PUBLIC REVIEW DRAFT | MAY 2023

FIGUEROA STREET BUSINESS PARK PROJECT

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

PREPARED FOR

CITY OF CARSON

PREPARED BY

Michael Baker INTERNATIONAL

PUBLIC REVIEW DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Figueroa Street Business Park Project

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JN 184706

This document is designed for double-sided printing to conserve natural resources.

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1.0 INTRODUCTION

The Figueroa Street Business Park Project (herein referenced as the "project") is located at 20601 South Main Street, approximately 600 feet southeast of the Del Amo Boulevard and Figueroa Street intersection (Assessor's Parcel Number [APN] 7336-003-043) in the City of Carson (City), California. The proposed project consists of the remediation of the former landfill and development of a business park campus in accordance with the proposed Figueroa Street Business Park Specific Plan (Specific Plan). The Specific Plan includes two planning areas that encompass the 14.42-acre site: Planning Area 1, which would accommodate business park uses and Planning Area 2 which would accommodate general commercial/retail uses. Planning Area 1 would allow development of up to three structures (proposed Buildings 1 through 3) totaling 309,266 square feet of building area. Planning Area 2 would consist of a single 4,000 square foot structure (Building 4). The project also proposes on-site surface parking and landscaping associated with the new business park development; refer to Section 2.0, *Project Description*. Following a preliminary review of the proposed project, the City has determined that the project 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 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. It should be noted that the City adopted an update to the General Plan on April 4, 2023, after this environmental document had been prepared but prior to its release.
- *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 the 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. It is acknowledged that the General Plan EIR was recirculated to provide additional information regarding potential impacts associated with a revised Land Use Plan considered as part of the proposed General Plan. This recirculated document was incorporated into the Final General Plan EIR.
- *Carson Municipal Code* (current through Ordinance No. 22-2219, passed October 18, 2022). 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.

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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 (County), 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 Torrance is located to the west; the City of Compton is located to the northeast; and the City of Long Beach is located to the east. Unincorporated portions of the County are also located to the northwest.

The proposed 14.42-acre Figueroa Street Business Park Project (project) site is located approximately 600 feet southeast of the Del Amo Boulevard/Figueroa Street intersection, at 20601 South Main Street (Assessor's Parcel Number [APN] 7336-003-043); refer to Exhibit 2-2, *Site Vicinity*. Regional access to the site is provided via the Harbor Freeway (Interstate 110 [I-110]) and San Diego Freeway (Interstate 405 [I-405]). Local access to the site is provided via South Main Street and Figueroa Street.

2.2 ENVIRONMENTAL SETTING

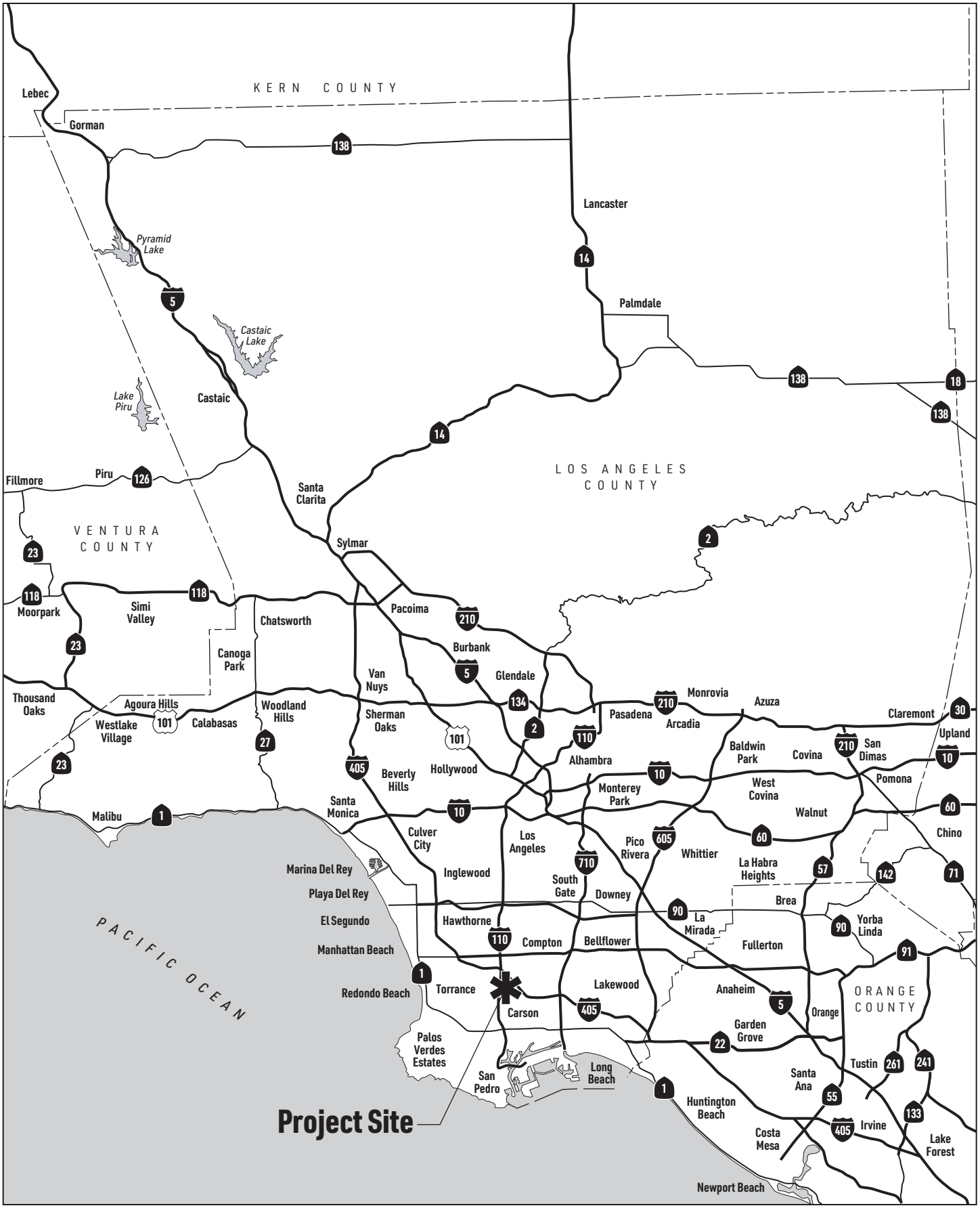
The project site is currently vacant, disturbed land (formerly part of the Gardena Valley Landfill No. 1 & 2, a Class II landfill). Site access is provided via two driveways along South Main Street and Figueroa Street.

On-site topography ranges from 20 to 30 feet above mean sea level (amsl), raised in the center and gently sloped to the west. A three-foot grade differentiation is present across the entire site. The limited vegetation on-site consists of palm trees and low-lying shrubs and grasses along the northern and southern portions of the project site.

GENERAL PLAN LAND USE DESIGNATION AND ZONING

The City adopted an update to the *Carson General Plan* (General Plan) on April 4, 2023, after this environmental document had been prepared but prior to its release. Based on the previous General Plan *Land Use Map*, adopted December 18, 2007, the project site was designated Mixed Use, Business Park (MU-BP). The MU-BP designation allowed for commercial and business park/limited industrial uses. No residential uses were allowed. The updated General Plan (Carson 2040 General Plan) *Land Use Map* revised the project site designation to Flex District (FLX). The FLX designation permits a wide range of uses including offices, research and development, limited light-industrial uses, hotels, local and regional retail commercial uses, commercial entertainment uses, and gas/charging stations in mid- and high-intensity settings, as well as residential uses in designated locations not including the project site. Under the FLX designation, warehousing/distribution/logistics facilities larger than 30,000 square feet are only permitted on the project site with approval of a development agreement. For the purposes of this environmental document, the prior land use designation of MU-BP is analyzed throughout. However, the proposed Figueroa Street Business Park Specific Plan, which would apply to the zoning for the project site, has been prepared to be consistent with the new FLX land use designation.

Based on the *City of Carson Zoning Map*, the project site is zoned Manufacturing Light with Organic Refuse Landfill Overlay and Design Review Overlay (ML-ORL-D). The ML zone is created primarily for small and medium size industrial uses, which are not likely to have adverse effects upon each other or upon neighboring residential and commercial zones.



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Regional Vicinity

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Exhibit 2-1

Source: Google Earth Pro, September 2021

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FIGUEROA STREET BUSINESS PARK PROJECT
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Site Vicinity

Exhibit 2-2

SURROUNDING LAND USES

Surrounding land uses include a mixture of commercial, light industrial and residential uses. Specifically, land uses surrounding the project site include:

- *North:* The Los Angeles County Flood Control Torrance Lateral adjoins the project site to the north. North of the flood control lateral are a mixture of uses including public storage and landscape nurseries. The General Plan designation for these uses is MU-BP (Mixed Use Business Park) and zoning is ML-ORL-D (Manufacturing, Light - Organic Refuse Landfill - Design Overlay).
- *East:* South Main Street adjoins the project site to the east. Uses east of South Main Street include the Vista del Loma mobile home park, residential, and commercial uses along South Main Street, and the yet developed District at South Bay. The General Plan designations for these areas are LD (Low Density), LI (Light Industrial), and MU-R (Mixed Use – Residential) respectively. The zoning is RM-8-D (Residential, Multi Dwelling, up to 8 units per acre with Design Overlay, ML-D (Manufacturing Light, Design Overlay), and Residential, Multi-Family, up to 8 Units per Acre with D Overlay (RMF-D), and the District at South Bay Specific Plan.
- *South:* Institutional (i.e., Mission Ebenezer Family Church, Faith in Christ Church, Glory Christian Fellowship, and International Institute), office, light industrial and retail uses are located to the south of the project site. The General Plan designations for these areas are MU-BP (Mixed Use, Business Park), LI (Light Industrial) and GC (General Commercial) and zoned ML-ORL-D (Manufacturing, Light - Organic Refuse Landfill - Design Overlay), ML-D, and CG-ORL-D (Commercial General with Organic Refuse Landfill - Design Overlay).
- *West:* Figueroa Street adjoins the project site to the west. West of Figueroa Street is Interstate 110.

2.3 BACKGROUND AND HISTORY

Although the project site currently consists of vacant, disturbed land, the project site was formerly part of the Gardena Valley Landfill No. 1 & 2, historically Class II landfill. The Gardena Valley Landfill No. 1 & 2 was utilized from November 1956 until approximately October 1959 and allowed municipal and industrial wastes including crude oil-related wastes (crude oil and tank bottoms), paint sludge, auto wash sludge, latex, molasses, cutting oil, and other semi-liquids. The average thickness of the waste materials was found to be approximately 25 feet[1] and the landfill deposits extend to depths of approximately 35 feet[2] below existing grades. Approximately 75 percent of accepted waste was residential refuse and 25 percent was other waste including liquid industrial waste. The former landfill was capped with approximately five feet of soil and ceased operation shortly thereafter. Since then, the site has remained unused. The proposed site remediation is discussed below in Section 2.4.1.

2.4 PROJECT CHARACTERISTICS

2.4.1 SITE REMEDIATION

The project site was formerly part of the Gardena Valley 1 & 2 Landfill (landfill) and, based on to the minimal impacts to soil underlying the landfill waste, hydrogeologic investigation delays, and the need to address gas migration and the infiltration of water into the landfill, the Department of Toxic Substances Control (DTSC) historically divided the former landfill into two separate operable units (OU); the Wastefill and Groundwater OUs. In support of an expedited redevelopment plan, the Supplemental Site Investigation (SSI) that was conducted in 2021 and subsequent Draft

[1] Haley & Aldrich, Inc., *ASTM Phase I Environmental Site Assessment, Gardena Valley 1 & 2 Landfill, Carson, California*, February 2021.
[2] TGR Geotechnical, Inc., *20-7176 Geotechnical Investigation Report, Figueroa Street Business Park*, February 18, 2021.

Response Plan, dated April 11, 2023, by Haley & Aldrich, Inc. (Haley & Aldrich), focus on the Wastefill OU. Refer to Exhibit 2.3a, *Site Remediation - Wastefill Operable Unit*, for the limits of the Wastefill OU. Future remedial action on the Groundwater OU would be coordinated with DTSC and would likely be initiated with a monitoring program.

The Draft Response Plan was prepared on behalf of the current property owner, Carson Main Street, LLC, by Haley & Aldrich for the purpose of:

- Defining contaminants of concern on-site;
- Establishing remedial action objectives for protection of human health and the environment;
- Identifying and evaluating remedial alternatives;
- Recommending a selected remedial alternative; and
- Providing details for how the selected alternative will be implemented.

The Draft Response Plan is currently undergoing DTSC review. The Draft Response Plan describes various actions to remediate the project site and provides a number of alternatives to accomplish the remedial action objectives including, institutional and engineering controls, prescriptive and alternative landfill covers, and a landfill gas control system.

The Draft Response Plan determined that proposed Alternative 3, Limited Soil Excavation, Engineered Landfill Cap, Soil Management Plan (SMP), Building Protective Systems, Hardscape Venting System, Landfill Gas Monitoring, and Land Use Covenant for the site was the preferred Alternative for remediation. This alternative addresses potential risks associated with the proposed future redevelopment of the site. Each of these elements is described below.

- Limited Soil Excavation: When the former landfill was closed in 1969 it was capped with approximately five feet of soil. Within the cover soil, elevated arsenic concentrations were identified during the SSI investigation and delineated during subsequent step-out sampling. The soils with elevated arsenic would be removed using limited excavation totaling approximately 12 cubic yards. The planned maximum excavation depth is approximately six feet below ground surface (bgs); however, the actual excavation depths would be determined in the field based on the depth to waste material, observations of potential chemical impacts (i.e., stained, discolored, wet, or saturated soil, odors in ambient air, elevated air quality readings), and potentially confirmatory soil sampling. Excavations are planned to be completed within the soil cover material without extending into the waste material. A soil cover would be maintained during the excavation to prevent uncontrolled landfill gas surface emissions and the creation of other nuisances such as dust, litter, vectors, and odors. Once the excavation activities have been completed, a Removal Action Completion Report (RACR) would be prepared and submitted to the DTSC, including the field observations, documentation, and the results of the confirmatory soil sampling.

- Engineered Landfill Cap: An engineered landfill cap would be installed consisting of different integrated elements: hardscape, landscape and building foundations with building protective systems; refer to Exhibit 2-3b, *Site Remediation - Engineered Landfill Cap*. The engineered landfill cap would include a compacted foundation layer constructed from the existing landfill cover material that is a minimum of 22-inches thick. In addition, the exterior hardscape and landscape elements of the engineered landfill cap would include an erosion-resistant protective layer, low-permeable barrier layer, and a sub-grade passive landfill gas venting system. The buildings would be slab-on-grade with foundations that allow for a minimum 22-inch foundation cover soil. Buildings would also include building protective systems, as described below.

Source: Haley Aldrich, February 2023

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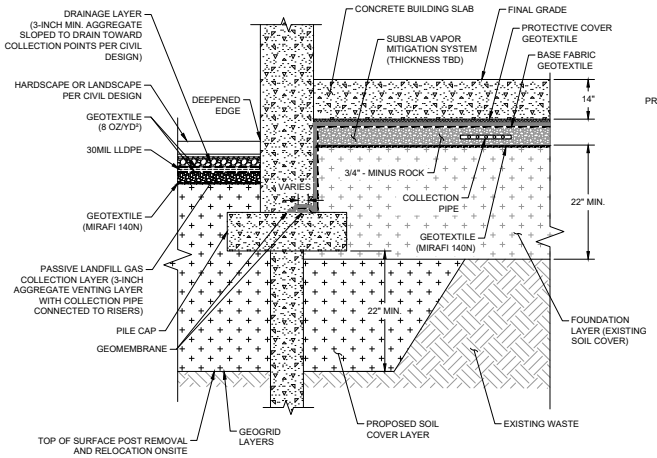
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Site Remediation – Wastefill OU

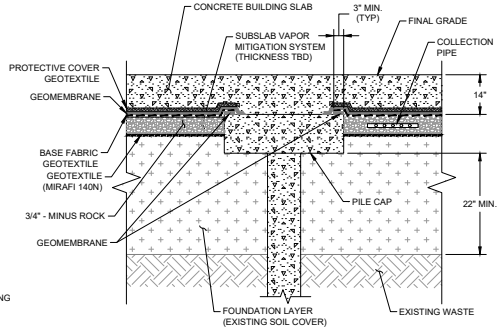
Exhibit 2-3a



NOTES:

1. BASE FABRIC GEOTEXTILE TO PROTECT AGAINST DIFFUSION OF VOCs.
2. SUB-SLAB UTILITIES TO BE SUPPORTED.
3. VAPOR CONTROL BARRIER TO REMAIN FUNCTIONAL WITH UP TO 9-INCHES OF DIFFERENTIAL SETTLEMENT.
4. COLLECTION PIPE SHALL HAVE A MINIMUM OF 1-INCH OF COVERAGE.

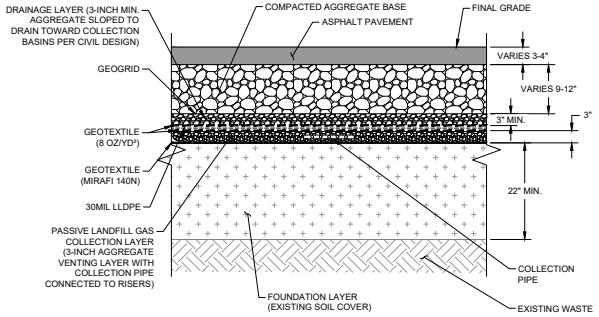
1 SLAB SECTION WITH DEEPENED EDGE, TYP.
SCALE: NOT TO SCALE



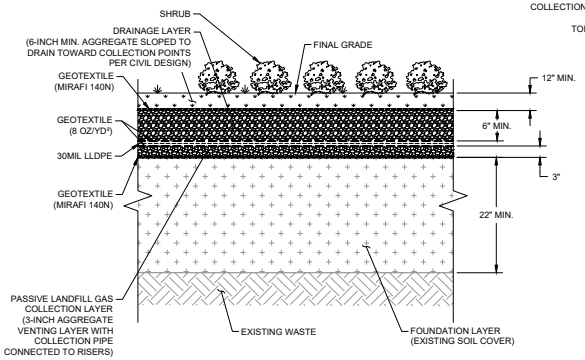
NOTES:

1. BASE FABRIC GEOTEXTILE TO PROTECT AGAINST DIFFUSION OF VOCs.
2. COLLECTION PIPE SHALL HAVE A MINIMUM OF 1-INCH OF COVERAGE.

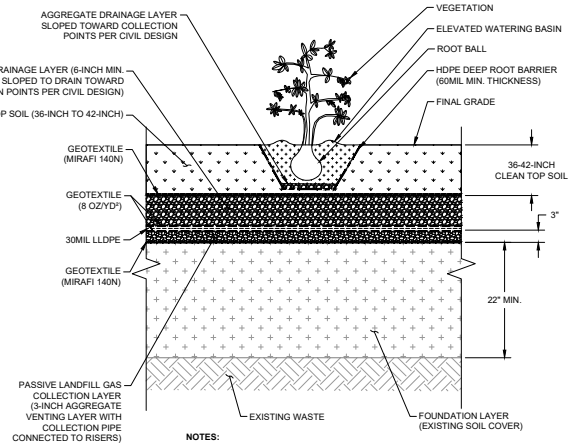
2 INTERIOR SLAB SECTION AT PILES, TYP.
SCALE: NOT TO SCALE



3 ASPHALT PAVEMENT SECTION, TYP.
SCALE: NOT TO SCALE



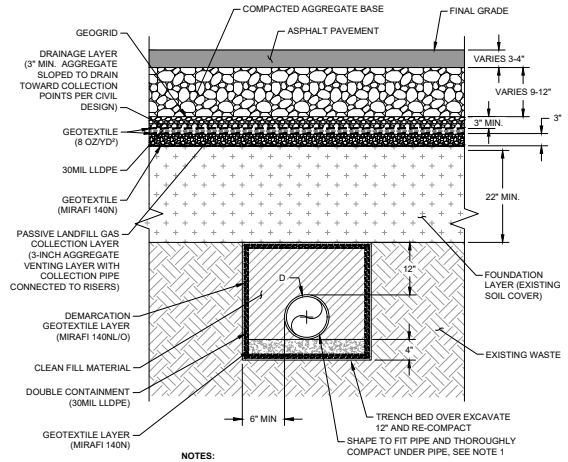
4 VEGETATIVE GROUND COVER SECTION OVER LANDFILL, TYP.
SCALE: NOT TO SCALE



NOTES:

1. TREES WITH SHALLOW ROOT SYSTEMS TO BE SELECTED.
2. TREE WELL TO BE APPROXIMATELY TWO TIMES THE SIZE OF THE ROOT BALL.
3. TREE STAKES SHALL NOT PENETRATE DRAINAGE AND LOW PERMEABLE LAYERS.

5 SHRUB/TREE DETAIL OVER LANDFILL, TYP.
SCALE: NOT TO SCALE



NOTES:

BEDDING: CLEAN COARSE SAND
FILL MATERIAL: CLEAN IMPORTED/NATIVE PROCESSED MATERIAL WITH SAND EQUIVALENT OF AT LEAST 30, 100% PASSING THE 1/4 IN SIEVE, MIN. 90% PASSING THE NO.4 SIEVE AND MAX 10% PASSING THE NO.200 SIEVE

1. EXCAVATE FOR BELLS OR HUBS SO FULL LOAD IS CARRIED BY PIPE BARRELS
2. UTILITY VAPOR CUT-OFF BARRIER TO BE INSTALLED WITHIN UTILITY TRENCHES ADJACENT TO SUBSURFACE FEATURES AND AT 100 FT INTERVALS ALONG THE TRENCH.
3. UTILITY VAPOR CUT-OFF BARRIER TO BE CONSTRUCTED WITH LOW PERMEABLE BACKFILL. SPECIFICATIONS TO BE PROVIDED IN THE VAPOR MITIGATION PLANS.

6 DEEP TRENCH DETAL
SCALE: NOT TO SCALE

Source: Haley Aldrich, May 2022

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Site Remediation – Engineered Landfill Cap

Exhibit 2-3b

- Soil Management Plan: The Draft SMP prepared for the project by Haley & Aldrich, dated April 21, 2023, is under DTSC review. The Draft SMP establishes procedures and guidelines that protect human health and the environment during the disturbance and management of potentially impacted soil and waste material at the site. The Draft SMP includes the identification, sampling, characterization, segregation and stockpiling of contaminated media; decontamination procedures, procedures for the handling, storing, and disposal of contaminated media; and air quality monitoring requirements during grading activities.

- Building Protective Systems: Construction of the four proposed buildings under the project (intended for occupancy) would install building protective systems, including vapor intrusion mitigation systems (VIMS) and methane detection and alarm systems (MDAS). The VIMS system would consist of a sub-slab vapor control barrier, active venting system, conduit seals, trench vapor cut-off barriers and an integrated MDAS that activates the active venting system. The building protective systems would be incorporated into the design of on-site structures to reduce or eliminate the exposure pathway of chemicals of potential concern and alert occupants in the event of a detection.

  The design of the engineered landfill cap and landfill gas mitigation systems would be developed as part of the development plans and would be submitted to applicable agencies (i.e., DTSC, California Department of Resources Recycling and Recovery (CalRecycle), and Los Angeles County Department of Public Works Building and Safety Division) for approval prior to initiation of any ground-disturbing activities.

- Hardscape Venting System: The passive hardscape venting system allows for the natural release of landfill gas via an engineered system of below-grade collection pipe and risers located below the engineered landfill cap. This venting system would reduce the potential for accumulation and migration of landfill gas.

- Landfill Gas Monitoring: A landfill gas monitoring program at the surface and perimeter of the project site would be developed to monitor the performance of the engineering controls. Additionally, monitoring of the indoor air of any buildings on the project site would occur to ensure compliance with County of Los Angeles requirements.

- Land Use Covenant: Implementation of institutional controls, including land use covenants and/or deed restrictions to manage future use of the project site would be employed. A limitation on future use would not be intended to prevent redevelopment but rather to control and restrict what activities could be applied and any limitations to be imposed. Requirements may include precluding any future use of the project site for residential use or other sensitive uses, prohibiting subsurface disturbance and groundwater use, requiring adherence to OM&M Plan and SMP, and/or requiring mitigation measures in site buildings.

- Engineering Controls: Engineering controls may be implemented such as construction of an access barrier (e.g., chain-link fence or other barrier) along the perimeter of the property to deter trespassing.

Prior to initiating the long-term operation, maintenance, and monitoring (OM&M) activities at the site, a site-wide OM&M Plan covering the engineered soil cover inspections and as-needed maintenance, the VIMS, MDAS, and passive landfill gas venting system OM&M requirements, and the long-term perimeter and landfill surface monitoring guidelines would be prepared and submitted to the DTSC for review and approval. The OM&M Plan would include the post-closure care activities and monitoring requirements, and at minimum, will contain the following components:

- Hazard Analysis and Health Safety Risks;

- Best Management Practices (BMPs);

- Emergency Response Plans;

- Soil Cover Inspections, Maintenance, and Repair Requirements;
- VIMS, MDAS, and Passive Landfill Gas Venting System Operational Procedures, Inspections, and As-Needed Long-Term Monitoring, Maintenance, and Repair Requirements;
- Landfill Perimeter Monitoring Guidelines;
- Landfill Surface Monitoring Guidelines;
- Excavation and Soil Management Guidelines for Potential Future Site Modifications and/or Site Maintenance/Repairs Related Activities; and
- Reporting and Notifications Requirements.

OM&M activities would be the responsibility of the site owner and governed by an OM&M Agreement with DTSC.

2.4.2 PROPOSED PROJECT

The project consists of the development of a business park campus with facilities that can accommodate a range of uses that include offices, research and development, e-commerce and light industrial uses in three structures totaling approximately 309,266-square feet and one general commercial/retail structure totaling approximately 4,000-square feet (all four structures would include a total building area of 313,266-square feet) in accordance with the proposed Figueroa Street Business Park Specific Plan (Specific Plan); refer to Exhibit 2-4, *Conceptual Site Plan* and Appendix A, *Figueroa Street Business Park Specific Plan*. Refer to Table 2-3, *Permitted Uses*, for a complete list of permitted uses.

FIGUEROA STREET BUSINESS PARK SPECIFIC PLAN

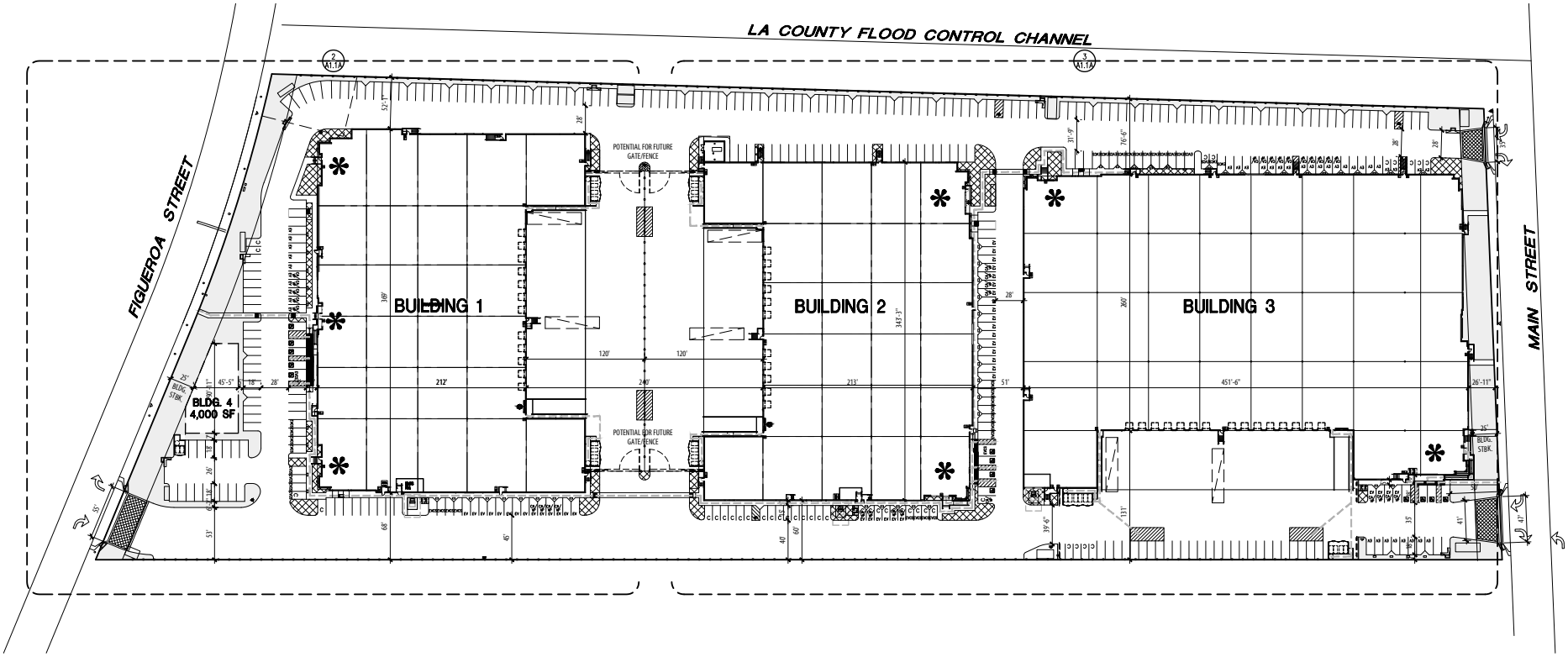
The proposed Specific Plan is intended to provide an orderly and efficient development of the Specific Plan area (the project site), in accordance with the provisions of the General Plan. The Specific Plan would serve both planning and regulatory functions including land use regulations, circulation pattern, public services and infrastructure, and development standards and urban design. All future development within the Specific Plan would be subject to compliance with the Specific Plan regulations, as well as other applicable City regulations; refer to Appendix A.

Land Use Plan

The Specific Plan includes two planning areas that encompass the 14.42-acre site: Planning Area 1 (E-Commerce/Business Park/Industrial uses) and Planning Area 2 (Commercial uses); refer to Table 2-1, *Land Use Summary*.

Table 2-1
Land Use Summary

Planning Area	Land Use	Size (acre)	Building Area (square feet)	Floor Area Ration (FAR)
Planning Area 1	Business Park	14.18	309,266	0.50[1]
Planning Area 2	General Commercial/Retail	0.24	4,000	0.40
TOTAL		**14.42**	**313,266**	**0.50**[1]
Note: [1] FAR of 0.5 is permitted with a City-approved development agreement and community benefits package.				



Source: GAA Architects, November 2022

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FIGUEROA STREET BUSINESS PARK PROJECT
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Conceptual Site Plan

Exhibit 2-4

Planning Area 1 would allow development of up to three structures (proposed Buildings 1 through 3). Building 1 would be approximately 91,570 square feet and would be situated in the western portion of the project site; Building 2 would encompass a similar but slightly smaller (85,896 square feet) mirrored layout of Building 1; and Building 3 would feature the largest building area (131,800 square feet). Refer to Table 2-2, *Proposed Building Area*. Each building would include office space (Building 1: 15,000 square feet, Building 2: 15,300 square feet, and Building 3: 19,500 square feet). Manufacturing (Building 1: 8,557 square feet; Building 2: 7,990 square feet; and Building 3: 12,580 square feet) and general warehouse areas (Building 1: 68,013 square feet; Building 2: 62,606 square feet; and Building 3: 99,720 square feet) would encompass the majority of the total building area. An electrical room and bicycle storage rack would also be included adjacent to each of the ground floor warehouse offices of each building. Several sectional dock high doors and section grade doors would be located on the exterior of each building with concrete stairs and handrails. Additionally, two six-foot trash enclosures would be provided for each building.

Planning Area 2 would consist of a single 4,000-square foot commercial structure (Building 4) in the southwestern portion of the project site along Figueroa Street. Building 4 would be dedicated to general commercial/retail uses; refer to Table 2-2.

Table 2-2
Proposed Building Area

Building Area	Building 1 (square feet)	Building 2 (square feet)	Building 3 (square feet)	Building 4 (square feet)	Total Building Area (square feet)
Office	15,000	15,300	19,500	--	49,800
Manufacturing	8,557	7,990	12,580	--	29,127
Warehouse	68,013	62,606	99,720	--	230,339
Office/Retail	--	--	--	4,000	4,000
TOTAL BUILDING AREA	**91,570**	**85,896**	**131,800**	**4,000**	**313,266**

Anticipated tenants of the proposed business park are currently unknown; however, future tenants may include light industrial manufacturing uses; research and development; warehousing; and distribution ancillary to office, showroom, and manufacturing uses. Commercial users would be flexible and could contain office or retail commercial uses. All future uses of the on-site structures would be required to comply with permitted uses detailed in the Specific Plan; refer to Table 2-3, *Permitted Uses*.

Development Regulations

The Development Regulations are intended to provide regulations for all land uses within the Specific Plan area. These include standards regarding permitted uses, building height limits, parking requirements, and setbacks, as well as general provisions applicable to all uses.

