

In compliance with the Americans with Disabilities Act (ADA), if special assistance is needed to participate in the meeting, please contact the City Clerk's Office at (310) 618-2780. Notification given 48 hours prior to the meeting will enable the City Clerk's Office to make reasonable arrangements to ensure accessibility to the meeting. [28CFR35.102-35.104 ADA Title II]

The Planning Commission serves as an advisor to the City Council and conducts public hearings on matters related to land use and development. Meetings are held monthly on the first and/or third Wednesday at 6:30pm. A limited number of meeting agenda copies will be made available during the Planning Commission meeting. Minutes are available after they are approved by the Planning Commission. Questions may be directed to the Planning Division at (310) 618-5990.

Members of the public may provide comments related to any items on the meeting agenda. Oral comments are limited to two minutes per speaker for items on the agenda and limited to one minute per speaker for items not on the agenda. Everyone interested in speaking on an agenda item will be heard at the meeting. Speakers are asked to come forward to the podium, speak clearly, and provide their name and address for the record. Meetings are audio recorded. Language translation services are not available. If presenting handout material to the Planning Commission, please submit 15 color copies no later than 5:00pm on Tuesday the day before the meeting.

Written comments may be submitted via email to PlanningCommission@TorranceCA.Gov. Comments must include in the subject line "Public Comment" and the record number and project address. Comments must be pertinent to the agenda item and must not include personal remarks. All personal signatures, personal addresses, personal telephone numbers and personal email addresses must be omitted or will be redacted. Repetitive comments and/or duplicate copies of petitions and flyers are neither necessary nor helpful.

Comments that are submitted no later than 5:00pm on Tuesday, the day before the Planning Commission meeting will be included as a supplemental agenda item and will be posted on the City of Torrance webpage. A copy of the supplemental agenda item will be available at the back of the meeting room. Comments that are submitted in writing after 5:00pm on Tuesday, the day before the Planning Commission meeting will be filed with the public record.

**TORRANCE PLANNING COMMISSION AGENDA
APRIL 16, 2025
REGULAR MEETING
6:30 P.M. IN THE LeROY J. JACKSON COUNCIL CHAMBER
AT 3031 TORRANCE BLVD.**

**PLANNING COMMISSION MAY TAKE ACTION ON ANY ITEM
LISTED ON THE AGENDA**

1. CALL MEETING TO ORDER

ROLL CALL: Commissioners Anunson, Borgialli, Obejas, Riggs, Turner, Yeh, and Chair Kartsonis

2. FLAG SALUTE: Commissioner Yeh

3. REPORT OF STAFF ON THE POSTING OF THE AGENDA

The agenda was posted on the Public Notice Board at 3031 Torrance Boulevard and on the City of Torrance webpage on Friday, April 11, 2025.

4. ANNOUNCEMENT OF WITHDRAWN, POSTPONED, AND/OR SUPPLEMENTAL ITEMS

5. ORAL COMMUNICATIONS

This portion of the meeting is limited up to a 15-minute period and is reserved for public comments on items listed on the Consent Calendar or that are not listed on the agenda. Under the Ralph M. Brown Act, the Planning Commission cannot act on items raised during public comment but may respond briefly to statements made or questions posed; request clarification; or refer the item to staff. Those members of the public wishing to speak are asked to come forward to the microphone and state their name for the record. All speakers are limited to 1 minute per speaker. If presenting handout material to Commission, please provide 15 color copies to staff before speaking.

6. CONSENT CALENDAR

Items listed under the Consent Calendar are considered routine and will be enacted by one motion and one vote. There will be no separate discussion of these items. If discussion is desired, that item will be removed by a Commissioner from the Consent Calendar and considered separately.

6A. Approval of Minutes: None

7. ADMINISTRATIVE MATTERS

8. HEARINGS

8A. Community Development – Conduct a Public Hearing to Consider Approval of CUP25-00001: LINDSEY TOFT – NICK’S COMMUNITY (JAS MADISON I, LLC C/O CORE REALTY HOLDINGS)

Recommendation of the Community Development Director that Planning Commission conduct a public hearing for approval of a Conditional Use Permit to allow the operation of an adult day care program and vocational school at an existing building on property located in the C-3 Zone at 3525 Pacific Coast Highway, Suite S (APN 7377-006-906). This project is Categorically Exempt from CEQA per Guidelines Section 15301 – Existing Facilities. (Res. No. 25-029)

8B. Community Development – Conduct a Public Hearing to Consider Approval of CUP22-00012, DIV22-00003, EAS22-00003: THE BROOKHOLLOW GROUP (KP TORRANCE COMMERCE CENTER, LLC)

Recommendation of the Community Development Director that Planning Commission conduct a public hearing for consideration of an Environmental Assessment for the adoption of a Mitigated Negative Declaration, and approval of a Conditional Use Permit to allow the construction and operation of a 132,425 square foot warehouse, with approximately 20% cold storage, in conjunction with a Division of Lot to consolidate two existing parcels into one parcel on property located in the M-2 Zone at 2271 – 2341 205th Street (APN’s 7352-018-004 and -066), referred to as the 205th Street Industrial Project. (Res. Nos. 25-030, 25-031, 25-032)

8C. Community Development – Conduct a Public Hearing to Consider Approval of MOD23-00010, MHE23-00050: JWG CONSULTING (SAUNDERS PROPERTY COMPANY)

Recommendation of the Community Development Director that Planning Commission conduct a public hearing and consider approval of a Modification to previously approved Division of Lot (DIV14-00006) to amend an open space easement (Note A), in conjunction with a Minor Hillside Exemption for the construction of ground-mounted solar panels and associated equipment, on property located within the Hillside Overlay in the P-1 Zone at 2550 Pacific Coast Highway. This project is Categorically Exempt from the California Environmental Quality Act (CEQA) per Guidelines Section 15303 – New Construction and Section 15332 – In-Fill Development. (Res. Nos. 23-079, 23-080)

9. RESOLUTIONS

10. COMMISSION ORAL COMMUNICATIONS

11. ADJOURNMENT

Adjournment of Planning Commission meeting to Wednesday, May 7, 2025, at 6:30 p.m. in the LeRoy J. Jackson Council Chamber.

AGENDA ITEM NO. 8A

DATE: April 16, 2025
TO: Planning Commission
FROM: Lee Garcia, Planning Assistant
SUBJECT: 3525 Pacific Coast Highway, Suite S (APN 7377-006-906)
Conditional Use Permit (CUP25-00001)

Consideration of a Conditional Use Permit to allow the operation of an adult day program and vocational school at an existing commercial building on property located in the Soley Commercial District (C-3) Zone at 3525 Pacific Coast Highway, Suite S.

RECOMMENDATION

Recommendation of the Community Development Director that Planning Commission conduct a public hearing and consider adoption of Resolution No. 25-029 for approval of a Conditional Use Permit to allow the operation of an adult day program and vocational school at an existing commercial building on property located in the C-3 Zone at 3525 Pacific Coast Highway, Suite S, and determine a Categorical Exemption for the project in accordance with Guidelines for Implementation of the California Environmental Quality Act (CEQA); Article 19, Section 15301 (Existing Facilities).

EXECUTIVE SUMMARY

The project applicant, Lindsey Toft – Nick’s Community (JAS Madison I, LLC C/O Core Realty Holdings), requests approval by the Planning Commission to allow the operation of an adult day program and vocational school at an existing commercial building on property located in the C-3 Zone at 3525 Pacific Coast Highway, Suite S.

The development standards of the Torrance Municipal Code (TMC) are applicable to the project, and therefore require discretionary review and approval of the following entitlements:

- Conditional Use Permit (CUP) to allow the operation of an adult day program and vocational school.

Staff has thoroughly reviewed the project and determined the project is consistent with the General Commercial land use designation and complies with the objective development standards of the C-3 Zone and does not require further environmental review. The balance of this report provides an overview of the project.

DISCUSSION

Environmental Determination

Minor interior alterations to existing facilities and changes in use are Categorical Exempt by the Guidelines for Implementation of the California Environmental Quality Act; Article 19, Sections 15301 (Existing Facilities).

General Plan Land Use Designation

The project site has a General Plan land use designation of General Commercial (C-GEN), which is intended to permit a wide range of commercial uses that serve both the local and regional community. Permitted uses include shopping centers, professional and medical offices, food and beverage establishments, entertainment facilities, financial institutions, automotive sales, and mixed-use developments. Solely commercial uses are limited to a 0.6 floor area ratio. The proposed is consistent with the General Commercial land use designation.

Zoning Designation and Adjacent Land Uses

The project site is designated as C-3 Zone. Adjacent parcels to the north and to the east share the same zoning designation and are developed as commercial. The adjacent parcels to the south are designated as the Single-Family Residential District (R-1) Zone and are developed as single-family homes. The parcels to the west, across Madison Street, are designated as the Conditional Commercial District (C-5) Zone, and are developed as a commercial shopping center.

NORTH:	C-3	Airport
SOUTH:	R-1	Single Family Residences
EAST:	C-3	Auto Dealership
WEST:	C-5	Retail Shopping Center

Project Site

The project site is located in a retail strip mall on the northeast corner of Pacific Coast Highway and Madison Street. Neighboring tenants include businesses such as a pet food store, fitness studio, and various restaurants. Vehicular access to the site is provided via driveways off Pacific Coast Highway at the southeast corner of the parcel and Madison Street at the northwest corner.

Scope of Work

The project proposes to convert the tenant space at the far west of the commercial building, formerly a bank, into an adult day program and vocational school. The scope of work is limited to interior tenant improvements only; no exterior work to the building nor site modifications are proposed as part of the project.

Floor Plan

The subject space measures 4,700 square feet. The proposed floor layout features a lobby area, two office spaces, three flexible program rooms, computer lab, quiet room, fitness room, break room, employee room, storage area, and two restrooms. Staff notes the tenant improvement plan will be reviewed by the Building & Safety Division at the time of plan check prior to building permit issuance.

Parking Requirements

The applicant is proposing to provide client pick-up and drop off transportation by means of eight on-site vans. Staff is conditioning that the vans shall be parked on-site, stored overnight in the parking area, and properly maintained to the satisfaction of the Community Development Director.

The site is a retail shopping center that includes a medical building; these uses require a total of 423 parking spaces. The proposed adult day school is parked at one space for every 15 clients, one space for every employee, one space for each on-site van and a designated loading/unloading stall. Per the attached project narrative (Attachment 4), based on an operation of 30 clients, 20 employees, and 8 onsite vans, a total of 31 spaces are required. Staff notes that, including the proposed use, a total of 454 spaces would be required, while 506 parking spaces are provided.

Business Operation

The proposed hours of operation for the adult day school are between 7:00 a.m. and 6:30 p.m., Monday through Friday, with employees arriving before the participants' sessions begin. The day will be split into a morning session from 9:00 a.m. to 2:00 p.m., and an afternoon session from 2:30 p.m. to 6:30 p.m. The adult day school will serve approximately thirty participants and have twenty staff members per session. The participants will be on-site 20-30% of the time and spend 70-80% of the day out in the community. The focus of the program is to develop and enhance participant's skills in socializing, adaptive hygiene, resume building, job preparation, volunteer training, vocational training, and life skills that will promote independence, social awareness, and community inclusion.

Site Improvements

Staff conducted a site visit of the property and noted opportunities for improvement: the trash enclosure to the south of the site lacks a National Pollutant Discharge Elimination System (NPDES) compliant roof; the refuse receptacle was not stored properly within the existing enclosure; the parking spaces are not definitively striped; and there are bare planter areas. Staff has included conditions of approval to address these concerns.

CONCLUSION

In the judgment of staff, the proposed project, as conditioned, is compatible with the existing and surrounding uses, and will not adversely impact the orderly and harmonious development of the area, nor will it adversely affect the general welfare of the City. The proposed adult day program and vocational school does not impair the character of the zoning district and will not disrupt the existing businesses onsite, nor the nearby commercial, residential, and light industrial uses in the surrounding area. The proposed project is consistent with the General Commercial land use designation and will positively contribute to the community. For these reasons, staff recommends approval of project, as conditioned.

As of the preparation of this report, no written correspondence has been received pertaining to the project.

FINDINGS OF FACT AND CONDITIONS OF APPROVAL

Staff has prepared draft findings and conditions of approval for consideration by the Planning Commission that are listed in the attached Resolution (Attachment 1).

CODE REQUIREMENTS

Staff has prepared a partial list of requirements from the TMC, California Building Code (CBC), California Fire Code (CFC), et al., that are pertinent to the project (Attachment 3). Not all requirements are provided, and the applicant is strongly advised to contact each individual Department/Division for more information. The requirements are not subject to modification and the Planning Commission cannot waive or alter the requirements.

PUBLIC NOTICE

In accordance with the TMC, notices of the public hearing were made no less than 10 calendar days before the Planning Commission meeting. Notices were also posted at the project site and were mailed on March 27, 2025, to the registered owner of properties located within a 500' radius of the exterior boundaries of the project site. Notices were also published in the local newspaper (The Daily Breeze) and posted on the City of Torrance webpage.

RIGHT OF APPEAL

In accordance with TMC Section 95.1.7, decisions made by the Planning Commission may be appealed to the City Council within 15 calendar days of adoption of the Resolutions. For more information, please contact the City Clerk's Office by telephone at (310) 618-2870 or email at CityClerk@TorranceCA.Gov.

PROJECT PLANS

The project plans and all related documents are readily available for public review at the Permit Center (Planning Counter) located at City Hall, 3031 Torrance Boulevard, Torrance, CA 90503, during normal business hours open 8:00 a.m. to 5:00 p.m., Monday through Thursday, open alternate Fridays. Appointments are available by contacting the Planning Division at (310) 618-5990.

ATTACHMENTS

1. Resolution No. 25-029
2. Location and Zoning Map
3. Code Requirements
4. Project Narrative
5. Project Plans

STAFF CONTACT

Lee Garcia, Planning Assistant
BGarcia@TorranceCA.gov

ITEM 8A
ATTACHMENT 1
RESOLUTION NO. 25-029

PLANNING COMMISSION RESOLUTION NO. 25-029

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF TORRANCE, CALIFORNIA, APPROVING A CONDITIONAL USE PERMIT AS PROVIDED FOR IN DIVISION 9, CHAPTER 5, ARTICLE 1 OF THE TORRANCE MUNICIPAL CODE TO ALLOW THE OPERATION OF AN ADULT DAY PROGRAM AND VOCATIONAL SCHOOL AT AN EXISTING COMMERCIAL BUILDING ON PROPERTY LOCATED IN THE SOLEY COMMERCIAL DISTRICT ZONE AT 3525 PACIFIC COAST HIGHWAY, SUITE S.

CUP25-00001: LINDSEY TOFT – NICK’S COMMUNITY (JAS MADISON I, LLC C/O CORE REALTY HOLDINGS)

WHEREAS, the Planning Commission of the City of Torrance conducted a public hearing on April 16, 2025, to consider an application for a Conditional Use Permit (CUP25-00001) filed by Lindsey Toft – Nick’s Community (JAS Madison I, LLC C/O Core Realty Holdings) to allow the operation of an adult day program and vocational school at an existing commercial building on property located in the Soley Commercial District (C-3) Zone at 3525 Pacific Coast Highway, Suite S; and

WHEREAS, due and legal publication of notice was given to owners of property in the vicinity thereof and due and legal hearings have been held, all in accordance with the provisions of Division 9, Chapter 5, Article 1 of the Torrance Municipal Code (TMC); and

WHEREAS, the Planning Commission of the City of Torrance does hereby find and determine as follows:

- a) That the property under consideration is located at 3525 Pacific Coast Highway, Suite S (APN 7377-006-906);
- b) That the property is described as “THAT POR IN TRA 9340 LOT 1 TR NO 9765” per map recorded in the Office of the Los Angeles County Recorder, State of California;
- c) That in urbanized areas, interior alterations to existing facilities and changes in use are Categorically Exempt by the Guidelines for Implementation of the California Environmental Quality Act (CEQA); Article 19, Section 15301 (Existing Facilities);
- d) That the adult day program and vocational school is conditionally permitted within the C-3 Zone and complies with all of the applicable provisions of this Division, as conditioned;
- e) That the proposed use will not impair the integrity and character of the C-3 Zone because an adult day program and vocational school is compatible with the surrounding commercial, residential, and light industrial uses in the area;
- f) That the subject site is physically suitable for the proposed use because the subject request does not involve exterior modifications to the building or site, and the religious facility and preschool will meet required parking during their peak times of operation;
- g) That the proposed use will be compatible with existing and proposed future land uses within the C-3 Zone and the general area in which the proposed project is to be located because the adult day program and vocational school will be compatible with the other uses permitted within the Zone, and will not conflict with the existing commercial uses onsite;
- h) That the proposed use will encourage and be consistent with the orderly development of the City as provided for in its General Plan, which designates the site as General Commercial, as

the adult day program and vocational school is a consistent use with the General Commercial zone;

- i) That there will be adequate provisions for water, sanitation, and public utilities and services to ensure that the proposed use is not detrimental to the public health and safety;
- j) That there will be adequate provisions for public access to serve the proposed use, because the project shall maintain all existing pedestrian walkways and vehicular access points;
- k) That the location, size, design, and operating characteristics of the proposed use would not be detrimental to the public interest, health, safety, convenience or welfare, or to the property of persons located in the area; and
- l) The proposed project will not produce any or all of the following results:
 - Damage or nuisance from noise, smoke, odor, dust or vibration,
 - Hazard from explosion, contamination or fire,
 - Hazard occasioned by unusual volume or character of traffic or the congregating of large numbers of people or vehicles.

WHEREAS, the Planning Commission by the following roll call votes APPROVED CUP25-00001, subject to conditions:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS

ABSENT: COMMISSIONERS:

RECUSED: COMMISSIONERS:

NOW, THEREFORE, BE IT RESOLVED that CUP25-00001, filed by Lindsey Toft – Nick’s Community (JAS Madison I, LLC C/O Core Realty Holdings) to allow the operation of an adult day program and vocational school at an existing commercial building on property located in the C-3 Zone at 3525 Pacific Coast Highway, Suite S, on file in the Community Development of the city of Torrance, is hereby APPROVED subject to the following conditions:

1. That the use of the subject property for an adult day program and vocational school shall be subject to all conditions imposed in CUP25-00001; and any amendments thereto or modifications thereof as may be approved from time to time pursuant to Section 92.28.1 et seq. of the Torrance Municipal Code on file in the office of the Community Development Director of the City of Torrance; and shall be maintained in conformance with such maps, plans, specifications, drawings, applications or other documents presented by the applicant to the Community Development Department and upon which the Planning Commission relied in granting approval;
2. That if this Conditional Use Permit is not used within one year after granting of the permit, it shall expire and become null and void unless extended by the Community Development Director for an additional period as provided for in section 92.27.1;
3. That a copy of Planning Commission Resolution No. 25-029 shall appear on the building plans associated with the tenant improvements to facilitate coordination and effective implementation of the conditions of approval; (Planning)

4. That the project shall comply with all applicable safety and emergency personnel requirements and regulations; (Planning)
5. That modifications to the approved layout shall be subject to the review of the Community Development Director, and the applicants shall first verify with the Planning Division prior to implementing any modifications; (Planning)
6. That all bare planter areas throughout the subject property shall be replanted and have at least three inches of mulch or groundcover added, to the satisfaction of the Community Development Director; (Planning)
7. That there shall be no outdoor or exterior telephones, newspaper racks/magazine stands, independent speakers/sound system, vending machines, kiosks, storage containers, unattended collection boxes, etc. permitted onsite. Outdoor storage shall be prohibited; (Planning)
8. That no public address speakers, radios, paging, telephone bells, buzzers, or similar signaling devices shall be used in conjunction with the use of the proposed building; (Planning)
9. That the applicant shall repair and restripe the parking lot area adjacent to the site, to the satisfaction of the Community Development Director; (Planning)
10. That the existing trash enclosure to the south of the site shall have a metal barrier roof covering to prevent rainwater intrusion to meet current NPDES requirements. Detailed plans of the trash enclosure shall be submitted to the Community Development Director for approval prior to the issuance of any building permits; (Planning)
11. That all trash and refuse receptacles shall be kept in an enclosure, and maintained to the satisfaction of the Community Development Director. If receptacles do not fit in existing enclosure, a new one shall be constructed in compliance with current development standards, as well as NPDES requirements; (Planning)
12. That all persons associated with the use shall be required to park onsite, including visitors, employees, deliveries, etc.; (Planning)
13. That should parking, traffic, or circulation issues arise, the project shall be reevaluated, and that the applicants shall continue to work with staff on securing a resolution, to the satisfaction of the Community Development Director; (Planning)
14. That before building permit issuance, the applicant shall provide concurrence from the property owner that eight parking spots will be specifically designated for the vans, and one parking spot at the front of the tenant space for the loading/unloading zone; (Planning)
15. That within 30 days of the final public hearing, the applicant shall return the City's "Public Notice" sign and stake (provided there is no appeal) to Planning; (Planning)
16. That the applicants shall control public access through a single point of entry via check-in/check-out system; (Police/Planning)
17. That the applicants shall install surveillance cameras to monitor entry/exits, cash handling areas (as applicable), and offices housing assets/valuables. Security cameras shall be maintained in proper working order at all times, and stored video data shall be made available to Police upon request. Surveillance footage shall be stored for no less than 60 days. Should the applicants elect to share video security feed access with Police,

surveillance system shall be Open Network Video Interface Forum (ONVIF) capable; (Police/Planning)

18. That the business name and address shall be visible from street, and that business hours shall be visible at or near entrance; (Police/Planning)
19. That there shall be non-glare security lighting for parking lot; (Police/Planning)
20. That the applicant shall install rooftop numbers in order to assist law enforcement and other emergency personnel locate the property. The numbers shall be 4' high and 2' wide, spaced 12" apart, be parallel to the street, and be a non-reflective color that contrasts the color of the roof; (Police/Planning)
21. That the existing ADA stalls are to remain as is (which maintains the intent of the code for convenience and safety of ADA stall users) while the placing of the new van loading/unloading zone is to be on the west of the ADA stalls; (Building and Safety)
22. That the applicant shall submit a noise attenuation plan to the satisfaction of the Environmental Division. The consultant shall contact the Environmental Division prior to preparing the noise attenuation plan; (Environmental)
23. That the recommendations of the Noise Study/Noise Consultant shall be adhered to, so that when completed, this use will comply with the Torrance Municipal Code Ordinances and will not disturb neighboring properties; (Environmental)
24. That the site shall provide bicycle rack(s). The applicant shall install onsite bicycle racks and submit placement plan and bicycle rack detail to the satisfaction of Environmental Division; (Environmental)
25. No freestanding or A-frame signs; signs attached to light or utility poles and trees; inflatable signs; air assisted signs; temporary signs attached/mounted to the roof of the building; persons holding signs or twirlers; electronically moveable signs; electronically changing signs; bow/flag/feather banners; or any other temporary signage that violates Torrance Municipal Code requirements for temporary signs. Permits for banners must be obtained before use. Directional signs and parking signage are allowable; (Environmental)
26. That the applicant shall obtain a sign permit for any new areas of signage to be displayed on the façade, the outward walls, on the ground, and that all signs (new, modified or revised) shall conform to the approved sign program and be approved by the Environmental Division with appeal rights to the Planning Commission; (Environmental)
27. That all conditions of all other City departments received prior to or during the consideration of this case by the Planning Commission shall be met.

Introduced, approved and adopted this 16th day of April 2025.

ATTEST:

Secretary, Torrance Planning Commission

Chairman, Torrance Planning Commission

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss
CITY OF TORRANCE)

I, ROBERT GARCIA, Secretary to the Planning Commission of the City of Torrance, California, do hereby certify that the foregoing resolution was duly introduced, approved, and adopted by the Planning Commission of the City of Torrance at a regular meeting of said Commission held on the 16th day of April 2025, by the following roll call vote:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS:

ABSENT: COMMISSIONERS:

RECUSED: COMMISSIONERS:

Secretary, Torrance Planning Commission

ITEM 8A
ATTACHMENT 2

LOCATION AND ZONING MAP



LOCATION AND ZONING MAP

CUP25-00001
 3525 PACIFIC COAST HIGHWAY, SUITE S



LEGEND

- 3525 Pacific Coast Hwy, Suite S
- Notification Area



ITEM 8A
ATTACHMENT 3
CODE REQUIREMENTS

CODE REQUIREMENTS

The following is a partial list of Code requirements applicable to the proposed project. Not all Code requirements are provided and the applicant is strongly advised to contact each individual department for further clarification. The Planning Commission may not waive or alter the Code requirements. They are provided for information purposes only.

PLANNING

1. All trash bins should be stored in an approved enclosure, as described in Division 9 of the Torrance Municipal Code, unless bins are stored in an approved service yard.
2. Trash enclosures should be architecturally compatible with the commercial project with respect to design and materials.
3. Trash enclosures shall be bounded on three (3) sides by walls of material compatible in color, texture and appearance with the main structure and having a gated opening of sufficient width to permit the removal and replacement of standard size commercial trash bins. The gate of said enclosure shall be constructed of solid, opaque material.

BUILDING AND SAFETY

4. Comply with 2022 California Codes and Torrance Ordinances.
5. Provide a 1-hour demising wall between tenants, as the building is non-sprinklered.
6. The architect of record is to establish the correct occupancy group for correspondence requirements.

FIRE

7. Comply with the 2022 California Fire Code.

ENVIRONMENTAL

8. The Van Accessible loading area shall be at least 8 feet wide and the words "NO PARKING" shall be painted on the ground within each loading access aisle in white lettering no less than 12 inches high and located so that it is visible to traffic enforcement officials.
9. Double-line stripe all parking spaces per Torrance code (93.4.6).
10. Screen all roof equipment from public view per Torrance code(92.30.2).

ITEM 8A
ATTACHMENT 4
PROJECT NARRATIVE



Nick's Community is a Community Integration Partial-Work Inclusion Day Program for adults ages 18+ years of age who have exited the school system with developmental disabilities. The Regional Center refers all participants. All individuals have a current Individual Program Plan (IPP). NC seeks volunteer opportunities and paid employment in the community based on the individual's assessments, needs, and preferences as documented through their person-centered plan.

At Nick's Community Day Program, our mission is to provide a safe and inclusive environment that promotes community integration, socialization, and volunteer vocational training. We strive to empower individuals to reach independence in their daily living skills, fostering personal growth and encouraging our participants to pursue their passions. We are committed to creating a community that values diversity and inclusivity, where everyone can contribute and thrive. By providing a range of programs and services, we aim to enhance the lives of our participants, their families, and the broader community.

Our goal is for all participants attending Nick's community to have an individualized program that will include activities both at our location and in the community. Our focus is to develop or enhance participants' skills in socializing, vocational, adaptive hygiene, resume building, job preparation, volunteer training, and life skills training that will promote personal choice, social awareness, and community inclusion.

HOURS OF OPERATION:

AM Session: Monday – Friday, 9:00 am – 2:00 pm

PM Session: Monday – Friday, 2:30 pm – 6:30 pm

We will serve 30 participants in the morning and 30 in the afternoon. We will have approximately 20 staff members at each shift. We also serve as transportation services to and from the program, where we will have 8 vans entering and exiting the premises at the start and end of the program, which will be a drop-off and pick-up service for our participants. Our participants will be on-site 20-30% of the time, and participants spend 70-80% of the day out in the community.

