January 2020

19500 Main Street Digital Billboards Project

Initial Study/Mitigated Negative Declaration

Prepared for
City of Carson

Prepared by

Michael Baker
INTERNATIONAL

PUBLIC REVIEW DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

19500 Main Street Digital Billboards Project

Lead Agency:

CITY OF CARSON
701 East Carson Street
Carson, California 90745
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January 17, 2020

JN 175487

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1.0 INTRODUCTION

The 19500 Main Street Digital Billboards Project (herein referenced as the "project") would replace an existing traditional billboard with a double-sided digital sign structure and install a new double-sided digital sign structure on a vacant lot located adjacent to northbound Interstate 405 (I-405) at 19500 Main Street, Carson, California; refer to Section 2.0, *Project Description*. Following a preliminary review of the proposed project, the City of Carson (City) has determined that it is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study addresses the direct, indirect, and cumulative environmental effects of the project, as proposed.

1.1 STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with the CEQA (Public Resources Code Section 21000-21177) and pursuant to California Code of Regulations Section 15063, the City of Carson, acting in the capacity of Lead Agency under CEQA, is required to undertake the preparation of an Initial Study to determine if the proposed project would have a significant environmental impact. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that any aspect of the project may cause a significant environmental effect, the Lead Agency shall further find that an Environmental Impact Report (EIR) is warranted to analyze project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency shall find that the proposed project would not have a significant effect on the environment and shall prepare a Negative Declaration for that project. Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such impacts may occur (Public Resources Code Section 21080(c)).

The environmental documentation, which is ultimately selected by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and/or other discretionary approvals would be required.

The environmental documentation is subject to a public review period. During this review, public agency comments on the document relative to environmental issues should be addressed to the City. Following review of any comments received, the City will consider these comments as a part of the project's environmental review and include them with the Initial Study documentation for consideration by the City.

1.2 PURPOSE

CEQA Guidelines Section 15063 identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include:

- A description of the project, including the location of the project;
- Identification of the environmental setting;
- Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- Discussion of ways to mitigate significant effects identified, if any;
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls; and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

1.3 CONSULTATION

As soon as a Lead Agency (in this case, the City of Carson) has determined that an Initial Study would be required for the project, the Lead Agency is directed to consult informally with all Responsible Agencies and Trustee Agencies that are responsible for resources affected by the project, to obtain the recommendations of those agencies as to whether an EIR or Negative Declaration should be prepared for the project. Following receipt of any written comments from those agencies, the Lead Agency considers any recommendations of those agencies in the formulation of the preliminary findings. Following completion of this Initial Study, the Lead Agency initiates formal consultation with these and other governmental agencies as required under CEQA and its implementing guidelines.

1.4 INCORPORATION BY REFERENCE

The following documents were utilized during preparation of this Initial Study and are incorporated into this document by reference. The documents are available for review at the City of Carson, Community Development Department – Planning Division, 701 East Carson Street, Carson, California 90745.

- *Carson General Plan* (October 11, 2004). The *Carson General Plan* (General Plan), adopted October 11, 2004, provides guidance to City decision-makers to evaluate land use changes, determine funding and budget recommendations and decisions, and to evaluate specific development proposals. The General Plan allows City staff to regulate building and development and to make recommendations on projects, as well as allowing residents, neighborhood groups, and the community to better understand the long-range plans and vision of the City. The General Plan includes the following elements: Land Use, Economic Development, Transportation and Infrastructure, Housing, Safety, Noise, Open Space and Conservation, Parks, Recreation and Human Services, and Air Quality.

- *Carson General Plan Environmental Impact Report* (July 11, 2003). The *Carson General Plan Environmental Impact Report* (General Plan EIR), certified July 11, 2003, evaluates the impacts associated with implementation of General Plan. The General Plan EIR evaluates potential environmental impacts and identifies mitigation measures to reduce or avoid possible environmental damage. Mitigation measures were identified for Geologic and Seismic Hazards, Hydrology and Drainage, Public Health and Safety, and Cultural Resources. With the application of feasible mitigation measures, some impacts could not be reduced to less-than-significant levels. Significant and unavoidable impacts were identified for transportation, air quality, noise, hydrology, school facilities, and public health and safety. The General Plan EIR was recirculated to provide additional information regarding potential impacts associated with the revised Land Use Plan of the proposed General Plan. This Carson Recirculated General Plan EIR (Recirculated General Plan EIR) was incorporated with the original General Plan EIR and the responses to comments on both the General Plan EIR and the Recirculated General Plan EIR to comprise the Final General Plan EIR.

- *City of Carson Municipal Code* (Current through Ordinance No. 19-1936, passed September 3, 2019). The Carson Municipal Code (Municipal Code) provides regulations for government administrative operations, construction, development, infrastructure, public safety, and business operations within the City. The Zoning Ordinance (Article IX of the Municipal Code) is intended to serve the public health, safety, comfort, convenience and general welfare by establishing land use districts designed to obtain the physical, environmental, economic and social advantages resulting from planned use of land in accordance with the General Plan. The Zoning Ordinance provides a set of regulations which control the land uses, the density of population, the uses and locations of structures, the height of buildings and structures, the ground coverage and open spaces required for uses and structures, the appearance of certain uses and structures, the areas and dimensions of sites, the location, size and illumination of signs and displays, requirements for off-street parking and off-street loading facilities, provisions for street dedications and improvements, standards for water efficient landscaping, and procedures for administering and amending such regulations and requirements.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The City of Carson (City) is located in the South Bay/Harbor area of the County of Los Angeles, approximately 13 miles south of downtown Los Angeles; refer to Exhibit 2-1, *Regional Vicinity*. The City consists of 19.2 square miles and is surrounded by the City of Los Angeles to the north, southeast, south, and northwest. The City of Compton is located to the northeast and the City of Long Beach is adjacent to the east. Unincorporated portions of Los Angeles County are also located to the north, east, and southwest.

The proposed 19500 Main Street Digital Billboards Project (project) site is located at 19500 Main Street (Assessor's Parcel Number [APN] 7339-017-003); refer to Exhibit 2-2, *Site Vicinity*. Regional access to the site is provided via the San Diego Freeway (Interstate 405 [I-405]). Local access to the site is provided via Main Street.

2.2 ENVIRONMENTAL SETTING

The project site is currently vacant land situated along I-405. Three existing double-sided static/traditional sign structures and one single static/traditional sign structure are present on the project site, operated by Clear Channel Outdoor; refer to Exhibit 2-3, *Existing Signs*. A static sign structure is a traditional "print" display that is not digital or have an active and changing display. Sign Numbers 3065/3066 are mounted on a single support structure while Sign Numbers 3067 through 3071 are mounted on independent support structures. A description of the existing sign structures is presented in Table 2-1, *Existing Signs*.

Table 2-1
Existing Signs

Sign No.[1]	Sign Type	Height (feet)[2]	Display Area Dimensions (feet)
3065/3066	Double-Sided Static/Traditional	± 54'	14' x 48'
3067	Single Static/Traditional	± 51'2"	14' x 48'
3068/3069	Double-Sided Static/Traditional	± 55'10"	14' x 48'
3070/3071	Double-Sided Static/Traditional	± 44'	14' x 48'

Notes:
1. Sign reference numbers correlate to each billboard face, as depicted on Exhibit 2-3.
2. All heights are given as height above freeway grade.

Topographically, the project site is gently sloping with nominal changes in elevation. The site contains minimal vegetation; however, low-lying grasses and shrubs are dispersed throughout. The project site is accessed via a fenced driveway at Main Street.

NOT TO SCALE

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19500 MAIN STREET DIGITAL BILLBOARDS PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Regional Vicinity

Exhibit 2-1

Source: Google Earth Pro, 2019.
- Project Boundary

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Site Vicinity

Exhibit 2-2

Source: Google Earth Pro, 2019.

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Existing Signs

Exhibit 2-3

GENERAL PLAN LAND USE DESIGNATION AND ZONING

Based on the *Carson General Plan* (General Plan) Land Use Map, the project site is designated Regional Commercial (RC). The RC designation is intended to serve a broad population base and offer a wide range of services to both the community and the region. Businesses in this designation may include major department stores, specialty shops, other retail and service uses, automobile and other vehicle dealerships, and hotels and motels.

Based on the *City of Carson Zoning Map*, the project site is zoned Commercial, Regional with a Design and Organic Refuse Landfill Overlay (CR-D-ORL). The CR zone is intended primarily for a major commercial center with a full range of retail merchandise and services that serves a community or subregional area. The "D" Overlay allows for special site plan and design review for selected areas throughout the City, and the "ORL" Overlay is related to the former organic refuse landfill use of the site, which is further described in Section 2.3, *Background and History*.

SURROUNDING LAND USES

Surrounding land uses include a mixture of transportation, light industrial, open space, and public facility uses. Specifically, land uses surrounding the project site include:

- *North:* Main Street; the Dominguez Channel, designated General Open Space and zoned Open Space (OS); and light industrial uses, designated Light Industrial and zoned Manufacturing Light with a Design Overlay (ML-D), are located to the north of the project site.

- *East:* The Dominguez Channel bounds the project site to the east. The Goodyear Blimp Base Airport, designated Public Facilities and zoned Special Use Blimp Port with a Design and Organic Refuse Landfill Overlay (SU-BP-D-ORL); and The Links at Victoria Golf Course, designated Recreational Open Space and zoned Open Space with an Organic Refuse Landfill Overlay (OS-ORL), are located east of the Dominguez Channel.

- *South:* Del Amo Boulevard and I-405 are located to the south of the project site.

- *West:* I-405 bounds the project site to the west with the Porsche Experience Driving Center, designated Mixed Use – Business Park and zoned CR-D-ORL, located further west of I-405.

2.3 BACKGROUND AND HISTORY

The project site was a former organic refuse landfill site (Ben K. Kazarian [BKK] Carson Dump) and is on the Cortese List pursuant to Government Code Section 65962.5. Government Code Section 65962.5(a)(1) requires that the Department of Toxic Substances Control (DTSC) "shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: ….(1) [a]ll hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC)." The hazardous waste facilities identified in HSC Section 25187.5 are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under HSC Section 25187, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment

The former landfill site encompasses 351 acres in the City and was utilized as a municipal and commercial waste dump between 1948 and 1959. According to DTSC, the BKK Carson Dump was permitted to accept inert solid fill (e.g., rock, concrete, and earth), household and commercial refuse (e.g., paper wood, rubber shrubbery, and paint sludge), garbage (e.g., animal and vegetable products), and liquids and semi-liquids (e.g., drilling muds and printer's ink). Documents indicate that a minimum of three feet of earth was placed over the refuse following landfill closure in 1959.

Following the BKK Carson Dump closure, the landfill investigation and cleanup activities (under the oversight of the DTSC) were divided into two geographical areas, physically divided by the Dominguez Channel. These areas are referred to as Operable Unit 1 (OU-1) and Operable Unit 2 (OU-2). The project site is located within OU-1 and is the only parcel within OU-1 that has not undergone remediation. Refer to Section 4.9, *Hazards and Hazardous Materials*, for additional information regarding the site's former use as an organic refuse landfill site.

2.4 PROJECT CHARACTERISTICS

The proposed project would entail: 1) the installation of a new double-sided digital sign structure; and, 2) the removal of an existing single-sided traditional sign structure and replacement with a double-sided digital sign structure.

DIGITAL SIGN STRUCTURE SPECIFICATIONS

New Sign Location

The new double-sided digital sign structure would be located between existing Signs 3068/3069 and Signs 3070/3071; refer to Exhibit 2-4, *New Sign Location*. The display faces would each be 14 feet high by 48 feet wide for a total digital display area of 672 square feet per sign face.

The double-sided digital signs would be installed on a vertical column supporting structure with a maximum height of 55 feet. The supporting structure would hold both digital displays oriented in a "V" shape so as to simultaneously face traffic traveling along the northbound and southbound lanes of I-405.

Sign Conversion Location

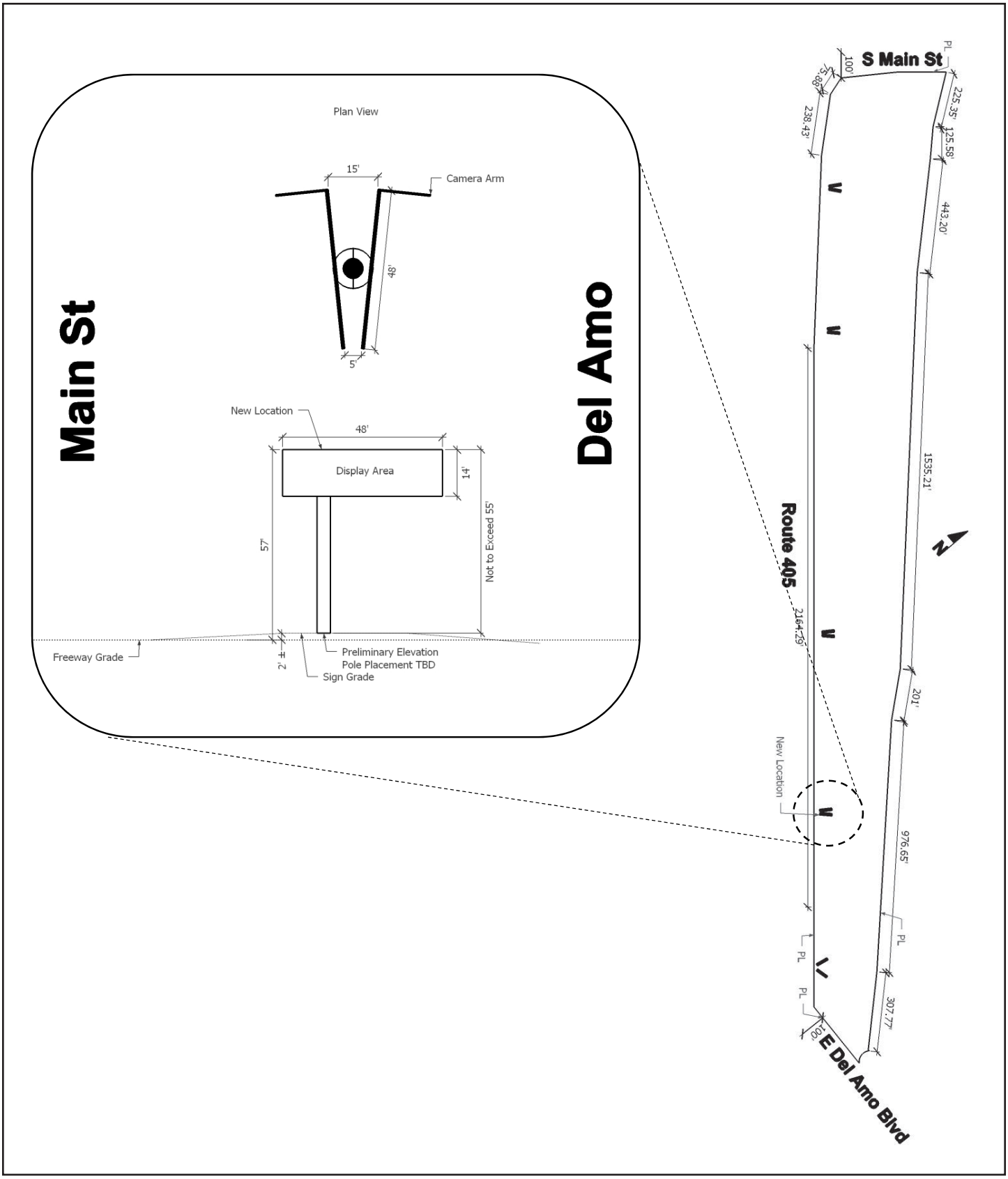
As shown on Exhibit 2-5, *Sign Conversion Location*, the existing static/traditional billboard (Sign 3067) would be converted to a double-sided digital sign structure. Similar to the new sign, each display face would be 14 feet high by 48 feet wide with a total digital display area of 672 square feet per sign face.

The converted double-sided digital sign would also be installed on a vertical supporting structure to a maximum height of 65 feet. The digital displays would similarly be oriented in a "V" shape.

OPERATIONS

Project operations would include displaying alternating still images (advertisements) on both sides of the digital sign structures. Each image projected on the digital display would be static for a minimum of eight (8) seconds prior to changing to a new image. Still images would not contain flashing lights, animation, movement, or varying light intensities.

Additionally, each digital sign would be equipped with light sensors to measure ambient light levels to ensure lighting levels on the digital signs do not exceed 0.3 foot candles over ambient light levels. For example, the digital signs would generally be brighter in the daytime and dimmer at nighttime. The digital signs would be controlled remotely and, once installed, would require approximately two to three visits per year for maintenance purposes. A nominal amount of trips may also be required for LED display maintenance over the project's lifetime.



Source: Clear Channel Outdoor, July 31, 2019.

