

## **Attachment 7 - Fashion Square at Del Amo**

3405 Carson Street (APN 7366-019-123)

21405, 21515 Madrona Avenue (APN 7366-019-182, 7366-019-183)

The purpose of this attachment is to respond, in writing, to public comments received on environmental issues on the Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Fashion Square at Del Amo project (proposed project). The City of Torrance Community Development Department received a total of nine comment letters, eight comments from individuals and one letter from a public agency, as shown in Table 1 below.

The City of Torrance Community Development Department is providing the responses in Table 1 although not required by CEQA (see CEQA Guidelines Section 15088). The City of Torrance Community Development Department considered the comments received on the draft IS/MND, evaluated the issues raised and found that the comments did not provide new information; they did not identify any new significant impacts or an increase in severity of previously identified impacts; and they do not identify or result in additional feasible mitigation measures.

**Table 1: Fashion Square at Del Amo Response to Comments**

Name of Commenter	Type of Commenter	Main Issues Raised	Response
Erika Jerez	Individual	Increase in traffic and noise in the project vicinity, increase pressure on utilities; suggested scaling down the project	<b>Traffic:</b> Please note that with Senate Bill 743 (SB743) becoming effective statewide in July 2020, automobile delay (LOS) is not considered to be a significant environmental effect under CEQA. Pursuant to SB 743, CEQA requires the evaluation of VMT when analyzing a project's environmental effects on transportation. Therefore, the LOS analysis was provided for informational purposes only, and the project was found to be consistent with City of Torrance General Plan. As outlined in Section 4.17, Transportation, of the IS/MND with implementation of proposed intersection improvements, the proposed project would not generate a substantial number of daily or peak-hour vehicle trips to warrant modifications to any other transportation facilities. The addition of project traffic to the circulation system would exceed the LOS threshold at one of the 27 study intersections (Prairie Avenue/Redondo Beach Boulevard). The project proposes to restripe the intersection's southbound approach within the City of Lawndale and the southbound departure within the City of Torrance to include an additional through lane. In addition, the existing traffic signal would be modified as necessary.
You Jerome Funt	Individual	Bad location for project due to traffic and crime; decrease in property values	<b>Traffic:</b> see above
Sandra Will	Individual	Worried about increase in traffic and pollution; ask City to consider running busses at 20 minute intervals city wide to offset increase in car trips	<b>Traffic:</b> see above <b>Air Quality:</b> As outlined in Section 4.3 Air Quality, project construction emissions would be below Short – Term Regional Construction Emissions thresholds as established by the South Coast Air Quality Management District (SCAQMD) is the regional government agency that monitors and regulates air pollution within the project Basin. In addition, as shown in Table AQ-4, the project

			operational emissions would also be below established thresholds. Table AQ-5, further indicate that the project would not result in an exceedance of SCAQMD localized significance analysis during project construction or operation, which analyzed impact at 115 feet from the project site.
Kara Ryan	Individual	Concerns regarding increase in traffic, parking and pollution from project implementation; concerns to livability of the area	See <b>Traffic</b> and <b>Air Quality</b> responses above
Lisa Maguire and D Belitz (submitted same letter)	Individuals	Concerns regarding community character; traffic and safety impacts; noise increase; aesthetic impact; conditional use and community input process	See <b>Traffic</b> and <b>Air Quality</b> responses below  <b>Aesthetic Character:</b> As outlined in Section 4.1 Aesthetics of the IS/MND, the project was designed to provide step backs from existing viewpoints, by planning for step backs from Madrona Avenue, with building heights increasing from Madrona Avenue and West Carson Street, thus providing a visual transition from the existing residential neighborhood to the proposed project. In addition to the proposed step back, all final project designs would be subject to City review and approval.  <b>Noise:</b> Section 4.13 Noise of the IS/MND includes a discussion of potential noise increases during both construction and operation. It is expected that average noise levels during construction at the nearest sensitive receptors, the single-family homes to the east, would approach 72 dBA $L_{eq}$ during the grading phase, which would take place for a duration of approximately 61 weeks, at different locations throughout the site. Average noise levels during other construction phases would range from 59 dBA $L_{eq}$ to 72 dBA $L_{eq}$ . However, compliance with the allowed hours in the City's Noise Ordinance would ensure that construction noise does not disturb