ITEM 8A
ATTACHMENT 5
PROJECT PLANS

AGENDA ITEM NO. 8B

DATE: April 16, 2025
TO: Planning Commission
FROM: Yolanda Gomez, Planning Associate
SUBJECT: 2271 – 2341 205th Street (APNs 7352-018-004 & 7352-018-066)
Initial Study (EAS22-00003)
Conditional Use Permit (CUP22-00012)
Division of Lot (DIV22-00003)

Consideration of an Environmental Assessment for adoption of a Mitigated Negative Declaration and approval of a Conditional Use Permit to allow the construction and operation of a 132,425 square foot warehouse / industrial building, with approximately 20% cold storage, in conjunction with a Division of Lot for consolidation purposes on property located in the Heavy Manufacturing District (M-2 Zone) at 2271 – 2341 205th Street (APNs 7352-018-004 & 7352-018-066)

RECOMMENDATION

Recommendation of the Community Development Director that the Planning Commission conduct a public hearing and consider adoption of Resolution Nos. 25-030, 25-031, and 25-032, for adoption of a Mitigated Negative Declaration(MND) in accordance with the California Environmental Quality Act (CEQA); Article 6, Section 15074, and approval of a Conditional Use Permit (CUP) to allow the construction and operation of a 132,425 square foot warehouse / industrial building, with approximately 20% cold storage, in conjunction with a Division of Lot (DIV) to consolidate two existing parcels into one parcel, on property located in the M-2 Zone at 2271 – 2341 205th Street (APNs 7352-018-004 & 7352-018-066), referred to as the 205th Street Industrial Project.

EXECUTIVE SUMMARY

The project applicant, The Brookhollow Group (KP Torrance Commerce Center, LLC), requests the Planning Commission adopt an MND, and approve a CUP to allow the construction and operation of an 132,425 square foot warehouse / industrial building, with approximately 20% cold storage, in conjunction with a DIV for lot consolidation purposes on property located in the M-2 Zone at 2271 – 2341 205th Street, referred to as the 205th Street Industrial Project.

CEQA requirements, the development standards of the M-2 Zone, the CUP section of the Torrance Municipal Code (TMC) and Subdivision Map Act standards are applicable to this project; and therefore, require discretionary review and adoption/approval of the following entitlements:

- Environmental Assessment/Initial Study (EAS/IS) to adopt a Mitigated Negative Declaration (MND);
- Conditional Use Permit (CUP) to allow new storage/manufacturing facility of 15,000 sq. ft. or larger; and
- Division of Lot (DIV) to allow lot consolidation.

The potential environmental impacts associated with the project were assessed through an Initial Study/Mitigated Negative Declaration (IS/MND), which found there is no substantial evidence that the project would have a significant effect on the environment, when Mitigation Measures (MMs) are incorporated into the project. Staff has reviewed the environmental studies and the EAS/IS provided by the applicant and determined that the project meets the requirements for an MND. Staff has also reviewed the project and determined that it is consistent with the Business Park (I-BP) land use designation; however, the property's current M-2 Zoning is inconsistent with the Business Park designation, which is anticipated to be amended at the time the City updates its Zoning Code and official map. The project, as conditioned, complies with the development standards of the M-2 Zone, as well as, meeting the CUP and DIV findings. Therefore, staff recommends adoption of the MND and approval of the project, as conditioned. The balance of this report provides a detailed overview of the project.

Staff notes the project plans and all related documents are readily available for public review on the City webpage (<https://bit.ly/205th-Street-Industrial-Project>).

DISCUSSION

Environmental Assessment

In accordance with the CEQA, the potential environmental impacts associated with the project were assessed in an IS/MND, referenced as EAS22-00003 that was prepared by Environmental | Planning | Development Solutions, Inc. for the City of Torrance, as the Lead Agency (Attachment 5).

The IS/MND, through its various independent technical studies (i.e., air quality, noise, sewer, traffic), substantiates that the potential environmental impacts associated with the implementation and operation the project would be reduced to less than significant with the incorporation of MMs that are monitored and enforced by a Mitigation Monitoring and Reporting Program (MMRP, Attachment 5).

As provided in the IS Checklist, the project would result in either a determination of no impact or less than significant impact, on the following environmental analysis areas: Aesthetics, Agricultural and Forestry Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use and Planning, Mineral Resources, Population/Housing, Public Services, Recreation, Transportation, Utilities/Service Systems, and Wildfire.

The project would result in less than significant impacts with MMs implemented in the following environmental analysis areas: Air Quality, Biological Resources, Cultural Resources, Geology/Soils, Noise, and Tribal Cultural Resources. As previously stated, the MMs are incorporated in the MMRP.

Notices of the availability of the IS and the proposed MND for review and comment have been filed with the Los Angeles County Recorder's Office (Notice of Intent – NOI) and State Clearinghouse, advertised in the local newspaper (The Daily Breeze), posted at the project site and mailed to property owners within a 500 ft. radius of the project's property lines. Copies of the IS/MND and all project documents incorporated by reference and comments were made available at the City of Torrance Community Development Department, and also available at the Department's Webpage for this project (<https://bit.ly/205th-Street-Industrial-Project>), and posted on the public notice board located at City Hall.

A 31-day public review period was established for the IS, with the proposed MND commencing on May 10, 2024 and ending on June 10, 2024. A review period of 30-days is established in accordance with Section 15073 of the State CEQA Guidelines.

During review of the IS/MND, affected public agencies and the interested public were able to comment on the document's adequacy in identifying and analyzing the potential environmental impacts and the ways in which the potentially significant effects of the project can be avoided or mitigated. Six comment letters (two public agency, four individuals) were received during the public review period (Attachment No. 4). All comments received have been reviewed to determine whether any new substantial environmental issues have been raised that were not previously assessed. Although CEQA does not require a formal response to comments received on the IS/MND, a "Response to Comments" was nonetheless prepared to provide the decision-making body with additional information upon which to base their decision, for letters addressing the project and/or CEQA issues (Attachment No. 5). All potential environmental impacts associated with the project were found to be less than significant with the incorporation of MMs, as monitored and enforced by the MMRP. Therefore, the findings and conclusions of the IS/MND are not affected and recirculation is not required.

Environmental Determination

With the incorporation of MMs identified in the IS, and provided in the MMRP, the project would not degrade the quality of the natural environment and would not result in cumulative impacts in consideration with other projects. According to the IS, the project does not result in environmental effects that would cause substantial effects on human beings either directly or indirectly, with the implementation of existing regulations and standard Conditions of Approval (COA), with no MMs required.

As the decision-making body relative to the proposed development, it is the Planning Commission's role to review the information provided within the IS and determine the extent of potential environmental impacts. If, on the basis of the IS and related public testimony, the Planning Commission finds that there is no substantial evidence that the

project will have a significant effect on the environment, the appropriate action would be to adopt the MND, prior to taking action on the project.

General Plan Land Use Designation

This project site has a General Plan land use designation of I-BP, which allows a maximum Floor Area Ratio of 0.6. The designation allows business park development with single or multiple tenants that incorporate a mixture of business, professional and medical office, research and development, light industrial uses, and compatible commercial uses. Ancillary retail uses are allowed to support these uses. Industrial activities are limited to the interiors of structures. Staff is working on future development standards that are more stringent than for other industrial designations to maximize compatibility with neighboring uses. The maximum Floor Area Ratio (FAR) is 0.6.

A request for a new warehouse building exceeding 15,000 sq. ft., on property in the M-2 zone, is conditionally permitted. This use would be consistent with the types of uses permitted within the I-BP designation. However, the property's current M-2 Zoning is inconsistent with the Business Park designation, which is anticipated to be amended at the time the City updates its Zoning Code and official map.

Zoning Designation and Adjacent Land Uses

The project site is designated as M-2 Zoning and the site is bounded along the east and west and across the street to the south by similar uses that provide either business park occupancies or individual industrial buildings. The north or rear side of the property is occupied by single family residential properties fronting on Del Amo Blvd., which are zoned R-1 (Single Family Residential District), originally built circa 1919 – 1948, and include a public park.

NORTH: R-1 & P-U, Single Family Residential District (one-story SFRs), and Public Use District (Pueblo Park)

SOUTH: M-2, Heavy Manufacturing District (manufacturing, R&D)

EAST: M-2, Heavy Manufacturing District (Torrance Tech Park: manufacturing, R&D)

WEST: M-2, Heavy Manufacturing District (Torrance Business Park: manufacturing, R&D)

Project Site

The property is located within the former American Standard Tract, within a business park setting among established centralized industrial properties, including the Torrance Refinery, and newer developments, such as, Ganahl Lumber, and the Torrance Transit Center. The subject property is located on the north side of 205th St., between Beech and Amapola Avenues. The property is rectangular, except for a slight radius at the southeast corner of the property, where Amapola Ave. meets 205th St. The site consists of two parcels, providing a total of 6.26-acres (272,529 sq. ft.). The current zoning code does not provide a minimum lot size. The site is developed with six buildings totaling approximately 111,981 sq. ft., associated parking, infrastructure, and ornamental vegetation. There are no outstanding natural features on the site. The applicant proposes

to demolish the six buildings and regrade the entire site. The property is currently in operation and well maintained.

Building Setbacks

The TMC does not specify any minimum setbacks in the M-2 Zone. While the setbacks for the proposal were not called out on the plans (Attachment No. 6), staff provides an approximation below, based on scaling. The front setback varies between approximately 13 ft. to 25 ft. from east to west, respectively. The existing development provides front setbacks that vary from approximately 16 ft. to 66 ft. The adjacent property to the west provides a front setback of approximately 70 ft. The properties across the street to the south provide lesser front setbacks of approximately 10 ft. to 20 ft. In staff's judgment, the proposed setbacks are compatible with the existing pattern of development in the vicinity. However, staff notes that the existing Covenants, Conditions, and Restrictions (CC&R's) for the Torrance Business/Industrial Center and the tract, which includes this property, notes a minimum front setback of 40-ft. from curb face to building line. Staff is recommending a COA that the applicant provide verification that the signers of the CC&R's have provided approval of the proposal's lesser front setbacks, prior to Building Permit issuance. The east and west side setbacks are approximately 78.5 ft. and 79.3 ft. respectively, and 87 ft. to 146 ft., at the rear from west to east. The loading dock doors are located approximately 146 ft. to the north property line, adjacent to residential. A 10-ft. landscaped setback will remain along the entire rear property line, as required by Code, for nonresidential properties located adjacent to residential properties.

Building Height

The building provides two levels, a main ground floor, which includes the entire footprint of the structure, and a smaller mezzanine level for office space. It provides a maximum height of 45 ft. at the pedestrian entrances, with the majority of the building at 40 ft., with various ridgelines throughout the front and sides. The TMC notes that maximum building height shall be regulated by the California Building Code (CBC), which is evaluated during the plan check process. While no roof plan was provided, the applicant advised staff that a relatively flat roofline will be provided. Staff notes that while the enlarged (partial) elevations show some parapets, with a height of 5'-6" from roof floor, it also shows that the roof floor/deck slopes, thereby reducing the parapet's height to an unknown dimension. The plan is only a partial section and does not provide the entirety of the parapet's height around the entire building. Staff is recommending a COA that a complete roof plan shall be provided for approval by Planning staff, prior to Building Permit issuance, to assure that the roofline shall be designed to prevent visibility of any future rooftop equipment from the Right-of-Way (ROW).

Building Architecture and Site Design

The elevations specify a contemporary concrete tilt-up building, with widely spaced reveal lines, including horizontal and vertical articulation, metal canopies along the entrances, and trellis canopies along the upper windows. Staff observes that there is a proliferation of this style of architecture used in recent Torrance warehouse construction. The building's color scheme is white, light grey and dark grey. Aluminum windows are provided with blue reflective glass along the front and sides of the building. The majority

of aesthetic interest is visible at each building's pedestrian entrances, highlighted with the noted canopies and blue glazing.

As alluded to in the Building Setbacks section, the building is sited centrally on the property, with a closer setback to the front, and a more generous setback to the rear, to allow for circulation of the trucks to the loading dock area, which is in the rear of the building. Two truck yard gates are proposed to secure the loading dock area and are proposed along the east side of the property, approximately at midpoint. A second yard gate is shown towards the rear, western portion of the truck court, which is supplemented by a concrete fence/wall. While the plan's Keynote #6 states that the height is indicated on the elevations, it is missing. Per staff's calculations, these walls scale to 10-ft. in height, which is not permitted per Code. Therefore, staff is providing a COA that they be reduced to a maximum of 8-ft. Additionally, the east elevation erroneously shows a concrete fence and gate facing eastward. Staff met with the applicant and noted that this portion of the elevation will be corrected to reflect the site plan. Staff is providing a COA that reflects this requirement. Staff is also providing a COA that detailed plans shall be provided for all gates, fences, and freestanding walls, which consist of architecturally compatible materials, with the building's design. The plan also provides two outdoor employee break areas, on the sides of the building.

Building Floor Plan

The proposed warehouse building is shown as a partial two story. The first floor provides a gross area of 127,425 sq. ft., with a warehouse area of 122,425 sq. ft., and a small office on the SW corner (5,000 sq. ft.), with an equal-sized office mezzanine above the first floor's office space. Inclusive of the warehouse space, cold storage usage of up to 20% of the warehouse space (24,485 sq. ft.) is requested, though not shown on the plans (both 22,485 and 26,485 sq. ft. of cold storage are mentioned in the MND). Staff discussed these statistics with the applicant and were advised that the correct maximum cold storage area is 26,485 sq. ft., and it was corrected in the MND Errata. The plans show a future office mezzanine area, of similar size and stacking along the southeast corner of the building. While this future office area was not analyzed in the project's plans or CEQA documents, Staff is not opposed to the additional office area. However, should the applicant propose to implement this future office area, staff would require an Administrative Approval entitlement to be approved at that time, with the provision of the requisite parking, and determination whether additional CEQA review would be required or if the conversion of space would be considered in-fill, and categorically exempt from CEQA review.

Floor Area Ratio

The total building area is 132,425 sq. ft., over a 6.26-acre site (272,529 sq. ft.), providing a FAR of 0.49. The General Plan I-BP Designation provides for a maximum of 0.60 FAR, the M-2 Zoning Code is silent regarding the FAR. As a reference, the existing buildings that will be demolished as part of this project, provided an approximate FAR of 0.32.

A project summary is provided below:

PROJECT SUMMARY		
Parcel Area	272,529	sf
Acres	6.26	
WAREHOUSE SCENARIO		
Warehouse Area 1st Fl.	122,425	sf
Office 1st Fl.	5,000	sf
Office 2nd Fl.	5,000	sf
TOTAL AREA	132,425	sf
Floor Area Ratio	0.49	
Parking Required	122	ps
Parking Provided	195	ps
Parking Surplus	73	ps
MANUFACTURING SCENARIO		
Manufacturing Area 1st Fl.	82,000	sf
Warehouse Area 1st Fl.	40,425	sf
Office 1st Fl.	5,000	sf
Office 2nd Fl.	5,000	sf
TOTAL AREA	132,425	sf
Floor Area Ratio	0.49	
Parking Required	272	ps
Parking Provided	294	ps
Parking Surplus	22	ps

Parking, Circulation and Access

Passenger vehicle parking is located along the west, north and east perimeters of the building, with 27 loading docks along the north side, inclusive of two grade level/drive in loading docks. The plans inadvertently label the number of loading docks as 25 and 26 across several sheets. Staff is providing a COA that the final Building Plans shall provide the correct number of docks across all pertinent sheets. No truck parking is provided; therefore, staff is recommending a COA that the final Building Plans shall incorporate truck parking locations, as needed.

The applicant has provided two parking scenario statistics on the cover sheet of the plans, as requested by Staff that show a minimum and maximum parking demand and supply. The plans reflect their principal request, a warehouse/logistics use that provides 122,425 sq. ft. of warehouse area (inclusive of 20% cold storage), and 10,000 sq. ft. of office area. The parking requirement for this scenario would be 122 stalls, with 195 provided.

The statistics also show a manufacturing use scenario, showing 82,000 sq. ft. for manufacturing purposes, 40,425 sq. ft. for warehouse, and 10,000 sq. ft. for office. This scenario requires 272 parking spaces. As mentioned above, with 195 stalls provided, this

scenario would fall short; however, the site plan shows an option to add 99 parking spaces. They are provisionally provided within the loading dock court, which would provide 294 parking spaces, and surpassing the requirement with the above designated parking. The placement of these conditional stalls would prohibit the use of most of the loading docks, leaving only eight accessible. Staff notes that the plan's statistics show the manufacturing scenario providing 272 vs. 294 stalls and also notes that a minor amount (approximately eight) parking stalls do not meet minimum size requirements, for those stalls located adjacent to walls, which should provide a 10-ft. minimum width. Staff has provided a COA that the final Building Plans shall provide accurate statistics, and that a parking plan shall be provided, prior to Building Permit issuance that will detail the parking layout, to assure compliance. In staff's judgment, should the noted stalls require removal, the project would remain in compliance with the parking code, as both scenarios would have provided a surplus above noted stalls, and would not affect the minimum requirements.

The site currently provides vehicular access via four driveways on 205th St. The project proposes to abandon the two center driveways and enlarge the two outer (westmost and eastmost) existing driveways from 25 ft. to 30 ft. wide. The radius of both driveways is also being increased to 25-ft. to facilitate truck access. City Engineering and Planning staff met with the applicant to discuss circulation, and Engineering staff determined that the proposed driveway widths and radii would be sufficient for the arriving truck size proposed for this site. The Site Plan shows the truck turning illustration at the westmost driveway making the turn by a movement taken from near the center of the two-way street; however, no clipping of the new driveway, planter and/or parked cars in the parking lot near the driveway appears to occur. Additionally, discussion was raised whether one-way truck access should be required; however, Engineering staff determined that restricting access to one-way was not necessary and can permit two-way truck access from both driveways. Traffic levels on this section of 205th St., which is considered a local street, are low in comparison to collector streets or major arterials, such as, Crenshaw or Del Amo Boulevards. No access is proposed from adjacent properties; therefore, no reciprocal cross access easement for ingress and egress is required, nor shown on the Tentative Parcel Map.

Pedestrian access to the site is proposed near the two remaining driveways, which run parallel to the driveways. Building access is facing west and east near the front of the building. Engineering staff is proposing a dedication for a 5-ft. street easement for street purposes for a sidewalk jog along 205th St., to provide pedestrian connectivity along the sidewalk, at the driveways.

Infrastructure

In September 2024, the City Council adopted an Ordinance and amended the TMC to create a Community Facilities District (CFD). The CFD requires the applicant of real property located in a CFD to enter into negotiations for the formation of, participate in, or annex into, a Community Facilities District (CFD) to pay for a portion of the additional costs for ongoing City services. Staff has included a recommended COA addressing this requirement to be completed, prior to the issuance of a Building Permit. With the

proliferation of warehouse, logistics, freight forwarding developments in Torrance, for the last several years, staff from the City Manager's Office, City Attorney's Office, Finance, and Community Development Departments have worked toward developing a CFD, as the existing Development Impact Fees collected from all new projects has not fully addressed the wear of the City's street infrastructure in high and heavy weight truck trips associated with these types of uses.

Division of Lot/Mapping Action

The proposed area includes two parcels. As the proposed building will cross the property line, Engineering staff requires a mapping action to combine the two parcels. A DIV was requested, which provides a Tentative Parcel Map No. 83866 (Attachment No. 6), which will consolidate the property from four lots into one lot/parcel.

Landscaping

The plans specify that over 38,000 sq. ft. or 14% of the site will be landscaped. TMC provides that a minimum of 5% of the parking lot shall be landscaped, which as proposed would exceed this minimum. The site plan shows planters lining most of the building's elevations, except for the loading dock areas to allow for truck access. The frontage and perimeter of the property is also lined with planters. Staff is recommending a COA that the applicant shall apply for a Landscape Plan Review (LPR), prior to Building Permit issuance, and that the statistics shall include the total landscaping area for the parking lot area vs. the site area, and that a complete landscaping plan, verifying that the planters and their locations meet the minimum sizing requirements to qualify towards the overall landscaping percentage. Staff notes that Code requires that any unused areas resulting from the design of the parking lot shall be used for additional landscaping, such as, areas surrounding the trash enclosure. Staff will be reviewing the final landscaping plan to make sure it meets this Code requirement. City Engineering staff has requested that the existing trees that line the rear/north property line remain in place, to prevent damage to the existing storm drain infrastructure, and a COA has been provided to address this request.

CONCLUSION

The City's General Plan specifies and directs Staff to assure that new development does not overwhelm the City's infrastructure and that they provide their full fair share of the improvements necessary to mitigate project-generated impacts on circulation and infrastructure systems. Staff acknowledges that the scarcity and high cost of land contributes to the desire to intensify existing properties to take full advantage of a property's economic potential. However, Staff is obligated to balance land use recycling with uses that contribute to higher retail tax revenue for the City while mitigating traffic and parking implications. The General Plan also provides objectives and goals that recognize the importance of retaining a strong industrial base to meet revenue and employment needs. Potential impacts created by interim non-manufacturing uses, such as, logistics, should be adequately mitigated, and the ability to convert a building or tenant space for an industrial use should be considered when permitting a non-industrial use/tenant. The General Plan notes that Staff must guide development in industrial districts, ensuring the appropriate tenants in industrial developments can minimize safety

and traffic conflicts and ensure that these areas are preserved for industrial businesses that contribute positively to the City's economy through jobs creation and tax revenue. Lastly, the General Plan notes that the City should focus on retention and expansion efforts on industries that provide high-quality jobs, such as those found in manufacturing industries.

The City's General Plan and Strategic Plan note the importance of the social and economic welfare of the community, which includes the importance of promoting viable industrial development. The potential environmental impacts associated with the construction of the project have been assessed in an IS, which concluded that with the implementation of MMs, impacts are considered less than significant. Therefore, Staff recommends that the Planning Commission adopt the MND and recommends approval of the subject request, as conditioned.

FINDINGS OF FACT AND CONDITIONS OF APPROVAL

Staff has prepared draft findings and COA for consideration by the Planning Commission that are listed in the attached Resolutions (Attachment No. 1).

CODE REQUIREMENTS

Staff has prepared a partial list of requirements from the TMC, CBC, California Fire Code (CFC), et al., that are pertinent to the project (Attachment No. 3). Not all requirements are provided, and the applicant is strongly advised to contact each individual Department/Division for more information. The requirements are not subject to modification and the Planning Commission cannot waive or alter the Code requirements.

PUBLIC NOTICE

In accordance with the TMC, notices of the public hearing were made no less than 10 calendar days before the Planning Commission meeting. Notices were posted at the project site, and were mailed on March 27, 2025, to the registered owner of properties located within a 500' radius of the exterior boundaries of the project site. Notices were also published in the local newspaper (The Daily Breeze) and posted on the City of Torrance webpage.

RIGHT OF APPEAL

In accordance with TMC Section 95.1.7, decisions made by the Planning Commission may be appealed to the city Council within 15 calendar days of adoption of the Resolutions. For more information, please contact the City Clerk's Office by telephone at (310) 618.2870 or email at CityClerk@TorranceCA.Gov.

PROJECT PLANS

The project plans and all related documents are readily available for public review at the Permit Center (Planning Counter) located at City Hall, 3031 Torrance Blvd., Torrance, CA 90503, during normal business hours, 8:00am to 5:00pm, Monday through Thursday, open alternate Fridays. Appointments are available by contacting the Planning Division at (310) 618-5990.

ATTACHMENTS

1. Proposed Planning Commission Resolutions (25-030, 25-031, 25-032)
2. Location and Zoning Map
3. Partial List of Code Requirements
4. Correspondence
5. Initial Study/Mitigated Negative Declaration (Limited Distribution)
6. Mitigation Monitoring and Report Program
7. Response to Comments of MND
8. Revised Plans (Limited Distribution)

STAFF CONTACT

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ITEM 8B
ATTACHMENT 1

Proposed Planning Commission Resolutions (25-030, 25-031, 25-032)

PLANNING COMMISSION RESOLUTION NO. 25-030

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF TORRANCE, CALIFORNIA, ADOPTING A MITIGATED NEGATIVE DECLARATION AND APPROVING A CONDITIONAL USE PERMIT AS PROVIDED FOR IN DIVISION 9, CHAPTER 5, ARTICLE 1 OF THE TORRANCE MUNICIPAL CODE TO ALLOW THE CONSTRUCTION OF A 132,425 SQUARE FOOT WAREHOUSE/INDUSTRIAL BUILDING, WITH APPROXIMATELY 20% COLD STORAGE, IN CONJUNCTION WITH A DIVISION OF LOT FOR CONSOLIDATION PURPOSES ON PROPERTY LOCATED IN THE M-2 ZONE AT 2271 - 2341 205TH STREET.

**CUP22-00012: THE BROOKHOLLOW GROUP
(KP TORRANCE COMMERCE CENTER, LLC)**

WHEREAS, the Planning Commission of the City of Torrance at its meeting of April 16, 2025, conducted a duly noticed public hearing to consider the adoption of a Mitigated Negative Declaration in accordance with the California Environmental Quality Act (CEQA) and an application filed by The Brookhollow Group (KP Torrance Commerce Center, LLC), for approval of a Conditional Use Permit (CUP22-00012) to allow the construction of a 132,425 sq. ft. warehouse/industrial building, with approximately 20% cold storage, in conjunction with a Division of Lot for consolidation purposes on property located in the Heavy Manufacturing District (M-2) zone at 2271 - 2341 205th Street, referred to as the 205th Street Industrial Project; and

WHEREAS, due and legal publication of notice was given to owners of property in the vicinity thereof and due and legal hearings have been held, all in accordance with the provisions of Division 9, Chapter 5, Article 1 of the Torrance Municipal Code (TMC); and

WHEREAS, pursuant to CEQA Guidelines Section 15367, the City of Torrance is the lead agency for the project; and

WHEREAS, the environmental impacts of the construction and operation of the proposed project were analyzed in an Environmental Assessment (EAS22-00003); and

WHEREAS, EAS22-00003 has been prepared pursuant to CEQA, as amended (*Public Resources Code* §21000 et seq.) and in accordance with the State CEQA Guidelines (*California Code of Regulations*, Title 14, §15000 et seq.); and

WHEREAS, said EAS22-00003 was filed with the Los Angeles County Clerk (#2024050384) and circulated for Public Review between May 10, 2024 and June 10, 2024; and

WHEREAS, based on all the evidence found and public testimony considered, the Planning Commission of the City of Torrance has carefully read and considered EAS22-

00003, and have determined that the document reflects the City's independent judgment and has been prepared in accordance with CEQA, and by roll call vote approved a motion to adopt a Mitigated Negative Declaration (MND) for the 205th Street Industrial Project; and

WHEREAS, the Planning Commission of the City of Torrance does hereby find and determine as follows:

- a) That the property is located at 2271 – 2341 205th Street;
- b) That the property is further described as Lots 4, 5, 6 and 7 of Tract 39796, APN 7352-018-004 and 7352-018-066;
- c) That the proposed project, as conditioned, will not be detrimental to the public interest, health, safety, convenience or welfare, as the environmental impacts associated with the project have been assessed through an Initial Study/Mitigated Negative Declaration in accordance with the CEQA. The project would not have a significant effect on the environment when mitigation measures are incorporated and therefore a MND was adopted;
- d) That the proposed new construction of a 132,425 sq. ft. warehouse/industrial building with approximately 20% cold storage is conditionally permitted within the M-2 zone, and complies with all of the applicable provisions of this Division, as conditioned;
- e) That the proposed project, as conditioned, will not impair the integrity and character of the M-2 zone, because warehouse and industrial buildings are consistent with the surrounding industrial uses in the zone and area, which include commercial office, storage, manufacturing, Research & Development (R&D), refinery and logistics uses;
- f) That the subject site is physically suitable for the proposed use, because parking and access have been designed to meet the development standards and code, as conditioned;
- g) That the proposed project, as conditioned, will be compatible with existing and proposed future land uses within the M-2 zone and the general area in which the proposed project is to be located, because warehouse and industrial uses are permitted and compatible with the other uses permitted and located within the zone;
- h) That the proposed use, as conditioned, will encourage and be consistent with the orderly development of the City as currently exists, based on the current pattern of development and land uses.
- i) That the proposed use, as conditioned, will not discourage the appropriate existing or planned future use of the surrounding property or tenancies, because the

proposed warehouse and industrial uses are compatible with the existing uses and the planned future uses of the surrounding M-2 zoned properties. The properties adjacent to and to the rear of the subject property are zoned Single Family Residential (R-1) and Public Use (P-U), which provide single family residential and a public park, respectively. The proposed project will not discourage the appropriate existing or planned future residential and public park uses, because the project, as conditioned, meets and/or exceeds the development standards related to this project and provides a 10-ft landscaped buffer between the adjacent properties and the parking lot, with the building structure setback further to avoid any potential conflicts;

- j) That there will be adequate provisions for water, sanitation, and public utilities and services to ensure that the proposed development, as conditioned, is not detrimental to the public health and safety, because the project is located within an urbanized area, and within a previously developed site with existing infrastructure, and the project is conditioned to enhance the existing infrastructure;
- k) That there will be adequate provisions for public access to serve the proposed use, because the project, as conditioned, shall provide pedestrian walkways, driveways and on-site parking that meet and/or exceed current standards;
- l) That the location, size, design, and operating characteristics of the proposed use would not be detrimental to the public interest, health, safety, convenience or welfare, or to the property of persons located in the area, because the project, as conditioned, meets and/or exceeds the development standards and code requirements;
- m) That the proposed use, as conditioned, will not produce any or all of the following results:
 - 1. Damage or nuisance from noise, smoke, odor, dust or vibration,
 - 2. Hazard from explosion, contamination or fire,
 - 3. Hazard occasioned by unusual volume or character of traffic or the congregating of large numbers of people or vehicles.

