

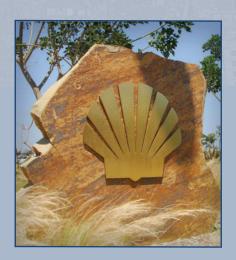
March 2021



Shell Compressed Natural Gas Dispensing Station Project

Initial Study/Mitigated Negative Declaration





Prepared for City of Carson

Prepared by **DUDEK**

DRAFT

Initial Study/Mitigated Negative Declaration Shell Compressed Natural Gas Dispensing Station

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City of Carson

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MARCH 2021

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AQMP	Air Quality Management Plan
BMP	best management practice
BSA	biological survey area
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CAP	Climate Action Plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CH ₄	methane
City	City of Carson
CNEL	Community Noise Equivalent Level
CNG	Compressed Natural Gas
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
dB	decibel
dBA	A-weighted decibel
DOR	Design Overlay Review
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
GWP	global warming potential
HFC	hydrofluorocarbon
HFSZ	High Fire Severity Zone
1	Interstate
IS	Initial Study
Leq	energy equivalent level
LST	localized significance threshold
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MT	metric ton
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NF3	nitrogen trifluoride
NO ₂	nitrogen dioxide
NOx	oxides of nitrogen
03	ozone
PFC	perfluorocarbon
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
PM10	particulate matter with an aerodynamic diameter less than or equal to 10 microns

Acronym/Abbreviation	Definition
PRC	California Public Resources Code
project	Shell Compressed Natural Gas (CNG) Dispensing Station Project
RCNM	Roadway Construction Noise Model
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SBCCG	South Bay Cities Council of Governments
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SEA	Significant Ecological Area
SF ₆	sulfur hexafluoride
Shell	Equilon Enterprises LLC d/b/a Shell Oil Products US
SO ₂	sulfur dioxide
SOx	sulfur oxides
SR	State Route
TAC	toxic air contaminant
VOC	volatile organic compound

1.1 Project Overview

Equilon Enterprises LLC d/b/a Shell Oil Products US (Shell or project applicant), in its capacity as owner and operator of the Shell Carson Distribution Terminal, proposes to implement the Shell Compressed Natural Gas (CNG) Dispensing Station Project (project), which would involve the installation a 4-inch-diameter natural gas pipeline, three CNG dispensers, and a CNG system compound at the existing Shell Carson Distribution Station to enable the conversion of seven delivery trucks from diesel fuel to renewable CNG fuel.

The project is subject to analysis pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the City of Carson (City) is the lead agency with principal responsibility for considering the project for approval (14 California Code of Regulations [CCR] 15000 et seq.).

1.2 California Environmental Quality Act Compliance

CEQA, a statewide environmental law contained in California Public Resources Code (PRC) Sections 21000–21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment (PRC Section 21000 et seq.). The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the project. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an Environmental Impact Report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

In accordance with the CEQA Guidelines, the City, as the lead agency, has prepared an Initial Study (IS) to evaluate potential environmental effects and to determine whether an EIR, a Negative Declaration, or a Mitigated Negative Declaration (MND) should be prepared for the project. CEQA Guidelines Section 15070(b) provides that an MND should be prepared for a project when the IS has identified potentially significant environmental impacts associated with the project, but (1) revisions to the project's plans or proposals made or agreed to by the applicant before release of an MND for public review would avoid or mitigate environmental effects to a point where no significant effect on the environment would occur and (2) there is no substantial evidence in the record before the public agency that the project, as revised, may have a significant effect on the environment. The IS determined that implementation of the project would result in no impacts or less-than-significant impacts with incorporation of mitigation. Therefore, the City has prepared an MND for the project.

1.3 Preparation and Processing of this Initial Study

The City's Community Development Department, Planning Division, directed and supervised preparation of this IS/MND. Although prepared with assistance from the consulting firm Dudek, the content contained and the conclusions drawn within this IS/MND reflect the independent judgment of the City.

1.4 Initial Study Checklist

Dudek, under the City's guidance, prepared the project's Environmental Checklist (i.e., IS) per CEQA Guidelines Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist can be found in Section 3, Initial Study Checklist, of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 provide an explanation and discussion of each significance determination made in the checklist for the project.

For this IS/MND, one of the following four responses is possible for each environmental issue area:

- 1. Potentially Significant Impact
- 2. Less-than-Significant Impact with Mitigation Incorporated
- 3. Less-than-Significant Impact
- 4. No Impact

The checklist and accompanying explanations of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project. In doing so, the City determined that no further environmental review was necessary for the project.

1.5 Public Review Process

As specified by the CEQA Guidelines, the project's Notice of Intent was circulated for a 30-day public review period (14 CCR 15082[b]) to agencies with concern or with jurisdiction over resources affected by the project. The Notice of Intent has been provided to the Clerk of the County of Los Angeles, responsible agencies, and interested organizations and individuals.

Reviewers of the IS/MND are given a 30-day public review period to prepare written comments on the IS/MND. During the public review period, the IS/MND, including the technical appendices, is available for review at the following locations:

• City of Carson website: http://ci.carson.ca.us/communitydevelopment/planningprojects.aspx

In reviewing the IS/MND, affected public agencies and interested members of the public should focus on the adequacy of the document in identifying and analyzing the potential environmental impacts. Comments on the IS/MND and the analysis contained herein may be sent to the following:

Max Castillo, Assistant Planner City of Carson Community Development Department, Planning Division 701 East Carson Street Carson, California 90745 310.952.1761, ext. 1317 mcastillo@carson.ca.us

2 Project Description

2.1 Project Overview

The project would involve construction of a CNG dispensing station and associated aboveground pipeline and equipment at the existing Shell Carson Distribution Terminal located within the Shell Carson Distribution Complex.

2.2 Project Location

The project site is located within the Shell Carson Distribution Complex, located at 20945 S. Wilmington Avenue within the central portion of the City. The Shell Carson Distribution Complex is located between Del Amo Boulevard to the north, Wilmington Avenue to the east, Dominguez Street to the south, and Annalee Avenue and Chico Street to the west (Figure 1, Project Location). The facility is bordered by residential, light manufacturing, and commercial uses, with Interstate (I) 405 approximately 850 feet west at the closest point.

Regional roadway access to the project site is provided by I-405, which runs north/south and is located west of the Shell Carson Distribution Complex; California State Route (SR) 91 that runs east/west and is located less than 2 miles to the north; and I-710, located approximately 1.65 miles east. Local roadway access is provided via Del Amo Boulevard, S. Wilmington Avenue, and E. Carson Street.

More specifically, the project would be located at an existing ethanol loading terminal within the western portion of the Shell Carson Distribution Complex.

2.3 Environmental Setting

City of Carson

The City is approximately 19 square miles in the South Bay/Harbor region of the County. Generally, the City is an urban community with a broad mix of land uses, including housing, commercial, office, industrial park, open space, and public-serving uses. The City is primarily built-out and relatively flat, with most elevations ranging from 20 to 40 feet. The northwest and southeast portions of the City are generally industrial uses. Residential uses are generally located on the southwest and northeast portions of the City. Commercial uses are concentrated along Interstate (I) 405.

Carson is surrounded by the City of Los Angeles to the northwest, south, and southeast. The City of Compton is adjacent to the northeast, and the City of Long Beach is adjacent to the east. The City of Carson is also close to the Ports of Los Angeles and Long Beach, approximately 2 to 3 miles to the south. There are four freeways that provide direct access to Carson: I-405 (San Diego Freeway), which bisects the City in an east–west direction; I-710 (Long Beach Freeway), which forms a portion of the eastern border of Carson; State Route 91 (Redondo Beach/Artesia Freeway) in the northern portion of the City; and I-110 (Harbor Freeway), which forms much of the western border of the City (City of Carson 2002).

Project Site

The Shell Carson Distribution Complex was originally built in 1924 as a refinery to support the growing manufacturing industry, and it helped spark an increase in jobs within the community during World War II. In 1992, the refinery was decommissioned and dismantled, and today the 448-acre facility operates as a fuel distribution facility. It receives and distributes petroleum and renewable fuels throughout Southern California via pipeline and truck deliveries.

The project would be located at the existing ethanol loading terminal. This terminal currently operates under Design Overlay Review (DOR) Number 764-01 granted by the City. The project site is zoned Manufacturing, Heavy (MH-D) with a General Plan land use designation of Heavy Industrial (City of Carson 2004a).

The facility is bordered by residential, light manufacturing, and commercial uses, with I-405 approximately 850 feet west at the closest point.

2.4 Proposed Project

The project would involve installation of a CNG dispensing station at an existing ethanol loading facility to enable the conversion of seven delivery trucks from diesel fuel to renewable CNG fuel. The CNG dispensing station would include three CNG dispensers, an approximately 2,700-square-foot, 20-foot-tall canopy over the dispensers, and a CNG system compound that would include two compressors, one dryer, and three CNG storage tanks. Approximately 16,220 square feet of new concrete and asphalt would be laid to support the CNG system compound and new dispensers. The dispensing station would be configured to facilitate installation of a third CNG dispenser in the future (as a conservative measure, this dispenser is accounted for in this analysis). LED lights would be recessed into the canopy and would provide lighting over the dispensers during nighttime hours. The CNG facility would be supported by a new, approximately 3,200-foot-long natural gas pipeline that would run for approximately 500 feet in a north/south direction from the ethanol loading facility prior to running approximately 2,700 feet west where it would connect to an existing natural gas pipeline at the Shell Carson Distribution Complex's eastern boundary (Figure 2, Site Plan). Existing site photos and typical equipment are depicted on Figure 3, Existing Site Photos and Typical Equipment Photos.

The new natural gas pipeline would be installed on an existing aboveground pipe rack, except where it would cross two on-site driveways where it would be placed in a precast trench with a grate cover, and for approximately 500 feet of the north/south segment where a new aboveground pipe rack would be constructed. The new aboveground pipe rack would be similar to the existing aboveground pipe rack and be constructed of 12- to 18-inch concrete supports spaced approximately 15 to 25 feet apart.

Operation

Once operational, the project would enable the conversion of seven ethanol delivery trucks from diesel fuel to renewable CNG fuel. Operation of the dispensing station would require power to run two 250-horsepower compressors when trucks are being fueled with CNG. Routine daily maintenance in the form of visual inspections and maintenance at 400-, 2,000-, and 4,000-hour intervals would be required to ensure that the equipment is functioning properly and efficiently.

The project would be designed in compliance with requirements set forth in DOR 764-01. The ethanol truck traffic to and from the terminal is regulated by the DOR, and the current limit is a maximum of 210 trucks per day, with a

maximum annual average of 195 trucks per day. Additionally, all ethanol tanker trucks are mandated to exit the facility onto Wilmington Avenue heading north to Del Amo Boulevard and then east to Alameda Street, avoiding residential areas. Because the project would only enable the conversion of exiting delivery trucks from diesel fuel to renewable CNG fuel, and because the DOR limits the number of trucks that can enter the facility, the project would not increase the number of trucks coming to the project site on a daily basis.

Construction

Project construction would commence in or around May 2021 and would last approximately 4 months. Construction activities would require the use of several types of equipment, including approximately three trucks, one backhoe, two Sideboom tractors, two cranes, four welding machines, two excavators, one skidsteer, one dump truck, one compactor, one directional drilling rig or support truck, and concrete mix trucks. It is anticipated that most of this equipment would be staged on site for the duration of construction, with approximately 10 pick-up trucks traveling to and from the project site each day.

Additionally, it is anticipated that typically there would be 13 construction workers on site per day, and during peak construction there could be as many as 24 construction workers on site per day. The pipeline would be delivered via a road tractor over a 5-day period, and the concrete would be poured via four to 10 trucks per day over a 4-day period. During the civil import and excavation portion of the project there would be approximately 30 to 40 trips over a 1- to 2-week period.

Designated delivery and haul routes for the project would be consistent with those currently used for fueling activities and other projects. Trucks and equipment would use Wilmington Avenue and either I-405 or SR-91 for these trips.

The maximum excavation for construction would be 6 to 8 feet for canopy footings. The CNG compound would require approximately 1 to 2 feet of excavation, and other project components would require approximately 4 feet of excavation. There would not be any tree or vegetation removal required as part of project construction.

Construction staging and laydown would occur in the unpaved area east of the existing and proposed CNG dispenser drive lane.

2.5 Project Approvals

Implementation of the project would involve the approval of a Conditional Use Permit (CUP 1106-2020) in accordance with Section 9172.21 of the Carson Municipal Code; and approval of DOR 1842-2020 for a project within the Design Overlay District having a construction valuation of \$50,000 or more.

INTENTIONALLY LEFT BLANK

1. Project title:

Shell Compressed Natural Gas (CNG) Dispensing Station Project

2. Lead agency name and address:

City of Carson Community Development Department, Planning Division 701 East Carson Street Carson, California 90745

3. Contact person and phone number:

Max Castillo, Assistant Planner 310.952.1761, ext. 1317 mcastillo@carson.ca.us

4. Project location:

Shell Carson Distribution Complex 20945 South Wilmington Avenue Carson California 90745

5. Project sponsor's name and address:

Equilon Enterprises LLC d/b/a Shell Oil Products US 20945 South Wilmington Avenue Carson, California 90810

6. General plan designation:

Heavy Industrial

7. Zoning:

MH-D (Manufacturing, Heavy)

8. Description of project.

The project would involve construction of a CNG dispensing station and associated aboveground pipeline and equipment at the existing Shell Carson Distribution Terminal located within the Shell Carson Distribution Complex.

Refer to Section 2.4, Proposed Project, for additional details.

9. Surrounding land uses and setting:

The project would be located within the Shell Carson Distribution Complex, which actively receives and distributes petroleum and renewable fuels throughout the Southern California region via pipelines and trucks delivery. The Shell Carson Distribution Complex is located between Del Amo Boulevard to the north, Wilmington Avenue to the east, Dominguez Street to the south, and Annalee Avenue and Chico Street to the west.

The facility is bordered by residential, light manufacturing, and commercial uses, with I-405 approximately 850 feet west at the closest point.

10. Other public agencies whose approval is required:

No discretionary approvals from other public agencies are required.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes. Refer to Section 3.18, Tribal Cultural Resources, for additional details.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

Aesthetics	Agriculture and Forestry Resources	Air Quality
Biological Resources	Cultural Resources	Energy
Geology and Soils	Greenhouse Gas Emissions	Hazards and Hazardous Materials
Hydrology and Water Quality	Land Use and Planning	Mineral Resources
Noise	Population and Housing	Public Services
Recreation	Transportation	Tribal Cultural Resources
Utilities and Service Systems	Wildfire	Mandatory Findings of Significance

Determination

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Max Castillo

Signature

3/4/21

Date

Evaluation of Environmental Impacts

- 1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
- 4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Ι.	AESTHETICS - Except as provided in Public Resour	rces Code Section	21099, would the pr	oject:	
a)	Have a substantial adverse effect on a scenic vista?				\boxtimes
b)	Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
C)	In non-urbanized areas, 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?				
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. The City of Carson's General Plan does not identify any scenic vistas within the City, and spaces like undeveloped hillsides or prominent landforms, which are traditionally classified as scenic vistas, are not located within the vicinity of the project site (City of Carson 2004b). Moreover, the project would involve the installation of a CNG dispensing station within the greater Shell Carson Distribution Complex, which is an industrial facility that contains utilitarian petroleum storage and distribution equipment. The facility's perimeter is bound by security fencing with vinyl slats to screen views from public roadways.

The new CNG compound and dispensing station would be located adjacent to the existing ethanol loading racks, which are located within the central portion of the Shell Carson Distribution Complex and are not presently visible from public vantage points due to the presence of intervening equipment and structures along the Shell Carson Distribution Complex's perimeter. Due to the low height of the project components, presence of intervening features, and existing perimeter screening around the Shell Carson Distribution Complex, the project would not be visible from public viewpoints. Therefore, no impacts associated with a scenic vista would occur.

b) Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The project site is not located in the vicinity of a state scenic highway (Caltrans 2021). The nearest eligible state scenic highway is a portion of SR-1, located approximately 7 miles southeast of the project site. Due to the intervening urban environment and natural topography located between the project site and this eligible state scenic highway, development of the project would occur outside of the viewshed of this, and any other, designated scenic highway. Therefore, no impacts associated with state scenic highways 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?

