FEHR PEERS

Draft Memorandum

Date: September 4, 2024

To: 21140 AVALON BLVD, LLC | Vince Manzenberger

From: Miguel Núñez and Dylan Di, Fehr & Peers

Subject: Carson Kott Site Residential Project CEQA Assessment

LB24-0128

Project Description

The proposed Project (the "Project") analyzed in this study involves the construction of 283 townhome dwelling units and 32 affordable units at 21140 Avalon Boulevard, at the northeast corner of Avalon Boulevard & East 213th Street in the City of Carson. In addition to the 315 dwelling units the project will provide 643 parking spaces (566 spaces in private garages and 77 open parking spaces) and an internal roadway system providing access to designated parking areas. Project access will be provided via two driveways: one on Avalon Boulevard and another on East 213th Street. The site plan is shown in **Figure 1**. The purpose of this memorandum is to document the approach for determining potential significance of the Project's transportation related environmental effects per CEQA Guidelines Section 15064.

CEQA Assessment

CEQA Guidelines Section 15064 provides guidance for the process and approaches that may be used for determining environmental effects. Per Section 15064 (f)(7), the provisions of Section 15162 apply "when the project being analyzed is a change to, or further approval for, a project for which an Environmental Impact Report (EIR) or negative declaration was previously certified or adopted." The Project approval is proposed as an addendum to the General Plan EIR, which analyzed the potential for residential development at this site.

CEQA Guidelines Section 15162 states that "when an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following":

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted.

Transportation Related Qualifications

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

Fehr & Peers reviewed the General Plan EIR and related information such as the City's zoning map, City of Carson Transportation Analysis Guidelines, and Southern California Association of Governments (SCAG) travel demand model land use inputs for the Project area used for the recent Carson 2040 General Plan (the "General Plan") EIR. The General Plan EIR transportation section identified significant impacts associated with home-based per capita VMT and total VMT per service population. The home-based per capita VMT impact was mitigated to a level below significance with various strategies. The total VMT per service population impact was determined to be significant and unavoidable. Additionally, since the City of Carson could not demonstrate a reduction of 15 percent or more for total VMT per service population, the General Plan makes an incremental but significant contribution to a cumulative regional impact. In addition, the General Plan found no significant transportation impacts related to inadequate emergency access, substantial increase in hazards due to a geometric design feature, or conflict with adopted circulation program, plan, ordinance, or policy.

The site is designated by the General Plan as Downtown Mixed Use, which allows active commercial uses and residential uses. The General Plan EIR analysis and significant impacts related to VMT are based on the SCAG model and General Plan land uses, and VMT methodologies and thresholds of significance adopted by the City of Carson. The General Plan analysis forecasted increases in residential unit and population growth in the project vicinity and the Project is within the analyzed level of growth. As described above, the General Plan EIR disclosed transportation impacts relating to VMT and this project does not exceed the development density or intensity contemplated by the General Plan and therefore and would not

require major revisions to the prior EIR due to new significant increase in the severity of identified impacts.

The General Plan EIR also analyzed the other transportation related CEQA areas and did not find a significant impact and the Project is consistent with those conclusions as discussed below:

- Conflict with adopted circulation program, plan, ordinance, or policy: The General Plan EIR analysis reviewed programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities and found no conflicts. The project is consistent with City policies, programs, and ordinances such as increasing residential housing near corridors with transit, promoting active transportation, and directing commuter traffic to arterial streets and collectors, as appropriate. The project would be consistent with City ordinances and would not preclude the implementation of a policy or projects identified in the City's Bike Plan.
- Substantially increasing hazards due to a geometric design feature: The General Plan EIR analysis found no significant impact for this issue area and discusses the design of access points, addressing or reducing potential conflict points of various users, and considering the relation of land uses and road users including commercial and truck traffic, commuter traffic, pedestrians, and cyclists. Review of project access is conducted for each individual project to confirm compliance with City standards and address the provision of adequate sight distance, sidewalks, crosswalks, and traffic control to minimize potential negative effects. The Project will have two driveways that align with existing driveway locations with sidewalks, turn lanes, and striping. The project will not introduce new access points or additional geometric design features to the public right-of-way that would substantially increase hazards due to a geometric change.
- Result in inadequate emergency access: The General Plan EIR reviewed emergency accessibility at a programmatic level and determined the update would not result in inadequate emergency access. The project is located at the northeast corner of Avalon Boulevard & 213th Street, which are respectively six and four-lane corridors fronting the project site. The project will not make alterations to the public right-of-way or physical environment that would negatively impact emergency access to the site or along the adjacent corridors.