WHEREAS, the Planning Commission by the following roll call vote **ADOPTED** the Mitigated Negative Declaration and **APPROVED** CUP22-00012, subject to conditions:

AYES: COMMISSIONERS:
NOES: COMMISSIONERS:
ABSENT: COMMISSIONERS:

ABSTAIN: COMMISSIONERS:

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission of the City of Torrance hereby finds and determines, as follows:

Section 1. The Mitigated Negative Declaration for the project is hereby ADOPTED.

Section 2. CUP22-00012 filed by The Brookhollow Group (KP Torrance Commerce Center, LLC) to allow the construction of a 132,425 sq. ft. warehouse on property located in the M-2 zone at 2271 - 2341 205th Street is hereby APPROVED subject to the following conditions:

1. That the development and use of the subject space as a warehouse/industrial shall be subject to all conditions imposed in CUP22-00012 and any amendments thereto or modifications thereof as may be approved from time to time pursuant to Section 92.28.1 et seq. of the TMC on file in the office of the Community Development Director of the City of Torrance; and further, that the said use shall be established or constructed and shall be maintained in conformance with such maps, plans, specifications, drawings, applications or other documents presented by the applicant to the Community Development Department and upon which the Planning Commission relied in granting approval;
2. That if CUP22-00012 is not used within one year after granting of the permit, it shall expire and become null and void unless extended by the Community Development Director for an additional period of time as provided for in Section 92.27.1;
3. That all Conditions and Code requirements of DIV22-00003 shall be met; (Planning)
4. That all Mitigation Measures (MMs) and regulatory compliance measures identified in the Mitigation Monitoring and Reporting Program (MMRP) shall be adhered to and implemented during the compliance period; (Planning)
5. That a copy of the MMRP with wet blue ink signature of the property owner or legal agent shall be submitted to the Community Development Department for recordkeeping prior to issuance of the Grading Permit; (Planning)
6. That a copy of Planning Commission Resolutions and the MMRP shall appear on all grading plans, building plans, construction specifications, and bid documents associated with the project to facilitate coordination and effective implementation of the Conditions of Approval and the MMs; (Planning)
7. That any future manufacturing tenants' Business Licenses will not be approved until the manufacturing parking scenario has been implemented, to the satisfaction of the Community Development Director; (Planning)
8. That a site-wide signing and striping plan shall be provided for all drive aisles, parking areas, and pedestrian pathways, which includes stop/yield controls,

directional signage, wayfinding signs for vehicles and pedestrians, and pavement markings to assist right-of-way assignment and pedestrian safety to the satisfaction of the Community Development Director, prior to the issuance of any Building Permits. All parking areas shall be striped with double lines (6" both sides of center, 4" wide stripes) between stalls to facilitate the movement into and out of the parking stalls; (Planning)

9. That project shall demonstrate compliance on the Site Plan with City's Transportation Demand Ordinance (TDM); (Transportation Planning)
10. That the final Building Plans shall provide scalable plans, complete statistics and information, including, but not limited to, manufacturing parking counts, to the satisfaction of the Community Development Director; (Planning)
11. That Electric Vehicle Supply Equipment (EVSE) shall be installed for the purpose of transferring energy to each truck well to accommodate future installation of DC/Level 3 semi-truck charging stations, to the satisfaction of the Community Development Director; (Planning)
12. That all loading and unloading shall be performed within the buildings, directly into trucks parked at approved loading docks, and that all material and product inventories shall be stored within the buildings, to the satisfaction of the Community Development Director; (Planning)
13. That all trucks and shipping containers shall be stored within the designated truck courts and limited to the approved loading bays, to the satisfaction of the Community Development Director; (Planning)
14. That no stacking of shipping containers or similar storage containers shall be permitted on-site; (Planning)
15. That no truck terminal, truck stop, or similar operation shall be permitted on-site; (Planning)
16. That no truck rental, truck repair or maintenance operation, or similar use shall be permitted; (Planning)
17. That no fuel facilities, other than propane tanks, shall be permitted, and that the location of such tanks shall not be visible from 205th Street, Amapola Avenue or Del Amo Boulevard; (Planning)
18. That prior to the issuance of a building permit, the applicant shall enter into negotiations for the formation of, participate in, or annex into, a Community Financing District (CFD) to pay for a portion of the additional costs for ongoing City services, including but not limited to, road maintenance, park maintenance,

lighting, and public safety, to the satisfaction of the Community Development and Finance Directors; (Planning/Finance)

19. That all electrical switchgear cabinets, fire risers, etc., shall be designed within the interior of the subject buildings, and shall be shown on the final Building Plans, and that any exterior doors/walls for this equipment shall be designed as an integral part of the façade, matching color and materials to the satisfaction of the Community Development Director; (Planning)
20. That electrical transformers shall not be located within the front setback areas to 205th St., and that applicant shall continue to work with Fire, Engineering and Planning Staff for the siting and painting of all exterior equipment, including, but not limited to, electrical transformers and double-check detectors/backflow assembly equipment, and shall be shown on the final Building Plans; and that any equipment that is required to be sited aboveground shall be screened with enclosures that match the materials and finishes of the building façade and/or vegetation to the satisfaction of the Community Development Director, and shall be shown on the final Building Plans and/or Landscaping Plans; (Planning)
21. That detailed plans of the trash enclosure/s shall be submitted to the Community Development Director for approval prior to the issuance of any Building Permits. The trash enclosure/s shall be bounded on three sides by solid masonry walls and shall be equipped with solid roll-up doors, decorative trellis, concrete stress pads to reduce pavement stress, bumpers, a rainwater intrusion barrier (solid roof) to meet the current National Pollutant Discharge Elimination System (NPDES) requirements, provide receptacles for the storage and collection of trash and recyclable materials, and constructed of materials and of a design and color that are architecturally compatible with the building to the satisfaction of the Community Development Director; (Planning)
22. That no outdoor or exterior telephones, vending machines, kiosks, storage containers, publication racks, collection and/or donation bins, etc., shall be permitted on-site; (Planning)
23. That the applicant shall provide landscape area/coverage calculations on the final Building Plans' statistics, and that the amount of landscape area provides a minimum of five percent (5%) of its parking lot surface areas, per Code, to the satisfaction of the Community Development Director, and that the applicant shall continue to work with Staff on providing additional landscaping areas, and outdoor employee break areas, and that they shall be incorporated into the final landscaping plan, and that the existing trees that line the northern rear property line shall remain in place; (Planning)
24. That a Landscape Plan Review (LPR) entitlement shall be required, including a landscape plan, and shall be submitted to the Community Development Director for approval, prior to the issuance of any Building Permits associated with the

subject project. The landscape plan shall be implemented prior to occupancy, and shall be maintained to the satisfaction of the Community Development Director. The plan shall utilize drought resistant/xeriscape California friendly vegetation, shade-producing trees, and shall provide state-of-the-art water saving irrigation system and/or drip irrigation for all landscape areas. That the planting arrangement shall include tree wells in the parking lot area, at a ratio of at least one (1) tree per six (6) parking spaces, to reduce the heat island effect. That trash enclosures, transformers, all aboveground equipment and parking lot shall be screened with vegetation of sufficient height and texture to provide an effective screen, to the satisfaction of the Community Development Director, including vegetation screens from headlights positioned toward the adjacent uses and street frontages. The landscape plan shall include the off-site parkways on 205th St. and shall be implemented prior to occupancy, and shall be maintained to the satisfaction of the Community Development Director. That the landscape plan shall comply with the current State Water Efficient Landscape Ordinance; (Planning)

25. That the applicant shall provide samples of all the final exterior color and materials, including, but not limited to, a detail of the building perimeter, finishes, hardware, gates, fences, freestanding walls, site amenities, and pathways, to assure the development has a cohesive design and finish to the satisfaction of the Community Development Director, prior to the issuance of any Building Permits; (Planning)
26. That no chain link fence or similar fence type shall be permitted outside of the buildings, nor visible from any public Rights-of-Way; (Planning)
27. That the pedestrian pathway connections made from the sidewalks along 205th St. to the building shall feature a decorative element, such as stamped concrete or pavers, to the satisfaction of the Community Development Director, and shall be continually maintained; (Planning)
28. That an exterior photometric and lighting plan, in compliance with the latest California Green Code (CGC) shall be submitted to the Community Development Director for approval, prior to the issuance of any Building Permits, associated with the subject project, and shall be designed to provide ratings of zero at property lines. The lighting plan shall ensure that all exterior doorways, parking spaces, and pedestrian walkways are provided with adequate illumination, security lights shall be non-glaring, all building lighting shall be property shielded and designed to prevent excess lighting and glare onto adjacent uses and public streets, and that the light fixtures/bases in the parking lot areas shall be positioned in line with the parking striping, so as not to prevent vehicle overhang, to the satisfaction of the Community Development Director; (Planning)
29. That a roof plan shall be submitted to the Community Development Director for approval prior to the issuance of any Building Permits. The roof plan shall ensure all roof appurtenances, such as ducts and vents, mechanical equipment, electrical boxes, meters, pipes, transformers, air conditioners and any and all other

equipment on the roof shall be completely screened from public view by parapet walls, designed as an integral part of the façade, to the satisfaction of the Community Development Director. Such equipment or screening material shall be constructed in such a manner that noises emanating from the roof appurtenances shall not be audible beyond the property lines; (Planning)

30. That all windows/glazing shall be provided with a protective film or other technology to prevent graffiti; (Planning)
31. That any future request for a Wireless Antenna Facility shall require a separate approval and would provide for all related equipment cabinets to be located within the existing structure or underground; (Planning)
32. That the applicant shall provide verification that the signers of the Covenants, Conditions and Restrictions (CC&R's) have provided approval of the proposal's lesser front setbacks indicated in the CC&R's, prior to Building Permit issuance, to the satisfaction of the Community Development Director; (Planning)
33. That the final Building Plans shall provide the correct number of docks across all pertinent sheets; (Planning)
34. That a complete roof plan noting the varying heights of the parapet shall be provided on the final Building Plans to the satisfaction of the Community Development Director, prior to Building Permit issuance; (Planning)
35. That the freestanding walls shall not exceed a height of eight (8) ft. and shall be specified on the final Building Plans, to the satisfaction of the Community Development Director; (Planning)
36. That a elevations and details of any freestanding walls, fences, gates, railings, etc., shall be provided on the final Building Plans, which consist of architecturally compatible materials with the building's design, to the satisfaction of the Community Development Director; (Planning)
37. That truck parking locations shall be provided on the final Building Plans, to the satisfaction of the Community Development Director; (Planning)
38. That accurate statistics, i.e., manufacturing parking counts, shall be provide on the final Building Plans, to the satisfaction of the Community Development Director; (Planning)
39. That a separate parking plan shall be provided to Planning for approval, prior to the issuance of any Building Permits; (Planning)
40. That within 30 days of the final public hearing, the applicant shall return the City's "Public Notice" sign and stake to Planning (provided there is no appeal); (Planning)

41. That project shall comply with Tier 1 Level CGC requirements; (Building Regulations)
42. That a Certified Access Specialist (CAsp) Report with full compliance shall be provided, prior to final inspection; (Building Regulations)
43. That the sidewalk along 205th St. shall be constructed to jog 5' behind the property line at the driveway aprons; (Engineering)
44. That the owner/developer shall design and reconstruct the existing 42" RCP storm drain main outside the footprint of the proposed building. No building loads shall be imposed on the public storm drain. The storm drain plans and surcharge loads sketch, prepared by a professional engineer, shall be submitted by the applicant / developer to the Engineering Division of Community Development Department for review and approval prior to issuance of Grading Permit. Public storm drain shall be constructed prior to occupancy; (Engineering)
45. That the existing driveways on 205th St. shall be reconstructed to commercial radius type driveways, minimum 25 feet wide, with depressed back of walk and wheelchair ramps. The existing streetlight poles adjacent to the proposed and reconstructed driveway aprons shall have a minimum 5' horizontal clearance from the beginning of curb return; (Engineering)
46. That all connections for water service shall be made to the stub outs provided (unless stub outs are undersized). If existing stub outs are not used, they shall be abandoned at the main; (Engineering)
47. That all proposed and/or existing water meters larger than 2", double check detector assemblies and reduced pressure backflow assemblies shall be located above ground on private property near the public right-of-way and shall be screened from public view with approved plant material. Final location of said facilities and landscape screening shall be incorporated into water, fire and landscape plan for review prior to Building Permit issuance. Landscape screening shall provide access to water and fire department at all times and be maintained diligently to the satisfaction of the Fire Marshal; (Engineering)
48. That fire meter shall be installed for any proposed on-site fire hydrants; (Engineering)
49. That reduced pressure assembly shall be installed for landscape irrigation; (Engineering)
50. That the applicant shall abandon and remove the existing 12" DIP public water main directly under the proposed building per City of Torrance Standards, subject to the satisfaction of the Community Development Director. The proposed water

line alignment shall be indicated on a signed City of Torrance engineering plan; (Engineering)

51. That a hydrology study shall be submitted to and approved by the Engineering Division of the Community Development Department prior to approval of the Grading Plan. The study shall include method of detaining the difference between the 10-year and 50-year storm. Determine proposed building finished floor elevation with adequate freeboard; (Engineering)
52. That the applicant/developer shall design and reconstruct the existing 12" VCP public sewer main outside the footprint of the proposed building. No building loads shall be imposed on the City sewer main. The sewer plans and surcharge loads sketch, prepared by a professional engineer, shall be submitted by the applicant/developer to the Engineering Division of Community Development Department for review and approval prior to issuance of Grading Permit. Public sewer main shall be constructed prior to occupancy; (Engineering)
53. That the applicant/developer shall design and reconstruct the existing 8" private sewer line outside the footprint of the proposed structure to public standards. The existing private sewer main shall be abandoned and removed completely. The sewer plans, prepared by a professional engineer, shall be submitted by the applicant/developer to the Engineering Division of Community Development Department for review and approval prior to issuance of Grading Permit. Private sewer main shall be constructed prior to occupancy; (Engineering)
54. That the applicant shall submit a sewer study discussing the new development's impact on the public sewer system. The study shall include flow monitoring data and be approved by the Engineering Division of the Community Development Department, prior to issuance of Grading Permit. The applicant shall design and construct improvements to the public sewer system as per recommendations of the approved study prior to occupancy; (Engineering)
55. That prohibited signs for this use includes: A-framed or portable signs; bow or flag banners; air-assisted signs; signs attached to light or utility poles, vehicles, trees or other landscape; persons holding signs and temporary signage mounted to the roof of the building; (Environmental)
56. That all signs (new, modified or revised) must be approved by the Environmental Division with appeal rights to the Planning Commission, or comply with the previously approved sign program; (Environmental)
57. That 9" (minimum) contrasting address numerals for non-residential uses shall be provided; (Environmental)

58. That bike rack(s) shall be provided. Applicant shall install on-site bicycle racks and submit placement plan and bicycle rack detail on the final Building Plans to the satisfaction of Environmental Division; (Environmental)
59. That rooftop numbers shall be provided in order to assist law enforcement and other emergency personnel locate the property. The numbers should be 4' high and 2' wide, spaced 12 inches apart, be parallel to the street and be a non-reflective color that contrasts the color of the roof; (Environmental)
60. That all trash shall be kept in an enclosure that is bounded on three sides by a decorative wall, decorative trellis and solid doors and shall be constructed of materials and of a design, color and texture which is architecturally compatible with the buildings and structures on the property; (Environmental)
61. That the trash enclosure shall provide a metal barrier roof covering to prevent rainwater intrusion to meet current NPDES requirements; (Environmental)
62. That bins/containers within trash enclosure for the storage and retrieval of trash and recyclable materials shall be provided; (Environmental)
63. Upon completion of the project, the applicant shall hire a CASp to verify that project is in compliance with California Building Code. All deficiencies shall be addressed to the satisfaction of the Building Official; (Grading)
64. That the business name and address shall be visible from street; (Police)
65. That non-glare security lighting shall be installed for the parking lot; (Police)
66. That four-foot tall address numerals shall be painted on rooftop for aerial identification; (Police)
67. That secured property shall provide Knox Box lock access for Police and Fire, and includes any secured vehicle gates for expedited emergency response; and (Police)
68. That all conditions of all other City departments received prior to or during the consideration of this case by the Planning Commission shall be met.

Introduced, approved and adopted this 16th day of April 2025.

Chairman, Torrance Planning Commission

ATTEST:

Secretary, Torrance Planning Commission

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss
CITY OF TORRANCE)

I, ROBERT GARCIA, Secretary to the Planning Commission of the City of Torrance, California, do hereby certify that the foregoing resolution was duly introduced, approved, and adopted by the Planning Commission of the City of Torrance at a regular meeting of said Commission held on the 16th day of April 2025, by the following roll call vote:

AYES: COMMISSIONERS:
NOES: COMMISSIONERS:
ABSENT: COMMISSIONERS:
ABSTAIN: COMMISSIONERS:

Secretary, Torrance Planning Commission

PLANNING COMMISSION RESOLUTION NO. 25-031

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF TORRANCE, CALIFORNIA, ADOPTING A MITIGATED NEGATIVE DECLARATION AND APPROVING A DIVISION OF LOT AS PROVIDED FOR IN DIVISION 9, CHAPTER 2, ARTICLE 29 OF THE TORRANCE MUNICIPAL CODE TO ALLOW THE CONSOLIDATION OF FOUR LOTS INTO ONE LOT IN CONJUNCTION WITH A CONDITIONAL USE PERMIT TO ALLOW THE CONSTRUCTION A 132,425 SQ. FT. WAREHOUSE/ INDUSTRIAL COMPLEX ON PROPERTY LOCATED IN THE M-2 ZONE AT 2271 - 2341 205TH STREET.

**DIV22-00003: THE BROOKHOLLOW GROUP
(KP TORRANCE COMMERCE CENTER, LLC)**

WHEREAS, the Planning Commission of the City of Torrance conducted a public hearing on April 16, 2025, to consider the adoption of a Mitigated Negative Declaration (MND) and an application filed by The Brookhollow Group (KP Torrance Commerce Center, LLC) for approval of a Conditional Use Permit (CUP22-00003) to allow the construction of a 132,425 sq. ft. warehouse/industrial building, with approximately 20% cold storage, in conjunction with a Division of Lot (DIV22-00003) to allow the consolidation of four lots into one lot on property located in the Heavy Manufacturing District (M-2) zone at 2271 - 2341 205th Street; and

WHEREAS, due and legal publication of notice was given to owners of property in the vicinity thereof and due and legal hearings have been held, all in accordance with the provisions of Division 9, Chapter 2, Article 29 of the Torrance Municipal Code; and

WHEREAS, pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Torrance is the lead agency for the project; and

WHEREAS, the environmental impacts of the construction and operation of the proposed project were analyzed in an Environmental Assessment (EAS22-00003); and

WHEREAS, EAS22-00003 has been prepared pursuant to CEQA, as amended (*Public Resources Code* §21000 et seq.) and in accordance with the State CEQA Guidelines (*California Code of Regulations*, Title 14, §15000 et seq.); and

WHEREAS, said EAS22-00003 was filed with the Los Angeles County Clerk (#2024050384) and circulated for Public Review between May 10, 2024 and June 10, 2024; and

WHEREAS, based on all the evidence found and public testimony considered, the Planning Commission of the City of Torrance has carefully read and considered EAS22-00003, and have determined that the document reflects the City's independent judgment

and has been prepared in accordance with CEQA, and by roll call vote approved a motion to adopt a Mitigated Negative Declaration for the 205th Street Industrial Project; and

WHEREAS, the Planning Commission of the City of Torrance does hereby find and determine as follows:

- a) That the property is located at 2271 – 2341 205th Street;
- b) That the property is further described as Lots 4, 5, 6 and 7 of Tract 39796, APN 7352-018-004 and 7352-018-066;
- c) That the proposed Division of Lot, together with provision for its design and improvement, is consistent with the M-2 zone;
- d) That the proposed construction of a 132,425 sq. ft. warehouse is conditionally permitted within the M-2 zone;
- e) That the site is physically suitable for the proposed type and density of development, and the subdivision to allow for lot consolidation, as conditioned, because the proposed project will be compatible with the development pattern in the area, and is conditionally permitted within the proposed M-2 zone, and the resulting parcel meets the development standards for size and dimensions;
- f) That the proposed subdivision will not interfere with the orderly development of the City and will incorporate a high quality design;
- g) That the design of the development and subdivision will not cause substantial environmental damage or substantially injure fish or wildlife or their habitat, as assessed and determined in EAS22-00003;
- h) That the design of the development and subdivision will not cause serious public health problems as the proposed construction of a 132,425 sq. ft. warehouse/industrial building, with approximately 20% cold storage, as conditioned, will not produce any or all of the following results:
 - Damage or nuisance from noise, smoke, odor, dust or vibration,
 - Hazard from explosion, contamination or fire,
 - Hazard occasioned by unusual volume or character of traffic or the congregating of large numbers of people or vehicles;
- i) That the design of the development and subdivision will not conflict with any public access or easements, as all means of public access are either being maintained or improved;

WHEREAS, the Planning Commission by the following roll call vote ADOPTED the Mitigated Negative Declaration and **APPROVED** DIV22-00003, subject to conditions:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS

ABSENT: COMMISSIONERS:

ABSTAIN: COMMISSIONERS:

NOW, THEREFORE, BE IT RESOLVED that

Section 1. The MND for the project is hereby ADOPTED.

Section 2. DIV22-00003 filed by The Brookhollow Group (KP Torrance Commerce Center, LLC) to allow the subdivision to allow the reconfiguration of four lots into one lot, in conjunction with a CUP22-00012 to allow the construction of a 132,425 sq. ft. warehouse/industrial building on property located in the M-2 zone at 2271 - 2341 205th Street, on file in the Community Development Department of the City of Torrance, is hereby APPROVED subject to the following conditions:

1. That the development and use of the subject space as a warehouse/industrial building shall be subject to all conditions imposed in DIV22-00003; and any amendments thereto or modifications thereof as may be approved from time to time pursuant to Section 92.28.1 et seq. of the TMC on file in the office of the Community Development Director of the City of Torrance; and further, that the said use shall be established or constructed and shall be maintained in conformance with such maps, plans, specifications, drawings, applications or other documents presented by the applicant to the Community Development Department and upon which the Planning Commission relied in granting approval;
2. That if DIV22-00003 is not used within two years after granting of the permit, it shall expire and become null and void unless extended by the Community Development Director for an additional period as provided for in Section 92.29.13;
3. That all Conditions and Code requirements of CUP22-00012 shall be met; (Planning)
4. That the property owner shall dedicate an additional 2' wide easement (for a total of 12' easement) for the existing storm drain along the north side of the property; (Engineering)
5. That the 45' wide easement for storm drain, sanitary sewer, emergency access and utility purposes shall be quitclaimed and relocated. The re-dedicated easement shall be reflected on the Final Parcel Map; (Engineering)

6. That the property owner shall dedicate 5' wide easements for street purposes along the proposed sidewalk jogs behind the two driveway aprons on 205th Street; (Engineering)
7. That centerline ties be filed with and checked by the Community Development Department, Engineering Division; (Engineering)
8. That a lot tie agreement shall be recorded providing that multiple lots underlying this property shall not be sold, leased, or financed separately. The lot tie agreement shall be recorded prior to granting of any Building Permits and Parcel Map shall be recorded prior to occupancy; and (Engineering)
9. That all conditions of all other City departments received prior to or during the consideration of this case by the Planning Commission shall be met.

Introduced, approved and adopted this 16th day of April 2025.

Chairman, Torrance Planning Commission

ATTEST:

Secretary, Torrance Planning Commission

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss
CITY OF TORRANCE)

I, ROBERT GARCIA, Secretary to the Planning Commission of the City of Torrance, California, do hereby certify that the foregoing resolution was duly introduced, approved, and adopted by the Planning Commission of the City of Torrance at a regular meeting of said Commission held on the 16th day of April 2025, by the following roll call vote:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS

ABSENT: COMMISSIONERS:

ABSTAIN: COMMISSIONERS:

Secretary, Torrance Planning Commission

PLANNING COMMISSION RESOLUTION NO. 25-032

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF TORRANCE, CALIFORNIA APPROVING A MITIGATED NEGATIVE DECLARATION FOR THE 2271 - 2341 205TH STREET WAREHOUSE/INDUSTRIAL PROJECT IN ACCORDANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

**EAS22-00003: THE BROOKHOLLOW GROUP
(KP TORRANCE COMMERCE CENTER, LLC)**

WHEREAS, the Planning Commission of the City of Torrance conducted a duly noticed public hearing on April 16, 2025 to consider an application filed by The Brookhollow Group (KP Torrance Commerce Center, LLC) for adoption of a Mitigated Negative Declaration (MND) in accordance with the California Environmental Quality Act (CEQA), and for approval of a Conditional Use Permit (CUP22-00012) to allow the construction of a warehouse/industrial building, in conjunction with a Division of Lot (DIV22-00003) to consolidate four existing lots into one lot, on property located in the M-2 zone at 2271 - 2341 205th Street, referred to as the 205th Street Industrial Project; and

WHEREAS, due and legal publication of notice was given to owners of property in the vicinity thereof and due and legal hearings have been held, all in accordance with the provisions of Division 9, Chapter 5, Article 1 and Division 9, Chapter 2, Article 29 of the Torrance Municipal Code (TMC); and

WHEREAS, pursuant to the CEQA), Public Resources Code Section 21000 et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.), as amended, the City of Torrance is the Lead Agency responsible for preparation and consideration of the environmental review for the 205th Street Industrial Project; and

WHEREAS, an Initial Study was prepared to assess the potential environmental impacts associated with the 205th Street Industrial Project, and said Initial Study concluded that the project may result in or cause potentially significant effects. However, compliance with existing policies, plans and regulations, revisions to the plans, together with design features and mitigation measures incorporated would avoid the effects or mitigate the effects to levels that would be less than significant. Therefore, the City of Torrance has determined a MND is appropriate and that no further environmental review is required; and

WHEREAS, notices of the Initial Study/Mitigated Negative Declaration (IS/MND) and its availability for review and comment were filed and circulated for a thirty-one (31) calendar day period commencing on May 10, 2024, and ending on June 10, 2024; and

WHEREAS, during the review and comment period, affected public agencies and any interested parties were able to comment on the adequacy of the IS/MND in identifying and analyzing the potential environmental impacts associated with the 205th Street Industrial Project and the ways in which potentially significant effects can be avoided or mitigated; and

WHEREAS, comment letters were received from private parties and public agencies related to the IS/MND prepared for the 205th Street Industrial Project, and have been thoroughly reviewed to determine whether any new substantial environmental issues have been raised; and

WHEREAS, although CEQA does not require a formal response to each of the comments received on the IS/MND, a Response to Comments has nonetheless been prepared for letters addressing the project and/or CEQA issues, in order to provide the decision-making body with additional information upon which to base their decision; and

WHEREAS, based on the evaluation in the IS/MND together with all comments received, no new substantial environmental issues have been raised and that all issues raised in the comment letters have been adequately addressed in the IS/MND and in the Response to Comments. All potential impacts associated with the 205th Street Industrial Project were found to be less than significant with incorporation of relevant mitigation measures, where applicable. Therefore, the findings and conclusions of the IS/MND are not affected, and no revisions are required or proposed; and

WHEREAS, a Mitigation Monitoring and Reporting Program (MMRP) has been prepared that list all of the mitigation measures, specifies the appropriate responsible party for implementing each mitigation measure, and identifies approximate time frames for implementing of each mitigation measure; and

WHEREAS, the IS/MND and MMRP and all documents and records relating to the 205th Street Industrial Project are on file and available for review with the Community Development Department of the City of Torrance, located at 3031 Torrance Boulevard, Torrance, CA 90503; and

NOW, THEREFORE, BE IT RESOLVED the Planning Commission of the City of Torrance hereby finds and determine as follows:

- a. That the IS/MND was properly prepared and circulated for public review in accordance with the CEQA
- b. That the IS/MND was carefully considered and all comments thereon, and is the appropriate environmental document for the project, and reflects the independent judgment and analysis of the City of Torrance as the Lead Agency, and that no further environmental review is required;
- c. That with implementation of the mitigation measures identified in the IS/MND and included in and enforced by the MMRP, and on the basis of the whole record and

public testimony considered, there is no substantial evidence that the project will have a significant effect on the environment;

- d. That the MND is hereby adopted; and
- e. That the IS/MND and MMRP and the documents and records relating to the project are on file with the Community Development Department of the City of Torrance, located at 3031 Torrance Boulevard, Torrance, CA 90503.