Table 2-3
Permitted Uses

SPECIFIC PLAN – PERMITTED USES
Permitted By-Right
Fulfillment, Assembly, and Processing
Small-scale E-commerce direct to consumer and tax generating, small-scale warehousing, distribution facilities, logistic facilities, fulfillment facilities, parcel delivery, freight, and last mile facilities
Equipment Rentals and Sales, interior and/or approved screened yard
Manufacturing, light (assembly, processing, and distribution)
Laundry and garment cleaning services
Retail/wholesale
Partial climate controlled
Research and Development
Research and Development
Business Park
Civic/Institutional/Educational
Data Center
Offices, including professional, medical, financial, administrative, public service and general business offices and accessory uses
Entertainment
Broadcasting and Publishing Uses
Entertainment and Motion Picture Production
Museum and museum support uses
Music/Sound Production Studios
Recreational or Professional – gyms, dance studio, group training facilities (requires parking analysis)
Agriculture
Indoor farming/agriculture
Commercial
Animal hospital or clinic
Animal services (dog clip and wash, veterinary office or clinic)
Automobile charging station
Automobile sales without outdoor display
Community center, lodge hall, private club
Copying, printing, blueprinting, silk screening, photography, picture framing
Food catering (only direct retail sales or retail distribution)
Food store – grocery, fish, meat, fruits and vegetables, retail bakery, pastry, candy, health food, take-out food
Graphic arts services
Gymnasium, indoor athletic facility – subject to submitting a parking study for review and obtaining approval by the Director or their designee
Medical or dental office or clinic, public health center
Optical services
Parcel delivery service
Pharmacy
Physical training school – gymnastics, martial arts – subject to submitting a parking study for review and obtaining approval by the Director or their designee
Post office
Professional Offices (Business professional, financial, insurance, real estate, utility payments, telegraph, telephone answering service, messenger service, advertising, newspaper or publishing [no printing], ticket agency, travel agency, employment agency, collection agency, detective agency, security service, bail bondsman, check cashing)
Professional Studio (Costume design, interior decoration, photography, writing, drama, dance, music, arts and crafts

SPECIFIC PLAN – PERMITTED USES
including stained glass) – subject to submitting a parking study for review and obtaining approval by the Director or their designee
Radio, television, recording
Restaurant, casual/fast food, take-out only
Restaurant, dine-in – subject to submitting a parking study for review and obtaining approval by the Director or their designee
Director Approval Required
Any use that meets the purpose and intent of the Specific Plan and/or General Plan does not significantly expand environmental or social impacts. Such determination will be based upon the prospective use's substantial conformance with the environmental compliance, economic benefits to the City and the ability of the City's infrastructure to accommodate. Potential example mitigation support could include a letter from a licensed traffic engineer indicating no significant traffic impact, or a letter from financial/planning consultant indicating no significant economic detriment to the city/infrastructure. Any use that is not expressly permitted.
Conditional Use Permit Required
Alcohol beverage sales
Communications facilities
Hazardous materials generating uses below the California Accidental Release Prevention (CalArp) thresholds and other hazardous materials - subject to compliance with the City's Hazardous Materials Ordinance No. 21-2120, which regulates new and existing industrial land uses involving CalARP Regulated Substances and Hazardous Materials (as such terms are defined in the ordinance) in the City's Industrial Zones.
Temporary Uses
Christmas tree sales, pumpkin sales
Prohibited Uses
Check Cashing
Dismantling or salvage processing of vehicles, boats, large equipment or machinery
Outdoor storage of cargo containers, trucks, trailers, boats, aircraft or heavy equipment
Recycling facility
Salvage yards
Self-Storage
Service and repair of vehicles, boats, large equipment or machinery
Storage, manufacturing, or handling of hazardous materials in excess of CalArp thresholds and not in compliance with the Hazardous Materials Ordinance No. 21-2120
Storage, manufacturing, and handling of poisons, explosives, organic peroxides
Any uses not expressly listed shall be as permitted by the findings and determination of the Community Development Director or their designee

Industrial/Business Park Uses: The Specific Plan proposes development standards for E-Commerce/Business Park/Industrial uses, primarily intended for industrial buildings within Planning Area 1 (Buildings 1 through 3); refer to Table 2-4, *Development Standards: Industrial (Planning Area 1)*.

Table 2-4
Development Standards: Business Park (Planning Area 1)

Item	Standard
Floor Area Ratio (Maximum)	0.4[1, 3, 4]
Front Yard Setback (at Figueroa and South Main Street)	20 feet
Side Yard Setback	0 feet (when adjacent to non-residential uses)
Rear Yard Setback	0 feet (when adjacent to non-residential uses)
Space between Buildings	3 feet[1]
Site Landscaping[5]	5 percent
Building Height	No Maximum Building Height[2]

Notes:
[1] Where there is a separation and both buildings are more than 50 feet in height, the required separation shall be increased by one foot for each two feet of height above 50 feet on the lower building.
[2] No height limit provided additional yard spaces are provided as required in this table.
[3] FAR shall be calculated across the entire Specific Plan area. FAR shall not include mechanical mezzanines.
[4] 0.4 FAR restriction under the FLX General Plan Land Use District (before Development Agreement/community benefits).
[5] Site landscaping is calculated across the entire planning area using all landscaped areas within the planning area boundary.
Source: City of Carson, Figueroa Street Business Park Specific Plan Draft, April 2023.

Commercial Uses: The Specific Plan proposes development standards for commercial uses, primarily intended for smaller-scale general commercial uses in Planning Area 2 (Building 4); refer to Table 2-5, *Development Standards: Commercial (Planning Area 2)*.

Table 2-5
Development Standards: Commercial (Planning Area 2)

Item	Parking Ratio
Floor Area Ratio (Maximum)	0.4[1, 2]
Front Yard Setback (at Figueroa)	20 feet
Side Yard Setback	0 feet (when adjacent to non-residential uses)
Rear Yard Setback	0 feet (when adjacent to non-residential uses)
Space between Buildings	6 feet
Building Height	30 feet

Notes:
[1] FAR shall be calculated across the entire Specific Plan area. FAR shall not include mechanical mezzanines.
[2] 0.4 FAR restriction under the FLX General Plan Land Use District (before Development Agreement/community benefits).
Source: City of Carson, Figueroa Street Business Park Specific Plan Draft, April 2023.

Parking: The Specific Plan proposes parking standard ratios shown in Table 2-6, *Parking*. A total of 399 surface parking spaces are proposed on-site for employees and visitors, including 24 Americans with Disabilities Act (ADA)-compliant spaces (two of which are electric vehicle charging stations) and 98 electric vehicle/clean air/van pool spaces (53 of which are electric vehicle charging stations). On-site parking would be provided along building perimeters; Building 1 would have parking along its western and southern perimeter; Building 2 along its northern, eastern, and southern perimeter; Building 3 along the northern and southern perimeter; and Building 4 along the eastern and southern perimeter. Parking is also provided along the northern, southeastern, and western perimeters of the project site. Shared parking is permitted across the Specific Plan area. A total of 38 truck loading docks (12 loading docks for Building 1, 11 loading docks for Building 2, and 15 loading docks for Building 3), three grade doors

(one grade door for each building [Buildings 1-3]), and six trailer stalls (two trailer stalls for each building [Buildings 1-3]) are proposed on-site. A total of 10 bicycle racks are also proposed on-site.

Table 2-6
Parking

Item	Proposed Specific Plan Parking Standards	Proposed Site Plan		
	Parking Ratio	Proposed Square Footage/Parking Spaces	Parking Required	Parking Proposed
Planning Area 1				
Business Park				
Warehouse Use	1 space per 1,500 square feet	Building 1: 68,013 Building 2: 62,606 Building 3: 99,720	46 42 67 *(TOTAL: 155)*	
Manufacturing Use	1 space per 500 square feet	Building 1: 8,557 Building 2: 7,990 Building 3: 12,580	18 16 26 *(TOTAL: 60)*	
Office Use	1 space per 300 square feet	Building 1: 15,000 Building 2: 15,300 Building 3: 19,500	50 51 65 *(TOTAL: 166)*	
Subtotal Vehicle Parking Spaces		*309,266 square feet*	*381 required parking spaces*	*384 proposed parking spaces*
Bicycle Parking	Per CalGreen (5% of total parking)	384 required parking spaces	20	22 (based on CalGreen Section 5.106.5.1)
Carpool Stalls	Per Los Angeles County Code (8% of total parking)	384 required parking spaces	31	30
EV Compatible Stalls	Per Los Angeles County Code (30% of total parking)	384 required parking spaces	115	115
EV Charging Stations	Per Los Angeles County Code (33% of EV Compatible Stalls)	115 required EV compatible stalls	38	38
Planning Area 2				
Office/Ancillary Retail	1 space per 300 square feet	4,000	14	15
Subtotal Vehicle Parking Spaces		*4,000 square feet*	*14 required parking spaces*	*15 proposed parking spaces*
Bicycle Parking	Per CalGreen (5% of total parking)	14 required parking spaces	2	2
Carpool Stalls	Per Los Angeles County Code (8% of total parking)	14 required parking spaces	1	1
EV Compatible Stalls	Per Los Angeles County Code (30% of total parking)	14 required parking spaces	4	5
EV Charging Stations	Per Los Angeles County Code (33% of EV Compatible Stalls)	4 required EV compatible stalls	1	2
Total Vehicle Parking Spaces		*313,266 square feet*	*395 required parking spaces*	*399 proposed parking spaces*

Notes: CalGreen = California Green Building Standards Code; CBC/CMC = California Building Code/California Mechanical Code

Source: *California Green Building Standards Code*, Sections 5.106.4 - 5.106.5.3.3.

PROPOSED SITE PLAN

As part of the proposed project application, the Applicant is seeking approval of a site plan, consistent with the proposed Specific Plan, which would be reviewed and approved by the City of Carson Planning Commission. The proposed site plan characteristics are described in detail below.

Architectural Characteristics

The proposed Business Park buildings would have a maximum building height of 48 feet and the proposed Commercial use building would have a maximum height of 30 feet. The buildings would be constructed of concrete tilt-up panels. The building's exterior color palette is proposed in various shades of white and grey, and would be constructed with blue glazed windows, aluminum canopies, and aluminum mullions. The proposed project would have a front yard setback at Figueroa Street and South Main Street of approximately 25 feet; side setbacks along the northern and southern perimeter of approximately 10 feet; and no rear setback. Heating, ventilation, and air conditioning (HVAC) equipment and exhaust fans would be roof-mounted and screened from public view with parapets.

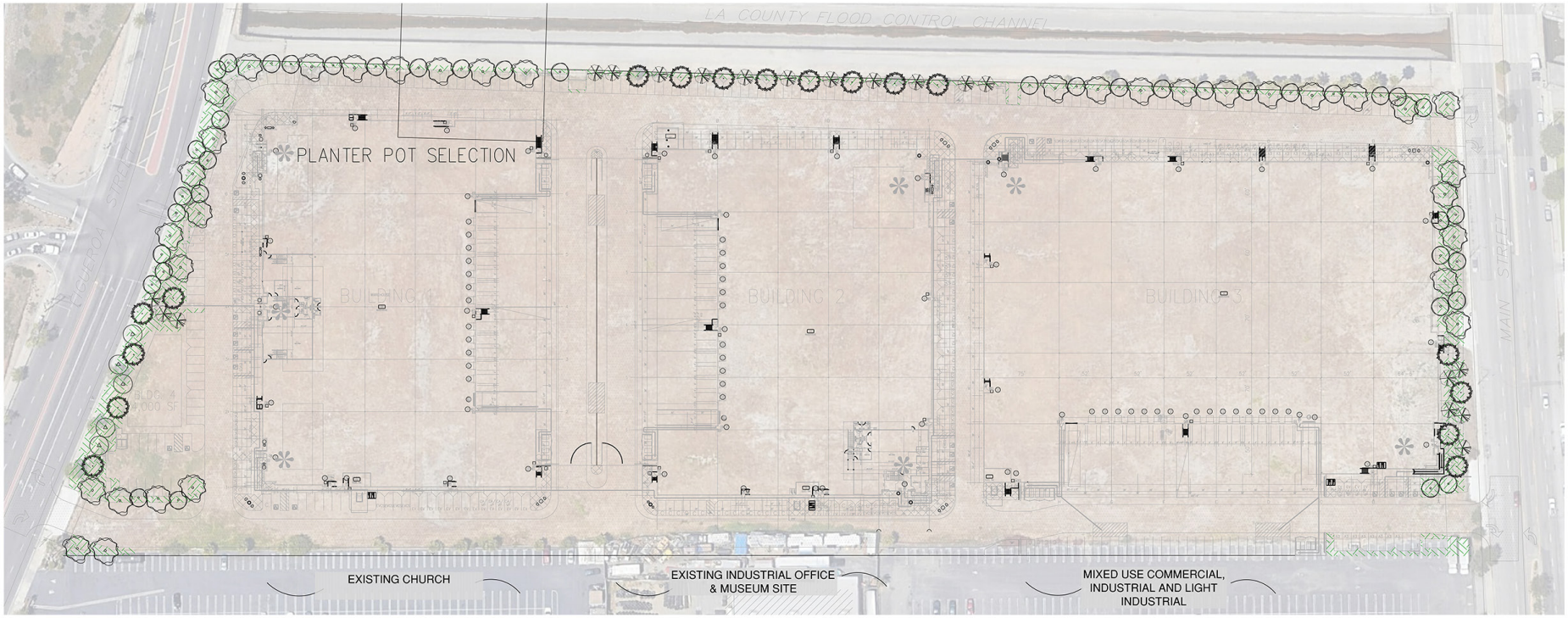
It is acknowledged that the proposed Specific Plan includes urban design guidelines regarding architecture and landscaping. Architectural guidelines are intended to provide a basis for decisions regarding the built environment by promoting a high-quality industrial project. Additionally, these guidelines would include direct guidance on architectural design and details, building mass and scale, materials and exterior colors, and articulation. Landscape guidelines provide direction regarding the use of plant materials that are water-wise and complement the desired architectural design. Development regulations and urban design guidelines are implemented in conjunction to promote unity/cohesive design, enhance the project's identity, and ensure excellence in design during project development, adhering to Citywide design standards and regulations. The proposed site plan design review would be subject to these urban design guidelines.

Landscape Design

The proposed project would provide landscaping improvements, including a variety of ornamental trees, shrubs, and ground cover; refer to Exhibit 2-5, *Conceptual Landscape Plan*. The street frontage along Figueroa Street and South Main Street, and the northern perimeter of the site may be planted with eastern redbud trees, bronze loquat trees, Australian willow, crape myrtle trees, and fruitless olive trees, as well as a variety of drought tolerant ground cover and shrub masses (e.g., John Dourley manzanita, blue grama grass, Rosenka bougainvillea, sage-leaf rock rose, Spanish lavender, green cloud Texas ranger, deer grass, feathery cassia, smokey coast rosemary, and colorguard yucca). Planter pots ranging in plant variety, such as dragons blood trees, trailing rosemary, beaked yucca, donkey tail, little ollie, raspberry ice bougainvillea, New Zealand flax, trailing gazania, bitter aloe, and foxtail agave are proposed on-site. Additionally, the Figueroa Street and South Main Street driveways would be improved with enhanced paving, saw-cut score lines, and grind pattern infield with sand blast finish. Overall, proposed landscaping would total approximately 29,705 square feet, or approximately 11 percent of the total site area. The proposed landscaping would also be subject to the Specific Plan urban design guidelines.

Fences and Walls

The proposed project would install a maximum eight-foot-tall wrought iron security fence along the northern and southern boundaries. Concrete masonry retaining walls would be located at the southern property boundary with various heights not exceeding eight-feet. Proposed future seven-foot-tall manual sliding tube steel truck gates and eight-foot tall wrought iron fences would be located between Buildings 1 and 2, as well as south of Building 3. All gates would be equipped with Knox boxes for emergency access.



California Water Efficient Landscape Worksheet

Reference Evapotranspiration (ET_o)		39.0		Project Type	Non-Residential		0.45
Hydrozone # / Planting Description*	Plant Factor (PF)	Irrigation Method*	Irrigation Efficiency (IE)	ETAF (PF/IE)	Landscape Area (sq. Ft.)	ETAF x Area	Estimated Total Water Use (ETWU)*
Regular Landscape Areas							
Low	0.3	Drip	0.81	0.37	29705	11002	170800
		Drip	0.81	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
			0.75	0.00		0	0
				Totals:	29705	11002	170800
Special Landscape Areas							
	[redacted]			1		0	0
				1		0	0
				1		0	0
				1		0	0
				Totals:	0	0	0
						ETWU Total	170800
				Maximum Allowed Water Allowance (MAWA)			329021

ETAF Calculations

Regular Landscape Areas	
Total ETAF x Area	11002
Total Area	29705
Average ETAF	0.37

All Landscape Areas	
Total ETAF x Area	11002
Total Area	29705
Average ETAF	0.37

Average ETAF for Regular Landscape Areas must be 0.55 or below for residential areas, and 0.45 or below for non-residential areas.

PLANT LEGEND (WUCOLS REGION 3- SOUTH COASTAL)

SYMBOL	ABBREVIATION	BOTANICAL NAME	COMMON NAME	SIZE	WATER NEEDS
	TREES				
	CER_CAN	Cercis canadensis 'Forest Pansy'	Eastern Redbud, Multi-Trunk	24" BOX	MOD
	ERI_DEF	Eriobotryta deflexa	Bronze Loquat	24" BOX	MOD
	GEI_PAR	Geijera parviflora	Australian Willow	24" BOX	LOW
	LAG_IND	Lagerstroemia indica 'Natchez'	Crape Myrtle	24" BOX	MOD
	OLE_EUR	Olea europaea 'Swan Hill'	Fruitless Olive	24" BOX	LOW
	SHRUBS				
	ARC_JOH	Arctostaphylos 'John Dourley'	John Dourley Manzanita	1 GAL	LOW
	BOU_GRA	Bouteloua gracilis	Blue Grama Grass	5 GAL	LOW
	BOU_ROS	Bougainvillea rosenka	Rosenka Bougainvillea	5 GAL	LOW
	CIS_SAL	Cistus salvifolius	Sage-Leaf Rock Rose	5 GAL	LOW
	LAV_STO	Lavandula stoechas 'Otto Quast'	Spanish Lavender	5 GAL	LOW
	LEU_FRU	Leucophyllum f. 'Green Cloud'	Green Cloud Texas Ranger	5 GAL	LOW
	MUH_CAP	Muhlenbergia rigens	Deer Grass	1 GAL	LOW
	SEN_ART	Senna (Cassia) artimisioides	Feathery Cassia	5 GAL	LOW
	WES_FRU	Westringia fruticosa 'Morning Light'	Smokey Coast Rosemary	5 GAL	LOW
	YUC_COL	Yucca colorguard	Colorguard Yucca	5 GAL	LOW
	PLANTER POTS				
	DRA_DRA	Dracena draco	Dragons Blood Tree	24" BOX	LOW
	ROS_PRO	Rosemarinus prostrata	Trailing Rosemary	5 GAL	LOW
	YUC_ROS	Yucca rostrata	Beaked Yucca	24" BOX	LOW
	SED_MOR	Sedum morganianum	Donkey Tail	5 GAL	LOW
	OLE_EUR	Olea europaea 'Montra'	Little Ollie	15 GAL	LOW
	BOU_ROS	Bougainvillea 'Raspberry Ice'	Raspberry Ice Bougainvillea	5 GAL	LOW
	PHO_TEN	Phormium tenax 'Maori Maiden'	New Zealand Flax	15 GAL	LOW
	GAZ_RIG	Gazania rigens	Trailing Gazania	5 GAL	LOW
	ALO_FER	Aloe ferox	Bitter Aloe	15 GAL	LOW
	AGA_ATT	Agave attenuata	Foxtail Agave	15 GAL	LOW

LANDSCAPE CALCULATION

TOTAL LANDSCAPE AREA PROVIDED: 29,705 SF/0.68 AC

Source: Hirsch & Associates, Inc., March 2023

Michael Baker INTERNATIONAL

NOT TO SCALE

05/2023 JN 184706

FIGUEROA STREET BUSINESS PARK PROJECT
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Conceptual Landscape Plan

Exhibit 2-5

Circulation

The Circulation Plan of the Specific Plan provides standards and guidelines that ensure the safe and efficient movement of people and vehicles into and through the business park, addressing light trucks and passenger vehicles, heavy trucks, public transit, and non-vehicular circulation (pedestrians and bicycles). Site access would be provided via two driveways along South Main Street on the eastern portion of the site and a third driveway along Figueroa Street at the southwestern corner of the site; refer to Exhibit 2-4. The northeastern driveway along South Main Street would serve as a passenger car driveway with right-in, right-out only access. The southeastern driveway along South Main Street would serve as a shared driveway with full access for passenger cars, bobtails, and delivery trucks and right-out only for large-body trucks. The southwestern driveway along Figueroa Street would serve as a shared driveway with right-in, right-out only access.

Internal private drive aisles provide connections from perimeter streets to shared parking areas, truck docks, and building entrances. Drive aisles would have a minimum width of 26 feet subject to approval of a fire access plan by the Fire Department as part of the site plan review.

Infrastructure

The project proposes utility infrastructure improvements and services necessary to serve the project's anticipated development, as follows:

- *Water*: On-site water services are provided by Cal Water Dominguez District. Specifically, water services are provided to the site via an existing 12-inch water main line in Figueroa Street and in South Main Street. The project would install a 6-inch domestic water line from the existing water line in Figueroa Street, just north of the proposed southwestern driveway, which would extend east along the southern boundary of the site, providing domestic water to the site. Fire water service would be provided through a looped system within the on-site private drive aisles, connecting with the existing 12-inch water line in both Figueroa and South Main Streets. The water lines would either be pile supported or designed with sufficient flexibility to accept several feet of differential settlement over a period of time due to the anticipated consolidation and decomposition of the landfill materials.

- *Sewer*: The Los Angeles County Sanitation Districts (LACSD) provides sewer collection services for the site through the South Main Street Relief Trunk Sewer system. The project would construct a new private on-site gravity sewer system consisting of proposed sewer lines within the site's southern drive aisle and connect to the existing 8-inch sewer main in South Main Street. The gravity sewer system would be pile supported due to the anticipated consolidation and decomposition of the landfill materials.

- *Drainage/Grading:* An existing Los Angeles County Flood Control Torrance Lateral and easement are located just north of the project site. A 15-inch reinforced concrete pipe (RCP) is present along the northern edge of the project site, out letting to the flood control lateral. The project proposes to construct a storm drain system and multiple catch basins within the project's drive aisles, which would be pile supported due to the anticipated consolidation and decomposition of the landfill materials. Development of the proposed project would convey stormwater collected in the catch basins to the existing 15-inch RCP. An underground detention system would be utilized to store on-site collected stormwater. From the detention system, the stormwater would flow to the Los Angeles County Flood Control Torrance Lateral north of the project boundary.

  The project is located on the former Gardena Valley Landfill No. 1 & 2. As previously mentioned, the project site is covered with approximately five feet of surficial artificial fill which is underlain by landfill deposits that extend to depths of approximately 35 feet below existing grade. Landfill conditions limit the amount of

excavation for site grading. The project would install retaining walls for each building on-site. A geotechnical investigation review may be warranted if project excavation exceeds the surficial layer of fill.

- *Electric*: The Southern California Edison would provide electric services to the site. The project would install and underground electric lines on-site to connect with existing utility lines in South Main Street, adjacent to the project frontage. The electric lines would either be pile supported or designed with sufficient flexibility to accept several feet of differential settlement over a period of time.

DEVELOPMENT AGREEMENT

Under the FLX land use designation, warehousing/distribution/logistics facilities larger than 30,000 square feet are only permitted on the project site with approval of a development agreement. Similarly, under the FLX land use designation a Floor Area Ratio (FAR) of 0.4 is permitted; however, an increased FAR of 0.5 is also permitted with a City-approved development agreement and community benefits package. As such, a development agreement is required for the proposed business park.

ZONE CHANGE

A zone change is also required as part of the project to rezone the site from ML-ORL-D to Specific Plan No. 25-21 (Figueroa Street Business Park Specific Plan).

2.5 PHASING/CONSTRUCTION

The project would be constructed in a single-phase for a duration of approximately 18 months. Project construction is anticipated to begin in January 2024 and be fully operational by July 2025. Remediation consists of limited soil excavation (approximately 12 cubic yards) and grading, and installation of the landfill cap and landfill gas mitigation systems. Construction associated with the development of the proposed project would include grading, building construction, paving, and architectural coating. The proposed earthwork for the project would involve approximately 29,000 cubic yards of cut and approximately 11,000 cubic yards of fill and thus, would require 18,000 cubic yards of export of material (the project would include a total of 18,012 cubic yards of export material, including the approximately 12 cubic yards of soil excavation conducted as part of the remediation activities and 18,000 cubic yards of soil excavation conducted as part of the proposed development). All earthwork would be conducted in accordance with a DTSC approved SMP.

Since construction would occur on a former landfill site, the project proposes driven pile foundations to support the structures and floor slabs, pending regulatory approval. Conceptually, the 16-inch and 18-inch concrete driven piles shall be founded in the underlying natural alluvial soils below the landfill and be a minimum of 60 feet deep below existing ground surface. Flatwork such as hardscape slabs and sidewalks may be founded on the surficial 6- to 7-foot-thick fill layer overlying the landfill material, but consideration would be given to supporting sidewalks immediately adjacent to the buildings as structural slabs supported on the building edge and “hinged” to allow settlement of the outer edge away from the building. For concrete paving, hinged approach aprons/ramps would be provided at loading docks, designed to accommodate future differential settlement of the surrounding ground relative to the pile supported structures, over areas of landfill.

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 Approval;
- Development Agreement;
- Zone Change;
- Specific Plan Adoption;
- Site Plan and Design Review;
- Conditional Use Permit(s); and
- Subsequent Approvals.
    - Issuance of applicable grading, building, and encroachment permits; and
    - Public Works: Approval of Landfill Gas Control System Plans and Specifications.

Los Angeles Regional Water Quality Control Board – Responsible Agency

- National Pollutant Discharge Elimination System (NPDES) Permit; and
- Waste Discharge Permit.

California Department of Transportation – Responsible Agency

- Encroachment Permit.

California Department of Toxic Substances Control – Responsible Agency

- Response Plan Approval.

Los Angeles County Department of Public Health (as Local Enforcement Agency [LEA]) – Responsible Agency

- Landfill Cap Final Design Plan Review and Approval;
- Landfill Gas Mitigation Systems Final Design Plan Review and Approval; and
- Closure/Reinstallation of Monitoring Wells.

California Department of Resources Recycling and Recovery (CalRecycle) – Responsible Agency

- Landfill Cap Final Design Plan Review and Approval; and
- Landfill Gas Mitigation Systems Final Design Plan Review and Approval.

South Coast Air Quality Management District (SCAQMD)

SCAQMD Rule 403 (requiring control of fugitive dust emissions) and other applicable permitting requirements, which could include Rules 1150 (requiring a permit to excavate landfill materials), 1466 (requiring control of particulate emissions from soils with toxic air contaminants), 402 (prohibiting the discharge of air contaminants or other materials that causing a public nuisance), and 1166 (requiring control of emissions from VOC impacted materials).

3.0 INITIAL STUDY CHECKLIST

3.1 BACKGROUND

1. **Project Title:**
   Figueroa Street Business Park Project

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

3. **Contact Person and Phone Number:**
   McKina Alexander, Senior Planner
   City of Carson
   310.952.1761 ext. 1326
   planning@carsonca.gov

4. **Project Location:**
   The proposed project is located at 20601 South Main Street in the City of Carson, California.

5. **Project Sponsor's Name and Address:**
   Carson Main Street, LLC
   Scott Haugen
   150 S. 5th Street, Suite 2675
   Minneapolis, MN 55402
   (612) 800-8522

6. **General Plan Designation:**
   Mixed Use, Business Park (MU-BP)

7. **Zoning:**
   Manufacturing Light with Organic Refuse Landfill Overlay and Design Review Overlay (ML-ORL-D)

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

9. **Surrounding Land Uses and Setting:**
   Surrounding land uses include a mixture of commercial, light industrial, and residential uses; refer to Section 2.2, *Environmental Setting*.

10. **Other public agencies whose approval is required:**
    Los Angeles Regional Water Quality Control Board, California Department of Transportation, California Department of Toxic Substances Control, Los Angeles County Fire Department, Los Angeles County Department of Public Health.

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 Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18), the City distributed letters to applicable Native American tribes informing them of the project on February 1, 2022. Refer to Section 4.18, *Tribal Cultural Resources*, for additional information regarding the City's AB 52 and SB 18 consultation efforts.

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 are recommended to avoid or reduce such impacts to less than significant 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, there are no officially designated scenic vistas or visual resources within 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. According to the General Plan EIR and California Department of Transportation, *State Scenic Highway System Map*, there are no officially-designated or eligible State scenic highways in the City.[1] The nearest officially designated scenic highway is a segment of State Route 91 from State Route 55 to Yorba Linda Boulevard, approximately 31.8 miles to the east of the project site.[2] As such, the project would not have the potential to 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, *California State Scenic Highway System Map*, https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983, accessed September 09, 2021.
[2] Ibid.

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 mentioned in Section 2.0, *Project Description*, the City adopted an update to the General Plan on April 4, 2023, after this environmental document had been prepared but prior to its release. Based on the previous General Plan *Land Use Map*, adopted December 18, 2007, the project site was designated Mixed Use, Business Park (MU-BP). The MU-BP designation allowed for commercial, and business park/limited industrial uses. No residential uses were allowed. The updated General Plan (*Carson 2040 General Plan*) *Land Use Map* revised the project site designation to Flex District (FLX). The FLX designation permits a wide range of uses including offices, research and development, limited light-industrial uses, hotels, local and regional retail commercial uses, commercial entertainment uses, and gas/charging stations in mid- and high-intensity settings, as well as residential uses in designated locations not including the project site. Under the FLX designation, warehousing/distribution/logistics facilities larger than 30,000 square feet are only permitted on the project site with approval of a development agreement. For the purposes of this environmental document, the prior land use designation of MU-BP is analyzed throughout. Based on the *City of Carson Zoning Map*, the project site is zoned Manufacturing Light with Organic Refuse Landfill Overlay and Design Review Overlay (ML-ORL-D). The project proposes a zone change to rezone the site from ML-ORL-D to Figueroa Street Business Park Specific Plan. As discussed in Section 2.0, the project site was formerly part of the Gardena Valley Landfill and has since been capped and is currently undeveloped. Surrounding land uses include a mixture of light industrial, commercial, and residential uses; refer to Exhibit 2-2, *Site Vicinity*. Based on the project's urbanized setting, the following analysis focuses on the project's potential to conflict with applicable zoning and other regulations governing scenic quality. Table 4.1-1, *Municipal Code Consistency Analysis Governing Scenic Quality*, provides a consistency analysis of the proposed project and relevant development standards in regard to scenic quality outlined in Municipal Code Article IX, Part 4, Division 6, *Site Development Standards*, which includes site development standards for industrial zones. Refer to Section 4.11, *Land Use and Planning*, for a discussion concerning the project's consistency with other applicable zoning requirements.

