CEQA Findings of Fact and Statement of Overriding Considerations

Imperial Avalon Mixed-Use Project (SCH No. 2021010116)

NOVEMBER 2022

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ACM	asbestos-containing material
ADA	Americans with Disabilities Act
AFY	acre-feet per year
AQMP	Air Quality Management Plan
BMP	best management practice
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFD	Community Facilities District
CHRIS	California Historical Resources Information System
City	City of Carson
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
County	County of Los Angeles
CRHR	California Register of Historical Resources
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
EECAP	Energy Efficiency Climate Action Plan
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
gpd	gallons per day
HHMD	Health Hazardous Materials Division
HMBP	hazardous materials business plan
HVAC	heating, ventilation, and air conditioning
IASP	Imperial Avalon Specific Plan
IDIF	Interim Development Impact Fee
JWPCP	Joint Water Pollution Control Plant
LACFD	Los Angeles County Fire Department
LASD	Los Angeles Sheriff's Department
LAUSD	Los Angeles Unified School District

Acronym/Abbreviation	Definition
LBP	lead-based paint
L_{eq}	equivalent continuous sound level
LID	Low Impact Development
L_{max}	maximum continuous sound level
LST	localized significance threshold
MM	mitigation measure
MS4	Municipal Separate Storm Sewer System
NB	northbound
NBL	northbound lane
NOP	Notice of Preparation
NO_X	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
PCB	polychlorinated biphenyl
PDF	Project Design Feature
$PM_{2.5}$	particulate matter smaller than 2.5 microns
PM_{10}	particulate matter smaller than 10 microns
PPV	peak particle velocity
Project Applicant	Imperial Avalon LLC
OPR	Governor's Office of Planning and Research
RHNA	Regional Housing Needs Assessment
RIR	Relocation Impact Report
RTP	Regional Transportation Plan
SB	Senate Bill
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Government
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SO_x	sulfur oxide
SWPPP	stormwater pollution prevention plan
TAZ	Traffic Analysis Zone
TCR	tribal cultural resource
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compound
WSA	Water Supply Assessment

1 CEQA Findings

Having received, reviewed, and considered the following information as well as all other information in the record of proceedings on this manner, the City of Carson hereby finds, determines and declares as follows:

1.1 CEQA Process

Pursuant to the California Environmental Quality Act, Public Resources Code Section 21000 et seq. (CEQA), the City of Carson (City) acting as Lead Agency, determined that the preparation of an environmental impact report (EIR) would be the appropriate approach for the analysis of the proposed Project (defined below) proposed by Imperial Avalon LLC (Project Applicant).

During the planning process, a Draft EIR was prepared for the Project. Upon review of the alternatives required to be examined under CEQA, City staff requested additional information from the Project Applicant regarding Alternative 3, the Reduced Density and Sensitive Transition Alternative, and then recommend the alternative to be forwarded to the City's decision-makes for their consideration in lieu of the Project as originally proposed. After consultation between the Project Applicant and City staff, the Project Applicant has agreed to proceed with bringing Alternative 3 forward to the City's decision-makers for their consideration in lieu of the Project. Alternative 3 was discussed within the Draft EIR and Errata to the Final EIR. Generally, this alternative involves a development similar to and within the same footprint as the Project, but involving a lower density residential component and at a smaller scale. The Draft EIR found that the impacts of Alternative 3 would be the same or of a lesser magnitude than the impacts of the Project. Therefore, the following findings apply both the Project and Alternative 3.

A Notice of Preparation (NOP) for the Draft EIR was circulated for a 30-day review period starting on January 13, 2021 and ending on February 12, 2021. In addition, a public scoping meeting was conducted on Thursday, January 28, 2021, at 6:00 p.m. via Zoom. Appendix A of the Draft EIR includes copies of written comments submitted to the Planning Department in response to the NOP and at the public scoping meeting.

The City released the Draft EIR for review and comment between August 4, 2022 and October 28, 2022. The NOA indicated that the Draft EIR was available for public review and comment for a 45-day public review period. During the 45-day comment period, it was brought to the City's attention that some parties were inadvertently left off of the public distribution list, namely surrounding jurisdictions, applicable agencies, and some parties who previously requested to be added to the project's distribution list. On September 14, 2022, during the 45-day public review period, the City circulated notices to these remaining parties and indicated that the City would accept comments on the Draft EIR period for an additional 45-day period.

The lead agency received four written comments on the Draft EIR, two from public agencies and two from groups/individuals, and responses to these comments are included in the Final Environmental Impact Report (State Clearinghouse No. 2021010116) dated November 2022 (Final EIR). The City provided responses to comments submitted by public agencies via email and FedEx delivery on November 10, 2022. An errata to the Final EIR was also prepared by the City in November 2022.

The Final EIR, including the Errata to the Final EIR, has been completed in compliance with CEQA, in connection with the approval by the City of the entitlements and other approvals required for the development of Alternative 3.

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2 Project Description

The Project site is in the City of Carson, which is located in the South Bay/Harbor area of the County of Los Angeles (County). The approximately 27.31-acre Project site is in the northeast corner of the City, immediately southwest of I-405. The Project site is bound by the concrete-lined Torrance Lateral Drainage Canal to the north, South Avalon Boulevard to the east, East 213 Street to the south, and Grace Avenue to the west. Specifically, the Project site is located at 21207 South Avalon Boulevard, Carson, California 90745. The Project site is comprised of five Assessor's Parcel Numbers (APNs): 7337-001-025, -026, -027, -028, and -029.

The Project site is currently developed with the Imperial Avalon Mobile Estates mobile home park (Mobile Home Park). The Mobile Home Park opened in 1975 and contains 228 spaces for mobile homes, of which 225 were occupied at the time of the Notice of Preparation of the Draft EIR, a recreational vehicle storage yard with over 20 spaces, and a common area including a clubhouse, grass field, recreation building, swimming pool, and guest parking spaces.

In September 2019, the owner of the Mobile Home Park, Imperial Avalon, LLC (Mobile Home Park Owner; the Mobile Home Park Owner is also the Project Applicant), notified Mobile Home Park residents of its intention to close the Mobile Home Park. Closures of mobile home parks within the City are subject to Carson Municipal Code Section 9128.21, which requires the preparation of a Relocation Impact Report (RIR) which requires that park owners take reasonable measures to reduce the adverse impact of a closure on the ability of park residents to find alternative housing. After compliance with Carson Municipal Code Section 9128.21 and approval of a RIR by the Carson Planning Commission (or the City Council, if the Planning Commission's approval of a RIR is appealed), park owners have a property right under State law to close a park at their discretion, subject to issuance of a 6-month notice of termination of the residents' tenancies in their space leases. The Mobile Home Park Owner completed its application for approval of a RIR, RIR No. 05-20, in April of 2020 by filing its RIR. A Planning Commission hearing to consider the RIR was conducted on May 13, 2020. At this hearing, the Planning Commission approved RIR No. 05-20 and associated measures with special conditions. This decision was subsequently appealed to the City Council, by adoption of Resolution No. 20-113. On July 7, 2020 the City Council affirmed the Planning Commission's approval of RIR No. 05-20 and imposed additional conditions and relocation requirements. A Notice of Exemption for the RIR was filed with the Los Angeles County Clerk-Recorder on July 7, 2020 and was posted for a 30-day period from July 17, 2020 through August 17, 2020. No challenges to the City's approval of the RIR were timely filed.

Generally, the Project would involve removal of the existing site improvements and construction of a mixed-use neighborhood containing multifamily residences, townhomes, neighborhood-serving commercial uses, open space, and parking.

During the process in which the City was preparing to bring forth the Project to the City's decision-makers for consideration, City staff worked with the Project Applicant to identify ways to meet the Project Objectives while also being sensitive to concerns raised during the planning process about the Project's density, scale, and compatibility with the surrounding neighborhood. After due deliberation between City Staff and Project Applicant, the Project Applicant has agreed to proceed with bringing Alternative 3, the Reduced Density and Sensitive Transition Alternative, forward to the City's decision-makers for their consideration in lieu of the Project. Alternative 3 was environmentally assessed and discussed within the Draft EIR and Errata to the Final EIR. Generally, this alternative

involves a development similar to and within the same footprint as the Project, but involving a lower density residential component and at a smaller scale.

Alternative 3, as described in the Draft EIR and with additional information provided in the Errata to the Final EIR, is discussed below.

Alternative 3 involves (1) the adoption of the Imperial Avalon Specific Plan (IASP), which would establish a new regulating plan within the IASP area (Project site) and allow for the development of residential, commercial, recreational/open space uses, and (2) implementation of the IASP through the development of a specific development proposal, which involves relocation or disposal of existing mobile home coaches, demolition of other existing on-site structures, and the development of a mixed-use neighborhood containing multifamily residences, townhomes, neighborhood-serving commercial uses, open space and recreation opportunities, and associated parking areas. Collectively, the IASP and implementation of the specific development proposal constitute Alternative 3. Thus, Alternative 3, as evaluated in the EIR and the Errata to the Final EIR, would involve (1) a General Plan Amendment to change the Project site's General Plan Land Use Designation from Regional Commercial and Low Density Residential to Urban Residential, (2) a zone change to change the Project site's zoning from Commercial, Automotive and RM-8-D zone to Specific Plan, (3) adoption of the IASP, (4) site plan and design review and (5) a tentative tract map to facilitate the construction of the proposed development, and (6) approval of a development agreement.

Alternative 3 would consist of 681 non-age restricted apartment units, 83 apartment units that will be rented to seniors, 323 attached townhome units and 28 detached townhome units. The remaining attached townhome units would also be set back further away from existing residences along the southwest and south property line. The development generally consists of two interconnected halves where the western portion of the site would be developed with for-sale three-story townhomes, and the eastern half of the site would be developed with multistory mixed-use buildings of up to six stories. The multistory mixed-use buildings would provide a mix of services, restaurants, open space/recreation, and a range of multifamily housing types, including senior living. The IASP would also require that the Project provide an affordable housing benefit to the City which could be satisfied either by providing deed restricted affordable units on-site, off-site, or through payment of an in-lieu fee to be negotiated through a Development Agreement. The various housing types across the entire site would form an integrated community connected by public and private open spaces, including an approximately 23,000-square-foot park and dog park, as well as walkable paseos, and plaza spaces.

Subject to Los Angeles County Flood Control review and approval, an accessible pedestrian bridge (American with Disabilities Act (ADA) compliant) over the Torrance Lateral Drainage Canal to the north of the site has been proposed to provide pedestrian connectivity between the future development located within the District Specific Plan Area to the north. The bridge would provide both pedestrian and bicycle access. In particular, the pedestrian bridge would connect the Project site with the Carson Country Mart (approved under the District at South Bay 2021 project), which includes a mix of neighborhood commercial and recreational uses.

Additionally, Alternative 3 would include several Project Design Features (PDFs). These PDFs will be required of Alternative 3 per conditions of approval. PDFs will be tracked and monitored throughout the life of Alternative 3.

3 Findings

3.1 Required CEQA Findings

California Public Resources Code Section 21081 and CEQA Guidelines Section 15091 require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more of three possible findings for each of the significant impacts.

1. The first possible finding is that "changes or alterations have been required in, or incorporated into, the project which avoided or substantially lessen the significant environmental effects as identified in the final EIR." (CEQA Guidelines Section 15091(a)(1); Public Resources Code Section 21081(a)(1)).
2. The second possible finding is that "such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (CEQA Guidelines Section 15091(a)(2); Public Resources Code Section 21081(a)(2)).
3. The third possible finding is that "specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible, the mitigation measures or project alternatives identified in the final EIR." (CEQA Guidelines Section 15091(a)(3); Public Resources Code Section 21081(a)(3)).

The City of Carson served as the Lead Agency under CEQA with respect to the EIR. In considering its approval of Alternative 3 and making these findings, the City has assessed all of the information in the administrative record of proceedings, including but not limited to: the applications for approvals, City staff reports, all public comments received both written and verbal, the DEIR, the Final EIR, and the Errata to the Final EIR. On the basis of all the foregoing information, the City finds:

1. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment as identified in the Final EIR; and
2. The Final EIR has been completed in compliance with CEQA and is adequate under CEQA for approval of the actions necessary to implement the project and all other City permits, entitlements, and discretionary approvals for the project; and
3. Alternative 3 would not reduce the Project's significant environmental impact to a level of less-than-significant, but it would reduce the magnitude of many of the Project's impacts, including the significant and unavoidable construction noise impact (but not to below a level of significance), as well as many of the Project's already less-than-significant impacts. No other Project alternatives were found to reduce or avoid the Project's significant environmental impacts. Other Project alternatives identified during the Draft EIR process were rejected as infeasible, for the reasons set forth in Section 3.6, Alternatives, below.

3.1 EIR Evaluation of Impacts

The EIR evaluated the following potential project and cumulative environmental impact areas: Aesthetics; Air Quality; Cultural and Tribal Cultural Resources; Energy; Geology and Soils; Greenhouse Gas Emissions; Hazards and

Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Population and Housing; Public Services and Recreation; Transportation; and Utilities and Service Systems.

Additionally, the EIR considered Significant Irreversible Environmental Changes, Growth Inducing Impacts, and potential secondary effects of the Project. The significant environmental impacts of the Project, including cumulative environmental impacts of the Project and the significant environmental effects of each of the alternatives of the Project, were also identified in the EIR.

The severity of environmental impacts are grouped into four categories: (1) Impacts not reasonably likely to occur such that no further environmental impact analysis is warranted; (2) Impacts are less than significant without the need to implement and require mitigation measures; (3) Impacts that are potentially significant but are reduced to less-than-significant levels with the implementation of mitigation measures; and (4) Significant and unavoidable impacts that will remain significant despite implementation of all feasible mitigation intended to reduce the severity of the impact.

As with the Project, Alternative 3 would include adoption of a specific plan that is consistent with the development proposed. Notably, Alternative 3 would provide a more gradual and sensitive transition between the higher-density apartment component of the development and the existing single-family residential neighborhood to the west of the Site across Grace Avenue by placing detached townhome housing that is more consistent with the scale and spacing of the residential neighborhoods immediately adjacent to the area, as compared to the attached, more densely configured, townhomes proposed on the western boundary of the Site.

Chapter 6 of the Draft EIR includes a detailed comparison of the environmental impacts of Alternative 3 and the Project. Much of this analysis was based on a comparison between the intensities of the two developments. Because Alternative 3 would result in a less-intense development than the Project, Alternative 3 was found to reduce the magnitude of many of the Project's impacts. Specifically, a trip generation table was prepared to compare the trip generation of the Project and Alternative 3. Given that Alternative 3 has been slightly modified since circulation of the Draft EIR, a new trip generation analysis has been prepared for the revised Alternative 3. This trip generation analysis is included as Attachment A to the Errata of the Final EIR, Revised Alternative 3 Trip Generation Table. As indicated within Attachment A, the revised Alternative 3 would result in development that generates fewer net trips than both the Project and Alternative 3 as originally presented in the Draft EIR. Thus, it stands to follow that the operational environmental effects of the revised Alternative 3 would be the same or of a slightly lesser magnitude than the environmental effects of the original Alternative 3. Notably, the revised Alternative 3 would not eliminate the Project's sole significant and unavoidable short-term construction noise impact, despite implementation of mitigation. However, it would still reduce the magnitude of many of the Project's already less-than-significant impacts.

3.2 No Further Environmental Review Required

Pursuant to CEQA Guidelines Section 15128, substantial evidence in the administrative record shows that impacts of the Project and Alternative 3 are not reasonably likely to occur with respect to the following impact areas and that no further environmental impact analysis is warranted: Agriculture and Forestry Resources; Biological Resources; Mineral Resources; and Wildfire.

3.3 Construction Noise Impacts are Significant and Unavoidable; Remaining Impacts of the Project are Less Than Significant.

Substantial evidence in the administrative record shows that the Project and Alternative 3 would result in a significant and unavoidable impact in Construction Noise.

Except for Construction Noise, substantial evidence in the administrative record shows that all other impacts are either less than significant without mitigation or potentially significant but are reduced to less-than-significant levels with the implementation of mitigation measures set forth in the Mitigation Monitoring and Reporting Program, as further described below. All of the relevant mitigation measures set forth in the Final EIR would be implemented and enforced as set forth therein and in the Mitigation Monitoring and Reporting Program and required as conditions of approval. Notwithstanding the foregoing, the Final EIR determines and the City finds that Construction Noise impacts are significant and unavoidable, and have a significant and unavoidable impact despite implementation of all feasible mitigation intended to reduce the severity of the impact.

3.4 Impact Area Findings

The following analysis was based on the Project Description in the Draft EIR. As described in Section 2 of this document, the City's decided to select Alternative 3, which consists of a reduced density version of the Project described in the Draft EIR with a more sensitive transition to the single-family homes to the west.

The environmental impacts of Alternative 3 were discussed within Chapter 6 of the Draft EIR. The Draft EIR concluded and the City finds that the impacts of the Project and Alternative 3 summarized below would either remain consistent with the Draft EIR analysis, or would be lessened.

3.4.1 Aesthetics

a. Have a substantial adverse effect on a scenic vista?

Facts

The City's General Plan does not identify any officially designated scenic vistas within City boundaries (City of Carson 2004). Further, the County General Plan does not identify any officially designated scenic vistas for conservation purposes (County of Los Angeles 2015). Land forms in the County that could be considered valued scenic resources include mountain ranges, such as the San Gabriel, Santa Susana, and Santa Monica Mountains; hills, such as the Chino, Palos Verdes, and Simi Hills; the coastline and Pacific Ocean. The Palos Verdes Peninsula is the nearest prominent landform to the Project site, located approximately 5.5 miles to the southwest. These hills, open space, and communities abutting cliffs and rocky shoreline are not visible from the Project site due to the distance and intervening development. As such, although the Project would result in visual changes on the Project site due to an increase in building height, massing and scale, and increased intensity of use, these changes would not adversely affect a scenic vista. Therefore, impacts related to scenic vistas would be less than significant. In addition, because

there are no scenic vistas located within the City, and views of the Palos Verdes Peninsula from other development projects in the Project vicinity would be at a similar distance (approximately 5.5 miles) to that of the proposed Project, the Project would not result in a cumulative impact to scenic vistas.

Alternative 3 is located on the same site as the Project and is proposed at a lesser intensity than the Project. Thus, Alternative 3 would similarly not result in significant impacts with regard to scenic vistas.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts with regard to aesthetics (scenic vistas) would be less than significant.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Facts

There are no state designated scenic highways within City boundaries (Caltrans 2021). Further, due to distance and intervening development and terrain, none of the County's officially designated (Route 2 and Route 27) or eligible scenic highways are visible from the Project site, nor is the Project site visible from these highways. Therefore, the Project would not substantially damage scenic resources within a state scenic highway and no impact would occur with regard to damaging scenic resources within a state scenic highway.

Additionally, because the Project is not located within the vicinity of a state scenic highway, no cumulative impacts to damaging scenic resources within a scenic highway would occur.

Alternative 3 is located on the same site as the Project and is proposed at a lesser intensity than the Project. Thus, Alternative 3 would similarly not result in significant impacts with regard to state scenic highway.

Finding

The City finds based on substantial evidence that no project-level and cumulative impacts with regard to aesthetics (scenic highway) would occur.

c. In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Facts

California Public Resources Code Section 21071 defines an "urbanized area" as "(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." Population projections developed by

Southern California Association of Governments indicate that the City's 2020 population is approximately 96,100 people. However, the City is adjacent to the City of Los Angeles to the northwest, south, and southeast, the City of Compton to the northeast, and the City of Long Beach to the east. The combined population of the City and any one of these adjacent Cities is well over 100,000 persons. Therefore, the following analysis considers whether the Project would conflict with applicable zoning or other regulations governing scenic quality.

With regards to local plans and policies, under existing conditions, the Project site is subject to the City's General Plan and Zoning Code. The Project involves the adoption of the IASP, which would establish a new regulatory framework within the IASP area. As discussed in Section 3.5.11, Land Use and Planning, approval of the IASP and implementation of the Project would require a General Plan Amendment and a Zoning Code Change.

The General Plan Amendment would change the Project site's General Plan designation from Regional Commercial and Low Density Residential to Urban Residential.

The Zoning Code Change would change the Project site's zoning designation from Commercial Automotive and RM-8-D zone to "Imperial Avalon Specific Plan." Upon adoption by ordinance, the IASP would constitute the zoning for the Project site, and the land use and development standards identified in the IASP would supersede all zoning regulations to the extent that they would be in conflict with the sections of the IASP.

Thus, because the Project involves the adoption of a specific plan, which would then prescribe the development standards pertaining to development standards within the IASP area, the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. Development occurring within the Project site would be required to follow the design guidelines of the IASP, which would serve as the guiding document pertaining to development within the Project site. Impacts would be less than significant.

Additionally, the Project would be a high-quality development that would be of a consistent character with the rest of the area, including Carson Street and Avalon Boulevard areas. Thus, Project development would be required to comply with City regulations, ensuring cumulative aesthetic impacts would remain less than significant.

Alternative 3 would involve the adoption of the same Specific Plan that is proposed by the Project, albeit with a development that features a reduced density and fewer residential units. Upon adoption, the Specific Plan would constitute the zoning for the Project site, and the land use and development standards identified in the Specific Plan would supersede all zoning regulations to the extent that they would be in conflict with the sections of the Specific Plan. Both the developments contemplated under Project and Alternative 3 would be required to confirm with all Specific Plan development standards, and thus, would not result in significant impacts related to conflicts with applicable zoning or other regulations governing scenic quality.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts with regard to aesthetics (scenic quality) would be less than significant

d. Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Facts

Existing sources of light and glare in the Project area are typical of an urban area, including streetlights, exterior parking lot light, exterior security and safety lighting, illuminated signage, interior and exterior building lighting, and landscape lighting. The existing light sources within the Project site are typical of a mobile-home or residential development (i.e., lamp posts, interior and exterior building lights, and landscape lighting). Thus, although the Project would remove the existing lighting source within the Project site, and would introduce new sources of nighttime lighting, including new exterior light fixtures required for safety, security, and aesthetic purposes for a mixed-use development, the Project would not create a new source of lighting or glare that would be substantial in comparison to the existing setting and surrounding area. Pursuant to Municipal Code Section 9127.1, all exterior lighting installed on the Project site must be directed away from all adjoining and nearby residential property and arranged and controlled so it would not create a nuisance or hazard to traffic or to the living environment. As such, all exterior lighting would be shielded and/or recessed to reduce light trespass (i.e., excessive or unwanted light generated on one property illuminating another property). Therefore, based on compliance with local requirements, impacts associated with light and nighttime glare would be less than significant.

Additionally, cumulative development within the Project vicinity would be subject to Municipal Code Section 9127.1, as it relates to light and glare development requirements. Therefore, the Project would not result in a cumulative impact to light and glare.

Alternative 3, like the Project, would also be required to comply with Municipal Code Section 9127.1, and would similarly result in less than significant impacts with regard to light and glare.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts with regard to aesthetics (light and glare) would be less than significant

3.4.2 Agriculture and Forestry Resources

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Facts

The Project site is located in a highly developed part of the City, with the vast majority of the area containing paved surfaces and manmade structures. No readily available opportunities for agricultural or forestry operations exist on site or in the surrounding area. According to the California Department of Conservation's California Important Farmland Finder, most of Los Angeles County, including the City of Carson, is not mapped as part of the state's Farmland Mapping and Monitoring Program; thus, the Project site does not contain Prime Farmland, Unique Farmland, or Farmland of State Importance (collectively "Important Farmland") (DOC 2020), nor does it contain any parcels under a Williamson Act contract (DOC 2018). Additionally, according to the land cover map produced by the California Department of Forestry and Fire Protection, neither the Project site nor the surrounding area are identified as forestland or timberland. Therefore, impacts associated with agricultural and forestry resources would not occur.

Alternative 3 is located on the same site as the Project and is proposed at a lesser intensity than the Project. Thus, Alternative 3 would similarly not result in significant impacts with regard to agricultural and forestry resources.

Finding

The City finds based on substantial evidence that project-level and cumulative agricultural and forestry resources impacts would not occur.

3.4.3 Air Quality

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Facts

As part of its enforcement responsibilities, the U.S. Environmental Protection Agency (EPA) requires that each state with nonattainment areas prepare and submit a SIP that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the California Clean Air Act requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project site is located within the South Coast Air Basin (SCAB), which is under South Coast Air Quality Management District's (SCAQMD) jurisdiction. The SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which SCAB is in non-attainment. To reduce such emissions, the SCAQMD drafted the 2016 Air Quality Management Plan (AQMP). The 2016 AQMP establishes a program

of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, the California Air Resources Board (CARB), the SCAG, and the EPA. The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's 2016 RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMP.

Criteria for determining consistency with the AQMP are defined by the following indicators:

- Consistency Criterion No. 1: A proposed project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of the AQMP's air quality standards or the interim emissions reductions.
- Consistency Criterion No. 2: A proposed project would not exceed the AQMP's assumptions or increments based on the years of the project build-out phase.

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with California Ambient Air Quality Standards and National Ambient Air Quality Standards.

Consistency Criterion No. 1 refers to the California Ambient Air Quality Standards and National Ambient Air Quality Standards. The Project's construction emissions would be below SCAQMD's thresholds while operational emissions would not exceed SCAQMD thresholds with the implementation of project design features. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standards. Therefore, no significant impact is expected, and the Project would be consistent with the first criterion.

Consistency Criterion No. 2 refers to SCAG's growth forecasts and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities located within the SCAG region. Therefore, projects that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

Concerning Consistency Criterion No. 2, it is important to recognize that air quality planning within the SCAB focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the project exceeds the assumptions utilized in preparing the forecasts presented in the 2016 AQMP. Determining whether or not a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the following criterion.

A project is consistent with the 2016 AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the 2016 AQMP. In the case of the 2016 AQMP, three sources of data form the basis for the projections of air pollutant emissions: the City's General

Plan, SCAG's regional growth forecast, and the SCAG 2016–2040 RTP/SCS. The 2016–2040 RTP/SCS also provides socioeconomic forecast projections of regional population growth.

The General Plan designates the Project site for two different uses, Regional Commercial (RC) and Low Density Residential (LDR). The Project site is zoned Commercial, Automotive and RM-8-D. Per the City's Zoning Code, "D" identifies a Design Overlay designation, created "primarily to provide for Site Plan and Design Review of future development within the designated areas in order to achieve special standards of design, architectural quality, style and compatibility, landscape treatment, and functional integration of neighboring developments."

The Project proposes a mixed-use development in accordance with the Imperial Avalon Specific Plan (IASP). The IASP will codify the development standards, design guidelines and implementation strategies for the Project. The uses permitted in the IASP would include residential, commercial, and independent living units for senior residents. The Project would require General Plan and Zoning Code Amendments to accommodate the Specific Plan. Therefore, the proposed Project would be consistent with the General Plan and Zoning Code upon Project approval.

The City's population estimate, as of January 2021, is 91,668 persons. The Project would induce population growth directly through the construction of 1,213 residential units. Assuming 100% occupancy, the maximum population growth associated with Project implementation would be approximately 3,042 persons.[1] This growth would not cause SCAG's 2027 population forecast of 99,880 persons for the City to be exceeded (SCAG 2019). As the Project would not cause SCAG's 2027 population forecast to be exceeded, the Project would not cause the City's General Plan buildout population forecast to be exceeded. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. Additionally, as the SCAQMD has incorporated these same projections into the 2016 AQMP, it can be concluded that the proposed Project would be consistent with the projections.

The Project would implement various SCAG policies and would be consistent with the SCAG 2016–2040 RTP/SCS. The 2016–2040 RTP/SCS contains measures to achieve vehicle miles traveled (VMT) reductions required under Senate Bill 375.[2] The proposed Project is a mixed-use project located within a developed portion of the City and would be within 0.25 miles of a bus stop (i.e., Metro Avalon/213th bus stop), which would incentivize residents to take public transportation, would lower criteria pollutant emissions and is consistent with the goals of Senate Bill 375. In addition, the Project would be consistent with the land use envisioned in the IASP and General Plan with a General Plan amendment. As such, the proposed Project meets this AQMP consistency criterion.

SCAQMD is currently working on the next iteration of the AQMP, the 2022 Air Quality Management Plan (2022 AQMP). The 2022 AQMP will incorporate the recently adopted SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS). However, until the

1 Refer to the Transportation Impact Study, for population factor calculation.

2 Senate Bill 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle greenhouse gas emissions. Under Senate Bill 375, CARB is required, in consultation with the state's Metropolitan Planning Organizations, to set regional greenhouse gas reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.

adoption of the 2022 AQMP, Project AQMP consistency will be analyzed off the 2016 AQMP and the RTP/SCS that was adopted at the time, the 2016–2040 RTP/SCS.

In conclusion, the determination of 2016 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the SCAB. The proposed Project would not result in a long-term impact on the region's ability to meet state and federal air quality standards with implementation of Project Design Feature (PDF)-AQ-1. Also, the proposed Project would be consistent with the goals and policies of the 2016 AQMP for control of fugitive dust. As previously discussed, the proposed Project's long-term influence would also be consistent with the SCAQMD and SCAG's goals and policies and is, therefore, considered consistent with the 2016 AQMP. Therefore, the Project would be consistent with this criterion and impacts would be less-than-significant.

Alternative 3 would involve similar construction elements and duration to the Project. As such, construction-related air quality impacts under Alternative 3 would be less than significant, similar the Project. During operation, trip generation and energy usage would be slightly lower under Alternative 3 due to the slightly lower number of residential units and total residential square footage. As such, although operation-related air quality impacts under the Project were determined to be less than significant, they would be reduced under Alternative 3. Therefore, Alternative 3 would be consistent with the 2016 AQMP and impacts would be less-than-significant.

Finding

The City finds based on substantial evidence that project-level and cumulative air quality impacts (conflict with plan) would be less than significant.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Facts

Short-Term Construction

Short-term air quality impacts are predicted to occur during demolition, grading, construction, paving, and architectural coating operations associated with implementation of the proposed Project. Temporary air emissions would result from the following activities:

- Particulate (fugitive dust) emissions from grading and building construction
- Exhaust emissions from the construction equipment, hauling trucks, and motor vehicles of the construction crew

The Project proposes to demolish an existing mobile home park and construct a mixed-use development. Construction activities are anticipated to start in February 2022 and would take approximately 60 months to complete. It is anticipated that approximately 322,308 square feet of building area would be demolished. Earthwork activities would require approximately 24,827 cubic yards of cut and 123,246 cubic yards of fill, as well as approximately 120,000 cubic yards of import. No export is anticipated. Construction activities would include temporary shoring during the grading phase, off-site utility and signalized intersection improvements during the paving phase, pedestrian bridge construction during the building construction and paving phase, and vapor barrier installation during the building construction phase. Emissions for each

construction phase have been quantified based upon the phase durations and equipment types. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod) version 2016.3.2.[3]

Fugitive Dust Emissions

Construction activities are a source of fugitive dust (PM_{10} and $PM_{2.5}$) emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from demolition, grading, and construction is expected to be short-term and would cease upon Project completion. Additionally, most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. The amount of PM_{10} (particulate matter smaller than 10 microns) generated as a part of fugitive dust emissions is a particular health concern. PM_{10} poses a serious health hazard alone or in combination with other pollutants. $PM_{2.5}$ (particulate matter smaller than 2.5 microns) is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as oxides of nitrogen (NO_X) and sulfur oxides (SO_X) combining with ammonia. $PM_{2.5}$ components from material in the earth's crust, such as dust, are also present, with the amount varying in different locations.

Total PM_{10} and $PM_{2.5}$ emissions would be below SCAQMD thresholds. Therefore, particulate matter impacts during construction would be less than significant.

Volatile Organic Compound (VOC) Emissions[4]

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates VOC emissions, which are O_3 precursors. In accordance with the methodology prescribed by the SCAQMD, the VOC emissions associated with paving have been quantified with CalEEMod. Architectural coatings were also quantified with CalEEMod based upon the size of the buildings.

[3] While there is a new version of CalEEMod, CalEEMod 2016.3.2 was the version in place at the time of the posting of the NOP. The analyses prepared under CalEEMod 2016.3.2 are generally more conservative than those prepared under CalEEMod 2020.4.0. The older model was based on CARB's EMFAC2014 emissions model, which did not capture more recent advanced clean car regulations adopted after 2015 and the accelerated phase-in of partial Zero Emission Vehicles. In addition, CalEEMod 2016.3.2 did not factor in California's 2019 Title 24 standards, which have more stringent energy standards that reduce energy-related emissions from electricity and natural gas use.

[4] Reactive organic gases and VOCs are subsets of organic gases that are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. Although they represent slightly different subsets of organic gases, they are used interchangeably for the purposes of this analysis.

The highest concentration of VOC emissions would be generated during the application of architectural coatings on the buildings. As required by SCAQMD, all architectural coatings for the proposed Project structures would comply with SCAQMD Regulation XI, Rule 1113 – Architectural Coating. Rule 1113 provides specifications on painting practices as well as regulates the VOC content of paint (SCAQMD 2016a). Project construction would not result in an exceedance of VOC emissions during any years of construction. Therefore, impacts would be less than significant in this regard.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the Project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to and from the site. The majority of construction equipment and vehicles would be diesel powered, which tends to be more efficient than gasoline-powered equipment. Diesel-powered equipment produces lower carbon monoxide and hydrocarbon emissions than gasoline equipment, but produces greater amounts of NO_X, SO_X, and particulates per hour of activity (Sullivan et al. 2004). Unmitigated construction equipment, truck and worker vehicle exhaust emissions would not exceed SCAQMD thresholds. Notwithstanding, the Project would implement PDF-AQ-1 to further reduce construction emissions. PDF-AQ-1 would require that all diesel-fueled construction equipment greater than 50 horsepower meet EPA-certified Tier 4 Interim/Final emissions standards during all phases of construction. Tier 4 Interim/Final standards regulate the amount of NO_X, carbon monoxide (CO), PM_{10}, and $PM_{2.5}$ emissions from nonroad (or off-road) diesel engines. Tier 4 Interim/Final standards require emissions of NO_X, PM_{10}, and $PM_{2.5}$ to be reduced by 90 percent from Tier 1-3 standards. Compared to the previously adopted Tier 1-3 standards, the use of control technologies such as exhaust gas aftertreatment (oxidation catalysts) in addition to advanced engine design allows the more stringent Tier 4 standards to be met (OFR 2021; ICCT 2021). Further, standard SCAQMD regulations, such as maintaining all construction equipment in proper tune, shutting down equipment when not in use for extended periods of time, and implementing SCAQMD Rule 403 would be adhered to. Construction equipment exhaust would not exceed SCAQMD thresholds with implementation of PDF-1. Therefore, impacts are less than significant in this regard.

Overall Construction Emissions

CalEEMod was used to model construction emissions for VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Unmitigated construction emissions would not exceed SCAQMD thresholds for any criteria pollutants. Further, the Project would implement PDF-AQ-1 to further reduce construction emissions. As such, construction emissions would be less than significant.

Long-Term Operations

Operational emissions generated by both stationary and mobile sources would result from normal daily activities on the Project site after occupation (i.e., increased concentrations of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$). Mobile source emissions would be generated by the motor vehicles traveling to and from the Project site. Stationary area source emissions would be generated by consumption of natural gas for space and water heating devices, operation of landscape maintenance equipment, and use of consumer products. Stationary energy emissions would result from natural gas consumption associated with the

Project. Analysis of mobile emissions is based primarily upon the Imperial Avalon Project Local Transportation Assessment (Transportation Assessment) prepared by Fehr and Peers. The analysis of daily operational emissions has been prepared using CalEEMod. CalEEMod model runs were conducted for both the existing conditions and the proposed Project. Further, vehicle emission factors were taken from CARB's 2017 Emission Factor (EMFAC2017) model.

Existing Operational Emissions

The existing Project site is currently developed with the Imperial Avalon Mobile Estates mobile home park (Mobile Home Park), which consists of 225 mobile home coaches, a recreational vehicle storage yard, and a common area with a clubhouse, grass field, recreation building, swimming pool, and guest parking spaces. A CalEEMod model run was conducted to quantify the existing operational emissions from the Mobile Home Park. Trip generation rates associated with the existing use were based on the Transportation Assessment. According to the Transportation Assessment, the existing Project site generates approximately 1,141 mobile daily trips.

Project Operational Emissions

The proposed Project would construct a mixed-use development consisting of approximately 10,352 square feet of café/restaurant space and 1,213 residential units, as well as residential amenities and open space areas. The net operation emissions were calculated by subtracting the existing use emissions from the proposed Project emissions. The proposed Project would include operational emission reductions from the most current building energy efficiency standards—the 2019 Title 24 and 2019 California Green Building Standards Code (CALGreen), including installation of photovoltaic solar panels and electric vehicle charging stations. Net operational emissions would not exceed SCAQMD thresholds.

Mobile Source Emissions

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, VOC, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and VOC react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions have been estimated using EMFAC2017 and CalEEMod. Trip generation rates associated with the Project were based on the Transportation Assessment. According to the Transportation Assessment, the proposed Project would generate approximately 6,727 daily trips. Emissions generated by vehicle traffic associated with the proposed Project would not exceed established SCAQMD regional thresholds.

Area Source Emissions

Area source emissions would be generated due to an increased demand for consumer products, architectural coating, and landscaping associated with the proposed Project. The proposed Project would not include wood burning fireplaces or other devices per SCAQMD Rule 445 (Wood Burning Devices). Area

source emissions from the proposed Project would not exceed SCAQMD thresholds for VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$.

Energy Source Emissions

Energy source emissions would be generated as a result of electricity and natural gas (non-hearth) usage associated with the proposed Project. The primary use of electricity and natural gas by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. Energy source emissions from the proposed Project would not exceed SCAQMD thresholds for VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$.