INTRODUCED, APPROVED, and ADOPTED at the regular meeting of the Planning Commission of the City of Torrance held on the 16th day of April 2025 by the following roll call vote:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS

ABSENT: COMMISSIONERS:

ABSTAIN: COMMISSIONERS:

Chairman, Torrance Planning Commission

ATTEST:

Secretary, Torrance Planning Commission

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss
CITY OF TORRANCE)

I, ROBERT GARCIA, Secretary to the Planning Commission of the City of Torrance, California, do hereby certify that the foregoing resolution was duly introduced, approved, and adopted by the Planning Commission of the City of Torrance at a regular meeting of said Commission held on the 16th day of April 2025, by the following roll call vote:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS

ABSENT: COMMISSIONERS:

ABSTAIN: COMMISSIONERS:

Secretary, Torrance Planning Commission

ITEM 8B
ATTACHMENT 2

Location & Zoning Map



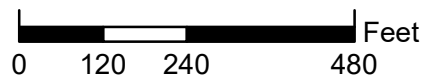
LOCATION AND ZONING MAP

CUP22-00012, DIV22-00003,
(EAS22-00003)
2271 and 2341 205th Street



LEGEND

- 2281 and 2341 205th St
- Notification Area



ITEM 8B
ATTACHMENT 3
Code Requirements

CODE REQUIREMENTS

The following is a partial list of Code requirements applicable to the proposed project. All possible Code requirements are not provided here and the applicant is strongly advised to contact each individual department for further clarification. The Planning Commission may not waive or alter the Code requirements. They are provided for information purposes only.

CDD - Building Regulations:

1. Comply with 2022 CBC, CMC, CEC, CPC & CGBC.

CDD - Engineering - Permits and Records:

Conditional Use Permit

2. A Construction and Excavation Permit (C&E Permit) is required from the Community Development Department, Engineering Permits and Records Division, for any work in the public right-of-way on 205th St. (City Code Sec. 74.6.2)
3. Close abandoned driveways with full height curb and gutter to match existing on 205th St. (City Code sec. 74.4.4).
4. Install street trees in the 5' planting easement behind the sidewalk every 50' for the width of this lot along 205th St. (City Code sec. 74.3.2). Contact the Streetscape Division of the Torrance Public Works Department at 310-781-6900 for information on the type and size of tree for your area.
5. Remove and replace Ficus trees in the planting easement that has lifted the existing public sidewalk on 205th St. (City Code sec. 74.3.2). Contact the Streetscape Division of the Torrance Public Works Department at 310-781-6900 prior to tree removal and for information on the type and size of tree to be planted for your area.
6. Replace damaged curb and gutter along the project frontage on 205th St. per City of Torrance standards.
7. Replace grinded, lifted, and cracked sidewalk along the project frontage on 205th St. per City of Torrance standards.
8. Submit a site plan showing the proposed location and size of all water services (domestic, fire and recycled) for the project to the Engineering Division of the Community Development Department, prior to issuance of Building Permits.
9. That on-site drainage shall be collected within the lot and drained through the curb to the public street on 205th Street. (City Code Sec. 81.2.52). No private storm drain pipe shall be connected to public catch basin directly unless approved in advance by the Engineering Division of Community Development Department.

Division of Lot

10. All the proposed and existing public easements shall be shown on Final Parcel Map. Quitclaim all the abandoned public easements on the Final Parcel Map.
11. All Final Parcel Maps are to be compiled from field survey data unless otherwise approved by the City Engineer. (City Code Section 92.29.7)

12. All physical public improvements which are conditions of this Planning Case must be completed prior to occupancy.
13. Remove all existing structures prior to Final Parcel Map recordation.
14. Tentative Map must be submitted and approved by the City of Torrance prior to the granting of Building Permits and Final Map must be recorded by the County prior to the granting of occupancy.

CDD - Environmental:

15. The Van Accessible loading area shall be at least 8 feet wide and the words "NO PARKING" shall be painted on the ground within each loading access aisle in white lettering no less than 12 inches high and located so that it is visible to traffic enforcement officials.
16. Double-line stripe all parking spaces per Torrance Code (93.4.6).
17. Screen all roof equipment from public view per Torrance Code (92.30.2).

CDD - Grading:

18. The applicant shall apply for a grading permit and provide precise grading plan prepared by a Registered Civil Engineer for approval by the Building and Safety Division. The plans shall address the specific grading, drainage, and geotechnical design parameters for design of the proposed construction. The plans should include, but not be limited to: specific elevation grades, keyways, subdrains, limits of removals, retaining walls callouts every 15 to 30 feet, and other information necessary to establish in detail the horizontal and vertical geometric design. The plans shall reference the approved geotechnical report, and reflect cut, fill, compaction and over-excavation requirements contained therein. The plans shall reflect all proposed drainage facilities, including storm drains, area drains, catch basins/inlets, swales, and other drainage devices necessary for the interception, conveyance and disposal of on-site and offsite drainage consistent with the project drainage report per TMC 81.2.49 (J103) and TMC 81.2.50(J104). Precise grading plan shall detail compliance paths of travel, accessible parking stalls per 2022 California Building Code (CBC) 11B-201
19. The applicant shall submit a detailed geotechnical report prepared by a registered design professional. The geotechnical report must specifically address the proposed improvements including engineering calculations for all graded slopes, foundations, retaining walls, temporary excavations and other aspects as required by the proposed development. The report shall present detailed geotechnical recommendations for design and construction of the proposed project and improvements. The reports should be in accordance with the County of Los Angeles standards and to the satisfaction of the City of Torrance Building and Safety Division standards and requirements. TMC 81.2.50 and CBC 1803. Slope setbacks shall comply with 2022 California Building Code section 1808.7 if applicable.
20. The applicant shall have a final drainage study prepared by a Registered Civil Engineer. The drainage study shall be prepared in report format and include sections addressing on-site and off-site drainage areas, existing and developed conditions hydrology, the design hydraulics for the on-site drainage system,

including sizing of inlets, conduits, v-ditches, down drains and other structures, and associated calculations and conclusions. The drainage study shall demonstrate project compliance with the current Los Angeles County Public Work Department's Hydrology Manual and Hydraulic Design Manual; however the minimum design flow for sizing onsite drainage devices shall be 25 year recurrence (Q25) or 50 year storm for sump conditions. The drainage study shall be submitted to the Building and Safety and approved by the Building official prior the issuance of a grading permit Per TMC 81.2.50 (J104.9)

21. All drainage shall be sloped 2% away from all parts of building structures along impervious surface and 5% away along pervious surface, in conformance with California Building Code; and conveyed through an on-site storm drain system to an approved point of disposal (i.e. street) per CBC 1804.4 and TMC 81.2.51 (J107.6)
22. Drainage plans shall incorporate appropriate post-construction best management practices (BMPs) into the design of the project and must be prepared and approved prior to issuance of any grading permit per TMC 411.1.050. Please refer to the Los Angeles County Low Impact Development (LID) Manual for applicable design requirements. The project-specific LID plans shall describe how this project design conforms to all requirements set forth in the LID manual and must include a fully executed and recorded LID covenant to provide for on-going maintenance of the BMPs that have been chosen. Stormwater quality design volume (SWQDv) shall be retained onsite per TMC 411.1.070.
23. Per TMC 410.1.070 the owner/owner's agent shall submit erosion control plan to Building and Safety review and approval from Building Official to ensure the following minimum requirements are effectively implemented at the construction site:
 24. Sediments generated on the project site shall be retained using adequate Treatment Control or Structural BMPs;
 25. Construction-related materials, wastes, spills, or residues shall be retained at the project site to avoid discharge to streets, drainage facilities, receiving waters, or adjacent properties by wind or runoff;
 26. Non-storm water runoff from equipment and vehicle washing and any other activity shall be contained at the project site; and
 27. Erosion from slopes and channels shall be controlled by implementing an effective combination of BMPs, such as the limiting of grading scheduled during the wet season; inspecting graded areas during rain events; planting and maintenance of vegetation on slopes; and covering erosion susceptible slopes.
28. Cover sheet of construction document shall include area (acres) of disturbed soil, disturbed soil 1 acre or more required the owner to file a Notice of Intent with the Division of Water Quality of State Water Resources Control Board and prepare a SWPPP per TMC 410.1.070.
29. All undocumented fill shall be removed, until competent native soils have reached, and recompacted from property line to property line. TMC 81.2.50(J104.5)
30. Retaining wall proposed to accommodate the cuts and fills shall obtain separate building permit from Building and Safety Division per CBC 105, TMC 81.2.47 (J101.3.1) and TMC 81.2.49(J103).

31. All lots shall have a minimum grade of 1%. The lot shall be graded to drain to the street per TMC 81.2.51(J107.6)
32. Ponding of water shall not be permitted to occur on pavement, concrete or in landscape areas per TMC 81.2.53
33. Stormdrain line under buildings and structures shall be removed and abandoned per TMC 81.2.53

CDD - Planning:

34. Provide 5% minimum landscaping for parking lot (TMC Sec. 93.6.2), and comply with State Department of Water Resources Landscape Design & Irrigation requirements.
35. Provide minimum parking per TMC, including minimum ADA and EV chargers and stalls and Clean Air stalls per CBC and CGC Codes (TMC Sec. 93.2.18, 93.2.33).

Fire – Fire Prevention/HazMat:

36. Comply with CGC 2022.
37. Comply with Fire Access SOG.

ITEM 8B
ATTACHMENT 4

Correspondence



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email

July 27, 2023

Rebecca Poirier, City Clerk
City of Torrance
City Clerk's Office
3031 Torrance Blvd.
Torrance, CA 90503
CityClerk@torranceca.gov

Michelle Ramirez, Community Development Director
City of Torrance
Community Development Department
3031 Torrance Blvd.
Torrance, CA 90503
Community_Dept@TorranceCA.Gov

Re: CEQA and Land Use Notice Request for 2281 205th Street (CUP22-00012; DIV22-00003)

Dear Ms. Poirier and Ms. Ramirez:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the 2281 205th Street Project (CUP22-00012; DIV22-00003), including all actions referring or related to the proposed development of a light industrial building measuring 132,000 square feet, located at 2281 205th Street in the City of Torrance ("Project").

We hereby request that the City of Torrance ("City") send by electronic mail, if possible or U.S. mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.
 - Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
 - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
 - Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
 - Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.

July 27, 2023

CEQA and Land Use Notice Request for 2281 205th Street (CUP22-00012; DIV22-00003)

Page 2 of 2

- Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which require local counties to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

In addition, we request that the City send to us via email or U.S. Mail a copy of all Planning Commission and City Council meeting and/or hearing agendas.

Please send notice by electronic mail, if possible or U.S. mail to:

Richard Drury
Madeline Dawson
Layne Fajeau
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
richard@lozeaudrury.com
madeline@lozeaudrury.com
layne@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Madeline Dawson
Legal Assistant
Lozeau | Drury LLP

From: [Madeline Dawson](#)
To: [Gomez, Yolanda](#)
Cc: [Layne Fajeau](#)
Subject: CEQA and Land Use Notice Request for 2281 205th Street (CUP22-00012; DIV22-00003)
Date: Tuesday, August 15, 2023 2:40:57 PM
Attachments: [2023.08.15 CEQA and Land Use Notice Request for 2281 205th Street.pdf](#)

Dear Ms. Poirier, Ms. Ramirez, and Ms. Gomez:

Attached please find a CEQA and Land Use Notice Request for the 2281 205th Street Project (CUP22-00012; DIV22-00003), submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER"). Please feel free to contact our office regarding any questions you may have.

Thank you,
Madeline Dawson

--

Madeline Dawson (she/her)
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Via Email

August 15, 2023

Rebecca Poirier, City Clerk
City of Torrance
City Clerk's Office
3031 Torrance Blvd.
Torrance, CA 90503
CityClerk@torranceca.gov

Michelle Ramirez, Community Development Director
City of Torrance
Community Development Department
3031 Torrance Blvd.
Torrance, CA 90503
Community_Dept@TorranceCA.Gov

Yolanda Gomez, Planning Associate
City of Torrance
Community Development Department
3031 Torrance Blvd.
Torrance, CA 90503
YGOMEZ@torranceca.gov

Re: **CEQA and Land Use Notice Request for 2281 205th Street (CUP22-00012; DIV22-00003)**

Dear Ms. Poirier, Ms. Ramirez, and Ms. Gomez:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the 2281 205th Street Project (CUP22-00012; DIV22-00003), including all actions referring or related to the proposed development of a light industrial building measuring 132,000 square feet, located at 2281 205th Street in the City of Torrance ("Project").

We hereby request that the City of Torrance ("City") send by electronic mail, if possible or U.S. mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
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 - Notices of any public hearing held pursuant to CEQA.
 - Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
 - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.

August 15, 2023

CEQA and Land Use Notice Request for 2281 205th Street (CUP22-00012; DIV22-00003)

Page 2 of 2

- Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
- Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
- Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which require local counties to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

In addition, we request that the City send to us via email or U.S. Mail a copy of all Planning Commission and City Council meeting and/or hearing agendas.

Please send notice by electronic mail, if possible or U.S. mail to:

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richard@lozeaudrury.com
madeline@lozeaudrury.com
layne@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Madeline Dawson
Legal Assistant
Lozeau | Drury LLP



May 22, 2024

Ref. DOC 7224223

VIA EMAIL cddinfo@torranceca.gov

Mr. Leo Oorts, Planning Manager
City of Torrance
Community Development Department
Planning Division
3031 Torrance Boulevard
Torrance, CA 90503

Dear Mr. Oorts:

NOI Response to 205th Street Industrial Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration (MND) for the subject project located in the City of Torrance on May 13, 2024. The proposed project is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' North Torrance Extension Trunk Sewer, located in Del Amo Boulevard at Madrid Avenue. The Districts' 21-inch diameter trunk sewer has a capacity of 5.9 million gallons per day (mgd) and conveyed a peak flow of 4.4 mgd when last measured in 2017.
2. A copy of the Districts' average wastewater generation factors can be found at [Table 1, Loadings for Each Class of Land Use](#).
3. The wastewater generated by the proposed project will be treated at the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 247.2 mgd.
4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. More information and a copy of the Connection Fee Information Sheet can be found on our website at [Wastewater Rate](#). In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, please contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

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

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacs.org.

Very truly yours,

Patricia Horsley

Patricia Horsley
Environmental Planner
Facilities Planning Department

PLH:plh

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897- 0673
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life*

June 3, 2024

Leo Oorts, Planning Manager
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503

RE: 205th Street Industrial Project –
Mitigated Negative Declaration (MND)
SCH #2024050384
GTS #07-LA-2024-04526
LA-405/R 14.92

Dear Leo Oorts,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Proposed Project consists of the demolition of existing buildings (totaling approximately 86,995 SF) onsite and construction of a new light industrial building totaling approximately 132,425 SF. The Project would include a parking lot with 195 parking stalls, ornamental landscaping, employee patio area, and associated infrastructure.

After reviewing the MND, Caltrans has the following comments:

According to the City of Torrance's guidelines, projects which would generate fewer than 110 average daily trips (ADT) would not cause a substantial increase in the total citywide or regional Vehicle Miles Traveled (VMT). Analysis finds that the Proposed Project would generate a net decrease of 261 weekday daily trips and would not create new trips. Therefore, VMT impacts would be considered less than significant and further analysis of VMT would not be required.

As a reminder, Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using VMT as the primary metric in identifying transportation impacts for all future development projects. Caltrans' targets of tripling trips made by bicycle, doubling trips made by walking

and public transit, and a 15% reduction in statewide VMT can be achieved through collaborative improvements to the state-wide transportation network.

The Project is evaluated to have a less than significant impact with a program, plan, ordinance, or policy addressing the circulation system which includes bicycle and pedestrian facilities. The existing sidewalk system will provide pedestrian accessibility, as well as the nearby transit stops, and bike racks will be included near entry points. Caltrans recommends this Project remain consistent with the City's policies and procedures, and suggests the City makes an effort to develop their own Complete Streets Plan to enhance bicycle and pedestrian infrastructure. It is also recommended to follow other complete street resources and guidance, such as Caltrans' Traffic Calming Guide or Main Street Guide, the Federal Highway Administration (FHWA) various publications about multimodal networks, or the National Association of City Transportation Officials (NACTO) various guides about urban bikeways and urban street design to promote multi-mobility.

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

If you have any questions, please contact project coordinator Frances Duong, at frances.duong@dot.ca.gov and refer to GTS #07-LA-2024-04526.

Sincerely,


Miya Edmonson
LDR/CEQA Branch Chief

Cc: State Clearinghouse

BLUM, COLLINS & HO LLP

ATTORNEYS AT LAW
AON CENTER
707 WILSHIRE BOULEVARD
SUITE 4880
LOS ANGELES, CALIFORNIA 90017
(213) 572-0400

June 7, 2024

Leo Oorts
Planning Manager
Community Development Department
Planning Division
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503

Via Email To:
CDDinfo@TorranceCA.Gov

Subject: Comments on 205th Street Industrial Project MND (SCH NO. 2024050384)

Dear Mr. Oorts,

Thank you for the opportunity to comment on the Mitigated Negative Declaration (MND) for the proposed 205th Street Industrial Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

1.0 Summary

The project proposes to demolish all existing onsite buildings (totaling approximately 86,995 square feet) and construct a new light industrial building totaling approximately 132,425 square feet. The building includes 95,940 square feet of light industrial space, 5,000 square feet of ground floor office space, and 5,000 square feet of mezzanine office space. Approximately 20 percent of the overall building square footage (26,485 square feet) would be utilized for warehouse cold storage uses. The building is 45 feet tall and has a FAR of 0.49. The building proposes 25 truck/trailer loading dock doors on the north side of the building, placing the truck/trailer court immediately adjacent to the single family residences and Pueblo Park.

3.0 Air Quality, 6.0 Energy, and 8.0 Greenhouse Gas Emissions

Please refer to attachments from SWAPE for a complete technical commentary and analysis.

The MND does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0¹, CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6037650901) ranks worse than 92% of the rest of the state overall in pollution burden. The surrounding community, including residences immediately adjacent (share a property line) to the north and adjacent SB 535 Census Tracts 6037980005 and 6037292000, bears the impact of multiple sources of pollution and is more polluted than average on every pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 75th percentile for PM 2.5 burden, which is typically attributed to heavy truck activity in the area. The census tract ranks in the 99th percentile for toxic releases² and hazardous waste³ impacts. People living near facilities that emit toxic releases may breathe contaminated air regularly or if contaminants are released during an accident. Hazardous waste generators and facilities contribute to the contamination of air, water and soil near waste generators and facilities can harm the environment as well as people.

Additionally, the project's census tract (6037650901) and the census tracts adjacent to the project site (6037980005 and 6037292000) are identified as SB 535 Disadvantaged Communities⁴, which is not discussed or presented for analysis in the MND.

The State of California lists three approved energy compliance modeling softwares⁵ for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The spreadsheet-based modeling and CalEEMod energy calculations in the MND do not comply with the 2019 Building Energy Efficiency Standards and under reports the project's potentially significant GHG and Energy impacts to the public and decision makers. Since the MND did not accurately or adequately model the energy impacts in compliance with Title 24,

¹ CalEnviroScreen 4.0 <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

² OEHHA Toxic Releases <https://oehha.ca.gov/calenviroscreen/indicator/toxic-releases-facilities>

³ OEHHA Hazardous Waste Generators and Facilities

<https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities>

⁴ OEHHA SB 535 Census Tracts <https://oehha.ca.gov/calenviroscreen/sb535>

⁵ 2019 Building Energy Efficiency Standards Approved Computer Compliance Programs, California Energy Commission. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-2>

a finding of significance must be made. An EIR with modeling in one of the approved software types must be circulated for public review in order to adequately analyze the project's potentially significant environmental impacts. This is vital as the MND utilizes CalEEMod as a source in its methodology and analysis, which is clearly not one of the approved softwares.

11.0 Land Use and Planning

The MND does not include a consistency analysis with the goals of SCAG's 2020-2045 RTP/SCS (Connect SoCal). Due to errors in modeling and modeling without supporting evidence, the proposed project is inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. An EIR must be prepared to include an analysis with the 2020-2045 RTP/SCS Connect SoCal document.

The MND does not discuss or analyze the project's compliance with the General Plan's Land Use Buildout Scenario. Table 3-4: Nonresidential Land Buildout Estimates Proposed General Plan of the General Plan EIR⁶ notes that the Industrial Business Park designation supports the development of 17,271,000 sf of building area through the document's 2030 horizon year. The project's proposed 132,425 sf of industrial space is 0.7% of the total Industrial Business Park building area permitted over the 20 year General Plan period, which represents a significant amount of growth attributed to a single project. The MND does not provide any information or analysis on the buildout conditions of the General Plan and an EIR must be provided to include this information for analysis.

14.0 Population and Housing

The MND concludes that impacts to population and housing will not be significant because "the employees that would fill these roles are *anticipated* to come from the *region*, as the unemployment rate of Los Angeles County in March 2023 was 5.0 percent, the City of Torrance was 3.8 percent, the City of Long Beach was 5.0 percent, and the City of Los Angeles was at 5.1 percent," without providing any quantified analysis or meaningful evidence to support this claim. The MND has not provided any evidence that the unemployed workforce is interested in or qualified for work in the industrial sector. Relying on the greater Los Angeles County workforce to fill the project's jobs will result in significant increases to worker VMT. For example, the project site is approximately 83 miles from Lancaster, 47 miles from Westlake Village, and 47 miles from Claremont.

⁶ <https://www.torranceca.gov/our-city/community-development/planning-division/comprehensive-planning/general-plan/general-plan-draft-eir>

There is also no analysis of projects approved, proposed, or “in the pipeline” of the City to demonstrate that the combined workforce of all projects does not exceed the growth estimates analyzed by the City’s General Plan or SCAG’s employment growth forecasts. Relying on the entire labor force within the entire Los Angeles County region to fill the project’s construction and operational jobs will increase VMT and emissions during all phases of construction and operations and an EIR must be prepared to account for longer worker trip distances. Further, the MND has utilized the employment generation rate for the incorrect county within the data source. SCAG’s Employment Density Study⁷ provides the following applicable employment generation rates for Los Angeles County:

Light Manufacturing: 1 employee per 829 square feet

Applying the ratio results in the following calculation:

Light Manufacturing: $132,425 \text{ sf} / 829 \text{ sf} = 160$

Total: 160 employees

Utilizing SCAG’s Employment Density Study ratio for Los Angeles County, the proposed project will generate 160 employees. The MND utilizes uncertain and misleading language which does not provide any meaningful analysis of the project’s population and employment generation. In order to comply with CEQA’s requirements for meaningful disclosure, an EIR must be prepared to provide an accurate estimate of employees generated by all uses of the proposed project. It must also provide demographic and geographic information on the location of qualified workers to fill these positions.

SCAG’s Connect SoCal Demographics and Growth Forecast⁸ notes that the City will add 7,200 jobs between 2016 - 2045. Utilizing SCAG’s Employment Density Study calculation for Los Angeles County of 160 employees, the project represents 2.2% of the City’s employment growth from 2016 - 2045. SCAG’s Growth Forecast notes that the City’s population will increase by 6,000 residents between 2016 - 2045. Utilizing SCAG’s Employment Density Study calculation of 160 employees, the project represents 2.6% of the City’s population growth from 2016 - 2045. A single project accounting for this amount of the projected employment and/or population over

⁷ SCAG Employment Density Study

<http://www.mwcog.org/file.aspx?A=QTTITR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6IXOU%3D>

⁸ SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020

https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579

29 years represents a significant amount of growth. An EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects “in the pipeline” to determine if the project will exceed SCAG’s employment or population growth forecast for the City and/or the City’s General Plan growth forecasts. For example, other recent projects such as Torrance Gateway Phase III (881 employees) combined with the proposed project will cumulatively generate 1,041 employees, which is 14.4% of the City’s employment growth forecast over 29 years accounted for by only two recent industrial projects. These totals increase exponentially when commercial development and other industrial activity is added to the brief list of recent industrial activity above. An EIR must be prepared to include this information for analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects “in the pipeline” to determine if the proposed project will exceed the employment/population growth forecasts by SCAG and/or the City’s General Plan.

17.0 Transportation

Table T-1: Project Trip Generation provides trip generation reduction credits for “existing uses.” It is not appropriate to model the existing site utilizing ITE default rates/average rates and provide VMT and emission reduction credits based on “existing uses” that have not been proven to have the level of operations in accordance with these default rates. This does not provide the most accurate picture practically possible of the project’s impacts pursuant to CEQA Section 15125. CEQA Guidelines Section 15125(a)(1) states that, “Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project’s impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence,” and CEQA Guidelines Section 15125(a)(3) states that, “An existing conditions baseline shall not include hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the baseline.” The MND and its appendices model the existing site as fully operational utilizing trip rates and modeling derived from software modeling defaults. The physical conditions and actual emissions/vehicle traffic counts that existed at the time of analysis are not described or discussed with meaningful supporting evidence in the MND. Utilizing emissions default rates/average rates/rates derived from software modeling defaults instead of actual traffic counts and emissions analysis at the project site during business operations serves to artificially reduce the project’s significant environmental impacts by modeling the alleged businesses onsite as more intensive than they actually were.

The MND improperly “screens out” the project from performing a project-specific VMT analysis because “the Project would generate 521 fewer ADT (without PCE) than the existing land use.”

Table T-1: Project Trip Generation shows the project will generate 521 average daily trips, which is 821 average daily trips is passenger car equivalents. The MND provides trip reduction credits for “existing land uses” utilizing ITE default rates in an effort to artificially appease the City’s Traffic Impact Analysis Guidelines⁹ that exempts projects generating less than 110 ADT from providing a complete VMT analysis.

