Initial Study/Mitigated Negative Declaration

Calas Park Stormwater and Water Quality Improvements Supplemental Environmental Project

AUGUST 2025

Prepared for:

CITY OF CARSON

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Prepared by:



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CALAS PARK STORMWATER AND WATER QUALITY IMPROVEMENTS SUPPLEMENTAL ENIVRONMENTAL PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Acronyms and Abbreviations

AB Assembly Bill AERMOD American Meteorological Society/Environmental Protection Agency Regulatory Model AQMP air quality management plan BMP best management practice CAAQS California Ambient Air Quality Standards CalEEMod California Emissions Estimator Model CAL FIRE California Department of Forestry and Fire Protection CARB California Air Resources Board CEQA California Environmental Quality Act CH4 methane CHRIS California Historical Resources Information System City City of Carson CO carbon monoxide
AQMP air quality management plan BMP best management practice CAAQS California Ambient Air Quality Standards CalEEMod California Emissions Estimator Model CAL FIRE California Department of Forestry and Fire Protection CARB California Air Resources Board CEQA California Environmental Quality Act CH4 methane CHRIS California Historical Resources Information System City City of Carson
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CEQA California Environmental Quality Act CH4 methane CHRIS California Historical Resources Information System City City of Carson
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CHRIS California Historical Resources Information System City City of Carson
City City of Carson
CO ₂ carbon dioxide
CO ₂ e carbon dioxide equivalent
dBA A-weighted decibel
DC WMG Dominguez Channel Watershed Management Area Group
DPM diesel particulate matter
EPA U.S. Environmental Protection Agency
EWMP Enhanced Watershed Management Program
FEMA Federal Emergency Management Agency
GHG greenhouse gas
GWP global warming potential
HARP2 Hotspots Analysis and Reporting Program Version 2
HRA health risk assessment
I Interstate
ips inches per second
IS initial study
LCI Governor's Office of Land Use and Climate Innovation
L _{eq} equivalent noise level over a given period
LOS level of service
LST localized significance threshold
MM Mitigation Measure
MND mitigated negative declaration
MS4 Municipal Separate Storm Sewer System
MT metric tons
N ₂ O nitrous oxide
NAAQS National Ambient Air Quality Standards
NAHC Native American Heritage Commission
NHMLA Natural History Museum of Los Angeles County

Acronym/Abbreviation	Definition
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
0 ₃	ozone
PM ₁₀	particulate matter with an aerodynamic diameter equal to or less than 10 microns
PM _{2.5}	particulate matter with an aerodynamic diameter equal to or less than 2.5 microns
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SLF	Sacred Lands File
SO ₂	sulfur dioxide
SO _x	sulfur oxides
SWPPP	stormwater pollution prevention plan
TAC	toxic air contaminant
TCR	tribal cultural resource
VMT	vehicle miles traveled
VOC	volatile organic compound

1 Introduction

The City of Carson (City) has prepared this mitigated negative declaration (MND) to assess and disclose the potential impacts on the environment of the Calas Park Stormwater and Water Quality Improvements Supplemental Environmental Project (project) pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000, et. seq). This section of the MND provides information on project background, explains the project's purpose and need, and describes the City's CEQA obligations associated with approving and implementing the project.

1.1 Project Background and Overview

Calas Park is a public recreational facility maintained by the City's Parks and Recreation Department, located west of the Dominguez Channel. It is located in the southern portion of the City at 1000 East 220th Street, south of East 220th Street between Bonita Street and South Edgar Street. Additional information regarding Calas Park is provided in Section 2.1, Project Location and Environmental Setting. Calas Park amenities include a community center with an activity room and recreation room, playground equipment, two tennis courts, a basketball court, a soccer field, two baseball/softball fields, a wading pool, and restroom facilities. The majority of Calas Park is owned by the City, and the west side of Calas Park is in a utility easement maintained by Los Angeles City Department of Water and Power.

The project would divert and capture stormwater runoff from existing storm drains into a subterranean concrete basin proposed beneath the northeast corner of the baseball/softball and soccer outfields in the park. Prior to flowing into the subsurface basin, runoff would be directed through a pre-treatment device that would remove trash, sediments, and solids present in the runoff. An electric pump would be installed to return treated stormwater back to the existing catch basin. Other improvements associated with the stormwater capture infrastructure include installation of a vegetated bioswale north of the tennis courts to capture street runoff, planting of 11 new trees, and reconstructing the sidewalk and drain immediately west of the tennis courts to repair surface lifting and damage, and the accompanying drain on its edge.

Once the proposed stormwater capture and filtration facility is installed, the existing baseball/softball and soccer outfields would be replaced. The existing outfield fence along East 220th Street would be replaced with a 12-foot fence and ballfield turf removed for construction of the project would be replaced with city-provided soil and sod specifications, and a new booster pump to assist the existing irrigation system would be evaluated

The project is the result of the 2023 Settlement Agreement and Stipulation Order No. R4-2023-0088 (Stipulated Order) between the Sanitation Districts and the Los Angeles Regional Water Quality Control Board. The Sanitation Districts have agreed to provide funding for the City to implement the project workplan in response to violations occurring from discharge of untreated wastewater into the Dominguez Channel. The performance goal included in the Stipulated Order is for the project to capture and pre-treat 2.8 acre-feet of stormwater annually and infiltrate the stormwater onsite through the use of underground storage vaults, bioswales, rain gardens, and infiltration galleries.

The City is a member of the Dominguez Channel Watershed Management Area Group (DC WMG). The DC WMG formed to plan, implement, and manage water quality control projects in the Dominguez Channel watershed. The

DC WMG is a collaborative effort of eight municipalities¹ and the Los Angeles County Flood Control District, which respectively are governed by the Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit (Order No. R4-2012-0175). The DC WMG prepared the Enhanced Watershed Management Program (EWMP) in 2016 (revised in June 2021) to plan and prioritize projects implementing the requirements of the MS4 permits on a watershed scale (DC WMG 2016). The MS4 permit sets effluent and receiving water limitations for municipal drainage systems in Los Angeles County, and requires permittees to establish plans to meet specific total maximum daily load requirements for discharge of pollutants in their respective receiving waters. This project has the potential to offer runoff storage and water quality benefits for the City and other DC WMG members, helping to achieve EWMP goals and MS4 permit compliance.

The City is implementing the project in their capacity as a result of the Stipulated Order between the Sanitation Districts and the Los Angeles Regional Water Quality Control Board and would be responsible for operating and maintaining the project facilities.

1.2 Purpose and Need

The project's primary purpose is to decrease the amount of pollutants in stormwater and dry-weather runoff entering the Dominguez Channel. The City's objectives in implementing the project are as follows:

- Comply with the requirements of the Stipulated Order
- Improve water quality within the Dominguez Channel
- Restore and rehabilitate park facilities
- Educate the public on the local stormwater issues

1.3 California Environmental Quality Act Compliance

1.3.1 Authority to Prepare an MND

Approval by the Carson City Council to issue a construction contract for the project constitutes a discretionary action that triggers environmental review requirements pursuant to CEQA, with the City serving as lead agency. The City prepared a CEQA initial study (IS) to analyze and consider the environmental impacts of implementing the project, which is included as Chapter 3 of this document. Based on the results of the IS, the City determined that an MND is the appropriate environmental document for compliance with CEQA. As stated in Section 21064 of the CEQA statute, an MND may be prepared for a project subject to CEQA when an IS has identified no potentially significant effects on the environment when mitigation is identified that can reduce impacts to less-than-significant levels.

1.3.2 Public Review and Final MND Process

The City is making the MND available for public review and comment pursuant to Section 15073 of the CEQA Guidelines. A copy of the MND and related documents are available for review on the City's website (xxxxxxxxx).

The DC WMG municipalities are County of Los Angeles, City of Los Angeles, City of Hawthorne, City of Inglewood, City of El Segundo, City of Lomita, City of Carson, and City of Lawndale.

The City has identified a 30-day review and comment period for the MND commencing xxxx, 2025 and terminating xxxx, 2025.

Comments on the MND may be submitted to the City in writing before the end of the public review period. In reviewing and commenting on the MND, interested public agencies and members of the public should focus on the adequacy of the document in identifying and analyzing the project's potential impacts on the environment. Written comments on the IS/MND will be accepted in hard copy or email format, and should be received at the following street address or email address by 5:00 p.m., xxxx, 2025:

City of Carson 701 East Carson Street Carson, California 90745 Contact: Roland Jen Email: rjen@ccarsonca.gov

Following the close of the public comment period, City staff will review all comments and may revise the MND if necessary to clarify the document's content. City staff will then prepare a final version of the MND that includes all comment letters received during the public review period and will send the MND to the City Council for adoption and consideration in their decision to approve the project.

The environmental impact review presented in this MND is based on an initial design of the stormwater capture project (30% design). As additional design is completed following the City Council's adoption of the MND, City staff will review project details, compare them to the information presented in the MND, and determine conformance with the project's CEQA record. Minor deviations from the design assumed in the MND may be addressed either by a consistency determination by City staff or by an addendum to the MND. If subsequent changes in the project are substantial to the extent that they "require major revisions of the previous...negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects," then the City would be required by Section 15162 of the CEQA Guidelines to prepare a subsequent MND, initiate an additional CEQA public review period, and send the subsequent MND to the City Council for adoption.

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2 Project Description

2.1 Project Location and Environmental Setting

The project is located in the southern portion of the City, which is in southwestern Los Angeles County, as shown in Figure 1, Project Location. The project site includes portions of East 220th Street between Bonita Street and South Edgar Street and covers approximately 5.87 acres, including the two baseball/softball outfields, the soccer field, the tennis courts, the basketball court, and the parking area at Calas Park. The park is in a developed part of the City that primarily features residential, commercial, office, and light industrial/warehousing uses and schools. The park is upside down L-shaped with a transmission line corridor running along the western portion of the park. The primary components of the park are concentrated in the north and northeast areas of the park. To the north, the park is bounded by East 220th Street, followed by Carnegie Middle School, a grassy area containing the transmission line corridor, and residential uses. To the south, the park is bounded by East Jay Street, followed by residential uses, and East 223rd Street, followed by light industrial/warehousing, office, and commercial uses. To the east, the park is bounded by South Edgar Street, followed by residential uses. To the west, the park is bounded by residential uses. Regional access to the park is from Interstate (I)-405, which is approximately 0.18 miles to the east; State Route 47, which is approximately 1.55 miles to the east; and I-110, which is 1.60 miles to the west; and I-710, which is approximately 2.72 miles to the east. The site is designated as Park/Open Space in the City General Plan Land Use Policy Map (City of Carson 2023) and is zoned as Open Space in the City Zoning Map (City of Carson 2017).

Calas Park features flat terrain and is approximately 8.80 acres. Existing park uses are shown in Figure 2, Project Site and Existing Features. The majority of the park is made up of baseball/softball fields, a soccer field that is configured in the outfield areas of the baseball/softball fields, the tennis courts, and the basketball court. An asphalt parking lot is located in the northeastern portion of the park accessed from East 220th Street, and features 16 regular parking spaces and two ADA parking spaces. There are paved walking paths, benches, and picnic tables throughout the park. Field lighting is provided from a series of light poles situated around the fields. Mature trees grow in various areas around the park. An irrigation system with underground pipes and sprinkler heads is in place throughout the park. The grass fields are currently used for formal sports leagues for youth and adults year-round.

2.2 Project Characteristics

The project entails constructing and operating a stormwater capture and treatment facility within the northern portion of Calas Park, as well as other ancillary park improvements. The project is currently in the final design phase, and the City has developed certain design and engineering assumptions for purposes of defining the project for informational purposes and conducting environmental impact review pursuant to CEQA. Actual details of the project may vary from the information provided below.

2.2.1 Stormwater Capture System

The stormwater capture and treatment facility would intercept stormwater and dry-weather flow from two existing underground storm drains, one north of the intersection of East 220th Street and Bonita Street and the other in East 220th Street, and a box culvert storm drain in East 220th Street and convey flows into an underground storage reservoir that would be installed beneath the northeast corner of the baseball/softball and soccer outfields area.

An electric pump would be installed to return treated stormwater back to the existing catch basin. The stormwater capture project features are shown in Figure 3, Proposed Stormwater Capture and Treatment System.

Stormwater Diversion Infrastructure and Pretreatment Devices

A 5.6 cubic feet per second concrete diversion pipeline with manhole access would be constructed within East 220th Street running from the intersection of East 220th Street and Bonita Street to north of the tennis courts at Calas Park. The diversion pipeline would be constructed to connect the proposed system to the existing 42-inch storm drain north of the intersection of East 220th Street and Bonita Street, the existing 24-inch storm drain located south of the intersection of East 220th Street and Foley Avenue intersection underneath Calas Park, and the existing 6' × 2.25' box culvert storm drain located west of the East 220th Street and Foley Avenue intersection under the north sidewalk. Diversion structures along the diversion pipeline would be underground concrete vaults encasing the existing storm drains and connecting the existing storm drains to the 18-inch-diameter underground diversion pipeline. The diversion structures would have a manhole for personnel and equipment access. The diversion pipeline alignment inside a concrete vault with a manhole for personnel and equipment access. The pretreatment device is a 5.6 cubic feet per second hydrodynamic separator, which directs water through a screen to filter out large debris and into a cylindrical separation chamber where water swirls and forces particles out of the runoff, settling them in an isolated sump. Hydrocarbons float to the top of the water surface and are prevented from being transported downstream.

Storage Reservoir and Infiltration Galleries

After pretreatment, water would flow into a filter along the diversion line and then into an underground storage reservoir installed beneath the northeast corner of the baseball and soccer fields area. The underground storage reservoir would have a capacity of 1 acre-foot and would have an area of approximately 0.14 acres according to preliminary design information. The field surface would be removed, and earth material would be excavated, removed, and hauled off site for reuse or disposal. The excavation is anticipated to be 20 feet deep. The underground stormwater storage system would be formed as a series of precast cells made of reinforced, high-strength concrete that would be hauled to the site on flatbed trucks, lowered into place by a crane, and grouted together to form a single chamber. Once the system is installed and tested, the baseball/softball and soccer fields surfaces would be replaced and would continue to function as under current conditions.

A geotechnical evaluation of the project site concluded that soils beneath Calas Park are of insufficient infiltrative capability to allow for subgrade percolation (Ninyo & Moore 2025). The reservoir will be designed to facilitate filtration of captured stormwater. The storage reservoir will be supported on spread footings on compacted fill, in accordance with the geotechnical evaluation (Ninyo & Moore 2025).

Discharge System and Treatment

A pump station with an electric pump would be installed to pump treated stormwater to the existing catch basin. Water flowing back into the storm drain would be cleaner than when originally diverted, having been through a pretreatment hydrodynamic separator system and cartridge filter system, as well as having been clarified while retained in the reservoir.

Bioswale

A vegetated bioswale would be installed north of the park's tennis courts and south of East 220th Street, featuring native vegetation and decorative boulders. The bioswale would capture and detain surface storm runoff from East 220th Street and a portion of the park and carry it to an inlet pipe connecting to the diversion pipeline to be filtered and stored within the stormwater capture system.

2.2.2 Park Improvements

The proposed park improvements would replace existing amenities with improved features that would allow for similar active and passive recreation uses as under existing conditions, but with an enhanced experience for park users. Once the stormwater capture system is installed, the existing baseball/softball and soccer outfields would be replaced. The existing outfield fence along East 220th Street would be replaced with a 12-foot fence and ballfield turf removed for construction of the project would be replaced with city-provided soil and fescue specifications, and a new booster pump to assist the existing irrigation system would be evaluated. The project would reconstruct the sidewalk and drain immediately west of the tennis courts to repair surface lifting and damage, and the accompanying drain on its eastern edge. A decomposed granite path would be installed on the east side of the tennis courts to provide a connection from the sidewalk into the park. A new landscaped area would be installed adjacent to the decomposed granite path between the tennis courts and parking lot. Two new benches would be installed adjacent to the bioswale area north of the tennis courts and 11 new trees would be planted within the project area.

2.2.3 Temporary Construction Access, Staging, and Park Closure

Construction access would be provided from East 220th Street. Temporary equipment staging and construction trailers would be established within the existing park boundary, with no additional off-site staging anticipated to be needed. The baseball and soccer fields are expected to be closed to the public for the duration of project construction, which is anticipated to be 14 months. The remaining portions of the park (tennis courts, basketball courts, the parking lot, and the existing structures) would be open to the public during construction.

2.3 Construction Phasing and Schedule

Table 2-1 presents the anticipated construction phasing, equipment usage, and duration assumed for the project for purposes of environmental impact analysis in this MND. These assumptions were developed in consultation with the project design engineers for consideration in Section 3.3, Air Quality; Section 3.6, Energy; Section 3.8, Greenhouse Gas Emissions; and Section 3.13, Noise. The total duration of project construction is anticipated to be approximately 14 months, with some phases overlapping. Typical construction work hours would be Monday through Friday, 7:00 a.m. to 8:00 p.m. Night work is not anticipated. Construction is anticipated to begin in October 2026 with a duration of approximately 14 months.

Table 2-1. Anticipated Construction Phasing and Equipment

Construction Phase	Anticipated Equipment	Estimated Duration	
Demolition of existing field and structures	Dozer	10 weeks	
	Grader		
	Skid steer loader		
	Haul trucks		
Site preparation, clearing, and grubbing	Dozer	4 weeks	
	Tractor/loader/backhoe		
	Jack hammer		
	Haul trucks		
Reservoir excavation	Dozer	14 weeks	
	Tractor/loader/backhoe		
	Skid steer loader		
	Haul trucks		
Reservoir construction	Crane	10 weeks	
	Dozer		
	Skid steer loader		
Installation of pipe, diversion structures, pre-treatment facility,	Crane	10 weeks	
pump, and bioswale overflow inlet	Trencher		
	Skid steer loader		
	Haul trucks		
Outlet line construction	Dozer 4 weeks		
	Skid steer loader		
	Tractor/loader/backhoe		
Field replacement, bioswale planting/landscaping, and other site	Grader	16 weeks	
improvement	Skid steer loader		
	Pavers		
	Paving equipment		
	Rollers		
	Turf aerator		
	Spreader sprayer		
	Telehandler		
	Cement mixer		
	•••••••		

2.4 Project Operation

Once construction is complete, project operation is anticipated to entail routine maintenance performed by the City at the stormwater capture facility and other park features. Routine maintenance and operations would require up

to two workers. Reservoir maintenance would entail removal of debris and pollutant constituents from the treatment devices, pump testing and calibration, and cleaning the storage reservoir.

