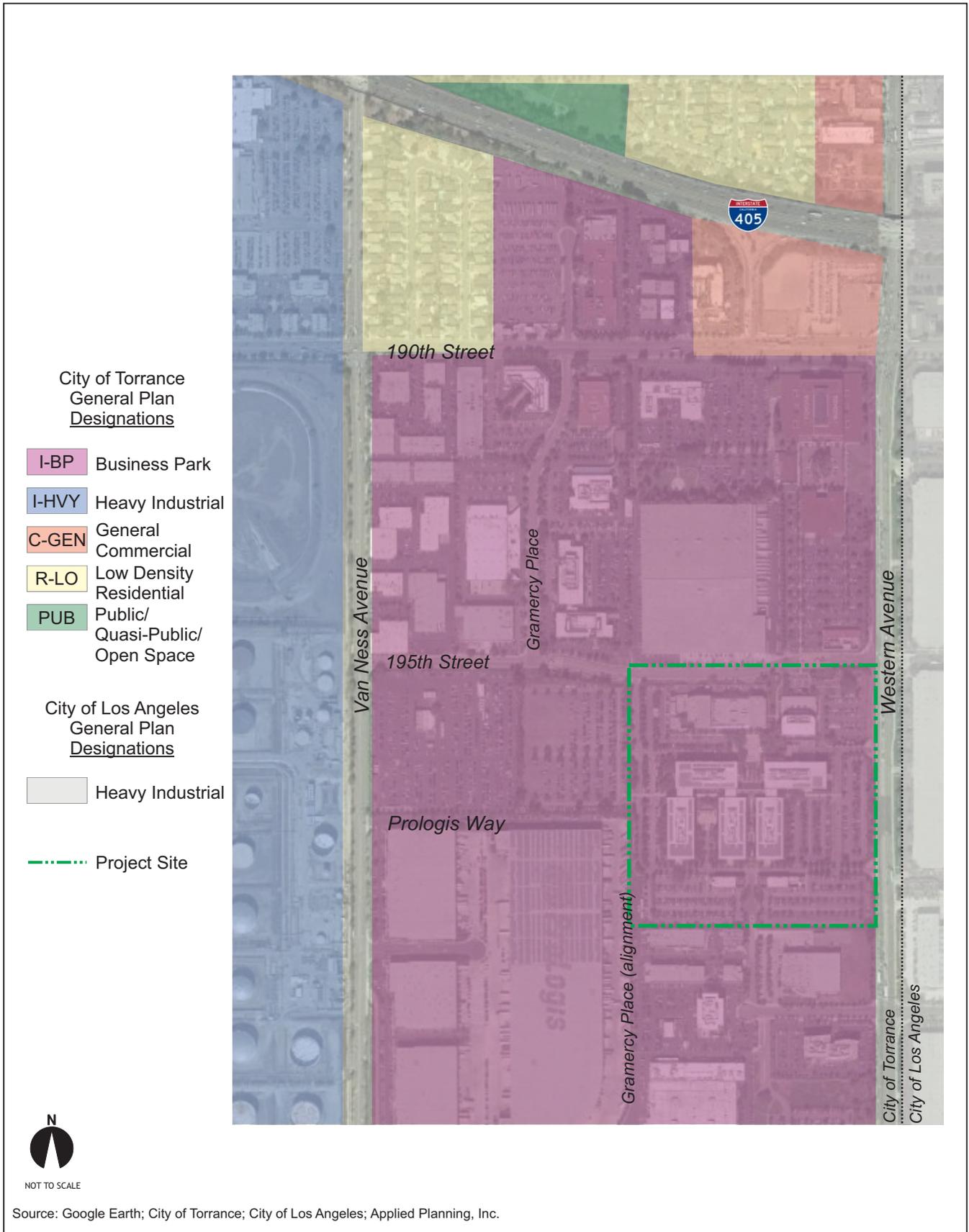


Figure 2.2-3
Existing General Plan Designations

City of Torrance
Zoning
Designations

- M1 - Light Manufacturing
- M2 - Heavy Manufacturing
- R1 - Single Family Residential
- C2 - General Commercial
- C3 - Solely Commercial
- C5 - Conditional Commercial
- PU - Public Use

City of Los Angeles
Zoning
Designations

- M3 - Heavy Industrial

----- Project Site



NOT TO SCALE

Source: Google Earth; City of Torrance; City of Los Angeles; Applied Planning, Inc.



Figure 2.2-4
Existing Zoning Designations

2.3 2019 MODIFIED PROJECT – PRIMARY ELEMENTS

2.3.1 Site Preparation

Site preparation activities would involve demolition of existing buildings, appurtenant structures, and surface improvements; excavation, fill, and grading. Preliminary grading and site development concepts indicate that the site would be retained in its existing essentially level condition. The Project grading concept would maintain a balanced site condition, with no substantive requirement for soil import or export.