Overall Operational Emissions

Net operational emissions from the proposed Project would not exceed SCAQMD thresholds. Thus, long-term operational air emissions impacts would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant.

Alternative 3 would involve similar construction elements and duration to the Project. As such, construction-related air quality impacts under Alternative 3 would be less than significant, similar the Project. During operation, trip generation and energy usage would be slightly lower under Alternative 3 due to the slightly lower number of residential units and total residential square footage. As such, although operation-related air quality impacts under the Project were determined to be less than significant, they would be reduced under Alternative 3.

Finding

The City finds based on substantial evidence that project-level and cumulative air quality impacts (criteria pollutants) would be less than significant.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Facts

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

The closest sensitive receptors are single-family and multifamily residential uses adjoining the Project site to the south and west. In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing localized significance thresholds (LST) for construction and operations impacts (area sources only). The CO hot spot analysis following the LST analysis addresses localized mobile source impacts.

Localized Significance Thresholds

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I- 4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST screening lookup tables for 1-, 2-, and 5-acre projects emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The Project is located within SRA 4, South Coastal Los Angeles County.

Short-Term Construction

The SCAQMD guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day. SCAQMD provides LST thresholds for 1-, 2-, and 5-acre site disturbance areas; SCAQMD does not provide LST thresholds for projects over 5 acres. Based on information obtained from CalEEMod, the Project is anticipated to disturb up to 1,200 acres during the grading phase.[5] The grading phase would take approximately 240 days in total to complete. As such, the Project would actively disturb approximately 5 acres per day (240 days x 5 acres/day). Therefore, the LST thresholds for 5 acres were used for the construction LST analysis.

The closest sensitive receptors are residential uses adjoining the Project site to the south and west. These sensitive land uses may be potentially affected by air pollutant emissions generated during on-site construction activities. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. According to SCAQMD LST Methodology, projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. As the nearest sensitive uses are adjoining the Project site to the south and west, the LST values for 25 meters (82 feet) were used.

As previously discussed, the Project would implement PDF-AQ-1 to reduce PM_{10} construction emissions. PDF-AQ-1 would require that all diesel-fueled construction equipment greater than 50 horsepower meet EPA-certified Tier 4 Interim/Final emissions standards during all phases of construction. Localized construction emissions would not exceed the LSTs for SRA 4. Therefore, localized significance impacts from construction would be less than significant.

Long-Term Operations

According to SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed Project if the Project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). Thus, due to

[5] Per the CalEEMod User's Guide, to properly grade a piece of land, multiple passes with grading equipment may be required; therefore, while the lot size is a fixed number of acres, the total acres graded could be an order of magnitude higher than the footprint of the lot (CAPCOA 2017). Accordingly, CalEEMod estimates the total acres graded during site preparation and grading phases based on the equipment list (including number of equipment), the number of days needed to complete the grading and/or site preparation phase, and the maximum number of acres a given piece of equipment can traverse in an 8-hour workday. Because the Project site is approximately 27.31 acres and was previously developed, the CalEEMod grading assumption is anticipated to be conservative.

the lack of such stationary sources or uses, no long-term LST analysis is necessary. Operational LST impacts would be less than significant in this regard.

Carbon Monoxide Hot Spots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection as a result of the proposed Project would have the potential to result in exceedances of the California Ambient Air Quality Standards or National Ambient Air Quality Standards. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (SCAQMD 2003). The 2003 AQMP is the most recent AQMP that addresses CO concentrations. It should be noted that the Basin was redesignated as attainment/ maintenance in 2007 and is no longer addressed in the SCAQMD's subsequent AQMPs. As part of the 2003 AQMP CO hot-spot analysis, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles, one of the most congested intersections in Southern California with an average daily traffic volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35 ppm federal standard.

As the CO hot spots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, even with 100,000 vehicles daily, it can be reasonably inferred that CO hot spots would not be experienced at any vicinity intersections as a result of vehicle trips added by this Project. According to the Transportation Assessment, the proposed Project would generate 6,727 daily trips with 476 a.m. peak hour trips and 544 p.m. peak hour trips. Therefore, impacts would be less than significant in this regard. Therefore, CO hot spot impacts would be less than significant in this regard.

Air Quality Health Impacts

Criteria Pollutants

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age and gender]). In particular, O_3 precursors, VOCs and NO_X, affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating Project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the Project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the SCAQMD (April 6, 2015) submitted in *Sierra Club vs. County of Fresno* (2018) 6 Cal. 5th 502, the SCAQMD acknowledged it would be extremely difficult, if not

impossible, to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (April 13, 2015) also submitted in *Sierra Club vs. County of Fresno*, San Joaquin Valley Air Pollution Control District acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects quantification from O_3, as an example is correlated with the increases in ambient level of O_3 in the air (concentration) that an individual person breathes. SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient O_3 levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's 2012 Air Quality Management Plan, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O_3 levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3-related health impacts caused by NO_X or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. Thus, as the Project would not exceed SCAQMD thresholds for construction and operational air emissions, the Project would have a less than significant impact for air quality health impacts.

Toxic Air Contaminants

Construction Health Risk Assessment

As previously discussed, Project construction is anticipated to be completed over a period of up to approximately 60 months. Project construction activities are anticipated to involve the operation of diesel-powered equipment, which would emit diesel particulate matter (DPM). In 1998, the CARB identified diesel exhaust as a toxic air contaminant. Cancer health risks associated with exposures to diesel exhaust typically are associated with chronic exposure, in which a 30-year exposure period often is assumed. Project construction would comply with the California Code of Regulations (CCR), Title 13, Section 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to nor more than 5 minutes. In addition, the Project would implement PDF-AQ-1 that would significantly reduce DPM construction exhaust emissions. Furthermore, construction activities are expected to occur well below the 30-year exposure period used in health risk assessments (over a period of 60 months).

A construction health risk assessment was prepared to assess the health risk impacts from exposure to toxic air contaminant emissions generated from construction activities. The health risk assessment quantifies both carcinogenic risks and noncarcinogenic hazards for the maximum exposed residential receptor adjoining the Project site. For on-site construction, off-road PM_{10} exhaust emission estimates were used as a surrogate for DPM emissions.

The air dispersion modeling for the risk assessment was performed using the EPA AERMOD dispersion model. AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the stack heights of the emission sources (not a factor in this case). AERMOD requires hourly meteorological data consisting of wind vector, wind speed, temperature, stability class, and mixing height. Surface and upper air meteorological data was obtained from

CARB. Surface and upper air meteorological data from the Long Beach Airport Monitoring Station was selected as being the most representative for meteorology based on proximity to the Project site.

The model scalar value of 1 was assigned to account for emissions generated during construction related activity corresponding to 8 hours per day as reported in the CalEEMod construction profile from 8 a.m. to 4 p.m. (ending hours 9 to 16). A scalar value of 0 was used for non-operational hours. Residential receptors were placed immediately west and south of the Project site and assigned flagpole heights of two meters.

To effectively quantify dose, the procedure requires the incorporation of several discrete exposure variates. To account for upper-bound exposures associated with residential occupancies, lifetime risk values were adjusted to account for an exposure frequency of 350 days per year for a period of 3.56 years (i.e., 0.25 years for the third trimester, 2.0 years for ages 0 to 2 years and 1.31 years for the 2 to 9 year age group).

An evaluation of the potential noncancer effects of DPM exposure was also conducted. Under the point estimate approach, adverse health effects are evaluated by comparing the pollutant concentration with the appropriate Reference Exposure Level. The Reference Exposure Level presented in the Consolidated Table of OEHHA/CARB Approved Risk Assessment Health Values was considered in the assessment.

To quantify noncarcinogenic impacts, the hazard index approach was used. The hazard index assumes that subthreshold exposures adversely affect a specific organ or organ system (i.e., toxicological endpoint). To calculate the hazard index, the pollutant concentration or dose is divided by its toxicity value. Should the total equal or exceed one (i.e., unity), a health hazard is presumed to exist. No exposure frequency or duration adjustments are considered for noncarcinogenic exposures.

The cancer risk at the maximum exposed residential receptor is 0.4 in 1 million, which is below the SCAQMD significance threshold of 10 in 1 million. The highest maximum chronic hazard index at the maximum exposed residential receptor is 0.006, which is below the SCAQMD's threshold of 1.0. Therefore, Project construction is not anticipated to result in an elevated health risk to nearby sensitive receptors and potential impacts would be less than significant.

Conclusion

In conclusion, the Project would not expose sensitive receptors to substantial pollutant concentrations as the Project would not exceed the SCAQMD LST thresholds, would not cause a CO hot spot, and would not create a localized air quality health impact. Therefore, impacts would be less than significant.

Although not significant for the Project, impacts to sensitive receptors would also be slightly reduced under Alternative 3 because operational emissions associated with vehicle trips would be reduced. All other impacts related to air quality under Alternative 3, including consistency with applicable air quality plans, as well as health risk impacts, would be similar to those under the Project and would be less than significant. As with Project, air quality impacts would be less than significant and no mitigation is required.

Finding

The City finds based on substantial evidence that project-level and cumulative air quality impacts (sensitive receptors) would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Facts

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project would not include any of the land uses that have been identified by the SCAQMD as odor sources.

Construction activities associated with the Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon Project completion. In addition, the Project would be required to comply with the California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than 5 minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. The Project would also comply with the SCAQMD Regulation XI, Rule 1113 – Architectural Coating, which would minimize odor impacts from reactive organic gas emissions during architectural coating (SCAQMD 2016a). Any impacts to existing adjacent land uses would be short-term and are less than significant.

Alternative 3 would consist of the same uses as the Project and would not include any of the land uses that have been identified by the SCAQMD as odor sources. Alternative 3 would involve similar construction elements and duration to the Project. As such, construction-related odor impacts under Alternative 3 would be short-term and less than significant, similar the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative air quality impacts (odors) would be less than significant.

3.4.4 Biological Resources

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Facts

Under the existing conditions, the Project site is predominantly developed with paved surfaces and manmade structures. A limited amount of landscape areas are located within the Project site and along the public rights-of-way contain ornamental trees, shrubs, and turf. This vegetation, which was planted in conjunction with the existing residential users and the City, is ornamental in nature, entirely surrounded by urban development, and does not form a cohesive plant community that would provide quality suitable habitat for candidate, sensitive or special-status wildlife species, or would support wildlife movement. Additionally, given these existing on-site conditions, wetlands or other jurisdictional waters are not found within the Project site (USFWS 2021). The Project would involve installation of a pedestrian bridge in the middle of the northern boundary of the Project site. The pedestrian bridge would extend beyond the Project site and cross over the concrete-lined Torrance Lateral Drainage Canal (which drains immediately into the Dominguez Channel, a jurisdictional feature) to connect with the park area that is contemplated as part of the proposed 2021 District at South Bay project. All components of the pedestrian bridge including all features needed to support the bridge, would be located above the 100-year flood zone and outside of the jurisdictional limits of this watercourse, which are clearly defined by the vertical concrete walls of the canal. No construction activities would occur within the canal and no waters or materials would be discharged into the canal. All construction activities would be conducted in accordance with the Project's Stormwater Prevention Pollution Plan to prevent potential pollutants from entering the waterway during construction. An aerial easement from the Los Angeles County Department of Public Works would be obtained to allow for the bridge construction and public use. Given that the bridge would not encroach on the jurisdictional

limits of the waterway, the Project would have no impact on wetlands or other jurisdictional waters. Lastly, any development activities conducted pursuant to the Imperial Avalon Specific Plan would be required to comply with all applicable requirements set forth by the City, including the City's parkway tree preservation and protection regulations. Therefore, impacts associated with biological resources would not occur.

Alternative 3 is located on the same site as the Project and would involve similar uses at a lesser intensity than the Project. Therefore, like the Project, Alternative 3 impacts associated with biological resources would not occur.

Finding

The City finds based on substantial evidence that project-level and cumulative biological resources impacts would not occur.

3.4.5 Cultural Resources

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Facts

As detailed in the Historical Resources Assessment, Cultural Resources Evaluation Letter Report, and as summarized below, there are no historical resources on the Project site and the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

As part of the Cultural Resources Evaluation Letter Report prepared for the Project, a records search of the California Historical Resources Information Center (CHRIS) at the South Coast Coastal Information Center (SCCIC) was completed on September 9, 2019. The CHRIS search included a review of mapped prehistoric, historical, and built-environment resources. In addition, an intensive survey of the Project site was conducted on August 28, 2019. No historical resources were identified within the Project site or immediate vicinity as a result of the CHRIS records search or intensive survey. The site was reclaimed in 1972 using recycled materials to fill and level the site and develop road bases for the Mobile Home Park. Fill dirt was trucked in from excavation sites and large chunks of concrete from highway improvements and similar projects were brought to the site to be crushed into cement gravel to create the road bases. These materials are considered waste products that have been highly processed and do not have any historical significance. Moreover, as part of the Historic Resources Assessment, the Mobile Home Park was recorded and evaluated in consideration of National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) designation criteria and integrity requirements. As a result of the significance evaluation, the Mobile Home Park and its associated buildings were not found eligible under all NRHP and CRHR designation criteria and integrity requirements, as detailed below.

Criteria A/1: That are associated with events that have made a significant contribution to the broad patterns of our history.

Constructed in 1975, the Project site is associated with the latter years of mobile home park development in Southern California. The establishment and early growth of trailer parks and mobile home parks, particularly during the immediate post-World War II period, reflected a regional response to the massive population expansion that shaped Southern California during this time. Changes to the property type during the 1950s and 1960s reflected both practical and cultural influences that led to the near abandonment of the classic trailer and trailer park, and the development of new mobile home designs and new park types with more amenities. In Carson, this historically significant pattern of development from the 1940s through the 1960s resulted in the establishment of 18 of its 21 extant parks (and an unknown number of non-extant parks) between 1944 and 1971. Only three, including the Project site, were established after 1971. By the mid-70s, mobile home parks have evolved well beyond their post-war origins to include much larger properties, more units, and an architecturally heterogeneous mix of modular homes and larger mobile homes. The Project site embodies all of these 1970s characteristics and postdates the period of significance for the historical pattern of development. As the Project site is not associated with events that have made a significant contribution to the broad patterns of state history, it would not be eligible under Criteria A/1.

Criteria B/2: That are associated with the lives of persons significant in our past.

Research did not yield information on significant individuals in direct association with the Project site. Its owner-developer, Sei Dyo, did not live on site, and his association with it does not appear to have extended beyond ownership (along with ownership of multiple other mobile home properties). He and builder Henry C. Soto are addressed under Criteria C/3, herein. The Project site is not associated with the lives of persons significant in our past and would not be eligible under Criteria B/2.

Criteria C/3: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

The Project site is recognizable as a larger-scale 1970s mobile home park with planning features including paved internal roads, signage, a community building, and other public amenities, and individual unit spaces reflecting consistent sizes, orientations, and setbacks. It contains a mix of mobile homes and modular homes dating from the mid-1970s to the 2010s. However, as discussed under Criteria A/1, it represents a property type and pattern of development post-dating the established period of significance ending in 1969. It is larger in size than older examples, and its mix of unit types and sizes reflects later development of designs that devoted more attention to emulating conventional house types. Carson contains at least 18 extant examples of mobile home parks which predate the Project site, most of which better embody the historic property type. One example lies within 0.5 miles of the Mobile Home Park: Bel-Aire Park (21425 South Avalon Boulevard), which was established in 1960 and retains many of its original mobile home units in their original, closely spaced configuration.

The Mobile Home Park's architect, Associated Design Consultants, was not a master practitioner known for influential or innovative work, and the Mobile Home Park's community building does not embody the distinctive characteristics of a historical type, period, or construction method. Neither the community building nor the Mobile Home Park as a whole possesses high artistic values.

The Mobile Home Park owner-developer, Sei Dyo, was a Los Angeles landscape architect who focused primarily on developing mobile home parks in Southern California. He established at least ten during the 1960s and 1970s, including at least eight under his "Imperial" brand. Dyo's Imperial Avalon Mobile Estates (Mobile Home Park) appears to have been the last of his developments, and he retained ownership of it and his other Carson property, Imperial Carson Mobile Estates (1965) into the 1980s. Dyo was a prominent developer who held headquarters in Los Angeles' Little Tokyo and participated in oral histories pertaining to Japanese American incarceration during World War II, but he does not appear to have been particularly widely known, influential, or prolific. Aside from the Imperial name, his properties do not seem to have any distinctive shared characteristics except for Japanese torii-inspired entry signage. Overall, the Mobile Home Park does not appear to be significant for its association with Dyo.

The Mobile Home Park's builder, Henry Soto of ABC Corp., was a San Pedro landscape architect and nursery owner who founded one of the largest landscape contracting firms in California, the Henry C. Soto Corp. He completed hundreds of landscaping projects in Southern California from the mid-1940s to the mid-1980s, including work for prominent properties like Los Angeles Municipal Airport (pre-Los Angeles International Airport), CBS Television City, the Hyperion Outfall, and Santa Monica City College. Soto co-founded and served as the second president of the California Landscape Contractors Association, the first and largest landscaping contractors association in the country, and led several municipal beautification campaigns. He spoke and published widely about landscape design, with a particular focus on introducing tropical species into residential as well as commercial, industrial, and institutional designs. After a palm tree-related near-bankruptcy in the early 1960s, Soto continued work under several other business names including ABC Corp. He pursued several unusual projects in the late 1960s and 1970s that focused on creating new developable land by filling low spots with household trash and discarded construction materials. His work developing the Mobile Home Park reflected this recycling ethic, which does not appear to have been particularly effective or popular. One of his completed sites, in Rolling Hills Estates, produced land which could not support conventional buildings with concrete foundations. Another proposed landfill project in Pacific Palisades was never undertaken. Soto's recycled-fill approach was suited to the development of the Mobile Home Park, since mobile homes and modular homes do not require substantial or subsurface foundations.

Despite his several failed experiments, Soto had a long and prolific period of productivity as a landscape contractor and was regionally influential in the field of landscape design and construction. He appears to have been a master practitioner. However, the Mobile Home Park's size, orientation, and spatial configuration do not reflect innovative or unusual approaches. Its landscaping is minimal, restricted to small areas at the Mobile Home Park entry and around the community building. There are no "greenbelt" areas or street trees along internal roads or near individual units. While tropical and Japanese garden-appropriate plantings are present in some areas, they are not part of a unified design scheme and do not appear to reflect an overarching landscape design approach by Henry Soto, Sei Dyo, or any other individual. Mature trees that likely date to the Mobile Home Park's original development, including those fronting the property's west perimeter along Grace Avenue, are evergreen species rather than the tropical species typical of Soto's designs. Furthermore, most of the landscaped areas appear to have been altered over time. Soto planted

mature olive trees along the Avalon Boulevard side of the Mobile Home Park during construction to obscure the activity; these trees are no longer present. While the Mobile Home Park may be associated with Soto, it is on the latter end of his work and does not exhibit any of his trademark design characteristics.

While the Mobile Home Park is a distinguishable entity, the contributing components lack individual distinction, it is not historically significant due to its relatively late age, its mix of unit types, and its lack of strong association with significant landscape contractor Henry C. Soto. As a result, the Mobile Home Park would not be eligible under Criteria C/3.

Criteria D/4: That have yielded, or may be likely to yield, information important in prehistory or history.

The Mobile Home Park has not and is unlikely to yield any information important in prehistory or history given the disturbed nature of the site, and therefore would not be eligible under NRHP/CRHR Criteria D/4.

In summary, the Mobile Home Park is not considered a resource for the purposes of CEQA. Therefore, impacts associated with historical resources would be less than significant.

Alternative 3 is located on the same site as the Project where no historic resources are located. Thus Alternative 3 impacts associated with historical resources would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to cultural resources (historic resources) would be less than significant.

b. ***Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?***

Facts

No archaeological resources were identified within the Project site or immediate vicinity as a result of the pedestrian survey, the SCCIC records search, additional background research, and the search of the NAHC's Sacred Lands File. The Project site has undergone extensive modification over time, with the entirety of the site's surface having been created by the introduction of fill materials to reclaim the previously unusable land here. In addition, a recent small utility excavation near the entrance to the Mobile Home Park was observed; these soils appear to be made up of fill materials. It is expected that the majority of the soils underlying the Mobile Home Park are of similar constituency. Fill soils underlying the Project site range from 15 to 35 feet in depth and the Project would involve ground disturbance as deep as 45 feet below ground surface. While the Project would disturb native sediments, the entire Project site was historically fully inundated which would have made the site uninhabitable for occupation, making the likelihood to encounter archeological resources very low. As such, it is not anticipated that the Project would affect archeological resources, and impacts are considered less than significant.

Additionally, it should be noted that Mitigation Measure (MM-)TCR-1 would be required to address potential impacts to TCRs, as discussed in further detail below. This mitigation measure would also further reduce

the Project's already less-than-significant potential to result in impacts to archaeological resources in the unlikely event they were present on the Project site.

Alternative 3 includes similar ground disturbance on the same site as the Project, including excavation up to 45 feet below ground surface and into native soils. Excavation at such levels would be required for almost any redevelopment of the site because the existing subsurface of the site is not suitable to support structures as-is and requires excavation and recompaction. As such, impacts related to cultural resources under Alternative 3 would be similar to those under the Project. The Project includes MM-TCR-1 to address potential impacts to tribal cultural resources by way of monitoring during ground disturbing activities, which would also be applicable to Alternative 3. As with the Project, adherence to MM-TCR-1, would further reduce Alternative 3's already less than significant impacts.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to cultural resources (archaeological resources) would be less than significant. Implementation of Mitigation Measure TCR-1 would further reduce the severity of already less-than-significant impacts related to cultural resources (archaeological resources).

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Facts

No prehistoric or historic burials, including those interred outside of dedication cemeteries, were identified within the Project site as a result of the CHRIS records search, NAHC Sacred Lands File search and tribal outreach, or pedestrian survey. Therefore, the likelihood of encountering human remains within the subsurface of any of the properties within the Project site is low. However, if human remains are encountered during grading or construction activity, those discoveries would require handling in accordance with PRC Section 5097.98, which states that in the event that human remains are discovered during construction, construction activity shall be halted, and the area shall be protected until consultation and treatment can occur as prescribed by law. Therefore, with adherence to state law, impacts would be less than significant. Additionally, as discussed in further detail below, MM-TCR-1 would be required to address potential impacts to TCRs and includes a provision to address the potential discovery of human remains and/or associated funerary objects. This mitigation measure would further reduce the Project's already less-than-significant potential to result in impacts to human remains in the unlikely event they were present on the Project site.

Alternative 3 includes similar ground disturbance on the same site as the Project, including excavation up to 45 feet below ground surface and into native soils. Excavation at such levels would be required for almost any redevelopment of the site because the existing subsurface of the site is not suitable to support structures as-is and requires excavation and recompaction. As such, impacts related to disturbance of human remains under Alternative 3 would be similar to those under the Project. The Project includes MM-TCR-1 to address potential impacts to tribal cultural resources by way of monitoring during ground disturbing activities, which would also be applicable to Alternative 3. As with the Project, this mitigation measure would further reduce the Project's

already less-than-significant potential to result in impacts to human remains in the unlikely event they were present on the Project site.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to cultural resources (human remains) would be less than significant.

3.4.6 Energy

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Facts

Implementation of the Project would increase the demand for electricity and natural gas at the Project site and gasoline consumption in the region during construction and operation but not above available supply.

Existing Uses

The existing Project site is currently developed with the Imperial Avalon Mobile Estates mobile home park (Mobile Home Park), which consists of 225 mobile home coaches, a recreational vehicle storage yard, and a common area with a clubhouse, grass field, recreation building, swimming pool, and guest parking spaces. A California Emissions Estimator Model (CalEEMod) was conducted to quantify the existing energy and natural gas use, as well as yearly vehicle miles traveled from the Mobile Home Park. Trip generation rates associated with the existing use were based on the Imperial Avalon Local Transportation Assessment (Transportation Assessment) prepared by Fehr and Peers. According to the Transportation Assessment, the existing Project site generates approximately 1,141 mobile daily trips. The existing energy use was deducted from the proposed Project's energy use.

Proposed Project

The Project's construction and net operational electricity usage would increase Los Angeles County's consumption by 0.0006% and 0.009%, respectively. Natural gas would not be consumed during Project construction activities; however, natural gas consumed during Project operations represents an approximate 0.0030% increase over Los Angeles County's typical annual natural gas consumption. The Project's construction and net operational vehicle fuel consumption would increase Los Angeles County's consumption by 0.1080% and 0.0307%, respectively.

Construction-Related Energy

Project construction would consume energy in two general forms:

(1) The electricity and fuel energy consumed by construction vehicles and equipment

(2) Bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass

It should be noted that construction activities would not consume natural gas.

Construction Electricity Consumption

Construction activities would require temporary electricity consumption. As previously discussed, SCE is the electricity provider for the Project site. In order to quantify construction electricity consumption, the power cost must be determined. Based on the 2017 National Construction Estimator, the typical power cost per 1,000 square feet of building construction per month is estimated to be $2.32 (Pray 2016). The Project proposes to develop the site with 1,527,694 square feet of residential uses and 10,352 square feet of commercial uses over the course of approximately 60 months. As a result, the total power cost of the on-site electricity usage during the construction of the proposed Project is estimated to be approximately $214,096. Furthermore, as of June 1, 2021, SCE's general service rate schedule (GS-1) is approximately $0.11 per kilowatt hour of electricity (SCE 2015). The electricity usage from Project construction related activities is estimated to be approximately 389 megawatt-hours per year of construction. Thus, the Project's construction electricity consumption would represent a temporary increase of approximately 0.0006% in electricity consumption over the current Countywide usage.

Construction Transportation Consumption

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during demolition, grading, paving, building construction, and architectural coatings. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during construction through compliance with California Code of Regulations, Title 13, Section 2449(d)(3) and 2485, which minimizes the idling time of heavy-duty diesel equipment either by shutting it off when not in use or by reducing the time of idling to nor more than 5 minutes. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. The Project's fuel consumption from construction would be approximately 574,270 gallons, which would increase fuel use in the County by 0.1080%. As such, construction would have a nominal effect on the local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities.

Construction Material Consumption

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The Project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest in minimizing the cost of doing business.

It should be noted that energy intensiveness of materials is not addressed because the California Governor's Office of Planning and Research has explained that "a full 'lifecycle' analysis that would account for energy in building materials and consumer products will generally not be required." Such an analysis runs a substantial risk of double counting energy use and associated greenhouse gas (GHG) emissions (OPR 2018).

Construction-Related Energy Conclusion

There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or State. Moreover, the Project would implement PDF-AQ-1, which requires that during Project construction, all internal combustion engines/construction equipment operating on the Project site shall meet EPA-certified Tier 4 Interim/Final emissions standards. Implementation of this PDF would result in the Project being constructed with equipment that is more fuel-efficient than other equipment commonly being operated throughout the region. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. As such, a less-than-significant impact would occur in this regard.

Operational Energy Consumption

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Project net new operations are estimated to consume approximately 1,010,922 gallons of fuel per year, which would increase Los Angeles County's automotive fuel consumption by 0.0307%. The Project would not result in any unusual characteristics that would result in excessive operational fuel consumption associated with vehicular travel. Fuel consumption associated with Project-related vehicle trips would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

The key drivers of transportation-related fuel consumption are job locations/commuting distance and many personal choices on when and where to drive for various purposes. Those factors are outside of the scope of the design of the proposed Project. However, the Project would include on-site electric vehicle charging stations in parking lots in compliance with CALGreen. This would encourage and support the use of electric vehicles by workers and visitors of the proposed Project and thus reduce the petroleum fuel consumption. It should be noted that a reduction in petroleum fuel consumption was not accounted for in the Project operational automotive fuel consumption. This is due to the speculative nature of assuming a quantitative reduction in fuel consumption generated by the electric vehicle charging stations. Therefore, the Project operational automotive fuel consumption is considered conservative.

Therefore, fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Electricity Demand

The California Energy Commission (CEC) developed 2018–2030 forecasts for energy consumption and peak demand in support of the 2017 Integrated Policy Energy Report for each of the major electricity and natural gas planning areas and the State based on the economic and demographic growth projections. CEC forecasts that the statewide annual average growth rates of energy demand between 2016 and 2030 would be 0.99% to 1.59% for electricity (CEC 2018a).[6] The operational energy consumption of the Project would represent approximately 0.0091% increase in electricity consumption over the current Countywide usage. Therefore, the Project's annual electricity usage would be significantly lower than the CEC's energy demand forecasts. The residential and commercial component of the Project would consume electricity during the same time periods as other residential and commercial developments. As a result, the Project would not result in unique or more intensive peak or base period electricity demand.

Natural Gas Demand

Based on the CEC forecasts, the statewide annual average growth rates of energy demand between 2016 and 2030 would be 0.25% to 0.77% for natural gas (CEC 2018a).[7] Operational energy consumption of the Project would represent approximately 0.0030% increase in natural gas consumption over the current Countywide usage. Therefore, the Project's annual natural gas usage would be significantly lower than the CEC's energy demand forecasts. The residential and commercial component of the Project would consume natural gas during the same time periods as other residential and commercial developments. As such, the Project would not result in unique or more intensive peak or base period natural gas demand.

Operational Energy Efficiency

The proposed Project would be required to comply with the 2019 Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including photovoltaic solar panels, appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the 2019 Title 24 standards significantly reduces residential energy usage by 53% compared to the 2016 standards, and nonresidential energy usage by 30% compared to the 2016 standards (CEC 2018b). The Title 24 Building Energy Efficiency Standards are updated every 3 years and become more stringent between each update; therefore, complying with the latest 2019 Title 24 standards would make the proposed Project more energy efficient than existing buildings built under the earlier versions of the Title 24 standards.

Furthermore, the electricity provider, SCE, is subject to California's Renewables Portfolio Standard. The Renewables Portfolio Standard requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 60% of total procurement by 2030 and to 100% of total procurement by 2045. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development projects would not result in the waste of the finite energy resources.

6 Annual average growth rates of electricity demand and natural gas per capita demand are shown in Table 1 and Table 3, respectively.
7 Annual average growth rates of electricity demand and natural gas per capita demand are shown in Table 1 and Table 3, respectively.

Given the foregoing, the Project would not cause wasteful, inefficient, and unnecessary consumption of building energy during Project operation, or preempt future energy development or future energy conservation. A less-than-significant impact would occur.

Renewable Energy Potential

As part of the Project's design process, the Project Applicant considered how the Project could potentially increase its reliance on renewable energy sources to meet the Project's energy demand. Renewable energy sources that were considered for their potential to be used to power the Project, consistent with the CEC's definition of eligible renewables, include biomass, geothermal, solar, wind, and small hydroelectric facilities.

Given the Project's location in an urban area and the nature of the Project (i.e., a residential and commercial project on approximately 27.31 acres), there are considerable site constraints including limited land availability, incompatibility with onsite and surrounding land uses for large scale power generation facilities, unknown interconnection feasibility, compatibility with utility provider systems, and no known water or geothermal resources to harness, that would eliminate the potential for biomass, geothermal, and hydroelectric renewable energy to be installed onsite.

Regarding wind power, first, due to the urban nature of the site and surrounding land uses, wind turbines are generally not feasible as it represents an incompatible use. Specifically, a general rule of thumb is to install a wind turbine on a tower with the bottom of the rotor blades at least 30 feet above anything within a 500-foot horizontal radius and to be sited upwind of buildings and trees (APA 2011, NREL 2015), which the Project site cannot accommodate. Secondly, ideal places for wind turbines are where the annual average wind speed is at least 9 miles per hour for small wind turbines and 13 miles per hour for utility-scale turbines (EIA 2022), while the yearly average windspeed at the Los Angeles International Airport is 6.9 miles per hour, which is determined to be the most available representative data set for the Project site (Weatherspark 2022). As such, wind power was not determined to be feasible for the Project.

Regarding solar power, building roofs would be solar ready to facilitate the future installation of solar panels. While the Project does not propose battery storage at the time, the Project does not preclude installation of battery storage in the future if determined to be a feasible and compatible land use of the site.

Operational Energy Consumption Conclusion

Operational energy consumption would represent an approximate 0.0091% increase in electricity consumption and a 0.0030% increase in natural gas consumption over the current Countywide usage. The Project would adhere to all Federal, State, and local requirements for energy efficiency, including the Title 24 standards. Additionally, the Project would not result in a substantial increase in demand for transmission service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure. The Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Additionally, due diligence was undertaken as part of the Project's design process to evaluate how the Project could potentially increase its reliance on renewable energy sources to

meet the Project's energy demand. Based on the foregoing, a less-than-significant impact would occur in this regard.

Although impacts related to energy use were determined to be less than significant for the Project, Alternative 3 would include fewer residential units and lower residential square footage than the Project. As such, transportation energy demand, electricity demand, and natural gas demand would all be reduced under Alternative 3 due to the fact that Alternative 3 would result in 160 fewer daily trips than the proposed Project 98 fewer residential units than the proposed Project. As such, Alternative 3 would use less energy during operation than the Project. All other impacts related to energy under Alternative 3 would likely be similar to or less than those under the Project and would be less than significant. Like the Project, no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to energy consumption would be less than significant.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Facts

The Project would comply with all applicable goals and measures identified in the City's Energy Efficiency Climate Action Plan (EECAP). The EECAP contains energy efficient goals and measures that would help implement energy efficient measures and would subsequently reduce GHG emissions within the City. Furthermore, the Project's consistency with the City's Climate Action Plan (CAP) measures would help reduce energy usage. The Project would comply with all applicable City goal's for reducing energy usage and implementing energy efficiency. Specifically, compliance with Title 24 and CALGreen standards would ensure the Project incorporates energy efficient windows, insulation, lighting, ventilation systems, as well as water efficient fixtures and electric vehicle charging infrastructure. Further, the Project's compliance with Title 24 standards would ensure solar photovoltaic systems are installed for new residential development. Adherence to the Title 24 energy requirements will ensure conformance with the State's goal of promoting energy and lighting efficiency, and the City's EECAP and CAP. Therefore, the proposed Project would result in less than significant impacts associated with renewable energy or energy efficiency plans.

Alternative 3 would be subject to and comply with the same energy-reducing regulations as the Project. Thus, Alternative 3 would result in less-than-significant impacts, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to energy (consistency with applicable plans and policies) would be less than significant.

3.4.7 Geology and Soils

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Facts

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The closest such zone is located along the Newport-Inglewood Fault Zone, approximately 1.8 miles to the east of the Project site. In addition, no known faults traverse the Project site. Furthermore, development of the proposed Project would not directly or indirectly cause or exacerbate existing fault rupture risks. As a result, no impacts related to surface rupture of a known earthquake fault would occur.

Alternative 3 is located on the same site as the Project. Thus, Alternative 3 would not result in significant impacts related to surface rupture of a known earthquake fault would occur, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to geology and soils (fault rupture) would not occur.

ii) Strong seismic ground shaking?

Facts

The Project site is located in the seismically active region of Southern California. The Holocene-active Newport-Inglewood Fault Zone is located relatively close (1.8 miles to the east) to the Project site. This fault, as well as numerous other regional faults (e.g., San Andreas, Palos Verde, Elysian Park Faults), are capable of producing moderate to large seismic events (i.e., earthquakes) that could adversely affect the Project site, if not constructed appropriately. However, proposed Project construction would be completed in accordance with current California Building Code (CBC) requirements which include seismic design criteria. The CBC provides procedures for earthquake-resistant structural design that includes considerations for on-site soil conditions, occupancy, and the configuration of the structure, including the structural system and height. Although substantial damage to structures may be unavoidable during large earthquakes, the proposed structures would be designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage, and loss of life.

Chapters 18 and 18A of the CBC include (but are not limited to) the requirements for foundation and soil investigations (Sections 1803 and 1803A); excavation, grading, and fill (Sections 1804 and 1804A); damp-proofing and water-proofing (Sections 1805 and 1805A); allowable load-bearing values of soils (Sections 1806 and 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Sections 1807 and 1807A), and foundations (Sections 1808 and 1808A); and design of shallow

foundations (Sections 1809 and 1809A) and deep foundations (Sections 1810 and 1810A). In conjunction with City policies aimed at mitigating and minimizing geologic hazards, the proposed Project would not directly or indirectly cause substantial adverse effects involving strong seismic ground shaking. Impacts would be less than significant.

Alternative 3 involves similar construction on the same site as the Project. As with the Project, Alternative 3 would be designed and constructed in accordance with the requirements of the California Building Code. As such, Alternative 3's impacts related to geology and soils would be similar to the Project. Thus, Alternative 3 would not directly or indirectly cause substantial adverse effects involving strong seismic ground shaking. Impacts would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to geology and soils (ground shaking) would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Facts

According to mapping compiled by the CGS, the Project site is located in a seismic hazard zone for liquefaction. The preliminary geotechnical investigation confirmed that the Project site is underlain by soils that could be susceptible to liquefaction during a seismic event. Hazards associated with soil liquefaction and seismic-related ground failure include temporary loss of soil bearing capacity, lateral spreading, differential compaction, and slope instability. Liquefaction of on-site soils may settle on an order of over 2 inches due to ground shaking.

However, all proposed development within the Project site would be required to adhere to requirements of the CBC and Special Publication 117A for the mitigation of liquefaction hazards. As part of adherence to these building code requirements, Project designs would require geotechnical engineering measures such as site preparation (e.g., treatment of liquefiable layers or use of engineered fills) and foundation design that would minimize damage from the effects of liquefaction at the Project site. In addition, development of the Project site would not increase or exacerbate the potential for liquefaction to occur and therefore would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismically related ground failure, including liquefaction. Impacts would be less than significant.