2.5 Rermits and Approvals

The City of Carson is the CEQA lead agency, with the Carson City Council holding primary responsibility for adopting this MND and approving commencement of project construction. The project will also require the issuance of an excavation permit and an encroachment permit by the City for the proposed digging and construction within the public right-of-way. Other public agency approvals include the following:

- A Major Modification Permit issued by the Los Angeles County Flood Control District
- The State Water Resources Control Board will serve as a responsible agency under CEQA for their approval of a stormwater pollution prevention plan (SWPPP) in compliance with the Construction General Permit.

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3 Initial Study Checklist

1. Project title:

Calas Park Stormwater and Water Quality Improvements Supplemental Environmental Project

2. Lead agency name and address:

City of Carson 701 East Carson Street Carson, California 90745

3. Contact person and phone number:

Roland Jen Public Works Department 701 East Carson Street Carson, California 90745

4. Project location:

The project is located in the southern portion of the City of Carson within a portion of the existing Calas Park at 1000 East 220th Street, Carson, California.

5. Project sponsor's name and address:

City of Carson 701 East Carson Street Carson, California 90745

6. General plan designation:

Park/Open Space

7. Zoning:

Open Space

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):

Refer to Chapter 2, Project Description, above.

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

Refer to Section 2.1, Project Location and Environmental Setting, above.

10.	Other public agencies who participation agreement):	se a	approval is	required	(e.g.,	permits,	financing	approval,	, or
	Los Angeles County Flood Contr	ol Dis	trict; State W	ater Resou	rces Con	trol Board			
11.	Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?								
	Refer to Sections 3.5 and 3.18,	belov	٧.						
Enviro	nmental Factors Potentially	Affect	ed						
	vironmental factors checked belo a "Potentially Significant Impact,"		•	•	•		•	east one im	pact
	Aesthetics		Agriculture Forestry Re			Air Quali	ty		
	Biological Resources		Cultural Re	esources		Energy			
	Geology and Soils		Greenhous Emissions	se Gas		Hazards Material	and Hazard s	lous	
	Hydrology and Water Quality		Land Use a Planning	and		Mineral	Resources		
	Noise		Population Housing	and		Public Se	ervices		
	Recreation		Transporta	tion		Tribal Cu	ıltural Reso	urces	

Wildfire

Utilities and Service Systems

Mandatory Findings of Significance

Determination (To be completed by the Lead Agency)

On the	e basis of this initial evaluation:	
	I find that the proposed project COULD NOT have a significant effect on DECLARATION will be prepared.	the environment, and a NEGATIVE
	I find that although the proposed project could have a significant effect be a significant effect in this case because revisions in the project have project proponent. A MITIGATED NEGATIVE DECLARATION will be prepar	e been made by or agreed to by the
	I find that the proposed project MAY have a significant effect on the envi IMPACT REPORT is required.	ironment, and an ENVIRONMENTAI
	I find that the proposed project MAY have a "potentially significant imparmitigated" impact on the environment, but at least one effect (1) has been a document pursuant to applicable legal standards, and (2) has been a based on the earlier analysis as described on attached sheets. An EN required, but it must analyze only the effects that remain to be address	en adequately analyzed in an earlie addressed by mitigation measures IVIRONMENTAL IMPACT REPORT is
	I find that although the proposed project could have a significant effect potentially significant effects (a) have been analyzed adequately in an REPORT or NEGATIVE DECLARATION pursuant to applicable standard mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or revisions or mitigation measures that are imposed upon the proposed pr	n earlier ENVIRONMENTAL IMPACT ds, and (b) have been avoided o NEGATIVE DECLARATION, including
Signa	ature	Date

Evaluation of Environmental Impacts

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

3.1 Aesthetics

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
l.	AESTHETICS - Except as provided in Public Re	esources Code S	Section 21099, wo	ould the project:	
a)	Have a substantial adverse effect on a scenic vista?			\boxtimes	
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				

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

Less-than-Significant Impact. Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines. Certain urban settings or features, such as a striking or renowned skyline, may also represent a scenic vista. Scenic vistas are generally accessible from public vantage points, such as public roadways and parks. The City's General Plan Open Space and Environmental Conservation Element, which provides guidance and policies for the management of the City's natural resources, does not specifically list or identify any designated scenic vistas or specific scenic resources within the City. Calas Park is in a predominantly residential area of the City that features a single-family residential development, interspersed with commercial, industrial, and public uses. Project construction would result in temporary visual changes to the park, including the presence of excavated areas and staging of construction equipment. Upon completion of construction, these temporary visual changes would cease, and the visual quality of the project site would return to conditions similar to pre-construction conditions. The project's infrastructure would mostly be located underground and would not be visible during project operation. Other project components would include replacement of existing amenities with improved features, as described in Section 2.2.2, Park Improvements, which are intended in part as improvements to the visual environment. As such, impacts would be less than significant.

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. There are no designated state scenic highways in the vicinity of the project site. The nearest eligible scenic highway is a segment of Highway 1 located approximately 7 miles southeast of the project site (Caltrans 2024). Due to intervening development and distance, the project site is not visible from this segment of Highway 1. Therefore, the project would not substantially damage scenic resources within a state scenic highway and **no impact** would occur.

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

No Impact. Per PRC Section 21071, an "urbanized area" is defined as "(a) An incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons. [or] (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." The project site is located in the incorporated City of Carson, which has a population of 95,558 persons as of the 2020 census (U.S. Census Bureau 2020). However, with the incorporation of the population of a contiguous city such as the City of Compton, which has a population of 95,740 as of the 2020 census, the project site is considered to be located in an urbanized area (U.S. Census Bureau 2020).

As discussed in Section 3.1(a), Aesthetics, above, the project site is not visible from any prominent public viewpoints. Temporary visible elements associated with the project include construction equipment, staging activities, and temporary fencing to be included for safety and security purposes. Visual impacts resulting from construction activities would be temporary, ceasing upon completion of construction.

The project would comply with any applicable zoning or other regulations governing scenic quality. The project site is not subject to overlay zones or other such designations specific to scenic resources or quality. The proposed stormwater capture and treatment facility would be located primarily underground. In addition, the project would include replacement of existing amenities with improved features as described in Section 2.2.2, Park Improvements, which would enhance the park's visual quality. The project would result in the continued use of the site as a park and would not substantially differ visually from its current use. Implementation of the project would not conflict with the applicable zoning and other regulations governing scenic quality. **No impact** would occur.

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

Less-than-Significant Impact. The project is located in an urban area with existing sources of nighttime lighting from roadways, residences, and the existing Calas Park. Existing lighting at Calas Park consists of lighting within facilities, including existing field lighting, and along pedestrian pathways for safety and security. No nighttime work would occur during construction of the project; therefore, construction activities would not result in a new source of nighttime light. The proposed project would not include removal, replacement, or installation of any lighting. The materials that would be used for the project would not be

reflective in nature and would not serve as a new source of glare (such as large areas of glass). Therefore, impacts would be **less than significant**.

3.2 Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	AGRICULTURE AND FORESTRY RESOURCES – significant environmental effects, lead agenci Site Assessment Model (1997) prepared by the in assessing impacts on agriculture and farmle including timberland, are significant environmental compiled by the California Department of Forest land, including the Forest and Range Assand forest carbon measurement methodology. Resources Board. Would the project:	es may refer to ne California Del and. In determinental effects, le estry and Fire Pressessment Proje	the California Agri pt. Conservation a ning whether impa and agencies may otection regarding ect and the Forest	cultural Land Events an optional macts to forest reserved to informate the state's investigation.	raluation and odel to use sources, tion entory of nent project;
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				\boxtimes
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				\boxtimes
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				\boxtimes
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes
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?				\boxtimes

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. According to the California Important Farmland Finder database, the project site and its immediate surroundings are classified as "Urban and Built-Up Land" (DOC 2025a). The project would not

be located on land classified as Farmland pursuant to the Farmland Mapping and Monitoring Program and would therefore not convert any Farmland to non-agricultural use. **No impact** would occur.

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

No Impact. The project site is zoned Open Space. Surrounding Calas Park are areas zoned Residential – Single Family (City of Carson 2017). The City does not contain any lands zoned for agricultural use. There are no existing lands under a Williamson Act contract within the City. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. **No impact** would occur.

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

No Impact. The project site and surrounding areas are entirely urbanized, and are not zoned for nor contain any forest land or timberland. Therefore, the project would not conflict with or cause the rezoning or conversion of forest land or timberland. **No impact** would occur.

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

No Impact. Refer to Section 3.2(c), Agriculture and Forestry Resources. No impact would occur.

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

No Impact. Refer to Sections 3.2(a) through 3.2(d). The project site is located in an urbanized area with no existing agricultural uses, Farmland, or forest lands in the vicinity. The City does not contain any lands zoned for agricultural uses. Therefore, the project would not involve other changes that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. **No impact** would occur.

3.3 Air Quality

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact	
III.	III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
a)	Conflict with or obstruct implementation of the applicable air quality plan?			\boxtimes		

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				
c)	Expose sensitive receptors to substantial pollutant concentrations?				
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			\boxtimes	

This section is based on technical analysis conducted by Dudek, including quantitative estimates of air pollutant emissions based on assumptions developed in consultation with the project design engineers. The results of the emissions estimates are provided as Appendix A, Air Quality and Greenhouse Gas Modeling, and Appendix B, Construction Health Risk Assessment Modeling, to this MND.

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

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

The SCAQMD administers the SCAB's air quality management plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP for the SCAB is the 2022 AQMP (SCAQMD 2022). The 2022 AQMP provides the regional path towards improving air quality and meeting federal standards for air pollutants. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low oxides of nitrogen [NO_x] technologies in other applications), best management practices (BMPs), co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other Clean Air Act measures to achieve the 2015 federal ozone (O₃) standard by 2037 (SCAQMD 2022).

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the 2022 AQMP, and if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

- Consistency Criterion No. 1: Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Consistency Criterion No. 2: Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed under Section 3.3(b), Air Quality. Detailed results of this analysis are included in Appendix A, Air Quality and Greenhouse Gas Modeling. As presented in that analysis and summarized in Section 3.3(b), Air Quality, the proposed project would not generate construction or operational criteria air pollutant emissions that exceed the SCAQMD's thresholds, and the project would therefore be consistent with Criterion No. 1.

The second criterion regarding the potential of the proposed project to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the proposed project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (SCAQMD 1993). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Thus, demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for their 2020–2045 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) were used to estimate future emissions in the 2022 AQMP (SCAQMD 2022; SCAG 2020).^{2,3} The SCAG 2020–2045 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2022 AQMP is generally consistent with local government plans.

The project would not change the existing use of Calas Park and would be consistent with the underlying land use and zoning designations. Upon completion, project operation is anticipated to entail routine maintenance, which would require up to two workers for operations and maintenance. Therefore, the project would not result in substantial unplanned population growth in the area. Accordingly, the project does not conflict with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development and does not propose activities that would induce additional population in the project area. Impacts would be **less** than significant.

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SCAG adopted Connect SoCal 2024, the 2024-2050 RTP/SCS (SCAG 2024), but the growth projections therein have not yet been incorporated into an adopted AQMP.

Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including CARB, the California Department of Transportation, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic Projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities Projections in their 2020–2045 RTP/SCS are integrated in the 2022 AQMP (SCAQMD 2022).

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

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

A quantitative analysis was conducted to determine whether the proposed project might result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS, or cumulatively contribute to existing nonattainment ambient air quality standards. Criteria air pollutants include O_3 , nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM₁₀), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM_{2.5}), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and NO_x, which are important because they are precursors to O₃, as well as CO, sulfur oxides (SO_x), PM₁₀, and PM_{2.5}.

Regarding NAAQS and CAAQS attainment status, 4 the SCAB is designated as a nonattainment area for national and California O_3 standards and $PM_{2.5}$ standards. The SCAB is designated as a nonattainment area for California PM_{10} standards; however, it is designated as an attainment area for national PM_{10} standards. The SCAB is designated as an attainment area for national and California CO standards, national and California NO_2 standards, and national and California SO_2 standards (EPA 2025; CARB 2023). Although southern Los Angeles County, where the project is located, has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.

The proposed project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. SCAQMD has established Air Quality Significance Thresholds, as revised in March 2023, that set forth quantitative emission significance thresholds below which a project would not have a significant impact on ambient air quality (SCAQMD 2023). The quantitative air quality analysis provided herein applies the SCAQMD thresholds identified in Table 3.3-1 to determine the potential for the project to result in a significant impact under CEQA.

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

⁵ Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

Table 3.3-1. SCAQMD Air Quality Significance Thresholds

Pollutant	Construction (pounds per day)	Operation (pounds per day)					
VOCs	75	55					
NO _x	100	55					
CO	550	550					
SO _x	150	150					
PM ₁₀	150	150					
PM _{2.5}	55	55					
Leada	3	3					
Toxic Air Contaminants (TACs)	and Odor Thresholds						
TACsb	Maximum incremental cancer risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic and acute hazard index ≥ 1.0 (Project increment)						
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402						
Ambient Air Quality Standards	for Criteria Pollutantso						
NO_2 1-hour average NO_2 annual arithmetic mean							
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; Project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)						
PM ₁₀ 24-hour average	10.4 μg/m³ (construction) ^d 2.5 μg/m³ (operation)						
PM ₁₀ annual average	1.0 μg/m³						
PM _{2.5} 24-hour average	10.4 μg/m³ (construction) ^d						
	2.5 μg/m³ (operation)						

Source: SCAQMD 2023.

Notes: SCAQMD = South Coast Air Quality Management District; VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; TAC = toxic air contaminant; NO_2 = nitrogen dioxide; PM_{10} = parts per million by volume; PM_{10} = micrograms per cubic meter.

greenhouse gas emissions thresholds for industrial Projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not include included in this table as they are addressed within the greenhouse gas emissions analysis and not the air quality analysis.

- The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.
- b TACs include carcinogens and noncarcinogens.
- e Ambient air quality standards for criteria pollutants are based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.
- d Ambient air quality threshold are based on SCAQMD Rule 403.

A project would result in a cumulatively considerable net increase for O_3 , which is a nonattainment pollutant, if the proposed project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 3.3-1. These emission-based thresholds for O_3 precursors are intended to serve as a surrogate for an O_3 significance threshold (i.e., the potential for adverse O_3 impacts to occur)

because O_3 itself is not emitted directly, and the effects of an individual project's emissions of O_3 precursors (i.e., VOCs and NO_x) on O_3 levels in ambient air cannot be determined reliably or meaningfully through air quality models or other quantitative methods.

California Emissions Estimator Model (CalEEMod) Version 2022.1.1.29 was used to estimate emissions from construction and operation of the project. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction and operational activities from a variety of land use projects, including recreational development. The following discussion summarizes the quantitative project-generated construction and operational emissions and impacts that would result from implementation of the proposed project.

Construction Emissions

Construction of the proposed project would include demolition, site preparation, reservoir excavation, reservoir construction, pipeline/diversion/treatment facility installation, outlet line construction, and field replacement/bioswale planting and landscaping. These construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, and soil disturbance) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM₁₀ and PM_{2.5} emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_x, CO, PM₁₀, and PM_{2.5}. Construction emissions can vary substantially from day to day depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions.

Proposed project construction emissions were estimated using a combination of CalEEMod default assumptions and information provided by the project engineer. It was assumed that approximately 3,980 cubic yards of soil would be exported during reservoir excavation. In addition, demolition of the existing asphalt pavement and concrete sidewalks was estimated to result in approximately 141 tons of material that would be hauled off site. Air quality emissions modeling assumed that construction of the project would commence in October 2026 and would last approximately 14 months. Default values for horsepower and load factor provided in CalEEMod were used for all construction equipment, and the equipment mix was provided by the project engineer. For the analysis, it was generally assumed that heavy-duty construction equipment would be operating at the site 5 days per week, up to a maximum of 8 hours per day. It was assumed that some construction phases would overlap. Construction modeling assumptions are provided in Table 3.3-2.

Table 3.3-2. Construction Scenario Assumptions

	Average Daily One-Way Vehicle Trips			Equipment			
Construction Phase	Worker Trips	Vendor Truck Trips	Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours	
Demolition of existing	18	4	4	Rubber Tired Dozers	2	8	
field and structures				Skid Steer Loader	1	8	

Table 3.3-2. Construction Scenario Assumptions

	Average Daily One-Way Vehicle Trips			Equipment			
Construction Phase	Worker Trips	Vendor Truck Trips	Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours	
				Graders	2	8	
Site preparation, clearing	26	4	4	Rubber Tired Dozers	3	8	
and grubbing				Jack Hammers	1	8	
				Tractors/Loaders/Backhoes	4	8	
Reservoir excavation	24	4	8	Rubber Tired Dozers	2	8	
				Skid Steer Loaders	2	8	
				Tractors/Loaders/Backhoes	3	8	
Reservoir construction	14	2	0	Cranes	1	8	
				Rubber Tired Dozers	2	8	
				Skid Steer Loaders	2	8	
Installation of pipe,	18	2	4	Cranes	1	8	
diversion structures, pre-				Trenchers	2	8	
treatment facility, pump, and bioswale overflow inlet				Skid Steer Loaders	2	8	
Outlet line	18	4	0	Rubber Tired Dozers	2	8	
				Skid Steer Loaders	2	8	
				Tractors/Loaders/Backhoes	3	8	
Field replacement,	26	2	0	Graders	1	8	
bioswale				Skid Steer Loaders	1	8	
planting/landscaping, and other site improvements				Pavers	1	8	
other site improvements				Paving Equipment	1	8	
				Rollers	1	8	
				Turf Aerators	1	8	
				Spreader Sprayers	1	8	
				Telehandlers	1	8	
				Cement and Mortar Mixers	1	8	
				Aerial Lifts	1	8	

Notes: Appendix A, Air Quality and Greenhouse Gas Modeling.

Emissions generated during construction and operation of the project are subject to the rules and regulations of the SCAQMD. Rule 403, Fugitive Dust,⁶ requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. It was

SCAQMD Rule 403 requires implementation of various best available fugitive dust control measures for different sources for all construction activity sources within its jurisdictional boundaries. Dust control measures include, but are not limited to, maintaining stability of soil through pre-watering of site prior to clearing, grubbing, cut and fill, and earth-moving activities; stabilizing soil during and immediately after clearing, grubbing, cut and fill, and other earth-moving activities; stabilizing backfill during handling and at completion of activity; and pre-watering material prior to truck loading and ensuring that freeboard exceeds 6 inches. Although SCAQMD Rule 403 requires fugitive dust control beyond watering control measures, compliance with Rule 403 is represented in CalEEMod by assuming twice daily watering of active sites (61% reduction in PM₁₀ and PM_{2.5} [CAPCOA 2022]).

assumed that the active sites would be watered at least two times daily, resulting in an approximately 61% reduction of fugitive dust (CalEEMod default value), to represent compliance with SCAQMD standard dust control measures in Rule 403.