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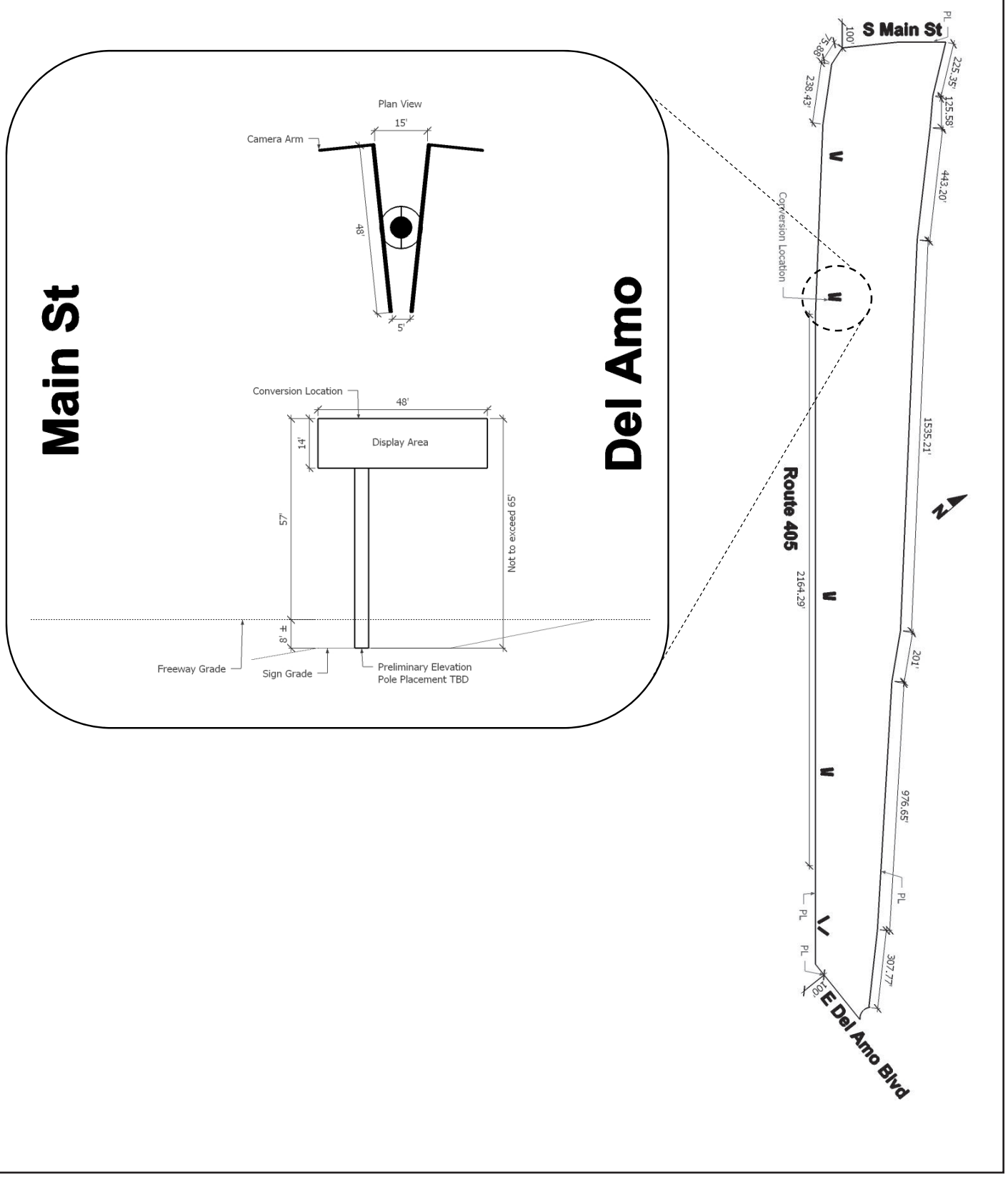
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

New Sign Location

Exhibit 2-4



Source: Clear Channel Outdoor, July 31, 2019.

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Sign Conversion Location

Exhibit 2-5

DEVELOPMENT AGREEMENT

All outdoor advertising signs are subject to the approval of a Development Agreement. The Development Agreement for the two proposed double-sided digital sign structures would provide assurance to the project Applicant that the project would proceed subject to the rules and regulations in effect at the time of project approval and provide assurance to the City that the project Applicant would construct the project as proposed.

ZONE TEXT AMENDMENT

Under *City of Carson Municipal Code* (Municipal Code) Section 9146.7 A (3), outdoor advertising signs are not permitted in the proposed location. Thus, a Zone Text Amendment is required as part of the project to permit the proposed digital sign structures within the commercial zoned project site. The proposed amendment to Municipal Code Section 9146.7 A (3), if approved, would read:

> For purposes of this Section, the term "I-405 Freeway Corridor" means that portion of the I-405 Freeway that is on the north side of the I-405 Freeway and that is also between ~~Main Street~~ Del Amo Boulevard and Figueroa Street ("~~Main Street~~ Del Amo Boulevard Portion") and that portion of the I-405 Freeway that is between the west line of Alameda Street and a point that is two thousand one hundred (2,100) feet west of the west line of Alameda Street ("Alameda Street Portion").[1]

CONDITIONAL USE PERMIT

Under Municipal Code Section 9131.12, *Uses Permitted on Organic Refuse Landfill Sites*, any use proposed on a property designated as ORL (Organic Refuse Landfill) can only be permitted through a Conditional Use Permit. Since this property is designated ORL Overlay, the proposed outdoor advertising signs require a Conditional Use Permit as part of the development application.

VARIANCE

Under Municipal Code Section 9172.22, *Variance*, two Variances are required to permit additional height for the sign conversion location (3067) and new sign due to the unique location of the proposed double-sided digital sign structures and topographical constraints of the signs' influence areas.

OUTDOOR ADVERTISING DISPLAY PERMIT

Pursuant to the Federal Highway Beautification Act and State Outdoor Advertising Act, the California Department of Transportation (Caltrans) is responsible for regulating the placement of outdoor advertising displays visible from State highways and performing regular reviews of outdoor advertising displays adjacent to freeways and highways identified on the national highway system. The project would be subject to Caltrans approval of an Outdoor Advertising (ODA) Display Permit, which would ensure the project meets several location and design features, including, but not limited to:

- The display must be located outside the right-of-way of any highway;
- There must be an existing business activity within 1,000 feet of proposed display location on either side of the highway;
- Location of property where display is to be placed must be zoned industrial or commercial;
- The display must be 500 feet from any other permitted display on the same side of any highway that is a freeway; and

1 A double-underline indicates additions to the Municipal Code; ~~strikethrough~~ indicates deletions to the Municipal Code.

- The maximum height for each advertising display area is, 25 feet in height and 60 feet in length, not to exceed an overall maximum of 1,200 square feet.

2.5 PHASING/CONSTRUCTION

Construction of the proposed project is anticipated to occur in March 2020 and take approximately four weeks to install both double-sided digital sign structures. Approximately 40 cubic yards of export would be required to dig the foundation hole for the vertical supporting structures (20 cubic yards per sign structure). All excavated soils would be disposed of in accordance with DTSC requirements.

2.6 AGREEMENTS, PERMITS, AND APPROVALS

The proposed project would require agreements, permits, and approvals from the City and other agencies prior to construction. These agreements, permits, and approvals are described below and may change as the project entitlement process proceeds.

City of Carson – Lead Agency

- California Environmental Quality Act Clearance;
- Development Agreement;
- Zone Text Amendment;
- Conditional Use Permit; and
- Variance.

California Department of Transportation – Responsible Agency

- Outdoor Advertising (ODA) Display Permit.

California Department of Toxic Substances Control – Responsible Agency

- Geotechnical Investigation Review (refer to Section 4.9).

Los Angeles Regional Water Quality Control Board – Responsible Agency

- Dewatering Permit.

3.0 INITIAL STUDY CHECKLIST

3.1 BACKGROUND

1. **Project Title:**
   19500 Main Street Digital Billboards Project

2. **Lead Agency Name and Address:**
   City of Carson
   701 East Carson Street
   Carson, California 90745

3. **Contact Person and Phone Number:**
   Manraj Bhatia, Assistant Planner
   City of Carson
   310.952.1761 Ext. 1768

4. **Project Location:**
   The proposed project is located at 19500 Main Street in the City of Carson, California.

5. **Project Sponsor's Name and Address:**
   Clear Channel Outdoor, LLC
   19320 Harborgate Way
   Torrance, California 90501

6. **General Plan Designation:**
   Regional Commercial (RC)

7. **Zoning:**
   Commercial, Regional with a Design and Organic Refuse Landfill Overlay (CR-D-ORL)

8. **Description of Project:**
   Refer to Section 2.4, *Project Characteristics*.

9. **Surrounding Land Uses and Setting:**
   Surrounding land uses include a mixture of transportation, light industrial, open space, and public facility uses. Specifically, land uses surrounding the project site are as follows:

   - *North*: Main Street; the Dominguez Channel, designated General Open Space and zoned Open Space (OS); and light industrial uses, designated Light Industrial and zoned Manufacturing Light with a Design Overlay (ML-D), are located to the north of the project site;

   - *East*: The Dominguez Channel bounds the project site to the east. The Goodyear Blimp Base Airport, designated Public Facilities and zoned Special Use Blimp Port with a Design and Organic Refuse Landfill Overlay (SU-BP-D-ORL); and The Links at Victoria Golf Course, designated Recreational Open Space and zoned Open Space with an Organic Refuse Landfill Overlay (OS-ORL), are located east of the Dominguez Channel;

   - *South*: Del Amo Boulevard and I-405 are located to the south of the project site; and,

- *West*: I-405 bounds the project site to the west with the Porsche Experience Driving Center, designated Mixed Use – Business Park and zoned CR-D-ORL, located further west of I-405.

10. **Other public agencies whose approval is required:**
    California Department of Transportation and Department of Toxic Substances Control.

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.?**
    In compliance with AB 52, the City distributed letters to applicable Native American tribes informing them of the project on November 25, 2019. No Native American tribes requested consultation during the project's 30-day consultation period.

3.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant Impact with Mitigation Incorporated," as indicated by the following checklist.

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

3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

This Initial Study analyzes the potential environmental impacts associated with the proposed project. The issue areas evaluated include:

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

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by the CEQA Guidelines Appendix G and used by the City of Carson in its environmental review process. For the preliminary environmental assessment undertaken as part of this Initial Study's preparation, a determination that there is a potential for significant effects indicates the need to more fully analyze the development's impacts and to identify mitigation.

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the development. To each question, there are four possible responses:

- *No Impact*. The development will not have any measurable environmental impact on the environment.

- *Less Than Significant Impact*. The development will have the potential for impacting the environment, although this impact will be below established thresholds that are considered to be significant.

- *Less Than Significant Impact With Mitigation Incorporated*. The development will have the potential to generate impacts which may be considered as a significant effect on the environment, although mitigation measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.

- *Potentially Significant Impact*. The development will have impacts which are considered significant, and additional analysis is required to identify mitigation measures that could reduce these impacts to less than significant levels.

Where potential impacts are anticipated to be significant, mitigation measures will be required, so that impacts may be avoided or reduced to insignificant levels.

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4.0 ENVIRONMENTAL ANALYSIS

4.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?				✓
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings 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) Have a substantial adverse effect on a scenic vista?

No Impact. According to the General Plan EIR, there are no officially designated scenic vistas or visual resources within the City of Carson. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

b) 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 officially-designated State scenic highways in the City of Carson.[1] Further, the General Plan does not identify any scenic highways, roadways, or corridors within the City. The nearest scenic highway is State Route 1 (SR-1) (designated as eligible for listing), which is located approximately 12 miles to the southeast of the project site. The project would not substantially damage scenic resources within a State scenic highway. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

[1] California Department of Transportation, *List of Eligible and Officially Designated State Scenic Highways*, updated March 2017.

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?

Less Than Significant Impact. As discussed in Section 2.2, *Environmental Setting*, the project site is currently vacant land situated along I-405 and is surrounded on all sides by urbanized uses. Three existing double-sided static/traditional sign structures and one single static/traditional sign structure are present on the project site; refer to Exhibit 4.1-1, *Existing Conditions Photographs*. As the project is primarily surrounded by urbanized uses in all directions, project implementation is not anticipated to degrade the existing visual character or quality of public views of the site or its surroundings. The following discussion analyzes the project's potential to conflict with applicable zoning and other regulations governing scenic quality.

CONSTRUCTION

As discussed in Section 2.5, *Phasing/Construction*, installation of the double-sided digital sign structures would occur over a period of four weeks. As a result, construction-related visual impacts are considered to be temporary and would cease upon construction completion. The project's potential to conflict with applicable zoning or regulations during construction would be less than significant in this regard.

OPERATIONS

Municipal Code Section 9146.7, Signs, includes the City's site development standards for outdoor advertising sings. Table 4.1-1, *Municipal Code Consistency Analysis*, provides a consistency analysis of the proposed project and relevant development standards for outdoor advertising signs.

Table 4.1-1
Municipal Code Consistency Analysis

Relevant Section	Consistency Analysis
9146.7 A (1): The total sign face area on each I-405, I-110 or SR-91 Freeway Corridor sign structure or any pre-Ordinance No. 01-1237 sign structure shall not exceed eight hundred (800) square feet and digital displays can be installed on said sign face areas if approved within a development agreement, with appropriate conditions and public benefits to be negotiated with the City and complying with all other conditions imposed by this Chapter. The interval between the change of digital display shall be a minimum of eight (8) seconds. The total sign face area on any other new sign structure shall not exceed one hundred fifty (150) square feet and digital displays are not allowed on these other new sign structures.	**Consistent.** As discussed in Section 4.11, *Land Use and Planning*, a Zone Text Amendment is required as part of the project to permit the proposed digital sign structures within the commercial zoned project site. The proposed amendment to Municipal Code Section 9146.7 A (3), if approved, would allow digital sign structures between Main Street and Figueroa Street (inclusive of the project site). Upon approval of the proposed Zone Text Amendment, the proposed project would be considered a part of the "I-405 Freeway Corridor" and would not conflict with applicable zoning requirements; refer to Section 4.11. Similar to existing sign structures that are present on the project site, the displays for the new double-sided digital sign structures would be 14 feet high by 48 feet wide for a total digital display area of 672 square feet per sign face. As a result, the total sign face on each double-sided digital sign structure would not exceed 800 square feet. Each image projected on the digital display would be static for a minimum of eight (8) seconds prior to changing to a new image. Still images would not contain flashing lights, animation, movement, or varying light intensities. The project

Table 4.1-1, continued

Relevant Section	Consistency Analysis
	would be consistent with Municipal Code Section 9146.7 A (1) in this regard.
9146.7 A (2): The height of an I-405, I-110 or SR-91 Freeway Corridor sign structure or any pre-Ordinance No. 01-1237 sign structure shall either be the height of the current off-premises sign if said sign is being rebuilt or maintained on the same parcel of land or if the proposed off-premises sign is not replacing an existing off-premises sign on the same parcel of land, then said sign shall not exceed forty-two (42) feet measured from the higher of either the ground level at the base of the sign structure or the finished grade of the road which the sign is advertising thereto. The height of any other new sign structure shall not exceed twenty (20) feet measured from the ground level at the base of the sign structure.	**Consistent.** Under Municipal Code Section 9172.22, *Variance*, two Variances are required to permit additional height for the sign conversion location (Sign 3067) and new sign due to the unique locations of the proposed double-sided digital sign structures and topographical constraints of the signs' influence areas. As shown on Exhibit 2-4, *New Sign Location*, the new sign structure would be installed on a vertical supporting structure to a maximum height of 55 feet. As shown on Exhibit 2-5, *Sign Conversion Location*, the existing static, traditional billboard (Sign 3067) would be replaced with a double-sided digital sign structure. The converted double-sided digital sign would also be installed on a vertical supporting structure to a maximum height of 65 feet. Similar to existing sign structures that are present on the project site, the displays for the new double-sided digital sign structures would be 14 feet high by 48 feet wide for a total digital display area of 672 square feet per sign face. As illustrated on Exhibit 4.1-2, *Existing and Proposed Sign Structure Elevations*, the overall dimensions of the new double-sided digital sign structures would appear similar to existing sign structures on the project site, which range in height from approximately 44 feet to 55 feet, 10 inches and have a total display area of 672 square feet per sign face; refer to Table 2-1, *Existing Signs*. Thus, upon approval of the proposed Variances, the project would not conflict with Municipal Code Section 9146.7 A (2) in this regard.
9146.7 A (3): A new sign structure shall be erected only on a property that abuts the Alameda Corridor or abuts either the I-405, I-110 or SR-91 Freeway Corridor. For purposes of this provision, the term "Alameda Corridor" means that portion of Alameda Street between Del Amo Boulevard and Lomita Boulevard. For purposes of this Section, the term "I-405 Freeway Corridor" means that portion of the I-405 Freeway that is on the north side of the I-405 Freeway and that is also between Main Street and Figueroa Street ("Main Street Portion") and that portion of the I-405 Freeway that is between the west line of Alameda Street and a point that is two thousand one hundred (2,100) feet west of the west line of Alameda Street ("Alameda Street Portion"). The term "I-110 Freeway Corridor" means that portion of the I-110 Freeway that directly abuts the east side of the I-110 Freeway, is zoned Manufacturing Light (ML), and is located on MTA owned property between Sepulveda Boulevard and Lomita Boulevard. The term "SR-91 Freeway Corridor" means that portion of the SR-91 Freeway that directly abuts the north side of the SR-91 Freeway, is zoned Manufacturing Light (ML), and is located on APN 7319-033-064 property between Avalon Boulevard and Central Avenue.	**Consistent.** Refer to Response to Municipal Code Section 9146.7 A (1).