			<p>residents during typical sleeping hours or during hours when ambient noise levels are likely to be lower (i.e., at night). Although construction noise would be higher than the ambient noise in the vicinity of the project site, it would cease to occur once project construction is completed. Additionally, with the incorporation of Regulatory Compliance Measure NOI-1, all feasible and reasonable measures to reduce construction noise would be implemented and a less than significant impact would occur.</p> <p>In addition, the project specific analysis found that the increase in noise associated with project-related traffic would be very small, ranging from 0.0 to 0.6 dBA along the segments analyzed. These noise level increases are not perceptible by the human ear; therefore, off-site traffic noise impacts would be less than significant.</p>
Teresa Evans	Individual	Asks to stop project due to increase in traffic	See <b>Traffic</b> Response below
Thomas Dorsey	Individual	Supports project if reduced to four stories	
Department of Toxic Substances Control	Agency	DTSC Recommends that a Soil Management Plan be implemented at the project site; that the City of Torrance enter into a voluntary agreement and that all imported soil and fill material be tested.	See Mitigation Measure HAZ-1 Soil Management Plan; see <b>Condition of Approval 34</b> for coordination of voluntary agreements and <b>Condition of Approval 35</b> for testing of imported soil.

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**From:** CDD Info <cddinfo@TorranceCA.gov>  
**Sent:** Monday, October 14, 2024 8:36 AM  
**To:** Niemeyer, Natalie  
**Cc:** Oorts, Leo  
**Subject:** FW: Overcrowding is a concern

CDD INFO  
Community Development  
Email: cddinfo@TorranceCA.gov

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-----Original Message-----

From: Erika Jerez [REDACTED]  
Sent: Saturday, October 12, 2024 2:38 PM  
To: CDD Info <cddinfo@TorranceCA.gov>  
Subject: Overcrowding is a concern

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Hello – I'm writing about the scope of the project at Carson and Prairie. I realize we have a need for more affordable housing in the city, but the size and scope of this project seems a bit overkill for the location, no? I'm very concerned about our infrastructure. Anza was destroyed with all the traffic from all the apartments and it took forever to fix. It was one of the worst roads to drive on in the city. Any chance the size of the project could be scaled down? If noise and infrastructure concerns are not enough to pause the project, I'm not sure what would be.

Please reconsider the size and scope of this project as it will affect the landscape and feel of our very special town.

Concerned homeowner,

West Torrance

Erika Jerez

Sent from my iPhone

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**From:** CDD Info <cddinfo@TorranceCA.gov>  
**Sent:** Monday, October 14, 2024 8:36 AM  
**To:** Niemeyer, Natalie  
**Cc:** Oorts, Leo  
**Subject:** FW: Housing project on Madrona Avenue

CDD INFO  
Community Development  
Email: cddinfo@TorranceCA.gov

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-----Original Message-----

From: Jerry Funt [REDACTED]  
Sent: Sunday, October 13, 2024 1:52 PM  
To: CDD Info <cddinfo@TorranceCA.gov>  
Subject: Housing project on Madrona Avenue

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Sent from my iPhone

I live near the Delamo mall there is so much traffic in the area and tons of crime at the mall.I think it's a terrible place to build housing .

Every day we hear police siren's running to the mall.Plus you will devalue our property if you overcrowd this area Thank You Jerome Funt

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**From:** CDD Info <cddinfo@TorranceCA.gov>  
**Sent:** Monday, October 14, 2024 8:37 AM  
**To:** Niemeyer, Natalie  
**Cc:** Oorts, Leo  
**Subject:** FW: PLEASE STOP BUILDING APARTMENTS-CONDOMINIUMS

## CDD INFO

Community Development Department  
cddinfo@TorranceCA.gov

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**From:** Sandra Will [REDACTED]  
**Sent:** Sunday, October 13, 2024 2:56 PM  
**To:** CDD Info <cddinfo@TorranceCA.gov>  
**Subject:** PLEASE STOP BUILDING APARTMENTS-CONDOMINIUMS

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Dear Sir/Madam:

We are residents of Torrance and have lived here for more than 35 years, we are tired of so much Pollution from the vehicles and overcrowding housing projects that is about to happen, again. They have already added a lot of buildings thru the years, one of the latest that we know of is the one by PCH and Palos Verdes Blvd. and the traffic is getting ridiculous. Now the new development that is about to happens is by Del Amo Mall where our beloved Black Angus is going to be destroyed. Please STOP this project.