2.3.2 Site Development Concept

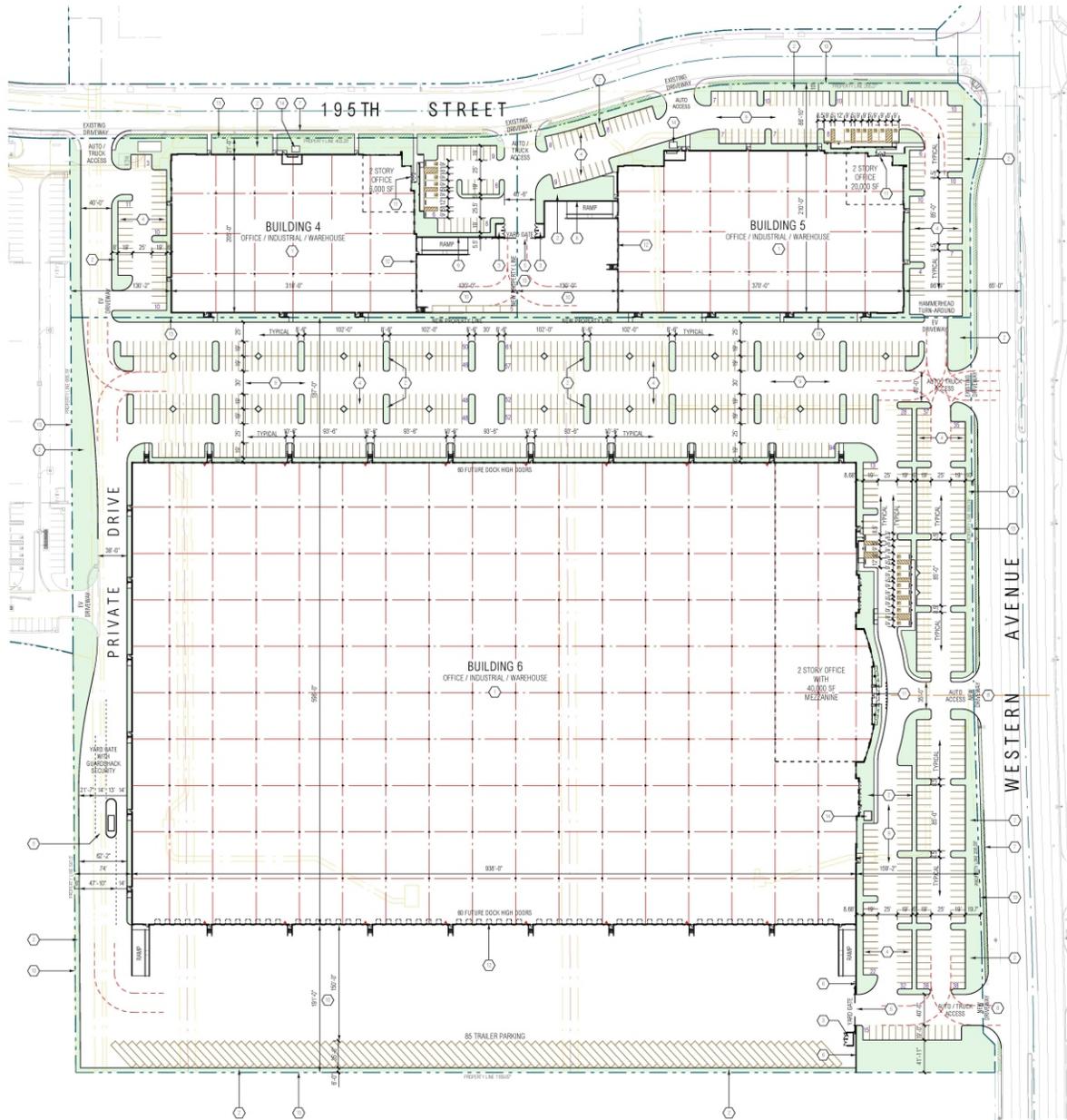
The 2019 Modified Project would apportion and redevelop the Phase I area of the Original Project site as summarized at Table 2.3-1. The 2019 Modified Project Site Plan Concept is presented at Figure 2.3-1.

Table 2.3-1
2019 Modified Project Development Summary

	Parcel Area	Building Area (Square Feet, Maximum)	Land Use
	+/- 26.17 Acres	Bldg. 6 – 605,003 Square Feet	United States Postal Service (USPS) build-to-suit International Parcel Handling Center Facility
	+/- 3.90 Acres	Bldg. 5 – 86,043 Square Feet	Industrial Park
	+/- 3.09 Acres	Bldg. 4 – 69,026 Square Feet	Industrial Park
Totals:	33.16 Acres	760,072 Square Feet	- - -

Source: Torrance Commerce Center Development Concept (SRG) May 2019.

Within the site, the proposed buildings would be oriented to internalize and screen site operations while providing articulated public facades. The final 2019 Modified Project site plan concept designs would be required to conform to provisions of City of Torrance Municipal Code Division 9 *Land Use*, Article 31 - *M-2 Heavy Manufacturing District*. The 2019 Modified Project uses are assumed to operate 7 days per week, 24 hours per day.



NOT TO SCALE
 Source: RGA; Applied Planning, Inc.

Figure 2.3-1
 2019 Modified Project - Site Plan Concept

As currently envisioned, proposed Building 6 would be a United States Postal Service (USPS) build-to-suit International Parcel Handling Center Facility.

Buildings 4 and 5 occupancies would be industrial park uses. For the purposes of this analysis, these buildings are each assumed to comprise 15 percent office area, 40 percent manufacturing area, and 45 percent warehouse area.

2.3.3 Access and Circulation

Regional access to the 2019 Modified Project site and surrounding areas is provided by Interstate 405 (I-405), Torrance Boulevard, Western Avenue (State Route 213, SR-213), 190th Street, and Del Amo Boulevard. Local Access to the 2019 Modified Project Site is provided by the Gramercy Place alignment (a private drive within the Project site) (N – S), 195th Street (E –W), and Western Avenue (N – S). The Gramercy Place alignment private drive, 195th Street, and Western Avenue comprise respectively, the westerly, northerly and easterly boundaries of the 2019 Modified Project Site.

The proposed Gramercy Place alignment private drive would intersect with 195th Street northwesterly of the 2019 Modified Project Site. Western Avenue and 195th Street intersect at the northeasterly corner of the 2019 Modified Project Site. Western Avenue connects to I-405 approximately 0.5 miles northerly of the 2019 Modified Project Site. Western Avenue connects to Torrance Boulevard approximately 0.8 miles southerly of the 2019 Modified Project Site.

Driveways and access to the 2019 Modified Project site from adjacent streets are indicated at Figure 2.3-1, *Modified Project – Site Plan Concept*. All roads, drive aisles, and access points implemented under the 2019 Modified Project would conform to City engineering standards and City of Torrance Fire Department requirements.

2.3.4 Parking

The current 2019 Modified Project Site Plan Concept provides passenger car vehicle parking areas allocated throughout the subject site adjacent to the proposed buildings. Additionally, the Building 6 parcel (the anticipated USPS facility) allocates areas for truck trailer parking/staging along the southerly boundary of the subject parcel, opposite the

Building 6 loading docks. Final parking area allocations, orientations, and configurations would be subject to review and approval by the City.

2.3.5 Landscape/Streetscape

All landscaping/streetscaping would comply with applicable provisions of the City Municipal Code and would maintain established landscape patterns approved under previous entitlements. The implemented landscape/streetscape concept would act to enhance perception of the site as developed under the 2019 Modified Project, and to screen views of the site interior from off-site vantages. Landscape and streetscape elements would provide shade and visual interest, define entry/access points, and accentuate site and architectural features.

2.3.6 Infrastructure/Utilities

2.3.6.1 Water/Sanitary Sewer Services

Water services would be provided to the 2019 Modified Project by the Torrance Municipal Water District (Buildings 4 and 5) and California Water Service (Cal Water) (Building 6). The 2019 Modified Project would connect to the existing reclaimed water system serving the site.

Sanitary sewer services would be provided to the Los Angeles County Sanitation Districts (LACSD). Water and sanitary sewer service extensions to the subject site would connect to existing facilities located in adjacent public rights-of-way. Final locations and alignments of service lines, and connection to existing services would be provided as required by the City, Cal Water, and LACSD.