The City’s Guidelines state that:

“3.2.2 Small Projects: “Daily trips” shall be the unadjusted driveway, i.e., gross weekday trips calculated for the proposed project, based on the most current ITE Trip Generation Manual.”

The MND has adjusted the project’s total ADT by subtracting the alleged existing vehicle trips from the total. The MND does not provide any meaningful evidence to support the conclusion that the land uses on the project site operate at vehicle trip rates that are exactly the same as the ITE defaults. This does not comply with the legislative intent of SB 743 and does not comply with CEQA’s requirements for meaningful disclosure. The project does not meet any screening threshold in the City’s guidelines and a project-specific VMT analysis analysis is required and must be included as part of an EIR.

This is especially vital as the operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed distribution facility, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as a distribution facility, which will drastically increase project-generated VMT. The project’s truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. An EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity.

The MND has not adequately analyzed the project’s potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project’s potential to result in inadequate emergency access. The MND states that, “Design of the Project, including the internal private roadway, ingress, egress, and other streetscape changes are subject to the City’s development standard,” in order to conclude the project will have less than significant impacts, but has not listed the City’s development standards or demonstrated that the project meets the requirements. Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA’s

⁹ Torrance Traffic Impact Analysis Guidelines
<https://www.torranceca.gov/home/showpublisheddocument/63027/637539099775370000>

requirement for meaningful disclosure and adequate informational documents. An EIR must be prepared for the proposed project with truck turning exhibits and emergency access exhibits and associated analysis in order to provide an adequate and accurate environmental analysis.

Several areas of conflict exist for passenger cars and trucks/trailers. For example, the Site Plan depicts passenger car parking stalls within the truck/trailer loading dock court. These parking stalls may be in use at any time and conflict with truck/trailer maneuvering. There are no exhibits analyzing if the available space between the truck/trailer loading docks and the passenger car parking stalls is adequate to accommodate both types of vehicles. Figure 5: Conceptual Site Plan depicts a truck/trailer turning into the project site at the driveway adjacent to the 2-story office area, and the truck/trailer does not have adequate maneuvering space as the modeling lines overlap with the proposed curb lines.

There are also no exhibits depicting emergency vehicle access. The MND states that, “The construction permitting process would provide adequate and safe circulation to, from, and through the Project area, and would provide routes for emergency responders to access different portions of the Project area. Because the Project is required to comply with all applicable City codes, as verified by the City potential impacts related to inadequate emergency access would be less than significant.” Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA’s requirement for meaningful disclosure and adequate informational documents. An EIR must be prepared for the proposed project with truck turning exhibits and emergency access exhibits and associated analysis in order to provide an adequate and accurate environmental analysis.

Additionally, the MND has not provided any analysis of the available horizontal and vertical sight distance at the intersection of the project driveways and adjacent streets. Sight distance is the continuous length of street ahead visible to the driver. At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. An EIR must be prepared with a sight distance analysis based on the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance requirements.

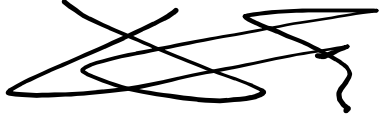
Conclusion

For the foregoing reasons, GSEJA believes the MND is flawed and an EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all

Leo Oorts
June 7, 2024
Page 8

communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

Sincerely,

A handwritten signature in black ink, appearing to be 'Gary Ho', with a stylized, scribbled end.

Gary Ho
Blum, Collins & Ho LLP

Attachments:

1. SWAPE Technical Analysis



Technical Consultation, Data Analysis and
Litigation Support for the Environment

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June 4, 2024

Gary Ho
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707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

Subject: Comments on the 205th Industrial Street Project (SCH No. 2024050384)

Dear Mr. Ho,

We have reviewed the Initial Study/Mitigated Negative Declaration (“IS/MND”) for the 205th Industrial Street Project (“Project”) located in the City of Torrance (“City”). The Project proposes to demolish the existing buildings and construct an approximately 132,425-square-foot (“SF”) light industrial building, with approximately 20 percent used for cold storage, and 195 parking stalls on the 6.26-acre site.

Our review concludes that the IS/MND fails to adequately evaluate the Project’s air quality and greenhouse gas (“GHG”) impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. An Environmental Impact Report (“EIR”) should be prepared to adequately assess and mitigate the potential air quality and GHG impacts that the project may have on the environment.

Air Quality

Failure to Provide Complete CalEEMod Output Files

Land use development projects under the California Environmental Quality Act (“CEQA”) typically evaluate air quality impacts and calculate potential criteria air pollutant emissions using the California Emissions Estimator Model (“CalEEMod”).¹ CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but CEQA requires that such changes be

¹ “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* <https://www.aqmd.gov/calceemod/user's-guide>.

justified by substantial evidence. Once all of the values are inputted into the model, the Project’s construction and operational emissions are calculated, and “output files” are generated. These output files disclose to the reader what parameters are used in calculating the Project’s air pollutant emissions and demonstrate which default values are changed. Justifications are provided for the selected values.

According to the IS/MND, CalEEMod Version 2022.1 is relied upon to estimate Project emissions (p. 31). However, this poses a problem, as the currently available version of CalEEMod 2022.1 is described as a “soft release” which fails to provide complete output files.² Specifically, the “User Changes to Default Data” table no longer provides the quantitative counterparts to the changes to the default values (see excerpt below) (Appendix A, pp. 188):

Screen	Justification
Land Use	Total Project Site 6.26 acres with 38,293 sq ft of landscaped area
Construction: Off-Road Equipment	Site Prep & Grading Phases - Tractor/Loader/Backhoes changed to Crawler Tractor for more conservative analysis
Operations: Off-Road Equipment	5 Forklifts 9 hours per day CNG Powered
Operations: Fleet Mix	Trucks analyzed under Unrefrigerated Warehouse and Autos analyzed under Refrigerated Warehouse
Operations: Vehicle Data	4+ Axle Trucks analyzed under Unrefrigerated Warehouse with 39.9 mile trip length. 2 and 3 Axle Trucks analyzed under Office with 15.3 mile trip length.

However, previous CalEEMod Versions, such as 2020.4.0, include the specific numeric changes to the model’s default values (see example excerpt below):

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	230.00	167.00
tblConstructionPhase	PhaseEndDate	11/22/2023	8/25/2023
tblConstructionPhase	PhaseEndDate	9/27/2023	6/30/2023
tblConstructionPhase	PhaseEndDate	10/25/2023	7/28/2023
tblConstructionPhase	PhaseStartDate	10/26/2023	7/29/2023
tblConstructionPhase	PhaseStartDate	9/28/2023	7/1/2023
tblLandUse	LandUseSquareFeet	160,000.00	160,371.00
tblLandUse	LandUseSquareFeet	119,000.00	41,155.00
tblLandUse	LotAcreage	3.67	3.68
tblLandUse	LotAcreage	2.73	2.74

The output files associated with CalEEMod Version 2022.1 fail to present the exact parameters used to calculate Project emissions. To remedy this issue, the IS/MND should have provided access to the model’s “.JSON” output files, which allow third parties to review the model’s revised input parameters.³ Without access to the complete output files, including the specific numeric changes to the default values, we cannot verify that the IS/MND’s air modeling and subsequent analysis is an accurate reflection of the proposed Project. As a result, an EIR should be prepared to include an updated air

² “CalEEMod California Emissions Estimator Model Soft Release.” California Air Pollution Control Officers Association (CAPCOA), 2022, available at: <https://caleemod.com/>.

³ “Video Tutorials for CalEEMod Version 2022.1.” California Air Pollution Control Officers Association (CAPCOA), May 2022, available at: <https://www.caleemod.com/tutorials>.

quality analysis that correctly provides the complete output files for CalEEMod Version 2022.1, or includes an updated air model using an older release of CalEEMod.⁴

Unsubstantiated Input Parameters Used to Estimate Project Emissions

As previously discussed, the IS/MND relies on CalEEMod Version 2022.1 to estimate the Project’s air quality emissions and fails to provide the complete output files required to adequately evaluate model’s analysis (p. 31). Regardless, when reviewing the Project’s CalEEMod output files, provided in the Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis (“AQ & GHG Analysis”) as Appendix A to the IS/MND, we were able to identify a model input that is inconsistent with information disclosed in the IS/MND. The Project’s construction emissions may consequently be underestimated. An EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

Use of Incorrect Construction Schedule

Review of the CalEEMod output files demonstrates that the “205th Torrance Warehouse Detailed Report” model includes the following construction schedule (see excerpt below) (Appendix A, pp. 188).

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase
Demolition	Demolition	1/1/2024	1/29/2024	5.00	20.0
Site Preparation	Site Preparation	1/30/2024	2/13/2024	5.00	10.0
Grading	Grading	2/14/2024	3/13/2024	5.00	20.0
Building Construction	Building Construction	3/14/2024	1/30/2025	5.00	230
Paving	Paving	1/31/2025	2/28/2025	5.00	20.0
Architectural Coating	Architectural Coating	3/1/2025	3/29/2025	5.00	20.0

As demonstrated above, the model includes a total construction duration of 16 months, from the beginning of January 2024 to the end of March 2025. Regarding the Project’s anticipated construction schedule, the IS/MND states:

“Project construction would take approximately 10 months and includes demolition, site preparation, grading, construction of backbone infrastructure, followed by building construction, pavement, and then architectural coatings” (p. 6).

The construction schedule included in the model is therefore overestimated by 6 months. This poses a problem, as the construction emissions are improperly spread out over a longer period of time. According to the CalEEMod User’s Guide, each construction phase is associated with different emissions activities (see excerpt below).⁵

⁴ “CalEEMod Version 2020.4.0.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <http://www.aqmd.gov/caleemod/download-model>.

⁵ “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 32.

Demolition involves removing buildings or structures.

Site Preparation involves clearing vegetation (grubbing and tree/stump removal) and removing stones and other unwanted material or debris prior to grading.

Grading involves the cut and fill of land to ensure that the proper base and slope is created for the foundation.

Building Construction involves the construction of the foundation, structures and buildings.

Architectural Coating involves the application of coatings to both the interior and exterior of buildings or structures, the painting of parking lot or parking garage striping, associated signage and curbs, and the painting of the walls or other components such as stair railings inside parking structures.

Paving involves the laying of concrete or asphalt such as in parking lots, roads, driveways, or sidewalks.

By incorrectly extending the construction phase lengths, the model assumes there are a greater number of days to complete the construction activities required by the prolonged phases. As a result, there will be less construction activities required per day and, consequently, less pollutants emitted per day. Until we are able to verify the revised construction schedule, the model may underestimate the peak daily emissions associated with some phases of construction and should not be relied upon to determine Project significance.

Updated Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to more accurately estimate the Project's construction-related emissions we prepared an updated CalEEMod model, using the Project-specific information provided by the IS/MND. In our updated model, we proportionately changed the default construction phase lengths to match the proposed construction duration of 10 months.⁶

Our updated analysis estimates that the volatile organic compound ("VOC") emissions associated with Project construction exceed the applicable South Coast Air Quality Management District ("SCAQMD") threshold of 75 pounds per day ("lbs/day") (see table below).⁷

⁶ See Attachment A for construction calculations and Attachment B for updated CalEEMod model.

⁷ "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, March 2023, available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>.

SWAPE Criteria Air Pollutant Emissions	
Construction	VOC (lbs/day)
IS/MND	63.0
SWAPE	96.8
% Increase	54%
SCAQMD Threshold	75
Exceeds?	Yes

As demonstrated above, construction-related VOC emissions, as estimated by SWAPE, increase by approximately 54% and exceed the applicable SCAQMD significance threshold. Our updated modeling demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed by the IS/MND. An EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the environment.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The IS/MND estimates that the Project would generate net annual GHG emissions of 2,340 metric tons of carbon dioxide equivalents per year (“MT CO₂e/year”), which would not exceed the SCAQMD bright-line threshold of 3,000 MT CO₂e/year (see excerpt below) (p. 48, Table GHG-1).

Table GHG-1: Project Related Greenhouse Gas Annual Emissions

Category	Greenhouse Gas Emissions (Metric Tons per Year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Proposed Project				
Mobile Sources ¹	3,126	0.14	0.43	3,261
Area Sources ²	<0.01	<0.01	<0.01	<0.01
Energy Usage ³	443	0.03	<0.01	445
Water and Wastewater ⁴	59.5	0.98	0.02	91.0
Solid Waste ⁵	11.1	1.11	0.00	38.7
Refrigeration ⁶	--	--	--	117
Off-Road Equipment ⁷	129	<0.01	<0.01	130
Fire Pump & Backup Generator ⁸	11.2	<0.01	<0.01	11.2
TRU ⁹	23.52	0.00	0.00	23.52
Construction ⁸	19.37	<0.01	<0.01	19.69
Proposed Project Total Emissions	3,823	2.26	0.45	4,137
Existing Business Park				
Mobile Sources ¹	1,310	0.07	0.06	1,330
Area Sources ²	1.76	<0.01	<0.01	1.77
Energy Usage ³	376	0.03	<0.01	378
Water and Wastewater ⁴	28.5	0.66	0.02	49.6
Solid Waste ⁵	9.63	0.96		33.7
Refrigeration ⁶	--	--	--	3.75
Existing Total Emissions	1,726	1.72	0.08	1,797
Project Increase	2,097	0.54	0.37	2,340
SCAQMD Draft Threshold of Significance				3,000
Exceed Threshold?				No

The IS/MND concludes:

“As shown in Table GHG-1, the Project would increase emissions over existing conditions by 2,340 MTCO₂e per year. According to the SCAQMD, a cumulative global climate change impact would occur if the GHG emissions created from the ongoing operation of the project exceeded 3,000 MTCO₂e. The Project would be required to meet the 2022 Title 24 building standards for energy efficient lighting and appliances as well as CalGreen Standards which requires sustainable measures be taken such as the inclusion of bike racks, efficient lighting, and using trees as shade in parking lots. With the implementation of these standards, impacts related to the generation of greenhouse gas emissions through Project construction and operation would be less than significant” (p. 48).

However, the IS/MND’s analysis, as well as the subsequent less-than-significant impact conclusion, is incorrect for two reasons:

- (1) The IS/MND’s quantitative analysis relies upon an outdated threshold; and
- (2) The IS/MND’s unsubstantiated air model indicates a potentially significant impact.

1) Incorrect Reliance on an Outdated Quantitative GHG Threshold

As previously stated, the IS/MND estimates that the Project would generate net annual GHG emissions of 2,340 MT CO₂e/year, which would not exceed the SCAQMD bright-line threshold of 3,000 MT CO₂e/year (p. 48, Table GHG-1). However, the guidance that provided the 3,000 MT CO₂e/year threshold, the SCAQMD’s 2008 *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans* report, was developed when the Global Warming Solutions Act of 2006, commonly known as “AB 32”, was the governing statute for GHG reductions in California. AB 32 requires California to reduce GHG emissions to 1990 levels by 2020.⁸ Furthermore, AEP guidance states:

“[F]or evaluating projects with a post 2020 horizon, the threshold will need to be revised based on a new gap analysis that would examine 17 development and reduction potentials out to the next GHG reduction milestone.”⁹

As it is currently May 2024, thresholds for 2020 are not applicable to the proposed Project and should be revised to reflect the current GHG reduction target. The SCAQMD bright-line threshold of 3,000 MT CO₂e/year is therefore outdated and inapplicable to the proposed Project, and the IS/MND’s less-than-significant GHG impact conclusion should not be relied upon. Instead, we recommend that the Project apply the SCAQMD 2035 service population efficiency target of 3.0 metric tons of carbon dioxide

⁸ “Health & Safety Code 38550.” California State Legislature, January 2007, *available at*: https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=38550.

⁹ “Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California.” Association of Environmental Professionals (AEP), October 2016, *available at*: https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf, p. 39.

equivalents per service population per year (“MT CO₂e/SP/year”), which was calculated by applying a 40% reduction to the 2020 targets.¹⁰

2) Failure to Identify a Potentially Significant GHG Impact

In an effort to quantitatively evaluate the Project’s GHG emissions, we compared the Project’s GHG emissions, as estimated by the GHG Analysis, to the SCAQMD 2035 efficiency target of 3.0 MT CO₂e/SP/year. When applying this threshold, the Project’s incorrect and unsubstantiated air model indicates a potentially significant GHG impact.

As previously stated, the IS/MND estimates that the Project would generate net annual GHG emissions of 2,340 MT CO₂e/year (p. 48, Table GHG-1). According to CAPCOA’s *CEQA & Climate Change* report, a service population (“SP”) is defined as “the sum of the number of residents and the number of jobs supported by the project.”¹¹ According to the IS/MND, the project would support approximately 111 employees (p. 71). As the project is not expected to support any residential land uses, we estimate an SP of 111 people. When dividing the Project’s net annual GHG emissions, as estimated by the IS/MND, by an SP of 111 people, we find that the Project would emit approximately 21.1 MT CO₂e/SP/year (see table below).¹²

Project Greenhouse Gas Emissions	
Annual Emissions (MT CO ₂ e/year)	2,340
Service Population	111
Service Population Efficiency (MT CO ₂ e/SP/year)	21.1
SCAQMD 2035 Target	3.0
<i>Exceeds?</i>	Yes

As demonstrated above, the Project’s service population efficiency value exceeds the SCAQMD 2035 efficiency target of 3.0 MT CO₂e/SP/year, indicating a potentially significant impact not previously identified or addressed by the IS/MND. As a result, the IS/MND’s less-than-significant GHG impact conclusion should not be relied upon. An EIR should be prepared, including an updated GHG analysis and incorporating additional mitigation measures to reduce the Project’s GHG emissions to less-than-significant levels.

¹⁰ “Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15.” SCAQMD, September 2010, available at: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf), p. 2.

¹¹ “CEQA & Climate Change.” California Air Pollution Control Officers Association (CAPCOA), January 2008, available at: <https://www.airquality.org/LandUseTransportation/Documents/GHGThresholdsJustificationSept2014.pdf>, p. 71-72.

¹² Calculated: (1,305.7 MT CO₂e/year) / (312 service population) = (4.18 MT CO₂e/SP/year).

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project would result in potentially significant air quality and GHG impacts that should be mitigated further. In an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the proposed Project. Feasible mitigation measures can be found in the California Department of Justice Warehouse Project Best Practices document.¹³ To reduce the Project's emissions, consideration of the following measures should be made:

- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.
- Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.
- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.

¹³ "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>, p. 8 – 10.

- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.

- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation. An EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,



Matt Hagemann, P.G., C.Hg.

A handwritten signature in blue ink that reads "Paul Rosenfeld". The signature is written in a cursive style.

Paul E. Rosenfeld, Ph.D.

Attachment A: Updated Construction Calculations
Attachment B: SWAPE's CalEEMod Output Files
Attachment C: Matt Hagemann CV
Attachment D: Paul Rosenfeld CV

Construction Schedule Calculations					
Phase	Default Phase Length	Construction Duration	%	Construction Duration	Revised Phase Length
Demolition	20	453	0.0442	304	13
Site Preparation	10	453	0.0221	304	7
Grading	20	453	0.0442	304	13
Construction	230	453	0.5077	304	154
Paving	20	453	0.0442	304	13
Architectural Coating	20	453	0.0442	304	13

	Total Default Construction Duration	Revised Construction Duration
Start Date	1/1/2024	1/1/2024
End Date	3/29/2025	10/31/2024
Total Days	453	304

205th Torrance Warehouse - Construction Only Custom Report

Table of Contents

- 1. Basic Project Information
 - 1.1. Basic Project Information
 - 1.2. Land Use Types
 - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
- 2. Emissions Summary
 - 2.1. Construction Emissions Compared Against Thresholds
 - 2.2. Construction Emissions by Year, Unmitigated
- 3. Construction Emissions Details
 - 3.1. Demolition (2024) - Unmitigated
 - 3.3. Site Preparation (2024) - Unmitigated
 - 3.5. Grading (2024) - Unmitigated
 - 3.7. Building Construction (2024) - Unmitigated
 - 3.9. Paving (2025) - Unmitigated
 - 3.11. Architectural Coating (2025) - Unmitigated

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

- 5.7. Construction Paving
- 5.8. Construction Electricity Consumption and Emissions Factors
- 5.18. Vegetation
 - 5.18.1. Land Use Change
 - 5.18.1.1. Unmitigated
 - 5.18.1. Biomass Cover Type
 - 5.18.1.1. Unmitigated
 - 5.18.2. Sequestration
 - 5.18.2.1. Unmitigated
- 8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	205th Torrance Warehouse - Construction Only
Construction Start Date	1/1/2024
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.50
Precipitation (days)	17.4
Location	33.84623517696592, -118.32484724510334
County	Los Angeles-South Coast
City	Torrance
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4669
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.24

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	95.9	1000sqft	2.20	95,940	18,351	—	—	—

Refrigerated Warehouse-No Rail	26.5	1000sqft	0.61	26,485	4,404	—	—	—
Parking Lot	2.34	Acre	2.34	0.00	14,298	—	—	—
General Office Building	10.0	1000sqft	0.23	10,000	1,223	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.88	0.76	4.29	19.5	0.03	0.13	0.90	1.03	0.12	0.22	0.34	—	3,869	3,869	0.16	0.14	4.94	3,920
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	96.8	96.8	5.56	29.4	0.05	0.19	22.0	22.1	0.18	10.4	10.5	—	5,527	5,527	0.23	0.20	0.13	5,548
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.48	3.48	2.23	9.99	0.02	0.07	1.13	1.20	0.06	0.42	0.49	—	2,006	2,006	0.08	0.07	0.97	2,030
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.64	0.64	0.41	1.82	< 0.005	0.01	0.21	0.22	0.01	0.08	0.09	—	332	332	0.01	0.01	0.16	336

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.88	0.76	4.29	19.5	0.03	0.13	0.90	1.03	0.12	0.22	0.34	—	3,869	3,869	0.16	0.14	4.94	3,920	
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.93	0.83	5.56	29.4	0.05	0.19	22.0	22.1	0.18	10.4	10.5	—	5,527	5,527	0.23	0.20	0.13	5,548	
2025	96.8	96.8	2.45	11.5	0.01	0.10	0.20	0.30	0.10	0.05	0.14	—	1,708	1,708	0.07	0.02	0.02	1,716	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.43	0.37	2.23	9.99	0.02	0.07	1.13	1.20	0.06	0.42	0.49	—	2,006	2,006	0.08	0.07	0.97	2,030	
2025 ¹⁰ Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.08	0.07	0.41	1.82	< 0.005	0.01	0.21	0.22	0.01	0.08	0.09	—	332	332	0.01	0.01	0.16	336	
2025	0.64	0.64	0.02	0.09	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	11.7	11.7	< 0.005	< 0.005	< 0.005	11.8	

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

205th Torrance Warehouse - Construction Only Custom Report, 6/3/2024

Off-Road Equipment	0.86	0.76	5.47	18.4	0.03	0.19	0.19	0.18	—	0.18	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	0.00	0.00	0.00	0.00	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.19	0.65	< 0.005	0.01	0.01	0.01	—	0.01	—	122	122	< 0.005	< 0.005	—	122
Demolition	—	—	—	—	—	0.00	0.00	0.00	0.00	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.04	0.12	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	—	20.2	20.2	< 0.005	< 0.005	—	20.3
Demolition	—	—	—	—	—	—	—	0.00	0.00	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.08	0.96	0.00	0.00	0.20	0.05	0.05	0.00	—	201	201	0.01	0.01	0.02	203
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.26	7.26	< 0.005	< 0.005	0.01	7.36
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.20	1.20	< 0.005	< 0.005	< 0.005	1.22
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	0.50	2.59	28.3	0.05	0.10	—	0.10	0.10	—	0.10	—	5.293	5,293	0.21	0.04	—	5,311
Dust From Material Movement:	—	—	—	—	—	—	21.8	21.8	—	10.3	10.3	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.54	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	102	102	< 0.005	< 0.005	—	102

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
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3.5. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.38	0.37	2.22	17.8	0.03	0.08	—	0.08	0.08	—	0.08	—	2.956	2,956	0.12	0.02	—	2,967	
Dust From Material Movement:	—	—	—	—	—	—	8.68	8.68	—	3.60	3.60	—	—	—	—	—	—	—	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Off-Road Equipment	0.01	0.01	0.08	0.63	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	105	105	< 0.005	< 0.005	—	106	
Dust From Material Movement:	—	—	—	—	—	—	0.31	0.31	—	0.13	0.13	—	—	—	—	—	—	—	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Off-Road Equipment	< 0.005	< 0.005	0.01	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	17.4	17.4	< 0.005	< 0.005	—	17.5	

Vegetatio	TOG	ROG	NOX	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOX	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOX	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Grading	Crawler Tractors	Diesel	Tier 4 Final	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Tier 4 Final	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 4 Final	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Tier 4 Final	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 4 Final	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

8

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT

Grading	—	—	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2		
Grading	Vendor	—	10.2	HHDT,MHDT		
Grading	Hauling	15.2	20.0	HHDT		
Grading	Onsite truck	—	—	HHDT		
Building Construction	—	—	—	—		
Building Construction	Worker	54.6	18.5	LDA,LDT1,LDT2		
Building Construction	Vendor	21.7	10.2	HHDT,MHDT		
Building Construction	Hauling	0.00	20.0	HHDT		
Building Construction	Onsite truck	—	—	HHDT		
Paving	—	—	—	—		
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2		
Paving	Vendor	—	10.2	HHDT,MHDT		
Paving	Hauling	0.00	20.0	HHDT		
Paving	Onsite truck	—	—	HHDT		
Architectural Coating	—	—	—	—		
Architectural Coating	Worker	10.9	18.5	LDA,LDT1,LDT2		
Architectural Coating	Vendor	—	10.2	HHDT,MHDT		
Architectural Coating	Hauling	0.00	20.0	HHDT		
Architectural Coating	Onsite truck	—	—	HHDT		

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	198,638	66,213	6,116

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	—
Site Preparation	—	—	24.5	0.00	—
Grading	1,579	—	32.5	0.00	—
Paving	0.00	0.00	0.00	0.00	2.34

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Refrigerated Warehouse-No Rail	0.00	0%
Parking Lot	2.34	100%
General Office Building	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	532	0.03	< 0.005

2025	0.00	532	0.03	< 0.005
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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88

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Proportionately altered individual construction phase lengths to match the proposed construction duration of 10 months.
Construction: Off-Road Equipment	Equipment unit amount and Tier 4 Final consistent with the IS/MND's model.
Construction: Dust From Material Movement	Consistent with the IS/MND's model.



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**Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review**

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.

B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist

California Certified Hydrogeologist

Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nationwide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, *Oxygenates in Water: Critical Information and Research Needs*.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.

- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukunaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.



Technical Consultation, Data Analysis and
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Paul Rosenfeld, Ph.D.

Principal Environmental Chemist

Chemical Fate and Transport & Air Dispersion Modeling

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H₂O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution*. **233**, 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermol and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

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Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

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Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

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Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

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Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

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Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. *The 23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florida, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference Orlando, FL*.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

Rosenfeld, P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

Rosenfeld, P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 2010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruele vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a
AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido” Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosiences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilbert, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeannette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009



Green Jobs & Clean Communities
P.O. Box 79222
Corona, CA 92877

January 10, 2025

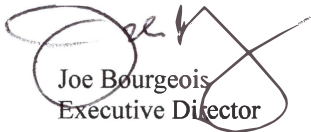
Leo Oorts
Planning Manager
City of Torrance
cddinfo@torranceca.gov

Re: 205th Street Industrial Project MND (SCH NO. 2024050384)

Dear Mr. Oorts:

On behalf of the Golden State Environmental Justice Alliance (“GSEJA”), I am writing to you regarding the 205th Street Industrial Project MND (SCH NO. 2024050384) (“Project”).