Alternative 3 involves similar construction on the same site as the Project. As with the Project, Alternative 3 would be designed and constructed in accordance with the requirements of the California Building Code. As such, Alternative 3's impacts related to geology and soils would be similar to the Project. Thus, Alternative 3 would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismically related ground failure, including liquefaction. Impacts would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to geology and soils (liquefaction) would be less than significant.

iv) Landslides?

Facts

The Project site is relatively level and not located near any exposed hillsides with little to no exposure to potential landslides or slope instabilities. Based on these factors and the relatively flat topography, the site-specific geotechnical report determined that landslides do not pose a significant hazard to the proposed Project. Regardless, grading and construction would be completed in compliance with CBC regulations and compliance with City ordinances related to grading, thus also reducing the potential for any slope instability to occur. Finally, the Project site would not exacerbate the potential for on- or off-site landslides. As such, implementation of the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts are considered less than significant.

Alternative 3 involves similar construction on the same site as the Project. As with the Project, Alternative 3 would be designed and constructed in accordance with the requirements of the California Building Code and City ordinances. As such, Alternative 3's impacts related to geology and soils would be similar to the Project. Thus, Alternative 3 would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to geology and soils (landslides) would be less than significant.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Facts

Construction

Project construction would entail demolition of existing improvements, grading of the entire Project site, followed by construction of the proposed structures. These construction activities would include earthwork activities that could expose soils to the effects of wind and water erosion, if not conducted appropriately. However, existing State and federal National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements include the preparation and implementation of a stormwater pollution prevention plan (SWPPP) for projects with ground disturbance in excess of 1 acre. In compliance with Construction General Permit requirements, the SWPPP would establish erosion and sediment control best management practices (BMPs) for all applicable construction activities. Typical examples of erosion-related construction BMPs include the following:

- Silt fences and/or fiber rolls installed along with the limits of work and/or the Project construction site
- Stockpile containment and exposed soil stabilization structures (e.g., Visqueen plastic sheeting, fiber rolls, gravel bags and/or hydroseed)
- Runoff control devices (e.g., fiber rolls, gravel bag barriers/chevrons, etc.) used during construction phases conducted during the rainy season
- Wind erosion (dust) controls
- Tracking controls at the site entrance, including regular street sweeping and tire washes for equipment
- Regular inspections and maintenance of BMPs

These BMPs would be refined and/or added to as necessary by a qualified SWPPP professional to meet the performance standards required by the Construction General Permit.

In addition, development activities would comply with City grading and erosion control standards to minimize soil erosion. Compliance with the Construction General Permit and City grading requirements would ensure that soil erosion or loss of topsoil impacts during construction would be minimized. As such, impacts would be less than significant.

Operations

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project site would be covered by the proposed structures, impervious surfaces (e.g., walkways and roadways), while the remaining portions of the site would be covered with irrigated landscaping. All proposed improvements would also be required to adhere to drainage control requirements such that there would be negligible exposed areas that could be susceptible to erosion. In addition, the majority of the area surrounding the Project site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. With the implementation of applicable post-construction BMPs and drainage control requirements, impacts related to erosion or loss of topsoil during Project operation would be less than significant.

Alternative 3 involves similar construction on the same site as the Project. As with the Project, Alternative 3 would comply with Construction General Permit and City grading requirements. As such, Alternative 3's impacts related to geology and soils would be similar to the Project. Thus, Alternative 3 would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to geology and soils (erosion) would be less than significant.

c. ***Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

Facts

As previously described for significance threshold 1(c) and 1(d), the Project site would not increase the potential for landslide, liquefaction, and lateral spreading to occur. All proposed improvements would be required to adhere to the CBC and City building code requirements which would address these geotechnical hazards, if present. Therefore, potential impacts associated with these hazards would be less than significant.

Subsidence

With respect to subsidence, portions of the City have historically been prone to subsidence owing to some combination of oil and groundwater withdrawal as well as tectonic activity. However, Project construction and operation would not exacerbate the potential for subsidence to occur. Although groundwater dewatering may be required during construction, the relative amount of groundwater extracted would be minimal and temporary, such that there would negligible effects related to subsidence. Therefore, potential impacts associated with subsidence would be less than significant.

Collapsible Soils

Regarding collapsible soils, artificial fill and young alluvial fan sediments underlie the Project site. The undocumented artificial fill consists of a mixture of clay, silt, and sand, which was observed to be stiff to medium dense. The fill material is then underlain by alluvial deposits consisting of interlayered mixtures of sandy to silty clay, clayey to sandy silt, clayey sand, and sands. These alluvial deposits were reportedly stiff, medium dense to dense, and fine grained, with occasional gravel and cobbles. Proposed grading would consist of over-excavation of loose, unconsolidated materials until such a depth that competent material is encountered. The excavated area would then typically be backfilled with compacted soil until the finished grade is achieved.

In addition, structures to be built under the Project would be constructed in compliance with CBC requirements, including allowable load-bearing values of soils (Sections 1806 and 1806A); the design of embedded posts and poles (Sections 1807 and 1807A), and foundations (Sections 1808 and 1808A); and design of deep foundations (Sections 1810 and 1810A), as applicable, which are designed to assure safe construction requirements appropriate to site conditions. Therefore, based on existing site conditions and adherence to building code requirements, potential impacts associated with collapsible soils would be less than significant.

Alternative 3 involves similar construction on the same site as the Project. As with the Project, Alternative 3 would be designed and constructed in accordance with the requirements of the California Building Code and City ordinances. As such, Alternative 3's impacts related to geology and soils would be similar to the Project. Thus, Alternative 3 impacts associated with unstable soils would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to geology and soils (soil instability) would be less than significant.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Facts

Expansive soils are clay-rich soils that shrink when dry and swell when wet. This change in volume can exert substantial pressure on foundations, resulting in structural distress and/or damage. Limited laboratory testing of on-site soils indicate that surficial soils are considered moderate to highly expansive. However, Project construction would be completed in compliance with the CBC and City building codes, which include requirements to address expansive soil hazards. Typical measures described in Chapter 18 of the CBC to alleviate expansive soils include the following:

- Excavation of expansive soils until such a depth that competent material is encountered
- Installation of foundations designed to resist forces exerted on the foundation due by expansive soils
- Stabilization of the soils by chemical, dewatering, pre-saturation, or equivalent techniques

Project construction would not increase or exacerbate the potential for expansive soils to create substantial direct or indirect risk of the property. As such, impacts associated with expansive soils would be less than significant.

Alternative 3 involves similar construction on the same site as the Project. As with the Project, Alternative 3 would be designed and constructed in accordance with the requirements of the California Building Code and City ordinances. As such, Alternative 3's impacts related to geology and soils would be similar to the Project. Thus, Alternative 3 impacts associated with expansive soils would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to geology and soils (expansive soil) would be less than significant.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Facts

The Project site is currently served by sewer infrastructure, and any new development would require sewer connections. The Project site area is located in an urbanized area that is currently connected to sewer lines. No septic tanks or alternative wastewater disposal is proposed; therefore, implementation of the Project would result no impact.

Like the Project, Alternative 3 would not involve septic tanks or alternative wastewater disposal. Therefore, no impact would result.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to geology and soils (waste water disposal) would not occur.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Facts

The institutional records search and the desktop geological and paleontological review did not reveal any fossil localities within the Project site, and the Project site is not anticipated to be underlain by unique geologic features. The Project site is underlain by variable thicknesses of artificial fill, Holocene alluvium, and Pleistocene alluvium, and lagoonal deposits. The artificial fill, which ranges from 7 to 35 feet bgs according to geotechnical borings, has no paleontological sensitivity. Holocene alluvium, which is likely present immediately below the fill in areas where no caliche or shell fragments were recovered during exploratory geotechnical borings, has low paleontological sensitivity on the surface, but increases with depth. Pleistocene alluvium and lagoonal deposits, which are likely below the fill areas in which caliche and/or shell fragments were recovered during exploratory geotechnical borings, have high paleontological sensitivity. Given the paleontological sensitivity of deeper Holocene alluvium and Pleistocene alluvium/lagoonal deposits; the presence of shells, caliche and possible diatomaceous earth found within the geotechnical borings for the Project; and the nearby Pleistocene fossil mammal localities reported by the Natural History Museum of Los Angeles County, intact paleontological resources may be present below artificial fill and the Holocene alluvial sediments where older, Pleistocene, sediments are anticipated and in areas immediately underlain by Pleistocene alluvium or lagoonal deposits. If intact paleontological resources are located on site, ground-disturbing activities associated with construction of the Project, such as grading and excavation during site preparation, has the potential to destroy a unique paleontological resource, if present on-site. As such, the Project site is considered to be potentially sensitive for paleontological resources and without mitigation, the potential damage to paleontological resources during construction associated with the Project is considered a potentially significant impact. As such, implementation of MM-PALEO-1**,** which stipulates the preparation of a Paleontological Resources Impact Mitigation Program, is required to help ensure that, in the event of an unanticipated find of a significant paleontological resource, such as identifiable invertebrate and vertebrate fossils, the resource is protected, researched, and potentially preserved (if subsequently deemed warranted) to maintain integrity and significance. The Paleontological Resources Impact Mitigation Program will guide a monitoring program that will be executed by a qualified paleontologist and will contain information regarding preconstruction meeting attendance, worker environmental awareness training, procedures for adequate monitoring, salvaging of fossils and associated critical data, and curation with an accredited paleontological repository with retrievable storage. With implementation of MM-PALEO-1, Project impacts are considered less than significant with mitigation incorporated.

Alternative 3 includes similar ground disturbance on the same site as the Project, including excavation up to 45 feet below ground surface and into native soils. Excavation at such levels would be required for almost any redevelopment of the site because the existing subsurface of the site is not suitable to support structures as-is and requires excavation and recompaction. As such, impacts related to cultural

resources under Alternative 3 would be similar to those under the Project. MM-PALEO-1 would be applicable to Alternative 3 to reduce potential impacts to paleontological resources. With application of MM-PALEO-1, impacts with regard to geology and soils for Alternative 3 would be less than significant. No additional mitigation would be required.

Finding

In accordance with CEQA Guidelines Section 15091(a)(1) and Public Resources Code 21081(a)(1), the City finds that with implementation of Mitigation Measure PALEO-1 changes or alterations have been required in, or incorporated into, the project would avoid or substantially lessen the significant environmental effect with regard to geology and soils (paleontological resources) as identified in the Final EIR. Thus, after implementation of Mitigation Measure PALEO-1, impacts to geology and soils (paleontological resources) would be less than significant.

3.4.8 Greenhouse Gas Emissions

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Facts

Project-Related Sources of Greenhouse Gas Emissions

Project-related GHG emissions include emissions from construction activities that are summed and amortized over the lifetime of the Project (assumed to be 30 years), then added to the operational emissions (SCAQMD 2009). Project operational emissions would result from area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Mobile emissions are based on the Imperial Avalon Project Local Transportation Assessment (Transportation Assessment) prepared by Fehr and Peers provided by the Imperial Avalon LLC (Project Applicant) on March 26, 2021. California Emissions Estimator Model Version 2016.3.2 (CalEEMod) relies upon trip data within the Project's Transportation Assessment and Project specific land use data to calculate emissions. Vehicle emission factors were taken from CARB's 2017 Emission Factor (EMFAC2017) model and incorporated into CalEEMod.

Existing Greenhouse Gas Emissions

The existing Project site is currently developed with the Imperial Avalon Mobile Estates mobile home park (Mobile Home Park), which consists of 225 mobile home coaches, a recreational vehicle storage yard, and a common area with a clubhouse, grass field, recreation building, swimming pool, and guest parking spaces. A CalEEMod model run was conducted to quantify the existing GHG emissions from the Mobile Home Park. Trip generation rates associated with the existing use were based on the

Transportation Assessment. According to the Transportation Assessment, the existing Project site generates approximately 1,141 mobile daily trips.

Project Greenhouse Gas Emissions

The proposed Project would construct a mixed-use development consisting of approximately 10,352 square feet of café/restaurant space and 1,213 residential units, as well as residential amenities and open space areas. The net operation emissions were calculated by subtracting the existing use emissions from the proposed Project emissions. Project GHG emissions were calculated using CalEEMod and an EMFAC2017 for the Project's 2027 opening year. The proposed Project would include GHG emission reductions from the most current building energy efficiency standards, the 2019 Title 24 building code and 2019 CALGreen. Compliance with Title 24 and CALGreen standards would ensure the Project incorporates photovoltaic solar panels, energy efficient windows, insulation, lighting, ventilation systems, as well as water efficient fixtures and electric vehicles charging infrastructure.

The total amount of Project related operational GHG emissions from direct and indirect sources combined, minus the existing use GHG emissions, would be approximately 9,214.53 metric tons of CO_2e per year.

Greenhouse Gas Plan Consistency

The following discussion analyzes the Project's consistency with the City's Climate Action Plan (CAP), 2020–2045 RTP/SCS, and 2017 Scoping Plan. As previously noted, the CAP is not a qualified GHG reduction plan under CEQA that the proposed Project would be able to tier from and the City has not yet adopted a such plan. Therefore, the Project's consistency with the CAP has been included for informational purposes only.

City of Carson Climate Action Plan

In 2017, the City, in cooperation with the South Bay Cities Council of Governments, developed an unqualified CAP. The CAP serves as a guide for action by setting GHG emission reductions goals and establishes strategies and policy to achieve outcomes over the next 20 years.

2017 Scoping Plan

The 2017 Scoping Plan identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the Scoping Plan (2013). Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions would be adopted as required to achieve statewide GHG emissions targets.

2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Regional Council of SCAG formally adopted the 2020–2045 RTP/SCS. The 2020–2045 RTP/SCS includes performance goals that were adopted to help focus future investments on the best-performing projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. The SCAG 2020–2045 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 8% below

2005 levels by 2020 and 19% by 2035 in accordance with the most recent CARB targets adopted in March 2018. Five key SCS strategies are included in the 2020–2045 RTP/SCS to help the region meet its regional vehicle miles traveled and GHG reduction goals, as required by the State. The proposed Project would be consistent with the GHG emission reduction strategies contained in the 2020–2045 RTP/SCS.

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the CAP, 2017 Scoping Plan, and 2020–2045 RTP/SCS. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions, as described, would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

Alternative 3 would have slightly reduced air emissions during operation compared to the Project due to the reduction in daily trips (160 fewer than the Project) and the number of residential units (98 fewer than the Project). Accordingly, although not significant for the Project, Alternative 3 would also result in a reduction in GHG emissions compared to the Project. The Project was determined to be consistent with applicable GHG plans, policies, and regulations. Because Alternative 3 would have lower GHG emissions than the Project, it would also be consistent with such plans, policies, and regulations. Like the Project, no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to GHG emissions would be less than significant.

3.4.9 Hazards and Hazardous Materials

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Facts

Construction

Project-related construction activities would include demolition and removal of existing structures on the Project site and use of hazardous materials during construction of new buildings, structures, and other features of the proposed Project. The potential for exposure of the public or the environment to hazardous materials during these construction activities is addressed in the following discussion.

Exposure to Hazards in Existing Structures

The proposed Project would include demolition of existing structures of varying ages, some of which were built prior to 1978 and, as a result, could contain hazardous building materials. Exposure to hazardous building materials during demolition, including asbestos-containing materials (ACMs), lead based paint (LBP), or polychlorinated biphenyls (PCBs), mercury and other hazardous materials in structures would only occur during demolition activities, but could result in adverse health effects if not managed appropriately as required by existing laws and regulations. Once the structures have been removed, there would be no further exposure during operation of the proposed Project.

Existing federal, State, and local regulations require demolition or renovation activities that may disturb or require the removal of materials that consist of, contain, or are coated with ACM, LBP, PCBs, mercury, and other hazardous materials to be inspected and/or tested for the presence of hazardous materials. Further, all hazardous materials must be managed and disposed of in accordance with laws and regulations described in the Regulatory Setting by licensed contractors.

The identification, removal, and disposal of ACM is regulated under 8 CCR 1529 and 5208. The identification, removal, and disposal of LBP is regulated under 8 CCR 1532.1. For both ACM and LBP, all work must be conducted by a State-certified professional. If ACM and/or LBP is determined to exist on site, a site-specific hazard control plan must be prepared and submitted to the appropriate agency detailing removal methods and specific instructions for providing protective clothing and equipment for abatement personnel (SCAQMD for asbestos and California OSHA for lead). If necessary, a state-certified LBP and an asbestos removal contractor would be retained to conduct the appropriate abatement measures as required by the plan. Wastes from abatement and demolition activities would be disposed of at a landfill(s) licensed to accept such waste. Once all abatement measures have been implemented, the contractor would conduct a clearance examination and provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

In the case of PCBs, the identification, removal, and disposal is regulated by the EPA under the Toxic Substances Control Act (Title 40 Chapter 1 Subchapter R Part 761) and California regulations (22 CCR 66263.44). Electrical transformers and older fluorescent light ballasts not previously tested and verified to not contain PCBs must be tested. If PCBs are detected above action levels, the materials must be disposed of at a licensed facility permitted to accept the materials. Upon completion of abatement measures, if applicable, the contractor would provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

In the case of mercury in fluorescent light tubes and switches, the identification, removal, and disposal is regulated under 22 CCR 67426.1–67428.1 and 66261.50. Under these regulations, the light tubes must be removed without breakage and disposed of at a licensed facility permitted to accept the materials. Upon completion of abatement measures, if applicable, the contractor would provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

The proposed Project would involve demolition and removal of structures of varying ages which could potentially contain hazardous building materials. However, pursuant to federal, state, and local regulations,

the demolition permit process would require appropriate surveying, identification and disposal of any identified hazardous building materials by licensed contractors. Therefore, exposure to asbestos containing materials, LBP and/or other hazardous building materials that would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant.

Use of Hazardous Materials During Construction

Construction activities would also likely require the use of limited quantities of hazardous materials such as fuels, oils, and lubricants for construction equipment; paints and thinners; and solvents and cleaners. These hazardous materials are typically packaged in consumer quantities and used in accordance with manufacturer recommendations and would be transported to and from the Project site. The improper handling and transport of hazardous materials could result in adverse health effects to workers or the public.

Transportation of hazardous materials is regulated by the U.S. Department of Transportation and California Department of Transportation (Caltrans). Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the exposure of hazardous materials. In addition, businesses that use hazardous materials, including construction companies, are required to prepare and implement HMBPs describing procedures for the handling, transportation, generation, and disposal of hazardous materials. As the Certified Unified Program Agency, Health Hazardous Materials Division (HHMD) would be responsible for ensuring compliance with these regulations including, but not limited to, the Hazardous Waste Control Act, the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program, and the Aboveground Storage Tank Program.

A comprehensive set of federal, state, and local laws and regulations regulate the transportation, management, and disposal of hazardous materials and wastes so as to reduce the potential risks of human exposure. For these reasons, the potential for construction of the proposed Project to result in a significant hazard due to exposure of the public or the environment to hazardous materials or wastes to through the routine transport, use, or disposal of hazardous materials would be a less-than-significant impact.

Operation

The use of common hazardous materials would occur as part of the operation of the proposed Project, primarily associated with maintenance activities. Hazardous chemicals common in other relatively similar residential and commercial land uses include paints, lubricants, solvents, cleaning supplies, and relatively small quantities of fuels, oils, and other petroleum-based products. Activities such as landscaping, can also become sources of releases of hazardous materials with pesticides and herbicides.

The hazardous materials that would be associated with the proposed Project are typically handled and transported in small quantities, and because the health effects associated with them are generally not as serious as industrial uses, operation of a majority of the new uses at the site would not cause an adverse effect on the environment with respect to the routine transport, use, or disposal of general office and household hazardous materials. The existing regulatory framework requires appropriate training of

employees in the use, storage, and disposal of any hazardous materials and wastes. As required by the HHMD, any business that would store hazardous materials and/or waste at its site would be required to submit business information and hazardous materials inventory forms contained in Hazardous Materials Management Plan and Hazardous Materials Business Plan. In addition, all hazardous materials handlers are subject to inspection every 3 years. The HHMD, as the Certified Unified Program Agency, requires all new commercial and other users to follow applicable regulations and guidelines regarding storage and handling of hazardous waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state and federal regulations including the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 22. With adherence to existing regulatory requirements, the impact of the routine transport, use or disposal of hazardous materials associated with proposed uses at the site would be a less-than-significant impact.

Alternative 3 would include similar construction and operation characteristics when compared to the Project. As such, similar hazardous materials would be handled, transported, and disposed of during both construction and operation. As with the Project, these impacts would remain less than significant through adherence to applicable regulations. Alternative 3 would adhere to PDF-HAZ-1 during ground-disturbing activities, which would involve the preparation and implementation of a soil management plan to inspect and properly handle soils that may contain trace amounts of contaminated materials. As Alternative 3 is located on the same site as the Project, hazards and hazardous materials impacts related to the physical location and attributes of the site would remain the same under Alternative 3. Impacts would be less than significant, and no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hazards and hazardous materials (routine transport, use, or disposal) would be less than significant.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Facts

Construction

As previously noted, construction activities would require the use of limited quantities of hazardous materials that are normal requirements of the construction process, including fuels, oils, and lubricants for construction equipment; paints and thinners; and solvents and cleaners. These materials would be transported to and from the Project site for use during construction activities. The improper handling and transport of hazardous materials could result in accidental release of hazardous materials, thereby exposing the public or the environment to hazardous materials.

The transport of hazardous materials is regulated by the U.S. Department of Transportation and Caltrans. The transport regulations ensure safe transport of the regulated materials by addressing how hazardous materials are labeled, identifying approved transport routes, and include provisions that restrict containment during highway transportation of hazardous materials and wastes.

Construction activities would disturb more than one acre and, thus, would be required to implement requirements of the National Pollutant Discharge Elimination System General Construction Permit. This permit requires implementation of BMPs that would include measures to address the safe handling of hazardous materials, and in the unlikely event of an inadvertent release, also requires spill response measures to contain any release of hazardous materials. The use of construction BMPs implemented as part of a Stormwater Pollution Prevention Plan (discussed further in Section 3.5.10, as required by the National Pollutant Discharge Elimination System General Construction Permit, would minimize the potential adverse effects from accidental release of hazardous materials or wastes.

In general, aside from refueling needs for heavy equipment, the hazardous materials typically used on a construction site would be brought onto the site by the construction contractor, packaged in consumer quantities, and used in accordance with manufacturer recommendations. The overall quantities of these materials on the site at any one time would not result in large bulk amounts that, if spilled, could cause significant soil or groundwater contamination. If a spill of hazardous materials on the construction sites were to occur, the spilled materials would be localized because of the relatively small quantities involved and would be cleaned up in a timely manner in accordance with identified BMPs.

As previously described, refueling activities of heavy equipment would be conducted in a dedicated and controlled area with secondary containment and protective barriers to minimize any potential hazards that might occur with an inadvertent release. Given the required protective measures (i.e., BMPs) and the quantities of hazardous materials typically needed for construction projects, such as the proposed Project, the threat of exposure to the public or contamination to soil and/or groundwater from construction-related hazardous materials is considered a less-than-significant impact.

Operation

Operation of the proposed Project would involve the use of relatively small quantities of common hazardous materials, including paints and thinners, cleaning solvents, and fuels, oils, and lubricants that are commonly associated with the residential and commercial land uses. These materials would be typically packaged in consumer quantities, as compared to bulk deliveries for industrial land uses, and used in accordance with manufacturer recommendations.

Pursuant to the provisions of programs administered by the Los Angeles County HHMD, storage of all hazardous materials on site would be required to adhere to a site-specific hazardous materials business plan (HMBP). The preparation and implementation of a HMBP would be required for the site and would identify safe measures to store, handle, and dispose of hazardous materials such that accident and upset conditions are minimized. The HMBP would also include spill response measures to ensure that in the unlikely event that a release does occur, protocols would be implemented to contain and control any accidental release in a manner that is protective of human health and the environment. Such protocols could include employee training, the location of absorbent materials to contain a release, and notification requirements to ensure that human health and the environment is protected from any exposure. The adequacy of and compliance with the HMBP would be overseen and enforced by the HHMD. Because a comprehensive set of enforced laws and regulations govern the transportation and management of hazardous materials to reduce the potential hazards to the public and environment, this impact would be less than significant.

Alternative 3 would include similar construction and operation characteristics when compared to the Project. As such, similar hazardous materials would be handled, transported, and disposed of during both construction and operation. As with the Project, these impacts would remain less than significant through adherence to applicable regulations. Alternative 3 would adhere to PDF-HAZ-1 during ground-disturbing activities, which would involve the preparation and implementation of a soil management plan to inspect and properly handle soils that may contain trace amounts of contaminated materials. As Alternative 3 is located on the same site as the Project, hazards and hazardous materials impacts related to the physical location and attributes of the site would remain the same under Alternative 3. Impacts would be less than significant, and no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hazards and hazardous materials (upset and accident conditions) would be less than significant.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Facts

There are no schools located within a one-quarter mile of the Project site. The Double Love WeeCare daycare center is located approximately 1,365 (0.26 miles) from the site; however, based on the proposed land uses, development of the proposed Project would not include any substantive hazardous emissions that would be likely to adversely affect this daycare center even if considered within the one-quarter mile limit. Therefore, no impacts associated with emitting hazardous emissions or handling hazardous or acutely hazardous materials within 0.25 miles of a school would occur.

Alternative 3 is located on the same site as the Project and involves the same uses. Therefore, like the Project, Alternative 3 would result in no impacts associated with emitting hazardous emissions or handling hazardous or acutely hazardous materials within 0.25 miles of a school.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hazards and hazardous materials (schools) would be less than significant.

d. Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Facts

The Phase I and II report determined that the Project site itself was not identified in any of the environmental databases reviewed. However, due to the proximity of the site to the former landfill (Cal Compact Landfill) and history of industrial uses in the area, a Phase II investigation was recommended and completed.

While there are no known releases within the Project site, any legacy contaminants present in subsurface materials could adversely affect future occupants, visitors or workers through contact with contaminated soils during excavation or other ground disturbing activities. The proposed grading would seek to reuse all excavated materials on site with no off-site disposal. In addition to the potential for legacy contaminants in the soil, there is a potential hazard of exposure to hazardous materials through future vapor intrusion into proposed Project structures. As noted previously, however, the Project site is located within 1,000 feet of the former Cal Compact Landfill and would require compliance with Section 110.3 of the Los Angeles County Building Code to protect structures from any landfill gas intrusion. Typically, the protection comes in the form of installing a vapor barrier beneath the structure foundation that prevents any vapor intrusion from adversely affecting occupants. To address the potential for any methane gas intrusion, a conventional methane mitigation system would be installed beneath all proposed buildings at the Project site as part of the proposed Project. As discussed in Section 2, Project Description, the systems will likely consist of passive sub-slab venting, spray applied barriers and installation of vertical vent risers along the sides or through the newly constructed buildings. The methane mitigation system would also serve as an effective means of preventing vapor intrusion of VOCs or other hazardous gas compounds, if present.

AEC collected 2 soil samples from different depths in 12 borings at the Project site to assess the potential presence of legacy contaminants across the site. In addition, a total of 23 soil gas samples were collected at the site. All soil and soil gas samples were analyzed by a certified analytical laboratory and the results were compared to regulatory screening levels for residential land uses. The results of the analytical testing revealed various contaminants of concern in the soil that were above residential screening levels. TPH was detected in soil samples that were considered to be at “nuisance condition” levels and not at levels that would be considered a substantive threat to human health or the environment (i.e., not at levels above regulatory screening levels). TPH will also biodegrade naturally over time and with the proposed grading could end up being diluted with the reworking of the soils. Additionally, with implementation of PDF-HAZ-1, Project construction would require implementation of a soil management plan that provides sufficient protocols to address any discovered soils that show evidence of contamination (i.e., odor or discoloration) in a manner that is protective of construction workers and the public. In addition, Project construction would be required to implement Section 110.3 of the Los Angeles County Building Code to protect future occupants from any vapor intrusion hazards. Therefore, with adherence to existing regulatory requirements including Section 110.3 of the Building Code and installation of a conventional methane mitigation system, the potential impact from any legacy contaminants would be considered less than significant.

Alternative 3 is located on the same site as the Project and involves the same uses. Therefore, like the Project, with adherence to existing regulatory requirements including Section 110.3 of the Building Code and installation of a conventional methane mitigation system, Alternative 3’s potential impact from any legacy contaminants associated with the Project site’s proximity to the former landfill (Cal Compact Landfill) and history of industrial uses in the area would be considered less than significant.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hazards and hazardous materials (site remediation) would be less than significant.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Facts

The Project site is not located within 2 miles of a public airport, and as a result, is not included as part of a land use plan associated with an airport. Therefore, no impacts would occur. Alternative 3 is located on the same site as the Project, and thus no impacts would occur.

Finding

The City finds based on substantial evidence that project-level and cumulative hazard and hazardous materials impacts (airports) would not occur.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Facts

In accordance with the Disaster Mitigation Act of 2000, the City adopted the City of Carson Natural Hazards Mitigation Plan for planning related to natural, man-made, and technological hazards. The City's Mitigation Plan was adopted by the Federal Emergency Management Agency on September 10, 2013. The Mitigation Plan generally provides a means to promote public policy designed to protect citizens, critical facilities, infrastructure, private property, and environment from natural hazards.

The overall mitigation goals of the plan are to do the following:

- Protect life, environment, and property
- Provide public awareness
- Preserve, rehabilitate, and enhance natural systems
- Strengthen communication and coordinate participation among agencies
- Strengthen emergency services including emergency operations plans and procedures

The proposed Project would be constructed in accordance with current design standards and building codes as discussed in Section 3.5.7, Geology and Soils, which is therefore consistent with the Mitigation Plan. Implementation of these standards and codes would minimize the loss of life and property from natural hazard events and protect public health and safety. As a development project, the proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services (also discussed more fully in Section 3.5.15, Public Services and Recreation) and warning systems. Therefore, the proposed Project would not substantively impair or interfere with the emergency response plan or evacuation plan and the potential impact is less than significant.

Alternative 3 is located on the same site as the Project and involves the same uses. Like the Project, Alternative 3 would be constructed in accordance with current design standards and building codes and

would be consistent with the City's Mitigation Plan. Therefore, Alternative 3 would not substantively impair or interfere with the emergency response plan or evacuation plan and the potential impact is less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hazards and hazardous materials (emergency response) would be less than significant.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Facts

The Project site is located in a developed urban area that is not subject to wildland fires. The proposed Project would be required to adhere to local and State Fire Code building requirements which include fire suppression and egress requirements that would minimize any fire hazards. Therefore, there would be no impact related to wildland fires and this issue is not discussed further.

Alternative 3 is located on the same site as the Project and involves the same uses. Like the Project, Alternative 3 would adhere to local and State Fire Code building requirements. Therefore, there would be no impact related to wildland fires, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative hazard and hazardous materials impacts (wildland fires) would not occur.

3.4.10 Hydrology and Water Quality

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Facts

Construction

The Project is located in a heavily urbanized area of the City and is presently fully developed. Project implementation would involve demolition and earthwork activities that would disturb site soils such that they could become exposed to the effects of wind and water erosion and transport sediments to receiving waters if not managed appropriately.

The analysis of potential impacts of construction activities, construction materials, and non-stormwater runoff on water quality during the demolition and construction phase focuses primarily on sediment and certain non-sediment-related pollutants. Construction-related activities that primarily result in sediment releases are related to exposing previously stabilized soils to potential mobilization by rainfall/runoff and

wind that can adversely affect receiving waters. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported downstream, including the Dominguez Channel, which could contribute to the degradation of water quality. Furthermore, during grading and temporary stockpiling of soil, there is the potential for soil migration off-site via wind (refer to Section 3.5.3, Air Quality, for further discussion of construction generated air quality impacts).

Non-sediment-related pollutants that are also of concern during construction include hazardous construction materials (e.g., fuels, lubricants, paint, and solvents); chemicals, liquid products, and petroleum products used in building construction or the maintenance of heavy equipment; and concrete-related pollutants.

The proposed Project would comply with the provisions of the NPDES General Permit for Storm Water Associated with Construction Activities (Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ, NPDES No. CAS000002), also known as the Construction General Permit. Because the Project site is greater than 1 acre in size, the Project Applicant would be required to submit a Notice of Intent to the Los Angeles RWQCB in order to obtain approval to complete construction activities under the Construction General Permit. This permit would include a number of design, management, and monitoring requirements for the protection of water quality and the reduction of construction phase impacts related to stormwater (and some non-stormwater) discharges. Permit requirements would include the preparation of a SWPPP, implementation and monitoring of BMPs, implementation of best available technology for toxic and non-conventional pollutants, implementation of best conventional technology for conventional pollutants, and periodic submittal of performance summaries and reports to the Los Angeles RWQCB. The SWPPP would apply to the Project as a whole and would include reference to the major construction areas, materials staging areas, and haul roads. Typical BMPs that could be incorporated into the SWPPP to protect water quality include the following:

- Diverting off-site runoff away from the construction site
- Vegetating landscaped/vegetated swale areas as soon as feasible following grading activities
- Placing perimeter straw wattles to prevent off-site transport of sediment
- Using drop inlet protection (filters and sandbags or straw wattles), with sandbag check dams within paved areas
- Regular watering of exposed soils to control dust during demolition and construction
- Implementing specifications for demolition/construction waste handling and disposal
- Using contained equipment wash-out and vehicle maintenance areas
- Maintaining erosion and sedimentation control measures throughout the construction period
- Stabilizing construction entrances to avoid trucks from imprinting soil and debris onto adjoining roadways
- Training, including for subcontractors, on general site housekeeping

Incorporation of required BMPs for materials and waste storage and handling, and equipment and vehicle maintenance and fueling would reduce the potential discharge of polluted runoff from construction sites, consistent with the state NPDES General Construction Permit and CALGreen requirements. Compliance with existing regulations would prevent violation of water quality standards and minimize the potential for

contributing sources of polluted runoff. Therefore, impacts to water quality from demolition and construction activities associated with the proposed Project would be less than significant.

Operations

The Project would involve the construction and operation of a mixed-use community. Land uses that could contribute pollutants to stormwater runoff in the long term include uncovered parking areas (through small fuel and/or fluid leaks), uncovered refuse storage/management areas, landscape/open space areas (if pesticides/herbicides and fertilizers are improperly applied), and general litter/debris (e.g., generated during facility loading/unloading activities).

During storm events, the first few hours of moderate to heavy rainfall could wash a majority of pollutants from the paved areas where, without proper stormwater controls, those pollutants could enter the Torrance Lateral Drainage Channel and Dominguez Channel. The majority of pollutants that could enter these waters would be dust, litter, and possibly residual petroleum products (e.g., motor oil, gasoline, diesel fuel). Certain metals, along with nutrients and pesticides from landscape areas, can also be present in stormwater runoff. Between periods of rainfall, surface pollutants tend to accumulate, and runoff from the first significant storm of the year ("first flush") would likely have the largest concentration of pollutants.

As a permittee subject to the Municipal Separate Storm Sewer System (MS4) NPDES permit, the City is responsible for ensuring that all new development and redevelopment projects comply with the performance criteria contained in the MS4 NPDES Permit. The MS4 NPDES Permit sets limits on pollutants being discharged into waterways and requires all new development and significant redevelopment to incorporate Low Impact Development (LID) features that are laid out in the 2014 Los Angeles County LID Manual. Incorporation of LID features into development projects is one of the main components of the Los Angeles County Municipal MS4 NPDES Permit. In accordance with the MS4 NPDES Permit, a project applicant must submit a comprehensive LID Plan and analysis demonstrating compliance with the LID Standards Manual (LACPW 2014), for review and approval by the Director of Public Works.

Project Low Impact Development Features

The proposed Project would be designed and constructed in accordance with the Municipal MS4 NPDES Permit and 2014 LID Standards Manual. The manual mandates completion of a LID Plan, as was completed for the proposed Project. The LID concept for the proposed Project is likely a stormwater capture and use system (Appendix H). Soils engineering recommendations suggest that ground infiltration is not possible at the site, however the installation of a stormwater harvesting tank can meet LID requirements. Rainwater harvesting collects rainwater from a surface that allows for the rainwater to be stored and used later. In a typical rainwater harvesting situation, rainwater is collected from an impervious surface such as the roof of a building and then stored inside of a tank or cistern. Rainwater can be collected from other surfaces as well such as parking lots, roadways, driveways, and even land surfaces. The runoff within the cistern will be pumped up for irrigation of the landscape around the Project Site. High flow outlets for the rainwater harvesting cistern will be routed to discharge into the County's storm drain system as per proposed conditions.

The primary pollutants of concern for the Project site (i.e., sediment, trash, and bacteria and viruses) would be addressed through pre-treatment settlement devices connected to harvesting tanks within the Project site. Pretreatment settling devices rely primarily on sedimentation, in which coarse sediments and debris sink or fall out of the collected stormwater. Some settling devices also provide secondary screening to improve the capture of floatables and sediment. Building roof run-off would be collected via roof drains and routed internally through the buildings and directed into the harvesting tank. Capture and use, commonly referred to as rainwater harvesting, collects and stores stormwater for later use, thereby offsetting potable water demand and reducing pollutant loading to the storm drain system.

Implementation of these LID features and BMPs would, to the maximum extent practicable, reduce the discharge of pollutants from the Project site into the Torrance Drainage Channel, including inadvertent release of pollutants, improper management of hazardous materials, and trash and debris. In accordance with CALGreen requirements, Project source control BMPs to improve water quality would be provided for outdoor material storage areas, outdoor trash storage/waste handling areas, outdoor loading/unloading areas, and building materials areas.