Table 4.1-1
Municipal Code Consistency Analysis Governing Scenic Quality

Relevant Section	Consistency Analysis
9146.29 Encroachments: Every part of a required yard or open space shall be open and unobstructed from finished grade to the sky except for facilities and activities as follows: A. Projections from buildings (such as eaves, awnings and shading devices; signs; architectural features; utility meters; conduits and pipes; unenclosed and unroofed stairways, landings, porches and balconies; chimneys; and mechanical equipment) may project into a required yard not more than one-half of the width of the required yard, except that only such projections permitted into a required front yard or a required side yard abutting a street shall be for eaves, awnings, shading devices, architectural features and signs. No projections are permitted into future right-of-way areas as determined under Municipal Code Section 9146.22. B. Free-standing mechanical equipment is not permitted in any required yard except those additional yard areas required because of building height. C. Utility-owned facilities are permitted in any required yard if also located in an approved utility easement.	**Consistent.** The proposed front, side, and rear setback yards would be free from the encroachments specified in Municipal Code Section 9146.29; refer to Exhibit 2-4, *Conceptual Site Plan*. No building projections (A), free-standing mechanical equipment (B), utility-owned facilities (C), swimming pools (D), display of signs (E), outdoor display of goods (H), outdoor storage (I), employee recreation/eating facilities (J), or railroad spur tracks (L) are proposed within required yards. The project site does not abut a residential zone; therefore, the project is not subject to Section 9146.29(F), regarding fences, walls and hedges. Nonetheless, as indicated in Section 2.0, *Project Description*, eight-foot-tall maximum wrought iron fences would be constructed at the northern and southern boundaries of the site for screening and security purposes. Seven-foot-tall manual tube steel truck gates and eight-foot tall wrought iron fences would be installed between Buildings 1 and 2, as well as south of Building 3. All gates would be equipped with Knox boxes for emergency access. As permitted under Section 9146.29(G), the proposed project would provide landscaping improvements, including a variety of ornamental trees, shrubs, and ground cover; refer to Exhibit 2-5, *Conceptual Landscape Plan*. The street frontage along Figueroa Street and South Main Street, and the northern perimeter of the site may be

Relevant Section	Consistency Analysis
D. Signs are permitted in required yards other than in existing or future street rights-of-way if in accordance with the provisions of Municipal Code Section 9146.7. E. Swimming pools are permitted in required yards other than future right-of-way areas provided the pool is set back from the front lot line at least twenty-five (25) feet or twenty-five (25) percent of the lot depth, whichever is less, and is not less than five (5) feet from any other lot line. F. Fences, walls, and hedges shall not be higher than eight (8) feet above finished grade in a future right-of-way, front yard, or in a side or rear yard which abuts a residential zone. In a required front yard or abutting future right-of-way area, any portion of a fence, wall or hedge above three and one-half (3-1/2) feet in height shall not impair vision by obscuring more than ten (10) percent of the area in the vertical plane unless approved by the Director pursuant to the procedures and requirements for Site Plan and Design Review contained in Municipal Code Section 9172.23. G. Landscaping (other than hedges) is permitted in any required yard or open space. H. Outdoor display of goods. The following items may be displayed in any required yard area, but not in a required parking area: A. Vehicles (automobiles, motorcycles, motorscooters, bicycles, recreational vehicles, trucks, mobile homes, or other vehicles). B. Boats. C. Agricultural produce. D. Nursery stock. E. Flowers and plants. F. Christmas trees. G. Similar items as determined in accordance with the Interpretation procedure of Municipal Code Section 9172.24. o The following items may be displayed in yard areas other than a required front yard and any abutting future right-of-way area, but not in a required parking area: H. Garden equipment and supplies. I. Building materials. J. Monuments, tombstones, statuary. K. Similar items as determined in accordance with the Interpretation procedure of Municipal Code Section 9172.24. L. Items displayed must be in the form in which marketed (no raw materials or subassemblies). I. Outdoor storage is permitted only in yards other than a required front yard and abutting future right-of-way area, but not in a required parking area. Outdoor storage areas shall be screened from view from any adjoining public street or walkway. J. Employee recreation and eating facilities (no buildings) are permitted in any yard other than a required front yard and adjacent future street right-of-way, but not in a required parking area.	planted with eastern redbud trees, bronze loquat trees, Australian willow, crape myrtle trees, and fruitless olive trees, as well as a variety of drought tolerant ground cover and shrub masses (e.g., John Dourley manzanita, blue grama grass, Rosenka bougainvillea, sage-leaf rock rose, Spanish lavender, green cloud Texas ranger, deer grass, feathery cassia, smokey coast rosemary, and colorguard yucca). Lastly, no parking is proposed within ten feet of existing or future street right-of-way (i.e., Figueroa Street and South Main Street). Approximately 25 feet of landscaping would be provided along Figueroa Street and South Main Street as a buffer between the roadway right-of-way and the project's parking area.[3] The proposed project would be consistent with Municipal Code Section 9146.29(K) in this regard.

[3] GAA Architects, *Figueroa Street Business Park – Development Plans & Renderings*, Sheet No. A1.1A, March 19, 2021.

Relevant Section	Consistency Analysis
K. Parking is permitted in required yards except the area within ten (10) feet of an existing or future street right-of-way. (See Municipal Code Section 9162.52.) L. Railroad spur tracks are permitted in any yard other than a required yard adjacent to a street (front or side) and any adjacent future street right-of-way. M. Any person, firm or corporation violating any provision of this Section shall be guilty of an infraction and shall be punishable as provided in Chapter 2 of Article I of this Code. (Ord. 79-479, § 8; Ord. 90-905, § 1; Ord. 91-945, § 1) Other Site Development Standards	
9146.4 Trash Areas: Trash and recycling areas shall be provided in accordance with Division 4 of Part 6 of this Chapter. (Ord. 93-1013, § 3).	**Consistent.** The project would include several proposed trash and recycling areas. The proposed trash and recycling areas for Building 1 would be located at the northeast and southeast corners of the building and would not interfere with pedestrian and vehicular traffic. Building 2 would include trash and recycling areas to the northwest and southwest of the building. Both of the buildings trash areas would be accessed via manual rolling tube steel gates located between the buildings to the north and south. Building 3 would include trash enclosures at the southwest side of the building. Building 4 would include trash and recycling enclosures near the southwest corner of the building. The enclosures would be constructed in accordance with City standards (Municipal Code Section 9164.3, *Nonresidential Trash Areas*). As such, the proposed project would be consistent with Municipal Code Section 9146.4 in this regard.
9146.7 Signs*: A. Business signs are permitted, subject to the following: 1. All business signs and sign structures shall be permitted in conformance with development plans which have been approved pursuant to the Site Plan and Design Review procedures (including the number of signs and sign structures to be permitted) as provided in Municipal Code Section 9172.23. All signs and sign structures shall also comply with the minimum requirements, as outlined in this Section of the Zoning Ordinance. The total sign area per lot shall not exceed an area in square feet equal to two (2) times the linear feet of lot frontage on a public street or streets for the first one hundred (100) feet of frontage, plus one-half (1/2) times the frontage in excess of one hundred (100) feet. Window signage shall not exceed ten (10) percent of window area. Lot frontage on a freeway shall not be considered in computing this figure. When the total frontage of a lot is less than the square root of the lot's area, said frontage shall be deemed to be equal to the square root of the lot's area for the purpose of determining the permitted sign area. Any primary use which is developed commercially may be permitted to have a sign area equal to that permitted by Municipal Code Section 9136.7(B)(2); provided, that a deed restriction is recorded in the offices of the County Recorder, restricting the use on the property to a commercial use, and proof of such recordation is submitted to the satisfaction of the Director.	**Consistent.** Tenant signage with approved address numbers, building numbers, or building identification would be constructed on all Buildings (Buildings 1-4). All affixed building signs would not project above the height of the buildings or roof facia. No window signage is proposed. The City would verify the positioning and size of future project signage conform to the design standards included in Municipal Code Section 9146.7 as part of the Site Plan and Design Review Process.

Relevant Section	Consistency Analysis
2. Repealed by Ord. 16-1602. 3. A ground sign in excess of six (6) feet in height shall not be permitted. The distance between ground elevation and the bottom of a ground sign shall not exceed one (1) foot. Not more than one (1) ground sign shall be permitted on a lot. No ground sign shall be erected until written approval is obtained from the City Traffic Engineer. Such signs shall be in conformance with development plans which have been approved pursuant to the Site Plan and Design Review procedure as provided in Municipal Code Section 9172.23. 4. A sign may be affixed to a building but shall not project above the height of the building wall or roof fascia. 5. A sign shall not project into an existing or future right-of-way. 6. No "A" frame or "sandwich" sign or scintillating, flashing or revolving sign shall be permitted. 7. Electronic message center signs are permitted, subject to the following: (a) Such sign shall be at least one hundred (100) feet from a residential zone. (b) Such sign shall be at least five hundred (500) feet from any other electronic message center sign. (c) Such sign shall be affixed to a pole and subject to the pole sign limitations of this Chapter. A conditional use permit (CUP) shall be required for all electronic message center signs in accordance with provisions set forth in Municipal Code Section 9172.21. Approval shall not be granted if the Commission finds that the proposed sign would interfere with traffic signals, disrupt normal traffic flow or otherwise create a safety hazard.	
9146.8 Utilities: All new utility lines, other than major transmission lines, shall be placed underground. This requirement may be waived by the Commission where topography, soil, undue financial hardship or other conditions make such underground installation unreasonable or impractical. Undergrounding shall be in accordance with the applicable rules and regulations of the utility, as currently on file with the California Public Utilities Commission. All aboveground equipment (other than pole lines when permitted), such as transformers and pedestal terminals, which are visible from an adjacent public street or walkway, shall be within a solid enclosure or otherwise screened from public view. Such enclosure/screening shall be in accordance with the utility's service requirement.	**Consistent.** As detailed in Section 2.0, *Project Description*, and Section 4.19, *Utilities and Service Systems*, the project proposes water, sewer, drainage, and electric utility infrastructure improvements to serve the proposed business park facility. All utility infrastructure improvements would be placed underground in conformance with Municipal Code Section 9146.8 requirements. It is acknowledged that there are existing Southern California Edison (SCE) power poles and 66-kV overhead transmission lines along South Main Street. No changes are proposed to these existing SCE utilities. The project would be consistent with Municipal Code Section 9146.8 in this regard.
9146.9 Site Planning and Design: In the case of a commercial or industrial use located on a corner lot, no public pedestrian entrance from a side street shall be located less than one hundred (100) feet from any residential zone. Roof-mounted structures and equipment shall not extend more than ten (10) feet above the roof, measured from the point of attachment. If such roof projections are not incorporated in the building design as	**Consistent.** The proposed project is not located on a corner lot. Therefore, the standards regarding public pedestrian entrances under Municipal Code Section 9146.9 do not apply to this project. Heating, ventilation, and air conditioning (HVAC) equipment would be roof-mounted, and also screened from public view via parapets. HVAC equipment would not extend more than five feet above the roof.

Relevant Section	Consistency Analysis
architectural features, they shall be screened from view from any adjoining public street or walkway. Mechanical equipment not enclosed within a building shall be screened from view from any adjoining public street or walkway. Within one hundred (100) feet of a residential zone, there shall be no opening in the wall of a nonresidential building where such wall faces a residential zone. Within any D (Design Overlay) designated area, all development subsequent to the date of such designation shall be in conformance with development plans which have been approved pursuant to the Site Plan and Design Review procedure as provided in Municipal Code Section 9172.23. No permit shall be issued for grading or construction involving significant exterior changes, as determined by the Director, which is not in conformance with such approved development plans.	The project would install an electrical transformer at each of the southern sides of Buildings 1 through 3. Each transformer would be screened from public view. No other mechanical equipment outside of the proposed structures would be readily visible by the public. The project site is located within a Design Overlay zone; therefore, the standards related to Design Overlay designated areas apply to the project. All development would be in conformance with development plans which have been approved pursuant to the Site Plan and Design Review procedures as provided in Municipal Code Section 9172.23. The project would be consistent with Municipal Code Section 9146.9 in this regard.
Source: City of Carson, *Carson Municipal Code*, current through Ordinance No. 22-2288, passed September 21, 2022.	

As indicated in Table 4.1-1, the proposed project would be consistent with applicable Municipal Code requirements governing scenic quality. 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 Sections 4101(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. As no construction activities would be permitted after 6:00 p.m., construction-related lighting impacts from early evening construction activities, if any, would be short-term and thus, less than significant.

Operations

There are no existing lighting sources on the project site. Nevertheless, the project site is surrounded on all sides by urbanized uses (refer to Section 2.2, *Environmental Setting*) which contribute to the project area's ambient lighting. Vehicles travelling along Harbor Freeway and Figueroa Street to the west and South Main Street to the east of the project site also contribute to ambient lighting. The proposed project would increase lighting at the project site compared to existing conditions. Pursuant to Municipal Code Section 9147.1, *Exterior Lighting*, all lighting associated with the

proposed project, including interior and exterior building lighting, security lighting, surface parking lot area lighting, and landscape lighting would be directed away from all adjoining uses and shielded in a manner that would minimize spillover onto adjacent uses. Additionally, the project's lighting plan would be designed to limit light and glare in accordance with CALGreen Section 4.106.8. Conformance with Municipal Code Section 9147.1 and CalGreen requirements would reduce the project's operational lighting impacts to less than significant levels.

Project operations are anticipated to occur between the hours of 7:00 a.m. and 9:00 p.m. daily. Vehicular headlights entering and exiting the project's two main driveways along South Main Street and driveway along Figueroa Street would result in increased lighting in the project vicinity, including lighting towards light-sensitive residences approximately 110 feet east of the project site across South Main Street. However, vehicle headlights entering and exiting the project site would result in similar lighting to existing conditions within the project vicinity including lighting along Figueroa Street and South Main Steet. Additionally, an existing block wall and mature vegetation (street trees and residential landscaping) occurs along the western boundary of the residential use located east of South Main Street within the project vicinity, which would screen vehicular headlights. As a result, vehicular headlights are not anticipated to result in a significant increase in lighting conditions in the immediate project vicinity.

The proposed project's exterior building materials would be constructed of concrete tilt-up panels. The building's exterior color palette is proposed in various shades of white and grey, and would be constructed with blue glazed windows, aluminum canopies, and aluminum mullions. As such, the proposed project could result in a potential source of daytime glare. However, proposed landscaping would provide a mixture of street and parking lot trees, shrubs, and groundcovers to provide a three-tiered screening approach which would reduce potential glare emanating from the site. As such, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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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. Per the California Department of Conservation, the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[1] The site is currently disturbed vacant land. No farmland exists within the site vicinity. As such, no impact would occur in this regard.

[1] California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed August 31, 2021.

Mitigation Measures: No mitigation is required.

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

No Impact. The project site is zoned Manufacturing Light with Organic Refuse Landfill Overlay and Design Review Overlay (ML-ORL-D), 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 ML-ORL-D and is not occupied by or used for forest land or timberland. 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 Responses 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 2016/2017 Map*, updated 2019.

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). On December 2, 2022, the SCAQMD Governing Board adopted *2022 Air Quality Management Plan* (2022 AQMP). The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, updated emission inventory methodologies for various source categories. Additionally, the 2022 AQMP utilized information and data from the Southern California Association of Governments (SCAG) and its *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS). Project consistency with the SCAQMD's 2022 AQMP is achieved when the project is found to be consistent with the goals, objectives, and assumptions set forth in the 2022 AQMP, which are designed to achieve federal and State air quality standards. The SCAQMD considers projects that are consistent with the 2022 AQMP, which is intended to bring the Basin into attainment for all criteria pollutants, to also have less than significant cumulative impacts. According to the SCAQMD's *1993 CEQA Air Quality Handbook*, in order to determine consistency with the 2022 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]

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 regional 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 and regional concentrations during project construction and operations; refer to Responses 4.3(b) and 4.3(c). As such, the project would not delay the timely attainment of air quality standards or 2022 AQMP emissions reductions.

CRITERION 2:

With respect to the second criterion for determining consistency with SCAQMD and 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 the proposed project exceeds the assumptions utilized in preparing the forecasts presented in the 2022 AQMP. Determining whether a project exceeds the assumptions reflected in the 2022 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?*

Growth projections included in the 2022 AQMP form the basis for the projections of air pollutant emissions and are based on general plan land use designations and 2020-2045 RTP/SCS demographics forecasts. The population, housing, and employment forecasts within the 2020-2045 RTP/SCS are based on local general plans as well as input from local governments, such as the City. The SCAQMD has incorporated these same demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment) into the 2022 AQMP.

As mentioned in Section 2.0, *Project Description*, the City adopted an update to the General Plan on April 4, 2023, after this environmental document had been prepared but prior to its release. Based on the previous General Plan *Land Use Map*, adopted December 18, 2007, the project site was designated Mixed Use, Business Park (MU-BP). Therefore, for the purposes of this environmental document, the prior land use designation of MU-BP is analyzed throughout. The MU-BP designation allows for commercial and business park/limited industrial uses and to limit those involving hazardous or nuisance effects. This designation typically includes manufacturing, research and development, wholesaling, and warehousing, with a very limited amount of supportive retail and services uses. Based on the *City of Carson Zoning Map*, the project site is zoned Manufacturing Light with Organic Refuse Landfill Overlay and Design Review Overlay (ML-ORL-D). The ML zone is created primarily for small and medium size industrial uses, which are not likely to have adverse effects upon each other or upon neighboring residential and commercial zones.

[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.

The project proposes to construct three industrial/business park structures and one general commercial/retail structure, totaling approximately 313,266-square feet in accordance with the proposed Figueroa Street Business Park Specific Plan (Specific Plan). Once adopted, the Specific Plan would codify the development standards, design guidelines and implementation strategies for the project. The uses permitted in the Specific Plan would include industrial business park and commercial uses. The project would require a Zoning Code Amendment to accommodate the Specific Plan. Therefore, the proposed project would be consistent with the Specific Plan and Zoning Code upon project approval.

As discussed in Section 4.14, *Population and Housing*, while the project does not involve residential development, the project is expected to generate approximately 353 employees. While it is likely that future employees already live in the City or would commute in from neighboring jurisdictions, this analysis conservatively assumes all 353 future employees would move into the City for employment. Based on a conservative estimate of all 353 employees and their families relocating to Carson and the City's average household size of 3.35, project implementation could result in a population increase of up to 1,183 persons.[2] Based on this information, population growth associated with the project would represent only a 1.3 percent increase above the City's estimated 2022 population of 92,362 persons.[3] Further, SCAG growth forecasts estimate the City's population to reach 105,200 persons by 2045, representing a total increase of 11,600 between 2016 and 2045.[4] The project's anticipated population increase (1,183 persons) would represent approximately 10.2 percent of the City's anticipated population growth by 2045, or 1.1 percent of the City's projected population by 2045. As the project would not cause SCAG's population forecast to be exceeded, the project would not cause the City's General Plan buildout population forecast to be exceeded. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. Additionally, as the SCAQMD has incorporated these same projections into the 2022 AQMP, it can be concluded that the proposed project would be consistent with the projections.

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 for the project; refer to Responses 4.3(b) and 4.3(c). As such, the proposed project would achieve this 2022 AQMP consistency criterion.

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

The project would implement various SCAG policies and would be consistent with the SCAG 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS contains actions to achieve vehicle mile reductions (VMT) reductions required under Senate Bill (SB) 375.[5] The proposed project is located within a developed portion of the City and would be within 550 feet of a major transit stops along Hamilton Avenue (e.g., Amtrak-serving bus stop between West Del Amo Boulevard and West Torrance Boulevard), which would incentivize employees to take public transportation, would lower criteria pollutant emissions, and is consistent with the goals of SB 375. In

2 State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2021-2022, with 2020 Benchmark*, Sacramento, California, May 2022.

3 Ibid.

4 Southern California Association of Governments, *2020-2045 RTP/SCS Technical Report, Demographics and Growth Forecast,* September 3, 2020.

5 Senate Bill (SB) 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle greenhouse gas (GHG) emissions. Under SB 375, the California Air Resources Board is required, in consultation with the state's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.

addition, the project would be consistent with the land use envisioned in the Specific Plan and General Plan. As such, the proposed project meets this AQMP consistency criterion.

In conclusion, the determination of project consistency with the 2022 AQMP is primarily concerned with the long-term influence of a project on Basin air quality. The project 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 2022 AQMP and 2020-2045 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 With Mitigation Incorporated.

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, 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 that is primarily formed by the combustion of sulfur-containing fossil fuels. Sulfur dioxide is often used interchangeably with sulfur oxides (SO_X). 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. VOC is not considered a criteria pollutant; however, it is a precursor to O_3, which is a criteria pollutant. Due to the role VOC plays in O_3 formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established. 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 a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The SCAQMD uses the terms ROG and VOC (see above) interchangeably.

CONSTRUCTION

The project involves remediation and construction activities associated with grading, building construction, paving, and architectural coatings. Earthwork activities would require approximately 29,000 cubic yards of cut and approximately 11,000 cubic yards of fill, which would result in approximately 18,000 cubic yards of export; refer to Section 2.5, *Phasing/Construction*. Additionally, there would be 12 cubic yards soil export during remediation, resulting in a total of 18,012 cubic yards soil export. Exhaust emission factors for typical diesel-powered heavy equipment are based on the

California Emissions Estimator Model version 2020.4.0 (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 B, *Air Quality/Greenhouse Gas Emissions/Energy Data*, for the CalEEMod outputs and results. Table 4.3-1, *Construction Emissions*, presents the project's anticipated daily short-term construction emissions.

Table 4.3-1
Construction Emissions

Emissions Source	Pollutant (pounds/day)[1,2,3]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Emissions[4,5]						
Year 1	6.67	63.99	59.40	0.18	5.98	3.08
Year 2	71.93	37.76	48.14	0.12	4.51	2.24
Maximum Daily Emissions	**71.93**	**63.99**	**59.40**	**0.18**	**5.98**	**3.08**
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 2020.4.0, as recommended by the SCAQMD.
2. Winter emissions represent the worst-case scenario for ROG, NO_X, SO_2, PM_{10}, and $PM_{2.5}$.
3. Summer emissions represent the worst-case scenario for CO.
4. 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 stockpiles with tarps; water all haul roads three times 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 B.
5. The project's 15-month construction schedule would occur over two calendar years.

Refer to Appendix B, *Air Quality/Greenhouse Gas Emissions/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 demolition, grading 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 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., at least three times of watering per day), limitations on construction hours, and adhere to SCAQMD Rule 403 – Fugitive Dust (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, impacts in this regard 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 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. As required, all architectural coatings for the proposed project structures would comply with SCAQMD Rule 1113 – *Architectural Coating*. Rule 1113 provides specifications on painting practices as well as regulates the ROG content of paint. 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.[6] Thus, there would be no impact in this regard.

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 2022 AQMP pursuant to

[6] 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, https://ww3.arb.ca.gov/toxics/asbestos/ofr_2000-019.pdf, accessed June 2, 2022.

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 2022 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 less than significant air quality impacts. 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 (i.e., O_3, $PM_{2.5}$, and PM_{10}) in the Basin. A less than significant impact would occur in this regard.

OPERATIONS

Long-term air quality impacts would consist of mobile source emissions generated from project-related traffic, and emissions from stationary area and energy sources. Emissions associated with each of these sources were calculated and are discussed below. Operational emissions generated by the proposed project were calculated with CalEEMod and are detailed in Table 4.3-2, *Long-Term Air Emissions*.

Table 4.3-2
Long-Term Air Emissions

Emissions Source	Pollutant (pounds/day)[1]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Summer Emissions						
Area	6.63	<0.01	0.04	0.00	<0.01	<0.01
Energy[3]	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	2.22	10.88	23.06	0.09	6.28	1.75
Total Summer Emissions[2]	**8.86**	**10.88**	**23.10**	**0.09**	**6.28**	**1.75**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Is Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Project Winter Emissions						
Area	6.63	<0.01	0.04	0.00	<0.01	<0.01
Energy[3]	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	2.18	11.45	22.69	0.09	3.28	1.75
Total Winter Emissions[3]	**8.81**	**11.45**	**22.73**	**0.09**	**6.28**	**1.75**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Is Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
1. Emissions were calculated using CalEEMod version 2020.4.0, as recommended by the SCAQMD.
2. The numbers may be slightly off due to rounding.
3. It should be noted that the project would not consume natural gas.

Refer to Appendix B for assumptions used in this analysis.

Area Source Emissions

Area source emissions would be generated from consumer products, architectural coatings, and landscaping. The project would use all electric landscape equipment. Additionally, the project would not consume any natural gas. As such, the project's area source emissions would not exceed SCAQMD thresholds; refer to Table 4.3-2.

Energy Source Emissions

The primary use of electricity by the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, landscaping equipment, and electronics. It should be noted that the project would not consume natural gas. Criteria air pollutant emissions from electricity use were not quantified since criteria pollutants emissions occur at the site of the power plant, which is off-site. Therefore, energy source emissions would be zero and not exceed established SCAQMD thresholds; refer to Table 4.3-2. As such, the project's energy source emissions would not exceed SCAQMD thresholds.

Mobile Source

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and ROG react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions have been estimated using CalEEMod. According to the *Traffic Impact Study for Figueroa Street Business Park Project in the City of Carson* (Transportation Impact Analysis) prepared by Kimley Horn (dated October 2022), the proposed project would generate approximately 823 total daily trips between the warehouse, manufacturing, and commercial/retail uses. The operational air quality analysis utilizes the total daily trips, which does not account for pass by trips, to provide a worst-case scenario and acknowledge the mix of heavy truck traffic that would be generated by the project; refer to Table 4.3-2.

Total Operational Emissions

As shown in Table 4.3-2, the total operational mitigated emissions for both summer and winter would not exceed established SCAQMD thresholds. Nevertheless, the project would be required to implement Mitigation Measure AQ-1, which requires the project's compliance with SCAQMD Rule 2305 – Warehouse Indirect Source Rule, recently adopted in May 2021. Total operational emissions would be further reduced by implementing emission reduction measures established in Rule 2305. Therefore, impacts in this regard would be less than significant with mitigation incorporated.

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.

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 (April 6, 2015) for the *Sierra Club vs. County of Fresno*, 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. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD) (April 13, 2015) for the *Sierra Club vs. County of Fresno*, SJVAPCD 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.

Mitigation Measures:

AQ-1 In compliance with South Coast Air Quality Management District (SCAQMD) Rule 2305 – Warehouse Indirect Source Rule, the project Applicant shall submit an Initial Site Information Report to SCAQMD no later than July 1, 2024, and the first annual Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program Report no later than January 31, 2025. The WAIRE Program Report shall be prepared and submitted to SCAQMD annually thereafter. Starting no later than January 1, 2024, the project Applicant shall implement emission reduction measures to achieve the required number of points each operating year pursuant to SCAQMD Rule 2305.

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 are residences located approximately 110 feet to the east of to the project site, across South Main Street. 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 Coastal Los Angeles County.

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. Based on default information provided by CalEEMod, the project is anticipated to disturb up to 132 acres during the grading phase.[7] The grading phase would take approximately 88 days in total to complete. As such, the project would actively disturb an average of approximately 1.5 acres per day (132 acres divided by 88 days). Therefore, the LST thresholds for one acre was conservatively utilized for the construction LST analysis. As the nearest sensitive receptors are located approximately 110 feet (33 meters) from the project site, the lowest available LST values for 25 meters were used.

Table 4.3-3, *Localized Significance of Construction Emissions*, shows the localized 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 4.3-3 are less than those in Table 4.3-1 since 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 4.3-3, 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 4.3-3
Localized Significance of Construction Emissions

Source	Pollutant (pounds/day)			
	NO_X	**CO**	**PM_{10}**	**$PM_{2.5}$**
Construction				
Year 1 On-Site Emissions with SCAQMD Rules Applied[1,2]	33.15	28.99	1.94	1.30
Year 2 On-Site Emissions with SCAQMD Rules Applied[1,3]	21.57	18.82	0.90	0.83
Localized Significance Threshold[4]	57	585	4	3
Thresholds Exceeded?	***No***	***No***	***No***	***No***

Notes:
1. 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 stockpiles with tarps; water all haul roads three times daily; and limit speeds on unpaved roads to 15 miles per hour.
2. During Year 1 of construction, the maximum on-site daily emissions occur during the grading phase for all pollutants.
3. During Year 2 of construction, the maximum on-site daily emissions occur during the building construction phase for all pollutants.
4. 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 (1.5-acre; thus, the one-acre threshold was conservatively used) and the source receptor area (SRA 4).

Refer to Appendix B for assumptions used in this analysis.

[7] The disturbed acreage during the grading phase is based on the cumulative distance traversed by the grading equipment. In order to properly grade the project site, multiple passes with grading equipment would be required. As a result, the cumulative distance traversed by the grading equipment would equate to 132 acres.

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). Since the proposed project includes a warehouse development, the operational phase LST protocol was applied. If emissions exceed the applicable operational LSTs for the project site, then additional dispersion modeling would need to be conducted to determine if there is an actual exceedance of the ambient air quality standards.

Given that the project site is approximately 14.42 acres, the five-acre operational LST was utilized. Table 4.3-4, *Localized Significance of Operational Emissions*, shows the calculated emissions for the project's operational activities compared to the applicable LSTs.

Table 4.3-4
Localized Significance of Operational Emissions

Source	Pollutant (pounds/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Operational				
Area Source Emissions	<0.01	0.04	<0.01	<0.01
Localized Significance Threshold[1]	123	1,530	4	2
Thresholds Exceeded?	***No***	***No***	***No***	***No***

Notes:
1. 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 total acreage of operations (the five-acre threshold was used), the distance to sensitive receptors (25 meters threshold was used), and the source receptor area (SRA 4).

Refer to Appendix B for assumptions used in this analysis.

As shown in Table 4.3-4, the project's operational area source emissions would be negligible and would not exceed the LSTs for SRA 4. Therefore, localized significance impacts from operations would be less than significant.

Although the project would not exceed the SCAQMD LST thresholds at the nearest sensitive receptors, the analysis below further discusses potential health risks associated with diesel particulate matter (DPM) from heavy trucks accessing the site and idling on-site during project operations.

HEALTH RISK ASSESSMENT

Health Risk Assessment Thresholds

In order to determine whether or not a proposed project would cause a significant health risk effect on the environment, the impact of the project must be determined by examining the types and levels of air toxics generated and the associated impacts on factors that affect air quality. While the final determination of significance thresholds is within the purview of the lead agency pursuant to the CEQA Guidelines, the SCAQMD recommends that the following air pollution thresholds be used by lead agencies in determining whether a project results in potentially significant impacts. If the lead agency finds that the proposed project has the potential to exceed the following air pollution thresholds, the project should be considered significant.

- *Cancer Risk*: Emit carcinogenic or toxic contaminants that exceed the maximum individual cancer risk of 10 in one million.

- *Non-Cancer Risk*: Emit toxic contaminants that exceed the maximum hazard quotient of 1.0.

Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of 10 persons per one million as the maximum acceptable incremental cancer risk due to DPM exposure. This threshold serves to determine whether or not a given project has a potentially significant development-specific and cumulative impact.

The SCAQMD has also established non-carcinogenic risk parameters for use in Health Risk Assessments (HRAs). Noncarcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below, which health effects are not likely to occur. A hazard index of less than one (1.0) means that adverse health effects are not expected. Within this analysis, non-carcinogenic exposures of less than 1.0 are considered less than significant.

Sensitive Receptors

Due to the location and spacing of the sensitive receptors and the location of all truck hauling roads, receptors were modeled with a 100-meter (82 feet) by 100-meter (82 feet) grid spacing over an approximately 2.0 kilometer (km) by 2.0 km area (BACKGRND); refer to Appendix B, *Air Quality/Greenhouse Gas Emissions/Energy Data*. In addition, smaller sensitive receptor grids of 5 meters (16 feet) by 5 meters (16 feet) were modeled over nearby sensitive receptor locations of concern:

- Residential neighborhood to the east of the project site, east of South Main Street (SR1);
- Residential neighborhood to the southeast of the project site, east of South Main Street (SR2);
- Residential neighborhood to the southwest of the project site, west of Interstate 110 (I-110) and south of Torrance Boulevard (SR3); and
- Residential neighborhood to the west of the project site, west of Interstate 110 (I-110) and north of Torrance Boulevard (SR4);

In total, 33,308 individual sensitive receptor locations were modeled over the 2.0 km by 2.0 km site domain in order to capture the maximum individual cancer risk (MICR) due to the operation of the project; refer to Appendix B for the modeling results at these sensitive receptor locations. The United States Geological Survey (USGS) 1 arc-second (about 30 meters) National Elevation Dataset (NED) terrain data was processed with AERMAP[8] and imported into AERMOD for the project area. The modeling and analysis were prepared in accordance with the SCAQMD Guidelines.

Health Risk Assessment Methodology

The air dispersion modeling for the HRA was performed using the U.S. Environmental Protection Agency (EPA) AERMOD dispersion model, version 21112. AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the stack heights of the emission sources (not a factor in this case). AERMOD requires hourly meteorological data consisting of wind vector, wind speed, temperature, stability class, and mixing height. Surface and upper air meteorological data provided by the SCAQMD for the Long Beach Airport (LGB) Monitoring Station was selected as being the most representative meteorology based on proximity.[9]

Emission Modeling

Based on Exhibit 2-4, *Conceptual Site Plan*, on-site emission sources in the model include three one-line volume source (comprised of 103 volume sources) to model the on-site truck movement and maneuvering. The off-site

[8] U.S. Environmental Protection Agency, *User's Guide for the AERMOD Terrain Preprocessor (AERMAP)*, https://gaftp.epa.gov/Air/aqmg/SCRAM/models/related/aermap/aermap_userguide_v18081.pdf, accessed August 5, 2022.

[9] South Coast Air Quality Management District, *SCAQMD Meteorological Data for AERMOD*, http://www.aqmd.gov/home/air-quality/air-quality-data-studies/meteorological-data/data-for-aermod, accessed August 5, 2022.

emission sources in the model include 12 separate one-line volume sources along: South Main Street, Torrance Boulevard, Figueroa Street, Del Amo Boulevard, and Hamilton Avenue. These off-site emissions sources are comprised of a total of 181 volume sources and represent the off-site truck movement and distribution along adjacent roadways, as modeled in the Transportation Impact Analysis. An emission rate for Particulate Matter 10 micrometers and smaller (PM_{10}), or in this case Diesel Particulate Matter (DPM) was calculated using a 2017 EMission FACtor model (EMFAC2017)[10] model run for Los Angeles County. Plume height and plume width of the emissions from heavy trucks were calculated using Haul Road Volume Source Calculator built in AERMOD using roadway width of each roadway segment and vehicle height of 4.27 meters (14 feet) in compliance with the California Vehicle Code (CVC) Section 35250. Based on the Transportation Impact Analysis, the project would have approximately 141 truck trips per day. Refer to Appendix B, for all emission calculations, EMFAC2017 model runs, and AERMOD results.