GSEJA is withdrawing its comment letter, appeal, and/or opposition on/to the Project. The Project’s developer has addressed GSEJA’s concerns about environmental mitigation.


Joe Bourgeois
Executive Director

AGENDA ITEM NO. 8C

DATE: April 16, 2025

TO: Planning Commission

FROM: Leo Oorts, Senior Planner

SUBJECT: 2550 Pacific Coast Highway
Modification (MOD23-00010)
Minor Hillside Exemption (MHE23-00050)

Consideration of Modification for a previously approved Division of Lot (DIV14-00006) to amend an open space easement (Note A), in conjunction with a Minor Hillside Exemption for the construction of ground-mounted solar panels and associated equipment, on property located within the Hillside Overlay in the P-1 Zone at 2550 Pacific Coast Highway.

RECOMMENDATION

Recommendation of the Community Development Director that Planning Commission conduct a public hearing and consider adoption of Resolution Nos. 23-079 and 23-080 for the denial of a Modification of a previously approved Division of Lot (DIV14-00006) to amend an open space easement (Note A), in conjunction with the denial of a Minor Hillside Exemption for the construction of ground-mounted solar panels and associated equipment, on property located within the Hillside Overlay in the P-1 Zone at 2550 Pacific Coast Highway, and determine a Statutory Exemption for denial of the project in accordance with Guidelines for Implementation of the California Environmental Quality Act (CEQA); Article 18, Section 15270 (Projects Which Are Disapproved).

EXECUTIVE SUMMARY

The project applicant, JWG Consulting (Saunders Property Company), requests approval by the Planning Commission to modify a previously approved Division of Lot (DIV14-00006) and to allow the construction of ground-mounted solar panels and associated equipment on property located within the Hillside Overlay in the P-1 Zone at 2550 Pacific Coast Highway.

The development standards of the Torrance Municipal Code (TMC) are applicable to the project, and therefore require discretionary review and approval of the following entitlements:

- Modification (MOD) to amend a previously approved Division of Lot (DIV14-00006) pertaining to an open space easement (Note A); and
- Minor Hillside Exemption (MHE) to allow new construction below 14’ in height.

Staff has reviewed the project and determined it is consistent with the development standards for ground-mounted solar panels. However, in the judgement of staff, the project conflicts with the intent of the open space easement and is deemed not consistent with the PUB land use designation and policies to preserve, protect, and maintain open space. Additionally, the project is deemed not consistent with the planning and design provisions of the Hillside Overlay. Therefore, staff recommends denial of the project in its entirety. The balance of this report provides an overview of the project.

DISCUSSION

Background

In 2023, a development application was filed by JWG Consulting (Saunders Property Company) for the construction of ground-mounted solar panels and associated equipment on the project site. At that time of application filing, the Torrance Municipal Code did not contain a permitting process nor development standards for roof-top and ground-mounted solar energy systems (solar panels). In order to proceed with

the application filing, staff recognized there was a need to codify provisions for solar energy systems. In February 2025, the City Council adopted amendments to the Torrance Municipal Code via Ordinance No. 3944 that established a permitting process and development standards for solar energy systems. As a result, solar energy systems are now permitted in all zones provided that such installation complies with the height and setback requirements of the zone where such property is located. In this case, the project requires discretionary review by the Planning Commission to determine that such project complies with the planning and design provisions of the Hillside Overlay.

Environmental Determination

The proposed construction of ground-mounted solar panels and associated equipment is categorized as a new small structure or facility located on undeveloped land within an urbanized area. The denial of a project is deemed Statutorily Exempt per CEQA Guidelines; Article 18, Section 15270 (Projects Which Are Disapproved).

General Plan Land Use Designation

The project site has a General Plan land use designation of Public/Quasi-Public/Open Space (PUB), which provides for open space, land owned by public agencies and jurisdictions, and land owned by private entities for uses which serve the community, such as utilities. A policy objective of the PUB land use designation is to preserve, protect, and maintain open space, parks, and recreation facilities as desirable land uses, recognizing that such uses contribute to the high quality of life in Torrance (Land Use Policy 9.1). The PUB land use designation is implemented by the Open Area – Planting – Parking District (P-1 Zone) and the Public Use District (P-U Zone).

Zoning Designation

The project site has a zoning designation of Open Area – Planting – Parking District (P-1 Zone) and Hillside Overlay, which allow landscaping, parks and recreation, and the development of parking lots subject to discretionary approval. In accordance with the Torrance Municipal Code, ground-mounted solar panels and associated equipment are permitted within the P-1 Zone and the Hillside Overlay, provided that such installation complies with the setback requirements and the height limits of the P-1 Zone as well as compliance with the planning and design provisions of the Hillside Overlay.

Staff notes the P-1 Zone does not identify setback requirements nor height limits, however, the Hillside Overlay does establish a discretionary review process to ensure a project has been planned and designed in harmony with other properties in the vicinity and that such project does not have the potential to result in a substantial adverse impact on the view, light, air, and privacy of other properties in the vicinity, among other considerations.

Adjacent Land Uses and Zoning Designations

The project site is located on undeveloped land at the southern portion of the Skyline Mobile Home Park and bounded by different land uses that are consistent with various zoning designations (Attachment 2). To the north are mobile homes, to the east are single family residences and a golf course located within the City of Rolling Hills Estates, to the south is Alta Loma Park, and to the west are single family residences.

NORTH:	R1-PP	Hillside Overlay	Mobile Homes (Skyline Mobile Home Park)
SOUTH:	PU	Hillside Overlay	Public Park (Alta Loma Park)
EAST:			Single Family Residences (City of Rolling Hills Estates)
WEST:	R-1	Hillside Overlay	Single Family Residences

Existing Site Improvements and Natural Features

The project site is located on undeveloped land at the southern portion of the Skyline Mobile Home Park, atop a slope and north of Alta Loma Park (public park). The project site is irregular shaped and measures approximately 3.99 acres, in which approximately 1.5 acres would be developed with ground-mounted solar panels and associated equipment including perimeter fencing. The project site contains seasonal grasses and native shrubs and features a gentle slope from southwest to northeast, followed by a steep

slope and canyon that descend approximately 70' to the mobile home park situated below. Scenic views of the Los Angeles basin and surrounding mountains are observed from the project site due to its elevation and topography. No candidate, sensitive or special status species are known to occupy the project site as per the Community Resources Element of the General Plan. Aerial imagery dating to 2000 shows the project site has historically remained undeveloped. Access to the project site is solely through a secured gate at Alta Loma Park via Delos Drive, with no direct internal access to the mobile home park.

Staff notes the project site is recognized as a portion of the mobile home park, albeit undeveloped, and is subject to the jurisdiction of the California Department of Housing and Community Development (HCD) for the issuance of building permits, health and safety, property maintenance, among other regulations.

Division of Lot (DIV14-00006)

In 2014, the Planning Commission approved a Division of Lot (DIV14-00006) to allow a consolidation of multiple parcels into one parcel for the Skyline Mobile Home Park. The consolidation resulted in one parcel measuring 36.81 acres and included the placement of an open space easement on 3.99 acres of undeveloped land at the southern portion of the mobile home park, north of Alta Loma Park. The open space easement was required by the City of Torrance in relation to the Chandler/Rolling Hills Country Club Project, which involved a land swap between the City of Torrance and the City of Rolling Hills Estates. Although the open space easement was recorded without terms specified, such as a timespan and a classification of open space, it is generally understood that such easement remains in perpetuity and serves a restriction, through limitation of future use, to preserve the historical, natural, and scenic character of the undeveloped land in accordance with the P-1 Zone and the PUB land use designation, and may have served to protect people and private property from potential natural hazards caused by the steep slope and canyon.

Modification to Parcel Map No. 72793

The project involves a modification to the open space easement, identified as Note A on Parcel Map No. 72793, by adding language that would allow the use of solar panels and associated equipment including the installation of perimeter fencing (Attachment 4). Approval of the modification would confer the right to proceed with the project in compliance with local standards that pertain to ground-mounted solar panels and fencing, and subject to review by HCD for the issuance of building permits.

As mentioned, although the open space easement was recorded without terms specified, it is generally understood that such easement remains in perpetuity to preserve the historical, natural, and scenic character of the undeveloped land in accordance with the P-1 Zone and the PUB land use designation, and may have served to protect people and private property from potential natural hazards caused by the steep slope and canyon. In the judgment of staff, the proposed modification conflicts with the intent of the open space easement and is deemed not consistent with the PUB land use designation and policies to preserve, protect, and maintain open space.

Ground-Mounted Solar Panels

In conjunction with the proposed modification, the project involves the construction of ground-mounted solar panels with associated equipment and perimeter fencing (Attachment 4). The solar panels are situated within an irregular shaped area that measures approximately 1.5 acres, atop the slope and north of Alta Loma Park. The solar energy system contains 712 panels that are angled toward the south and positioned east to west across 12 parallel rows and provide a 10' setback to the nearest property line. The project design features a low height ground-mounted installation with the topmost portion of the solar panels extending 2' 4" above the ground surface, and a new chain link fence measuring 2' 6" in height along the site perimeter atop the slope. According to the project applicant, other installations for associated equipment and conduit would be located down slope near the mobile homes.

Staff notes the project plans do not identify the location of associated equipment located near the mobile homes nor access to the project site from Alta Loma Park. Additionally, the project plans do not identify any changes to grade elevation that may result from site preparation activities for the installation of ground-mounted solar panels.

Hillside Overlay

In accordance with Article 41, Chapter 1, Division 9 of the Torrance Municipal Code, the Planning Commission is required to make a series of findings relating to the planning and design of the project and its potential to have a substantial adverse impact on other properties in the vicinity. To determine a project does not have the potential to impact other properties in the vicinity and there is no significant public controversy thereon, notices of the public hearing were mailed on March 13, 2025, to the registered owner of properties located within a 500' radius of the exterior boundaries of the project site. The notices provide a brief project description, contact information, availability to review the project plans, and information related to the public hearing date, time, location, etc. As of the preparation of this report, several comment letters have been received that express concerns related to the project (Attachment 3).

Staff notes that public notices for the project were previously mailed on November 2, 2023, and February 27, 2025, but the matter was continued on both occasions after an error was discovered with the notices. On those occasions, two comment letters were received from the property owners at 26102 Crest Road and 25940 Richville Drive that expressed concerns related to the project. Since then, correct notices were mailed on March 13, 2025, and as of the preparation of this report those same comment letters were resubmitted, in addition to new comment letters being received. Among the comments received, concerns raised include potential impacts to view and project harmony with other residences in the vicinity, as well as comments related to noise and soil stability. Staff notes comments related to view and harmony are evaluated based on the planning and design provisions of the Hillside Overlay as listed in Section 91.41.6 of the Torrance Municipal Code. Noise concerns are not evaluated in the Hillside Overlay. Comments related to soil stability would be evaluated by HCD as the permitting agency for the mobile home park.

In 2023, staff conducted a field assessment with the purpose of conducting outreach, sharing the project plans, and for consideration of potential substantial adverse impacts on other properties in the vicinity. Field assessments were conducted on properties located to the west adjacent to the project site at 26102 Crest Road and 25940 Richville Drive. Field assessments were not conducted from other properties along Crest Road nor elsewhere on Richville Drive due to their distance away from the project site and, in the judgement of staff, the unlikelihood to have a substantial adverse impact. In addition, field assessments were not conducted from the mobile home park located down slope from the project site.

During the field assessment, staff made observations from the rear yard with a direct view of the project site at the forefront and an unobstructed scenic view of the Los Angeles basin and the surrounding mountains on the horizon toward the northeast. In the judgment of staff, based on observations made from the rear yard, the project does not have the potential to result in a substantial adverse impact to view of the Los Angeles basin nor the surrounding mountains. The project design features a low height ground-mounted installation with the topmost portion of the solar panels extending 2' 4" above the ground surface, and a new chain link fence measuring 2' 6" in height along the site perimeter atop the slope, therefore limiting the potential to obstruct views. However, in the judgment of staff, the project does not provide an orderly and attractive development in harmony with other properties in the vicinity, specifically the single family residences to the west, due to the project scale at approximately 1.5 acres on undeveloped land and conflict with the intent of the open space easement as well as the historical, natural, and scenic character of the project site.

CONCLUSION

Staff has reviewed the project and determined it is consistent with the development standards for ground-mounted solar panels for the P-1 Zone. However, in the judgement of staff, the project conflicts with the intent of the open space easement and is deemed not consistent with the PUB land use designation and policies to preserve, protect, and maintain open space. Although the open space easement was recorded without terms specified, such as a timespan and a classification of open space, it is generally understood that such easement remains in perpetuity to preserve the historical, natural, and scenic character of the undeveloped land and may have served to protect people and private property from potential natural hazards caused by the steep slope and canyon. Additionally, the project is deemed not consistent with

the planning and design provisions of the Hillside Overlay. Although the project does not have the potential to result in a substantial adverse impact to view of the Los Angeles basin nor the surrounding mountains, the project would not provide an orderly and attractive development in harmony with other properties in the vicinity, specifically the single family residences to the west, due to the project scale at approximately 1.5 acres on undeveloped land and conflict with the intent of the open space easement as well as the historical, natural, and scenic character of the project site. For these reasons, staff recommends denial of the project in its entirety.

FINDINGS OF FACT

Staff has prepared draft findings for consideration by the Planning Commission that are listed in the attached Resolutions (Attachment 1).

PUBLIC NOTICE

In accordance with the Torrance Municipal Code, notices of the public hearing were made no less than 10 calendar days before the Planning Commission meeting. Notices were also posted at the project site and were mailed on March 13, 2025, to the registered owner of properties located within a 500' radius of the exterior boundaries of the project site. Notices were also published in the local newspaper (The Daily Breeze) and posted on the City of Torrance webpage.

RIGHT OF APPEAL

In accordance with Torrance Municipal Code Section 96.2.5, decisions made by the Planning Commission may be appealed to the City Council within 15 calendar days of adoption of the Resolutions. For more information, please contact the City Clerk's Office by telephone at (310) 618-2870 or email at CityClerk@TorranceCA.Gov.

PROJECT PLANS

The project plans and all related documents are readily available for public review at the Permit Center (Planning Counter) located at City Hall, 3031 Torrance Boulevard, Torrance CA 90503, during normal business hours open 8:00am to 5:00pm, Monday through Thursday, open alternate Fridays. Appointments are available by contacting the Planning Division at (310) 618-5990.

ATTACHMENTS

1. Resolution Nos. 23-079, 23-080
2. Location and Zoning Map
3. Correspondence
4. Project Plans

ITEM 8C
ATTACHMENT 1

Resolution Nos. 23-079, 23-080

PLANNING COMMISSION RESOLUTION NO. 23-079

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF TORRANCE, CALIFORNIA, AS PROVIDED FOR IN DIVISION 9, CHAPTER 2, ARTICLE 28 AND DIVISION 9, CHAPTER 2, ARTICLE 29 OF THE TORRANCE MUNICIPAL CODE, FOR THE DENIAL OF A MODIFICATION OF A PREVIOUSLY APPROVED DIVISION OF LOT (DIV14-00006), ON PROPERTY LOCATED WITHIN THE HILLSIDE OVERLAY IN THE P-1 ZONE AT 2550 PACIFIC COAST HIGHWAY.

MOD23-00010: JWG CONSULTING (SAUNDERS PROPERTY COMPANY)

WHEREAS, the Planning Commission of the City of Torrance conducted a duly noticed public hearing on April 16, 2025 to consider an application filed by JWG Consulting (Saunders Property Company) for the consideration of a Modification of a previously approved Division of Lot (DIV14-00006) to amend an open space easement (Note A), in conjunction with a Minor Hillside Exemption for the construction of ground-mounted solar panels and associated equipment, on property located within the Hillside Overlay in the P-1 Zone at 2550 Pacific Coast Highway; and

WHEREAS, due and legal publication of notice was given to owners of property in the vicinity thereof and due and legal hearings have been held, all in accordance with the provisions of Division 9, Chapter 1, Article 41, and Division 9, Chapter 2, Article 28 and Division 9, Chapter 2, Article 29 of the Torrance Municipal Code; and

WHEREAS, the Planning Commission of the City of Torrance does hereby find and determine as follows:

- a) That the project site is located on undeveloped land atop a slope and north of Alta Loma Park (public park) at the southern portion of Skyline Mobile Home Park at 2550 Pacific Coast Highway;
- b) That the project site is described as “BEING A SUBDIVISION OF PORTION OF LOTS 2 AND 4 OF TRACT NO. 9765, AS PER MAP RECORDED IN BOOK 170, PAGES 10 THROUGH 12, INCLUSIVE OF MAPS AND PORTION OF LOTS 140, 141, 142, 153, AND 154 OF TRACT NO. 15, AS PER RECORDED IN BOOK 12, PAGE 189 OF MAPS” in the Office of the Los Angeles County Recorder, State of California;
- c) That the project, together with provisions for its design and improvement, is deemed not consistent with the General Plan land use designation of Public/Quasi-Public/Open Space (PUB), which provides for open space, land owned by public agencies and jurisdictions, and land owned by private entities for uses which serve the community, such as utilities. In addition, the project is deemed not consistent with Land Use Policy 9.1 to preserve, protect, and maintain open space, parks, and recreation facilities as desirable land uses, recognizing that such uses contribute to the high quality of life in Torrance;
- d) That the project is permitted by right in the Open Area – Planting – Parking District (P-1 Zone), however, is subject to discretionary review for compliance with the planning and design provisions of the Hillside Overlay. As such, the project is deemed not consistent with the planning and design provisions of the Hillside Overlay and would not provide an orderly and attractive development in harmony with other properties in the vicinity, specifically the single family residences to the west, due to the project scale at approximately 1.5 acres on undeveloped land and conflict with the intent of the open space easement as well as the historical, natural, and scenic character of the project site;
- e) That the site is not suitable for the project and may interfere with the orderly development of the City as provided for in the Official Land Use Plan because the project is deemed not consistent with the PUB land use designation and policies to preserve, protect, and maintain open space. In addition, although the open space easement was recorded without terms specified, such as a timespan and

a classification of open space, it is generally understood that such easement remains in perpetuity to preserve the historical, natural, and scenic character of the undeveloped land and may have served to protect people and private property from potential natural hazards caused by the steep slope and canyon. Additionally, the project is deemed not consistent with the planning and design provisions of the Hillside Overlay due to the project scale at approximately 1.5 acres on undeveloped land and conflict with the intent of the open space easement as well as the historical, natural, and scenic character of the project site;

- f) That the denial of the project is deemed Statutorily Exempt per the Guidelines for Implementation of the California Environmental Quality Act (CEQA); Article 18, Section 15270 (Projects Which Are Disapproved); and

WHEREAS, the Planning Commission of the City of Torrance by the following roll call vote **DENIED** MOD23-00010, as follows:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS:

ABSENT: COMMISSIONERS:

ABSTAIN: COMMISSIONERS:

NOW, THEREFORE, BE IT RESOLVED that MOD23-00010 filed by JWG Consulting (Saunders Property Company) for the consideration of a Modification of a previously approved Division of Lot (DIV14-00006) to amend an open space easement (Note A), in conjunction with a Minor Hillside Exemption for the construction of ground-mounted solar panels and associated equipment, on property located within the Hillside Overlay in the P-1 Zone at 2550 Pacific Coast Highway, on file in the Community Development Department of the City of Torrance, is hereby **DENIED**.

INTRODUCED and **ADOPTED** at the regular meeting of the Planning Commission of the City of Torrance held on the 16th day of April 2025.

ATTEST:

Secretary, Torrance Planning Commission

Chairman, Torrance Planning Commission

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss
CITY OF TORRANCE)

I, ROBERT GARCIA, Secretary to the Planning Commission of the City of Torrance, California, do hereby certify that the foregoing resolution was duly introduced and adopted by the Planning Commission of the City of Torrance at a regular meeting of said Commission held on the 16th day of April 2025, by the following roll call vote:

- AYES: COMMISSIONERS:
- NOES: COMMISSIONERS:
- ABSENT: COMMISSIONERS:
- ABSTAIN: COMMISSIONERS:

Secretary, Torrance Planning Commission

PLANNING COMMISSION RESOLUTION NO. 23-080

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF TORRANCE, CALIFORNIA, AS PROVIDED FOR IN DIVISION 9, CHAPTER 1, ARTICLE 41 OF THE TORRANCE MUNICIPAL CODE, FOR THE DENIAL OF A MINOR HILLSIDE EXEMPTION, ON PROPERTY LOCATED WITHIN THE HILLSIDE OVERLAY IN THE P-1 ZONE AT 2550 PACIFIC COAST HIGHWAY.

MHE23-00050: JWG CONSULTING (SAUNDERS PROPERTY COMPANY)

WHEREAS, the Planning Commission of the City of Torrance conducted a duly noticed public hearing on April 16, 2025 to consider an application filed by JWG Consulting (Saunders Property Company) for the consideration of a Modification of a previously approved Division of Lot (DIV14-00006) to amend an open space easement (Note A), in conjunction with a Minor Hillside Exemption for the construction of ground-mounted solar panels and associated equipment, on property located within the Hillside Overlay in the P-1 Zone at 2550 Pacific Coast Highway; and

WHEREAS, due and legal publication of notice was given to owners of property in the vicinity thereof and due and legal hearings have been held, all in accordance with the provisions of Division 9, Chapter 1, Article 41, and Division 9, Chapter 2, Article 28 and Division 9, Chapter 2, Article 29 of the Torrance Municipal Code; and

WHEREAS, the Planning Commission of the City of Torrance does hereby find and determine as follows:

- a) That the project site is located on undeveloped land atop a slope and north of Alta Loma Park (public park) at the southern portion of Skyline Mobile Home Park at 2550 Pacific Coast Highway;
- b) That the project site is described as "BEING A SUBDIVISION OF PORTION OF LOTS 2 AND 4 OF TRACT NO. 9765, AS PER MAP RECORDED IN BOOK 170, PAGES 10 THROUGH 12, INCLUSIVE OF MAPS AND PORTION OF LOTS 140, 141, 142, 153, AND 154 OF TRACT NO. 15, AS PER RECORDED IN BOOK 12, PAGE 189 OF MAPS" in the Office of the Los Angeles County Recorder, State of California;
- c) That the project is deemed not consistent with the planning and design provisions of the Hillside Overlay and the design of the project would not provide an orderly and attractive development in harmony with other properties in the vicinity, specifically the single family residences to the west, due to the project scale at approximately 1.5 acres on undeveloped land and conflict with the intent of the open space easement as well as the historical, natural, and scenic character of the project site. In addition, the project is deemed not consistent with the General Plan land use designation of Public/Quasi-Public/Open Space (PUB), which provides for open space, land owned by public agencies and jurisdictions, and land owned by private entities for uses which serve the community, such as utilities. Additionally, the project is deemed not consistent with Land Use Policy 9.1 to preserve, protect, and maintain open space, parks, and recreation facilities as desirable land uses, recognizing that such uses contribute to the high quality of life in Torrance;
- d) That the denial of the project is deemed Statutorily Exempt per the Guidelines for Implementation of the California Environmental Quality Act (CEQA); Article 18, Section 15270 (Projects Which Are Disapproved); and

WHEREAS, the Planning Commission of the City of Torrance by the following roll call vote **DENIED** MHE23-00050, as follows:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS:

ABSENT: COMMISSIONERS:

ABSTAIN: COMMISSIONERS:

NOW, THEREFORE, BE IT RESOLVED that MHE23-00050 filed by JWG Consulting (Saunders Property Company) for the consideration of a Minor Hillside Exemption for the construction of ground-mounted solar panels and associated equipment, in conjunction with a Modification of a previously approved Division of Lot (DIV14-00006) to amend an open space easement (Note A), on property located within the Hillside Overlay in the P-1 Zone at 2550 Pacific Coast Highway, on file in the Community Development Department of the City of Torrance, is hereby **DENIED**.

INTRODUCED and **ADOPTED** at the regular meeting of the Planning Commission of the City of Torrance held on the 16th day of April 2025.

ATTEST:

Secretary, Torrance Planning Commission

Chairman, Torrance Planning Commission

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss
CITY OF TORRANCE)

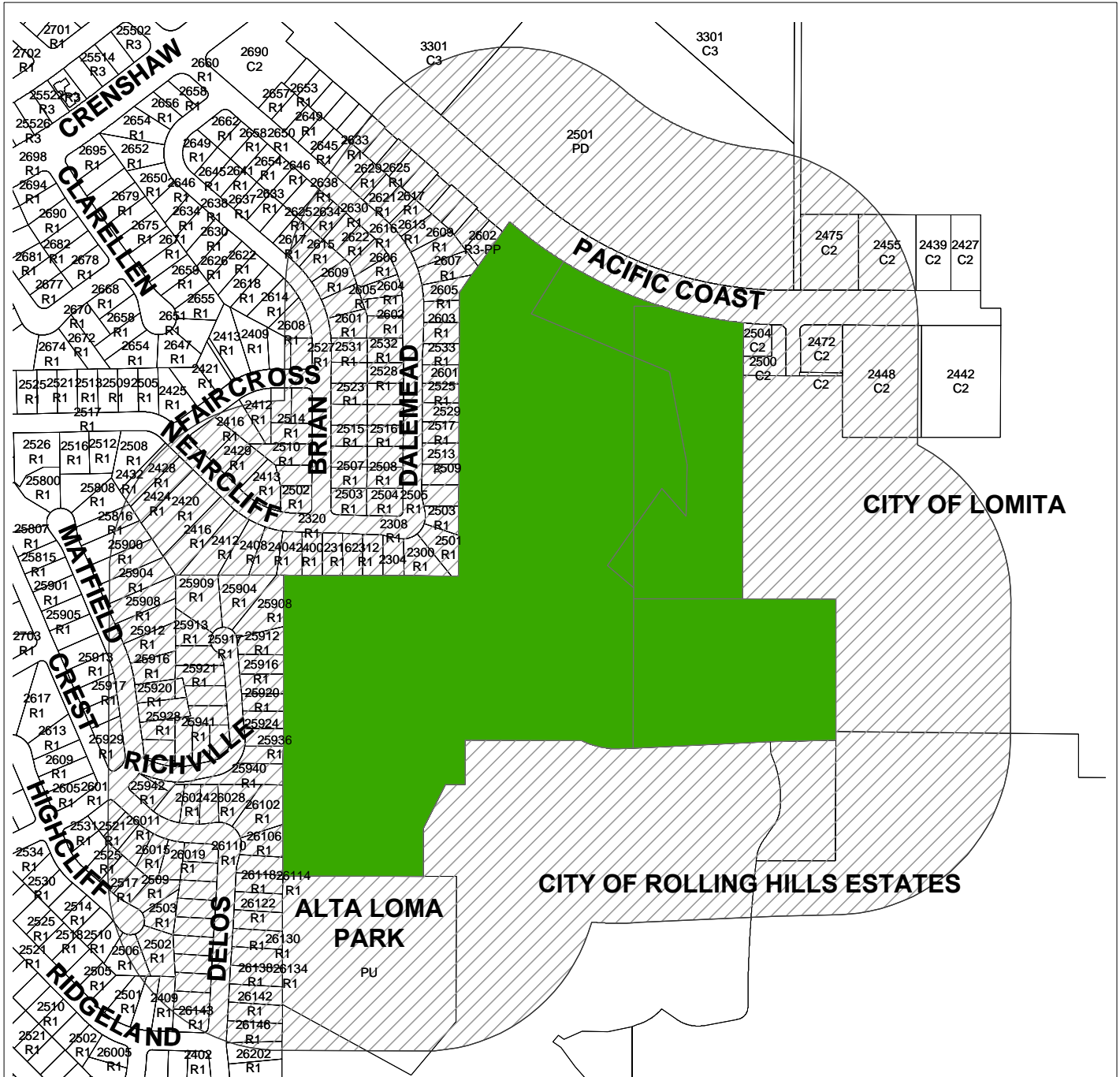
I, ROBERT GARCIA, Secretary to the Planning Commission of the City of Torrance, California, do hereby certify that the foregoing resolution was duly introduced and adopted by the Planning Commission of the City of Torrance at a regular meeting of said Commission held on the 16th day of April 2025, by the following roll call vote:

- AYES: COMMISSIONERS:
- NOES: COMMISSIONERS:
- ABSENT: COMMISSIONERS:
- ABSTAIN: COMMISSIONERS:

Secretary, Torrance Planning Commission

ITEM 8C
ATTACHMENT 2

Location and Zoning Map





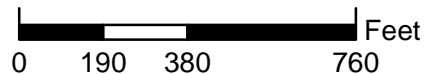
LOCATION AND ZONING MAP

MOD23-00010, MHE23-00050

2550 Pacific Coast Highway

LEGEND

-  2550 Pacific Coast Highway
-  Notification Area



ITEM 8C
ATTACHMENT 3

Correspondece

LAW OFFICES
FORD, WALKER, HAGGERTY & BEHAR

LIMITED LIABILITY PARTNERSHIP
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ONE WORLD TRADE CENTER
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RETIRED
G. RICHARD FORD
TIMOTHY P. McDONALD
THEODORE P. SHIELD (1920 – 2010)

* ADMITTED IN NEVADA
** ALSO ADMITTED IN NEVADA
*** ALSO ADMITTED IN ARIZONA
**** ALSO ADMITTED IN TEXAS
***** ALSO ADMITTED IN OHIO
+ ALSO ADMITTED IN NV & AZ
++ ALSO ADMITTED IN D.C.

