



CITY OF
Palos Verdes Estates

June 7, 2019

Mr. Danny Santana
Community Development Director
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503

Re: Butcher Solana Project – Require Silhouette During DEIR Review Process

Dear Mr. Santana,

On behalf of the City of Palos Verdes City Council, I am writing to strongly urge the City of Torrance to require the developer for the Butcher Solana Project to erect silhouettes of the proposed building outlines at commencement of and throughout the duration of the Draft Environmental Impact Report (DEIR) public review and comment period. We know that the City of Torrance requires a silhouette before a development application can be deemed complete and processed for Planning Commission review; however, there is great benefit to having a silhouette in place during the DEIR review and comment period.

As you know, the EIR is an informational document which will inform decision makers and the public about the potential significant environmental impacts of proposed activities; identify ways that potential significant environmental impact(s) can be avoided or significantly reduced; and, prevent significant avoidable damage to the environment by requiring changes in the project through alternatives and mitigation. Constructing a silhouette of the proposed structures to be in place during the DEIR review and comment period will allow concerned parties to be more enlightened to the impacts that the proposed buildings will have on those elements of the environmental analysis that affect aesthetics (views), land use and planning, noise, population and housing, recreation, and mandatory findings of significance.

Specifically, with respect to size and massing of the structures, a silhouette in conjunction with the DEIR review and comment period will allow for decision makers and the public to address the associated impacts in an enlightened manner rather than based on assumed perceptions of the true size and foot print of the proposed structures. Further, silhouetting will provide a context as to the compatibility of the proposed project with other land uses and structures in the surrounding area and identify if there is excessive massing with insufficient front, rear and side setbacks for the proposed height of the structures.

As stated above, Torrance Municipal Code §92.21.11 requires a silhouette at the time an application is made. While the City has mandated that the applicant silhouette the structures at least 60 days in

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advance of a public hearing in accordance with local zoning codes, there is a nexus between erecting a silhouette and the benefit it would provide during the DEIR public review and comment period.

Although the California Environmental Quality Act (CEQA) does not legally mandate silhouettes during the DEIR process, nothing in CEQA prevents the City of Torrance from requiring the silhouetting and we strongly urge the City of Torrance to require a silhouette of the building outlines in conjunction with the DEIR review and comment period.

Please do what is in the best interest of the public to provide information about the project in a tangible, timely, transparent, comprehensive and inclusionary manner, which is the basis on which the California Environmental Quality Act was created.

Thank you for considering this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Rukavina". The signature is fluid and cursive, with a prominent initial "K" and a long, sweeping underline.

Ken Rukavina, PE

Director of Community Development and Public Works/City Engineer

Copy: Mayor and City Council
City Manager