CalEEMod calculates maximum daily emissions for summer and winter periods. As such, the estimated maximum daily construction emissions for both summer and winter periods are summarized in Table 3.3-3. Detailed construction model outputs are presented in Appendix A, Air Quality and Greenhouse Gas Modeling.

Table 3.3-3. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions - Unmitigated

	voc	NOx	СО	SO _x	PM ₁₀	PM _{2.5}	
Year	Pounds per Day						
Summer							
2027	4.59	42.41	49.22	0.08	7.36	4.34	
Winter							
2026	6.04	54.66	55.69	0.10	10.66	6.26	
2027	4.58	42.46	44.07	0.08	7.36	4.34	
Maximum Daily Emissions	6.04	54.66	55.69	0.10	10.66	6.26	
SCAQMD Threshold	75	100	550	150	150	55	
Threshold Exceeded?	No	No	No	No	No	No	

Source: Appendix A, Air Quality and Greenhouse Gas Modeling.

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

Emissions estimates include watering of the active sites two times per day per Rule 403 compliance.

As shown in Table 3.3-3, the proposed project's maximum daily construction emissions would not exceed SCAQMD thresholds for any criteria pollutant and impacts would be less than significant.

Operational Emissions

The first full year of project operations would be in 2028. Once construction is complete, project operation is anticipated to entail routine maintenance performed by the City at the stormwater capture facility and other park features. Reservoir maintenance would entail removal of debris and pollutant constituents from the treatment devices, pump testing and calibration, and cleaning the storage reservoir. During long-term operations, the project would generate air pollutants from mobile sources, including maintenance workers accessing the site, and area sources, including consumer products and architectural coatings. CalEEMod was used to estimate emissions from these sources. Table 3.3-4 summarizes the maximum daily emissions of criteria pollutants that would be generated by the proposed project and compares the emissions to the SCAQMD's operational thresholds.

Table 3.3-4. Estimated Maximum Daily Operational Criteria Air Pollutant **Emissions - Unmitigated**

	voc	NOx	СО	SO _x	PM ₁₀	PM _{2.5}		
Source	Pounds per	Pounds per Day						
Summer								
Mobile	0.01	0.01	0.18	<0.01	0.05	0.01		
Area	0.01	0.00	0.00	0.00	0.00	0.00		
Total	0.02	0.01	0.18	<0.01	0.05	0.01		
Winter								
Mobile	0.01	0.02	0.16	<0.01	0.05	0.01		
Area	<0.01	0.00	0.00	0.00	0.00	0.00		
Total	0.01	0.02	0.16	<0.01	0.05	0.01		
SCAQMD Threshold	55	55	550	150	150	55		
Threshold Exceeded?	No	No	No	No	No	No		

Source: Appendix A, Air Quality and Greenhouse Gas Modeling.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM₂₅ = fine particulate matter; <0.01 = value is less than 0.005; SCAOMD = South Coast Air Quality Management District.

As shown in Table 3.3-4, the proposed project's maximum daily operational emissions would not exceed SCAOMD thresholds for any criteria pollutant and impacts would be less than significant.

Cumulative Impacts

Cumulative localized impacts would potentially occur if a project were to occur concurrently with another off-site project. Schedules for potential future projects near the project area are currently unknown; therefore, potential impacts associated with two or more simultaneous projects would be considered speculative.7 However, the project is located in an already developed urban area and any future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM10 and PM2.5 emissions would be reduced because all future projects would be subject to SCAQMD Rule 403, Fugitive Dust, which sets forth general and specific requirements for all sites in the SCAQMD.

Therefore, the proposed project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants and impacts would be less than significant during construction and operation.

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

Less-than-Significant Impact with Mitigation Incorporated. Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare

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The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

The closest off-site sensitive receptors to the project site are single-family residences adjacent to the south and west of the project site, Bonita Street Elementary School adjacent to the northwest of the project site, and Carnegie Middle School adjacent to the north of the project site.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate the potential of localized air quality impacts to sensitive receptors in the immediate vicinity of a proposed project from construction and operation; however, an operational LST analysis is not required for the project due to no substantial on-site sources of localized emissions. For projects that disturb 5 acres or less per day, the SCAQMD *Final Localized Significance Threshold Methodology* (SCAQMD 2008a) includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for NO₂, CO, PM₁₀, and PM_{2.5}) without performing project-specific dispersion modeling.

The LST significance thresholds for NO_2 and CO represent the allowable increase in concentrations above background levels in the vicinity of a project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for PM_{10} represents compliance with Rule 403 (Fugitive Dust). The LST significance threshold for $PM_{2.5}$ is intended to ensure that construction emissions do not contribute substantially to existing exceedances of the $PM_{2.5}$ ambient air quality standards. The allowable emission rates depend on the following parameters:

- 1. Source-Receptor Area in which the project is located
- 2. Size of the project site
- 3. Distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals)

The proposed project site is located in Source-Receptor Area 4 (South Coastal LA County). The maximum number of acres disturbed on the peak day was estimated using the *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* (SCAQMD n.d.), which provides estimated acres per 8-hour per day per piece of earth-moving equipment. Based on the SCAQMD guidance, it was estimated that the maximum acres on the project site that would be disturbed by off-road equipment would be 3.5 acres per day; therefore, LSTs for a 3.5-acre disturbed area were interpolated from the SCAQMD 2- and 5-acre LST thresholds. The nearest sensitive receptor land use is located adjacent to the project site. Accordingly, the distance in the LST lookup table of 25 meters is assumed.

According to the *Final Localized Significance Threshold Methodology*, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2008a). Trucks and worker trips associated with the project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be relatively brief in nature and would cease once the vehicles pass through the main streets. Nonetheless, vehicle activity may occur within the project boundary (i.e., fence line); therefore, a small portion (i.e., 0.25 miles) of the off-site vehicle travel

for worker vehicles, vendor trucks, and haul trucks was conservatively assumed as on-site emissions for the LST analysis.

The maximum daily on-site emissions generated from construction of the proposed project are presented in Table 3.3-5 and are compared to the SCAQMD localized significance criteria to determine whether project-generated on-site emissions would result in potential LST impacts.

Table 3.3-5. Construction Localized Significance Thresholds Analysis - Unmitigated

		NO _x	со	PM ₁₀	PM _{2.5}		
Year		Pounds per Day					
Summer							
	2027	41.71	46.88	6.84	4.21		
Winter							
	2026	53.84	54.09	10.07	6.10		
	2027	41.72	42.78	6.84	4.21		
	Maximum Daily Emissions	53.84	54.09	10.07	6.10		
	SCAQMD LST Criteria ^a	102.5	1,186.0	10.5	6.5		
	Threshold exceeded?	No	No	No	No		

Source: Appendix A, Air Quality and Greenhouse Gas Modeling.

Notes: NO_x = oxides of nitrogen; CO = carbon monoxide; PM_{10} = particulate matter with a diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

The values shown are the maximum summer or winter daily emissions results from CalEEMod. The total values may not add up exactly due to rounding. Emissions estimates include watering of the active sites two times per day per Rule 403 compliance.

As shown in Table 3.3-5, proposed construction activities would not generate emissions that would exceed the site-specific LST criteria, and impacts would be less than significant.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited and disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

At the time that the SCAQMD Handbook (1993) was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to

Localized significance thresholds are shown for a 3.5-acre disturbed area for a sensitive receptor distance of 25 meters in Source-Receptor Area 4 (South Coastal LA County).

turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP8 (SCAQMD 2003) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time, the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection in 2002; the maximum 8-hour CO concentration was 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002. Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. The project's anticipated increase in trips is minimal and is not of a magnitude expected to raise the traffic volumes at intersections within proximity of the proposed project to the 100,000 vehicles per day that could result in a CO hotspot.

Additionally, ambient CO levels are monitored at the air quality monitoring station located at 700 North Bullis Road, Compton, which is approximately 6 miles northeast of the project site and represents ambient air quality in the project area. Ambient CO levels monitored at this representative monitoring station indicate that the highest recorded 1-hour concentration of CO is 3.5 ppm (the State standard is 20 ppm) and highest 8-hour concentration is 3.1 ppm (the State standard is 9 ppm) during the past 3 years of available data (EPA 2025a). As discussed above, the highest CO concentrations typically occur during peak traffic hours, so CO impacts calculated under peak traffic conditions represent a worst-case analysis. Given the considerably low level of CO concentrations in the project area, and the minimal increase in daily trips, project-related mobile emissions are not expected to contribute significantly to CO concentrations, and a CO hotspot is not anticipated to occur. Finally, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Based on these considerations, the proposed project would result in a less-than-significant impact regarding potential CO hotspots.

Toxic Air Contaminants

The greatest potential for toxic air contaminant (TAC) emissions during project construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks. Use of heavy-duty construction equipment is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions; use of diesel trucks is also subject to an Airborne Toxics Control Measure. Based on the adjacent residential and school receptors, a quantitative health risk assessment (HRA) was prepared for the project. The following discussion summarizes the dispersion modeling, HRA methodology, and results for the proposed project; supporting HRA documentation, including detailed assumptions, is presented in Appendix B.

SCAQMD has adopted a cancer risk threshold of 10 in a million (SCAQMD 2023), which indicates that a person has an additional risk of 10 chances in a million (0.001%) of developing cancer during their lifetime as a result of the air pollution scenario being evaluated. For context, the National Cancer Institute estimates

⁸ SCAQMD's CO hotspot modeling guidance has not changed since 2003.

that approximately 38.9% of people will be diagnosed with cancer during their lifetimes (National Cancer Institute 2025). The SCAQMD has also adopted a hazard index less than 1.0, below which indicates that people are not likely to experience any non-cancer health effects (SCAQMD 2023).

The SCAQMD's Modeling Guidance for American Meteorological Society/EPA Regulatory Model (AERMOD) (SCAQMD 2025a) provides guidance to perform dispersion modeling for use in HRAs within the SCAB. The cancer risk parameters for exposure to TACs, such as age-sensitivity factors, daily breathing rates, exposure period, fraction of time at home, and cancer potency factors used in the analysis herein are based on the values and data recommended by the Office of Environmental Health Hazard Assessment Air Toxics Hot Spots Program Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments 2015 (2015 Risk Assessment Guidelines Manual) (OEHHA 2015), as implemented in the Hotspots Analysis and Reporting Program Version 2 (HARP2). Accordingly, this HRA evaluates and reflects conservative, health-protective methodologies to assess health impacts to adults, as well as infants, children, and other sensitive subpopulations.

For risk assessment purposes, PM_{10} in diesel exhaust is considered DPM, originating mainly from off-road equipment operating at a defined location for a given length of time at a given distance from sensitive receptors. Less-intensive, more-dispersed emissions result from on-road vehicle exhaust (e.g., heavy-duty diesel trucks).

Air dispersion modeling was performed using the EPA's AERMOD Version 24142 modeling system (computer software) with the Lakes Environmental Software implementation/user interface, AERMOD View Version 13.0. The dispersion modeling included the use of standard regulatory default options. AERMOD parameters were selected as representative of the project site and project activities. Principal parameters of this modeling are presented in Table 3.3-6.

Table 3.3-6. American Meteorological Society/Environmental Protection Agency Regulatory Model Principal Parameters

Parameter	Details
Meteorological Data	AERMOD-specific meteorological data for the Long Beach/Daugherty Field/Airport air monitoring station (KLGB) was used for the dispersion modeling (SCAQMD 2025b). A meteorological data set from 2015-2019 was obtained from the SCAQMD in a preprocessed format suitable for use in AERMOD.
Urban versus Rural Option	Urban areas typically have more surface roughness as well as structures and low- albedo surfaces that absorb more sunlight—and thus more heat—relative to rural areas. According to SCAQMD guidelines, the urban dispersion option was selected (SCAQMD 2025a).
Terrain Characteristics	Digital elevation data were imported into AERMOD and elevations were assigned to receptors and emission sources, as necessary. Digital elevation data were obtained through the AERMOD View in the U.S. Geological Survey's National Elevation Dataset format with a resolution of 1 arc-second resolution. The elevation of the modeled site is 9.65 meters above sea level.
Source Release Characterizations	Off-road equipment and trucks were modeled as a line of adjacent volume sources across the project site with a release height of 5 meters, a plume height of 10 meters, and plume width of 10 meters (SCAQMD 2008a).

Table 3.3-6. American Meteorological Society/Environmental Protection Agency Regulatory Model Principal Parameters

Parameter	Details
Receptors	A nested grid of receptors was centered over the project site with the following resolutions:
	 20-meter spacing from the project site out to 200 meters; 50-meter spacing from 200 meters to 500 meters; 100-meter spacing from 500 meters to 1,000 meters; 200-meter spacing from 1,000 meters to 2,000 meters; 500-meter spacing from 2,000 meters to 5,000 meters.

Source: SCAQMD 2008a; SCAQMD 2025a; SCAQMD 2025b.

Notes: AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; SCAQMD = South Coast Air Quality Management District.

See Appendix B, Construction Health Risk Assessment Modeling, for complete model parameter inputs.

AERMOD was run with the line source emitting unit emissions (1 gram per second) to obtain the necessary input values for HARP2. The ground-level concentration plot files were then used to estimate the long-term cancer health risk to an individual, and the noncancerous chronic health indices. There is no reference exposure level for acute health impacts from diesel particulate matter, and, thus, acute risk was not evaluated.

Cancer risk is defined as the increase in probability (chance) of an individual developing cancer due to exposure to a carcinogenic compound, typically expressed as the increased chances in 1 million. For the construction HRA, the TAC exposure parameters are described below:

- Maximally Exposed Individual Resident (MEIR): For residential receptors during project construction
 and operation, TAC exposure was assumed to begin in the 3rd trimester of pregnancy (assumed to
 be the worst-case scenario for cancer risk) for a duration of 1.17 years (construction).
- School: For school children at Bonita Street Elementary School and Carnegie Middle School during project construction, TAC exposure was assumed to begin at 4 years old for a duration of 1.17 years (construction).

The SCAQMD has also established noncarcinogenic risk parameters for use in HRAs since some TACs increase noncancerous health risk due to long-term (chronic) exposures and some TACs increase noncancerous health risk due to short-term (acute) exposures. Chronic exposure is evaluated in the construction HRA. Noncarcinogenic risks are quantified by calculating a hazard index, expressed as the ratio between the ambient pollutant concentration and its toxicity or reference exposure level, which is a concentration at or below which health effects are not likely to occur. The chronic hazard index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. A hazard index less than 1.0 means that adverse health effects are not expected.

Results of the construction HRA without mitigation are presented in Table 3.3-7.

Table 3.3-7. Construction Health Risk Assessment Results - Unmitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Cancer Risk - MEIR	Per Million	59.8	10	Potentially Significant
Chronic Hazard Index - MEIR	Index Value	0.06	1.0	Less than Significant
Cancer Risk - School	Per Million	1.6	10	Less than Significant
Chronic Hazard Index - School	Index Value	0.01	1.0	Less than Significant

Source: Appendix B, Construction Health Risk Assessment Modeling.

Notes: CEQA = California Environmental Quality Act; MEIR = maximally exposed individual resident.

As shown in Table 3.3-7, the results of the construction HRA for the project demonstrate that the unmitigated construction DPM emissions would result in a potential maximum cancer risk at the MEIR that would exceed the 10 in a million-cancer risk threshold; however, construction DPM emissions would be below the Chronic Hazard Index threshold. Unmitigated construction DPM emissions would result in a health risk at the nearby schools that would be less than both the cancer risk threshold and the Chronic Hazard Index threshold. Therefore, TAC emissions from construction of the project would result in a potentially significant impact. Mitigation Measure (MM)-AQ-1, which requires use of Level 3 diesel particulate filters for off-road equipment to reduce DPM emissions during project construction, is detailed below.

Table 3.3-8 summarizes the results of the HRA after implementation of **MM-AQ-1** for construction of the proposed project.

Table 3.3-8. Construction Health Risk Assessment Results - Mitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Cancer Risk - MEIR	Per Million	9.0	10	Less than Significant
Chronic Hazard Index - MEIR	Index Value	0.009	1.0	Less than Significant
Cancer Risk - School	Per Million	0.02	10	Less than Significant
Chronic Hazard Index - School	Index Value	0.001	1.0	Less than Significant

Source: Appendix B, Construction Health Risk Assessment Modeling.

Note: CEQA = California Environmental Quality Act.; MEIR = maximally exposed individual resident.

Includes implementation of MM-AQ-1.

After mitigation, TAC exposure from construction diesel exhaust emissions would result in a residential cancer risk below the 10 in 1 million threshold and the Chronic Hazard Index would still be less than the 1.0 threshold. The health risk at the nearby schools would be further reduced below thresholds. Therefore, after mitigation, the project would result in a less-than-significant impact related to exposure to TAC emissions during construction.

Health Effects of Criteria Pollutants

Short-term project construction would not exceed the significance thresholds for any criteria air pollutants. In addition, long-term project operational emissions would not exceed any significance thresholds.

VOCs and NO_x are precursors to O_3 , for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O_3 include respiratory symptoms, worsening of lung

disease leading to premature death, and damage to lung tissue (CARB 2025a). The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 CAAQS/NAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to reliably and meaningfully assess this impact. However, the project would not exceed the significance thresholds for VOC or NO_x ; therefore, implementation of the project would contribute minimally to regional O_3 concentrations and the associated health effects.

Health effects associated with NO_x and NO_2 (which is a constituent of NO_x) include lung irritation and enhanced allergic responses (CARB 2025b). However, because project-generated NO_x emissions would not exceed the significance threshold during construction or operations, the project would not result in potential health effects associated with NO_2 and NO_x .

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2025c). CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots were discussed previously and are determined to be a less-than-significant impact. Thus, the project's CO emissions would not contribute to significant health effects associated with this pollutant.

Health effects associated with particulate matter include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2025d). Construction of the project would not exceed the LSTs for $PM_{2.5}$ and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter or obstruct the SCAB from coming into attainment for these pollutants. Due to the minimal contribution of particulate matter during construction and operation, the project is not anticipated to result in health effects associated with PM_{10} or $PM_{2.5}$.

In summary, because implementation of the project would not result in exceedances of the SCAQMD significance thresholds during construction and operation, the potential health effects associated with criteria air pollutants are considered **less than significant with mitigation incorporated**.