Best thing the city should offer are buses that can run every 20 minutes around the City, so people can at least use the bus and no need to use their cars. We don't have enough buses and they don't run as often. Thank you for your time.  
Yours,

Sandra Will

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**From:** CDD Info <cddinfo@TorranceCA.gov>  
**Sent:** Monday, October 14, 2024 8:37 AM  
**To:** Niemeyer, Natalie  
**Cc:** Oorts, Leo  
**Subject:** FW: Public Comment: Fashion Square at Del Amo

**CDD INFO**

Community Development Department  
cddinfo@TorranceCA.gov

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**From:** Lisa Maguire [REDACTED]  
**Sent:** Sunday, October 13, 2024 6:19 PM  
**To:** CDD Info <cddinfo@TorranceCA.gov>  
**Subject:** Public Comment: Fashion Square at Del Amo

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**Subject:** Public Comment – Fashion Square at Del Amo

**Project:** Fashion Square at Del Amo (EAS23-00003, CUP23-00012, DIV23-00003, DVP23-00002, MOD23-00007, MOD23-00008)

**Project Location:** Northwest corner of West Carson Street and Madrona Avenue at 3405 West Carson Street and 21405, 21515 Madrona Avenue (APNs: 7366-019-123, 7366-019-182, and 7366-019-183) Torrance, CA 90503

**Regarding:** Public Comment regarding the Adequacy of the IS/MND for Fashion Square at Del Amo Project

To the City of Torrance Community Development Department, Planning Division:

I am submitting my comments regarding the adequacy of the Initial Study/Mitigated Negative Declaration (IS/MND) for the Fashion Square at Del Amo Project. While I understand that the project site has a land use designation of Commercial Center and is located within the Del Amo Business Sub-District One (H-DA1), I have several concerns regarding the environmental impacts and how they have been addressed in the IS/MND. My comments pertain to the following areas:

**1. Incompatibility with Surrounding Land Uses (Land Use and Planning)**



The IS/MND notes that the project is adjacent to single-family residential neighborhoods across Madrona Avenue. However, it inadequately assesses the project's impact on the character and livability of these neighborhoods. The introduction of 260 residential units, with buildings up to 67 feet in height, will significantly alter the aesthetic and spatial relationship between the commercial center and the surrounding lower-density residential area. The assessment does not fully explore the potential incompatibilities in terms of height, density, and the urbanization of an area primarily characterized by single-family homes. While the IS/MND mentions conformance with zoning standards, it does not address potential cumulative effects on the residential neighborhood's character, privacy, and overall quality of life.

## **2. Traffic and Transportation Impacts**

The IS/MND briefly discusses transportation impacts but does not adequately address the potential for increased traffic congestion in the adjacent single-family neighborhood, particularly on Madrona Avenue. The project's scale and density, combined with the two proposed driveways and increased vehicular access, will introduce more traffic to local streets that serve residential areas. While the study mentions compliance with the City's traffic standards, it fails to provide a detailed analysis of how this traffic increase will affect local streets, pedestrian safety (especially with nearby schools such as Madrona Middle School and Hickory Tree School), and the overall livability of the area. The IS/MND needs a more comprehensive transportation impact study that considers traffic flow into these residential areas.

## **3. Aesthetic and Visual Impacts**

The proposed buildings, particularly the 67-foot-high structures, will have a significant visual impact on the surrounding neighborhood. The IS/MND does not adequately address the potential for the project to obstruct views, cast shadows, or otherwise diminish the aesthetic quality of the single-family neighborhood. Furthermore, the IS/MND mentions that the project will comply with the zoning height limitations, but it does not thoroughly assess how the proposed height, massing, and architectural style will affect the views from nearby homes and public spaces, nor does it propose meaningful mitigation measures to minimize these impacts.

## **4. Noise Impacts**

While the IS/MND mentions compliance with noise standards during construction and operation, the document does not fully assess the noise impacts on the single-family homes adjacent to the project. The construction of 260 residential units, including the associated parking and community amenities, will inevitably generate significant noise during the long construction period (41 months). Furthermore, the operational noise from increased vehicular traffic, residents, and activities in community spaces will create an ongoing disturbance to the neighborhood, particularly at night. These potential noise impacts have not been adequately mitigated in the IS/MND, and further analysis is needed.

## **5. Hydrology and Water Quality**

The IS/MND acknowledges the need to assess hydrology and water quality impacts, but it does not sufficiently address how the large-scale development will affect water drainage patterns, especially considering the proximity of existing residential homes. The development of impervious surfaces across such a large area could increase stormwater runoff, potentially impacting the local neighborhood's drainage systems. Further clarification is required on how stormwater will be managed, especially during heavy rainfall, and whether local infrastructure can handle the increased demand.