Conclusion

Water quality enhancement proponents of the Project, including implementation of a SWPPP, stormwater BMPs, and LID design, would minimize potential off-site surface water quality impacts and contribute to a reduction in water quality impacts within the overall Dominguez Channel Watershed. Construction of the proposed improvements associated with the Project could incrementally provide improvements to water quality over existing conditions, which would benefit downstream receiving waters. As a result, impacts would be less than significant.

Like the Project, Alternative 3 would adhere to the requirements of the NPDES Construction General Permit during construction, which would include preparation of and adherence to a stormwater pollution prevention plan, including best management practices to protect stormwater runoff. Like the Project, Alternative 3 would be subject to the requirements of the MS4 NPDES permit during operation, which sets limits on pollutants being discharged into waterways and requires all new development to incorporate low impact development features that are laid out in the 2014 Los Angeles County Low Impact Development Manual. Because Alternative 3 would be constructed on the same site as the Project and would adhere to all applicable requirements during construction and operation, Alternative 3 would have substantially similar impacts on hydrology and water quality to the Project. Impacts would be less than significant, and no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hydrology and water quality (surface or ground water quality and water quality standards) would be less than significant.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Facts

As previously discussed, construction activities for the Project involve the redevelopment of the Project site that would also include expansion of pervious surfaces with the addition of open space park areas. There are no proposed underground levels for this Project and no direct pumping of underlying groundwater supplies. According to the preliminary geotechnical report, groundwater at the Project site occurs at depths between 23.5 feet and 33.5 feet below ground surface. The historic high groundwater in the area was reported at depths of 20 feet. Although the proposed excavation would not likely be below the current groundwater level, it is still possible because of fluctuating groundwater levels, that groundwater is encountered during construction activities. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including all relevant NPDES requirements related to construction and discharges from dewatering operations. NPDES requires dischargers must demonstrate that discharges do not violate any water quality objective/criteria for the receiving waters, demonstrate that discharge shall not exceed effluent limitations, perform an analysis using a sample of groundwater or wastewater to be discharged, show discharge shall not cause acute nor chronic toxicity in receiving waters, that discharge shall pass through a treatment system if necessary, and must comply with the provisions of the NPDES permit. Otherwise, any dewatering that may be required for construction would be temporary and would have negligible effects on underlying groundwater supplies. Therefore, through compliance with regulatory requirements, potential impacts would be less than significant.

Regarding groundwater recharge, the Project Site is currently mostly impervious with approximately 99% impervious surfaces. Therefore, there is currently a very low potential for groundwater recharge occurring under existing conditions. The proposed Project would decrease the amount of impervious surface, allowing for an increased potential for on-site recharge. As such, the Project would not interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the West Coast Groundwater Basin.

Groundwater Management

The proposed Project would receive its water supply from Cal Water Dominguez District. As required by the California Urban Water Management Planning Act, Cal Water Dominguez District has prepared a 2020 Urban Water Management Plan (UWMP) for its service area that includes the Project site. In 2020, Cal Water Dominguez District met 13% of its demand from groundwater that was sourced from both the West Coast and Central Basins. Based on the UWMP, Cal Water plans to continue to use groundwater as a source for approximately 10%–20% of its total water supply.

As previously discussed, in accordance with the Sustainable Groundwater Management Act, the Department of Water Resources has determined that both of these basins have a very low priority regarding prioritizing the completion of a groundwater sustainability plan in large part because both basins are adjudicated. Cal Water has an allowable pumping allocation of 6,480 AFY from the Central Basin and 10,417 acre-feet per year (AFY) from the West Coast Basin, for a total allocation of 16,897 AFY. However,

currently, Cal Water's infrastructure is unable to fully extract its allowable pumping allocation but is projected to use no more than 5,885 AFY through to 2045.

The Cal Water Dominguez District 2020 UWMP also includes an analysis of water supply reliability projected through 2045. Based on the analysis, Cal Water would be capable of providing adequate water supply to its service area under a normal supply and demand scenario, a single dry-year supply and demand scenario, and multiple dry-year supply and demand scenarios, through 2045. Thus, the Cal Water Dominguez District UWMP accounts for increased demand as growth within the City occurs (Cal Water Service 2021).

According to the Project-specific Water Supply Assessment (WSA), the Project is estimated to have a total water demand of 182 AFY. Based on the existing water demand for the Project site of 31 AFY, the potable water demand for the Project site minus the existing demand is estimated at 151 AFY. This estimate is based on average rates for the different land uses of the proposed Project, as detailed in the WSA. It was noted in the WSA that irrigation return flows to groundwater and flows to the area's recycled water system were not factored into the Project demand calculations making the actual demand on the supply system conservative at 151 AFY.

As previously discussed, Cal Water Dominguez generally plans to source 10%–20% of its water supply from groundwater. Groundwater pumping volumes within the Dominguez District in recent years (not including desalinated brackish groundwater) have averaged 4,892 AFY from 2015 through 2020, which is lower than the average of 8,332 AFY from 2000 through 2014, reflecting Cal Water's successful implementation of water conservation measures in response to the drought and continued efficiency due to passive conservation and demand hardening. The Project's demand of 151 AFY would also only represent a marginal increase ranging from approximately 0.09% to 0.18% of Cal Water's allowable pumping allocation of 16,897 AFY from both the adjudicated Central and West Coast Basins.

The 2020 Cal Water Dominguez District UWMP has planned for growth within the Dominguez service area over the next 25 years. Cal Water has made an allowance for future demand estimates based on historical growth rates in the service area. Based on these projections, it would appear that Cal Water has adequately made allowance for water supply–demand increases for both domestic and commercial water supply, including groundwater, over the next 25 years. According to Table 4.2.3, Total Gross Water Use (Potable and Non-Potable), of the Cal Water Dominguez 2020 UWMP, Cal Water projects an increase in water demand of 4118 AFY between 2020 (32,968 AFY) and 2045 (33,086 AFY) (California Water Service 2021). According to the WSA, all supply sources available to the Dominguez District are considered highly reliable based on the findings of the 2020 UWMP. And while the proposed Project is not specifically identified in the UWMP, the plan does account for growth and increases in demand including those associated with the proposed Project. Further, the Dominguez District is currently projecting groundwater pumping significantly below the combined total of the Dominguez District's available rights (10,417.45 AFY of adjudicated rights in the West Coast Subbasin and 6,480 AFY in the Central Subbasin). Given the above, sufficient water supply is estimated to be available to Cal Water to meet future demands within the Dominguez District service area from 2020 through 2045 under all hydrologic conditions (i.e., current and projected, and for normal, single dry, and multiple dry years including a five-year drought period).

Therefore, with implementation of regional groundwater management plans and the adjudication of the basins, the Project would not substantially decrease groundwater supplies or impede sustainable ground

management of the relevant groundwater basins, as previously described. As a result, impacts would be less than significant.

Alternative 3 is located on the same site as the Project and involves the same uses at a lesser intensity. Therefore, with implementation of regional groundwater management plans and the adjudication of the basins, Alternative 3 would not substantially decrease groundwater supplies or impede sustainable ground management of the relevant groundwater basins. As a result, impacts would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hydrology and water quality (groundwater recharge) would be less than significant.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on- or off-site?

Facts

Construction

Construction activities would include earthwork activities which have the potential to temporarily alter existing drainage patterns and flows on the Project site by exposing the underlying soils, modifying flow direction, and making the Project site temporarily more permeable. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, Project construction activities would occur in accordance with City grading permit regulations (Chapter 8 of the Carson Municipal Code), including the preparation of an erosion control plan, as well as implementation of NPDES General Construction Permit requirements, such that construction activities for the Project would not substantially alter the Project site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required.

Operation

The Project Site consists nearly entirely of impervious surfaces under existing conditions. With implementation of the Project, the amount of impervious area would decrease with the addition of open space park areas and limited landscaping. However, there would be a limited potential for erosion or siltation to occur from these newly created pervious surfaces as they would be vegetated which reduces the potential for erosion or siltation. A decrease in total peak storm runoff flows is expected due to the proposed development, ranging from a decrease of 6% to 15% in the different storm flow event scenarios. This reduction in peak storm flows would also reduce the potential for the proposed changes in drainage patterns to result in erosion or siltation. Therefore, the Project would not substantially alter the existing

drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur and the potential impact is less than significant.

Like the Project, Alternative 3 would adhere to the requirements of the NPDES Construction General Permit during construction, which would include preparation of and adherence to a stormwater pollution prevention plan, including best management practices to protect stormwater runoff. Like the Project, Alternative 3 would be subject to the requirements of the MS4 NPDES permit during operation, which sets limits on pollutants being discharged into waterways and requires all new development to incorporate low impact development features that are laid out in the 2014 Los Angeles County Low Impact Development Manual. Because Alternative 3 would be constructed on the same site as the Project and would adhere to all applicable requirements during construction and operation, Alternative 3 would have substantially similar impacts on hydrology and water quality to the Project. Impacts would be less than significant, and no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hydrology and water quality (substantial erosion or siltation on-site or off-site) would be less than significant.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Facts

As previously described for threshold (c)(i), the proposed drainage system would decrease the total stormwater flows during peak storm events by 6% to 15% compared to existing conditions. As a result, flooding on- or off-site would not occur and the potential impacts would be less than significant.

As previously described for threshold (c)(i), Alternative 3's proposed drainage system would decrease the total stormwater flows during peak storm events compared to existing conditions. As a result, flooding on- or off-site would not occur and the potential impacts would be less than significant.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hydrology and water quality (surface runoff resulting in flooding) would be less than significant.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Facts

As previously discussed in significance threshold (c)(i), the proposed drainage system would decrease the rate or amount of surface runoff associated with a peak storm events. In addition, the Project would incorporate LID features including the installation of building roof drain downspouts, area drain, and planter drains to collect roof and site runoff. The Project would also direct stormwater away from buildings through

a series of storm drainpipes. In addition, the implementation of BMPs required by the County's LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff due to the collection of water to meet the regional LID guidelines. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required.

Like the Project, Alternative 3 would adhere to the requirements of the 2014 Los Angeles County Low Impact Development Manual. Because Alternative 3 would be constructed on the same site as the Project and would adhere to all applicable requirements during construction and operation, Alternative 3 would have substantially similar impacts on hydrology and water quality to the Project. Impacts would be less than significant, and no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hydrology and water quality (exceed stormwater drainage systems) would be less than significant.

iv) Impede or redirect flood flows?

Facts

The Project site is located in Zone X, Area with Reduced Flood Risk Due to Levee, per the Federal Emergency Management Agency (FEMA) flood insurance rate map, panel 06037C1935F, effective date September 26, 2008. This FEMA flood hazard designation is not current with respect to the proposed Project due to a determination that the channel cannot contain the 100-year flood. According to updated preliminary (December 21, 2018) FEMA maps with official delineation of Special Flood Hazard Areas for Los Angeles County, show the Project site as being located in the 500-year flood zone (LACFCD 2021). While this map has not received final approval by FEMA, it represents the most current data regarding flood risks for the Project site.

As previously noted, the Project site is currently developed and redevelopment with the proposed Project would result in a drainage pattern that would continue to discharge to the Dominguez Channel. As also mentioned, peak storm flows from the site would be reduced compared with existing conditions and, as a result, would not substantially alter the existing drainage pattern of the site in a manner that would impede or redirect flood flows. Regardless of whether the proposed Project elevations in the vicinity of proposed structures would be within Zone X (i.e., 0.2% annual chance of flooding) or potentially Zone A, a Special Flood Hazard Area (i.e., 1.0% annual chance of flooding), the site would continue to be developed with above ground improvements and would not impede or redirect flood flows such that there would be any adverse downstream flooding-related impacts. Therefore, flood related impacts would be less than significant, and no mitigation is required.

Alternative 3 is located on the same site as the Project. Therefore, like the Project, flood related impacts associated with Alternative 3 would be less than significant, and no mitigation is required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hydrology and water quality (flood flows) would be less than significant.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Facts

As previously described, the proposed Project would decrease the runoff volumes during peak storm events compared with existing conditions and would be required to meet drainage control requirements for volume capacity and water quality. Currently, the Project site is located in FEMA Zone X, with preliminary maps showing it to be in the 500-year flood zone but could potentially in the future be located within Zone A, a Special Flood Hazard Area. However, the Los Angeles County Flood Control District has begun analysis to develop improvement alternatives to address flood capacity. In the event that a flood did occur and inundate the Project site, the proposed Project would not be industrial in nature nor include the storage of substantive quantities of hazardous materials or pollutants, thus minimizing the potential for release of pollutants due to possible Project inundation. As described in Section 3.5.9, Hazards and Hazardous Materials, any small quantities of hazardous chemicals would be used in compliance with existing regulations and guidelines. The use, storage, and transport of hazardous materials and hazardous wastes would be subject to all applicable federal, state, and local health and safety laws and regulations that are intended to minimize the health risks to the public and the environment associated with hazardous materials. Otherwise, the Project site is not located within a coastal area or in the vicinity of an enclosed or semi-enclosed body of water such that the potential for tsunami or seiche waves is negligible. As a result, risk of release of pollutants due to flood-related hazards would be less than significant, and no mitigation is required.

Alternative 3 is located on the same site as the Project. Therefore, like the Project, flood related impacts associated with Alternative 3 would be less than significant, and no mitigation is required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hydrology and water quality (inundation) would be less than significant.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Facts

The proposed Project would comply with applicable water quality regulatory requirements, including implementation of a SWPPP, stormwater BMPs, NPDES MS4 stormwater design requirements, and LID design measures, which are consistent with Los Angeles RWQCB Basin Plan water quality objectives and policies and would contribute to a reduction in water quality impacts within the overall Dominguez Channel Watershed. In addition, with compliance with these regulatory requirements, the Project would reduce potential water quality impairment of surface waters such that existing and potential beneficial uses of key

surface water drainages throughout the jurisdiction of the Los Angeles RWQCB Basin Plan would not be adversely impacted. As a result, the Project would not conflict with or obstruct the Los Angeles RWQCB Basin Plan.

With respect to groundwater management, the Sustainable Groundwater Management Act empowers local agencies to form groundwater sustainability agencies to manage basins sustainably and requires those groundwater sustainability agencies to adopt groundwater sustainability plans for crucial groundwater basins in California. A groundwater sustainability agency has not been established for the West Coast Basin or Central Basin, as they are considered to be low-priority basins due to their adjudication and existing management measures. Further, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. As a result, the Project would not conflict with or obstruct sustainable management of the basins where water supply would be sourced from. Impacts are considered less than significant, and no mitigation measures are required.

Like the Project, Alternative 3 would adhere to the requirements of the NPDES Construction General Permit during construction, which would include preparation of and adherence to a stormwater pollution prevention plan, including best management practices to protect stormwater runoff. Like the Project, Alternative 3 would be subject to the requirements of the MS4 NPDES permit during operation, which sets limits on pollutants being discharged into waterways and requires all new development to incorporate low impact development features that are laid out in the 2014 Los Angeles County Low Impact Development Manual. Because Alternative 3 would be constructed on the same site as the Project and would adhere to all applicable requirements during construction and operation, Alternative 3 would have substantially similar impacts on hydrology and water quality to the Project. Impacts would be less than significant, and no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to hydrology and water quality (conflict with a groundwater management plan) would be less than significant.

3.4.11 Land Use and Planning

a. Would the project physically divide an established community?

Facts

The physical division of an established community typically refers to the construction of a linear feature (e.g., a major highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying area.

As described above, the Project site is located in a largely developed part of the City, characterized by a mix of residential and commercial uses. The Project site is bound by a concrete-lined channel to the north, South Avalon Boulevard to the east, East 213 Street to the south, and Grace Avenue to the west. The proposed Project involves the implementation of the IASP. The Project includes the removal and/or demolition of existing on-site structures and buildings and the construction of a mixed-use development.

Under the existing condition, the Project site is developed land and does not provide any connection between established communities. Instead, connectivity within the area surrounding the Project site is facilitated via local roadways. The Project does not include the construction of a new barrier that would impair mobility within the existing Project site or the surrounding area. Local connectivity in the area surrounding the Project site, including along South Avalon Boulevard, East 213 Street, and Grace Avenue, would be maintained. Additionally, the Project would improve connectivity within the Project area by providing a number of pedestrian and bicycle ways, including a pedestrian bridge that would link the Project site and the proposed District at South Bay project[8] that would provide access through the Project site.

As discussed in greater detail in Section 3.5.14, Population and Housing, the Project would result in the removal of the existing Mobile Home Park. The closure of the Mobile Home Park was approved by the City Council in July 2020 and the Mobile Home Park owner is proceeding with closure of the Mobile Home Park in accordance with mitigation measures identified in Relocation Impact Report No. 05-20. While the Project would not directly result in the relocation of the Mobile Home Park, it would result in the removal of the Mobile Home Park's residential units. However, upon completion, the Project would result in the development of a mixed-use residential neighborhood with 988 net new residential units.

As such, the Project would not impede movement within the Project area, within an established community, or from one established community to another. Therefore, impacts associated with the division of an established community would be less than significant.

Alternative 3 is located on the same site as the Project and involves the same uses at a lesser intensity. Therefore, like the Project, Alternative 3 impacts associated with the division of an established community would be less than significant.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to land use and planning (physically divide an established community) would be less than significant.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Facts

To evaluate the Project's impacts related to land use and planning, this analysis examines the Project's consistency with both regional and local plans, policies, and regulations that regulate uses on the Project site. These plans are as follows:

[8] The District at South Bay project involves the involves the development of residential, regional commercial, industrial/logistics, community serving commercial/retail, and active and passive open space uses.

- SCAG 2020–2045 RTP/SCS
- City of Carson General Plan
- City of Carson Municipal Code

Regional Transportation Plan/Sustainable Communities Strategy

The Project would not conflict with the applicable goals in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

City of Carson General Plan

Currently, the Project site has General Plan land use designations of Regional Commercial (east) and Low Density Residential (west) and is developed with a mobile home park. Per the City's General Plan, the Regional Commercial land use designation is intended to support a range of commercial uses such major department stores, specialty shops, other retail and service uses, automobile and other vehicle dealerships, and hotels and motels. The Low Density Residential land use designation is intended to support single-family detached dwellings and other development considered harmonious with such low-density residential development.

Under these existing conditions, the portion of the mobile home park that is located within the Regional Commercial land use designation operates as a non-conforming use as residential uses are not permitted within the Regional Commercial General Plan land use designation.

The Project involves a General Plan Amendment that would change the Project site's General Plan land use designation from Regional Commercial and Low Density Residential to Urban Residential. Per the General Plan, the Urban Residential General Plan land use designation is intended to provide for multiple dwelling units and a range of commercial uses, including retail, offices, hospitals, and private community gathering facilities. Residential densities up to 65 du/ac are allowed. The allowable density/intensity for mixed-use development is determined using an allowable range of floor area ratio (1.0 to 4.0). This land use designation is intended to be implemented with a Specific Plan zone. In this case, the IASP would implement the Urban Residential General Plan land use designation and would provide a means of implementing the City's General Plan.

Upon approval of the General Plan Amendment, the Project would be compatible with the Urban Residential land use designation. The IASP would allow for development of multiple dwelling units and select commercial, office, and medical-related uses. The IASP would allow for a gross Project density of 45 du/ac across the IASP area. The IASP would limit floor area ratio to a maximum of 1.5:1 as calculated over the entire Project area where buildings contain a mix of residential and commercial. Additionally, the specific development proposal, and any future development proposal in the IASP boundaries that may come thereafter, would be required to be consistent with the IASP. In the case of the proposed specific development proposal, the development would involve a mix of residential and neighborhood serving commercial uses that would be consistent with both the IASP and the Urban Residential General Plan land use designation. The proposed development that is part of the Project would involve the development of a mixed-use development featuring residential, commercial, and open space uses. The development would have a maximum gross density of 44.4 du/acre, and a floor area ratio of 1.26:1. The Project, inclusive of

the proposed development and IASP, would be consistent with the intent and regulations of the Urban Residential General Plan land use designation.

Approval of the General Plan Amendment would resolve conflicts between both the existing uses and the existing land use designations and the proposed uses. Nonetheless, the Project would still need to be consistent with the goals and policies of the General Plan.

General Plan elements evaluated for consistency include the Land Use, Economic Development, Transportation and Infrastructure, Housing, Safety, Noise, Open Space and Conservation, Parks, Recreation, and Human Services, and Air Quality Elements. Goals and policies that were not included in the consistency analysis were not included because they may either not be relevant to the Project (e.g., they pertain to industrial development and the Project does not involve industrial uses) or they may be City-level goals and policies that are implemented by the City (e.g., they may recommend that the City provide incentives for desired commercial uses; the Project Applicant would not be required to implement this measure and the Project would not impede the City in implementing this measure). The Project's consistency with the applicable goals and policies of the General Plan Elements demonstrates that the Project would not conflict with the General Plan goals and policies that have been adopted for the purpose of avoiding or mitigating an environmental effect.

City of Carson Municipal Code

Article IX, Planning and Zoning, of the City's Municipal Code, in conformance with the General Plan, regulates land use development in the City. In each zone, the zoning regulations specify the permitted and prohibited uses, and the development standards, including setbacks, height, parking, and design standards, among others.

Currently, the Project site is zoned Commercial, Automotive (east), and Residential, Multi-family, up to eight units per acre, with design overlay (RM-8-D) (west). Per the Municipal code, the Commercial, Automotive zone was created primarily to maximize and group retail sales of new automobiles at dealerships and promote the development of an auto sales district with consistent and appealing landscaping, lighting, signage and compatible architectural elements. The Residential, Multi-family, up to eight units per acre zone was created for the establishment, expansion and preservation of residential areas which are to be developed with multiple dwellings or combinations of single-family and multiple dwellings, and such other activities considered harmonious with such medium and high density residential development. Under these existing conditions, the portion of the mobile home park that is located within the Commercial, Automotive zone operates as a non-conforming use as residential uses are not permitted within the Commercial, Automotive zone.

The Project involves a zoning amendment that would change the Project site's zoning from Commercial, Automotive (east), and RM-8-D zone (west) to "Imperial Avalon Specific Plan". Approval of the proposed Project, in accordance with the provisions outlined in Article IX, Planning and Zoning, of the Municipal Code and State law, would ensure compliance with applicable zoning standards. Additionally, through the application process, City staff has reviewed the proposed development and determined that it would be in conformance with the proposed IASP.

Specific Plan

When a specific plan is adopted in accordance with the procedure outlined above, the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area, and becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted, and may define other types of design and permitting criteria. The proposed IASP would be adopted by ordinance and would function as the primary zoning document for the IASP area. Where the IASP is silent, the relevant sections and requirements of the zoning regulations shall apply. The development standards would be regulated by the IASP and administered and enforced by the City in accordance with the Municipal Code. The IASP supersedes any conflicts with Municipal Code zoning regulations. Therefore, upon approval of the proposed Project, the Project would be consistent with the Municipal Code for the purposes of avoiding or mitigating environmental effect.

As detailed within Section 2, Project Description, the Project includes the adoption of IASP. Implementation of the IASP would serve as a zoning amendment to the City's zoning code. Approval of a specific plan supplements relevant controls in the Municipal Code and General Plan by adding regulations specifically applicable to the site.

In accordance with State law (California Government Code Sections 65450 through 65457), a specific plan may be utilized for the systematic implementation of a City's General Plan. The IASP will be prepared, submitted, and approved in a manner consistent with California Government Section 65451, as well as the City's Municipal Code. The IASP would be adopted by ordinance and would serve as the zoning for the IASP area. The approved IASP area would be designated on the City's Zoning Map as "Imperial Avalon Specific Plan"[9]. The land use and development standards identified in this IASP document would supersede all zoning regulations to the extent that they would be in conflict with the sections of this IASP. Whenever the provisions contained in the IASP conflict with the Municipal or Zoning Codes, the provisions of the adopted IASP would take precedence. All future development within the Project site would be subject to these regulations, and each future implementing project would be required to undergo site plan review to ensure that each development is consistent with the scope of the Project discussed within this Draft EIR. As part of the processing of this Project, City staff will conduct a Site Plan Review of the proposed development to determine if it would be in conformance with the proposed IASP. With adoption of the IASP in accordance with State law and the City's Municipal Code, the Project would be compatible with the existing zoning regulations of the City. As such, the Project would not conflict with the Carson Municipal Code.

Conclusion

Based on the analysis provided above, the Project would be consistent with the SCAG 2020–2045 RTP/SCS, the General Plan, and the Carson Municipal Code. The IASP proposes to implement development standards and regulations to create a mix of residential and neighborhood-serving commercial land uses that would be consistent with the General Plan's proposed Urban Residential land use designation. The IASP would promote the transformation of the Project site into a mixed-use development. The mix of land uses within the Project site, including multifamily residential and commercial uses, would reduce automobile trips by creating a pedestrian-oriented, multi-modal environment. Thus, the proposed Project

[9] A numeric designation would be provided upon Project approval.

would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project site adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

As with the Project, Alternative 3 would include a General Plan Amendment, Zone Change, and the adoption of the proposed IASP. Upon adoption, the IASP would constitute the zoning for the Project site, and the land use and development standards identified in the IASP would supersede all zoning regulations to the extent that they would be in conflict with the sections of the IASP. Both the developments contemplated under Project and Alternative 3 would be required to comply with the development regulations of the proposed IASP, and thus, would not result in conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Because the uses proposed under Alternative 3 are the same as the Project, aside from a slight reduction in residential units and total residential square footage, Alternative 3 would also be supportive of the goals of the SCAG 2020–2045 RTP/SCS and the City's General Plan policies in a similar way as the Project. Like the Project, impacts related to land use and planning under Alternative 3 would be less than significant and no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts related to land use and planning (consistency with applicable land use plans, policies, and regulations) would be less than significant.

3.4.12 Mineral Resources

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Facts

According to the City's General Plan, no known significant mineral resources are located within the City (City of Carson 2002). No mineral extraction activities occur on or adjacent to the Project site, and no known mineral resources are present on site. Thus, impacts associated with mineral resources would not occur.

Alternative 3 is located on the same site as the Project and involves the same uses at a lesser intensity. Therefore, like the Project, Alternative 3 impacts associated with mineral resources would not occur.

Finding

The City finds based on substantial evidence that project-level and cumulative mineral resources impacts would not occur.

3.4.13 Noise

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Facts

The Project would result in the generation of short-term construction noise and long-term operational noise. During construction, noise would be generated by heavy machinery and mechanical equipment to construct the Project, as well as by heavy trucks accessing the Project site to deliver and remove construction materials and waste. During operation, noise would be generated by residents and retail customers accessing the Project site, persons using outdoor amenities, the operation of mechanical equipment such as heating, ventilation, and air conditioning (HVAC) equipment, garbage trucks accessing the Project site, and by people using designated parking areas. As discussed in detail below, despite implementation of mitigation measures to reduce the effects of these impacts, impacts associated with short-term construction noise would be significant and unavoidable; impacts associated long-term operational noise would be less than significant.

Short-Term Construction Noise

Significant and Unavoidable Impact**.** Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., grading, paving, building construction). Construction of the proposed Project would generate noise that could expose residential receptors to elevated noise levels that may disrupt communication and routine activities. The closest receptors would be the residences located approximately 5 feet away from construction. However, construction activities would occur throughout the Project site and would not be concentrated at a single point near sensitive receptors. Furthermore, typical operating cycles for construction equipment tend to involve 1–2 minutes of full power, followed by 3–4 minutes at lower power levels—that is, they do not generate sustained maximum noise levels and instead exhibit the effects of what the Federal Highway Administration's Roadway Construction Noise Model calls an "acoustical usage factor" that accounts for this variability of power or load and thus noise emission.

The loudest construction phase would be the grading phase as heavy-duty construction equipment may be used near the closest sensitive receptors (i.e., approximately 5 feet). To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all heavy construction equipment were assumed to operate simultaneously and be located at the construction area nearest to the affected receptors.

Adjacent residential receptors could be exposed to temporary and intermittent noise levels ranging from 70.4 to 114.2 A-weighted decibel (dBA) (without mitigation). The noise levels presented in Table 4.10-9 of the EIR are conservative, as these noise levels assume the simultaneous operation of all heavy construction equipment during the demolition and grading phases at the same precise location. Modeled heavy construction equipment include excavators, dozers, tractors, and crushing equipment during the demolition phase and excavators, graders, loaders, and vibratory drivers during the grading phase. It should also be acknowledged that construction activities would occur during normal daytime hours (between 7:00 a.m.

and 8:00 p.m.) to avoid noise disturbances at nearby receptors during the more sensitive hours (between 8:00 p.m. and 7:00 a.m.)

Construction noise levels during demolition and grading activities would exceed the construction noise threshold of 60.1 dBA, which is 5 decibels (dB) above the existing outdoor ambient sound level at offsite sensitive receptors. To substantially reduce construction-generated noise at nearby receptors, the proposed Project would be required to implement MM-NOI-1 and MM-NOI-2. MM-NOI-1 would include the designation of a "Noise Disturbance Coordinator" and orientation of stationary construction equipment away from nearby sensitive receivers, among other requirements. Further, implementation of MM-NOI-2 would reduce the Project's construction noise levels by at least 10 dBA with the use of a temporary noise barrier or enclosure along the southern/southwestern portion of the Project site to break the line of sight between the construction equipment and the adjacent residences. Construction noise levels during the demolition and grading phase, with implementation of MM-NOI-1 and MM-NOI-2, would be 60.4 dBA and 104.2 dBA, respectively. Therefore, construction noise levels would exceed the construction noise threshold of 60.1 dBA during the demolition and grading phases. No further mitigation measures are feasible. Thus, construction noise impacts would be significant and unavoidable.

Construction Truck Trips

Construction activities would also cause increased noise along access routes to and from the Project site due to movement of equipment and workers, as well as hauling trips. As detailed in the Project noise report, construction activities would include demolition of buildings that result in quantities of material hauling trips. Similarly, grading at the Project site would require thousands of cubic yards of imported material that would add the total average daily trip quantity, as would construction worker trips to and from the Project site. As a result, mobile noise sources due to this added Project construction traffic would temporarily increase roadway traffic along access routes to and from the Project site during construction. Of course, mobile traffic noise from Project construction trips would be temporary and would cease upon completion of on-site construction activities.

Reference noise levels from heavy vehicles comparable to a haul truck (i.e., concrete mixer trucks, drill rig trucks, and dump trucks) range from 84 to 85 dBA (presumed maximum continuous sound level (L_{max})) at a distance of 50 feet. Sensitive receptors (i.e., residential uses) along Grace Avenue and 213th Street would be located as close as 25 feet from haul truck operations during construction. At this distance, and assuming an idling haul truck or the moment that a haul truck drives past the receptor position, estimated operation noise levels would range from 90 to 91 dBA and under such conditions would exceed the construction noise threshold of 60.1 dBA. If just one haul truck, exhibiting this afore-stated range of reference L_{max} sound level, were to make a 5-second duration pass-by in the proximity of the studied receptor position over a 10-minute period, which is the same as the sampling duration for the equivalent continuous sound level (L_{eq}) values appearing in Table 4.10-2 of the EIR, the sound energy of that truck pass-by would be spread over that period and result in an estimated energy-averaged sound level (L_{eq}) of 64 dBA L_{eq}, which still exceeds the adopted 60.1 dBA L_{eq} standard. More than one truck trip or pass-by occurring within this 10-minute time period would increase the predicted noise level by 3 dB for every doubling of haul truck trips (or comparably noisy vehicles).

Therefore, MM-NOI-2 and MM-NOI-3 shall be implemented to reduce haul truck trip noise levels at sensitive receptors. MM-NOI-2 would reduce the Project's construction noise levels by at least 10 dB with the use of a temporary noise barrier or enclosure along the southern portion of the Project site to break the line of sight between haul truck operations and the adjacent residences. MM-NOI-3 would route haul truck trips away from sensitive receptors and limit haul truck deliveries to the same hours specified for construction equipment (between the hours of 7:00 a.m. to 8:00 p.m. on weekdays and Saturdays only). Specifically, MM-NOI-3 would include a haul route exhibit specifying site access for construction hauling trips along Avalon Boulevard. The nearest sensitive receptor would be located along 213th Street at a distance of approximately 520 feet from the closest potential access point for construction hauling trips along Avalon Boulevard. Accounting for MM-NOI-2 and MM-NOI-3, estimated haul truck noise levels would range from 53.7 to 54.7 dBA at the nearest sensitive receptor. Therefore, haul truck noise levels would not exceed the construction noise threshold of 60.1 dBA and impacts would be less than significant with implementation of MM-NOI-2 and MM-NOI-3. Impacts would be less than significant with mitigation incorporated.

Long-Term Operational Noise

Roadway Traffic Noise

The proposed Project would result in additional traffic on adjacent roadways from daily activities, thereby increasing vehicular noise in the vicinity of existing and proposed land uses. Based on the Imperial Avalon Local Transportation Assessment (Transportation Assessment), typical daily activities are forecast to generate 5,586 net new average daily trips, including net new 402 trips during the a.m. peak hour and 457 trips during the p.m. peak hour. The calculated traffic noise levels for the "Future Year Without Project" and "Future Year With Project" scenarios are compared with each other. Under the "Future Without Project" scenario, noise levels would range from approximately 49.4 dBA to 75.1 dBA, with the highest noise levels occurring along the Avalon Boulevard segment from M.L.K. Jr. Street to Del Amo Boulevard. The "Future Year With Project" scenario noise levels would range from approximately 52.5 dBA to 75.2 dBA, with the highest noise levels also occurring along the Avalon Boulevard segment from M.L.K. Jr. Street to Del Amo Boulevard.

The Project would have a significant impact if the "Future With Project" prediction scenario exhibits traffic noise levels that are greater than those of the "Future Without Project" scenario traffic noise levels by more than 5 dBA Community Noise Equivalent Level (CNEL) at the affected sensitive land use within the "normally acceptable" or "conditionally acceptable" category, or an increase of 3 dBA CNEL at the affected sensitive land use within the "normally unacceptable" or "clearly unacceptable" category; therefore, significance threshold values are based on these land-use/noise compatibility categories. The "Future With Project" traffic noise levels would not exceed the 5.0 dBA or 3.0 dBA Increase Significance Thresholds along any of the surrounding roadways. Therefore, a less-than-significant impact would occur in this regard.

Stationary Operational Noise

Outdoor Gathering Areas

The Project would include a 3,000-square-foot dog park, a 7,200-square-foot greenbelt, and an 18,300-square-foot central park in the center of the Project site. The Project would also include a courtyard in the center of both Buildings A and B. These proposed parks have the potential to be used as outdoor gathering areas that could be accessed by groups of people intermittently for outdoor events (i.e., parties, lunch, dinner, etc.). Noise generated by groups of people (i.e., crowds) is dependent on several factors including vocal effort, impulsiveness, and the random orientation of the crowd members. Crowd noise is estimated to be 60 dBA at 1 meter (3.28 feet) away for raised normal speaking between two individuals (Hayne 2006). This noise level could feature a 5 dB upward adjustment for the impulsiveness of the noise source, and a -3 dB adjustment for the random orientation of the crowd members (Hayne 2006). For an assembly of, for instance, 200 park visitors having conversational speech at this level, the aggregate crowd noise would be approximately 82 dBA at 1 meter (3.28 feet) if treated as a point source centrally disposed in a park or greenbelt area. The 20 dB increase in the source magnitude is due to the quantity of the conversations simultaneously occurring (i.e., equal to 10*LOG[100]). Because sound naturally attenuates geometrically with distance (i.e., decreases by 6 dBA for each doubling of distance from a point source), the resulting estimated crown noise at the nearest sensitive receptor (residential property to the south located approximately 330 feet away from the nearest outdoor gathering area, the greenbelt) would be 42 dBA. Proposed three-story townhomes on Lot E would be in between this greenbelt area and the nearest sensitive receptor, shielding this sensitive receptor and thereby reducing noise levels by approximately a minimum of 5 dB. Thus, noise from a crowd of this studied size would be around 37 dBA, which is substantially below the City's 50 dBA daytime and 45 dBA nighttime noise standard for residential properties. As such, Project-related operational noise associated with outdoor gathering areas would not result in a temporary or permanent increase in ambient noise levels in excess of the City's noise standards, and impacts would be less than significant.

Mechanical Equipment

The Project would include HVAC units located at on the roofs of the proposed three-story townhomes (45 feet in height) and atop the multifamily buildings. For the purposes of this analysis, given that HVAC units atop the multifamily buildings would be located at further distances to the sensitive receptors than from the townhome units (i.e., townhomes units are closer to the sensitive receptors), HVAC units for the townhome units are discussed to provide a more conservative analysis. HVAC systems can result in noise levels of approximately 55 dBA Leq at 2.9 feet from the source (Berger et al. 2010). The nearest sensitive receptor is located adjacent to the proposed townhomes, on the southern portion of the Project site, and the subsequent HVAC unit is approximately 30 feet to the south. This would place the HVAC units approximately 45 feet up and 30 feet to the north of the nearest sensitive receptors. Geometrically, this means that the HVAC unit could be located as close as 54 feet from a sensitive receptor. In addition, the HVAC units would not be visible to the nearest sensitive receptors as a parapet would separate the proposed townhomes and receptors. The resulting path occlusion between source and receptor would be expected to yield further HVAC unit noise attenuation of 5 dB. Therefore, the closest HVAC unit could produce a noise level of approximately 25 dBA. Even with as many as ten HVAC units producing comparable sound levels and at comparable distance to a common receptor point, the logarithmically combined noise

level would be approximately 35 dBA due to acoustic principles (i.e., 25 + 10*LOG[10] = 35). Compared with the higher City's daytime (50 dBA) and nighttime (45 dBA) noise standards, exceedance due to operation of HVAC units at the Project site is not expected; therefore, impacts would be less than significant in this regard.