Transport Refrigeration Units (TRUs)

Due to the permitted uses identified in Table 2-3, it was assumed that approximately ten percent of the total daily heavy duty truck trips (i.e., eight truck trips) would be equipped with Transport Refrigeration Units (TRUs).[11] TRUs are powered by diesel internal combustion engines that are designed to refrigerate or heat perishable goods and are connected to a trucks trailer. A DPM emission factors of 2.58 grams per hour (TRU trailer units) and 1.86 grams per hour (truck TRUs) were taken from the CARB *Preliminary Health Analyses: Transport Refrigeration Unit Regulation; Table II.G.1*, dated October 2019; refer to Appendix B for emission modeling. It was conservatively assumed that each TRU would be idling on site for approximately 30 minutes. Using the CARB, *2019 Preliminary Health Analyses of TRU's, Health Analyses Files for TRUs*, methodology, an emission rate of 9.29E-04 grams per second (g/s) for idling on-site TRU units was calculated. Following the CARB modeling guidance, it was conservatively assumed that approximately 56 weekly TRU trips with an average idling time of 30 minutes and an emission rate of 3.10E-06 g/s per square meter would be split evenly at Buildings 1 through 3. These TRU emissions were modeled as area sources at Buildings 1 through 3; refer to Appendix B, for all emission calculations and AERMOD results. Lastly, emissions from on-site TRU units were assigned a release height of 3.65 meters (12 feet).

Health Risk Calculation

The model was run to obtain the peak one-hour and period (annual) average concentrations in micrograms per cubic meter [$\mu g/m^3$] at nearby sensitive receptors. According to the SCAQMD's Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588), air dispersion modeling is required to estimate (a) annual average concentrations to calculate the Maximum Individual Cancer Risk (MICR), the maximum chronic hazard index (HI), the zones of impact, and excess cancer burden; and (b) peak hourly concentrations to calculate the health impact from substances with acute non-cancer health effects.

The Hotspots Analysis and Reporting Program Version 2 (HARP2) Air Dispersion and Risk Tool (ADMRT) was employed to calculate the health risks of the project on the sensitive receptors near the project site. HARP2 was created for the purpose of assisting and supporting the local California Air Pollution Control and Air Quality Management Districts with implementing the requirements of AB 2588. Although designed to meet the programmatic requirements of the Air Toxics "Hot Spots" Program, HARP2 modules have also been used for preparing risk assessments for other air related programs (e.g., air toxic control measure development, facility permitting applications, roads, ambient monitoring evaluations, CEQA reviews). A health risk computation was performed to determine the potential risk using the maximum annual average and the risk of developing an excess cancer was calculated on a 30-year exposure scenario for nearby sensitive receptors. The chronic and carcinogenic health risk calculations are based on the office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (Guidance Manual). Only the risk associated with operations of the proposed project was assessed, as construction emissions would be negligible and short-term.

[10] California Air Resources Board, *EMFAC 2017 Web Database,* https://www.arb.ca.gov/emfac/2017/, accessed August 5, 2022.
[11] Potential TRU permitted uses identified in Table 2-3 include cold storage ancillary to a primary use and food and beverage.

Note that the concentration estimate developed using this methodology is considered conservative and is not a specific prediction of the actual concentrations that would occur as a result of the project any one point in time. Actual one-hour and annual average concentrations are dependent on many variables, particularly the number and type of trucks moving and idling at specific distances during time periods of adverse meteorology.

Carcinogenic Risk

Based on the AERMOD outputs, the highest expected annual average DPM emission concentrations resulting from operation of the project (141 daily truck trips) at a sensitive receptor would be 0.0494 micrograms per cubic meter ($\mu g/m^3$). This level of concentration would be experienced at the residential uses located directly east of the project site, where DPM emissions were modeled to include emissions from TRUs at Buildings 1 through 3; refer to Appendix B. It is acknowledged that the calculations conservatively assume no cleaner technology with lower emissions would occur in future years. Cancer risk calculations are based on 30-year MICR exposure periods. As shown in Table 4.3-5, *Project Maximum Individual Cancer Risk*, the highest calculated carcinogenic risk from project implementation is 2.74 per million for 30-year exposure. As shown, impacts related to cancer risk and DPM concentrations from heavy trucks and TRUs would be less than significant at the MICR.

Table 4.3-5
Project Maximum Individual Cancer Risk

Exposure Scenario	Maximum Individual Cancer Risk (Risk per Million)[1]	Significance Threshold (Risk per Million)	Exceeds Significance Threshold?
30-Year Exposure	2.74	10	No

Notes:
1. The maximum cancer risk would be experienced at UTM NAD83 Zone 11S coordinate location 463411.56, 3827169.76. The MICR risk is provided for informational purposes as sensitive receptors do not currently exist at this location.

Non-Carcinogenic Hazards

The significance thresholds for TAC exposure also require an evaluation of non-cancer risk stated in terms of a hazard index. Non-cancer chronic impacts are calculated by dividing the annual average concentration by the REL for that substance. The REL is defined as the concentration at which no adverse non-cancer health effects are anticipated. The potential for acute non-cancer hazards is evaluated by comparing the maximum short-term exposure level to an acute REL. RELs are designed to protect sensitive individuals within the population. The calculation of acute non-cancer impacts is similar to the procedure for chronic non-cancer impacts. Currently, OEHHA has not set an acute REL for DPM. To be conservative, the acute REL for Acrolein is used instead given that Acrolein is a major component of diesel exhaust and is considered the worst-case acute REL for diesel exhaust emissions.

An acute or chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the acute or chronic exposure by the REL. The highest maximum chronic and acute hazard index associated with the emissions from the project at sensitive receptors would be 0.00535 and 0.00395 respectively; refer to Appendix B. Therefore, non-carcinogenic hazards are calculated to be within acceptable limits and a less than significant impact would occur.

As described, non-carcinogenic hazards resulting from the proposed project are calculated to be within acceptable limits. Additionally, impacts related to cancer risk and PM_{10} concentrations from warehouse operations would be less than significant at the MICR. Therefore, impacts related to health risk from warehouse operations would be less than significant.

Short-term Remediation

When the former landfill was closed in 1969 it was capped with approximately five feet of soil. Within the cover soil, elevated arsenic concentrations were identified during the SSI investigation and delineated during subsequent step-out sampling. The soils with elevated arsenic would be removed using limited excavation totaling approximately 12 cubic yards. The planned maximum excavation depth is approximately six feet below ground surface (bgs); however, the actual excavation depths would be determined in the field based on the depth to waste material, observations of potential chemical impacts (i.e., stained, discolored, wet, or saturated soil, odors in ambient air, elevated air quality readings), and confirmatory soil sampling. Excavations are planned to be completed within the soil cover material without extending into the waste material. A minimum 0.5-foot of soil cover would be maintained during the excavation to prevent uncontrolled landfill gas surface emissions and the creation of other nuisances such as dust, litter, vectors, and odors. Once the excavation activities have been completed, a Removal Action Completion Report (RACR) would be prepared and submitted to the Department of Toxic Substances Control (DTSC), including the field observations, documentation, and the results of the confirmatory soil sampling. The 12-cubic-yard remedial soil excavation would be nominal compared to the 18,000-cubic-yard soil export anticipated during construction of the proposed development. Therefore, impacts related to short-term remediation would be less than significant.

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 (VMT) 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 VMT 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 VMT 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*.[12] 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-hour 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 near the project site due to the increase in volume of traffic of 823 daily

[12] The CO Plan was not updated as part of the 2022 AQMP.

trips that would occur as a result of project implementation. Therefore, impacts would be less than significant in this regard.

AIR QUALITY HEALTH IMPACTS

As evaluated above, the project's air emissions would not exceed the SCAQMD's LST thresholds or health risk 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, air quality health impacts 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 constructing three industrial/business park structures and one general office/retail structure with associated parking and landscaping on the project site.

CONSTRUCTION

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. The project would also comply with the SCAQMD Rule 1113 – *Architectural Coating*, which would minimize odor impacts from ROG emissions during architectural coating. 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.

OPERATIONS

In relation to truck operations, the proposed project would be required to comply with the California Code of Regulations, Title 13, Sections 2485(C)(1) which limits the idling time of trucks to no more than five minutes and would further minimize emissions and possible odors.

Indoor Agriculture/Farming

The project may include indoor agriculture/farming operations that could generate odors at nearby sensitive receptors. Therefore, Mitigation Measure AQ-2 would be implemented to ensure sensitive receptors are not adversely affected by agriculture/farming odors. Mitigation Measure AQ-2 would require an air treatment system that ensures off-site odors are minimized. Thus, with implementation of Mitigation Measure AQ-2, impacts would be less than significant in this regard.

Mitigation Measures:

AQ-2 Prior to the issuance of the Occupancy Permit, the project Applicant or its designee shall submit documentation to the satisfaction of the City of Carson Director of Community Development demonstrating that the following feature has been implemented if project operations include agricultural/farming:

- The indoor agriculture/farming operation shall have an air treatment system that ensures off-site odors shall not result from its activities. This requirement at a minimum means that the indoor agriculture/farming operation shall be designed to provide sufficient odor-absorbing ventilation and exhaust systems so that any odor generated inside the location of the indoor agriculture/farming operation is not detected outside the building, on adjacent properties or public rights-of-way.

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 does not support any sensitive or special status species within Carson. Currently, the project site encompasses undeveloped, disturbed land formerly used as a landfill site. As such, the site consists predominantly of disturbed habitat with limited, non-native vegetation consisting of palm trees, low-lying shrubs and grasses, and weeds. Therefore, project implementation would not adversely affect any candidate, sensitive, or special status species. No impacts 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 is limited to a 17-acre wetland within the Carson Harbor Village Mobile Home Park, located at 17701 South Avalon Boulevard, approximately 2.4-miles northeast of the project site. The project site is heavily disturbed, formerly used as a landfill site, and is located within an urbanized area of the City. Bordering the project site to the north is the Los Angeles County Flood Control Torrance Lateral. The lateral is concrete-lined and therefore does not support riparian habitat or sensitive natural communities. 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. As stated in Response 4.4(b), above, wetland habitat within the City is limited to the 17-acre wetland within the Carson Harbor Village Mobile Home, approximately 2.4-miles northeast of the project site. As discussed, the project site is heavily disturbed and undeveloped, with limited (non-native) vegetation. The adjoining Los Angeles County Flood Control Torrance lateral to the north is concrete-lined and the surrounding area is urbanized. Accordingly, the site and surrounding area does not support State or federally protected wetlands and 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. 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 located in an industrial area of Carson and thus, does not function as a wildlife corridor or nursery site. Additionally, the flood lateral located adjacent to the northern site perimeter is concrete-lined and thus, does not provide habitat to function as a nursery site. Additionally, the flood lateral is surrounded by urbanized land and therefore is unlikely to function as a wildlife corridor. Further, the project does not propose flood lateral improvements and thus would not impact the lateral. However, the existing ornamental trees and shrubs along the northern and southern site perimeter have 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. As such, 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?

Less Than Significant Impact. Municipal Code Chapter 9, *City Tree Preservation and Protection*, preserves and protects the public street trees within Carson that are of aesthetic importance and provides for the replacement of trees in order to maintain the community's natural environment. According to Exhibit 2-5, *Conceptual Landscape Plan*, the proposed project would plant a variety of trees along Figueroa Street and South Main Street including eastern redbud

trees, bronze loquat trees, fruitless olive trees, Australian willow, crape myrtle trees, all of which would be planted in 24-inch box sizes, as well as a variety of drought tolerant ground cover and shrub masses (e.g., John Dourley manzanita, blue grama grass, Rosenka bougainvillea, sage-leaf rock rose, Spanish lavender, green cloud Texas ranger, deer grass, feathery cassia, smokey coast rosemary, and colorguard yucca). No existing public street tree would be removed.

Additionally, the project would comply with all tree pruning and planting standards detailed in Municipal Code Sections 3928, *Protective Measures for Trees During Construction*, 3905, *Planting*, 3907, *Planting and Staking*, and 3908, *Planting Specifications*. As detailed, the Applicant would be required to obtain a Tree Planting Permit prior to planting any trees within the City's right-of-way to ensure the proposed street trees comply with the City's planning specifications and Parkway Tree Master Plan. Upon City approval of the Tree Planting Permit, project implementation would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant 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 and the California Department of Fish and Wildlife, *California Natural Community Conservation Plans*, no areas within the City are located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[1] 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.

[1] California Department of Fish and Wildlife, *California Natural Community Conservation Plans*, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, April 2019.

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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. The project site is located within a heavily urbanized and industrial area of Carson. According to the General Plan EIR, there are no historical resources within the City that are listed in the National Register of Historic Places. However, the State of California Office of Historic Preservation (OHP) has designated the site of the initial United States Air Meet as a historic site within the City. The site is recognized with a special commemorative bronze plaque located at 18501 South Wilmington Avenue, approximately 4.1 miles northeast of the project site. No historic resources are located on-site. Therefore, project implementation would not result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the CEQA Guidelines. No impacts would occur in this regard.

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 noted in the General Plan EIR, the City recognizes the cultural importance of Carson to the Suangna Village of Native Americans, particularly the area near the southeast corner of 230th Street and Utility Way, approximately 3.1 miles southeast of the project site. Given the distance, project implementation would not adversely impact this culturally significant area.

Project construction activities would involve approximately 29,000 cubic yards of cut and approximately 11,000 cubic yards of fill (the project would include a total of 18,012 cubic yards of export material, including the approximately 12 cubic yards of soil excavation conducted as part of the remediation activities and 18,000 cubic yards of soil excavation conducted as part of the proposed development). Further, concrete driven piles would be installed in the underlying natural alluvial soils below the former landfill site at a minimum depth of 60 feet. Thus, project excavation may encounter native soils that have the potential to support unknown buried archaeological resources. In the 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 previously unidentified cultural/archaeological resources are encountered during ground-disturbing activities, 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 may be warranted to mitigate any significant impacts. In the event that an identified cultural resource is of Native American origin, the qualified archaeologist shall consult with the project Applicant and City of Carson Planning Division to implement Native American consultation procedures. Construction shall not resume until the qualified archaeologist states in writing that the proposed construction activities would not significantly damage any archaeological resources.

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

Less Than Significant Impact. 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 ground-disturbing activities. Nonetheless, project construction activities would involve approximately 29,000 cubic yards of cut and approximately 11,000 cubic yards of fill (the project would include a total of 18,012 cubic yards of export material, including the approximately 12 cubic yards of soil excavation conducted as part of the remediation activities and 18,000 cubic yards of soil excavation conducted as part of the proposed development). Further, concrete driven piles would be installed in the underlying natural alluvial soils below the former landfill site at a minimum depth of 60 feet. Thus, project excavation may encounter native soils that have the potential to support unknown buried human remains. 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?			✓	

REGULATORY FRAMEWORK

State

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. SB 100 requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), State board, and all other State agencies incorporate this 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 such renewable energy goals.

California Building Energy Efficiency Standards (Title 24)

The 2022 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2023. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Title 24 standards.

California Green Building Standards (CALGreen)

The 2022 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2023. The California Green Building Standards (CALGreen) is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed the green building standards in an effort to meet the goals of California's landmark initiative Assembly Bill (AB) 32, which established a comprehensive program of cost-effective reductions of greenhouse gases (GHGs) to 1990 levels by 2020. CALGreen was developed to (1) reduce GHGs from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging

infrastructure. 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.[1]

California Public Utilities Commission Energy Efficiency Strategic Plan

The CPUC prepared an *Energy Efficiency Strategic Plan* (Strategic Plan) in September 2008 with the goal of promoting energy efficiency and GHG reductions. In January 2011, a lighting chapter was adopted and added to the Strategic Plan. The Strategic Plan is California's single roadmap to achieving maximum energy savings in the State from 2009 to 2020 and beyond. The Strategic Plan contains the practical strategies and actions to attain significant Statewide energy savings, as a result of a year-long collaboration by energy experts, utilities, businesses, consumer groups, and governmental organizations in California, throughout the West, nationally and internationally. The plan includes the following four strategies:

1. All new residential construction in California will be zero net energy by 2020;
2. All new commercial construction in California will be zero net energy by 2030;
3. HVAC will be transformed to ensure that its energy performance is optimal for California's climate; and
4. All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

California Energy Commission Integrated Energy Policy Report

In 2002, the California State legislature adopted Senate Bill (SB) 1389, which requires the CEC to develop an Integrated Energy Policy Report (IEPR) every two years. SB 1389 requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices, and use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.

The CEC adopted the *2020 Integrated Energy Policy Report Update* (2020 IEPR Update) Volume I and Volume III on March 23, 2021, and Volume II on April 15, 2021.[2] The 2020 IEPR Update provides the results of the CEC's assessments of a variety of energy issues facing California, many of which will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs.[3] The year of 2020 was unprecedented as the State continues to face the impacts and repercussions of several events including the COVID-19 pandemic, electricity outages, and Statewide wildfires. In response to these challenging events, the 2020 IEPR Update covers a broad range of topics, including transportation, microgrids, and the California Energy Demand Forecast. Volume I of the 2020 IEPR Update focuses on California's transportation future and the transition to zero-emission vehicles; Volume II examines microgrids, lessons learned from a decade of State-supported research, and stakeholder feedback on the potential of microgrids to contribute to a clean and resilient energy system; and Volume III reports on California's energy demand outlook, updated to reflect the global pandemic and help plan for a growth in zero-emission plug in electric vehicles.[4] Overall, the 2020 IEPR Update identifies actions the State and others can take that would strengthen energy resiliency, reduce GHG emissions that cause climate change, improve air quality, and contribute to a more equitable future.

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1 U.S. Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings, accessed August 3, 2022.

2 California Energy Commission, *2020 Integrated Energy Policy Report Update*, https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update, accessed August 3, 2022.

3 California Energy Commission, *Integrated Energy Policy Report Update Volume I - Blue Skies, Clean Transportation Executive Summary*, March 2021, https://www.energy.ca.gov/sites/default/files/2021-03/2020_IEPR_Update%20Vol%20I%20ExectuiveSummary.pdf, accessed August 3, 2022.

4 Ibid.

Executive Order N-79-20

Executive Order N-79-20, issued September 23, 2020, directs the State to require all new cars and passenger trucks sold in the State to be zero-emission vehicles by 2035. Executive Order N-79-20 further states that all medium- and heavy-duty vehicles sold in the State will be zero-emission by 2045.

Local

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.

METHODOLOGY

The impact analysis focuses on the two sources of energy that are relevant to the proposed project: electricity and transportation fuel for vehicle trips associated with project operations as well as the fuel necessary for project construction. The natural gas consumption would not be included as the project would not use natural gas on-site. The analysis of electricity usage is based on the California Emissions Estimator Model (CalEEMod) version 2020.4.0 modeling, which quantifies energy use for occupancy. 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 provider for the project site. The results of the CalEEMod modeling are included in Appendix B, *Air Quality/Greenhouse Gas/Energy Data*. The amount of operational fuel use was estimated using the California Air Resources Board (CARB) Emissions Factor 2017 (EMFAC2017) computer program, which provides projections for typical daily fuel (i.e. diesel and gasoline) usage in the County, and the project's trip generation from the *Traffic Impact Study for Figueroa Street Business Park Project, In the City of Carson* (Transportation Impact Analysis) prepared by Kimley-Horn and Associates, Inc.[5] The estimated construction fuel consumption is based on the project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips. The results of EMFAC2017 modeling and construction fuel estimates are included in Appendix B.

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis on Response 4.6(a) relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- **Criterion 1**: The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.

- **Criterion 2**: The effects of the project on local and regional energy supplies and on requirements for additional capacity.

- **Criterion 3**: The effects of the project on peak and base period demands for electricity and other forms of energy.

[5] Kimley-Horn and Associates, Inc., *Traffic Impact Study for Figueroa Street Business Park Project, In the City of Carson*, October 2022.

- **Criterion 4**: The degree to which the project complies with existing energy standards.
- **Criterion 5**: The effects of the project on energy resources.
- **Criterion 6**: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the project's energy usage is presented and addresses **Criterion 1**. The discussion on construction-related energy use focuses on **Criteria 2, 4, and 5**. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses **Criteria 2, 4, and 6**, and the building energy demand analysis discusses **Criteria 2, 3, 4, and 5**.

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. The project's estimated energy consumption is summarized in Table 4.6-1, *Project and Countywide Energy Consumption*. As shown in Table 4.6-1, the project's electricity usage would constitute an approximate 0.0060 percent increase over the County's typical annual electricity. The project's construction and operational fuel consumption would increase the County's consumption by 0.0316 percent and 0.0041 percent, respectively (**Criterion 1**).

Table 4.6-1
Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption	Los Angeles County Annual Energy Consumption[2]	Percentage Increase Countywide[2]
Electricity Consumption[1]	3,948 MWh	65,649,878 MWh	0.0060%
Fuel Consumption			
• Construction Fuel Consumption[3]	118,328 gallons	374,830,981 gallons	0.0316%
• Operational Automotive Fuel Consumption[3]	155,804 gallons	3,845,945,898 gallons	0.0041%

Notes:
1. As modeled in CalEEMod version 2020.4.0.
2. The project increases in electricity consumption are compared to the total consumption in Los Angeles County in 2020. The project increases in automotive fuel consumption for project construction are compared with the projected Countywide fuel consumption in 2023, and the increases in automotive fuel consumption for project operation are compared to that in 2024.
   Los Angeles County electricity consumption data source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms. energy.ca.gov/elecbycounty.aspx, accessed August 3, 2022.
3. Project fuel consumption calculated based on CalEEMod results. Based on the *Traffic Impact Study for Figueroa Street Business Park Project, In the City of Carson*, prepared by Kimley-Horn and Associates, Inc. (dated October 2022), the project would generate 823 trips per day. Countywide fuel consumption is from the California Air Resources Board EMFAC2017 model.

Refer to Appendix B for assumptions used in this analysis.

Construction Energy Consumption

During construction, the project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during grading, building construction, paving, and architectural coating. As indicated in Table 4.6-1, the overall fuel consumption during project construction would be 118,328 gallons, which would result in a slight increase (0.0316 percent) in fuel use in the

County. As such, project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**).

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 (i.e., Title 13, California Code of Regulations Section 2485). 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. In addition, because the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**Criterion 4**).

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 nonrecycled materials.[6] It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. 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, or building materials, or methods that would be less energy efficient than at comparable construction sites in the region or State. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources (**Criterion 5**) and a less than significant impact would occur in this regard.

Operational Energy Consumption

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Based on the Transportation Impact Analysis, the proposed project is projected to result in approximately 823 daily trips. Since the proposed project include industrial park land use, it is expected to attract heavy vehicle traffic, mainly in the form of large multi-axle trucks. Large trucks generally occupy more space on the roadway; therefore, in order to show the equivalent impacts of project-generated trucks, the project trip generation is converted to passenger car equivalents (PCE). The operational energy analysis has used the non-PCE adjusted trips to provide a worst-case scenario and acknowledge the mix of heavy truck traffic that would be generated by the project. As indicated in Table 4.6-1, project operations are estimated to increase approximately 155,804 gallons of fuel consumption per year, which would increase Countywide automotive fuel consumption by 0.0041 percent. The project does not propose any unusual features that would result in excessive long-term operational fuel consumption (**Criterion 2**).

The key drivers of transportation-related fuel consumption for the proposed project are heavy-duty trucks traveling to and from the project site. Additionally, passenger vehicle and light- and medium-duty trucks trips also account for a portion of the transportation-related fuel consumption. At the time of this analysis, it has not been determined if the ultimate tenant would operate its own fleet and most warehouse operators have no control over the trucks entering and exiting their facilities. Consequently, it is infeasible to require trucks with particular emission profiles (e.g., zero-emission [ZE], near-zero-emission [NZE], or 2010 or beyond model year trucks) to visit the project site.

The project would also consume fuel in the form of employees driving to and from the project site. However, employee commuting factors are outside of the scope of the design of the proposed project. Notwithstanding, the project would

[6] California Department of Resources Recycling and Recovery, *Green Building Materials*, https://www.calrecycle.ca.gov/greenbuilding/materials, accessed December 27, 2021.

include electric vehicle/clean air/vanpool spaces for passenger vehicles, as well as bicycle parking, in compliance with CALGreen Code. This requirement would encourage and support alternative modes of travel and thus reduce the petroleum fuel consumption (**Criterion 4** and **Criterion 6**).

Therefore, fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. A less than significant impact would occur in this regard.

Building Energy Demand

The CEC developed 2020 to 2030 forecasts for energy consumption and peak demand in support of the 2019 IEPR for each of the major electricity and natural gas planning areas and the State based on the economic and demographic growth projections.[7] CEC forecasts that the Statewide annual average growth rates of energy demand between 2019 and 2030 would be up to 1.10 percent for electricity.[8] As shown in Table 4.6-1, operational energy (electricity) consumption of the project would represent approximately 0.0060 percent increase in electricity consumption over the current Countywide usage, which would be significantly below CEC's forecasts. Therefore, the project would be consistent with the CEC's energy consumption forecasts and would not require additional energy capacity or supplies (**Criterion 2**). Additionally, the project would consume energy during the same time periods as commercial and light industrial developments and would consume energy evenly throughout the day. As a result, the project would not result in unique or more intensive peak or base period electricity demand (**Criterion 3**).

The proposed project would be required to comply with 2022 Title 24, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the 2022 Title 24 standards significantly reduces energy usage. The Title 24 Building Energy Efficiency Standards are updated every 3-year and become more stringent between each update, as such complying with the latest 2022 Title 24 standards would make the proposed project more energy efficient than existing buildings built under the earlier versions of the Title 24 standards (**Criterion 4**).

The electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS) reflected in SB 100. 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 the end of 2020, 44 percent by the end of 2024, 52 percent by the end of 2027, 60 percent of total procurement by 2030, and 100 percent of total procurement by 2045. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development projects will not result in the waste of the finite energy resources (**Criterion 5**).

The project would not cause wasteful, inefficient, and unnecessary consumption of building energy during project operation, or preempt future energy development or future energy conservation. A less than significant impact would occur.

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 project would comply with all applicable goals and measures identified in the City's EECAP, as listed in Table 4.6-2, *Project Consistency with Community-Oriented EECAP Strategies*. The EECAP contains energy efficient goals and measures that would help implement energy efficient measures and would subsequently reduce GHG emissions within the City. Compliance with Title 24 and CALGreen standards would ensure

[7] California Energy Commission, *California Energy Demand 2020-2030 Revised Forecast*, February 2020.
[8] Ibid.

the project incorporates energy efficient windows, insulation, lighting, ventilation systems, as well as water efficient fixtures. Adherence to the Title 24 energy requirements would ensure conformance with the State's goal of promoting energy and lighting efficiency, and the City's EECAP. Therefore, the proposed project would result in less than significant impacts associated with energy efficiency plans.

Table 4.6-2
Project Consistency with Community-Oriented EECAP Strategies

Goal	Measure	Project Compliance
Goal 4: Increase Energy Efficiency in New Commercial Development	**Measure 4.1**: Encourage or Require Energy Efficiency Standards Exceeding Title 24	**Consistent.** As the 2013 Title 24 standards went into effect on July 1, 2014, the 2015 EECAP utilized efficiency measures outlined in the 2013 Title 24 standards. Since then, the 2016 Title 24, 2019 Title 24 standards, and 2022 Title 24 were adopted. The 2016 Title 24 standards, which took effect on January 1, 2017, were 5 percent more efficient than the 2013 Title 24 standards for non-residential construction. Further, the 2022 Title 24 standards, which took effect on January 1, 2023. Therefore, as the project would comply with 2022 Title 24 standards, the project would achieve an increased reduction in energy usage when compared to the 2013 Title 24 standards required by Measure 2.1.
Goal 5: Increase Energy Efficiency through Water Efficiency	**Measure 5.1**: Promote or Require Water Efficiency through The Water Conservation Act of 2009 (SB X7-7) **Measure 5.2**: Promote Water Efficiency Standards Exceeding SB X7-7	**Consistent.** The project would use low-flow water fixtures, water-efficiency irrigation system, and drought tolerant landscape in compliance with CALGreen Code. Therefore, the project would be consistent with Measure 5.1 and Measure 5.2.
Goal 6: Decrease Energy Demand through Reducing Urban Heat Island Effect	**Measure 6.1:** Promote Tree Planting for Shading and Energy Efficiency **Measure 6.2:** Incentivize or Require Light-Reflecting Surfaces	**Consistent.** The proposed project would include landscaping improvements, including a variety of ornament trees, shrubs, and groundcover. The building perimeter and parking areas would be planted with shade-providing ornamental landscaping. The proposed landscaping would also be subject to the Specific Plan Urban Design Guidelines. Therefore, the project would be consistent with Measure 6.1 and Measure 6.2.

Source: City of Carson, *Energy Efficiency Climate Action Plan*, December 2015.

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?		✓		

The information presented in this analysis is based on and supplemented with the *Geotechnical Investigation Report, Figueroa Street Business Park, SEC of Figueroa Street and LA County Flood Control Channel, Carson, California* (Geotechnical Report) prepared by TGR Geotechnical, Inc., dated February 18, 2021; refer to Appendix C, *Geotechnical Investigation Report*.

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. Southern California, including the project area, is subject to the effects of seismic activity due to the active faults that traverse the area. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated Earthquake Fault Zone. Based on the Geotechnical Report, no Alquist-Priolo Earthquake Fault Zones traverse the project site, nor is the project site located within 1,000 feet of any Holocene or young age fault. The nearest fault to the project site is the Newport-Inglewood-Rose Canyon Fault, located approximately 2.7-miles northeast of the project site. Additionally, the Palos Verdes Fault is located approximately 4.7-miles southwest of the project site and the Charnock Fault is located approximately 7.7 miles northwest of the project site. Thus, implementation of the proposed project would not result in the rupture of a known earthquake fault as delineated on an Alquist-Priolo Earthquake Fault Zoning Map. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

2) Strong seismic ground shaking?

Less Than Significant Impact. Southern California has numerous active seismic faults subjecting people to potential earthquake and seismic-related hazards. Seismic activity poses two types of potential hazards for people and structures, categorized either as primary or secondary hazards. Primary hazards are caused by the direct interaction of seismic energy with the ground; examples include ground rupture, ground shaking, ground displacement, subsidence, and uplift from earth movement. Secondary hazards are consequences of ground shaking; examples include ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, water waves (seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires. Although no known active or inactive faults exists within the project vicinity and there is a low probability of exposure to primary seismic hazards, secondary hazards pose a threat to the community as a result of the project's proximity to active regional faults.

As stated in Response 4.7(a)(1), the Newport-Inglewood-Rose Canyon Fault Zone is located in the northernmost portion of the City, approximately 2.7-miles northeast of the project site. Additionally, the Palos Verdes Fault is located approximately 4.7-miles southwest of the project site and the Charnock Fault is located approximately 7.7 miles northwest of the project site. Based on the Geotechnical Report, due to the site's proximity to several known active faults, ground shaking would be expected during the project's lifetime, and it is likely that the site would periodically experience ground shaking as a result of moderate to large magnitude earthquakes.

Accordingly, the proposed building structures could be susceptible to damage during a seismic event. To minimize potential impacts related to seismic ground motion, the Geotechnical Report recommends conformance with the current seismic design requirements of the California Building Code (CBC). The project would also adhere to Title 26, *Building Code*, of the Los Angeles County Code, as incorporated by reference in Municipal Code Section 8100, *Adoption of Building Code*. Additionally, the project would be subject to the site-specific seismic design recommendations identified in the Geotechnical Report including foundation, cement/pavement, and slab design, as well as site development recommendations to minimize the potential for damage and major injury during a seismic event. These design recommendations would maximize structural stability in the event of an earthquake. Thus, upon implementation of the site-specific seismic design recommendations identified in the Geotechnical Investigation, as required by the Los Angeles County Code Chapter 16, *Structural Design*, and adherence to CBC and Title 26 requirements, 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. Based on the Geotechnical Report prepared for the project, the project site is partially located within areas identified as susceptible to liquefaction. Based on the depth to static groundwater (Gage Aquifer) of approximately 95 feet and the clay-like nature of the alluvial soils below the landfill, potential for liquefaction, seismic settlement or ground failure is considered low to negligible. As such, impacts related to seismic-related ground failure, including liquefaction would be less than significant.

Mitigation Measures: No mitigation is required.

4) Landslides?

No Impact. The project site is generally flat with minimal elevation change. A gentle slope to the southwest and a three-foot grade differentiation is present across the project site. According to the General Plan EIR, there are no areas within the City where previous landslide movement has occurred. As such, 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.

Construction

Excavation and grading associated with the proposed remediation activities along with grading, earthwork, and landscape/hardscape installation activities associated with construction of the new business park facility could expose soils to potential short-term erosion by wind and water. The project site is generally flat and currently vegetated with non-native grasses, weeds, low-lying shrubs, and palm trees. Remediation and construction activities associated with the project would be required to implement best management practices (BMPs) to prevent sedimentation from stormwater runoff and winds; refer to Section 4.10, *Hydrology and Water Quality*. Applicable BMPs would be included in a Stormwater Pollution Prevention Plan (SWPPP) prepared as part of the required National Pollutant Discharge Elimination System (NPDES) General Construction Permit. Compliance with the General Construction Permit would minimize the potential of erosion and loss of topsoil at the project site during construction activities to a less than significant level.