## **6. Conditional Use Permit (CUP) Process and Public Input**

The project requires a Conditional Use Permit (CUP) to allow residential uses in the H-DA1 zone, yet the IS/MND does not clearly articulate how the community's input will be integrated into the CUP process. The existing neighborhood has a right to weigh in on how this major development will affect the area's residential nature, and more transparency is needed regarding how the CUP will address these concerns. The IS/MND should outline specific measures for ongoing public consultation and mitigation strategies that prioritize the neighborhood's existing character.

## **Conclusion**

In conclusion, the IS/MND for the Fashion Square at Del Amo Project fails to adequately address several critical environmental and community impacts. The scale, density, and height of the proposed development, combined with potential increases in traffic, noise, and aesthetic degradation, raise significant concerns about the compatibility of this project with the surrounding single-family neighborhood. I urge the City to reconsider the adequacy of the IS/MND and conduct further studies to fully assess the project's impacts, particularly concerning its effect on the residential areas adjacent to the site.

Sincerely,

Resident of the surrounding single-family neighborhood of Torrance

## Jazmine Estores

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**From:** CDD Info <cddinfo@TorranceCA.gov>  
**Sent:** Tuesday, October 15, 2024 8:50 AM  
**To:** Oorts, Leo; Martinez, Oscar  
**Cc:** Ramirez, Michelle  
**Subject:** FW: Public Comment-Fashion Square at Del Amo

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**From:** [REDACTED]  
**Sent:** Tuesday, October 15, 2024 8:38 AM  
**To:** CDD Info <cddinfo@TorranceCA.gov>  
**Subject:** Public Comment-Fashion Square at Del Amo

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**Subject:** Public Comment – Fashion Square at Del Amo

**Project:** Fashion Square at Del Amo (EAS23-00003, CUP23-00012, DIV23-00003, DVP23-00002, MOD23-00007, MOD23-00008)

**Project Location:** Northwest corner of West Carson Street and Madrona Avenue at 3405 West Carson Street and 21405, 21515 Madrona Avenue (APNs: 7366-019-123, 7366-019-182, and 7366-019-183) Torrance, CA 90503

**Regarding:** Public Comment regarding the Adequacy of the IS/MND for Fashion Square at Del Amo Project

To the City of Torrance Community Development Department, Planning Division:

As a lifelong resident of Torrance, having lived in this community for over 75 years, I have seen many changes in our city, some for the better and some that have posed challenges to the character of our neighborhoods. I am writing to express my concerns regarding the adequacy of the Initial Study/Mitigated Negative Declaration (IS/MND) for the Fashion Square at Del Amo Project, which proposes a large-scale residential development near an established, single-family residential neighborhood.

The long-standing character of Torrance's neighborhoods, particularly in the area surrounding Madrona Avenue and West Carson Street, is important to protect, and I am deeply concerned that the proposed project has not been adequately reviewed in terms of its potential impacts on this community. Below are my specific concerns related to the IS/MND:

### 1. Impact on Community Character

The IS/MND fails to fully recognize the potential impacts that the proposed project will have on the longstanding single-family residential neighborhoods. Torrance has been known for its quiet, family-friendly atmosphere, where homes and streets have maintained a sense of peace and continuity. The proposed introduction of 260 residential condominium units, with buildings up to 67 feet in height, would disrupt the scale and character of the surrounding single-family homes. The IS/MND does not sufficiently consider how this drastic shift in density, building height, and population will affect the

neighborhood. The document needs to go beyond zoning and consider the real-world impacts on the community.

## **2. Traffic and Safety Concerns**

In my many years of living in Torrance, I have seen traffic worsen over time, particularly with the expansion of commercial developments. The IS/MND does not adequately account for the likely increase in traffic from an additional 260 residential units, especially on Madrona Avenue, which serves as a major thoroughfare for local residents and nearby schools. The IS/MND's traffic impact assessment does not fully address how this influx of new vehicles will impact the safety of pedestrians, including children attending Madrona Middle School and Hickory Tree School, both of which are located near the project site.

Increased traffic near these schools will create significant safety risks, and this issue has not been properly mitigated in the current IS/MND. The document also does not thoroughly explore the impact of additional traffic on emergency response times, which are critical to maintaining public safety.

## **3. Inadequate Consideration of Noise and Pollution**

The introduction of such a large development will inevitably bring increased noise and air pollution to the surrounding residential areas. Torrance has long been a relatively quiet place to live, but with the constant noise of construction expected to last for 41 months, and the subsequent noise from increased traffic and residents, the quality of life for current homeowners will be severely impacted.