- MM-AQ-1 Construction Equipment Diesel Particulate Exhaust Minimization. Prior to the start of construction activities and issuance of grading permits, the City or its designee shall ensure that all diesel-powered construction equipment is equipped with a California Air Resources Board (CARB)-certified Level 3 diesel particulate filter or better.
- d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less-than-Significant Impact. Based on available information, the project is not anticipated to result in other emissions that have not been addressed under Section 3.3(a) through Section 3.3(c). As such, this analysis focuses on the potential for the project to generate odors.

The analysis of other emissions is focused on the potential for an odor impact to occur. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of the receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). The project does not propose and would not engage in any of these activities or other potential activities that would generate operational odors. The project entails construction of a stormwater capture and treatment facility and improvements to an existing park and would not create any new sources of odors during operation. Therefore, the project would result in an odor impact that is **less than significant.**

3.4 Biological Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV.	BIOLOGICAL RESOURCES - Would the project	:	,	,	
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				

		Potentially Significant Impact	Less Than Significant Impact With 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 a tree preservation policy or ordinance?				
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?				\boxtimes

The following analysis relies on a biological resources assessment utilizing the most recent relevant literature, published research, maps, soil data, biological baseline information, special-status habitats, and species distribution data to assess the potential for biological resources to occur within the project site and a surrounding 100-foot buffer (the study area).

The analysis included a review of the California Department of Fish and Wildlife's California Natural Diversity Database (CDFW 2025a), the California Native Plant Society's Inventory of Rare and Endangered Plants (CNPS 2025), and the U.S. Fish and Wildlife Service's Information for Planning and Consultation (IPaC; USFWS 2025a). These sources were queried based on the U.S. Geological Survey (USGS) 7.5-minute Torrance quadrangle and the surrounding eight quadrangles (San Pedro, Redondo Beach, Venice, Inglewood, South Gate, and Long Beach).

Potential and/or historic drainages and aquatic features were evaluated through review of USGS 1:24,000-scale topographic maps, aerial imagery, the National Wetland Inventory database (USFWS 2025b), and the Natural Resources Conservation Service Web Soil Survey (USDA 2025).

Under existing conditions, the entirety of the project site consists of developed land, including partially paved surfaces and buildings. Medium to Large non-native ornamental trees are also present throughout the site.

Field Visit

Dudek biologist Eilleen Salas performed a field survey on February 10, 2025. Temperatures during the survey were between 56°F and 57°F, with 80% cloud cover, and wind speeds ranging between 4 mph and 5 mph. The biological survey included vegetation mapping, the mapping of sensitive biological resources (if present) within the project site plus survey buffer (biological study area), and an evaluation of the potential for special-status species to occur. Photograph documentation is provided in Appendix C, Biological Resources Species List.

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

Less than Significant with Mitigation Incorporated. There are 48 special-status plant species and 32 special-status wildlife species with recorded occurrences in the U.S. Geologic Survey's Torrance, California 7.5-minute topographic quadrangle, in which the project is located, and surrounding eight quadrangles (CDFW 2025a; CNPS 2025; USFWS 2025a). The biological study area supports three land cover types (ornamental plantings, parks, and urban/developed), as shown on Figure 4, Vegetation Communities and Land Cover Types. Plant species observed within the site generally consisted of non-native ornamental species including tree of heaven (*Ailanthus altissima*), canary island pine (*Pinus canariensis*) London plane tree (*Platanus acerifolia*), and Bermuda grass (*Cynodon dactylon*). No special-status plants or wildlife were found to have a potential to occur due to the lack of suitable habitat (see Appendix C, Biological Resources Species List, to this MND). Wildlife species observed during the biological resources survey include common avian species found in urbanized settings such as American crow (*Corvus brachyrhynchos*), black phoebe (*Sayornis nigricans*), Anna's hummingbird (*Calypte anna*), and house finch (*Haemorhous mexicanus*).

Due to the presence of ornamental trees on the project site that can support nesting for a variety of common, native, and migratory birds, the project may result in significant direct or indirect impacts to nesting birds if project activities occur during the avian nesting season of February through August. To reduce the project's potential impacts on nesting birds to a less-than-significant level, **MM-BIO-1** recommends nesting season avoidance and pre-project nesting bird surveys if the nesting season cannot be avoided.

- MM-BIO-1 Nesting Bird Avoidance. The project should avoid the avian nesting season to reduce all potential impacts to protected birds and their nests. In the event the project must commence during the nesting season (February August), a pre-construction nesting survey should be conducted within 3 days prior to ground disturbing activities to determine the presence/absence of nesting birds. If an active nest is found on the study area, a qualified biologist will establish a buffer around the nest (up to 500 feet for raptors and 300 feet for passerine birds) and ongoing biological monitoring during construction may be required until the nestlings have fledged and the nest is no longer active. The buffer will be established by a biologist based on the sensitivity of the species to disturbance and the proximity to project activities. Construction activities may commence outside of the buffer under the discretion of a monitoring biologist. Once the monitoring biologist has determined the nest is no longer active, the buffer can be removed, and construction may continue.
- 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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The proposed project site is within a highly developed and urbanized area lacking natural or native vegetation communities. There are no riparian habitats or other sensitive natural communities identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service that were identified on the project site. As such, impacts to

these biological resources would not occur as a result of the project. Therefore, the project would have **no impacts** to riparian habitats or other sensitive natural communities.

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

No Impact. The project site is developed and urbanized with no riparian habitat present. No permanent or ephemeral natural drainages or watercourses, water bodies, or other resources associated with wetland and non-wetland waters are located on the project site. The project site does not contain any federal jurisdictional wetlands or support any aquatic resources regulated by the U.S. Army Corps of Engineers, Los Angeles Regional Water Quality Control Board, or California Department of Fish and Wildlife as jurisdictional waters of the United States or waters of the state. Therefore, **no impacts** associated with state or federally protected wetlands would occur.

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. Meffe and Carrol (1997) define wildlife movement corridors, also referred to as dispersal corridors or landscape linkages, as linear features along which animals can travel from one habitat or resource area to another. According to the California Natural Diversity Database search, the project site does not contain any greenbelts for wildlife movement or native vegetation capable of supporting the movement of wildlife, particularly corridors that facilitate movement of species between larger stands of native habitat. The proposed project is within a highly urbanized area lacking habitat that could provide opportunities for wildlife movement. Construction of the proposed project would not result in encroaching onto or impeding the use of a wildlife corridor or nursery site that local wildlife could use. Therefore, the proposed project would have **no impact** on wildlife movement corridors or wildlife nursery sites.

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

No Impact. The removal of City-owned trees or shrubs that occur within the public right-of-way would be required to comply with all applicable provisions in the City of Carson's Tree Preservation and Protection Ordinance. However, the proposed project does not include the removal of any trees within the Study Area. Therefore, **no impacts** associated with local policies or ordinances would occur.

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. The biological study area is not within any habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan (CDFW 2019). As such, the project would not conflict with the provisions of an adopted conservation plan and **no impact** would occur.

3.5 Cultural Resources

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

The analysis contained within this section is based on the Cultural Resources Inventory Report prepared for the project by Dudek in April 2025 (Appendix D).

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

No Impact. Historic-age structures are those that are built more than 45 years ago and, therefore, have the potential to be considered historical resources pursuant to Section 15064.5 of the CEQA Guidelines. While some historical resources are also considered archaeological resources, such resources are addressed in Section 2.5(b), as part of the discussion of archaeological resources.

No historical resources were identified in the project site based on the analysis of historic aerial photographs (1952–2022), historic topographic maps (1886–2021), or archival background research (NETR 2025). In its current extent, the baseball/softball fields, tennis courts, and associated structures do not meet the minimum age threshold to be considered an historical resource under CEQA.

On December 19, 2024, Dudek conducted a records search of the California Historical Resources Information System (CHRIS) database at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton, in Fullerton, California. The records search results identified a total of 17 previous cultural resources studies that have been conducted within 1 mile of the project (Table 3.5-1); one cultural resource inventory (LA-04512) covers the entirety of the project site.

Report LA-04512 is a Cultural Resources Inventory of the City of Carson, California (Appendix D) that documents the results of an inventory and evaluation of the cultural heritage resources located within the bounds of the City of Carson. The report was drafted by A.V. Eggers, consulting archaeologist, and consisted of an archival records search, literature review, pedestrian survey, data evaluation and report preparation. The study area overlaps 100% with the project site. During the pedestrian survey, 8 prehistoric resources were recorded, and 15 historic-era resources were recorded or updated. Three of the cultural resources

identified in support of this project fall within the records search 1-mile radius of the currently proposed project. No project-specific management recommendations were proposed for areas adjacent to Calas Park or the other currently proposed work areas but instead reiterated current regulations regarding the treatment of cultural resources.

Table 3.5.1. Previous Technical Studies Within 1 Mile of the Project Site

Report ID	Year	Author	Title
Intersects Pr	oject Site		
LA-04512	1977	Eggers, A.V.	Cultural Resources Inventory of the City of Carson, California
Outside of Pr	roject Site		
LA-00083	1975	Rosen, Martin D.	Evaluation of the Archaeological Resources and Potential Impact of the Joint Outfall System's Improvements on Sewer Treatment Plants and Installation Routes for New Large Diameter Sewers, Los Angeles County
LA-02258	1991	Breece, William H.	Archaeological Survey Results: Proposed Oil Shell Oil Company Inter-Refinery Pipelines Project Carson, California
LA-02749	1992	Charroin, Andrea	Archaeological Monitoring for Shell Pipeline
LA-02751	1992	Padon, Beth	Archaeological Survey Results: Proposed Arco Los Angeles Refinery Clean Fuels Project Carson, California
LA-05971	2001	Unknown	California Energy Commission Application for Certification BP 5th Train Project City of Carson, Los Angeles County, California
LA-05995	2002	Duke, Curt	Cultural Resource Assessment AT&T Wireless Services Facility No. 05226a Los Angeles County, California
LA-06367	2001	Duke, Curt	(Duplicate of LA-5438) Cultural Resource Assessment Cingular Wireless Facility No. Vy030-04 Los Angeles County, California
LA-09627	2008	Wlodarski, Robert J.	Proposed Bechtel Wireless Telecommunications Site OC0195 (C & H Printing), Located at 6046 Lincoln Avenue, Cypress, California 90630
LA-10158	2007	Knell, Edward J., and James Steely	Cultural Resources Survey for the Carson Terminal Redevelopment Project, Los Angeles County, California
LA-10250	2009	Bonner, Wayne H.	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA33769B (Ranch Fish Market), 117 East 223rd Street, Carson, Los Angeles County, California
LA-10567	2005	Hogan, Michael, Bai "Tom" Tang, Josh Smallwood, Laura Hensley Shaker, and Casey Tibbitt	Identification and Evaluation of Historic Properties - West Basin Municipal Water District Harbor- South Bay Water Recycling Project Proposed Project Laterals
LA-10727	2010	Bonner, Wayne H.	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA33769-C (Ranch Fish Market), 117 East 223rd Street, Carson, Los Angeles County, California

Table 3.5.1. Previous Technical Studies Within 1 Mile of the Project Site

Report ID	Year	Author	Title
LA-11150	2003	Maxwell, Pamela	West Basin Municipal Water District Harbor/ South Bay Water Recycling Project
LA-11482	1939	Racer, F.H.	Camp Sites in Harbor District - F.H. Racer
LA-11513	2011	Meyer, Donna M.	City of Carson Seismic Retrofit of Carson Senior High School. HMGP 1731-71-54, Finding of No Historic Properties
LA-12983	2014	Tang, Bai	Evaluation of Potential Historical Resource Carson Station, Los Angeles County Sheriff's Department Los Angeles County, California UltraSystems Environmental Project No. 5933

Source: Appendix D, Calas Park Cultural Resources Inventory Report.

The CHRIS records search results identified five previously recorded cultural resources within a 1-mile radius of the project site, and none of these resources are located within or are adjacent to the project site (Table 3.5.2).

Table 3.5-2. Previously Recorded Cultural Resources Within 1 Mile of the Project Area

Primary Number	Trinomial	Age	Description	CRHR Eligibility
Outside of Pro	oject Area			
P-19-000098	CA-LAN- 000098	Prehistoric	Suangna Native American Village	County Point of Historical Interest (1972)
P-19-000795	CA-LAN- 000795	Prehistoric	Lithic scatter with shell, bone, and diagnostic artifacts	Not Evaluated
P-19-188395		Historic	Carson Terminal, Shell Oil Company	Recommended Not Eligible
P-19-189309		Historic	Carson Standpipes	Not Evaluated
P-19-189868		Historic	Carson Senior High School	Recommended Not Eligible

Source: Appendix D, Calas Park Cultural Resources Inventory Report.

Note: CRHR = California Register of Historic Resources.

Dudek Archaeologist Ryan Glenn, MA, RPA, conducted a reconnaissance-level pedestrian survey of the project site on January 17, 2025. The pedestrian survey employed standard archaeological procedures and techniques consistent with the Secretary of the Interior's Standards for an archaeological resources inventory. Wherever possible, the survey was conducted in parallel transects, spaced no more than 5 meters apart. Due to the majority of the project site being fully developed with paved parking lots and existing structures, an opportunistic method of examining any visible ground surface was required. Where visible, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock, imported marine shell), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic

artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as rodent/reptile burrows and drainages were also visually inspected for exposed subsurface materials.

When the survey was conducted, the project site was more than 40% developed and covered with either pavement or buildings. Ground surface visibility within the existing project site was variable, with none to fair visibility. Areas that provided some surface visibility included landscaped areas around and within the parking lot, open space south of the parking lot, and the baseball/softball diamonds measuring approximately 98 meters by 122 meters. These areas contained both areas with no vegetation and areas with dense grasses and provided fair to good ground surface visibility. No cultural resources were identified during the pedestrian survey of the project site. As such, there would be **no impact.**

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated. The analysis of project impacts on archaeological resources is primarily based on the results of the SCCIC records search, review of historic maps and aerial images, and the pedestrian survey. A review of the historic aerials reveals that the project site has undergone ground-disturbing activities to create and maintain the baseball/softball fields, tennis courts, parking lot, and associated structures over the last 40 years. Prior to that, the project site underwent ground-disturbing activities to support a containment pond, and structures utilized for staging of used cars and other equipment (NETR 2025).

Dudek contacted the Native American Heritage Commission (NAHC) on January 30, 2025, and requested a review of their Sacred Lands File (SLF) for the proposed project site. The SLF consists of a database of known Native American cultural resources. These resources may not be included in the SCCIC database and depicted in the records search results. The NAHC replied via email correspondence on February 11, 2025, stating that the SLF search was completed with negative results. The NAHC additionally provided a list of Native American individuals and/or tribal organizations that should be contacted for more information on potential tribal sensitivities regarding the currently proposed project.

Based on the negative results of the SCCIC records search, NAHC SLF request, and pedestrian survey, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. However, there are previously recorded prehistoric resources located within the 1-mile record search radius and due to the landscaping and grading that has occurred because of the development of the park it is difficult to determine the presence or absence of subsurface archaeological deposits based on surface observations. Additionally, based on the results of the geotechnical analysis there is a possibility of encountering intact foundations over 50 years in age and the presence of alluvium, which has a moderate potential for supporting the presence of subsurface archaeological deposits. Therefore, the following mitigation measures, MM-CUL-1, MM-CUL-2, and MM-CUL-3, are recommended to ensure that the potential for impacts to unknown archaeological resources would be appropriately addressed and reduced to less-than-significant levels.

MM-CUL-1 Archaeological Monitoring. Prior to ground disturbance activities, the City and/or subsequent responsible parties should retain a Principal Investigator/Archaeologist, meeting the Secretary of the Interior's Standards, and with experience in California prehistoric and historic resources (experience within Los Angeles County preferred), to

complete the following: compose a Cultural Resource Monitoring and Inadvertent Discovery Plan (Plan), manage archaeological monitoring, and address any inadvertent discoveries identified during project implementation. Proof of retainment of the Principal Investigator/Archaeologist should be provided to the City prior to the granting of a grading permit. The purpose of the Plan is to outline cultural monitoring (archaeological and Native American/tribal) protocols and a program of treatment and mitigation in the case of an inadvertent discovery of cultural (archaeological or Native American/tribal) resources during ground-disturbing phases and to provide for the proper identification, evaluation, treatment, and protection of any cultural resources in accordance with CEQA throughout the duration of the project. Existence and importance of adherence to this Plan should be stated on all project site plans intended for use by those conducting the ground-disturbing activities.

The Principal Investigator/Archaeologist should manage archaeological monitoring conducted by archaeological technicians during initial ground disturbances. Initial excavation is defined as initial construction-related earth moving of sediments from their place of deposition. As it pertains to cultural monitoring (archaeological or Native American/tribal), this definition excludes movement of sediments after they have been initially disturbed or displaced by project-related construction. The retained Principal Investigator/Archaeologist should oversee and establish monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. Project monitoring may be adjusted based on observed surface conditions if sediments appear unlikely to contain buried intact cultural resources. The archaeological monitor should be responsible for maintaining daily monitoring logs. The requirement for archaeological monitoring should be noted on all construction plans to ensure implementation. Upon completion of all ground-disturbing activities, an archaeological monitoring report should be prepared within 60 days following completion of ground disturbance and submitted to the City for review. This report should document compliance with approved cultural mitigation, all monitoring efforts, and include an appendix with daily monitoring logs. The final report should be submitted to the City and the South Central Coastal Information Center.

MM-CUL-2

Workers Environmental Awareness Program (WEAP) Training. All construction personnel and monitors who are not trained archaeologists should be briefed regarding unanticipated discoveries prior to the start of ground-disturbing activities. A basic presentation should be prepared and presented by a qualified archaeologist to inform all personnel working on the project about the archaeological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant cultural (archaeological or Native American/tribal) resources. Each worker should also be instructed on the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the on-call archaeologist and if appropriate, tribal

representative. Necessity of training attendance should be stated on all project site plans intended for use by those conducting the ground-disturbing activities.

MM-CUL-3

Unanticipated Discovery of Archaeological Resources. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find. Construction activities may continue in other areas but should be redirected a safe distance from the find. If the new discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. A data recovery plan shall be developed by the qualified archaeologist in consultation with the City and Native American representatives, if applicable. Ground disturbance can continue only after the resources has been properly mitigated and with approval by the City.