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KRISTINE M. GAMBOA
STEPHANIE MARIE BLACK
MARK W. FLORY
LINH T. CAO
LILI MOSTOFI
KIMBERLY A. MUELLER
JOHNNY T. PARSEGHIAN
JEANETTE D. LAWRENCE

BEN G. GAGE
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EMILY T. ZINN
ANTHONY L. LIVESAY
RUTH E. HESS++
CHRISTINE A. KINGSTON
ROBERT L. BOOKER II
JOHN R. WATERMAN
MELISSA E. FISCHER
GABRIELA MARQUEZ
BRYAN D. PYLES
KATIE A. FITZGERALD
ARTHUR W. SCHULTZ
ERNIE G. FIGUEROA
ERAN S. FORSTER**
TINA C. PARK
DAVID J. MENDOZA
DAVID Y. HUA
GIULIANA REGINA
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B. ERIC NELSON*****
DON H. OHNOKI
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PETRA RADUSIC
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OMID VALINASAB
MICHAEL H. TAFARELLA
CORNELO V. DILAG
CHRISTOPHER E. PHELPS
CARLA VILLARREAL
EVAN K. GRUETTER
SCOTT H. BARBAG**
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KATRINA WANG
ROCHELLE R. DE GOLIER
MICHAEL J. MERMELSTEIN
PEDRO J. MONCAYO
NUPUR APTE
MEHRDOD K. ABADI
THERESA T. NGUYEN
NAVEEN Q. FERROZ
GREGORY L. GARCIA
SAMANTHA M. SANNES
N. JESSICA YIN

November 1, 2023

OBJECTION TO PROPOSED
SOLAR FARM DEVELOPMENT ABOVE
SKYLINE MOBILE HOME PARK
November 15, 2023

Shorebreak Energy Developers
1061 E. 4th Street, Santa Ana, CA 92701

Skyline Mobile Home Park
2550 Pacific Coast Hwy, Torrance CA 90505

Skyline Homes Land LLC
Mike Misera
4040 MacArthur Blvd., Suite 300,
Newport Beach, CA 92660
Email: mike@spcnb.com

November 1, 2023
Page 2

City of Torrance – Planning and Development
Marissa Montero
3031 Torrance Blvd., Torrance, CA 90503
Ramirez, Michelle <MRamirez@TorranceCA.gov>,
Martinez, Oscar <OMartinez@TorranceCA.gov>
Montero, Marissa <MMontero@TorranceCA.Gov>

To Whom It May Concern,

Please be advised that this office has been retained to represent the interests the Paulson family residence at 25940 Richville Dr., Torrance, California in relation to a proposed “solar farm” to be placed behind the Paulson residence. This is an area that has been designated as open space under Government Code section 65560 (A.K.A. Dead Horse Canyon). It has come to our attention that a proposed development on the subject piece of land would consist of placement of 900 solar panels (14 x 7 ft.) over a +60,000 sq.ft. area.

The Paulson’s residence abuts the area where the proposed solar farm is being considered, and hereby OBJECTS to the placement of any manmade objects in the area designated as “open” and undeveloped. The placement of solar panels or any structures in the area is a violation of the Hillside Overlay Rules/Regulations (91.41 et seq.), Government Code section 65560, and would negatively impact my client’s scenic view and property rights. Accordingly, my client will vigorously oppose any such attempt to place the solar panels in the designated “open” area.

Please contact me should you have any comments or questions regarding any of the above.

Very truly yours,



JOHN K. PAULSON
Of FORD, WALKER, HAGGERTY & BEHAR

JKP;jkp

November 1, 2023

tpatel@fwhb.com

(562) 983-2542

(562) 590-3503

OBJECTION TO PROPOSED
SOLAR FARM DEVELOPMENT ABOVE
SKYLINE MOBILE HOME PARK

Shorebreak Energy Developers
1061 E. 4th Street, Santa Ana, CA 92701

Skyline Mobile Home Park
2550 Pacific Coast Hwy, Torrance CA 90505

Skyline Homes Land LLC c/o Mike Misera
4040 MacArthur Blvd., Suite 300,
Newport Beach, CA 92660
Email: mike@spcnb.com

City of Torrance – Planning and Development
3031 Torrance Blvd.
Torrance, CA 90503
Ramirez, Michelle <MRamirez@TorranceCA.gov>
Martinez, Oscar <OMartinez@TorranceCA.gov>
Montero, Marissa <MMontero@TorranceCA.Gov>

To Whom It May Concern,

Please be advised that this office has been retained to represent the interests of the Patel family residing at 26102 Delos Ave., Torrance, California in relation to a proposed “solar farm” to be placed in an area that has been designated as open space under Government Code section 65560 (A.K.A. Dead Horse Canyon). It has come to our attention that a proposed development on the subject piece of land would consist of placement of 900 solar panels (14 x 7 ft.) over a +60,000 sq. ft. area.

The Patel’s residence abuts the area where the proposed solar farm is being considered, and **OBJECTS** to the placement of any manmade objects in the area designated as “open” and undeveloped. The placement of solar panels or any structures in the area is a violation of the government code section, and would also negatively impact my client’s property rights including my client’s scenic view. Accordingly, my client will vigorously oppose any such attempt to place the panels in the designated open area.

Please contact me should you have any comments or questions regarding any of the above.

Very truly yours,

A solid black rectangular box redacting the signature of Tejas B. Patel.

TEJAS B. PATEL
Of FORD, WALKER, HAGGERTY & BEHAR

TBP:sv

Z:\Shared\G-Drive\Shared\Files\Tejas Patel_TBP\Patel Opposition Letter (11-01-23).docx

LAW OFFICES
FORD, WALKER, HAGGERTY & BEHAR

LIMITED LIABILITY PARTNERSHIP
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LONG BEACH

ONE WORLD TRADE CENTER
27TH FLOOR
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WILLIAM C. HAGGERTY
DONNA ROGERS KIRBY
STEPHEN W. MOORE
KATHERINE M. HARWOOD
VICTORIA A. SILCOX
MARY B. PENDLETON
NEIL S. TARDIFF
JOHN W. RANUCCI

RETIRED
G. RICHARD FORD
TIMOTHY P. McDONALD
THEODORE P. SHIELD (1920 – 2010)

* ADMITTED IN NEVADA
** ALSO ADMITTED IN NEVADA
*** ALSO ADMITTED IN ARIZONA
**** ALSO ADMITTED IN TEXAS
***** ALSO ADMITTED IN OHIO
+ ALSO ADMITTED IN NV & AZ
++ ALSO ADMITTED IN D.C.

March 10, 2025

JEFFREY S. BEHAR
PATRICK J. GIBBS
JAMES D. SAVAGE
ROBERT L. REISINGER
TINA I. MANGARPAN
SHAYNE L. WULTERIN**
JOHN K. PAULSON
CHARLES J. SCHMITT
JON A. HAMMERBECK
WILLIAM O. WOODLAND
SEAN GANDHI**
TEJAS B. PATEL
STACY A. BRADFIELD
JENNIFER L. RUSSELL
ARMEN A. AVAKIAN
JEET SEN
ARTHUR J. CASEY
JUAN C. DELGADO
MARK P. LaSCOLA
TODD R. BECKER
JENNIE L. HERTZOG
WIN D. DOAN
GLENN S. GOLDBY***
MICHAEL S. AYERS
MARK S. LEVINE
DANIEL N. STEIN
KEVIN R. LAZAR*
JOHN C. ELLIS
MICHELE M. MESSENGER
RENEE E. JENSEN**
MARGARET K. SHELTON
MICHAEL D. GOODMAN
ANDREW B. LEAL
ENNY VAN WANG
SHIRLEY C. BRIDWELL
ROBERT A. KUBLER****
ASHLEY S. LOEB
JOSHUA S. DIXON
KRISTINE M. GAMBOA
STEPHANIE MARIE BLACK
MARK W. FLORY
LINH T. CAO
LILI MOSTOFI
KIMBERLY A. MUELLER
JOHNNY T. PARSEGHIAN
JEANETTE D. LAWRENCE

BEN G. GAGE
ALYSSA G. CAPUTO
EMILY T. ZINN
ANTHONY L. LIVESAY
RUTH E. HESS++
CHRISTINE A. KINGSTON
ROBERT L. BOOKER II
JOHN R. WATERMAN
MELISSA E. FISCHER
GABRIELA MARQUEZ
BRYAN D. PYLES
KATIE A. FITZGERALD
ARTHUR W. SCHULTZ
ERNIE G. FIGUEROA
ERAN S. FORSTER**
TINA C. PARK
DAVID J. MENDOZA
DAVID Y. HUA
GIULIANA REGINA
BRANDON M. MATAMOROS
B. ERIC NELSON*****
DON H. OHNOKI
MARK P. NELSON
ISLAM A. BAHHUR
PETRA RADUSIC
JORGE A. LOPEZ, HERRERA
CHRISTIANA S. CARTER
OMID VALINASAB
MICHAEL H. TAFARELLA
CORNELO V. DILAG
CHRISTOPHER E. PHELPS
CARLA VILLARREAL
EVAN K. GRUETTER
SCOTT H. BARBAG**
LEAH J. KIM
KATRINA WANG
ROCHELLE R. DE GOLIER
MICHAEL J. MERMELSTEIN
PEDRO J. MONCAYO
NUPUR APTE
MEHRDOD K. ABADI
THERESA T. NGUYEN
NAVEEN Q. FERROZ
GREGORY L. GARCIA
SAMANTHA M. SANNES
N. JESSICA YIN

WRITER'S EMAIL ADDRESS
jppaulson@fwhb.com

WRITER'S DIRECT DIAL NUMBER
(562) 983-2590

WRITER'S DIRECT FAX NUMBER
(562) 590-3503

OBJECTION TO PROPOSED REZONING MODIFICATION AND EXEMPTION
FOR THE EASMENT OF HIGHSIDE OVERLAY AREA
RE: MOD23-00010, MHE23-00050 - SOLAR FARM DEVELOPMENT ABOVE
SKYLINE MOBILE HOME PARK
March 19, 2025 PUBLIC HEARING

Skyline Homes Land LLC
Mike Misera
4040 MacArthur Blvd., Suite 300,
Newport Beach, CA 92660
Email: mike@spcnb.com

City of Torrance – Planning and Development
Marissa Montero
3031 Torrance Blvd., Torrance, CA 90503
Ramirez, Michelle <MRamirez@TorranceCA.gov>,
Martinez, Oscar <OMartinez@TorranceCA.gov>
Montero, Marissa <MMontero@TorranceCA.gov>

March 10, 2025
Page 2

To Whom It May Concern,

Please be advised that this office has been retained to represent the interests the Paulson family residence at 25940 Richville Dr., Torrance, California in relation to a proposed “solar farm” to be placed behind the Paulson residence. This is an area that has been designated as open space under Government Code section 65560 (A.K.A. Dead Horse Canyon). Previously, a proposed development on the subject piece of land would consist of placement of 900 solar panels (14 x 7 ft.) over a +60,000 sq.ft. area. Now it appears a modification and exemption are being requested for the area of land directly behind the Paulson home to accomplish the solar farm.

The Paulson’s residence abuts the area where the proposed easement and exemption are being requested with the goal of installing solar farm. The Paulson family hereby **OBJECTS** to the placement of any manmade objects in the area designated as “open” and undeveloped. The placement of solar panels or any structures in the area is a violation of the Hillside Overlay Rules/Regulations (91.41 et seq.), Government Code section 65560, and would be noise and visual pollution, negatively impacting my client’s scenic view and property rights. Any man-made structure, even a foot off the ground, negatively effects the homeowner’s view. Accordingly, my client will vigorously oppose any such attempt to place the solar panels in the designated “open” area.

Please contact me should you have any comments or questions regarding any of the above.

Very truly yours,



JOHN K. PAULSON
Of FORD, WALKER, HAGGERTY & BEHAR

JKP;jkp

March 11, 2025

tpatel@fwhb.com

(562) 983-2542

(562) 264-3414

OBJECTION TO PROPOSED REZONING MODIFICATION AND EXEMPTION
FOR THE EASMENT OF HIGHSIDE OVERLAY AREA
RE: MOD23-00010, MHE23-00050 - SOLAR FARM DEVELOPMENT ABOVE
SKYLINE MOBILE HOME PARK
March 19, 2025 PUBLIC HEARING

Skyline Homes Land LLC
Mike Misera
4040 MacArthur Blvd., Suite 300,
Newport Beach, CA 92660
Email: mike@spcnb.com

City of Torrance – Planning and Development
Marissa Montero
3031 Torrance Blvd., Torrance, CA 90503
Ramirez, Michelle <MRamirez@TorranceCA.gov>,
Martinez, Oscar <OMartinez@TorranceCA.gov>
Montero, Marissa <MMontero@TorranceCA.Gov>

March 11, 2025
Page 2

To Whom It May Concern,

Please be advised that this office has been retained to represent the interests the Patel family residence at 26102 Delos Ave., Torrance, California in relation to a proposed “solar farm” to be placed behind the Patel residence. This is an area that has been designated as open space under Government Code section 65560 (A.K.A. Dead Horse Canyon). Previously, a proposed development on the subject piece of land would consist of placement of 900 solar panels (14 x 7 ft.) over a +60,000 sq.ft. area. Now it appears a modification and exemption are being requested for the area of land directly behind the Patel home to accomplish the solar farm.

The Patel’s residence abuts the area where the proposed easement and exemption are being requested with the goal of installing solar farm. The Patel family hereby **OBJECTS** to the placement of any manmade objects in the area designated as “open” and undeveloped. The placement of solar panels or any structures in the area is a violation of the Hillside Overlay Rules/Regulations (91.41 et seq.), Government Code section 65560, and would be noise and visual pollution, negatively impacting my client’s scenic view and property rights. Any man-made structure, even a foot off the ground, negatively effects the homeowner’s view. Accordingly, my client will vigorously oppose any such attempt to place the solar panels in the designated “open” area.

Please contact me should you have any comments or questions regarding any of the above.

Very truly yours,

A solid black rectangular box redacting the signature of Tejas B. Patel.

TEJAS B. PATEL
Of FORD, WALKER, HAGGERTY & BEHAR

TBP:sv

Oorts, Leo

From: Jane Salik <Jane.Salik@polypeptide.com>
Sent: Tuesday, March 18, 2025 4:56 PM
To: Planning Commission
Cc: Ed Strobel
Subject: Public comment
Attachments: Geotechnical Engineer report.pdf; Public Comment.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from jane.salik@polypeptide.com. [Learn why this is important](#)

Correction

Record Number: MOD23-00010, MHE23-00050

Jane Salik
Board of Directors, PolyPeptide AG
M: +1 310 800-5012
jane.salik@polypeptide.com

PolyPeptide Laboratories Inc.
365 Maple Avenue
Torrance CA 90503, United States

T: +1 310 782 3569
polypeptide.com

From: Jane Salik
Sent: Tuesday, March 18, 2025 4:42 PM
To: planningcommission@torranceca.gov
Cc: Ed Strobel [REDACTED]
Subject: Public comment

Dear Planning Commission
Attached is our Public Comment and a geotechnical engineer's report for
Record Number:MOD23-000010, MHE23-00050
Project Address:2550 Pacific Coast Highway

Please contact us with any questions.

Thank you,

Jane Salik

Ed Strobel

[REDACTED]
[REDACTED]
Torrance,
CA 905050

Jane Salik
Board of Directors, PolyPeptide AG
M: +1 310 800-5012
jane.salik@polypeptide.com

PolyPeptide Laboratories Inc.
365 Maple Avenue
Torrance CA 90503, United States

T: +1 310 782 3569
polypeptide.com

PUBLIC COMMENT

Record Number: MOD23-000010, MHE23-00050

Project Address: 2550 Pacific Coast Highway

OBJECTION TO PLACING SOLAR PANELS ON HILLSIDE ABOVE SKYLINE MOBILE HOME PARK

1. The 4.5 acres immediately north of Alta Loma Park and including Dead Horse Canyon “has been deed restricted so that it will remain permanent open space.” The Environmental Impact Report (EIR) from 2009 reported **“that the land has severe topological features so that it will be reserved as passive open space.”**
The placement of a ground mounted solar farm in an area deeded as open space is not a minor hillside exemption, or variance, since it turns the passive open space into a light industrial operation. A geotechnical engineer we hired, Richard A. Martin, remarked that this 4.5-acre area “is not suitable for construction. A detailed geotechnical engineering and engineering geology investigation would be required for slope repair work” before any solar panel installation. Because of this hillside’s current instability and its proximity to the Palos Verdes Fault (1/4 mile), it is surprising the project is exempt from the CEQA; the guidelines do not mention such important conditions, but the City of Torrance should look at this more broadly and should consider whether such an exemption is warranted in this case. The R1-PP Variation must also adhere to strict R1 standards, and allowing a light industrial operation in an area deeded as open space is a clear violation of such R1 standards. There is a scarcity of open space in Torrance, and this hillside area allows visitors in Alta Loma Park to have wonderful views of the LA Basin and mountain peaks; a solar farm would be an eyesore in this location.
2. **The 4.5-acre area in question is not regulated by the City of Torrance but rather by the California Department of Housing and Community Development.** The City has no authority to enforce violations or direct any needed remediations. We learned this first hand when a significant mudslide occurred on February 5, 2024 (Daily Breeze, February 6, 2024) and no remediation work was performed since the slide. After discussions with our current and former city councilmen and staff from the Community Development Office we were told that the City of Torrance had no authority to compel Saunders to fix the ongoing land movement. We were told to contact the State Department of Housing and Community Development, the responsible agency. If Saunders Property Company plans to install the solar farm on a small parcel of land actually owned by the City of Torrance, it should be clear that the vast majority and most unstable portion of the hillside is outside the purview and authority of the City of Torrance. Why would the Planning Commission even consider putting solar panels on City Property deeded as passive open space and deemed unsuitable for development according to the 2009 Environmental Impact Report?

3. **Gross negligence by Saunders Property Company** with respect to hill maintenance and repair should disqualify them for consideration. Since the 2024 mudslide Saunders has done nothing to stabilize the hill other than tarping and sandbagging one small area directly above the mobile home park. A number of erosion scars have turned into several landslides, one of which undermined a significant portion of the middle swale. There are several other areas where the swales have been undermined, and water has been overflowing. Saunders has done nothing to correct this ongoing land movement. There has been such a lack of general maintenance that Saunders allowed the irrigation system to break and become unusable; the pipes are disconnected and strewn haphazardly along the hillside. No irrigation, no mowing or brush clearing on the hillside and nothing done to ameliorate the damage caused by the 2024 mudslide.

We have contacted the City regarding this negligence on the part of Saunders Property Company, and I can forward our communications if needed; we also have numerous photographs of this continuous subversion and weakening of the hill. We contacted our City Councilman in December 2023 about land movement I observed where previous mudslides occurred; this was one month after Saunders first proposed the solar farm in November 2023. In February 5, 2024 the mudslide occurred in the same area where I noticed the land movement in December. Saunders had the opportunity to fix this situation and it was ignored, creating this current precarious condition. There was no such issue when the Chandler company was responsible for maintenance and upkeep; they were proactive and did all they could to protect the hillside.

We commissioned a geotechnical engineer to ascertain the risk we face with the ongoing land movement in the hillside above Skyline Mobile Home Park. His report is included as a separate attachment. One conclusion stated **“if there is a continued lack of maintenance and repairs, the City of Torrance may be forced to red tag your home.”**

The fact that this area has been deeded to be preserved as open space, the well documented history of its instability, the neglect and complete lack of maintenance on the part Saunders Property Company, and the fact that the City of Torrance has no regulatory or enforcement authority in this matter makes it very clear that the Planning Commission deny this proposal.

Thank you for considering our request,

Ed Strobel

Jane Salik

90505

RICHARD A. MARTIN, GEOTECHNICAL ENGINEER
2114 PASEO DEL MAR, SAN PEDRO, CA 90732
PHONE (310) 935-9693 EMAIL: rmartin2114@gmail.com

March 7, 2025
Project No. 205-025

Jane Salik & Ed Strobel

Torrance, CA 90503

Email:

Project Reference: Geotechnical Opinion Report for Offsite Slope Failures
above 255-256 Skyline Drive in Torrance, California

Dear Mrs. Salik & Mr. Strobel:

At your request, the writer inspected the referenced property on February 17, 2025. In addition, records maintained by this office, published geologic maps, and reports by others were reviewed. This report is based upon observations and record review and did not include subsurface exploration.

The intent of this report is to convey geotechnical data which you may consider in discussion with the City of Torrance and the owners of Skyline Mobile Park.

SITE CONDITIONS

Your property is located on the east side of Riceville Drive in the city of Torrance. The building pad is fairly level to the east end of the residence where the site drops about 10 feet to a patio. The patio is supported by a retaining wall, The east property line is a few feet above the upper drainage swale. The ground surface continues to descend at about 1½ to 1 (horizontal to vertical) for a height of about 75-feet to the mobile home park. Three gunite or concrete drainage swales have been constructed on the slopes

During the heavy rains of 2022-2024, a number of erosion scars turned into surficial landslides. The Google aerial photograph dated 7-2023 is the "before" site conditions, and the photo dated 1-2024 is the "after".

Untitled Map

Write a description for your map.

25932

25928 Richville Dr



25928

25924

GLD Insurance

Richville Dr

25916

- Legend 1-10-23**
-  25928 Richville Dr
 -  GLD Insurance

Google Earth

Image © 2025 Airbus

100 ft



Untitled Map

Write a description for your map.

Google Earth

Data SIO, NOAA, U.S. Navy, NGA, GEBCO
Image Landsat / Copernicus
Data USGS



Legend 1-2024

- 25928 Richville Dr
- GLD Insurance

100 ft



Geology

The site is underlain by tan silty sand

Seismicity

The subject site is located about ¼ mile southwest of the potentially active Palos Verdes Fault.

The slopes of the subject site are in an area the State deemed potentially unstable during an earthquake.

CONCLUSIONS

The slopes contain soil which have little binder (cohesion) which is needed to reduce erosion and surface slippage. Good ground cover would help stabilize the surface. However, a large leaf ice plant was used, which is a good fire retardant, but is top heavy and tend to slide in sheets.as happened on a large scale in Baldwin Hills during heavy rains in1969.

Unless there is an earthquake on the Palos Verdes Fault, it doesn't look like the slide is deep enough to affect your property, currently. If there is a continued lack of maintenance and repairs, the City of Torrance may be forced to red tag your home.

It is believed that repairing slope failures will require reinforced earth or post and boards, or both. There were several areas visible where the swales have been undermined which will need repairs before they become surficial slides. Water has been flowing over the edge of the swales. The method of repair is up to the owners of Skyline Mobile Home Park and approved by the city of Torrance.

REMARKS

This report is not suitable for construction on the mobile home property. A detailed geotechnical engineering and engineering geology investigation would be required slope repair work be performed on the property.

This study was made in accordance with generally accepted engineering procedures and included such observation and document review considered necessary in the circumstances. No other warranty, expressed or implied, is made as to the professional advice included in this report.

Respectfully submitted,



Richard A. Martin, MS, PE, GE

RAM/jm



Oorts, Leo

From: Vijay Patel [REDACTED]
Sent: Tuesday, April 1, 2025 12:58 PM
To: Oorts, Leo
Subject: Re: Rebuttal letter

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Leo, please attach this picture
also



Sent from my iPhone

On Apr 1, 2025, at 10:31 AM, Oorts, Leo <LOorts@torranceca.gov> wrote:

Hi Vijay,

Received, thank you. The comment letter will be attached to the staff report.

Please note the project has been rescheduled to the following Planning Commission meeting that will be held on Wednesday, April 16 at 6:30pm in the Council Chambers located at 3031 Torrance Boulevard, Torrance, CA 90503. A copy of the meeting agenda and staff report will be made available on the [City Clerk's Office webpage](#) on Friday, April 11.

LEO OORTS

Senior Planner - Community Development Department
310-618-5925 | LOorts@TorranceCA.Gov

<image001.png>

[TorranceCA.Gov](#) |

<image002.png>

[Facebook](#) |

<image003.png>

[X \(Formerly Twitter\)](#) |

<image004.png>

[Instagram](#)

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From: Vijay Patel [REDACTED]
Sent: Monday, March 31, 2025 3:16 PM
To: Oorts, Leo <LOorts@TorranceCA.Gov>
Subject: Fwd: Rebuttal letter

Greetings Leo,

See attached

Thank you,

Vijay Patel | Tel: (310) 224-3000 ext. #104

Select Systems Technology, Inc.

| Contains sensitive proprietary and confidential information. Not for
| further distribution without the express written consent of Select
| Systems Technology, Inc.

----- Forwarded Message -----

Subject: Rebuttal letter
Date: Mon, 31 Mar 2025 13:04:00 -0700
From: Vijay Patel [REDACTED]
Reply-To: [REDACTED]
To: Tejas Patel [REDACTED]

Hi T, here is the letter in folder with the pictures

Thank you,

Vijay Patel | Tel: (310) 224-3000 ext. #104

Select Systems Technology, Inc.

| Contains sensitive proprietary and confidential information. Not for
| further distribution without the express written consent of Select
| Systems Technology, Inc.

April 2, 2025

City Of Torrance
Community Development Department
3031 Torrance Blvd.
Torrance, CA. 90503

RE: MOD23-0023, MHE23-00050

Should an exemption be granted to JWG consulting (Saunders Property management CO) on the property known as "Dead Horse Canyon" in the city of Torrance for the installation of solar panels. NO, I do not think it is in the best interests of the residents of the city of Torrance to grant an exemption.

The open space designation was assigned to Dead Horse Canyon during the final developments of Rolling Hills Country Club. The previous owner (Chandler Landfill) attempted to give the property to the city of Torrance at which time it was determined that the land was geologically unstable (city of Torrance determined it was unstable land) and could not be used by the city, in addition the property owners adjacent to Dead Horse Canyon voted it stay in private hands. The installation of solar panels may cause the land (which is geologically unstable) to shift and fall into the canyon. This past winter we had a 5' X10' chunk of land slide into the canyon due to the heavy rains. In previous years there has been more slippage and that is why there are concrete barriers at the bottom of the canyon to protect the mobile homes.