2.3.6.2 Stormwater Management System

The 2019 Modified Project stormwater management system would implement drainage improvements and programs acting to control and treat stormwater pollutants. The 2019 Modified Project stormwater management system would be required to comply with applicable provisions of City of Torrance Municipal Code Chapter 11 *Low Impact Development Strategies for Development and Redevelopment*.

Components of the 2019 Modified Project stormwater management system would include a City-approved Storm Water Pollution Prevention Plan (SWPPP) and Standard Urban Stormwater Mitigation Plan (SUSMP).

Through implementation of the SWPPP and SUSMP, the proposed development would comply with requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit and other water quality requirements and storm water management programs specified by the Regional Water Quality Control Board (RWQCB). Implementation of the City-approved stormwater management system including the SWPPP and SUSMP; and compliance with NPDES Permit and RWQCB requirements act to protect City and regional water quality by preventing or minimizing potential stormwater pollutant discharges to the watershed.

2.3.6.3 Solid Waste Management

Solid waste generated by the 2019 Modified Project would be conveyed by existing service providers to the nearest accepting County landfills. The California Integrated Waste Management Act under the Public Resources Code required that local jurisdictions divert at least 50% of all solid waste generated by January 1, 2000.¹

The City is currently meeting or exceeding all state-mandated solid waste diversion targets acting to reduce potential impacts at serving landfills. The City remains committed to continuing its existing waste reduction and minimization efforts with the programs that are available through the City. The 2019 Modified Project would comply with the California Integrated Waste Management Act as implemented by the City.

Additionally, consistent with California Green Building Standards Code (CALGreen Code) Section 5.408 *Construction Waste Reduction, Disposal, and Recycling*, a minimum of 50 percent of nonhazardous construction and demolition waste generated by the 2019

¹ The California Legislature and Governor Brown have also established a goal of 75 percent recycling, composting or source reduction of solid waste by 2020 calling for the state and the Department of Resources Recycling and Recovery (CalRecycle) to take a statewide approach to decreasing California's reliance on landfills. The 2019 Modified Project would comply with all recycling/source reduction mandates as they become effective. See also: <<https://www.calrecycle.ca.gov/calendar/75percent>>

Modified Project would be recycled or salvaged for reuse. To these ends, a Construction Waste Management Plan would be prepared consistent with CALGreen Code Section 5.408.1.1. These measures would collectively reduce construction waste and would act to reduce total demands on solid waste management resources.

2.3.6.4 Electricity

Electrical service to the 2019 Modified Project would be provided by Southern California Edison (SCE). To the extent practical, and consistent with City Conditions of Approval, existing overhead lines within or adjacent to the 2019 Modified Project Site and new service lines serving the 2019 Modified Project use would be placed underground. Alignment of service lines and connection to existing services would conform to City and SCE requirements. Any necessary surface-mounted equipment, such as transformers, meters, service cabinets, and the like, would be screened and would conform to City building setback requirements. The undergrounding of SCE lines, connections to existing services, and implementation of appurtenant electrical improvements is consistent with and reflected within the total scope of development proposed by the 2019 Modified Project. Similarly, impacts resulting from the undergrounding of SCE lines, connections to existing services, and implementation of appurtenant electrical improvements would not be substantially different from, or greater than, impacts resulting from development of the 2019 Modified Project in total.

During construction, provision of temporary SCE service improvements may be required. The scope of such temporary improvements is consistent with and reflected within the total scope of development proposed by the 2019 Modified Project. Similarly, impacts resulting from the provision of temporary SCE service improvements would not be substantially different from, or greater than, impacts resulting from development of the 2019 Modified Project in total.

2.3.6.5 Natural Gas

Natural gas service would be provided by the Southern California Gas (SoCalGas). Existing service lines would be extended to uses implemented under the Modified Project. Alignment of service lines and connection to existing services would be as required by the City and SoCalGas.

During construction, provision of temporary SoCal Gas service improvements may be required. The scope of such temporary improvements is consistent with and reflected within the total scope of development proposed by the 2019 Modified Project. Similarly, impacts resulting from the provision of temporary SoCalGas service improvements would not be substantially different from, or greater than, impacts resulting from development of the 2019 Modified Project in total.

2.3.6.6 Communications Services

Communications services, including wired and wireless telephone and internet services are available through numerous private providers and would be provided on an as-needed basis. To the extent practical and consistent with City Conditions of Approval, existing and proposed wires, conductors, conduits, raceways, and similar communications improvements within the Project area would be installed underground. Any necessary surface-mounted equipment, e.g., terminal boxes, transformers, meters, service cabinets, etc., would be screened and would conform to City building setback requirements.

During construction, provision of temporary communication service improvements may be required. The scope of such temporary improvements is consistent with and reflected within the total scope of development proposed by the 2019 Modified Project. Similarly, impacts resulting from the provision of temporary communication service improvements would not be substantially different from, or greater than, impacts resulting from development of the 2019 Modified Project in total.

2.3.7 Police and Fire Protection Services

Police and fire protection services are currently available to the 2019 Modified Project Site and are listed below.

- Fire Protection Services: City of Torrance Fire Department
- Police Protection Services: City of Torrance Police Department

The City of Torrance has implemented a Development Impact Fee (DIF) program for police and fire protection services. The Project Applicant would be required to pay police and fire protection fees pursuant to the City DIF program, acting to offset the Project's incremental demands for police and fire protection services.

2.3.8 Energy Efficiency/Sustainability

Energy-saving and sustainable design features and operational programs would be incorporated into all facilities developed pursuant to the 2019 Modified Project. The 2019 Modified Project would be required to comply with incumbent energy efficiency and performance standards established under the CALGreen Code.

The 2019 Modified Project incorporates and expresses the following design features and attributes promoting energy efficiency and sustainability.

- The 2019 Modified Project would comply with incumbent Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6);
- To reduce water demands and associated energy use, development proposals within the 2019 Modified Project Site would be required to implement a Water Conservation Strategy and demonstrate a minimum 20% reduction in indoor water usage when compared to baseline water demand (total expected water demand without implementation of the Water Conservation Strategy).² The 2019 Modified Project would connect to the available reclaimed water system serving the site, acting to reduce potable water demands. The 2019 Modified Project would also be required to implement the following:

² Reduction of 20% indoor water usage is consistent with the current CalGreen Code performance standards for residential and non-residential land uses. Per CalGreen, the reduction shall be based on the maximum allowable water use per plumbing fixture and fittings as required by the California Building Standards Code.

- Landscaping palette emphasizing drought-tolerant plants consistent with provisions of the State Model Water Efficient Landscape Ordinance and/or City of Torrance requirements;
- Use of water-efficient irrigation techniques consistent with City of Torrance requirements;
- U.S. Environmental Protection Agency (EPA) Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and other plumbing fixtures.