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

Less Than Significant Impact. As discussed above, the project site has undergone maintenance and modification over the past 70+ years of operation. No prehistoric or historic-period burials, including those interred outside of formal cemeteries, were identified within the project site as a result of the CHRIS records search, NAHC SLF search, or archival background research. Based on the results of the previous research and ground-disturbing activities, the potential for human remains to exist within the project site is considered unlikely. However, it is possible that unknown human remains could be encountered during ground disturbance activities associated with project construction.

In the event that human remains are inadvertently encountered during construction activities, the remains and associated resources must be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby area (within 100 feet of the find) reasonably suspected to overlie adjacent remains must occur until the County Coroner has determined if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to immediately notify the NAHC. The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must then complete their inspection and determine, in consultation with the property owner, the treatment and disposition of the human remains. Therefore, compliance with state and local regulations identified above would ensure that the project would result in a less-than-significant impact related to the inadvertent disturbance of any human remains.

3.6 Energy

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

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

Less-than-Significant Impact. Project implementation would result in energy use for construction and operation, including use of electricity and petroleum-based fuels. The following analysis evaluates the potential wasteful, inefficient, or unnecessary consumption of these energy sources during construction and operation.

Construction Energy Use

Electricity

Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities would require electricity, including conveying water that would be used for dust control (supply and conveyance), powering any necessary lighting or electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Natural Gas

There would be no natural gas used during construction. Equipment and vehicles would be powered by petroleum-based fuels as discussed below. Therefore, the use of natural gas during project construction would not be wasteful, inefficient, or unnecessary.

Petroleum-Based Fuels

Construction of the project would consume energy resources as a result of the use of heavy-duty construction equipment, on-road delivery and haul trucks, and workers commuting to and from the project site. Petroleum emissions associated with the use of construction equipment and vehicles, which were

used to calculate gallons of petroleum consumed, were calculated using CalEEMod and are provided in Appendix C, Biological Resources Species List. Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO_2) emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton (MT) CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per MT CO_2 per gallon (The Climate Registry 2025). The estimated fuel usage from construction of the project is shown in Table 3.6-1.

Table 3.6-1. Total Proposed Project Construction Petroleum Demand

	Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
Scenario	Gallons			
Project Construction	58,192	3,444	1,156	3,594
	66,386			

Source: Appendix E, Energy Calculations.

In summary, construction associated with the development of the project is estimated to consume a total of approximately 66,386 gallons of petroleum. The project would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements.

Overall, while construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. Further, the petroleum consumed related to construction would be typical of construction projects of similar types and sizes and would not necessitate new petroleum resources beyond what are typically consumed in California. Therefore, because petroleum use during project construction would be temporary and minimal and would not be wasteful or inefficient, impacts would be **less than significant**.

Operational Energy Use

Once construction is complete, operation of the proposed project would involve routine maintenance activities performed by the City. The proposed park improvements would not expand the footprint of the park or result in a major expansion of facilities that would induce substantial demand or park users. Overall, the project would result in minimal energy consumption during operation.

Petroleum fuel consumption associated with motor vehicles is a function of the vehicle miles traveled (VMT) and fuel efficiency. Utilizing the same methodology for construction petroleum use, operation of the project would lead to an incremental increase of approximately 159 gallons of diesel and 720 gallons of gasoline per year for a total of 879 gallons of petroleum per year. By comparison, Los Angeles County consumed

approximately 2.3 billion gallons of gasoline in 2022 (CEC 2025a). The energy used for maintenance purposes would be minimal and would decrease over time, as staff vehicles and equipment become increasingly efficient, as there are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted a new approach to passenger vehicles by combining the control of smog-causing pollutants and greenhouse gas (GHG) emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California (CARB 2025e).

Electricity consumption from the operation of electric pumps would be approximately 86,585 kilowatt-hours (kWh) per year. For context, local electricity demand in Los Angeles County was approximately 68 billion kWh in 2022 (CEC 2025b). Overall, the increase in electricity demand would be minimal and would not be considered inefficient, wasteful, or unnecessary, and impacts would be less than significant. As such, the project's operational energy use would be less than significant.

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

Less-than-Significant Impact. The project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR Part 6 and Part 11), where applicable. These energy efficiency standards are reviewed every 3 years by the Building Standards Commission and the California Energy Commission and are revised if necessary (PRC Section 25402[b][1]). Part 6 of Title 24 establishes energy efficiency standards for non-residential buildings constructed in California in order to reduce energy demand and consumption. Part 11 of Title 24 sets forth voluntary and mandatory energy measures that are applicable to the project under the California Green Building Standards. Overall, impacts related to the project's potential to conflict with plans for renewable energy and energy efficiency would be **less than significant**.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS - Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
 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?			\boxtimes	
iii) Seismic-related ground failure, including liquefaction?			\boxtimes	

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
	iv) Landslides?				\boxtimes
b)	Result in substantial soil erosion or the loss of topsoil?			\boxtimes	
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				

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

and

ii) Strong seismic ground shaking?

Less-than-Significant Impact. The project site is located within a seismically active region, as is most of the Southern California region. The project would likely be exposed to seismic ground shaking at multiple points in the future. The intensity of ground shaking at any specific location within the region depends on the characteristics of the earthquakes, the distance from the earthquake epicenter, and the local geologic and soil conditions. Earthquake fault zones are delineated boundaries encompassing active faults that constitute potential hazards to structures from surface faulting or fault creep (DOC 2018).

The project site is not located within an Alquist-Priolo Earthquake Fault Zone; the nearest faults are the Avalon-Compton Fault located approximately 2.9 miles east of the project site, the Cherry Hill Fault located approximately 3.1 miles east of the project site, and the Northeast Flank Fault located approximately 5.6

miles southeast of the project site (DOC 2025b). Although the project is not located within a delineated earthquake fault zone, it is located within a seismically active region. However, project construction and operation would not increase or exacerbate the potential for fault rupture to occur. Therefore, the project would not directly or indirectly cause potential adverse effects involving rupture of a known earthquake fault, and impacts would be **less than significant**.

iii) Seismic-related ground failure, including liquefaction?

Less-than-Significant Impact. Ground failure is a secondary effect of ground shaking and can include landslides, liquefaction, lurching, and differential settlement. Liquefaction is the loss of soil strength due to seismic forces generating various types of ground failure. Liquefaction occurs when saturated and poorly consolidated granular material is shaken during an earthquake and is transformed into a fluid-like state.

According to maps obtained through the California Department of Conservation and California Geological Survey, a majority of the site is not located in a liquefaction zone except for a small portion in the northeast corner of the park (DOC 2024b). The project's geotechnical investigation determine that based on the soil types and densities encountered in borings, the potential for liquefaction and dynamic settlement at the site is considered low. Full project design would include engineering design standards associated with seismic events, including liquefaction. Standard design and construction techniques such as spread footings, mat foundations, or other design considerations would be incorporated per California Building Code requirements, minimizing hazards due to liquefaction. Therefore, impacts would be less than significant.

iv) Landslides?

No Impact. Landslides typically occur on moderate to steep slopes that are affected by such physical factors as slope height, slope steepness, shear strength, and orientation of weak layers in the underlying geologic units. The project site and surroundings are generally flat with soils stabilized by development and landscaping. The project would not result in the creation of moderate to steep slopes that may become susceptible to landslides. As such, **no impact** would occur.

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

Less-than-Significant Impact. Construction of the project would require earthwork activities that could potentially contribute to soil erosion or loss of topsoil. Construction of the project would result in more than 1 acre of land disturbance; therefore, a site-specific SWPPP in accordance with State Water Resources Control Board Order No. 2009 0008 DWQ, National Pollutant Discharge Elimination System General Permit No. CAS00002 (Construction General Permit), amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ, would be prepared and implemented during project construction. One of the purposes of the SWPPP is to address potential pollutants and their sources, including sources of sediment and site erosion. Conditions of these existing regulations would include adherence to sediment and stormwater pollutant control BMPs, such as covering of exposed soil stockpiles, sediment barriers, storm drain protection, and various other measures designed to minimize potential for soil erosion and loss of topsoil. Disturbed areas would be returned to existing conditions or stabilized by new field replacement, asphalt, or landscape plantings. Operation of the proposed stormwater capture and treatment facility would not

affect erosion. Therefore, the project would not result in substantial soil erosion of the loss of topsoil and impacts would be **less than significant**.

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

Less-than-Significant Impact. As previously discussed, the project site does not contain soils susceptible to liquefaction. Full project design would include continued geotechnical investigations to inform final design and construction of the project relative to minimization of potential geotechnical risks, including soil stability, per applicable California Building Code requirements. Therefore, the project would not exacerbate geotechnical hazards related to unstable soils and impacts would be **less the significant**.

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

Less-than-Significant Impact. Expansive soils are clay-based and tend to increase in volume due to water absorption and decrease in water volume due to drying. Full project design would include continued geotechnical investigations including sampling and analysis of soils on site. If such conditions are encountered, the project would employ standard engineering protocols to limit the potential effects on project-related infrastructure. Therefore, impacts would be **less than significant**.

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

No Impact. The project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, **no impact** would occur.

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

Less-than-Significant Impact with Mitigation. Paleontological resources are the remains or traces of plants and animals that are preserved in Earth's crust, and per the Society of Vertebrate Paleontology (SVP 2010) guidelines, are older than written history or older than approximately 5,000 years, which approximates the middle Holocene. They are limited, nonrenewable resources of scientific and educational value, which are afforded protection under state laws and regulations.

According to surficial geologic mapping by Dibblee et al. (1999) at a scale of 1:24,000 and by Saucedo et al. (2016) at a scale of 1:100,000, and the geologic time scale of Cohen et al. (2024), the project site is underlain by late Holocene (present to 4,200 years ago) alluvium (map unit Qa) and early Holocene (8,200 to 11,700 years ago) alluvium that has been slightly elevated and dissected (map unit Qae). Saucedo et al. (2016) shows the area underlain by early Holocene to late Pleistocene (8,200 to 129,000 years ago) young alluvial fan deposits, undivided (map unit Qyf) and late Pleistocene (11,700 to 129,000 years ago) old alluvium, undivided (map unit Qoa). Geotechnical borings conducted by Ninyo & Moore (2025) show alluvium underlying fill. At approximately 7.5 feet below ground surface, small amounts of caliche were encountered within several boreholes, which may be an indicator of older (e.g., Pleistocene age) sediments. Fill was generally encountered to a depth of approximately 2.5 feet and up to 6 feet below the ground

surface (bgs) in one borehole. The retention basin has an anticipated excavation of up to 20 feet bgs, pipelines up to 10 feet of excavation, and bioswales up to 5 feet of excavation (Ninyo & Moore 2025).

Dudek requested a paleontological records search from the Natural History Museum of Los Angeles County (NHMLA) on December 6, 2024, and the results were received on March 9, 2025. The NHMLA reported no vertebrate fossil localities from within the proposed project site; however, they did nearby localities from similar sediments that likely underlie the project site on the surface and at depth. Nearby localities reported by the NHMLA are as follows (closest locality listed first): LACM VP 4129, approximately 1.15 miles southeast of the project site, yielded a camel and a proboscidean (e.g., mammoths and mastodons) from 24 feet bgs; LACM VP 3319, approximately 1.73 miles northeast of the project site, produced a mammoth from 30 feet bgs; LACM IP 4788/4806/20338, approximately 2.22 miles southwest of the project site, yielded invertebrates; and LACM IP 21125, approximately 2.93 miles northwest of the project site, produced invertebrates. All localities were found in Pleistocene age sedimentary deposits (unnamed Quaternary sedimentary deposits and the San Pedro Formation (NHMLA 2025- Confidential Appendix F). The San Pedro Formation likely underlies the project site at an undetermined depth bgs.

A search of online paleontological databases and previous localities reported for other projects in the area produced three nearby localities, all from the Palos Verdes Sand, which is not anticipated to be impacted based on anticipated construction plans for the project. Fossil locality LACM IP 129, approximately 2.01 miles south/southwest, produced invertebrates from 20 feet bgs; LACM VP 3085 and LACM IP 77, approximately 2.31 miles southwest, included fish, rays, a toothed whale, and invertebrates; CIT 484, approximately 2.84 miles northwest, produced a fossil seal (PBDB 2025; NHMLA 2025).

No paleontological resources were identified within the project site as a result of the institutional records search or desktop geological and paleontological review. In addition, the project site is not anticipated to be underlain by unique geologic features. Areas of the project site underlain by Holocene age deposits have low paleontological sensitivity increasing to high sensitivity with depth, where middle Holocene and Pleistocene age deposits have high paleontological sensitivity. If intact paleontological resources are discovered on site, ground-disturbing activities associated with construction of the project have the potential to destroy a unique paleontological resource or site. As such, the project site is considered to be potentially sensitive for paleontological resources, and without mitigation, the potential damage to paleontological resources during construction associated with the project is considered a potentially significant impact. With the implementation of MM-GEO-1, impacts would be reduced to a less-than-significant level.

MM-GEO-1

Prior to commencement of any grading activity on site, the City shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) (2010) guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the SVP (2010) guidelines and should outline requirements for preconstruction meeting attendance and worker environmental awareness training; where monitoring is required within the proposed project site based on construction plans and/or geotechnical reports; procedures for adequate paleontological monitoring and discoveries treatment; and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the preconstruction meeting and a qualified paleontological monitor shall be on site during all rough grading and other significant ground-disturbing activities (including augering) in previously

undisturbed, middle Holocene and Pleistocene age alluvial deposits. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find.

3.8 Greenhouse Gas Emissions

VIII	CDEENHOUSE CAS EMISSIONS - Would to	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. 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?				

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. GHGs are those that absorb infrared radiation (i.e., trap heat) in the Earth's atmosphere. The trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere) is referred to as the "greenhouse effect" and is a natural process that contributes to the regulation of the Earth's temperature, creating a livable environment on Earth. The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. Human activities that generate and emit GHGs into the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. This rise in temperature has led to large-scale changes to the Earth's system (e.g., temperature, precipitation, wind patterns), which are collectively referred to as climate change. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA

Guidelines Section 15364.5). The primary GHGs that would be emitted by project-related construction and operations include CO_2 , CH_4 , and N_2O_9

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO_2 ; therefore, GWP-weighted emissions are measured in MT of CO_2 equivalent (CO_2 e). The current version of CalEEMod assumes that the GWP for CH_4 is 25 (so emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

Section 15064.7(c) of the CEQA Guidelines specifies that "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." The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

As discussed in Section 3.3, Air Quality, the proposed project is located within the jurisdictional boundaries of the SCAQMD. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008b). This document, which builds on the California Air Pollution Control Officers Association's previous guidance, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD 2010). The 10,000 MT CO2e per-year threshold, which was derived from GHG reduction targets established in Executive Order S-3-05, was based on the conclusion that the threshold was consistent with achieving an emissions capture rate of 90% of all new or modified stationary source projects.

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

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⁹ Emissions of hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride are generally associated with industrial activities, including the manufacturing of electrical components and heavy-duty air conditioning units and the insulation of electrical transmission equipment (substations, power lines, and switch gears). Therefore, emissions of these GHGs were not evaluated or estimated in this analysis because the project would not include these activities or components and would not generate hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, or nitrogen trifluoride in measurable quantities.

issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

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

To determine the proposed project's potential to generate GHG emissions that would have a significant impact on the environment, its GHG emissions were compared to the SCAQMD 3,000 MT CO₂e per year screening threshold recommended for non-industrial projects.

Construction Emissions

Construction of the project would result in GHG emissions, which are primarily associated with off-road construction equipment, on-road haul and vendor trucks, and worker vehicles. The SCAQMD recommends that "construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies" (SCAQMD 2008b). CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 3.3, Air Quality. Table 3.8-1 presents the GHG emissions resulting from construction of the project. For further detail on the assumptions and results of this analysis, please refer to Appendix A, Air Quality and Greenhouse Gas Modeling.

Table 3.8-1. Estimated Annual Construction Greenhouse Gas Emissions

	CO ₂	CH ₄	N ₂ O	R	CO₂e
Year	Metric Tons				
2026	183.32	0.01	<0.01	0.02	184.61
2027	489.34	0.02	0.01	0.07	492.81
				Total	677.42
Amortized Construction Emissions (Over 30-Years)					22.58

Source: Appendix A, Air Quality and Greenhouse Gas Modeling.

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerants; CO_2e = carbon dioxide equivalent; 0.01 = value is less than 0.005.

Totals may not sum due to rounding.

As shown in Table 3.8-1, the estimated total GHG emissions during construction would be approximately 677 MT CO₂e. Estimated project-generated construction emissions amortized over 30 years would be approximately 23 MT CO₂e per year. In addition, as with project-generated construction criteria air pollutant emissions, GHG emissions generated during proposed construction activities would be short term, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Operational Emissions

Once construction is complete, project operation is anticipated to entail routine maintenance performed at the stormwater capture facility and other park features. Reservoir maintenance would entail removal of debris and pollutant constituents from the treatment devices, pump testing and calibration, and cleaning the storage reservoir. During long-term operations, the project would generate GHG emissions from mobile sources, including two maintenance workers accessing the site, and energy sources, including one electric pump to pump stormwater and one electric pump to assist the existing irrigation system. The electric pumps would consume approximately 86,585 kWh of electricity per year. The electric pumps were modeled as off-road equipment in CalEEMod, and the GHG emissions associated with their use were accounted for as an Energy source.

Table 3.8-2 presents the GHG emissions resulting from operation of the project. For further detail on the assumptions and results of this analysis, please refer to Appendix A, Air Quality and Greenhouse Gas Modeling.

Table 3.8-2. Estimated Annual Operational Greenhouse Gas Emissions

	CO ₂	CH ₄	N ₂ O	R	CO ₂ e
Emissions Source	Metric Tons				
Mobile	7.95	<0.01	<0.01	0.01	8.05
Energy	13.60	<0.01	<0.01	N/A	13.68
	Total Operational Emissions				
Amortized Construction Emissions					22.58
Total					44.31
SCAQMD Threshold					3,000

Table 3.8-2. Estimated Annual Operational Greenhouse Gas Emissions

	CO ₂	CH ₄	N ₂ O	R	CO ₂ e	
Emissions Source	Metric Tons	Metric Tons				
			Exceeds	Threshold?	No	

Source: Appendix A, Air Quality and Greenhouse Gas Modeling.

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerants; CO_2e = carbon dioxide equivalent; 0.01 = value is less than 0.005.

Totals may not sum due to rounding.

As shown in Table 3.8-2, the project would not exceed the SCAQMD threshold of 3,000 MT CO₂e per year. Projects below this significance criterion have a minimal contribution to global GHG emissions and are considered to have less-than-significant impacts. Therefore, operational impacts associated with directly or indirectly generating a significant quantity of GHG emissions would be **less than significant**.

