AVALON INDUSTRIAL CENTER
ADMINISTRATIVE DRAFT INITIAL STUDY

PREPARED FOR:
City of Carson
Economic Development Services Department, Planning Division
701 E Carson Street
Carson, California 90745

APPLICANT:
Trammell Crow Company
2049 Century Park East, Suite 2600
Los Angeles, CA 90067

PREPARED BY:
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1. INTRODUCTION

The subject of this Initial Study (IS) is the proposed Avalon Industrial Center (the "proposed project"). The proposed project consists of the development of up to 230,000 square feet of industrial warehouse space and associated improvements on an approximately 11.67 acre site in the City of Carson. The site is currently largely undeveloped with the exception of an approximately 8,000 square foot vacant industrial building. The project site is located in the City of Carson within the Carson Consolidated Redevelopment Project Area. The project applicant is the Trammell Crow Company. A detailed description of the proposed project is contained in Section II (Project Description). The City of Carson (Economic Development Department, Planning Division) is the Lead Agency under the California Environmental Quality Act (CEQA).

2. PROJECT INFORMATION

Project Title: Avalon Industrial Center

Project Applicant: Trammell Crow Company, 2049 Century Park East, Suite 2600, Los Angeles, CA 90067

Project Location: 16325 Avalon Boulevard, Carson, California

Lead Agency: City of Carson
701 E Carson Street
Carson, CA 90745

3. PURPOSE AND ORGANIZATION OF THE INITIAL STUDY

This Initial Study is a preliminary analysis prepared by and for the City of Carson as Lead Agency to identify the potential environmental impacts of a proposed project.

CEQA Guidelines Section 15063 states:

> (a) The Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.
>
> (1) All phases of project planning, implementation, and operation must be considered in the Initial Study of the project.
>
> (2) The lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.
>
> (3) An initial study may rely upon expert opinion supported by facts, technical studies or other substantial evidence to document its findings. However, an initial study is neither intended nor required to include the level of detail included in an EIR.

(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall do one of the following:

(A) Prepare an EIR, or

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plan described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document prepared under a State certified regulatory program. The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

(c) Purposes. The purposes of an Initial Study are to:

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

(3) Assist in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

(B) Identifying the effects determined not to be significant,

(C) Explaining the reasons for determining that potentially significant effects would not be significant, and

(D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs; and

(7) Determine whether a previously prepared EIR could be used with the project.

(d) Contents. An Initial Study shall contain in brief form:

(1) A description of the project including the location of the project;

(2) An identification of the environmental setting;

(3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.

(4) A discussion of the ways to mitigate the significant effects identified, if any;

(5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and

(6) The name of the person or persons who prepared or participated in the Initial Study.

Specifically, this Initial Study is being used by the Lead Agency to determine, in accordance with Guidelines Section 15063(b), and pursuant to a program EIR, tiering, or another appropriate process, which of the proposed project's effects were adequately examined by an earlier EIR or negative declaration and ascertain which effects, if any, should be analyzed in a later EIR or negative declaration. The effects of future development within the City of Carson to the year 2020 were evaluated in a program EIR that was prepared for the Carson General Plan (the “General Plan EIR”) in October, 2002 and recirculated in part in July, 2003. The General Plan EIR was certified by the City of Carson in October, 2005.

The proposed project is consistent with the General Plan land use designation for the project site. This Initial Study identifies potential environmental effects that could be associated with the proposed project and compares those effects to the effects identified in the General Plan EIR for future development projects in the City of Carson. The Initial Study has been structured to evaluate whether the proposed project would require preparation of a supplemental or subsequent EIR, based on this comparison.

In accordance with CEQA Guidelines Section 15162, when an EIR has been certified for a project, no subsequent EIR shall be required unless one of the following occurs:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects of a substantial increase in the severity of previously identified significant effects;

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative;

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but project proponents decline to adopt the mitigation measure or alternative.

4. ORGANIZATION OF THE INITIAL STUDY

This Draft Initial Study is organized into six sections as follows:

Introduction: This Section provides introductory information such as the project title, the Project Applicant, and the designated Lead Agency for the Proposed Project.

Initial Study Checklist: This Section contains the completed IS Checklist showing the significance level under each environmental impact category.

Project Description: This Section provides a detailed description of the Proposed Project including the environmental setting, project characteristics, related project information, project objectives, and environmental clearance requirements.

Environmental Impact Analysis: This Section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist. Where the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Preparers of the Initial Study and Persons Consulted: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

Acronyms and Abbreviations: This Section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

As discussed in the sections which follow, the analysis demonstrates that the proposed project would not involve substantial changes that would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the General Plan EIR. In addition, the analysis demonstrates that there will be no substantial changes with respect to the circumstances under which the project would be undertaken that would result in new significant environmental effects and no substantial increase in the severity of significant effects previously identified in the Certified EIR. Finally, the analysis demonstrates that new information of substantial importance meeting the criteria of Guidelines Section 15162(a)(3) would not occur. Thus, in accordance

with the State CEQA Guidelines, preparation of a subsequent EIR to address the proposed project would not be required.

II. INITIAL STUDY CHECKLIST

PROJECT INFORMATION

1. **Project Title:** Avalon Industrial Center

2. **Lead Agency name and address:**

   City of Carson, Economic Development Services Department, Planning Division
   701 E Carson Street
   Carson, CA 90745

3. **Contact person and phone number:** Steven Newberg, AICP, Associate Planner, (310) 952-1700

4. **Project location:** The project site is located at 16315-25 Avalon Boulevard on the west side of the street between Alondra and Gardena Boulevards. The Project Site is 508,384 square feet (approximately 11.67 acres) in size and is roughly rectangular in shape, with a small flag lot providing access from Gardena Boulevard. The Assessor Parcel Numbers (APN) associated with the project site are 6125-013-018, 6125-013-025 and 6125-013-026. The location of the project site is depicted in Figure III-1, Regional and Project Vicinity Map, in Section III, Project Description, of this Initial Study.

5. **Project sponsor's name and address:**

   Trammell Crow Company
   2049 Century Park East, Suite 2600
   Los Angeles, CA 90067

6. **General plan designation:** Light Industrial

7. **Zoning:** ML-D

8. **Redevelopment Plan:** City of Carson Consolidated Project Area

9. **Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)**

   See Section III, Project Description.

10. **Surrounding land uses and setting: Briefly describe the project's surroundings:**

    See Section III, Project Description.

Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participation agreement)

This Initial Study is intended to be the primary reference document in the formulation and implementation of a mitigation monitoring and reporting program for the Proposed Project. This Initial

Study is also intended to cover all federal, State, regional and/or local government discretionary approvals that may be required for the Proposed Project, whether or not they are explicitly listed below.

The proposed project would require approvals and permits from the City of Carson (see Section III, Project Description). Other reviewing agencies may include:

- South Coast Air Quality Management District.
- Regional Water Quality Control Board.

☞ **DETERMINATION (To be completed by Lead Agency)**

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 on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

❑ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

❑ I find 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 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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project and identified in this Initial Study, nothing further is required.

_____ _____

SIGNATURE **TITLE**

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 EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "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 Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must 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:

   1) Earlier Analysis Used. Identify and state where they are available for review.
   2) 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.
   3) 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 sources 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 whichever format is selected.

9) The explanation of each issue should identify:

1) The significance criteria or threshold, if any, used to evaluate each question; and
2) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

☞ **ENVIRONMENTAL IMPACTS** (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	**AESTHETICS.** Would the project:				
a.	Have a substantial adverse effect on a scenic vista?	❑	❑	☒	❑
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	❑	❑	❑	☒
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	❑	❑	☒	❑
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	❑	☒	❑	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
2.	**AGRICULTURE AND FOREST 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, 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 1220(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?	❑	❑	❑	☒
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?	❑	❑	❑	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3.	**AIR QUALITY.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a.	Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	❑	❑	☒	❑
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	❑	❑	☒	❑
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard?	❑	❑	☒	❑
d.	Expose sensitive receptors to substantial pollutant concentrations?	❑	❑	☒	❑
e.	Create objectionable odors affecting a substantial number of people?	❑	❑	☒	❑
4.	**BIOLOGICAL RESOURCES.** Would the project:				
a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations 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 the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	❑	❑	❑	☒
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	❑	❑	❑	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	❑	❑	❑	☒
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?	❑	❑	❑	☒
5. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?	❑	❑	☒	❑
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?	❑	☒	❑	❑
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	❑	☒	❑	❑
d. Disturb any human remains, including those interred outside of formal cemeteries?	❑	❑	☒	❑
6. GEOLOGY AND SOILS. Would the project:				
a. Exposure of people or structures to 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?	❑	❑	☒	❑

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
iii. Seismic-related ground failure, including liquefaction?	❑	❑	☒	❑
iv. Landslides?	❑	❑	❑	☒
b. Result in substantial soil erosion or the loss of topsoil?	❑	❑	☒	❑
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential 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 risks to life or property?	❑	❑	☒	❑
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?	❑	❑	❑	☒
7. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	❑	❑	☒	❑
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	❑	❑	☒	❑
8. HAZARDS AND HAZARDOUS MATERIALS. Would 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?	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	Be located on a site which 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 for people residing or working in the project area?	❑	❑	☒	❑
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	❑	❑	❑	☒
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	❑	❑	❑	☒
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	❑	❑	❑	☒
9.	**HYDROLOGY AND WATER QUALITY.** Would the proposal result in:				
a.	Violate any water quality standards or waste discharge requirements?	❑	☒	❑	❑
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	❑	❑	☒	❑
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	❑	☒	❑	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site?	❑	❑	☒	❑
e.	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?	❑	☒	❑	❑
f.	Otherwise substantially degrade water quality?	❑	❑	☒	❑
g.	Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	❑	❑	❑	☒
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	❑	❑	❑	☒
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	❑	❑	❑	☒
j.	Inundation by seiche, tsunami, or mudflow?	❑	❑	☒	❑
10.	**LAND USE AND PLANNING**. Would the project:				
a.	Physically divide an established community?	❑	❑	☒	❑
b.	Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	❑	❑	☒	❑
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	❑	❑	❑	☒
11.	**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?	❑	❑	❑	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	❑	❑	❑	☒
12.	**NOISE.** Would the project:				
a.	Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	❑	☒	❑	❑
b.	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	❑	❑	☒	❑
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	❑	❑	☒	❑
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	❑	☒	❑	❑
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 expose people residing or working in the project area to excessive noise levels?	❑	❑	❑	☒
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	❑	❑	❑	☒
13.	**POPULATION AND HOUSING**. Would the project:				
a.	Induce substantial 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 housing necessitating the construction of replacement housing elsewhere?	❑	❑	❑	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	❑	❑	❑	☒
14.	**PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:				
a.	Fire protection?	❑	❑	☒	❑
b.	Police protection?	❑	❑	☒	❑
c.	Schools?	❑	☒	❑	❑
d.	Parks?	❑	❑	☒	❑
e.	Other governmental services (including roads)?	❑	❑	☒	❑
15.	**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?	❑	❑	☒	❑
16.	**TRANSPORTATION/CIRCULATION**. Would the project:				
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?				
b.	Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	❑	❑	☒	❑
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	❑	❑	❑	☒
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	❑	❑	☒	❑
e.	Result in inadequate emergency access?	❑	❑	❑	☒
f.	Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	❑	❑	☒	❑
17.	**UTILITIES.** Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	❑	❑	❑	☒
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	❑	❑	☒	❑
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	❑	❑	❑	☒
d.	Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	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?	❑	❑	☒	❑
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	❑	❑	☒	❑
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	❑	❑	☒	❑
18.	**MANDATORY FINDINGS OF SIGNIFICANCE.**				
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	❑	❑	❑	☒
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual 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 cause substantial adverse effects on human beings, either directly or indirectly?	❑	☒	❑	❑

☞ **DISCUSSION OF THE ENVIRONMENTAL EVALUATION** **(Attach additional sheets if necessary)**

PREPARED BY	TITLE	TELEPHONE #	DATE

III. PROJECT DESCRIPTION

1. ENVIRONMENTAL SETTING

A. Project Location

The 508,384 square foot (approximately 11.67 acre) project site is located at 16325 Avalon Boulevard in the City of Carson (see Figure III-1 [Regional and Project Vicinity Map] and Figure III-2 [Aerial View of the Project Site]). The project site encompasses all of the addresses and assessor parcel numbers (APNs) listed in Table III-1 (Project Site Addresses and Assessor Parcel Numbers).

Table III-1

Project Site Addresses and Assessor Parcel Numbers

Address	APN	Use
16315 S Avalon Boulevard	6125-013-026	Vacant
16325 S Avalon Boulevard	6125-013-025	Vacant
455 E Gardena Boulevard	6125-013-018	Vacant Industrial

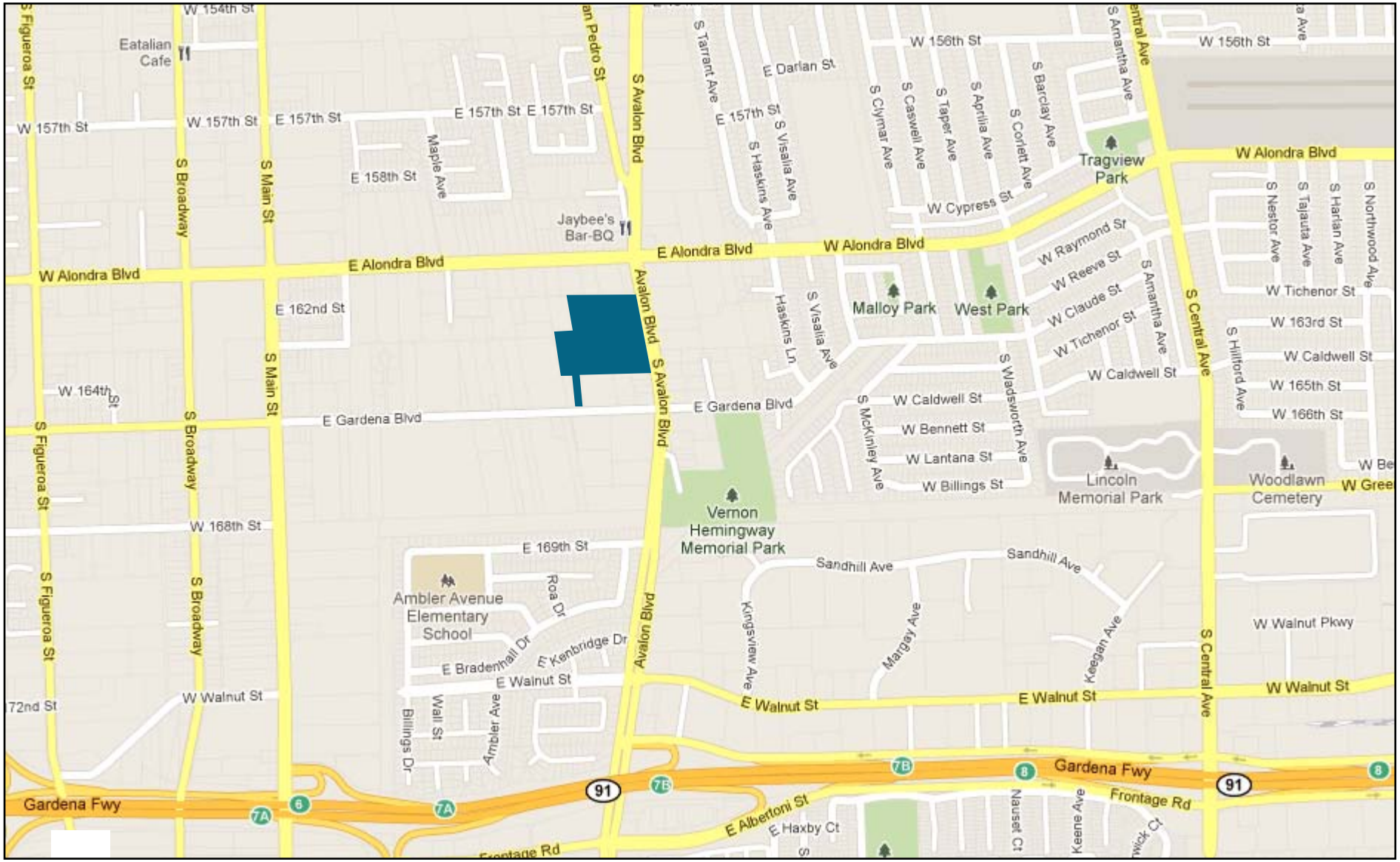
The project site is bounded by Avalon Boulevard on the east and by existing development on the north, east and south. Regional access to the project site is provided by the Harbor Freeway (SR-110/I-110), approximately one mile west of the project site, and the Artesia/Gardena Freeway (SR-91) approximately 0.75 miles south. Local access to the project site is provided by, but is not limited to, the following roadways: Avalon Boulevard, Gardena Boulevard and Alondra Boulevard.

B. Description of Surrounding Area

The project site is located in an urbanized setting characterized primarily by industrial uses, with a limited number of commercial uses. The industrial uses range from small, one-story buildings to larger, one- and two-story light industrial and warehouse buildings located along Avalon Boulevard, Gardena Boulevard and Alondra Boulevard. A car wash with mini-mart is located adjacent to the northern boundary of the project site, and a small retail center is located at the northwest corner of the intersection of Avalon and Alondra Boulevards. A mobile home park is located adjacent to the project site at the western boundary. The mobile home park is located on a site that is designated in the General Plan and zoned for light industrial use. The City considers this use to be a legal non-conforming use. Various photographs of the project site and its immediate surroundings are shown in Figures III-3 through III-5.

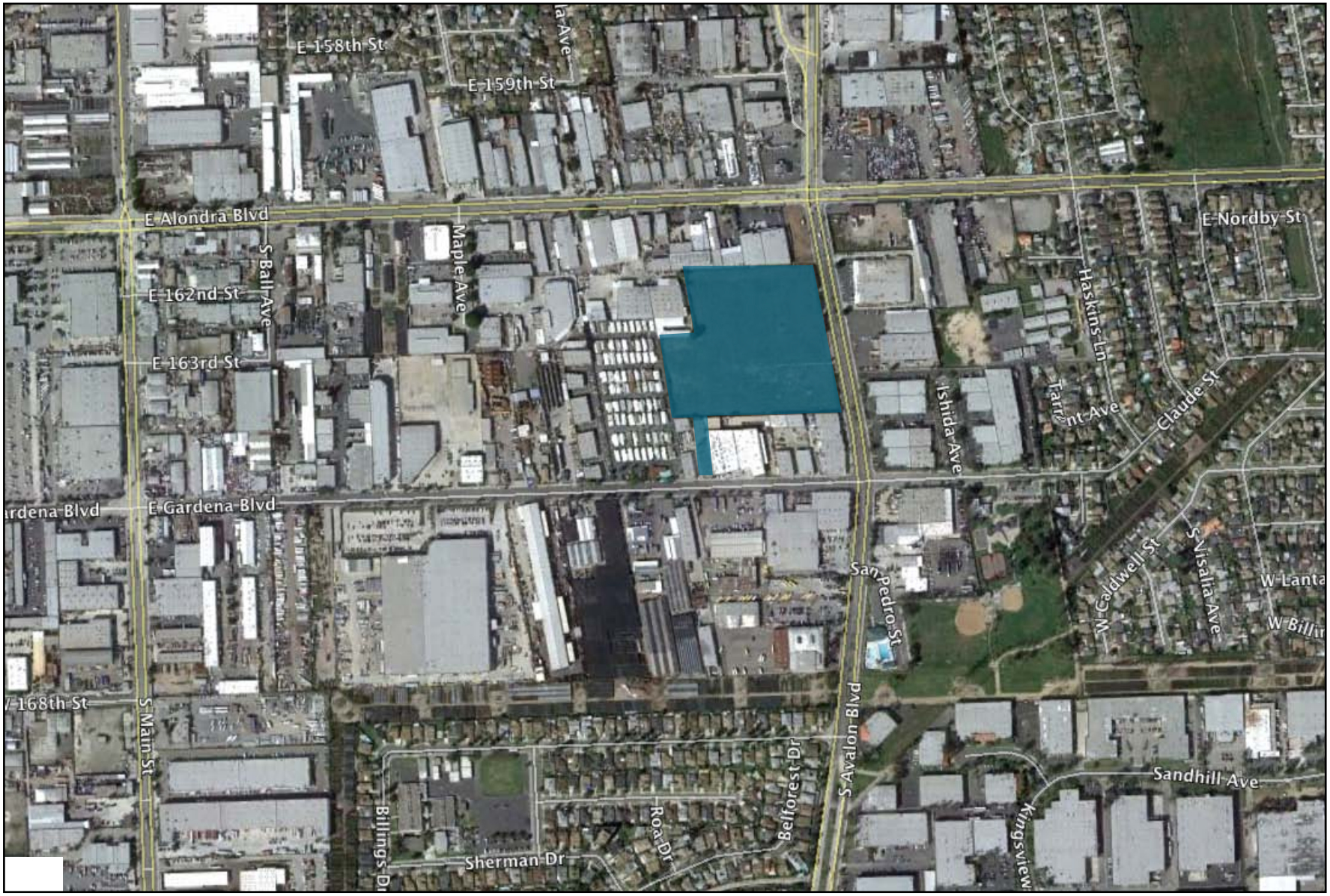
There is little to no landscaping or open space area in the immediate project vicinity apart from street trees. The nearest open space area to the project site is the City of Carson Hemingway Park, located approximately 0.125 miles southeast of the project site. The nearest school is Ralph Bunche School, located approximately 0.2 miles east of the project site. Both the park and the school are separated from the project site by Avalon Boulevard and by industrial development along Avalon Boulevard.

A single family residential area is located further to the south of the project site, south of 169th Street. This area is separated from the project site by industrial development on Gardena Boulevard. Another



Project Site

Source: Google Earth, December, 2011.



Project Site

Source: Google Earth, December, 2011.

EcoTierra consulting

Figure III-2
Aerial Photo

View 1: View of Project Site from Avalon Boulevard.

View 2: View of Project Site from Avalon Boulevard.

View 3: Vacant Industrial Building on Flag Lot.

PHOTO LOCATION MAP

Source: EcoTierra Consulting, November 2011.

View 4: Industrial Building on Avalon Boulevard.

View 5: Industrial Building on Avalon Boulevard.

View 6: Mobile Home Park from Gardena Boulevard.

PHOTO LOCATION MAP

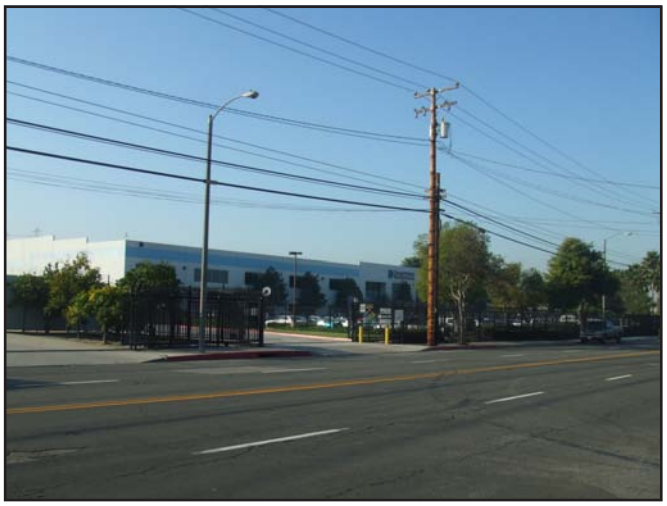
Source: EcoTierra Consulting, November 2011.

EcoTierra consulting

Figure III-4
Project Site Photos
Views 4, 5, and 6

View 7: Industrial Building on Gardena Boulevard, Adjacent to Mobile Home Park.

View 8: Industrial Buildings on Gardena Boulevard.



View 9: Industrial Buildings on Gardena Boulevard.

PHOTO LOCATION MAP

Source: EcoTierra Consulting, November 2011.

single family residential area is located to the east of the project site, north and south of Alondra Boulevard. This area is separated from the project site by industrial development on Avalon Boulevard. An additional single family area is located north and northwest of the project site, north of Alondra Boulevard. This area is separated from the project site by industrial development along Alondra Boulevard.

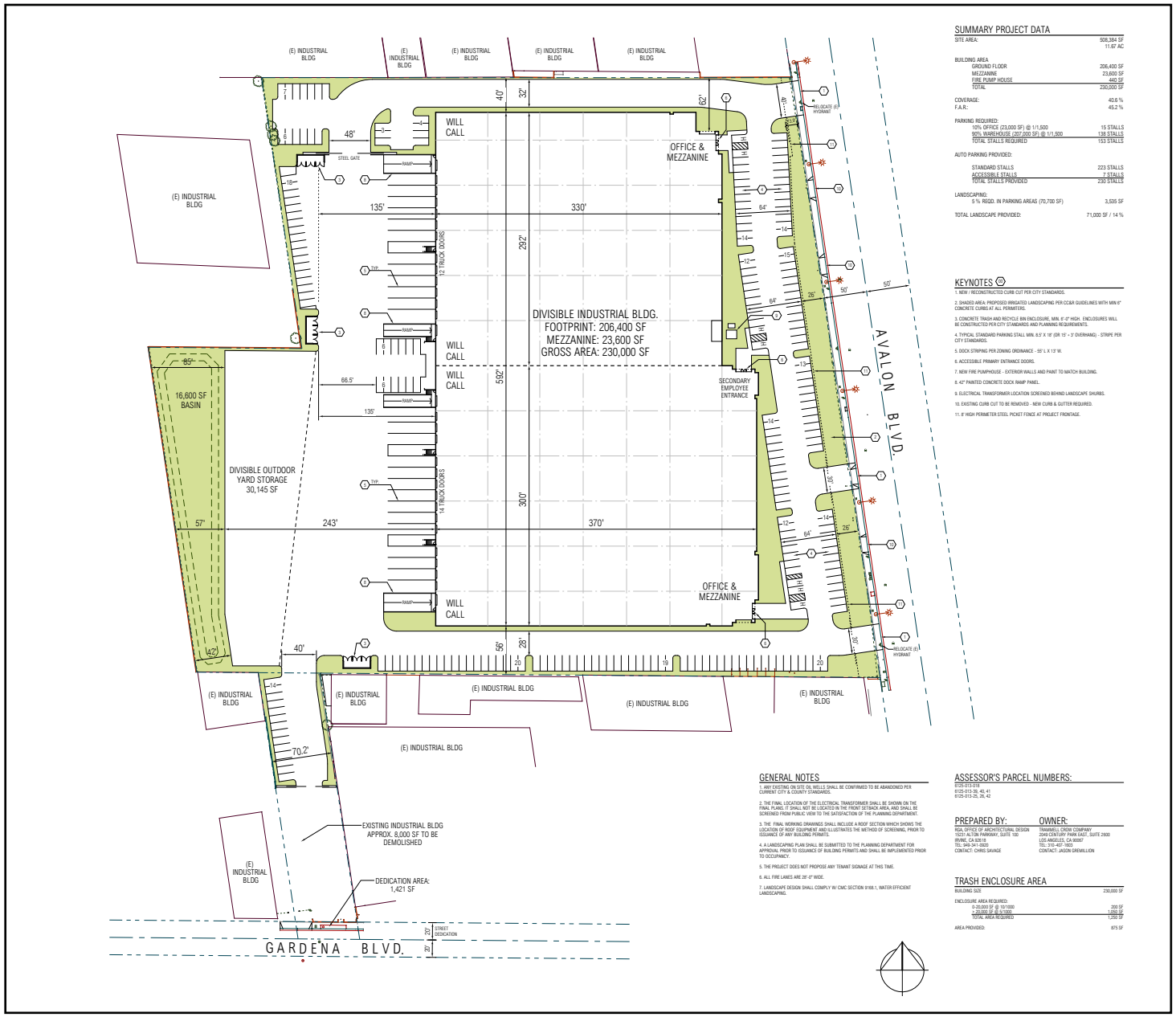
C. Existing Site Zoning / Land Use

As shown in Figure III-2 [Aerial View of the Project Site], the project site is mostly vacant, with the exception of an 8,000 square foot vacant industrial building located on a "flag lot" that connects the main area of the project site with Gardena Boulevard to the south. The project site was utilized as a nursery prior to 2002. The project site is designated for Light Industrial Use in the Carson General Plan. The project site is zoned ML-D (Manufacturing, Light, with Design Overlay). The ML zone permits a variety of light industrial and warehousing uses, with a minimum lot size of 20,000 square feet and no height limit. The D Design Overlay designation requires that new development be subject to Carson Municipal Code (CMC) Section 9172.23, Site Plan and Design Review. This type of permit is commonly referred to as a Design Overlay Review (DOR). A DOR requires that a development plan be submitted and approved according to procedures contained in CMC Section 9172.23 before any grading permit, electrical permit, plumbing permit, or building permit is issued or sign installed which involves significant exterior changes in the opinion of the Planning Director. A development valuation exceeding $50,000 requires the development plan to be reviewed by the Planning Commission at a public hearing.