2.3.9 Construction Area Traffic Management Plan

Temporary and short-term traffic detours and traffic disruptions could result during construction activities including implementation of access and circulation improvements noted above. Accordingly, the Applicant for the 2019 Modified Project would be responsible for the preparation and submittal of a Construction Area Traffic Management Plan (Plan). Typical elements and information incorporated in the Plan would include, but not be limited to:

- **Name of on-site construction superintendent and contact phone number.**
- **Identification of Construction Contract Responsibilities** - For example, for excavation and grading activities, describe the approximate depth of excavation, and quantity of soil import/export (if any).
- **Identification and Description of Truck Routes** - to include the number of trucks and their staging location(s) (if any).
- **Identification and Description of Material Storage Locations (if any).**
- **Location and Description of Construction Trailer (if any).**

- **Identification and Description of Traffic Controls** - Traffic controls shall be provided per the Manual of Uniform Traffic Control Devices (MUTCD) if the occupation or closure of any traffic lanes, parking lanes, parkways or any other public right-of-way is required. If the right-of-way occupation requires configurations or controls not identified in the MUTCD, a separate traffic control plan must be submitted to the City for review and approval. All right-of-way encroachments would require permitting through the City.
- **Identification and Description of Parking** - Estimate the number of workers and identify parking areas for their vehicles.
- **Identification and Description of Maintenance Measures** - Identify and describe measures taken to ensure that the work site and public right-of-way would be maintained (including dust control).

The Plan would be reviewed and approved by the City prior to the issuance of the first building permit. The Plan and its requirements would also be required to be provided to all contractors as one component of building plan/contract document packages.

2.3.10 Opening Year

For the purposes of this analysis, the 2019 Modified Project Opening Year is defined as mid-2021, by which time all proposed uses are assumed to be complete, occupied and operational.

2.4 OBJECTIVES of the 2019 MODIFIED PROJECT

The primary goal of the 2019 Modified Project is to redevelop and repurpose the Phase I Area of the Original Project with high quality light industrial and manufacturing uses. Complementary Objectives of the 2019 Modified Project include the following:

- Implement the City's General Plan through development that is consistent with the General Plan Land Use Element and applicable General Plan Goals, Objectives, Policies and Programs;

- Provide adequate roadway and wet and dry utility infrastructure to serve the 2019 Modified Project;
- Accommodate light industrial and manufacturing uses that are compatible with adjacent land uses;
- Provide an attractive, efficient, and safe environment for light industrial and manufacturing uses that are cognizant of natural and man-made conditions;
- Accommodate light industrial and manufacturing uses responsive to current and anticipated market demands;
- Establish new development that would increase locally available employment opportunities and would further the City's near-term and long-range fiscal goals and objectives; and
- Establish new development that would increase locally available employment opportunities thereby improving jobs/housing balance within the City.

2.5 DISCRETIONARY APPROVALS and PERMITS

Discretionary actions, permits, and related consultation(s) necessary to approve and implement the 2019 Modified Project include, but are not limited to, the following.

2.5.1 Lead Agency Discretionary Actions and Permits

- CEQA Compliance. Adoption of this Addendum;
- Approval of a Tier 2 Conditional Use Permit;
- DIV for Mapping;
- Approval of a Tentative Parcel Map; and
- Approval of a Modification (MOD) of previously-approved entitlements.

2.5.2 Other Consultation and Permits

Anticipated consultation and permits necessary to realize the 2019 Modified Project would likely include, but are not limited to, the following:

- Permitting may be required by/through the Regional Water Quality Control Board (RWQCB) pursuant to requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit.
- Permitting may be required by/through the South Coast Air Quality Management District (SCAQMD) for certain equipment or land uses that may be implemented pursuant to the Modified Project.
- Permitting by Caltrans for SR-213 (Western Avenue) access/encroachment permits.
- Permitting (i.e., utility construction and connection permits) from affected utility purveyors.
- Other ministerial permits necessary to realize all on and offsite improvements related to the development of the site.

3.0 ANALYSIS SUMMARY

3.0 ANALYSIS SUMMARY

3.1 INTRODUCTION

The following discussions summarize potential environmental impacts of development proposed by the 2019 Modified Project within the context of the environmental analysis presented in the 2000 MND. Included in this Section is a summary comparison of development and entitlements proposed by the 2019 Modified Project in relation to the Original Project evaluated in the 2000 MND.

The discussions presented here support the determination that the 2019 Modified Project would not result in new significant impacts, substantially different impacts, or impacts that would be substantially more severe than those evaluated and addressed in the 2000 MND. Environmental analysis beyond that presented within this *2019 Addendum to the 2000 MND for the Toyota South Campus Plan Project* (2019 Addendum) is not required.

3.2 ORIGINAL PROJECT, PROPOSED 2019 MODIFIED PROJECT

3.2.1 Original Project

The Original Project comprised Phase I and Phase II development components.

The Original Project Phase I entitlements allowed for development of a 26,000-square-foot service garage; 241,680-square-foot customer service center; and a 366,360-square-foot financial service center and parking structure. The Original Project Phase II entitlements allowed for development of 351,360 square feet of general office uses. Total Phase I and II entitlements under the Original Project would allow for up to 985,400 square feet of development. As various Original Project facilities were implemented, supporting infrastructure and services were upgraded to respond to increasing demands of the facilities and their tenants.

In 2018, the Phase II portion of the Original Project was re-entitled for development of up to 410,000 square feet of industrial park uses under the Approved 2018 Modified Project. CEQA documentation for the Approved 2018 Modified Project is presented in *2018 Addendum to the 2000 MND for the Toyota South Campus Plan Project* (SCH No. 2000101085) (2018 Addendum). The City adopted the 2018 Addendum in April 2018. The 2019 Modified Project evaluated herein represents a further increment of the Campus redevelopment concept.

3.2.2 2019 Modified Project

The 2019 Modified Project would apportion and redevelop the Phase I area of the Original Project site as summarized at Table 3.2-1. The 2019 Modified Project uses are assumed to operate 7 days per week, 24 hours per day. Please refer also to Addendum Section 2.0, *2019 Modified Project – Description*.

**Table 3.2-1
2019 Modified Project Development Summary**

	Parcel Area	Building Area (Square Feet, Maximum)	Land Use
	+/- 26.17 Acres	Bldg. 6 – 605,003 Square Feet	United States Postal Service (USPS) build-to-suit International Parcel Handling Center Facility
	+/- 3.90 Acres	Bldg. 5 – 86,043 Square Feet	Industrial Park
	+/- 3.09 Acres	Bldg. 4 – 69,026 Square Feet	Industrial Park
Totals:	33.16 Acres	760,072 Square Feet	---

Source: Torrance Commerce Center Development Concept (SRG) May 2019.