No Impact. PRC Section 20171 defines an "urbanized area" as "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." As of January 1, 2020, the California Department of Finance estimated the population of the City of Carson to be 93,108 persons (DOF 2020). The City is adjacent to the City of Los Angeles, which has an estimated population of 4,010,684 persons (DOF 2020). Together, the City of Carson's and City of Los Angeles' population exceeds 100,000 persons, and thus, the project site is located within an urbanized area. Therefore, regarding the determination of significance under this threshold, the project would be considered to result in a significant adverse impact if the project design would conflict with applicable zoning and other regulations governing scenic quality.

To ensure that both current and future development within the City is designed and constructed to conform to existing visual character and quality of the surrounding built environment, the City's Municipal Code includes design standards related to building size, height, and setback, as well as landscaping, signage, and other visual considerations for each zoning district. These design standards help ensure that adjacent land uses are visually consistent with one another and their surroundings, while reducing the potential for aesthetic conflict.

The project would be subject to the applicable development standards of the Heavy Manufacturing (MH-D) zone. The City reviews design specifications of all development proposals to ensure compliance with all applicable provisions set forth by the Municipal Code. As part of the City's development review process, project plans are reviewed by City staff to ensure that projects conform to the Municipal Code and promote the visual character and quality of the surrounding area. The City has reviewed the project plans in detail and determined that the project would not conflict with applicable design regulations within the Municipal Code governing scenic quality.

Moreover, as discussed in Section 3.1(a), due to the low height of the project components, presence of intervening features, and existing perimeter screening around the Shell Carson Distribution Complex, the project would not be visible from public viewpoints and would not affect the existing visual character or quality of public views of the site or its surroundings. Overall, given the project's minimal visibility and the project's required consistency with the City's Municipal Code, the project would not conflict with applicable

zoning governing scenic quality or degrade the existing visual character of the site. Therefore, no impacts associated with visual character and quality would occur.

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

Less-than-Significant Impact. Construction activities are only anticipated to take place during daylight hours. Therefore, construction activities would not create a substantial new source of light. New lighting would be provided as necessary for operation of the project in accordance with applicable safety standards, including lighting associated with the CNG canopy. This lighting would be consistent with existing lighting, would be downward facing and focused on the CNG dispensers, and is not expected to be distinguishable from existing lighting when viewed from outside the Shell Carson Distribution Complex. The project would not introduce substantial new sources of light that would substantially affect day or nighttime views. Therefore, no impacts associate with light and glare would occur.

3.2 Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:					
a)	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)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
C)	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)	Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) 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?				

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?

No Impact. As indicated on the map of Los Angeles County Important Farmland developed by the California Department of Conservation for the Farmland Mapping and Monitoring Program, the project site and surrounding areas is located on and surrounded by "Urban Built-Up Land" (CDC 2021). Urban and Built-Up Land generally includes land uses such as residential, commercial, industrial, institutional facilities, and other urban land uses. Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and no impact would occur.

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

No Impact. The project site is not located on Williamson Act contract land. The project site is zoned Heavy Industrial. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

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))?

No Impact. According to the City's Zoning Map, the project site is not located on or adjacent to forestland, timberland, or timberland zoned Timberland Production (City of Carson 2004a). Therefore, the project would not conflict with existing zoning for forest land or timberland, and no impact would occur.

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

No Impact. The project site is not currently designated or used for forestry resources. Therefore, the project would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

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?

No Impact. The project site and its immediate surroundings are zoned as Heavy Industrial and located within a largely developed area in the City. The project would not result in the conversion of agricultural or

forest land. None of the surrounding lands in the vicinity of the project site are used for agriculture or are forest lands. Therefore, the project would not result in the direct or indirect conversion of agricultural uses or forest land, and no impact would occur.

3.3 Air Quality

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III.	AIR QUALITY – Where available, the significan management district or air pollution control d determinations. Would the project:			•	у
a)	Conflict with or obstruct implementation of the applicable air quality plan?			\boxtimes	
b)	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?				
C)	Expose sensitive receptors to substantial pollutant concentrations?			\boxtimes	
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			\boxtimes	

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

Less-than-Significant Impact. The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board in March 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding is to determine whether a project is inconsistent with the assumptions and objectives of regional air quality plans and thus would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP or increments based on the year of
 project buildout and phase.

To address the first criterion regarding the project's potential to result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP, project-generated criteria air pollutant emissions were estimated and analyzed for significance and are addressed in Section 3.3(b). Detailed results of this analysis are included in Appendix A, Air Quality, GHG and Energy Emissions Inputs and Outputs. As presented in Section 3.3(b), project construction would not generate criteria air pollutant emissions that would exceed the SCAQMD thresholds, and the project is not anticipated to generate operational criteria air pollutant emissions.

The second criterion regarding the project's potential to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and potential to generate population growth. In general, projects are considered consistent with, and therefore not conflicting with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (SCAG 2016), which is based on general plans for cities and counties in the SCAB, for development of the AQMP emissions inventory (SCAQMD 2017).¹ The SCAG 2016 RTP/SCS and associated Regional Growth Forecast are generally consistent with local plans; therefore, the 2016 AQMP is generally consistent with local government plans.

As discussed in Section 1.1, Project Overview, of this IS/MND, the project would occur entirely within the existing footprint of the Shell Carson Distribution Terminal. The addition of a CNG fueling station to replace the equivalent of seven diesel trucks would not change or affect the existing zoning or land use designations in the project area. Accordingly, the project is consistent with the SCAG RTP/SCS forecasts used in SCAQMD AQMP development.

In summary, based on the considerations presented for the two criteria, impacts relating to the project's potential to conflict with or obstruct implementation of the applicable AQMP would be less than significant.

¹ Information necessary to produce the emission inventory for the SCAB is obtained from SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), the California Department of Transportation (Caltrans), and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its travel demand model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in its 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

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?

Less-than-Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

A quantitative analysis was conducted to determine whether proposed construction activities would result in a cumulatively considerable net increase in emissions of criteria air pollutants for which the SCAB is designated as nonattainment under the NAAQS or CAAQS. Criteria air pollutants include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM₁₀), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM_{2.5}), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NOx), which are important because they are precursors to O₃, as well as CO, sulfur oxides (SOx), PM₁₀, and PM_{2.5}.

Regarding NAAQS and CAAQS attainment status,² the SCAB is designated as a nonattainment area for national and state O₃ and PM_{2.5} standards (CARB 2017; EPA 2017). The SCAB is designated as a nonattainment area for state PM₁₀ standards; however, it is designated as an attainment area for national PM₁₀ standards. The SCAB nonattainment status of O₃, PM₁₀, and PM_{2.5} standards is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. The SCAB is designated as an attainment area for national and state NO₂, CO, and SO₂ standards. Although the SCAB has been designated as partial nonattainment (Los Angeles County) for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.³

Appendix G of the CEQA Guidelines indicates that, where available, the significance criteria established by the applicable air district may be relied upon to determine whether a project would have a significant impact on air quality. The SCAQMD has established Air Quality Significance Thresholds, as revised in March 2015, which set forth quantitative emissions significance thresholds below which a project would not have a significant impact on ambient air quality (SCAQMD 2015). The quantitative air quality analysis provided herein applies the SCAQMD thresholds to determine the potential for the project to result in a significant impact under CEQA. The SCAQMD mass daily construction thresholds are as follows: 75 pounds per day for VOCs, 100 pounds per day for NO_x, 550 pounds per day for CO, 150 pounds per day for SO_x, 150 pounds per day for PM₁₀, and 55 pounds per day for PM_{2.5}.

² An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. The NAAQS and CAAQS are set by the Environmental Protection Agency and CARB, respectively, for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. Attainment = meets the standards; attainment/maintenance = achieve the standards after a nonattainment designation; nonattainment = does not meet the standards.

³ Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

Construction Emissions

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment and soil disturbance) and off-site sources (i.e., on-road haul trucks, delivery trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions for construction of the project. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction activities from a variety of land use projects, such as residential, commercial, and industrial facilities. CalEEMod input parameters, including the land use type used to represent the project and size, construction schedule, and anti cipated construction equipment utilization, were based on information provided by the City and default model assumptions when project-specific data was not available.

For the purpose of conservatively estimating project emissions, it is assumed that construction of the project would start in May 2021⁴ and would last approximately 4 months. The construction phasing schedule and duration, vehicle trip assumptions, and construction equipment mix used for estimating the project-generated emissions are shown in Table 1.

	One-Way Ve	ehicle Trips		Equipment			
Construction Phase	Average Daily Workers	Average Daily Vendor Trucks	Total Haul Trucks	Туре	Quantity	Usage Hours	
Pipeline	26	20	40	Crane	1	8	
Installation				Tractor/Loader/Backhoe	1	8	
				Welders	4	8	
CNG	26	12	0	Crane	1	8	
Compound				Excavator	1	8	
Installation				Welders	2	8	
				Skid steer Loader	1	8	
Paving	26	12	40	Concrete Mix Trucks	2	8	
U				Compactor	2	8	
				Tractor/Loader/Backhoes	2	8	
Architectural Coating	0	0	0	Air Compressor	1	8	

Table 1. Construction Scenario Assumptions

Source: See Appendix A for details.

Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5}. PM₁₀ and PM_{2.5} emissions would also be generated by

⁴ The analysis assumes a construction start date of April 2021, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil. It is anticipated that any required grading would be balanced on site without the need to import or export earthwork material. The project would be required to comply with SCAQMD Rule 403 to control dust emissions during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active grading areas two times per day, with additional watering depending on weather conditions.

Estimated maximum daily construction criteria air pollutant emissions from all on-site and off-site emission sources is provided in Table 2.

	VOC	NOx	CO	SOx	PM ₁₀ ^a	PM _{2.5} ^a
Year	Pounds per Day					
2021	6.74	33.66	31.69	0.07	2.60	1.66
SCAQMD Threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: SCAQMD 2015.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

See Appendix A for detailed results.

a These estimates reflect control of fugitive dust (watering two times daily) required by SCAQMD Rule 403 (SCAQMD 2005).

As shown in Table 2, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} during project construction and impacts would be less than significant.

Operational Emissions

Operation of the project would produce VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions from stationary sources, area sources, and use of consumer products. Emissions of criteria air pollutants were estimated using CalEEMod. Project buildout was assumed to occur in 2022.

The project was assumed to generate a net-zero number of daily trips. Therefore, no emissions from mobile sources were estimated. CalEEMod was used to estimate emissions from the area sources, which include use of consumer products and architectural coatings for maintenance of structures and parking areas. The estimated operational area-source emissions were based on land use defaults of the project. CalEEMod was also used to calculate emissions associated with the two 250-horsepower CNG compressors. It was conservatively assumed that the compressors would operate on site for 8 hours a day.

Table 3 presents the maximum daily emissions associated with operation of the project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Complete details of the emissions calculations are provided in Appendix A.

Table 3. Estimated Daily Maximum Operational Emissions (2022)

	VOCs	ΝΟχ	CO	SOx	PM 10	PM 2.5	
Emissions Source	Pounds per Day						
Area	0.02	0.00	<0.01	0.00	0.00	0.00	
Energy	0.00	0.00	0.00	0.00	0.00	0.00	

	VOCs	NOx	CO	SOx	PM 10	PM 2.5	
Emissions Source	Pounds per Day						
Mobile	0.00	0.00	0.00	0.00	0.00	0.00	
Off-Road Equipment	1.08	6.84	4.66	0.03	0.22	0.22	
Total Emissions	1.10	6.84	4.66	0.03	0.22	0.22	
SCAQMD Pollutant Threshold	55	55	550	150	150	55	
Threshold Exceeded?	No	No	No	No	No	No	

Table 3. Estimated Daily Maximum Operational Emissions (2022)

Source: See Appendix A for complete results.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

As shown in Table 3, the total net daily emissions from operation of the project would not exceed the SCAQMD operational significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}, and impacts would be less than significant.

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. In considering cumulative impacts from the project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for the CAAQS and NAAQS. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

The SCAB is a nonattainment area for O₃ and PM_{2.5} under the NAAQS, and is a nonattainment area for O₃, PM₁₀, and PM_{2.5} under the CAAQS. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operation of the project would generate VOC and NO_x emissions (which are precursors to O₃) and emissions of PM₁₀ and PM_{2.5}. However, as indicated in Tables 3 and 4, project-generated construction and operational emissions would not exceed the SCAQMD emissions-based significance thresholds for VOC, NO_x, PM₁₀, or PM_{2.5}; therefore, the project would not cause a cumulatively significant impact.

Cumulative localized impacts could occur if construction of a project component were to occur concurrently with another project. Construction schedules for potential future projects near the planning area are currently unknown; therefore, potential construction impacts associated with two simultaneous projects are speculative. The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). However, air pollutant emissions associated with construction activities would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM₁₀ and PM_{2.5} construction emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in SCAQMD. The maximum daily PM₁₀ and PM_{2.5} emissions would not exceed the significance thresholds during project construction activities, although fugitive dust and vehicle and equipment exhaust generated during project construction would contribute

to SCAB's nonattainment designation for PM_{10} and $PM_{2.5}$; however, this contribution would not be considered cumulatively considerable.

Furthermore, the project would not conflict with growth assumptions in the SCAQMD 2016 AQMP, which addresses the cumulative emissions in the SCAB. In 2026, upon buildout of the project, the project would be consistent at a regional level with the underlying growth forecasts in the AQMP.

Based on the above considerations, the project would not result in a cumulatively considerable contribution to the nonattainment pollutants in the SCAB, and this impact would be less than significant.

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

Less-than-Significant Impact. Localized project impacts associated with construction criteria air pollutants emissions are assessed below.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, older adults, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The closest sensitive receptor land uses are residences located approximately 540 feet south of the project site.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of a project site as a result of construction activities. The project's impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2009). The project is located in Source Receptor Area 4 (South Costal Los Angeles County). The project's construction activities would occur over an area smaller than 1 acre; therefore, for the purposes of the LST analysis, emissions thresholds based on a 1-acre site were used, which was estimated using SCAQMD's Fact Sheet for Applying CalEEMod to Localized Significance Threshold (SCAQMD 2011). As mentioned previously, the closest sensitive receptors are residences located approximately 540 feet southeast of the project site. The closest receptor distance available in the SCAQMD LST Methodology is 100 meters (329 feet) and is what was assumed for this analysis.

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with construction equipment exhaust and dust-generating activities. The maximum daily on-site emissions generated during construction of the project is presented in Table 4 and compared to the SCAQMD LST criteria for Source Receptor Area 4 to determine whether project-generated on-site construction emissions would result in potential LST impacts.

	NO ₂	NO ₂ CO		PM _{2.5}		
Year	Pounds per Day (on site)					
2021	31.56	28.69	1.39	1.33		
SCAQMD LST Criteria	68	1,180	29	10		
Threshold Exceeded	No	No	No	No		

Table 4. Construction Localized Significance Thresholds Analysis

Source: SCAQMD 2009.

Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

See Appendix A for detailed results.

Localized significance thresholds are shown for a 1-acre project site corresponding to a distance to a sensitive receptor of 100 meters.

As shown in Table 4, proposed construction activities would not generate emissions in excess of sitespecific LSTs; therefore, localized project construction impacts would be less than significant.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited because CO disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections. Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots. During construction of the project, construction traffic would affect the intersections near the project site. However, project construction would be temporary and would not be a source of daily, long-term mobile-source emissions. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Finally, as discussed in Section 3.17, Transportation, of this IS/MND, transportation impacts would be less than significant. Furthermore, the project would allow for CNG-fueled trucks to replace existing diesel trucks, which would reduce CO emissions. Therefore, the project would not generate additional traffic volumes, and impacts related to CO hotspots would be less than significant.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. As discussed under the LST analysis, the nearest sensitive receptors to the project site are residences located adjacent to the site near residential neighborhoods.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment risk-assessment methodology (OEHHA 2015). In addition, some

TACs have non-carcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects.⁵ TACs that would potentially be emitted during construction activities associated with the project would be diesel particulate matter.

Diesel particulate matter emissions would be emitted from heavy equipment operations and heavy-duty trucks. Heavy-duty construction equipment is subject to a California Air Resources Board (CARB) Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. As described for the LST analysis, PM₁₀ and PM_{2.5} (representative of diesel particulate matter) exposure would be minimal. According to the Office of Environmental Health Hazard Assessment, health risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should also be limited to the period/duration of activities associated with a project. The duration of the project's construction period for the project would be approximately 4 months, after which construction-related TAC emissions would cease. Due to this relatively short period of exposure and minimal particulate emissions on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks.