Additional information regarding the project is now available that support this finding. The relevant information now available includes:

- The project includes construction of 32 affordable infill housing units, which can help improve the jobs-housing match and shorten commute VMT. In areas with more balanced jobs-housing match, affordable housing has been shown to generate lower VMT than market rate housing. Per OPR guidance a project consisting of a high percentage of affordable units my be a basis for the lead agency to find a less than significant impact for a 100% affordable residential project or residential portions of

mixed-use projects, and a project which includes any affordable residential units may factor the effect of the affordable units on VMT in the VMT assessment for those units.

- The project has voluntarily proposed to include a reduced parking supply. Reduction of parking supply is considered an effective VMT reducing strategy as it incentivizes lower car ownership and use of non-vehicle modes for everyday travel.
- The project has voluntarily proposed to share bicycle and transit information, such as maps and schedules, that would make it easier for residents to visit nearby destinations without a vehicle. There are shopping and employment areas along Avalon Boulevard and Carson Street within a mile, which is within the distance residents may be willing to walk, bike, or take transit for local trips.

As described above, known changes to the project from what was previously analyzed, would not contribute to increased VMT and would not lead to a more severe adverse impact since the certification of the General Plan Final EIR and the adoption of the General Plan in April 2023. Therefore, the Project is consistent with the General Plan EIR analyses and would not result in new significant effects or an increase in the severity of previously identified significant effects due to changes in the project.

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

The Project site is adequately sized to accommodate internal circulation and proposed units consistent with the City's requirements. There are no atypical aspects of the Project or parcel that are anticipated to have specific or additional transportation related environmental effects associated with the Project compared with the General Plan.

The General Plan EIR transportation section identified significant impacts associated with home-based per capita VMT and total VMT per service population. The home-based per capita VMT impact was mitigated to a level below significance with various strategies. The total VMT per service population impact was determined to be significant and unavoidable. Additionally, since the City of Carson could not demonstrate a reduction of 15 percent or more for total VMT per service population, the General Plan makes an incremental but significant contribution to a cumulative regional impact.

The General Plan EIR also analyzed the other transportation related CEQA areas and did not find a significant impact. The circumstances under which the Project is undertaken are consistent with those conclusions as discussed below.

- Conflict with adopted circulation program, plan, ordinance, or policy: The General Plan EIR analysis reviewed programs, plans, ordinances, and policies addressing the circulation

system, including transit, roadway, bicycle, and pedestrian facilities and found no conflicts. The project is consistent with City policies, programs, and ordinances such as increasing residential housing near corridors with transit, promoting active transportation, and directing commuter traffic to arterial streets and collectors, as appropriate. The project would be consistent with City ordinances and would not preclude the implementation of a policy or projects identified in the City's Bike Plan. Therefore, no additional impacts from conflicts with program, plan, ordinance, or policy would be expected to occur to the circumstances under which the project is undertaken.

- Substantially increasing hazards due to a geometric design feature: The General Plan EIR analysis found no significant impact for this issue area and discusses the design of access points, addressing or reducing potential conflict points of various users, and considering the relation of land uses and road users including commercial and truck traffic, commuter traffic, pedestrians, and cyclists. Review of access is conducted for each individual project to confirm compliance with City standards and address the provision of adequate sight distance, sidewalks, crosswalks, and traffic control to minimize potential negative effects. The Project is consistent with aspects analyzed in the General Plan, such as the parcel's shape or size, compared to what was analyzed for the General Plan. The Project will include two existing driveway locations with sidewalks, turn lanes, and striping, and will not introduce a new driveway. The project will utilize existing access points or additional geometric design features to the public right-of-way that would substantially increase hazards due to a geometric change. Therefore, the Project won't be expected to have additional environmental impacts due to geometric changes with respect to the circumstances.
- Result in inadequate emergency access: The General Plan EIR reviewed emergency accessibility at a programmatic level and determined the update would not result in inadequate emergency access. The project is located at the northeast corner of Avalon Boulevard & 213th Street, which are respectively six and four-lane corridors fronting the project site. The project will not make alterations to the public right-of-way or physical environment that would negatively impact emergency access to the site or along the adjacent corridors.

Because the General Plan EIR identified a mitigable home-based per capita VMT impact and a significant and unavoidable total VMT per service population impact, the Project would not result in substantial changes occur with respect to the circumstances and new or more severe significant environmental effects identified in the General Plan EIR.