The IS/MND's noise analysis downplays the long-term effects of construction and operational noise on nearby homes. Moreover, the increase in vehicles and residents will contribute to poor air quality, which has not been sufficiently addressed or mitigated in the document. The cumulative effect of these factors could significantly degrade the living conditions in the adjacent single-family neighborhoods.

## **4. Environmental and Aesthetic Impact**

Torrance has historically placed great value on maintaining its aesthetic charm and environmental quality. The IS/MND does not sufficiently address the aesthetic impact of constructing large, multi-story buildings so close to a neighborhood of single-family homes. The towering structures will change the skyline, block natural light, and reduce privacy for existing homes.

The IS/MND's discussion of landscaping and architectural design does not mitigate these concerns, nor does it address the potential environmental impacts of increased stormwater runoff from the large impervious surface area. Given the recent changes in weather patterns, it is crucial that the City ensure proper safeguards are in place to prevent hydrological issues, which the IS/MND does not fully address.

## **5. Conditional Use Permit (CUP) and Community Input**

As a Torrance resident who has been involved in the community for many decades, I believe that the issuance of a Conditional Use Permit (CUP) should be carefully scrutinized. The IS/MND acknowledges that residential uses within the H-DA1 zone are subject to a CUP, but it fails to thoroughly engage the community or seek meaningful input from residents who will be most affected

by this development. More efforts must be made to involve local homeowners in this decision-making process, ensuring that their concerns are not overlooked.

## **Conclusion**

As a resident of Torrance for over 75 years, I have a deep connection to this community and its future. While development is inevitable, it is critical that new projects are compatible with the existing character of our neighborhoods and do not degrade the quality of life for those who have lived here for generations. The current IS/MND does not adequately address the significant concerns related to community character, traffic, noise, environmental impact, and public safety. I urge the City of Torrance to reconsider the adequacy of this document and require a more comprehensive study that fully accounts for the potential long-term impacts on the surrounding residential areas.

Thank you for your time and consideration.

Sincerely,  
Resident of Torrance for Over 75 Years

## Jazmine Estores

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**From:** CDD Info <cddinfo@TorranceCA.gov>  
**Sent:** Tuesday, October 15, 2024 2:51 PM  
**To:** Oorts, Leo; Martinez, Oscar  
**Subject:** FW: Lennar Corporation project

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**From:** Kara Ryan [REDACTED]  
**Sent:** Tuesday, October 15, 2024 2:27 PM  
**To:** CDD Info <cddinfo@TorranceCA.gov>  
**Subject:** Lennar Corporation project

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**Urgent: Request to Halt Lenar Building Apartment Expansion at Del Amo Mall**

To Whom it May Concern,

I am writing to express my concerns about the proposed apartment expansion by Lenar at Del Amo Mall and to request that the project be reconsidered.

The Del Amo Mall area is already facing significant congestion, and this expansion would only exacerbate the existing traffic, parking, and infrastructure challenges. Adding a large number of new residential units without a comprehensive plan to address these issues could overwhelm local resources, strain public services, and diminish the quality of life for both current and future residents.

Furthermore, the neighbors directly across, myself include, will be particularly impacted by the increased noise, traffic, and overcrowding. Our daily lives will be disrupted by the construction process and the long-term consequences of additional residents in an already busy area.

I also believe that a thorough environmental impact study should be conducted to assess how the expansion will affect the surrounding community. Additionally, it's essential to consider the feedback and concerns of local residents and business owners who will be directly affected by this development.

I urge you to carefully reconsider this expansion and prioritize a solution that benefits the broader community without compromising the livability of the area.

Thank you for your time and attention to this matter. I look forward to hearing your thoughts on this issue.

Kara Ryan

Torrance resident for 55 years

## Jazmine Estores

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**From:** CDD Info <cddinfo@TorranceCA.gov>  
**Sent:** Wednesday, October 16, 2024 1:59 PM  
**To:** Niemeyer, Natalie  
**Cc:** Oorts, Leo  
**Subject:** FW: PUBLIC COMMENT

### CDD INFO

Community Development Department  
cddinfo@TorranceCA.gov

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**From:** Soul Of America [REDACTED]  
**Sent:** Wednesday, October 16, 2024 1:52 PM  
**To:** CDD Info <cddinfo@TorranceCA.gov>  
**Subject:** PUBLIC COMMENT

You don't often get email from [REDACTED]. [Learn why this is important](#)