Table 4.1-1, continued

Relevant Section	Consistency Analysis
9146.7 A (4): The I-405, I-110 and SR-91 Freeway Corridor static outdoor advertising signs shall not be erected within five hundred (500) feet of any other outdoor advertising sign on the same side of the freeway and a digital display shall not be erected within one thousand (1,000) feet of any other digital display on the same side of either freeway, but in no case shall there be more than two (2) digital display faces allowed on the north side of the I-405 Freeway Corridor within the entire Alameda Street Portion, no more than two (2) digital display faces allowed on the south side of the I-405 Freeway Corridor within the entire Alameda Street Portion, no more than two (2) digital display faces allowed on the I-110 Freeway Corridor, and no more than two (2) digital display faces allowed on the SR-91 Freeway Corridor. Other than an I-405, I-110 or SR-91 Freeway Corridor sign structure which shall not have a sign face area of more than six hundred seventy-two (672) square feet with the exception of no more than one hundred twenty-eight (128) square feet in extensions, no new sign structure having a total sign face area of more than eighty (80) square feet but not exceeding one hundred fifty (150) square feet shall be erected within: (a) Two hundred (200) feet of an outdoor advertising sign structure having a total sign face area greater than eighty (80) square feet; or (b) One hundred (100) feet of any other outdoor advertising sign structure located on the same side of the public street or other right-of-way.	**Consistent.** The converted double-sided digital sign would be located approximately 1,130 feet from an existing three-sided digital sign located to the northeast of the project site. The new double-sided digital sign would be located approximately 1,700 feet southeast of the converted double-sided digital sign and approximately 2,800 feet southeast from the existing three-sided digital sign. As a result, project implementation would not result in the construction of digital displays within 1,000 feet of any other digital display on the same side of the freeway. The project would not conflict with Municipal Code Section 9146.7 A (4) in this regard.
9146.7 A (5): No new sign structures having a total sign face area of eighty (80) square feet or less shall be erected within one hundred (100) feet of any outdoor advertising sign structure located on the same side of the public street or other right-of-way.	**Not Applicable.** The displays for the new double-sided digital sign structures would be 14 feet high by 48 feet wide for a total digital display area of 672 square feet per sign face. Thus, Municipal Code Section 9146.7 A (5) would not be applicable.
9146.7 A (6): Other than an I-405, I-110, or SR-91 Freeway Corridor sign structure, any such sign having a sign face visible from and within a distance of six hundred (600) feet of the edge of the right-of-way of a freeway or scenic highway measured horizontally along a line perpendicular to the centerline of such freeway or scenic highway shall not be permitted if placed or directed so as to be viewed primarily by persons traveling thereon.	**Not Applicable.** With approval of the project's proposed Zone Text Amendment, the proposed project would be located within the I-405 Freeway Corridor. Thus, Municipal Code Section 9146.7 A (6) would not be applicable.
9146.7 A (7): Such sign shall not be permitted on the roof of a building, and a freestanding sign shall not be permitted to project over the roof of a building.	**Consistent.** The new double-sided digital sign structures would be installed on vertical column supporting structures and would not project over the roof of a building. The project would not conflict with Municipal Code Section 9146.7 A (7) in this regard.
9146.7 A (8): Such signs shall not encroach over public rights-of-way.	**Consistent.** The project would be subject to Caltrans approval of an Outdoor Advertising (ODA) Display Permit, which would ensure the project meets several location and design features, including ensuring that the digital sign structures must be located outside the right-of-way of any

Table 4.1-1, continued

Relevant Section	Consistency Analysis
	highway. The project would not conflict with Municipal Code Section 9146.7 A (8) in this regard.
9146.7 A (9): Any such sign structure shall not be permitted within two hundred (200) feet of a residential zone located on the same side of a public street or right-of-way.	**Consistent.** The project site is not located within 200 feet of a residential zone. The nearest residential uses are located approximately 1,800 feet to the east of the project site. The project would not conflict with Municipal Code Section 9146.7 A (9) in this regard.
9146.7 A (10): Other than an I-405, I-110 or SR-91 Freeway Corridor sign structure or any pre-Ordinance No. 01-1237 sign structure, any such sign structure shall be designed in the simplest form and shall be free of any bracing, angle iron, guy wires, cables, etc.	**Not Applicable.** With approval of the project's proposed Zone Text Amendment, the proposed project would be located within the I-405 Freeway Corridor. Thus, Municipal Code Section 9146.7 A (10) would not be applicable.
9146.7 A (11): All exposed backs of such signs, which are visible to the public, shall be suitably covered in order to conceal the structure and shall be properly maintained.	**Consistent.** The supporting structure would hold both digital displays oriented in a "V" shape so as to simultaneously face traffic traveling along the northbound and southbound lanes of I-405; refer to Exhibit 2-4 and Exhibit 2-5. As a result, the proposed digital sign structures would not have exposed backs which are visible to the public. The project would not conflict with Municipal Code Section 9146.7 A (11) in this regard.
9146.7 A (12): An approved development agreement shall be required for each new sign structure. The provisions of this subsection shall govern the processing of applications for a development agreement for an outdoor advertising sign. Unless an extension is agreed to in writing by the applicant, the City Council shall render its decision on an application for a development agreement for an outdoor advertising sign within three (3) months of the date of acceptance of the application. An application for a development agreement for an outdoor advertising sign shall be approved by the City Council if the proposed sign structure conforms to the requirements of this code and applicable laws.	**Consistent.** As incorporated in Section 2.6, *Agreements, Permits, and Approvals*, the Development Agreement for the two proposed double-sided digital sign structures would provide assurance to the project Applicant that the project would proceed subject to the rules and regulations in effect at the time of project approval and provide assurance to the City that the project Applicant would construct the project as proposed. The project would not conflict with Municipal Code Section 9146.7 A (12) in this regard.
Source: City of Carson, *Carson Municipal Code*, current through Ordinance No. 19-1936, passed September 3, 2019.	

Northeastern view of the project site and Existing Sign Numbers 3068 and 3069 from northbound Interstate 405 (I-405).

Northwestern perspective of South Main Street, the I-405 Freeway Overpass, and existing off-site digital billboards.

Northern view of Existing Sign Number 3067 and Sign Numbers 3065 and 3066.

Northwestern view of the I-405 freeway and the Porsche Experience Center.

Southeastern view of the I-405 freeway and Existing Sign Numbers 3070 and 3071.

Northeastern view of the Dominguez Channel and Goodyear Airbase Blimp.

NOT TO SCALE

Michael Baker INTERNATIONAL

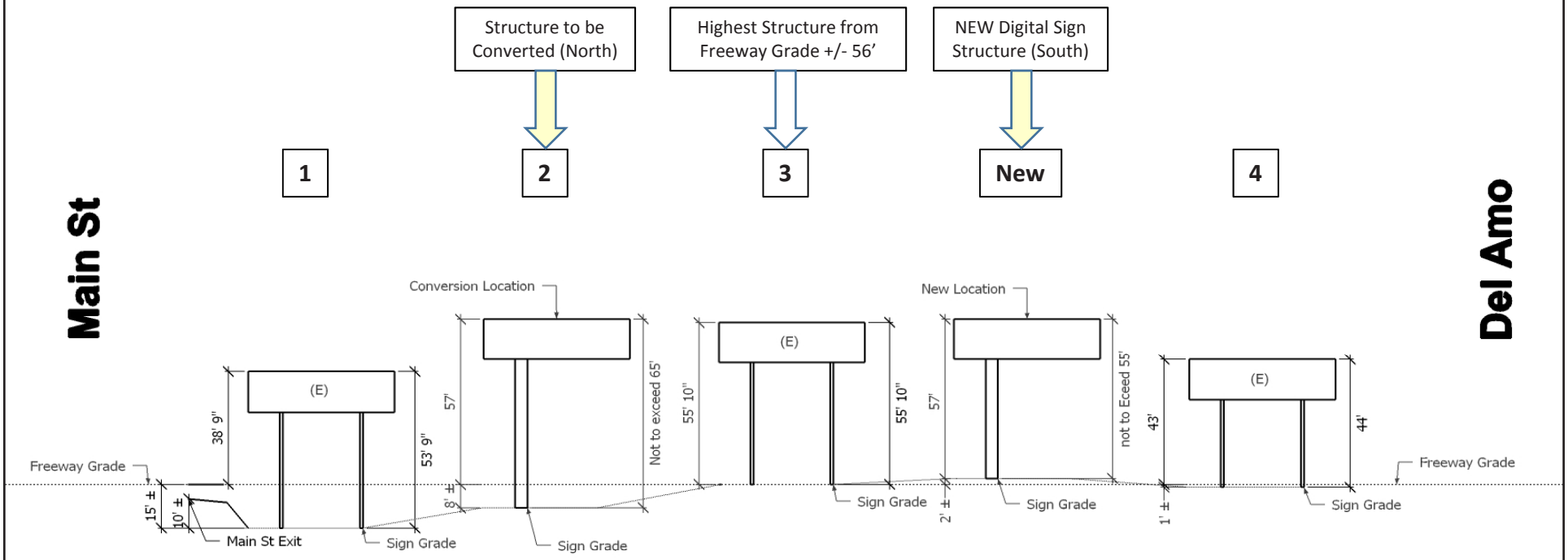
11/19 | JN 175487

19500 MAIN STREET DIGITAL BILLBOARDS PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Existing Conditions Photographs

Exhibit 4.1-1

Height of Existing & Proposed Sign Structures



NOT TO SCALE

Michael Baker INTERNATIONAL

11/19 I JN 175487

19500 MAIN STREET DIGITAL BILLBOARDS PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Existing and Proposed Sign Structure Elevations

Exhibit 4.1-2

As indicated in Table 4.1-1, the proposed project would be consistent with applicable Municipal Code requirements for outdoor advertising signs. Further, the project would be subject to special site plan and design review as required by the City's Design Overlay Review process. This regulatory procedure would verify that the proposed design of the digital sign structures is compatible with development in the surrounding vicinity. As a result, implementation of the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. A potentially significant impact would occur if a new source of substantial light or glare causes an adverse effect on day or nighttime views. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprising highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions.

CONSTRUCTION

The project would be required to comply with the Municipal Code Section 4104(i) and 4101(j) for allowable construction hours, which are limited to between 7:00 a.m. and 6:00 p.m. on weekdays and Saturdays. Construction is not allowed on Sundays and City holidays. Thus, as no construction activities would be permitted after 6:00 p.m., no short-term construction-related lighting impacts would result.

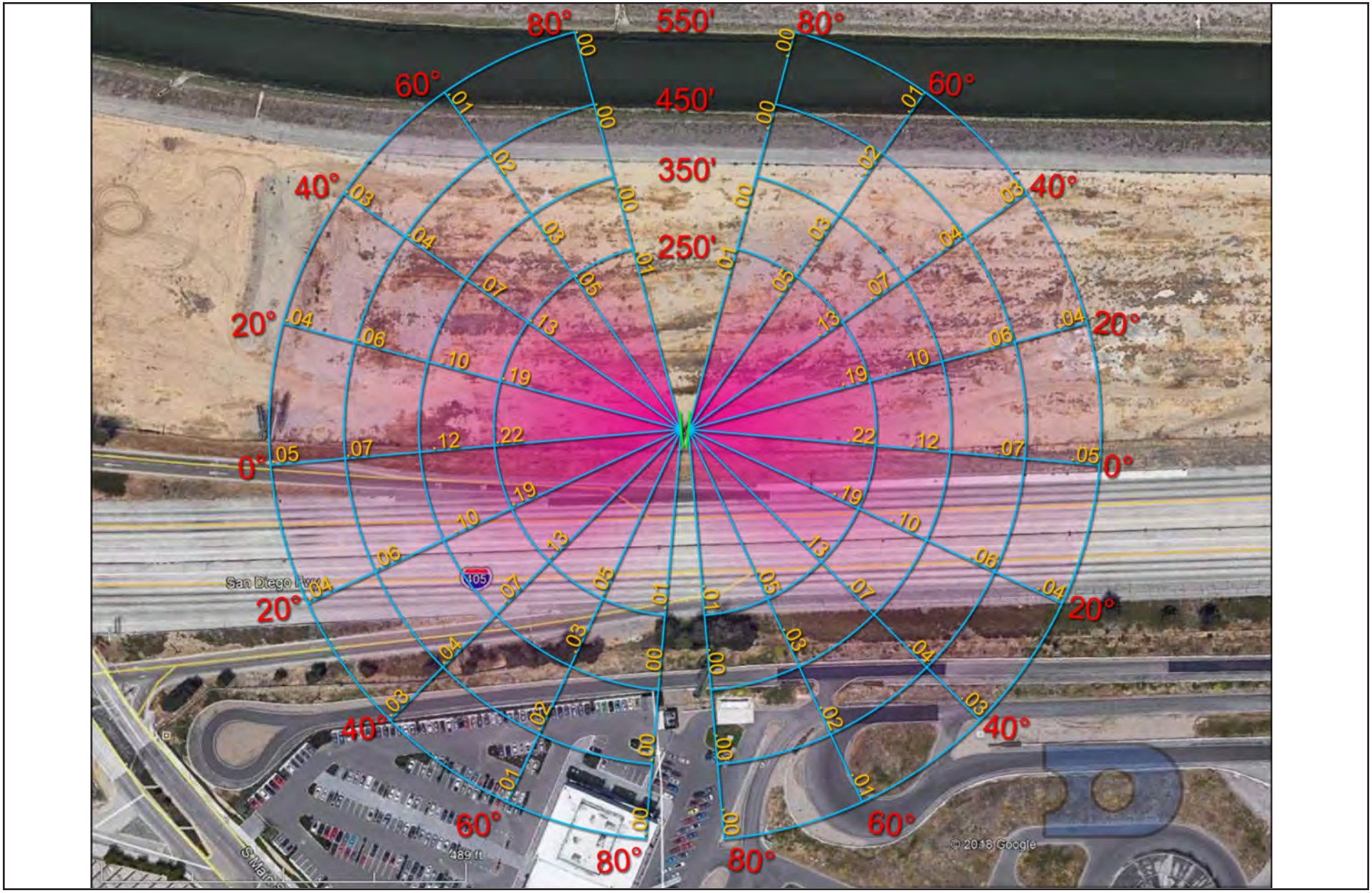
OPERATIONS

The project site is surrounded on all sides by urbanized uses with the exception of open space uses to the east. The only existing lighting sources within the project boundaries include display area lighting associated with the three existing double-sided static/traditional sign structures and single static/traditional sign structure. Vehicles travelling along I-405 also contribute to ambient lighting. As a result, the proposed digital sign structures would increase lighting at the project site compared to existing conditions.

Photometric plans were prepared for each of the proposed digital sign structures to determine the ground illuminance levels that would occur around the proposed digital sign structures; refer to Exhibit 4.1-3, *Photometric Plan – Sign Conversion Location*, and Exhibit 4.1-4, *Photometric Plan – New Sign Location*. Light trespass impacts are considered potentially significant if illuminance produced by the digital sign structures exceeds 0.3-foot candles over ambient levels at 250 feet from the lighting source, as recommended by the Outdoor Advertising Association of America. A foot candle is the unit for measuring the light present on a surface or workplane. One-foot candle is roughly equal to the uniform distribution of light from an ordinary wax candle on a one-square foot surface, located one foot away from the flame.

Based on the project's photometric plans, lighting levels on the digital billboards would not exceed 0.3-foot candles over ambient levels at 250 feet from the lighting source. No significant impacts would result in this regard. Further, there are no light-sensitive uses surrounding the project site which would be impacted by the proposed digital sign structures (i.e., residences, hospitals, hotels, etc.). Each digital sign would be equipped with light sensors to measure ambient light and would be adjusted as needed to ensure lighting levels do not exceed established standards. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.



Source: Daktronics, November 12, 2019.

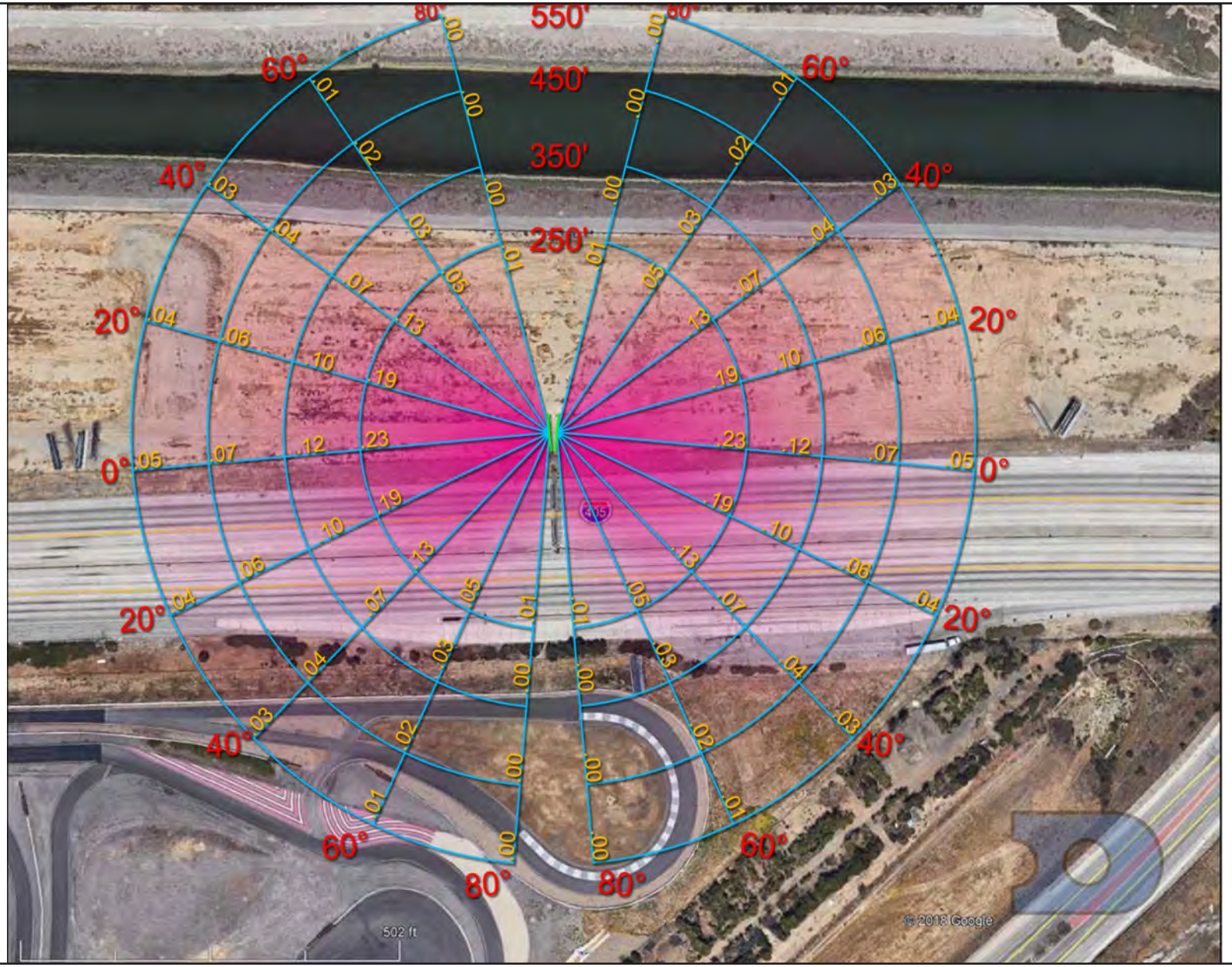
19500 MAIN STREET DIGITAL BILLBOARDS PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Photometric Plan – Sign Conversion Location

Michael Baker INTERNATIONAL

11/19 | JN 175487

Exhibit 4.1-3



Source: Daktronics, November 12, 2019.