Operations

As analyzed in Section 4.10, operations of the proposed project would not result in substantial soil erosion or the loss of topsoil as the majority of the project site would be impervious. Unpaved area would be improved with landscaping to minimize the potential for erosion or siltation on- or off-site; refer to Exhibit 2-5, *Conceptual Landscape Plan*. In addition, based on the Standard Urban Stormwater Mitigation Plan (SUSMP) prepared for the project and in compliance with the City's Storm Water Management and Discharge Control Ordinance (Municipal Code Chapter 8, *Storm Water and Urban Runoff Pollution Control*), project-specific system stormwater quality control measures and structural source measures would be implemented on-site, which includes modular wetlands biofiltration BMPs as stormwater treatment devices and a private underground storm drain system. With implementation of the recommended SUSMP BMPs and

compliance with existing Municipal Code requirements, operational impacts with regards to erosion or loss of topsoil would be less than significant.

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 project impact analyses regarding liquefaction, landslides, and collapse (from expansive soils), respectively.

Lateral Spreading

The General Plan 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. It is noted that lateral spreading may be present where conditions conductive to shallow liquefaction exist. As discussed in Response 4.7(a)(3), the project site is partially located within areas identified as susceptible to liquefaction . However, based on the Geotechnical Report, the potential for lateral spreading at the project site is considered low due to the depth to native soils at approximately 35 feet below the landfill. As such, impacts would be less than significant.

Subsidence

According to the General Plan, the City is located within the Dominguez and Wilmington Oil Fields. There is no documented ground subsidence associated with the Dominguez Oil Field. It is noted that subsidence has occurred within the City as a result of previous withdrawal of oil within the Wilmington Oil Field; however, based on the General Plan EIR, the City has maintained control of any further subsidence within the City.

The project site is not located within an oil field. The Dominguez Oil Field, where no evidence of previous ground subsidence has been documented, is located more than 1.4 miles northeast of the project site.[1] Further, the Wilmington Oil Field is more than 2.0 miles south of the project site.[2] As such, impacts would be less than significant.

Settlement

Based on the Geotechnical Report, the potential for seismically induced settlement within native soils underlying the landfill at the project site is low; however, the landfill material is subject to settlement. Per the Geotechnical Report, "the landfill could experience approximately 1 to 3 feet of 'primary' settlement within 3 to 6 months following regrading of the landfill and placement of 4 feet of additional soil cover and approximately 1.5 to 2.5 feet of long-term settlement due to long term creep and waste decomposition over 10 to 50 years… Since the Gardena landfill appears to be relatively uniform depth wise, the differential settlement would most likely be most significant near the limits of waste such as is visible along the southern edge of the parking lot at the subject site." The Geotechnical Report includes design recommendations for utilities, paving, flatwork, foundations, and site development to reduce impacts related to landfill settlement.

[1] California Department of Conservation, *DOC Maps: Oil & Gas – Well Finder*, https://maps.conservation.ca.gov/oilgas/, accessed September 09, 2021.
[2] Ibid.

Accordingly, with adherence to current CBC design standards and Municipal Code Section 8100 design regulations, and with implementation of the site-specific design recommendations identified in the Geotechnical Report, impacts regarding unstable geologic units or soils would be less than significant.

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. Refer to Responses 4.7(c) for project impact analysis regarding subsidence/settlement.

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.

According to the Geotechnical Report, on-site soils underlying the solid waste (greater than 35 feet) are classified as Alluvium, consisting of clayey silt and silt, with varying amounts of fine sand. Per the Geotechnical Report, "significant settlement of the pavement was observed on adjacent properties to the south of the subject site, indicating visual evidence of the reported solid waste. In the parking areas beyond the southeastern edge of the subject site differential settlement of approximately 1 to 3 feet was observed. At the limits of the settlement, severe distress and cracking of the pavement was visible." The Geotechnical Report includes design recommendations to reduce impacts related to soil instability and settlement. Implementation of the site-specific design recommendations identified in the Geotechnical Report, in addition to compliance with all required seismic safety design standards pursuant to CBC and Municipal Code Section 8100 would minimize the potential for risk of life or property as a result of geologic hazards, including expansive soils. As such, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of 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, there are no known paleontological resources or unique geologic features within the City. However, according to the Geotechnical Report, the project site consists of approximately five feet of surficial artificial fill which is underlain by landfill deposits that extend to depths of approximately 35 feet below existing grade. Native soils would be encountered below a depth of approximately 35 feet. The project proposes concrete driven piles that would be installed at a minimum depth of 60 feet below existing grade. Thus, project excavation may encounter native soils that have the potential to support unknown buried paleontological resources. In the unlikely event that paleontological resources are encountered during project construction, Mitigation Measure GEO-1 would require all project construction activities to halt until a paleontologist evaluates the find and recommends a course of action should the find be identified as a paleontological resource. With implementation of Mitigation Measure GEO-1, the project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and impacts in this regard would be reduced to less than significant levels.

Mitigation Measures:

GEO-1 Unanticipated Discovery of Paleontological Resources. If evidence of subsurface paleontological resources is found during ground-disturbing construction activities, excavation and other construction activities 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, the Applicant shall retain a paleontologist certified by the County of Los Angeles to evaluate the find prior to resuming ground-disturbing activities 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?			✓	

GLOBAL CLIMATE CHANGE

California is a substantial contributor of global greenhouse gases (GHGs), emitting over 418 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 (ppm). For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of November 2021, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 417.55 ppm.[2]

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 equivalents (CO_2e)[3] 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 2019*, July 28, 2021, https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2019/ghg_inventory_trends_00-19.pdf, accessed August 3, 2022.

2 Scripps Institution of Oceanography, *Carbon Dioxide Concentration at Mauna Loa Observatory*, https://scripps.ucsd.edu/programs/keelingcurve/, accessed August 3, 2022.

3 Carbon Dioxide Equivalent (CO_2e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

REGULATORY FRAMEWORK

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 (Assembly Bill [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, Senate Bill (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.

California Building Energy Efficiency Standards (Title 24). The *2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings* (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 became effective on January 1, 2023. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Title 24 standards.

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 implement; to reduce CO_2e emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions level of 596 million

$MTCO_2e$ under a business as usual (BAU)[4] scenario. This is a reduction of 42 million $MTCO_2e$, 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 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* (2017 Scoping Plan). 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.

On December 15, 2022, CARB released the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan), which identifies the strategies achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan contains the GHG reductions, technology, and clean energy mandated by statutes. The 2022 Scoping Plan was developed to achieve carbon neutrality by 2045 through a substantial reduction in fossil fuel dependence, while at the same time increasing deployment of efficient non-combustion technologies and distribution of clean energy. The plan would also reduce emissions of short-lived climate pollutants (SLCPs) and would include mechanical CO_2 capture and sequestration actions, as well as emissions and sequestration from natural and working lands and nature-based strategies. Under 2022 Scoping Plan, by 2045, California aims to cut GHG emissions by 85 percent below 1990 levels, reduce smog-forming air pollution by 71 percent, reduce the demand for liquid petroleum by 94 percent compared to current usage, improve health and welfare, and create millions of new jobs. This plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan.

Local

Southern California Association of Governments Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Regional Council of SCAG formally adopted the *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS). The SCS portion of the 2020-2045 RTP/SCS highlights strategies for the region to reach the regional target of reducing GHGs from autos and light-duty

[4] "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 2021 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels). Specially, these strategies are to:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

Furthermore, the 2020-2045 RTP/SCS discusses a variety of land use tools to help achieve the State-mandated reductions in GHG emissions through reduced per capita vehicle miles traveled (VMT). Some of these tools include center focused placemaking, focusing on priority growth areas, job centers, transit priority areas, as well as high quality transit areas and green regions.

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.

City of Carson 2015 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.

SIGNIFICANCE THRESHOLDS

The following thresholds of significance are based on CEQA Guidelines Appendix G. For the purposes of this analysis, implementation of the proposed project would be considered to have a significant impact on GHG emissions if it would do any of the following:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment

2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The City currently does not have thresholds of significance for GHG emissions. However, the South Coast Air Quality Management District (SCAQMD) has adopted a threshold to address significance of GHG emissions from industrial projects: 10,000 metric tons of CO_2e per year.[5] Thus, the 10,000 $MTCO_2e$ per year threshold has been selected as the

[5] South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds*, revised April 2019.

significance threshold, as it is most applicable to the proposed project. The 10,000 $MTCO_2e$ per year threshold is used in addition to the qualitative thresholds of significance set forth below from Appendix G of the CEQA Guidelines.

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

Less Than Significant Impact. 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, CH_4, and N_2O, 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, area sources, and mobile sources, while indirect sources include emissions from energy consumption, water demand, and solid waste generation.

The project proposes to construct a business park campus with facilities that can accommodate a range of uses that include offices, research and development, e-commerce and light industrial uses in three structures and one general commercial/retail structure, totaling approximately 313,266-square feet in accordance with the proposed Figueroa Street Business Park Specific Plan (Specific Plan). The California Emissions Estimator Model version 2020.4.0 (CalEEMod) was utilized to calculate the project's construction and operational 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. It should be noted that the project would not consume natural gas on-site. The CalEEMod outputs are contained within Appendix B, *Air Quality/Greenhouse Gas Emissions/Energy 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.[6] As detailed in Table 4.8-1, the proposed project would result in 47.71 $MTCO_2e$ when amortized over 30 years (1,431.16 $MTCO_2e$ in total).

Area Source. Area source emissions were calculated using CalEEMod and project-specific land use data. Project-related area sources include exhaust emissions from landscape maintenance equipment, such as lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the site. The project would use all electric landscape equipment. As noted in Table 4.8-1, the proposed project would result in 0.01 $MTCO_2e$ per year of area source GHG emissions.

Mobile Source. The CalEEMod model relies upon trip data within the *Traffic Impact Study for Figueroa Street Business Park Project, In the City of Carson* (Transportation Impact Analysis) prepared by Kimley-Horn and Associates, Inc. (dated October 2022), and project-specific land use data to calculate mobile source emissions. According to the Transportation Impact Analysis, the project would generate approximately 823 daily vehicle trips. Since the proposed project include industrial park land use, it is expected to attract heavy vehicle traffic, mainly in the form of large multi-axle trucks. Large trucks generally occupy more space on the roadway; therefore, in order to show the equivalent impacts of project-generated trucks, the project trip generation was converted to passenger car equivalents (PCE). The operational GHG analysis has used the non-PCE adjusted trips to provide a worst-case scenario and acknowledge the mix of heavy truck traffic that would be generated by the project. The project would directly result in 1,527.49 $MTCO_2e$ per year of mobile source-generated GHG emissions; refer to Table 4.8-1.

[6] 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 4.8-1
Estimated Greenhouse Gas Emissions

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO_2e[2,3]
	Metric Tons/yr[1]	Metric Tons/yr[1]	Metric Tons of CO_2e[1]	Metric Tons/yr[1]	Metric Tons of CO_2e[1]	
Direct Emissions						
Construction (amortized over 30 years)[4]	46.99	<0.01	0.25	<0.01	0.47	47.71
Area Source	<0.01	<0.01	<0.01	0.00	0.00	0.01
Mobile Source	1,486.09	0.08	1.90	0.14	42.50	1,527.49
Total Direct Emissions[2]	*1,530.08*	*0.09*	*2.15*	*0.14*	*42.97*	*1,565.21*
Indirect Emissions						
Energy	700.19	0.06	1.48	<0.01	2.13	703.80
Solid Waste	19.54	1.16	28.88	0.00	0.00	48.42
Water Demand	152.43	1.87	46.76	0.05	13.50	212.68
Total Indirect Emissions[2]	872.17	3.08	77.11	0.05	15.63	964.90
Total Project-Related Emissions[2]	***2,540.11 $MTCO_2e$/yr***					
SCAQMD GHG Threshold	***10,000 $MTCO_2e$/yr***					
Project Exceeds SCAQMD GHG Threshold?	***No***					

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxides, $MTCO_2e$/yr = metric tons of carbon dioxide equivalent per year
1. Emissions were calculated using CalEEMod version 2020.4.0, as recommended by the SCAQMD.
2. Totals may be slightly off due to rounding.
3. Carbon dioxide equivalent values calculated using the U.S. Environmental Protection Agency, *Greenhouse Gas Equivalencies Calculator*, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed January 19, 2023.
4. Construction emissions are amortized over the lifetime of the Project (assumed to be 30 years) and added to operational GHG emissions consistent with SCAQMD's guidance.

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

Indirect Project-Related Sources of Greenhouse Gases

Energy Consumption. Energy consumption emissions were calculated using CalEEMod; refer to Appendix B. Electricity would be provided to the project site by SCE. According to the project applicant, there would be no natural gas consumption on-site. The project would indirectly result in 703.80 $MTCO_2e$ per year due to energy consumption; refer to Table 4.8-1.

Solid Waste. Solid waste associated with operations of the proposed project would result in 48.42 $MTCO_2e$ per year; refer to Table 4.8-1.

Water Demand. The project would install low-flow water fixtures and utilize water-efficient irrigation systems and drought-tolerant landscaping. Emissions from indirect energy impacts due to water supply would result in 212.68 $MTCO_2e$ per year; refer to Table 4.8-1.

Conclusion

As shown in Table 4.8-1, the total amount of project related operational GHG emissions from direct and indirect sources combined would be 2,540.11 $MTCO_2e$ per year and is below the SCAQMD GHG threshold of 10,000 $MTCO_2e$ per year. Thus, impacts in this regard would be less than significant.

Short-term Remediation and Landfill Gas

Gaseous emissions from the project site to the atmosphere or off-site in the subsurface do not currently exceed regulatory thresholds. The project would involve a total of 12 cubic yards of soil excavation for the purpose of remediation during construction. The soil excavation would be nominal compared to the 18,000 cubic yards soil export during construction of the proposed development and would not introduce significant GHG emissions. Additionally, an engineered landfill cap consisting of different integrated elements, including hardscape, landscape and building foundations with building protective systems, would be installed at the site. Along with the engineering controls proposed for the site, institutional controls including a Soil Management Plan, land use covenant, and long-term operation, maintenance, and monitoring (OM&M) would be implemented. The project would also adhere to SCAQMD 403 (requiring control of fugitive dust emissions) and other applicable permitting requirements, which could include Rule 1150 for landfill excavation activities and Rule 1166 for earthwork involving VOC-impacted soils. Thus, with adherence to SCAQMD permitting requirements and implementation of a DTSC approved Response Plan, which would include the proposed remedial actions (limited soil excavation, SMP, landfill gas monitoring, land use covenant, engineered landfill cap, building protective systems, and a hardscape venting system), impacts 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. The following discussion analyzes the project's consistency with the 2020-2045 RTP/SCS, 2022 Scoping Plan, the City's CAP, and EECAP. As previously noted, the CAP is not a qualified GHG reduction plan under CEQA that the proposed project could tier the analysis of GHG emissions from, and City has not yet adopted a such plan. Therefore, the project's consistency with the CAP has been included for informational purposes only.

2020-2045 RTP/SCS Consistency Analysis

Table 4.8-2, *Project Consistency with 2020-2045 RTP/SCS* shows the project's consistency with the five key SCS strategies found within the 2020-2045 RTP/SCS that help the region meet its regional VMT and GHG reduction goals, as required by the State. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 4.8-2
Project Consistency with 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	**Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.**	**Consistent.** Transit Priority Areas (TPAs) are defined as areas within 0.5-mile of an existing or planned major transit stop or an existing stop along a High Quality Transit Corridor (HQTC). A HQTC is defined as a corridor with fixed route bus service frequency of 15 minutes (or less) during peak commute hours. Although the project is not located in a TPA or HQTC, the project is an infill project located approximately 550 feet from the nearest transit station. As discussed in *Section 4.17, Transportation*, the nearest existing transit station is serviced by Torrance Transit, Los Angeles Metro (LA Metro), and Amtrak.

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
• Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)		Furthermore, the project site is within a pedestrian-oriented area given that the site fronts existing pedestrian sidewalks to the east and is within walking and bicycling distance to existing recreational, commercial, and industrial uses. The project would also provide bicycle parking spaces, electric vehicle charging spaces, and electric vehicle parking spaces in accordance with 2022 Title 24 standards and CALGreen Code. Therefore, the project would focus growth near destinations and mobility options.
Promote Diverse Housing Choices		
• Preserve and rehabilitate affordable housing and prevent displacement • Identify funding opportunities for new workforce and affordable housing development • Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	**PGA, Job Centers, HQTAs, NMA, TPAs, Livable Corridors, Green Region, Urban Greening.**	**Not Applicable.** The proposed project would not involve residential development; as such, this emissions reduction strategy is not applicable to the project.
Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**HQTA, TPAs, NMA, Livable Corridors.**	**Consistent.** The project would install electric vehicle charging spaces and elective vehicle parking spaces as well as bicycle parking and storage spaces in accordance with the 2022 Title 24 standards and CALGreen Code. Additionally, the project would include solar ready roofing and is anticipated to be Leadership in Energy and Environmental Design (LEED) certified, although precise features are unknown at this time. As such, the project would be consistent with this reduction strategy.
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies	**Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.**	**Consistent.** As previously discussed, the project site is located approximately 550 feet from the nearest transit station. As discussed above, the nearest existing transit station is serviced by Torrance Transit, LA Metro, and Amtrak. Furthermore, the project site is within a pedestrian-oriented area given that the site fronts existing pedestrian sidewalks to the east and is within walking and bicycling distance to existing recreational, commercial, and industrial uses. Further, the project would comply with sustainable practices included in the 2022 Title 24 standards, CALGreen Code, and LEED, such as installation of solar-ready roof, electric vehicle charging spaces, electric vehicle parking spaces, vanpool/carpool parking spaces, bicycle parking and storage space, low-flow water fixtures, water-

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
• Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy		efficiency irrigation, and drought-tolerant landscaping. Thus, the project would be consistent with this reduction strategy.
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	**Green Region, Urban Greening, Greenbelts and Community Separators.**	**Consistent.** The proposed project is an infill development in an urbanized area and would not interfere with regional wildlife connectivity or agricultural land. The project would include solar ready roofing and is anticipated to be LEED certified. The project would also be required to comply with sustainable practices included in 2022 Title 24 standards and CALGreen Code, which would help reduce energy consumption and reduce GHG emissions. Thus, the project would support efficient development that reduces energy consumption and GHG emissions. The project would be consistent with this reduction strategy.
Source: Southern California Association of Governments, *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020.		

2022 Scoping Plan Consistency Analysis

The 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each AB 32 inventory sector. Provided in Table 4.8-3, *Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors*, is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan.

Table 4.8-3
Consistency with the 2022 Scoping Plan: AB 32 Inventory Sectors

Actions and Strategies	Project Consistency Analysis
Smart Growth / Vehicles Miles Traveled (VMT)	
Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	**Consistent**. The project would be located within 550 feet of a transit station and provide bicycle parking spaces and vanpool/carpool parking spaces, which would promote alternative mode of transportation to reduce VMT. As such, the project would be consistent with this action.

Actions and Strategies	Project Consistency Analysis
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	**Consistent**. The project would not consume any natural gas on-site and install all electric landscape equipment with electric remote-control valves and controllers. As such, the project would be consistent with this action.
Non-combustion Methane Emissions	
Divert 75% of organic waste from landfills by 2025	**Consistent**. The project would recycle or compost 75 percent of waste. As such, the project would be consistent with this action.
Source: California Air Resources Board, *2022 Scoping Plan*, November 16, 2022.	

CAP/EECAP Consistency Analysis

As detailed in Section 4.6, *Energy*, the 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 detailed in Section 4.6, the project would be consistent with the goals and policies of the EECAP. Furthermore, the project would be consistent with the City's CAP goals and measures as discussed in Table 4.8-4, *Project Consistency with the City's CAP*.

Table 4.8-4
Project Consistency with the City's CAP

Goal	Measure	Project Consistency Analysis
Goal EE: D – Increase Energy Efficiency in New commercial Developments	**Measure EE: D1 –** Encourage or require EE Standards Exceeding Title 24.	**Consistent.** The project would comply with the 2022 Title 24 standards. Furthermore, the project would include solar ready roofing. Additionally, the project would be LEED certified. As such, the project would be consistent with this CAP goal.
Goal EE: E. – Increase Energy Efficiency through Water Efficiency (WE)	**Measure EE: E1-** Promote or Require Water Efficiency through SB X7-7. **Measure EE: E2 –** Promoting Water Efficiency Standards Exceeding SB X7-7.	**Consistent.** The project would utilize water from water suppliers that are required to comply with Senate Bill X7-7 and the Water Sector of the AB 32 Scoping Plan. As previously discussed, the project would include low-flow fixtures, water-efficiency irrigation system, and install drought-tolerant landscaping to minimize water usage and reduce irrigation runoff. As such, the project would be consistent with this CAP goal.
Goal EE: F – Decrease energy demand through reducing urban heat island effect.	**Measure EE: F1 –** Promote Tree Planting for Shading and Energy Efficiency.	**Consistent.** As stated, the proposed project would include drought-tolerant landscaping, including a variety of ornamental trees, shrubs, accents, and groundcover; refer to Exhibit 2-5, *Conceptual Landscape Plan*. The street frontage along Figueroa Street and South Main Street, and the northern perimeter of the site may be planted with eastern redbud trees, bronze loquat trees, Australian willow, crape myrtle trees, and fruitless olive trees, as well as a variety of drought tolerant ground cover and shrub masses (e.g., John Dourley manzanita, blue grama grass, Rosenka bougainvillea, sage-leaf rock rose, Spanish lavender, green cloud Texas ranger, deer grass, feathery cassia, smokey coast rosemary, and colorguard yucca). Planter pots ranging in plant variety. such as dragons blood trees, trailing rosemary, beaked yucca, donkey tail, little ollie, raspberry ice bougainvillea, New Zealand flax, trailing gazania, bitter aloe, and foxtail agave are proposed on-site. Overall, proposed landscaping would total approximately 11 percent of the total site area. The proposed landscaping would also be subject to the Specific Plan Urban Design Guidelines. As such, the project would be consistent with this CAP goal.
Source: City of Carson, *Climate Action Plan*, December 2017.		

Overall, the project would not conflict with or impede implementation of GHG reduction goals identified in the 2020-2045 RTP/SCS, 2022 Scoping Plan, CAP, and EECAP 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. Further, as shown in Table 4.8-1, the project would not exceed the SCAQMD GHG screening threshold of 10,000 $MTCO_2e$ per year. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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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 based primarily on the following documents:

- *ASTM Phase I Environmental Site Assessment, Gardena Valley 1 & 2 Landfill, Carson, California* (Phase I ESA), prepared by Haley & Aldrich, Inc. (Haley & Aldrich), dated February 2021 (refer to Appendix D, *Hazardous Materials Documentation*); and

- *Geotechnical Investigation Report, Figueroa Street Business Park, SEC of Figueroa Street and LA County Flood Control Channel, Carson, California* (Geotechnical Report) prepared by TGR Geotechnical, Inc., dated February 18, 2021 (refer to Appendix C, *Geotechnical Investigation Report)*.

For the purpose of this analysis, the term "hazardous material" refers to both hazardous substances and hazardous waste. A material is defined as "hazardous" if it appears on a list of hazardous materials prepared by a federal, tribal,

State, or local regulatory agency, or if it possesses characteristics defined as "hazardous" by such an agency. A "hazardous waste" is a solid waste that exhibits toxic or hazardous characteristics (i.e., ignitability, corrosivity, reactivity, and/or toxicity).

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 just conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

CONSTRUCTION

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction materials (e.g., oil, diesel fuel, and transmission fluids). 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. All project construction activities would demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials, which would ensure all potentially hazardous materials are used and handled in an appropriate manner. Impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be less than significant.

OPERATIONS

The project proposes the construction of three industrial/business park structures and one general commercial/retail structure. As discussed in Section 2.4, *Project Characteristics*, anticipated tenants of the proposed business park are currently unknown; however, future tenants may include general warehouse/distribution and office users. The business park may also accommodate light industrial manufacturing, a cold storage plant and research and development users. Commercial users would be more flexible and could contain office or retail commercial uses. As such, long-term operation of the project may involve the routine transport, use, or disposal of hazardous materials. The types and quantities of hazardous substances utilized by the various types of potential future users at the project site would vary and, as a result, the nature of potential hazards would vary.

The proposed project would be subject to compliance with existing regulations, standards, and guidelines related to the transport, use, and disposal of hazardous materials established by the U.S. Environmental Protection Agency (EPA), State, County of Los Angeles, and the City of Carson. Specifically, the project is subject to compliance with existing hazardous materials regulations codified in California Code of Regulations Titles 8, 22, and 26, and their enabling legislations set forth in Health and Safety Code Chapter 6.95 as well as California Code of Regulations Title 49. Both the federal and State governments require any business, where the maximum quantity of a regulated substance exceeds the specified threshold quantity, to register with the County of Los Angeles Fire Department (LACoFD) as a manager of regulated substances and prepare a Risk Management Plan. The Risk Management Plan must contain an off-site consequence analysis, a five-year accident history, an accident prevention program, an emergency response program, and a certification of the truth and accuracy of the submitted information. Businesses would be required to submit their plans to the Certified Unified Program Agency (CUPA), which in this case would be LACoFD, which would make the plans available to emergency response personnel.

Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Impacts regarding the routine transport, use, or disposal of hazardous materials during project operations would be less than significant.

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. One of the means through which human exposure to hazardous substance could occur is through accidental release. Incidents that result in an accidental release of hazardous substance into the environment can cause contamination of soil, soil gas, and/or groundwater, in addition to any toxic fumes that might be generated. If not cleaned up immediately and completely, the hazardous substances can migrate into the soil or enter a local stream or channel causing contamination of soil and water. Human exposure of contaminated soil, soil gas, or water can have potential health effects on a variety of factors, including the nature of the contaminant and the degree of exposure.

CONSTRUCTION

Construction Equipment

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 would be less than significant in this regard.

Existing Soil, Soil Gas, and/or Groundwater Concerns

Site disturbance activities could also result in accidental conditions involving existing on-site contamination. The following analysis considers current and past uses of the project site and its vicinity, which may have resulted in existing on-site soil, soil gas, and/or groundwater contamination, of which could cause accidental conditions during site disturbance activities.

Former Operations Associated with the Adjacent Golden Eagle Refinery

According to the Phase I ESA, the project site was originally developed in the 1940s with buildings, storage yards, possible aboveground storage tanks (containing unknown materials), and wastewater ponds associated with the Golden Eagle Refinery located to the south of Torrance Boulevard. Although the structures and features associated with the adjacent Golden Eagle Refinery were decommissioned by 1956, these former uses may have the potential to have impacted subsurface soil, soil gas, and groundwater beneath the project site. However, on-site soil was excavated to a maximum depth of approximately 37 feet below ground surface (bgs) during construction of the Gardena Valley 1 & 2 Landfill, and any impacted soil from these former uses was likely excavated. Furthermore, previous subsurface investigations in the project site did not identify petroleum hydrocarbon impacted soil, soil gas, and groundwater. Nonetheless, the former uses associated with the adjacent Golden Eagle Refinery have the potential to expose construction workers to hazardous materials during site disturbance activities.

Former Operation of the Gardena Valley 1 & 2 Landfill

According to the Phase I ESA, on-site soil was originally excavated as a borrow site for the construction of the I-110 freeway located to the west, and the resultant on-site excavation was subsequently utilized as a municipal landfill known as the Gardena Valley Landfill No. 1 & 2, historically a Class II landfill. The excavation was used as a landfill without placement of an engineered liner and without current-day practices which employ landfill gas extraction or monitoring and leachate collection systems. The former Gardena Valley Landfill No. 1 & 2 operated from November

1956 until approximately October 1959 and allowed municipal and industrial wastes including crude oil-related wastes (crude oil and tank bottoms), paint sludge, auto wash sludge, latex, molasses, cutting oil, and other semi-liquids. According to the *Supplemental Site Investigation Report, Wastefill Operable Unit, Former Gardena Valley 1 & 2 Landfill Carson, California* (SSI), prepared by Haley & Aldrich, Inc. (Haley & Aldrich) and dated December 2021, the waste material is approximately 21 feet thick on average, with a maximum thickness observed at approximately 32.5 feet. It is noted that the exact thickness of the waste prism could not be identified in several locations within the former landfill due to poor recovery of waste materials. Approximately 75 percent of accepted waste was residential refuse and 25 percent was other waste, including liquid industrial waste. The former landfill was capped with soil from an undocumented source when the landfill ceased operations. Since then, the site has remained unused. According to the SSI, the thickness of the existing soil cover varies across the former landfill with average soil cover thickness observed at approximately 6.5 feet thick, the minimum soil cover thickness observed at 4.25 feet thick, and the maximum soil cover thickness observed at approximately 10 feet thick. The soil cover appears to be thickest along the central portion of the former landfill.

Soil, landfill gas, landfill liquids, and groundwater on the project site have contained concentrations of contaminates above screening levels. According to the Phase I ESA, results of previous site investigations indicated the presence of concentrations of metals, pesticides, and organics, including arsenic, dichlorodiphenyltrichloroethane (DDT), polychlorinated biphenyls (PCBs), diethylphthalate, and di-n-butylphthalate in soil. Organic chemicals and methane have also been detected in soil gas. Groundwater in the vicinity of the project site has reported elevated levels of volatile organic compounds (VOCs), although it is unlikely to have been caused by the former landfill uses of the site; refer to *Groundwater Impacts from Former Landfills Operated in the Vicinity* below for a detailed discussion.

On April 18, 1989, London Pacific Investment (LPI) entered into a Consent Agreement with the California Department of Toxic Substances (DTSC). The objective of the Consent Agreement was to investigate and mitigate releases of contaminants from the landfill and ensure that future development is achieved in a manner that ensures public health and safety and protects the environment. Subsequently, a Remedial Investigation And Feasibility Study work plan (RI/FS) was prepared for the project site and approved by the Department of Health Services (DHS) on December 28, 1989. However, due to anomalies in site hydrogeology that delayed the hydrogeologic site investigation and to address the landfill gas migration issue, the project site was then divided into two separate "operable units", consisting of "Wastefill" and "Groundwater" operable units, that were to be addressed separately. A new RI/FS, health risk assessment, as well as a Remedial Action Plan (RAP) and remedial design were prepared for the Wastefill operable unit and were approved by DTSC on June 30, 1992. The *Final Design Report for the Gardena Valley 1 & 2 Landfill, Carson, California* (1999 Final Design Report) that outlined specifications for a landfill cap and landfill gas control system for the site was prepared in June 1999 based on the general design basis of the RAP. The remedial objective included designing a landfill cap and landfill gas extraction and incineration system that would treat landfill gas concentrations to acceptable concentrations and prevent off-site migration. It should be noted that the remedial activities outlined in the 1999 Final Design Report were never implemented. In 2017, a Methane Gas Monitoring Report and a Soil Verification Report were prepared as a requirement to submit a modified RAP (with two modifications) for DTSC's approval. The first modification proposed a new soil cap design as compared to that from the 1999 Final Design Report, as the thickness of the existing soil cover in place to be a minimum of five feet. The second modification proposed the elimination of the previously proposed gas extraction system as the Methane Gas Monitoring Report found that there is no methane gas migrating to the surface.

On March 24 and 25, 2021, the project Applicant re-engaged the DTSC regarding cleanup of the project site and submitted a complete Request for Agency Oversight Application (application) and All Appropriate Inquiries (AAI) report that provides sufficient information for DTSC, pursuant to Health and Safety Code Section 25395.92(c), to prepare a California Land Reuse and Revitalization Act Agreement (CLRRA Agreement). The final executed CLRRA Agreement (Site Code: 401966-11; Docket Number: HSA-FY20/21-137) was signed by both parties on June 9, 2021. The purpose of the CLRRA Agreement is to implement CLRRA for the assessment and remediation of the project site. In accordance with the CLRRA Agreement and in support of an expedited redevelopment plan, DTSC agreed that the SSI and subsequent Draft Response Plan prepared by Haley & Aldrich, dated April 11, 2023, would focus on the Wastefill OU.

It is acknowledged that the Draft Response Plan is currently pending DTSC approval. Refer to Exhibit 2.3, *Wastefill Operable Unit*, for the limits of the Wastefill OU. Future remedial action on the Groundwater OU would be coordinated with DTSC and would likely be initiated with a monitoring program.

The SSI outlines the results and findings of the Supplemental Site Investigation program that was designed to characterize the soil cover, waste materials, native soils, and soil vapor/landfill gas at the former Gardena Valley 1 & 2 Landfill in order to evaluate human health and ecological risks in support of redevelopment activities. The SSI was performed in accordance with the approved *Revised Supplemental Site Investigation Work Plan*, dated August 2021. The findings and conclusions of the SSI include:

- The presence of an interbedded fine-grained, vegetated soil cover ranges in thickness from four to ten feet bgs;
- Results from four soil samples indicated arsenic concentrations that exceeded human health risk thresholds in the soil cover;
- Negligible impacts to native soil beneath the landfill waste (approximately 21 feet thick on average);
- Observed methane, trace VOC concentrations, and vapor pressures are generally consistent with historical data and would be expected of a Class II landfill of this age (constructed in 1950s) with a climate that yields minimal precipitation;
- VOC concentrations in soil vapor pose a potential risk to human health at select locations; and
- Identified ecological risks can be mitigated by eliminating the exposure pathway through implementation of the proposed redevelopment.