Garbage Trucks

The proposed Project would involve occasional trash/recycling pickups from slow-moving garbage trucks. Trash/recycling pickup would occur throughout the site. Low-speed truck noise results from a combination of engine, exhaust, and tire noise, as well as the intermittent sounds of back-up alarms and releases of compressed air associated with truck air-brakes. However, trash/recycling truck operations would be short-term and irregular and are considered part of standard operations in the area (i.e. existing trash/recycling collection activities at adjacent uses) and would not differ from the existing garbage truck operations on the Project site. Therefore, trash/recycling pickups would not introduce a new intrusive noise source compared to existing conditions. As such, a less-than-significant impact would occur in this regard.

Parking Areas

Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to adjacent noise-sensitive receptors. Conversations in parking areas may also be an annoyance to adjacent sensitive receptors. According to the Project noise report, sound levels of speech typically range from 33 dBA at 48 feet for normal speech to 50 dBA at 50 feet for very loud speech.

The Project proposes approximately 2,026 parking spaces within parking structures split between buildings A through D, and individual garages within the townhomes. Much of the parking, approximately 818 spaces, would be located within individual townhome garages and would not be a source of a parking lot noise. There would also be surface parking stalls in Lot E and within the internal drive aisles of the multifamily portion of the Project to serve guests, but would not be a source of substantial parking lot noise. The remainder of the parking spots would be split between buildings A through D and would be located within an at or above-grade parking structure. The nearest sensitive receptor would be located approximately 125 feet to the south of the proposed parking structure within building D. Parking lot noise levels could range between 53 dBA and 63 dBA at 50 feet. At a distance of 120 feet, parking lot noise would range from 45 to 55 dBA. However, parking lot noise is anticipated to be lower than the levels calculated as the parking structures would be predominantly enclosed. Furthermore, a large existing wall located at along the Project site's southern border would separate the proposed parking structure in buildings C and D and sensitive receptors, further attenuating the parking lot noise levels. The combination of the predominantly enclosed parking structure and wall would lower parking lot noise levels by at least 10 dBA.

Therefore, estimated parking lot noise would range from 35 to 45 dBA. It should also be noted that only the southwestern portion of the parking structure in Buildings C and D would be located at this distance; a majority of the parking structure and spaces would be located farther away and would yield

lower parking lot noises. As such, parking lot noise levels would not exceed the City's daytime (50 dBA) and nighttime (45 dBA) noise standards and noise impacts from parking lot activities would be less than significant.

Construction activities for Alternative 3 would generally be the same as the proposed Project and would require the use of construction equipment throughout the entire site, similar to the Project. Due to the necessity to use construction equipment throughout the entire site, Alternative 3 would not result in construction activities occurring further away from sensitive receptors. Granted, building construction would occur further away from the sensitive receptors, but the construction phases that generate the most noise (i.e., demolition and grading), would still occur in the same locations as under the Project. Given that the same construction activities would occur for Alternative 3 as the Project (and in the same locations), Alternative 3 would similarly result in significant and unavoidable short-term construction noise impacts. Implementation of MM-NOI-1 and MM-NOI-2 would be required to reduce the severity of this impact for Alternative 3, but not to below a level of significance. As such, Alternative 3 would result in significant and unavoidable short-term construction noise impacts, but with reduced severity as compared to the Project given the shortened building construction phase that would be necessary.

Alternative 3 would generally involve the same construction components as the Project, including similar use of construction truck trips, and would result in similar construction truck trip noise. With implementation of MM-NOI-3, construction truck trip noise impacts for Alternative 3 would be less than significant with mitigation incorporated, similar to the Project.

Alternative 3 would result in 160 fewer daily trips than the Project, which would result in corresponding decreases in roadway traffic noise generated. Although roadway traffic noise impacts are already less than significant, Alternative 3 would result in a lesser amount of roadway traffic noise generated than the Project.

Alternative 3 would result in a less-dense project with 98 fewer residential units than the proposed Project. Due to these reductions, noise levels associated with these sources would be marginally reduced. Similar to the Project, noise impacts associated with stationary operational sources for Alternative 3 would be less than significant and marginally reduced.

Finding

In accordance with CEQA Guideline Section 15091(a)(1) and Public Resources Code Section 21081(a)(1), the City finds that with implementation of Mitigation Measures NOI-2 and NOI-3, changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect with regard to construction truck trips. Thus, after implementation of these mitigation measures, project-level construction truck trip noise impacts would be reduced to a level of less than significant.

Although Mitigation Measures NOI-1, NOI-2, and NOI-3 will reduce the severity of project-level construction-related noise impacts, they will not reduce the impacts to a less-than-significant level. Despite incorporation

of this mitigation, impacts resulting from project-level construction noise during the demolition and grading phases remain significant and unavoidable.

In accordance with CEQA Guideline Section 15091(a)(3) and Public Resources Code Section 21081(a)(3), the City further finds that specific economic, legal, social, technological, or other considerations make infeasible any mitigation measures or other alternatives that would reduce or avoid Alternative 3's impacts resulting from project-level construction noise during the demolition and grading phases, which remain significant and unavoidable.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Facts

Activities associated with Project construction and operation would produce varying levels of vibration. During construction, heavy machinery used to construct the Project would generate construction noise as pieces of equipment move around the Project site, and vibratory drivers would generate construction noise as temporary shoring is installed to protect construction workers working at subsurface grades. During operation, vehicles such as delivery trucks and garbage trucks would generate small amounts of vibration as they access the Project site. As discussed in detail below, short-term construction noise impacts would be less-than-significant with mitigation incorporated; long-term operational impacts would be less than significant.

Short-Term Construction

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Caltrans Transportation and Construction Vibration Manual (Caltrans 2020a) identifies various vibration damage criteria for different building classes. This evaluation uses the Caltrans architectural damage criterion for continuous vibrations at older residential structures of 0.3 inch-per-second peak particle velocity (PPV). Further, as the nearest sensitive receptors to Project construction are residents, the criterion for human annoyance of 0.2 inch-per-second PPV is used. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural.

Construction of the proposed Project would occur over approximately 60 months and would include demolition, grading, paving, building construction, and architectural coatings. Construction activities are anticipated to require temporary shoring during the grading phase, off-site utility and signalized intersection improvements during the paving phase, pedestrian bridge construction during the building construction

and paving phase, and vapor barrier installation during the building construction phase. The highest degree of groundborne vibration would be generated during the grading construction phase due to the operation of a vibratory driver during temporary shoring activities adjacent to residential structures along the south and southwestern Project boundary.

Construction activities are anticipated to occur up to the Project boundary line. Therefore, the nearest structures (i.e., residential uses) would be located approximately 5 feet to the south and southwest of the Project site boundary. Vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.034 to 8.206 inches per second PPV at 5 feet from the source of activity. Therefore, construction groundborne vibration would exceed the human annoyance criterion (0.2 inch-per-second PPV) and the structural damage criterion (0.3 inch-per-second PPV). As such, MM-NOI-4 would be required to reduce vibration impacts to a less-than-significant level. MM-NOI-4 is directly related to vibration control, as it requires a qualified professional to prepare construction vibration mitigation plans and to use pneumatic impact equipment. It also requires a buffer distance for heavy equipment operation adjacent to sensitive uses and structures. With implementation of MM-NOI-4, impacts would be less than significant with mitigation incorporated.

Long-Term Operational

During operation, vehicles such as delivery trucks and garbage trucks would generate small amounts of vibration as they access the Project site. FTA guidance indicates that a loaded truck would exhibit no more than 0.076 inches PPV at a reference distance of 25 feet (FTA 2018). This reference PPV value can be used describe a transient vibration event such as a garbage truck passing by a residence. At a distance of only 28 feet between the point of pass-by and the receiving residential structure, assumed to be a modest wood-frame structure, which would thus exhibit a small vibration coupling loss between its foundation and the surrounding earth (FTA 2018), would result in an estimated interior vibration level of less than 0.035 inches per second, and would thus be below what Caltrans considers a “barely perceptible” threshold for transient sources (Caltrans 2020a). Thus, garbage truck pass-by vibrations is unlikely to be perceived by residential occupants surrounding the Project site. The proposed Project would not otherwise involve other sources of vibration, such as railroads or substantial heavy truck operations, and therefore would not result in vibration impacts at surrounding uses. Thus, impacts would be less than significant.

Activities associated with construction and operation of the Project would produce varying levels of vibration. During construction, heavy machinery used to construct the development would generate construction as pieces of equipment move around the Project site, and vibratory drivers would generate construction as temporary shoring is installed to protect construction workers working at subsurface grades. As discussed in Section 4.10, Project impacts associated with groundborne vibration would be less than significant with incorporation of MM-NOI-4, which requires a qualified professional to prepare construction vibration mitigation plans and to utilize pneumatic impact equipment. It also requires a buffer distance for heavy equipment operation adjacent to sensitive uses and structures. Construction of Alternative 3 would require the same construction techniques as the Project, and vibration impacts would be similar to those of the Project. MM-NOI-4 would be required for Alternative 3, and with implementation of mitigation, vibration impacts of Alternative 3 would be less than significant with mitigation incorporated. During operation of the Project, vehicles such as delivery trucks and garbage trucks would generate small amounts of vibration as they access the Project site. However, for the Project, these vehicles would

generate vibration levels that were deemed to be less than significant. Alternative 3 would also involve the use of garbage trucks and delivery trucks during operation, and operational vibration impacts would similarly be less than significant.

Finding

In accordance with CEQA Guidelines Section 15091(a)(1) and Public Resources Code Section 21081(a)(1), the City finds that with implementation of Mitigation Measure NOI-4 changes or alterations have been required in, or incorporated into, the project would avoid or substantially lessen the significant environmental effect with regard to noise (construction vibration) as identified in the Final EIR. Thus, after implementation of Mitigation Measure NOI-4, impacts related to vibration noise would be less than significant.

c. ***For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

Facts

Because the nearest airport to the Project site is the Compton/Woodley Airport located approximately 3.5 miles to the northeast in the City of Compton, and according to the General Plan, the 60 dBA and 65 dBA noise contours from the Compton/Woodley Airport do not extend into the City of Carson, no workers or proposed residents of the Project site would be expected to experience excessive aviation noise exposures. Additionally, the Project site is not located within the vicinity of a private airstrip or related facilities. For these reasons, no impacts in this regard are anticipated.

Alternative 3 is located on the same site as the Project and involves the same uses at a lesser intensity. Therefore, like the Project, Alternative 3 noise impacts associated with airports would not occur.

Finding

The City finds based on substantial evidence that project-level and cumulative noise impacts (private airstrip or public airport) would not occur.

3.4.14 Population and Housing

a. ***Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

Facts

Construction

The Project involves relocation of existing on-site structures and the construction of up to 1,213 high-density residential dwelling units and up to 10,352 square feet of commercial and food service uses. The

Project would generate part-time and full-time jobs associated with Project construction for the duration of construction. Construction of the Project is anticipated to occur over a period of approximately 60 months. However, given the relatively temporary nature of the construction period, the demand for construction employment would likely be met within the existing and future labor market in the City and County. If construction workers reside outside of the City, these workers would likely commute to the Project site during the temporary construction period. The construction employment generated by the Project is not expected to increase the residential population of the City directly or indirectly and would not induce unplanned population growth or require permanent housing. Therefore, the Project's population growth impacts related to construction activities are considered less than significant. No mitigation is required.

Operation

The Project involves demolition of existing on-site structures and the construction of up to 1,213 mid-to-high-density residential dwelling units and up to 10,352 square feet of commercial and food service uses, Residential dwelling units and full-time job opportunities have the potential to result in population growth in the City.

The worst-case scenario would assume that all additional future residents currently reside outside the City and would relocate to the City. However, it is likely that at least some of the future residents would be existing City residents. However, SCAG's average household size can also be used to determine the anticipated residential population. According to SCAG's 2020–2045 RTP/SCS, there was an increase in average household size in the SCAG region from 3.04 in 2010 to 3.1 in 2016, but it is anticipated the average household size will decline from 3.1 in 2016 to 2.9 in 2045 (SCAG 2020a). Typically, household sizes for residential projects in the City are computed based on the General Plan's household size, but due to the lack of apartments in the City, this metric can overestimate actual household size for apartments. Therefore, in order to evaluate the appropriate occupancy metrics for the rental apartment units in the proposed Project, a study was prepared to analyze actual household sizes for comparable projects in Carson and the broader Los Angeles County region (RCLCO 2020). The Project's townhome population was determined using the City's standard household metric in Table 7 of the City's Housing Element (City of Carson 2004). Using this methodology, the estimated Project population is approximately 3,042 residents.

SCAG's employment density factors can be used to determine the anticipated employment opportunities. According to SCAG's Employment Density Report, the average square foot per employee in the County is 424 square feet per employee for retail uses (SCAG 2001). Thus, the Project's 10,352 square feet of retail would generate approximately 24 employment opportunities. However, these 24 new employees are anticipated to be current residents of the City.

Population

Demographic projections for the City, as developed by SCAG, indicate the City's population is anticipated to increase from 93,600 persons in 2016 to 105,200 persons in 2045, an increase of 11,600 persons. The SCAG region's population is anticipated to increase from 19,518,000 persons in 2020 to 22,504,000 persons in 2045, an increase in 2,986,000 persons (SCAG 2020a).

Upon Project completion, it is possible that existing City residents could move into the proposed residential units. Accounting for the 373 residents were residing on the Project site as of the environmental baseline date (which is a conservative estimate given that prior to circulation of the Draft Environmental Impact Report, dozens of resident households had already permanently relocated to other housing away from the Project site pursuant to early termination agreements entered into in accordance with Resolution No. 20-113), it is assumed that 2,669 potential residents would move to the proposed units from a location outside the City. As described previously, SCAG has projected that the City will undergo an increase of 11,600 people from 2016 to 2045. The population growth anticipated to occur as a result of the Project (2,669 persons) represents 23% of the City's projected population growth for 2016 to 2045, and 0.09% of the SCAG region's projected population growth in the same time period. Therefore, the Project would not exceed the projected growth for the City, nor would it exceed the population growth projections for the SCAG region. It should be noted that while the Project may allow population growth in the City, the construction of 1,213 new residential units would supplement the City's housing stock and support the City's 6th cycle Regional Housing Needs Assessment (RHNA) allocation, which shows a need for 5,618 additional housing units.

Other factors are also taken into consideration regarding a project's ability to substantially increase population growth. For instance, the removal of impediments to growth (e.g., constructing utility infrastructure and service systems in a previously undeveloped region) can induce growth. However, the Project would not have the potential induce growth via infrastructure development or expansion. The Project site is in a highly urbanized area and is surrounded by a mix of residential, commercial, industrial, and public land uses. The surrounding area is developed and supported by existing infrastructure. Thus, the Project would include connections to existing utilities and infrastructure and would not result in the extension of infrastructure or roads into an undeveloped area leading to substantial population growth.

Housing

Housing projections for the City, as developed by SCAG, indicate the number of households in the City is anticipated to increase from 25,500 households in 2016 to 30,700 households in 2045, an increase of 5,200 households. Based on SCAG's growth projections for housing, the Project's net new 988 dwelling units would represent 19% of the 5,200 households projected to be added to the City between 2016 and 2045.

Additionally, the Project would contribute to state-mandated RHNA housing goals and would be consistent with regional efforts to boost housing growth to meet regional housing needs. In its 6th Cycle RHNA, adopted on March 4, 2021 and updated on July 1, 2021, SCAG identifies the City's share of housing needs as 5,618 new units (SCAG 2021). In response to the RHNA allocation, cities must update the Housing Element of the General Plan to address how to meet the housing needs allocation. Cities must prepare an annual progress report on the jurisdiction's status and progress in implementing its housing element, and thus, meeting its RHNA allocation. The City has identified the Project site for inclusion in its 6th Cycle RHNA Allocation, and additional housing development is needed in the City to meet local and regional housing goals.

The Project would not result in unplanned population growth in the City as a result of increased housing opportunities, as the number of dwelling units proposed as part of the Project is within the anticipated growth in the City, as projected by SCAG and as mandated by the 6th Cycle RHNA.

Employment

As indicated by SCAG, the projected number of jobs in the City is anticipated to increase from 63,400 in 2016 to 70,000 in 2045, for an increase of 6,600 jobs. As previously discussed, the Project would generate approximately 24 new employment opportunities. Based on SCAG's projected employment growth, the Project's anticipated 24 employees would represent approximately 0.36% of the 6,600 jobs that are expected to be added in the City between 2016 and 2045. As such, the Project is consistent with the projected employment growth for the City and would not result in unplanned population growth as a result of increased employment opportunities.

Jobs-to-Housing Ratio

The City is considered to be jobs-rich, given the jobs-to-housing ratio is greater than 1, and it is also higher than the ratio for the SCAG region. The Project would add a net increase of 988 new residential units and approximately 24 jobs. Since the Project would add more housing units than jobs to the Project site, the Project would lower the City's job-to-housing ratio and provide greater housing opportunities for existing residents within the City. However, growth projections for the City indicate that the jobs-to-housing ratio would remain high in 2045. Since the Project is within the anticipated growth projections, and adds housing in a jobs-rich City, the Project would not result in an imbalanced a job-to-housing ratio. In addition, due to the mixed-use nature of the Project, and the fact the Project provides more housing than jobs, the Project would not cause an imbalance (or exacerbate the City's existing imbalance) among jobs, housing, and population.

Summary

Once operational, the proposed 988 net new units associated with the Project would generate approximately 2,669 new residents to the City. The Project would not exceed the projected growth for the City or the SCAG region between 2016 and 2045. The population growth anticipated to occur as a result of the Project (2,669 people) represents 23% of the City's projected population growth for 2016 to 2045, and 0.09% of the SCAG region's projected population growth in the same time period. In addition, the Project's 988 net new residential units would contribute to the City's Housing Element objectives and policies and the state-mandated RHNA housing goals. The Project would also add approximately 24 new employment opportunities to the City, representing a modest 0.38% of the anticipated jobs that are expected to be added to the City between 2016 and 2045.

As further discussed in Section 3.5.22, Other CEQA Considerations, the Project site is in a highly urbanized area and is surrounded by a mix of residential, commercial, industrial, and public land uses. Given the developed nature of the surrounding area the proposed internal roadway network, utility connections, and utility infrastructure would not induce population growth by removal of impediments to growth (e.g., constructing utility infrastructure and service systems in a previously undeveloped region). Further, the Project's infrastructure plan would support the development of the Project and would not accommodate the growth beyond what is proposed. Therefore, given the urbanized nature of the City, the Project would not stimulate substantial unplanned population growth directly or indirectly and impacts related to population growth would be less than significant.

Alternative 3 would include a maximum 1,115 residential units, which is 98 less than the Project. As such, while determined to be a less-than-significant impact under the Project, Alternative 3 would result in slightly lower population growth than the Project. However, because it includes fewer housing units, Alternative 3

would also contribute less to the City's state-mandated RHNA goal than the Project. Alternative 3 would include slightly less commercial square footage as the Project and would therefore provide slightly less than the number of employment opportunities as the Project. Alternative 3 would still lower the job-to-housing ratio within the City because it would provide more housing units than jobs, but to a slightly lower extent than the Project. Alternative 3 would result in less than significant impacts, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to population and housing (induced growth) would be less than significant.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Facts

Under the existing conditions (i.e., as of the date of the Notice of Preparation of this Environmental Impact Report), the Project site consists of the 228-space Mobile Home Park. The Mobile Home Park consists of 225 mobile home coaches, which house residents over the age of 55 years old. The approval of the RIR, resulting in the closure of the Mobile Home Park, is separate from the proposed Project and will displace the existing residents irrespective of the Project. As discussed above, the RIR approval accounts for and requires measures to be taken by the Park Owner to reduce the adverse impacts of the Park closure on the ability of the residents to be displaced to find alternative housing. The displacement of Park residents from the Park is thus the result of closure of the Park pursuant to the RIR approval, which is not a part of the Project. The Park closure will occur irrespective of the Project. Accordingly, the Project will not result in displacement of any residents, and will not necessitate the construction of replacement housing elsewhere.

Although the RIR approval and consequent Park closure process will result in the displacement of all Park residents, it may not result in removal of all mobile homes from the Project site. More specifically, while residents who select Option A will relocate their coaches off-site as a part of the Park closure process, residents who select Options B or C will convey their coaches to the Park Owner, who will then be responsible for the costs and logistics of removing and disposing of the vacant mobile homes. However, the Park Owner will not be required to actually remove the vacant mobile homes as a condition of the RIR approval itself. Rather, the Park Owner would need to remove them prior to commencing a new use of the Project site that would be obstructed by their presence, or to eliminate a nuisance. The same can be said for the mobile home park-specific infrastructure and improvements, which would be left behind following relocation of the Park residents and coaches, including space pads, roads, utility improvements, and related infrastructure. Although this need would arise prior to commencing *any* new use or development that would be obstructed by the presence of the remaining coaches, infrastructure or improvements and is not unique to the Project, in the interest of providing a comprehensive informational document, this Environmental Impact Report analyzes the environmental impacts of removing all mobile homes and mobile home park-specific infrastructure and improvements from the Project site, deeming those impacts less-than-significant.

Although the Project will not displace any residents or necessitate the construction of replacement housing elsewhere, the housing provided by the Project could serve as a source of future housing for the Park residents displaced by the RIR approval/Park closure, in addition to other available housing in the City. As of 2020, the City is estimated to contain 26,451 housing units. Of these total units, mobile homes are estimated to make up 9.3% of this total, at 2,456 units (SCAG 2020b). The estimated vacancy rate within the City is 2.8% (SCAG 2020b). However, due to the City's mobile home space rent control, there are few if any available mobile home spaces in the City; according to the RIR, as of the time of its preparation there were only 13 available vacant spaces within 30 miles of the Mobile Home Park.

The Project would provide an additional 988 dwelling units within the Project site over the existing condition, of which there would be 180 age restricted units for 55-years plus (assuming the maximum built out density). The project would thus make available new housing opportunities to both the current Park residents and the public generally. For current Park residents, this could include: (i) the provision of affordable housing units or market rate units in the Project for residents who select Option B, relocate to other housing, and subsequently qualify for such Project housing and decide to move back; and (ii) the provision of units subsidized to affordable housing rates to provide future housing in compliance with Option C, for residents who select it. As previously described, the proposed Project would construct 1,213 new residential units with 2,026 parking stalls as well as commercial uses and publicly accessible park space, replacing the existing 225 mobile home spaces. As part of the RIR conditions of approval, some of the proposed Project's housing units could be made available for existing Mobile Home Park residents who select Option C (if any), provided the Park Owner uses the Project as opposed to another development or site in the City to fulfill these obligations. The Project has sufficient units to accommodate any and all Park residents who may select Option C, and the Park Owner will be required to use the Project to do so pursuant to the RIR approval unless it is able to satisfy the obligations via another development or site in the City. In addition, through the Project's Development Agreement, the Project will include an affordability community benefit that would require provision of deed restricted affordable units on or off-site.

As stated above, the RIR and Park closure is separate from the Project and resulted in the City filing a Notice of Exemption that was not challenged. As stated above, the RIR and Mobile Home Park closure is separate from the Project and resulted in the City filing a Notice of Exemption that was not challenged. The separate RIR process has concluded, and pursuant to that process, the Park Owner was required by the City Council and Mobile Home Park closure approvals to provide relocation options as well as financial assistance, to reduce adverse impacts associated with the park closure's displacement of existing people or housing. Therefore, no displacement would occur as a result of Project approval. Between the requirements already in place as part of the RIR/Mobile Home Park closure process, the availability of other housing options within the City and the Project's provision of a net increase of 988 dwelling units (including an affordable housing public benefit), construction of replacement housing offsite would not be necessitated by implementation of the proposed Project, and impacts would be less than significant.

Alternative 3 is located on the same site as the Project and would be subject to the same requirements as the Project under the RIR approval related to impacts of the closure on residents of the Park. Alternative 3 would have substantially similar impacts with regard to population and housing to the Project. No mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to population and housing (displacement) would be less than significant.

3.4.15 Public Services

a. ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

Fire protection?

Facts

The addition of residential and commercial uses on the Project site would result in an overall increase in the intensity of use on the site, and thus, could result in increased calls for service to Los Angeles County Fire Department (LACFD). Six primary LACFD fire stations provide fire and emergency medical services to the City, four of which are located within City boundaries. As the closest station the Project site (approximately 1.5 miles southwest via local roads), Station 36 would provide primary response to the Project site in the event of a fire or emergency. In the event that Station 36 could not meet the immediate needs of a call for services independently, or does not have capability to address the full extent of a larger incident, the closest available LACFD resources could respond or provide support.

In a letter submitted in response to the Notice of Preparation for the Project, the LACFD did not indicate if there was a need for an additional fire station to serve the Project area due to the incremental growth in the area. Payment of CFD special taxes annually would allocate funds towards government facilities, such as fire stations. Payment of the City's CFD would help offset incremental impacts to LACFD resources and facilities by helping to fund capital projects, as needed.

Further, the Project would be constructed in compliance with LACFD requirements for building materials, adequate "fire flows" (i.e., water volume and pressure), width of emergency access routes, turning radii, automatic sprinkler systems, fire alarms, and height requirements along emergency access routes. Compliance with the LACFD standards would be ensured through the plan check process and fire review prior to the issuance of building permits for the Project. Additionally, all development within the Project area would be subject to compliance with the existing regulations specified in the California Fire Code, California Building Code, International Fire Code, Carson Municipal Code Chapter 1 (Fire Prevention), the Los Angeles County Fire Code (Title 32 of the County Municipal Code), and specific fire and life safety requirements in effect at the time of the plan check review. The primary access point for the Project would be via a signalized driveway on Avalon Boulevard. Secondary access points would provide additional emergency access options. These entrances would provide access to the residential and commercial uses through internal driveway connections. The width of drive aisles would be designed to meet City standards and LACFD access requirements.

Based on the proximity of the Project site to existing LACFD facilities, and since the Project site is located in a developed part of the City that is already within the service area of LACFD, it is anticipated that the Project could be served by LACFD without substantially affecting existing response times or other performance objectives. Additionally, the aforementioned fire safety features and compliance with fire code standards would reduce the potential demand for fire services by decreasing the likelihood and/or severity of a fire emergency at the Project site, and the payment of Community Facilities District (CFD) fees would help to fund new LACFD capital and labor expenditures. As such, it is not anticipated that the Project would significantly impact LACFD performance objectives to the point that new or expanded facilities would be required. Therefore, impacts related to LACFD facilities would be less than significant.

Alternative 3 would increase the intensity of use at the Project site to a similar, but marginally lower, degree than the Project. As such, impacts related to fire protection would be similar to the Project under Alternative 3 and would remain less than significant.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to public services (fire protection) would be less than significant.

Police protection?

Facts

As with fire protection services, the increased intensity of use on the Project site attributable to the Project would be expected to increase the frequency of emergency and non-emergency calls to the Sheriff's Department. Although it is likely that the Project site currently places some demand on the Sheriff's Department, the Project is expected to increase demand relative to existing conditions.

As previously discussed, the Los Angeles Sheriff's Department (LASD) provides police protection services to the City out of the Carson Sheriff's Station. Based on the number of sworn officers (89) at the Carson Sheriff's Station in 2017, and the 2020 population projections for the City (96,100 people), the current service ratio of the Carson Sheriff's Station is approximately 1 officer per 1,000 residents (City of Carson 2018). As stated in the County General Plan EIR, LASD staff has indicated that an officer-to-population ratio of 1 officer to every 1,000 residents provides the desired level of service for its service area (County of Los Angeles 2014). Under existing conditions, the Carson Sheriff's Station response times generally meet or exceed the LASD response time standards. Since the population growth anticipated to occur as a result of the Project is within the population growth projections for the City, the Project is not anticipated to have a negative impact on service ratios.

Although the Project is not anticipated to adversely impact law enforcement services, there are operational practices and design elements that would be incorporated into the Project to increase safety and reduce the potential for crime to occur, which could lessen the demand for police protection services at the Project site. The Project would be designed to minimize secluded areas and potential hiding places. Signage and lighting would be used to facilitate wayfinding and safe pedestrian movement throughout the site. Lighting levels would vary depending on the specific use and conditions, but the overall consideration would be to provide lighting levels sufficient to provide security and safety. Security cameras would be installed in

commercial areas to monitor the entrances/exits, cash drawer areas, and general interiors of commercial operations, as well as the exteriors and common areas of residential buildings; 24-hour security would be provided on site as a further deterrent to criminal activity. The design and selection of street furniture and common areas would include considerations for the security, safety, comfort, and convenience of the user. These design and operational practices, commonly referred to as Crime Prevention through Environmental Design, would lessen the demand for police protection services at the Project site by reducing the potential for crime to occur.

In addition to these design and operational practices, the Project would be required to pay development impact fees to the City prior to the issuance of building permits. The City's CFD fees would be collected annually to help offset impacts to City resources and facilities Payment of fees per the City's CFD would help offset incremental impacts to resources and facilities by helping to fund capital projects, as needed. As a result, it is not anticipated that the Project would impact police services such that the need for new or physically altered law enforcement facilities would arise as a result of the Project. Therefore, impacts associated with LASD facilities would be less than significant.

Alternative 3 would increase the intensity of use at the Project site to a similar, but marginally lower, degree than the Project. As such, impacts related to police protection would be similar to the Project under Alternative 3 and would remain less than significant.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to public services (police protection) would be less than significant.

Schools?

Facts

The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause new schools to be constructed. The City is served by the Los Angeles Unified School District (LAUSD) and Compton Unified School District, and the assigned resident schools based on the Project location are Bonita Street Elementary (grades K–5), Andrew Carnegie Middle School (grades 6–8), and Carson Senior High School (grades 9–12) (LAUSD 2015, 2019). During the 2019/2020 school year, Bonita Street Elementary had Bonita Street Elementary had 462 students enrolled, Andrew Carnegie Middle School had 729 students enrolled, and Carson Senior High School had 1,496 students enrolled (CDE 2020). These schools have a maximum capacity of 783 students, 2,228 students, and 3,600 students, respectively (City of Carson 2002). Therefore, each of these schools has remaining capacity to accommodate additional students. Further, as previously discussed, the population growth anticipated to occur as a result of the Project is within local and regional growth projections.

Based on the LAUSD's 2020 Developer Fee Justification Study (LAUSD 2020), the anticipated student generation for the proposed 1,033 residential units (reflects units without senior housing) would be a total of 432 students, made up of 235 elementary school students, 63 middle school students, and 134 high school students. Assuming that the students that are added to the City by the Project would attend the

aforementioned resident schools, the number of students anticipated to be generated by the Project would not result in any of the resident schools being over capacity.

Additionally, the LAUSD charges development impact fees on residential and commercial development at a rate of $4.08 per square foot for residential development and $0.66 per square foot of commercial development (LAUSD 2020). These fees are used to offset potential impacts to schools. In addition, the Project would be subject to Senate Bill (SB) 50, which requires the payment of mandatory impact fees to offset any impact to school facilities. In accordance with SB 50, the Project would pay its fair share of school impact fees based on the number of proposed dwelling units and square footage per Government Code Section 65995(h). The use of school impact fees, collected under the provisions of State law, would supply the funding necessary to add classrooms as required, and are deemed to fully mitigate impacts. Therefore, with payment of all applicable impact fees, potential impacts to schools and school facilities as a result of the Project would be less than significant.

Alternative 3 would increase the intensity of use at the Project site to a similar, but marginally lower, degree than the Project. While also not significant for the Project, Alternative 3 would have a slightly lower impact on schools than the Project because it would include fewer residences and therefore fewer school-age children.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to public services (schools would be less than significant.

Parks?

Facts

The City's existing parks include 16 City-operated parks, one County park, one County golf course, and five school recreational spaces with joint use agreements, totaling approximately 343.1 acres of parkland in the City (City of Carson 2018, 2019). The City's General Plan identifies a standard of 4 acres per 1,000 residents (City of Carson 2002). Based on the City's estimated population for 2020 of approximately 93,108 people (as projected by SCAG), the City currently has a parkland ratio of approximately 3.7 park aces per 1,000 residents, inclusive of County-operated parkland and joint-use school facilities. Therefore, the City currently has a parkland deficiency regardless of the Project. To achieve a parkland ratio of 4 acres per 1,000 residents, the City would need to add 36.9 acres of parkland in the City.

In addition to the nearby recreational facilities, Project residents would have access to common open spaces and recreational amenities that would be provided as part of the Project. Notably, the Project would include a 21,300-square-foot publicly accessible, privately maintained park, which would be comprised of walkways, a children's play area, a dog park, and a performance pavilion. The construction of this park would supplement the City's park supply. Additionally, residents of Buildings A, B, and D would each have a swimming pool area and each residential unit would be provided with private open space such as balconies, terraces, and stoops for individual units. Thus, the Project would provide opportunities for passive and active recreation on site. These on-site amenities would provide an alternative to off-site public

parks and recreational facilities, allowing the Project's residents to recreate on the Project site while incrementally reducing potential impacts to off-site public parks and recreational facilities.

Increased demand for neighborhood and regional parks or recreational facilities is most commonly associated with a substantial population increase such that existing parks and recreational amenities would be over-utilized and deteriorate as a result. As discussed in Section 3.5.14, the Project is anticipated to add approximately 2,669 new residents to the City, which represents 23% of the City's projected population growth for 2020 to 2045. Thus, the population growth that is anticipated to occur as a result of the Project is within City and regional growth projections, as projected by SCAG. At least a portion of these residents are anticipated to frequent the various public parks and recreation facilities located in proximity to the Project site. Carson Park and Pool and Perry Street Mini-Park are the closest parks to the Project site, each located approximately 0.8 roadway miles east and west of the Project site, respectively. Carson Park is composed of 11 acres of recreational space, offering amenities such as baseball fields, basketball courts, picnic areas, a swimming pool, a fitness center, a gymnasium, multi-purpose rooms, a splash pad, and open green space. Perry Street Mini-Park is a 1.3-acre facility with a sand play area, play apparatuses, park furniture, and open green space (City of Carson 2021a). Additionally, the Carson Community Center is located approximately 0.4 miles south of the Project site.

In addition to the park space provided by the Project, there are also proposed nearby park-improvement projects. A nearby proposed project includes a park component, consisting of 6.29 acres of passive and active publicly-accessible open space and amenity areas, which would be easily accessible from the Project site via the proposed pedestrian bridge. Although privately owned, this project would provide additional park facilities within the City and would improve existing park facilities.

Although the City is currently experiencing a deficit in the desired parkland ratio, this does not indicate that existing facilities have reached capacity for use, and does not suggest that increased use associated with Project residents and employees would result in substantial physical deterioration of existing facilities. The Project would be subject to the state's Quimby Act, which requires development projects to set aside land, donate conservation easements, or pay in-lieu fees for park improvements. Per Ordinance No. 19-1927, the City's "Quimby Ordinance" was removed from the Carson Municipal Code and replaced by the City's Interim Development Impact Fee (IDIF) Program (Ordinance 19-1931), which collects fees from new development and allocates a portion of the fees collected toward parks. Specifically, as it relates to the proposed elements of the Project, the IDIF Program has a specific amount allocated to parks (City of Carson 2021b). Payment of the City's IDIF would help offset incremental impacts to public parks and recreational facilities by helping to fund the acquisition and construction of new parkland, or maintenance and improvement of existing facilities, as needed.

With payment into the City's IDIF Program, population growth that would occur as a result of the Project is not anticipated to result in the overuse of existing parks such that the need for new or physically altered parks would be necessary. Therefore, impacts associated with park facilities would be less than significant.

Alternative 3 would increase the intensity of use at the Project site to a similar, but marginally lower, degree than the Project. The City currently has a parkland deficiency, independent of implementation of the Project or an Alternative. Alternative 3 would include approximately the same amount of publicly accessible park space as the Project, which would supplement the City's deficiency. Additionally, Alternative 3 would include slightly fewer housing units and therefore fewer residents utilizing City parks, recreational facilities, and

other public facilities than the Project. As such, though determined to be less than significant for the Project, Alternative 3 would have slightly lower impacts on public services, recreational and other public facilities than the Project. No mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to public services (parks) would be less than significant.

Other public facilities?

Facts

Other public facilities in the City include facilities such as public libraries and the Carson Community Center. An increase in demand for both library services and other public facilities is generally associated with additional residential housing. The Project would include 988 new dwelling units, which could result in approximately 2,669 new residents. As previously discussed, the anticipated residential growth associated with the Project is within the projected population for the City and the region.

The Carson Community Center (also known as the Carson Event Center) is located in the Civic Center complex. The Community Center provides recreation programs, meeting rooms, and event space. It is anticipated that payment in the City's IDIF Program would offset any potential impacts to the Carson Community Center, and that the Project would not result in increased use of the center such that new or expanded facilities would be required.

The City is served by the County of Los Angeles Public Library system, and there are two library facilities located in Carson: the Carson Library and the Martin Luther King, Jr. Library. Under existing conditions, the community is underserved in terms of facility size and library materials (City of Carson 2002). The libraries could experience an increase in use due to the anticipated increase of approximately 2,669 residents. However, because the libraries in the City are part of a greater network of other County library services, residents and registered borrowers have access to the County's 7.5 million-volume book collection, as well as magazines, newspapers, government publications, and many specialized materials, including online databases (Los Angeles County Library 2020). The County's library system is made up of 86 libraries available to the public, and the increase in use on any one library is not anticipated to be substantial. Additionally, the County has established library facilities mitigation fee programs (Section 22.246.060 of the Los Angeles County Code) that require residential projects to remit payment pursuant to the County-wide program to account for library-related construction, improvements, and acquisition costs. The Project would be subject to applicable library facilities fees, pursuant to Section 22.246.060 of the Los Angeles County Code. Therefore, potential impacts to library facilities would be offset with payment of any applicable library mitigation fees and impacts to library facilities would be less than significant.