Following completion of on-site construction activities, the project would not involve routine operational activities that would generate TAC emissions. Operation of the project would not result in any non-permitted direct emissions (e.g., those from a point source such as diesel generators). For the reasons previously described, the project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the project, and impacts would be less than significant.

Health Effects of Criteria Air Pollutants

Construction emissions of the project would not exceed the SCAQMD thresholds for any criteria air pollutants, including VOC, NO_x , CO, SO_x , PM_{10} , and $PM_{2.5}$.

Health effects associated with O_3 include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2019). VOCs and NOx are precursors to O_3 , for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind of the source location because of the time required for the photochemical reactions to occur. Further, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur, because exceedances of the O_3 NAAQS and CAAQS tend to occur between April and October when solar radiation is highest. Due to the lack of quantitative methods to assess this complex photochemistry, the holistic effect of a single project's emissions of O_3 precursors is speculative. Because the project would not exceed the SCAQMD thresholds, the project would not contribute to health effects associated with O_3 .

Health effects associated with NO_x include lung irritation and enhanced allergic responses (CARB 2019). Because project-related NO_x emissions would not exceed the SCAQMD mass daily thresholds, and because

⁵ Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various non-carcinogens from the project to published reference exposure levels that can cause adverse health effects.

the SCAB is a designated attainment area for NO₂ and the existing NO₂ concentrations in the area are well below the NAAQS and CAAQS standards, it is not anticipated that the project would cause an exceedance of the NAAQS and CAAQS for NO₂ or result in potential health effects associated with NO₂ and NO_x.

Health effects associated with CO include chest pain in patients with heart disease, headache, lightheadedness, and reduced mental alertness (CARB 2019). CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots was discussed previously and determined to be less than significant. Thus, the project's CO emissions would not contribute to significant health effects associated with CO.

Health effects associated with PM_{10} include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2019). Construction of the project would not exceed thresholds for PM_{10} or $PM_{2.5}$, would not contribute to exceedances of the NAAQS and CAAQS for particulate matter, and would not obstruct the SCAB from coming into attainment for these pollutants. The project would also not result in substantial diesel particulate matter emissions during construction. Additionally, the project would be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction. Due to the minimal contribution of particulate matter during construction, the project is not anticipated to result in health effects associated with PM_{10} or $PM_{2.5}$.

In summary, construction and operation of the project would not result in exceedances of the SCAQMD significance thresholds for criteria pollutants, and potential health effects associated with criteria air pollutants 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?

Less-than-Significant Impact. The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

Construction Odors

During project construction, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. However, such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Accordingly, impacts associated with odors during construction would be less than significant.

Operational Odors

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). Operation of the project would not entail any of these potentially odor-causing land uses. Rather, the project would include a CNG fueling station that would comply with SCAQMD Rule 431.1 limiting the sulfur content in gaseous fuels. Therefore, the project would not create any new sources of odor during operation, and project operations would result in an odor impact that is less than significant.

3.4 Biological Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV.	BIOLOGICAL RESOURCES - Would the project				
a)	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)	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)	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)	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)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			\boxtimes	
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				

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?

Less-than-Significant Impact with Mitigation Incorporated. The project's potential impacts to biological resources were evaluated in detail in a Biological Resources Assessment prepared by AECOM in November 2020 (Appendix B). The Biological Resources Assessment involved a survey of the project site plus a 500-foot buffer surrounding the project site, referred to as the biological survey area (BSA).

Special-Status Plant Species

The Biological Resources Assessment found that no previous special-status species have been previously recorded in the BSA. Due to the high levels of disturbance and lack of native habitat within the BSA, the BSA does not provide high-quality habitat for special-status plant or wildlife species. However, the BSA could provide marginal habitat for one special-status plant species, southern tarplant (*Centromadia perryi* ssp. *australis*), and eight special-status wildlife species: Crotch bumble bee (*Bombus crotchii*), Cooper's hawk (*Accipiter cooperii*), burrowing owl (*Athene cunicularia*), California horned lark (*Eremophila alpestris actia*), loggerhead shrike (*Lanius ludovicianus*), western red bat (*Lasiurus blossevillii*), cave myotis bat (*Myotis velifer*), and big free-tailed bat (*Nyctinomops macrotis*). Of the aforementioned species, all but southern tarplant and burrowing owl were determined to have a low potential to occur within the BSA; southern tarplant and burrowing owl were determined to have a moderate potential to occur within the BSA (Appendix B).

With regard to potential impacts to special-status plants, although it was not observed during the biological survey, the project could result in potential direct and indirect impacts to southern tarplant if it were to occur on the project site prior to construction (Appendix B). Permanent direct impacts to southern tarplant could occur if individuals were located within the footprint of the proposed new CNG compound laydown area or the footprint, these areas would be limited to less than 1 acre. Additionally, if disturbed during construction, southern tarplant could regrow under the aboveground pipeline rack. Temporary direct impacts could occur to southern tarplant in the existing construction laydown and fabrication yard, and the access routes between the laydown yards and the pipeline alignment. Absent mitigation, these potential impacts to southern tarplant may be significant.

As such, implementation of Mitigation Measure (MM-) BIO-1 (see below) would be required to reduce impacts to less than significant. MM-BIO-1 would require that a qualified biologist conduct pre-construction surveys within 30 days of the project start date to identify special-status species, including southern tar plant, within the project site. If a special-status species is detected during pre-construction surveys, avoidance buffers would be established, and biological monitoring would be conducted during construction activities to avoid impacts to these resources. If avoidance cannot be implemented (if, for example, southern tarplant were located within the footprint of the CNG compound laydown area or within the footprint of a pipe rack footing), impacts would be considered de minimis due to the nominal permanent area that would be disturbed by the project.

Indirect impacts to special-status plant species occurring outside of the project site could result from construction-related habitat loss and modification of sensitive natural communities related to dust, noise, and stormwater runoff, and through the potential spread of noxious and invasive plant species into these communities. Such impacts would be considered significant; however, suitable habitat for special-status plants is not present in the urbanized environment surrounding the project site, and by implementing standard construction practices related to fugitive dust and erosion control, the potential for indirect impacts to special-status plants are not anticipated.

Special-Status Wildlife Species

With regard to special-status wildlife species, the project could result in direct impacts to Crotch bumble bee, Cooper's hawk, western burrowing owl, loggerhead shrike, western red bat, cave mytosis bat, and big

free tailed bat. However, because no removal of potential roosts (trees or buildings) is required, the project is not likely to affect listed bat species.

Potential direct impacts to Crotch bumble bees could occur during ground-disturbing activities because Crotch bumble bees nest underground. Potential impacts could occur to western burrowing owls through the destruction of burrows or burrow entrances, harassment of occupied burrows, use of pesticides or rodenticides, and degradation of foraging habitat adjacent to burrows.

Direct impacts to ground-nesting special-status birds (i.e., California horned lark and loggerhead shrike) and nests of birds protected by the Migratory Bird Treaty Act (i.e., mourning dove) could be caused by pedestrian trampling of eggs or parental nest abandonment as a result of increased noise and vibration if active nests occur in the vicinity of construction. Direct impacts to Cooper's hawk nests or other tree-nesting birds protected by the Migratory Bird Treaty Act could occur as a result of nest abandonment.

Direct impacts to these special-status wildlife species are considered potentially significant absent mitigation. As such, implementation of MM-BIO-1 and MM-BIO-2 would be required to reduce impacts to a less-than-significant level. As discussed above, MM-BIO-1 would require that a qualified biologist conduct pre-construction surveys within 30 days of the project start date to identify special-status species within the project site, including Crotch bumble bee, Cooper's hawk, western burrowing owl, loggerhead shrike, western red bat, cave mytosis bat, and big free tailed bat. If a special-status species is detected during pre-construction surveys, avoidance buffers would be established, and biological monitoring would be conducted during construction activities to avoid impacts to these resources. MM-BIO-2 would require a pre-construction nesting bird survey to identify potential nests for special-status bird species and birds protected by the Migratory Bird Treaty Act. If special-status species or nesting birds protected by the Migratory Bird Treaty Act. If special-status species or nesting birds protected by the Migratory Bird Treaty Act. If special-status species or nesting birds protected by the Migratory Bird Treaty Act. If special-status species or nesting birds protected by the Migratory Bird Treaty Act. If special-status species or nesting birds protected by the Migratory Bird Treaty Act. If special-status species or nesting birds protected by the Migratory Bird Treaty Act. If special-status species or nesting birds protected by the Migratory Bird Treaty Act and California Fish and Game Code are detected during pre-construction surveys, avoidance buffers would be established, and biological monitoring would be conducted during construction activities to avoid impacts to these resources.

In summary, due to the highly disturbed nature of the project site, limited disturbance footprint, and with implementation of MM-BIO-1 and MM-BIO-2, impacts to special-status species would be less than significant.

- **MM-BIO-1** Prior to construction, a qualified biologist shall conduct a pre-construction survey within 30 days of the project start date to identify special-status species, including Crotch bumble bee, southern tarplant, burrowing owl, and roosting bats, within the Biological Study Area (BSA) of the immediate project site. The qualified biologist shall remain alert for the presence of any other special-status species. If a special-status species is detected during pre-construction surveys, avoidance buffers shall be established, and biological monitoring shall be conducted during construction activities to avoid impacts to these resources. Project construction may occur outside the avoidance buffer, and a biological monitor will not be required. If work is required within the buffer area, a qualified biologist will be present to facilitate resource avoidance. The biologist and any other site visitors must adhere to all site HSSE (Health, Safety, Security, Environmental) rules including COVID precaution measures.
- MM-BIO-2 If construction activities are scheduled to occur between February 15 and September 1 (i.e., nesting bird season), a nesting bird survey shall be conducted within 7 days prior to the start of construction to detect active nests for birds protected by the Migratory Bird Treaty Act and special-status avian species with potential to occur, including, but not limited to, Cooper's hawk, California

horned lark, and loggerhead shrike. If special-status species or nesting birds protected by the Migratory Bird Treaty Act and California Fish and Game Code are detected within the Biological Study Area (BSA) during pre-construction surveys, avoidance buffers shall be established. Project construction may occur outside the avoidance buffer without a biological monitor present. If construction activities within the avoidance buffer are required, then a biological monitor shall be required for the duration of those activities during construction activities to avoid impacts to these resources. The biologist and any other site visitors must adhere to all site HSSE (Health, Safety, Security, Environmental) rules including COVID precaution measures.

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?

Less-than-Significant Impact. Sensitive natural communities are those designated as rare in the region by the California Natural Diversity Database, support special-status plant or wildlife species, or receive regulatory protection (i.e., Section 404 of the Clean Water Act and/or Sections 1600 et seq. of the California Fish and Game Code). The Biological Resources Assessment states that there were no sensitive natural communities identified within the BSA (Appendix B). Therefore, impacts would be less than significant.

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?

Less-than-Significant Impact. Jurisdictional waters include waters of the United States and of the state that fall under the federal regulatory jurisdiction of the U.S. Army Corp of Engineers and/or under state jurisdiction of the California Department of Fish and Wildlife and Regional Water Quality Control Board (RWQCB). As concluded in the Biological Resources Assessment, no federal or state protected wetlands or jurisdictional waters are present within the BSA (Appendix B). Therefore, impacts would be less than significant.

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?

Less-than-Significant Impact. In an urban context, a wildlife corridor can be defined as a linear landscape feature of sufficient width and buffer to allow animal movement between two comparatively undisturbed habitat fragments, or between a habitat fragment and some vital resource that encourages population growth and diversity. Habitat fragments are isolated patches of habitat separated by otherwise foreign or inhospitable areas, such as urban tracts or highways.

The BSA is located in an industrialized and heavily urbanized area of the Los Angeles Basin. There is no recognized or established regional wildlife corridor within or near the BSA. Ornamental trees within and adjacent to the project site could provide opportunities for cover, forage, and nesting to localized bird populations, but they do not function as a wildlife corridor (Appendix B). Therefore, impacts would be less than significant.

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

Less-than-Significant Impact. The project would comply with all local policies and ordinances. The City of Carson Tree Preservation and Protection Ordinance dictates that parkway trees must be preserved and protected for aesthetic value for residences and visitors (Appendix B). During construction of the project, all protective measures for constructing near parkway trees (as outlined in Section 3928 of the City of Carson Tree Preservation and Protection Ordinance) would be followed. The project would not conflict with any local policies or ordinances protecting biological resources. Therefore, impacts would be less than significant.

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?

Less-than-Significant Impact. In Los Angeles County, a planning overlay called a Significant Ecological Area (SEA) was created and implemented by the County of Los Angeles's General Plan Conservation/Open Space Element. SEAs are ecologically important land and water systems that support valuable habitat for plants and animals, often integral to the preservation of rare, threatened, or endangered species, and the conservation of biological diversity in Los Angeles County. SEAs are not preserves, but they are areas where Los Angeles County deems it important to facilitate a balance between development and resource conservation (Appendix B).

The BSA does not coincide with a SEA. The nearest SEA is Harbor Lake Regional Park, which is approximately 4 miles southwest of the BSA (Appendix B). The project is not anticipated to affect resources within any SEA, and as a result, the SEA program would not be applicable to the project. Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state Habitat Conservation Plan, and impacts would be less than significant.

3.5 Cultural Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
۷.	CULTURAL RESOURCES – Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?			\boxtimes	
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		\boxtimes		
C)	Disturb any human remains, including those interred outside of dedicated cemeteries?		\boxtimes		

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to \$15064.5?

Less-than-Significant Impact. AECOM prepared a Cultural Resources Survey Memorandum in January 2021 (Appendix C), discussing potential cultural and historical impacts of the project. The project is subject to the requirements under CEQA, and historical and cultural resources are required to be considered as part of the CEQA process. A cultural resource is considered "historically significant" under CEQA if the resource meets the criteria for listing in the California Register of Historical Resources (CRHR) (PRC Section 5024.1, 14 CCR 4852).

To be eligible for listing in the CRHR, a property must be at least 45 years of age and possess significance at the local, state, or national level under one or more of the following four criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- Criterion 2: It is associated with the lives of persons important to local, California, or national history.
- Criterion 3: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values.
- Criterion 4: It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Historical resources eligible for listing in the CRHR may include buildings, sites, structures, objects, and historic districts. A resource younger than 45 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historic importance. Although the enabling legislation for the CRHR is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance (PRC Section 4852).

The CEQA Guidelines (Section 15064.5) contain the following additional guidelines for defining a historical resource:

- California properties formally determined eligible for, or listed in, the National Register of Historic Places (NRHP).
- Those resources included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code, or identified as significant in a historical resources survey meeting the requirements of Section 5024.1 (g) of the Public Resources Code.
- Those resources that a lead agency determines to be historically significant, provided the determination is based on substantial evidence.

On August 13, 2020, AECOM requested a records search at the South Central Coastal Information Center of the California Historical Resources Information System, housed at California State University, Fullerton (21614.7709). The records search request focused on the identification of previously completed studies and previously recorded cultural resources within a 0.25-mile radius of the project footprint, also referred to as the study area. There were six studies previously conducted within the project site and four studies previously conducted within the 0.25-mile radius around the project site. Of the 10 studies, only one was positive for cultural resources (Appendix C).

The one previously recorded cultural resource that was identified, P-19-188395, is the Shell Oil Company Dominguez Refinery. The Dominguez Refinery was recorded in 2007 as a historic-age building complex divided into six areas: Area I (Tank Farm), Area II (Refinery), Area III (Chemical Plant), Area IV (Ethanol Loading and Distribution Center), Area V (Agricultural Field), and the Office Complex Area. It was recommended as not eligible for the CRHR (Appendix C). In 2011, AECOM updated its evaluation and recommended that the site continued to not be eligible for listing in the CRHR. The historic refinery had largely been removed prior to 2011, and no extant buildings or structures associated with the historic refinery are on the project site. Although the Dominguez Refinery is associated with the oil boom in Los Angeles, it was determined to not be eligible for listing in the CRHR and was not considered a historical resource for the purposes of CEQA. There have been no changes to the integrity or significance of the buildings adjacent to the project site since 2011, and the overall determination of eligibility has not changed. These buildings remain insignificant examples of typical industrial building types and have not gained significance over the previous decade. Moreover, no buildings are on the project site, and the structures on the project site (e.g., pipe rack) are of recent construction (less than 45 years old) (Appendix C). Therefore, the project would not cause a substantial adverse impact to historical resources, and impacts 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?