3.3 PREVIOUS ENVIRONMENTAL DOCUMENTATION, DOCUMENTS INCORPORATED BY REFERENCE

Section 15150 of the State *CEQA Guidelines* permits and encourages environmental documents to incorporate by reference other documents that provide relevant data. The documents outlined in this Section are hereby incorporated by reference, and the pertinent material is summarized throughout this Addendum. All documents

incorporated by reference are available through the City of Torrance Community Development Department, Planning Division, 3031 Torrance Blvd., Torrance, CA 90503.

- **2000 City of Torrance Mitigated Negative Declaration for the Toyota South Campus Plan Project, SCH No. 2000101085 (2000 MND).** The 2000 MND comprehensively addressed the potential environmental impacts resulting from the Original Project. The 2000 MND and all its supporting technical studies is incorporated in this Addendum by reference. Unless otherwise noted herein, mitigation measures incorporated in the 2000 MND are also applied to the proposed 2019 Modified Project.
- **2018 Addendum to the 2000 MND for the Toyota South Campus Plan Project (SCH No. 2000101085).** The 2018 Addendum to the 2000 MND comprehensively addressed potential environmental impacts resulting from the 2018 Modified Project. The 2018 MND Addendum provides background and context for evaluation of impacts that could occur under the proposed 2019 Modified Project.
- **City of Torrance General Plan.** The City of Torrance General Plan (General Plan) establishes City long-range planning Goals and Policies, and identifies planned land uses and supporting infrastructure systems supporting those goals and policies. The General Plan comprises the following Elements: Land Use, Circulation and Infrastructure, Community Resources, Safety, Noise, and Housing. Land uses and development under the Original Project and the proposed 2019 Modified Project are allowed under the site's current Business Park (I-BP) General Plan Land Use designation.
- **City of Torrance Zoning Code.** The City of Torrance Zoning Code regulates development within the City to ensure orderly and compatible growth. Standards and requirements of the Zoning Code act to implement Goals and Policies of the General Plan. Land uses and development under the Original Project and the

proposed 2019 Modified Project are permitted or conditionally permitted under the site's current Heavy Manufacturing (M-2) Zoning designation.

3.4 2000 MND AND 2019 ADDENDUM ENVIRONMENTAL CONCLUSIONS

3.4.1 Overview

The 2019 Modified Project would replace the Original Project Phase I entitlements (26,000-square-foot service garage; 241,680-square-foot customer service center; and 366,360-square-foot financial service center and parking structure) with up to 765,052 square feet of development comprising a USPS Parcel Handling facility, and mixed light industrial/manufacturing uses. Environmental impacts resulting from the 2019 Modified Project would, in no instance, be substantially different than or be substantially more severe than those evaluated and addressed in the 2000 MND.

3.4.2 Environmental Issues - Comparative Summaries

The following discussions summarize comparative impacts of the approved Original Project and the proposed 2019 Modified Project. Sequencing of topical issues here parallels their presentation within the 2000 MND.

3.4.2.1 Aesthetics

An analysis of potential aesthetic impacts is provided at 2000 MND Section 1, *Aesthetics*. The 2000 MND concluded that the Original Project would have no impacts or less-than-significant impacts related to aesthetics/light and glare. The 2019 Modified Project does not propose or require uses or activities that would substantially change any of the conclusions of the 2000 MND.

No new or substantially increased significant aesthetic/light and glare impacts would occur under the 2019 Modified Project.

3.4.2.2 Agriculture and Forest Resources

Potential impacts to agricultural resources are addressed at 2000 MND Section 2, *Agriculture Resources*. The 2000 MND concluded that the Original Project would have no impacts affecting agricultural resources. It is noted that the topic of “Forest Resources” is a recent addition to the CEQA checklist and was not evaluated as part of the 2000 MND.

Agricultural resources conditions at the subject site and the surrounding area have not changed since the preparation of the 2000 MND. The area remains devoid of any designated or valuable farmlands. The 2019 Modified Project would have no impact on farmland resources.

The 2019 Modified Project Site is not zoned for forest land, timberland, or timberland zoned Timberland Production. The 2019 Modified Project would have no impact on forest land or timberland.

No new or substantially different or substantially increased agricultural or forest resources impacts would occur under the 2019 Modified Project.

3.4.2.3 Air Quality

Potential air quality impacts are addressed at 2000 MND Section 3, *Air Quality*. The 2000 MND determined that the Original Project would result in significant impacts concerning conflict with applicable Air Quality Management Plan (AQMP); violation of applicable air quality standards; and cumulatively considerable increases to non-attainment conditions. The 2000 MND recognizes however that the Original Project would not result in any significant air quality impacts not already disclosed in the 1992 General Plan EIR and addressed in the City’s Statement of Overriding Consideration (SOC) adopted in connection with adoption of the General Plan and certification of the 1992 General Plan EIR.

As substantiated in this Addendum and supporting Air Quality/Greenhouse Gas Analysis (AQ/GHG Analysis) prepared for the 2019 Modified Project (Addendum Appendix B), the 2019 Modified Project uses would result in a net reduction in aggregate

air pollutant emissions when compared to the Original Project. The Addendum discussions substantiate further that the 2019 Modified Project uses would not result in exceedance of any applicable South Coast Air Quality Management District (SCAQMD) significance thresholds. None of the significant air quality impacts attributable to the Original Project noted in the 2000 MND would occur under the 2019 Modified Project. Moreover, the Addendum discussions substantiate that the 2019 Modified Project would not conflict with the applicable AQMP. The 2019 Modified Project would therefore not result in new or substantively different or substantively increased impacts concerning conflict with applicable AQMP; violation of applicable air quality standards; and cumulatively considerable increases to non-attainment conditions.

The 2000 MND concluded that the Original Project would have no impacts related to exposure of sensitive receptors to substantial pollutant sources. The 2019 Modified Project would result in an aggregate net decrease in air pollutant emissions when compared to the Original Project, and on this basis would generally reduce the potential for exposure of sensitive receptors to substantial pollutant concentrations. Moreover, the Health Risk Assessment (HRA) prepared as one component of the 2019 Modified Project AQIA substantiates that the 2019 Modified Project would not result in potentially significant health risks, or otherwise result in potential exposure of sensitive receptors to substantial pollutant concentrations. The 2019 Modified Project would therefore not result in new or substantively different or substantively increased impacts concerning exposure of sensitive receptors to substantial pollutant concentrations.