Alternative 3 would increase the intensity of use at the Project site to a similar, but marginally lower, degree than the Project. Therefore, Alternative 3 impacts related to library facilities would be less than significant, less than the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to public services (other public facilities) would be less than significant.

3.4.16 Recreation

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Facts

As discussed above, the Project would provide opportunities for passive or active recreation on site, including common open space such as courtyards and paseos, and common resident amenities such as a swimming pool and dog park. Further, each residential unit would be provided with private open space such as balconies, terraces, and stoops for individual units. Additionally, the proposed pedestrian bridge would provide access to a proposed project north of the Project site, which would include 6.29 acres of publicly accessible open space and amenity areas. Thus, Project residents would have access to common open spaces and recreational amenities that would be provided as part of the Project. These on-site amenities would provide an alternative to off-site public parks and recreational facilities, allowing the Project's residents to recreate on the Project site while incrementally reducing potential impacts to off-site public parks and recreational facilities. Further, the population growth anticipated to occur as a result of the Project is within the population projections for the City. As such, the City's plans for the addition of parks and recreation facilities should be consistent with the demand of an increasing population.

The Project would pay its fair share into the City's IDIF Program (Ordinance 19-1931), which allocates a portion of the fees collected on new development toward parks. Payment of the City's IDIF would help offset incremental impacts to public parks and recreational facilities by helping to fund the acquisition and construction of new parkland, or maintenance and improvement of existing facilities. Despite the existing parkland deficit, according to the City's Existing Conditions Report, the City is currently prioritizing improvements to existing parks over park expansion or the acquisition of new park land (City of Carson 2018).

Through the provision of on-site recreational opportunities and the payment into the City's IDIF program, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts related to the increased use of park and recreational facilities would be less than significant.

Alternative 3 would increase the intensity of use at the Project site to a similar, but marginally lower, degree than the Project. The City currently has a parkland deficiency, independent of implementation of the Project or an Alternative. Alternative 3 would include approximately the same amount of publicly accessible park space as the Project, which would supplement the City's deficiency. Additionally, Alternative 3 would include slightly fewer housing units and therefore fewer residents utilizing City parks, recreational facilities, and other public facilities than the Project. As such, though determined to be less than significant for the Project,

Alternative 3 would have slightly lower impacts on public services, recreational and other public facilities than the Project. No mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to recreation (increased use) would be less than significant.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Facts

The Project would include the construction or expansion of parks and other recreational facilities. The Project would include common spaces and recreational amenities that would be available to residents of the Project site, such as a pool, courtyards, and paseos, as well as private open spaces (e.g., balconies, terraces, and stoops) for individual units. The construction of these recreational facilities has been analyzed throughout this Draft EIR as part of the Project. As such, any potential environmental impacts related to these components, such as those described above, are already accounted for in this Draft EIR as part of the impact assessment conducted for the entirety of the Project. Additionally, the Project would be required to comply with all regulatory requirements and mitigation measures outlined within this Draft EIR for the purposes of lessening or mitigating impacts associated the construction of these recreational facilities. For example, as described in Section 3.5.10, Hydrology and Water Quality, Project construction would occur in accordance with the requirements of the National Pollutant Discharge Elimination System General Construction Permit and the Municipal Code, which require the implementation of best management practices and pollutant control measures to minimize pollutants and reduce runoff to levels that comply with applicable water quality standards. Therefore, no adverse physical effects beyond those already disclosed in this Draft EIR would occur as a result of construction of the Project's proposed recreational facilities. Therefore, impacts associated with the inclusion of park and recreational facilities would be less than significant.

Alternative 3 would increase the intensity of use at the Project site to a similar, but marginally lower, degree than the Project. Like the Project, Alternative 3 would include similar construction of parks and other recreational facilities. Therefore, impacts associated with the inclusion of park and recreational facilities would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to recreation (inclusion of park and recreational facilities) would be less than significant.

3.4.17 Transportation

a. Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Facts

The Project would be consistent with the 2020–2045 RTP/SCS also analyzed in Section 3.5.11, Land Use and Planning. The Project's consistency with the applicable goals and policies of the General Plan Transportation and Infrastructure Element is provided in Section 3.5.11, Land Use and Planning. As determined in these discussions, the Project is consistent with the General Plan Transportation and Infrastructure Element and the Applicable City of Carson General Plan Policies.

Although there is a limited existing bike network there are several bike lanes and bike routes planned throughout the Project as well as the planned District at South Bay development adjacent to the Project site will include a Class II bike lane and a Class I bike path on its internal roadway network. The Project would not conflict with any applicable General Plan and Master Bikeway Plan policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

Alternative 3 would increase the intensity of use at the Project site to a similar, but marginally lower, degree than the Project. As with the Project, Alternative 3 is consistent with the goals of the 2020–2045 RTP/SCS, Master Bikeway Plan and the applicable goals and policies of the General Plan with a General Plan Amendment, including the Transportation and Infrastructure Element. Therefore, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project and cumulative impacts related to transportation (conflict with policy) impacts would be less than significant.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Facts

As shown in the following analysis, the Project is estimated to generate VMT per capita of less than 15% below the citywide average for this metric. All commercial uses included in the Project are each less than 50,000 square feet and therefore identified as local serving and screened from further analysis. The Project would be consistent with CEQA Guidelines Section 15064.3(b) and therefore, impacts would be less than significant.

Vehicle Miles Traveled Screening

VMT is heavily dependent on the land uses and location of a project. Therefore, Governor's Office of Planning and Research (OPR) has provided guidance related to several opportunities for screening projects that would generate low VMT.

Project Type Screening

Projects that generate less than 110 daily trips may be screened from conducting a VMT analysis. Local serving commercial uses less than 50,000 square feet may also be presumed to have a less-than-significant VMT impact. All the Project's commercial uses are less than 50,000 square feet. Therefore, the commercial component of the Project is identified as local serving and screened from VMT analysis.

Low Vehicle Miles Traveled Area Screening

The SCAG Regional Travel Demand Model, which includes Los Angeles County and the City of Carson, is the most appropriate model to use for VMT forecasting within the City. This analysis used the SCAG model to measure the VMT performance for the Project's Traffic Analysis Zone (TAZ) during Base Year 2016 (the most recently adopted SCAG base year) conditions. TAZs are geographic polygons similar to Census block groups used to represent areas of homogenous travel behavior. Figure 4.13-4, 2016 RTP/SCS SCAG Model Tier 2 Transportation Analysis Zones, shows the Project's TAZ. The VMT metrics for the Project's TAZ are discussed in further detail below as part of the screening for residential land uses.

Low VMT areas for residential projects are defined as TAZs that generate VMT on a per capita basis that is at least 15% lower than the citywide average. Low VMT areas for office projects are defined as TAZs that generate VMT on a per employee basis that is at least 15% lower than the citywide average. The Project's TAZ is estimated to generate VMT per capita greater than 15% below the City's baseline VMT. Therefore, the Project is not in an area with low residential VMT, which means the residential component of the Project cannot be screened out of a VMT analysis.

Transit Priority Area Screening

Projects located within one-half mile of either an existing major transit stop[10] or a stop along an existing high-quality transit corridor[11] may also be exempt from VMT analysis. The closest major transit stops to the Project are along the LA Metro Silver Line bus rapid transit route. However, the Project is more than 1 mile away from the closest Silver Line stop at the I-110/Carson Street interchange. Also, there are no high-quality transit corridors near the Project. Therefore, the Project is not within a Transit Priority Area and cannot be screened out of a VMT analysis under this screening threshold.

[10] California Public Resources Code, Section 21064.3 ("'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").

[11] California Public Resources Code, Section 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.").

Vehicle Miles Traveled Analysis and Impact Conclusion

Based on the screening criteria recommended by OPR of local serving retail that is less than 50,000 square feet, only the commercial component (i.e., restaurants and a café) of the Project is exempt from VMT analysis. For projects consisting of residential, office, and commercial land uses, the VMT analysis can be conducted using the SCAG model. The SCAG 2016 Regional Travel Demand Model was used to collect data and perform the VMT analysis for this study. In order to estimate the VMT generated by the Project, the Average Person Trip Rates, the Average Person Trip Rate to Vehicle Trips Conversion, and the Estimated trip length were determined.

The SCAG model was used to estimate average person trip rates for the residential component of the Project. The home-based production person trip rate per resident was determined to be 1.7 for the City using this method, which converted to 3,368 daily residential vehicle trips.[12] The trip lengths for the Project were estimated using data from the SCAG model. The SCAG model can produce average trip lengths for each TAZ in the City. For the TAZ including the Project site, the average trip length for home-based production trips is 9.1 miles.

The final step to calculate VMT is to multiply the number of vehicle trips by the average trip length for those trips. The total VMT for the Project's residential uses is projected to be 30,649. The residential VMT is then divided by the 3,042 total residents to obtain a VMT per capita of 10.1. The 2016 RTP/SCS SCAG model was used to determine an appropriate baseline of VMT for projects in the City of Carson.

Following the standard OPR guidance, a threshold of 15% below baseline VMT is used to determine if the Project will cause significant transportation impacts. If the Project generates VMT higher than this threshold, then it is expected to have a significant impact. If the Project generates VMT lower than this threshold, then it is expected to not have a significant impact. The home-based VMT per capita for the Project (10.1) is 30% below the Citywide average (14.4). Based on the standard OPR thresholds and interim City guidance, the Project is estimated to generate VMT per capita of less than 15% below the citywide average for this metric. All commercial uses included in the Project are each less than 50,000 square feet and therefore identified as local serving. Impacts would be less than significant.

Although the Project would not have a VMT impact, it proposes to implement several strategies that are part of PDF- TRA-1 to encourage the use of active transportation modes, such as walking, biking, carpooling and taking transit. Because the Project's VMT would already be below the 15% threshold, the effect of these PDFs was not quantified in the Project's VMT analysis. Nonetheless, they are part of the Project and will be incorporated into the Project's conditions of approval. Implementation of PDF-TRA-1 would further reduce the already less-than-significant VMT generation of the Project.

[12] The daily residential vehicle trips used in the VMT analysis are lower than the daily residential vehicle trips used for the Project's Local Transportation Assessment and other CEQA impact analyses, such as air quality, greenhouse gas emissions, energy, and noise. The ITE-based daily trip estimates are intended to be conservative to represent a worst-case scenario for assessing potential impacts to air quality, greenhouse gas emissions, energy, and noise. The VMT analysis, which requires running the 2016 RTP/SCS SCAG model, must use the same methodology for deriving Project trip generation as was used to calculate the VMT threshold of significance, which in this case is the citywide average home-based VMT per capita from the 2016 RTP/SCS SCAG model. Therefore, to be consistent with requirements of VMT estimation per OPR recommendations, the VMT analysis for this Project uses the SCAG model derived trip generation.

Alternative 3 would involve similar amount of commercial space and 98 fewer residential units than the Project. Given that commercial space for Alternative 3 would be similar to the Project, the commercial component of Alternative 3 would similarly be screened out of further analysis and impacts are similarly presumed to be less than significant. With regard to the residential component of Alternative 3, the reduction in unit count would result in a corresponding reduction in the number of persons residing on the Project site, as well as a reduction in VMT associated with the removal of trips associated with those residents. Because Alternative 3 would reduce both the total VMT and the residential population, the home-based VMT of Alternative 3 would be substantially similar to the VMT of the Project, and Alternative 3's VMT impacts would similarly be less than significant, although slightly less.

Lastly, Alternative 3 would include the same design features as the Project with respect to reducing VMT (see PDF- TRAF-1, discussed in Chapter 3). PDF-TRAF-1 involves the provision of regularly scheduled shuttle services for senior residents to access shopping and services in the surrounding areas, the unbundling of parking and monthly rent (for the apartment component) to allow for tenants to more consciously weigh the costs and benefits of purchasing additional parking spaces (which incentivizes reducing overall vehicle occupancy), a car sharing program to allow for greater flexibility for residents who do not own a vehicle, and workstation areas to facilitate telecommuting. Taken together, these measures would further reduce Alternative 3's already less-than-significant VMT impacts.

Finding

The City finds based on substantial evidence that project and cumulative impacts related to transportation (VMT) impacts would be less than significant.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Facts

The following discussion describes the potential for increased hazards as a result of geometric design features of the Project, and/or as a result of the addition of Project traffic to adjacent roadway and Caltrans facilities.

Project Site Access

The Project provides a total of four vehicle access points from both Avalon Boulevard (one signalized full access and one right-in-right-out) and Grace Avenue (one stop-controlled) full access and one right turn-in/left-turn out. The full access driveway of Avalon Boulevard/Imperial Avalon intersection would be signalized and the other three access driveways would operate as stop-controlled intersections. The Grace Avenue/213th Street intersection (Intersection #21) would meet the traffic signal warrant threshold during the PM peak hour under the Future Base and Future plus Project conditions. As part of PDF-TRA-2, this intersection would be signalized as part of the Project.

As such, all Project access driveways would be designed per City standards and would not increase hazards due to geometric design features or incompatible uses. All internal roadways would be 26–28 feet in width and designed per City's Public Works Department Engineering Services Standard Drawings and applicable LA County Fire Department standards.

Freeway Safety Impacts

Due to the potential for the proposed Project to add traffic to Caltrans facilities within the study area, the Caltrans freeway off-ramp and on-ramps were analyzed for freeway safety impacts. The off-ramp and on-ramp safety assessment was conducted for four traffic volume scenarios: Existing, Existing plus Project, Future (Year 2027) Base, and Future (Year 2027) plus Project scenarios. The two future scenarios consider additional traffic volume from ambient growth (0.5% linear growth per year) and related projects in the City of Carson and unincorporated Los Angeles County. This analysis utilizes the Highway Capacity Manual, 6th Edition methodology to calculate the 95th percentile queue lengths. Queue lengths were estimated using the Synchro traffic analysis software package. Intersection counts were collected at the ramp locations and signal timing information from Caltrans was used to accurately analyze operations.

At the assessed off-ramp locations, a potentially significant safety impact would occur if the addition of Project vehicle trips would result in an off-ramp queue that extends onto the freeway mainline. An off-ramp queue which extends onto the freeway mainline causes a potential safety concern if a significant speed differential exists between the off-ramp queue vehicles and the freeway mainline vehicles.

For the on-ramp locations, Caltrans has not identified a set of criteria for evaluating potential significant safety impacts. In lieu of such guidance, collision data at these locations from the previous 5 years and turn pocket queue lengths with the addition of Project vehicle trips were summarized. Connections, if any, between the collision data, turn pocket queue lengths and the addition of Project vehicle trips causing potential safety concerns were identified to determine the Project's impact on safety at these intersections. The following discussion details the effect of Project traffic at both off-ramps and on-ramps.

Off-Ramp Locations

Per Caltrans comment letter and proximity of the Project to Caltrans facilities, three freeway off-ramps were evaluated to determine whether the Project would create potentially significant freeway safety impacts. The three freeway off-ramps evaluated are as follows:

- I-405 northbound (NB) off-ramp to Avalon Boulevard
- I-405 southbound off-ramp to Avalon Boulevard
- I-110 NB off-ramp to Figueroa Street

The freeway off-ramp queues do not exceed the storage length in any scenario or time period. Therefore, no significant freeway safety impact was identified at the off-ramp locations with the addition of Project trips.

On-Ramp Locations

The two left-turn pockets evaluated are as follows:

- northbound lane (NBL) turn pocket from Avalon Boulevard to I-405 NB on-ramp
- NBL turn pocket from Figueroa Street to I-110 NB on-ramp

The NBL turn pocket from Avalon Boulevard to I-405 NB on-ramp has a queue exceeding the storage length in both Future Base and Future plus Project scenarios. The NBL turn pocket from Figueroa Street to I-110 NB on-ramp has a queue exceeding the storage length in all four scenarios. While both left-turn pockets

experience queuing issues, these findings suggest the queueing issues would occur even without the addition of Project trips. The addition of Project trips increases the forecast queue by approximately one car length on Avalon Boulevard. The Project trips are not expected to affect the Figueroa Street queue length. To further assess potential safety concerns at the on-ramp locations, collision data was compiled for the previous 5 years utilizing the California Highway Patrol's Statewide Integrated Traffic Records System.

The on-ramp locations where collision data was compiled are as follows:

- NBL turn pocket from Avalon Boulevard to I-405 NB on-ramp
- NB Avalon Boulevard approach to I-405 southbound on-ramp
- NBL turn pocket from Figueroa Street to I-110 NB on-ramp

None of the collisions from the previous 5 years occur at or preceding the two left-turn pockets or the NB Avalon Boulevard approach to the I-405 southbound on-ramp. There is a cluster of collisions which occurred on the I-405 NB on-ramp from Avalon Boulevard; however, based on the location of the collisions these appear to be related to the southbound right channelized merger rather than the NBL turn pocket. Therefore, no significant freeway safety impact was identified at the on-ramp locations with the addition of Project trips.

Therefore, as shown in Project site access and Caltrans Freeway Safety Analysis, the Project would not increase hazards due to a geometric design feature. The Project does not introduce incompatible uses with the surrounding community. Therefore, impacts would be less than significant.

Alternative 3's site access would be similar to the Project, with the only change being the removal of a secondary driveway at the northwest corner of the site along Grace Avenue (see Figure 1, Alternative 3 Site Plan). Further, Alternative 3 would add slightly less traffic to Caltrans facilities, including freeways and freeway on-ramps and off-ramps because Alternative 3 would result in 160 fewer daily trips than the Project, Accordingly, Alternative 3 would result in less than significant impacts, slightly less than the Project.

Finding

The City finds based on substantial evidence that project and cumulative impacts related to transportation (design hazards) impacts would be less than significant.

d. Would the project result in inadequate emergency access?

Facts

The Project provides a total of four vehicle access points from both Avalon Boulevard and Grace Avenue. The location and design of these access points, as well as the on-site internal roadways, would be designed to comply with applicable local requirements related to emergency vehicle access and circulation. The primary driveway onto Avalon Boulevard would be a signalized intersection with both left and right turns available. There would be one right-turn in/out onto Avalon Boulevard at the southeastern corner of the Project site. In addition, there would be a full-access driveway as well as a potential right turn-in/left-turn out along Grace Avenue.

The Los Angeles County Sheriff's Department provides law enforcement services to the City. The Carson branch of the Sheriff's Department is within 0.25 miles of the Project site, to the south along Avalon Boulevard. The Los Angeles County Fire Department provides fire protection services to the City. The nearest fire station is within a 1.5-mile drive of the Project site, to the south on 223rd Street. The Project provides several emergency access points from both Avalon Boulevard and Grace Avenue. Because the Project's access points and driveways would be designed in accordance with applicable Public Works Department Engineering Services Standard Drawings, and have been reviewed and accepted by the Los Angeles County Fire Department, the Project site would be accessible to emergency responders during construction and operation of the Project. Therefore, impacts associated inadequate emergency access would be less than significant.

Alternative 3's site access and emergency access would be similar to the Project, with the only change being the removal of a secondary driveway at the northwest corner of the site along Grace Avenue (see Figure 1, Alternative 3 Site Plan). Alternative 3's access points and driveways would, like the Project, be designed in accordance with applicable Public Works Department Engineering Services Standard Drawings, and have been reviewed and accepted by the Los Angeles County Fire Department. Further, Alternative 3 would add less slightly less traffic to Caltrans facilities, including freeways and freeway on-ramps and off-ramps because Alternative 3 would result in 160 fewer daily trips than the Project, Accordingly, Alternative 3 would result in less than significant impacts, slightly less than the Project.

Finding

The City finds based on substantial evidence that project and cumulative impacts related to transportation (emergency access) impacts would be less than significant.

3.4.18 Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Facts

No previously recorded archaeological resources of Native American origin or TCRs listed in the CRHR or a local register were identified within the Project site through the SCCIC records or Native American coordination. Further, no TCRs have been identified by California Native American tribes as part of the City's AB 52 and SB 18 notification and consultation process. Therefore, impacts associated with resources identified in the CRHR or defined in PRC 5020.1(k) would be less than significant.

Alternative 3 is located on the same site as the Project within the same footprint with reduced intensity. Therefore, Alternative 3's impacts associated with resources identified in the CRHR or defined in PRC 5020.1(k) would be less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative tribal cultural resources (identified in the CRHR or defined in PRC 5020.1(k)) impacts would be less than significant.

b. ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Facts

The NAHC provided the City with a list of five Native American tribes and/or individuals who may have knowledge of cultural resources in the Project site. On December 31, 2019, the City mailed certified notification letters to all five contacts provided as part of the City's AB 52 and SB 18 notification and consultation process. To date, one response was received from Andrew Salas, Chairperson of the Gabrieleño Band of Mission Indians – Kizh Nation and government-to-government consultation with the Gabrieleño Band of Mission Indians – Kizh Nation was conducted on March 19, 2020. The Gabrieleño Band of Mission Indians – Kizh Nation provided maps on April 20, 2020, and noted that a village site was located in the vicinity of the Project site, though none were identified within the Project site itself. Additionally, on April 20, 2020, the Gabrieleño Band of Mission Indians – Kizh Nation provided the City their recommended mitigation measures and conditions of approval for the Project.

Despite the disturbed nature of the Project site and the fact that the archaeological sensitivity of the Project site is considered to be very low, the City is committed to preserving the integrity of cultural resources. Thus, in response to the requests by the Gabrieleño Band of Mission Indians – Kizh Nation, MM-TCR-1 is required to ensure that a Native American Monitor approved by the Gabrieleno Band of Mission Indians-Kizh Nation is able to observe subsurface construction activities and to ensure that if any potential tribal cultural resources are encountered, a qualified archaeologist and a representative from the Gabrieleno Band of Mission Indians-Kizh Nation shall be able to evaluate the find. Therefore, protocols for the inadvertent discovery of TCRs are included as MM-TCR-1, which would reduce the Project's potentially significant impacts to TCRs. Therefore, with the implementation of MM-TCR-1, impacts associated with TCRs would be less than significant.

Alternative 3 includes similar ground disturbance on the same site as the Project, including excavation up to 45 feet below ground surface and into native soils. Excavation at such levels would be required for almost any redevelopment of the site because the existing subsurface of the site is not suitable to support structures as-is and requires excavation and recompaction. As such, impacts related to tribal cultural resources under Alternative 3 would be similar to those under the Project. The Project includes MM-TCR-1 to address potential impacts to tribal cultural resources by way of monitoring during ground disturbing activities, which would also be applicable to

Alternative 3. As with the Project, with adherence to MM-TCR-1, Alternative 3's impacts would be less than significant. No additional mitigation would be required.

Finding

In accordance with CEQA Guidelines Section 15091(a)(1) and Public Resources Code Section 21081(a)(1), the City finds that with implementation of Mitigation Measure TCR-1 changes or alterations have been required in, or incorporated into, the project would avoid or substantially lessen the significant environmental effect with regard to tribal cultural resources as identified in the Final EIR. Thus, after implementation of Mitigation Measure TCR-1, impacts to tribal cultural resources would be less than significant.

3.4.19 Utilities and Service Systems

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Facts

Water Facilities

The proposed Project would involve the construction of water distribution infrastructure (e.g., pipes, valves, meters) to provide domestic water, firewater, and irrigation water to serve the new buildings and facilities within the Project site. The on-site facilities would be connected to off-site water lines in the adjacent rights-of-way. For water service, the proposed Project would connect to existing lines within Avalon Boulevard and Grace Avenue. The on-site facilities and installation/construction of tie-ins are considered part of the proposed Project. All construction work within the City public right-of-way would be subject to City municipal code requirements. Other than the lateral connections from the Project site to existing water mains, the proposed Project is not expected to require or result in construction or expansion of off-site infrastructure.

Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor offsite work associated with connections to the public water mains. In addition, and consistent with Section 3.5.10, Hydrology and Water Quality, standard best management practices, installed as part of an NPDES-mandated stormwater pollution prevention plan, would reduce potential water quality impacts associated with the referenced water facility connections to less-than-significant levels. As such, the proposed Project would not result in the expansion or construction, expansion, or relocation of off-site water infrastructure, and it is unlikely that there would be any significant environmental effects related to the construction of water infrastructure within the Project site. As a result, impacts would be less than significant.

Wastewater Conveyance and Treatment Facilities

The Project will require construction of new wastewater infrastructure within the Project site to serve the buildings and facilities of the proposed Project. Construction impacts within the Project site associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main.

The Project site would be served by existing sewer mains present on the east and west sides of Avalon Boulevard, as well as a trunk sewer within Grace Avenue. The existing sewer main within Avalon Boulevard is 8-inches in diameter and connects to a 15-inch trunk sewer in 213th Street, and the trunk sewer within Grace Avenue is 12-inches in diameter. As discussed in the Sewer Study, at final buildout, it is anticipated that sewer flows from the Project site would be split between the two sewer lines adjacent to the site. The Project would send 37% of the wastewater flows to the 12-inch sewer main within Grace Avenue, and would send 63% of the wastewater flows to the 8-inch sewer main in Avalon Boulevard.

The Project's total proposed peak flow will discharge approximately 696,430 gallons per day (gpd) into the sewer system. With the proposed split percentages noted previously, the proposed peak flow from the Project would be 256,300 gpd to the 12-inch trunk sewer line in Grace Avenue and 440,130 gpd to the 8-inch sewer main in Avalon Boulevard. In order for the 63% of the Project's proposed sewer discharge to be directed to the 8-inch sewer main in Avalon Boulevard, the 8-inch sewer main must be upgraded from 8-inch to 12-inch diameter pipe for approximately 350 feet and included as part of the proposed Project. Thus, while in the current condition, the sewer main within Avalon Boulevard that the Project would not have adequate capacity to handle the wastewater flows generated by the Project, upgrading the pipeline for a 350-foot length would meet Project demands. Upgrading the pipeline would be conducted in accordance with City municipal code requirements and NPDES Construction General Permit requirements such that impacts related to the upgrade would be minimized. Therefore, in relation to wastewater conveyance systems, the Project would result in a less-than-significant impact.

The average wastewater expected to be generated by the proposed Project is approximately 0.696 million gallons per day (mgd). Off site, wastewater would be conveyed through municipal sewage infrastructure to the LACSD's Joint Water Pollution Control Plant (JWPCP), which has an approximate treatment capacity of 400 mgd and, as of 2019, is estimated to produce an average flow of 260 mgd, or approximately 65% of its total capacity (LACSD 2021). Projected wastewater from the Project would represent approximately 0.05% of the remaining capacity of the treatment facility. As such, since the Project would not exceed the available treatment capacity of the JWPCP and outside of the aforementioned upgrading of the existing 8-inch sewer line to a 12-inch line, it would not require the construction of any other additional wastewater treatment infrastructure. Impacts related to wastewater treatment facilities would be less than significant.

Stormwater Drainage Facilities

The Project site and surrounding area are characterized as an urban, developed commercial and residential area with limited pervious surfaces. Planters with ornamental trees, shrubs, and grasses are scattered sparsely throughout the Project site. The predominance of impervious surfaces prevents water from percolating into the ground, increasing the amount of runoff reaching the storm drain infrastructure. In

addition, as discussed in Section 3.5.10, Hydrology and Water Quality, stormwater infiltration would not be utilized as a low impact development feature as a part of the proposed Project, as the site is underlain by clay-rich soils and shallow groundwater, which are not conducive to infiltration.

The Project-specific Water Resources Technical Report includes an existing and proposed condition hydrologic analysis to determine whether the post-construction runoff would have any impact on the receiving storm drain system. The Project site is currently 99% impervious with all stormwater runoff directed to existing drainage infrastructure. The proposed Project would reduce the impervious surface area within the Project site to 75.6% once all of the Project improvements, landscaping, and amenities are installed. The Project would include the installation of building roof drain downspouts, area drain, and planter drains to collect roof and site runoff. According to the hydraulic report, based on the volumetric flow rate analysis, a comparison of the pre- and post-Project peak flow rate indicated that there would be a decrease in stormwater runoff. Therefore, the proposed Project would not create or contribute runoff water, which would exceed the capacity of existing stormwater drainage systems.

As a result, the Project would not result in the expansion of any existing off-site facilities or in the construction or relocation of new off-site facilities. The proposed stormwater flows would be reduced from existing conditions and would drain into the existing 75-inch storm drain line that runs through the middle of the Project site. Upon compliance with the applicable regulatory requirements, impacts associated with the construction of any new stormwater drainage facilities would be less than significant.

Electric Power, Natural Gas, and Telecommunication

Connections upgrades would be required with respect to electric power, natural gas, and telecommunication facilities (i.e., cable television services), based on the change in land use (i.e., greater intensification). These utilities would be part of a dry utility package that would be installed on site and in the adjacent public roadways to provide service to the Project. Upgrades would be confined to the connections to the Project site and not any off-site centralized facilities. The existing infrastructure is located directly adjacent to the Project site within the public streets. Connection to these existing utilities would require limited construction, which would be temporary and limited to trenching, to the depth of the underground lines. Project construction would occur in accordance with all applicable regulatory requirements. As a result, impacts associated with upgrades of electric, natural gas, and telecommunication lateral connections to the Project site would be less than significant.

Like the Project, Alternative 3 would include construction of water distribution infrastructure, wastewater infrastructure, electric power, natural gas, and telecommunications infrastructure and would likely not require the expansion of stormwater infrastructure. Connections to existing infrastructure would be similar to the Project. Because Alternative 3 includes slightly fewer residential units that the Project, demand for and utilization of utilities, although found to be less than significant for the Project, would be slightly lower under Alternative 3 than the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to utilities and service systems (expansion of current or construction of new utilities systems and/or facilities) would be less than significant.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Facts

Water supply in the City is served by Cal Water Dominguez District, which is located in the southern portion of the Los Angeles coastal plain, in an area known as the "South Bay." The district's 35-square-mile service area, located approximately 5–10 miles inland from the Los Angeles Harbor, includes the Project site. Cal Water Dominguez District receives water from three sources: Cal Water's domestic water supply, purchased imported water, and groundwater. In 2020, Cal Water supplied 14% of its water supply from recycled water, 72% from purchased water and 13% from local groundwater supplies. Cal Water's groundwater supplies are sourced from two adjudicated groundwater basins: the West Coast Basin, and the Central Basin.

Future development under the proposed Project would consist of the construction of 1,213 dwelling units and 10,352 square feet of commercial/food service uses.

According to the Utilities report, the proposed Project is estimated to result in a total water demand of 134,804 gpd, which is equivalent to 151 AFY.

As previously discussed, Cal Water Dominguez generally plans to source 10%–20% of its water supply from groundwater. If previous water trends continue, between 15.1 AFY and 30.2 AFY of the Project's net water demand would be derived from groundwater. This value would represent a marginal increase of approximately 0.09% to 0.18% of Cal Water's allowable pumping allocation of 16,897 AFY from both the Central and West Coast Basins.

The 2020 Cal water Dominguez District UWMP has planned for growth within the Dominguez service area over the next 25 years. Cal Water has made an allowance for future demand estimates based on historical growth rates in the service area. Based on these projections, Cal Water has adequately made allowance for water supply–demand increases for both domestic and commercial water supply, including groundwater, over the next 25 years. According to Table 4.3, Total Gross Water Use (Potable and Non-Potable), of the Cal Water Dominguez 2020 UWMP, Cal Water projects an increase in water demand of 118 AFY between 2020 (32,968 AFY) and 2045 (33,086 AFY) (Cal Water 2021). This projected increase was revised over the 2015 UWMP due to accounting for anticipated reductions in water use from ongoing changes in appliance standards and plumbing codes, conservation programs, and growth in water service costs. While the proposed Project was not specifically included as part of the UWMP, the demand projections for the district do account for growth over the planning horizon and Cal Water has determined that the proposed Project's demand is within the anticipated growth for their service area and the 2020 UWMP demand projections.

Furthermore, as long-term water supply is a significant concern in California, Cal Water Dominguez District can increase supply to meet future demands increasing production of groundwater based off safe yield allocation and utilization of water in storage, increasing imported water purchases, if available and there is sufficient storage capacity, and by purchasing additional recycled water, if available. Collectively, these additional options would enable water supply to meet or exceed water demand for Cal Water Dominguez District for now and into the future. These findings were also made in a Water Supply Assessment prepared for the Project and approved by the Cal Water Dominguez District staff.[13] As a result, the Project would result in less-than-significant impacts related to the water supply.

Alternative 3's potable water demands during operation would also be slightly reduced under Alternative 3 due to the slightly reduced density and commercial area. Impacts would remain less than significant and no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to utilities and service systems (water supply) would be less than significant.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Facts

Off-site wastewater would be conveyed through municipal sewage infrastructure to the LACSD's JWPCP, which has an approximate treatment capacity of 400 mgd and, as of 2019, had an estimated average flow of 260 mgd, or approximately 65% of its total capacity (LACSD 2021). Projected wastewater from the Project would represent approximately 0.689 mgd or 0.05% of the remaining capacity of the treatment facility. As such, since the Project would not exceed the available treatment capacity of the JWPCP or existing sewer lines with the upsizing of the 8-inch Department of Public Works line within Avalon Boulevard to a 12-inch line for approximately 350 feet, it would not require the construction of additional wastewater treatment infrastructure. Impacts related to wastewater treatment facilities would be less than significant.

In addition, the Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' sewerage system for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the sewerage system to accommodate the proposed Project. Furthermore, water conservation measures as established by the City's General Plan (e.g., xeriscaping, improved irrigation systems, public education about conservation, etc.) would be implemented and would help reduce the amount of wastewater generated by the Project. Therefore, Project impacts would be less than significant.

[13] On October 27, 2021, the California Water Service Company Board of Directors adopted a resolution delegating its authority to approve water supply assessments and related documents, as required under California Water Code Sections 10910–10912, to any officer of California Water Service Company.

Alternative 3's wastewater treatment demands during operation would also be slightly reduced under Alternative 3 due to the slightly reduced density and commercial area. Impacts would remain less than significant and no mitigation would be required.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to utilities and service systems (wastewater) would be less than significant.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Facts

Construction

Less-than-Significant Impact. Construction of the proposed Project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, plastics, and soils. Any hazardous wastes that are generated during demolition and construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws. Per CALGreen requirements, 65% of construction and demolition waste must be diverted from landfills. As such, at least 65% of all construction and demolition debris from the site would be diverted. The County also has construction and demolition debris diversion requirements; however, the CALGreen standards require an equivalent level of diversion (65% diversion). The remaining 35% of construction and demolition material that is not required to be recycled would either be disposed of or voluntarily recycled at a solid waste facility with available capacity. The inert landfill in the County (Azusa Land Reclamation landfill) has a remaining capacity of 51,512,201 tons and is expected to remain open until 2045 (CalRecycle 2021a).

Other facilities that process inert waste and other construction and demolition waste in the County have a collective maximum daily capacity of 35,541 tons (Los Angeles County Public Works 2020). In addition, numerous processing facilities for construction and demolition wastes are located throughout the County, the nearest of which is Falcon Refuse Center Inc., located at 3031 East I Street, in Wilmington. This facility is 4.2 miles southeast of the Project site, has a permitted capacity of 1,850 tons of waste per day, and has a recycling rate of 82%. As such, any construction and demolition debris requiring disposal at an inert waste landfill would be sufficiently accommodated by existing landfills or recycling facilities.

For the reasons previously stated, Project demolition and construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (e.g., CALGreen standards). Impacts would be less than significant.

Operations

Less-than-Significant Impact. Once operational, the proposed Project would produce solid waste on a regular basis, in association with operation and maintenance activities. The solid waste generation rates assume compliance with AB 341.

The City's commercial uses are currently served by Waste Management for solid waste collection and disposal. Waste is primarily hauled to El Sobrante Landfill and the Lancaster Landfill. El Sobrante Landfill has a remaining capacity of 143,977,170 tons and is expected to remain open until 2051 (CalRecycle 2021b). The net solid waste that is anticipated to be produced by the proposed Project would equate to approximately 0.0002% of the available capacity of the El Sobrante Landfill through its estimated closure date. The Lancaster Landfill, which has a remaining capacity of 14,514,648 tons, is expected to remain open until 2044 (CalRecycle 2021c). The anticipated solid waste to be produced by the Project would equate to approximately 0.002% of the available capacity through this landfill's closure date.

Once the El Sobrante Landfill and Lancaster Landfill reach capacity, additional landfills and strategies would be identified so that disposal needs continue to be met. Further, according to the latest annual report for the Countywide Integrated Waste Management Plan, there are landfills used by the County with up to 109 years of remaining life. For example, the Prima Deshecha Sanitary Landfill in Orange County is expected to remain open for another 83 years, the Mesquite Regional Landfill in Imperial County is expected to remain open for another 109 years, and the Simi Valley Landfill in Ventura County is expected to remain open for another 109 years (Los Angeles County Public Works 2020). As such, in the event of closure of the El Sobrante and Lancaster landfills, other landfills in the region would be able to accommodate solid waste from the proposed Project, and regional planning efforts would ensure continued landfill capacity into the foreseeable future.

For the reasons described above, Project operations would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

Generation of solid waste construction debris would be similar to the Project. As such, construction impacts related to utilities and service systems would remain less than significant under Alternative 3. Because Alternative 3 includes slightly fewer residential units that the Project, demand for and utilization of utilities, although found to be less than significant for the Project, would be slightly lower under Alternative 3 than the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to utilities and service systems (solid waste generation) would be less than significant.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Facts

Solid waste from commercial uses in the City are brought to the Waste Management transfer station in Carson. From there, the waste is primarily taken to the El Sobrante Landfill or the Lancaster Landfill. These facilities are regulated under federal, state, and local laws. Additionally, the City is required to comply with the solid waste reduction and diversion requirements set forth in AB 939, AB 341, AB 1327, and AB 1826. Per AB 341, businesses that generate 4 cubic yards or more of commercial solid waste per week are required to arrange for organic waste recycling services.