2. PROJECT CHARACTERISTICS

The proposed project involves the demolition of the existing 8,000 square foot vacant industrial building on the flag lot, and construction of a new light industrial/warehouse building containing up to 230,000 square feet, and associated access and parking improvements (see Figure III-6 [Site Plan]). The building would be potentially divisible between two tenants with a total of 206,400 square feet of ground floor space available. The building would be able to accommodate up to 26 truck docks on the west side of the building. Two truck service/maintenance and parking areas are provided at the southwestern corner of the site. A total of 230 automobile parking stalls would be provided throughout the site. The automobile parking supply proposed by the project would exceed the code requirement of the City of Carson.

Access to the project site would be provided via three driveways on Avalon Boulevard and an additional driveway on Gardena Boulevard that would provide access to the site via the flag lot. An existing raised median island on Avalon Boulevard adjacent to the project's frontage would limit both the northern and southern driveways along this street to right-turn entry and exit movements only. The "middle" Avalon Boulevard driveway would permit both left-turn and right-turn entry and exit. However, this driveway would not provide adequate driveway width or drive aisle maneuvering space to accommodate semi-trailer truck traffic. Therefore, this driveway would be limited to automobile access only. As such, the Avalon Boulevard driveways would only be able accommodate truck traffic entering or exiting the site southbound on Avalon Boulevard. Additionally, to maximize the efficiency of the on-site vehicular operations, truck circulation within the site will be restricted to westbound-only (i.e., entering trucks) in the north drive aisle, and eastbound-only (i.e., exiting trucks) in the southern drive aisle (see Figures III-7 [Truck Entry and Dock Access Operations] and III-8 [Truck Exit Operations])).

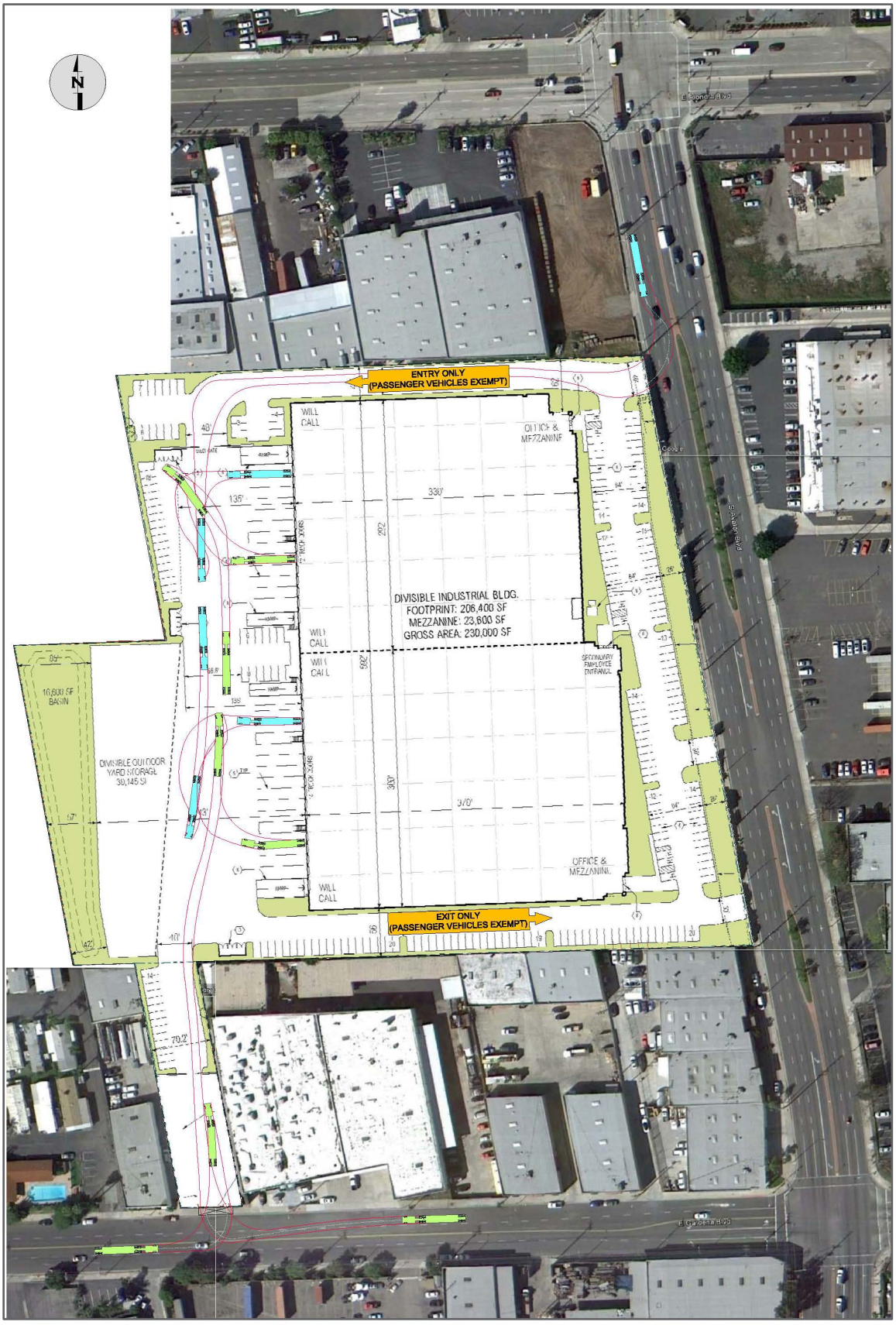


Project Site

Source: RGA , October 20, 2011.

EcoTierra consulting

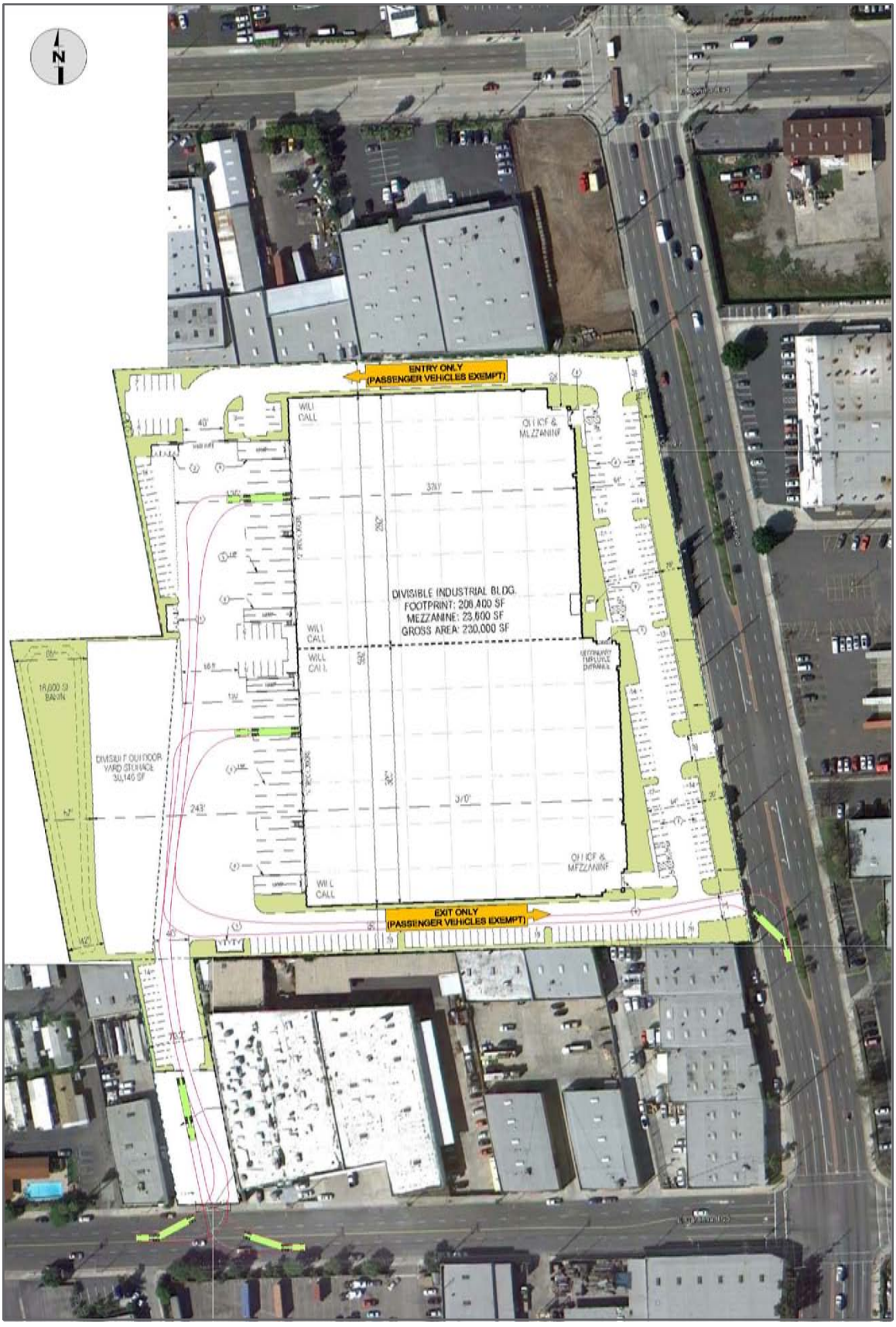
Figure III-6
Site Plan



Source: Hirsch Green Transportation Consulting, Inc., November 7, 2011.

EcoTierra consulting

Figure III-7
Truck Entry and Dock Access Operations



Source: Hirsch Green Transportation Consulting, Inc., November 7, 2011.

EcoTierra consulting

Figure III-8
Truck Exit Operations

The Gardena Boulevard driveway and flag lot access road would permit both left-turn and right-turn entry and exit along the west side of the project site and access to and from the truck docks. Any truck accessing the project site from northbound Avalon Boulevard would be required to turn left on Gardena Boulevard and use this driveway and access road to access the project site. The proposed project would also include construction of an eight-foot high, concrete block wall along the western edge of the site to provide a buffer between the project and the adjacent use to the west.

The proposed project will include landscaped areas along the eastern edge of the project site adjacent to Avalon Boulevard. In addition, an approximately 16,000 square foot landscaped swale for stormwater retention and treatment will be provided along the western boundary of the project site adjacent to the mobile home park.

A. Project Construction

Construction of the proposed project is anticipated to begin in April 2012 and would take place over a period of approximately 10 months; including approximately one month for demolition and excavation, one month for pad construction and approximately eight months for building construction and tenant improvements. Project completion and occupancy is expected to occur in 2013.

B. Project Land Use / Zoning

As previously noted, the project site is vacant with the exception of a vacant 8,000 square foot structure on the flag lot. These existing uses are permitted uses by-right in the ML zone. The proposed light industrial/warehouse use would also be permitted by-right in the ML zone. The project would require Design Overlay Review in accordance with CMC Section 9172.23.

3. PROJECT OBJECTIVES

The objectives of the proposed project are as follows:

- To establish infill development providing light industrial and related uses to provide employment opportunities in a manner consistent with the City of Carson General Plan;
- To provide a well-designed development that is compatible and complementary with surrounding land uses;
- To provide an efficient circulation system that serves the project without impacting the surrounding roadways;
- To provide adequate parking facilities to serve the proposed development employees and visitors; and
- To mitigate, to the extent feasible, the potential environmental impacts of the proposed project.

4. ACTIONS REQUIRED

The City of Carson Economic Development Services Department, Planning Division is the lead agency for the proposed project. In order to permit development of the proposed project, the City may require approval of one or more of the following discretionary actions:

- Design Overlay Review; and
- Adoption/certification of the appropriate environmental clearance for the project.

In addition, pursuant to various sections of CMC, the proposed project may require ministerial approvals and permits from municipal agencies for project construction activities including, but not limited to the following: permits for driveway curb cuts, storm water discharge permits, grading permits, installation and hookup approvals for public utilities, haul route approvals, and related permits.

5. RELATED PROJECTS

Section 15063(b) of the State CEQA Guidelines provides that Initial Studies consider the environmental effects of a Proposed Project individually as well as cumulatively. Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (State CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts.

All projects recently approved, under construction, or to be developed in the reasonably foreseeable future (i.e., those projects with pending applications) that could potentially produce a related cumulative environmental impact, when considered in combination with the proposed project are evaluated throughout Section IV, Environmental Impact Analysis. A review of proposed or ongoing development projects located within the study area, defined as an approximately 1-mile radius from the project site, was conducted to determine whether any other nearby projects would be completed within the study timeframe. However, based on information provided by the City's traffic engineer, there are no such "related project" developments located within the study area that would be expected to be completed by 2013. As such, the traffic study assumed a 1.0 percent annual ambient traffic growth factor, which would fully reflect all anticipated area traffic growth within the study period, including traffic due to any as-yet unidentified projects.

IV. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in the Initial Study Checklist and compares the conclusions regarding project impacts to the conclusions of the City of Carson General Plan EIR (General Plan EIR). The thresholds of significance are based on the CEQA Guidelines Appendix G Environmental Checklist Form. The analysis demonstrates that, compared to the General Plan EIR analysis, the proposed project would not result in new significant impacts or substantial increase in the severity of previously identified impacts.

IMPACT ANALYSIS

1. AESTHETICS

The General Plan EIR evaluated the following potential impacts with respect to aesthetics:

- **Visual Quality** – Development associated with implementation of the proposed General Plan may degrade the visual quality of the surrounding environment within the City.
- **Light and Glare** – Light and glare from new development associated with implementation of the proposed General Plan may adversely affect sensitive receptors such as residential uses.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Visual Quality** – Less Than Significant Impact.
- **Light and Glare** – Less Than Significant Impact.

Existing Conditions

The following is a summary of existing conditions with respect to aesthetics within the project vicinity.

Visual Character

The project site is located in an urbanized setting and is surrounded by predominantly industrial uses located along Avalon Boulevard, Gardena Boulevard and Alondra Boulevard. Commercial uses are located to the north of the project site at the intersection of Alondra and Avalon Boulevards. A mobile home park is located to the west of the western boundary of the project site. Buildings in the vicinity of

the project site are one to two stories in height. Various photographs of the project site and its immediate surroundings are shown in Figures III-3 through III-5.

The area where the project site is located is designated for Light Industrial land uses. The project site is zoned ML-D (Manufacturing, Light, with Design Overlay). The ML zone permits a variety of light industrial and warehousing uses, with a minimum lot size of 20,000 square feet and no height limit. The D Design Overlay designation requires that new development be subject to Carson Municipal Code (CMC) Section 9172.23, Site Plan and Design Review. The project site is presently undeveloped, except for a vacant, approximately 8,000 square foot industrial building.

Views of and through the Project Site

The project site is not located within or along a designated scenic corridor. Due to the location of the project site and the surrounding development, there are no expansive views through the project site to scenic or visual resources in any direction.

Architectural and Urban Design

Buildings in the vicinity are generally of a utilitarian style and are constructed of brick, tilt-up concrete or metal. Building heights in the area are generally one to two stories. Larger buildings are set back from the street and include surface parking lots and truck operating areas.

Lighting

The project site is located in a well-lit, urban area where there is ambient nighttime lighting including street lighting, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows), and vehicle headlights.

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

Less Than Significant Impact. A significant impact may occur if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). There are no state or county designated scenic

highways in the vicinity of the project site.[1] There would be no impacts to scenic highways as a result of the buildout of the proposed project.

There are no significant natural features (such as trees, rock outcroppings, bodies of water, or substantial stands of native vegetation) found on the project site. In addition, there are no major open spaces found on the project site and there are no aesthetically significant man-made features (such as major architectural structures, monuments, or gardens) on the project site. The proposed project includes landscaping, which would include various shrubs, ground cover plants, and trees. Impacts to on-site scenic resources would be less than significant.

The project site does not contain any unique scenic vistas, as it is entirely comprised of urban development. No visual resources are located in the vicinity of the project site with the potential to be considered scenic resources. No impacts to off-site scenic resources would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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. A significant impact would occur only if scenic resources would be damaged and/or removed by development of a project.

There are no scenic resources, such as native California trees or rock outcroppings on the project site. There are no state or county designated scenic highways in the vicinity of the project site. Therefore, the proposed project would not damage and/or remove any scenic resources within a State or City designated scenic highway, and no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. A significant impact would occur if a project were to introduce incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site.

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[1] *California Scenic Highway Mapping System, State of California Department of Transportation, http://www.dot.ca.gov/hq/LandArch/scenic/schwy.htm, November, 2011.*

The project would not introduce incompatible visual elements to the project site or in the surrounding area. The proposed light industrial/warehouse building would be consistent with the general character of the surrounding area and the existing uses in the immediate vicinity of the project site. The project would be up to 42.5 feet in height.

Heights and Massing

The project proposes the construction of a two-level, up to 42.5-foot tall light industrial/warehouse building. With respect to building height and massing, land uses in the immediate vicinity of the project site are typically one to two-story industrial buildings. The building heights and massing that would be developed with the implementation of the proposed project would create a change from the current undeveloped appearance of the project site. However, the proposed project would be similar in height and massing compared to the existing industrial character of the area. Therefore, impacts related to the height and massing of the proposed project would be less than significant.

Architectural Style and Urban Design

The buildings surrounding the project site are generally industrial uses of utilitarian design. The proposed project design would be consistent with the existing character of the area. The proposed project would include landscaping to would improve the appearance of the site from its existing undeveloped state. Therefore, impacts related to the architectural style and urban design of the proposed project would be less than significant.

As a result of the building's architectural design and orientation on the project site, the proposed project would be effectively integrated into the aesthetics of the project site and project area by means of design, architecture, size, massing, and location. Furthermore, the proposed project's location, height, scale, and architectural features are generally compatible with existing and planned development for this area of the City as set forth in the General Plan. The potential aesthetic impacts of the proposed project to the general visual character of the project area would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Shade/Shadow

The issue of shade and shadow pertains to the effect of shadows cast upon adjacent areas by proposed structures. The effects of shading are site specific. Shadow effects are dependent upon several factors, including the local topography, the height and bulk of the project's structural elements, sensitivity of adjacent land uses, season, and duration of shadow projection. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or

institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce.

Shadows from the proposed project building would be cast to the northwest, north and northeast of the project site as the sun moves from east to west. The only shadow-sensitive receptor in the vicinity of the project site is the mobile home park to the west. Shadows cast by the proposed project building would be expected to largely remain within the boundary of the project site. Some early morning shadows, particularly in the winter months, could fall on the mobile home park. However, the duration of these shadows would be limited and would not place units within the mobile home park in shadow for extensive periods of time. Shadow impacts of the proposed project would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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 with Mitigation. A significant impact may occur if a project introduces new sources of light or glare on or from the project site which would be incompatible with the areas surrounding the project site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways.

Light

The project site is located in a well-lit urban area where there are high levels of ambient nighttime lighting including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows) and automobile headlights. The only light sensitive use in the vicinity of the project site is the mobile home park located adjacent to the project site to the west. Artificial light impacts are largely a function of proximity. The project site is located within an urban environment, so that light emanating from any one source contributes to rather than is solely responsible for lighting impacts on a particular use. Since development surrounding the project site is already impacted by lighting from existing development within the area, new light sources must occupy a highly visible amount of the field of view of light-sensitive uses to have any notable effect.

The proposed project would have the potential to alter lighting patterns in the area of the project site as compared with the existing undeveloped state of the project site. Lighting would be wall mounted or ground mounted and would be directed downward and shielded away from the adjacent mobile home park. Wall mounted security lighting would remain lit all night at each entrance and/or exit, but would

be designated to prevent glare into the adjacent mobile home park. Furthermore, the majority of lighting associated with the proposed project would be directed internal to the project site itself, away from neighboring land uses. In addition, an 8-foot concrete block wall would be provided at the western boundary of the project site to provide buffering from light sources on the project site. Therefore, interior and exterior lights on the project site would not shine directly onto light-sensitive uses, and would not result in light trespass. In addition, while the majority of the lighting would be directed towards the interior of the project site and would be directed away from neighboring land uses, the implementation of Mitigation Measure 1-1 would ensure that any new light sources would not create significant lighting impacts on the adjacent mobile home park. Therefore, impacts associated with illumination would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Glare

Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the project site and exterior building windows. Excessive glare not only restricts visibility, but increases the ambient heat reflectivity in a given area.

There are no existing sources of glare within the project site. The exterior portions of the proposed building would utilize various non-reflective materials designed to minimize the transmission of glare from buildings. The proposed light industrial/warehouse building would not include large expanses of windows. As such, impacts associated with glare would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Mitigation Measure

1-1 Outdoor lighting shall be designed and installed with downcast shielding, so that the light sources are shielded from adjacent properties and light does not fall directly on adjacent properties.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed project in conjunction with any future projects in the area would result in an intensification of existing prevailing land uses in an already urbanized area of the City of Carson. Future development is expected to occur in accordance with

adopted plans and regulations. While future development could be visible from public and private properties, such development and the proposed project would not combine to obstruct scenic views because such views do not exist in this area of the City. With respect to the overall visual quality of the surrounding neighborhood, future development projects would be required to provide landscaping in accordance with the City's standards. Any approvals granted to future development projects would be expected to result in landscapes that would be aesthetically compatible with the surrounding area. Therefore, cumulative aesthetic impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

2. AGRICULTURE AND FORESTRY RESOURCES

There is no agricultural land in the City of Carson. The General Plan EIR did not address potential impacts related to agriculture and forestry resources.

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

No Impact. A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use.

The project site is undeveloped, except for a vacant 8,000 square foot industrial building located on the flag lot, and is located in an urbanized area of the City of Carson characterized by industrial land uses. Although the project site was previously used as a commercial nursery, no farmland or agricultural activity presently exists on or in the vicinity of the project site. The South Bay area of Los Angeles County is not included in the area of the County mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. [2] Therefore, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

[2] *Source: State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf.*

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use.

The project site is located within the jurisdiction of the City of Carson and is, therefore, subject to the applicable land use and zoning requirements in the Carson Municipal Code (CMC). The CMC includes development standards for the various zoning classifications in the City of Carson. The project site is currently zoned ML-D and has a land use designation of Light Industrial in the Carson General Plan. The project site is not zoned for agricultural production, and there presently is no farmland or agricultural activity at the project site. In addition, no Williamson Act Contracts are in effect for the project site.[3] Therefore, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(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. A significant impact may occur if a project were to result in the conversion of land zoned 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)).

The project site is located within the jurisdiction of the City of Carson and is, therefore, subject to the applicable land use and zoning requirements in the Carson Municipal Code (CMC). The CMC includes development standards for the various zoning classifications in the City of Carson. The project site is currently zoned ML-D and has a land use designation of Light Industrial in the Carson General Plan. The project site is not zoned as forest land or timberland, and there is no Timberland Production at the project site. Therefore, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

[3] *Williamson Act Program, California Division of Land Resource Protection, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006_wallsize.pdf.*

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

No Impact. A significant impact may occur if a project were to result in the loss of forest land or conversion of forest land to non-forest use.

The project site is undeveloped, except for a vacant 8,000 square foot industrial building located on the flag lot, and is located in an urbanized area of the City of Carson characterized by industrial land uses. No forest land exists on or in the vicinity of the project site. Therefore, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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. A significant impact may occur if a project results in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

The project site is undeveloped, except for a vacant 8,000 square foot industrial building located on the flag lot, and is located in an urbanized area of the City of Carson characterized by industrial land uses. Neither the project site, nor nearby properties, are currently utilized for agricultural or forestry uses and, as discussed above (Section 2(a)), the project site is not classified in any "Farmland" category designated by the State of California. The project site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). Therefore, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

No Impact. Development of the proposed project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use nor result in the loss of forest land or conversion of forest land to non-forest use. The South Bay area of Los Angeles County is not included in the Extent of Important Farmland Map Coverage maintained by the Division of Land Protection, indicating that the project site and the surrounding area

are not included in the Important Farmland category.[4] The project site and the related projects are located in an urbanized area in the City of Carson and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

3. AIR QUALITY

The General Plan EIR evaluated the following potential impacts with respect to air quality:

- **Construction Emissions** - Citywide construction activity under the proposed General Plan may result in a cumulatively considerable increase of criteria pollutants and thus may violate air quality standards.
- **Vehicle Miles Travelled and Stationary Source Emissions** - Development associated with the implementation of the proposed General Plan would result in an overall increased in mobile and stationary source emissions within the City, which may exceed SCAQMD air quality standards.
- **Consistency with Regional Plans** – Implementation of the proposed General Plan may conflict or obstruct implementation of the Southern California Association of Government's Regional Comprehensive Plan and the South Coast Air Quality Management District's Regional Air Quality Management Plan.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Construction Emissions** – Significant and Unavoidable Impact.
- **Vehicle Miles Travelled and Stationary Source Emissions** - Significant and Unavoidable Impact.
- **Consistency with Regional Plans** – Less Than Significant Impact.