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

Less-than-Significant Impact. Applicable plans for the project site include SCAG's 2024–2050 RTP/SCS, CARB's 2017 and 2022 Scoping Plan Updates to address Senate Bill (SB) 32 and AB 1279, and the 2017 City of Carson Climate Action Plan (CAP). Each of these plans is described below along with an analysis of the proposed project's potential to conflict with the related GHG emission reduction goals.

Project Consistency with SCAG's 2024-2050 RTP/SCS

On April 4, 2024, SCAG adopted the 2024–2050 RTP/SCS, also referred to as Connect SoCal 2024. Connect SoCal 2024 builds on the prior RTP/SCS and identifies the following strategy areas to support its environmental goals: Sustainable Development, Air Quality, Clean Transportation, Natural and Agricultural Lands Preservation, and Climate Resilience (SCAG 2024). The primary objective of the 2024–2050 RTP/SCS is to provide guidance for future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout the region, as stipulated under SB 375. Given that the proposed project involves the renovation of an existing park and the construction of a stormwater capture and treatment facility, the goals and strategies of the 2024–2050 RTP/SCS are not directly applicable. As such, the proposed project would not conflict with the goals and policies of the 2024–2050 RTP/SCS and impacts would be less than significant.

Project Consistency with State Reduction Targets and CARB's Scoping Plans

The California State Legislature passed the Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32) to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the state's long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. For the proposed project, the relevant GHG emissions reduction targets include those established by SB 32 and AB 1279, which require GHG emissions be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 requires the state achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter.

As defined by AB 32, CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. The Scoping Plan is required to be updated every 5 years and requires CARB and other state agencies to adopt regulations and initiatives that will reduce GHG emissions statewide. The first Scoping Plan was adopted in 2008, and it was updated in 2014, 2017, and most recently in 2022. Although the Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations, ¹⁰ it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets. Therefore, a project would be found to not conflict with the statutes if it would meet the Scoping Plan policies and would not impede attainment of the goals therein.

CARB's 2017 Scoping Plan update was the first to address the state's strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017); the most recent CARB 2022 Scoping Plan update outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress toward the 2030 SB 32 target (CARB 2022). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2017 and 2022 Scoping Plan updates are the most applicable to the proposed project.

The 2017 Climate Change Scoping Plan Update included measures to promote renewable energy and energy efficiency (including the mandates of SB 350), measures to increase stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and measures to increase stringency of SB 375 targets. The 2022 Scoping Plan for Achieving Carbon Neutrality builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022).

Many of the measures and programs included in the Scoping Plan would result in the reduction of project-related GHG emissions with no action required at the project-level, including GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (Low Carbon Fuel Standard), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy). Given that the proposed project is also not anticipated to result in substantial increase in mobile trips, the project would also not conflict with the 2017 update's goal of reducing GHG emissions through reductions in VMT statewide.

The 2045 carbon neutrality goal required CARB to expand proposed actions in the 2022 update to include those that capture and store carbon in addition to those that reduce anthropogenic sources of GHG emissions. The proposed project would support the state's carbon neutrality goals, as implementation includes addition of urban trees and native plantings throughout the project site, which represent opportunities for potential carbon removal and sequestration over the project lifetime. However, the 2022 update emphasizes that reliance on carbon sequestration in the state's natural and working lands will not be sufficient to address residual GHG emissions, and achieving carbon neutrality will require research,

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

development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture). Given that the specific path to neutrality will require development of technologies and programs that are not currently known or available, the project's role in supporting the statewide goal would be speculative and cannot be wholly identified at this time.

Overall, the proposed project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent applicable and required by law. As mentioned above, several Scoping Plan measures would result in reductions of project-related GHG emissions with no action required at the project-level, including those related to energy efficiency, reduced fossil fuel use, and renewable energy production. As demonstrated above, the proposed project would not conflict with CARB's 2017 or 2022 Scoping Plan updates or with the state's ability to achieve the 2030 and 2045 GHG reduction and carbon neutrality goals.

Project Consistency with City of Carson Climate Action Plan

The South Bay Cities Council of Governments developed the City of Carson CAP in December 2017, which outlines a comprehensive strategy to address climate change and promote sustainability within the community. The CAP identifies key areas to support its goals, Land Use and Transportation, Energy Efficiency, Solid Waste, Urban Greening, and Energy Generation and Storage. The primary objectives of the CAP are to reduce GHG emissions, enhance community and neighborhood sustainability, promote zero-emission vehicles, advance energy and water efficiency, reduce waste, transform built environments into green spaces, and support renewable energy and storage. Given that the proposed project involves the construction of a stormwater capture and treatment facility and improvements to an existing park, many of the goals and strategies of the CAP are not directly applicable. However, the project would support the goals related to community and neighborhood sustainability and water efficiency through the stormwater capture and treatment facility and park improvements. As such, the proposed project would not conflict with the goals and policies of the CAP, and impacts would be less than significant.

Based on the preceding considerations, the proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions, and impacts would be **less than significant**.

3.9 Hazards and Hazardous Materials

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX.	IX. 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?				

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d)	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				

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

Less-than-Significant Impact. Relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, adhesive materials, grease, solvents, and architectural coatings would be used during construction. Operation and maintenance of the project would also require routine use of common hazardous substances. These materials are used routinely throughout urban environments for construction projects and operation of utility infrastructure. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment. With adherence to state and local regulations, impacts associated with routine transport, use, and disposal of hazardous materials would be **less than significant**.

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

Less-than-Significant Impact. As discussed under Section 3.9(a), Hazards and Hazardous Materials, construction and operation would involve relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, and solvents. These materials are not considered acutely hazardous and are used routinely throughout urban environments for both construction and operation of projects. Further, these materials would be transported, handled, and disposed of in accordance with all federal, state, and local laws regulating the management of, spill prevention, and spill response, related to, hazardous materials. Impacts would be **less than significant**.

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

Less-than-Significant Impact. Two schools are located within 0.25 miles of the project site. This includes Carnegie Middle School, located at 21820 Bonita Street, adjacent to the project site's northern boundary along East 220th Street and Bonita Elementary School, located at 21929 Bonita Street, adjacent to the project site's western boundary along Bonita Street. Construction and operation of the project would involve relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, and solvents. These materials are used routinely throughout urban environments for construction projects and would not pose a significant risk to the public or environment. Additionally, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Additionally, a construction HRA was performed for the project, which demonstrates that the TAC exposure from construction diesel exhaust emissions would not result in cancer risk above the 10 in 1 million threshold or a Chronic Hazard Index more than 1 for school children at Bonita Street Elementary School and Carnegie Middle School (see Table 3.3-7). As such, impacts would be less than significant.

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

No Impact. According to the California Department of Toxic Substances Control EnviroStor database, no sites or facilities are located within or adjacent to the project site. The nearest identified active site is Gardena Valley Landfill No. 6, a Voluntary Cleanup Site, located approximately 0.75 miles north of the project site (DTSC 2025). Other state and local government agencies are required to provide additional hazardous materials release information for the Cortese List. The State Water Resources Control Board GeoTracker database identifies leaking underground storage tanks, waste discharge sites, oil and gas sites, and other waste or cleanup sites. A review of GeoTracker did not identify any sites or facilities within or adjacent to the project site. The nearest identified site with open-site assessment status is the Dominguez Channel at Carson Street (ID No. T10000003058) a Cleanup Program Site, located approximately 0.22 miles northeast of the project site (SWRCB 2025). These hazardous materials sites are located at adequate distances from the project site such that they would be of no concern to present a worker hazard for construction crews. Therefore, **no impact** would occur.

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

No Impact. The project site is approximately 4.2 miles south of the Compton/Woodley Airport, 5 miles northeast of the Torrance Municipal Airport, 5.4 miles west of the Long Beach Airport, 7.6 miles south of the Hawthorne Municipal Airport, and 10.5 miles southeast of the Los Angeles International Airport. The project site does not fall within the airport land use plan for these airports. The project is not located within 2 miles of a public use airport. Therefore, **no impact** would occur.

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

Less-than-Significant Impact. The City has prepared a Draft Hazard Mitigation Plan. The hazard mitigation plan is a document that contains information to assist communities in reducing risk from hazards by identifying resources, information, and strategies for risk reduction (City of Carson 2024). A stormwater diversion structure would be constructed to connect the proposed system to existing storm drains under East 220th Street and Bonita Street. Additionally, an underground storage reservoir installed beneath the baseball/softball and soccer outfields at Calas Park would be connected directly to the diversion pipeline and an outflow pipeline for sending water back into an existing catch basin beneath East 220th Street. As such, project construction would require the temporary partial closures of East 220th Street and small portion of Bonita Street. The temporary partial closures of East 220th Street and Bonita Street would be performed pursuant to a traffic control plan prepared by the contractor and subject to City approval, which would demonstrate that emergency access or evacuation would not be impeded. Traffic on East 220th Street and Bonita Street would resume to existing conditions upon completion of the project. Impacts would be less than significant.

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

No Impact. According to the California Department of Forestry and Fire Protection (CAL FIRE), The project site is located within a Local Responsibility Area and is not located within a Very High Fire Hazard Severity Zone (CAL FIRE 2024). The nearest Very High Fire Hazard Severity Zone is located approximately 4.7 miles southwest of the project site. In the event of an emergency, fire response services for the project are provided by the Los Angeles Couty Fire Department. Construction and operation of the project would comply with Article III, Chapter 1 of the City's Municipal Code, which adopts the Los Angeles County Fire Code by reference. The project would not include structures intended for long-term occupancy or include development that could exacerbate fire risk. Furthermore, the project site is relatively flat and the proposed project would not alter land on the project site; therefore it would not influence prevailing winds or other factors that could exacerbate wildfire risk. As such, people and structures would not be exposed to a significant risk of loss, injury, or death involving wildfires. **No impact** would occur.

3.10 Hydrology and Water Quality

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Χ.	HYDROLOGY AND WATER QUALITY - Would the	ne project:			
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	 result in substantial erosion or siltation on- or off-site; 			\boxtimes	
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site;				
	iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
	iv) impede or redirect flood flows?			\boxtimes	
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				

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

Less-than-Significant Impact. The project site is located within the boundaries of the DC WMG. The DC WMG EWMP outlines the water quality objectives, and includes measures to reduce discharge pollutants, and protect and improve the Dominguez Channel water bodies (DC WMG 2016).

Construction of the project would involve ground-disturbing activities for grading that could result in sediment discharge in stormwater runoff. Additionally, construction would involve the use of oil, lubricants, and other chemicals that could be discharged from leaks or accidental spills. These potential sediment and chemical discharges during construction would have the potential to impact water quality in receiving water bodies. However, because the project would disturb over 1 acre of land, the project would be required to prepare and implement a SWPPP, which would include water quality BMPs to ensure that water quality standards are met and that runoff from the construction work areas does not cause degradation of water quality in receiving water bodies. Through the incorporation of BMPs through implementation of SWPPP requirements, impacts associated with water quality standards during construction would be less than significant.

The project is a result of the Stipulated Order, which is in response to violations occurring from the discharge of untreated wastewater into the Dominguez Channel. The project would decrease the amount of pollutants in stormwater and dry-weather runoff entering the Dominguez Channel, helping to achieve EWMP goals and MS4 permit compliance. Upon operation, existing stormwater flows would be diverted and treated prior to infiltration and/or discharge, resulting in water quality benefits compared to existing conditions. Ongoing maintenance and sampling would ensure that the project is performing as expected in terms of treatment of stormwater. Therefore, impacts during operation would be **less than significant**.

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

Less-than-Significant Impact. Groundwater was measured at a depth of approximately 28 feet for borings taken as part of the project's geotechnical investigation (Ninyo & Moore 2025). The project would include the installation of an underground storage reservoir that would connect to existing storm drains to collect stormwater. would facilitate infiltration of captured stormwater, allowing water to seep into the underlying aquifer and providing natural filtration through the soil. In this way, the project would increase groundwater recharge in areas under the park. The project would not otherwise result in a substantial change in impervious surfaces that would affect groundwater infiltration because the proposed park rehabilitation would replace all existing amenities with improved features that would not substantially alter the amount of impervious surface and would be consistent with the existing uses and conditions at the park. Additionally, the project would not entail temporary or permanent use of groundwater and, thus, would not deplete groundwater within the project vicinity. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge; impacts would be less than significant.

- c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i) Result in substantial erosion or siltation on- or off-site?

and

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

and

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

and

iv) Impede or redirect flood flows?

Less-than-Significant Impact. The project would not substantially alter existing drainage patterns, including streams or river courses. Construction of the project would entail temporary earthwork to excavate and install the storage reservoir and associated infrastructure. Implementation of the project-specific SWPPP, including BMPs, would prevent substantial erosion and siltation of exposed soils during construction activities. Once construction of the stormwater infrastructure is complete, the park facilities would be replaced with enhanced facilities to serve the needs of park visitors.

In operation, the intent of the project is to capture and divert stormwater flows, which would be directed to the underground system and therefore would not result in substantial erosion, siltation, or runoff. Operation of the stormwater infrastructure would improve the stormwater system because it would improve storage and filtration capabilities, which would reduce pollution of stormwater runoff. The project would not result in a substantial change in impervious surfaces within the project site because the proposed park rehabilitation would include the replacement of existing features with similar, enhanced park features. Therefore, implementation of the project would not substantially alter the existing drainage pattern of the site or area in a way that would cause substantial erosions, flooding, polluted runoff, or changes to flood flows. Impacts would be **less than significant**.

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

No Impact. According to Federal Emergency Management Agency flood maps, the project site is located in a Flood Zone X. The western portion of the project site is mapped as an "area of minimal flood hazard" and the eastern portion of the site is mapped as an "Area with reduced flood risk due to levee (FEMA 2008). Additionally, the project site is not located within a tsunami inundation zone and seiches do not pose a hazard to the project site (DOC 2025c). The project would include the construction of a stormwater capture and treatment facility, which would improve the water quality of the Dominguez Channel Estuary. As discussed in Section 3.10(a), Hydrology and Water Resources, the project would prepare a SWPPP, which would include water quality BMPs to ensure that water quality standards are met and that runoff from the construction work areas would not cause degradation of water quality in receiving water bodies. Upon completion of construction, the project would not require the storage of pollutants that, in the event of inundation, could be released. A pump would be installed to pump stormwater back to the storm drain system during low flow conditions and discharging into the Dominguez Channel, similar to existing flow

conditions except the stormwater flow would be pre-treated. Therefore, **no impact** associated with the risk of release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone would occur.

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

Less-than-Significant Impact. As discussed in greater detail in Chapter 1, Introduction, the proposed project is a result of the Stipulated Order, which is in response to violations occurring from the discharge of untreated wastewater into the Dominguez Channel. The project would include runoff storage and water quality benefits for the City and other DC WMG members, helping to achieve EWMP goals and MS4 permit compliance. As such, the project would implement the applicable water quality control plan for the region. As discussed previously, the project would allow for infiltration into the underlying soils and would not interfere with groundwater supplies. Therefore, the project would not conflict with a water quality control plan or sustainable groundwater management plan and impacts would be **less than significant**.

3.11 Land Use and Planning

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	LAND USE AND PLANNING - Would the project	ct:			
a)	Physically divide an established community?				
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				

a) Would the project physically divide an established community?

No Impact. The project site would be located on approximately 4.6 acres of Calas Park. The project would not create a physical division of an existing community, like what could occur with the development of a freeway or large linear infrastructure. The project would not result in a removal of an existing means of access, such as a road or bridge, that would impede mobility with an existing community and other areas. Upon completion, recreational use of the affected portion of the park would resume consistent with existing conditions. Therefore, the project would not physically divide an established community, and **no impact** would occur.

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

No Impact. The project site is zoned as Open Space and has a General Plan land use designation of Park/Open Space. The project would include the construction of a stormwater capture and treatment

facility, primarily located underground, and park improvements to the existing Calas Park. Upon completion, recreational use of the affected portion of the park would resume under similar conditions. Implementation of the project would not result in a change to land uses. Potential environmental impacts associated with the implementation of the project are analyzed throughout this MND. The project will incorporate applicable mitigation measures to reduce environmental impacts. Therefore, the project would not be in conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, **no impacts** would occur.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES - Would the project	t:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specifi plan or other land use plan?				

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

and

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. The project site is entirely developed and within an urban area. No mineral resources are known to occur on or near the project site (USGS 2025). Therefore, the project would not result in any loss of availability of a known mineral resource or locally important mineral resource recovery site, and **no impact** would occur.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE - Would the project result in:				
a) Generation of a substantial temporary of permanent increase in ambient noise les in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	vels			
b) Generation of excessive groundborne vibration or groundborne noise levels?			\boxtimes	
c) For a project located within the vicinity of private airstrip or an airport land use plat or, where such a plan has not been adopted, within two miles of a public air or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	port 🗆			

This section is based on technical analysis conducted by Dudek, including quantitative estimates of noise emissions based on assumptions developed in consultation with the project design engineers. The results of the noise estimates are provided as Appendix G, Noise Assessment Data, to this MND.

Existing Setting

The Project is located in the southern portion of the City of Carson, which is in southwestern Los Angeles County, California. To the north, the park is bounded by East 220th Street, followed by Carnegie Middle School, a grassy area containing the transmission line corridor, and residential uses. To the south, the park is bounded by East Jay Street, followed by residential uses, and East 223rd Street, followed by light industrial/warehousing, office, and commercial uses. To the east, the park is bounded by South Edgar Street, followed by residential uses. To the west, the park is bounded by residential uses.

Represented by locations ST1, ST2, and ST3 in Table 3.13-1, the existing outdoor ambient sound environment of the project location was sampled during a field survey conducted on February 20, 2025 (see Figure 5). Collected sample sound pressure level measurements at these locations, along with documented investigator observations regarding perceived or witnessed acoustical contributors to this baseline or pre-project noise environment, also appear in Table 3.13-1. These locations are intended to be representative of the existing single-family homes adjoining the project area. Photographs, tagged survey positions, and instrument details can be found in Appendix G, Noise Assessment Data.

Table 3.13-1. Measured Samples of Existing Outdoor Ambient Sound Level

Survey Position	Description/Address	Time	L _{eq} (dBA)	L _{max} (dBA)	L _{min} (dBA)	Notes (Perceived Sound Sources)
ST1	1037 E 220th St, Carson, California 90745	1:12 p.m 1:27 p.m.	59.6	74.7	47.4	Traffic, Birds, Distant Landscape Noise, Aircraft Noise
ST2	Western Calas Park boundary	12:37 p.m 12:52 p.m.	54.7	75.9	47.7	Traffic, Birds, Distant Dog Barking, Rustling Leaves, Distant Aircraft
ST3	1002 E Jay St, Carson, California 90745	12:54 p.m 1:09 p.m.	52.1	65.7	46.8	Traffic, Birds, Distant Landscape Noise, Rustling Leaves

Source: Appendix G, Noise Assessment Data.