The Open Space designation means that the land is not supposed to be developed for the benefit of any one person/entity, rather it be left in its natural state for all residents of the local area to enjoy in perpetuity. I would say that Dead Horse Canyon is probably one of the last pieces of land that has not been developed at all in the city. The views from Los Altos park are enjoyed by all park attendees. In addition there is a thriving ecosystem of native flora and fauna. This would all be destroyed should an exemption be granted to fill the space with Solar panels. I am not against renewable energy sources (I have solar on my roof) but choosing between more industrial development versus the serenity of a natural habitat I would choose the natural habitat. Keep in mind that the open space designation was given as a trade off in allowing the Country club development and here we are not 15 years later asking to industrialize it rather than leaving it in its natural state for future generations. Skyline knew when they purchased the property that the Open Space designation had been applied to that parcel of land.

Not only is this exemption and potential solar farm install not good for the community , it would absolutely destroy my view, (please see pictures). Not only would I lose the view that is supposed to be protected by the Hillside Overlay Zone, I would also be damaged monetarily as the view is part of any home appraisal.

Viay Patel

[REDACTED]
Torrance, CA. 90505

[REDACTED]

ITEM 8C
ATTACHMENT 4

Project Plans

PARCEL MAP NO. 72793

SHEET 3 OF 4 SHEETS

IN THE CITY OF TORRANCE,
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

TORRANCE DIV 14-00006

MONUMENT NOTES:

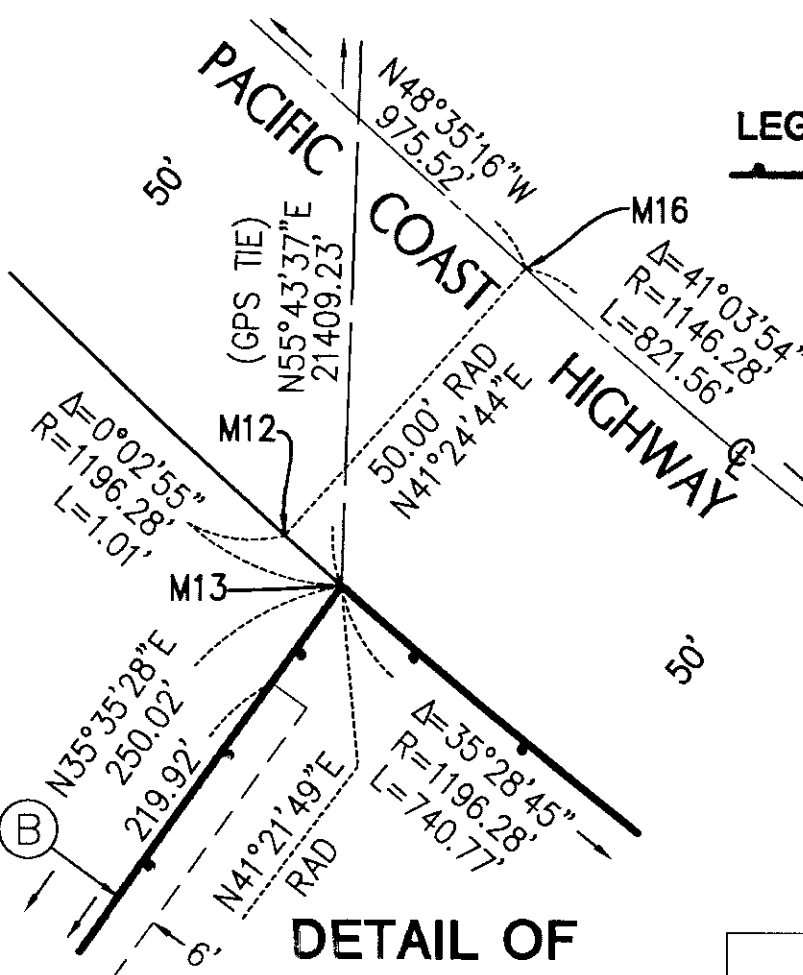
- M1 SEARCHED, FOUND NOTHING. ESTABLISHED BY INTERSECTION. SET L&T, TAGGED L.S. 8639 ON TOP OF BLOCK WALL, 4.75' ABOVE GRADE, S00°20'53"W 1.00'.
- M2 SEARCHED, FOUND NOTHING. ESTABLISHED SOUTHEAST CORNER OF TRACT NO. 2083, M.B. 21-161 BY RECORD DISTANCE (835.30') PER RECORD OF SURVEY, R.S.B. 182-4-15 FROM CENTERLINE OF PACIFIC COAST HIGHWAY. ACCEPTED AS THE SE CORNER OF TRACT NO. 2083, M.B. 21-161. SET L&T, TAGGED L.S. 8639 ON TOP OF BLOCK WALL, 4.75' ABOVE GRADE, S00°20'53"W 1.00'.
- M3 FOUND SPIKE AND WASHER, STAMPED L.S. 3999, FLUSH, NO REF. ACCEPTED AS CENTERLINE TERMINUS OF HILLWORTH AVENUE AND AS POINT ON THE S'LY BOUNDARY OF TRACT NO. 2083, M.B. 21-161. SET FOUR L.T.&TAG L.S. 8639 TIES.
- M4 FOUND "L.T.&TAG R.C.E. 13167", NO REF. HELD FOR NORTH/SOUTH LINE. ACCEPTED AS POINT ON THE S'LY PROLONGATION OF THE E'LY LINE OF TRACT NO. 2083, M.B. 21-161.
- M5 SEARCHED FOUND NOTHING. ESTABLISHED CENTERLINE INTERSECTION USING 4 FOUND TANGENT TIES, NO REF. ACCEPTED AS CENTERLINE INTERSECTION. SET 6" SPIKE AND STAMPED WASHER L.S. 8639.
- M6 FOUND 2" I.P. TAGGED R.C.E. 24988, PER RECORD OF SURVEY, R.S.B. 182-4-15, FLUSH. FITS INTERSECTION OF THE W'LY PROLONGATION OF THE S'LY LINE OF TRACT NO. 28884, M.B. 790-79-80 WITH THE W'LY LINE OF DEED RECORDED 8/7/16 AS DOCUMENT NO. 143 IN BOOK 6308, PAGE 88 OF DEEDS.
- M7 FOUND SPIKE AND WASHER, ILLEGIBLE, DOWN 0.2', PER L.A. CO. RDFB 0318, PAGES 388, 389. ACCEPTED AS CENTERLINE INTERSECTION OF HILLWORTH AVENUE AND ALLEY. SET FOUR L.T.&TAG L.S. 8639 TIES.
- M8 SEARCHED, FOUND NOTHING. ESTABLISHED CENTERLINE INTERSECTION BY INTERSECTION. FITS RECORD DISTANCE (26.63') PER RECORD OF SURVEY, R.S.B. 182-4-15. ACCEPTED AS CENTERLINE INTERSECTION. SET 6" SPIKE AND STAMPED WASHER L.S. 8639.
- M9 FOUND 2" I.P. TAGGED R.C.E. 24988 PER RECORD OF SURVEY, R.S.B. 182-4-15, DOWN 0.2', N00°23'10"E 0.10' FROM THE NE'LY CORNER OF DEED RECORDED 1/16/61 AS DOCUMENT NO. 558, OF O.R. HELD FOR LINE. ACCEPTED AS POINT ON THE N'LY PROLONGATION OF THE W'LY LINE OF TRACT NO. 2083, M.B. 21-161.
- M10 SEARCHED, FOUND NOTHING. ESTABLISHED THE NW'LY CORNER OF LOT 4 OF TRACT NO. 9765, M.B. 170-10-12 BY RECORD DISTANCE (859.40') FROM M17 PER RECORD OF SURVEY, R.S.B. 182-4-15. SET 2" I.P., CEMENT PLUG AND TACK, TAGGED L.S. 8639.
- M11 ESTABLISHED BY INTERSECTION PER RESOLUTION NO. 2014-35RMD RECORDED DECEMBER 22, 2014 AS DOCUMENT NO. 2014392095, O.R.
- M12 FOUND L.T.&TAG R.C.E. 24988, PER RECORD OF SURVEY, R.S.B. 182-4-15, FLUSH. ACCEPTED AS THE E.C. IN THE SW'LY RIGHT OF WAY OF PACIFIC COAST HIGHWAY.
- M13 ESTABLISHED INTERSECTION OF SW'LY RIGHT OF WAY OF PACIFIC COAST HIGHWAY (100' WIDE) AND THE NW'LY LINE OF LOT 2 OF TRACT NO. 9765, M.B. 170-10-12 BY INTERSECTION. ACCEPTED AS THE N'LY CORNER OF DEED RECORDED 1/16/61 AS DOCUMENT NO. 558, OF O.R. FITS FOUND L&T, TAGGED R.C.E. 30826, NO REF.
- M14 SEARCHED, FOUND NOTHING. ESTABLISHED THE SW'LY CORNER OF TRACT NO. 2083, M.B. 21-161 BY RECORD DISTANCE (142.31') FROM CENTERLINE INTERSECTION OF HILLWORTH AVENUE AND THE S'LY BOUNDARY OF TRACT NO. 2083, M.B. 21-161 PER SAID TRACT. ACCEPTED AS THE SW CORNER OF TRACT NO. 2083, M.B. 21-161. SET L&T, TAGGED L.S. 8639 IN CONCRETE BLOCK FOOTING S00°23'10"W 1.00', 3.5" ABOVE GRADE.
- M15 SEARCHED, FOUND NOTHING. ESTABLISHED BY PRORATION BETWEEN ESTABLISHED CENTERLINE INTERSECTION OF HILLWORTH AVENUE AND PACIFIC COAST HIGHWAY AND ESTABLISHED CENTERLINE INTERSECTION OF PENNSYLVANIA AVENUE AND PACIFIC COAST HIGHWAY PER TRACT NO. 28884 M.B. 790-79-80. ACCEPTED AS THE INTERSECTION OF THE N'LY PROLONGATION OF THE W'LY LINE OF TRACT NO. 28367, M.B. 783-16-17 AND THE CENTERLINE OF PACIFIC COAST HIGHWAY. SET 6" SPIKE AND STAMPED WASHER L.S. 8639.
- M16 FOUND SPIKE AND WASHER, STAMPED "CAL TRANS", DOWN 0.1', NO REF. ACCEPTED AS POINT ON CENTERLINE. FITS ESTABLISHED E.C. SET FOUR L.T.&TAG STAMPED L.S. 8639 TIES IN TOP OF CURB.
- M17 FOUND 2" I.P. TAGGED R.C.E. 24988, PER RECORD OF SURVEY, R.S.B. 182-4-15, FLUSH. ACCEPTED AS THE NE'LY CORNER OF LOT 118, TRACT NO. 18406, M.B. 534-33-37 AND AS POINT ON THE W'LY LINE OF LOT 4, TRACT NO. 9765, M.B. 170-10-12.
- M18 SEARCHED, FOUND NOTHING. ESTABLISHED BY RECORD DISTANCE (469.49') FROM THE NE'LY CORNER OF LOT 4 OF TRACT NO. 9765, M.B. 170-10-12 PER RECORD OF SURVEY, R.S.B. 182-4-15. ACCEPTED AS THE SW'LY CORNER OF DEED RECORDED 1/16/61 AS DOCUMENT NO. 558, OF O.R. AND A POINT ON THE W'LY LINE OF LOT 2 OF TRACT NO. 9765, M.B. 170-10-12.
- M19 FOUND 2" I.P. TAGGED R.C.E. 24988 PER RECORD OF SURVEY, R.S.B. 182-4-15, DOWN 0.2', ACCEPTED AS THE NE'LY CORNER OF LOT 4 OF TRACT NO. 9765, M.B. 170-10-12 AND A POINT ON THE W'LY LINE OF LOT 2 OF TRACT NO. 9765, M.B. 170-10-12.

BOUNDARY ESTABLISHMENT NOTES:

- 1 THE W'LY LINE OF DEED RECORDED 8/7/16 AS DOCUMENT NO. 143 IN BOOK 6308, PAGE 88, OF DEEDS. ESTABLISHED BY A 16.50' OFFSET W'LY FROM THE W'LY LINE OF TRACT NO. 28884, M.B. 790-79-80 PER RECORD OF SURVEY, R.S.B. 182-4-15. ACCEPTED AS THE E'LY LINE OF PARCEL 12 OF DEED RECORDED APRIL 29, 2004 AS DOCUMENT NO. 04-1056830, O.R.
- 2 THE E'LY PROLONGATION OF THE S'LY LINE OF "FIRST PARCEL" PER GRANT DEED RECORDED JANUARY 16, 1961 AS INSTRUMENT NO. 558 IN BOOK D1092, PAGE 423, O.R. AS SHOWN ON RECORD OF SURVEY, R.S.B. 182-4-15.
- 3 S'LY LINE OF "FIRST PARCEL" PER GRANT DEED RECORDED JANUARY 16, 1961 AS INSTRUMENT NO. 558 IN BOOK D1092, PAGE 423, O.R. ESTABLISHED BY RECORD ANGLE PER RECORD OF SURVEY, R.S.B. 182-4-15. ACCEPTED AS THE N'LY LINE OF PARCEL A OF RESOLUTION NO. 2014-35RMD RECORDED DECEMBER 22, 2014 AS DOCUMENT NO. 20141392095, O.R.
- 4 N'LY LINES OF PARCEL A OF RESOLUTION NO. 2014-35RMD RECORDED DECEMBER 22, 2014 AS DOCUMENT NO. 20141392095, O.R.

EASEMENT NOTES:

- (A) EASEMENT TO THE CITY OF TORRANCE FOR OPEN SPACE PURPOSES.
ALLOW FOR THE USE OF SOLAR PANELS, AND OTHER RELATED EQUIPMENT AND THE INSTALLATION OF PROTECTIVE FENCING.
- (B) 6' WIDE EASEMENT OF SOUTHERN CALIFORNIA EDISON COMPANY, A CORPORATION, FOR ELECTRIC LINE PURPOSES, RECORDED MARCH 5, 1953 AS DOCUMENT NO. 2978 IN BOOK 41134, PAGE 441, O.R.
- (C) 10' WIDE EASEMENT OF SOUTHERN CALIFORNIA EDISON COMPANY, A CORPORATION, FOR ELECTRIC LINE PURPOSES, RECORDED JUNE 14, 1961 AS DOCUMENT NO. 3202, O.R.
- (D) 6' WIDE EASEMENT OF SOUTHERN CALIFORNIA EDISON COMPANY, A CORPORATION, FOR UNDERGROUND ELECTRICAL SUPPLY SYSTEMS AND COMMUNICATION SYSTEMS PURPOSES, RECORDED JANUARY 25, 1971 AS DOCUMENT NO. 2988, O.R.



LEGEND:
 INDICATES THE BOUNDARY OF THE LAND BEING SUBDIVIDED BY THIS MAP.

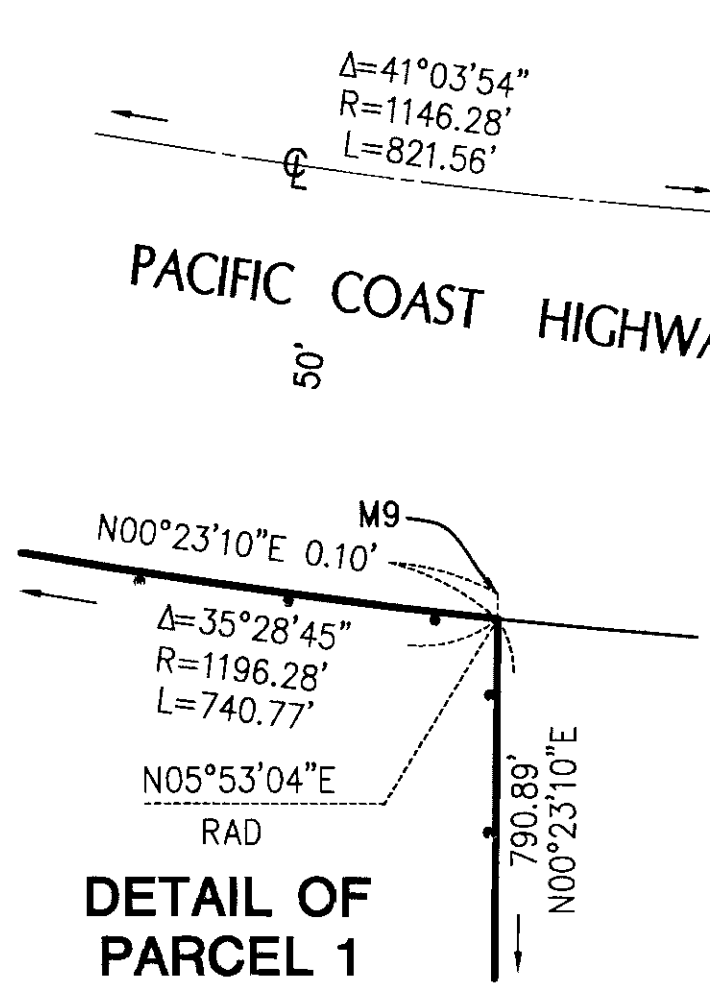
DATUM STATEMENT:
 COORDINATES SHOWN HEREON ARE GROUND, UNLESS OTHERWISE NOTED. TO OBTAIN GRID DISTANCES, MULTIPLY GROUND DISTANCE BY 1.00005700. THIS COMBINATION FACTOR IS PROJECT SPECIFIC.

CURVE TABLE			
CURVE	DELTA	RADIUS	LENGTH
C1	17°17'59"	160.00'	48.31'
C2	33°32'02"	20.00'	11.71'
C3	26°23'55"	239.00'	110.12'

LINE TABLE		
LINE	BEARING	LENGTH
L1	N89°39'09"W	169.04'
L2	N89°39'09"W	142.41'
L3	N89°39'09"W	872.33'
L4	N89°39'09"W	26.63'
L5	N89°39'09"W	284.99'
L6	N00°20'53"E	378.93'
L7	N87°45'25"W	40.10'
L8	N58°42'33"E	16.42'
L9	N89°37'03"E	32.09'
L10	N00°20'53"E	402.76'
L11	N00°22'00"E	187.78'
L12	N00°11'58"E	137.10'
L13	N89°58'55"E	56.85'
L14	N00°01'05"W	126.05'
L15	N89°39'15"W	16.50'
L16	N35°35'28"E	250.02'
L17	N80°02'10"E	271.00'
L18	N29°32'50"W	93.00'
L19	N49°07'50"W	111.00'
L20	N41°42'10"E	325.00'
L21	N33°32'10"E	40.00'
L22	N24°42'10"E	175.00'

DETAIL OF PARCEL 1

DETAIL "A"
NOT TO SCALE



DETAIL OF PARCEL 1

DETAIL "B"
NOT TO SCALE

Confidentiality Statement:
 This drawing is the property of Shorebreak Energy Developers. This information is confidential and is to be used only in connection with work described by Shorebreak. No part is to be disclosed to others without written permission from Shorebreak.

SHOREBREAK ENERGY DEVELOPERS
 LIC# C-10, A 912916
 EXP: 8/31/24

Array #	Panel Count	Azimuth	Tilt
GM	712	180	3
712			

PANEL TYPE:
 Q CELL SOLAR
 Q.PEAK DUO XL-G10.3/BFG
 480 WATTS

MID CLAMP:
 1/4" GAP BOTH WAYS
 BETWEEN PANELS

NOTE: PLAN DIMENSIONS ALSO INCLUDE 2" ADDITIONAL AT EACH CARPORT END FOR EASE OF INSTALLATION

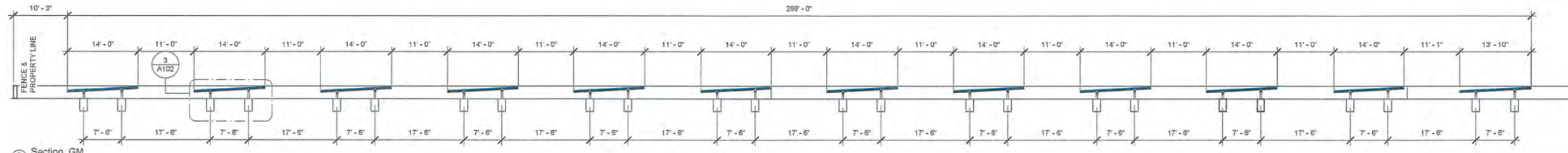
NOTE: START PLACEMENT FROM CENTER OUTWARD TO LEAVE EQUAL ADDITIONAL PURLIN LENGTH AT BOTH ENDS

CLIENT APPROVAL
 Client Initials

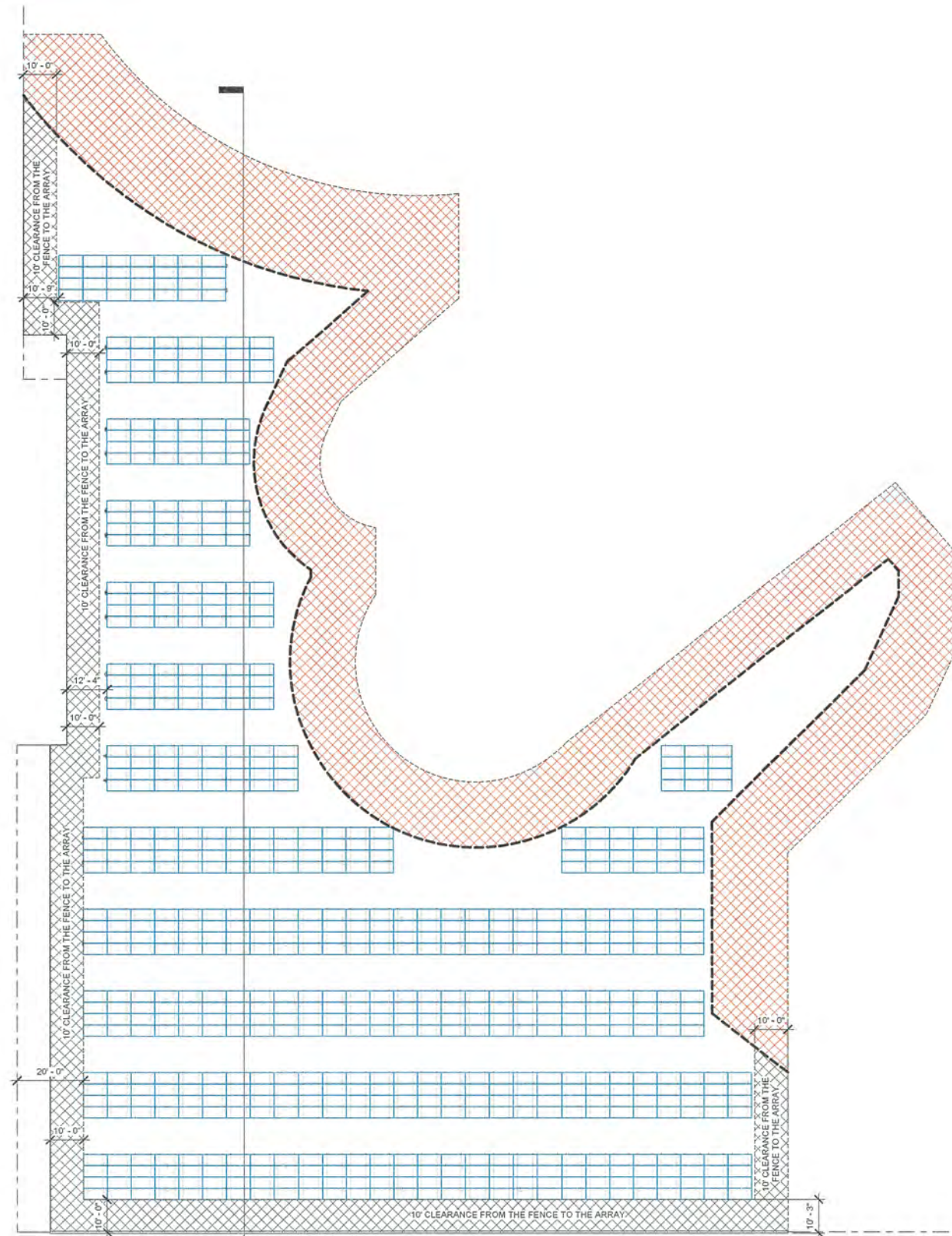
Skyline Mobile Home Park
 2550 Pacific Coast Hwy,
 Torrance, CA 90505

No.	Description	Date

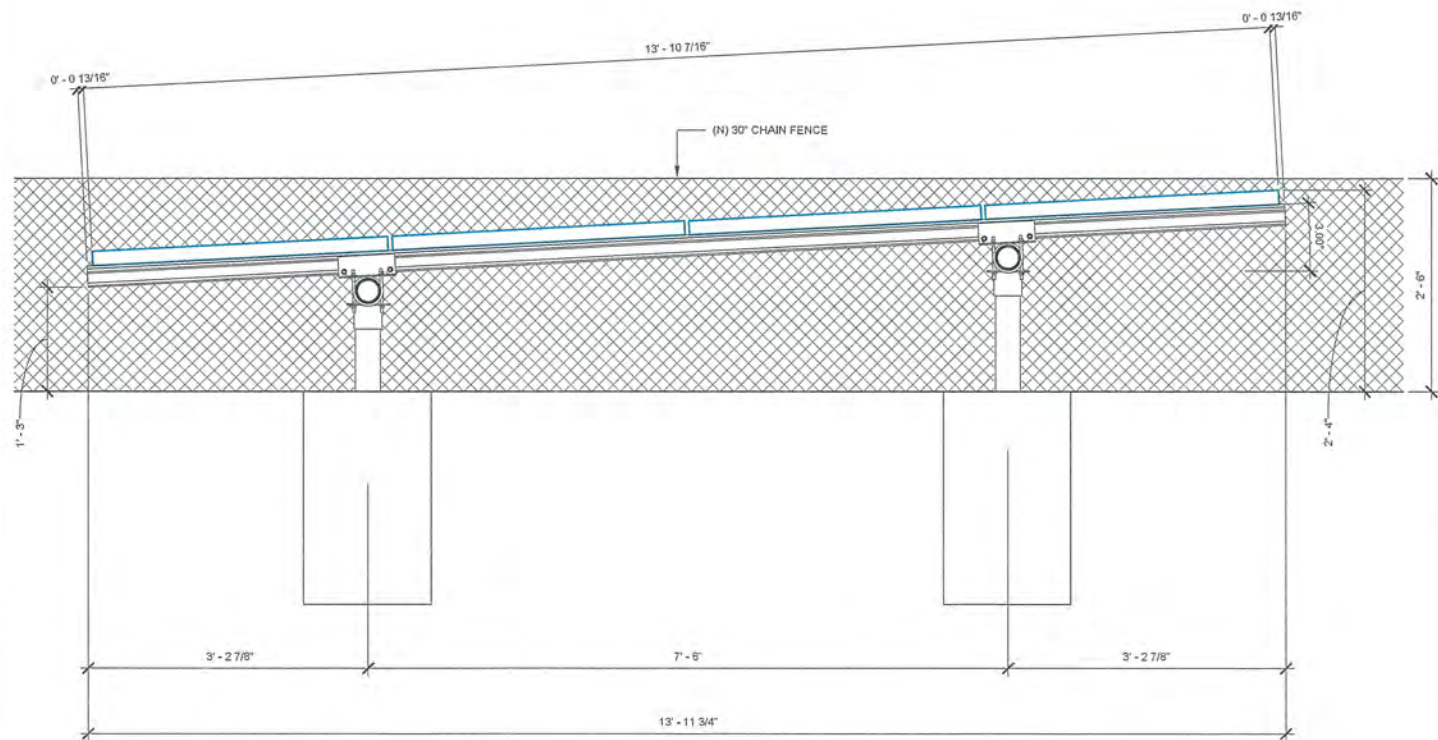
SHOREBREAK ENERGY DEVELOPERS
 Layout
A102
 2/27/2025 2:10:54 PM
 To scale on 24x36 paper



2 Section, GM
 3/32" = 1'-0"



1 GM Layout
 1" = 20'-0"



3 Section, GM (Details)
 1" = 1'-0"