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

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP), or would in some way represent a substantial hindrance to employing the policies, or obtaining the goals, of that plan. In the case of projects proposed within the South Coast Air Basin (Basin), the applicable plan is the AQMP that has been

[4] *Source: State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf.*

prepared by the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control within the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments and cooperates actively with all State and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to comply with the federal and State Clean Air Acts. As required by the federal and State Clean Air Acts, ambient air quality standards were established for "criteria" pollutants. Areas within California are designated as being in attainment or nonattainment for each pollutant based on whether the area achieves the applicable ambient air quality standards. Under national standards, the Basin is currently classified as an extreme nonattainment area for 8-hour ozone concentrations, a serious nonattainment area for PM_{10}, and a nonattainment area for $PM_{2.5}$. The Basin is in attainment or designated as unclassified for all other criteria pollutants under national standards. Under State standards, the Basin is designated as a nonattainment area for ozone, nitrogen dioxide (NO_2), respirable particulate matter 10 microns or less in diameter (PM_{10}), and fine particulate matter 2.5 microns or less in diameter ($PM_{2.5}$) and an attainment area for all other criteria pollutants.

Nonattainment areas are required to prepare AQMPs to include specified strategies to reduce emissions in an effort to meet clean air goals. The SCAQMD has responded to this requirement by preparing a series of AQMPs and amending them where applicable. The most recent document was adopted by the Governing Board of the SCAQMD on June 1, 2007. This AQMP, referred to as the 2007 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. It builds on approaches taken from the 2003 AQMP for the attainment of the federal ozone air quality standard. These planning efforts have substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

The future air quality levels projected in the 2007 AQMP are based on several assumptions, including regional population growth projections and implementation of SCAQMD's rules and regulations. The regional population growth projections are based on land use designations of the communities throughout the Basin as well as growth forecasts identified by SCAG in the Regional Comprehensive Plan. As such, consistency of general development projects with the AQMP is determined by demonstrating consistency with adopted local land use plan designations and/or population projections

as developed by SCAG. This analysis uses consistency with the local land use plan designations as the basis for the proposed project's AQMP consistency determination.

The project site is designated for Light Industrial Use in the Carson General Plan and is zoned ML-D (Manufacturing, Light, with Design Overlay). The ML zone permits a variety of light industrial and warehousing uses, with a minimum lot size of 20,000 square feet and no height limit. The proposed project would be consistent with the land use and zoning designations for the project site. As such, the growth associated with the proposed project has been accommodated in the AQMP and the proposed project would be consistent with the 2007 AQMP. This would be a less than significant impact. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. The proposed project is located within the SCAQMD jurisdiction. To address potential impacts from construction and operational activities, SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in Table IV-1 (SCAQMD's Significant Emissions Thresholds) be considered significant. The City of Carson defers to these thresholds for the evaluation of construction-related and operational air quality impacts.

Table IV-1
SCAQMD's Significant Emissions Thresholds

Pollutant	Construction Thresholds (lbs/day)	Operational Thresholds (lbs/day)
Volatile Organic Compounds (VOC)	75	55
Nitrogen Oxides (NO_x)	100	55
Carmon Monoxide (CO)	550	550
Sulfur Oxides (SO_x)	150	150
Respirable Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55

Note: lbs = pounds.
Source: South Coast Air Quality Management District, Air Quality Significance Thresholds, website: http://aqmd.gov/cega/handbook/signthres.pdf, accessed on December 8, 2011.

Mass Daily Construction Emissions

Construction of the proposed project is expected to begin in April 2012 and take place over a period of approximately 10 months. The construction-related activities would include the demolition of the existing 8,000-square-foot building on the flag lot, site preparation and grading of the project site, and construction of the proposed light industrial/warehouse building and surface parking lot. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod v. 2011.1.1), as recommended by the SCAQMD. Due to the construction timeframe and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed construction activities; therefore the analysis analyzes a "worst-case scenario" by analyzing maximum daily emissions during the project construction phases.

Table IV-2 (Estimated Mass Daily Construction Emissions) identifies mass daily emissions that are estimated to occur on peak construction days. These estimates assume compliance with all applicable SCAQMD rules and regulations for the control of fugitive dust and architectural coating emissions. As shown in Table IV-2, mass daily construction emissions are not anticipated to exceed the SCAQMD significance thresholds for construction. Therefore, the mass daily construction-related impacts associated with the proposed project would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Table IV-2
Estimated Mass Daily Construction Emissions

Year with Construction Activity	Peak Day Emissions in Pounds per Day					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
2012	52.13	92.10	53.35	0.08	14.19	8.42
2013	51.43	54.81	45.14	0.08	6.31	4.05
SCAQMD Thresholds	75.0	100.0	550.0	150.0	150.0	55.0
Significant Impact?	No	No	No	No	No	No

Source: CalEEMod v. 2011.1.1. Cadence Environmental Consultants, 2011. Calculation sheets are provided in Appendix A.

Mass Daily Operational Emissions

Operational emissions generated by mobile, energy, and area sources typically result from normal day-to-day activities at the project site after occupation. Area source emissions are generated by the consumption of natural gas, the operation of landscape maintenance equipment, and building maintenance (architectural coatings). The analysis of daily operational emissions has been prepared

utilizing the CalEEMod computer model, as recommended by the SCAQMD. The results of these calculations are presented in Table IV-3 (Estimated Mass Daily Operational Emissions). As shown, the total operational emissions generated by the proposed project would not exceed the operational thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the proposed project would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Table IV-3
Estimated Mass Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog season) Emissions						
Area Sources	5.14	0.00	0.00	0.00	0.00	0.00
Energy Consumption	0.01	0.05	0.04	0.00	0.00	0.00
Mobile Sources	5.38	12.95	52.45	0.09	9.98	0.90
Total Emissions	***10.53***	***13.00***	***52.49***	***0.09***	***9.98***	***0.90***
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime Emissions						
Area Sources	5.14	0.00	0.00	0.00	0.00	0.00
Energy Consumption	0.01	0.05	0.04	0.00	0.00	0.00
Mobile Sources	5.62	14.00	52.07	0.08	9.99	0.91
Total Emissions	***10.77***	***14.05***	***52.11***	***0.08***	***9.99***	***0.91***
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod v. 2011.1.1. Cadence Environmental Consultants, 2011. Calculation sheets are provided in Appendix A.

c) 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 (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

Less Than Significant Impact. A significant impact may occur if a project would add a considerable cumulative contribution to federal or State non-attainment pollutant.

Because the Basin is currently in nonattainment for ozone, NO_2, PM_{10} and $PM_{2.5}$, related projects may likely exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the proposed project contribution, SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple

development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed under Section 3(b), above, the proposed project would not exceed any of the SCAQMD's recommended mass daily thresholds of significance for construction or operation. Also, as discussed in Section 3(d), below, localized emissions generated by the proposed project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the proposed project would not cause a cumulatively considerable increase in emissions for the pollutants for which the Basin is in nonattainment. Impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

The nearest sensitive receptor to the project site is the mobile home park located adjacent to the western boundary of the project site. The nearest school is Ralph Bunche School, located approximately 0.2 mile east of the project site. The school is separated from the project site by Avalon Boulevard and by existing industrial development along Avalon Boulevard. No hospitals or convalescent homes are located in close proximity to the project site.

The proposed project may involve the storage of toxic materials, but would not involve operations that generate toxic air pollutants. Demolition of the existing building at the site could involve exposures to asbestos containing materials and lead based paint. Impacts associated with these materials are discussed in Section 8 of this Initial Study.

Localized Construction Emissions

The daily construction emissions generated by the proposed project have been analyzed against SCAQMD's LSTs to determine whether the emissions from the project site would cause or contribute to adverse localized air quality impacts (i.e., adverse air quality impacts on nearby sensitive receptors). The SCAQMD's LSTs are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$.

The thresholds found in SCAQMD's mass rate LST look-up tables are based on the size of the project site, which range from one to five acres. The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). The project site is located in SRA 4 – South Coastal LA County . The smaller sites have lower thresholds since the pollutants would be generated within a more confined area. For example, the localized NOx threshold for a one-acre site in SRA 4 with a sensitive use within 25 feet of the site boundary is 57 pounds per day, while the corresponding threshold for a five-acre site is 123 pounds per day. This analysis uses the LSTs for a five-acre site as a conservative screening tool and the existing sensitive receptors are assumed to be located within 25 meters of the project site.[5] If the emissions generated at the 11.67-acre site were to exceed the thresholds for a five-acre site, then a more detailed analysis would need to be conducted to determine whether the project would expose nearby sensitive uses to substantial pollutant concentrations.

Table IV-4 (Estimated Daily Localized Construction Emissions) identifies the maximum daily emissions that are estimated to occur at the project site during construction phases of the proposed project. As shown in Table IV-4 (Localized Estimated Daily Construction Emissions), emissions during the construction phases would not exceed the SCAQMD's LST for the specified pollutants. Impacts related to localized pollutant concentrations during construction would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

[5] *The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters.*

Table IV-4
Estimated Daily Localized Construction Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition				
On-site Emissions	34.51	18.68	1.79	1.62
SCAQMD Localized Thresholds	123.0	1.530.0	14.0	8.0
Significant Impact?	No	No	No	No
Site Grading				
On-site Emissions	52.60	25.69	5.06	3.66
SCAQMD Localized Thresholds	123.0	1.530.0	14.0	8.0
Significant Impact?	No	No	No	No
Building Construction, Architectural Coatings, and Paving				
On-site Emissions	47.50	30.77	3.64	3.64
SCAQMD Localized Thresholds	123.0	1.530.0	14.0	8.0
Significant Impact?	No	No	No	No

Note: Localized thresholds for construction emissions at a five-acre site with receptor distance of 25 meters, as established by the SCAQMD for sites in Source Receptor Area (SRA 4), which is where the project site is located.
Source: CalEEMod v. 2011.1.1. Cadence Environmental Consultants, 2011. Calculation sheets are provided in Appendix A.

Localized Operational Emissions

Table IV-5 (Estimated Daily Localized Operational Emissions) identifies the daily emissions that are estimated to occur during the day-to-day operation of the proposed project at the project site. As shown in Table IV-5 on-site emissions generated by the proposed project during operation would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM_{10} and $PM_{2.5}$ at a receptor distance of 25 meters. Therefore, this impact would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Table IV-5
Estimated Daily Localized Operational Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Operational Summer				
On-site Emissions	2.63	10.08	0.27	0.05
SCAQMD Localized Thresholds	123.0	1.530.0	4.0	2.0
Significant Impact?	No	No	No	No
Operational Winter				
On-site Emissions	2.61	13.13	0.28	0.05
SCAQMD Localized Thresholds	123.0	1.530.0	4.0	2.0
Significant Impact?	No	No	No	No

Note: Localized thresholds for construction emissions at a five-acre site with receptor distance of 25 meters, as established by the SCAQMD for sites in Source Receptor Area (SRA 4), which is where the project site is located.
Source: CalEEMod v. 2011.1.1. Cadence Environmental Consultants, 2011. Calculation sheets are provided in Appendix A.

In addition to the emissions generated at the project site, localized emissions would also be generated by vehicles traveling through nearby intersections. Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed CO "hotspots." The SCAQMD considers CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots.

As discussed in Section 16, Transportation/Traffic, of this Initial Study, all of the local study area intersections are projected to operate at acceptable levels of service with the addition of the traffic generated by the proposed project. Therefore, the proposed project would not cause substantial traffic congestion that could create a localized CO hotspot. This would be a less than significant impact. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. A project-related significant adverse effect could occur if construction or operation of the proposed project would result in generation of odors that would be perceptible in adjacent sensitive areas.

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The proposed project consists of the development of a light industrial/warehouse building. It would not involve heavy industrial processes that could result in odor

generation. This type of use is not typically associated with odor complaints. As the proposed project involves no elements related to industrial processes, no objectionable odors are anticipated. Therefore, impacts associated with objectionable odors would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less than Significant Impact. See the response to Section 3(b), above.

4. BIOLOGICAL RESOURCES

The General Plan EIR did not address potential impacts related to biological resources.

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

No Impact. A project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The project site is presently undeveloped with the exception of a vacant approximately 8,000 square foot industrial building and is located in a heavily urbanized area of the City of Carson. The project site does not contain any habitat capable of sustaining 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. In addition, there are no known locally designated natural communities at the project site or in the project vicinity. Therefore, the proposed project would have no impact on sensitive biological species or habitat. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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?

No Impact. A project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- The alternation of an existing wetland habitat; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The project site is presently undeveloped with the exception of a vacant approximately 8,000 square foot industrial building and is located in a heavily urbanized area of the City of Carson. No riparian or other sensitive habitat areas are located on or adjacent to the project site. Implementation of the proposed project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat.

The project site is presently undeveloped with the exception of a vacant approximately 8,000 square foot industrial building and is located in a heavily urbanized area of the City of Carson. The project site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act and no impacts to riparian or wetland habitats would occur with implementation of the proposed project. Implementation of the proposed project would not result in any adverse impacts to federally protected wetlands. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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?

No Impact. A project would normally have a significant impact on biological resources if it could result in interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species.

As discussed in Section 4(a), the project site is located in a developed area of the City of Carson. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the vicinity of the project site. Therefore, implementation of the proposed project would have no impact on the movement of any resident or migratory fish or wildlife species. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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

No Impact. A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources.

The City of Carson does not have local policies or ordinances that protect biological resources. As such, implementation of the proposed project would not conflict with any local policies or ordinances protecting or preserving biological resources, and no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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?

No Impact. A significant impact would occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited.

The project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the proposed project. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed project in combination with the related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat is expected to occur in the vicinity of the related projects and the proposed project due to the existing urban development. Therefore, cumulative impacts to biological resources would be considered less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

5. CULTURAL RESOURCES

The General Plan EIR evaluated the following potential impacts with respect to cultural resources:

- **Historical Structures or Resources** – Implementation of the proposed General Plan may result in the degradation or loss of historic structures or resource.
- **Archaeological Resources** - Implementation of the proposed General Plan may result in the adverse change of archaeological resources.
- **Paleontological Resources** – Implementation of the proposed General Plan may result in the destruction of a unique paleontological resource or site or unique geologic feature.
- **Disturbance of Human Remains** – Implementation of the proposed General Plan may result in the disturbance of human remains.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Historical Structures or Resources** – Less Than Significant Impact.
- **Archaeological Resources** – Less Than Significant Impact.
- **Paleontological Resources** – Less Than Significant Impact.
- **Disturbance of Human Remains** – Less Than Significant Impact.

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less Than Significant Impact. A significant impact may occur if a project would disturb historic resources which presently exist within the project site. Section 15064.5 of the State CEQA Guidelines defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical

resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A significant adverse effect would occur if a project were to adversely affect an historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

The project site is undeveloped with the exception of a vacant 8,000 square foot industrial building. This tilt-up concrete building is not a listed California historic resource, a significant building in the history of the City of Carson or a significant architectural example. Therefore, the proposed project would not affect an identified historic resource and impacts would be less than significant. The General Plan EIR includes a mitigation measure (MM-CR-1) to require, as part of the environmental review procedure, an evaluation of the significance of paleontological, archaeological and historical resources and the impact on proposed development on those resources. The evaluation provided in this Initial Study would fulfill this mitigation measure. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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. A significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources which presently exist within the project site.

The proposed project is located in an urbanized area of the City of Carson and has been subject to past disturbance, including soil disturbance associated with the previous nursery use. Any archaeological resources that may have existed near the site surface are likely to have been disturbed or previously removed. The proposed project would not result in deeper excavations than previously performed on the site. As such, deeper lying archeological artifacts, if any, that were not recovered during prior construction or other human activity, would not likely be disturbed. While the uncovering of notable resources is not anticipated, the following mitigation measure is included to ensure that any potential impact to a previously unknown archaeological resource is reduced to a less than significant level. Thus, it is anticipated that via compliance with existing regulations and the implementation of the identified mitigation measure, the proposed project impacts on any previously undiscovered archaeological resources would be less than significant. The General Plan EIR includes a mitigation measure (MM-CR-1) to require, as part of the environmental review procedure, an evaluation of the significance of paleontological, archaeological and historical resources and the impact on proposed development on

those resources. The evaluation provided in this Initial Study would fulfill this mitigation measure. The General Plan EIR includes an additional mitigation measure (MM-CR-3) that requires monitoring of grading operations by a qualified archaeologist when a site is reasonably suspected of containing archaeological resources. No evidence suggests that the project site is reasonably suspected of containing archaeological resources. However, Mitigation Measure 5-1 below fulfills the intent of the General Plan mitigation measure by requiring work stoppage and further investigation in the event that archaeological resources are discovered during construction activity. As such, the proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Mitigation Measures

5-1 If unknown archaeological materials are discovered during any grading or construction activity, work in the affected area shall stop and the contractor shall immediately notify the Applicant and the City of Carson. An archaeologist shall be consulted to determine the significance of the discovered artifact(s) and, if necessary, formulate a mitigation plan. Work can resume in the affected area only with the approval of the archaeologist.

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

Less Than Significant Impact With Mitigation. A significant impact could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the project site. No unique geologic features are located on the project site, which is undeveloped except for a vacant 8,000 square foot industrial building. The proposed project is located in an urbanized area of the City of Carson and has been subject to past disturbance, including soil disturbance associated with the previous nursery use. Any paleontological resources that may have existed near the site surface are likely to have been disturbed or previously removed. The proposed project would not result in deeper excavations than previously performed on the site. As such, deeper lying paleontological specimens, if any, that were not recovered during prior construction or other human activity, would not likely be disturbed. While the uncovering of notable resources is not anticipated, the following mitigation measure is included to ensure that any potential impact to a previously unknown paleontological resource is reduced to a less than significant level. Thus, it is anticipated that via compliance with existing regulations and the implementation of the identified mitigation measure, the proposed project impacts on any previously undiscovered archaeological resources would be less than significant. The General Plan EIR includes a mitigation measure (MM-CR-1) to require, as part of the environmental review procedure, an evaluation of the significance of paleontological, archaeological and historical resources and the impact on proposed development on those resources. The evaluation provided in this Initial Study would fulfill this mitigation measure. The

General Plan EIR includes an additional mitigation measure (MM-CR-3) that requires monitoring of grading operations by a qualified paleontologist when a site is reasonably suspected of containing paleontological resources. No evidence suggests that the project site is reasonably suspected of containing such resources. However, Mitigation Measure 5-2 below fulfills the intent of the General Plan mitigation measure by requiring work stoppage and further investigation in the event that paleontological resources are discovered during construction activity. As such, the proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Mitigation Measures

5-2 If paleontological materials are discovered during any grading or construction activity, work in the affected area shall stop and the contractor shall immediately notify the Applicant and the City of Carson. A paleontologist shall be consulted to determine the significance of the discovered fossil materials and, if necessary, formulate a mitigation plan. Work can resume in the affected area only with the approval of the paleontologist.

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

Less Than Significant Impact. A significant adverse impact could occur if grading or excavation activities associated with a project were to disturb previously interred human remains. Although no human remains are known to have been found on the project site, it is possible that unknown resources could be encountered during project construction, particularly during ground-disturbing activities such as grading. However, as required by state law, if human remains are discovered at the project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of Carson and County coroner shall be immediately notified. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission shall be notified within 24 hours, and the guidelines of the Native American Heritage Commission shall be adhered to in the treatment and disposition of the remains. Through compliance with these established procedures, project impacts to unknown human remains would be less than significant. The General Plan EIR includes a mitigation measure (MM-CR-1) to require, as part of the environmental review procedure, an evaluation of the significance of paleontological, archaeological and historical resources and the impact on proposed development on those resources. The evaluation provided in this Initial Study would fulfill this mitigation measure. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis. As discussed previously, Mitigation Measures 5-1 and 5-2 are recommended to ensure the proposed project does not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines and that the proposed project does not directly or indirectly destroy a unique paleontological resource. It is anticipated that comparable measures and compliance with existing regulations would be incorporated into the approval of future development in this area of the City. Additionally, as discussed above, the proposed project would not result in any impacts to historic resources. As such, cumulative impacts to cultural resources would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

6. GEOLOGY AND SOILS

The General Plan EIR evaluated the following potential impacts with respect to geologic and seismic hazards:

- **Fault Rupture** – Implementation of the proposed General Plan may result in geologic or seismic hazards with respect to rupture of a known earthquake fault.
- **Seismic Groundshaking** – Seismic groundshaking and secondary seismic effects in the City during an earthquake on the nearby regional faults may cause damage to development resulting from implementation of the proposed General Plan.
- **Liquefaction** – Implementation of the proposed General Plan may result in impacts related to liquefaction.
- **Landslides** – Implementation of the proposed General Plan may result in impacts related to landslides.
- **Soil Erosion** – Implementation of the proposed General Plan may result in impacts related to soil erosion or the loss of topsoil.
- **Unstable or Expansive Soils** – Implementation of the proposed General Plan may result in impacts related to expansive soils or soil strength.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Fault Rupture** – Less Than Significant Impact.
- **Seismic Groundshaking** – Less Than Significant Impact.
- **Liquefaction** – Less Than Significant Impact.
- **Landslides** – Less Than Significant Impact.

- **Soil Erosion** – Less Than Significant Impact.
- **Unstable or Expansive Soils** – Less Than Significant Impact.

The following section summarizes the information provided in the Geotechnical Feasibility-Level Investigation, Proposed Industrial Development, 16315 and 16325 South Avalon Boulevard, Carson, California, prepared by Geotechnical Professionals, Inc. dated August 29, 2011 (Geotechnical Report). The Geotechnical Report is provided as Appendix B to this Initial Study.

a) Would the project expose people or structures to 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.

Less Than Significant Impact. A significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone.

The project site is located in the seismically active region of southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Carson. However, there are no mapped active or potentially active faults identified by the State, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, known to be present on or beneath the project site. The site is located about 0.8 kilometers (0.5 miles) from the Newport Inglewood fault zone and 7.2 kilometers (4.5 miles) from the Compton Thrust fault zone. Thrust faults are not exposed at the surface and do not present a potential surface fault rupture hazard. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. Therefore, the potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low. Impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. Because the Los Angeles region is generally considered to be geologically active, most projects would be exposed to some risk from geologic hazards, such as earthquakes. Thus, in order to be considered a significant geologic impact, the project must exceed the typical risk of hazard for the region. Therefore, a significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically

induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California.

As with all properties in the seismically active Southern California region, the project site is susceptible to ground shaking during seismic events produced by local faults and it is likely that the proposed project would be shaken by future earthquakes generated in southern California. However, building construction would be required to comply with current seismic standards of the Uniform Building Code, which would reduce seismic risks to an acceptable level. Compliance with the Uniform Building Code would reduce impacts to a less than significant level with respect to seismic ground shaking. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project site is located within a liquefaction zone.

Liquefaction involves sudden loss in strength of a saturated, cohesionless soil (predominantly sand) caused by the build-up of pore water pressure during cyclic loading, such as that produced by an earthquake. This increase in pore water pressure can temporarily transform the soil into a fluid mass, resulting in vertical settlement and can also cause lateral ground deformations. Typically, liquefaction occurs in areas where there are loose sands and the depth to groundwater is less than 50 feet from the surface. Seismic shaking can also cause soil compaction and ground settlement without liquefaction occurring, including settlement of dry sands above the water table.

According to the State of California Seismic Hazard Zone, Hollywood Quadrangle Map (CDMG 1999), the site is not located within an area identified as having potential for liquefaction. The soils encountered during exploration exhibit a low potential for liquefaction because of the predominantly cohesive and dense nature of the subsurface materials. Therefore, impacts with respect to potential liquefaction would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

(iv) Landslides?

No Impact. A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a project-related significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest a high potential for sliding.

The project site and surrounding vicinity are generally flat. There are no known landslides near the site, nor is the site in the path of any known or potential landslides. As the probability of landslides, including seismically induced landslides, is considered to be very low at the project site, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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

Less Than Significant Impact. A project would normally have significant sedimentation or erosion impact if it would:

- Constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or
- Accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

The majority of the area surrounding the project site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the proposed project. During construction, the proposed project would be required to prevent the transport of sediments from the project site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in a Stormwater Pollution Prevent Program (SWPPP), which must be acceptable to the City of Carson and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

Long-term operation of the proposed project would not result in substantial soil erosion or loss of topsoil as the majority of the project site would be covered by the structure and paving, while the remaining portions of the project site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the proposed project.

With implementation of the applicable grading and building permit requirements and the implementation of applicable BMPs, less-than-significant impacts would occur related to erosion or loss of topsoil. Further discussion of erosion as it relates to surface water quality is provided in Section 9 (Hydrology and Water Quality).

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. A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or

infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

Potential impacts with respect to liquefaction and landslide potential are evaluated in Checklist Questions 6 (a)(iii) and 6 (a)(iv), above.

There is no evidence that the project site is susceptible to lateral spreading or subsidence. The site is not located on or near a hillside area and there are no known unique geologic conditions present that would suggest that the site is subject to unstable soil conditions. All construction would comply with the Building Code, which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. With the implementation of Building Code requirements (see discussion of Checklist Question 6(a)(ii), above), potential impacts due to landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

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

Less Than Significant Impact. A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

Undocumented fills extend to an approximate depth of 2 feet below existing grade. Documentation regarding the placement of fills was not provided. The fill soils are not considered to be suitable for direct support of foundations. Removal and recompaction of the upper soils is anticipated for site grading to support at-grade structures on spread footings. For foundations, overexcavation of about 5 to 6 feet below existing grade or 3 feet below the base of foundations is anticipated. For floor slabs, overexcavation of about 3 feet below existing grade is anticipated.

The natural soils at the project site consist of silty sands underlain by clayey sands and sandy clays interbedded with silty sands. The subsurface profile is relatively consistent across the site with the exception of boring B-4 where no sandy clays or clayey sands were encountered and the upper natural silty sand was underlain by 13 feet of sand. The upper silty sands are medium dense. The sandy clays encountered at depths ranging from 6 to 50 feet are stiff, with hard sandy clays encountered in one exploration. The deeper silty sands and clayey sands are general medium dense to dense. The soils at

and below the planned foundation level (estimated to be about 3 to 4 feet below existing grade) exhibit moderate strength and compressibility characteristics. Based on testing, the upper clayey soils have the potential for being moderately expansive. Although not anticipated to be encountered in significant amounts during grading, the clayey soils below depths of 5 feet are anticipated to be low to moderately expansive and should not be used as fill directly beneath concrete slabs-on-grade. It appears that the proposed industrial buildings can be supported on spread footings underlain by properly compacted fill. No evidence of extraordinary geotechnical constraints that have or will significantly impact the project site was found. Additional explorations and testing will be required for the design-level geotechnical study to provide detailed recommendations for design of foundations.

Construction of the proposed project would be required to comply with the UBC and the 2010 California Building Code, which include building foundation requirements appropriate to site-specific conditions. With compliance with existing regulations, and implementation of Mitigation Measure 6-1, impacts associated with soils would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Mitigation Measures

6-1 The proposed project shall be designed and constructed in accordance with the recommendations provided in a full Geotechnical Study, which shall be approved by the Building and Safety Division of the Development Services Department prior to issuance of building and grading permits.