Less-than-Significant Impact with Mitigation Incorporated. On November 3, 2020, AECOM archaeologist Frank Humphries conducted a reconnaissance archaeological survey of the proposed pipeline alignment within the project site. The entire project site has been previously mechanically graded and disturbed (Appendix C).

As discussed previously, AECOM completed an evaluation of site P-19-188395 in 2011 to determine eligibility for listing in the CRHR. Although the Dominguez Refinery is associated with the oil boom in Los Angeles, it was determined to not be eligible for listing in the CRHR and was not considered a historical resource for the purposes of CEQA. This site was revisited during the 2020 pedestrian survey, and new elements of the site were identified and briefly documented. The elements consisted of a series of five features consisting of eight foundations. The presence of these foundations does not change the 2011 evaluation or eligibility determination of the site. The buildings associated with these foundations have already been documented, and the refinery has been found ineligible under CRHR Criteria 1–4. The data contained in the foundations do not have the potential to yield information important in the history of the area, and do not change the prior determination under Criterion 4 (Appendix C). Therefore, impacts associated with these resources would be less than significant. The updated California Department of Parks and Recreation 523 series forms for P-19-188395 are included in Appendix C.

With regard to other potential archaeological resources unrelated to the Dominguez Refinery, the project site has been heavily disturbed, reducing the potential for encountering intact archaeological sites. However, soils on the project site consist of recent alluvium that may have buried archaeological resources that were formerly on the surface, and the vicinity of the project site was ecologically rich and attractive for settlement during the precontact period. The ethnographic village of Suangna is located approximately 2.5 miles south of the project site. Due to the sensitivity of the project site for precontact resources, and concerns that were identified by Native American representatives, the 2011 AECOM study recommended that ground-disturbing activities be monitored by a qualified archaeologist and Native American monitor (Appendix C).

Based on the amount of prior construction at the project site, it is anticipated that the upper 2 to 3 feet of the project site has been heavily disturbed. It is expected that the only proposed ground-disturbing work that has the potential to encounter intact, undisturbed soils are the few project elements that would require excavation that extends 3 feet or more below the current ground surface (e.g., precast trenches, canopy footings).

Although no archaeological resources (beyond the eight foundations) were identified during the archaeological investigation, there is a possibility of encountering previously undiscovered archaeological resources during excavation when activities extend 3 feet or move below the current ground surface (e.g., precast trenches, canopy footings). Implementation of MM-CUL-1, as well as MM-TCR-1 (see section 3.18, Tribal Cultural Resources), would ensure that potential impacts to archaeological resources during these activities are reduced to less than significant. Therefore, with the incorporation of mitigation, the project would not result in a substantial adverse change in the significance of an archaeological resource, and impacts would be less than significant.

MM-CUL-1 A qualified archaeological monitor shall be present for excavation activities that extend 3 feet or more below current ground surface (e.g., precast concrete trenches beneath the existing driveways and canopy footings). The archaeological monitor shall have the authority to stop ground-disturbing activities to assess any discoveries made in the field. As construction continues, the qualified monitor may recommend that monitoring be reduced if, at the maximum depth of ground disturbance, it is determined that the subsurface has previously been disturbed or otherwise shows no evidence of being sensitive for cultural resources. Monitors must adhere to all site HSSE (Health, Safety, Security, Environmental) rules. Monitors will need to be available with 3 business days' notice of when ground disturbance will occur.

In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist can evaluate the significance of the find and determine whether additional study is warranted. If the resources are determined to be Native American in origin, Native American tribes who consider the project area to be within their Tradition Use Area shall be consulted on the significance of the find and appropriate treatment. Depending on the significance of the find under the California Environmental Quality Act (CEQA) and the CEQA Guidelines (California Public Resources Code, Section 21082; 14 CCR 15064.5[f]), the qualified archaeologist may exhaust the data potential of the find through the process of field level recordation and then allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted.

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

Less-than-Significant Impact with Mitigation Incorporated. According to the Cultural Resources Survey Memorandum (Appendix C), a site with human remains is located approximately 2.5 miles south of the project site. However, given the distance from the project site and the fact that the site has been previously developed, ground-disturbing activities associated with construction of the project are unlikely to uncover previously unknown archaeological resources. In the unlikely event that human remains are discovered on site during construction ground-disturbing activities, implementation of MM-CUL-2, as well as MM-TCR-1

(see section 3.18, Tribal Cultural Resources), would set forth proper procedures to preserve the integrity of those resources. Therefore, with implementation of mitigation, impacts would be less than significant.

MM-CUL-2 If human remains are discovered during construction of the project, California Health and Safety Code Section 7050.5 states that further disturbances and activities shall stop in any area or nearby area suspected to overlie remains, and the County Coroner shall be contacted. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of discovery, the appropriate treatment and disposition of the human remains.

Pursuant to California Public Resources Code Section 5097.98, if the remains are thought to be Native American, the County Coroner shall notify the Native American Heritage Commission, which shall then notify the most likely descendent. At this time, the person who discovered the remains shall contact the City of Carson (City) so that the City may work with the most likely descendent on the respectful treatment and disposition of the remains. Additional provisions of the California Public Resources Code Section 5097.98 are to be followed as applicable.

3.6 Energy

VI.	Energy – Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			\boxtimes	

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?

Less-than-Significant Impact. The short-term construction and long-term operation of the project will require the consumption of energy resources in several forms at the project site and within the project area. Construction and operational energy consumption are evaluated in detail below.

Construction Energy Use

Electricity

Temporary electric power for as-necessary lighting and electronic equipment would be provided by Southern California Edison. The amount of electricity used during construction would be minimal because typical demand would stem from electrically powered hand tools. The electricity used for construction

activities would be temporary and minimal; therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of electricity. Impacts would be less than significant.

Natural Gas

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the subsection "Petroleum," below. Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect; therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of natural gas. Impacts would be less than significant.

Petroleum

Petroleum would be consumed throughout construction. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction. Transportation of construction materials and construction workers would also result in petroleum consumption. Heavy-duty construction equipment, delivery trucks, and haul trucks would use diesel fuel. Construction workers would likely travel to and from the project site in gasoline-powered vehicles. Construction is expected to take approximately 4 months, beginning in May 2021 and ending in August 2021. Once construction activities cease, petroleum use from off-road equipment and transportation vehicles would end. Because of the short-term nature of construction and relatively small scale of the project, impacts would be less than significant.

Operational Energy Use

As discussed in Section 1.1, Project Overview, the project would provide a CNG fueling station at the Shell Carson Distribution Terminal and would enable the conversion of up to seven diesel-powered trucks to use CNG fuel. Additionally, as discussed in Section 1.1, the project site is limited to an average of 195 trucks per day. Therefore, the addition of the CNG fueling station would not induce additional truck travel to and from the project site. The project would minimally increase the amount of CNG usage at the project site. However, the project would also reduce the amount of petroleum (diesel fuel) used on site. Given these considerations, petroleum and natural gas consumption associated with the project would not be considered inefficient or wasteful, and impacts would be less than significant.

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

Less-than-Significant Impact. As discussed in detail in Section 3.8, Greenhouse Gas Emissions, the project would be consistent with the City's Climate Action Plan, SCAG's RTP/SCS, and CARB's Scoping Plan, which all have renewable energy and/or energy efficiency components. The project would not conflict with a state or local plan for renewable energy or energy efficiency; therefore, impacts during construction and operation of the project would be less than significant.

3.7 Geology and Soils

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII.	GEOLOGY AND SOILS – Would the project:				
a)	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.				
	ii) Strong seismic ground shaking?			\square	
	iii) Seismic-related ground failure, including liquefaction?			\boxtimes	
	iv) Landslides?			\square	
b)	Result in substantial soil erosion or the loss of topsoil?			\boxtimes	
C)	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?				
d)	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?			\boxtimes	
e)	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?				
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				

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

Less-than-Significant Impact. The project site is located within the seismically active region of Southern California. The California Geologic Survey indicates that the City is not located in an Alquist-Priolo Earthquake Fault Zone (CGS 2021). The Avalon–Compton Fault Zone, which is part of the Newport–Inglewood Fault Zone, is the only active fault located within the City (City of Carson 2004c). The Avalon–Compton Fault Zone is located east of Avalon Boulevard and north of the Redondo Beach/Artesia Freeway. As a result, the City is located within a seismically active region, and earthquakes have the potential to cause ground shaking of significant magnitude.

However, the project would be constructed in accordance with the 2020 County of Los Angeles Building Code (Title 26), which has adopted and incorporated provisions of the 2019 California Building Code. In addition, the project would not exacerbate the potential for seismic shaking to occur, and therefore would not directly or indirectly cause substantial adverse effects due to strong seismic ground shaking. As a result, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less-than-Significant Impact. The project site is located in a seismically active area of Southern California. The project would be constructed in accordance with the 2020 County of Los Angeles Building Code (Title 26), which has adopted and incorporated provisions of the 2019 California Building Code. In addition, the project would not exacerbate the potential for seismic shaking to occur, and therefore would not directly or indirectly cause substantial adverse effects due to strong seismic ground shaking. As a result, impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less-than-Significant Impact. Liquefaction typically occurs when a site is subjected to strong seismic shaking, on-site soils are cohesionless, and groundwater is encountered near the surface. The factors known to influence liquefaction potential include soil type and grain size, relative density, groundwater level, confining pressures, and intensity and duration of ground shaking. In general, materials that are susceptible to liquefaction are loose, saturated granular soils that have low fines content under low confining pressures. Exhibit SAF-4 in the Safety Element of the General Plan indicates that the project site is not within a liquefaction hazard area (City of Carson 2004c).

The project would be held to performance standards within the applicable ordinances (including site clearing and preparation, fills, and excavation regulations) of the City of Carson and Los Angeles County, as well as the standards provided in the most recent California Building Code. With compliance with the performance standards within all applicable ordinances, the risk of loss, injury, or death involving liquefaction would be less than significant.

iv) Landslides?

Less-than-Significant Impact. The project site is generally flat with no steep slopes and does not contain soils subject to potential landslides. The City of Carson General Plan – Safety Element indicated that slope instability is limited to slopes adjacent to flood control channels, which the project site is not adjacent to (City of Carson 2004c). Therefore, the potential for landslides is considered negligible, and impacts would be less than significant.

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

Less-than-Significant Impact. The project site is partially developed with paved surfaces and an pipe rack and also contains large expanses of previously graded, exposed soil. Project construction would involve site preparation, some additional grading, and trenching, which may temporarily expose soils to increased erosion potential. The project would be required to comply with the applicable provisions of Chapter 8, Stormwater and Urban Runoff Pollution Control, of the City's Municipal Code. The provisions of Chapter 8 require the deployment of various best management practices (BMPs) intended to minimize soil erosion during construction.

Upon completion of construction, the surface of the project site would either be developed with impervious improvements (as in the case of the CNG laydown area and the pipe rack footings) that would help to stabilize on-site soils, or would be returned to pre-construction conditions. As a result, the project would not result in new or more severe conditions that would allow for soil erosion to occur. Therefore, impacts 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?

Less-than-Significant Impact. The Dominguez oil field is located within the project site. As noted in the City of Carson's General Plan Safety Element, there has been no ground subsidence associated with the Dominguez oil field (City of Carson 2004c). Historic withdrawal of oil has been known to cause subsidence in portions of the Wilmington oil field, but by the early 1980s, subsidence at the oil fields have been mitigated and are no longer occurring. Therefore, impacts 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?

Less-than-Significant Impact. 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. According to a report prepared for the Shell Carson Distribution Complex as part of unrelated investigations occurring throughout the site, on-site soils typically consist of interbedded silts, sandy silts, and silty clays, which do not have a high expansion rate (AECOM 2020). Therefore, soil-expansion-related impacts 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?

No Impact. The project does not propose the use of septic tanks; therefore, no impact would occur.

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

Less-than-Significant Impact. According to the September 2012 Draft Environmental Impact Report for the Shell Carson Facility Ethanol (E10) Project (which covered the project site), no paleontological resources are known to exist within the Shell facility, although their presence cannot be completely discounted (SCAQMD 2012). Although the project site has been subject to intense ground disturbance over the development of the Dominguez Refinery, if present, project construction could potentially result in the loss of paleontological resources. Therefore, MM-GEO-1 is provided and would be implemented to ensure that potential impacts during construction activities to paleontological resources or unique geologic features are reduced to a less-than-significant level.

MM-GEO-1 In the event that paleontological resources (fossil remains) are exposed during construction activities for the project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology's 2010 guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the resource. All recommendations shall be made in accordance with the Society of Vertebrate Paleontology's 2010 guidelines and shall be subject to review and approval by the City of Carson. Work in the area of the find may only resume upon approval of a qualified paleontologist.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS - Would t	he project:			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			\boxtimes	
 b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? 				

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

Less-than-Significant Impact. Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates

a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g), for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃) (see also 14 CCR 15364.5). The three GHGs evaluated herein are CO₂, CH₄, and N₂O. Emissions of HFCs, PFCs, SF₆, and NF₃ are generally associated with industrial activities, including the manufacturing of electrical components, heavy-duty air conditioning units, and insulation of electrical transmission equipment (substations, power lines, and switchgears). Therefore, emissions of these GHGs were not evaluated or estimated in this analysis because the project would not include these activities or components and would not generate HFCs, PFCs, SF₆, or NF₃ in measurable quantities.

Gases in the atmosphere can contribute to climate change both directly and indirectly.⁶ The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO₂; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO₂ equivalent (CO₂e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH₄ is 25 MT CO₂e (emissions of 1 MT of CH₄ are equivalent to emissions of 25 MT of CO₂), and the GWP for N₂O is 298 MT CO₂e, based on the Intergovernmental Panel on Climate Change Fourth Assessment Report (IPCC 2007).

As discussed in Section 3.3, Air Quality, of this IS/MND, the project site is located within the jurisdictional boundaries of the SCAQMD. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the SCAQMD Governing Board. However, in December 2008, SCAQMD adopted an interim 10,000 MT CO₂e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development

⁶ Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2017).

projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- **Tier 1** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- **Tier 2** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- **Tier 3** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO₂e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO₂e per year), commercial projects (1,400 MT CO₂e per year), and mixed-use projects (3,000 MT CO₂e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO₂e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4 Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of Assembly Bill (AB) 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO₂e per-service population for project-level analyses and 6.6 MT CO₂e per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- **Tier 5** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Section 15064.7(c) of the CEQA Guidelines specifies that "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

To determine the project's potential to generate GHG emissions that would have a significant impact on the environment, the project's GHG emissions were compared to the industrial land project quantitative threshold of 10,000 MT CO₂e per year. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project, which is assumed to be 30 years (SCAQMD 2008). Thus, this impact analysis compares estimated operational emissions plus amortized construction emissions to the proposed SCAQMD threshold of 10,000 MT CO₂e per year.

Construction Emissions

Construction of the project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road trucks, and worker vehicles. A depiction of expected construction schedules (including information regarding phasing, equipment used during each phase, truck trips, and worker vehicle trips) assumed for the purposes of emissions estimation is provided in Table 1, Construction Scenario Assumptions (see Section 3.3, Air Quality), and in Appendix A. On-site sources of GHG emissions include off-road equipment; off-site sources include trucks and worker vehicles. Table 5 presents construction GHG emissions for the project from on-site and off-site emissions sources.

Table 5. Estimated Annual Construction Greenhouse Gas Emissions

	CO2	CH4	N2O	CO ₂ e	
Year	Metric Tons per Year				
2021	219.42	0.04	0.00	220.41	
		ruction Emissions	7.34		

Source: See Appendix A for complete results.

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 5, amortized over 30 years, total construction GHG emissions would be approximately 220 MT CO₂e per year. Amortized over 30 years, construction GHG emissions would be approximately 7 MT CO₂e per year. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

Operational Emissions

CalEEMod Version 2016.3.2 was used to estimate potential project-generated operational GHG emissions from area sources (landscape maintenance) and stationary sources (CNG compressors). Because the project would be located at an existing fueling site, no ancillary building structures that would require energy are associated with the project. For additional details, see Section 3.3 for a discussion of operational emission calculation methodology and assumptions. Year 2022 was assumed as the first full year of operations after project construction. Table 6 presents the annual GHG emissions associated with operation of the project. Additional details are included in Appendix A.