In addition, as previously described, waste diversion and reduction during Project construction and operations would be completed in accordance with CALGreen standards and City diversion standards. As a result, the proposed Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts are considered less than significant.

Alternative 3 is located on the same site as the Project and would be subject to the same CALGreen standards and City diversion standards. Alternative 3's waste will be treated in the same manner and taken to the same landfills as the Project. Therefore, Alternative 3's impacts would remain less than significant, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative impacts to utilities and service systems (solid waste management, reduction statues and regulation) would be less than significant.

3.4.20 Wildfire

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Facts

Based on the California Department of Forestry and Fire Protection's Fire Hazard Severity Zones maps, the entire City, including the Project site, is not located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones (CAL FIRE 2020). Therefore, impacts associated with wildfire would not occur.

Alternative 3 is located on the same site as the Project and involves the same uses. Like the Project, Alternative 3 is not located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones. Therefore, there would be no impact related to wildland fires, like the Project.

Finding

The City finds based on substantial evidence that project-level and cumulative wildfire impacts would not occur.

3.4.21 Significant Irreversible Environmental Changes

Facts

The CEQA Guidelines (14 CCR 15000 et seq.) require an EIR to address any significant irreversible environmental changes that would result from the Project should it be implemented. Pursuant to Section 15126.2(d), an impact would fall into this category if (14 CCR 15126.2[d]):

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
- The project involves uses in which irreversible damage from environmental accidents could result;
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the Project may result in significant and irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them.

Alternative 3 is located on the same site as the Project and involves the same uses just at a slightly lesser intensity. Accordingly, the following analysis for the Project summarized below also applies to Alternative 3, except in some instances Alternative 3 would result in slightly lesser impacts.

Change in Land Use that Commits Future Generations to Similar Uses

The Project site is currently developed with the 228-space, Imperial Avalon Mobile Estates mobile home park (Mobile Home Park). The existing General Plan designation for the Project site is Regional Commercial (east) and Low Density Residential (west), and the existing zoning for the Project site is Commercial, Automotive (east) and RM-8-D zone (west). The Project site is surrounded on all sides by developed properties. Immediately north of the Project site is a concrete-lined channel. The area north of the channel is the District Specific Plan Area. The land uses to the east of South Avalon Boulevard includes an auto dealership site. The parcel located adjacent to the southern boundary of the Project site is occupied by an auto dealership use, and single- and multi-family residential uses. The land uses to the west of Grace Avenue are single-family residential uses. Since the Project site is located near and adjacent to existing residential, commercial, and similar urbanized uses, the Project would not result in land use changes that would commit future generations to uses that are not already prevalent in the Project area. The Project's proposed land use mix—residential, commercial, and recreational—already occur in the immediate and broader Project area, and thus, implementation would not commit future generations to similar uses, given that this proposed land use mix is already found throughout the City.

Alternative 3 is located on the same site as the Project and involves the same uses just at a slightly lesser intensity. Thus, implementation of Alternative 3 would not commit future generations to similar uses, given that this proposed land use mix is already found throughout the City.

Irreversible Damage from Environmental Accidents

Potential environmental accidents of concern include those events that would adversely affect the environment or public due to the type or quantity of materials released and the receptors exposed to that release. Demolition and construction activities associated with the Project would involve some risk of environmental accidents. However, these activities would be conducted in accordance with all applicable federal, state, and local regulations, and would follow professional industry standards for safety. Once operational, any materials associated with environmental accidents would comply with applicable federal, state, and local regulations. Use of any such materials would not adversely affect the environment or public due to the type or quantity of materials released and the receptors exposed to that release.

Alternative 3 is located on the same site as the Project and involves the same uses just at a slightly lesser intensity. Construction and operations associated with Alternative 3 would be conducted in accordance with all applicable federal, state, and local regulations, and would follow professional industry standards for safety. Therefore, Alternative 3 would not adversely affect the environment or public due to the type or quantity of materials released and the receptors exposed to that release.

Commitment of Nonrenewable Resources/Consumption of Resources Justified

Commitment of nonrenewable resources includes issues related to increased energy consumption, loss of agricultural lands, and lost access to mining reserves. There would be an irretrievable commitment of labor, capital, and materials used during construction and operation of the Project. Nonrenewable resources would primarily be committed in the form of fossil fuels such as fuel, oil, natural gas, and gasoline used by equipment associated with construction of the Project. Consumption of other non-renewable or slowly renewable resources would also occur. These resources would include lumber and other forest products, sand and gravel, asphalt, and metals such as steel, copper, and lead.

To ensure that energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (Public Resources Code Section 21100[b][3]). Energy conservation implies that a project's cost-effectiveness be reviewed not only in dollars but also in terms of energy requirements. For many projects, cost-effectiveness may be determined more by energy efficiency than by initial dollar costs. A lead agency may consider the extent to which an energy source serving the project has already undergone environmental review that adequately analyzed and mitigated the effects of energy production.

Consistent with both Public Resources Code Section 21100(b)(3), Appendices F and G of the CEQA Guidelines, and a ruling set forth by the court in *California Clean Energy Committee v. City of Woodland*, potentially significant energy implications of a project must be considered in an EIR to the extent relevant and applicable to the project. Accordingly, based on the energy consumption thresholds set forth in Appendix G of the CEQA Guidelines, the Project's estimated energy demands (both short-term construction and long-term operational demands) were evaluated (see Section 3.5.6, Energy). The overall purpose of the energy analysis was to evaluate whether the Project would result in the wasteful, inefficient, or unnecessary consumption of energy.

As further assessed in the energy analysis, for new development such as that proposed by the Project, compliance with California Title 24 energy efficiency requirements is considered demonstrable evidence of efficient use of energy. The Project would provide for and promote energy efficiencies beyond those required under other applicable federal and state standards and regulations, and in so doing would meet or exceed all Title 24 standards. Additionally, energy consumed by the Project would be comparable to, or potentially less than, energy consumed by other mix-use residential/commercial projects of similar scale and intensity. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy.

In addition to the above considerations, state and local laws and regulations would further reduce the Project's use of nonrenewable resources over time. Specifically, electricity consumed at the Project site would be increasingly sourced from renewable energy, pursuant to Senate Bill 100. Senate Bill 100, which passed in 2018, states that 44% of the total electricity sold to retail customers in California per year must be secured from qualifying renewable energy sources by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. Senate Bill 100 also sets forth a state policy that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California and requires that achieving 100% zero-carbon electricity does not increase carbon emissions elsewhere in the western grid or is not fulfilled through resource shuffling. As such, the Project's consumption of nonrenewable energy is anticipated to significantly decrease over time, as Senate Bill 100 is implemented statewide and overall nonrenewable energy consumption decreases.

Similarly, the vehicles that would travel to and from the Project would be subject to increasingly stringent emissions standards over time, which would reduce the amount of fossil fuel consumed per vehicle (see Section 3.5.7, Geology and Soils, for additional details). Furthermore, the state has policies in place to support decreased use of personal vehicles, to be replaced with alternative modes such as transit, walking, and biking. These policies are incentivized at the local level by the proposed Project's provision of alternative transportation amenities (e.g. pedestrian pathways and bicycle parking). As such policies are carried out, the number of vehicles traveling to and from the site may decrease over time.

The Project would be subject to compliance with the California Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen). In conclusion, while the proposed Project would result in the use of nonrenewable resources, such use would be limited primarily to building materials, fossil fuels, and water. During operation, use of such resources is expected to decrease, as increasingly stringent efficiency requirements are implemented at the local and state level.

While the Project would result in increased resource consumption during construction and operation, the Project would also result in some benefits related to long-term resource consumption in the region. As demonstrated in Section 3.5.14, Population and Housing, of this EIR, growth in population, housing, and employment is expected to occur in the City, in the County, and throughout the southern California region into the foreseeable future. The proposed Project falls well within regional growth projections for population and housing and would locate this growth on an infill site within walking distance of a wide range of services, employment opportunities, commercial uses, and existing residential neighborhoods. Regarding population growth, SCAG estimates that the County would have 10,407,000 residents by 2020, 11,174,000 residents by 2035, and 11,674,000 residents by 2045 (SCAG 2020a). The Project's increase in population would provide a nominal amount of population growth of the County's estimated projections through 2045. Additionally, the proposed Project's population growth would represent nominal percentage of SCAG's projected 1,267,000 new residents anticipated in the County between 2020 and 2045. Additionally, the

Project would provide additional housing in an employment-rich urban center, thereby lowering the City's job-to-housing ratio to meet the projected value and provide greater housing opportunities for existing employees within the City.

The Project would help accommodate growth within existing developed areas, as opposed to accommodating growth through development in previously undeveloped areas. The latter development pattern generally results in permanent loss of naturalized lands and open space, as well as increased fossil fuel consumption attributable to longer commuting distances and lack of transit options. While the Project would result in some irretrievable commitment of nonrenewable resources, it would also help accommodate growth in a manner that would reduce irreversible environmental changes in the region. Furthermore, the irretrievable commitment of resources attributable to the Project would not be considered unusual when compared to typical urban infill development of the same size and scope. For these reasons, the irretrievable commitment of resources attributable to the Project would not be considered significant.

Alternative 3 is located on the same site as the Project and involves the same uses just at a slightly lesser intensity. Accordingly, Alternative 3's estimated long-term operational energy demands would be less than the Project's although the short-term construction energy demands would be similar to the Project's. Alternative 3 would also meet or exceed all Title 24 energy efficiency standards, and would fall well within regional growth projections for population and housing on an infill site within walking distance of a wide range of services, employment opportunities, commercial uses, and existing residential neighborhoods. Alternative 3, like the Project, would provide additional housing in an employment-rich urban center, thereby lowering the City's job-to-housing ratio to meet the projected value and provide greater housing opportunities for existing employees within the City. For these reasons, the irretrievable commitment of resources attributable to Alternative 3 would not be considered significant.

Finding

The City finds based on substantial evidence that although irreversible environmental changes would result from the Project, such changes would be less than significant.

3.4.22 Growth Inducing Impacts/Other CEQA Considerations

As stated in Section 15126.2(e) of the CEQA Guidelines, an EIR is required to include a discussion of a project's growth-inducing effects. The CEQA Guidelines generally describes such effects as follows: (1) economic growth, population growth, or additional housing in the surrounding environment; (2) removal of obstacles to population growth (e.g., a major expansion of a wastewater treatment facility that allows for more construction in the service area); (3) increases in population that tax existing services requiring construction of new facilities that could cause significant environmental effects; and (4) characteristics of a project that would encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. These four factors are discussed below as they pertain to the Project. Because Alternative 3 is located on the same site as the Project and involves the same uses just at a lesser intensity. The following analysis also applies to Alternative 3.

(1) As explained throughout this EIR, the Project would increase land use intensity on the Project site and would result in an additional 988 net new housing units and 10,352 square feet of commercial space, the provision of which would directly increase City residents and employment opportunities. As such, the Project

would directly cause population growth, housing growth, and economic growth on the Project site and in the City in general. As explained in Section 3.5.14 (Population and Housing), the City's population was projected to increase from 93,600 persons in 2016 to 105,200 persons in 2045, an increase of 11,600 persons. The Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) "Connect SoCal Plan" estimates that the SCAG region's population is anticipated to increase from 18,832,000 persons in 2016 to 22,504,000 persons in 2045, an increase in 3,672,000 persons (SCAG 2020a).

Once operational, the proposed 1,213 units associated with the Project would generate approximately 3,043 residents, with 2,669 residents assumed to be new to the City. The Project would also add approximately 24 new employees (further discussed herein), but these employees are expected to be current residents of the City. The population growth anticipated to occur as a result of the Project (2,669 persons) represents 23% of the City's projected population growth for 2016 to 2045, and 0.09% of the SCAG region's projected population growth in the same time period. Therefore, the Project would not exceed the projected growth for the City between 2016 and 2045. In addition, the Project's 1,213 residential units would contribute to the City's Housing Element objectives and policies as well as the state-mandated Regional Housing Needs Assessment goals. Based on SCAG's growth projections for housing, the number of households in the City is anticipated to increase from 25,500 households in 2016 to 30,700 households in 2045, an increase of 5,200 households. The number of households in the SCAG region is anticipated to increase from 6,012,000 in 2016 to 7,633,000 in 2045, an increase of 1,621,000 households. The Project's net new 988 dwelling units would represent 19% of the 5,200 households projected to be added to the City between 2016 and 2045, and 0.07% of the SCAG region's projected increase in housing from 2016 to 2045.

With regards to the new employment opportunities created by the Project, the projected number of jobs in the City is anticipated to increase from 63,400 in 2016 to 70,000 in 2045, for an increase of 6,600 jobs. As previously discussed, the Project would generate approximately 24 new employment opportunities. Based on SCAG's projected employment growth, the Project's anticipated 24 employees would represent approximately 0.36% of the 6,600 jobs that are expected to be added in the City between 2020 and 2045. The number of jobs in the SCAG region is anticipated to increase from 8,389,000 in 2016 to 10,049,000 in 2045, an increase of 1,660,000 jobs. The 24 jobs that would be added to the region as part of the Project would represent 0.0014% of the anticipated increase in jobs in the SCAG region. Additionally, the Project would generate part-time and full-time jobs associated with the construction of the Project between the start and end of construction. Construction of the Project is anticipated to occur over a period of approximately 5 years. However, given the relatively temporary nature of the construction period, the demand for construction employment would likely be met within the existing and future labor market in the City and in Los Angeles County. If construction workers reside outside of the City, these workers would likely commute to the Project site during the temporary construction period. The construction employment generated by the Project is not expected to increase the residential population of the City and would not induce growth in the City or region.

Due to the mixed-use nature of the Project, the Project would not cause an imbalance among jobs, housing, and population. Additionally, due to the City being considered a "jobs rich" area, additional housing would improve the jobs-to-housing ratio. As such, while the Project would result in some growth, this growth would be minor and is not expected to foster the construction of additional housing or other types of growth in the surrounding environment. Because Alternative 3 proposes the same uses on the same site as the Project

with a slightly less intensity, its growth would also be minor and would not be expected to foster the construction of additional housing or other types of growth in the surrounding environment.

(2) The Project would not remove obstacles to population growth. Projects that physically remove obstacles to growth, or projects that indirectly induce growth, are those that may provide a catalyst for future unrelated development in the area. The Project would not require the expansion of domestic water, sanitary sewer, or stormwater drainage infrastructure into areas not previously served by such utilities, as the Project would be adequately served by existing infrastructure in the Project area. Additionally, given the Project site and surrounding area are already served by existing wet and dry utilities, it is unlikely that the Project would tax existing community service facilities or require construction or expansion of new regional-scale facilities with capacity to serve more than just the Project. Further, the Project would not extend an existing roadway facility into an area that does not currently provide vehicular access; thus, the Project would not result in indirect population growth by providing vehicular access to an area presently lacking such access. Because Alternative 3 proposes the same uses on the same site as the Project with a slightly less intensity, its growth would also not result in indirect population growth by providing vehicular access to an area presently lacking such access.

(3) The residents and employees at the Project site would place increased demands on existing community services, such as fire protection, police protection, schools, libraries, and utilities. However, the Project would not increase such demands to the extent that it would require new or expanded facilities or infrastructure. Substantiation for this conclusion is provided in Section 3.5.15, Public Services and Recreation, and Section 3.5.19, Utilities and Service Systems, of this EIR. The growth associated with the Project falls within the population and housing growth identified for the region in the SCAG RTP/SCS. Growth projections in the RTP/SCS are used in part for infrastructure planning and development, to ensure that regional infrastructure is properly sized and planned for expected development. As such, because the population and housing growth associated with the Project falls within growth projections, it is expected that existing and planned infrastructure would accommodate the Project. As such, while the Project would cause some population growth, it is not expected to result in the construction of new facilities or infrastructure that would cause environmental effects. Because Alternative 3 proposes the same uses on the same site as the Project with a slightly less intensity, it is also not expected to result in the construction of new facilities or infrastructure that would cause environmental effects.

(4) Approval of the Project is not expected to encourage or facilitate other activities that could significantly affect the environment. The Project site is surrounded by existing urban development. The Project would require approval of a General Plan Amendment and approval of a new Specific Plan, primarily to allow for the construction of residential land uses and increased density at the Project site. Furthermore, as with the Project, any other new development projects in the City would be subject to environmental review under CEQA. For any significant environmental effects that are identified, mitigation measures, Project alternatives, or the identification of overriding considerations would be required pursuant to CEQA. Additionally, projects would be subject to discretionary review and approval by City decision makers.

Large development projects, particularly in undeveloped or sparsely developed areas, have the potential to induce or accelerate development in surrounding areas, as new businesses and/or residential developers seek to situate development in new opportunity areas where there is a shortage of services and/or housing. However, the Project would be located within an urbanized metropolitan area that supports a wide variety of existing services, businesses, and housing options. While the Project would introduce new dwelling units and new commercial space to the City, the number of dwelling units and the amount of commercial space

would be consistent with the SCAG projections for population and housing in the region through the planning horizon year of 2045. For these reasons, the new businesses and housing units associated with the Project are not expected to directly induce or accelerate growth in the surrounding areas. Because Alternative 3 proposes the same uses on the same site as the Project with a slightly less intensity, it is also not expected to directly induce or accelerate growth in the surrounding areas.

In conclusion, the Project and Alternative 3 would cause economic growth, population growth, and housing growth. However, the growth would be limited to the site itself and falls well within City and regional growth projections for population and housing. The Project and Alternative 3 would not remove obstacles to population growth and would not cause an increase in population such that new community facilities or infrastructure would be required outside of the Project or Alternative 3. Lastly, the Project and Alternative 3 are not expected to encourage or facilitate other activities that could significantly affect the environment, as explained above. For these reasons, the Project is not considered to be significantly growth-inducing.

3.4.23 Mandatory Findings of Significance

a) ***Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***

Facts

Under the existing conditions, the Project site is predominantly developed with paved surfaces and manmade structures. A limited amount of landscaping comprised of ornamental trees, shrubs, and turf is located within the Project site and adjacent public rights-of-way. This vegetation, which was planted in conjunction with the existing residential users and the City, is ornamental in nature, entirely surrounded by urban development, and does not form a cohesive plant community that would provide quality suitable habitat for candidate, sensitive or special-status wildlife species, or would support wildlife movement. Thus, the Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal. Additionally, the Project site has undergone extensive modification over time, with the entirety of the site's surface having been created by the introduction of fill materials to reclaim previously unusable land. Fill soils underlying the Project site range from 15 to 35 feet in depth and the Project would involve ground disturbance as deep as 45 feet below ground surface. While the Project would disturb native sediments, the entire Project site was historically fully inundated which would have made the site uninhabitable for occupation, making the likelihood to encounter archeological, tribal cultural, or paleontological resources very low. Nonetheless, MM-TCR-1 and MM-PALEO-1 would be required. MM-TCR-1 involves tribal monitoring during excavation in native sediments to minimize potential impacts to archaeological and tribal cultural resources. MM-GEO-1 would involve implementation of a Paleontological Resources Impact Mitigation Program (PRIMP) to help ensure that, in the event of an unanticipated find of a significant paleontological resource, such as identifiable invertebrate and vertebrate fossils, the resource is protected, researched, and potentially preserved (if subsequently deemed warranted) to maintain integrity and significance.

While the Project site is unlikely to contain archeological, tribal cultural, or paleontological resources, implementation of MM-TCR-1 and MM-GEO-1 would ensure that should these resources be encountered, appropriate measures are undertaken to preserve and evaluate them should they provide important information about California's history or prehistory. Thus, the Project would not eliminate important examples of the major periods of California history or prehistory.

In summary, the Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

Alternative 3 is located on the same site as the Project. Thus, Alternative 3 would not result in significant impacts related to the quality of the environment, like the Project.

Finding

The City finds based on substantial evidence that Alternative 3 does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Facts

The Project's project-level and cumulative impacts were evaluated within the EIR. While the Project would result in one significant and unavoidable impact related to short-term construction noise, the impact would not be cumulatively considerable. All other cumulative impacts were determined to be less than significant or less than significant with incorporation of mitigation. As such, the Project does not have impacts that are individually limited, but cumulatively considerable.

Alternative 3 would involve a similar development to the Project, but at reduced density and scale, and would thus have impacts that are similar to or of a lesser magnitude than the Project. Thus, Alternative 3 would not result in cumulatively considerable impacts, similar to the Project.

Finding

The City finds based on substantial evidence that cumulative impacts would be less than significant.

c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Facts

The Project involves the construction and operation of a residential neighborhood with limited neighborhood serving commercial uses. Construction of the Project would be conducted by qualified contractors who would be required to comply with all applicable health and safety measures. Additionally, the Project would implement PDF-HAZ-1, which requires implementation of a Soil Management Plan to ensure that construction workers are not exposed to potentially hazardous materials that may underlie the Project site. Construction of the Project would result in a significant and unavoidable short-term construction noise impact for sensitive residential receptors surrounding the Project site; however, these activities would be periodic and short-term in nature and would occur only for brief periods during the overall construction phase. While these noise levels exceed the City's threshold of significance and would cause annoyance to adjacent sensitive receptors, they would not rise to levels that would have a substantial adverse effect on human beings. Additionally, the Project's design calls for extensive subsurface grading work that would result in potential contaminants being dispersed and diluted to ranges that would not pose a health risk to future occupants of the site. Nonetheless, in an abundance of caution, the Project's occupiable spaces would be underlain with a soil vapor barrier that would prevent potentially hazardous gasses from entering interior spaces. As such, by way of the Project's design, the Project would not pose a risk to future occupants of the site. Lastly, the Project does not involve uses, such as heavy industrial uses, that have the potential to cause substantial adverse effects on human beings, either directly or indirectly.

Alternative 3 would involve a similar development to the Project, but at reduced density and scale, and would thus have impacts that are similar to or of a lesser magnitude than the Project. Alternative 3 would include the same design features and would be required to comply with the same applicable regulations. Thus, Alternative 3 would not cause substantial adverse effects on human beings, either directly or indirectly.

Finding

The City finds based on substantial evidence that impacts relating to substantial adverse effects on human beings would be less than significant.

3.5 Alternatives

In accordance with CEQA Guidelines Section 15126.6(a), an EIR must describe and compare a range of reasonable alternatives to a project, or alternative locations for a project, that could feasibly attain most of the basic project objectives but avoid or substantially lessen any significant environmental impacts associated with a project and evaluate the comparative merits of such alternatives. An EIR must consider a reasonable range of feasible alternatives to facilitate informed decision making and public participation. An EIR need not consider every conceivable alternative to a project and is not required to consider alternatives that are infeasible. The lead agency shall select a range of project alternatives and disclose its reasoning for selecting those alternatives. The selection of such alternatives is governed by the rule of reason, which requires an EIR set forth only those alternatives

necessary to permit a reasoned choice. The Draft EIR Alternatives Analysis, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the Project's significant impacts.

One Project alternative was selected for consideration by the City's decision-makers in lieu of the Project: Alternative 3. This alternative is discussed in Section 2 and Section 3.5.3.4.

3.5.1 Project Objectives

CEQA Guidelines Section 15124(b) states that the Project Description shall contain a statement of the objectives sought by the proposed project. The Project objectives assist the City of Carson in developing a reasonable range of alternatives to be evaluated in the EIR. The Project's specific objectives are as follows:

1. Create a vibrant, new residential neighborhood with neighborhood-serving commercial uses and open-space amenities that furthers the land use, economic development, and urban design goals of the General Plan.
2. Provide new market rate and affordable housing opportunities and potential senior, age-restricted senior units across a mixture of housing products.
3. Assist the City of Carson in meeting its RHNA goals and diversify the City's housing stock and improve the local jobs/housing imbalance.
4. Reduce automobile trips by creating a mixed-use, pedestrian-oriented environment with residences and commercial uses near employment opportunities, recreational facilities, and publicly accessible open space within the City's core and in an area that is served by multiple transit lines.
5. Facilitate pedestrian and bike connectivity between historically disconnected areas within the City through the development of a pedestrian bridge over the Torrance Lateral Drainage Canal, linking the Project site with The District Specific Plan Area and in particular, the Carson Country Mart area (approved under the District at South Bay 2021 project). Providing a connection between the Project site and the District Specific Plan Area would further increase the supply of services, employment opportunities, recreational facilities, and publicly accessibly open space that is available within walking and biking distance to future residents in the area.

3.5.2 Alternatives Considered and Eliminated During the Project Planning Process

The CEQA Guidelines provide that this EIR should "identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the Project planning process and briefly explain the reasons underlying the Lead Agency's determination" (14 CCR 15126.6[c]). The following is a discussion of the Project alternatives considered during the planning process and the reasons they were not selected for detailed analysis in this EIR. Alternatives that were considered for further analysis, including a no project alternative, are discussed in Section 6.3.

Alternative Sites

CEQA does not require that an analysis of alternate sites always be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternate site, then a project alternative should be considered and analyzed in the EIR. Pursuant to CEQA Guidelines Section 15126.6(f)(2), in making the decision to include or exclude analysis of an alternate site, the "key question and first step in analysis is whether any of the significant effects of the

project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR."

Alternative sites were ultimately rejected from further analysis in the EIR due to infeasibility, failure to meet Project objectives and inability to avoid significant environmental impacts, as discussed in the following subsections.

Infeasibility. A search for other suitable sites for Project development was conducted. However, the City is highly urbanized and is largely built out. A search of similarly sized, available properties within a 10-mile radius of the City failed to find any 25- to 35-acre sites that are currently on the market and available to purchase (LoopNet 2022). While not currently for sale, the area immediately north of the Project site (i.e., the area within the District Specific Plan Area could potentially be suitable for development of a mixed-use project. However, this area has already been the subject of an approved specific plan and several development proposals are currently in advanced planning stages, including a proposal recently approved by the City Council on May 23, 2022 amend the District Specific Plan to accommodate a proposed project including light industrial, commercial and recreational/open space land uses. These active development proposals would further complicate the feasibility of obtaining the rights to develop the Project within this area. Given that the Project Applicant does not have the right to develop other sites and no sites are currently available, obtaining another site of a similar size and similar location is not considered feasible.

Failure to Meet Objectives. Use of alternative sites would fail to achieve several of the Project objectives, which are dependent on the specific location of the Project. The Project site is located in the City's core and is served by multiple transit lines and therefore meets the objective of reducing automobile trips by creating a mixed-use, pedestrian-oriented environment with residences and commercial uses near employment opportunities, recreational facilities, and publicly accessible open space. The site also meets the highly location-specific Project objective of facilitating pedestrian and bike connectivity through the development of a pedestrian bridge over the Torrance Lateral Drainage Canal, which would link the Project site with the District Specific Plan Area. Finding another site within the City's core that would have been in close enough proximity to the District Specific Plan Area to facilitate pedestrian and bike connectivity between the two areas was not considered feasible, and an alternative site would therefore not link the Project site to the District Specific Plan Area and would not increase the supply of services, employment opportunities, recreational facilities, and publicly accessibly open space that is available within walking and biking distance to future residents in the area. Based on the foregoing, implementation of the Project on an alternative site would not meet the Project's objectives.

Environmental Impacts. The Project would result in a significant environmental impact related to short-term, on-site construction noise due to the predicted magnitude of construction noise and the proximity of off-site sensitive receptors. Moving the Project to a different site could potentially lessen this significant impact depending on the distance to sensitive receptors; however, due to the built-out nature of the City, it is unlikely that construction noise impacts would be lessened or avoided, as suitable sites for residential development typically tend to be proximate to other residential developments, which are widely distributed throughout the City. As such, moving the Project to a different site is not anticipated to avoid or substantially lessen the Project's sole significant and unavoidable impact.

Increased Intensity Alternative

The Increased Intensity Alternative, which would include all multifamily rental housing instead of a mix of multi-family and owned townhomes, was considered. Similar to the Project, this Alternative would require a General Plan Amendment and a Zoning Amendment and include the preparation and adoption of a specific plan. The Increased

Intensity Alternative would have included a greater number of overall multifamily rental units that could provide additional flexibility and opportunity to accommodate a larger range of multifamily housing types (such as senior housing) and the potential to satisfy more of the IASP-required affordable housing units on site. However, the Increased Intensity Alternative would not fulfill a key component of the Project objectives, specifically, to provide a mixture of housing products (such as multifamily for-sale condominium units) (Objective 2). Additionally, the single housing product type proposed under this alternative (i.e., multi-family rental housing), would introduce an abrupt shift in residential types when compared to the existing single-family residential neighborhood immediately west and south of the Project site. The proposed Project proposes a significant townhome component that would be located on the western side of the development to provide a more sensitive transition to the existing single-family homes to the west and south of the Project. Removal of the townhome component would eliminate the purposeful inclusion of townhomes to provide a transition from the Project's new community to adjacent single-family uses and also would not provide a mix of housing products (Objective 2). This alternative was therefore rejected from further analysis in the EIR due to failure to meet Project objectives, failure to provide a transition between the Project site and the adjacent residential land uses, and failure to reduce environmental impacts, as discussed in greater detail in the following summary.

Failure to Meet Objectives. While it would be technically feasible to develop an increased intensity project including entirely multifamily rental housing, this alternative would not meet the Project objective of providing new market rate and affordable housing opportunities across a *mixture* of housing products that will assist the City in meeting its RHNA goals and diversify the City's housing stock. While a development containing entirely multifamily rental housing would assist in providing new housing opportunities, it would result in a less diverse mix of housing products than the Project.

Environmental Impacts. The Project would result in a significant environmental impact related to short-term, on-site construction noise. Construction of an entirely multifamily rental development would likely have substantially similar construction and operational impacts to the Project for most resource areas evaluated. However, an Increased Intensity Alternative would result in an increase in the number of multifamily units, along with an expected increase in the number of residences, would correspond with an increase in total trips generated. This would result in an increase in total vehicle miles traveled (VMT). An increase in VMT would result in an increase in air quality, GHG, and energy use impacts, based on the direct correlation between additional VMT and the emissions/energy use that would result. An increase in total trips would also correlate with increased off-site roadway noise impacts associated with residents accessing the Project site, which could be significant for surrounding off-site receptors along access routes, such as residences along Grace Street, west of the Project site. The Increased Intensity Alternative would also not reduce the Project's significant and unavoidable construction noise impact, as similar—if not greater due to the increased size of buildings—construction activities would still occur on the Project site in the same locations as would occur for the Project. As such, the Increased Intensity Alternative would not avoid or substantially lessen any of the significant impacts of the Project and could result in new potentially significant impacts.

All Commercial Alternative

An All Commercial Alternative, which would consist entirely of commercial uses with no residential component, was considered. Other components such as the inclusion of publicly accessible open spaces and a pedestrian bridge over the Torrance Lateral Drainage Canal would be the same as the Project. Like the Project, the All Commercial Alternative would require a General Plan Amendment and a Zoning Amendment and include the preparation and adoption of a specific plan. Assuming a development intensity of 0.32 square feet of floor area per acre (consistent

with the average for commercial space in the City [City of Carson 2004]), this Alternative would theoretically involve the development of 380,680 square feet of commercial space. A shopping center use was assumed for the evaluation of this alternative. This alternative was rejected from further analysis in the EIR due to failure to meet Project objectives, particularly the lack of inclusion of residences (Objectives 1, 2, 3, and 4), and failure to reduce environmental impacts, as discussed in the following summary.

Failure to Meet Objectives. While it would be technically feasible to develop an entirely commercial project, this alternative would fail to meet many of the Project objectives. The All Commercial Alternative would not create a vibrant, new residential neighborhood provide new market rate and affordable housing opportunities across a mixture of housing products, or assist the City of Carson in meeting its RHNA goals and diversity the City's housing stock because it would not contain a residential housing component (Objectives 1, 2, and 3). It would also not reduce automobile trips by creating a mixed-use, pedestrian-oriented environment with residences and commercial uses near employment opportunities, recreational facilities, and publicly accessible open space within the City's core and in an area that is served by multiple transit lines because it would not be a mixed-use development with a residential component (Objective 4).

Environmental Impacts. The Project would result in a significant environmental impact related to short-term, on-site construction noise. Construction of the All Commercial Alternative would likely have similar construction impacts to the Project and would not avoid this significant and unavoidable impact. However, with regard to operation, an All Commercial Alternative would result in an increased number of trips compared to the proposed Project. The proposed Project includes 380 townhomes, 653 multifamily housing dwelling units, 180 senior adult housing dwelling units (assuming maximum build out), and 10,352 square feet of commercial space. As discussed in the Local Transportation Assessment (Appendix I), the proposed Project would result in a total of 6,727 daily gross trips. By comparison, using trip generation rates from the Institute of Transportation Engineers Trip Generation Manual, 10th Edition, an All Commercial Alternative (Institute of Transportation Engineers Land Use Code 820) would generate 14,089 daily gross trips. This increase in trips to and from the Project site would result in increased traffic on the local circulation system and would result in far greater (i.e., at least two times as many) air pollutant and greenhouse gas emissions from mobile sources (i.e., vehicles accessing the Project site). The increase in trips would also result in greater levels of roadway traffic noise and energy use. As such, the All Commercial Alternative would not avoid or substantially lessen any of the significant impacts of the Project and could potentially result in new significant noise and transportation impacts. It would also not accomplish many of the Project objectives, namely, creating a vibrant, new residential neighborhood (Objective 1), providing new housing opportunities (Objective 2), assisting the City in meeting its RHNA goals (Objective 3), and reducing automobile trips (Objective 4). As such, an All Commercial Alternative was rejected for further analysis.

3.5.3 Alternatives Analyzed in the Draft EIR

3.5.3.1 Alternative 1A – No Project and Non-Operational Mobile Home Park Alternative

Description of Alternative 1A

Alternative 1A assumes the Project would not proceed, no new permanent development or land uses would be introduced within the Project site, and the existing environment would be entirely maintained. No further actions would occur on the Project site, such as coach removal or demolition of existing structures and facilities. The existing Mobile Home Park would continue to occupy the Project site but would become non-operational and unoccupied, as the Park Owner has already sought a RIR and begun the process of closing the Park. Minimal maintenance and security activity at the Park is assumed after closure.

Impact Summary of Alternative 1A

Construction impacts associated with the Project would be avoided because no development would occur on the Project site under Alternative 1A. The existing Mobile Home Park coaches, structures, and facilities would remain in place. However, operation of the Park would cease, as a Relocation Impact Report (RIR) has already been sought by the Park Owner and approved by the City Council, and the Park Owner has proceeded with the closure of the Mobile Home Park. As such, Alternative 1A would result in a vacant and unused mobile home park within the City's core. There would be no potential construction-related impacts to any tribal cultural resources or unique paleontological resource or geologic feature that may be present on site. Construction-related air quality impacts, noise impacts (including the Project's significant and unavoidable short-term construction noise impact), traffic impacts, and energy consumption impacts would also be avoided since construction activities associated with the Project would not occur on the site.

Operational impacts associated with the Project would be mostly avoided since no development at the Project site would occur. The height, massing, and lighting of buildings on the Project site would remain. As such, no aesthetic impact related to development of new facilities would result. However, the presence of a vacant mobile home park after the Mobile Home Park is closed could create an undesirable aesthetic environment in both the short and long-term. The number of vehicle trips to/from the Project site would be eliminated once closure of the Mobile Home Park is complete, with the exception of occasional trips for maintenance, security, and nuisance abatement. Thus, mobile emissions, vehicular noise, traffic, or petroleum consumption would be virtually eliminated. Water usage, sewage generation, and need for other public services and utilities would also be eliminated with Alternative 1A. The existing use is in conflict with existing zoning and land use designations. Under Alternative 1A, no General Plan Amendment or specific plan would be approved, and the existing land use conflict would remain (i.e., a vacant mobile home park would exist on a site that is zoned Commercial, Automotive and RM-8-D and designated by the City's General Plan for Regional Commercial and Low Density Residential uses). With the exception of failing to resolve the land use and zoning conflict associated with the existing use, Alternative 1B would result in decreased environmental impacts relative to the Project.

Finding

Although construction and operation impacts associated with the Project would be avoided because no development would occur on the Project site. Alternative 1A would not achieve any of the Project objectives. It would not create a new residential neighborhood (Objective 1), provide new market rate and affordable housing opportunities across a mixture of housing products (Objective 2), or assist the City in meeting its RHNA goals and diversifying the City's housing stock because it would not develop any housing products at the Project site (Objective 3). It would not create a pedestrian-oriented environment with residences and commercial uses near employment opportunities, recreational facilities, and publicly accessible open space within the City's core and in an area that is served by multiple transit lines (Objective 4). Lastly, it would not facilitate pedestrian and bike connectivity between historically disconnected areas within the City through the development of a pedestrian bridge over the Torrance Lateral Drainage Canal, linking the Project site with the District Specific Plan Area, and further increasing the supply of services, recreational facilities, and publicly accessibly open space that is available within walking and biking distance to future residents in the area (Objective 5). Alternative 1A would not construct the pedestrian bridge or develop facilities that would create employment opportunities or include service-oriented facilities, recreational facilities, or publicly accessible open spaces.

3.5.3.2 Alternative 1B – No Project and Mobile Home Park Removal Alternative

Description of Alternative

Alternative 1B assumes the Project would not proceed and no new permanent development or land uses would be introduced within the Project site but that additional actions associated closure of the Mobile Home Park closure would occur, such as coach removal and demolition of existing structures and facilities. It is assumed that coach pads and pavement would be left on site and the site would consist of a vacant, mostly paved lot. Minimal maintenance and security activity at the Park is assumed after closure.