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

No Impact. This question would apply to a project only if it was located in an area not served by an existing sewer system.

The project site is located in a developed area of the City of Carson, which is served by a wastewater collection, conveyance and treatment system operated by the County Sanitation Districts of Los Angeles County. The existing uses are connected to the County Sanitation Districts' sewer system and no septic tanks or alternative disposal systems neither are necessary, nor are they proposed. No impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the proposed project and any related projects. Similar to the proposed project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of future projects within the areas surrounding the project site would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the proposed project's geology and soils impacts concluded that project impacts would be less than significant. Therefore, the proposed project would not contribute to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

7. GREENHOUSE GAS EMISSIONS

The General Plan EIR did not address greenhouse gas emissions, as it was prepared in 2002 and pre-dated the passage of AB 32 in 2006.

Documentation:

Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation and temperature. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that there is a direct link between increased emission of GHGs and long-term global temperature. What GHGs have in common is that they allow sunlight to enter the atmosphere, but trap a portion of the outward-bound infrared radiation and warm up the air. The process is similar to the effect greenhouses have in raising the internal temperature, hence the name greenhouse gases. Both natural processes and human activities emit GHGs. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature; however, it is widely believed that emissions from human activities such as electricity generation and motor vehicle operations have elevated the concentration of GHGs in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to global climate change.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the

varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which Statewide emission of GHG would be progressively reduced, as follows:

- By 2010, reduce greenhouse gas emissions to 2000 levels;
- By 2020, reduce greenhouse gas emissions to 1990 levels; and
- By 2050, reduce greenhouse gas emissions to 80 percent below 1990 levels.

In response to Executive Order S-3-05, the Secretary of Cal/EPA created the Climate Action Team (CAT), which, in March 2006, published the Climate Action Team Report to Governor Schwarzenegger and the Legislature (the "2006 CAT Report"). The 2006 CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change greenhouse gas emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor's targets are met and can be met with existing authority of the State agencies.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (ARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide greenhouse gas emissions are reduced to 1990 levels by 2020.

As a central requirement of AB 32, the ARB was assigned the task of developing a Climate Change Scoping Plan that outlines the State's strategy to achieve the 2020 greenhouse gas emissions limit. This Scoping Plan, which was developed by the ARB in coordination with the CAT, includes a comprehensive set of actions designed to reduce overall greenhouse gas emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the State's emissions. Additional key recommendations of the Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards; increases in the amount of clean and renewable energy used to power the State; and implementation of a low-carbon fuel standard that will make the fuels used in the State cleaner. Furthermore, the Scoping Plan also proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. The Climate

Change Scoping Plan was approved by the ARB on December 11, 2008. According to the September 23, 2010 AB 32 Climate Change Scoping Plan Progress Report, 40 percent of the reductions identified in the Scoping Plan have been secured through ARB actions and California is on track to its 2020 goal.

Although not originally intended to reduce greenhouse gases, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2010 Title 24 standards (effective as of January 1, 2011) were adopted to respond, amongst other reasons, to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2011 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards ("CALGreen") Code (California Code of Regulations, Title 24, Part 11).

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. Construction and operation (i.e., use of the project site by tenants and mobile emissions associated with such use) of the proposed project would generate greenhouse gas emissions. In the absence of any adopted quantifiable thresholds of significance, a significant impact would occur if a project would be inconsistent with those applicable guidance documents issued in furtherance of AB 32 to date, including the 2006 CAT Report and the ARB Scoping Plan.[6]

Generally, the evaluation of an impact under CEQA requires measuring data from a project against a "threshold of significance."[7] Furthermore, "when 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."[8] For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact.

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[6] *Compliance with AB32 and associated implementation mechanisms as a threshold for determining the significance of GHG emissions was recently upheld in Citizens for Responsible Equitable Environmental Development v. City of Chula Vista (D057779, July 8, 2011).*

[7] *CEQA Guidelines Section 15064.7.*

[8] *CEQA Guidelines Section 15064.7(c).*

CEQA also requires projects to be evaluated for consistency with "applicable general plans, specific plans and regional plans."[9] Such plans would include, for example, the applicable air quality attainment or maintenance plan, regional blueprint plans, sustainable community strategies, and climate action plans. These plans involve legislative or regulatory programs applicable to all projects within the region and establish standards that are independent of the impact analysis described in the CEQA Guidelines.[10] As of the date that this MND was prepared, the SCAQMD has yet to adopt any plans. Therefore, there is no local, regional or statewide plan regulating global warming by which the proposed project can be measured.

Notwithstanding the analytical challenges posed by climate change, CEQA Guidelines Section 15002(a)(1) states that one of the basic purposes of CEQA is to "inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities." Therefore, this evaluation of the proposed project's potential for contribution to global climate change will analyze that potential in a manner and to an extent reasonably consistent with the policy underpinnings of CEQA.

This analysis is the result of the City's thorough investigation of the proposed project's impact on global climate change, including a review of Executive Order S-305, AB 32 and the legislative intent behind AB 32, as well as extensive review of scientific literature regarding global climate change. Every effort has been made to maximize the disclosure of information to the public, fairly present the proposed project's potential for significant adverse effects on global climate change, and identify techniques to minimize any such effects.

At the present time, there is no consensus within the scientific community on any given approach. As the California Air Pollution Control Officer's Association (CAPCOA) observes, "many legal and policy questions remain unsettled, including the requirements of CEQA in the context of greenhouse gas emissions." Given this uncertainty, many organizations, including public, private and civic, have released advisories or guidelines with recommendations to assist decision makers on how to best evaluate GHG emissions. The City cannot, and need not, under CEQA, review every report from an expert or agency, as new reports are released on an almost daily basis. The City has, however, reviewed multiple key advisories, comment letters, and white papers from experts, agencies, and groups such as the Climate Action Team, the California Attorney General, CAPCOA, the ARB, the Center for Biological Diversity, the League of California Cities, the Sierra Club, the California State Association of Counties, the Association of Environmental Professionals, and the California Chapter of the American Planning Association. Some

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[9] *CEQA Guidelines Section 15125(d).*

[10] *CEQA Guidelines beginning with Section 15126.*

of these reports urge "zero emission" thresholds, while others advocate against them. Others evaluate multiple thresholds, such as CAPCOA's January, 2008 white paper, which analyzes: (1) CEQA with no GHG thresholds; (2) CEQA with a GHG threshold of zero; and (3) CEQA with non-zero thresholds. In short, there is no consensus on how to analyze climate change in CEQA documents, and no specific methodology that is universally accepted.

CEQA defines a "significant effect on the environment" as a substantial, or potentially substantial, adverse change in the environment.[11] With respect to global climate change, no one project can individually create a direct impact on what is a global problem (i.e., no project will, by itself, raise the temperature of the planet).

However, the emissions generated by a project may be "cumulatively considerable," meaning "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."[12] The CEQA Guidelines add that 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.[13]

In the absence of State, SCAQMD, or City guidelines, construction and operational greenhouse gas emissions for the proposed project have been calculated using the CalEEMod computer model and are shown in Table IV-6 (Estimated Project Construction and Operational Greenhouse Gas Emissions). Also included in this table is the California Energy Commission's estimated 2004 State-wide inventory, the latest year for which data are available. As shown, the operational emissions generated by the proposed project are approximately 0.00063 percent of the 2004 statewide emission level.[14] Moreover, the proposed project would replace the existing older building at the site with new construction meeting CALGreen requirements.

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[11] *Public Resources Code Section 21068.*

[12] *CEQA Guidelines Section 15065(a)(3).*

[13] *CEQA Guidelines Section 15064(h)(3).*

[14] *In September, 2010, SCAQMD proposed a screening threshold of 3,000 metric tons of GHG emissions annually for all land use types. Although not yet adopted as a formal threshold by SCAQMD, the proposed project's emissions would be below this level.*

Table IV-6
Estimated Project Operational Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions in Metric Tons per Year
Construction	
2012	447.59
2013	114.62
Operation	
Area Sources	0.00
Energy Sources	295.14
Mobile Sources	1,431.95
Waste Disposal	565.01
Water & Wastewater	7.60
Project Total	2,299.70
2004 Statewide Total[a]	364,000,000
Project Increase as a Percentage of 2004 Statewide Total	0.00063

[a] *Statewide totals were derived from the California Energy Commission: http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF, accessed on September 6, 2010.*

Source: Cadence Environmental Consultants, 2011. Calculation sheets are provided in Appendix C.

The consistency of the proposed project with the strategies from the 2006 CAT Report and measures from the ARB's Scoping Plan that are applicable to the proposed project is evaluated in Tables IV-7 (Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies) and IV-8 (Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures), respectively. As shown, the proposed project would be consistent with all feasible and applicable strategies of the 2006 CAT Report and the recommended measures of ARB Scoping Plan to reduce greenhouse gas emissions in California. Therefore, the City of Carson, as Lead Agency, finds that the impact of the proposed project would be less than significant with regard to greenhouse gas emissions.

Table IV-7
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Air Resources Board	
Vehicle Climate Change Standards AB 1493 (Pavley) required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by the ARB I September 2004.	**Consistent** The proposed project would not manufacture new passenger vehicles or light duty trucks that would be subject to ARB regulations. The vehicles that travel to and from the project site on public roadways would be in compliance with ARB vehicle standards that are in effect at the time of vehicle purchase. The proposed project would not interfere with the statewide implementation of these regulations.
Diesel Anti-Idling In July 2004, the ARB adopted a measure to limit diesel-fueled commercial motor vehicle idling.	**Consistent** Current State law restricts diesel truck idling to five minutes or less. Diesel trucks making deliveries to the project site are subject to this statewide law. The proposed project would not interfere with the statewide implementation of these regulations.
Hydrofluorocarbon Reduction 1) Ban retail sale of HFC in small cans. 2) Require that only low GWP refrigerants be used in new vehicular systems. 3) Adopt specifications for new commercial refrigeration. 4) Add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs. 5) Enforce federal ban on releasing HFCs.	**Consistent** This strategy applies to consumer products. All applicable products purchased within California by project tenants would comply with the regulations that are in effect at the time of manufacture. The proposed project would not interfere with the statewide implementation of this strategy.
Alternative Fuels: Ethanol Increased use of E-85 fuel.	**Consistent** The proposed project does include a gas station that could offer E-85 fuel for purchase and does not manufacture new passenger vehicles or light duty trucks that could use E-85 fuel. Employees and tenants of the project site could purchase flex-fuel vehicles and utilize this fuel once it is commercially available in the region and local vicinity. The proposed project would not interfere with the statewide implementation of this strategy.

Table IV-7
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Heavy-Duty Vehicle Emission Reduction Measures Increased efficiency in the design of heavy duty vehicles and an education program for the heavy duty vehicle sector.	**Consistent** The proposed project would not manufacture new heavy-duty vehicles that would be subject to increased design efficiency. The heavy-duty vehicles that travel to and from the project site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture. The proposed project would not interfere with the statewide implementation of this strategy.
Achieve 50% Statewide Recycling Goal Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48% has been achieved on a statewide basis. Therefore, a 2% additional reduction is needed.	**Consistent** As discussed in Section 17(f), Utilities and Service Systems, the proposed project would comply with applicable regulations for the reduction of solid waste materials that are disposed of in landfills.
Zero Waste – High Recycling Efforts to exceed the 50 percent goal would allow for additional reductions in climate change emissions.	**Consistent** As discussed in Section 17(f), Utilities and Service Systems, the proposed project would divert at least 50 percent of its solid waste after the recyclable content is diverted. The project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future.
Department of Forestry	
Urban Forestry A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	**Consistent** New landscaping materials would be provided at the project site.
Department of Water Resources	
Water Use Efficiency Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce greenhouse gas emissions.	**Consistent** As discussed above and in Section 17(b), Utilities and Service Systems, the proposed project would comply with the State and City mandatory water conservation measures.

Table IV-7
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Energy Commission (CEC)	
Building Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).	**Consistent** The proposed project will be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. The current 2010 Title 24 standards (effective as of January 1, 2011) were adopted by the State to respond, amongst other reasons, to the requirements of AB 32.
Appliance Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).	**Consistent** Under State law, appliances that are purchased for the project – both pre- and post-development – would be consistent with energy efficiency standards that are in effect at the time of manufacture.
Fuel-Efficient Replacement Tires & Inflation Programs State legislation established a statewide program to encourage the production and use of more efficient tires.	**Consistent** Employees and tenants of the project site could purchase tires for their vehicles that comply with State programs for increased fuel efficiency. The proposed project would not interfere with the statewide implementation of this strategy.
Alternative Fuels: Non-Petroleum Fuels Increasing the use of non-petroleum fuels in California's transportation sector, as recommended in the CEC's 2003 and 2005 Integrated Energy Policy Reports.	**Consistent** Employees and tenants of the project site could purchase alternative fuel vehicles and utilize these fuels once they are commercially available in the region and local vicinity. The proposed project would not interfere with the statewide implementation of this strategy.
Business, Transportation and Housing	
Measures to Improve Transportation Energy Efficiency Builds on current efforts to provide a framework for expanded and new initiatives including incentives, tools and information that advance cleaner transportation and reduce climate change emissions.	**Consistent** The location and nature of the project promotes fuel conservation through nearby access to public transportation and jobs.
Smart Land Use and Intelligent Transportation Systems (ITS) Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial	**Consistent** The project locates a new warehouse use within walking distance of existing commercial uses. The project site is also located in an area with opportunities

Table IV-7
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
development along transit corridors. ITS is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services. The Governor is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through state investments, incentives and technical assistance, land use, and technology strategies that provide for a prosperous economy, social equity and a quality environment. Smart land use, demand management, ITS, and value pricing are critical elements in this plan for improving mobility and transportation efficiency. Specific strategies include: promoting jobs/housing proximity and transit-oriented development; encouraging high density residential/commercial development along transit/rail corridor; valuing and congestion pricing; implementing intelligent transportation systems, traveler information/traffic control, incident management; accelerating the development of broadband infrastructure; and comprehensive, integrated, multimodal/intermodal transportation planning.	for the project employees to use public transit rather than automobiles.
State and Consumer Services Agency	
Green Buildings Initiative Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. The Executive Order and related action plan spell out specific actions state agencies are to take with state-owned and –leased buildings. The order and plan also discuss various strategies and incentives to encourage private building owners and operators to achieve the 20 percent target.	**Consistent** The project building would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. The current 2010 Title 24 standards (effective as of January 1, 2011) were adopted by the State to respond, amongst other reasons, to the requirements of AB 32.

Table IV-7
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Solar Initiative The solar initiative includes installation of 1 million solar roofs or an equivalent 3,000 MW by 2017 on homes and businesses, increased use of solar thermal systems to offset the increasin demand for natural gas, use of advanced metering in solar applications, and creation of a funding source that can provide rebates over 10 years through a declining incentive schedule.	**Consistent** Solar panels are not proposed for the project at this time. However, the project building would have flat surfaces that could support the installation and use of solar equipment when and if it becomes cost effective from a purchase and maintenance standpoint of the property owners. The project would not preclude the installation and use of solar equipment at the project site.
Sources: Climate Action Team, 2006 and Cadence Environmental Consultants, 2011.	

Table IV-8
Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
Energy Efficiency Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).	**Consistent** The project building would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. The current 2010 Title 24 standards (effective as of January 1, 2011) were adopted by the State to respond, amongst other reasons, to the requirements of AB 32.
Million Solar Roof Program Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Consistent** Solar panels are not proposed for the project at this time. However, the project building would have flat surfaces that could support the installation and use of solar equipment when and if they become cost effective from a purchase and maintenance standpoint of the property owners. The project would not preclude the installation and use of solar equipment at the project site.

Table IV-7
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Green Building Strategy Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent** The project building would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. The current 2010 Title 24 standards (effective as of January 1, 2011) were adopted by the State to respond, amongst other reasons, to the requirements of AB 32.
Recycling and Waste Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent** As discussed in Section 17(f), Utilities and Service Systems, the proposed project would comply with applicable regulations for the reduction of solid waste materials that are disposed of in landfills.
Water Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent** As discussed above and in Section 17(b), Utilities and Service Systems, the proposed project would comply with the State and City's mandatory water conservation measures.
Sources: California Air Resources Board, 2008 and Cadence Environmental Consultants, 2011.	

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

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with the AB 32 Scoping Plan or other applicable plans designed to reduce greenhouse gas emissions such as a Climate Action Plan, or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of such a plan.

See response to Section 7(a), above.

Cumulative Impacts

As discussed above, emitting GHGs into the atmosphere is not itself and adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere that may result in global climate change; the consequences of which may result in adverse environmental effects. The State has mandated a goal of reducing state-wide emissions to 1990 levels by 2020, even though state-wide population and commerce is expected to grow substantially. However, the proposed project would be consistent with all applicable strategies from the 2006 CAT Report and all applicable measures from the

ARB Scoping Plan. The development that would occur under the proposed project would not result in an unplanned level of development and does not represent a substantial new source of GHG emissions. For these reasons, the contribution of the project to the cumulative effect of global climate change is not cumulatively considerable.

8. HAZARDS AND HAZARDOUS MATERIALS

The General Plan EIR evaluated the following potential impacts with respect to public health and safety:

- **Hazardous Materials Use, Generation and Transport** – New commercial or industrial development in accordance with the proposed General Plan may result in an increased risk of upset associated with the routine use, generation and transport of hazardous materials, which may pose a health or safety hazard.
- **Accidental Release of Hazardous Materials** – Accidental release of hazardous materials used, stored or transported in the City may result in a public health risk.
- **Air Toxic Materials** – Development in the City of Carson in accordance with the proposed General Plan may result in additional sources of air toxic emissions, potentially increasing exposure of residents and employees to air toxins.
- **Oil Contamination** – Development in accordance with the proposed General Plan may pose a health or safety hazard as a result of existing oil facilities.
- **Landfills** – Development in accordance with the proposed General Plan may pose a health or safety hazard as a result of existing landfills.
- **Aircraft Overflight** – The accident potential from aircraft overflights may impact structures and individuals within the flight pattern of the Los Angeles terminal control area.
- **Rail Line Hazards** – Development in accordance with the proposed General Plan may result in an increased hazard associated with train operations.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Hazardous Materials Use, Generation and Transport** – Less Than Significant Impact.
- **Accidental Release of Hazardous Materials** - Significant and Unavoidable Impact.
- **Air Toxic Emissions** – Significant and Unavoidable Impact.
- **Oil Contamination** – Significant and Unavoidable Impact.
- **Landfills** – Significant and Unavoidable Impact.
- **Aircraft Overflight** – Less Than Significant Impact.
- **Rail Line Hazards** - Less Than Significant Impact.

The following section summarizes the information provided in the Phase I Environmental Site Assessment 16325 South Avalon Boulevard/455 Gardena Boulevard, Carson, California, prepared by Hazard Management Consulting (HMC), August 5, 2011 (Phase I ESA). The Phase I ESA is provided as Appendix D-1 to this Initial Study. This section also incorporates the information provided in the Subsurface Investigation 16325 Avalon Boulevard, Carson California, prepared by HMC, September 16, 2011 (Subsurface Investigation). This report is provided as Appendix D-2 to this Initial Study.

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. A project would normally have a significant impact to hazards and hazardous materials if:

- The project involved a substantial risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or
- The project involved the creation of any health hazard or potential health hazard.

Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area include the mobile home park located adjacent to the western boundary of the project site. Specific tenants of the proposed project are not known at this time. Because the proposed project would be able to accommodate light industrial tenants, hazardous materials could potentially be used, transported or disposed of in conjunction with the routine day-to-day operations of the proposed project. However, it is expected that the tenants would be knowledgable and qualified in the use of such materials and it can reasonably be expected that such use would be compliance with existing and future federal, state and local regulations, and would therefore not pose an undue risk of accidental explosion or release or creation of a health hazard. In addition, as described in more detail below in Section 8(b), there are no Aboveground Storage Tanks (AST's) or remaining Underground Storage Tanks (UST's) for storing hazardous materials.[15] However, due to the age of the existing on-site structure, prior to demolition of this structure, a lead-based paint survey and a demolition-level asbestos survey would be conducted at the project site as discussed in Section 8(b) and in Mitigation Measures 8-1 thru 8-3 and, if discovered, would be removed per standard abatement and disposal procedures in accordance with existing regulations and overseen by regulatory agencies. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and a less than significant impact would occur. The proposed project would not

[15] *Phase I Environmental Site Assessment, 16325 South Avalon Boulevard/455 Gardena Boulevard, Carson, California, prepared by Hazard Management Consulting, August 5, 2011.*

represent a new significant impact or substantial increase in the severity of previously identified impacts.

b) Would the project create 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. A project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a substantial risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or
- A project involved the creation of any health hazard or potential health hazard.

The Phase I ESA was conducted in general conformance with the scope and limitations of ASTM Standard Practice E1527-05. The analysis consisted of: (1) site inspection; (2) interviews with personnel familiar with the site; (3) regulatory data base records review; (4) review of previous reports prepared for the site; and (5) review of historical references.

Review of Historical Site Use

The review of historical site use identified that the property was undeveloped and part of what appeared to be a large tract of open land in an area of predominantly agricultural activity prior to 1947. By 1956, the site appears to be in use for nursery operations which continue to be present until at least 1994. By the time of the 2002 photograph, the site had been cleared except for the flag lot containing an industrial building. No specific features of concern were noted on the project site from the aerial photographs reviewed.

The 455 Gardena Boulevard property comprises approximately 0.47 acres and contains an abandoned industrial building. The property was undeveloped, vacant land from at least 1938 to 1963. The current concrete tilt-up building was reportedly constructed in 1966 for use as a machine shop, although more recently the building was utilized by a “fiberglass company.” There has been no indicatoion, based on regulatory databases and files that large quantities of chemicals have ever been used at this property.

Review of City Directories

Based on a review of City directories, the only occupant noted on site in the business directory was the former nursery, K&Y Nursery (or variations of that name). The surrounding businesses were reviewed and no names were noted that raised any suspicions regarding activities that could lead to concerns at the project site.

Previous Investigations

Previous investigations have been conducted at the site including a Phase 1 ESA prepared by ATC in 1999 (Phase 1 report). Based on the findings of the ESA, a Phase 2 investigation was conducted by S&S Environmental (Phase 2 report). Targhee was retained to remediate the site based on the findings of the S&S report, which was reviewed an overseen by the Los Angeles County Fire Department (LACFD), which issued a No Further Action (NFA) letter in 2007.

The Phase 1 report identified that underground storage tanks (USTs) were formerly located on the property and used to store gasoline. The Phase 1 report did not identify any environmental concerns beyond the USTs. A report prepared by John L. Hunter & Associates, Inc. dated March 5, 1998 documented the removal of two USTs and soil sampling conducted as part of the removal process. No odors or staining of the underlying soil was encountered and confirmation sampling reported non-detectable levels in the samples. Only two of the three tanks reportedly permitted for the site were removed. After additional review and discussions with the Los Angeles County Department of Public Works (DPW) who served as the lead agency, it was concluded that the third tank must have been an aboveground storage tank (AST). No evidence of a release was noted and DPW issued a No Further Action letter. In the Phase 1 report, ATC reviewed additional maps and drawings and concluded that a third tank could be present on site and considered this potential an environmental concern. In addition, the Phase 1 report identified the presence of a sump on the west side of the site and a cesspool with attendant leach field to be potential environmental concerns. The Phase 1 report also noted the presence of an idle irrigation well on the project site. The Phase 1 report recommended that additional investigations be conducted to further evaluation these potential concerns.

The Phase 2 report was undertaken in 2003 to investigate and follow up on the concerns identified in the Phase 1 report as well as to sample soil on site based on the historical use of the property as a nursery. A geophysical survey using a magnetometer was conducted to locate the cesspool, the third suspect UST and the irrigation well, while 11 borings were advanced in areas of concern. The suspect tank was located while no evidence of a cesspool was uncovered. Elevated concentrations of one pesticide, Chlordane, were discovered. In addition, the irrigation well was located. S&S remobilized to the property in August 2003 to conduct additional investigations. Fifteen borings were drills to a depth of up to 15 feet below ground surface (bgs). Nine borings were drilled in the vicinity of a cistern (separate from the cesspool identified in the Phase 1 report) while the remainder were placed at generally random locations. Out of the 25 samples collected for the analysis, seven were reported to contain concentrations of chlordane as well as DDT in the area of the cistern. The Phase 2 report recommended that soil containing pesticide concentrations above actionable levels be remediated under the oversight of LACFD.

The property owners submitted the prior reports to LACFD for regulatory oversight. The LACFD directed the owners to conduct additional characterization of the areas of concern. A work plan was developed and approved in July 2006. Based on the additional characterization, a remedial action plan was developed and approved by LACFD. A total of approximately 2,300 tons of soil was removed from the project site and disposed off-site at approved landfills. Confirmation soil samples were collected to confirm removal of the impacted soils below the proposed cleanup goals. The remaining UST was removed and the former irrigation well was abandoned. The site was confirmed to be suitable for any future use without any environmentally based restrictions in a NFA letter issued by LACFD on July 30, 2007.

The historic UST removals and soil remediation to address pesticide contamination would be considered historic environmental concerns. However, since No Further Action letters were issued after the remediation was complete, they would no longer represent environmental concerns. Impacts associated with these conditions would be less than significant.

Regulatory Data Base Records Review

A search of federal, state, tribal and local databases containing known and suspected sites of environmental contamination was conducted. Five off-site locations with the potential to affect the project site were identified.

1. TP Industries, Inc. (TPI), 523 East Alondra Boulevard: This site is located approximately one-quarter mile north of the project site. The site was historically a hazardous waste treatment facility and solvent recycler. Releases of solvents (i.e., Volatile Organic Compounds [VOCs]) to soil and groundwater have occurred at this facility which is being regulated by the Department of Toxic Substances Control (DTSC). A plume of contaminated groundwater has migrated west and south of the facility. Reported solvents present in the groundwater downgradient of the project site indicate that the plume has likely impacted the project site. Based on sampling and testing conducted to date, it is likely that the plume of solvents has migrated under the project site and would be considered an environmental concern. While TPI is ultimately responsible for investigation and remediation, it is unclear if vapor barriers will be required under future buildings on the project site and if TPI would have the resources to address such a requirement.
2. A&J Environmental Services aka Avalon Glass, 642 East Alondra Boulevard: This facility is located within one-quarter mile upgradient of the project site. While the facility is listed as both a generator of hazardous wastes and having experienced a release to the subsurface environment, the remedial case is reportedly closed. This site does not pose a hazard to the project site.
3. Carson Dump, 2701-2801 West Alondra Boulevard: There is a generic listing for the Carson Dump in several of the data bases searched with no relevant information. It appears this facility

is a historic municipal dump site that was placed on a regulatory list but has not been investigated to date. No opinion is offered as to whether this facility has impacted the project site, but it is noted that such facilities often have methane in soil gas and leachate impacting groundwater.