19500 MAIN STREET DIGITAL BILLBOARDS PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Photometric Plan – New Sign Location

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11/19 | JN 175487

Exhibit 4.1-4

4.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				✓

a) 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. The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[1] No Farmland exists within the site vicinity. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

1 California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed November 4, 2019.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is zoned Commercial, Regional with a Design and Organic Refuse Landfill Overlay (CR-D-ORL), and is not covered under an existing Williamson Act contract.[2] Thus, project implementation would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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))?

No Impact. The project site is zoned CR-D-ORL and is not occupied or used by forest land or timberland. Further, project implementation would not result in the rezoning of forest land, timberland, or timberland zoned Timberland Production. No impacts would occur.

Mitigation Measures: No mitigation is required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Refer to Response 4.2(c). No impacts would occur.

Mitigation Measures: No mitigation is required.

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?

No Impact. Refer to Response 4.2(a) through 4.2(d). No impacts would occur.

Mitigation Measures: No mitigation is required.

2 California Department of Conservation, *Los Angeles County Williamson Act FY 2015/2016 Map*, updated 2016.

4.3 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:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Conflict with or obstruct implementation of the applicable air quality plan?			✓	
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?			✓	

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The project is located within the South Coast Air Basin (Basin), which is governed by the South Coast Air Quality Management District (SCAQMD). Project consistency with the SCAQMD's *2016 Air Quality Management Plan for the South Coast Air Basin* (2016 AQMP) is achieved when the project is found to be consistent with the goals, objectives, and assumptions set forth in the 2016 AQMP, which are designed to achieve Federal and State air quality standards. According to the SCAQMD's *1993 CEQA Air Quality Handbook*, in order to determine consistency with the 2016 AQMP, two main criteria must be addressed:

CRITERION 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

a) Would the project result in an increase in the frequency or severity of existing air quality violations?

Since the consistency criteria identified under the first criterion pertains to pollutant concentrations, rather than to total regional emissions, an analysis of the project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating project consistency. As discussed in Response 4.3(c), localized concentrations of carbon monoxide (CO), nitrogen oxides (NO_X), particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) would be less than significant during project construction and operations. Therefore, the proposed project would not result in an increase in the frequency or severity of existing air quality violations.[1]

1 Because reactive organic gases (ROGs) are not a criteria pollutant, there is no ambient standard or localized threshold for ROGs. Due to the role ROG plays in ozone formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

b) *Would the project cause or contribute to new air quality violations?*

As discussed in Response 4.3(b), the proposed project would result in emissions that are below the SCAQMD thresholds. Therefore, the project would not have the potential to cause or contribute to new air quality violations.

c) *Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?*

The proposed project would result in less than significant impacts with regard to localized concentrations during project construction and operations; refer to Response 4.3(c). As such, the project would not delay the timely attainment of air quality standards or 2016 AQMP emissions reductions.

CRITERION 2:

With respect to the second criterion for determining consistency with SCAQMD and Southern California Association of Governments (SCAG) air quality policies, it is important to recognize that air quality planning within the Basin focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the proposed project exceeds the assumptions utilized in preparing the forecasts presented in the 2016 AQMP. Determining whether or not a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

a) *Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?*

In the case of the 2016 AQMP, three sources of data form the basis for the projections of air pollutant emissions: the *Carson General Plan* (General Plan), SCAG's *Growth Management Chapter of the Regional Comprehensive Plan* (RCP), and SCAG's *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS). The RTP/SCS also provides socioeconomic forecast projections of regional population growth.

The project site is designated Regional Commercial (RC) by the General Plan and is zoned Commercial, Regional with a Design and Organic Refuse Landfill Overlay (CR-D-ORL). Project implementation would not introduce any new residents, housing, or jobs in the City and region. Thus, the project would not conflict with population, housing, and employment growth projections in the 2016 AQMP, General Plan, RCP, and RTP/SCS.

b) *Would the project implement all feasible air quality mitigation measures?*

The proposed project would result in less than significant air quality impacts. Compliance with all feasible emission reduction measures identified by the SCAQMD would be required as identified in Responses 4.3(b) and 4.3(c). As such, the proposed project would achieve this 2016 AQMP consistency criterion.

c) *Would the project be consistent with the land use planning strategies set forth in the AQMP?*

The two proposed double-sided digital sign structures would be constructed on a vacant site that already has existing static, traditional billboards. The project would be consistent with the *City of Carson Zoning Code* upon approval of the requested Zone Text Amendment, Conditional Use Permit, and Variance. The project would not conflict with land use planning strategies set forth in the 2016 AQMP. As such, the proposed project would achieve this 2016 AQMP consistency criterion.

In conclusion, the determination of project consistency with the 2016 AQMP is primarily concerned with the long-term influence of a project on Basin air quality. The two digital sign structures would not result in long-term impacts on the region's ability to meet State and Federal air quality standards. As discussed above, the proposed project would not conflict with the goals and policies of the 2016 AQMP, General Plan, RCP, and RTP/SCS. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact.

CRITERIA POLLUTANTS

Carbon Monoxide (CO). CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions. CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of carbon monoxide.

Ozone (O_3). O_3 occurs in two layers of the atmosphere. The layer surrounding the Earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (the "good" O_3 layer) extends upward from about ten to 30 miles and protects life on Earth from the sun's harmful ultraviolet rays. "Bad" O_3 is a photochemical pollutant, and needs volatile organic compounds (VOCs), nitrogen dioxide (NO_X), and sunlight to form; therefore, VOCs and NO_X are O_3 precursors. To reduce O_3 concentrations, it is necessary to control the emissions of these O_3 precursors. Significant O_3 formation generally requires an adequate amount of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High O_3 concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

While O_3 in the upper atmosphere (stratosphere) protects the Earth from harmful ultraviolet radiation, high concentrations of ground-level O_3 (in the troposphere) can adversely affect the human respiratory system and other tissues. O_3 is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors, children, and people with pre-existing lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible to the health effects of O_3. Short-term exposure (lasting for a few hours) to O_3 at elevated levels can result in aggravated respiratory diseases such as emphysema, bronchitis and asthma, shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, increased fatigue, as well as chest pain, dry throat, headache, and nausea.

Nitrogen Dioxide (NO_2). NO_X are a family of highly reactive gases that are a primary precursor to the formation of ground-level O_3 and react in the atmosphere to form acid rain. NO_2 (often used interchangeably with NO_X) is a reddish-brown gas that can cause breathing difficulties at elevated levels. Peak readings of NO_2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO_2 can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO_2 concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO_2 may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Coarse Particulate Matter (PM_{10}). PM_{10} refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter. PM_{10} arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. PM_{10} scatters light and significantly reduces visibility. In addition, these particulates penetrate into lungs and can potentially damage the respiratory tract. On June 19, 2003, the California Air Resources Board (CARB) adopted amendments to the Statewide 24-hour particulate matter standards based upon requirements set forth in the Children's Environmental Health Protection Act (Senate Bill 25).

Fine Particulate Matter ($PM_{2.5}$). Due to recent increased concerns over health impacts related to fine particulate matter (particulate matter 2.5 microns in diameter or less), both State and Federal $PM_{2.5}$ standards have been created. Particulate matter impacts primarily affect infants, children, the elderly, and those with pre-existing cardiopulmonary disease. In 1997, the U.S. Environmental Protection Agency (EPA) announced new $PM_{2.5}$ standards. Industry groups challenged the new standard in court and the implementation of the standard was blocked. However, upon appeal by the EPA, the United States Supreme Court reversed this decision and upheld the EPA's new standards. On January 5, 2005, the EPA published a Final Rule in the Federal Register that designates the Basin as a nonattainment area for Federal $PM_{2.5}$ standards. On June 20, 2002, CARB adopted amendments for Statewide annual ambient particulate matter air quality standards. These standards were revised and established due to increasing concerns by CARB that previous standards were inadequate, as almost everyone in California is exposed to levels at or above the current State standards during some parts of the year, and the Statewide potential for significant health impacts associated with particulate matter exposure was determined to be large and wide-ranging.

Sulfur Dioxide (SO_2). SO_2 is a colorless, irritating gas with a rotten egg smell; it is formed primarily by the combustion of sulfur-containing fossil fuels. Sulfur dioxide is often used interchangeably with SO_X and lead. Exposure of a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics.

Volatile Organic Compounds (VOC). VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O_3 to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are criteria pollutants since they are precursors to O_3, which is a criteria pollutant. The SCAQMD uses the terms VOC and ROG (see below) interchangeably.

Reactive Organic Gases (ROG). Similar to VOC, ROG are also precursors in forming O_3 and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO_x react in the presence of sunlight. ROGs are criteria pollutants since they are precursors to O_3, which is a criteria pollutant.

SHORT-TERM CONSTRUCTION EMISSIONS

The project involves construction activities associated with demolition, excavation, trenching, and construction. The project would be constructed over approximately four weeks. Construction activities would require approximately 40 cubic yards of soil to be exported from the project site to a nearby dump site during the grading phase; refer to Section 2.0, *Project Description*. Exhaust emission factors for typical diesel-powered heavy equipment are based on the California Emissions Estimator Model version 2016.3.2 (CalEEMod) program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. The analysis of daily construction emissions has been prepared utilizing CalEEMod. Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*, for the CalEEMod outputs and results. Table 4.3-1, *Construction Emissions*, presents the anticipated daily short-term construction emissions.

Table 4.3-1
Construction Emissions

Emissions Source	Pollutant (pounds/day)[1,2]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Emissions[2]	2.61	26.39	19.78	0.03	3.61	2.35
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes: ROG = reactive organic gases; NO_X = nitrous oxides; CO = carbon monoxide; SO_2 = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

1. Emissions were calculated using CalEEMod version 2016.3.2, as recommended by the SCAQMD.
2. The reduction/credits for construction emissions are based on "mitigation" included in CalEEMod and are required by the SCAQMD Rules. The "mitigation" applied in CalEEMod includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. The emissions results in this table represent the "mitigated" emissions shown in Appendix A.

Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*, for assumptions used in this analysis.

Fugitive Dust Emissions

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

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

The project would implement all required SCAQMD dust control techniques (i.e., daily watering), limitations on construction hours, and adhere to SCAQMD Rules 402 and 403 (which require watering of inactive and perimeter areas, track out requirements, etc.), to reduce PM_{10} and $PM_{2.5}$ concentrations. As depicted in Table 4.3-1, total PM_{10} and $PM_{2.5}$ emissions would not exceed SCAQMD thresholds during construction. Thus, construction air quality impacts would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, employee commutes to the project site, emissions produced on-site as the

equipment is used, and emissions from trucks transporting materials to/from the site. As presented in Table 4.3-1, construction equipment and worker vehicle exhaust emissions would not exceed the established SCAQMD threshold for all criteria pollutants. Therefore, impacts in this regard would be less than significant.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. In accordance with the methodology prescribed by the SCAQMD, the ROG emissions associated with paving and architectural coating have been quantified with the CalEEMod model. ROG emissions associated with the proposed project would be less than significant; refer to Table 4.3-1.

Naturally Occurring Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are human health hazards when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by State, Federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report* (August 2000), serpentinite and ultramafic rocks are not known to occur within the project area. Thus, there would be no impact in this regard.

LONG-TERM OPERATIONAL EMISSIONS

Project operational air pollution emissions would be minimal. The existing on-site sign structures require periodic vehicle trips for routine maintenance and these trips would continue to occur after implementation of the proposed project. As such, the project would not generate new operational vehicle trips. In addition, the project involves digital billboards that would not be a source of stationary air emissions. Thus, the project would not result in significant new operational impacts. Operational emissions associated with vehicle traffic and stationary sources would be less than significant.

AIR QUALITY HEALTH IMPACTS

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

As noted in the Brief of Amicus Curiae by the SCAQMD (dated April 6, 2015), the SCAQMD acknowledged it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons including

modeling limitations as well as where in the atmosphere air pollutants interact and form. Furthermore, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD) (dated April 13, 2015), SJVAPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

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

CUMULATIVE SHORT-TERM CONSTRUCTION IMPACTS

With respect to the proposed project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2016 AQMP pursuant to Federal Clean Air Act mandates. As such, the proposed project would comply with SCAQMD Rule 403 requirements and implement all feasible SCAQMD rules to reduce construction air emissions to the extent feasible. Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the proposed project. In addition, the proposed project would comply with adopted 2016 AQMP emissions control measures. Pursuant to SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects throughout the Basin, which would include related projects.

As discussed above, the project's short-term construction emissions would be below the SCAQMD thresholds and would result in a less than significant impact. Thus, it can be reasonably inferred that the project's construction emissions would not contribute to a cumulatively considerable air quality impact for nonattainment criteria pollutants in the Basin. A less than significant impact would occur in this regard.

CUMULATIVE LONG-TERM OPERATIONAL IMPACTS

As discussed, the proposed project would not result in long-term operational air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the proposed project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, no cumulative operational impacts associated with implementation of the proposed project would result.

Mitigation Measures: No mitigation is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children

under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

The nearest sensitive receptors to the project site are residences approximately 1,800 feet (549 meters) to the east of project site (situated east of the Dominguez Channel and The Links at Victoria Golf Course). In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing localized significance thresholds for construction and operations impacts (stationary sources only).

LOCALIZED SIGNIFICANCE THRESHOLDS

Localized Significance Thresholds (LSTs) were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST lookup tables for one-, two-, and five-acre projects emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD recommends that any project over five acres should perform air quality dispersion modeling to assess impacts to nearby sensitive receptors. The project is located within Source Receptor Area (SRA) 4, South Los Angeles County Coastal.

Construction LST

The SCAQMD guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day. The project would disturb less than an acre during the short grading/excavation phase. Therefore, to be conservative the LST thresholds for one acre were utilized for the construction LST analysis. The closest sensitive receptors are residential uses approximately 1,800 feet to the east of the project site. These sensitive land uses may be potentially affected by air pollutant emissions generated during on-site construction activities. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. As the nearest sensitive uses are approximately 1,800 feet (549 meters) to the east of project site, the LST values for 500 meters were used.

Table 4.3-2, *Localized Significance of Emissions*, shows the localized unmitigated and mitigated construction-related emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ compared to the LSTs for SRA 4. It is noted that the localized emissions presented in Table 4.3-2 are less than those in Table 4.3-1 because localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from hauling activities). As shown in Table 4.3-2, the project's localized construction emissions would not exceed the LSTs for SRA 4. Therefore, localized significance impacts from construction would be less than significant.

Table 4.3-2
Localized Significance of Emissions

Source	Pollutant (pounds/day)[3]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction (Grading/Excavation Phase)				
On-Site Emissions[1]	2.26	25.64	7.13	4.32
On-Site Emissions with SCAQMD Rules Applied[12]	2.26	25.64	3.45	2.30
Localized Significance Threshold[2]	113	7,558	158	93
Thresholds Exceeded?	***No***	***No***	***No***	***No***

Notes:

1. The grading/excavation phase emissions are presented as the worst-case scenario for NOx, CO, PM_{10}, and $PM_{2.5}$.
2. The reduction/credits for construction emissions applied in CalEEMod are based on the application of dust control techniques as required by SCAQMD Rule 403. The dust control techniques include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces twice daily; cover stock piles with tarps; water all haul roads three times daily; and limit speeds on unpaved roads to 15 miles per hour.
3. The Localized Significance Threshold was determined using Appendix C of the SCAQMD Final Localized Significant Threshold Methodology guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The Localized Significance Threshold was based on the anticipated daily acreage disturbance for construction (less than one acre; therefore the 1-acre threshold was used) and the source receptor area (SRA 4).

Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*, for assumptions used in this analysis.

Operational LST

According to SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). The proposed project does not include such uses. Thus, due to the lack of such emissions, no long-term localized significance threshold analysis is needed. As no stationary sources would result from the project, no operational LST impacts would result.

CARBON MONOXIDE HOTSPOTS

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The SCAQMD requires a quantified assessment of CO hotspots when a project increases the volume-to-capacity ratio (also called the intersection capacity utilization) by 0.02 (or two percent) for any intersection with an existing level of service LOS D or worse. Because traffic congestion is highest at intersections where vehicles queue and are subject to reduced speeds, these hot spots are typically produced at intersections.

The Basin is designated as an attainment/maintenance area for the Federal CO standards and an attainment area for State standards. There has been a decline in CO emissions even though vehicle miles traveled on the nation's urban and rural roads have increased. On-road mobile source CO emissions have declined 24 percent between 1989 and 1998, despite a 23 percent rise in motor vehicle miles traveled over the same 10 years. California trends have been consistent with national trends; CO emissions declined 20 percent in California from 1985 through 1997 while vehicle miles traveled increased 18 percent in the 1990s. Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

A detailed CO analysis was conducted in the *Federal Attainment Plan for Carbon Monoxide* (CO Plan) for the SCAQMD's *2003 Air Quality Management Plan*.[2] The locations selected for microscale modeling in the CO Plan are worst-case intersections in the Basin and would likely experience the highest CO concentrations. Thus, CO analysis within the CO Plan is utilized in a comparison to the proposed project, since it represents a worst-case scenario with heavy traffic volumes within the Basin.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the 35-ppm 1-hr CO Federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonably inferred that CO hotspots would not be experienced at any intersections within Carson near the project site. The existing on-site sign structures require periodic vehicle trips for routine maintenance and these trips would continue to occur after implementation of the proposed project. The project would not generate significant new vehicle trips and thus, no impacts would result.