Impact Summary of Alternative 1B

Construction impacts associated with the Project would be substantially reduced with Alternative 1B because the only activities that would occur would be associated with coach removal and demolition of existing structures and facilities. Operation of the Park would cease, as the City has already approved the RIR authorizing Mobile Home Park closure. As such, Alternative 1B would result in a vacant and undeveloped lot within the City's core. There would be no potential construction-related impacts to any tribal cultural resources or unique paleontological resource or geologic feature that may be present on site, as demolition activities would not disturb subsurface soils. Construction-related air quality, traffic, and energy consumption impacts would be substantially reduced due to the reduced scale of activity. Construction-related noise impacts would still occur, albeit to a lesser degree due to a lack of construction. However, as discussed in Section 3.5.13, Noise, demolition activities are still anticipated to result noise levels as high as 70.4 A-weighted decibels (dBA) L_{eq} at the nearest sensitive receptor. Even with implementation of MM-NOI-1 (noise best management practices) and MM-NOI-2 (sound barrier), the increase in ambient noise levels caused by demolition activities would result in a significant and unavoidable construction noise impact (residual noise levels would be 60.4 dBA L_{eq}, which exceeds the threshold of 60.1 dBA L_{eq}).

Operational impacts associated with the Project would be mostly avoided since no development at the Project site would occur. Demolition activities would result in vacant, unused lot within the City's core. While these conditions

would not trigger an impact in the context of the thresholds of significance listed in Appendix G of the CEQA Guidelines, the presence of a vacant lot could create an undesirable aesthetic environment in both the short and long-term. The number of vehicle trips to/from the Project site would be eliminated once closure of the Mobile Home Park is complete, with the exception of occasional trips for maintenance and nuisance abatement. Thus, mobile emissions, vehicular noise, traffic, or petroleum consumption would be virtually eliminated. Water usage, sewage generation, and need for other public services and utilities would also be eliminated with Alternative 1B. The existing use is in conflict with existing zoning and land use designations. Under Alternative 1B, this non-conforming use would be eliminated, but no other permitted use would take its place. In summary, Alternative 1B would result in decreased environmental impacts relative to the Project and would substantially lessen but not eliminate the Project's significant and unavoidable construction noise impact.

Finding

Although construction impacts associated with the Project would be substantially reduced and operation impacts associated with the Project would be avoided. Alternative 1B would not achieve any of the Project objectives. It would not create a new residential neighborhood (Objective 1), provide new market rate and affordable housing opportunities across a mixture of housing products (Objective 2), or assist the City in meeting its RHNA goals and diversifying the City's housing stock because it would not develop any housing products at the Project site (Objective 3). It would not create a pedestrian-oriented environment with residences and commercial uses near employment opportunities, recreational facilities, and publicly accessible open space within the City's core and in an area that is served by multiple transit lines (Objective 4). Lastly, it would not facilitate pedestrian and bike connectivity between historically disconnected areas within the City through the development of a pedestrian bridge over the Torrance Lateral Drainage Canal, linking the Project site with the District Specific Plan Area, and further increasing the supply of services, recreational facilities, and publicly accessibly open space that is available within walking and biking distance to future residents in the area (Objective 5). Alternative 1A would not construct the pedestrian bridge or develop facilities that would create employment opportunities or include service-oriented facilities, recreational facilities, or publicly accessible open spaces.

3.5.3.3 Alternative 2 – Development Consistent with Existing General Plan/Zoning

Description of Alternative

Alternative 2 includes development of the Project site with uses consistent with the existing General Plan and zoning designations. The City's General Plan Land Use map designates the Project site as Regional Commercial (east) and Low Density Residential (west) (City of Carson 2015). Per the City's General Plan, Regional Commercial includes uses intended to serve a broad population base and offer a wide range of services to both the community and the region. Businesses in this designation include major department stores, specialty shops, other retail and service uses, automobile and other vehicle dealerships, and hotels and motels. Regional Commercial is intended to provide for the City's primary regional shopping center and its peripheral areas. Low Density Residential includes all residential areas composed of single-family detached dwellings and other development considered harmonious with such low-density residential development. The maximum density allowed is 8 dwelling units per acre (City of Carson 2004).

The corresponding zoning for the Project site is Commercial, Automotive (east), and RM-8-D zone (west) (City of Carson 2017). Automatically permitted uses under Commercial, Automotive zoning primarily consist of vehicle sales and service uses. Automatically permitted uses under RM-8 include single-family dwellings, mobile homes, religious group quarters, home community care facilities, single-room occupancy housing, supportive housing, transitional housing, and public elementary or secondary schools. Per the City's Zoning Code, "D" identifies a Design Overlay designation, created "primarily to provide for Site Plan and Design Review of future development within the designated areas in order to achieve special standards of design, architectural quality, style and compatibility, landscape treatment, and functional integration of neighboring developments."

The City is currently updating its General Plan, which is anticipated to be comprehensively updated with an accompanying EIR by late-2022. However, because the update is not complete, Alternative 2 relies on the existing zoning and land use designations at the time of this analysis.

Based on the existing land uses and zoning, the Project site could potentially support automotive sales uses and residential uses. As such, Alternative 2 has been developed to include construction and operation of a vehicle dealership (automobile or other vehicle such as motorcycles or recreational vehicles) with a service center on the eastern 12.1 acres of the site and construction and operation of single-family residential uses with a maximum density of 8 dwelling units per acre on the western 15.1 acres of the site. Using reference data from other auto dealerships within the City, it is anticipated that an auto dealership would have a floor area ratio of approximately 0.31, which would equate to an approximately 165,000-square-foot auto dealership. As the western portion of the site is approximately 15 acres, the maximum total number of dwelling units would be approximately 120. Alternative 2 would include the demolition of the existing Park on the site, previously approved for closure by the City Council. No General Plan Amendment, zone change, or specific plan would be required for Alternative 2. A pedestrian bridge would not be constructed. The signalization of the Grace Avenue/213th Street Intersection, would be unchanged from the Project.

Impact Summary of Alternative 2

The Project would have no impacts or less-than-significant impacts in all resource areas other than construction noise. Section 6.3.2 of the Final EIR provides a comprehensive comparison of the impacts of Alternative 2 relative to the Project.

Finding

Although Alternative 2 would reduce many of the projects impacts, Alternative 2 would fail to achieve many of the Project objectives. It would not create a vibrant, new residential neighborhood with neighborhood-serving commercial uses, and open-space amenities that furthers the land use, economic development, and urban design goals of the General Plan (Objective 1). Because it would consist of only single-family dwelling units, it would not provide housing opportunities across a mixture of diverse housing products (Objective 2). Moreover, as Alternative 2 would be compliant with the underlying zoning, it would not involve a Development Agreement and there would be no legal mechanism for the City to secure an affordable housing benefit as with the Project (Objective 2). It would assist the City in meeting its RHNA goals, albeit to a lesser extent than the Project, but it would not assist the City in diversifying its housing stock (Objective 3). It would not reduce automobile trips by creating a mixed-use, pedestrian-oriented environment with residences and commercial uses near employment opportunities, recreational facilities, and publicly accessible open space within the City's core (Objective 4). Those respective features would also not be in an area that is served by multiple transit lines because it would not create a mixed-

use development at the site (Objective 4). Lastly, it would not facilitate pedestrian and bike connectivity between historically disconnected areas within the City (Objective 5). A pedestrian bridge over the Torrance Lateral Drainage Canal would not be built. As such, the benefits of linking the Project site with the District Specific Plan Area and the approved Carson Country Mart would not be realized. The supply of services, employment opportunities, recreational facilities, and publicly accessibly open space available within walking and biking distance to future residents in the area would not be increased. This would also not provide the economic benefits that would be realized by connecting persons with the businesses, amenity areas, and dining opportunities within the Carson County Mart area.

3.5.3.4 Alternative 3 – Reduced Density and Sensitive Transition Alternative

Description of Alternative

Alternative 3 includes construction and operation of a development similar to and within the same general footprint as the Project, but the development would involve a lower density residential component and smaller scale. To provide a more sensitive transition between the single-family residential neighborhood along Grace Avenue, a row of detached townhome units would be located along the western boundary of the Project site along Grace Avenue in lieu of the Project's attached townhome units on the western boundary of the Project site. Attached townhome units would still be included, but they would be located in between the detached townhome units and the multifamily apartment units. Fewer attached townhome units would be provided given the addition of the detached townhome units. Alternative 3 would consist of681 non-age restricted apartment units, 83 apartment units that will be rented to seniors, 323 attached townhome units and 28 detached townhome units. The remaining attached townhome units would also be set back further away from existing residences along the southwest and south property line. The commercial and open space components would be largely unchanged from the Project, aside from potential minor spatial reconfiguration, and would encompass approximately the same square footages as the Project. The pedestrian bridge over the Torrance Lateral Drainage Canal to the north of the Project site, as well as the signalization of the Grace Avenue/213th Street Intersection, would be unchanged from the Project.

As with the Project, Alternative 3 would include adoption of a specific plan that is consistent with the development proposed (no modifications to the proposed IASP would be required under this alternative). Notably, Alternative 3 would provide a more gradual and sensitive transition between the higher-density apartment component of the development and the existing single-family residential neighborhood to the west of the Project site across Grace Avenue by placing detached townhome housing that is more consistent with the scale and spacing of the residential neighborhoods immediately adjacent to the area, as compared to the attached, more densely configured, townhomes proposed on the western boundary of the Project's site plan.

Impact Summary of Alternative 3

The Project would have no impacts or less-than-significant impacts for all resource areas other than construction noise. Section 6.3.3 of the Final EIR provides a comprehensive comparison of the impacts of Alternative 3 relative to the Project.

Finding

Alternative 3 would reduce many of the projects impacts, and given the substantial similarities between Alternative 3 and the proposed Project, Alternative 3 would meet all of the Project objectives, but in some cases to a lesser extent than the Project. Given that Alternative 3 would maintain residential, commercial, and open space uses, and provide design and development regulations within the proposed IASP, Alternative 3 would meet the objective of creating a vibrant, new residential neighborhood with neighborhood-serving commercial uses and open-space amenities that furthers the land use, economic development, and urban design goals of the General Plan (Objective 1). The mix of housing types would meet the objective of providing new market rate and affordable housing opportunities across a mixture of housing products, assisting the City of Carson in meeting its RHNA goals, and diversifying the City's housing stock (Objectives 2 and 3). However, Alternative 3 meets this Objective to a lesser extent than the Project as it is providing fewer residences (98 fewer units). Because Alternative 3 would be developed in the same location as the Project, involve a mix of residential and commercial uses, and involve the creation of pedestrian pathways, greenbelts, and open space, Alternative 3 would meet the objective of reducing automobile trips by creating a mixed-use, pedestrian-oriented environment with residences and commercial uses near employment opportunities, recreational facilities, and publicly accessible open space within the City's core and in an area that is served by multiple transit lines (Objective 4). Lastly, because Alternative 3 would also involve the construction of a pedestrian bridge and the creation of pedestrian and bike pathways, greenbelts, and open space, Alternative 3 would meet the objective of facilitating pedestrian and bike connectivity between historically disconnected areas within the City through the development of a pedestrian bridge over the Torrance Lateral Drainage Canal, linking the Project site with the approved Carson Country Mart located within The District Specific Plan Area, and further increasing the supply of services, employment opportunities, recreational facilities, and publicly accessibly open space that is available within walking and biking distance to future residents in the area (Objective 5).

In summary, Alternative 3 would meet all of the Project objectives.

3.5.3.5 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

A comparative summary of the environmental impacts associated with each alternative is provided in the Draft EIR. As shown, Alternative 1A (No Project and Non-Operational Mobile Home Park Alternative) would be the Environmentally Superior Alternative, as it would result in no environmental impacts aside from a potentially significant impact related to land use and planning and a less-than-significant impact related to utilities and service systems. Therefore, as required by CEQA, since the No Project Alternative would be the environmentally superior alternative, Alternative 2 (Development Consistent with Existing General Plan/Zoning) has been identified as the other Environmentally Superior Alternative.

In general, Alternative 2 is environmentally superior to Alternative 3 for the following reasons.

- Alternative 2 would result in the generation of 1,000 fewer average daily trips than the Project, while Alternative 3 would result in the generation of 160 fewer average daily trips than the Project. This difference

in trips generated for Alternative 2 compared to Alternative 3 would result in a corresponding reduction in air pollutant emissions from mobile sources (i.e., vehicles accessing the site).

- Alternative 2 generally involves less building area and fewer residential units. For the reasons discussed above, these would result in corresponding reductions in the severity of impacts for air quality, greenhouse gas emissions, noise, and transportation.

While Alternative 2 would not avoid the Project's significant and unavoidable short-term construction noise impact, it would not result in impacts that are greater than those of the Project and would further reduce the magnitude of many of the Project's already less-than-significant impacts. However, Alternative 2 would fail to meet almost all of the Project Objectives.

In contrast, Alternative 3 (Reduced Density and Sensitive Transition) would meet all of the Project Objectives and would be environmentally superior to the Project. While Alternative 3 would not avoid the Project's significant and unavoidable short-term construction noise impact (but it would lessen it), it would not result in impacts that are greater than those of the Project and would further reduce the magnitude of many of the Project's already less-than-significant impacts.

3.6 Significant and Unavoidable Impacts

Section 15126.2(c) of the CEQA Guidelines requires than an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(c) states:

> Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As discussed in Section 3.5, Impact Area Findings, at the project and cumulative levels, the Project and Alternative 3 would result in significant and unavoidable impacts related to short-term construction noise. For all other environmental issue areas, the Project and Alternative 3 would result in no impact or impacts that are either less than significant or less than significant with mitigation incorporated.

The City hereby finds that in accordance with CEQA Guidelines Section 15091(a)(1) that all feasible mitigation measures to substantially reduce or avoid the Project's and Alternative 3's significant impacts and significant cumulative impacts have been incorporated into Alternative 3. Despite these measures, impacts as set forth above will remain significant and unavoidable.

In accordance with CEQA Guidelines Section 15091(a)(3), the City further finds that specific economic, legal, social, technological, or other considerations make infeasible any mitigation measures or other alternatives that would reduce of avoid any of Alternative 3's significant impacts.

3.7 Statement of Overriding Considerations

Pursuant to PRC Section 21081(b) and CEQA Guidelines Sections 15093(a) and (b), the decision-making agency (City of Carson) is required to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable environmental risks when determining whether to approve a project. If the specific economic, legal, social, technological, or other benefits of a project outweigh the unavoidable adverse environmental effects, those effects may be considered "acceptable" (14 CCR 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (14 CCR 15093[b]).

Courts have upheld overriding considerations that were based on a variety of policy considerations including, but not limited to, new jobs, stronger tax base, implementation of an agency's economic development goals, growth management policies, redevelopment plans, the need for housing and employment, conformity to community plan, and provision of construction jobs. See *Towards Responsibility in Planning v. City Council* (1988) 200 Cal App. 3d 671; *Dusek v. Redevelopment Agency* (1985) 173 Cal App. 3d 1029; *City of Poway v City of San Diego* (1984) 155 Cal App. 3d 1037; *Markley v. City Council* (1982) 131 Cal App.3d 656. In accordance with the requirements of CEQA and the CEQA Guidelines, the City finds that the mitigation measures identified in the Final EIR and the MMRP, when implemented, will avoid or substantially lessen virtually all of the significant effects identified in the Final EIR and Errata to the Final EIR for the Project and Alternative 3. However, one impact is considered significant and unavoidable even after incorporation of all feasible mitigation measures.

The one significant impact of the Project and Alternative 3 is related to short-term construction noise. Construction noise levels during demolition and grading activities would exceed the construction noise threshold of 60.1 dBA, which is 5 dB above the existing outdoor ambient sound level at offsite sensitive receptors. While the manner in which the threshold is calculated is static, the corresponding decibel threshold is dependent on the existing outdoor sound levels at offsite sensitive receptors and may vary by project depending on where each project in the City is located. For example, if a project is located far away from offsite sensitive receptors and in a particularly noisy area of the City, it is more likely for that project to be able to generate construction noise without exceeding the City's construction noise threshold. In the case of the proposed Project and Alternative 3, because offsite sensitive receptors are located immediately adjacent to the Project site, and because existing outdoor ambient noise levels are relatively low, the Project and Alternative 3 easily exceed this threshold. To substantially reduce construction-generated noise at nearby receptors, the proposed Project and Alternative 3 would be required to implement MM-NOI-1 and MM-NOI-2. MM-NOI-1 would include the designation of a "Noise Disturbance Coordinator" and orientation of stationary construction equipment away from nearby sensitive receivers, among other requirements. Further, implementation of MM-NOI-2 would reduce the Project's and Alternative 3's construction noise levels by at least 10 dBA with the use of a temporary noise barrier or enclosure along the southern/southwestern portion of the Project site to break the line of sight between the construction equipment and the adjacent residences. Project construction noise levels during the demolition and grading phase, with implementation of MM-NOI-1 and MM-NOI-2, would be 60.4 dBA and 104.2 dBA, respectively. Alternative 3 would result in similar construction noise levels. The impacts for all other phases of construction activity, including building construction, paving, etc., were determined to generate noise levels that would be below the City's threshold with implementation of mitigation. While demolition and grading activities would be short term in nature, construction would nonetheless generate noise that exceeds the City's construction noise threshold of 60.1 dBA during the demolition and grading phase.

No further mitigation measures are feasible. The Final EIR provides detailed information regarding this impact (see also, Findings, Section 3.4.13, Noise).

Construction activities for Alternative 3 would generally be the same as the proposed Project and would require the use of construction equipment throughout the entire site, similar to the Project. Due to the necessity to use construction equipment throughout the entire site, Alternative 3 would not result in construction activities occurring further away from sensitive receptors. Granted, building construction would occur further away from the sensitive receptors, but the construction phases that generate the most noise (i.e., demolition and grading), would still occur in the same locations as under the Project. Given that the same construction activities would occur for Alternative 3 as the Project (and in the same locations), Alternative 3 would similarly result in significant and unavoidable short-term construction noise impacts. Implementation of MM-NOI-1 and MM-NOI-2 would be required to reduce the severity of this impact for Alternative 3, but not to below a level of significance. As such, Alternative 3 would result in significant and unavoidable short-term construction noise impacts, but with reduced severity as compared to the Project given the shortened building construction phase that would be necessary.

The City finds that all feasible mitigation measures identified in the Final EIR that are within the purview of the City would be implemented with Alternative 3. As identified below, the City further finds that the remaining significant unavoidable effect are outweighed and are found to be acceptable due to the following specific overriding economic, legal, social, technological, or other benefits, based upon the facts set forth above, the Final EIR, the Errata to the Final EIR, and the record.

Purpose and Need

California's Housing Element law requires that each city and county in the state develop local housing programs designed to meet its "fair share" of existing and future housing needs for all income groups, as determined by the jurisdiction's Council of Governments and the State Department of Housing and Community Development. This "fair share" allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of not only its resident population, but also for the jurisdiction's projected share of regional housing growth across all income categories.

In the six-county Southern California region, of which the City is a part, the Council of Governments responsible for assigning these regional housing needs to each jurisdiction is the Southern California Association of Governments (SCAG). The regional growth allocation process begins with the State Department of Finance's projection of statewide housing demand for a multi-year planning period, which is then apportioned by the State Department of Housing and Community Development among each of the state's official regions. SCAG has developed the Final Regional Housing Needs Assessment Allocation Plan for the 2021–2029 period. SCAG's adopted 2021 Final Regional Housing Needs Allocation figures identify an overall construction need of 5,618 new units in Carson.

Alternative 3 directly meets this need by providing up to 1,115 high-density residential dwelling units to help offset the City's, region's, and state's need for additional housing supply, as well as providing on-site commercial and food service uses that provide walkable options for residents to patronize and work.

Overriding Benefits Resulting from the Project

The City finds that Alternative 3 would have the economic, legal, social, technological, or other overriding benefits, including region-wide or statewide environmental benefits, listed below. Each of the benefits cited below constitutes

a separate and independent basis that justifies approval of Alternative 3 and outweighs the unavoidable adverse environmental effects of approving Alternative 3 and thus makes the adverse environmental effects acceptable. Therefore, even in the absence of one or more of the reasons set forth below, the City has determined that each remaining reason, or any combinations of reasons, is a sufficient basis for approving the Alternative 3, notwithstanding any significant and unavoidable impacts that may occur.

1. **Provision of Housing Opportunities.** Alternative 3 would involve the development of a vibrant, new residential neighborhood with neighborhood-serving commercial uses and open-space amenities that furthers the land use, economic development, and urban design goals of the General Plan. The neighborhood would include a mix of housing types and choices accommodating a range of consumer life stages and income levels. Alternative 3's residential component includes up to 1,115 total homes, including 681 non-age restricted apartment units, 83 apartment units that will be rented to seniors, 323 attached townhome units and 28 detached townhome units. The mix of housing types and choices would also support a reasonable share of the City's projected regional population growth to help the City meet its required regional housing needs, as detailed in the City's General Plan Housing Element and SCAG's Regional Housing Needs Assessment. The provision of these housing opportunities would assist the City in lowering City's jobs-to-housing ratio and help address the City's current jobs housing imbalance.
2. **Provision of Affordable Housing Opportunities.** Alternative 3 would provide affordable housing opportunities across a mixture of housing products. The Imperial Avalon Development Agreement requires that the developer or related/affiliated entity shall agree to one of the following affordable housing public benefit options: (i) record a deed restriction committing to reserve at least 125 units of Lower Income housing (at various affordability levels at and below 80 percent of the Area Median Income) onsite within the development inclusive of 41 units of Extremely Low Income (at or below 30% AMI), 41 units of Very Low Income (at or below 50% AMI) and 43 units of Lower Income units (at or below 80% AMI), or (ii) record a deed restriction obligating the construction or conversion of 125 units of Lower Income housing (at or below 80% of Area Median Income) at another off-site location anywhere else in the City, which units must be in excess of any affordable housing requirements otherwise required for the project within which they will be constructed, or (iii) pay an in lieu affordable housing fee of $11.61 per square foot of the development's residential floor area. The fulfillment of one of these options would lead to the provision of affordable housing opportunities in an area where available affordable housing options are scarce.
3. **City and Community Benefits.** As part of Alternative 3's Development Agreement, the developer will pay a comprehensive Development Agreement Fee totaling thirty million fifteen thousand three hundred and seventy six dollars ($30,015,376.00). The Development Agreement Fee will fund the following general categories of City improvements and benefits: (i) park and open space acquisition, development and maintenance, (ii) city infrastructure improvements, maintenance and upgrades and (iii) community recreational benefits and subsidies. In addition, as part of the Development Agreement Fee, three hundred thousand dollars ($300,000) shall be paid annually for the term of the Development Agreement by the developer to subsidize Carson residents' fees and costs associated with park and recreational registration, trophies and jerseys ("Carson Park and Recreation Subsidy"). In addition, the developer would pay a public art fee equal to one percent (1%) of the total Project Value as determined by the City building official.
4. **Reduce Automobile Trips**. Alternative 3 would create a sustainable connected neighborhood and reduce automobile trips by creating a mixed-use, pedestrian-oriented environment with residences and commercial uses near employment opportunities, recreational facilities, and publicly accessible open space within the City's core and in an area that is served by multiple transit lines. Alternative 3 would

incorporate a Transportation Demand Management Plan that involves internal capture of trips, a senior housing shuttle, unbundled parking, a car sharing program, and workstation areas. The Transportation Demand Management Plan would encourage the use of active transportation modes, such as walking, biking, carpooling, and taking transit.

5. **Benefits of Sustainable Design.** Alternative 3 would involve the development of a sustainable community and reduce greenhouse gas emissions that contribute to climate change through a variety of planning and design features and mitigation measures. In terms of planning and design, Alternative 3 would provide a walkable and bicycle-friendly environment and a balance of housing and other land uses within the City's urban core, proximate to a variety of services. In addition, Alternative 3 would include a multi-pronged approach to directly decreasing GHG emissions. As part of Alternative 3's Development Agreement, the developer will incorporate approximately 35,000 square feet (total) of photovoltaic panels located on the rooftop of the parking structure for the apartment buildings. The developer will also pre-wire conduit for additional portions of the development located on the residential building rooftop to accommodate potential future solar panel installation. The developer will also equip a total of 50 percent of parking spaces with an electric vehicle charging station benefit, as follows: (a) fifteen percent of the parking spaces shall be fully equipped with electric vehicle chargers and (b) thirty five percent of parking spaces shall be wired with conduit to allow for the future installation of electric vehicle chargers.

   The development has also been designed to maximize energy efficiency and water conservation. Buildings would be designed in accordance with the requirements of the 2019 Title 24 of the California Building Code Standards (CALGREEN). Buildings would be equipped with state-of-the-art occupancy sensors consistency with the California Energy Code in place at the time of permitting. Buildings would include a mechanical dwelling unit system with a Seasonal Energy Efficiency Ratio (SEER) of 15. All windows and exterior façade materials would be consistent with the insulation requirements of the California Energy Code. The development would incorporate elements of the Los Angeles Department of Water and Power low-impact development (LID) strategies and would use low water-usage landscaping. The landscape would be designed with predominantly drought tolerant species and would adhere to Water Efficient Landscape Ordinance (WELO) requirements.

6. **Provision of Publicly Accessible Pedestrian Bridge.** Alternative 3 would involve the construction of a pedestrian bridge to allow for pedestrian and bicycle access over the Torrance Lateral Flood Control Channel from the Project to the District at South Bay Specific Plan area. The bridge would provide both pedestrian and bicycle access. In particular, the pedestrian bridge would connect the Project site with the Carson Country Mart (approved under the District at South Bay 2021 project), which includes a mix of neighborhood commercial and recreational uses. In addition, Alternative 3 would involve the signalization of the Grace Avenue/213th Street intersection, improving local circulation. If for some reason the Developer is unable to secure the required permits or approvals from local agencies, such as the Los Angeles County Flood Control District, to complete the pedestrian bridge, the developer shall provide an in lieu fee cash contribution to the City of four million dollars ($4,000,000) to be used for the purpose of providing an enhanced art walk leading from the Project site to the District Specific Plan area and/or other pedestrian enhancements within the vicinity as determined by the City.

7. **Economic Benefits.** Alternative 3 encourages economic growth and diversity within the City of Carson and County of Los Angeles. The development of 1,115 new residential units increases tax revenues from residential and commercial uses, supports employment of construction workers, and reduces per capita costs for the provision of public services. Additionally, permanent jobs would be created by the development relating to the development's restaurant use and maintenance and leasing activity.

Conclusion

In light of the foregoing, and the information contained within the Final EIR and other portions of the record, the City concludes that implementation of Alternative 3 will result in the development of a beneficial project as outlined above. The City also finds that the benefits identified above outweigh and make acceptable the significant, unavoidable environmental impacts associated with the Alternative 3 and, accordingly, adopts this Statement of Overriding Considerations.

3.8 Mitigation Monitoring and Reporting Program

The Mitigation Monitoring and Reporting Program (MMRP) includes all of the mitigation measures and PDFs identified in the Final EIR and adopted by the City in connection with the approval of the Project and has been designed to ensure compliance with such measures during implementation of Alternative 3. In accordance with CEQA, the MMRP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts the MMRP and finds that the impacts of Alternative 3 have been mitigated to the extent feasible by the mitigation measures identified in the MMRP, incorporated by reference and located in the administrative file, and finds that the MMRP meets the mitigation monitoring program requirement of Public Resources Code Section 21081.6. The City reserves the right to make amendments and/or substitutions of mitigation measures if the City determined that the amended or substituted mitigation measure will mitigate the identified potential environmental impacts to at least the same degree as the original mitigation measure, and where the amendment or substitution would not result in a new significant impact on the environment which cannot be mitigated.

3.9 Consideration of Record; Independent Judgement

In approving the Alternative 3, the City decision-makers have reviewed and considered the Draft EIR and appendices, the Final EIR and appendices, the Errata to the Final EIR, and all other pertinent evidence in the record of proceedings.

The City's consultants prepared the screen check versions of the Draft EIR, Final EIR, Errata to the Final EIR and technical studies. All such materials and all other materials related to the EIR were extensively reviewed and, where appropriate, modified by City representatives. As such, the City finds that the Draft EIR, Final EIR, Errata to the Final EIR, technical studies, and all other related materials reflect the independent judgement and analysis of the Lead Agency.

3.10 Substantial Evidence

The City finds and declares that substantial evidence for each and every finding made herein is contained in the Draft EIR, Final EIR, Errata to the Final EIR, technical studies, and other CEQA related materials, the administrative record, staff reports, conditions of approval, information provided by the Applicant, each and all of which are incorporated herein by this reference. Moreover, the City finds that where more than one reason exists for any finding, each reason independently supports such finding, and that any reason in support of a given finding individually constitutes a sufficient basis for that finding.

3.11 Relationship of Findings to EIR

These Findings are based on the most current information available. Accordingly, to the extent there are any apparent conflicts of inconsistencies between the Draft EIR and the Final EIR (including the Errata to the Final EIR), on the one hand, and these Findings, on the other, these Findings shall control and the Draft EIR and Final EIR or both, as the case may be, are hereby amended as set forth in these Findings.

3.12 Project Conditions of Approval

Each of the PDFs and mitigation measures referenced in these Findings and the MMRP shall be conditions of approval to be monitored and enforced by the City and other governmental agencies as set forth in the Mitigation Monitoring and Reporting Program. To the extent feasible, each of the other findings and conditions of approval made by or adopted by the City in connection with Alternative 3 are also incorporated herein by this reference.

3.13 Custodian of Documents

The custodian of the documents or other material which constitutes the record of proceedings upon which the City's decision is based is the City of Carson, located at 701 East Carson Street, Carson, California 90745.

4 References

APA (American Planning Association). 2011. Planning for Wind Energy. https://planning-org-uploaded-media.s3.amazonaws.com/legacy_resources/research/wind/pdf/pas566.pdf

CAL FIRE (California Department of Forestry and Fire Services). 2020. "Fire Hazard Severity Zone Viewer" [interactive map]. Accessed July 1, 2021. http://egis.fire.ca.gov/FHSZ/.

CalRecycle. 2021a "SWIS Facility Site Summary: Simi Valley Landfill and Recycling Center (56-AA-0007)." Accessed August 11, 2021. https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/1001.

CalRecycle. 2021b. "SWIS Facility Site Summary: El Sobrante Landfill (33-AA-0217)." Accessed August 11, 2021. https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/2402.

CalRecycle. 2021c. "SWIS Facility Site Summary: Lancaster Landfill and Recycling Center (19-AA-0050)." Accessed August 11, 2021. https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/1035.

Caltrans (California Department of Transportation). 2020a. Transportation and Construction Vibration Manual. April 2020.

Caltrans. 2021. "Scenic Highways: California State Scenic Highways." Accessed January 2022. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

Cal Water Services (California Water Services). 2021. *2020 Urban Water Management Plan*. June 2021.

CAPCOA (California Air Pollution Control Officers Association). 2017. *California Emissions Estimator Model (CalEEMod) User's Guide Version 2016.3.2.* Prepared by Trinity Consultants and the California Air Districts. November 2017. http://www.caleemod.com/.

CDE (California Department of Education). 2020. "Data Quest" [web search]. Accessed January 19, 2021. https://dq.cde.ca.gov/dataquest/page2.asp?level=School&subject=Enrollment&submit1=Submit.

CEC. 2018a. *California Energy Demand 2018-2030 Revised Forecast*, February 19, 2018.

CEC. 2018b. "2019 Building Energy Efficiency Standards: Frequently Asked Questions" [fact sheet]. March 2018. Accessed June 29, 2021. https://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf.

City of Carson. 2002. *City of Carson General Plan Environmental Impact Report: Volume II*. SCH no. 2001091120. Public Review Draft. Prepared by RBF Consulting. October 30, 2002. Accessed July 1, 2021 . http://ci.carson.ca.us/content/files/pdfs/planning/generalplan/EIR.pdf.

City of Carson. 2004. *City of Carson General Plan*. Adopted 2004. Accessed January 2022. https://ci.carson.ca.us/communitydevelopment/generalplan.aspx.

City of Carson. 2015. City of Carson General Plan –Land Use [map]. Scale not given. Printed August 5, 2015. Accessed May 30, 2021. http://ci.carson.ca.us/content/files/pdfs/GIS/mapgallery/GeneralPlan24x36.pdf.

City of Carson. 2018. Existing Conditions Report. Prepared by Dyett and Bhatia, with Fehr and Peers and Environmental Science Associates. January 2018 (Volume I) and May 2018 (Volume II). Accessed January 2022. https://static1.squarespace.com/static/5991f4e96a4963f2e46af74d/t/5cabb85dc83025d6b439f7af/1554757740866/Carson2040_ECR+Volume+2+Revised_05032018_compressed.pdf.

City of Carson. 2021a. "Parks and Recreation." Accessed September 15, 2021. http://ci.carson.ca.us/communityservices/Parks_Rec.aspx.

County of Los Angeles. 2014. *Final Environmental Impact Report: Los Angeles County General Plan Update*. Prepared by PlaceWorks. March 2015. Accessed January 19, 2021. https://planning.lacounty.gov/assets/upl/project/gp_2035_lac-gpu-final-eir-final.pdf.

County of Los Angeles. 2015. *Los Angeles County General Plan*. Adopted October 6, 2015. Accessed January 2022. https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan.pdf.

DOC (California Department of Conservation). 2018. The Williamson Act Status Report 2016-17. Released 2018. Accessed July 1, 2021 https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf.

DOC. 2020. "California Important Farmland Finder" [interactive map]. Accessed July 1, 2021. https://maps.conservation.ca.gov/dlrp/ciff/.

FTA (Federal Transit Administration). 2018. Transit Noise and Vibration Impact Assessment Manual. September 2018.

ICCT (International Council on Clean Transportation). 2021, "US: Nonroad: Emissions." Accessed February 22, 2021.https://www.transportpolicy.net/standard/us-nonroad-emissions.

LACFCD (Los Angeles County Flood Control District) . 2021. "Dominguez Channel Levee Certification: Preliminary Special Flood Hazard Area" [map]. Thomas Bros. Maps. Accessed August 25, 2021. http://dpw.lacounty.gov/wmd/PreFloodCommunity_DomChnl_2x3.pdf.

LAUSD (Los Angeles Unified School District). 2015. "Los Angeles Unified School District: Board of Education District 7" [map]. June 9, 2015. Scale not given. https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=22654&dataid=24425&FileName=BoardDistrict7.pdf.

LACSD (Los Angeles County Sanitation Districts). 2021. "Plant Performance: 2019 Annual Performance Data." Accessed August 19, 2021. https://www.lacsd.org/services/wastewatersewage/facilities/jwpcp/performance/default.asp.

LAUSD. 2019. "Resident School Identifier" [interactive map]. Accessed August 11, 2021. https://rsi.lausd.net/ResidentSchoolIdentifier/.

LAUSD. 2020. *2020 Developer Fee Justification Study: Los Angeles School District*. Schoolworks, Inc. March 2020. Accessed January 19, 2021. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf.

Los Angeles County Library. 2020. "About the Library." Accessed January 19, 2021. https://lacountylibrary.org/aboutus/.

Los Angeles County Public Works. 2020. Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF.

NREL (National Renewable Energy Laboratory). 2015. Small Wind Site Assessment Guidelines. https://www.nrel.gov/docs/fy15osti/63696.pdf

OFR (National Archives and Records Administration's Office of the Federal Register, Electronic Code of Federal Regulations). 2021. *Title 40: Protection of Environment Part 1039 – Control of emissions from new and in-use nonroad compression-ignition engines*, Last updated August 19, 2021. Accessed February 22, 2021. https://www.ecfr.gov/cgi-bin/text-idx?SID=94ae9cf9f8cb63bc378d54fc4f8ddff6&mc=true&node=pt40.36.1039&rgn=div5.

OPR (Office of Planning and Research). 2018. *Final Statement of Reasons for Regulatory Action Amendments to the State CEQA Guidelines*. November 2018. Accessed June 2021.

RCLCO Real Estate Consulting. 2020. Household Size Analysis for New Apartment Development in Carson, California. August 2020.

Pray, Richard. 2016. 2017 *National Construction Estimato*r. Carlsbad: Craftsman Book Company. November 2016.

SCAG (Southern California Association of Governments). 2001. Employment Density Study Summary Report. Accessed January 20, 2021. http://www.mwcog.org/file.aspx?A=QTTITR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D.

SCAG. 2020a. "Technical Report - Current Context: Demographics & Growth Forecast." in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. Adopted September 2020. Accessed January 20, 2021. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579.

SCAG. 2020b. Pre-Certified Local Housing Data for the City of Carson. August 2020. Accessed January 20, 2021. https://scag.ca.gov/sites/main/files/file-attachments/carson_he_0920.pdf?1603168715.

SCAQMD. 2016a. *Regulation XI Source Specific Standards*, Amended February 5, 2016. Accessed June 29, 2021.http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf?sfvrsn=15.

SCE (Southern California Edison). 2015. Rates & Pricing Choices: General Service/Industrial Rates. October 19, 2015. https://library.sce.com/content/dam/sce-doclib/public/regulatory/tariff/electric/schedules/general-service-&-industrial-rates/ELECTRIC_SCHEDULES_GS-1.pdf.

Sullivan, J.L., Baker, R.E., Boyer, B.A., Hammerle, R.H., Kenney, T.E., Muniz, L., Wallington, T.J., 2004. *CO_2 Emission Benefit of Diesel (versus Gasoline) Powered Vehicles*. Published on web March 13, 2004, Accessed February 22, 2021. https://pubs.acs.org/doi/pdf/10.1021/es034928d.

USFWS (U.S. Fish and Wildlife Service). 2021. "National Wetlands Inventory, Wetlands Mapper." Accessed July 1, 2021. http://www.fws.gov/wetlands/Data/Mapper.html.

Weatherspark. 2022. Climate and Average Weather Year Round at Los Angeles International Airport. https://weatherspark.com/y/145341/Average-Weather-at-Los-Angeles-International-Airport-California-United-States-Year-Round.