4. Cal Pacific Dyeing and Finishing, 505 Gardena Boulevard: This site is adjacent to the flag lot on Gardena Boulevard. A leaking underground storage tank was reported and addressed at this location leading to a closure and NFA letter. This site does not pose a hazard to the project site.
5. Coronet Manufacturing, 16210 South Avalon Boulevard: This facility is located across Avalon Boulevard from the project site. It is on various agency listings for chemical use and air discharges. No listings indicate that a release has occurred from this facility. This site does not pose a hazard to the project site.

With respect to the potential contaminated groundwater plume beneath the project site, DTSC raised concerns over the potential for impacted groundwater to off gas VOCs into overlying structures. In response, the Subsurface Investigation was undertaken to assess the need for engineering controls related to soil gas migration into overlying buildings. Selected soil gas samples were collected throughout the project site at depths of 5 and 25 feet below ground surface (bgs) and analyzed for VOCs. The results were compared to published health-based criteria (i.e., California Human Health Screening Levels [CHHSLs]). Based on the results, no detectable to low concentrations of VOCs were detected throughout most of the site, with the exception of three shallow samples collected at 5 feet bgs which showed concentrations of tetrachloroethylene (PCE) or benzene at concentrations slightly exceeding the conservative CHHSL values. Although these concentrations were shown to slightly exceed the CHHSL values, the Subsurface Report concluded that there is a low likelihood that the detected concentrations would pose a health risk if a detailed health risk assessment was conducted.

Shallow soil sampling at the 455 Gardena Boulevard property was completed in 2003 and 2006 to further assess “mixers”, 55-gallon drums and a surface stain associated with the former fiberglass company. Laboratory results indicated no detectable to low concetrations of petroleum hydrocarbons and VOCs. The soil investigation completed in 2006 indicated low concentrations of PCE and cis-1,2-dichloroethylene (DCE) in one sample collected at 1 foot bgs. Laboratory results of the 5 foot bgs sample indicated no detectable concentrations of cis-1,2-DCE and very low concentrations (at the laboratory reporting limit) of PCE. Based on this information, the LACFD issued a No Further Action letter for this site.

Laboratory results of a soil gas sample collected from a soil gas point located in the 455 Gardena Boulevard property indicated elevated concentrations of trichloroethylene (TCE), PCE and cis-1,2-DEC at 25 feet bgs, with lesser concentrations in shallow (5 bgs) samples. Because low concentrations of VOCs were reported in the shallow soil gas sample and no detectable to low concentrations have been reported in shallow soil samples, the Subsurface Report concludes that there is a low likelihood that a

release of VOCs has occurred from the site. Due to the lack of reported use of chlorinated solvents at the site, industrial land use in the immediate site vicinity and laboratory results of soil gas indicating more elevated concentrations at depth, the Subsurface Report concludes there is a high likelihood that these concentrations are due to an off-site source.

Three soil borings were drilled on the 455 Gardena Boulevard property to further assess possible impacted soils due to historic land uses. Soil samples were collected at 5 and 10 feet bgs and screened in the field for odors, staining and elevated photoionization detector (PID) readings. No stained or oodorous soil, or elevated PID measurements were observed. Based on this information, the soil samples collected at 5 feet bgs were analyzed for petroleum hydrocarbons and VOCs. Laboratory results indicated do detectable concentrations of petroleum hydrocarbons or VOCs.

Based on the concentrations of VOCs detected at the site, the Subsurface report concludes that no engineering controls would be necessary for future buildings on the project site.

Interviews

No information was developed during interviews with owners, site managers, past owners, operators, occupants or others that would suggest any environmental concerns at the project site.

Site Inspection

A site reconnaissance of the project site and adjacent properties was conducted in order to obtain information indicating the likelihood of environmental concerns at the project site and adjacent sites. No concerns were identified during the site reconnaissance.

Asbestos-Containing Materials

Given the date of construction of the existing building, there is the potential that asbestos containing materials (ACM) may be present in the existing building. Potential ACM include the roof and certain vinyl tile and mastic in the bottom floor offices.

Asbestos removal is stringently controlled by Federal Regulations and SCAQMD Rule 1403. However, removal of ACM in a building is not unusual and can be readily accomplished. In accordance with the EPA's NESHAP regulation and SCAQMD Rule 1403, all materials which are identified as ACM would be removed by a trained and licensed asbestos abatement contractor before demolition. The asbestos removal operations would be conducted in accordance with Cal-OSHA Asbestos for the Construction Industry Standard, SCAQMD and EPA rules and regulations and industry standards. Generally, asbestos removal operations are low risk. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. Regulations include the

requirement of conducting the removal of certain ACM from within enclosed work areas, keeping the ACM wet during removal to reduce dust, ensuring that employees wear protective equipment, and collecting air samples during the removal operations to ensure that airborne fiber levels are within acceptable levels. Adhering to these and other asbestos regulations and implementing Mitigation Measures 8-1 and 8-2 would ensure that the ACM removal and demolition activities do not present significant exposure potential to the residential and school uses in the vicinity of the project site.

Lead-Based Paint

Given the date of construction of the existing building, there is the potential that lead-based paint (LBP) may be present in the existing building. Structures built prior to 1978 and especially prior to the 1960s should be expected to contain LBP. All observed painted surfaces within the existing building were in good condition and are not expected to pose a health and safety concern to existing residents.

Exposure of persons to LBP during demolition activities would also constitute a potentially significant hazardous material impact. Provided the removal and disposal of LBP from the project site follows the various required guidelines and implementation of Mitigation Measures 8-1 and 8-3 occurs, hazardous materials impacts relative to exposure to lead would be less than significant.

As discussed in Section 8(a), any hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the proposed project would be expected to be handled by qualified personnel in accordance with existing regulations. Thus, there would not be a significant hazard related to accidental release of hazardous materials into the environment once the project is occupied.

With implementation of the following mitigation measures, project impacts associated with hazards and hazardous materials would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Mitigation Measures

8-1 Comprehensive surveys for ACM and LBP shall be completed for all buildings on the project site.

8-2 If ACM are found to be present in the on-site structures, prior to the issuance of the demolition permit for the building, the Applicant shall provide a letter/report to the City from a qualified asbestos abatement contractor identifying the location of ACM present in any of the structures. ACM shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and regulations

(including, but not limited to California Health and Safety Code, Division 20. Chapter 6.5) prior to other demolition activities at the project site.

8-3 If LBP is found to be present in the structures, prior to the issuance of the demolition permit for the structures, the Applicant shall provide a letter to the City from a qualified lead paint abatement contractor demonstrating that while LBP is present in the structures, it shall be abated in compliance with applicable state and federal rules and regulations governing LBP and LCP abatement prior to other demolition activities of the structures. The qualified lead paint abatement contractor shall comply with Cal-OSHA Construction Safety Orders, California Code of Regulations, Title 8, Section 1532.1 and with the California Health and Safety Code, Division 20, Chapter 6.5 for the evaluation, handling and transport of materials containing LBPs and LCPs.

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?

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a substantial risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or
- A project involved the creation of any health hazard or potential health hazard.

The closest school to the project site is the Ralph Bunche School located approximately 0.2 miles east of the project site. However, as stated in 8(a), above, the proposed project would not pose any substantial potential for accident conditions involving the release of hazardous materials. Similarly, abatement of ACMs and LBPs found at the project site would comply with the mitigation measures set forth above, and would not pose any substantial potential for accident conditions involving the release of hazardous materials. Therefore, the proposed project would not create a significant hazard through hazardous emissions or the handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and a less than significant impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

d) Would the project be located on a site which 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?

No Impact. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

As discussed in Section 8(b), the project site is not on a list of hazardous materials sitesTherefore no impact would occur related to hazardous materials sites. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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 for people residing or working in the project area?

Less Than Significant Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

The closest public airport to the project site is the Compton/Woodley Airport, located approximately one mile east of the project site. The proposed project does not include high rise buildings that would impact flight operations and would not pose a safety hazard for people residing or working in the project area. Impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard.

The project site is not located in the vicinity of a private airstrip. Therefore, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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

No Impact. A project would normally have a significant impact to hazards and hazardous materials if it involved possible interference with an emergency response plan or emergency evacuation plan.

The proposed project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way (see Section 16, Transportation/Traffic, of this Initial Study). Therefore, the proposed project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. A significant impact would occur if the project site is located in proximity to wildland areas and poses a significant fire hazard, which could affect persons or structures in the areas in the event of a fire.

The project site is located in a highly urbanized area of Carson and does not include wildlands or high fire hazard terrain or vegetation. Therefore, no impacts from wildland fires would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed project in combination with the related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Carson. However, the potential impact associated with the proposed project would be less than significant and, therefore, not cumulatively considerable. With respect to the future development projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with related projects. Therefore, with compliance with local, state and federal laws pertaining to hazardous materials, the proposed project in conjunction with related projects would be expected to result in less than significant cumulative impacts with respect to hazardous materials. The proposed project would

not represent a new significant impact or substantial increase in the severity of previously identified impacts.

9. HYDROLOGY AND WATER QUALITY

The General Plan EIR evaluated the following potential impacts with respect to hydrology and drainage:

- **Water Quality Standards and Waste Discharge Requirements** – Future construction activities and post-construction uses resulting from implementation of the proposed General Plan may violate water quality standards or waste discharge requirements.
- **Groundwater Depletion** – Implementation of the proposed General Plan may result in impacts associated with depletion of groundwater supplies and interfere with groundwater recharge.
- **Drainage and Runoff** – Implementation of the proposed General Plan may result in impacts to drainage patterns in the City of Carson that may lead to erosion, siltation or surface water runoff. In addition, implementation of the proposed General Plan may create or contribute runoff water to the stormwater drainage system in the City.
- **Flooding/Dam Inundation** – Implementation of the proposed General Plan may result in potential flooding impacts within the City of Carson.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Water Quality Standards and Waste Discharge Requirements** – Less Than Significant Impact.
- **Groundwater Depletion** - Significant and Unavoidable Impact.
- **Drainage and Runoff** – Less Than Significant Impact.
- **Flooding/Dam Inundation** – Less Than Significant Impact.

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact With Mitigation. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources

Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

The Los Angeles Regional Water Quality Control Board (LARWQCB) issued a Municipal Storm Water NPDES Permit (No. CAS004001) in December 2001 that requires new development and redevelopment projects to incorporate storm water mitigation measures. Under the Municipal Storm Water NPDES Permit, redevelopment is defined as any land-disturbing activity that "results in the creation, addition, or replacement of 5,000 sf or more of impervious surface area on an already developed site." Depending on the type of project, either a Standard Urban Stormwater Mitigation Plan (SUSMP) or a Site Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves the project site. Site Specific Mitigation Plans are only required for the following uses: vehicle or equipment fueling, maintenance, washing, and repair areas; commercial or industrial waste handling or storage; outdoor handling or storage of hazardous materials; outdoor manufacturing areas; outdoor food handling or processing; outdoor animal care, confinement, or slaughter; outdoor horticultural activities; and major transportation projects. The proposed project would not involve any of these uses. Therefore, the proposed project would not be required to implement a Site Specific Mitigation Plan.

The proposed project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe). Additionally, the Applicant would be required to prepare and implement a SUSMP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SUSMP would detail the treatment measures and Best Management Practices (BMPs) to control pollutants and an erosion control plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of project development. One specific measure proposed to be included in the proposed project is an approximately 16,000 square foot detention/treatment basin to be provided along part of the western edge of the project site. Construction-phase housekeeping measures for control of contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides would be contained within the project Storm Water Pollution Prevention (SWPP) Plan. The SWPP Plan would contain BMPs to minimize primarily construction-related water quality impacts, but also contains some permanent BMPs. The SUSMP consists of structural BMPs built into the project for ongoing water quality purposes over the life of the project. These BMPs are outlined in greater detail in the following Mitigation Measure 9-1. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level. Through preparation and implementation of both the SWPP Plan and the SUSMP and implementation of a storm water quality treatment system, water quality impacts of the project would be minimized. Additionally, because the current site does not currently operate under a SUSMP, implementation of the proposed project with a SUSMP would improve water quality leaving the project

site in comparison to existing conditions. Thus, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. A project would normally have a significant impact on groundwater level if it would:

- Change potable water levels sufficiently to:
  - Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought;
  - Reduce yields of adjacent wells or well fields (public or private); or
  - Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction in groundwater recharge capacity.

The proposed project does not include deep excavations that would have the potential to encounter groundwater or aquifers. Grading activities associated with the proposed project would not result in the alteration of groundwater flows beneath the project site. Construction of the proposed project would be required to comply with the City Building Code. Impacts associated with the depletion of groundwater supplies or interference with groundwater recharge would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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, in a manner, which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact with Mitigation. A project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

Construction is regulated by the City's Building Code. The Building Code provides requirements for construction, grading, excavations, use of fill, and foundation work including type of materials, design, procedures, etc., which are intended to limit the probability of occurrence and the severity of consequences from sedimentation and erosion. Necessary permits, plan checks, and inspections are specified. Under the NPDES, the State Water Resources Control Board has issued two general stormwater discharge permits for Los Angeles County to cover industrial and construction activities. The permits are required for specific industry types based on standard industrial classification and for construction activities on five acres or more.

The RWQCB oversees implementation and enforcement of the general permits, including Waste Discharge Requirements (WDR). The Public Works Department is the agency responsible for overseeing implementation of permit responsibilities for the City. Presently, under the General Construction Stormwater Permit, projects greater than five acres are required to incorporate, to the maximum extent possible, permanent or post-construction BMPs in project planning and design. During project construction, a temporary alteration of the existing on-site drainage pattern may occur. However, these changes would not result in substantial erosion or siltation due to stringent controls imposed via NPDES, SWPP and SUSMP regulations as discussed under Section 9(a) above and through implementation of Mitigation Measure 9-1 below.

Furthermore, the project site is located in a highly urbanized area of Carson, and no streams or river courses are located on or within the project vicinity. The project site is largely undeveloped and most of the runoff ponds onsite, with limited flows to the local storm drain system during a storm event. The proposed project could increase the amount of impervious surface area on the project site through the development of the project building and surface parking lots. Since the proposed project includes an increase in the amount of new impervious areas, the proposed project could increase the amount of surface water runoff.

All runoff from the proposed project site during storm events would be directed to landscaped areas within the project site for treatment before discharging to the existing storm drain system and would not encounter unprotected soils. Therefore, the proposed project would not exceed capacity of the existing or planned storm water drainage systems or result in substantial erosion or siltation on- or off-site. Proposed project impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

d) 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 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. A project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

As noted, all the runoff associated with the proposed project would be directed to landscaped areas before discharge to the existing storm drain system. Therefore, the proposed project would not substantially alter the existing drainage pattern of the project area. Project impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

e) Would the project 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 With Mitigation. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the project site were to increase to a level which exceeds the capacity of the storm drain system serving the project site. A project-related significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

Construction-Related Project Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the proposed project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the SUSMP. These BMPs are outlined in greater detail in the following Mitigation Measures section. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Operation-Related Project Impacts

Activities associated with operation of the proposed project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars and trucks in the parking area and internal roadways could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the proposed project must comply with water quality standards and wastewater discharge BMPs set forth by the City of Carson and the SWRCB. Further, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the proposed project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for water quality impacts to a less than significant level. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Refer to Section 9(a) and 9(f) for a discussion of project impacts related to water quality.

Mitigation Measures

9-1 During construction, the Applicant shall implement all applicable and mandatory BMPs in accordance with the SUSMP and the City of Los Angeles Stormwater Management Program. These BMPs shall include, but not be limited, to the following:

- Erosion control procedures shall be implemented for exposed areas.
- Appropriate dust suppression techniques, such as watering or tarping, shall be used.
- Construction entrances shall be designed to facilitate removal of debris from vehicles exiting the site.

9-2 All construction equipment and vehicles shall be inspected for and leaks repaired according to a regular schedule, specified in the Grading Plan approved by the City.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality.

During construction, sediment is typically the constituent of greatest potential concern. The greatest risk of soil erosion during the construction phase occurs when site disturbance peaks due to grading activity and the removal and re-compaction or replacement of fill areas (sediment is not typically a constituent of concern during the long-term operation of developments similar to the proposed project because sites are usually paved, and proper drainage infrastructure has been installed). Other pollutants that could affect surface-water quality during project construction include petroleum products (gasoline, diesel, kerosene, oil, and grease), hydrocarbons from asphalt paving, paints and solvents, detergents, fertilizers, and pesticides (including insecticides, fungicides, herbicides, rodenticides, etc.).

Once the proposed project has been constructed, urban runoff might include all of the above contaminants, as well as trace metals from pavement runoff and landscape maintenance debris may be mobilized in wet-season storm runoff from roadway areas, parking areas, and landscaping, and in dry-season "nuisance flows" may result from landscape irrigation. Liquid product spills occurring at the project site could also enter the storm drain. Dry product spills could enter the storm drain via runoff in wet weather conditions or dry-season "nuisance flows." Runoff from the exposed portions of the proposed project's driveway would be intercepted by a filtered trench drain device before outletting to the street, while water from the building roof would be directed to a series of downspouts and routed through inline downspout filter devices, with NPDES planter devices utilized prior to discharge off-site. These BMPS are anticipated to treat storm water runoff and reduce the potential for impacts associated with the degradation of water quality. Therefore, the proposed project would not degrade water quality and impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact would occur if a project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood which results from a severe rainstorm with a probability of occurring approximately once every 100 years. The proposed project does not include housing. Therefore, the proposed project would not place housing within a 100-year flood hazard area

and no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if a project was located within a 100-year flood zone, which would impede or redirect flood flows.

According to the Federal Emergency Management Agency Flood Insurance Rate Map 06037C1795F, the project site is located within Zone X, area of minimal flooding. The proposed project is located in a highly urbanized area and would not have the potential to impede or redirect floodwater flows. No impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. A significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

The project site is not located within a potential inundation area. As such, no impact related to potential inundation from the failure of a levee or dam would occur. The project site is not located in the vicinity of a major water storage facility. As such, no impact related to inundation from failure of a water storage facility would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

The project site is located at least 9 miles from the Pacific Ocean and is not in the vicinity of any other major water bodies; therefore, risks associated with seiches or tsunamis would be considered extremely low at the project site. Furthermore, the project site is located in the highly urbanized area of Carson

where little open space exists. Therefore, the potential for mudflows to impact the project site would also be highly unlikely. Therefore, impacts would be less than significant with respect to risk of loss, injury, or death by seiche, tsunami, or mudflow. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed project in combination with the related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the project site and the surrounding area are served by the existing City storm drain system. Runoff from the project site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the future development projects in this area of the City would also drain to the surrounding street system. It is very likely that portions of the related project sites, similar to the project site, contain pervious surface area. Therefore, the development of the related projects and the proposed project would increase the amount of pervious surface area on the related project sites and there would be a cumulative increase the amount of surface water runoff.

Similar to the proposed project, all the runoff associated with the related projects would either be directed to landscaped areas or directed to an existing stormdrain system and would not encounter unprotected soils. The related projects would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain. Therefore, cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. In addition, all of the related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative water quality and flooding impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

10. LAND USE AND PLANNING

The General Plan EIR evaluated the following potential impacts with respect to land use:

- **Consistency with Relevant Federal and State Plans and Policies** – Implementation of the proposed General Plan may result in potential consistency impacts with Federal and State plans and policies.
- **Consistency with Relevant Regional Plans and Policies** – Implementation of the proposed General Plan may result in potential consistency impacts with policies in SCAG's Regional Comprehensive Plan and Guide.

- **Consistency with Relevant Local Plans and Policies** – Implementation of the proposed General Plan may result in potential consistency impacts with local plans and policies.
- **Land Use Compatibility** – Development associated with implementation of the proposed General Plan may result in direct impacts regarding land use compatibilities.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Consistency with Relevant Federal and State Plans and Policies** – Less Than Significant Impact.
- **Consistency with Relevant Regional Plans and Policies** – Less Than Significant Impact.
- **Consistency with Relevant Local Plans and Policies** – Less Than Significant Impact.
- **Land Use Compatibility** – Less Than Significant Impact.

a) Would the project physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project would be sufficiently large or otherwise configured in such a way as to create a physical barrier within an established community. Physically dividing elements may include land use incompatibility caused by contrasting scale or land use. The project area is currently developed primarily with industrial uses. The proposed project would be similar in height to numerous land uses in the immediate project vicinity. The following analysis outlines the proposed project's consistency with existing surrounding land uses with respect to land use function, scale, and intensity.

The project site is located in an urbanized setting and is surrounded by predominantly industrial uses, some commercial uses, and a mobile home park adjacent to the project site's western boundary. The mobile home park is located within an area of the City that is designated for industrial use in the City's General Plan and is considered to be a legal, non-conforming use.

The proposed project's two-story building would be consistent with the one- to two-story buildings in the immediate area. The building heights and massing that would be developed with the implementation of the proposed project would be compatible with the character of the surrounding area. Furthermore, the proposed project would consist of an industrial use that is similar to the existing industrial character of the surrounding area. As such, the proposed project would not cause a conflict of land use that would physically divide an existing community.

The proposed project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. Since the proposed project would be developed within a long-established urban area along an existing street system, the proposed project would not physically divide an established community by creating new streets or by blocking or changing

the existing street grid pattern. The project would not create a conflict of scale, intensity, or use that would serve as a physical division. Since the project would not physically disrupt or divide the surrounding established community, impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

At the local level, the Carson General Plan implements land use policies for the project site and vicinity. The City's zoning governs land use at the project site through development and building standards. At the regional level, the Southern California Association of Government (SCAG) has prepared a Regional Comprehensive Plan and Guide (RCPG) that is a framework for decision-making with respect to regional growth and through its Growth Management policies addresses land use within a broader context. The consistency of the proposed project with the applicable policies of each of the aforementioned plans is addressed in the following discussion of plan compliance.

Southern California Association of Government - Regional Comprehensive Plan and Guide

The RCPG of the SCAG is a framework for decision-making with respect to regional growth to year 2015 and beyond, including growth management and regional mobility. Adopted policies related to land use are contained primarily in Chapter 2, Growth Management, of the RCPG. The purpose of the Growth Management chapter is to present forecasts that establish expectations related to growth and land use. These forecasts encourage local land use actions that could ultimately lead to the development of an urban form that would help minimize development costs, protect natural resources, and enhance the quality of life in the region. The proposed project would be consistent with Growth Management policies of infill development, proximity to jobs, development in proximity to transportation, and development in a location that would result in fewer environmental consequences. Therefore, project impacts are less than significant with respect to the policies of the RCPG.

General Plan

The Carson General Plan was most recently updated in 2003. The General Plan and General Plan EIR were prepared to update the City's development projections to the year 2020, including projections for dwelling units, non-residential square footage, population and employment and evaluate the impacts of that development. Through the implementation of the goals and policies in the General Plan Update, the City works to provide a pleasant living and working environment for City residents and workers.

The updated General Plan Land Use Map originally considered by the City designated the project site for Business Park use. On October 5, 2004, in response to concerns with applying the Business Park designation, the City Council reviewed an alternative to retain the Light Industrial designation and include a policy within the Land Use Element that encourages non-truck intensive uses. As shown in the adopted Land Use Element, associated policies and implementation strategies were identified and the Land Use Map identifies this area for "Limited Truck Activity". The following are specific goals and objectives as they directly relate to limiting truck activity in the area of the project site:

LU-6.8: Manage Truck-Intensive Uses

LU-IM 6.8 Analyze the Zoning Ordinance for truck-intensive uses, determine how such uses may impact other land uses, traffic and truck routes, and make changes as necessary to the permitted uses and the review processes required. Such changes shall include a jobs and fiscal impact report to determine effects of the proposed changes to uses permitted and review processes required.

In March, 2011, the City Planning Commission voted to recommend approval of Zone Change Case No. 164-11 in order to add certain properties to the Design Overlay district through the zone change process and bring the zoning of these properties into consistency with the General Plan. This zone change, which applied to the project site among other properties, amended the existing zoning designation to be compatible with the General Plan policy regarding Limited Truck Activity Areas. The zone change added a Design Overlay ("D") designation to the project site zoning. The zone change received final approval from the Planning Commission in September 2011 and was adopted by the City Council in November, 2011.

The D designation requires discretionary review of new development within the zone. Discretionary review also provides a more comprehensive review of off-site improvements such as street trees, curbs, gutters and ADA-compliant sidewalks (adequate width, wheelchair accessible corners and driveways), undergrounding of utilities, streetlights and landscaping. The addition of a D overlay zone is intended to achieve better design standards and facilitate public discussion of the highest and best use for the

properties. By limiting truck intensive uses, the intent of the designation is to attract manufacturing, service and small- and mid-size businesses.

Accordingly, the General Plan designates the project site as Light Industrial, Limited Truck Activity. Under the General Plan, Light Industrial areas are intended to provide for small- and medium-sized industrial uses which are not likely to have adverse effects on adjacent properties. These uses are also intended to provide a buffer between residential and/or commercial land uses and other heavier industrial uses. The maximum allowable FAR is 0.5, although the average FAR ultimately expected to be built out for this land use is approximately 0.42.

The updated General Plan included development projections for the City through 2020. This anticipated growth in the City included 13,774,072 square feet of additional light industrial development that would be expected to occur in the appropriately designated areas of the City between 2000 and 2020.[16] Construction of the proposed project's 230,000 square foot light industrial/warehouse building would be within this projection. The proposed FAR of 0.45 would be within the maximum allowable 0.5 FAR for light industrial development.

The proposed project would include a light industrial/warehouse building and would be consistent with the Light Industrial designation in the General Plan. The building would be designed to accommodate two smaller tenants, consistent with the intent of the General Plan to accommodate small- and medium-sized businesses in areas designated Light Industrial. This configuration of the proposed project building would also implement the intent of the Limited Truck Activity overlay district. Through compliance with the Design Overlay Review process discussed below, the proposed project would be demonstrably consistent with the Limited Truck Activity designation.

The proposed project is located within an area of the City that is characterized by predominantly industrial uses. An exception is the mobile home park located to immediately to the west of the project site. This use has been identified as a legal non-conforming use by the City. The site containing the mobile home park was identified in the General Plan update and General Plan EIR as an area of proposed land use change.[17] This proposed change to the existing land use would remove the 81 mobile home units and replace with 86,000 square feet of light industrial use. However, even with the presence of the non-conforming use, the analysis presented in this Initial Study demonstrates that the proposed project would not significantly impact the mobile home park use.