Additional investigation was done in 2022 by in order to evaluate the extent of arsenic contamination in on-site soil. A step-out sampling program was conducted in accordance with the DTSC-approved *Arsenic Step-Out Sampling Work Plan*. Step-out soil cover samples were collected to further delineate the horizontal and vertical limits of arsenic impacted soil at concentrations greater than background concentrations. The step-out sample results are presented in the SSI (under the Addendum section).

Overall, the former uses associated with the Gardena Valley 1 & 2 Landfill have the potential to expose construction workers to hazardous materials (i.e., arsenic in soil, and VOCs in soil gas) during site disturbance activities.

Groundwater Impacts from Former Landfills Operated in the Vicinity

In addition to the on-site landfill, the following off-site landfills were also formerly operated in the vicinity of the project site: Gardena Valley 4 Landfill (located west-southwest and cross-gradient to the site), Gardena Valley 5 Landfill (located south and down-gradient to the site), Cal Compact Landfill (located north-northeast and cross-gradient to the site), Werdin Dump (located northeast and cross-gradient to the site), and the Southwest Conservation Landfill 4 (located north and up-gradient to the site).

It should be noted that according to SSI, shallow unconfined groundwater occurs at depths ranging from approximately 40 to 50 feet bgs beneath the project site.

Groundwater Impacts from Adjacent Superfund Sites

According to the Phase I ESA, the project site is located approximately 0.5-mile south and down-gradient of a National Priority List (NPL, also known as Superfund site) that consists of two adjacent properties: Montrose Chemical

Corporation and Del Amo Synthetic Rubber Plant. Previous investigations performed at both properties indicated that the groundwater contamination from the Montrose Chemical Corporation site (previously a dichloro-diphenyltrichlorethane [DDT] pesticide manufacturing plant) and the Del Amo Synthetic Rubber Plant site were commingled. According to the Phase I ESA, both Superfund sites continue to be remediated by the identified responsible parties under the guidance of the United States Environmental Protection Agency (EPA). EPA's 1999 Record of Decision (ROD) does not indicate that a contamination plume from these two sites has extended beneath the project site. However, the plume margins are close to the project site and there is a lack of monitoring wells to confirm that the groundwater plume has not reached the project site. Due to the proximity of the NPL sites to the project site and their hydrogeological position to the site (i.e., up-gradient of the project site), the Phase I ESA determined that there is the potential that groundwater beneath the project site may have been or might be impacted in the future by the past releases from these NPL sites.

Potential Accidental Conditions During Site Disturbance Activities

Soil and Soil Gas Impacts

As discussed above, due to past on-site uses as well as off-site releases, there is the potential for accidental conditions involving existing and/or likely on-site contamination in soil and/or soil gas. As such, Haley & Aldrich has prepared, on behalf of the current property owner Carson Main Street, LLC, the Draft Response Plan that is currently pending DTSC approval. The purpose of The Draft Response Plan is to identify and evaluate remedial alternatives and to present the property owner's preferred remedial action addressing the landfill cover and gas control systems for the soil and waste prism (including landfill gas) components at the project site (considered as part of the proposed project). The Draft Response Plan was prepared in compliance with the California Health and Safety Code sections 25323.1 and 25356.1 and the DTSC 23 September 1998 guidance memorandum entitled "Removal Action Workplans – Senate Bill 1706." The Draft Response Plan describes various actions to remediate the project site and provides a number of alternatives to accomplish the remedial action objectives including, institutional and engineering controls, prescriptive and alternative landfill covers, and a landfill gas control system. Recommended remedial actions have been incorporated as part of project design. Refer to Section 2.4.1, *Site Remediation*, for a detailed description on the various remedial actions and selected alternative as recommended by the Draft Response Plan.

With implementation of the Draft Response Plan, the potential accidental conditions involving existing contaminated soil and soil gas at the project site would be reduced to less than significant levels.

Groundwater Impacts

As discussed above, due to past on-site uses as well as off-site releases, there is the potential for accidental conditions involving existing and/or likely on-site contamination in groundwater. According to the SSI, shallow unconfined groundwater occurs at depths ranging from approximately 40 to 50 feet bgs beneath the project site. According to the Geotechnical Report (refer to Appendix C, *Geotechnical Investigation Report*), some areas of seepage was encountered while drilling at the project site at depths ranging from 40 to 50 feet bgs. As such, construction workers could be exposed to contaminated soil gas and groundwater during excavation activities, since pile driving activities would be approximately 60 feet bgs.

As detailed in Section 4.10, *Hydrology and Water Quality*, 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. With compliance with dewatering permit requirements, impacts in this regard would be reduced to less than significant levels.

Existing Wells

According to the Phase I ESA, there are six two-inch vapor wells and two uncapped metal pipes approximately six- to eight-inches in diameter located on-site associated with the pervious subsurface investigations. Additional wells were construction as part of the SSI. As ongoing monitoring would be required for the site during project operations, the existing on-site monitoring wells, uncapped metal pipes, and any associated remedial equipment may be removed/abandoned during grading activities and re-installed thereafter to allow construction to occur unabated. All removal/abandonment and relocation of monitoring wells would be in accordance with existing federal and State laws and regulations.

Import/Export of Potentially Contaminated Materials

Implementation of the proposed project could require the import/export of fill materials, which could include unknown contaminated soils. As discussed in Section 2.4.1, a Draft Soil Management Plan (SMP) has been prepared for the proposed project by Haley & Aldrich, dated April 21, 2023, and is currently under DTSC review. The Draft SMP establishes procedures and guidelines that protect human health and the environment during the disturbance and management of potentially impacted soil and waste material at the site. The Draft SMP will require verification that all imported fill materials, and on-site materials that are used for fill, do not include hazardous substances above regulatory screening levels and that all exported materials are appropriately handled, used, and/or disposed of. With implementation of the Draft SMP, impacts in this regard would be reduced to less than significant levels.

Conclusion

In conclusion, adherence to existing regulations, including the implementation of provisions within the CLRRA Agreement and the associated site remediation activities as outlined in the Draft Response Plan, as well as compliance with applicable permitting requirements, would minimize potential impacts pertaining to accidental conditions potentially involving contaminated soils, soil gas, and/or groundwater. Upon compliance with existing regulations and recommended mitigation measures, impacts pertaining to a potentially significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during construction would be reduced to less than significant levels.

OPERATIONS

Vapor Intrusion

As discussed above, potential accidental conditions involving exposure of future users as a result of vapor intrusion into on-site buildings may occur. As such, the project proposes installation of building protective systems, including VIMS and MDAS. The VIMS system would consist of a sub-slab vapor control barrier, active venting system, conduit seals, trench vapor cut-off barriers and an integrated MDAS that activates the active venting system. The building protective systems would be incorporated into the design of on-site structures to reduce or eliminate the exposure pathway of chemicals of potential concern and alert occupants in the event of a detection.

As detailed in Section 2.4.1, the project would also include engineered landfill cap and landfill gas mitigation systems. Active venting systems are proposed under buildings as part of building protective systems, and passive venting systems are proposed under all hardscape to further reduce risk of vapor encroachment onto proposed building. The design of the engineered landfill cap and landfill gas mitigation systems would be developed as part of the development plans and would be submitted to applicable agencies (i.e., DTSC, CalRecycle, and Los Angeles County Department of Public Works Building and Safety Division) for approval prior to initiation of any ground-disturbing activities. The passive hardscape venting system allows for the natural release of landfill gas via an engineered system of below-

grade collection pipe and risers located below the engineered landfill cap. This venting system would reduce the potential for accumulation and migration of landfill gas. Moreover, a landfill gas monitoring programs at the surface and perimeter of the project site would be developed to monitor the performance of the engineering controls. Monitoring of the indoor air of any buildings on the project site would occur to ensure compliance with County of Los Angeles requirements.

Upon adherence to federal and State regulations and implementation of provisions within the CLRRA Agreement (including implementation of the Draft Response Plan), potential operational impacts in regard to contamination to soil, soil gas, and groundwater would be reduced to less than significant levels.

Accidental Conditions from Operations at the Project Site

Refer to Response 4.9(a), above, for a description of impacts related to proposed operations at the project site (i.e., business park campus with potential uses such as offices, research and development, e-commerce, and light industrial use) and regulatory requirements related to chemical safety. Upon adherence to existing regulations related to chemical safety, impacts pertaining to the potential for accidental conditions during project operations of the proposed warehouse facilities and retail building would be less than significant.

Mitigation Measures: No mitigation is required.

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 Impacts. The closest schools in the project vicinity include Carson Street Elementary (161 East Carson Street, approximately 1.0-mile from the project site), Stephen M White Middle School (22102 South Figueroa Street, approximately 1.6 miles from the project site), and Carson High School (22328 South Main Street, approximately 1.7 miles from the project site).[1] As such, the project would not have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within 0.25-mile of an existing or proposed school. 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. Government Code Section 65962.5 requires the DTSC and State Water Resources Control Board (SWRCB) 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.

According to the Phase I ESA and the California Environmental Protection Agency (CalEPA), the project site is not currently listed pursuant to Government Code Section 65962.5.[2] However, it is acknowledged that the project site was

[1] Los Angeles Unified School District, *Local District South Map*, ttps://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/33/South.pdf, May 2015.

[2] California Environmental Protection Agency, *Cortese List Data Resources*, https://calepa.ca.gov/sitecleanup/corteselist/, accessed December 10, 2021.

historically listed pursuant to Government Code Section 65962.5. As discussed under Responses 4.9(a) and 4.9(b) above, impacts in regard to previous hazardous materials on-site would be minimized with implementation of provisions within the CLRRA Agreement. Upon adherence to existing regulations, standards, and guidelines established by the federal, State, and local agencies related to the handling of hazardous materials during demolition, building construction, and operational activities, as well as compliance with provisions within the CLRRA Agreement, impacts in this regard would be reduced to less than significant levels.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. The nearest public airport to the project site is the Compton/Woodley Airport located approximately 3.5 mile to the northeast at 901 West Alondra Boulevard in the City of Compton. 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.[3] As such, the proposed project is not anticipated to result in a safety hazard or excessive noise related to the Compton/Woodley Airport. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact with Mitigation Incorporated. The City prepared the *Natural Hazards Mitigation Plan* (Mitigation Plan) in 2013 as mandated by the Disaster Mitigation Act of 2000. The Mitigation Plan provides resources and information to assist the City's residents, public and private sector organizations, and others in planning for natural, man-made, and technological hazards. The Mitigation Plan also includes a five-year action plan matrix with long- and short-term action items that aim to reduce risk and prevent loss in future hazard events. In addition, the City complies with the *Los Angeles County Emergency Management Plan*.

As indicated in Section 4.17, *Transportation*, the project does not propose geometric designs such as sharp curves or dangerous intersections and would not introduce incompatible uses to area roadways. As discussed in Section 2.4, *Project Characteristics*, the Circulation Plan of the Specific Plan provides standards and guidelines that ensure the safe and efficient movement of people and vehicles into and through the business park, addressing light trucks and passenger vehicles, heavy trucks, public transit, and non-vehicular circulation (pedestrians and bicycles). The project would install two full access driveways along Main Street on the eastern portion of the site, and a third driveway along Figueroa Street at the southwestern corner of the site; refer to Exhibit 2-4, *Conceptual Site Plan*. Internal drive aisles would have a minimum width of 26 feet and would be subject to approval of a fire access plan by the Fire Department as part of the site plan review.

The project has the potential to impact emergency access during the short-term construction process. Temporary partial lane closures may be required during installation of underground utilities in Figueroa Street and Main Street right-of-way; however, both Figueroa and Main Streets would remain open to traffic at all times. During periods of temporary partial lane closures, the project Applicant would be required to implement a temporary construction Traffic Management Plan (TMP) to maintain emergency access during the construction process (Mitigation Measure TRA-1). The TMP would include potential measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flagperson to direct traffic during heavy

[3] Los Angeles County Department of Regional Planning, *Los Angeles County Airport Land Use Plan*, *Compton/Woodley Airport – Airport Influence Area,* May 13, 2003, https://planning.lacounty.gov/assets/upl/data/pd_alup.pdf, accessed September 13, 2021.

equipment use, among others. The TMP would ensure emergency access is maintained during short-term construction activities. Thus, with implementation of Mitigation Measure TRA-1, impacts would be reduced to less than significant levels in this regard.

Mitigation Measures: Refer to Mitigation Measure TRA-1.

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 *Los Angeles County Fire Hazard Severity Zones in SRA Map*, the City of Carson, including the project site, is not designated as a very high fire hazard severity zone.[4] As such, no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

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?				✓

This section is based primarily on the *Hydrology and Hydraulics Study for Figueroa St. Business Park, 2061 S. Main Street, Carson CA, PM 5616* (Hydrology and Hydraulics Study), prepared by Kimley-Horn and Associates, Inc., dated September 16, 2022 and the Preliminary *Standard Urban Stormwater Mitigation Plan* (SUSMP), prepared by Kimley-Horn and Associates, Inc., dated September 16, 2022. Refer to Appendix E, *Hydrology and Hydraulics Study*.

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 U.S. 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 (RWQCBs) to preserve, protect, enhance, and restore water quality. The project site is within the jurisdiction of the Los Angeles RWQCB.

Impacts related to water quality typically occur during three phases of a project: 1) during the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest; 2) following construction, prior to the establishment of ground cover, when the erosion potential may remain relatively high; and 3) following completion of the project, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

Construction

Remediation activities and project construction could result in short-term impacts to water quality due to the handling, storage, and disposal of construction materials, maintenance and operation of construction equipment, and earthmoving activities. Potential pollutants associated with these activities could damage downstream waterbodies. The proposed project would include two planning areas that encompass a 14.42-acre site. Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the SWRCB's *General Permit for Discharges of Stormwater Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ* (General Construction Permit). The General Construction Permit requires the project Applicant to prepare and implement a stormwater pollution prevention plan (SWPPP). The SWPPP would specify best management practices (BMPs) to be used during construction of the project. These BMPs would include measures to contain runoff from vehicle washing at the construction site, prevent sediment from disturbed areas from entering the storm drain system using structural controls (i.e., sandbags at inlets), and cover and contain stockpiled materials to prevent sediment and pollutant transport. Implementation of the BMPs would ensure runoff and discharges during the project's construction phase would not violate any water quality standards. Upon completion of the project, the Applicant would be required to submit a Notice of Termination to the SWRCB to indicate that construction has been completed.

According to the Geotechnical Report, regional groundwater is reported at approximately 95 feet below ground surface (bgs); however, some areas of seepage were encountered at the project site as part of the geotechnical investigation at depths ranging from 40 to 50 feet bgs. As such, dewatering could potentially be required should groundwater be encountered during project construction. 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.

Accordingly, compliance with the Construction General Permit and current NPDES permitting requirements for dewatering would reduce short-term construction-related impacts to water quality to a less than significant level.

Operations

The proposed project is subject to the Los Angeles County Department of Public Works requirements in the *2014 Low Impact Development (LID) Standards Manual* under the "development projects equal to one acre or greater of disturbed area and adding more than 10,000 square feet of impervious surface area" category. Further, Municipal Code Article V, Chapter 8, *Storm Water and Urban Runoff Pollution Control*, 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. Pursuant to Municipal Code Section 5809, *Storm Water Pollution Control Measures for New Development and Redevelopment Projects*, the proposed project would be required to implement 1) low impact development (LID) structural and non-structural BMPs; 2) source control BMPs, and 3) structural and non-structural BMPs for specific types of land uses in order to minimize operational impacts to water quality. To satisfy County and City requirements, a Standard Urban Stormwater Mitigation Plan (SUSMP) was prepared for the project.

Based on the SUSMP, project-specific system stormwater quality control measures and structural source measures would be implemented on-site, which includes modular wetlands biofiltration BMPs as stormwater treatment devices and a private underground storm drain system. The underground storm drain detention system has been designed for the 50-year 24-hour storm event. On-site stormwater runoff would flow away from the proposed buildings and into one of several low points across the site. Runoff would then flow through the proposed catch basins and collected into a private underground storm drain system. Modular wetland units would be placed next to the catch basin to treat runoff before entering the private storm drain system. Roof drainage would also be collected in the underground storm drain system. Runoff would be collected in a detention tank located on the north side of the project site before being released into the LA County Flood Control Torrance Lateral via the existing 15-inch channel connection at one of the County's existing stations. The detention system is designed to limit the discharge to a maximum allowable discharge rate of 1.52 cubic feet per acre (21.92 cubic feet per second [cfs] for the entire site) in accordance with County regulations. According to the Hydrology and Hydraulics Study, the 50-year peak flow rate with the proposed detention system would be 21.60 cfs, substantially lower than the undetained 50-year peak flow rate of 26.24 cfs. In addition to the proposed storm drain system, the project site would be graded to allow overland release during a larger storm event or if an inlet or storm drain becomes clogged.[1] The drainage area overland release points have been set below the finished floor elevation of the buildings, which would allow runoff discharge prior to ponding high enough to impact the buildings. Such discharge would ultimately flow to the northeast corner into South Main Street. Following compliance with project-specific BMPs, including the installation of the underground detention system and the modular wetland systems, long-term water quality impacts would be less than significant.

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?

Less Than Significant Impact. According to the Hydrology and Hydraulics Study, the existing landfill is capped with an impervious clay soil layer at or near the surface of the project site. The clay cap is designed to limit storm water infiltration due to the contents of the landfill material. Allowing water to infiltrate through the landfill material could contaminate groundwater. As a result, significant runoff occurs on-site. The project would decrease runoff volumes compared to existing conditions with the installation of the proposed on-site storm drain system, and no additional infiltration would occur. As a result, the project would not substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Further, the project site is not currently used for groundwater extraction or groundwater recharge purposes. As detailed in Section 4.19, *Utilities and Service Systems*, payment of standard water connection fees and ongoing user fees would ensure that sufficient water supplies are available. For these reasons, project implementation is not expected to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

[1] Underground storm drain systems are not designed to convey peak flow from infrequent high intensity storm events. When the pipes and inlets are clogged or overwhelmed, surface runoff will pond in low areas and flow overland along designed overland release routes. Thus, the project would include overland release routing on-site to minimize potential flooding.

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 be required to comply with the General Construction Permit requirements, which would reduce water quality impacts including erosion during construction to less than significant levels.

During project operations, the site would not include large areas of exposed soils that would be subject to runoff. Any unpaved areas would be improved with landscaping to minimize the potential for erosion or siltation on- or off-site; refer to Exhibit 2-5, *Conceptual Landscape Plan*. According to the Hydrology and Hydraulics Study, 50-year peak flow rates with the proposed detention system would be 21.60 cfs, substantially lower than the undetained condition of 26.24 cfs. Given the nature of the proposed use, the urbanized project setting, and the substantial increase in paved and landscaped areas, long-term operation of the project would not have the potential to result in substantial erosion or siltation. As stated in Response 4.10(a), the proposed project would also include modular wetlands biofiltration BMPs and an underground storm drain system in conformance with the SUSMP and Municipal Code Chapter 8 requirements in order to reduce long-term water quality impacts to less than significant levels. Thus, impacts in this regard would be less than significant.

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?

Less Than Significant Impact. Under existing conditions, surface runoff is currently contained within the site while the edge conditions drain off-site into County drain connections. As discussed above, the project would decrease on-site runoff volumes compared to existing conditions. Further, as noted in Section 2.4, *Project Characteristics*, and Response 4.10(a) above, development of the proposed project would install a new underground storm drain system on-site that would ultimately flow into the LA County Flood Control Torrance Lateral via the existing 15-inch channel connection at one of the County's existing station connections. Specifically, a detention tank would be installed in the north side of the project site. The detention system is designed to limit the discharge to a maximum allowable discharge rate of 1.52 cubic feet per acre (21.92 cfs for the site) in accordance with County regulations. According to the Hydrology and Hydraulics Study, the 50-year peak flow rate with the proposed detention system would be 19.19 cfs, substantially lower than the undetained condition of 26.24 cfs. In addition to the proposed storm drain system, the project site has also been graded to allow for overland release if the detention system reaches maximum capacity (21.92 cfs), potentially during a larger storm event or if an inlet or storm drain becomes clogged. The drainage area overland release points have been set below the finished floor elevation of the buildings, which would allow runoff discharge prior to ponding high enough to impact the buildings. Such discharge would ultimately flow to the northeast corner into South Main Street.

Based on the Hydrology and Hydraulics Study, runoff under the proposed detained condition would have a 50-year peak flow rate of approximately 21.60 cfs, well below the maximum allowed rate of 23.06 cfs under Los Angeles County Department of Public Works Design Division requirements. As the project would decrease surface flow volumes, and the proposed on-site storm drain system would meet County requirements, impacts concerning on- and off-site flooding would be less than significant.

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 discussed in Response 4.10(c)(2), the proposed project would reduce the volume of on-site surface runoff and the project's proposed underground storm drain system would ensure the project's 50-year peak flow rate (approximately 21.60 cfs) does not exceed the allowable peak flow rate provided by the Los Angeles County Department of Public Works Design Division for the site (21.92 cfs). Therefore, the proposed project is not anticipated to exceed the capacity of an existing or planned stormwater drainage system.

Further, as stated in Response 4.10(a), operations of the proposed project would adhere to existing NPDES requirements and would implement the operational BMPs and underground drainage and detention basins per the SUSMP in order to reduce long-term water quality impacts to less than significant levels. Therefore, project implementation is not anticipated to create or contribute to increased stormwater runoff 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(d).

Mitigation Measures: No mitigation is required.

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

No Impact. According to the Federal Emergency Management Agency (FEMA) map provided in the Hydrology and Hydraulics Study, the project site does not fall within a FEMA-mapped special flood hazard area. The project site is covered by FEMA Flood Insurance Rate Map (FIRM) Number 06037C1935F. The site is classified as Zone X, which is an area with a reduced risk of flooding due to a levee. As a result, no impacts would occur in this regard.

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 seven miles inland from the Pacific Ocean and thus, is at a sufficient distance so as not to be subject to tsunami impacts. No impacts would occur in this regard.

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, including 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 substantially increase water demands above existing conditions and would not substantially deplete groundwater supplies or interfere with groundwater recharge. As a result, the proposed project is not anticipated to conflict with or obstruct the projects or programs identified in the GBMP and no impact would occur.

Mitigation Measures: No mitigation is required.

[2] California Department of Water Resources, *SGMA Basin Prioritization Dashboard*, https://gis.water.ca.gov/app/bp-dashboard/p2/, accessed December 28, 2021.

[3] Water Replenishment District of Southern California, *Groundwater Basins Master Plan*, September 2016.

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 site is currently vacant, disturbed land, surrounded predominantly by industrial uses, and would itself, develop a business park campus that complements the adjacent existing industrial uses. Specifically, the proposed business park campus would accommodate a range of uses that include offices, research and development, e-commerce, and light industrial uses. The closest residential community is approximately 110 feet to the east, separated from the site by South Main Street; refer to Exhibit 2-2, *Site Vicinity*. Thus, project development would not physically divide an established community. 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

The City adopted an update to the General Plan on April 4, 2023, after this environmental document had been prepared but prior to its release. Based on the previous General Plan *Land Use Map*, adopted December 18, 2007, the project site was designated Mixed Use, Business Park (MU-BP). The MU-BP designation allowed for commercial, and business park/limited industrial uses. No residential uses were allowed. The updated General Plan (*Carson 2040 General Plan*) *Land Use Map* revised the project site designation to Flex District (FLX). The FLX designation permits a wide range of uses including offices, research and development, limited light-industrial uses, hotels, local and regional retail commercial uses, commercial entertainment uses, and gas/charging stations in mid- and high-intensity settings,

as well as residential uses in designated locations not including the project site. Under the FLX designation, warehousing/distribution/logistics facilities larger than 30,000 square feet are only permitted on the project site with approval of a development agreement. For the purposes of this environmental document, the prior land use designation of MU-BP is analyzed throughout. The Specific Plan would establish development standards for business park uses (Planning Area 1) and general commercial/retail uses (Planning Area 2); refer to Table 2-3, *Permitted Uses*. Permitted uses include retail/wholesale, e-commerce, light manufacturing, civic/institutional/educational, data center, and office uses, among others. As such, the proposed business park campus would be consistent with the permitted uses under the Specific Plan and the FLX land use designation.

Additionally, Table 4.11-1, *Project Consistency with Applicable General Plan Land Use Element Policies*, analyzes the project's consistency with applicable goals and policies in the General Plan Land Use Element.

Table 4.11-1
Project Consistency with Applicable General Plan Land Use Element Policies

Applicable General Plan Land Use Element Policies	Project Consistency Analysis
Policy LU-1.1: Continue to explore the opportunities associated with the establishment of a Brownfield Redevelopment Program.	Consistent. As discussed in Section 2.0, *Project Description*, the project site is located on disturbed land formerly part of the Gardena Valley Landfill. The project would remediate and redevelop the former landfill site into a regional industrial commerce center and retail/commercial development. As such, the project would redevelop an existing brownfield site within the City.
Policy LU-5.1: Coordinate Redevelopment and Planning activities and resources to maximize commercial opportunities.	Consistent. The project would remediate and redevelop a former landfill into a business park campus with facilities that can accommodate a range of uses that include offices, research and development, e-commerce and light industrial uses. Thus, the project site would revitalize the former landfill site with commercial opportunities.
LU-5.2: Implement and expand strategies to market, attract and/or retain retail commercial areas and encourage businesses to participate.	Consistent. The project would develop a retail/commercial component along Figueroa Street in combination with the primary industrial commerce center use; refer to Exhibit 2-3, *Conceptual Site Plan*. These additional retail/commercial uses would complement the City's existing inventory of tax-generating uses.
Policy LU-6.6: Attract land uses that generate revenue to the City of Carson, while maintaining a balance of other community needs such as housing, open space, and public facilities.	Consistent. Compared to existing conditions (i.e., vacant land), the proposed project would provide new locally serving retail commercial and regionally serving industrial and e-commerce uses which would generate revenue for the City.
LU-6.8: Manage truck-intensive uses.	Consistent. The proposed Specific Plan includes a Circulation Plan that provides standards and guidelines to ensure the safe and efficient movement of people and vehicles into and through the business park, addressing light trucks and passenger vehicles, heavy trucks, public transit, and non-vehicular circulation (pedestrians and bicycles). Thus, truck-intensive uses accommodated by the Specific Plan would be adequately managed through the implementation of the Circulation Plan.
LU-7.2: Locate truck intensive uses in areas where the location and circulation pattern will provide minimal impacts on residential and commercial uses.	Consistent. The project site is located in a predominately industrial area of Carson. Further, as discussed in Section 4.17, *Transportation*, the project would utilize two full access driveways along South Main Street on the eastern portion of the site and a third driveway along Figueroa Street at the southwestern corner of the site; refer to Exhibit 2-3. Refer to Section 2.0 for a description of the proposed vehicular and truck circulation options. Internal private drive aisles provide connections from perimeter streets to shared

Applicable General Plan Land Use Element Policies	Project Consistency Analysis
	parking areas, truck docks, and building entrances. Thus, truck intensive uses accommodated by the Specific Plan would provide minimal impacts on nearby commercial and residential uses.
LU-7.4: Through the discretionary review process, ensure that the siting of any land use which handles, generates, and/or transports hazardous substances will not negatively impact existing sensitive receptor land uses.	Consistent. As discussed in Section 4.3, *Air Quality*, the nearest sensitive receptors to the project site are residences located approximately 110 feet to the east, across South Main Street. The proposed project would comply with existing regulations, standards, and guidelines established by the U.S. Environmental Protection Agency (EPA), State, County of Los Angeles, and the City of Carson and related to the transport, use, and disposal of hazardous materials. The project would also comply with existing hazardous materials regulations, which are codified in California Code of Regulations Titles 8, 22, and 26, and their enabling legislations set forth in Health and Safety Code Chapter 6.95 as well as California Code of Regulations Title 49. Remediation activities proposed for the project would follow the Removal Action Work Plan, preliminarily approved by DTSC; refer to Section 2.4.1, *Site Remediation*. Further, the proposed project would be required to register with the County of Los Angeles Fire Department (LACoFD) and prepare a Risk Management Plan if large quantities of hazardous materials are stored and/or handled on-site and transported off-site. The Risk Management Plan would contain an off-site consequence analysis, a five-year accident history, an accident prevention program, an emergency response program, and a certification of the truth and accuracy of the submitted information regarding the use of hazardous materials on-site; refer to Section 4.9, *Hazards and Hazardous Materials*.
LU-7.5: Monitor existing uses, and carefully review all new proposals to expand intensive commercial and industrial uses.	Consistent. Surrounding existing land uses include a mixture of commercial, light industrial, and residential uses. The project proposes development of a business park campus with facilities that can accommodate a range of uses that include offices, research and development, e-commerce and light industrial uses in three structures totaling approximately 309,266-square feet in accordance with the proposed Specific Plan. The project also proposes development of a 4,000-square foot commercial building along Figueroa Street, which would be dedicated to retail uses. The proposed project plans and environmental review would be reviewed by the City of Carson staff and City Council as part of the project's discretionary review process.
Policy LU-12.3: Review landscape plans for new development to ensure that landscaping relates well to the proposed land uses, the scale of structures, and the surrounding area.	Consistent. Exhibit 2-4, *Conceptual Landscape Plan*, illustrates the project's conceptual landscape plan. The proposed project would provide new streetscape frontage layered with plant material along Figueroa Street, South Main Street, and the northern site perimeter. The conceptual landscape plan would provide a mixture of street and parking lot trees, shrubs, and groundcovers to provide a three-tiered screening approach to soften the massing of the on-site structures and provide a natural appearance along public corridors. Additionally, the conceptual landscape plan would be reviewed and approved by City staff during the plan check review process to ensure the proposed landscaping is consistent with the proposed development and surrounding area.
Policy LU-12.4: Amend the landscaping requirements in the Zoning Ordinance to enhance the appearance of the	Consistent. Refer to response to Policy LU-12.3.

Applicable General Plan Land Use Element Policies	Project Consistency Analysis
community and to provide for the use of trees to provide shade.	
Policy LU-12.5: Improve City appearance by requiring landscaping to screen, buffer and unify new and existing development. Mandate continued upkeep of landscaped areas.	Consistent. Refer to response to Policy LU-12.3. Additionally, as shown on Exhibit 2-5, the project would provide a variety of ornamental trees, shrubs, and ground cover. The street frontage along Figueroa Street and South Main Street and the northern site perimeter may be planted with eastern redbud trees, bronze loquat trees, Australian willow, crape myrtle trees, and fruitless olive trees, as well as a variety of drought tolerant ground cover and shrub masses (e.g., John Dourley manzanita, blue grama grass, Rosenka bougainvillea, sage-leaf rock rose, Spanish lavender, green cloud Texas ranger, deer grass, feathery cassia, smokey coast rosemary, and colorguard yucca). Planter pots ranging in plant variety, such as dragons blood trees, trialing rosemary, beaked yucca, donkey tail, little ollie, raspberry ice bougainvillea, New Zealand flax, trialing gazania, bitter aloe, and foxtail agave are proposed on-site. Overall, proposed landscaping would total approximately 29,705 square feet (six percent of the total site area) of shade-providing ornamental landscaping pursuant to the Specific Plan urban design guidelines.
Policy LU-13.4: Encourage architectural variation of building and parking setbacks along the streetscape to create visual interest, avoid monotony and enhance the identity of individual areas. Encourage pedestrian orientation by appropriate placement of buildings.	Consistent. Refer to response to Policies LU-12.3 and LU-12.5. The project would include a minimum 20-foot landscape buffer adjacent to Figueroa Street that incorporates a mixture of plant material to screen the proposed industrial buildings and create an attractive street frontage. Additionally, the project proposes a landscape buffer along South Main Street to complement the architecture of on-site buildings visible from the public right-of-way, including a mixture of new street trees, shrubs, and groundcover; refer to Policy LU-12.5.
Policy LU-13.5: Continue to require landscaping treatment along any part of a building site which is visible from City streets.	Consistent. Refer to response to Policies LU-12.3 and LU-12.5.
LU-14.2: Require new commercial or industrial development adjacent to and visible from freeways and freeway ramps to incorporate full architectural and landscape treatment of the building on the freeway side.	Consistent. Refer to response to Policies LU-12.3 and LU-12.5.
Policy LU-15.7: Provide for the efficient use of water through the use of natural drainage, drought tolerant landscaping, and use of reclaimed water, efficient appliances and water conserving plumbing fixtures.	Consistent. As described in the Specific Plan Urban Design Guidelines, sustainable design solutions which reduce energy consumption, use water efficiently, and minimize waste are encouraged. Conforming with guidelines provided in the Specific Plan would ensure consistency with Policy LU-15.7. Additionally, the project proposes to construct a storm drain system and multiple catch basins within the project's drive aisles, which would be pile supported due to the anticipated consolidation and decomposition of the landfill materials. Stormwater collected in the catch basins would flow to an existing 15-inch reinforced concrete pipe along the northern edge of the site that outlets to the Los Angeles County Flood Control Channel. An underground detention system would also be utilized to store on-site collected stormwater, which would similarly flow to the Los Angeles County Flood Control Torrance Lateral to the north.