Table 6. Estimated Annual Operational Greenhouse Gas Emissions

	CO2	CH₄	N ₂ O	CO ₂ e		
Emission Source	Metric Tons per Year					
Area	< 0.01	0	0	<0.01		
Energy	0	0	0	0		
Mobile	0.00	0	0	0.00		
Stationary Sources	389.26	0.02	0	398.68		
Total	389.26	0.02	0	398.68		
	7.34					
	406.03					

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent See Appendix A for detailed results.

Values of "<0.01" indicate that the estimated emissions are less than two decimals. Totals may not sum due to rounding.

As shown in Table 6, the estimated annual project-generated GHG emissions would be approximately 399 MT CO₂e per year as a result of project operation. When summed with the amortized project construction emissions, the total annual GHGs would be approximately 406 MT CO₂e per year. Annual operational GHG emissions with amortized construction emissions would not exceed the SCAQMD threshold of 10,000 MT CO₂e per year. Therefore, the project's GHG contribution would not be cumulatively considerable and impacts would be less than significant.

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

Less-than-Significant Impact. The City is one of 14 cities that are part of the South Bay Cities Council of Governments (SBCCG) Climate Action Plan (CAP) (SBCCG 2017). SBCCG's subregional emissions reduction targets are 15% below 2005 levels by 2020 and 49% below 2005 levels by 2035. The CAP focuses on feasible actions South Bay city communities can and should take, and innovative approaches that will be needed to achieve the 2035 target. The CAP identified objectives and actions in six categories to meet the 2020 GHG emissions target: land use and transportation, energy efficiency, solid waste, water, urban greening, and energy generation and storage.

The project would result in densification of an existing land use within the City, which is consistent with the land use reduction strategies identified in the CAP. The project also proposes to enable the use of CNG-fueled heavy-duty trucks in place of diesel trucks, which is consistent with the CAP's transportation strategies. The project does not conflict with or preclude the City from implementation of any other policies identified in the CAP. As such, the project is consistent with the City's goal of environmental sustainability. The project would not conflict with the City's General Plan or with implementation of SBCCG's CAP.

The CARB Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.⁷ Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

SCAG's 2016 RTP/SCS is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in Southern California. The 2016 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. As discussed in Section 3.14, Population and Housing, the project would not exceed SCAG's population growth projections for the City used in the 2016 RTP/SCS (SCAG 2016). Additionally, the project would support the goals of the RTP/SCS by allowing for the expanded use of CNG fuel in heavy-duty trucks. Redevelopment of the project

⁷ The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

site would not conflict with implementation of the strategies identified in the 2016 RTP/SCS that would reduce GHG emissions.

The project would not impede the attainment of the GHG reduction goals for 2030 or 2050 identified in Executive Order S-3-05 and Senate Bill (SB) 32. Executive Order S-3-05 establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050. SB 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, will ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030. Although there are no established protocols or thresholds of significance for that future-year analysis, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014).

CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states that the level of reduction is achievable in California (CARB 2014). CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in Assembly Bill (AB) 32, SB 32, and Executive Order S-3-05. This is confirmed in the Second Update, which states the following (CARB 2017):

The Proposed Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while also identifying new, technologically feasibility and costeffective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Proposed Plan is developed to be consistent with requirements set forth in AB 32, SB 32, and AB 197.

The project would not interfere with implementation of any of the above-described GHG reduction goals for 2030 or 2050 because the project would not exceed SCAQMD's recommended threshold of 10,000 MT CO₂e per year (SCAQMD 2008). Additionally, the project would further reduce GHGs by allowing for greater use of CNG trucks in place of diesel trucks. Therefore, because the project would not exceed the threshold, this analysis provides support for the conclusion that the project would not impede the state's trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050.

In addition, because the specific path to compliance for the state for the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the project would be speculative and cannot be identified at this time. The project's consistency would assist in meeting the City's contribution to GHG emissions reduction targets in California. With respect to future GHG targets under SB 32 and Executive Order S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet the SB 32 40% reduction target by 2030 and the Executive Order S-3-05 80% reduction target by 2050. This legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the trajectory toward meeting these future GHG targets.

Based on the above considerations, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs. This impact would be less than significant.

3.9 Hazards and Hazardous Materials

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX.	HAZARDS AND HAZARDOUS MATERIALS - Wo	ould the project:			
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b)	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?				
C)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d)	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?				
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?				
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				

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

Less-than-Significant Impact with Mitigation Incorporated. The potential impacts associated with the routine transport, use, or disposal of hazardous materials resulting from the project are described below.

Short-Term Construction Impacts

Use of Hazardous Materials

A variety of hazardous materials, including fuels for equipment and vehicles, new and used motor oils, cleaning solvents, and paints, would be transported to and stored, used, and generated on the project site during construction activities for the project. Improper handling and/or use of these materials during construction would represent a potential risk to the public and the environment. Construction contractors are responsible for accident prevention and containment, and construction specifications typically include provisions to properly manage hazardous substances and wastes. All contractors are required to comply with applicable regulations and California Occupational Safety and Health Administration guidelines regarding the transport, use, and disposal of hazardous materials and hazardous waste. Examples of hazardous materials management include providing completely enclosed containment for all refuse generated in the project area. In addition, all construction waste, including trash, litter, garbage, solid waste, petroleum products, and any other potentially hazardous materials, would be removed and transported to a permitted waste facility for treatment, storage, and/or disposal. Compliance with applicable regulations and California Occupational Safety and Health Administration guidelines would ensure that proper use and disposal of these materials would not pose a significant risk to the public and the environment. Impacts would be less than significant.

Subsurface Impacts

The following background information is based in part on the "Shell – Carson Terminal" case summary, obtained from the State Water Resources Control Board's GeoTracker database (SWRCB 2020).

Historically, the Shell Carson Distribution Complex supported refinery and chemical manufacturing operations from 1928 to 1991, at which time it was converted into a distribution terminal operation, with storage of refined petroleum products and ethanol.

Investigation of environmental conditions at the Shell Carson Distribution Complex has been ongoing since the mid-1970s. Since 1985, investigations have been conducted in accordance with a series of Cleanup and Abatement Orders issued by the Los Angeles RWQCB. Investigations have focused on soil, soil gas, and groundwater assessment, both on site and off site. Contaminants of concern most frequently detected throughout the Shell Carson Distribution Complex are benzene, DIPE, TBA, TPHg, and naphthalene. Arsenic, chromium, antimony, and lead are locally present in shallow soils at concentrations exceeding their background values. Groundwater contamination occurrences are well-defined in areas throughout the Shell Carson Distribution Complex, including in the area where the project would be constructed. The project applicant, which operates the Shell Carson Distribution Complex, is currently involved in numerous remediation activities throughout the Shell Carson Distribution Complex and the Shell Carson Distribution Complex and Distribution Complex and the Shell Carson Distribution RWQCB. Given these existing environmental conditions, project construction could potentially expose construction workers to contaminants of concern as on-site soils are handled. As such, MM-HAZ-1 would be required. MM-HAZ-1 would require that a work plan be prepared that addresses the identification, sampling, characterization, handling, segregation, storage, and disposal of contaminated soils consistent with regulatory requirements. The work plan would contain a pre-excavation sampling plan. A communication and notification process would be included in the work plan to ensure that the appropriate agency or agencies are notified in accordance with local, state, and federal requirements.

There are numerous local, state (CCR Title 22), and federal rules that regulate the characterization, handling, transportation, and ultimate disposition of contaminated soils. CCR Title 22 establishes many requirements for hazardous waste characterization, handling, transport, and disposal, including the requirements in Section 66261.20 and Sections 66265.250 through 66265.260 pertaining to characterization of hazardous wastes; storage of hazardous wastes in piles and requirements to use approved disposal/treatment facilities; use of certified hazardous waste transporters; and use of manifests to track hazardous materials, among many other requirements. Soil sampling and analysis would be conducted in the excavation areas pursuant to the requirements for hazardous waste characterization in Section 66261.20, and the project applicant will comply with all applicable rules and regulations.

Preparation and implementation of a work plan that addresses the identification, sampling, characterization, handling, segregation, storage, and disposal of contaminated soils consistent with regulatory requirements would reduce impacts associated with excavation and disposal of potentially contaminated soils to less than significant.

MM-HAZ-1 Prior to the start of grading or soil excavation, a Construction Contaminated Soils Management Plan (SMP) that addresses the identification, sampling, characterization, handling, segregation, storage, and disposal of contaminated soils in compliance with local, state, and federal regulations shall be prepared and implemented. The SMP shall contain a pre-excavation sampling plan and state the mechanism(s) used to identify impacted soils during the actual excavations. A communication and notification process shall be included in the SMP to ensure the appropriate agency or agencies are notified in accordance with local, state, and federal requirements.

Long-Term Operational Impacts

Operation of the project would involve routine transport, storage, and dispensing of CNG fuels. The project would follow the rules and regulations of applicable local, state, and federal requirements regarding CNG stations. Additionally, staff would perform routine daily maintenance in the form of visual inspections, as well as maintenance at 400-, 2,000-, and 4,000-hour intervals to ensure that the equipment functions properly and efficiently. If any issues arise, a technician would be dialed in or dispatched to the proposed CNG fueling station. Further, the compressors would include temperature sensors to trigger a shutdown in the event that measurements are out of range. Given the strict regulatory environment with which the project would be required to comply, and given the level of maintenance and inspection that would routinely occur, operational impacts related to the routine transport, use, or disposal of hazardous materials 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?

Less-than-Significant Impact with Mitigation Incorporated. Construction activities associated with the project would involve the use and storage of a variety of hazardous materials, including fuels for equipment and vehicles, new and used motor oils, cleaning solvents, and paints. However, compliance with applicable regulations and California Occupational Safety and Health Administration guidelines would ensure that proper use and disposal of these materials would not pose a significant risk to the public or the environment. Additionally, potentially significant impacts could occur during soil handling activities; however, implementation of MM-HAZ-1 would reduce these impacts to less than significant.

With regard to project operation, the project would involve the transport, storage, and dispensing of CNG fuels. However, the project would be required to comply with all rules and regulations of applicable local, state, and federal requirements regarding CNG dispensing stations. Additionally, routine maintenance and inspections would ensure that the equipment functions properly and efficiently. Therefore, operational impacts related to reasonably foreseeable upset and accident condition 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?

No Impact. No schools are located within 0.25 miles of the project site. The nearest school, Del Amo Elementary School, is located approximately 0.50 miles from the project site. No impact would occur.

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?

Less-than-Significant Impact with Mitigation Incorporated. The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the state and local agencies and developers to comply with the CEQA requirements in providing information about the locations of hazardous materials release sites. California Government Code Section 65962.5 requires the California Environmental Protection Agency to develop, at least annually, an updated Cortese List. The Department of Toxic Substances Control is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous materials release information for the Cortese List.

As discussed in Section 3.9(a), the project site is located within the Shell Carson Distribution Complex, which has been subject to remediation activities under the oversight of the Los Angeles RWQCB. As such, the project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, with implementation of MM-HAZ-1, the project would not result in a significant hazard to the public or the environment. Additionally, the project applicant has submitted a signed Hazardous Waste and Substances Statement to the lead agency required under Section 65962.5(f). Therefore, with implementation of MM-HAZ-1, impacts 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?

No Impact. The project is not located within 2 miles of a public airport, nor is it located within an airport land use plan. The nearest private airstrip to the project site is the Goodyear Blimp Airship Base, located approximately 1.9 miles northwest of the project site. However, the project would be located within the Shell Carson Distribution Complex and would not involve the development of tall structures that could potentially result in a flight hazard to operation of the Blimp Airship. Given the considerable distance between the project site and the Goodyear Blimp Airship Base and the low height of the project, no impacts would occur.

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

Less-than-Significant Impact. The City's Multi-Hazard Functional Plan identifies emergency routes. Major freeways (e.g., I-405, SR-91, I-110, and I-710) could be used as emergency routes. East/west arterial streets that would be used as evacuation routes include Lomita Boulevard, Sepulveda Boulevard, 223rd Street, Carson Street, Del Amo Boulevard, Victoria Street, Artesia Boulevard, and Alondra Boulevard. North/south arterial streets include Santa Fe Avenue, Alameda Street, Wilmington Avenue, Avalon Boulevard, Main Street, Figueroa Street and Broadway (City of Carson 2004c).

Access to these evacuation routes and all local roads would be maintained during construction and operation of the project. Emergency procedures or design features required by federal, state, or City regulations would be implemented as appropriate during construction and operation. Maintaining access along all local roads during construction would minimize the potential for traffic conflicts with designated evacuation routes, and implementation of emergency procedures would minimize the potential for interference with an adopted emergency response plan.

Designated delivery and haul routes for the project would be consistent with those currently used for fueling and other activities. Trucks and equipment would use Wilmington Avenue and either I-405 or SR-91 for these trips. There would be approximately 10 pick-up trucks traveling to and from the project site each day during construction, which would not significantly alter access or traffic on the identified emergency routes. The project would not impede access to local roadways or evacuation routes. Operation of the project would not induce a substantial increase in traffic. Therefore, impacts resulting from the project 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?

No Impact. The project site is surrounded by existing development, is within an urbanized area, and is not within a High Fire Severity Zone (HFSZ) as mapped by the California Department of Forestry and Fire Protection (CAL FIRE) (CAL FIRE 2021). The project would not create new structures that would significantly increase the number of people traveling to and from the site compared to the existing condition of the project site. Therefore, the project would not increase the exposure of people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. The project would result in no impact from increasing the risk of exposure to wildfire.

3.10 Hydrology and Water Quality

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Χ.	HYDROLOGY AND WATER QUALITY - Would the	ne project:			
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
C)	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;			\boxtimes	
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;			\boxtimes	
	 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; or 				
	iv) impede or redirect flood flows?			\square	
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				

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

Less-than-Significant Impact. The project site is undeveloped and has been previously graded. Project construction would involve site preparation, some additional grading, and trenching, which may temporarily expose soils to increased erosion potential and result in downstream water quality issue. The project would

be required to comply with the applicable provisions of Chapter 8, Stormwater and Urban Runoff Pollution Control, of the City's Municipal Code. The provisions of Chapter 8 require the deployment of various best management practices (BMPs) intended to minimize soil erosion during construction.

Upon completion of construction, the surface of the project site would either be developed with impervious surfaces (as in the case of the CNG laydown area and the pipe rack footings) that would help to stabilize on-site soils, or would be returned to pre-construction conditions. As a result, the project would not result in new or more severe conditions that would allow for soil erosion and any adverse downstream water quality effects to occur. Therefore, impacts 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?

Less-than-Significant Impact. The project would not require groundwater during construction or operation. Additionally, the project would have a maximum excavation for construction of approximately 6 to 8 feet for canopy footings, and groundwater within the City occurs at a depth of approximately 30 feet below ground (City of Carson 2002); as such, groundwater would not be encountered during construction. Lastly, given its current use, the project site does not serve as a groundwater recharge area. As such, impacts to groundwater supplies and 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?

Less-than-Significant Impact. The majority of the existing site is a developed urban area with little to no vegetative cover. The project would involve construction of a new natural gas pipeline and facilities to dispense CNG at the Shell Carson Distribution Terminal. However, the project would comply with all permitting requirements to treat runoff. As such, the project would not substantially alter the existing drainage pattern such that substantial erosion would occur on or off site. Therefore, impacts 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 off site?

Less-than-Significant Impact. The Shell Carson Distribution Complex has an existing stormwater management program (SCAQMD 2012). The ethanol loading rack and its surrounding area are currently connected to the existing stormwater management system and will continue to be connected to the existing system after construction is completed. Although the project would result in some change to the existing drainage pattern of the site, the new proposed surfaces (i.e., CNG compound laydown and concrete pipe rack footings) would be minor and are of such a small size (i.e., less than 1 acre) that they would not substantially change or increase the rate or amount of surface runoff during storm events. As such, the project would not substantially alter the existing drainage patterns such that it would increase flooding on or off site. Impacts 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?

Less-than-Significant Impact. Refer to responses in Sections 3.10(c)(ii) and 3.10(c)(iii). With implementation of the project, the flow patterns of the site will largely remain the same. As such, impacts would be less than significant.

iv) impede or redirect flood flows?

Less-than-Significant Impact. According to Flood Insurance Rate Map Panel 06037C1955F as produced by the Federal Emergency Management Agency (FEMA), the project site is located within FEMA-designated Flood Hazard Zone X, which is not within either the 100- or 500-year flood hazard area. Impacts would be less than significant.