The 2000 MND concluded that the Original Project would have no impacts related to creation of objectionable odors affecting a substantial number of people. As with the Original Project, the 2019 Modified Project does not propose or require uses or activities that would create objectionable odors. The 2019 Modified Project would therefore not result in new or substantively different or substantively increased impacts concerning creation of objectionable odors that could affect a substantial number of people.

No new or substantively different or substantively increased air quality impacts would occur under the 2019 Modified Project. Moreover, in comparison to the Original Project,

air quality impacts in the aggregate would be diminished under the 2019 Modified Project.

3.4.2.4 Biological Resources

The 2000 MND addressed potential biological resources impacts at Section 4, *Biological Resources*, and concluded that the Original Project would have no impact on biological resources. Biological resources conditions at the subject site and the surrounding area have not changed since the preparation of the 2000 MND. The area remains devoid of any sensitive or protected biological resources. As with the Original Project, the 2019 Modified Project would have no impact on biological resources.

No new or substantially increased biological resources impacts would occur under the 2019 Modified Project.

3.4.2.5 Cultural Resources

The 2000 MND addressed potential cultural resources impacts at Section 5, *Cultural Resources*, and concluded that the Original Project would result in no impacts to historical, archaeological, or paleontological resources.

Cultural resources conditions at the subject site and the surrounding area have not changed since the preparation of the 2000 MND. The area remains devoid of any evident historic resources, archaeological resources, paleontological resources, unique geologic resources, or presence of human remains. 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 recent (November 2017) California Historical Resources Information System (CHRIS) Records Search that encompasses the 2019 Modified Project Site.¹ The CHRIS Records Search identified no known potentially significant cultural resources within the 2019 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

¹ South Central Coastal Information Center (SCCIC) File # 18297.4314, 11/27/2017; available through the City of Torrance Planning Division.

by the Lead Agency. The Applicant would comply with recommendations of the 2017 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 2019 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 2019 Modified Project.

3.4.2.6 Energy

The environmental topic of Energy emissions was added to the *CEQA Guidelines Appendix G Environmental Checklist Form* in 2019. The potential for the Original Project to result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources was not evaluated in the 2000 MND. Nor was the potential for the Original Project to conflict with or obstruct a state or local plan for renewable energy or energy efficiency evaluated in the 2000 MND.

No changed or new information has been identified to indicate that any potential energy impacts resulting from the 2019 Modified Project would be substantially greater than or different from those that would result from development under the Original Project. In fact, the 2019 Modified Project would be required to conform to more stringent energy efficiency standards than were applied to the Original Project. Enhanced energy efficiencies and comparative energy consumption reductions under the 2019 Modified Project can therefore be inferred.

No new or substantially increased energy impacts would occur under the 2019 Modified Project.

3.4.2.7 Geology and Soils

The 2000 MND addressed potential geology and soils impacts at Section 6, *Geology and Soils*, and concluded that the Original Project would have no impact on geology or soils, or that potential impacts of the Original Project would be less-than-significant.

Underlying geology/soils conditions at the subject site and the surrounding area have not changed since the preparation of the 2000 MND. As part of the City's standard review and approval of development projects, the 2019 Modified Project would be required to comply with requirements of a final City-approved geotechnical report, and applicable provisions of the Uniform Building Code (UBC) and California Building Code (CBC), to include design- and site-appropriate means to avoid or minimize any fault rupture, seismic soils conditions, or ground shaking concerns.

No new or substantially increased geology and soils impacts would occur under the 2019 Modified Project.

3.4.2.8 Greenhouse Gases

The environmental topic of Greenhouse Gas (GHG) emissions was added to the *CEQA Guidelines Appendix G Environmental Checklist Form* in 2010. 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. Nor was 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 evaluated in the 2000 MND.

Potential greenhouse gas emissions impacts of the 2019 Modified Project uses is presented in the 2019 Modified Project AQ/GHG Analysis (Addendum Appendix B). The 2019 Modified Project AQ/GHG Analysis substantiates that the Modified Project would not generate GHG emissions that may have a significant impact on the environment; and that the potential for the 2019 Modified Project to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases would be less-than-significant. No changed or new information has been identified to

indicate that any potential GHG emissions impacts resulting from the 2019 Modified Project would be substantively greater than or different from those that would result from development under the Original Project. In fact, because the 2019 Modified Project would result in a net decrease in trip generation and vehicle miles traveled (VMT) when compared to the Original Project, associated reductions in vehicular-source and total greenhouse gas emissions can be inferred.

No new or substantially increased GHG emissions impacts would occur under the 2019 Modified Project.

3.4.2.9 Hazards and Hazardous Materials

Potential hazards and hazardous materials impacts are addressed at 2000 MND Section 7, *Hazards and Hazardous Materials*. The 2000 MND concluded that the Original Project would result in no impacts related to hazards or hazardous materials.

The 2019 Modified Project would not result in or cause exposure(s) to hazards or potentially hazardous conditions. That is, uses proposed under the 2019 Modified Project uses are not considered hazardous. 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.

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 2019 Modified Project Site. As with the Original Project, the 2019 Modified Project is required to comply with all City and County Hazardous Materials Management Plans and regulations addressing transport, use, storage and

disposal of these materials. The 2019 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.

No new or substantially increased hazards/hazardous material impacts would occur under the 2019 Modified Project.

3.4.2.10 Hydrology and Water Quality

Potential hydrology and water quality impacts are addressed at 2000 MND Section 8, *Hydrology and Water Quality*. The 2000 MND determined that the Original Project would result in no impacts to hydrology and water quality, or that potential hydrology and water quality impacts of the Original Project would be less-than-significant.

As with the Original Project, the 2019 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, all wastewater and stormwater discharges generated by the 2019 Modified Project would be directed to the appropriate receiving and treatment system(s).

The 2019 Modified Project is not located near any surface waters and is not located in an area subject to flooding. The 2019 Modified Project would therefore not implement structures that would impede or redirect flood waters or otherwise affect floodplain or flooding conditions. The 2019 Modified Project does not propose or require housing and would therefore not place housing within a 100-year floodplain. The 2019 Modified Project Site is not located proximate to dams or any substantial bodies of water and is therefore not subject to inundation by dam failure, seiche, or tsunami. The 2019 Modified

Project Site and surrounding areas are level and stable and not subject to inundation by mudflow.

As with the Original Project, the 2019 Modified Project would comply with requirements of the UBC, CBC, and Torrance Municipal Code, directing drainage and surface runoff from the 2019 Modified Project to the available storm drain system. Further, the 2019 Modified Project would be required to comply with current water quality standards and stormwater discharge requirements. These current standards and requirements are globally more stringent than those in effect at the time the 2000 MND was prepared.

No new or substantially increased hydrology and water quality impacts would occur under the 2019 Modified Project.