Applicable General Plan Land Use Element Policies	Project Consistency Analysis
	The Specific Plan also requires energy and water-efficient appliances, fixtures, lighting, and windows that meet or exceed State energy performance standards (e.g., Energy Star qualified [or equivalent] models of mechanical equipment).
LU-15.8 Ensure that the street orientation, placement of buildings and the use of shading in existing and new developments contribute to the energy efficiency of the community.	Consistent. Refer to response to Policy LU-12.5.
Policy LU-16.2: Based on City priorities, determine whether a specific plan, redevelopment plan, urban design plan, streetscape improvement program, or other plan or program is appropriate for the identified area. The City should then embark upon such a study.	Consistent. The project proposes a Specific Plan to guide development on the project site. The proposed Specific Plan would be reviewed by City Staff and considered for adoption by the City Council.
Source: City of Carson, *Carson General Plan Land Use Element*, October 11, 2004.	

As analyzed in Table 4.11-1, the Specific Plan would be consistent with the applicable General Plan Land Use Element policies. As such, impacts in this regard would be less than significant.

Zoning Code Consistency

According to the *City of Carson Zoning Map*, the site is zoned Manufacturing Light with Organic Refuse Landfill Overlay and Design Review Overlay (ML-ORL-D). The project proposes a zone change to rezone the site from ML-ORL-D to Figueroa Street Business Park Specific Plan. Based on the Specific Plan, the project site is divided into Planning Area 1 and Planning Area 2. The consistency of the proposed business park campus to the Specific Plan development standards for Planning Areas 1 and 2 are analyzed in Table 4.11-2, *Specific Plan Development Standards Consistency Analysis*.

Table 4.11-2
Specific Plan Development Standards Consistency Analysis

Development Standard	Specific Plan Zoning Requirement	Proposed Project	Does Project Satisfy Requirement?
Maximum Floor Area Ratio	0.4	0.5	Yes[1]
Front Yard Setback	20 feet	25 feet (to Figueroa Street and Main Street)	Yes
Side and Rear Yard Setbacks	0 feet (when adjacent to non-residential uses)	60 feet (to southern site perimeter) and 52 feet (to northern site perimeter)	Yes
Space Between Buildings	Planning Area 1: 3 feet Planning Area 2: 6 feet	Planning Area 1: 120 feet (between Building 1 and Building 2); 51 feet (between Building 2 and Building 3) Planning Area 2: 80 feet (between Building 4 and Building 1)	Yes
Site Landscaping	Planning Area 1: 5 percent Planning Area 2: Not Applicable	Planning Area 1: 27,101 square feet (approximately 11 percent) Planning Area 2: 2,604 square	Yes

Development Standard	Specific Plan Zoning Requirement	Proposed Project	Does Project Satisfy Requirement?
		feet	
Building Height	Planning Area 1: No Maximum Building Height Planning Area 2: 30 feet	Planning Area 1: 48 feet Planning Area 2: 30 feet	Yes
Minimum Parking Spaces	Refer to Table 2-6, *Parking*, in Section 2.0, *Project Description*	399 spaces provided (395 spaces required)	Yes
Note: [1] Floor Area Ratio (FAR) of 0.5 is permitted with a City-approved development agreement and community benefits package. Source: City of Carson, *Figueroa Street Business Park Specific Plan Draft*, April 2023.			

Based on the analysis above, the business park campus would not conflict with the proposed Specific Plan development standards. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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 California Department of Conservation, no areas within the City have been identified as containing significant mineral aggregate resources.[1,2] As such, 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, *Special Report 143: Part IV Mineral Land Classification of the Greater Los Angeles Area, Part IV Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region*, 1982.

[2] California Department of Conservation, *Special Report 209: Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in The San Gabriel Valley Production-Consumption Region, Los Angeles County, California*, 2010.

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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 3 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 3 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 3 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. Similarly, Community Noise Equivalent Level (CNEL) is a measure of 24-hour noise levels that incorporates a 5-dBA penalty for sounds occurring between 7:00 p.m. and 10:00 p.m. and a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

REGULATORY FRAMEWORK

Local

Carson General Plan

The Carson General Plan (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 the City.

Table 4.13-1
Interior and Exterior Noise Standards

Land Use Categories		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*, October 11, 2004.

City of Carson Municipal Code

Chapter 5 of the City of Carson Municipal Code (Municipal Code) contains noise control regulations. The City adopted the "Noise Control Ordinance of the County of Los Angeles" 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 — Citations for Violations Authorized When*, and Section 12.08.400, *Interior Noise Standards*, establishes exterior and interior noise standards to regulate operational 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 Residential	10:00 p.m. to 7:00 a.m.	—	40
		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,* Sections 12.08.390 and 12.08.400, current through Ordinance 2022-0050, updated December 1, 2022.

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, *Carson Municipal Code*, Section 5502(c), current through Ordinance No. 21-2188, passed September 21, 2021.

Municipal Code Section 5502(d), *Amendments to Noise Control Ordinance*, prohibits loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, garbage cans or similar objects between the hours of 9:00 p.m. and 7:00 a.m. in such a manner as to cause noise disturbance.

Additionally, Municipal Code Section 5502(b) states that exterior noise standards plus 20 dBA shall be the daytime and nighttime exterior noise standards for noise that occur for a cumulative period of no more than 2.5 minutes in any 30-minute period.

EXISTING CONDITIONS

Stationary Sources

Noise sources in the project area include the use of mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units) and parking lot noise (e.g., cars parking, open and closing doors, and truck back-up beepers) associated with light industrial, commercial, and residential land uses surrounding the project site. The noise associated with these sources may represent a single-event noise occurrence, short-term, or long-term/continuous noise.

Mobile Sources

The majority of the existing noise in the project area is generated from vehicle sources along South Main Street and Figueroa Street. According to the General Plan, traffic noise levels along South Main Street and Figueroa Street range from 60 to 70 dBA CNEL.[1] Additionally, aircraft overflights and trains are a source of noise in the City.

Noise Measurements

In order to quantify existing ambient noise levels in the project area, Michael Baker International (Michael Baker), conducted two short-term noise measurements on August 12, 2021; refer to Table 4.13-4, *Noise Measurements*. The noise measurement sites are representative of typical existing noise exposure within and immediately adjacent to the project site. The two, ten-minute measurements were taken between 10:00 a.m. and 11:00 a.m. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day and relate closely with the noise standards for the project area.

Table 4.13-4
Noise Measurements

Site No.	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Peak (dBA)	Time
1	Left side of the entrance of Vista De Loma at 20600 South Main Street.	69.2	84.7	44.8	102.5	10:22 a.m.
2	In front of the Ministerios Internacional El Buen Samaritano church, along the south boundary of the project site.	61.0	66.8	57.4	92.3	10:45 a.m.

Source: Michael Baker International, August 12, 2021.

Meteorological conditions were cloudy, cool temperatures, with light wind speeds (0 to 5 miles per hour), and low humidity. Measured noise levels during the daytime measurements ranged from 61.0 to 69.2 dBA L_{eq}. The sources of peak noise are traffic along South Main Street, Figueroa Street, and I-110. Noise monitoring equipment used for the ambient noise survey consisted of a Brüel & Kjær Hand-held Analyzer Type 2250 equipped with a Type 4189 pre-polarized microphone. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for sound level meters. The results of the field measurements are included in Appendix F, *Noise Data*.

Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential

[1] City of Carson, *Carson General Plan*, Exhibit N-4, Future Noise Contours (2020), October 11, 2004.

dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest sensitive receptors are mobile homes and multi-family residential uses located approximately 110 feet east of the project site across South Main Street. Additionally, a church (Ministerios Internacional El Buen Samaritano) is located approximately 110 feet to the south of 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 With Mitigation Incorporated. 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. Potential noise-reducing measures can include limiting construction hours, staging construction equipment away from sensitive receptors, installing sound walls or noise barriers, and substituting construction equipment, where feasible, among other measures.

CONSTRUCTION

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., grading, building construction, paving, and architectural coatings). Noise generated by construction equipment, including graders and excavators, can reach high levels. During construction, exterior noise levels could affect residential uses in the vicinity of the project site. Specifically, project construction could occur as close as approximately 110 feet from existing mobile homes and multi-family residences to the east of the project site.

The project involves remediation and construction activities associated with grading, building construction, paving, and architectural coatings. Earthwork activities would require approximately 29,000 cubic yards of cut and approximately 11,000 cubic yards of fill, which would result in approximately 18,000 cubic yards of export. Additionally, there would be 12 cubic yards soil export during remediation, resulting in a total of 18,012 cubic yards soil export.

Construction noise is difficult to quantify because of the many variables involved, including the specific equipment types, size of equipment used, percentage of time each piece is in operation, condition of each piece of equipment, and number of pieces that would operate on the site. Construction equipment produce maximum noise levels when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites typically operates under less than full power conditions, or part power. To characterize construction-period noise levels more accurately, the average (L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment simultaneously operating on part power. The estimated construction noise levels at the nearest noise-sensitive receptors are presented in Table 4.13-5, *Construction Noise Levels at Adjacent Residential Receptors*. The modeling results are included in Appendix F. To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all heavy construction equipment (e.g., graders, excavators, and scrapers) were assumed to operate simultaneously and be located at the construction area nearest to the affected receptors.

Table 4.13-5
Construction Noise Levels at Adjacent Residential Receptors

Nearest Sensitive Receptor to Project Site	Construction Phase	Estimated Exterior Construction Noise Level (dBA L_{eq})[1]	Estimated Exterior Construction Noise Level (dBA L_{eq}) with Mitigation[2]	Construction Noise Standard (dBA L_{eq})	Exceeds Standards with Mitigation?
Eastern Residences (approximately 110 feet)	Grading	82.2	62.2	70	**No**
	Building Construction	80.2	60.2		**No**
	Paving	78.3	58.3		**No**
	Architectural Coating	66.8	46.8		**No**

Notes:
1. These noise levels conservatively assume the simultaneous operation of all heavy construction equipment (e.g., graders, excavators, and scrapers) at the same precise location.
2. Project estimated exterior construction noise levels with mitigation include a sound reduction of 20 dBA from Mitigation Measure NOI-2.

Source: Federal Highway Administration, *Roadway Construction Noise Model (RCNM)*, 2006 (see Appendix F).

As depicted in Table 4.13-5, adjacent residential receptors could be exposed to temporary and intermittent noise levels up to 82.2 dBA, which exceeds the City's construction noise standard of 70 dBA for multi-family residences. As previously noted, noise levels presented in Table 4.13-5 are conservative, as these noise levels assume the simultaneous operation of all heavy construction equipment (e.g., graders, excavators, and scrapers) at the same precise location. In reality, construction equipment would be used throughout the project site and would not be concentrated at the point closest to the sensitive receptors. It should also be acknowledged that construction activities would occur during normal daytime hours (between 7:00 a.m. and 8:00 p.m.) to avoid noise disturbances at nearby receptors during the more sensitive hours (between 8:00 p.m. and 7:00 a.m.) on weekdays. No construction activities would occur on Sundays or legal holidays.

Noise source control is the most effective method of controlling construction noise. Source controls, which limit noise, are the easiest to oversee on a construction project. Mitigation at the source reduces the problem everywhere, not just along one single path or for one receiver. Noise path controls are the second method in controlling noise. Barriers or enclosures can provide a substantial reduction in the nuisance effect in some cases. Path control measures include moving equipment farther away from the receiver; enclosing especially noisy activities or stationary equipment; erecting noise enclosures, barriers, or curtains; and using landscaping as a shield and dissipater.

Noise barriers or enclosures can provide a sound reduction up to 20 dBA or greater.[2] To be effective, a noise enclosure/barrier must physically fit in the available space, must completely break the line-of-sight between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source and extend length-wise and vertically as far as feasibly possible to be most effective. The limiting factor for a noise barrier is not the component of noise transmitted through the material, but rather the amount of noise flanking around and over the barrier. In these cases, the enclosure/barrier system must either be very tall or have some form of roofed enclosure to protect upper-story receptors.

[2] Echo Barrier, *H9 Acoustic Barrier*, https://cdn2.hubspot.net/hubfs/3882358/Current%20Spec%20Sheets/US%20spec%20sheets/Echo+Barrier+H9+Product+Specification+Sheet+US.pdf?__hstc=142594029.328a8c029c1473d436adaac1ede62776.1605573497439.1605573497439.1605573497439.1&__hssc=142594029.2.1605573497440&__hsfp=1026759523, accessed August 3, 2022. Although the barrier could provide 43 dBA noise reduction under laboratory test, as a conservative analysis, it is assumed that 20 dBA noise reduction would be achieved in actual settings.

To ensure compliance with the City's maximum construction noise limits (outlined in Municipal Code Section 5502[c]) and substantially reduce construction-generated noise at nearby receptors, the proposed project would be required to implement Mitigation Measures NOI-1 and NOI-2. Mitigation Measure NOI-1 would include the designation of a "Noise Disturbance Coordinator" and orientation of stationary construction equipment away from nearby sensitive receivers, among other requirements. Further, as shown in Table 4.13-5, implementation of Mitigation Measure NOI-2 would reduce the project's construction noise levels to below the City's 70 dBA standard with the use of a temporary noise barrier or enclosure along the southern property line to break the line-of-sight between the construction equipment and the adjacent residences. Therefore, project construction activities would not generate noise levels in excess of City standards with implementation of Mitigation Measures NOI-1 and NOI-2. A less than significant impact would occur in this regard.

OPERATIONS

Off-Site Mobile Noise

Future development generated by the proposed project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the vicinity of existing and proposed land uses. According to the Highway Traffic Noise Analysis and Abatement Policy and Guidance, a doubling of traffic volumes would result in a 3 dB increase in traffic noise levels, which is barely detectable by the human ear.[3] According to the *Traffic Impact Study for Figueroa Street Business Park Project in the City of Carson* (Transportation Impact Analysis) prepared by Kimley Horn (dated October 2022), the proposed project would generate approximately 823 total daily trips between the warehouse, manufacturing, and commercial/retail uses.

According to Table 4.13-6, *Existing Conditions Traffic Noise Levels*, under the "Existing" scenario, noise levels at a distance of 100 feet from the roadway centerline would range from approximately 58.8 dBA to 64.7 dBA, with the highest noise levels occurring along South Main Street between Del Amo Boulevard and Torrance Boulevard. The "Existing With Project" scenario noise levels at a distance of 100 feet from the roadway centerline would range from approximately 58.9 dBA to 64.8 dBA, with the highest noise occurring along the same roadway segment. As shown in Table 4.13-6, the noise levels would result in a maximum increase of 0.1 dBA as a result of the proposed project. As this noise level increase is below 3.0 dBA[4], a less than significant impact would occur in this regard.

[3] U.S. Department of Transportation, *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, updated August 24, 2017, https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm, accessed August 3, 2022.

[4] According to the California Department of Transportation's Traffic Noise Analysis Protocol, dated May 2011, a 3.0 dB difference in noise level is generally the point at which the human ear will perceive a difference in noise level. As such, 3.0 dB is considered a conservative and reasonable threshold of significance, as the City of Carson does not have an established threshold in this regard.

Table 4.13-6
Existing Conditions Traffic Noise Levels

Roadway Segment	Existing					Existing With Project					Difference in dBA @ 100 Feet from Roadway
	ADT	dBA @ 100 Feet from Roadway Centerline	Distance from Roadway Centerline to: (Feet)			ADT	dBA @ 100 Feet from Roadway Centerline	Distance from Roadway Centerline to: (Feet)			
			70 CNEL Noise Contour	65 CNEL Noise Contour	60 CNEL Noise Contour			70 CNEL Noise Contour	65 CNEL Noise Contour	60 CNEL Noise Contour	
Del Amo Boulevard											
Hamilton Ave to Figueroa St	18,210	63.0	-	73	158	18,390	63.0	74	159	343	0.0
Figueroa Street to Main St	23,370	64.3	-	90	194	23,719	64.4	91	196	423	0.1
Torrance Boulevard											
Hamilton Ave to Figueroa St	22,810	63.8	-	84	180	23,074	63.9	84	182	391	0.0
Figueroa Street to Main St	14,370	61.9	-	62	134	14,643	62.0	63	136	293	0.1
Hamilton Avenue											
Del Amo Blvd to I-110 SB Ramps	9,720	58.8	-	-	84	9,798	58.9	-	84	181	0.0
I-110 SB Ramps to Torrance Blvd	10,670	59.2	-	-	89	10,866	59.3	-	90	194	0.1
Figueroa Street											
Del Amo Blvd to I-110 NB Ramps	18,240	63.0	-	73	158	18,599	63.1	74	160	345	0.1
I-110 NB Ramps to Torrance Blvd	20,270	63.5	-	79	170	20,630	63.5	80	172	370	0.1
South Main Street											
Del Amo Blvd to Torrance Blvd	20,630	64.7	-	96	206	20,970	64.8	97	209	450	0.1

Notes: ADT = average daily trips; dBA = A-weighted decibels; CNEL = community noise equivalent level; - = Contour located within the roadway right of way.

Source: Based on traffic data within the *Traffic Impact Study for Figueroa Street Business Park Project, In the City of Carson* prepared by Kimley-Horn and Associates, Inc., dated October 2022.

Cumulative Mobile Source Impacts

A project's contribution to a cumulative traffic noise increase would be considered significant when the combined effect exceeds perception level (i.e., auditory level increase) threshold. The combined effect compares the "Cumulative With Project" condition to "Existing" conditions. This comparison accounts for the traffic noise increase generated by a project combined with the traffic noise increase generated by ambient growth and related projects in the project vicinity. The following criterion has been utilized to evaluate the combined effect of the cumulative noise increase.

- Combined Effects. The cumulative with project noise level ("Cumulative With Project") would cause a significant cumulative impact if a 3.0 dB increase over existing conditions occurs and the resulting noise level exceeds the applicable exterior standard at a sensitive use.

Although there may be a significant noise increase due to the proposed project in combination with other related projects (combined effects), it must also be demonstrated that the project has an incremental effect. In other words, a significant portion of the noise increase must be due to the proposed project. The following criterion has been utilized to evaluate the incremental effect of the cumulative noise increase.

- Incremental Effects. The "Cumulative With Project" causes a 1.0 dBA increase in noise over the "Cumulative Without Project" noise level.

A significant impact would result only if both the combined and incremental effects criteria have been exceeded. Noise by definition is a localized phenomenon and reduces as distance from the source increases. Consequently, only the proposed project and growth due to occur in the project site's general vicinity would contribute to cumulative noise impacts. Table 4.13-7, *Cumulative Traffic Noise Levels*, provides traffic noise effects along roadway segments in the project vicinity for "Existing," "Cumulative Without Project," and "Cumulative With Project" conditions, including combined and incremental

cumulative impacts. As indicated in Table 4.13-7, although noise levels would exceed the combined effects criterion of 3.0 dBA along two roadway segments (Del Amo Boulevard, from Figueroa Street to South Main Street; and Hamilton Avenue, from Del Amo Boulevard to I-110 South Bound Ramps), the incremental effects criterion of 1.0 dBA would not be exceeded along any roadway segments. Therefore, there would not be any roadway segments that would be subject to significant cumulative impacts, as they would not exceed both the combined and incremental effects criteria. Therefore, the proposed project, in combination with cumulative background traffic noise levels, would result in less than significant cumulative impacts.

Table 4.13-7
Cumulative Traffic Noise Levels

Roadway Segment	Existing	Cumulative Without Project	Cumulative With Project	Combined Effects	Incremental Effects	Cumulatively Significant Impact?
	dBA @ 100 Feet from Roadway Centerline	dBA @ 100 Feet from Roadway Centerline	dBA @ 100 Feet from Roadway Centerline	Difference In dBA Between Existing and Cumulative With Project	Difference in dBA Between Cumulative Without Project and Cumulative With Project	
Del Amo Boulevard						
Hamilton Ave to Figueroa St	63.0	65.7	65.7	2.7	0.0	***No***
Figueroa Street to Main St	64.3	67.3	67.3	3.0	0.0	***No***
Torrance Boulevard						
Hamilton Ave to Figueroa St	63.8	64.5	64.5	0.7	0.0	***No***
Figueroa Street to Main St	61.9	63.3	63.4	1.5	0.1	***No***
Hamilton Avenue						
Del Amo Blvd to I-110 SB Ramps	58.8	62.3	62.3	3.5	0.0	***No***
I-110 SB Ramps to Torrance Blvd	59.2	60.2	60.3	1.1	0.1	***No***
Figueroa Street						
Del Amo Blvd to I-110 NB Ramps	63.0	64.5	64.6	1.6	0.1	***No***
I-110 NB Ramps to Torrance Blvd	63.5	64.1	64.2	0.7	0.1	***No***
South Main Street						
Del Amo Blvd to Torrance Blvd	64.7	67.3	67.4	2.6	0.0	***No***
Notes: ADT = average daily trips; dBA = A-weighted decibels; CNEL = community noise equivalent level.						
Source: Based on traffic data within the *Traffic Impact Study for Figueroa Street Business Park Project, In the City of Carson* prepared by Kimley-Horn and Associates, Inc., dated October 2022.						

On-Site Operational Noise

Mechanical equipment, slow-moving trucks, back-up alarms for trucks, and parking lot activities would generate noise during on-site operations. The operations would be typical of a distribution/warehousing/manufacturing facility.

Mechanical Equipment

HVAC units would be installed on the roof of the proposed warehouse building. Typically, mechanical equipment, such as HVAC units, generate noise levels of 55 dBA at 50 feet from the source.[5] Noise generated by stationary sources typically attenuates at a rate of 6 dBA per doubling of distance from the source. The closest HVAC units would be located on Building 3 approximately 185 feet from the nearest residences to the east of the project site and on Building 1 approximately 185 feet from the church to the south of the project site. As such, noise levels from the HVAC units could reach approximately 44 dBA at the nearest residences to the south and the church to the south without an enclosure or noise attenuation features. However, the HVAC units would be shielded by parapets which would further

[5] U.S. Environmental Protection Agency, Noise From Construction Equipment and Operations, Building Equipment, and Home Appliances, December 1971.

attenuate operation noise from HVAC units. The parapets would provide a minimum attenuation of 5 dBA from HVAC noise, resulting in an exterior noise level of approximately 39 dBA.[6] Therefore, operation of the HVAC units would not exceed the City's daytime (50 dBA) and nighttime (45 dBA) noise standards for residential uses or the City's daytime (60 dBA) and nighttime (55 dBA) noise standards for commercial uses. Impacts would be less than significant in this regard.

Slow-Moving Trucks

On-site truck operations would be considered a mobile noise source subject to the City's noise regulations. It is anticipated that the project would operate from 8:00 a.m. through 5:00 p.m., Monday through Friday, which truck deliveries occurring during the same time. The predominant noise source during on-site operations would be from on-site truck movements and idling. Typically, slow movements from these trucks can generate a maximum noise level of approximately 79 dBA at a distance of 50 feet.[7]

For the purposes of this analysis, the distance to the nearest receptor was measured from the closest on-site truck-movement area (located along southern and eastern project site boundaries) to the property lines of the receptors being analyzed. The closest on-site truck-movement area would be located approximately 135 feet from the nearest residences to the east of the project site and approximately 115 feet from the church to the south of the project site. At these distances, on-site noise levels from slow-moving trucks would be approximately 70 dBA at the residences and 72 dBA at the church. It should be noted that trucks would only move along the access road and therefore would not generate noise for an extended period of time. In addition, according to the Transportation Impact Analysis, the project would generate 141 truck trips per day. Therefore, it is reasonable to assume that noise from slow-moving trucks along the access road located on the south side of the project site would not exceed five minutes in an hour. According to Municipal Code Section 5502, 20 dBA shall be added to the daytime and nighttime exterior noise standards for a cumulative period of no more than 2.5 minutes in any 30-minute period. The anticipated noise levels from slow-moving trucks (70 dBA at the residences and 72 dBA at the church) would not exceed the City's adjusted daytime noise standards for residential uses (70 dBA) or commercial uses (80 dBA). In addition, traffic noise along South Main Street would partially mask noise from slow-moving trucks. Therefore, a less than significant impact would occur in this regard.

Back-Up Alarms

A total of 38 truck loading docks (12 loading docks for Building 1, 11 loading docks for Building 2, and 15 loading docks for Building 3), three grade doors (one grade door for each building [Buildings 1-3]), and six trailer stalls (two trailer stalls for each building [Buildings 1-3]) are proposed on-site. Medium- and heavy-duty trucks reversing into truck loading docks would produce noise from back-up alarms (also known as back-up beepers). Back-up beepers produce a typical volume of 97 dBA at one meter (i.e., 3.28 feet) from the source.[8] The property lines of the nearest residences to the east of the project site would be located approximately 396 feet east of the truck loading docks of Building 3 where trucks would be reversing/parking. At this distance, exterior noise levels from back-up beepers would be approximately 55.4 dBA. In addition, a portion of Building 3 would block the line-of-sight between the residences and the loading docks and provide a minimum attenuation of 15 dBA[9] from back-up beeper noise, resulting in an exterior noise level of approximately 40.4 dBA. Therefore, the anticipated noise levels from back-up beepers would not exceed the City's daytime (50 dBA) noise standard for residential uses. The property line of the church to the south of the project site would be located approximately 270 feet south of the truck loading docks of Building 1 where trucks would be reversing/parking. At this distance, exterior noise levels from back-up beepers would be approximately 59 dBA. In addition, Building 1 would block the line-of-sight between the residences and the loading docks and provide a minimum

6 Federal Highway Administration, *Roadway Construction Noise Model User's Guide Appendix A*, January 2006.
7 Elliot H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010.
8 Environmental Health Perspectives, *Vehicle Motion Alarms: Necessity, Noise Pollution, or Both?* https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3018517/, accessed May 11, 2021.
9 Federal Highway Administration, *Roadway Construction Noise Model User's Guide Appendix A*, January 2006.

attenuation of 15 dBA[10] from back-up beeper noise, resulting in an exterior noise level of approximately 44 dBA. Therefore, the anticipated noise levels from back-up beepers would not exceed the City's daytime (60 dBA) noise standard for commercial uses. In addition, in compliance with Municipal Code Section 5502(d), loading and unloading operations would only occur between the hours of 7:00 a.m. and 9:00 p.m. Thus, noise impacts from back-up beepers associated with the project would be less than significant.

Parking Areas

A total of 399 parking spaces would be provided for employees and visitors in surface parking areas along building and site perimeters. Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to nearby noise-sensitive receptors. Estimates of the maximum noise levels associated with some parking lot activities are presented in Table 4.13-8, *Typical Maximum Noise Levels Generated by Parking Lots*.

Table 4.13-8
Typical Maximum Noise Levels Generated by Parking Lots

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	61 dBA L_{eq}
Car starting	60 dBA L_{eq}
Car idling	53 dBA L_{eq}
Source: Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.	

As shown in Table 4.13-8, parking lot noise levels would range between 53 dBA and 61 dBA at a distance of 50 feet. The property lines of the nearest residences to the east of the project site would be located approximately 275 feet east of the nearest proposed parking area on eastern portion of the project site. The property line of the church to the south of the project site would be located approximately 135 feet south of the nearest proposed parking area on southern portion of the project site. At these distances, parking lot noise levels would range between 45 dBA and 53 dBA at the nearest residences and range between 44 dBA and 52 dBA at the church. According to Municipal Code Section 5502, exterior noise levels exceeding the daytime or nighttime noise standards for a cumulative period of 15 minutes in any 30-minute period would exceed the City's noise standard. As parking lot noise is temporary and short in duration, it is not anticipated the parking lot activities would exceed 15 minutes in duration in any 30-minute period. A less than significant impact would occur in this regard.

Mitigation Measures:

NOI-1 To reduce noise levels during construction activities, the project Applicant shall demonstrate, to the satisfaction of the City of Carson Community Development Director, that the project complies with the following:

- Construction contracts shall specify that all construction equipment, fixed or mobile, are equipped with properly operating and maintained mufflers and other State-required noise attenuation devices.

- A sign, legible at a distance of 50 feet, shall be posted at the project construction site providing a contact name and a telephone number where residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator shall be identified to address construction noise

[10] Ibid.

concerns received. The coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City. All signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator.

- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.

- Per Section 5502 (c) of the *Carson Municipal Code*, construction shall be limited to the hours between 7:00 a.m. and 8:00 p.m. daily (except Sundays and legal holidays). All construction activities shall be prohibited at night (between 8:00 p.m. and 7:00 a.m.) and on Sundays and legal holidays.

NOI-2 Prior to grading permit issuance, the project Applicant shall demonstrate, to the satisfaction of the City of Carson Building Official, that the construction plans require a temporary noise barrier or enclosure during all phases of construction that meets the following conditions:

- The temporary noise barrier or enclosure shall be used along the eastern property line to break the line-of-sight between the construction equipment and the sensitive receptors to the east of the project site.

- The temporary noise barrier shall have a sound transmission class (STC) of 20 or greater in accordance with American Society for Testing and Materials Test Method E90, or at least 2 pounds per square foot to ensure adequate transmission loss characteristics. In order to achieve this, the barrier may consist of 3-inch steel tubular framing, welded joints, a layer of 18-ounce tarp, a 2-inch-thick fiberglass blanket, a half-inch-thick weatherwood asphalt sheathing, and 7/16-inch sturdy board siding with a heavy duct seal around the perimeter.

- The Contractor shall ensure the length, height, and location of noise control barrier walls are adequate to assure proper acoustical performance. This shall be achieved by the following requirements:

    - The noise control barrier must physically fit in the available space, must completely break the line-of-sight between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source and extend length-wise and vertically as far as feasibly possible to be most effective.

- In addition, to avoid objectionable noise reflections, the source side of the noise barrier shall be lined with an acoustic absorption material meeting a noise reduction coefficient rating of 0.70 or greater in accordance with American Society for Testing and Materials Test Method C423. All noise control barrier walls shall be designed to preclude structural failure due to such factors as winds, shear, shallow soil failure, earthquakes, and erosion.

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

Less Than Significant Impact With Mitigation Incorporated. 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 California Department of Transportation (Caltrans) *Transportation and Construction Vibration Manual* identifies various vibration damage criteria for different building classes. As the nearest structure is a light industrial building located approximately 30 feet to the south of project construction activities, the architectural damage criterion for continuous vibrations at modern industrial/commercial buildings of 0.3 inch-per-second peak particle velocity (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. Typical vibration produced by construction equipment is illustrated in Table 4.13-9, *Typical Vibration Levels for Construction Equipment*.

Table 4.13-9
Typical Vibration Levels for Construction Equipment

Equipment		Approximate peak particle velocity at 25 feet (inch/sec)	Approximate peak particle velocity at 30 feet (inch/sec)[1]	Approximate peak particle velocity at 75 feet (inch/sec)[1]
Pile driver (impact)	Upper range	1.518	1.515	0.292
	Typical	0.644	0.490	0.124
Pile driver (sonic)	Upper range	0.734	0.558	0.141
	Typical	0.170	0.129	0.033
Large bulldozer		0.089	0.068	0.017
Loaded trucks		0.076	0.058	0.015
Jackhammer		0.035	0.027	0.007
Small bulldozer		0.003	0.002	0.001

Notes:
1. Calculated using the following formula:
$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$
where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Guidelines*
D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual, Table 7-4 Vibration Source Levels for Construction Equipment*, September 2018.

Groundborne vibration decreases rapidly with distance. As construction is proposed up to the project property lines, the nearest structure is located approximately 30 feet south of the of the proposed construction area. As indicated in Table 4.13-9, vibration velocities from typical heavy construction equipment used during project construction would range from 0.002 to 1.515 in/sec PPV at 30 feet from the source of activity, which would exceed the FTA's 0.3 in/sec PPV threshold, due to the use of pile drivers. Therefore, Mitigation Measure NOI-3 would be required to reduce vibration velocities to below the FTA's 0.3 in/sec PPV threshold. Mitigation Measure NOI-3 would require the use of small sonic pile drivers, as an alternative to impact pile drivers, within 75 feet of the southern industrial structures to ensure vibration levels do not exceed the 0.3 inch/sec PPV significance threshold. As shown in Table 4.13-9, vibration levels would not exceed the 0.3 inch/sec PPV significance threshold at 75 feet from the source of activity. Therefore, impacts would be less than significant with implementation of Mitigation Measure NOI-3.

Mitigation Measures:

NOI-3 Prior to issuance of a grading permit, the project Applicant shall prepare a grading control plan to ensure that project-related grading activities do not result in damage to off-site southern light industrial structures. The grading control plan shall be subject to the City of Carson Building and Safety Department's approval prior to

issuance of a grading permit. To reduce groundborne vibration levels, the grading control plan shall stipulate that small sonic pile drivers are used as an alternative to impact pile drivers within 75 feet of the off-site southern light industrial structures.

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 3.5 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. Additionally, the project site is not located within the vicinity of a private airstrip or related facilities.[11] Therefore, project implementation would not expose people residing or working in the project area to excessive noise levels associated with aircraft. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

[11] The Goodyear Blimp Airship Base, situated approximately 0.6 mile to the northeast of the project site, is not considered an airport as blimp operations are infrequent compared to aircraft activity at airports, and produce much lower sound levels than traditional aircrafts.

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)?