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

The measured outdoor energy-equivalent sound level (Leq) values appearing in Table 3.13-1 range from 52.1 to 59.6 A-weighted decibels (dBA) and are consistent with expectations for the environment based on the distance to roadways, such as East 220th Street.

Regulatory Setting and Thresholds of Significance

In the City of Carson, construction activities near single-family residential areas are regulated under the Carson Municipal Code, specifically Section 5502(c), which amends the Los Angeles County Noise Control Ordinance to establish local standards. Construction is permitted Monday through Saturday from 7:00 a.m. to 8:00 p.m., and is prohibited on Sundays and legal holidays. For construction activities lasting 20 days or less, the maximum allowable exterior noise level is 75 dBA during permitted hours and 60 dBA during prohibited hours. For activities extending beyond 20 days, the limits are reduced to 65 dBA during permitted hours and 55 dBA during prohibited hours. These noise levels are measured at the property line of the affected single-family residence. Compliance with these standards is mandatory for all construction projects and is enforced by the City of Carson to minimize noise impacts on residential neighborhoods.

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

Construction

Less-than-Significant Impact with Mitigation. Construction of the project would result in the temporary generation of noise at the project site. Construction would involve the use of heavy equipment and machinery, such as excavators, loaders, cranes, temporary generators, scrapers, and other equipment. Construction would generate levels of noise that can vary from hour to hour and day to day depending on the equipment in use, the operations being performed, and the distance between the source and receptor. Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time. Aggregate noise emission from construction activities, broken down by phase, was

predicted at two evaluation distances to the nearest existing noise-sensitive receptor: (1) from the nearest position of the construction site boundary, and (2) from the center of the construction site. The closest existing noise-sensitive residential receptor is approximately 50 feet to the west of the proposed project's western boundary. At the site boundary, this analysis assumes that only the two loudest pieces of equipment, comparable to Federal Transit Administration general assessment guidance, for the listed phase will be involved in construction activity for a limited portion of the 8-hour workday. In other words, at such proximity, the operating equipment cannot "stack" or crowd the vicinity and still operate.

Table 3.13-2 presents the estimated construction noise level (8-hour L_{eq}) for each anticipated phase of project construction activity. Details of these predictions in Appendix G, Noise Assessment Data, show the expected acoustical contribution from each type of operating construction equipment for each phase.

Table 3.13-2. Estimated Per-Phase Construction Noise Levels

Project Construction Activity Phase	Nearest Horizontal Distance to Nearest Noise-sensitive Receptor (Feet)	Predicted 8-hour L _{eq} (dBA) for Nearest Distance	Centroid Horizontal Distance to Nearest Noise-sensitive Receptor (Feet)	Predicted 8-hour L _{eq} (dBA) for Centroid Distance
Demolition	50	72.9	200	68.5
Site Preparation	50	74.2	200	69.2
Underground Stromwater Storage system excavation	150	67.5	200	68
Underground stormwater storage system construction	150	67.6	200	64.6
Storm drain diversion and pretreatment	50	74	200	64.4
Outlet Line	50	74.7	200	67.4
Landscape and Site improvements	50	73.9	200	63.8

Source: Appendix G, Noise Assessment Data.

Note: Lea = energy-equivalent sound level; dBA = A-weighted decibel

As presented in Table 3.13-2, the estimated construction noise levels are predicted to reach up to 74.7 dBA L_{eq} over an 8-hour period at the nearest existing residences, located approximately 50 feet from the project's western boundary during outlet line activities. These estimates are based on modeling assumptions that limit the operation of heavy equipment to a cumulative period of up to 1 hour per day during the demolition, site preparation, and landscape and site improvement phases. However, if construction equipment were to operate for longer durations or concurrently during the same workday, the noise levels could potentially exceed the 65 dBA 8-hour L_{eq} threshold established by the City for single-family residential areas, as specified in Carson Municipal Code Section 5502(c) for long-term construction activities (lasting more than 20 days).

At more typical distances, closer to the center of the project site (approximately 200 feet from the nearest residence), construction noise levels are estimated to range from approximately 64 dBA L_{eq} to 69 dBA L_{eq}. To ensure compliance with the 65 dBA 8-hour L_{eq} threshold and to mitigate potential exceedances, **MM-NOI-1** shall be implemented. Proper implementation of **MM-NOI-1**, including the installation of 8-foot-tall temporary noise barriers along the project boundaries, can reduce noise levels by up to 12 decibels, thereby

reducing the estimated unmitigated construction noise levels to approximately 64.7 dBA Leq, which is within the acceptable limit.

In summary, while construction noise during allowable daytime hours (between 7:00 a.m. and 8:00 p.m.) has the potential to exceed the 65 dBA 8-hour Lea threshold at the nearest residential receptors, the incorporation of MM-NOI-1 is recommended to reduce construction noise exposure levels. With the implementation of this mitigation measure, temporary construction-related noise would be less than significant.

The outcome of the King & Gardiner Farms versus Kern County judge's decision established a requirement for construction noise analyses to disclose the relative increase of construction noise over ambient noise levels. Construction noise levels would cause a temporary increase of up to 15 dB to 23 dB Leq over existing ambient noise levels, which would be perceived as being up to four times as loud to average healthy hearing.

Operation

Less-than-Significant Impact. Upon completion of construction, the project would feature underground infrastructure to convey stormwater. Operation of powered mechanical systems would be enclosed in a concrete "wet well" below grade with only a double-door hatch to the above-surface environment. Hence, noise from operation of pump would be isolated by the closed access hatch and would result in predicted noise levels that are less than 30 dBA at a radius of over 50 feet from the hatch, well below the existing noise environment (Table 3.13-1). On this basis and compared to the measurement samples of Leg presented in Table 3.13-1, project operation noise is anticipated to be less than the existing outdoor ambient level at the noise-sensitive residential receptor.

Replacement of the athletic fields after construction of the subsurface stormwater capture system would restore Calas Park conditions prior to the proposed project, which includes visitors enjoying sports or spectating from bleachers at locations on the field perimeters. Therefore, noise from these on-site field activities that involve participant and spectator speech and related sound emission would be relatively unchanged. Project operation noise would be considered less than significant.

The following mitigation measure would apply during project construction activities:

MM-NOI-1

Temporary Construction Noise Reduction. The City or its contractor shall implement one or more of the following options for on-site noise control and sound abatement means that, in aggregate, would yield a minimum of 10 dB of construction noise reduction during construction of the project:

- Administrative controls (e.g., further reduce operating time of equipment and/or prohibit usage of equipment type[s] within certain distances to a nearest receiving occupied off-site property).
- Engineering controls (change equipment operating parameters [e.g., speed, capacity], or install features or elements that otherwise reduce equipment noise emission [e.g., upgrade engine exhaust mufflers]).
- Install noise abatement on the site boundary fencing (or within, as practical and appropriate) in the form of sound blankets or comparable temporary solid barriers to

occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive receptor(s) of concern.

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

Less-than-Significant Impact. Vibration is oscillatory movement of mass (typically a solid) over time. Depending on their distances to a sensitive receptor, operation of large bulldozers, graders, loaded dump trucks, or other heavy construction equipment and vehicles on a construction site have the potential to cause high vibration amplitudes.

The Carson Municipal Code does not have a vibration threshold against which project construction-related ground-borne vibration impacts to the community can be assessed. For purposes of this impact assessment, a vibration velocity level of 0.2 inches per second (ips) peak particle velocity (PPV) is used as the standard for evaluating human annoyance (to perceived ground-borne vibration within an occupied structure) and the potential risk for residential building damage due to "continuous" or frequently occurring ground-borne vibration events (Caltrans 2020).

Ground-borne vibration attenuates rapidly, even over short distances. The attenuation of ground-borne vibration as it propagates from source to receptor through intervening soils and rock can be estimated with expressions found in Federal Transit Administration and Caltrans guidance. By way of example, for a bulldozer or grader operating as close as 50 feet to the nearest receiving residential land use during the site preparation construction phase as shown in Table 3.13-2, the estimated vibration velocity level would be 0.031 ips per the equation as follows (FTA 2018):

$$PPV_{rcvr} = PPV_{ref} \times (25/D)^{1.5} = 0.031 \text{ ips } PPV = 0.089 \times (25/50)^{1.5}$$

In the above equation, PPV_{rcvr} is the predicted vibration velocity at the receiver position (i.e., residence), PPV_{ref} is the reference value at 25 feet from the vibration source (the bulldozer), and D is the actual horizontal distance to the receiver from the source.

Predicted ground-borne vibration velocity PPV values associated with project construction are below the 0.2 ips PPV threshold for building occupant annoyance and building damage risk. Impacts during construction would be less than significant.

Once operational, the proposed project would not be expected to feature major producers of ground-borne vibration. For this reason, project operation ground-borne vibration at off-site receptors would be considered **less than significant**.

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

No Impact. There are no public airports or private airfields within 2 miles of the project and the project area is far from any aviation traffic noise contour greater than 65 dBA community noise equivalent level. Construction workers and park users would not be exposed to significant aviation noise levels. **No impact** would occur.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING - Would the pro-	oject:			
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				

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

No Impact. Construction of the project would result in a temporary direct increase in construction jobs in the area. However, given the relatively small nature of the project construction and anticipated schedule, the demand for construction employment would likely be met within the existing and future labor market in the City and in the greater Los Angeles County area. If construction workers live outside of the City, these workers would likely commute during the temporary construction period. Operationally, the project does not contain land uses that typically result in direct population growth, such as new homes or large commercial/business centers. The project would not change the use of the existing Calas Park. Upon completion, the project would improve Calas Park to further serve the existing and anticipated future demand for recreational uses within the City. Additionally, the project is consistent with underlying land use and zoning designations. Therefore, the project would not directly result in substantial unplanned population growth in the area.

The project is located in an area served by existing roads and infrastructure. The project does not include the extension of utility infrastructure, such as sewer lines or roads, into previously undeveloped areas that may indirectly induce growth. Therefore, the project would not indirectly result in substantial unplanned population growth in the area. **No impact** would occur.

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

No Impact. The project site does not contain any existing housing or provide other means of housing people. The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. **No impact** would occur.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact		
XV. PUBLIC SERVICES – Would the project:						
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:						
Fire protection?				\boxtimes		
Police protection?						
Schools?						
Parks?			\boxtimes			
Other public facilities?						

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

Fire protection? Police protection? Schools? Other public facilities?

No Impact. As discussed in Section 3.14, Population and Housing, the project would not induce substantial unplanned population growth in the area. As such, construction, operation, and maintenance of the project would not require new or physically altered facilities associated with fire protection, police protection, schools, or other public facilities. Therefore, **no impacts** would occur.

Parks?

Less-than-Significant Impact. The project is located within Calas Park and would result in physical alteration to an existing park. The total duration of project construction is anticipated to last 14 months and would require temporary closure of the park. Depending on the construction phase, affected portions of Calas Park would be temporarily closed to the public for the duration of the construction phase. The construction area would be fenced off for safety and security purposes and made unavailable for public use during project construction. The proposed stormwater capture and treatment facility would be located primarily underground and would not affect park use. The project would also include replacing the existing baseball/softball and soccer fields, replacing the outfield fence along East 220th Street, and planting new trees as described in Section 2.2.2, Park Improvements. Upon completion of construction, recreational use of the park would resume similar to existing conditions. As such, implementation of the project would not require the provision of new parks. Therefore, impacts to parks as a result of the project would be less then significant.

3.16 Recreation

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
ΧV	I. RECREATION				
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				

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

Less-than-Significant Impact. The total duration of project construction is anticipated to last 14 months and would require the temporary closure of portions of Calas Park. As such, project construction may result in the temporary increase in use of other parks in the City. However, upon completion of construction, recreational use of the affected portion of the park would resume under existing conditions. As such, impacts to recreational facilities would be **less than significant**.

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

Less-than-Significant Impact. The project would include improvements to the existing Calas Park. As discussed in Section 3.16(a), Recreation, the temporary closure of the park may result in an increase in use of other parks in the City. However, upon completion of construction, recreational use of the affected portion of the park would resume under existing conditions. Furthermore, as discussed in Section 3.14, Population and Housing, implementation of the project would not induce population growth. As such, the project would not require the construction or expansion of recreational facilities. Potential environmental impacts associated with the implementation of the project are analyzed throughout this MND. Impacts would be **less than significant**.

3.17 Transportation

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

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

Less-than-Significant Impact. The project would not conflict with applicable programs, plans, ordinances, or policies addressing the circulation system, as further discussed below. This includes the City's General Plan Circulation Element (City of Carson 2023); the Carson Master Plan of Bikeways (City of Carson 2013); and the existing and proposed roadway, pedestrian, bicycle and transit facilities and services in the project area.

General Plan Circulation Element

The Circulation Element furthers the General Plan's vision and objectives of promoting multi-modal mobility, enhancing connection and access across the community, and supporting development of "Complete Streets," while minimizing adverse impacts of truck traffic. The Circulation Element seeks to improve access and safety for all roadway users, and encourage walking, biking, and the use of public transit to meet local and regional goals. (City of Carson 2023). The following guiding policies are relevant to the project:

- CIR-G-1: Provide a balanced transportation system of multimodal networks providing a broad range of travel options to make transportation convenient, comfortable, and safe for people of all abilities.
- CIR-G-2: Promote bicycling and walking, and support and improve connections to local and regional transit service.
- CIR-G-3: Manage the transportation network to minimize roadway congestion, while balancing traffic Level of Service (LOS) objectives with promoting reduction in vehicle miles traveled and considerations of community character and design.

Carson Master Plan of Bikeways

The Carson Master Plan of Bikeways lays out a strategic vision for enhancing bicycle transportation in the city. This plan is the guiding document for all bicycle infrastructure, policies, and programs in Carson. The plan is a blueprint to enable citizens to feel safe and comfortable when bicycling throughout the City, and it aims to encourage more citizens to partake in this healthy, environmentally conscious transportation choice. The plan proposes an extensive network of streets designed to be safe and comfortable for bicyclists, with the goal of enhancing the practical use of bicycles as a transportation choice. Using the planned network, people in Carson can reach schools, shopping, jobs, recreational activities, and other important destinations—all without the need to drive. In addition to the proposed bikeway network, the Master Plan of Bikeways also contains bikeway design guidelines, recommended programs and policies to encourage bicycle travel and increase cyclist safety, potential funding sources for implementing the plan, and an implementation framework that prioritizes the most important bikeway projects.

Transit, Bicycle, and Pedestrian Facilities

Public transportation in the City is provided by the Los Angeles County Metropolitan Transportation Authority, Torrance Transit, Long Beach Transit, Compton Renaissance Transit, and Gardena Transit. The City of Carson provided a service called the Carson Circuit; however, it was discontinued during the COVID-19 pandemic and the City has instead offered Dial-A-Ride services for all adult Carson residents (City of Carson 2022). The nearest transit route to the site is Long Beach Transit Route 8, with service on East 223rd Street. Long Beach Transit Route 8 is an east-west route that connects Long Beach and Carson. The nearest bus stop to the project site is located at the intersection of East 223rd Street and South Edgar Street, approximately 0.18 miles south of the project site, servicing Long Beach Transit Route 8. The route operates from approximately 5:05 a.m. to 8:10 p.m. on weekdays, and from 10:45 a.m. to 5:55 p.m. on Saturday. The bus stop at the intersection of Bonita Street and Carson Street is located approximately 0.27 miles northwest of the projects, servicing Long Beach Transit Route 4. Long Beach Transit Route 4 operates from approximately 5:11 a.m. to 8:49 p.m. on weekdays, and from 10:10 a.m. to 5:49 p.m. on Saturdays.

There are numerous existing and proposed bike facilities within the vicinity of the project site, including a Class III bike route on Carson Street, between Figueroa Street and the Dominguez Channel, and a Class II bike lane on Avalon Boulevard, between East 223rd Street and Deloras Drive. Proposed bike facilities in the vicinity of the project site include Class III bike routes on East 220th Street, between Figueora Street and East 223rd Street, and on Bonita Street, between East 223rd Street and East 213th Street (City of Carson 2023).

The City of Carson is well served by sidewalks, with relatively few gaps in the sidewalk network. Sidewalks are present along most streets throughout the City except for some neighborhoods and industrial areas. Pedestrian crosswalks are provided at signalized and, occasionally, unsignalized intersections (City of Carson 2023).

Impact Analysis

The project entails constructing and operating a stormwater capture and treatment facility within the northern portion of Calas Park, replacing the existing baseball/softball and soccer fields once construction is complete, and improving amenities that will be similar in nature to the existing features.

Construction

The project would result in a temporary, short-term increase in traffic during construction. This includes construction workers arriving to and from the project site and the delivery of large construction equipment and hauling trips to the site as needed. The total duration of project construction is anticipated to be 14 months, with some phases overlapping. Typical construction work hours would be Monday through Friday, 7:00 a.m. to 8:00 p.m., pursuant to the City of Carson Noise Control Ordinance. Night work is not anticipated.

Regional access to the park is from I-405, which is approximately 0.2 miles to the northeast; State Route 47, which is approximately 1.6 miles to the east; and I-110, which is approximately 1.7 miles to the west. Local construction access would be provided from East 220th Street. Temporary equipment staging and construction trailers would be established within the existing park boundary, with no additional off-site staging anticipated to be needed. Project construction would require the temporary partial closures of East 220th Street and Bonita Street. No full road closures are anticipated, and access to surrounding driveways would be maintained at all times. The temporary partial closures of East 220th Street and Bonita Street would be performed pursuant to a traffic control plan prepared by the contractor and subject to City approval. The traffic control plan would include measures such as identifying the proposed truck routes, minimizing and/or avoiding truck travel during peak hours, using flaggers for local site access, and other measures. All lane closures would be performed pursuant to the traffic control plan. With implementation of the traffic control plan, the potential impact to the local circulation would be minimized and there would be no changes that would affect the safety and accessibility of the transportation system.

Construction of the reservoir would entail removing the field surface and excavating earth material up to approximately 20 feet below ground surface. Material would be placed into dump trucks and hauled off site to a licensed landfill or quarry for reuse or disposal. The full extent of the material haul route or routes would be determined by the contractor and City of Carson Public Works Department once a disposal site has been identified. It is anticipated that the local route would follow South Edgar Street to East 223rd Street, which is a designated truck route in the City of Carson (City of Carson 2023), to Figueroa Street to access I-405 or I-110. Due to the nominal and temporary increase in construction traffic, any effect on the operations of roadways or the overall circulation system along these roads would be minimal.