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

(a). The Project will have one or more significant effects not discussed in the previous EIR or negative declaration.

As described in the prior sections, the Project does not exceed the density or intensity studied in the General Plan and would comply with City ordinances and policies. There is no substantial new information or unique aspects of the project which would lead to additional impacts since the certification of the General Plan Final EIR and the adoption of the General Plan in April 2023. Therefore, the Project would not be expected to have significant effects not discussed in the General Plan EIR.

High and low VMT maps were prepared when the City's Transportation Study Guidelines were developed. The maps indicate that this site is located in a portion of Carson where daily home-based VMT per capita is 13.1, which is nine percent less than the City average of 14.4, indicating the site is in a lower VMT area compared with the City's per capita average VMT for residential land uses.

The project would not conflict with or preclude the implementation of mitigations discussed in the EIR. The project has agreed to voluntarily provide maps and schedules with information pertaining to local transit services and bicycle facilities that can be used by residents for local travel.

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

As described in the prior sections, there is no substantial new information which would lead to more severe impacts since the certification of the General Plan Final EIR and the adoption of the General Plan in April 2023., As discussed above, this project is located in an area that exhibits a reduction relative to the City's average per capita VMT for residential uses. Therefore, the Project would not be expected to have any more severe adverse impacts related to transportation due to new information.

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

The General Plan EIR transportation section identified significant impacts associated with home-based per capita VMT and total VMT per service population. The home-based per capita VMT impact was mitigated to a level below significance with various strategies. The total VMT per service population impact was determined to be significant and unavoidable. All mitigation measures analyzed in the General Plan EIR were feasible. There is no new information to inform that the impacts of mitigation measures have changed since the adoption of the General Plan in

April 2023. Therefore, the Project will not have mitigation measures previously found not to be feasible in fact be feasible.

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

As described in the prior sections, the home-based per capita VMT impact was mitigated to a level below significance with various strategies, and the total VMT per service population impact was determined to be significant and unavoidable. The General Plan EIR adopted all feasible mitigation measures analyzed. There is no new information to inform that any mitigation measures or alternatives that were considerably different from those analyzed in the previous EIR would substantially reduce any significant effects. Therefore, the Project will not have mitigation measures considerably different from those analyzed in the previous EIR.

Conclusion

The Project does not exceed the development density or intensity contemplated by the General Plan and therefore would comply with City ordinances and policies. Furthermore, the Project would not be expected to have additional adverse impacts related to transportation that were not analyzed in the General Plan EIR due to factors such as an affordable housing component, lower than City average per capita VMT for residential land uses, and voluntary provision of reduced parking, transit maps, and bike maps. There is no new or unique information pertaining to the project or mitigation measures identified in the General Plan EIR that result in new information that would trigger new or more severe impacts. Therefore, the Project would be eligible for an addendum to the General Plan EIR, which analyzed the potential for residential development at this site, instead of a full subsequent EIR.

SITE PLAN KEYNOTES

1. PROPERTY LINE
2. ENTRY GATE
3. TRASH ENCLOSURE
4. PERPENDICULAR PARKING SPACE (9'X18')
5. ACCESSIBLE PARKING SPACE (9'X18')
6. ACCESSIBLE PATH OF TRAVEL
7. AMENITY AREA (SEE LANDSCAPE PLANS)
8. MAIL PARKING SPACE

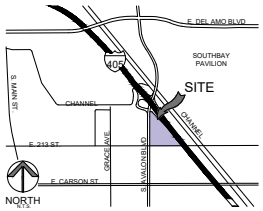
NOTE: ALL NON-ADA COMPLIANT SIDEWALK RAMPS ABUTTING THE PROJECT SITE WILL BE UPGRADED TO CURRENT CODE

LEGEND

- PRODUCT A
- PRODUCT B
- PRODUCT C
- PRODUCT D
- CLUBHOUSE
- PROPERTY LINE
- ACCESSIBLE PATH OF TRAVEL
- TYPICAL PERPENDICULAR & ACCESSIBLE PARKING SPACE (18'-0" / 9'-0")
- A — ACCESSIBLE UNIT
- UNIT ENTRY
- 1 / A — Building Number / Building Type

*Site Plan shall meet all Engineering and NPDES requirements.