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[16] *Carson General Plan Draft Environmental Impact Report, October, 2002, Table 3-5.*

[17] *Carson General Plan Draft Environmental Impact Report, October, 2002, Table 3-2, Study Area 12b.*

Zoning Code

The proposed project use would be consistent with the ML (light industrial) zoning classification that is applicable to the project site. The D Design Overlay designation requires that new development be subject to Carson Municipal Code (CMC) Section 9172.23, Site Plan and Design Review. This type of permit is commonly referred to as a Design Overlay Review (DOR). A DOR requires that a development plan be submitted and approved according to procedures contained in CMC Section 9172.23 before any grading permit, electrical permit, plumbing permit, or building permit is issued or sign installed which involves significant exterior changes in the opinion of the Planning Director. A development valuation exceeding $50,000 requires the development plan to be reviewed by the Planning Commission at a public hearing. As such, with the proposed land use application, the Applicant is seeking the following entitlements for the proposed project:

- Design Overlay Review

The proposed project would be consistent with the Limited Truck Overlay designation that resulting in the requirement for Design Overlay Review. The proposed project would be designed to accommodate smaller user, which would limit the associated truck activity. The proposed project has been designed with an efficient circulation system that would limit the effects of truck activity on off-site uses. As demonstrated in Section 16, Transportation/Traffic, of this Initial Study, proposed project traffic, including truck traffic, would not impact surrounding roadways or traffic conditions. As part of its approval of the Design Overlay Review application, the City is required to adopt specific findings that that the proposed project complies with the zoning code, is consistent with the General Plan and is or would be compatible with existing and future development on neighboring properties.

Following the granting of the above entitlements and based on the requisite findings, the proposed project would be in full compliance with the applicable land use polices of the City of Carson and project impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A project-related significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan.

As discussed in Section 4(f) above, no such plans presently exist which govern any portion of the project site. Furthermore, the project site is located in an area which is already fully developed with residential, commercial, and retail uses, and is also within a heavily urbanized area of the City of Carson. Therefore

the proposed project would not have the potential to cause such effects and there would be no impact. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

No Impact. Future development of projects within the City of Carson is expected to occur in accordance with adopted plans and regulations. It is also expected that future development would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, no cumulative land use impacts are anticipated. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

11. MINERAL RESOURCES

There are no substantial mineral resources or resource extraction activities located in the City of Carson. The General Plan EIR did not address potential impacts related to mineral resources.

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

No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if a project development would convert an existing or future regionally-important mineral extraction use to another use, or if a project development would affect access to a site used or potentially available for regionally-important mineral resource extraction.

The project site is undeveloped except for a vacant 8,000 square foot industrial building. No oil wells or mineral extraction activities are present on the project site or proximate to the project site. Therefore, no impacts would occur with implementation of the proposed project. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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. A significant impact may occur if a project site is located in an area used or available for extraction of a locally-important mineral resource delineated in a general plan or other land use plan.

The project site is not identified in the General Plan or zoned for oil extraction and drilling or mining of mineral resources, and there are no such operations at the project site. Therefore, development of the proposed project would not result in the loss of availability of a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Thus, no impact associated with mineral resources would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

No Impact. As discussed above, the proposed project would have no impact on mineral resources. Future development in the City would not be expected to result in the loss of availability of known mineral resources because no such activity presently occurs in the City. Regardless, because the proposed project would have no incremental contribution to the potential cumulative impact on mineral resources, the proposed project would have no cumulative impact on such resources. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

12. NOISE

The General Plan EIR evaluated the following potential impacts with respect to noise:

- **Construction Noise** – Development associated with implementation of the proposed General Plan would involve construction-related noise as future parcels are developed and/or renovated.
- **Traffic Noise** – Future traffic noise levels associated with implementation of the proposed General Plan may contribute to an exceedance of the City's noise standard resulting in potential noise impacts to sensitive receptors.
- **Aircraft Noise** – Future operation of the Long Beach Airport and Compton Airport may be a significant noise source to surrounding land uses.
- **Railroad Noise** – Future operation of railways would be a significant noise source to land uses located in Carson.
- **Stationary Noise** – Stationary noises within the City may impact adjacent land uses.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Construction Noise** – Less Than Significant Impact.
- **Traffic Noise** - Significant and Unavoidable Impact.

- **Aircraft Noise** – Less Than Significant Impact.
- **Railroad Noise** – Significant and Unavoidable Impact.
- **Stationary Noise** – Less Than Significant Impact.

Introduction

Fundamentals of Sound and Environmental Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway. Table IV-9 (Representative Environmental Noise Levels) illustrates representative noise levels for the environment.

Table IV-9
Representative Environmental Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock Band
Jet Fly-over at 100 feet		
	—100—	
Gas Lawnmower at 3 feet		
	—90—	
		Food Blender at 3 feet
Diesel Truck going 50 mph at 50 feet	—80—	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime		
Gas Lawnmower at 100 feet	—70—	Vacuum Cleaner at 10 feet
Commercial Area		Normal Speech at 3 feet

Table IV-9
Representative Environmental Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Heavy Traffic at 300 feet	—60—	
		Large Business Office
Quiet Urban Area during Daytime	—50—	Dishwasher in Next Room
Quiet Urban Area during Nighttime	—40—	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime		
	—30—	Library
Quiet Rural Area during Nighttime		Bedroom at Night, Concert Hall (background)
	—20—	
		Broadcast/Recording Studio
	—10—	
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing
Source: California Department of Transportation, 1998.		

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq} – The equivalent energy noise level is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- L_{min} – The minimum instantaneous noise level experienced during a given period of time.
- L_{max} – The maximum instantaneous noise level experienced during a given period of time.
- CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA penalty added to noise during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "penalty" added to noise during the hours of 10:00 p.m. to 7:00 a.m., to account for noise sensitivity in the evening

and nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 45 dBA, moderate in the 45–60 dBA range, and high above 60 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

Under controlled conditions, in an acoustics laboratory, the trained healthy human ear is able to discern changes in sound levels of 1 dBA, when exposed to steady, single frequency "pure tone" signals in the mid-frequency range. Outside of such controlled conditions, the trained ear can detect changes of 2 dBA in normal environmental noise. It is widely accepted that the average healthy ear, however, can barely perceive noise level changes of 3 dBA. Changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA increase is readily noticeable, while a difference of 10 dBA would be perceived as a doubling of loudness.

Noise levels from a particular source decline as distance to the receptor increases. Other factors, such as the weather and reflecting or shielding, also intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA. Noise from stationary or point sources (e.g. HVAC system and parked vehicles) is reduced by about 6 dBA for every doubling of distance. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 dBA with closed windows. The exterior-to-interior reduction of newer homes is generally 30 dBA or more with closed windows.

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact With Mitigation. A significant impact may occur if a project would not comply with the noise and land use compatibility standards of the City of Carson General Plan Noise Element or the Carson Municipal Code.

Construction Noise Impacts

Sections 4101(i) and 4101(j) of the Carson Municipal Code regulate noise from demolition and construction activities. These sections restrict non-emergency construction activity (including demolition) and repair work to the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday. No specific noise level thresholds have been adopted for construction noise sources.

Construction activities associated with the proposed project would only occur during the permitted hours designated in Sections 4101(i) and 4101(j) of the Municipal Code.

The City of Carson has also adopted a Noise Control Ordinance (Section 5500 et seq. of the Carson Municipal Code), which identifies noise standards for various sources, specific noise restrictions, exemptions, and variances for sources of noise within the city. For construction activities lasting more 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 not exceed 65 dBA between the hours of 7:00 a.m. and 8:00 p.m. daily except for Sundays and legal holidays, and 55 dBA between the hours of 8:00 p.m. and 7:00 a.m. on these same days. As discussed in the preceding discussion, construction activities would already be restricted to 7:00 a.m. and 6:00 p.m. Monday through Friday and the project applicant is requesting approval from the City to construction outside of these hours.

Construction activities associated with the proposed project would require the use of heavy equipment for demolition, site grading and excavation, and building construction. Noise from smaller power tools, generators, and other sources of noise would also be associated with construction of the proposed project. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the type and amount of equipment in operation and the location of the activity.

The maximum noise levels that would be expected to occur as a result of project demolition, excavation, and construction activities have been calculated for the residential uses located in close proximity to the project site. The calculated noise levels are shown in Table IV-10 (Maximum Hourly Noise Levels

Generated by Project Construction Activities). As shown, maximum hourly noise levels for all activities with the exception of the building construction would exceed 65 dBA L_{eq} at the adjacent mobile home park. As such, construction activities could exceed the City's noise ordinance standards at various times during the development of the proposed project.

Table IV-10
Maximum Hourly Noise Levels Generated by Project Construction Activities

	Hourly Construction Noise Levels in dBA L_{eq}				
Residential Receptor	**Demolition**	**Site Prep**	**Grading**	**Construction**	**Paving**
Mobile homes located to the west of the project site	73.7	76.2	78.6	62.9	79.0
Table Source: Cadence Environmental Consultants, 2011. Noise level calculation data are provided in Appendix E.					

Implementation of the mitigation measures set forth below as Mitigation Measures 12-1 through 12-5 would reduce the noise levels at the adjacent sensitive uses associated with construction activities and ensure that the proposed project would comply with the City of Carson Noise Control Ordinance. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Mitigation Measures

12-1 All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

12-2 Construction activities whose specific location on the project site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.

12-3 Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. Examples include the use of drills and jackhammers.

12-4 Two weeks prior to the commencement of construction at the project site, notification shall be provided to the manager of the mobile home park located immediately west of the project site disclosing the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. This notification shall also provide a contact name and phone number for residents to call for construction noise related complaints. All reasonable concerns shall be rectified within 24 hours of receipt.

12-5 The project developer shall install temporary, continuous, and impermeable sound curtains with a height of 12 feet along western perimeter of the project site where it abuts with the residential uses. The sound curtains shall be in place until the surface parking area in the western portion of the project site is complete.

Operational Noise Impacts

Based on Table N-2 (Noise and Land Use Compatibility Matrix) of the City of Carson General Plan Noise Element, the City of Carson allows new industrial buildings to be constructed where the average noise environment in outdoor activity areas is up to 75.0 dBA CNEL. Based on Table N-3 (Interior and Exterior Noise Standards) of the City of Carson General Plan Noise Element, interior noise levels within the proposed warehouse building due to outdoor sources must not exceed 65 dBA CNEL.

The City of Carson Noise Control Ordinance also addresses the noise levels that can be generated at one use and measured at an adjacent use. In the case of the proposed project, the operational activities at the project site cannot generally exceed 50 dBA L_{eq} at the nearby mobile home park during the daytime hours of 7:00 a.m. to 10:00 p.m. and 45 dBA L_{eq} during the nighttime hours of 10:00 p.m. to 7:00 a.m. The noise levels may be exceeded for short periods of time.[18]

Exhibit N-4 of the City of Carson General Plan Noise Element illustrates that the 70 dBA CNEL contour for Avalon Boulevard would occur within the roadway right-of-way. As such, noise levels at the project site due to roadway traffic would not approach the 75 dBA CNEL standard for industrial uses. Interior noise levels associated with traffic on Avalon Boulevard would be reduced by at least 30 dBA and these noise levels would not exceed the City's 65 dBA CNEL standard for industrial uses.

The project is proposed to operate between the hours of 6:00 a.m. and 8:00 p.m. The project would also include an eight-foot high concrete block wall along the western edge of the site to provide a buffer between the project and the adjacent residential uses. A detention basin will also be provided along the western edge of the property, which would further reduce the amount of truck activity that could occur in the western area of the project site and increase the setback distance of truck activity from the mobile home park use.

[18] *The identified noise standard is not to be exceeded for a cumulative period of more than 30 minutes in each hour. The noise standard is increased by 5 dBA, but the noise level may not exceed this by for a cumulative period of more than 15 minutes in each hour. The noise standard is increased by 10 dBA, but the noise level may not exceed this by for a cumulative period of more than 5 minutes in each hour. The noise standard is increased by 15 dBA, but the noise level may not exceed this by for a cumulative period of more than one minute in each hour. The noise standard may not be exceeded by 20 dBA for any amount of time.*

The noise level associated with peak hour truck movement has been calculated using the Federal Highway Administration (FHWA) Highway Noise Prediction Model (FHWA-RD-7-108). The resulting noise level at the mobile homes is calculated to average approximately 40.3 dBA L_{eq} during the peak traffic hour for the project (see Appendix E). This is actually lower than the 47.2 dBA L_{eq} ambient daytime noise level that was measured along the western boundary of the project site near the mobile homes (see Appendix E). The proposed block wall provides a calculated reduction of 6.3 dBA from the noise level that would otherwise occur wise occur at these homes (46.5 dBA L_{eq}).

The HVAC system that would be installed for the proposed project would consist of package units for the office pods and would typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. The warehouse portion of the project will have no HVAC system. However, as part of the proposed project, these HVAC units would be mounted on the rooftop of the proposed building over the office pod locations and would be screened from view by parapets and/or walls, as well as being provided with proper shielding to reduce noise levels. These units would be located at least 500 feet from the mobile home park. The shielding that would be installed around these systems would typically reduce noise levels by approximately 15 dBA. Thus, the noise levels from these HVAC systems could be reduced to between approximately 32 to 42 dBA L_{eq} at 50 feet from the equipment and would be reduced further at the adjacent receptor based on distance from the source.

Based on this information, the proposed project would comply with the applicable standards of the City of Carson General Plan Noise Element and the Noise Control Ordinance. Thus, operational noise impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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

Less Than Significant Impact. A significant impact may occur if a project were to generate excessive vibration during construction and/or operation.

Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as peak particle velocity (PPV) in inches per second. The general human response to different levels of groundborne vibration velocity levels is described in Table IV-11 (Human Response to Different Levels of Groundborne Vibration).

Table IV-11
Human Response to Different Levels of Groundborne Vibration

	Maximum PPV in Inches per Second	
Human Response	**Transient Sources**	**Continuous/Frequent Intermittent Sources**
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.9	0.10
Severe	2.0	0.4

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: California Department of Transportation, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.

Groundborne vibration levels that could induce potential damage to buildings are identified in Table IV-12 (Groundborne Vibration Damage Potential Criteria).

Table IV-12
Groundborne Vibration Damage Potential Criteria

	Maximum PPV in Inches per Second	
Structure and Condition	**Transient Sources**	**Continuous/Frequent Intermittent Sources**
Extremely Fragile Historic Buildings, Ruins, Ancient Monuments	0.12	0.08
Fragile Buildings	0.2	0.1
Historic and Some Old Buildings	0.5	0.25
Older Residential Structures	0.5	0.3
New Residential Structures	1.0	0.5
Modern Industrial/Commercial Buildings	2.0	0.5

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: California Department of Transportation, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.

Most perceptible indoor vibration is caused by sources within buildings such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of

perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible.

Aside from seismic events, the greatest regular source of groundborne vibration in the immediate vicinity of the project site is from roadway truck traffic.

The State CEQA Guidelines do not define the levels at which groundborne vibration or groundborne noise are considered "excessive." In addition, the City of Carson has not adopted any thresholds for groundborne vibration impacts. However, the California Department of Transportation (Caltrans) has adopted the vibration standards identified above in Tables IV-11 and IV-12 to evaluate potential impacts related to construction activities.

The buildings adjacent to the project consist of relatively modern manufactured housing and industrial buildings of more modern steel and concrete construction. Based on the criteria identified in Table IV-12, a significant structural groundborne vibration impact could occur if the adjacent residential and industrial buildings are exposed to vibration levels of 0.5 inches per second PPV. The potential for nearby residents and workers to be annoyed by groundborne vibration would be significant if vibration levels reach 0.10 inches per second PPV.

Construction-Related Groundborne Vibration Impacts

Demolition and construction activities that would occur at the project site may have the potential to generate low levels of groundborne vibration. Table IV-13 (Vibration Source Levels for Construction Equipment),[19] identifies various vibration velocity levels for construction equipment that may operate during construction of the proposed project.

Table IV-13
Vibration Source Levels for Construction Equipment

Construction Equipment	Reference PPV at 25 feet
Large Bulldozer	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003

[19] *These projected vibration levels represent the amount of construction-related vibration that would be experienced at 25 feet when equipment is operating at the property line of the affected sensitive receptor.*

Source: California Department of Transportation, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.

Based on the information presented in Table IV-13, vibration levels could reach as high as approximately 0.089 inches per second PPV within 25 feet of the project site from the operation of a large bulldozer. The maximum vibration level of 0.089 inches per second PPV would be below the thresholds of significance for both potential building damage and human annoyance. Therefore, the potential impacts associated with construction vibration would be less than significant.

Operational Groundborne Vibration Impacts

The source of groundborne vibration associated with the proposed project would be heavy trucks operating within the project site. As shown in Table IV-13, loaded heavy trucks could generate vibration levels of up to 0.076 PPV at a distance of 25 feet, which would be below the thresholds of significance for both potential building damage and human annoyance. Therefore, the operational impacts associated with groundborne vibration would be less than significant at nearby sensitive uses.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. A significant impact may occur if a project would introduce substantial new sources of noise or would substantially add to existing sources of noise within the vicinity of the project site during the operation of the project. The CEQA Guidelines also do not define the levels at which permanent increases in ambient noise are considered "substantial." As discussed previously in this section, a noise level increase of 3 dBA is barely perceptible to most people, a 5 dBA increase is readily noticeable, and a difference of 10 dBA would be perceived as a doubling of loudness. Based on this information, the following thresholds would apply to permanent increases in noise at sensitive receptors due to the operational characteristics of the project:

- Less than 3 dBA: not discernible: not significant.
- Between 3 dBA and 5 dBA: not significant if noise levels at sensitive receptors remain below 65 dBA CNEL; significant if the noise increase would meet or exceed 65 dBA CNEL.
- 5 dBA or greater: significant.

Existing uses within the vicinity of the project site would experience a slight permanent change in noise levels as a result of an increase in the on-site population and the resulting increase in motor vehicle trips. The proposed project is expected to result in an increase of approximately 1,009 vehicle trips per day. The changes in noise levels along the study-area roadway segments in the project vicinity are identified in Table IV-14 (Project Roadway Noise Impacts). As shown, the traffic generated by the

proposed project would increase local noise levels by a maximum of 0.1 dBA CNEL, which is inaudible/imperceptible to most people and would not exceed the threshold of significance. Therefore, this impact would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Table IV-14
Project Roadway Noise Impacts

Roadway	Roadway Segment	Noise Levels in dBA CNEL				
		Existing Traffic Volumes	Existing Plus Project	Increase	Significance Threshold	Significant Impact?
Avalon Boulevard	South of Gardena Blvd.	64.6	64.6	0.0	3.0	No
Alondra Boulevard	East of Avalon Blvd.	62.6	62.6	0.0	3.0	No
Gardena Boulevard	East of Main St.	58.2	58.3	0.1	3.0	No
Traffic Information Source: Hirsh/Green Transportation Consulting, November 2011.						
Table Source: Cadence Environmental Consultants, 2011. Noise level calculation data are provided in Appendix E.						

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact with Mitigation. The Noise Control Ordinance addresses the construction-related noise levels that are considered to be "substantial" and, therefore, significant by the City of Carson. As such, the evaluation of construction-related noise level in Checklist Question 12(a), above, is applicable to this impact evaluation.

Mitigation Measures

Mitigation Measures 12-1 through 12-5 identified above are applicable to this impact.

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 expose people residing or working in the project area to excessive noise levels?

No Impact. A significant impact would occur if the project site was located within the noise impact area of a public airport land use plan or within two miles of a public use airport and would expose students and people working in the project area to excessive noise levels from aircraft operations.

Although the project site is subject to occasional over flights from jet and propeller aircraft from the Compton-Woodley airport located approximately one mile northeast of the project site, it is not located within the noise impact area of a public airport land use plan. Therefore, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in a project area to excessive noise levels?

No impact. A significant impact may occur if a project were in the vicinity of a private airstrip and would project students and workers to excessive noise levels from aircraft operations.

The project site is not located within the vicinity of any private airstrip. Therefore, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Development of the proposed project in conjunction with future development in this area of the City would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized City of Carson. The project applicant has no control over the timing or sequencing of future development within the proposed project study area. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Construction-period noise for the proposed project and each future development project (that has not yet been built) would be localized. In addition, noise impacts are localized in nature and decrease substantially with distance. A potentially significant cumulative construction-related noise impact would only occur if the proposed project and another nearby project were to be constructed at the same time. The area around the project site is already developed and there are no other project proposed in proximity close enough to affect the same sensitive receptors (the mobile home park) as the proposed project. Therefore, the proposed project would not contribute to significant cumulative noise impacts related to construction.

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the difference between existing roadway noise levels and future noise levels with proposed project and cumulative development. The noise levels associated with existing traffic volumes and future traffic volumes with the proposed project are identified in Table IV-15 (Cumulative Project Noise Levels). As shown, the traffic generated by the proposed project and cumulative development would increase local noise levels by a maximum of 0.2

dBA CNEL, which is inaudible/imperceptible to most people and would not exceed the identified thresholds of significance. Therefore, this cumulative impact would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Table IV-15
Cumulative Roadway Noise Impacts

Roadway	Roadway Segment	Noise Levels in dBA CNEL				
		Existing Traffic Volumes	Future Plus Project	Increase	Significance Threshold	Significant Impact?
Avalon Boulevard	South of Gardena Blvd.	64.6	64.7	0.1	3.0	No
Alondra Boulevard	East of Avalon Blvd.	62.6	62.7	0.1	3.0	No
Gardena Boulevard	East of Main St.	58.2	58.4	0.2	3.0	No
Traffic Information Source: Hirsh/Green Transportation Consulting, November 2011.						
Table Source: Cadence Environmental Consultants, 2011. Noise level calculation data are provided in Appendix E.						

13. POPULATION AND HOUSING

The General Plan EIR evaluated the following potential impacts with respect to population, housing and employment:

- **Population Growth** – Population growth associated with implementation of the proposed General Plan may increase within the City through the planning Horizon year of 2020.
- **Housing Growth** – Implementation of the proposed General Plan would result in an additional 1,839 housing units for the City of Carson.
- **Employment Growth** – Employment growth associated with implementation of the proposed General Plan is anticipated to result in an increase in employment growth within the City.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Population Growth** – Less than Significant Impact.
- **Housing Growth** – Less Than Significant Impact.
- **Employment Growth** – Less Than Significant Impact.

a) Would the project induce substantial 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)?

Less Than Significant Impact. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

Population

No permanent employment would be generated as a result of the construction of the proposed project, as the proposed project would generate temporary construction-related jobs. In particular, most construction projects of this size and nature are completed in a timely manner and require specialized workers at various time frames, as needed. As a result, project-related construction workers are not likely to relocate to the area as a consequence of working on the proposed project. No permanent population would be associated with the proposed project, as it would provide an industrial use on the project site. The proposed project could induce population growth through the provision of permanent jobs, if employees chose to relocate to Carson for those jobs. Based on a nominal allocation of 1,000 square feet per employee, the proposed project could generate approximately 230 jobs, although the exact levels of employment would be dependent upon the type and operational characteristics of tenants locating within the project. The proposed project would be consistent with the General Plan projection of over 13 million square feet of light industrial development between 2000 and 2020. Any induced population growth associated with additional light industrial development would be reflected in the population projection for the General Plan. The proposed project would be consistent, then, with this projection. Because the proposed project would not cause population growth where it would otherwise not have occurred, impacts associated with population growth would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Housing

With respect to housing, the proposed project would not include housing. The proposed project would be consistent with the General Plan projection of over 13 million square feet of light industrial development between 2000 and 2020. Any induced housing growth associated with additional light industrial development would be reflected in the housing projection reflected in the General Plan. The proposed project would be consistent, then, with this projection. Because the proposed project would not cause housing growth where it would otherwise not have occurred, impacts associated with housing growth would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

The proposed project would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. Because the proposed project is consistent with the General Plan, it would not introduce unplanned infrastructure not previously evaluated in the General Plan.

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

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere.

Development of the proposed project would not result in the displacement any residential units since the project site is presently undeveloped except for a vacant industrial building. No impact related to housing displacement would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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

No Impact. A project-related significant adverse effect could occur if a project would result in the displacement of a substantial amount of people.

Development of the proposed project would not result in the displacement any residential units since the project site is presently undeveloped except for a vacant industrial building. No impact related to population displacement would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. The General Plan projections for development in the City of Carson between 2000 and 2020 is 1,839 housing units and 14,943,068 square feet of commercial, mixed use business park and industrial uses. This level of development is analyzed and evaluated in the General Plan EIR. The proposed project, in conjunction with future development in the City that is consistent with the General Plan would not result in cumulative impacts related to population and housing growth beyond those evaluated in the General Plan EIR. Therefore, cumulative impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

14. PUBLIC SERVICES

The General Plan EIR evaluated the following potential impacts with respect to public services:

- **Fire Protection** – Implementation of the proposed General Plan may result in the need for additional fire facilities or personnel.
- **Police Protection** – Implementation of the proposed General Plan may result kin the need for additional police facilities or personnel.
- **School Facilities** – Implementation of the proposed General Plan may result in the need for additional school facilities.
- **Library Facilities** – Implementation of the proposed General Plan may result in increased demand for library services and the need for additional library facilities within the City.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Fire Protection** – Less Than Significant Impact.
- **Police Protection** – Less Than Significant Impact.
- **School Facilities** - Significant and Unavoidable Impact.
- **Library Facilities** – Less Than Significant Impact.

Impact Analysis

Would a project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 objective for any of the following public services:

a) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. The City of Carson is served by the Los Angeles County Fire Department (LACoFD). The project site is within the service area of LACoFD Batallion 7, which covers the communities of Carson, Gardena and Compton. The proposed project would be served primarily by Fire Station No. 116, located at 755 East Victoria Street, approximately 1.2 miles south of the project site.

The General Plan EIR evaluated fire protection services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided and impacts would be less than significant. Since the proposed project would be consistent with the development projections for the

City, impacts related to fire protection services would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. The proposed project, in combination with projected development in the City, would increase the demand for fire protection services. Specifically, there would be increased demands for additional LACoFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding) to which the proposed project and future development would contribute. The General Plan EIR evaluated fire protection services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided. Cumulative impacts would therefore be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

b) Police protection?

Less Than Significant Impact. A significant impact may occur if the cognizant law enforcement agency could not adequately serve a project, necessitating a new or physically altered station. The City of Carson is served by the Los Angeles County Sheriff's Department (LASD). The project site is within the service area of the LASD Carson Station, which covers the City of Carson, and unincorporated County areas in Gardena, Torrance, and Rancho Dominguez. The proposed project would be served by the Carson station located at 21356 South Avalon Boulevard, approximately 3 miles south of the project site.

The General Plan EIR evaluated police protection services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided to serve this development and impacts would be less than significant. Since the proposed project would be consistent with the development projections for the City, impacts related to police protection services would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. The proposed project, in combination with projected development in the City, would increase the demand for police protection services. Specifically, there would be increased demands for additional LASD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding) to which the proposed project and future development would contribute. The General Plan EIR evaluated police protection services in the

City in light of development projected to occur by 2020 and concluded that sufficient services would be provided. Cumulative impacts would therefore be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

c) Schools?

Less Than Significant Impact With Mitigation. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the servicing school district.

The proposed project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs. The project site is currently served by Ambler Elementary School, Curtiss Middle School and Gardena High School.[20] In addition, the project area is served by the Ralph M. Bunche School in the Compton Unified School District (CUSD). The proposed project does not include residential development and will therefore not result in direct student generation.

The open enrollment policy is a State-mandated policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.[21]

Further, pursuant to the California Government Code Section 17620, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the proposed project's direct and indirect impacts on schools.