3.4.2.11 Land Use and Planning

Potential land use and planning impacts are addressed at 2000 MND Section 9, *Land Use and Planning*. The 2000 MND notes that the Original Project site was designated as "Business Park" in the City 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 is consistent with the Business Park designation. Moreover, the Original Project land uses are 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 land use and planning impacts.

As with the Original Project, land uses and development concepts proposed under the 2019 Modified Project are allowed under the site's current City General Plan Land Use designation (Business Park, I-BP); and are permitted or conditionally permitted under the site's current Zoning designation (Heavy Manufacturing, M-2). The 2019 Modified Project does not propose or require a General Plan Land Use amendment or change in

Zoning. The 2019 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 2019 Modified Project would have no potential to conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The 2019 Modified Project would be implemented within an area that is developed with (vacant) office buildings and ancillary uses. The 2019 Modified Project would not result in division of established community. No established communities exist within the 2019 Modified Project Site, nor would the 2019 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 2019 Modified Project would have no potential to physically divide an established community.

The 2019 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 2019 Modified Project would have no potential to conflict with any applicable habitat conservation plan or natural community conservation plan.

No new or substantially increased land use and planning impacts would occur under the 2019 Modified Project.

3.4.2.12 Mineral Resources

An analysis of potential mineral resources impacts is provided at 2000 MND Section 10, *Mineral Resources*. The 2000 MND concluded that no impacts related to mineral resources would occur as the result of the Original Project.

Underlying conditions at the subject site have not changed since preparation of the 2000 MND, and the subject site remains devoid of any valuable or locally-important mineral resources. On this basis, as with the Original Project, the 2019 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.

No new or substantially increased mineral resources impacts would occur under the 2019 Modified Project.

3.4.2.13 Noise

Potential noise impacts are addressed at 2000 MND Section 11, *Noise*. The 2000 MND concluded that the Original Project would have no noise impacts, or that noise impacts of the Original Project would be less-than-significant.

The 2019 Modified Project does not propose or require uses or activities that would substantively change any of the conclusions of the 2000 MND. The Modified Project would comply with applicable provisions of the City of Torrance Municipal Code, to ensure that temporary or periodic construction-source noise and construction-source vibration generated by the 2019 Modified Project would not result in exposure of persons to or generation of noise levels in excess of applicable standards.

Additionally, the Noise Impact Assessment prepared for the 2019 Modified Project (*Torrance Commerce Center Noise Impact Assessment Memorandum* [Urban Crossroads, Inc.] June 13, 2019) substantiates that operational stationary/area-source noise generated by the 2019 Modified Project uses would not result in noise levels that would exceed applicable City noise standards.

Further, trip generation under the proposed 2019 Modified Project land uses would be incrementally reduced when compared to trip generation of the Original Project uses. Vehicular-source noise generated by the 2019 Modified Project would therefore be reduced when compared to the Original Project.

No new or substantially increased noise impacts would occur under the 2019 Modified Project.

3.4.2.14 Population and Housing

Potential population and housing impacts are addressed at 2000 MND Section 12, *Population and Housing*. The 2000 MND concluded that the Original Project would have no impact on population and housing.

The 2019 Modified Project does not propose or require uses or activities that would substantially change any of the conclusions of the 2000 MND. That is, the 2019 Modified Project does not propose new housing or the removal of housing that would affect City population estimates, or that would affect the availability of housing. As with the Original Project, the 2019 Modified Project would result in no population and housing impacts.

No new or substantially increased population and housing impacts would occur under the 2019 Modified Project.

3.4.2.15 Public Services

Potential public services impacts are addressed at 2000 MND Section 13, *Public Services*. 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 impacts.

All public services are available to the 2019 Modified Project. Consistent with the Original Project, the 2019 Modified Project would be served by existing services. The 2019 Modified Project would incrementally contribute to demands for public services generally.² 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 2019 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 2019 Modified Project would have no potential to result in substantial adverse

² No residential component is proposed under the 2019 Modified Project; no school aged populations would be generated, and the 2019 Modified Project would not substantially affect school services.

physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts.

No new or substantially increased public services impacts would occur under the 2019 Modified Project.

3.4.2.16 Recreation

Potential recreational facilities impacts are addressed at 2000 MND Section 14, *Recreation*. The 2000 MND concluded that the Original Project would have no impact related to parks or recreational facilities.

As with the Original Project, the 2019 Modified Project would not generate substantial resident populations, and therefore would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of a facility would occur or be accelerated; or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

No new or substantially increased recreation impacts would occur under the 2019 Modified Project.

3.4.2.17 Transportation

Potential transportation/traffic impacts are addressed at 2000 MND Section 15, *Transportation/Traffic*. The 2000 MND concluded that with incorporation of mitigation, no adverse impacts related to transportation/traffic would occur as the result of the Original Project. Mitigation measures incorporated in the 2000 MND are listed below.

2000 MND Transportation/Traffic 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.³

b) Western Avenue at 190th Street. Widen Western Avenue to provide a separate southbound right-turn-only lane. Modify signal accordingly.⁴

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.⁵

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.

The 2019 Modified Project does not propose or require uses or activities that would substantially change any of the conclusions of the 2000 MND. In these regards, the 2019 Modified Project would generate fewer peak hour and total daily trips than would the

³ Improvements have been completed; therefore, this mitigation measure has not been carried forward.

⁴ Improvements have been completed; therefore, this mitigation measure has not been carried forward.

⁵ Improvements have been completed; therefore, this mitigation measure has not been carried forward.

Original Project and would result in diminished traffic impacts when compared to the Original Project.⁶

Under the 2019 Modified Project, appropriate transportation/traffic mitigation measures from the 2000 MND, or equivalent requirements stipulated through City Conditions of Approval, have been carried forward. The City has determined which of the mitigation measures identified in the 2000 MND have been completed and/or are no longer determined necessary. The remaining measures and additional Conditions of Approval shall be implemented as directed by the City. Of the original mitigation measures, the following remain and are incorporated herein as Mitigation Measures TR-1 through TR-2.

TR-1) 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-2) 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.

CEQA Guidelines Section 15064.3, subdivision (b) was added to the CEQA Guidelines in 2019. The Vehicle Miles Traveled (VMT) metric established under Section 15064.3 is recognized. The VMT metric is effective as of July 2020. The VMT metric and related provisions were therefore not considered in the 2000 MND. Further, the VMT metric and related provisions have not yet been adopted or implemented by the City. Pending City adoption and implementation of a VMT analysis methodology/VMT thresholds, current jurisdictional LOS analysis methodologies and LOS deficiency criteria are reflected in this Addendum analysis.