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

No Impact. As discussed in Section 3.10(c)(iv), the project site is located within FEMA-designated Flood Hazard Zone X, which is not within either the 100- or 500-year flood hazard area. In addition, due to the project site's inland location (approximately 6 miles from the Pacific Ocean) and lack of adjacent waterbodies such as lakes or reservoirs, the project site would not be subject to tsunami or seiche. No impact would occur.

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

Less-than-Significant Impact. The project would be required to comply with all applicate plans, including policies and programs referred to in the City's General Plan Safety Element (City of Carson 2004c). The project would not conflict with or obstruct applicable water quality plans. Additionally, as described in Section 3.10(b), the project would not use or interfere with groundwater recharge or use. Therefore, impacts would be less than significant.

3.11 Land Use and Planning

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	LAND USE AND PLANNING – Would the project	ct:			-
a)	Physically divide an established community?				\boxtimes
b)	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?				

a) Would the project physically divide an established community?

No Impact. The project would be located entirely within the confines of the existing Shell Carson Distribution Complex, which is not open to the public. No project components would potentially block or impede movements between surrounding established communities. No impact would occur.

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?

Less-than-Significant Impact. The project site and Shell Carson Distribution Complex are currently zoned as Heavy Industrial. The City's General Plan Land Use Element identifies the Heavy Industrial designation as a land use designation inclusive of extractive, primary processing, construction yards, rail operation, truck yards and terminals, and food processing industries (City of Carson 2004a). Operation of the project would align with the Heavy Industrial zoning designation and is a conditionally permitted.

A conditional use permit for the project is being sought by the project applicant, and if approved by the Planning Commission, the project would be consistent with the City's Municipal Code and General Plan. The project would involve development of a CNG dispensing station within an existing ethanol distribution facility in order to convert existing diesel-fueled trucks to CNG. This proposed use would be complementary to the existing use and would reduce the amount of petroleum (diesel fuel) used on site. As such, because the project is consistent with the underlying land use plan and would be complementary to the existing use, it would not result in a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environmental effect. Impacts would be less than significant.

3.12 Mineral Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII.	MINERAL RESOURCES – Would the project:				
a)	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)	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?				

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?

No Impact. The State Mining and Reclamation Act of 1975 (PRC Section 2710 et seq.) requires that the California State Geologist implement a mineral land classification system to identify and protect mineral resources of regional or statewide significance. According to maps obtained through the California

Department of Conservation and California Geological Survey, the project site is within a Mineral Resource Zone 1 (MRZ-1), which is defined as an area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence (DOC 1982).

The project site has been historically been used for oil extraction; however, these activities ceased in the 1992 and the site is now used for storage and distribution of petroleum products. Implementation of the project would assist in these operations and would not affect the availability of a known mineral resource. Therefore, no impacts associated with mineral resources would occur.

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?

No Impact. According to the City's General Plan EIR, no known significant mineral resources are located within the City (City of Carson 2002). Implementation of the project would not result in the loss of any known mineral resources. Therefore, no impacts associated with mineral resource recovery sites would occur.

3.13 Noise

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII	. NOISE – Would the project result in:				
a)	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?				
b)	Generation of excessive groundborne vibration or groundborne noise levels?			\boxtimes	
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?				

Noise Fundamentals

Generally, federal and state agencies regulate mobile noise sources by establishing and enforcing noise standards on vehicle manufacturers. Local agencies generally regulate stationary noise sources and construction activities to protect neighboring land uses and the public's health and welfare. Noise-sensitive land uses include residences, hotels and motels, schools and universities, hospitals, and churches. The nearest

noise-sensitive land uses to the project site are single-family residences located approximately 540 feet southeast of the project site, and a park (Dolphin Park) located approximately 1,100 feet to the southeast.

A brief background on the fundamentals of environmental acoustics is helpful in understanding how humans perceive various sound levels. Although extremely loud noises can cause temporary or permanent damage, the primary environmental impact of noise is annoyance. The objectionable characteristic of noise often refers to its loudness. Loudness represents the intensity of the sound wave, or the amplitude of the sound wave height measured in decibels (dB). Decibels are calculated on a logarithmic scale; thus, a 10 dB increase represents a 10-fold increase in acoustic energy or intensity, and a 20 dB increase represents a 100-fold increase in acoustic energy or intensity, and a 20 dB increase represents a 100-fold increase in acoustic energy or intensity of environmental sound because of the direct relationship between a sound's intensity and the subjective "noisiness" of it. The A-weighted decibel (dBA) system is a convenient sound measurement technique that weighs selected frequencies based on how well humans can perceive them.

The range of human hearing spans from the threshold of hearing (approximately 0 dBA) to that level of noise that is beyond the threshold of pain (approximately 120 dBA). In general, human sound perception is such that a change in sound level of 3 dB in a normal setting (i.e., outdoors or in a structure, but not in an acoustics laboratory without background noise levels) is just noticeable, and a change of 5 dB is clearly noticeable. A change of 10 dB is perceived as a doubling (or halving) of sound level. Noise levels are generally considered low when they are below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss if exposure is sustained.

Ambient environmental noise levels can be characterized by several different descriptors. Energy equivalent or energy average level (L_{eq}) describes the average or mean noise level over a specified period of time. L_{eq} provides a useful measure of the impact of fluctuating noise levels on sensitive receptors over a period of time. Other descriptors of noise incorporate a weighting system that accounts for a person's susceptibility to noise irritations at night. Community Noise Equivalent Level (CNEL) is a measure of cumulative noise exposure over a 24-hour period, with a 5 dBA penalty added to evening hours (7:00 p.m. to 10:00 p.m.) and a 10 dBA penalty added to night hours (10:00 p.m. to 7:00 a.m.). Since CNEL is a 24-hour average noise level, an area could have sporadic loud noise levels above 65 dBA but that average lower over the 24-hour period.

Existing Noise Conditions

Currently, the project site generates noise associated with the existing and ongoing fuel distribution facility. Additionally, the project site and surrounding area is subject to traffic noise associated with nearby roadways, including 213th Street, Wilmington Avenue, Del Amo Boulevard, Carson Street, and I-405, as well as noise from adjacent industrial/commercial uses.

Noise measurements were conducted near the project site in December 2020 to characterize the existing noise environment. The daytime, short-term (1 hour or less) staff-attended sound-level measurements were taken with a Soft-DB Piccolo sound level meter equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The sound level meter meets the current American National Standards Institute standard for a Type 2 (General Purpose) sound level meter. The accuracy of the sound level meter was verified using a field calibrator before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Four noise measurement locations (ST1–ST4) that represent key potential sensitive receptors or sensitive land uses were selected near the project site. The measurement locations are shown in Figure 4, Noise Measurement Locations, and the measured average noise levels and measurement locations are provided in Table 7. Noise measurement data is also included in Appendix D, Noise. The primary noise sources at the measurement locations consisted of distant traffic. Secondary noise sources included distant aircraft, distant industrial and landscaping activities, distant conversations, and birdsong. As shown in Table 7, the existing daytime ambient noise levels ranged from approximately 55 dBA Leq at ST3 to 68 dBA Leq at ST4.

Table 7. Measured Noise Levels

Receptors	Location/Address	Date	Time	L _{eq} (dBA)	L _{max} (dBA)
ST1	21002 Martin Street (Residential)	12/15/2020	9:12 a.m. – 9:27 a.m.	63.8	73.2
ST2	21003 Pontine Avenue (Residential)	12/15/2020	9:37 a.m 9:52 a.m.	54.5	70.1
ST3	Northwest end of Dolphin Park (Recreational)	12/15/2020	10:02 a.m. – 10:17 a.m.	55.3	69.9
ST4	21303 Lostine Avenue (Residential)	12/15/2020	10:29 a.m. – 10:44 a.m.	67.8	83

Source: Appendix D.

Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibel; L_{max} = maximum sound level during the measurement interval.

Thresholds of Significance

City of Carson General Plan

Applicable policies and standards governing environmental noise in the City are contained in the City of Carson General Plan Noise Element (City of Carson 2004f). The Noise Element specifies exterior noise levels up to 60 dBA CNEL as normally acceptable, and up to 65 dBA CNEL as conditionally acceptable. Noise levels exceeding 65 dBA CNEL are generally unacceptable for multiple family residential uses. Table 8 indicates standards regarding acceptable noise level limits for various land uses in the City.

Table 8. Noise Element Land Use Compatibility Matrix

	Community Noise Exposure (dBA CNEL)					
Land Use Category	Normally Acceptable ¹	Conditionally Acceptable ²	Normally Unacceptable ³	Clearly Unacceptable ⁴		
Residential-Low Density	50-60	60-65	65-75	75-85		
Residential-Multiple Family	50-60	60-65	65-75	75-85		
Transient Lodging-Motel, Hotels	50-65	65-70	70-80	80-85		
Schools, Libraries, Churches, Hospitals, Nursing Homes	50-60	60-65	65-80	80-85		
Amphitheater, Concert Hall, Auditorium, Meeting Hall	N/A	50-65	N/A	65-85		
Sports Arenas, Outdoor Spectator Sports	N/A	50-70	NA	70-85		
Playgrounds, Neighborhood Parks	50-70	N/A	70-75	75-85		
Gold Courses, Riding Stables, Water Recreation, Cemeteries	50-70	N/A	70-80	80-85		
Office Buildings, Business Commercial and Professional	50-67.5	67.5-75	75-85	N/A		

	Community Noise Exposure (dBA CNEL)				
Land Use Category	Normally Acceptable ¹	Conditionally Acceptable ²	Normally Unacceptable ³	Clearly Unacceptable ⁴	
Industrial, Manufacturing, Utilities, Agriculture	50-70	70-75	75-85	N/A	

Table 8. Noise Element Land Use Compatibility Matrix

Source: City of Carson 2004f.

Notes: CNEL = Community Noise Equivalent Level; N/A = not applicable.

¹ Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

² Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

³ Normally Unacceptable: New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

⁴ Clearly Unacceptable: New construction or development should generally not be undertaken.

Section 3.4 of the City's Noise Element identifies residences, public and private school/preschool classrooms, churches, hospitals, and elder care facilities as noise-sensitive receptors. The maximum interior exposure for these land uses is 45 dBA CNEL, with a maximum exterior exposure of 65 dBA CNEL.

Carson Municipal Code

Section 4101 (Unnecessary Noises) of Chapter I, Article IV of the Carson Municipal Code prohibits any disturbing, excessive, or offensive noise that causes discomfort or annoyance to any reasonable person of normal sensitivity residing in the community. Sections 4101(i) and 4101(j) of the Carson Municipal Code regulate noise from demolition and construction activities. These sections dictate that non-emergency construction activity (including demolition) and repair work can only occur between 7:00 a.m. and 6:00 p.m., Monday through Friday.

The City's Noise Control Ordinance (Section 5500 of the Carson Municipal Code) sets standards for noise levels throughout the City that are applicable to radios, phonographs, loudspeakers and amplifiers, electric motors or engines, animals, motor vehicles, and construction equipment. The Noise Ordinance also sets maximum limits on interior and exterior noise levels for each noise zone, unless exempted, as shown in Table 9. Additionally, when construction activities would have a duration greater than 21 days, Section 5502(c) of the Noise Control Ordinance requires that construction activities be conducted in such a manner to ensure that the noise level at an affected single-family residence does not exceed 65 dBA between 7:00 a.m. and 8:00 p.m. daily (except for Sundays and legal holidays when construction cannot occur), and 55 dBA between 8:00 p.m. and 7:00 a.m. on these same days.

Table 9. Noise Ordinance (Municipal Code) Standards

Noise Zone	Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level (dBA)	Interior Noise Level (dBA)
	Noise Sensitive Area	Anytime	45	N/A
11	Residential Properties	10:00 p.m. to 7:00 a.m. (nighttime)	45	N/A
		7:00 a.m. to 10:00 p.m. (daytime)	50	N/A

Noise Zone	Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level (dBA)	Interior Noise Level (dBA)
III	Commercial	10:00 p.m. to 7:00 a.m.	55	N/A
	Properties	7:00 a.m. to 10:00 p.m.	60	N/A
IV	Industrial Properties	Anytime	70	N/A
All Zones	Multifamily	10:00 p.m. to 7:00 a.m.	N/A	40
Open Space	Residential	7:00 a.m. to 10:00 p.m.	N/A	50

Table 9. Noise Ordinance (Municipal Code) Standards

Source: City of Carson 2004f.

Notes: dBA = A-weighted decibel; N/A = not applicable.

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?

Short-Term Construction Impacts

Less-than-Significant Impact. Construction of the project would generate noise that could expose nearby receptors to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction, distance between the noise source and receiver, and intervening structures. The following discussion addresses the noise levels calculated to result from construction of the project at nearby sensitive receptors (i.e., residences).

Construction – Equipment Inventory

CalEEMod was used to identify the construction equipment anticipated for development of the project. Based on this information, CalEEMod identified the anticipated equipment for each phase of project construction (see Table 1, Construction Scenario Assumptions).

On-Site Construction Noise

With the construction equipment noise sources identified in Table 1, a noise analysis was performed using the Federal Highway Administration's Roadway Construction Noise Model (RCNM) (FHWA 2008). Input variables for RCNM consist of the receiver/land use types, the equipment type (e.g., backhoe, grader, scraper), the number of equipment pieces, the duty cycle for each piece of equipment (i.e., percentage of time the equipment typically works in a given time period), and the distance from the noise-sensitive receiver to the construction zone. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this analysis. A conservative 5 dB of shielding⁸ was assumed in the modeling of construction noise at the park site. Refer to Appendix D for the inputs used in the RCNM model and the detailed results.

Noise-sensitive land uses exist southeast of the project site and farther to the south. The closest noisesensitive receivers consist of single-family residences located approximately 540 feet southeast of the project site, along the east side of Martin Street. The City's Noise Ordinance contains a construction noise

⁸ The minimum reduction achieved for a solid barrier that breaks the line-of-sight between a noise source and receiver is 5 dB. Multiple buildings break the line-of-sight between the park site to the southeast and the project site.

restriction that pertains specifically to single-family residences. Where construction would have a duration greater than 21 days, construction noise levels are restricted to 65 dBA L_{eq} during the daytime at any single-family residence in proximity of the construction effort (Section 5500 of the Carson Municipal Code).

The results of the construction noise analysis using the RCNM are summarized in Table 10 (refer to Appendix D for complete results). As shown, the noise levels from construction are predicted to range from approximately 58 dBA L_{eq} (during the trenching phase) to 62 dBA L_{eq} (during the paving phase) at the nearest noise-sensitive receivers (i.e., single-family residences located 540 feet from construction activities). These noise levels would be slightly lower than ambient noise levels in the area (64 dBA L_{eq} at ST1) and would be less than the 65 dBA L_{eq} construction noise standard. Therefore, short-term construction noise would be less than significant.

Table 10. Construction Noise Analysis Summary

	Construction Noise at Representative Receiver Distances (L_{eq} dBA)			
Construction Phase	Nearest Residence (Approximately 540 Feet)	Dolphin Park (Approximately 1,100 Feet)		
Trenching for Pipeline	58	47		
CNG Compound Installation	60	49		
Paving (if applicable, or site improvements)	62	51		

Source: Appendix D.

Notes: Leq = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibel; CNG = compressed natural gas.

Off-Site Construction Noise (Construction-Related Traffic)

Less-than-Significant Impact. It is anticipated that approximately 10 pick-up trucks would be traveling to and from the project site each day. Additionally, it is anticipated that typically there would be 13 construction workers on site per day, and during peak construction, there could be as many as 24 construction workers on site per day. The pipeline would be delivered via a road tractor over a 5-day period, and the concrete would be poured via 4 to 10 trucks per day over a 4-day period. During the civil import and excavation portion of the project there would be approximately 30 to 40 trips over a 1- to 2-week period. Designated delivery and haul routes for the project would be consistent with those currently used for fueling and other activities. Construction trucks and equipment would access the site at the Wilmington Avenue / Dominguez Street signalized intersection and proceed directly into the property.

The existing traffic volumes (City of Carson 2018) near the project site are much higher in comparison to these project-related trips. For example, Wilmington Avenue in the vicinity of the project site has an average daily traffic volume of 18,848 and Del Amo Boulevard has an average daily traffic volume of 17,444. Thus, the very small incremental increase associated with project-related construction would amount to a small fraction of a percentage point along project roadways. Based on the fundamentals of acoustics, a doubling (a 100% increase) would be needed to result in a 3 dB increase in traffic noise levels, which is the level corresponding to an audible change to the typical human listener (Caltrans 2020). Given that project construction would not measurably increase traffic volumes, and definitely would not double traffic volumes, on local roadways, no corresponding temporary increase in traffic noise levels would occur as a result of construction. Therefore, off-site construction noise impacts would be less than significant.