AIR QUALITY HEALTH IMPACTS

As evaluated above, the project's air emissions would not exceed the SCAQMD's LST thresholds, and CO hotpots would not occur as a result of the proposed project. Therefore, the project would not exceed the most stringent applicable Federal or State ambient air quality standards for emissions of CO, NO_X, PM_{10}, or $PM_{2.5}$. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons (i.e., children and the elderly) are protected. In other words, the ambient air quality standards are purposefully set in a stringent manner to protect children, elderly, and those with existing respiratory problems. Thus, an air quality health impact would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project involves installing digital sign structures on the project site and does not include any uses identified by the SCAQMD as being associated with odors.

Construction activities associated with the project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon project completion. In addition, the project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce detectable odors from heavy-duty equipment exhaust. As such, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

2 The CO Plan was not updated as part of the 2016 AQMP.

4.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				✓
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				✓
c. Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			✓	
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

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

No Impact. According to the General Plan EIR, the City of Carson does not support any sensitive or special status species. Further, the project site is heavily disturbed and is located within an urbanized area of the City. Thus, project implementation would not adversely affect any candidate, sensitive, or special status species. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. According to the General Plan EIR, riparian habitat within the City of Carson is limited to the Carson Harbor Village Mobile Home Park located at the northwest portion of the City approximately one mile northeast of the project site. The project site is heavily disturbed and is located within an urbanized area of the City. Thus, project implementation would not adversely affect riparian habitat or other sensitive natural communities. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

No Impact. According to the General Plan EIR, wetland habitat within the City of Carson is limited to the 17-acre wetland within Harbor Village Mobile Home Park located at the northwest portion of the City approximately one mile northeast of the project site. As discussed, the project site is heavily disturbed and does not support State or Federally protected wetlands. Thus, project implementation would not adversely affect State or Federally protected wetlands. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. Project implementation does not require removal of any trees. Based on the lack of suitable habitat within the project site, project implementation would not interfere with the movement of any native resident, migratory fish or wildlife species. The project site is fenced and does not function as a wildlife corridor or nursery site. However, the existing static, traditional billboard has the potential to provide suitable nesting habitat for birds. The Migratory Bird Treaty Act (MBTA) governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, or nests. Mandatory compliance with the MBTA would reduce the project's potential construction-related impacts to migratory birds. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. According to the General Plan EIR, the City of Carson does not have any local policies or ordinances protecting biological resources or a tree preservation policy or ordinance. Further, the project does not require removal of any trees. Thus, project implementation would not conflict with any local policies or ordinances protecting biological resources. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

No Impact. According to the General Plan EIR, no areas within the City of Carson are located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Thus, project implementation would not conflict with the provisions of any such plans. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.5 CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?		✓		
c. Disturb any human remains, including those interred outside of formal cemeteries?			✓	

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

No Impact. According to the General Plan EIR, only two historic resources exist within the City: the initial United States Air Meet near 18501 South Wilmington Avenue and a Dominguez Rancho Adobe home located at 18127 Alameda Street (in Carson's Sphere of Influence). These historic resources are not located on or near the project site and would not be disturbed by project construction or operations. Further, the existing sign structures are not considered historical resources. Therefore, the project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines, and no impacts would occur.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact With Mitigation Incorporated. As detailed in the General Plan EIR, no archaeological sites or resources are known to exist within the City with the exception of the Suangna Village, which was located approximately three miles from the project site. As indicated in Section 2.0, *Project Description*, the project site was a former organic refuse landfill site (Ben K. Kazarian [BKK] Carson Dump) that operated between 1948 and 1959. According to the project's *Phase I Environmental Site Assessment* (Phase I ESA), cover soil ranges from three to five feet thick underlain by landfill material extending as deep as 22 feet below ground surface (bgs); refer to Appendix B, *Phase I ESA*. As the proposed project would have a maximum excavation depth of approximately 40 feet bgs, installation of the proposed digital sign structures would encounter native soils which have the potential to support buried archaeological resources. In the unlikely event that archaeological resources are encountered during project construction, Mitigation Measure CUL-1 would require all project construction efforts to halt until an archaeologist examines the site, identifies the archaeological significance of the find, and recommends a course of action. With implementation of Mitigation Measure CUL-1, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be reduced to less than significant levels.

Mitigation Measures:

CUL-1 Unanticipated Discovery of Cultural Resources. If cultural resources are encountered during project construction, work in the immediate area shall halt and a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, shall be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation and Native American consultation may be warranted to mitigate any significant impacts. Construction shall not resume until the qualified archaeologist states in writing that the proposed construction activities would not significantly damage archaeological resources.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. As noted in Response 4.5(b), the project site was formerly developed as an organic refuse landfill. Due to the level of disturbance on the project site and in the site vicinity, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or disturbance activities. Nonetheless, if human remains are found, those remains would require proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code Section 7050.5 through 7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by State law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County Coroner, notification of the Native American Heritage Commission and consultation with the individual identified by the Native American Heritage Commission to be the most likely descendant. If human remains are found during excavation, excavation must stop near the find and any area that is reasonably suspected to overlay adjacent remains until the County Coroner has been called out, the remains have been investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with the aforementioned regulations, impacts related to the disturbance of human remains are less than significant.

Mitigation Measures: No mitigation is required.

4.6 ENERGY

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

a) 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.

SENATE BILL 100

Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, 60 percent by December 31, 2030, and 100 percent by December 31, 2045. The bill requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), State board, and all other State agencies to incorporate that policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and State board to utilize programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the Legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of the policy.

CITY OF CARSON ENERGY EFFICIENCY CLIMATE ACTION PLAN

The *City of Carson 2015 Energy Efficiency Climate Action Plan* (EECAP) includes goals and policies to incorporate environmental responsibility into its daily management of its community and municipal operations. The EECAP includes a list of emission reduction actions organized by sector and a time frame for implementation. The EECAP classifies the reduction targets into two separate categories, community and municipal emissions. Energy efficiency strategies are outlined in the EECAP with goals and measures defined for each of the two categories.

PROJECT-RELATED SOURCES OF ENERGY CONSUMPTION

This analysis focuses on two sources of energy that are relevant to the proposed project: electricity and transportation fuel for vehicle trips associated with project construction. The analysis of operational electricity is based on the California Emissions Estimator Model version 2016.3.2 (CalEEMod) modeling results for the project. The project's estimated electricity consumption is based primarily on CalEEMod's default settings for Los Angeles County, and consumption factors provided by Southern California Edison (SCE) (the electricity providers for the City and the project site). The results of the CalEEMod modeling are included in Appendix A, *Air Quality/Greenhouse Gas/Energy Data*. The amount of operational fuel consumption was estimated using the California Air Resources Board (CARB) Emissions Factor 2017 (EMFAC2017) computer program which provides projections for typical daily fuel usage in Los

Angeles County. The estimated construction fuel consumption is based on the project's construction equipment list timing/phasing, and hours of duration for construction equipment.

The project's estimated energy consumption is summarized in Table 4.6-1, *Energy Consumption*. As shown in Table 4.6-1, the project's electricity usage would constitute an approximate 0.0002 percent increase over Los Angeles County's typical annual electricity. The project's construction vehicle fuel consumption would increase Los Angeles County's consumption by 0.0004 percent.

Table 4.6-1
Energy Consumption

Energy Type	Project Annual Energy Consumption[1]	Los Angeles County Annual Energy Consumption[2]	Percentage Increase Countywide[2]
Electricity Consumption[3]	160 MWh	67,569,000 MWh	0.0002
Construction (Heavy-Duty Diesel Vehicle) Fuel Consumption[4]	1,967 gallons	533,800,839 gallons	0.0004

Notes: MWh = megawatt hour

1. As modeled in CalEEMod version 2016.3.2.
2. The project increases in electricity are compared to the total consumption in Los Angeles County in 2018 (the most recent year available). The project increases in automotive fuel consumption are compared with the projected Countywide fuel consumption in 2020 (the project's estimated construction year). Los Angeles County electricity consumption data source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed November 21, 2019.
3. Per the Applicant, each billboard face would consume roughly 40,000 kilowatt hours (kWh) per year. The project would include two double-faced digital billboards; thus, the project's energy usage would equal 4 x 40,000 kWh/year (or 160,000 kWh/year).
4. Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board EMFAC2017 model.

Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*, for assumptions used in this analysis.

Construction Energy Consumption

Heavy-duty diesel vehicle fuel used for construction vehicles and other energy-consuming equipment would be used during demolition, excavation, trenching, and construction. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest U.S. Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, and manufactured or processed materials would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials (e.g., concrete and steel) would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. As indicated in Table 4.6-1, the project's fuel consumption from construction

would be approximately 1,967 gallons, which would increase fuel use in the County by 0.0004 percent. As such, construction would have a nominal effect on the local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project characteristics that would necessitate the use of construction equipment less energy efficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption would not be inefficient, wasteful, or unnecessary. A less than significant impact would occur in this regard.

Operational Energy Consumption

Transportation Energy Demand

The existing sign structures on the project site currently require periodic vehicle trips for routine maintenance and these vehicle trips would continue to occur after implementation of the proposed project. Fuel consumption associated with the project would not change from baseline conditions, as the project would not generate new operational trips, and would not be considered inefficient, wasteful, or unnecessary. As such, a less than significant impact would occur in this regard.

Electricity Demand

The proposed double-sided digital sign structures would require electricity to power the digital displays. The electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 percent of total procurement by 2030. Additionally, per SB 100, SCE would be required to increase procurement from eligible renewable energy to 52 percent by December 31, 2027, 60 percent by December 31, 2030, and 100 percent by December 31, 2045. As indicated in Table 4.6-1, operational energy consumption would represent an approximate 0.0002 percent increase in electricity consumption over the current County-wide usage. The project would adhere to all Federal, State, and local requirements for energy efficiency, and would rely on energy provided by SCE, which would adhere to the RPS and SB 100. Additionally, the project would not result in a substantial increase in demand or transmission service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure. The project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The EECAP contains community and municipal energy efficient goals and measures that would help reduce GHG emissions within the City. EECAP Table 5, *Community GHG Reduction Strategies*, details goals and measures specific to existing and new residential and commercial developments, and EECAP Table 6, *Municipal GHG Reduction Strategies*, includes goals and measures specific to municipal operations (e.g., municipal buildings and City infrastructure). As the project does not involve development of any residential, commercial, or municipal uses, the EECAP goals and measures would not apply. Furthermore, the project would rely on energy provided by SCE, which would adhere to RPS and SB 100 requirements. Therefore, the proposed project would result in less than significant impacts associated with renewable energy or energy efficiency plans.

Mitigation Measures: No mitigation is required.

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4.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) 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.				✓
2) Strong seismic ground shaking?			✓	
3) Seismic-related ground failure, including liquefaction?			✓	
4) Landslides?				✓
b. Result in substantial soil erosion or the loss of topsoil?			✓	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and 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) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

1) 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.

No Impact. According to the General Plan EIR, the Newport-Inglewood Fault Hazard Zone is located in the northernmost portion of the City (approximately two miles northeast of the project site) and has been mapped in accordance with the Alquist-Priolo Earthquake Fault Zoning Act. As mapped by the California Geologic Survey, the

project site is not located within the Alquist-Priolo earthquake fault zone for the Newport-Inglewood Fault.[1] As such, no impact regarding rupture of a known earthquake fault would occur.

Mitigation Measures: No mitigation is required.

2) Strong seismic ground shaking?

Less Than Significant Impact. The project area, like the rest of southern California, is situated within a seismically active region as the result of being located near the active margin between the North American and Pacific tectonic plates. As stated above, the Newport-Inglewood Fault Hazard Zone is located in the northernmost portion of the City. Active and potentially active faults within the region could produce seismic shaking at the project site, and it is likely that the site would periodically experience ground shaking as a result of moderate to large magnitude earthquakes.

The project does not propose habitable structures. Additionally, in conformance with the General Plan and the existing seismic design requirements of the California Building Code (CBC) and Title 26, *Building Code*, of the Los Angeles County Code, as incorporated by reference in Municipal Code Section 8100, *Adoption of Building Code*, the project would be subject to seismic design standards to minimize the potential for damage and major injury during a seismic event. As such, impacts related to seismic ground shaking would be less than significant.

Mitigation Measures: No mitigation is required.

3) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction and seismically-induced settlement or ground failure is generally related to strong seismic shaking events where the groundwater occurs at shallow depth (generally within 50 feet of the ground surface) or where lands are underlain by loose, cohesionless deposits. Liquefaction typically results in the loss of shear strength of a soil, which occurs due to the increase of pore water pressure caused by the rearrangement of soil particles induced by shaking or vibration. During liquefaction, soil strata behave similarly to a heavy liquid. According to the California Geologic Survey, portions of the project site are located within areas designated as liquefaction zones.[2] However, the project does not propose any habitable structures and conformance with existing seismic design requirements pursuant to Municipal Code Section 8100, *Adoption of Building Code*, would ensure the proposed digital sign structures are constructed in a manner that would reduce hazards associated with potential seismic-related ground failure, including liquefaction. Final plan design review would ensure all required seismic safety design standards are met. As such, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

4) Landslides?

No Impact. The project site is generally flat with minimal elevation change. Further, according to the General Plan EIR, there are no areas known to exist within the City where previous occurrence of landslide movement has occurred. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact.

1 California Geologic Survey, *Earthquake Zones of Required Investigation, Torrance Quadrangle*, March 25, 1999.
2 Ibid.

CONSTRUCTION

The site is currently vacant and contains minimal vegetation. Project construction would not disturb more than one acre of soil. Thus, the project would not be required to obtain coverage under the State Water Resources Control Board's *General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ* (General Construction Permit). However, project construction would be required to comply with the City's Storm Water Management and Discharge Control Ordinance (Municipal Code Chapter 8, *Storm Water and Urban Runoff Pollution Control*) by limiting soil erosion and runoff. Thus, impacts in this regard would be less than significant.

OPERATIONS

Operations of the digital sign structures would not result in substantial soil erosion or the loss of topsoil. No operational impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. Refer to Responses 4.7(a)(3), 4.7(a)(4), and 4.7(d) for a discussion concerning liquefaction, landslides, and collapse (from expansive soils).

LATERAL SPREADING

The General Plan EIR defines lateral spreading as limited displacement ground failure, often associated with liquefaction. Lateral spreading is typically exemplified by the formation of vertical cracks on the surface of liquefied soils, and usually takes place on gently sloping ground or level ground with nearby free surface such as a drainage or stream channel. Given that portions of the site are located within designated liquefaction zones and the site is adjacent to the Dominguez Channel, there is potential for lateral spreading to occur during a seismic event. However, as stated above, the project would be required to comply with existing seismic safety design standards pursuant to Municipal Code Section 8100. Impacts related to lateral spreading would be less than significant in this regard.

SUBSIDENCE

According to the General Plan EIR, subsidence has occurred within the City as a result of previous withdrawal of oil within the Wilmington Oil Field. However, the City has maintained control of subsidence within Carson. The Wilmington Oil Field is more than four miles from the project site in the City of Long Beach. Compliance with all required seismic safety design standards pursuant to Municipal Code Section 8100 would ensure impacts from potential unstable geologic units or soils, including landslide, lateral spreading, subsidence, liquefaction, and collapse, would be reduced to less than significant levels.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking (and potentially collapsing) when dry. Soil expansion can damage structures by cracking foundations, causing settlement and collapse, and distorting structural elements. In accordance with Municipal Code Section 8100, the project would be required to comply with geotechnical design

standards identified in the CBC to minimize the potential for risk of life or property as a result of expansive soils. Following conformance with the CBC and Municipal Code Section 8100, impacts related to expansive soils would be less than significant.

Mitigation Measures: No mitigation is required.

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?

No Impact. No septic tanks or alternative wastewater systems would be constructed as part of the project. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation Incorporated. According to the General Plan EIR, there are no known paleontological resources or unique geologic features within Carson. The project site is currently vacant land and was a former organic refuse landfill site that closed in 1959. According to the project's Phase I Environmental Site Assessment (Phase I ESA), cover soil at the project site ranges from three to five feet thick and is underlain by landfill material extending as deep as 22 feet below ground surface (bgs); refer to Appendix B, *Phase I ESA*. As the project would have a maximum excavation depth of approximately 40 feet bgs, installation of the proposed digital sign structures would encounter native soils which have the potential to support buried paleontological resources. In the unlikely event that paleontological resources are encountered during project construction, Mitigation Measure GEO-1 would require all revised project construction activities to halt until a paleontologist identifies the paleontological significance of the find and recommends a course of action. Thus, following implementation of Mitigation Measure GEO-1, impacts would be reduced to less than significant levels.

Mitigation Measures:

GEO-1 If evidence of subsurface paleontological resources is found during construction, excavation and other construction activity in that area shall cease and the construction contractor shall contact the City of Carson Community Development Director. With direction from the Community Development Director, a paleontologist certified by the County of Los Angeles shall evaluate the find prior to resuming grading in the immediate vicinity of the find. If warranted, the paleontologist shall prepare and complete a standard Paleontological Resources Mitigation Program for the salvage and curation of identified resources.

4.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact.

California is a substantial contributor of global greenhouse gases (GHGs), emitting over 440 million tons of carbon dioxide (CO_2) per year.[1] Climate studies indicate that California is likely to see an increase of three to four degrees Fahrenheit over the next century. Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect and increase the Earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission.