⁶ See: *Trip Generation Summary*, Addendum Appendix D.

The 2019 Modified Project does not propose or require uses or facilities that would result in potentially significant transportation/traffic impacts.

No new or substantially increased transportation impacts would occur under the 2019 Modified Project.

3.4.2.18 Tribal Cultural Resources

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

Evaluation of impacts to TCRs pursuant to *AB 52, Gatto. Native Americans: California Environmental Quality Act* applies only to 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 2019 Modified Project would not be required to file any of the referenced documents, the provisions of AB 52 addressing potential impacts to TCRs is not applicable within the context of this Addendum analysis.

3.4.2.19 Utilities/Service Systems

Potential utilities and service systems impacts are addressed at 2000 MND Section 16, *Utilities and Service Systems*. The 2000 MND concluded that the Original Project would have no impact on utilities and service systems.

Since approval of the Original Project, development of the Toyota Campus in total has been substantially completed, including implementation of any necessary backbone infrastructure/utility systems improvements. The 2019 Modified Project would result in development intensities and related demands on utilities and services that are no greater than is anticipated for the subject site, and that are comparable to the Original Project. The 2019 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

2019 Modified Project would have no potential to adversely affect utilities and service systems.

No new or substantially increased utilities/service systems impacts would occur under the 2019 Modified Project.

3.4.2.20 Wildfire

The topic of Wildfire is a recent addition to the CEQA checklist and was not evaluated as part of the 2000 MND.

Wildfire conditions at the subject site and the surrounding areas have not changed since the preparation of the 2000 MND. As was the case when the 2000 MND was prepared, the subject site and surrounding areas are not located within or near a state responsibility area, or within an area classified as a very high fire hazard severity zone. No new or substantially increased wildfire impacts would occur as a result of the 2019 Modified Project.

3.4.2.21 Mandatory Findings of Significance

The 2000 MND concluded that with incorporation of mitigation, the Original Project would not degrade the quality of the environment; would not have impacts that are individually limited, but cumulatively considerable; and would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

The 2019 Modified Project does not propose or require uses or activities that would substantially change any of the conclusions of the 2000 MND. Where applicable, mitigation proposed in the 2000 MND has been carried forward in this 2019 Addendum. Supplemental City Conditions of Approval are incorporated in this Addendum where appropriate.

No new or substantially increased environmental impacts would occur under the 2019 Modified Project and no substantial revisions to the 2000 MND are required.

4.0 DETERMINATION

4.0 DETERMINATION

As supported by the analysis presented in this Addendum, the potential environmental effects of the development allowed by the Modified Project, and associated required discretionary actions, have been adequately addressed in the previously-approved 2000 MND. This Addendum provides minor technical changes to the 2000 MND analysis. As such, the development of any further information and analysis is not warranted. Pursuant to the requirements of *CEQA Guidelines* Section 15162 and 15164, the following determinations have been made.

Major Revisions to the MND Not Required

Based on the preceding analysis and information, there is no evidence that major changes to the 2000 MND are required. Comparison of the previous project with the Project described in this Addendum indicates that there is no new significant or more severe environmental impact, and that the development of the Project described herein would essentially have the same impacts as those described in the 2000 MND.

No Substantial Change in Circumstances Requiring Major Revisions to the MND

No information exists in the record, or is otherwise available that indicates that there are substantial changes in circumstances that would require major changes to the 2000 MND.

No New Information Showing Greater Significant Effects than Identified in the MND

This Addendum has considered all available relevant information to determine whether there is new information, which was not available at the time the 2000 MND was prepared, that may indicate that a new significant effect may occur that was not reported in the 2000 MND. As supported by the analysis presented in this Addendum,

there is no substantial new information that was not available at the time of the 2000 MND, indicating that there will be a new, significant impact requiring major revisions of the 2000 MND.

No New Information Showing Ability to Reduce Significant Effects Identified in the MND

The Addendum analysis substantiates that there are no significant impacts requiring identification of new or additional alternatives to the Project. The continued implementation of applicable 2000 MND mitigation measures reduce the Project's potentially significant impacts to levels that are less-than-significant.

Summary

The analysis presented in this document substantiates that the analysis presented in the previously-approved 2000 MND is sufficient to satisfy CEQA requirements for the proposed Project. That is, with incorporation of mitigation, implementation of the Addendum Project described and evaluated herein will not result in any significant new, different, additional, or substantially increased environmental impacts than were previously considered and addressed in the 2000 MND. As such, environmental assessment of the Addendum Project does not require any major revision of the previously-approved 2000 MND, nor will the development allowed by the Addendum Project result in conditions that would require preparation of further analysis as described in the *CEQA Guidelines*.

5.0 MITIGATION SUMMARY

5.0 MITIGATION SUMMARY

5.1 OVERVIEW

The following Table 5.1-1, *Mitigation and Implementation Summary Matrix*, comprehensively presents mitigation measures incorporated in the 2000 IS/MND, and associated with the development of the Addendum Project described herein.

Within the “Mitigation Measures” column, Mitigation Measures that are no longer required are indicated by ~~strikeout font~~, new Mitigation Measures are indicated by ***bold italic text***. The “Remarks” column identifies status and applicability of Mitigation Measures. Retained or new mitigation measures presented at Table 5.1-1 will be implemented through Project Conditions of Approval or as otherwise deemed appropriate by the City.

At the discretion of the City Community Development Director, any of the mitigation measures identified at Table 5.1-1 may be modified to respond to conditions and context as they may apply to development proposed by the Addendum Project. Any such discretionary modifications cannot result in any new significant environmental impacts; rather, modifications would ensure compliance and consistency with current City goals, policies, regulations, and development programs/plans.

Table 5.1-1 Mitigation and Implementation Summary Matrix		
2000 IS/MND Mitigation Measures	Remarks	Replacement Mitigation
Transportation/Traffic		
<i>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.</i>	Improvements have been completed, as required.	N/A
<i>b) Western Avenue at 190th Street. Widen Western Avenue to provide a separate southbound right turn only lane. Modify signal accordingly.</i>	Improvements have been completed, as required.	N/A
<i>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.</i>	Improvements have been completed, as required.	N/A

Table 5.1-1 Mitigation and Implementation Summary Matrix		
2000 IS/MND Mitigation Measures	Remarks	Replacement Mitigation
<i>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.</i>	Applicable to Addendum Project; incorporated in the 2018 Addendum as Mitigation Measure TR-4.	<i>TR-1) 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.</i>
<i>e) 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.</i>	Applicable to Addendum Project; incorporated in the 2018 Addendum as Mitigation Measure TR-5.	<i>TR-2) 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.</i>

Sources: 2000 IS/MND; Applied Planning, Inc.