Long-Term Operational Impacts

Traffic Noise

No Impact. The project would enable the conversion of seven trucks from diesel-fueled engines to renewable CNG-fueled engines for the promotion of cleaner fuel usage. Once operational, the project would not result in additional truck trips or other vehicle trips to or from the project site. The proposed CNG dispensers would serve on-site existing truck traffic only. Furthermore, CNG-powered trucks are quieter than comparable diesel-powered trucks.⁹ Thus, there would be no impact related to operational traffic noise.

On-Site Operational Noise

Less-than-Significant Impact. The project would result in the installation of a 4-inch-diameter natural gas pipeline, three CNG dispensers, and a CNG system compound that would contain two compressors, one dryer, and two three-tube CNG storage tanks. The major noise source associated with this system would be the two (250-horsepower) compressors. The proposed CNG refueling facility would be operational 24 hours per day, 7 days a week.

The project site is zoned Manufacturing, Heavy (MH-D) with a General Plan land use designation of Heavy Industrial (City of Carson 2004a). Thus, the nature of the noise created by the project would be in keeping with the project site and surroundings and would be of a relatively low magnitude. Based on manufacturers' data (Ariel Corporation 2014), if both of the compressors were operated simultaneously in an "open" condition (i.e., without an enclosure), each with a 400-horsepower motor (which is larger than what is proposed, meaning that this is a conservative analysis that overstates the ultimate noise output), the combined noise level at the nearest noise-sensitive receiver would be approximately 43 dBA, which is less than the City's noise standard for residential land uses (50 dBA from 7:00 a.m. to 10:00 p.m., 45 dBA from 10:00 p.m. to 7:00 a.m.).

At the park, the noise level from the compressor stations would be approximately 31 dBA. For this project, the compressors would be unlikely to both be in operation at the same time; the compressors would be powered by a lower-powered (250-horsepower) motor; and each of the compressors would be housed in an enclosure, which would provide additional noise reduction. Therefore, on-site operational noise would be less than significant.

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

Less-than-Significant Impact. Operation of the project would include mechanical equipment that would produce negligible levels of groundborne vibration. Construction activities that might expose people to excessive groundborne vibration or groundborne noise could cause a potentially significant impact. Groundborne vibration information related to construction activities (including demolition) has been collected by the California Department of Transportation (Caltrans 2020), which indicates that continuous vibrations with a peak particle velocity of approximately 0.1 inches per second begins to annoy people. The heavier pieces of construction equipment, such as bulldozers, would have peak particle velocities of approximately 0.089 inches per second or less at a distance of 25 feet (FTA 2018).

Groundborne vibration is typically attenuated over short distances. At the distance from the nearest vibration-sensitive receivers (residences located to the southeast) to where construction activity would be

⁹ Based on information from Freightliner trucks, engines burning natural gas are up to 10 dB quieter than comparable dieselpowered engines (Freightliner 2020).

occurring on the project site (approximately 540 feet), and with the anticipated construction equipment, the peak particle velocity vibration level would be approximately 0.0009 inches per second. At the closest sensitive receptors, vibration levels would be well below the vibration threshold of potential annoyance of 0.1 inches per second; therefore, impacts associated with vibration-generated annoyance would be less than significant.

The major concern with regards to construction vibration is related to building damage, which typically occurs at vibration levels of 0.5 inches per second or greater for buildings of reinforced-concrete, steel, or timber construction. The highest anticipated vibration level associated with on-site project construction would be approximately 0.0006 inches per second, which is well below the threshold of 0.5 inches per second for building damage. Therefore, impacts associated with vibration-produced damage 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?

No Impact. The closest public airport to the project site is Long Beach, located approximately 5 miles east of the project site. The next-closest public airport is Compton/Woodley Airport Torrance Municipal Airport, which is located approximately 5.6 miles southwest of the project site. According to the Los Angeles County Airport Land Use Commission, the project is not located within the Airport Land Use Plan for these or other local airports. Additionally, the Noise Contour Map provides the 65 dBA CNEL contours of nearby airports, which are located more than 4 miles from the project site (ALUC 2004). The nearest private airstrip to the project site is the Goodyear Blimp Airship Base, located approximately 1.9 miles northwest of the project site. However, given the considerable distance between this airstrip and the project site and given that the Blimp Airship does not result in significant aircraft noise, no impacts associated with this private airstrip (AirNav 2021). Therefore, no impacts associated with airport and aircraft noise would occur.

3.14 Population and Housing

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV	POPULATION AND HOUSING – Would the proj.	ect:			
a)	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)?				
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				

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)?

No Impact. The project would involve installation of a 4-inch-diameter natural gas pipeline and associated structures. The project does not propose to construct new residences or establish new business, nor does it require facilities upsizing, such as widening of roads, that induce new, unplanned growth. Upon completion of construction, the project would be operated by existing staff at the ethanol loading rack, and no additional employees (some of which could theoretically move into the project area as a result of employment) would be needed. Therefore, the project would not induce any unplanned population growth in an area, either directly or indirectly. No impact would occur.

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

No Impact. The project site is located within the existing Shell Carson Distribution Complex with no existing residential structures present. The project would neither displace existing housing nor necessitate the construction of replacement housing. Therefore, no impacts would occur.

3.15 Public Services

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact		
XV.	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?			\boxtimes			
	Police protection?			\square			
	Schools?				\boxtimes		
	Parks?				\boxtimes		
	Other public facilities?				\boxtimes		

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?

Less-than-Significant Impact. Fire services for the City of Carson is provided by the Los Angeles County Fire Department (City of Carson 2000), which has six stations located within the City (see Table 11).

Station Number	Address
Fire Station 10	1860 E. Del Amo Boulevard
Fire Station 36	127 W. 223rd Street
Fire Station 95	127 Redondo Beach Boulevard
Fire Station 105	18915 South Santa Fe Avenue
Fire Station 116	755 E. Victoria Street
Fire Station 127	2049 E. 223rd Street

Table 11. Los Angeles County Fire Departments in the City of Carson

Source: City of Carson 2000

Once operational, the Los Angeles County Fire Department would continue to serve the project site. Additionally, as discussed in Section 3.14(a), the project would not result in substantial unplanned population growth in the City. Operation of the project would not affect the number of trucks or people accessing the site, and accordingly, is not anticipated to affect the number of calls for service to the project site. Overall, it is anticipated that the project would be adequately served by existing Los Angeles County Fire Department facilities, equipment, and personnel. Therefore, the project would not require the construction or expansion of fire protection service facilities, and impacts would be less than significant.

Police protection?

Less-than-Significant Impact. Police services are provided to the City of Carson by the Los Angeles County Sheriff's Department. There is one sheriff's station located in the City at 21356 South Avalon (City of Carson 2000).

Operation of the project would not affect the number of trucks or people accessing the site, and accordingly, is not anticipated to affect the number of calls for service to the project site. Overall, it is anticipated that the project would be adequately served by existing police facilities, equipment, and personnel. Therefore, the project would not require the construction or expansion of police protection facilities, and impacts would be less than significant.

Schools?

No Impact. As discussed in Section 3.14(a), the project would not result in any population growth in the City. Therefore, the project would not result in student generation. Because the project would not generate students, the project would not result in the need for expanded or new school facilities. Therefore, no impacts would be occur.

Parks?

No Impact. As further discussed in Section 3.16, Recreation, the project would not result in substantial population growth in the City. As such, an increase in patronage at park facilities is not expected. Additionally, the project would pay the required development impact fees as determined by the City's development impact fee schedule (City of Carson 2020). No impacts associated with the construction or expansion of park facilities would occur.

Other public facilities?

No Impact. As discussed in Section 3.14(a), the project would not result in substantial population growth in the City. As such, a substantial increase in patronage at libraries, community centers, and other public facilities is not expected. Therefore, no impacts associated with the construction or expansion of public facilities would occur.

3.16 Recreation

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV	I. 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?				
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?				

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?

No Impact. The project would not result in substantial population growth in the City. Further, the project would not promote or indirectly induce new development that would require the construction or expansion of recreational facilities. Because the project would not result in substantial population growth in the City, it would not increase the demand for recreational facilities. Additionally, the project would pay the required development impact fees as determined by the City's development impact fee schedule (City of Carson 2020). As such, no impacts would occur.

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?

No Impact. See response in Section 3.16(a).

3.17 Transportation

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI	I. TRANSPORTATION – Would the project:				
a)	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				
b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			\boxtimes	
C)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
d)	Result in inadequate emergency access?				\square

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

Less-than-Significant Impact. The project would involve construction and operation of a CNG dispensing station at the ethanol fueling rack facility within the Shell Carson Distribution Complex. The purpose of the project is to enable the conversion of seven ethanol tanker delivery trucks from diesel fuel to renewable CNG fuel. Construction of the project would result in trucks entering and exiting the Shell Carson Distribution Complex. However, these trips would be nominal in quantity in the context of the City's circulation system (i.e., approximately 24 construction workers accessing the site daily, in addition to 4 to 10 trucks per day, plus 30 to 40 trips over a 1- to 2-week period). Additionally, designated delivery and haul routes for the project would be consistent with those currently used for fueling and other activities. Construction trucks and equipment would access the site at the Wilmington Avenue / Dominguez Street signalized intersection and proceed directly into the property. Given the nominal quantity of truck trips that construction would generate, and given that these trips would use designated routes that are already used for delivery and haul routes, construction of the project would not result in a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

With regard to project operation, as discussed in Section 2.3, Environmental Setting, the project would be designed in compliance with requirements set forth in DOR 764-01, which limits truck traffic to and from the ethanol fueling terminal. The current limit is a maximum of 210 trucks per day, with a maximum annual average of 195 trucks per day. Additionally, all ethanol tanker trucks are mandated to exit the facility onto Wilmington Avenue heading north to Del Amo Boulevard and then east to Alameda Street, avoiding residential areas. Because the project would only enable the conversion of exiting delivery trucks from diesel fuel to renewable CNG fuel, and because the DOR limits the number of trucks that can enter the facility, the project would have no impact on the local circulation system. Additionally, the project would be

entirely located within the Shell Carson Distribution Complex, and its construction or operation would not temporarily or permanently result in any modifications (e.g., reconfiguration or restriping) to existing circulation facilities.

Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

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

Less-than-Significant Impact. CEQA Guidelines Section 15064.3(b) focuses on vehicle miles traveled, adopted pursuant to SB 743 for determining the significance of transportation impacts. Pursuant to SB 743, the focus of transportation analysis now uses vehicle miles traveled. According to the technical guidance provided in the Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018), a project may be presumed to have a less-than-significant impact with regard to vehicle miles traveled if it results in the generation of less than 110 trips per day.

As discussed in Section 3.17(a), because the project would only enable the conversion of exiting delivery trucks from diesel fuel to renewable CNG fuel, and because the DOR limits the number of trucks that can enter the facility, the project would not result in the generation of any new trips per day. As such, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and 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)?

No Impact. The project would be entirely located within the Shell Carson Distribution Complex, and its construction or operation would not temporarily or permanently result in any modifications (e.g., reconfiguration or restriping) to existing circulation facilities. During project operation, trucks would continue to use existing truck routes, pursuant to the regulations provided in DOR 764-01. Therefore, the project would have no impact.

d) Would the project result in inadequate emergency access?

No Impact. The project would be entirely located within the Shell Carson Distribution Complex, and upon construction, traffic would continue to use the same driveway and internal drive aisles and access roads being used under existing conditions. The project would not design or construct any new driveways, drive aisles, or internal access roads. These existing ingress/egress and circulation facilities currently comply, and will continue to comply, with fire code requirements for width, grade, clearance, dead-end length, and turnarounds. Therefore, the project would not result in inadequate emergency access, and no impacts would occur.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse ch in Public Resources Code section 21074 as eithe geographically defined in terms of the size and so value to a California Native American tribe, and th	r a site, feature, ope of the lands	place, cultural la	ndscape 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), or 				
 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? 				

- a) 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:
 - i) 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)?

Less-than-Significant Impact. As previously discussed in Section 3.5(a), the project site does not contain any resources that are either listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Section 5020.1(k). Impacts would be less than significant.

 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?

Less-than-Significant Impact with Mitigation Incorporated. The project is subject to compliance with AB 52 (PRC Section 21074), which requires consideration of impacts to tribal cultural

resources as part of the CEQA process. AB 52 requires the City, as the lead agency responsible for CEQA compliance for the project, to notify any groups of the project who have requested notification and who are traditionally or culturally affiliated with the geographic area of the project. Because AB 52 is a government-to-government process, all records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City. In accordance with AB 52, on December 8, 2020, the City sent notification letters to the tribal representatives who formally requested such notice under AB 52. To date, one response from the Gabrieleno Band of Mission Indians – Kizh Nation was received. On February 3, 2021, the City consulted with the Gabrieleno Band of Mission Indians – Kizh Nation. During consultation, the Gabrieleno Band of Mission Indians-Kizh Nation requested that tribal cultural resource monitoring occur during construction activities.

Despite the disturbed nature of the project area and the fact that the archaeological sensitivity of the project site is considered to be low, the City is committed to preserving the integrity of cultural resources. Thus, in response to the requests for construction monitoring, 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. With the incorporation of MM-TCR-1, along with MM-CUL-1 and MM-CUL-2, impacts associated with any potential buried, currently unrecorded/unknown tribal cultural resources would be less than significant.

Implementation of MM-TCR-1, along with MM-CUL-1 through MM-CUL-2, outlined in Section 3.5, would ensure that impacts to tribal cultural resources would be less than significant.

MM-TCR-1 Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain a Native American Monitor approved by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this project pursuant to Assembly Bill 52 (the "Tribe" or the "Consulting Tribe"). A copy of the executed contract shall be submitted to the City of Carson Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area.

The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor approved by the Consulting Tribe. If the resources are

Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.

If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]).

If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

The tribal monitor and any other site visitors must adhere to all site HSSE (Health, Safety, Security, Environmental) rules including COVID precaution measures.

3.19 Utilities and Service Systems

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact		
XIX	XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:						
a)	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?						
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?						

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
C)	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?				
d)	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)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				

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?

Water

Less-than-Significant Impact. The California Water Service Company and the Southern California Water Company provide water service to the City (City of Carson 2004d). The project would install a 4-inch-diameter natural gas pipeline and facilities to dispense CNG at the Shell Carson Distribution Terminal. The project would not generate a demand for water. As addressed in Section 3.14, Population and Housing, the project would not generate population growth, and thus would not require additional water supplies. In addition, the project would not involve any new water connections. Therefore, the project would not require or result in the relocation or construction of new or expanded water facilities. Impacts would be less than significant.

Wastewater

Less-than-Significant Impact. The Los Angeles County Public Works Department maintains the local sewer lines that run in the street to the trunk sewer lines, as well as two lift stations, Scottsdale Pump Station (23426 Avalon Boulevard) and Belshaw Pump Station (22650 Belshaw Avenue). The Los Angeles County Sanitation District maintains the trunk sewer lines within the City (City of Carson 2004d). The Joint Water Pollution Control Plant provides sewage treatment and disposal to the City, and provides primary and partial secondary treatment for 350 million gallons per day (City of Carson 2004d).

The project would involve installation of a 4-inch-diameter natural gas pipeline and facilities to dispense CNG at the Shell Carson Distribution Terminal. The project would not involve additional sewer-generating uses. The project would not increase the capacity of the wastewater system, and would not result in the construction of new or expanded wastewater facilities. Further, the project itself would not generate

wastewater. Therefore, impacts related to the construction of new or expanded wastewater treatment facilities would be less than significant.

Stormwater

Less-than-Significant Impact. The project would be constructed within the existing Shell Carson Distribution Complex. The ethanol loading rack and its surrounding area are currently connected to the existing stormwater management system and would continue to be connected to the existing system after construction is completed. As discussed in Section 3.10, Hydrology and Water Quality, the project would not create or contribute runoff water that would exceed the capacity of existing drainage systems or substantially change the amount of stormwater runoff from the project site and surrounding area. Therefore, the project would not require or result in the relocation or construction of new or expanded stormwater drainage facilities. Impacts would be less than significant.

Electric, Natural Gas, and Telecommunication Facilities

Less-than-Significant Impact. The project would be located entirely within the Shell Carson Distribution Complex, which is currently served by electric, natural gas, and telecommunication facilities.