The impact of human activities on global climate change is apparent in observational records. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of CO_2, CH_4, and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750) to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million. For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 parts per million in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range.

REGULATORY FRAMEWORK

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 parts per million carbon dioxide equivalent (CO_2eq)[2] concentration is required to keep global warming below two degrees Celsius, which in turn is assumed to be necessary to avoid dangerous climate change.

1 California Environmental Protection Agency, *California Greenhouse Gas Emissions for 2000 to 2016*, https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2016/ghg_inventory_trends_00-16.pdf, accessed November 11, 2019.

2 Carbon Dioxide Equivalent (CO_2eq) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

State

Various Statewide and local initiatives to reduce the State's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is necessary to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

Assembly Bill 32 (California Global Warming Solutions Act of 2006). California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Executive Order S-3-05. Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

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

Senate Bill 32. Signed into law on September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030.

CARB Scoping Plan. On December 11, 2008, CARB adopted the *Climate Change Scoping Plan* (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. The Scoping Plan contains the main strategies California will implement to reduce CO_2eq emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions level of 596 million MT CO_2eq under a business as usual (BAU)[3] scenario. This is a reduction of 42 million MT CO_2eq, or almost ten percent, from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020.

The Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, commercial and residential, industrial, etc.). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. The measures described in the Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target

3 "Business as Usual" refers to emissions that would be expected to occur in the absence of GHG reductions; refer to http://www.arb.ca.gov/cc/inventory/data/bau.htm. Note that there is significant controversy as to what BAU means. In determining the GHG 2020 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

established by AB 32. The Scoping Plan update also looks beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observes that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal."

In December 2017, CARB approved the *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target*. This update focuses on implementation of a 40 percent reduction in GHGs by 2030 compared to 1990 levels. To achieve this, the updated 2017 Scoping Plan draws on a decade of successful programs that addresses the major sources of climate changing gases in every sector of the economy

Local

City of Carson Climate Action Plan

In December 2017, the City adopted the *City of Carson Climate Action Plan* (CAP). The CAP was created in partnership with the South Bay Cities Council of Governments and Southern California Edison (SCE) and was prepared to follow the guidance of California's *Long Term Energy Efficiency Strategic Plan*. The CAP identifies a comprehensive set of electricity-related energy efficiency targets, goals, policies, and actions to help the community and the City become more energy efficient. The CAP also provides policies and actions to assist with the implementation of energy efficiency strategies and summarizes the policies, benefits, implementation time frame, and responsible departments for implementing the components of each energy efficiency strategy. The CAP's energy reduction targets set the groundwork for any GHG reduction targets found in a future climate action plan; however, the City has not yet adopted a qualified GHG reduction plan under CEQA that would be applicable to the proposed project.

SIGNIFICANCE THRESHOLDS

The SCAQMD has formed a GHG CEQA Significance Threshold Working Group (Working Group) to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting No. 15) held in September 2010, the SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency.

With the tiered approach, the project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. For all non-industrial projects, the SCAQMD is proposing a screening threshold of 3,000 $MTCO_2eq$ per year. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, the project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. Under the Tier 4 second option, the project would be excluded if it had early compliance with AB 32 through early implementation of CARB's Scoping Plan measures. Under the Tier 4 third option, the project would be excluded if it was below an efficiency-based threshold of 4.8 $MTCO_2eq$ per service population (SP) per year.[4] Tier 5 would exclude projects that implement off-site mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

4 The project-level efficiency-based threshold of 4.8 $MTCO_2eq$ per SP per year is relative to the 2020 target date. The SCAQMD has also proposed efficiency-based thresholds relative to the 2035 target date to be consistent with the GHG reduction target date of SB 375. GHG reductions by the SB 375 target date of 2035 would be approximately 40 percent. Applying this 40 percent reduction to the 2020 targets results in an efficiency threshold for plans of 4.1 $MTCO_2eq$ per SP per year and an efficiency threshold at the project level of 3.0 $MTCO_2eq$/year.

GHG efficiency metrics are utilized as thresholds to assess the GHG efficiency of a project on a per capita basis or on a "service population" basis (the sum of the number of jobs and the number of residents provided by a project) such that the project would allow for consistency with the goals of AB 32 (i.e., 1990 GHG emissions levels by 2020 and 2035). GHG efficiency thresholds can be determined by dividing the GHG emissions inventory goal of the State, by the estimated 2035 population and employment. This method allows highly efficient projects with higher mass emissions to meet the overall reduction goals of AB 32, and is appropriate, because the threshold can be applied evenly to all project types (residential or commercial/retail only and mixed-use).

The 3,000 $MTCO_2eq$ per year threshold has been selected as the significance threshold, as it is most applicable to the proposed project. The 3,000 $MTCO_2eq$ per year threshold is used in addition to the qualitative thresholds of significance set forth below from section VII of Appendix G to the CEQA Guidelines.

PROJECT-RELATED SOURCES OF GREENHOUSE GASES

Project-related GHG emissions would include emissions from direct and indirect sources. The proposed project would result in direct and indirect emissions of CO_2, N_2O, and CH_4, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, while indirect sources include emissions from electricity consumption. The proposed project would install a new double-sided digital sign structure and replace an existing static, traditional billboard on the project site with a double-sided digital sign structure. Thus, the project would not include any operational area source, mobile, water, or waste GHG emissions. Operational energy GHG estimations are based on electricity factors from SCE. The California Emissions Estimator Model version 2016.3.2 (CalEEMod) was utilized to calculate the project's construction GHG emissions. Table 4.8-1, *Estimated Greenhouse Gas Emissions*, presents the estimated CO_2, CH_4, and N_2O emissions of the proposed project. The CalEEMod outputs are contained within the Appendix A, *Air Quality/Greenhouse Gas /Energy Data*.

Table 4.8-1
Estimated Greenhouse Gas Emissions

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO_2eq[2,3]
	Metric Tons/yr[1]	Metric Tons/yr[1]	Metric Tons of CO_2eq[1]	Metric Tons/yr[1]	Metric Tons of CO_2eq[1]	
Direct Emissions						
Construction (amortized over 30 years)	0.79	0.00	0.01	0.00	0.00	0.80
Indirect Emissions						
Energy	37.23	0.00	0.04	0.00	0.14	37.41
Total Project-Related Emissions[2]	***38.21 $MTCO_2eq/yr$***					
SCAQMD GHG Threshold	***3,000 $MTCO_2eq/yr$***					
Project Exceed SCAQMD GHG Threshold?	***No***					

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxides, $MTCO_2eq/yr$ = metric tons of carbon dioxide equivalent per year

1. Emissions were calculated using CalEEMod version 2016.3.2, as recommended by the SCAQMD.
2. Totals may be slightly off due to rounding.
3. Carbon dioxide equivalent values calculated using the United States Environmental Protection Agency Website, *Greenhouse Gas Equivalencies Calculator*, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed November 11, 2019.

Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*, for detailed model input/output data.

Direct Project-Related Sources of Greenhouse Gases

Construction Emissions. Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions.[5] As seen in Table 4.8-1, the proposed project would result in 0.80 $MTCO_2eq$ when amortized over 30 years.

Indirect Project-Related Sources of Greenhouse Gases

Energy Consumption. Energy Consumption emissions were calculated using emission factors (lb/MWh) from the SCE *2018 Sustainability Report* and CalEEMod; refer to Appendix A. The project would indirectly result in 37.41 $MTCO_2eq$/year due to energy consumption; refer to Table 4.8-1.

Total Project-Related Sources of Greenhouse Gases

As shown in Table 4.8-1, the total amount of proposed project-related GHG emissions from direct and indirect sources combined would total 38.21 $MTCO_2eq$/yr.

CONCLUSION

As shown in Table 4.8-1, the total amount of proposed project-related GHG emissions from direct and indirect sources combined would total 38.21 $MTCO_2eq$/yr, which is well below the SCAQMD GHG threshold of 3,000 $MTCO_2eq$/yr. Thus, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. As detailed in Section 4.6, *Energy*, the *City of Carson 2015 Energy Efficiency Climate Action Plan* (EECAP) includes goals and policies to incorporate environmental responsibility into its daily management of its community and municipal operations. The EECAP includes a list of energy efficiency goals and measures that would help reduce Citywide GHG emissions. As the EECAP goals and measures do not apply to the proposed digital sign structures, the project would not conflict with the EECAP and the City's efforts in reducing GHG emissions.

The project would also be consistent with the 2017 Scoping Plan measures listed in Table 4.8-2, *Project Consistency with 2017 Scoping Plan*, and would be subject to future applicable Federal, State, and local regulatory requirements for GHG emissions. Further, as shown in Table 4.8-1, the project would not exceed the SCAQMD GHG screening threshold of 3,000 $MTCO_2eq$/yr.

Overall, the project would not conflict with or impede implementation of reduction goals identified in the CAP, EECAP, 2017 Scoping Plan, and other Federal, State, and Regional strategies to help reduce GHG emissions. As such, the project would not conflict with an applicable GHG reduction plan, policy, or regulation. Impacts would be less than significant in this regard.

5 The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, October 2008).

Table 4.8-2
Project Consistency with 2017 Scoping Plan

Actions and Strategies	Project Consistency Analysis
SB 350	
Achieve a 50 percent Renewables Portfolio Standard (RPS) by 2030, with a doubling of energy efficiency savings by 2030.	The project would not be an electrical provider or would delay the goals of SB 350. Furthermore, the project would utilize electricity from SCE which would be required to comply with SB 350. As the project would use the electricity from SCE, the project would be in compliance with SB 350.
Low Carbon Fuel Standard (LCFS)	
Increase stringency of carbon fuel standards; reduce the carbon intensity of fuels by 18 percent by 2030, which is up from 10 percent in 2020.	The project would not result in a substantial increase operational mobile vehicle trips compared to existing conditions. Furthermore, all heavy-duty construction equipment would be required to follow the LCFS. Thus, the project would not conflict with the LCFS.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario)	
Maintain existing GHG standards of light and heavy-duty vehicles while adding an addition 4.2 million zero-emission vehicles (ZEVs) on the road. Increase the number of ZEV buses, delivery trucks, or other trucks.	Project operations would not include any light or heavy-duty truck trips. As such, the project would not conflict with the goals of the Mobile Source Strategy.
Sustainable Freight Action Plan	
Improve the freight system efficiency and maximize the use of near zero emission vehicles and equipment powered by renewable energy. Deploy over 100,000 zero-emission trucks and equipment by 2030.	The project would not include any freight systems. Therefore, the project would not conflict with the Sustainable Freight Action Plan.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy	
Reduce the GHG emissions of methane and hydrofluorocarbons by 40 percent below the 2013 levels by 2030. Furthermore, reduce the emissions of black carbon by 50 percent below the 2013 levels by the year 2030.	The project would not include sources that would emit large amounts of methane; refer to Table 4.8-1. Furthermore, the project would comply with all CARB and SCAQMD hydrofluorocarbon regulations. As such, the project would not conflict with the SLCP reduction strategy.
SB 375 Sustainable Communities Strategies	
Increase the stringency of the 2035 GHG emission per capita reduction target for metropolitan planning organizations (MPO).	The project does not involve development of any residential, commercial, or municipal uses. As such, the project would not impede the 2035 GHG emission per capital reduction target goals of SB 375.
Post-2020 Cap-and-Trade Programs	
The Cap-and-Trade Program will reduce greenhouse gas (GHG) emissions from major sources (covered entities) by setting a firm cap on statewide GHG emissions while employing market mechanisms to cost-effectively achieve the emission-reduction goals.	The project would not be a gross emitter of CO_2eq emissions (25,000 metric tons per year), and thus would be exempt from the Cap-and-Trade program. The project would not conflict with this goal in this regard.
Source: California Air Resources Board, *2017 Scoping Plan*, November 2017.	

Mitigation Measures: No mitigation is required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		✓		
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		✓		
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard 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?				✓

This section is primarily based upon the *Phase I Environmental Site Assessment 19500 Main Street Digital Billboards Project* (Phase I ESA), prepared by Ninyo & Moore Geotechnical and Environmental Sciences Consultants (Ninyo and Moore), dated November 22, 2019; refer to Appendix B, *Phase I Environmental Site Assessment*. The intent of the Phase I ESA is to evaluate recognized environmental conditions (RECs). The Phase I ESA included a search for recorded environmental cleanup liens; review of Federal, tribal, State, and local government records; visual inspection of the property and of adjoining properties; and interviews with the project's property owner representative regarding the environmental status of the project site.

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

Less Than Significant Impact. Exposure of the public or the environment to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a

transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

CONSTRUCTION

Based on the Phase I ESA, the project site, as well as the off-site properties associated with The Links at Victoria Golf Course, the Goodyear Blimp Base Airport, and the Porsche Experience Driving Center, were formerly developed with a Class II non-hazardous waste landfill between 1948 and 1959. The former landfill was permitted to accept inert solid fill (rock, concrete, soil), household and commercial refuse (paper, wood, rubber), garbage (animal and vegetable products), and liquids and semi-liquids (drilling muds and printer's ink). The former landfill was unlined, did not have a leachate collection system during its operation, and did not undergo formal closure. Information available on EnviroStor regarding previous environmental investigations on the site indicate that cover soil at the project site ranges from three to five feet thick underlain by landfill material extending as deep as 22 feet below ground surface (bgs). As the proposed project would have a maximum excavation depth of approximately 40 feet bgs, installation of the proposed digital sign structures would likely encounter landfill material, which would be required to be excavated and disposed of at an approved facility prior to installing appropriate foundation structures. Any transport of these materials would be required to comply with existing Federal, State, and local laws and regulations pertaining to transport and disposal. With compliance with existing laws and regulations, impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be reduced to less than significant levels.

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction materials (i.e., oil, diesel fuel, transmission fluid, etc.). However, these activities would be short-term, and the materials used would not be in such quantities, or stored in such a manner, as to pose a significant safety hazard. Impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be less than significant.

OPERATIONS

Project operations would not transport, use, or disposal of hazardous materials in reportable quantities. No impacts would result in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact With Mitigation Incorporated.

CONSTRUCTION

During project construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and Federal law. Impacts in this regard would be less than significant.

Historical Landfill Operations

Based on the Phase I ESA, the project site is located at a former Class II non-hazardous waste landfill. Based on the Phase I ESA's review of information available regarding previous environmental investigations on the site, the project site's former use as an organic refuse landfill site has resulted in contamination to the soil, soil gas, and groundwater. Proposed excavation activities could result in the disturbance of existing landfill materials and could expose construction workers to hazardous materials during site disturbance activities. Prior to any site disturbance activities, Mitigation Measure HAZ-1 would require preparation of a Geotechnical Investigation to confirm the presence/absence of landfill material and require appropriate measures regarding the removal, disposal, and appropriate backfill of clean soils, as necessary, per existing Federal and State laws and regulations. Further, Mitigation Measure HAZ-2 would require that the construction contractor is certified in the Occupational Safety and Health Administration's (OSHA's) 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training program for the purposes of handling potential contaminated media during construction. With implementation of Mitigation Measures HAZ-1 and HAZ-2, impacts would be reduced to less than significant levels.

Soil Stockpiles

Three soil stockpiles with unknown sources were observed on the site; refer to Figure 2 of Appendix B. According to the Phase I ESA, disturbance of these stockpiles would represent a REC. Project construction is not anticipated to disturb the three soil stockpiles on the project site. No impact would occur in this regard.

OPERATIONS

Project operations would not involve ground disturbance activities with the potential to release of hazardous materials into the environment. No impact would occur in this regard.

Mitigation Measures:

HAZ-1 Prior to ground disturbance activities, the project Applicant shall retain a qualified Geotechnical Specialist with Phase II/site characterization experience to provide a geotechnical investigation for the proposed foundations of the digital sign structures. The investigation shall determine the potential for the excavation activities to encounter landfill materials, include appropriate recommendations for removal and disposal, and include appropriate recommendations for backfill materials. The geotechnical investigation report shall be provided to the Department of Toxic Substances Control for review and comment, and to the City of Carson Engineer for approval prior to ground disturbance activities

HAZ-2 During construction activities, the contractor shall employ engineering controls and best management practices (BMPs) to minimize human exposure to potential contaminants and potential negative effects from an accidental release to groundwater and soils. Contractor employees working on-site shall be certified in Occupational Safety and Health Administration's (OSHA's) 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training program and shall implement any engineering controls and construction BMPs recommended by the Department of Toxic Substance Control (as part of Mitigation Measure HAZ-1). Any required engineering controls and construction BMPs shall be listed on the project plans and specifications, to be approved by the City of Carson Engineer. Examples may include, but not be limited to, the following:

- Contractor shall monitor the area around the construction site for fugitive vapor emissions with appropriate field screening instrumentation.
- Contractor shall water/mist soil as it is being excavated and loaded onto trucks.

- Contractor shall place any stockpiled soil in areas that are shielded from prevailing winds.
- Contractor shall cover the bottom of excavated areas with sheeting when work is not being performed.

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

No Impact. There are no existing or proposed schools within 0.25-mile of the project site. The nearest school (Towne Avenue Elementary School) is located over 0.5-mile northeast of the project site at 18924 Towne Avenue. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact With Mitigation Incorporated. Government Code Section 65962.5 requires the Department of Toxic Substances Control and State Water Resources Control Board to compile and update a regulatory sites list (pursuant to the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Health and Safety Code Section 116395. Government Code Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

As discussed in Response 4.9(b), the project site is listed pursuant to Government Code Section 65962.5 based on its former use as an organic refuse landfill site.[1] However, as discussed in Response 4.9(b), impacts would be reduced to less than significant levels with implementation of Mitigation Measures HAZ-1 and HAZ-2.

Mitigation Measures: Refer to Mitigation Measures HAZ-1 and HAZ-2.