The General Plan EIR evaluated school services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided to serve this development and impacts would be less than significant. Since the proposed project would be consistent with the development projections for the City, impacts related to schools would be less than significant. The proposed project

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[20] *www.lausd.net, School Information Branch, School Finder for 16325 South Avalon Boulevard.*

[21] *News Release, Los Angeles Unified School District, Office of Communications, April 17, 2000.*

would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Mitigation Measure

14-1 The Applicant shall pay all required school fees to the LAUSD and/or CUSD.

Cumulative Impacts

Less Than Significant Impact With Mitigation. As a result of the development of the proposed project in combination with future development in the City, it is anticipated that a cumulative increase in the demand for school services would occur. It is likely that some of the students generated by future development would already reside in areas served by the LAUSD/CUSD and be enrolled in LAUSD/CUSD schools. However, for a conservative analysis, it is assumed that all the students indirectly generated by the proposed project and directly by future development would be new to the LAUSD/CUSD.

Additional schools are being constructed in the project area. However, there is no excess capacity to house the projected student enrollment and the construction of the new schools may not alleviate overcrowding. Therefore, to be conservative, it is concluded that the area schools that would serve the proposed project and future development would operate over capacities with cumulative student generation, and new or expanded schools could be needed. However, as mandated by state law, the Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees which a developer may be required to pay to mitigate a project's impact on school facilities. As such, the applicants of future development, in addition to the proposed project, would be required to pay a school fee to the LAUSD and/or CUSD to help reduce cumulative impacts on school services. Compliance with the provisions of SB 50 is deemed to provide full and complete mitigation of school facilities impacts. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools to less than significant levels. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

d) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project.

The proposed project does not include residential development and would therefore not result in increased permanent population and demand for park and recreation services in the City. The General Plan EIR evaluated park and recreation services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided to serve this development and impacts

would be less than significant. Since the proposed project would be consistent with the development projections for the City, impacts related to park and recreation services would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. As a result of the development of the proposed project in combination with future development in the City, it is anticipated that a cumulative increase in the demand for park and recreation services would occur. The General Plan EIR evaluated park and recreation services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided. Cumulative impacts would therefore be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve a project site.

The proposed project does not include residential development and would therefore not result in increased permanent population and demand for library services in the City. The General Plan EIR evaluated library services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided to serve this development and impacts would be less than significant. Since the proposed project would be consistent with the development projections for the City, impacts related to library services would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. As a result of the development of the proposed project in combination with future development in the City, it is anticipated that a cumulative increase in the demand for library services would occur. The General Plan EIR evaluated library services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided. Cumulative impacts would therefore be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

15. RECREATION

The General Plan EIR evaluated the following potential impacts with respect to parks, recreation and human services:

- **Parks, Recreation and Human Services** – Implementation of the proposed General Plan may result in significant impacts to the adequate availability of parkland and recreational facilities within the City.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Parks, Recreation and Human Services** – Less Than Significant Impact.

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?

Less Than Significant Impact. A significant impact may occur if a project would include substantial employment or population growth, which would 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.

The proposed project is a light industrial use that does not include permanent population growth and therefore would not result in substantial additional demand for park facilities in the City. Moreover, as numerous park facilities presently exist in the vicinity of the project site to serve the project residents and others in the area, impacts to parks and recreational facilities would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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?

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.

The proposed project is a light industrial use that does not include permanent population growth and therefore would not result in substantial additional demand for park facilities in the City. Implementation of the proposed project would not require construction or expansion of recreational

facilities. Project impacts to parks and recreational facilities would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

Less Than Significant Impact. As a result of the development of the proposed project in combination with future development in the City, it is anticipated that a cumulative increase in the demand for park and recreation services would occur. The General Plan EIR evaluated park and recreation services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided. Cumulative impacts would therefore be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

16. TRANSPORTATION/TRAFFIC

The General Plan EIR evaluated the following potential impacts with respect to transportation:

- **2020 Traffic Volumes/Roadway Capacities** – Implementation of the proposed General Plan would result in an increase in traffic volumes for the planning horizon year of 2020, which would impact the capacities of roadways within the City of Carson.
- **Consistency with CMP Standards** – Implementation of the proposed General Plan may result in the exceedance of LOS standards established by the CMP at Carson freeway monitoring locations.
- **Consistency with CMP, AQMP and RMP** – Implementation of the proposed General Plan may result in inconsistencies with the CMP, AQMP and RMP.
- **Alternative Transportation** – Implementation of the proposed General Plan may result in an incremental increase in demand for transit service and may enhance policies supporting alternative transportation.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **2020 Traffic Volumes/Roadway Capacities** – Significant and Unavoidable Impact.
- **Consistency with CMP Standards** - Significant and Unavoidable Impact.
- **Consistency with CMP, AQMP and RMP** – Less Than Significant Impact.
- **Alternative Transportation** – Less Than Significant Impact.

The following section summarizes and incorporates by reference the information provided in the Traffic Impact Analysis Report for the Proposed 230,000 Square Foot Industrial Warehouse Project Located at

16325 Avalon Boulevard in the City of Carson, California prepared by Hirsch/Green Transportation Consulting, Inc., in November 2011 (Traffic Report). The Traffic Report is provided as Appendix F to this Initial Study.

a) Would the project conflict with applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant Impact. A significant impact could occur if a project were to result in substantial increases in traffic volumes in the vicinity of a project site such that the existing street capacity experiences a decrease in the existing volume to capacity ratios, or experiences increased traffic congestion exceeding City of Carson's recommended level of service.

Construction Traffic Impacts

The proposed project would be constructed over approximately 10 months and would be completed in phases: demolition of the existing vacant 8,000 square foot structure, pad construction, and building construction and tenant improvements. The number of construction workers and construction equipment would vary throughout the construction process in order to maintain a reasonable schedule of completion. Construction workers would typically be on-site before 7:00 AM and would typically leave the project site prior to 5:00 PM. Therefore, construction worker traffic would occur before the morning and afternoon peak commute hours.

The conceptual grading plan for the project site indicates that the amount of cut and fill on the project site would be balanced and no export of soil would be required. Project-related traffic during the construction period would be limited to hauling of demolition debris from the existing structure, concrete trucks to pour the development pad, worker trips and materials deliveries. All of these activities would involve low levels of traffic general during peak hours that would be below the level of traffic generation associated with the project when operational. This level of traffic from construction activities is not expected to result in a significant traffic impact on the street system, given the available capacity of the roadway system as discussed in the operational traffic impact analysis below.

The anticipated haul route for demolition debris would be as follows: northbound on Avalon Boulevard, west on Gardena Boulevard to load, continue west on Gardena Boulevard, and then southbound on Main Street to access the Gardena Freeway.

Construction equipment and worker cars will be contained on-site. Traffic impacts associated with the construction activities will be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Operational Traffic Impacts

The Traffic Study utilized the Critical Movement Analysis ("CMA") methodology for the analysis and evaluation of traffic operations at signalized intersections, as detailed in Circular Number 212 published by the Transportation Research Board ("TRB").[22] This analysis technique describes the operating characteristics of an intersection in terms of the "Level of Service", based on intersection traffic volume and other variables such as number and type of signal phasing, lane geometries, and other factors which determine both the quantity of traffic that can move through an intersection ("Capacity") and the quality of that traffic flow ("Level of Service").

"Capacity" represents the maximum total hourly volume of vehicles in the critical lanes which has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. Critical lanes are defined generally as those intersection movement or groups of movements which exhibit the highest "per lane" volumes, thus defining the maximum amount of vehicles attempting to negotiate through the intersection during a specific time period. The capacity of an intersection also varies based on the number of signal phases for the location; more signal phases generally result in more "lost" or "start up" time, as vehicles exhibit slight driver reaction delays when signal indications change from "red" to "green". Additional signal phases introduce more signal indication changes, creating more opportunities for lost time during the signal cycle, and reducing the efficiency and thus the capacity of an intersection.

For the CMA methodology, the intersection capacities for various levels of service are based on the number of traffic signal phases, as shown in Table IV-16. For the intersection evaluation and transportation planning purposes of this traffic study, the CMA methodology typically equates the maximum "baseline" capacity of an intersection to the value of Level of Service ("LOS") E shown in Table IV-17. This value represents the highest volume of traffic that can be adequately accommodated through urban area intersections without a breakdown in operations, resulting in unstable traffic flows, high levels of congestion, and long delays.

The "Critical Movement" indices at an intersection are determined by first identifying the sum of the critical lane traffic volumes at the intersection. This traffic *volume* value, which represents the total

[22] *Interim Materials on Highway Capacity, Circular Number 212, Transportation Research Board, Washington, D.C., 1980.*

traffic volumes traveling through the most critical intersection movements for each of the intersection's approaches, is then divided by the appropriate intersection *capacity* value (from Table IV-16) for the type of signal control at the intersection, to determine the "CMA value" for the intersection, which is roughly equivalent to its volume-to-capacity ratio.

Table IV-16
Critical Movement Analysis (CMA) Volume Ranges per Level of Service

Level of Service	Maximum Sum of Critical Volumes (VPH) vs. Number of Signal Phases		
	Two Phases	**Three Phases**	**Four or More Phases**
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,225
F	----------Not Applicable----------		

* *For planning applications only. Not appropriate for operations/design.*
Source: Hirsch/Green Transportation Consulting, Inc., 2011

"Level of Service" ("LOS") describes the quality of traffic flow through the intersection. LOS A through LOS C exhibit good traffic flow characteristics, with little congestion. LOS D is typically the level for which metropolitan area street systems are designed, and represents the highest level of acceptable congestion and delay. LOS E defines conditions at or near the capacity of an intersection, and is characterized by short-duration stoppages and unstable traffic flows at its upper range. LOS F occurs when a facility is overloaded, and is characterized by stop-and-go traffic with long duration delays. Note that the LOS definitions do not represent a single operating condition, but rather correspond to a range of CMA values, as shown in Table IV-17.

Table IV-17
Level of Service as a Function of CMA Value

CMA Value	LOS	Intersection Operation/Traffic Flow Characteristics
$\leq$ 0.600	A	No congestion; all vehicles clear in a single cycle.
> 0.600 $\leq$ 0.700	B	Minimal congestion; all vehicles still clear in a single cycle.
> 0.700 $\leq$ 0.800	C	No major congestion; most vehicles clear in a single cycle.
> 0.800 $\leq$ 0.900	D	Generally uncongested, but vehicles may wait through more than one cycle; short duration queues may

		form on critical approaches.
> 0.900 ≤ 1.000	E	Increased congestion on critical approaches; long duration queues form at higher end of range.
> 1.000	F	Over capacity; forced flow with long periods of congestion; substantial queues form.

The Traffic Study was conducted to study the potential impacts of the proposed development on the operations of the streets and intersections surrounding the project site. The scope of the study was reviewed by the City's traffic engineer to ensure that appropriate analysis methodologies and assumptions were utilized. Based on those scoping discussions and City recommendations, the Traffic Study evaluated the existing (year 2011) and forecast future (year 2013) conditions at five signalized intersections adjacent to or in close proximity to the project site during typical weekday AM peak hour (corresponding to the highest one-hour traffic volume period between 7:00 and 10:00 AM) and PM peak hour (between 3:00 and 6:00 PM) commute traffic periods.

The five study intersections selected for this analysis, listed below, represent those intersections providing either direct access to the project site, or located along travel routes used to access the nearby Harbor (US-110) Freeway or Artesia/Gardena (SR-91) Freeway, and are the intersections most likely to be affected by new traffic generated by the proposed project.

1. Avalon Boulevard and Alondra Boulevard
2. Main Street and Gardena Boulevard
3. Avalon Boulevard and Gardena Boulevard
4. Avalon Boulevard and SR-91 Freeway Westbound On/Off-Ramps/Artesia Boulevard
5. Avalon Boulevard and Albertoni Street/SR-91 Freeway Eastbound On/Off-Ramps

Existing (2011) Traffic Volumes

Current traffic volumes for the five intersections analyzed in this report were obtained from counts performed specifically for this study in late October, 2011. The traffic count data represent typical mid-week conditions during weeks with no holidays or other special events, and with area businesses and schools generally in normal operation. The "peak hour" volumes described in this analysis reflect the highest four consecutive 15-minute periods within a larger three-hour count windows; peak hour traffic volumes were determined individually for each of the study intersections, assuring that the "worst case" operational conditions at each location were analyzed in this study.

An analysis of existing weekday AM and PM peak-hour traffic conditions was performed at the 8 study intersections. The CMA value and the corresponding LOS for existing (2011) traffic conditions were calculated, as shown in Table IV-18. These values provide the baseline for the analysis of project

impacts as described below. As shown in Table IV-18, acceptable Levels of Service (LOS A to LOS C) have been determined for all of the study intersections.

Table IV-18
Critical Movement Analysis Summary
Existing (2011) Conditions

Int. No.	Intersection	Peak Hour	Existing (2011)	
			CMA	LOS
1	Avalon Boulevard & Alondra Boulevard	AM	0.550	A
		PM	0.620	B
2	Main Street & Gardena Boulevard	AM	0.279	A
		PM	0.365	A
3	Avalon Boulevard & Gardena Boulevard	AM	0.445	A
		PM	0.420	A
4	Avalon Boulevard & SR-91 WB Off-Ramp/Artesia Boulevard	AM	0.499	A
		PM	0.444	A
5	Avalon Boulevard & Albertoni Street/SR-91 EB Ramps	AM	0.635	B
		PM	0.784	C
Source: Hirsch-Green Transportation Consulting, Inc., 2011				

Trip Generation

The traffic-generating characteristics of a variety of land uses, including industrial "warehouse" developments such as the one proposed, have been extensively surveyed and documented in studies conducted under the auspices of the Institute of Transportation Engineers ("ITE"), with the most recent information provided in the 8th Edition of ITE's *Trip Generation* manual.[23] The trip generation data contained in the ITE manual are nationally recognized, and are used as the basis for most traffic studies conducted throughout the Southern California region, including the City of Carson. The City's traffic engineer concurred with the use of the ITE data in the preparation of the Traffic Study.

While specific tenants for the proposed project have not been identified at this time, based on the anticipated use and operations of the proposed project, and discussions with the City of Carson traffic engineer, the ITE "warehouse" land use was determined to be most appropriate for estimation of the project's trip generation characteristics. This assumption is expected to produce a conservatively high estimate of the project's potential trip generation, since the "warehouse" trip generation rates provided in the ITE *Trip Generation* publication are based on the total square footage of the development, rather than on a more appropriate indicator of site activity, such as the number of truck loading docks.

[23] *Trip Generation, 8th Edition, Institute of Transportation Engineers, Washington, D.C., 2008.*

The ITE *Trip Generation* manual identifies both "average rates" and "fitted equations" for use in estimating the trip generation potential for "warehouse" uses. However, a review of the ITE data found that the average size of the warehouse facilities surveyed to develop the trip generation rates and equations contained in the ITE publication is approximately twice the size of the proposed project. Since most land uses, including warehouse uses, tend to generate fewer trips per unit of area as they increase in size, the larger sizes of the surveyed warehouses could skew the average trip generation rate data toward these lower "per unit" trip generating characteristics, and as such, use of the "average rates" could potentially underestimate the amount of traffic generated by the project. Therefore, for purposes of this study, in order to provide a conservative assessment of the potential trip generation and associated traffic impacts of the proposed project, the ITE "fitted equations" were used, as shown in Table IV-19.

Table IV-19
Project Trip Generation Rates

Warehousing-per 1,000 gross square feet of floor area (ITE Land Use 150)	
Daily Trips	Ln(T) = 0.86 Ln(A) +2.24
AM Peak Hour	Ln(T) = 0.55 Ln(A) + 1.88; I/B=79%, O/B=21%
PM Peak Hour	Ln(T) = 0.64 Ln(A) + 1.14; I/B=25%, O/B=75%
Notes: T=Trip Ends; A=Building Area in 1,000 sq.ft.; I/B=Inbound Trip Percentage; O/B=Outbound Trip Percentage. *Source: Trip Generation, 8th Edition, Institute of Transportation Engineers, Washington D.C., 2008.*	

Due to the type of development proposed (a warehousing facility containing truck docks), it is anticipated that single-unit and semi-trailer trucks will enter and exit the site on a daily basis. While the ITE trip generation equations shown in Table IV-19 can be used to estimate the total number of daily and peak hour vehicle trips resulting from development of the project, these rates do not account for the effects on traffic flows of larger single unit and semi-trucks, which occupy more space on the roadway than typical passenger vehicles, and can produce more disruptive traffic effects than typical automobiles or light trucks. Therefore, in order to accurately assess the project's potential for traffic impacts, it was necessary to estimate the amount of heavy truck traffic occurring at the site.

The ITE data indicates that approximately 20 percent of the total vehicular traffic generated by "warehouse" uses (on both a daily and peak hour basis) is due to truck trips. Therefore, for purposes of the analysis of the potential effects of the proposed project on traffic conditions at the five study intersections, it was assumed that 80 percent of the total daily and peak hour traffic generated by the proposed project would be due to typical passenger (automobiles and light-duty pickups, etc.) vehicles, which by definition, exhibit a passenger car equivalency factor ("PCE") of 1.0. However, as described above, the remaining 20 percent of the project's trips would be single-unit trucks or larger semi-trailer trucks, which are generally assumed to exhibit a PCE factor of 2.0, meaning that they produce traffic-influencing effects due to length, width, and other operational characteristics

(acceleration/deceleration, turning radii, etc.) equivalent to approximately twice that of typical automobiles or other passenger vehicles.

Based on these assumptions, the number of "total" (actual vehicle) trips generated by the proposed project was calculated; these values were then broken down into passenger vehicle trips and truck trips (adjusted using the "passenger car equivalency" factor described above). The total "passenger car equivalent" trips were used to evaluate the project's potential traffic impacts at the study intersections. The results are summarized in Table IV-20.

Table IV-20
Project Trip Generation

Size/Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Proposed Use							
230,000 sq.ft. Warehouse (total trips – unadjusted)	1,009	103	27	130	25	77	102
Passenger Car Equivalents							
Automobile Trips (80% of total; PCE =1.0)	807	82	22	104	20	62	82
Truck Trips (20% of total; PCE = 2.0)	404	41	11	52	10	30	40
Total New Project Trips	**1,211**	**123**	**33**	**156**	**30**	**92**	**122**
Source: Hirsch/Green Transportation Consulting, Inc., 2011							

As shown in Table IV-20, at full occupancy, the proposed project is expected to result in a total of approximately 1,009 new daily vehicle trips, including about 130 trips during the AM peak hour and 102 trips during the PM peak hour. These values reflect the actual number of vehicles anticipated to enter and exit the project site, including both passenger vehicles and trucks. However, in order to account for the more "impactful" effects of the truck traffic associated with the proposed project on the area streets and intersections, the number of truck-related trips was adjusted using the 2.0 PCE factor described earlier, essentially doubling the number of truck trips as a means of estimating the actual operational impacts of these large vehicles on the area roadway network. Therefore, for purposes of this analysis, the project is anticipated to generate a total of approximately 1,211 daily passenger car equivalent trips, including a total of approximately 156 PCE trips during the AM peak hour (123 inbound and 33 outbound) and approximately 122 PCE trips during the PM peak hour (30 inbound and 62 outbound), or approximately 20 percent more traffic than without the PCE adjustments. This higher number of trips was used as the basis for evaluating the project's potential impacts on the surrounding roadway network.

Trip Distribution

The general geographic distribution of project trips through the local study area as well as the surrounding region was identified for both the passenger vehicle trips and, separately, for the truck-related trips. These area-wide distributions were based primarily on the relative distribution of the population from which employees of the proposed project would be drawn, and from the anticipated origins and destinations of the truck-related trips, although existing traffic patterns in the project area were also reviewed. The resulting general geographic distribution of project-related trips, by vehicle type, is summarized in Table IV-21.

Table IV-21
Geographic Project Trip Distribution Percentages

	Passenger Vehicles			Trucks		
Direction	**Street**	**Freeway**	**Total**	**Street**	**Freeway**	**Total**
North	15%	10%	25%	10%	25%	35%
South	15%	5%	20%	5%	25%	30%
East	25%	10%	35%	5%	20%	25%
West	10%	10%	20%	5%	5%	10%
Total	**65%**	**35%**	**100%**	**25%**	**75%**	**100%**
Source: Hirsch/Green Transportation Consulting, Inc., 2011						

Trip Assignment

The directional distribution percentages shown in Table IV-21 were then disaggregated and assigned to specific routes and intersections within the study area that are expected to be used to access the project.

Significant Traffic Impact Criteria

The City of Carson defines a significant traffic impact attributable to a project as an increase in an intersection's CMA value, due to project-related traffic, of 0.020 or more when the final ("With Project") Level of Service is E or F. No significant impacts are deemed to occur at intersections exhibiting LOS A through LOS D, as these operating conditions exhibit sufficient surplus capacities to accommodate traffic increases with little effect on traffic operations or vehicle delays.

Existing (2011) With Project Conditions – Project Traffic Impacts

Traffic volumes generated by the proposed project were added to the Existing (2011) volumes to form the "Existing With Project" intersection volumes. These volumes were used to determine traffic impacts directly attributable to the proposed project. As shown in Table IV-22, while development of the proposed project and the addition of its associated traffic is expected to result in incremental increases

in the CMA values at each of the study intersections to varying degrees, these incremental increases would be relatively minor and would not change the current operating conditions (LOS) at any of the study intersections during either the AM or PM peak hours. Because none of the intersections would operate at LOS E or F with the addition of project traffic, none of the study intersections would be significantly impacted by project traffic, per the City of Carson's significance threshold.

Table IV-22
Critical Movement Analysis Summary
Project Traffic Impacts

Int. No.	Intersection	Peak Hour	Existing (2011)		Existing Plus Project (2011)		
			CMA	LOS	CMA	LOS	Impact
1	Avalon Boulevard & Alondra Boulevard	AM	0.550	A	0.559	A	0.009
		PM	0.620	B	0.638	B	0.018
2	Main Street & Gardena Boulevard	AM	0.279	A	0.281	A	0.002
		PM	0.365	A	0.371	A	0.006
3	Avalon Boulevard & Gardena Boulevard	AM	0.445	A	0.466	A	0.021
		PM	0.420	A	0.434	A	0.014
4	Avalon Boulevard & SR-91 WB Off-Ramp/Artesia Boulevard	AM	0.499	A	0.509	A	0.010
		PM	0.444	A	0.452	A	0.008
5	Avalon Boulevard & Albertoni Street/SR-91 EB Ramps	AM	0.635	B	0.641	B	0.006
		PM	0.784	C	0.793	C	0.009
Source: Hirsch/Green Transportation Consulting, Inc., 2011							

Future (2013) Without and With Project Conditions – Cumulative Traffic Impacts

The Traffic Study also evaluated the cumulative effects of proposed project traffic on the forecast future conditions in the area, with the future study year reflecting the date when the project is expected to be completed, fully occupied and operational. For purposes of this study, the project developer has identified that the project is expected to be completed and operational by the end of 2013, which was therefore assumed as the future study year for this analysis. This cumulative traffic analysis identifies the effects of anticipated future traffic growth on area traffic operations, which may be exacerbated by development of the proposed project.

The methodology for estimating future traffic volumes was as follows: First, the existing (2011) traffic volumes were determined by traffic counts. These existing volumes were then used to estimate future conditions (year 2013) through the application of an "ambient traffic growth factor". This growth factor, compounded annually, was applied to all of the turning movement volumes at the study intersections to form the benchmark traffic volume conditions for the future study year 2013. Although the annual growth factor is expected to fully represent all potential area traffic increases, for the purposes of

conservative analysis, traffic generated from other nearby development projects was also evaluated for possible inclusion in the estimates of the future "Without Project" traffic conditions.

Ambient Traffic Growth

Based on traffic growth trends in the City of Carson and the surrounding project vicinity area over the last several years, the City's traffic engineer determined that an annual traffic growth factor of approximately 1.0 percent, inclusive of both general ambient growth and traffic from cumulative area development, was appropriate for use in the Traffic Study. This annual "ambient traffic growth factor" was used to account for expected increases in traffic resulting from general traffic growth in the study vicinity due to ongoing regional population growth, or from potential development projects not yet proposed or outside of the study area. Therefore, the ambient traffic growth factor, compounded annually, was applied to the existing 2011 traffic volumes to develop the traffic volume estimates for the future year 2013 cumulative traffic conditions.

Related Projects

In addition to the 1.0 percent annual ambient traffic growth rate, a review of other proposed or ongoing development projects located within the study area, defined as an approximately 1-mile radius from the project site, was conducted to determine whether any other nearby projects would be completed within the study timeframe which could add traffic to any or all of the selected study intersections. However, based on information provided by the City's traffic engineer, there are no such "related project" developments located within the study area that would be expected to be completed by the year 2013. As such, no additional traffic beyond the assumed 1.0 percent annual ambient traffic growth factor described above is anticipated, and the annual ambient traffic growth factor was assumed to fully reflect all anticipated area traffic growth within the study period, including traffic due to any as-yet unidentified projects.

Finally, the net project AM and PM peak hour traffic volumes were combined with the forecast future "Without Project" volumes to produce the "Future (2013) With Project" traffic volume estimates, representing the anticipated cumulative traffic volumes at each of the five study intersections following the development and occupancy of the proposed project. These future year (2013) "Without Project" and "With Project" traffic volume forecasts were used to identify the incremental traffic impacts attributable to the development of the proposed project at the time of its expected completion and occupancy, as described in detail in the next section of this report.

The analysis of future traffic conditions at the study intersections was performed using the same analysis procedures described previously. For the analysis of future project traffic impacts, the current roadway system's geometric and signal operation characteristics were assumed to remain.

The results of the analysis of future traffic conditions at the study intersections are summarized in Table IV-23. Each of the five study locations are forecast to continue to exhibit acceptable LOS D or better operations during both the AM and PM peak hours under the anticipated future "Without Project" scenario. Under the future "With Project" scenario, the addition of project traffic would result in only nominal increases in the forecast future (year 2013) CMA values at each of the five study intersections, and with one exception, would not be expected to result in any changes in the forecast future levels of service. During the PM peak hour, the project's incremental traffic additions could result in a change in the level of service at the intersection of Avalon Boulevard and Albertoni Street/SR-91 Freeway Eastbound Ramps from LOS C to LOS D, although this intersection would continue to exhibit acceptable operating conditions (LOS D or better) under the "Future (2013) With Project" scenario. Because none of the intersections would operate at LOS E or F with the addition of project traffic, none of the study intersections would be significantly impacted by project traffic, per the City of Carson's significance threshold.