As discussed in Section 3.6, Energy, temporary electric power would be used during construction for asnecessary lighting and electric equipment. During construction, natural gas would typically not be consumed on the project site. The amount of electricity used during construction would be minimal because typical energy demand stems from the use of electrically powered equipment. This electricity demand would be temporary and would cease upon completion of construction; therefore, project construction would not require new or expanded electric power facilities.

As part of the project, electrical and telecommunication would connect to the project components from their existing locations within the ethanol loading terminal. However, no expansion of these facilities would be required.

The project would expand the throughput of CNG, a clean fuel alternative to gasoline and diesel for on-road vehicle operations. Thus, the project itself would involve construction of a natural gas facility; however, impacts associated with construction and operation have been evaluated throughout this IS/MND, and no significant impacts would result.

In summary, impacts associated with electrical, natural gas, and telecommunication 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?

No Impact. The project would not generate demand for water. As addressed in Section 3.14, the project would not generate population growth, and thus, would not require additional water supplies. The project would continue to operate under current conditions. Although construction would require water usage, the duration of that usage would be short term, and the amount required would be minimal. Therefore, no impacts related to water supplies would occur.

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?

No Impact. The existing project site has adequate water supply capacity with existing entitlements and resources. The project would not increase the capacity of the wastewater system and would not generate additional wastewater. Water would be required during construction; however, the amount required would be nominal and temporary. Operations of the project would not generate demand for water. Therefore, the project would have no impacts regarding sufficient water supplies.

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?

Less-than-Significant Impact. The waste produced during construction is expected to be minimal, and the construction contractor would be required to dispose of solid waste in accordance with local solid waste requirements. The project itself would be required to meet the 50% diversion rate required under California law.

Waste Management currently provides residential, commercial, and industrial waste collection service for the City of Carson. Waste Management collects approximately 70,000 tons from residential customers and 153,500 tons from commercial and industrial customers per year. The solid waste collected by Waste Management is transported to the company's transfer station at 321 W. Francisco Street in Carson, where it is sorted. The 10-acre facility has a permitted capacity of 5,300 tons per day. The El Sobrante Landfill currently has a capacity of 7,500 tons per day. Its current life expectancy is 100 years (City of Carson 2004d). The waste from the project site is anticipated to be diverted to these sites, and the landfill would have sufficient capacity to accommodate the project's disposal needs.

Once operational, any solid waste generated by the project would be minimal. The project would not generate ongoing solid waste in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts 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?

No Impact. The project would only generate waste during project construction. The construction contractor would be required to dispose of all construction waste as required by standard local specifications and any applicable federal and state requirements. The project is required to comply with local, state, and federal regulations. Therefore, the project would comply with federal, state, and local reduction statutes and regulations related to solid waste, and there would be no impacts.

3.20 Wildfire

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact	
XX.	XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?					
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?					
c)	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)	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?					

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

No Impact. According to CAL FIRE, the project site is not located in an HFSZ (CAL FIRE 2021). The project site and surrounding area is characterized as developed and industrial, which would not facilitate the spread of wildfires compared to vegetated areas. Additionally, the project's operations would not require a substantial increase of employees on site, the level of traffic would remain consistent with existing levels of traffic to and from the project site, and the project would not impede emergency vehicle circulation. Implementation of the project would not interfere with an adopted emergency response plan or emergency evacuation plan. No impacts would occur.

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?

No Impact. According to CAL FIRE, the project site is not located in an HFSZ (CAL FIRE 2021). The project site and surrounding area is characterized as developed and industrial, which would not facilitate the spread of wildfires compared to vegetated areas. No incising of hillslopes or degradation of slope stability would occur as a result of project construction. The project site and the immediate surrounding area is relatively flat and does not contain slopes typical of exacerbating wildfire risks.

The project would involve installation of a 4-inch-diameter natural gas pipeline and facilities to dispense CNG at the Shell Carson Distribution Terminal. The project site contains flammable material. The project would be required to implement safety measures to reduce potential for the flammable gas to exacerbate wildfire risks. Specifically, Title 32, Fire Code, of Los Angeles County's Municipal Code requires outdoor stationary CNG tanks for dispensing to be stored within gas cabinets or exhaust enclosures (Section 5003.8.5.2.1). In addition, Section 105.6.17 of the Fire Code requires an operational permit for flammable and combustible liquids. Incorporation of appropriate fire safeguards would further reduce the potential of the project to exacerbate wildfire risks.

Therefore, it is not anticipated that the project, due to slope, prevailing winds, and other factors, would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impacts would occur.

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?

No Impact. As previously discussed, according to CAL FIRE, the project site is not located in an HFSZ (CAL FIRE 2021). The project would involve installation of a 4-inch-diameter natural gas pipeline and facilities to dispense CNG at the Shell Carson Distribution Terminal. These installations would be located in already developed areas. Thus, it is not anticipated that the project would exacerbate fire risk. The potential environmental impacts associated with the installations have been evaluated throughout this IS/MND and would not exacerbate wildfire risk or result in significant impacts to the environment. No impacts would occur.

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?

No Impact. As previously discussed, according to CAL FIRE, the project site is not located in an HFSZ (CAL FIRE 2021). The project site and surrounding area are characterized as developed and industrial, which would not facilitate the spread of wildfires compared to vegetated areas. As a result, no incising of hillslopes or degradation of slope stability would occur because of project construction.

In addition, as discussed in Section 3.10, Hydrology and Water Quality, runoff would continue to go toward existing storm drain infrastructure, and the project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site. Due to the relatively flat project site, and the fact that the site is paved with existing development, it is unlikely that the project would exposed people or structures to downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. No impacts would occur.

3.21 Mandatory Findings of Significance

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact		
XX	XXI. 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?						
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)?						
C)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?						

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 selfsustaining 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?

Less-than-Significant Impact with Mitigation Incorporated. As discussed in Section 3.4, Biological Resources, the project site is entirely developed and characterized by disturbed areas. No natural vegetation communities are present within the impact footprint. Due to the urbanized nature of the project site, and the absence of wetlands located on site, the project would not result in substantial adverse effects on state or federally protected wetlands. In regards to impacts to migratory bird species and sensitive species, the project would implement MM-BIO-1 and MM-BIO-2 to ensure potential impacts to sensitive species and nesting birds from construction-related activities would be less than significant.

Regarding impacts related to important examples of the major periods of California history or prehistory, as further discussed in Section 3.5, Cultural Resources; Section 3.7, Geology and Soils; and Section 3.18,

Tribal Cultural Resources, the project would not impact cultural or paleontological resources as defined by the CEQA Guidelines, and would not disturb human remains. However, it is always possible that intact deposits could be present at subsurface levels. For this reason, the project site should be treated as potentially sensitive for cultural and paleontological resources. Therefore, MM-CUL-1, MM-CUL-2, MM-GEO-1, and MM-TRC-1 would be implemented to reduce potential impacts to unanticipated archaeological resources to **less than significant**

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)?

Less-than-Significant Impact with Mitigation Incorporated. When evaluating cumulative impacts, it is important to remain consistent with Section 15064(h) of the CEQA Guidelines, which is as follows:

- (1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.
- (2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.
- (3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified

plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the project's incremental effects are cumulatively considerable.

With this stated, as addressed herein, the project would potentially result in project-related impacts to biological resources, cultural resources, paleontological resources, and tribal cultural resources that could be potentially significant without the incorporation of mitigation. Thus, when coupled with similar impacts related to the implementation of other cumulative projects located throughout the broader project area, the project would potentially result in cumulative-level impacts if these significant impacts are left unmitigated.

However, with the incorporation of mitigation identified within this IS/MND, the project's individual-level impacts would be reduced to less-than-significant levels and would not considerably contribute to cumulative impacts in the greater project region. Additionally, these other related projects would presumably be bound by their applicable lead agency to comply with the all applicable federal, state, and local regulatory requirements, and incorporate all feasible mitigation measures, consistent with CEQA, to further ensure that their potentially cumulative impacts would be reduced to less-than-significant levels.

Although cumulate impacts are always possible, the project, by incorporating all mitigation measures outlined herein, would reduce its contribution to any such cumulative impacts to less than cumulatively considerable. Therefore, with incorporation of mitigation, the project would result in individually limited, but not cumulatively considerable, impacts.

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

Less-than-Significant Impact with Mitigation Incorporated. As evaluated throughout this document, with implementation of mitigation measures, environmental impacts associated with the project would be reduced to less-than-significant levels. Thus, the project would not directly or indirectly cause substantial adverse effects on human beings, and impacts would be less than significant.

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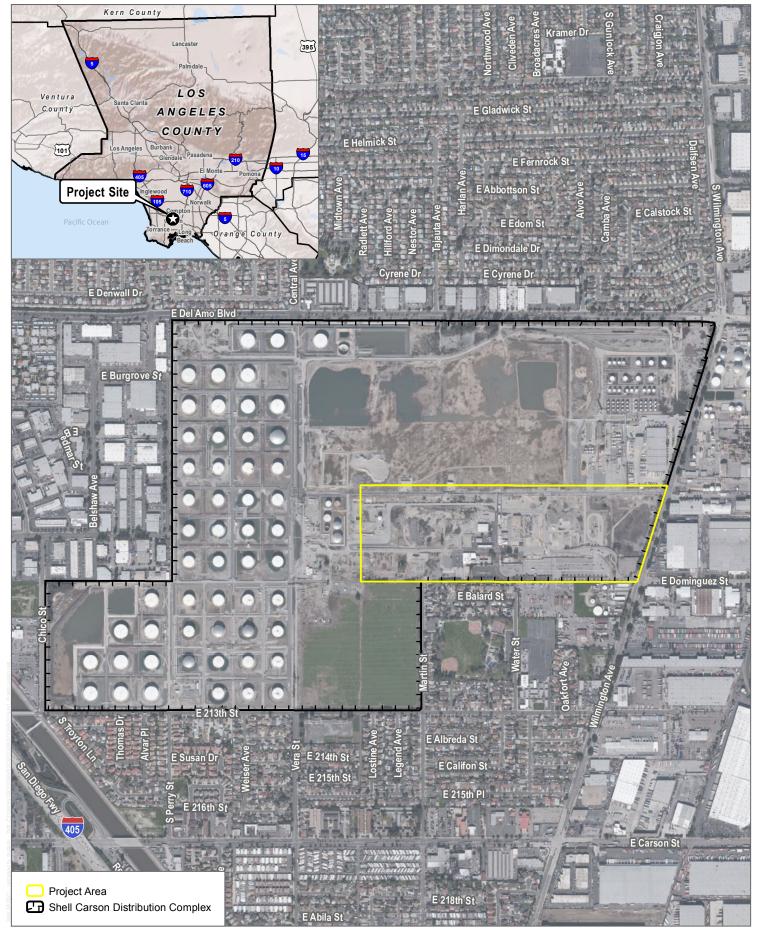
4.2 List of Preparers

City of Carson

Max Castillo, Assistant Planner

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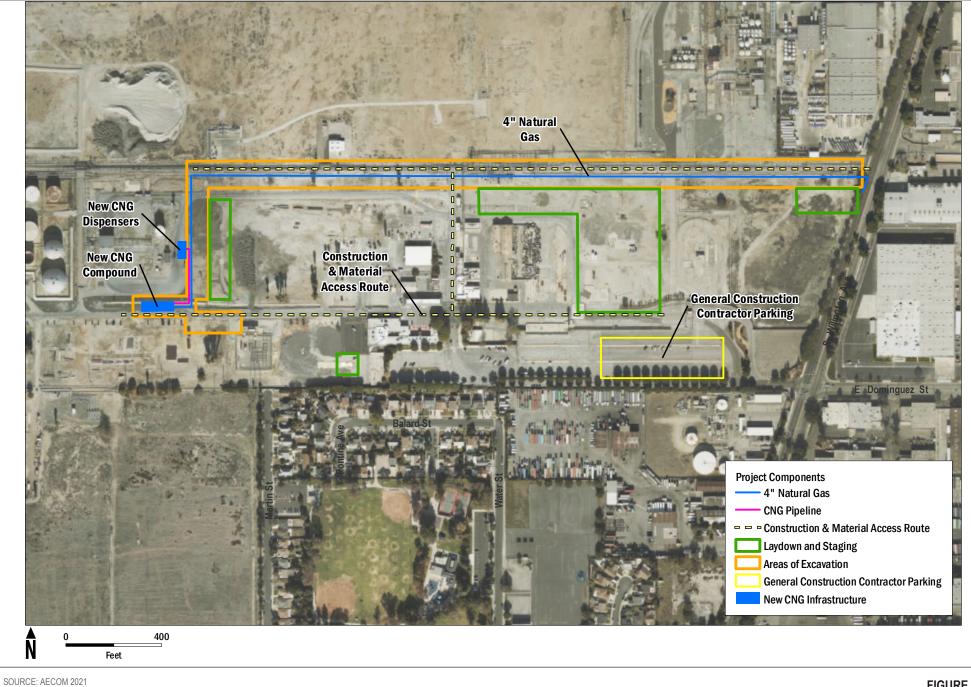
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SOURCE: Bing Maps 2021; Open Street Map 2019



FIGURE 1 Project Location Shell Compressed Natural Gas Dispensing Station



DUDEK



1) Approximate loation of connection to SoCal natural gas main near Wilmington, view north



2) Eastern terminus of existing pipe rack near Wilmington Avenue, view east



3) Existing driveway crossing in a precast trench with grate covering, view east



4) Existing east/west pipe rack that will convey the 4-inch natural gas line, view north



5) Location of two CNG dispenses and additional pavement, view east



SOURCE: Shell 2020

FIGURE 3A Existing Site Photos and Typical Equipment Photos Shell Compressed Natural Gas Dispensing Station



Typical CNG system compound, 2 compressors and 3 tanks



CNG dryer, located in the CNG system compound



Typical CNG dispenser

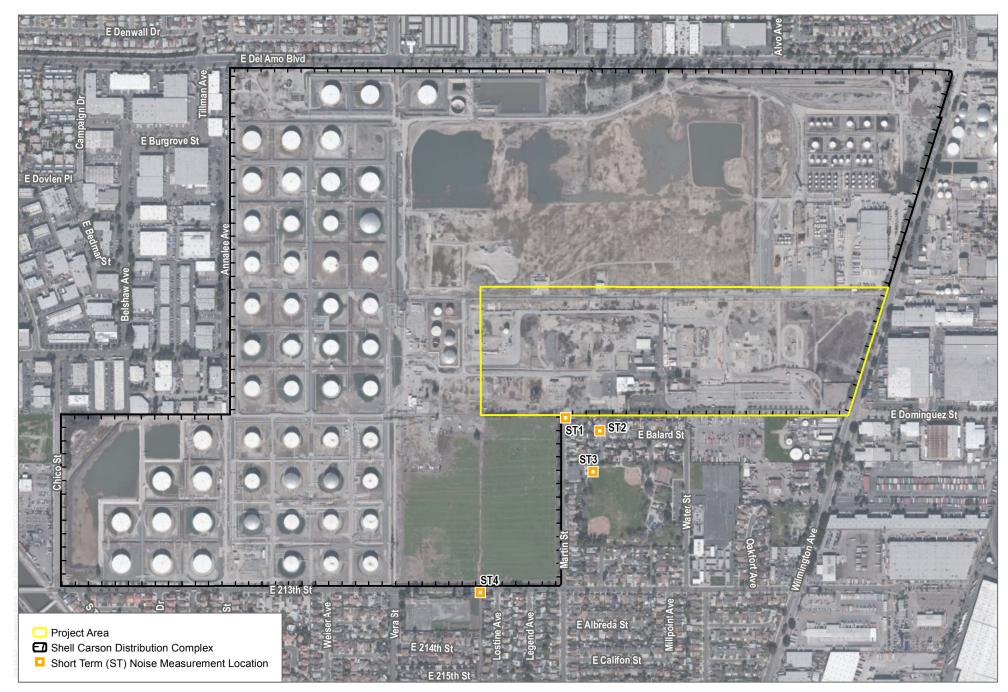


Canopy Rendering

SOURCE: Shell 2020

DUDEK

FIGURE 3B Existing Site Photos and Typical Equipment Photos Shell Compressed Natural Gas Dispensing Station



SOURCE: Bing Maps 2021; Open Street Map 2019

FIGURE 4 Noise Measurement Locations Shell Compressed Natural Gas Dispensing Station



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