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 nearest airport to the project site is the Compton/Woodley Airport located approximately three miles to the northeast. Based on the *Los Angeles County Airport Land Use Plan*, the project site is located outside of the Airport Influence Area for the Compton/Woodley Airport.[2] Additionally, the project site is not located within the vicinity of a private airstrip or related facilities. Therefore, project implementation would not expose people residing or working in the project area to safety hazards or excessive noise levels associated with aircraft. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

1 California Environmental Protection Agency, *Cortese Listing*, https://calepa.ca.gov/sitecleanup/corteselist/, accessed November 20, 2019.
2 Los Angeles County Department of Regional Planning, *Los Angeles County Airport Land Use Plan*, December 1, 2004.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. As indicated in Section 4.17, *Transportation*, installation of the proposed digital sign structures would not impact vehicular circulation. Additionally, all construction staging would occur within the boundaries of the project site and would not interfere with circulation along surrounding roadways (i.e., Main Street, Del Amo Boulevard, I-405). Thus, project implementation would not interfere with any adopted emergency response plan or emergency evacuation plan. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. The project site is generally surrounded by urban/developed land and no wildland areas are present in the project vicinity. According to the California Department of Forestry and Fire Protection's Fire Hazard Severity Zone (FHSZ) Map for Los Angeles County, the project site is not located in a high fire hazard area for either local or State or Federal responsibility.[3] Therefore, project implementation would not expose people or structures to a significant risk involving wildland fires, and no impacts would occur in this regard

Mitigation Measures: No mitigation is required.

3 California Department of Forestry and Fire Protection, *Los Angeles County Fire Hazard Severity Zones in SRA*, November 7, 2007.

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4.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater 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:				
1) Result in substantial erosion or siltation on- or off-site?			✓	
2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?				✓
3) 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?			✓	
4) Impede or redirect flood flows?			✓	
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) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the Environmental Protection Agency (EPA) has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Regional Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the nine Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The project site is within the jurisdiction of the Los Angeles RWQCB.

CONSTRUCTION

The proposed project would result in nominal impacts to water quality during the short-term construction process due to the handling, storage, and disposal and construction materials, maintenance and operation of construction equipment, and earthmoving activities. Project construction would not disturb more than one acre of soil and thus, would not be required to obtain coverage under the SWRCB's *General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ* (General Construction Permit). According to the project's Phase I Environmental Site Assessment (Phase I ESA), groundwater has been encountered at the project site at a depth of 36.1 feet below ground surface (bgs); refer to Appendix B, *Phase I ESA*. The proposed project would have a maximum excavation depth of approximately 40 feet bgs. Therefore, it is likely that perched groundwater would be encountered during excavation. Project dewatering, if necessary, would be subject to compliance with the *Waste Discharge Requirements for Discharges of Groundwater From Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties* (Order No. R4-2018-0125, NPDES No. CAG994004). Order No. R4-2018-0125, NPDES No. CAG994004 is intended to authorize discharges of treated or untreated groundwater generated from permanent or temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits. Compliance with Order No. R4-2018-0125, NPDES No. CAG994004 requirements would ensure project construction dewatering would not cause State waste discharge and Federal NPDES permit requirements to be exceeded.

Further, project construction activities would be required to comply with the water quality best management practices set forth in Municipal Code Chapter 8, *Storm Water and Urban Runoff Pollution Control*. This chapter contains the City's Storm Water Management and Discharge Control Ordinance and includes conditions and requirements established to control urban pollutant runoff into the City's stormwater system. Compliance with Order No. R4-2018-0125, NPDES No. CAG994004 and Municipal Code Chapter 8 would reduce the project's short-term impacts to water quality to less than significant levels.

OPERATIONS

Operations of the digital sign structures would not have the potential to violate any water quality standards or otherwise substantially degrade surface or groundwater quality above existing conditions. No operational impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. Construction and operations of the proposed project would not increase water demands, including groundwater, and would not result in changes to impervious surfaces on the property. Further, the project site is not currently used for groundwater extraction or groundwater recharge purposes. Although the project site is underlain by perched groundwater, the quality of this source has been affected by the site's former use as an organic refuse landfill. Compliance with Order No. R4-2018-0125, NPDES No. CAG994004 requirements would ensure project construction dewatering would not cause State waste discharge and Federal NPDES permit requirements to be exceeded. As such, implementation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that sustainable groundwater management of the basin would be impeded. At project completion, the new digital sign structures would not substantially alter the project site's pervious conditions or drainage patterns as compared to existing conditions. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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:

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

Less Than Significant Impact. The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river. As discussed in Response 4.10(a), the project would comply with the City's Storm Water Management and Discharge Control Ordinance to minimize erosion and water quality impacts during construction. Construction-related erosion impacts would be reduced to a less than significant level.

At project completion, the new digital sign structures would not alter the project site's pervious conditions or drainage patterns as compared to existing conditions. No operational impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. The project would not alter the drainage pattern of the project site or surrounding area and would not alter the course of a stream or river; refer to Response 4.10(c)(1). Operational activities would not increase the rate or amount of surface runoff, as the site would remain similar to existing conditions (vacant and pervious). As a result, project implementation is not anticipated to increase the rate of surface runoff in a manner which would result in flooding. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. As noted in Responses 4.10(c)(1) and 4.10(c)(2), the proposed project is not anticipated to substantially increase the rate or amount of surface runoff during construction or operational activities. Thus, development of the new digital sign structures would not exceed the capacity of the existing/planned stormwater drainage systems in the project area. Additionally, as indicated in Response 4.10(a), less than significant impacts related to potential polluted runoff from the site would occur, particularly during construction. Therefore, project implementation is not anticipated to create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

4) Impede or redirect flood flows?

Less Than Significant Impact. Refer to Responses 4.10(c)(2) and 4.10(c)(3).

Mitigation Measures: No mitigation is required.

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

No Impact.

FLOOD HAZARD

According to the Federal Emergency Management Agency *Flood Insurance Rate Map Los Angeles County, California and Incorporated Areas, Map No. 06037C1935F* and General Plan EIR Exhibit 4.7-2, *Flood Zone Map*, the project site is located outside of the 100-year flood hazard area.[1] As a result, no impacts would occur in this regard.

TSUNAMI

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. The project site is located over eight miles inland from the Pacific Ocean and is located at a sufficient distance so as not to be subject to tsunami impacts. No impacts would occur in this regard.

SEICHE

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The project site is not in the vicinity of a reservoir, harbor, lake, or storage tank capable of creating a seiche. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) establishes water quality standards for ground and surface waters within the Los Angeles region, which includes the City, and is the basis for the Los Angeles RWQCB's regulatory programs.

The 2014 Sustainable Groundwater Management Act requires local public agencies and groundwater sustainability agencies in high- and medium-priority basins to develop and implement groundwater sustainability plans (GSPs) or prepare an alternative to a groundwater sustainability plan. The project is located within the Coastal Plain of Los Angeles – West Coast groundwater basin, which is designated as a Very Low priority basin.[2] Therefore, there is no groundwater sustainability plan established for the basin. However, the Water Replenishment District of Southern California developed the *Groundwater Basins Master Plan* (GBMP), which identifies projects and programs to enhance basin replenishment, increase reliability of groundwater resources, and improve and protect groundwater quality in the Los Angeles West Coast and Central groundwater basins.[3] As indicated in Response 4.10(b), the proposed project would not result in any water demand and would not deplete groundwater supplies or interfere with groundwater recharge. As a result, the proposed project is not anticipated to conflict with or obstruct with the projects or programs identified in the GBMP and no impact would occur.

Mitigation Measures: No mitigation is required.

1 Federal Emergency Management Agency, *Flood Insurance Rate Map Los Angeles County, California and Incorporated Areas, Map No. 06037C1935F, Panel 1935 of 2350*, September 26, 2008.
2 California Department of Water Resources, *SGMA Basin Prioritization Dashboard*, https://gis.water.ca.gov/app/bp-dashboard/p2/, accessed November 4, 2019.
3 Water Replenishment District of Southern California, *Groundwater Basins Master Plan*, September 2016, https://www.wrd.org/sites/pr/files/GBMP_FinalReport_Text%20and%20Appendicies.pdf, accessed November 4, 2019.

4.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Physically divide an established community?

No Impact. Factors that could physically divide a community include, but are not limited to:

- Construction of major highways or roadways;
- Construction of storm channels;
- Closing bridges or roadways; and
- Construction of utility transmission lines.

The key factor with respect to this threshold is the potential to create physical barriers that change the connectivity between areas of a community to the extent that persons are separated from other areas of the community. The proposed project would not physically divide an established community, as the project would only install digital sign structures and would not affect existing land uses. Thus, the project would not physically divide any established communities in the project vicinity. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact.

GENERAL PLAN CONSISTENCY

Based on the General Plan Land Use Map, the project site is designated Regional Commercial (RC). The RC designation is intended to serve a broad population base and offer a wide range of services to both the community and the region. Businesses in this designation may include major department stores, specialty shops, other retail and service uses, automobile and other vehicle dealerships, and hotels and motels. The proposed digital sign structures would not conflict with the General Plan's intended RC use for the project site. As such, the project would be consistent with the General Plan and impacts would be less than significant.

MUNICIPAL CODE CONSISTENCY

According to the *City of Carson Zoning Map*, the project is zoned Commercial, Regional with a Design and Organic Refuse Landfill Overlay (CR-D-ORL). The CR zone is primarily intended for a major commercial center with a full range of retail merchandise and services that serves a community or subregional area. The "D" Overlay allows for special

site plan and design review for selected areas throughout the City, and the "ORL" Overlay is related to the former organic refuse landfill use of the site.

Zone Text Amendment

Under Municipal Code Section 9146.7 A (3), outdoor advertising signs, including the proposed double-sided digital sign structures, are not permitted in the CR-D-ORL zoned project site. Thus, a Zone Text Amendment is proposed as part of the project to permit the proposed sign structures within the project site. The proposed amendment to Municipal Code Section 9146.7 A (3), if approved, would read:

> For purposes of this Section, the term "I-405 Freeway Corridor" means that portion of the I-405 Freeway that is on the north side of the I-405 Freeway and that is also between ~~Main Street~~ Del Amo Boulevard and Figueroa Street ("~~Main Street~~ Del Amo Boulevard Portion") and that portion of the I-405 Freeway that is between the west line of Alameda Street and a point that is two thousand one hundred (2,100) feet west of the west line of Alameda Street ("Alameda Street Portion").[1]

Upon approval of the proposed Zone Text Amendment, the proposed digital sign structures would be an allowed use on the property and the project would be consistent with Municipal Code Section 9146.7 A (3). Further, it is acknowledged that the Zone Text Amendment only affects the project site, as the language would extend the existing permitted area less than one mile southeast to include the project site.

Development Agreement

All outdoor advertising signs are subject to the approval of a Development Agreement. Therefore, the two proposed double-sided digital sign structures would require a Development Agreement to provide assurance to the City that the project Applicant would construct the project as proposed and also provide assurance to the project Applicant that the project would proceed subject to the rules and regulations in effect at the time of project approval.

Conditional Use Permit

Under Municipal Code Section 9131.12, *Uses Permitted on Organic Refuse Landfill Sites*, any use proposed on a property zoned ORL (Organic Refuse Landfill) can only be permitted through a Conditional Use Permit. Since the project site has an ORL Overlay, the project proposes a Conditional Use Permit as part of the development application for the two digital sign structures.

Variance

Pursuant to Municipal Code Section 9146.7 A (2), the height of an I-405 Freeway Corridor sign structure must either be the height of the current off-premises sign if said sign is being rebuilt or maintained on the same parcel of land. As a result, two Variances are required to permit additional height for the proposed double-sided digital sign structures. As shown on Exhibit 2-4, *New Sign Location*, the new double-sided digital sign would be installed on a vertical column supporting structure with a maximum height of 55 feet. As shown on Exhibit 2-5, *Sign Conversion Location*, the converted double-sided digital sign would be installed on a vertical supporting structure to a maximum height of 65 feet. Under Municipal Code Section 9172.22, *Variance*, two Variances are required to permit the double-sided digital sign structures due to the unique location of the structures and topographical constraints of the signs' influence area. It is acknowledged that although the converted double-sided digital sign structure is taller than others on the project site, the heights of the new double-sided digital sign structures would appear similar to existing sign structures on the project site, which range in height from approximately 44 feet to 55 feet, 10 inches; refer to Exhibit 4.1-2, *Existing and Proposed Sign Structure Elevations*.

1 A double-underline indicates additions, and ~~strikethrough~~ indicates deletions.

Based on the analysis above and upon approval of the requested entitlements, the proposed project would not conflict with the General Plan or applicable Municipal Code regulations. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.12 MINERAL RESOURCES

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

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

No Impact. According to the General Plan EIR, no known mineral resources are located within the City. In addition, according to the State Division of Mines and Geology, no lands within the City has been identified to contain significant aggregate resources.[1] No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. Refer to Response 4.12(a).

Mitigation Measures: No mitigation is required.

1 California Department of Conservation, *Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County*, California, ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/SR_209_Text.pdf, accessed November 4, 2019.

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4.13 NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✓	
b. Generation of excessive groundborne vibration or groundborne noise levels?			✓	
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?				✓

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air, and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear de-emphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately three dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between three dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of three dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA.

REGULATORY FRAMEWORK

Local

Carson General Plan

The General Plan includes interior and exterior noise standards as summarized in Table 4.13-1, *Interior and Exterior Noise Standards*. Table 4.13-1 shows standards and criteria that specify acceptable limits of noise for various land uses throughout Carson.

Table 4.13-1
Interior and Exterior Noise Standards

Type		CNEL	
Categories	**Uses**	**Interior[1,3]**	**Exterior[2,4]**
Residential	Single family Duplex, Multiple Family	45 – 55	50 – 60
	Mobile Home	45	65
Commercial Industrial Institutional	Hotel, Motel, Transient Lodging	45	—
	Commercial Retail, Bank, Restaurant	55	—
	Office Building, Research and Development, Professional Offices, City Office Building	50	—
	Amphitheater, Concert Hall, Auditorium, Meeting Hall	45	—
	Gymnasium (Multipurpose)	50	—
	Sports Club	55	—
	Manufacturing, Warehousing, Wholesale, Utilities	65	—
	Movie Theaters	45	—
Institutional	Hospital, Schools Classrooms	45	65
	Church, Library	45	—
Open Space	Parks	—	65

Notes: CNEL = community noise equivalent level

1. Indoor environment includes bedrooms, living areas, bathrooms, toilets, closets, and corridors.
2. Outdoor environment is limited to private yards of single family residences; multi-family private patios or balconies that are served by a means of exist from inside the dwelling; balconies six feet deep or less are exempt; mobile home parks; park picnic areas; and school playgrounds.
3. Noise level requirement with closed windows. Mechanical ventilating system or other means of natural ventilation shall be provided as required pursuant to Uniform Building Code Chapter 12, Section 1205.
4. Exterior noise levels should be such that interior noise levels do not exceed 45 CNEL.

Source: City of Carson, *Carson General Plan*, 2004.

City of Carson Municipal Code

Chapter 5 of the Municipal Code contains noise control regulations. The City adopted the "Los Angeles County Noise Ordinance" as the City's Noise Control Ordinance in 1995. The Noise Control Ordinance, derived from *Los Angeles County Code* Section 12.08.390, *Exterior Noise Standards*, and Section 12.08.400, *Interior Noise Standards*, establish exterior and interior noise standards to regulate operation intrusive noises within specific land use zones. These noise standards are summarized in Table 4.13-2, *Noise Ordinance Standards*.

Table 4.13-2
Noise Ordinance Standards

Noise Zone	Land Use (Receptor Property)	Time Interval	Noise Level (dBA)	
			Exterior	Interior
I	Noise Sensitive-Area	Anytime	45	—
II	Residential Properties	10:00 p.m. to 7:00 a.m. (nighttime) 7:00 a.m. to 10:00 p.m. (daytime)	45 50	— —
III	Commercial Properties	10:00 p.m. to 7:00 a.m. (nighttime) 7:00 a.m. to 10:00 p.m. (daytime)	55 60	— —
IV	Industrial Properties	Anytime	70	—
All Zones	Multi-family	10:00 p.m. to 7:00 a.m.	—	40
	Residential	7:00 a.m. to 10:00 p.m.	—	45
Notes: dBA = A-weighted decibel scale				
Source: County of Los Angeles, Los Angeles County Code Section 12.08.490 and 12.08.400, November 7, 2019.				

Municipal Code Section 5502(c), *Amendments to Noise Control Ordinance*, provides exterior noise standards that regulate construction noise near residential uses. Noise standards for non-scheduled, intermittent, short-term operations (less than 20 days), as well as standards for repetitively scheduled and relatively long-term construction operations (periods of 21 days or more) of equipment are summarized in Table 4.13-3, *Maximum Construction Noise Limits*.

Table 4.13-3
Maximum Construction Noise Limits

Construction Time		Maximum Allowed Noise Level (dBA)	
		Single Family Residential	Multi-Family Residential
Maximum noise levels for non-scheduled, intermittent, short-term operation of 20 days or less for construction equipment.	Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	75	80
	Daily, except 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	60	64
Maximum noise level for repetitively scheduled and relatively long-term operation of 21 days or more for construction equipment.	Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	65	70
	Daily, except 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	55	60
Notes: dBA = A-weighted decibel scale			
Source: City of Carson, City of Carson Municipal Code Section 5502(c), September 3, 2019.			

EXISTING CONDITIONS

Stationary Sources

The project site is located on a vacant site along I-405. Surrounding land uses generally include I-405, the Dominguez Channel, Goodyear Blimp Base Airport, The Links at Victoria Golf Course, Porsche Experience Driving Center, and industrial uses. As the project site is currently vacant, there are no stationary noise sources on the project site.