Table IV-23
Critical Movement Analysis Summary
Cumulative Traffic Impacts

Int. No.	Intersection	Peak Hour	Without Project (2013)		With Project (2013)		
			CMA	LOS	CMA	LOS	Impact
1	Avalon Boulevard & Alondra Boulevard	AM	0.561	A	0.570	A	0.009
		PM	0.633	B	0.641	B	0.008
2	Main Street & Gardena Boulevard	AM	0.284	A	0.287	A	0.003
		PM	0.373	A	0.379	A	0.006
3	Avalon Boulevard & Gardena Boulevard	AM	0.455	A	0.476	A	0.021
		PM	0.429	A	0.442	A	0.013
4	Avalon Boulevard & SR-91 WB Off-Ramp/Artesia Boulevard	AM	0.509	A	0.519	A	0.010
		PM	0.453	A	0.460	A	0.007
5	Avalon Boulevard & Albertoni Street/SR-91 EB Ramps	AM	0.648	B	0.655	B	0.007
		PM	0.799	C	0.809	D	0.010
Source: Hirsch/Green Transportation Consulting, Inc., 2011							

In summary, the development of the proposed project would not result in significant project-related or cumulative traffic impacts at any of the five study intersections. No mitigation measures are required. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. The Congestion Management Program (CMP) was enacted by Proposition 111 in 1990 with the intent of providing the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by the Metropolitan Transportation Authority (MTA), the local CMP agency, designating a highway network that includes all state highways and principal arterials within the County and monitoring the network's LOS to implement the statutory requirements of the CMP. This monitoring of the CMP network is one of the responsibilities of local jurisdictions. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the countywide plan.

The current (2010) CMP identifies only one arterial monitoring intersection within a two-mile radius of the project site, Artesia Boulevard and Vermont Avenue, although this intersection is located outside the study area, and is expected to be beyond the range of potential project traffic impacts, especially considering that none of the project-proximate study intersections examined in detail in the preceding analyses will be significantly impacted.

CMP Intersection Impacts

The CMP requires that detailed analyses be conducted for any location where the proposed project is anticipated to add 50 or more total trips (sum of all directions) during either the AM or PM peak hours of a typical weekday. Based on a review of the project's anticipated geographic trip distributions, approximately 10 percent of the project's passenger vehicle trips, and approximately five percent of its truck trips, are anticipated to travel to and from the west of the study area via Artesia Boulevard and/or the Artesia/Gardena Freeway, and would be expected to pass through the subject CMP arterial monitoring intersection.

As shown previously in Table IV-20, the proposed project is expected to generate approximately 104 passenger vehicle trips (82 inbound and 22 outbound) and 52 PCE truck trips (41 inbound and 11 outbound) during the AM peak hour, as well as approximately 82 passenger vehicle trips (20 inbound and 62 outbound) and 40 PCE truck trips (10 inbound and 30 outbound) during the PM peak hour. Therefore, using the appropriate traffic component distribution percentages, the project would potentially add approximately eight inbound (eastbound) passenger vehicle trips (82 inbound trips times 10 percent) and two inbound PCE truck trips (41 inbound trips times five percent) through the intersection of Artesia Boulevard and Vermont Avenue, plus an additional two outbound (westbound) passenger vehicle trips (22 outbound trips times 10 percent) and one outbound PCE truck trip (11 outbound trips times five percent, rounded up to the nearest whole number) during the AM peak hour,

for a total project-related traffic increase at this intersection of approximately 13 PCE trips during this time period.

Similarly, during the PM peak hour, the proposed project could be anticipated to add a maximum of approximately two inbound (eastbound) passenger vehicle trips (20 inbound trips times 10 percent) and one inbound PCE truck trip (10 inbound trips times five percent, rounded up to the nearest whole number), plus six additional outbound (westbound) passenger vehicle trips (62 outbound trips times 10 percent) and two outbound PCE truck trips (30 outbound trips times five percent, rounded up), or a total of approximately 11 PCE project-related trips traveling through the CMP arterial monitoring intersection of Artesia Boulevard and Vermont Avenue.

Therefore, the total project-related trip additions at the only CMP arterial monitoring intersection in the project vicinity would be the CMP's minimum 50-trip threshold during the typical weekday AM and PM peak hours. As a result, no significant impacts are anticipated at this intersection, and no further analysis is warranted.

CMP Freeway Segment Impacts

An examination was also made of the potential for project-related freeway impacts within the project study area. As described earlier, the CMP requires a detailed impact analysis of freeway mainline segments where a project could increase weekday peak hour traffic by 150 or more vehicles per hour in either direction. As shown in Table IV-20, the project is expected to generate fewer than 150 net new directional trips during both peak hours, with a maximum of 123 inbound PCE trips during the AM peak hour and a maximum of 92 outbound PCE trips during the PM peak hour. As a result, even if all of this traffic were assigned to the area freeways, the project's incremental trip additions will be less than the CMP's 150-trip threshold.

However, only a fraction of the project's trips are expected to use either the Harbor Freeway or Artesia/Gardena Freeway as travel routes, with a maximum of approximately 10 percent of the passenger vehicle trips (Harbor Freeway north of Redondo Beach Boulevard, and Artesia/Gardena Freeway west of Avalon Boulevard) and a maximum of approximately 25 percent of the truck trips (Harbor Freeway, both north and south of the project vicinity). As a result, the net directional peak hour project trip additions to any segment of either of these regional transportation facilities would be expected to be fewer than 25 vehicles during either peak hour. These nominal potential project traffic additions are substantially below the CMP's 150-trip threshold for detailed analyses, and are not expected to produce any measurable effects on any of the regional transportation facilities. Therefore, no further analysis of project-related traffic impacts to the area freeways is warranted.

Impacts related to CMP consistency would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to a project only if it involved an aviation-related use or would influence changes to existing flight paths.

The project does not include any aviation-related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in the Los Angeles Basin. Therefore, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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

Less Than Significant Impact. A significant impact may occur if a project included new roadway design or introduced a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions.

The project's on-site parking areas will be accessed by a total of four driveways, including three driveways along Avalon Boulevard, one each located near the northern and southern boundaries of the site and a third located about 2/3^{rds} of the way south along the project frontage (approximately opposite the existing break in the raised median island on Avalon Boulevard), and an additional driveway located along Gardena Boulevard south of the site and accessed via a narrow flag lot connecting to the main portion of the site near its western edge.

Although each of these driveways provides access to both on-site passenger vehicle parking spaces and truck loading/parking spaces, several driveway and internal traffic operational restrictions are proposed due to physical constraints evident in both the project site layout and on the adjacent streets (Avalon Boulevard and Gardena Boulevard). First, due to the presence of the existing raised median island on Avalon Boulevard adjacent to the site, both the northern and southern project driveways will be restricted to right-turn entry/right-turn exit only operations, although the "middle" Avalon Boulevard driveway, located opposite a break in the median island (which also provides dedicated northbound and southbound left-turn pockets), is anticipated to provide "full" access, including left-turn and right-turn

moves into and out of the project site; similarly, the Gardena Boulevard driveway, which does not exhibit any physical or operational access obstructions, will also operate as a full-access driveway.

However, the proposed design of the "middle" Avalon Boulevard driveway will not provide either sufficient driveway width or drive aisle maneuvering space to accommodate either inbound or outbound semi-trailer truck traffic, and as such, truck usage of this driveway will be prohibited. Further, to maximize the efficiency of the on-site traffic flows, truck circulation along the northern and southern drive aisles will be restricted to westbound-only (entering truck trips) for the north drive aisle, and eastbound-only (exiting truck trips) for the southern drive aisle; truck movements along the western side of the project site (to and from the truck docks) and through the flag lot access road, however, will provide two-way circulation (see Figures III-7 and III-8 in Section III, Project Description, of this Initial Study).

The proposed truck access operations were examined in detail, to assure that adequate maneuvering room for trucks into and out of the truck dock locations is provided, and that the project's driveways and drive aisles are wide enough to accommodate large trucks. Semi-truck entry to the site at the northernmost Avalon Boulevard driveway, and subsequent access through the site to the truck loading docks along the west side of the building, will operate acceptably, as will semi-truck exit movements through the southern on-site drive aisle and onto Avalon Boulevard from the southernmost driveway along that frontage, as well as to and from the two-way driveway along Gardena Boulevard. Therefore, no significant site access or internal vehicular circulation impacts are anticipated.

Finally, the overall operations of the project's driveways were examined, to assure that adequate capacity is provided to accommodate the anticipated vehicular access demands of the project. The total traffic volumes at each of the project's driveways were determined using the project traffic assignment percentages discussed above, along with the project trip generation estimates shown in Table IV-20. The expected project driveway volumes do not include the PCE adjustments for truck trips, since the operational capacities of the driveways are not evaluated in this manner. Additionally, the project's passenger vehicles were generally assumed to park in a relatively even distribution throughout the site, and were further assumed to enter and exit the site via the driveway nearest their potential parking locations; upon exiting, however, most vehicles destined for travel along northbound Avalon Boulevard were assumed to use the "middle" Avalon Boulevard driveway to take advantage of the existing median cut and the availability of the left-turn movement there, rather than exit onto eastbound Gardena Boulevard and then turn north at the intersection with Avalon Boulevard. Project truck trips were assigned based on the driveway access assumptions detailed earlier in this section.

During the AM peak hour, a total of approximately 26 inbound vehicles (17 passenger vehicles and nine trucks) and four outbound vehicles (all passenger vehicles) could be anticipated to use the northernmost Avalon Boulevard project driveway, while the "middle" driveway could be used by a total of

approximately 44 inbound and eight outbound vehicles (all passenger vehicles), and the southernmost driveway could be accessed by a total of approximately 13 inbound vehicles (all passenger vehicles) and five outbound vehicles (three passenger vehicles and two trucks); additionally, the project's Gardena Boulevard driveway could be expected to exhibit a total of approximately 20 inbound vehicles (eight passenger vehicles and 12 trucks) and an additional 11 outbound vehicles (seven passenger vehicles and four trucks). Similarly, during the PM peak hour, the northernmost Avalon Boulevard driveway is estimated to accommodate a total of approximately six inbound (four passenger vehicles and two trucks) and 11 outbound vehicles (all passenger vehicles), the "middle" driveway could exhibit a total utilization of approximately 11 inbound and 20 outbound vehicles (all passenger vehicles), and the southernmost driveway could be accessed by a total of approximately three inbound vehicles (all passenger vehicles) and an additional 14 outbound vehicles (nine passenger vehicles and five trucks), while the Gardena Boulevard driveway is assumed to exhibit a total of approximately five inbound vehicles (two passenger vehicles and three trucks) and 32 outbound vehicles (22 passenger vehicles and 10 trucks). These values represent the actual number of vehicles expected to enter and exit the project's driveways during the morning and afternoon peak hour periods analyzed in this study.

The project does not propose to install access control devices, such as "gate" arms activated by card keys or ticket dispensers, at any of the project's driveways, and as such, each of the driveways will exhibit "uncontrolled" entering and exiting capacities. Typically, uncontrolled driveways provide entry capacities of between 750 to 1,000 vehicles per hour per lane. Driveway exit capacities are dependent upon the amount of traffic/congestion on the frontage streets; the site driveways are expected to provide exit capacities of between 400 and 500 vehicles per hour; each of the four site driveways is configured as one entry and one exit lane, and as such, the "per lane" capacity values identified above represent the total vehicular capacities of each driveway.

A review of the peak hour project driveway volumes indicates that the vehicular demand at each of the project driveways for both inbound and outbound traffic will be substantially below the expected individual driveway access capacity levels. Therefore, the project driveways will provide more than sufficient capacity to accommodate the expected peak hour vehicular demands of the development, and will operate adequately, with no significant external vehicular queuing along either Avalon Boulevard or Gardena Boulevard, and no significant internal queuing within the site parking lot. As such, the proposed project would not pose a traffic safety hazard to users of the facility or surrounding roadways and impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

e) Would the project result in inadequate emergency access?

No Impact. A significant impact may occur if a project design would not provide emergency access meeting the requirements of public safety agencies, or in any other way threatened the ability of emergency vehicles to access and serve a project site or adjacent uses.

As previously discussed in Section 8(h), the proposed project is not located on or near an adopted emergency response or evacuation plan route. Emergency access to the project site would be provided by the existing and proposed street system. The proposed project would be designed and constructed in accordance with CMC requirements to ensure proper emergency access.

As shown in Section 16(a), while the proposed project is anticipated to affect vehicle/capacity ratios, it would not result in traffic congestion, under either project-only or cumulative traffic scenarios, and traffic impacts would be less than significant. Increases in traffic would not greatly affect emergency vehicles since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the project's proposed circulation plan and the above considerations, it is anticipated that all public safety agencies would be able to respond to on-site areas within the established response time. Furthermore, as described in Section 14(a), the proposed project would satisfy the emergency response requirements of the LACFD, and as discussed in Section 16(d), there are no hazardous design features included in the access design or site plan for the proposed project that could impede emergency access. Therefore, the proposed project would not be expected to result in inadequate emergency access, and the proposed project would have no impact on emergency access. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

f) Would the project conflict with adopted polices, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. A significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Public transit within the study area consists primarily of local-serving bus lines providing multiple stops and convenient localized access to shopping, business, and recreation destinations, although some regional transit opportunities are present. This bus service is operated primarily by the Los Angeles County Metropolitan Transportation Authority ("Metro"), although the City of Gardena and City of Carson also run buses within the project vicinity. However, while the area in general is served by a number of bus lines and other public transit facilities, only four bus lines currently provide stops at or within convenient walking distance (approximately one-quarter mile) of the project site; Metro Lines

52/352, the Carson Circuit Transit System Route H, and Gardena Municipal Bus Line 3. While other bus lines operated by these and other providers are not located close enough to the project site to be used directly, including Metro Line 51 along Compton Boulevard to the north, and Orange County Transit Authority ("OCTA") Line 721 along Artesia Boulevard and the Artesia/Gardena Freeway to the south, these and other transit lines can generally be accessed via connections or transfers from the site-serving lines to provide access to the project from the larger regional area.

Metro Lines 52/352 – These bus lines provide weekday, weekend, and holiday service between the Wilshire/Vermont Metro Red Line/Purple Line Station in the mid-Wilshire community of the City of Los Angeles and the Artesia Transit Center, located adjacent to the Harbor Freeway near 182nd Street. Lines 52/352 loop along Shatto Place, 6th Street, and Vermont Avenue around the Wilshire/Vermont station, then along 7th Street through downtown Los Angeles (with a stop at the 7th Street/Metro Center Transit Center) to San Pedro Street before turning south to travel along San Pedro Street and Avalon Boulevard through the project vicinity (with additional stops at the San Pedro Metro Blue Line Station and Avalon/I-105 Metro Green Line Station, to Victoria Street, before traveling along Victoria Street, Figueroa Street, and 182nd Street to the Artesia Transit Center. Lines 52/352 typically operate between about 4:30 AM and 12:30 AM every day, with Line 52 providing local-stop service along this route and Line 352 providing only limited-stop service, although both include a stop at Avalon Boulevard and Alondra Boulevard, approximately 300 feet north of the project site. Weekday headways for Lines 52/352 are approximately every three to five minutes in each direction during the peak morning and afternoon/evening periods, extending to 10 to 20 minutes or more during the off-peak hours, with weekend and holiday headways of approximately eight to 10 minutes throughout the day

Carson Circuit Transit System, Route H – This local-service shuttle provides weekday and Saturday service between the Vernon Hemingway Memorial Park area of the City of Carson (just east of the project site), and the South Bay Pavilion shopping center, in the southeast quadrant of the intersection of Avalon Boulevard and Del Amo Boulevard, approximately two and one-half miles south of the project site. Beginning at Avalon Boulevard, Route H loops along Gardena Boulevard, Claude Street, McKinley Avenue, and Alondra Boulevard before turning south along Avalon Boulevard past the project site (with stops at both Alondra Boulevard and Gardena Boulevard), providing a local-serving loop through the residential community south of the project site, bounded by 169th Street, Billings Drive, and Walnut Street, before continuing along Avalon Boulevard to the South Bay Pavilion. Route H operates between about 5:20 AM and 6:30 PM on weekdays, and between about 10:40 AM and 5:15 PM on Saturdays, with headways in both directions of approximately 40 minutes throughout the day every day.

Gardena Municipal Bus Line 3 – This bus line (not to be confused with the Gardena Municipal Bus Line 3 School Tripper, which does not serve the project vicinity) provides weekday and weekend service between the Martin Luther King, Jr. Transit Center and Metro Blue Line Compton Station, both located

near Compton Boulevard and Willowbrook Avenue in the City of Compton, and the South Bay Galleria shopping center near Redondo Beach Boulevard and Hawthorne Boulevard in the City of Torrance. Line 3 travels along Compton Boulevard, Wilmington Avenue, and Alondra Boulevard to Main Street, passing through the project vicinity along Alondra Boulevard and providing a site-serving stop at Avalon Boulevard. At Main Street, Line 3 then turns north to access Redondo Beach Boulevard, then travels west along this roadway to Hawthorne Boulevard before making a loop around the South Bay Galleria and returning to the Martin Luther King, Jr. Transit Center and Metro Blue Line Compton Station along the reverse route. Line 3 operates on weekdays between about 5:30 AM and 9:30 PM for eastbound travel and about 6:00 AM and 8:30 PM for westbound travel, and between about 5:30 AM and 7:00 PM for both eastbound and westbound travel on weekends. Weekday headways of approximately every 15 minutes are provided in both directions during the peak morning and afternoon/evening periods, but extend to about 30 minutes during the off-peak periods, while weekend headways are about 30 minutes in both directions throughout the day.

Although limited public transportation is currently available to visitors and employees of the proposed project, and the bus lines described above providing direct service to the project site allow transfers to and from a number of additional transit services throughout the area at multiple locations along their routes, or at designated transit centers served by these lines, practical use of the existing site-serving transit lines to travel significant distances throughout the region would typically require multiple and time-consuming transfers to these other lines. Therefore, in order to present the most conservative analysis of the potential traffic impacts of the project, no significant additional use of public transportation by project employees or visitors beyond that intrinsically included in the ITE trip generation data was assumed for this analysis.

Furthermore, the proposed project would not interfere with any class I or class II bikeway systems, as there are no there are no designated bikeway systems within the project vicinity. Since the proposed project would not modify or conflict with any alternative transportation policies, plans or programs, impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

17. UTILITIES AND SERVICE SYSTEMS

The General Plan EIR evaluated the following potential impacts with respect to utilities:

- **Water** – Implementation of the proposed General Plan may result in increased demand for water service within the City.
- **Sewer Services** – Implementation of the proposed General Plan may result in increased demand for the sewer system within the City.

- **Solid Waste** – Implementation of the proposed General Plan may result in increased demand for the solid waste service provided to the City.
- **Electricity** – Implementation of the proposed General Plan may result in increased demand in electricity service provided to the City.
- **Natural Gas** – Implementation of the proposed General Plan may result in increased demand in natural gas service provided to the City.
- **Telephone** – Implementation of the proposed General Plan may result in increased demand in telephone service provided to the City.

After implementation of the applicable policies of the General Plan, the General Plan EIR concluded that the environmental impacts related to the above topics would be:

- **Water** – Less Than Significant Impact.
- **Sewer Services** – Less Than Significant Impact.
- **Solid Waste** – Less Than Significant Impact.
- **Electricity** – Less Than Significant Impact.
- **Natural Gas** – Less Than Significant Impact.
- **Telephone** – Less Than Significant Impact.

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. A significant impact may occur if a project would discharge wastewater, whose content exceeds the regulatory limits established by the governing agency.

This question would typically apply to properties served by private sewage disposal systems, such as septic tanks. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes a NPDES permit that ensures compliance with wastewater treatment and discharge requirements.

The Los Angeles RWQCB enforces wastewater treatment and discharge requirements for properties in the project area. The proposed project would convey wastewater via municipal sewage infrastructure maintained by the Los Angeles County Sanitation Districts' (LACSD) Joint Water Pollution Control Plant (JWPCP). The capacity of the JWPCP is discussed in response to 17(b) below. The JWPCP is a public facility, and, therefore, is subject to the state's wastewater treatment requirements. As such, wastewater from the implementation of the proposed project at the project site would be treated

according to the wastewater treatment requirements enforced by the Los Angeles RWQCB, and no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving a project site would be exceeded.

Projected water and wastewater demand/generation associated with the proposed project is shown in Tables IV-24 and IV-25.

The General Plan EIR evaluated water and sewer services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided to serve this development and impacts would be less than significant. Since the proposed project would be consistent with the development projections for the City, impacts related to water and sewer services would be less than significant.

Water service to the proposed project would be provided by California Water Service Company which has sufficient water mains to serve the project site and surrounding area. Any request for service resulting from new development would be subject to a site-specific evaluation of the existing water system capacity to serve the development. If additional improvements or facilities are needed, the developer would be require to fund and/or contribute to the cost of the improvements. This would reduce any potential impacts related to water service to less than significant.

The City of Carson owns the sanitary sewer system in the City. The Los Angeles County Department of Public Works Consolidated Sewer Maintenance District (CSMD) maintains the sewer lines. The CSMD collects user fees for the operation and maintenance of the system. Trunk lines and the wastewater treatment plant are owned and operated by LACSD. The JWPCP has a design capacity of 385 million gallons per day and processes and average flow of approximately 329 million gallons per day. The CSMD charges a connection fee to cover the costs of connecting a development project to the sewer system, which mitigates the impact of individual projects on the sewer system. LACSD's facilities are sized and service improvements phased in accordance with SCAG regional growth projections. The General Plan growth projection was determined to be consistent with these projections and therefore a less than significant impact would result.

The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Table IV-24
Estimated Average Daily Water Demand for the Proposed Project

Land Use	Size	Consumption Rate [a]	Total Consumption (gpd)
Light Industrial	230,000 sf	22 gpd / 1,000 sf	5,060
		Total Water Consumption	**5,060**

Notes: gpd = gallons per day sf = square feet
[a] *Water consumption is assumed to be 110% of wastewater generation.*

Table IV-25
Estimated Average Daily Wastewater Generation for the Proposed Project

Land Use	Size	Generation Rate [a]	Total Generation (gpd)
Light Industrial	230,000 sf	20 gpd / 1,000 sf	4,600
		Total Wastewater Generation	**4,600**

Notes: gpd = gallons per day sf = square feet
[a] *Los Angeles County Sanitation Districts.*

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. A significant impact may occur if the volume of storm water runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new storm water drainage facilities.

As described in Section 9(c), the proposed project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the project site would continue to be collected on the site and directed towards existing storm drains in the vicinity after on-site treatment. Therefore, the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified.

As shown in Table IV-24 (Estimated Average Daily Water Demand for the Proposed Project), the proposed project's water demand would be 5,060 gpd. The General Plan EIR evaluated water services in the City in light of development projected to occur by 2020 and concluded that sufficient water supply and service would be provided to serve this development and impacts would be less than significant. Since the proposed project would be consistent with the development projections for the City, impacts related to water supply and service would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

e) 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?

Less Than Significant Impact. A project would normally have a significant wastewater impact if:

- A project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- A project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

As stated in Section 17(b), the sewage flow from operation of the proposed project would ultimately be conveyed to the JWPCP, which has sufficient capacity for the proposed project. Therefore, impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Projected solid waste generation associated with the proposed project is shown in Table IV-26. The General Plan EIR evaluated solid waste disposal in the City in light of development projected to occur by 2020 and concluded that sufficient service would be provided to serve this development and impacts would be less than significant. Since the proposed project would be consistent with the development projections for the City, impacts related to solid waste disposal service would be less than significant.

Waste Management, Inc. provides residential commercial and industrial waste collection service for the City of Carson. Solid waste collected in the City is taken to the company's transfer station in Carson where it is sorted. This facility has a permitted capacity of 5,300 tons per day. After removal of recyclables, remaining waste is transported to one of the company's landfills in the Antelope Valley (Palmdale and/or Lancaster) which have sufficient capacity to handle waste generated in the City.

The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Table IV-26
Estimated Average Daily Solid Waste Generation for the Proposed Project

Land Use	Size	Generation Rate [a]	Total Generation (lbs/day)
Light Industrial	230,000 sf	59.2 lbs / 1,000 sf	13,616
Total Solid Waste Generation			**13,616**

Notes: lbs = pounds sf = square feet
[a] *Cal Recycle, website: http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm. Converted from 0.0108 tons/sf/yr.*

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations.

The proposed project would generate solid waste that is typical of light industrial uses and would be disposed of in a manner consistent with all federal, state, and local statutes and regulations. As discussed in Section 8(a), any hazardous wastes generated at the project site would be expected to be handled by qualified personnel in accordance with existing laws and regulations regarding the handling and disposal of solid waste. Therefore, impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Cumulative Impacts

The General Plan EIR evaluated sewer, water and solid waste services in the City in light of development projected to occur by 2020 and concluded that sufficient services would be provided to serve the projected cumulative development in the City and impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

18. MANDATORY FINDINGS OF SIGNIFICANCE

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

No Impact. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues, as discussed in the preceding sections.

The proposed project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources or cultural resources. The proposed project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, no impact would occur. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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. A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

As concluded in this analysis, the proposed project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. As such, the proposed project's contribution to cumulative impacts would be less than significant. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified 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. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. The analysis contained in this Initial Study concludes that the proposed project will not result in significant adverse effects after implementation of mitigation measures. The proposed project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

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VI. ACRONYMS & ABBREVIATIONS

AB	Assembly Bill
ARB	California Air Resources Board
ASTM	American Society for Testing Materials
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
APN	Assessor Parcel Number
bgs	Below ground surface
BID	Business Improvement District
BMPs	Best Management Practices
CAPCOA	California Air Pollution Control Officer's Association
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAT	Climate Action Team
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CH_4	Methane
CMP	Congestion Management Program
CO_2	Carbon Dioxide
CORTESE	California Hazardous Waste and Substances
cy	Cubic yards
dBA	A-weighted decibel
du	Dwelling unit
EPA	Environmental Protection Agency (see also USEPA)
ESA	Environmental Site Assessment
FAR	Floor Area Ratio
gpd	Gallons per day

GFA	Gross floor area
GHG	Greenhouse gas
gpm	Gallons per minute
HFC	Hydrofluorocarbons
H_2O	Water Vapor
HTP	Hyperion Treatment Plant
IS	Initial Study
LACRA	City of Los Angeles Redevelopment Agency
LADRP	City of Los Angeles Department of Recreation and Parks
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
lbs	Pounds
LOS	Level of Service
LST	Localized Significance Threshold
LUST	Leaking Underground Storage Tank
mgd	Million gallons per day
MRZ-2	Mineral Resource Zone 2
MTA	Los Angeles County Metropolitan Transit Authority
NAHC	Native American Heritage Commission
N_2O	Nitrous Oxide
NPDES	National Pollution Discharge Elimination System
PFC	Perfluorocarbon
PSI	Pounds per square inch
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Compensation and Recovery Act

RD	Reporting District
ROWD	Report of Waste Discharge
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
sf	Square foot
SF_6	Sulfur Hexafluoride
SOPA	Society of Professional Archaeologists
SRA	Source Receptor Area
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
T-FAR	Transfer of Floor Area
USEPA	United States Environmental Protection Agency (see also EPA)
USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
V/C	Volume/capacity
VOC	Volatile Organic Compound