VICINITY MAP



Overall Site Summary

Gross Site Area	*14.08 Acres*
Affordable Units	*32 du*
Townhome Units	*283 du*
Total Dwelling Units	315 du
Gross Density	22.4 Du/Ac
Existing Zoning / Land Use	Commercial, Automotive
Proposed Zoning / Land Use	Commercial, Automotive

Overall Building Summary

Building Type	Quantity	Bldg Footprint Area	Gross Bldg Area	Total Area
Building A2 - Affordable	4	938 sf	938 sf	3,752 sf
Building A3 - Affordable	8	1,407 sf	1,407 sf	11,256 sf
Product B - 5 Plex	13	3,346 sf	11,098 sf	144,274 sf
Product B - 6 Plex	3	4,013 sf	13,227 sf	39,681 sf
Product C - 8 Plex	2	5,336 sf	18,351 sf	36,702 sf
Product C - 10 Plex	7	6,614 sf	21,522 sf	150,654 sf
Building D - 6 Plex	3	4,529 sf	14,033 sf	42,099 sf
Building D - 8 Plex	12	5,759 sf	17,911 sf	214,932 sf
Pool Building	1	437 sf	437 sf	437 sf
Total				643,787 sf
FAR				1.05
Building Coverage			34.3%	210,647 sf

Townhome Site Summary

Townhome Site Area	*12.92 Acres*
Townhome Dwelling Units	283 du
Density	21.9 Du/Ac

Townhome Plan Summary

Plan	Beds	Net Unit Area	Quantity	%	Total Net Area	Avg. Unit Size
B Townhomes - P1	3	1,510 sf	51	18.0%		
B Townhomes - P2	3	1,714 sf	32	11.3%		
Subtotal B Townhomes			83			
C B2B - P1	2	1,375 sf	50	17.7%		
C B2B - P2	3	1,578 sf	36	12.7%		
Subtotal B2B			86			
D Rowtowns - P1	2	1,213 sf	12	4.2%		
D Rowtowns - P2	2	1,211 sf	12	4.2%		
D Rowtowns - P3	3	1,522 sf	45	15.9%		
D Rowtowns - P4	4	1,773 sf	45	15.9%		
Subtotal D Rowtowns			114			
Total			283	100%	434,779 sf	1,536 sf

Unit Mix	Quantity	%
2 Bedroom Total	74	26.1%
3 Bedroom Total	164	58.0%
4 Bedroom Total	45	15.9%
Total	283	100.0%

Townhome Open Space Summary

Private Open Space	24,377 sf	86 sf/Unit
Common Open Space	*106,390 sf*	
Total Open Space	130,767 sf	462 sf/Unit

Townhome Parking Summary - State Density Bonus Standard

Parking Required	Quantity	Ratio Req'd	Spaces Req'd
2 Bed	74	*1.50 Spaces/Unit*	111
3 Bed	164	*1.50 Spaces/Unit*	246
4 Bed	45	*2.00 Spaces/Unit*	90
Total Residential Parking Req'd		1.58 Spaces/Unit	447
Parking Provided		**Ratio Provided**	**Spaces Provided**
Garage Spaces		2.00	566
Driveway Spaces		0.00	*0*
On Site / Guest Spaces		0.27	*77*
Total Residential Parking Provided		2.27	643
Accessible Parking Required		**Ratio Req'd**	**Spaces Req'd**
Resident Open Spaces	77	5%	4

Affordable Site Summary

Gross Site Area	*1.16 Acres*
total Dwelling Units	32 du
Density	27.6 Du/Ac

Affordable Plan Summary

Plan	Beds	Net Unit Area	Quantity	%	Total Net Area	Avg. Unit Size
Affordable - P1	1	469	32		15,008 sf	469 sf

Affordable Open Space Summary

Private Open Space	0 sf	
Common Open Space	*21,000 sf*	
Total Open Space	21,000 sf	656 sf/Unit

Affordable Parking Summary - Carson Standard

Parking Required	Quantity	Ratio Req'd	Spaces Req'd
Studio & 1 Bed	32	*.50 Spaces/Unit*	16
Parking Provided		**Ratio Provided**	**Spaces Provided**
Open Parking Spaces		0.50	*16*
Accessible Parking Required		**Ratio Req'd**	**Spaces Req'd**
Resident Open Spaces	16	5%	1

Source: ktgy Architecture; 21140 Avalon Blvd, LLC

CARSON KOTT SITE
CARSON, CA #2023-1022

CONCEPTUAL DESIGN
SEPTEMBER 4, 2024

Figure 1
Site Plan