Mobile Sources

The majority of existing noise in the project area is generated by vehicular traffic along I-405, a major freeway that accommodates a substantial amount of regional traffic through southern California. The I-405 segment adjacent to the project site (Post Mile 12.97) carries approximately 272,000 annual average daily traffic (AADT) northbound and 275,000 AADT southbound.[1] Other mobile noise sources include vehicular traffic along Main Street and Del Amo Boulevard, as well as airplanes flying over the project site.

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

Less Than Significant Impact. It is difficult to specify noise levels that are generally acceptable to everyone; noise that is considered a nuisance to one person may be unnoticed by another. Standards may be based on documented complaints in response to documented noise levels, or based on studies of the ability of people to sleep, talk, or work under various noise conditions.

CONSTRUCTION

Construction of the proposed project would occur over approximately one month and would include demolition, excavation, trenching, and construction. Groundborne noise and other types of construction-related noise impacts would typically occur during excavation activities during the grading phase. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment are shown in Table 4.13-4, *Maximum Noise Levels Generated by Construction Equipment*. It should be noted that the noise levels identified in Table 4.13-4 are maximum sound levels (L_{max}), which are the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

The nearest sensitive receptors are residential homes located approximately 1,800 feet to the east of the proposed project site. The potential for construction-related noise to affect these nearby residential receptors would depend on the location and proximity of construction activities to these receptors. Construction would occur throughout the project site and would not be concentrated or confined in the area by these to sensitive receptors. Therefore, construction noise would be acoustically dispersed throughout the project site and not concentrated in one area near. It should also be noted that the noise levels depicted in Table 4.13-4 are maximum noise levels.

1 California Department of Transportation, *2016 Traffic Volumes on the California State Highway System*, 2016.

Table 4.13-4
Maximum Noise Levels Generated by Construction Equipment

Type of Equipment	Acoustical Use Factor[1]	L_{max} at 50 Feet (dBA)	L_{max} at 1,800 Feet (dBA)
Crane	16	81	48
Concrete Mixer Truck	40	79	48
Backhoe	40	78	47
Dozer	40	82	51
Excavator	40	81	50
Forklift	40	78	47
Paver	50	77	46
Roller	20	80	49
Tractor	40	84	53
Water Truck	40	80	49
Grader	40	85	54
General Industrial Equipment	50	85	54

Notes: dBA = dBA = A-weighted decibels; L_{max} = Maximum Sound Level

1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during construction operation.

Source: Federal Highway Administration, *Roadway Construction Noise Model (FHWA-HEP-05-054),* January 2006.

As depicted in Table 4.13-4, the residential receptors near the project site could be exposed to temporary and intermittent noise levels up to 54 dBA, which would not exceed the City's construction noise standard of 65 dBA. Therefore, project construction activities would not generate noise levels in excess of City standards. A less than significant impact would occur in this regard.

OPERATIONS

Mobile Noise

The existing on-site sign structures require periodic vehicle trips for routine maintenance and these trips would continue to occur after implementation of the proposed project. The project would not generate new vehicle trips. Thus, the project would not change the existing mobile noise levels and no impact.

Stationary Noise Impacts

The proposed double-sided digital sign structures would not produce any stationary or mechanical noise. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The

effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Caltrans *Transportation and Construction Vibration Manual* identifies various vibration damage criteria for different building classes. As the nearest structures to project construction are industrial buildings approximately 200 feet to the north of the northern project boundary, the architectural damage criterion for continuous vibrations at modern industrial/commercial buildings of 0.5 inch-per-second PPV is utilized. The types of construction vibration impact include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural.

The highest degree of groundborne vibration would be generated during the building construction phase due to the operation of a large bulldozer. Based on the Federal Transit Administration (FTA) data, vibration velocities from large bulldozer operations would be 0.089 inch-per-second PPV at 25 feet from the source of activity and 0.0039 inch-per second PPV at 200 feet from the source of activity.[2] As such, bulldozer operations during project construction would not experience groundborne vibration above the Caltrans significance threshold (i.e. 0.5 inch-per-second PPV). Thus, impacts would be less than significant.

Mitigation Measures: No mitigation is required.

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

No Impact. The nearest airport to the project site is the Compton/Woodley Airport located approximately three miles to the northeast in the City of Compton. According to the General Plan, the 60 dBA and 65 dBA noise contours from the Compton/Woodley Airport do not extend into the City of Carson.

The project site is located to the west of the Goodyear Blimp Base Airport across the Dominguez Channel; refer to Exhibit 2-2, *Site Vicinity*. While the site is less than 500 feet from the Goodyear Blimp Base Airport, the project does not propose any habitable structures. Therefore, project implementation would not expose people residing or working in the project area to excessive noise levels associated with the Goodyear Blimp Base Airport. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

2 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

4.14 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) 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. A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. The proposed project would not involve habitable structures nor would the project result in any new employment opportunities. In addition, no new infrastructure that could induce unplanned growth elsewhere would be constructed. Thus, the project would not result in direct or indirect growth in the City's population. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. As shown on Exhibit 2-2, *Site Vicinity*, the project site is currently vacant, and no housing exists on-site or in the project vicinity. Therefore, project implementation would not displace any existing housing or people. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.15 PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
1) Fire protection?				✓
2) Police protection?				✓
3) Schools?				✓
4) Parks?				✓
5) 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:

1) Fire protection?

No Impact. The County of Los Angeles Fire Department (LACFD) provides fire protection services to the City and project site. According to the General Plan EIR, there are six primary fire stations that provide both fire and emergency services to the City, four of which are within the City's boundaries. The closest fire station to the project is Station #79, located approximately one mile to the northwest of the project site at 18030 South Vermont Avenue in the City of Gardena.

The proposed project would not construct habitable structures. As a result, project construction would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. The project would not adversely impact service ratios, response times, or other LACFD performance standards. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

2) Police protection?

No Impact. The Los Angeles County Sheriff's Department (LASD) provides sheriff protection services to the City and the project site. The project site is within the service area of the LASD Carson Station, which provides sheriff services to the City of Carson, and unincorporated County areas in Gardena, Torrance, and Rancho Dominguez. The Carson Station is located approximately one mile to the southeast of the site at 21356 South Avalon Boulevard.

The proposed project would not construct habitable structures. As a result, project construction would not result in the need for new or physically altered sheriff protection facilities, the construction of which could cause significant environmental impacts. The project would not adversely impact service ratios, response times, or other LACSD performance standards. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

3) Schools?

No Impact. Installation of the proposed digital sign structures would not generate the need for new or physically altered school facilities. The project does not involve the construction of habitable structures and would not directly or indirectly induce population growth in the area; refer to Response 4.14(a). No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

4) Parks?

No Impact. The project would not generate the need for new or physically altered park facilities. The project does not involve the construction of habitable structures and would not directly or indirectly induce population growth in the area; refer to Response 4.14(a). No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

5) Other public facilities?

No Impact. The proposed project would not result in significant impacts on public services or facilities; refer to Responses 4.15(a)(1) through 4.15(a)(4). No other public facilities are anticipated to be affected by the project. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

4.16 RECREATION

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

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

No Impact. Refer to Response 4.15(a)(4).

Mitigation Measures: No mitigation is required.

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

No Impact. Refer to Response 4.15(a)(4).

Mitigation Measures: No mitigation is required.

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4.17 TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✓	
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?[1]			✓	
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?				✓

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

Less Than Significant Impact. Installation of the proposed digital sign structures would not generate any new land uses or associated vehicle trips that would have the potential to conflict with a plan, ordinance, or policy addressing the circulation, including transit, roadway, bicycle, and pedestrian facilities. The project site is located adjacent to a variety of existing transportation facilities. The General Plan designates Main Street and Del Amo Boulevard as major highways that accommodate inter-city vehicular trips in the magnitude of 25,000 or more vehicles per day. There are no bus stops or existing bicycle facilities along the project perimeter which would be affected by project implementation. Several future bicycle facilities are identified along the project perimeter by the *Carson Master Plan of Bikeways*, including a bike lane along South Main Street, a cycletrack along the Dominguez Channel, and a colored buffered bike lane along Del Amo Boulevard.[2] Pedestrian sidewalks are also provided along westbound Main Street and Del Amo Boulevard.

CONSTRUCTION

Construction-related traffic would occur over a period of four weeks. This short-term traffic would include delivery of construction materials, transfer of construction equipment, and construction worker trips. Approximately 40 cubic yards of export would be required to dig the foundation hole for the vertical supporting structures, which would result in a negligible number of hauling trips. Although construction traffic may have the potential to temporarily impact the local circulation system, the scope of construction activity at the project site is expected to be limited. A relatively limited number of construction employees and deliveries would occur, and it is not anticipated that adverse impacts to the local roadway network would occur as a direct result of construction trips. Impacts would be less than significant in this regard.

1 While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles traveled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on the City's adopted traffic analysis methodology, which requires use of Level of Service to evaluate traffic impacts of a project.

2 City of Carson, *Carson Master Plan of Bikeways*, August 2013.

OPERATIONS

Implementation of the proposed project would result in the installation a new digital sign structures on the project site. The existing sign structures on the project site require periodic vehicle trips for routine maintenance. These trips would continue to occur after implementation of the proposed project and are not anticipated to be greater than the existing condition. Therefore, no long-term operational impacts would result.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The *Los Angeles County Congestion Management Program* (CMP), prepared by the Los Angeles County Metropolitan Transportation Authority (LA Metro), is intended to reduce traffic congestion and provide a mechanism for coordinating land use and development decisions throughout Los Angeles County.[3] The CMP states that if a project generating 50 or more trips during either the a.m. or p.m. weekday peak hours for intersections, or more than 150 trips on the freeway in either direction, a CMP traffic impact analysis is required.

Based on the CMP, I-405 (San Diego Freeway) is designated a CMP freeway by LA Metro. However, as stated in Response 4.17(a), long-term operation of the project would not generate an increase in vehicle trips along nearby roadways as compared to existing conditions. The short-term construction process for the project would result in a negligible increase in vehicle trips, which would cease upon construction completion. Thus, the project would not generate 50 or more trips during either the a.m. or p.m. weekday peak hours for intersections, or more than 150 trips on the freeway in either direction. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The project does not propose changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways (e.g., farm equipment or trucking facilities). No changes to the site's existing driveway at Main Street are proposed, and roadways within the project area, including Main Street, Del Amo Boulevard, and the I-405 freeway would remain open to traffic at all times. Further, the project would be subject to compliance with the State's Outdoor Advertising Act (ODA) (Business and Professions Code Section 5200 to 5486). The ODA includes several outdoor advertising design regulations to promote the public safety, health, and welfare of public travel. For example, Business and Professions Code Section 5401 requires advertising structures to withstand a wind pressure of 20 pounds per square foot of exposed surface. Business and Professions Code Section 5403 requires that signs are maintained in safe conditions and prohibits the use blinking or intermittent light and any illumination that could impair the vision of travelers on adjacent highways. Mandatory compliance with the regulations identified in the ODA would ensure the project does not increase hazards due to a design feature. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

3 Los Angeles County Metropolitan Transportation Authority, *2010 Congestion Management Program*, 2010.

d) Result in inadequate emergency access?

No Impact. As detailed above in Response 4.17(c), the site's existing driveway at Main Street would be maintained, and roadways within the project area would remain open to traffic at all time. As a result, project implementation would not have the potential to result in inadequate emergency access. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.18 TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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:				
1) 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				✓
2) 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.		✓		

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Section 21074 of AB 52 also defines a new category of resources under CEQA called "tribal cultural resources." Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources (CRHR) or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

In compliance with AB 52, the City of Carson distributed letters notifying each tribe that requested to be on the City's list for the purposes of AB 52 of the opportunity to consult with the City regarding the proposed project. The letters were distributed by certified mail on November 25, 2019. The tribes had 30 days to respond to the City's request for consultation. No tribal representatives engaged in consultation as of December 25, 2019.

On February 19, 2016, the California Natural Resources Agency proposed to adopt and amend regulations as part of AB 52 implementing Title 14, Division 6, Chapter 3 of the California Code of Regulations, CEQA Guidelines, to include consideration of impacts to tribal cultural resources pursuant to Government Code Section 11346.6. On September 27, 2016, the California Office of Administrative Law approved the amendments to Appendix G of the CEQA Guidelines, and these amendments are addressed within this Initial Study.

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

1) 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)?

No Impact. As detailed in Response 4.5(a), no historic resources listed or eligible for listing in a State or local register of historic resources are located on the project site. Therefore, no impacts related to historic tribal cultural resources defined in Public Resources Code Section 5020.1(k) would occur in this regard.

Mitigation Measures: No mitigation is required.

2) 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. As noted above, the City distributed letters to potentially affected Native American tribes which have cultural or traditional affiliation with the City in accordance with AB 52 requirements. No tribal representatives engaged in consultation with the City during the project's 30-day tribal consultation period. As discussed in Section 4.5, *Cultural Resources*, installation of the proposed digital sign structures would encounter native soils which have the potential to support buried archaeological resources. In the unlikely event that archaeological resources are encountered during project construction, Mitigation Measure CUL-1 would require all project construction efforts to halt until an archaeologist examines the site, identifies the archaeological significance of the find, and recommends a course of action. Upon implementation of Mitigation Measure CUL-1, potential impacts to tribal cultural resources would be reduced to less than significant levels.

Mitigation Measures: Refer to Mitigation Measure CUL-1.

4.19 UTILITIES AND SERVICE SYSTEMS

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

a) Require or result in the relocation or construction of new or expanded water, or wastewater 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. Installation of the proposed digital sign structures would not require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The proposed digital sign structures would utilize existing electricity facilities serving the project site. As noted in Section 4.6, *Energy*, the proposed project would result in an annual electricity consumption of 160 megawatt hours (mWh) per year. The project's annual electricity consumption would represent an approximate 0.0002 percent increase in electricity consumption over the current County-wide usage and would not require or result in the relocation or construction of new or expanded electric power facilities. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. Refer to Response 4.19(a).

Mitigation Measures: No mitigation is required.

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

No Impact. Refer to Response 4.19(a).

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. The proposed project would not include any habitable structures which would generate solid waste during long-term operations. Although the project may require limited disposal of excavation spoils during construction (approximately 40 cubic yards), the generation of these materials would be short-term in nature and would not have the capability to substantially affect the capacity of regional landfills. The project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to "reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible." The California Integrated Waste Management Act of 1989 requires that at least 50 percent of waste produced is recycled, reduced, or composted. As discussed in Section 4.9, *Hazards and Hazardous Materials*, all excavated soils would be disposed of in accordance with Department of Toxic Substances Control requirements. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Refer to Response 4.19(d) above. The proposed project would comply with all Federal, State, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act and City requirements for solid waste generated during the construction process. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

4.20 WILDFIRE

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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. According to the California Department of Forestry and Fire Protection's *Los Angeles County Fire Hazard Severity Zones in SRA Map*, the City of Carson is not located in or near a State responsibility area nor is the City designated as a very high fire hazard severity zone.[1] No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation is required.

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?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation is required.

1 California Department of Forestry and Fire Protection, *Los Angeles County Fire Hazard Severity Zones in SRA Map*, updated November 7, 2007.

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?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation is required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below 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. As concluded in Section 4.4, *Biological Resources*, the project site is disturbed and is located within an urbanized area of the City. Based on the site's disturbed and urbanized conditions, no sensitive plant and animal species occur on-site. Thus, the project would have no impacts on sensitive plant or animal species. As indicated in Section 4.5, *Cultural Resources*, and Section 4.18, *Tribal Cultural Resources*, project implementation is not anticipated to result in impacts to cultural or tribal cultural resources based on the site's disturbed condition and past use as an organic refuse landfill site. However, in the unlikely event that buried archaeological resources are encountered during ground disturbance activities, Mitigation Measure CUL-1 would require all project construction efforts to halt until an archaeologist examines the site, identifies the archaeological significance of the find and recommends a course of action. As noted in Section 4.18, No Native American tribes requested consultation during the project's 30-day AB 52 consultation period. Nonetheless, implementation of Mitigation Measure CUL-1 would reduce the project's potential environmental impacts to previously undiscovered tribal cultural resources to a less than significant level. In the unlikely event that paleontological resources are encountered during project construction, Mitigation Measure GEO-1 would require all revised project construction activities to halt until a paleontologist identifies the paleontological significance of the find and recommends a course of action. Therefore, the proposed project would not potentially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to

eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

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. A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As concluded in Sections 4.1 through 4.20, the proposed project would not result in any significant impacts in any environmental categories with implementation of project mitigation measures. Implementation of mitigation measures at the project-level would reduce the potential for the incremental effects of the proposed project to be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects.

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. Previous sections of this Initial Study reviewed the proposed project's potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, traffic, and other issues. As concluded in these previous discussions, the proposed project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, following conformance with the existing regulatory framework and mitigation measures. Further, as the project involves the installation of digital sign structures, the project's features are not anticipated to result in direct or indirect adverse effects to human beings. Impacts would be less than significant in this regard.

4.22 REFERENCES

The following references were utilized during preparation of this Initial Study/Mitigated Negative Declaration. These documents are available for review at the City of Carson Planning Division located at 701 East Carson Street, Carson, California 90745.

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4.23 REPORT PREPARATION PERSONNEL

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5.0 CONSULTANT RECOMMENDATION

Based on the information and environmental analysis contained in the Initial Study/Environmental Checklist, we recommend that the City of Carson prepare a mitigated negative declaration for the 19500 Main Street Digital Billboards Project. We find that the proposed project could have a significant effect on a number of environmental issues, but that mitigation measures have been identified that reduce such impacts to a less than significant level. We recommend that the second category be selected for the City of Carson's determination (see Section 6.0, *Lead Agency Determination*).

January 15, 2020
Date

Alicia Gonzalez, Project Manager
Michael Baker International

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6.0 LEAD AGENCY DETERMINATION

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☒

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

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Signature: MBhatia

Title: Assistant Planner

Printed Name: Manraj Bhatia

Agency: City of Carson

Date: January 15, 2020

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