The baseball/softball and soccer fields are expected to be closed to the public for the duration of project construction, which is anticipated to be approximately 14 months. The remaining portions of the park (the basketball courts, the parking lot, and the playground) would be open to the public during construction.

The nearest bicycle facility to the project site is a Class III bike route on Carson Street between Figueroa Street and the Dominguez Channel. Long Beach Transit Route 8 is the nearest transit route to the site, with service on East 223rd Street, and a bus stop located on East 223rd Street, near South Edgar Street. The transit, bicycle, and pedestrian facilities would remain open during construction, and the temporary and minimal increase in construction-related traffic would not interfere with existing public transit, bicycle, or pedestrian facilities. Impacts would be **less than significant**.

Operations

The proposed park improvements would replace existing amenities with improved features that would allow for similar active and passive recreation uses as under existing conditions, but with an enhanced experience for park users. Once the stormwater capture system is installed, Field 2 would be replaced with an updated multipurpose field to be used for both softball and soccer. Other improvements include replacing the existing outfield fence along East 220th Street with a 12-foot fence and planting three new sycamore trees with root barriers.

Calas Park is served by multiple existing roads, including East 220th Street, South Edgar Street, and numerous local streets surrounding the site. Park users would also continue to be served by the existing transit, bicycle, and pedestrian facilities near the site. The project would reconstruct the sidewalk and drain immediately west of the tennis courts to repair surface lifting and damage. A decomposed granite path would be installed on the east side of the tennis courts to provide a connection from the sidewalk into the park.

The project would not include site improvements that would extend into the public right-of-way or interfere with the existing roadway network, public transit, bicycle, or pedestrian facilities, or impede the construction of new or the expansion of existing facilities in the future. Bicyclist and pedestrian safety would be maintained at existing levels in the area. The project would also not severely delay, impact, or reduce the service level of transit in the area.

Therefore, the proposed project would not conflict with the circulation policies within the City's General Plan or the Carson Master Plan of Bikeways. Impacts would be **less than significant**.

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

Less-than-Significant Impact. CEQA Guidelines Section 15064.3(b) focuses on VMT for determining the significance of transportation impacts. The Updated CEQA Guidelines state that "generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts," and define VMT as "the amount and distance of automobile travel attributable to a project." "Automobile" refers to on-road passenger vehicles, specifically cars and light trucks. The Governor's Office of Land Use and Climate Innovation (LCI), formerly known as the Governor's Office of Planning and Research, has clarified in its *Technical Advisory on Evaluating Transportation Impacts in CEQA* (LCI Technical Advisory) that heavy-duty truck VMT is not required to be included in the estimation of a project's VMT (LCI 2018).

The City has not yet established VMT guidelines or thresholds for evaluating transportation impacts under CEQA; therefore, the VMT Analysis was based on the LCI Technical Advisory and the Los Angeles County Public Works *Transportation Impact Analysis Guidelines* (Los Angeles County Public Works 2020). Based on guidance provided from LCI, and per the County's guidelines, land use projects can be screened from a VMT analysis if it generates 110 or fewer daily (permanent) trips, is a local serving retail use (50,000 square feet or less), is and office or residential use located in a low VMT area, is within a transit priority area, or is an affordable housing project. A project only needs to satisfy one of the screening criteria to be exempt from further VMT.

Construction

CEQA Guidelines Section 15064.3(b) is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The project is not a land use or transportation project; and the project would not result in a major expansion of Calas Park. Therefore, neither Section 15064.3(b)(1) nor Section 15064.3(b)(2) of the CEQA Guidelines apply. Instead, the project would be categorized under Section 15064.3(b)(3), suitable for qualitative analysis and not subject to a quantitative threshold. Furthermore, the County's project size screening criterium (projects generating 110 daily trips or less) are intended to address permanent vehicle trips. Therefore, a qualitative analysis of the project construction is provided.

The project would involve construction that would generate temporary construction-related traffic for approximately 14 months. Even though worker and vendor trips would generate VMT, once construction is completed, the construction-related traffic would cease, and traffic would return to pre-construction conditions. Measures to reduce the VMT generated by workers and trucks are limited, and there are no thresholds or significance criteria for temporary, construction-related VMT. The project construction would be generally consistent with construction activities in terms of the temporary nature of activities, trip generation characteristics, and the types of vehicles and equipment required. The increase in VMT associated with the projects' construction is expected to be temporary; therefore, VMT impact would be less than significant.

Operations

Once construction is complete, project operation is anticipated to entail routine maintenance activities at the stormwater capture facility performed by City staff. Activities would include removal of debris and pollutant constituents from the treatment devices, pump testing and calibration, monitoring/sampling of treatment, and cleaning the storage reservoir. Proposed park improvements would not expand the footprint of Calas Park or result in a major expansion of facilities that would induce substantial demand or park users. The operation of the project can be considered a "small project" per the County's Transportation Impact Analysis Guidelines and OPR's Technical Advisory, given that it would not generate greater than 110 daily trips¹¹ and would therefore be presumed to have a **less-than-significant** VMT impact.

Therefore, the project would not conflict or be inconsistent with CEQA Guidelines Sections 15064.3(b)(1) and 15064.3(b)(3) and impacts would be less than significant.

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This threshold ties directly to the OPR technical advisory and notes that CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area (14 CCR 15301[e][2]). Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

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

Construction

Less-than-Significant Impact. The project site is located in an established, developed area with direct access to designated local and regional truck routes. Transportation and haul permits would be required from Caltrans and the City of Carson for construction truck traffic. The project would not introduce uses (types of vehicles) that are incompatible with existing uses already served by the area's road system during either construction or operations.

Construction would also require temporary work in East 220th Street and Bonita Street and portions of traffic lanes would be closed. No full road closures are anticipated. The project would implement a traffic control plan to be prepared by the contractor and approved by the City Engineer. All lane closures would be performed pursuant to the traffic control plan. With implementation of the traffic control plan, there would be no changes that would affect the safety and accessibility of the transportation system. Therefore, impacts associated with hazardous design features or incompatible land uses during construction of the project would be less than significant.

Operations

Less-Than-Significant Impact. Access to the site would be provided from existing city streets and from the existing park driveway. There would be no changes to the existing off-site circulation on City roads. Therefore, the project would not substantially increase hazards due to a roadway design feature or introduce incompatible uses during operation of the project. Impacts would be **less than significant**.

d) Would the project result in inadequate emergency access?

Construction

Less-Than-Significant Impact. The project site is located in an established, developed area with sufficient access for emergency service providers. Construction would require temporary work in East 220th Street and Bonita Street, which would require closing portions of the travel lanes. However, construction activities would occur on the project site and no full road closures in the public right-of-way or driveway closures are anticipated that would impact adopted emergency access or response plans. As part of the traffic control plan, the contractor would follow standard construction practices and ensure that adequate on-site circulation and access is always maintained for all users, including coordinating with local emergency response providers (local police, fire, and medical dispatch) regarding proposed construction activities. As such, construction of the project would have a **less-than-significant impact** related to emergency access.

Operations

Less-than-Significant Impact. As previously discussed, the project site is located in an established, developed area with sufficient access for emergency service providers. There would be no changes to the existing off-site circulation on City roads during project operations. As such, operation of the project would have a **less-than-significant impact** related to emergency access.

3.18 Tribal Cultural Resources

a California Native American tribe.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact	
XVIII. TRIBAL CULTURAL RESOURCES					
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or			\boxtimes		
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to					

The evaluation of potential impacts to Tribal Cultural Resources (TCRs) is primarily based on the findings resulting from tribal consultation conducted by the City, as the lead agency, as well as the findings of Section 3.5, Cultural Resources, in this MND. Background research and fieldwork conducted to inform this analysis include a NAHC SLF search, archival research and CHRIS database records search, a pedestrian survey of the project site, and the results of formal tribal consultation pursuant to California AB 52.

The project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to TCRs as part of the CEQA process, and that the lead agency notify California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed project. All NAHC-listed California Native American Tribal representatives that have requested project notification pursuant to AB 52 were sent letters by the City on April 30, 2025. The notification letters contained a project description, outline of AB 52 timing, an invitation to consult, a project site figure, and contact information for the appropriate lead agency representative. To date, one response has been received by the City from the Santa Rosa Band of Cahuilla Indians deferring any comments to the Sobaba Band of Luiseno Indians. A response was not received from the Sobaba Band of Luiseno Indians.

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

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

Less-Than-Significant Impact. As discussed in Section 3.5, Cultural Resources, no previously recorded archaeological resources of Native American origin or TCRs listed in the California Register of Historical Resources or a local register were identified within the project area as a result of the SCCIC records search, the NAHC SLF results, or the pedestrian survey. Additionally, the City notified California Native American Tribal representatives who are traditionally or culturally affiliated with the geographic area of the project pursuant to AB 52. As discussed above, one response was received from the Santa Rosa Band of Cahuilla Indians deferring any comments to the Sobaba Band of Luiseno Indians. A response was not received from the Sobaba Band of Luiseno Indians. Therefore, the project would not adversely affect TCRs that are listed or eligible for listing in the state or local register. Impacts would be **less than significant**.

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

Less Than Significant Impact with Mitigation Incorporated. The project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to TCRs as part of the CEQA process and requires lead agencies to provide notification of proposed projects to California Native American Tribal representatives that have requested such notifications.

No TCRs were identified as a result of the response provided from the Santa Rosa Band of Cahuilla Indians. However, in an abundance of caution and in an effort to protect unknown TCRs, the City has developed mitigation measures (MM-CUL-1 through MM-CUL-3), as outlined in Section 3.5, Cultural Resources, to ensure the proper treatment of unknown subsurface cultural and tribal cultural resources in the event of an inadvertent discovery. Impacts would be less than significant with mitigation.

3.19 Utilities and Service Systems

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX	. UTILITIES AND SERVICE SYSTEMS - Would th	e project:			
a)	Require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?				
c)	Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
d)	Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				

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

Less-than-Significant Impact. The project includes the construction of a stormwater capture and treatment facility and improvements to the existing Calas Park. The proposed stormwater facility would intercept stormwater and dry-weather flow from existing storm drain channels within East 220th Street and route it into the filtration facility, where it would be allowed to infiltrate into underlying soils or it would be treated and discharged into an existing catch basin. The proposed pump associated with the treatment facility would be electrically powered, thus requiring an additional connection to the electrical power that currently serve the park's lights and irrigation system. Connection to these existing distribution facilities would be sufficient for providing power to the project and would not require any other relocation or construction of electrical power facilities. The project would also require

reconstruction of minor existing water infrastructure in the removal and replacement of the existing irrigation pipes and sprinkler heads. These minor improvements are features of the project that would be subject to engineering design to ensure adjacent facilities and users are not negatively affected. Any relocation of existing facilities would not be substantial enough to result in a significant impact pursuant to CEQA. Impacts would be **less than significant**.

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

Less-than-Significant Impact. Project construction would temporarily require a minor amount of water primarily associated with site watering in compliance with SCAQMD Rule 403 to prevent, reduce, or mitigate fugitive dust emissions from construction activities. Once construction is complete, operational changes in water use would include the minor irrigation changes. Other existing components of the park that require water would not change their existing usage. As such, operation of the project would not demand additional water use. Therefore, impacts would be **less than significant**.

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

No Impact. Construction and operation of the project would not generate wastewater demand. Therefore, **no impacts** would occur.

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

Less-than-Significant Impact. During construction, the project would generate solid waste such as residual wastes, plastics, and soils. Construction-generated solid waste would be temporary and would cease once construction is completed. Solid waste generated by project construction would be properly disposed of at designated landfill facilities for construction and demolition debris. In 2011, California AB 341 was passed, establishing a state goal to reduce, recycle, or compost no less than 75% of waste generated by the year 2020. Operation of the project would not generate any substantial additional solid waste beyond current park conditions. As such, solid waste generated by the project would not exceed state or local standards or the capacity of local infrastructure. Impacts would be **less than significant**.

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

No Impact. As discussed in Section 3.19(d), Utilities and Service Systems, construction-generated solid waste would be temporary, and operation of the project would not generate substantially more solid waste than existing conditions. Solid waste generated by the project construction would be disposed of at designated landfill facilities under federal, state, and local regulation. Additionally, the project would be required to adhere to City and county ordinances with respect to waste reduction and recycling. As a result, no impacts related to state and local statutes governing solid waste are anticipated.

3.20 Wildfire

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX.	 WILDFIRE – If located in or near state respon severity zones, would the project: 	sibility areas or l	ands classified as	s very high fire h	azard
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?				
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			\boxtimes	
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				

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

Less-than-Significant Impact. According to the CAL FIRE Hazard Severity Zone Viewer, the project site is located within a Local Responsibility Area and is not located within a Very High Fire Hazard Severity Zone (CAL FIRE 2024). The City has prepared a Draft Hazard Mitigation Plan. The hazard mitigation plan is a document that contains information to assist communities in reducing risk from hazards by identifying resources, information, and strategies for risk reduction (City of Carson 2024). A stormwater diversion structure would be constructed to connect the proposed system to existing storm drains under East 220th Street and Bonita Street. Additionally, an underground storage reservoir installed beneath the baseball/softball and soccer outfields at Calas Park would be connected directly to the diversion pipeline and an outflow pipeline for sending water back into an existing catch basin beneath East 220th Street. As such, project construction would require the temporary partial closures of East 220th Street and small portion of Bonita Street. The temporary partial closures of East 220th Street and Bonita Street would be performed pursuant to a traffic control plan prepared by the contractor and subject to City approval, which would demonstrate that emergency access or evacuation would not be impeded. Traffic on East 220th Street and Bonita Street would resume to existing conditions upon completion of the project. Impacts would be less than significant.

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

Less-than-Significant Impact. Construction of the project would comply with Article III, Chapter 1 of the City's Municipal Code, which adopts the Los Angeles County Fire Code by reference, which is based on the California Fire Code with amendments and additions. Chapter 33 of the California Fire Code outlines general fire safety precautions during construction and demolition that are intended to maintain minimum levels of fire protection and limit the spread of fire. The project would not include structures intended for long-term occupancy. Furthermore, the project site is relatively flat and would not influence prevailing winds or other factors that could exacerbate wildfire risk. As such, the project would not exacerbate wildfire risks such that project users would be exposed to pollutants concentrations. Impacts would be less than significant.

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

Less-than-Significant Impact. As discussed previously, the project overall would not exacerbate fire risk. Construction would comply with California Fire Code requirements to manage and minimize fire risk during construction. Operation of the project would not contain potential sources for fire risk. As such, the project would not result in installation or maintenance of associated infrastructure that may exacerbate fire risk. Impacts would be **less than significant**.

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

Less-than-Significant Impact. For reasons described previously in Sections 3.9(g) and 3.20(a), (b), and (c), the project would not pose a substantial risk for wildfire. The project would be located on relatively flat land within Calas Park. As such, implementation of the project would not expose people or structures to significant risks from post-fire slope instability or drainage changes. Impacts would be **less than significant**.

3.21 Mandatory Findings of Significance

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI	. MANDATORY FINDINGS OF SIGNIFICANCE		,	,	,
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)				
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		\boxtimes		

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

Less Than Significant Impact with Mitigation Incorporated. Potential impacts related to sensitive and special-status habitat, wildlife species, and plant species are discussed in Section 3.4, Biological Resources. As discussed in Section 3.4, Biological Resources, all potentially significant impacts to biological resources would be reduced to a level below significance with incorporation of mitigation measures. The proposed project would not substantially degrade the quality of the environment or impact fish or wildlife species or plant communities. As discussed in Section 3.5, Cultural Resources, potential impacts to cultural resources would be reduced to a level below significance with incorporation of mitigation measures. The proposed project would not eliminate important examples of the major periods of California history or prehistory. Overall, impacts would be less than significant with incorporation of mitigation measures.

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

Less Than Significant Impact with Mitigation Incorporated. As indicated in the analysis presented throughout Chapter 3, Initial Study Checklist, of this MND, the proposed project would not result in significant and unavoidable impacts in any issue area. Mitigation measures would reduce impacts to below a level of significance.

Cumulative projects in the City include the Imperial Avalon Specific Plan, the District at South Bay Specific Plan, and the Perry Street Residences located at 21611 Perry Street, approximately 0.36 miles northeast of the project site; the Dutch Bro's Coffee project located at 20377 Avalon Boulevard, approximately 1.45 miles north of the project site; the Carson Triangle project located at 21140, 21212, and 21126 Avalon Boulevard, located approximately 0.78 miles north of the project site; the ASPCA Animal Clinic project located at 16300 South Figueroa Street, approximately 4.14 miles north of the project site; the Shell Compressed Natural Gas Dispensing Station project located at 20945 South Wilmington Avenue, approximately 0.97 miles northeast of the project site; and the Carson to Paramount Hydrogen Gas Pipeline project located at 23300 South Alameda Street, approximately 1.78 miles southeast of the project site. The project is not located in the immediate vicinity of any large cumulative projects whose construction phase would overlap to create cumulative impacts. The proposed project, as with potential cumulative projects, would incorporate mitigation measures to reduce impacts, as applicable, particularly during construction. Upon completion of construction, the proposed project would have no potential to contribute to a cumulative impact. Impacts would be less than significant with incorporation of mitigation measures.

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

Less Than Significant Impact with Mitigation Incorporated. The potential for adverse direct or indirect impacts to human beings was considered throughout Chapter 3 of this MND. Based on this evaluation, there is no substantial evidence that construction or operation of the project with the proposed mitigation measures incorporated would result in a substantial adverse effect on human beings. Impacts would be less than significant with incorporation of mitigation measures.

CALAS PARK STORMWATER AND WATER QUALITY IMPROVEMENTS SUPPLEMENTAL ENIVRONMENTAL PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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4.2 List of Preparers

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Figure 1 Project Location

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Figure 2 Project Site and Existing Features

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Figure 3 Project Stormwater Capture and Treatment System

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Figure 4 Vegetation Communities and Land Cover Types

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Figure 5 Noise Measurement Locations

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Appendix A

Air Quality and Greenhouse Gas Modeling

Appendix B

Construction Health Risk Assessment Modeling

Appendix CBiological Resources Species List

Appendix D

Calas Park Cultural Resources Inventory Report

Appendix EEnergy Calculations

Appendix F

Confidential Paleontological Resources Record Search

Appendix GNoise Assessment Data