I support the Carson Del Amo Development project with one caveat. Limit it to 4 stories.  
-Thomas Dorsey  
West Torrance resident

## Jazmine Estores

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**From:** CDD Info <cddinfo@TorranceCA.gov>  
**Sent:** Thursday, October 17, 2024 9:01 AM  
**To:** Niemeyer, Natalie  
**Cc:** Oorts, Leo  
**Subject:** FW: Housing Development at Carson and Madrona Ave

### CDD INFO

Community Development Department  
cddinfo@TorranceCA.gov

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**From:** Teri Evans [REDACTED]  
**Sent:** Thursday, October 17, 2024 8:35 AM  
**To:** CDD Info <cddinfo@TorranceCA.gov>  
**Subject:** Housing Development at Carson and Madrona Ave

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Please stop this development. Torrance has become an overdeveloped and overdriven city over a very short time. This development of over 200 apartments will make traffic even more congested and our little streets cannot take anymore. I urge you to find a way to cancel the development of these apartments.

Thank you,  
Teresa Evans  
Torrance Resident





**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

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Katherine M. Butler, MPH, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200  
<https://dtsc.ca.gov>



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

October 16, 2024

Leo Oorts  
Planning Manager  
City of Torrance  
3031 Torrance Boulevard  
Torrance, CA 90503  
[loorts@torranceca.gov](mailto:loorts@torranceca.gov)

RE: MITIGATED NEGATIVE DECLARATION FOR THE FASHION SQUARE AT DEL AMO PROJECT, DATED OCTOBER 9, 2024 STATE CLEARINGHOUSE NUMBER:  
[2024100400](#)

Dear Leo Oorts,

The Department of Toxic Substances Control (DTSC) has reviewed the Mitigated Negative Declaration (MND) for the Fashion Square at Del Amo Project (Project). The proposed project would include the construction of a residential development of approximately 260 residential condominium units and associated community amenities on a 16.37-acre site at the northwest corner of West Carson Street and Madrona Avenue in the City of Torrance. The Project site is currently developed with two structures and is located adjacent to the Del Amo Fashion Center. The proposed Project would require several authorizations from the City of Torrance, including a Conditional Use Permit, to allow the proposed residential uses as a mixed-use project. In June 2024, a Phase I Environmental Site Assessment (ESA) was prepared for the Project by Haley & Aldrich, Inc. The ESA identified the presence of hazardous waste and past petroleum production in, on, or at the subject property due to a release to the

environment that also pose a material threat of a future release to the environment. Historical records indicate a 500-gallon waste oil underground storage tank (UST) was located at the former Montgomery Ward Auto Express in 1971. A large resurfaced concrete patch located west of the building was visible during the site visit indicating the feature was likely removed. Conditions of the tank and analytical results of the excavation samples at the time of removals are unknown. Los Angeles County Fire Department (LACoFD) records indicate an above ground storage tank (AST) containing waste oil was located on the northern exterior of the former Montgomery Ward Auto Express. DTSC recommends the City of Torrance adhere to the following:

1. A Soil Management Plan (SMP) not be implemented as a primary cleanup plan as stated in the Environmental Site Assessment, "Following building demolition and during Site excavation and grading, any impacted soil that may be present could be identified and addressed via procedures outlined in a soil management plan." DTSC recommends that any potential contamination be fully characterized and then remediated under the oversight of a [self-certified local agency](#), DTSC or Regional Water Quality Control Board. A SMP alone cannot sufficiently identify and document the potential contaminants that may pose a threat to human health and the environment. DTSC recommends that a cleanup plan, a Removal Action Workplan (RAW) or Remedial Action Plan (RAP), be prepared to adequately address all site impacts after complete characterization.
2. The City of Torrance enter into a voluntary agreement to address contamination at brownfields and other types of properties or receive oversight from a [self-certified local agency](#), DTSC or Regional Water Quality Control Board. If entering into one of DTSC's voluntary agreements, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: [Request for Agency Oversight Application](#). Submittal of the online application includes an agreement to pay costs incurred during agreement

preparation. If you have any questions about the application portal, please contact your [Regional Brownfield Coordinator](#).

3. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC appreciates the opportunity to review and comment on the MND for Fashion Square at Del Amo Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or concerns, please contact me or a member of our [CEQA Unit Team](#).

Sincerely,



Dave Kereazis  
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CEQA Unit-Permitting/HWMP  
Department of Toxic Substances Control  
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Leo Oorts  
October 16, 2024  
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cc: (via email)

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