Less Than Significant Impact. A project could induce population growth in an area, either directly (for example, by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure). No residential uses would be developed as part of the project. Therefore, the project would not induce direct population growth in the City through new housing development.

As described in Section 2.0, *Project Description*, the project involves the construction of a new business park facility on a project site that is currently vacant. The employment generated by the proposed project could result in future employees (and their families) relocating into the City and resulting in direct population growth. Estimating the number of future employees who would choose to relocate to the City would be speculative given that many factors influence personal housing location decisions (e.g., family income levels and the cost and availability of suitable housing in the local area).

The project is expected to generate approximately 353 employees; refer to Table 4.14-1, *Project-Generated Jobs*.[1] Based on a conservative estimate of all 353 employees and their families relocating to Carson and the City's average household size of 3.35, project implementation could result in a population increase of up to 1,183 persons.[2] Based on this information, population growth associated with the project would represent only a 1.3 percent increase above the City's estimated 2022 population of 92,362 persons.[3]

1 The Natelson Company, Inc, *Employment Density Study Summary Report*, October 31, 2001.
2 State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2021-2022, with 2020 Benchmark*, Sacramento, California, May 2022.
3 Ibid.

Table 4.14-1
Project-Generated Jobs

Land Use	Buildout (square feet)	Square Feet Per Employee Rate	Project-Generated Jobs
Planning Area 1			
Low-Rise Office	49,800	319	156
Light Manufacturing	29,127	829	35
Warehouse	230,339	1,518	152
		Subtotal	*343*
Planning Area 2			
Other Retail/Svc.	4,000	424	10
		Subtotal	*10*
		TOTAL JOBS	**353**
Notes: Jobs are rounded to the nearest whole number.			
Source: The Natelson Company, Inc, *Employment Density Study Summary Report*, Table II-B pg.6, October 31, 2001.			

Potential population growth impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint. The Southern California Association of Governments (SCAG) growth forecasts estimate the City's population to reach 105,200 persons by 2040, representing a total increase of 11,600 between 2016 and 2040.[4] SCAG's regional growth forecasts are based upon long-range development assumptions (i.e., General Plans) of the relevant jurisdiction. The project's anticipated population increase (1,253 persons) would represent approximately 10.8 percent of the City's anticipated population growth by 2040, or 1.0 percent of the City's projected population by 2040.

Although the project would result in direct population growth, the proposed project would not induce substantial unplanned population growth exceeding existing local conditions (1.4 percent increase) or regional populations projections (1.0 percent of the City's total projected 2040 population). As such, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

No Impact. The proposed project would not result in the demolition of existing residences; therefore, project implementation would not displace any existing housing or persons. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

[4] Southern California Association of Governments, *2020-2045 RTP/SCS Technical Report, Demographics and Growth Forecast,* September 3, 2020.

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?

Less Than Significant Impact. The County of Los Angeles Fire Department (LACoFD) provides fire protection services to the City and project site. As stated in the General Plan Community Services, Education, and Safety Element, 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 site is Station #36, located approximately one mile to the south at 127 West 223rd Street within the City.

The proposed project would create an increased demand for fire protection services. The project would generate approximately 353 jobs. Based on a conservative assumption that all 353 employees would relocate to Carson for employment and an average household size of 3.35, the project could introduce up to 1,183 persons to the City; refer to Section 4.14, *Population and Housing*. The site is already within the existing service area of LACoFD. Furthermore, the project would adhere to Municipal Code Article XI, *Interim Development Impact Fees*, which requires payment of fees to offset project impacts on existing public facilities or demands for new facilities, including fire protection services. Moreover, the overall project design would be subject to compliance with the requirements set forth in the most current California Fire Code (CFC), California Building Standards Code (CBC), and the Municipal Code, *Chapter 1 Building Code*, and LACoFD requirements. Compliance with existing regulations and payment of development impact fees would reduce potential fire hazards associated with the new development and impacts on existing LACoFD resources. As such, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

2) Police protection?

Less Than Significant 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 1.6 miles to the southeast of the site at 21356 South Avalon Boulevard.

Implementation of the project would increase demand for police protection services provided by the LASD. As discussed in Response 4.15 (a)(1) above, the project Applicant would be required to pay development impact fees to offset project impacts on existing public facilities, including sheriff services. Additionally, the site is already within the existing service area of LASD. The project would also be subject to site plan review by the City prior to project approval to ensure that it meets City requirements in regard to public safety (e.g., nighttime security lighting). As such, compliance with existing regulations and payment of development impact fees would reduce impacts in this regard to less than significant levels.

Mitigation Measures: No mitigation is required.

3) Schools?

Less Than Significant Impact. The Los Angeles Unified School District (LAUSD) and Compton Unified School District (CUSD) provide school services for the City of Carson. The project site is located within the LAUSD school boundary. The closest LAUSD schools in the project vicinity include Carson Street Elementary (161 East Carson Street, approximately 1.0 mile from the project site), Stephen M. White Middle School (22102 South Figueroa Street, approximately 1.6 miles from the project site), and Carson High School (22328 South Main Street, approximately 1.7 miles from the project site).[1]

The project would develop a business park campus, which could generate additional students in the project area as a result of employees and their families relocating to the City; refer to Section 4.14. According to LAUSD's *2020 Developer Fee Justification Study*, the proposed project would be required to pay $0.66 per square feet of commercial/industrial development to offset project impacts on LAUSD resources.[2] LAUSD's developer fees are allowed pursuant to Senate Bill 50. According to Section 65996 of the California Government Code, payment of statutory fees is considered full mitigation for new development projects. Thus, upon payment of required LAUSD developer fees by the project Applicant, consistent with existing State requirements, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

4) Parks?

Less Than Significant Impact. The project does not propose new or physically altered parks or recreational facilities. According to the City of Carson Parks and Recreation Department, the City maintains 12 full-service parks among

[1] Los Angeles Unified School District, *Local District South Map*, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/33/South.pdf, May 2015.

[2] Los Angeles Unified School District, *2020 Developer Fee Justification Study Los Angeles School District*, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf, March 2020, accessed December 27, 2021.

other programs and services.[3] Several are located in close proximity of the project site, including Carson Park (21411 South Orrick Avenue, approximately 0.9 mile south of the project site) and Del Amo Park (703 East Del Amo Boulevard, approximately 1.6 miles east of the project site). As discussed in Response 4.15 (a)(3) above, the proposed project could result in population growth. As such, the proposed project could increase the demand for, or use of, existing local or regional park facilities. To offset project impacts on existing public facilities or demands for new facilities including park facilities, the project Applicant would provide payment of development impact fees pursuant to Municipal Code Article XI, *Interim Development Impact Fees*. Thus, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

5) Other public facilities?

Less Than Significant Impact. The proposed project could result in increased demand for other public facilities, such as libraries, as a result of project employees and their families potentially relocating to the City. To offset project impacts on existing public facilities or demands for new facilities including library facilities, the project Applicant would be required to pay development impact fees pursuant to Municipal Code Article XI, *Interim Development Impact Fees*. Thus, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

[3] City of Carson, Community Services Parks and Recreation, *About Us*, https://ci.carson.ca.us/CommunityServices/Parks_Rec_AboutUs.aspx, accessed September 08, 2021.

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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?

Less Than Significant 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?

Less Than Significant 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)?		✓		
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?		✓		

This section is based primarily on the *Figueroa Street Business Park Project – VMT Analysis* (VMT Analysis) prepared by Kimley-Horn and Associates, Inc., dated April 11, 2023; refer to Appendix G, *VMT Analysis*.

EXISTING CONDITIONS

Existing Roadway Network

Regional access to the project site is provided by the San Diego Freeway (I-405), located immediately to the north of the project site. Local access to the project site is provided by several arterial and commuter roadways.

- Del Amo Boulevard: Del Amo Boulevard is located approximately 560 feet north of the project site. Within the project vicinity, this roadway provides three travel lanes in each east-west direction with a raised landscaped median; parking is prohibited along both sides of the street; and the posted speed limit is 40 miles per hour (mph). Del Amo Boulevard is classified as a Major Highway and is designated as a truck route in the City's *Transportation and Infrastructure Element* of the General Plan.

- Torrance Boulevard: Torrance Boulevard is located approximately 380 feet south of the project site. Within the project vicinity, it has two lanes in each east-west direction. Parking is prohibited along both sides of the street and the posted speed limit is 40 mph. Torrance Boulevard is classified as a Secondary Highway and is designated as a truck route in the City's *Transportation and Infrastructure Element* of the General Plan.

- Hamilton Avenue: West of the I-110 and the project site, Hamilton Avenue provides interchange access to the I-110 South Freeway. Within the project vicinity, it has two lanes in each north-south direction. Parking is prohibited along both sides of the street and the posted speed limit is 35 mph. Hamilton Avenue is classified as a Collector in the City's *Transportation and Infrastructure Element* of the General Plan.

- Figueroa Street: Figueroa Street is located west of the project site and would provide passenger vehicle and truck access on-site via a proposed shared driveway; refer to Section 2.4.2, *Proposed Project*, for a description of on-site circulation. Within the project vicinity, Figueroa Street provides interchange access to the I-110 northbound freeway; it has two lanes in each north-south direction with a raised median; parking is prohibited

along both sides of the street; and the posted speed limit is 40 mph. Figueroa Street is classified as a Major Highway and is designated as a truck route in the City's *Transportation and Infrastructure Element* of the General Plan.

- South Main Street: South Main Street is located east of the project site and would provide passenger vehicle and truck access on-site; refer to Section 2.4.2. Within the project vicinity, it has two lanes in each north-south direction with a raised median; parking is allowed along both sides of the street; and the posted speed limit is 40 mph. Main Street is classified as a Major Highway and is designated as a truck route in the City's *Transportation and Infrastructure Element* of the General Plan.

Existing Transit Facilities

Transit service near the project site is provided by Torrance Transit, Los Angeles Metro (LA Metro), and Amtrak.[1,2] The nearest bus stop to the project site include an Amtrak-serving bus stop located along Hamilton Avenue between West Del Amo Boulevard and West Torrance Boulevard, approximately 550 feet west of the project site. Further west, various bus stops served by Torrance Transit and LA Metro are located at the Vermont Avenue and West Torrance Boulevard intersection (Torrance Transit bus stop), and the Vermont Avenue and West Del Amo Boulevard intersection (LA Metro Route 205 and Torrance Transit bus stop).

Existing Pedestrian and Bicycle Facilities

Pedestrian sidewalks are provided along both sides of South Main Street and Figueroa Street. Based on the Carson Master Plan of Bikeways, no bicycle facilities are currently located in the project vicinity.[3]

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

Less Than Significant Impact With Mitigation Incorporated.

Roadway Facilities

Refer to Response 4.17(b) for an analysis of project impacts to roadway capacities.

Transit, Bicycle, and Pedestrian Facilities

As stated above, the closest transit facility to the project site is the Amtrak-serving bus stop located along Hamilton Avenue between West Del Amo Boulevard and West Torrance Boulevard, approximately 550 feet west of the project site. No bicycle facilities occur within the project vicinity; however, based on the Carson Master Plan of Bikeways, future bicycle facilities are planned along South Main Street (Class III Bike Route), Torrance Boulevard (Class III Bike Route), and Del Amo Boulevard (Class II Bike Lane).[4] Pedestrian facilities (sidewalk) occurs along both sides of South Main Street and Figueroa Street within the project vicinity. Construction activities associated with the project may temporarily impact these facilities as temporary partial lane closures may be required during construction; however, these roadways would remain open to traffic at all times. During periods of partial lane closures, the Applicant would be required to implement a temporary construction Traffic Management Plan (TMP) to maintain traffic flow and emergency access during the construction process (Mitigation Measure TRA-1). The TMP would include potential measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flagperson to direct traffic during heavy equipment use, among others. With implementation of

1 Torrance Transit, *System Map*, https://transit.torranceca.gov/routes-schedules/system-map, accessed December 8, 2022.
2 Amtrak, *Torrance, California*, https://www.amtrak.com/stations/toa, accessed December 8, 2022.
3 City of Carson, *Carson Master Plan of Bikeways*, August 2013.
4 Ibid.

Mitigation Measure TRA-1, the project would not conflict with existing transit, bicycle, or pedestrian facilities, and impacts would be reduced to less than significant levels.

At project completion, operations of the business park facility would not conflict with any program plan, ordinance, or policy addressing the City's existing or future transit, bicycle, or pedestrian network. Project operations would occur within the project boundary and the surrounding roadways, transit, bicycle, and pedestrian facilities would be restored to pre-project conditions upon the completion of construction. Thus, impacts would be less than significant.

Mitigation Measures:

TRA-1 Prior to project construction activities, the project Applicant shall prepare a construction Traffic Management Plan (TMP) for approval by the City of Carson Traffic Engineer. The TMP shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flagperson to direct traffic during heavy equipment use. The TMP shall specify that one direction of travel in each direction must always be maintained along South Main Street and Figueroa Street throughout project construction. Bicycle lanes, pedestrian sidewalks, and bus stops shall remain open and accessible, to the greatest extent feasible, during construction or shall be re-routed to ensure continued connectivity while maintaining Americans with Disabilities Act (ADA) accessibility. The TMP shall be incorporated into project specifications for verification prior to final plan approval.

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

Less Than Significant Impact With Mitigation Incorporated. The VMT Analysis prepared for the project follows the CEQA guidance for determining transportation impacts in accordance with Senate Bill (SB) 743. The City has not yet established VMT guidelines or thresholds for evaluating transportation impacts under CEQA; therefore, the VMT Analysis was based on the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR Technical Advisory) and the Los Angeles County Public Works *Transportation Impact Analysis Guidelines* (County Guidelines).[5,6]

The County Guidelines provides screening thresholds that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed level analysis. Screening thresholds are broken into the following three steps:

- Transit Priority Areas (TPA) Screening: Projects located within one-half mile from an existing major transit stop or an existing stop along high-quality transit corridor can be screened out. The project site is not served by any major public transit routes. Therefore, the project does not meet the criteria that would qualify it for the TPA screening.

- Low VMT-Generation Area Screening: Projects generating 16.8 percent below regional VMT average can be screened out. The County developed thresholds separately for the north and south County areas. Since the City of Carson falls in the south county, the regional average of the north county is considered for VMT screening. The existing project area VMT was calculated for the project traffic analysis zone (TAZ), which is higher than the County threshold. Therefore, the project is not screened out based on the low VMT-Generation Area screening. Table 4.17-1, *County Thresholds and Project Area VMT (Initial Screening for LOW VMT Area)*, shows the County average VMT efficiency metric and threshold based on the County guidelines.

[5] Los Angeles County Public Works, *Los Angeles County Public Works Transportation Impact Analysis Guidelines*, July 23, 2020.

[6] Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

Table 4.17-1
County Thresholds and Project Area VMT (Initial Screening for LOW VMT Area)

Land Use and Efficiency Metric	Existing South LA County Average VMT	VMT Threshold	Project Area VMT	Potentially Significant
Non-Residential: Employment VMT per Employee	18.4	15.3 (83.2 percent)	19.79	Yes
Notes: VMT = Vehicle Miles Travelled				
Source: Kimley-Horn and Associates, Inc., *Figueroa Street Business Park Project – VMT Analysis*, April 11, 2023; refer to Appendix G, *VMT Analysis*.				

- Project Type Screening: Projects generating less than 110 daily vehicle trips can assume to have a less than significant impact and screened out from further analysis. Trip generation for the existing and proposed uses was calculated based on daily and peak hourly trip generation rates obtained from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition). Based on the ITE land use descriptions, trip generation rates for Land Use 140 – Manufacturing; Land Use 150 - Warehousing; and Land Use 822 – Strip Retail Plaza were determined to adequately describe the propose uses. No trip generation credit was assumed for the existing vacant land. Table 4.17-2, *Project Trip Generation* shows the trip generation for the project. The proposed project is estimated to generate 827 daily trips, which is more than 110 daily vehicle trips and therefore is not screened out initially based on Project Type screening.

Table 4.17-2
Project Trip Generation

ITE Code	Land Use Description	Units	Quantity	Daily Total Vehicle Trips
140	Manufacturing	KSF	29,127	138
150	Warehousing	KSF	280,139	479
822	Strip Retail Plaza	KSF	4,000	210
Proposed Total				827
Source: Kimley-Horn and Associates, Inc., *Figueroa Street Business Park Project – VMT Analysis*, April 11, 2023; refer to Appendix G, *VMT Analysis*.				

A land use project needs to only meet one of the above screening thresholds to be presumed to not result in a significant impact under CEQA pursuant to SB 743. However, the project does not meet any of the criteria outlined above that would qualify it to be less than significant based on the County Guidelines; therefore, a VMT analysis was conducted to further analyze VMT impacts.

VMT Thresholds of Significance

Based on the County guidelines, a project would result in a significant project generated VMT impact if either of the following conditions are satisfied.

- Residential Projects. The project's residential VMT per capita exceeding would not be 16.8 percent below the existing Citywide residential VMT per capita.
- Office Project. The project's employment VMT per employee exceeding would not be 16.8 percent below the existing Citywide employment VMT per employee.
- Regional Serving Retail Projects. The project would result in a net increase in existing total VMT.

For other land uses such as warehouse and distribution centers, the County guidelines recommended using one of the above thresholds in consultation with the City/County staff. For the purpose of this project and in consultation with the City staff, the employment VMT per employee was used to evaluate the project VMT impacts. Accordingly, the project would result in a significant project impact if the project's employment VMT per employee is not 16.8 percent below the existing area (i.e., south Los Angeles County) employment VMT per employee.

Project Level VMT Analysis

Project VMT was derived using the most current version of the Southern California Association of Governments (SCAG) regional Travel Demand Model (TDM). The SCAG model is a trip-based model and considers interaction between different land uses based on socio-economic data such as population, households, and employment. Adjustments in socio-economic data (employment) were made to the appropriate traffic analysis zone (TAZ) within the SCAG model to reflect the project's proposed land use.

The calculation of vehicle miles traveled has two components: 1) the total number of trips generated, and 2) the average trip length of each vehicle. As the proposed project is an employment related land use, trip attractions were used from the home-based-work trip purpose matrices in the SCAG model.[7] Using the peak and off-peak person trip matrices, skim (distances) matrices, and appropriate occupancy rates, VMT was calculated for the project TAZ[8].

As stated previously, the impact threshold for the project is based on employment VMT. As shown on Table 4.17-3, *Project VMT Summary*, the proposed project would not reduce the existing project area VMT of 18.4 and would continue to be above the employee VMT trip threshold of 15.3 VMT (83.2 percent) per employee trip. Based on the VMT Analysis, the project area requires approximately 17 percent reduction in VMT to be considered as a non-significant impact. Accordingly, Mitigation Measure TRA-2 would be required to reduce VMT impacts to less than significant levels. Mitigation Measure TRA-2 would require the project Applicant prepare and submit a Transportation Demand Management (TDM) Plan to the City's Community Development Department prior to issuance of a Certificate of Occupancy. At a minimum, the TDM shall incorporate and/or consider of the following measures that aim to reduce employee VMT trips:

- Transit: Providing transit passes to employees;
- Commute Trip Reduction Program: Providing commuter incentives, transit subsidies, parking cash out, commute marketing program, and carpool/vanpool incentives;
- Commute Trip Reduction Marketing; and
- Local Hire Consideration.

VMT reduction potential based on California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity include the following:

[7] Home-base-work trips are the primary automobile trips associated with any type of employment such as the proposed project. The employment generating land use is expected to generate trips related to work as well as intermediate trips in between. The efficiency of VMT associated with home-based-work trips has been assessed based on the SCAG Travel Demand Model consistent with the County's draft guidelines.

[8] The employment-based VMT per employee is the home-based-work attraction VMT divided by total employment derived from the SCAG model. The home-based-work VMT per employee is used to measure efficiency of VMT generated by work related uses. The project area home-based-work VMT per employee for the existing and existing plus project conditions were calculated based on the SCAG model and compared to evaluate VMT impacts.

- Implement Subsidized or Discounted Transit Program: This measure would provide subsidized or discounted, or free transit passes for employees. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and thus a reduction in GHG emissions. CAPCOA Handbook shows mitigation potential of up to 5.5 percent of GHG emissions from project employee commute VMT from this measure.

- Voluntary Commuter Trip Reduction (CTR) Program: This measure would implement a voluntary commute trip reduction (CTR) program with employers. CTR programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. CAPCOA Handbook shows mitigation potential of up to 4 percent of GHG emissions from project employee commute VMT from this measure.

- Commuter Trip Reduction Marketing: This measure would implement a marketing strategy to promote the project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. CAPCOA Handbook shows mitigation potential of up to 4 percent of GHG emissions from project employee commute VMT from this measure.

- Local Hire Consideration: The effectiveness of TDM measures will depend on the tenant and it will be difficult quantify the VMT reduction for a speculative project. As such, Iin addition to the standard TDM measures, local hire considerations of incentives for hiring of employees locally is recommended, in which monitoring the residential location of workers and the number of employees that live locally would help to calculate the average employee commute trip length and determine whether the project is within the identified employee VMT trip threshold of 15.3 VMT per employee trip. The project applicant or tenant would be responsible for providing information to the City on the average commute distance of the employees if required by the City.

According to the VMT Analysis, implementation of Mitigation Measure TRA-2 would reduce the project VMT impacts to less than significant levels.

Table 4.17-3
Project VMT Summary

Land Use and Efficiency Metric	Existing South County Average VMT	Applicable VMT Threshold	Existing Plus Project Project Area VMT	Potentially Significant?
Warehouse: Employment VMT per Employee	18.4	15.3 (83.2 percent)	18.44	Yes
Notes: VMT = Vehicle Miles Travelled VMT metrics and thresholds are calculated based on the Base Year 2012 SCAG model runs.				
Source: Kimley-Horn and Associates, Inc., *Figueroa Street Business Park Project – VMT Analysis*, April 11, 2023; refer to Appendix G, *VMT Analysis*.				

Regional VMT Analysis

Regional VMT was derived using the most current version of the SCAG regional TDM. Table 4.17-4, *Project VMT Summary (Regional)*, shows the total VMT in South County for the "existing without project" and "existing with project" conditions, and resultant net change in VMT. As shown in Table 4.17-4, the proposed project would result in a reduction of VMT in the region.

Table 4.17-4
Project VMT Summary (Regional)

Region	Existing Without Project	Existing With Project	Net Change in VMT	Net Percent Change in VMT
Warehouse: Employment VMT per Employee	393,075,549	393,202,635	-127,086	-0.03 percent
Notes: VMT = Vehicle Miles Travelled VMT metrics and thresholds are calculated based on the Base Year 2012 SCAG model runs.				
Source: Kimley-Horn and Associates, Inc., *Figueroa Street Business Park Project – VMT Analysis*, April 11, 2023; refer to Appendix G, *VMT Analysis*.				

The net change in VMT in the region is expected to reduce with the proposed project. Therefore, the proposed project would have a less than significant transportation impact to the cumulative regional VMT.

Mitigation Measures:

TRA-2 Prior to issuance of a Certificate of Occupancy, a Transportation Demand Management (TDM) Plan shall be prepared by the project Applicant and approved by the City of Carson Community Development Department. At a minimum, the TDM Plan shall incorporate and/or consideration of the following measures that aim to reduce the project's overall vehicle miles traveled (VMT) impact to a less than significant level:

- Transit: Providing transit passes to employees;
- Commute Trip Reduction Program: Providing commuter incentives, transit subsidies, parking cash out, commute marketing program, and carpool/vanpool incentives;
- Commute Trip Reduction Marketing; and
- Local Hire Consideration.

VMT reduction potential based on California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity include the following:

- Implement Subsidized or Discounted Transit Program: This measure would provide subsidized or discounted, or free transit passes for employees. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and thus a reduction in GHG emissions. CAPCOA Handbook shows mitigation potential of up to 5.5 percent of GHG emissions from project employee commute VMT from this measure.
- Voluntary Commuter Trip Reduction (CTR) Program: This measure would implement a voluntary commute trip reduction (CTR) program with employers. CTR programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. CAPCOA Handbook shows mitigation potential of up to 4 percent of GHG emissions from project employee commute VMT from this measure.
- Commuter Trip Reduction Marketing: This measure would implement a marketing strategy to promote the project site employer's CTR program. Information sharing and marketing promote and

educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. CAPCOA Handbook shows mitigation potential of up to 4 percent of GHG emissions from project employee commute VMT from this measure.

- Local Hire Consideration: The effectiveness of TDM measures will depend on the tenant and it will be difficult quantify the VMT reduction for a speculative project. As such, Iin addition to the standard TDM measures, local hire considerations of incentives for hiring of employees locally is recommended, in which monitoring the residential location of workers and the number of employees that live locally would help to calculate the average employee commute trip length and determine whether the project is within the identified employee VMT trip threshold of 15.3 VMT per employee trip. The project applicant or tenant would be responsible for providing information to the City on the average commute distance of the employees if required by the City.

A report, documenting the TDM activities undertaken and their results, shall be submitted to the City of Carson Community Development Department annually, or as required by the project's environmental review under CEQA, at the responsibility of the project Applicant. The City of Carson Community Development Department Director or designee shall evaluate the overall effectiveness of all of the TDM activities and may suggest new or modified activities or substitute activities to meet the program's objectives. The City of Carson Community Development Department Director or designee may impose reasonable changes to assure the program's objectives will be met.

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. As detailed in Section 2.4, *Project Characteristics*, the project proposes the adoption of the Figueroa Street Business Park Specific Plan, which includes a Circulation Plan. The Circulation Plan provides standards and guidelines that ensure the safe and efficient movement of people and vehicles into and through the business park, addressing light trucks and passenger vehicles, heavy trucks, and non-vehicular circulation (pedestrians and bicycles). Site access would be provided via two driveways along South Main Street on the eastern portion of the site and a third driveway along Figueroa Street at the southwestern corner of the site; refer to Exhibit 2-4. The northeastern driveway along South Main Street would serve as a passenger car driveway with right-in, right-out only access. The southeastern driveway along South Main Street would serve as a shared driveway with full access for passenger cars, bobtails, and delivery trucks and right-out only restrictions for large-body trucks. The southwestern driveway along Figueroa Street would serve as a shared driveway with right-in, right-out only access.

Internal private drive aisles provide connections from perimeter streets to shared parking areas, truck docks, and building entrances. Drive aisles would have a minimum width of 26 feet subject to approval of a fire access plan by the Fire Department as part of the site plan review. It is acknowledged that fire truck turning radii and fire access requirements, as well as truck turnout requirements are integrated into the Circulation Plan. As such, the project would not introduce geometric design feature such as sharp curves or dangerous intersections that may substantially increase hazards and would not introduce incompatible uses to area roadways (e.g., farm equipment). Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

d) Result in inadequate emergency access?

Less Than Significant Impact with Mitigation Incorporated. As detailed above in Response 4.17(c), the project would utilize two driveways along South Main Street on the eastern portion of the site and a third driveway along Figueroa Street at the southwestern corner of the site; refer to Exhibit 2-4. The proposed on-site vehicular and truck access is described in Response 4.17(c), above. Drive aisles would have a minimum width of 26 feet subject to approval

of a fire access plan by the Fire Department as part of the site plan review, and applicable fire access and firetruck turning radii requirements have been integrated into the site circulation plan. As such, the project would not result in inadequate emergency access during project operation and impacts in this regard would be less than significant.

The project has the potential to impact emergency access during the short-term construction process. Temporary partial lane closures along South Main Street and Figueroa Street may be required during installation of underground utilities and potential median and driveway improvements; however, South Main Street and Figueroa Street would remain open to traffic at all times. During periods of partial lane closures, the Applicant would be required to implement a temporary construction TMP to maintain emergency access during the construction process (Mitigation Measure TRA-1). The TMP would include potential measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flagperson to direct traffic during heavy equipment use, among others. The TMP would ensure emergency access is maintained during short-term construction activities. Thus, with implementation of Mitigation Measure TRA-1, impacts would be reduced to less than significant levels in this regard.

Mitigation Measures: Refer to Mitigation Measure TRA-1

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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.

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.

Signed into law in 2004, Senate Bill (SB 18) requires that cities and counties notify and consult with California Native American tribes about proposed local land use planning decisions for the purpose of protecting traditional tribal cultural sites. Cities and counties must provide general plan and specific plan amendment proposals to tribes that have been identified by the Native American Heritage Commission (NAHC) as having traditional lands located within the lead agency's boundaries. If requested by the tribes, the lead agency must also conduct consultations with the tribes prior to adopting or amending their general and specific plans.

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.

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. In compliance with AB 52 and SB 18, the City of Carson distributed letters on February 1, 2022 to Native American tribes notifying each tribe of the opportunity to consult with the City regarding the proposed project. The tribes were identified based on a list provided by the NAHC or were tribes that had previously requested to be notified of future projects proposed by the City. The tribes had 30 days to respond to the City's request for consultation pursuant to AB 52 and 90 days pursuant to SB 18. On February 1, 2022, the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe) responded via email to let the City know that they have no concerns with the project and requested that notification be provided if in the unlikely chance a discovery of previously unknown tribal cultural resources are uncovered during ground-disturbing activities. No other responses were received during the 30-day or 90-day periods. As such, with implementation of Mitigation Measure TCR-1, impacts in this regard would be less than significant.

Mitigation Measures:

TCR-1 Upon discovery of previously unknown tribal cultural resource, all construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All tribal cultural resources unearthed by project construction activities shall be evaluated by the qualified archaeologist (refer to Mitigation Measure CUL-1). If the resources are Native American in origin, the project Contractor shall notify the Gabrieleño Band of Mission Indians-Kizh Nation (Tribe) and the Tribe shall coordinate with the property owner regarding treatment and curation of these resources. Work may continue on other parts of the project while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be made available by the Applicant. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PCR Sections 21083.2(b) for unique archaeological resources.

Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an

institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

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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?			✓	

The information presented in this analysis is based on utility correspondence conducted for the project; refer to Appendix H, *Utilities Correspondence*.

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.

Water

The project site is served by California Water Service Company Rancho Dominguez District (Cal Water). Based on the General Plan EIR, water is provided to the City from groundwater sources and treated surface water purchased from the Metropolitan Water District (MWD). Cal Water has eight connections with MWD located throughout its service area and a total of 13 wells, eight of which are located within the City of Carson. They provide recycled water purchased from the West Basin Municipal Water District (WBMWD) to several large customers for industrial use as well as for irrigation of several parks, the Victoria Golf Course and California State University, and Dominguez Hills' campus.

Cal Water maintains a number of large mains located in the City streets. The project would install a 6-inch domestic water connection line to an existing 12-inch water main in Figueroa Street and in South Main Street to serve the

proposed business park facility and on-site irrigation. Additionally, fire water services would be provided through a looped system within the on-site private drive aisles, connecting with the existing 12-inch water line. Cal Water has issued a "will serve" letter stating that Cal Water would provide water services to the site in accordance with the rules and regulations of the California Public Utility Commission (CPUC) upon compliance with all applicable City and County of Los Angeles permits, construction design requirements, and fees associated with new water connections.[1] If improvements to the existing water system is required or additional facilities are needed as a result on the proposed project, the property developer may be required to fund and/or contribute to the cost of all or portions of the needed improvements. The project Applicant will continue to coordinate with Cal Water and provide design plans, fire department requirements, and engineering fees during the final design phase of the project to determine project funds. Thus, the project would not require construction of new or expansion of existing water facilities of which would cause a substantial environmental impact. As such, a less than significant impact would occur in this regard.

Wastewater

Based on the General Plan EIR, the City of Carson owns the local sanitary sewers within the City. The Los Angeles County Department of Public Works Consolidated Sewer Maintenance District (CSMD) maintains these sewer lines. The trunk lines and treatment plant (Joint Water Pollution Control Plant) within the City are owned and operated by the Los Angeles County Sanitation Districts (LACSD). The project proposes to construct a new private on-site sewer gravity system consisting of sewer lines that connect to an existing 8-inch sewer main in South Main Street. The average wastewater flow from the project site is anticipated to be 12,550 gallons per day.[2] Wastewater generated by the proposed project would be collected by LACSD through a South Main Street Relief Trunk Sewer system. The LACSD's 42-inch diameter trunk sewer has a capacity of 20.2 million gallons per day (mgd) and conveyed a peak flow of 4.6 mgd when last measured in 2016.[3] Wastewater is treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average effluent flow of 261.1 mgd.[4]

The LACSD issued a "will serve" letter stating that LACSD would provide wastewater services to the site upon compliance with all applicable construction design requirements and fees associated with wastewater.[5] The California Health and Safety Code allows LACSD to charge a fee for connecting to LACSD's sewerage system or increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is required to construct an incremental expansion of the Sewerage System to mitigate the impact of individual projects on the present System. Additionally, a 6-inch diameter or smaller direct connection to a Districts' trunk sewer requires a Trunk Sewer Connection Permit issued by LACSD, and an 8-inch diameter or larger direct connection to LACSD's trunk sewer requires submittal of Sewer Plans for review and approval by LACSD.

Payment of standard sewer connection fees and ongoing user fees, and adherence to LACSD connection requirements would ensure that sufficient capacity is available. Therefore, it is not anticipated that project implementation would require construction of new or the expansion of existing wastewater facilities of which would cause a substantial environmental impact. Impacts would be less than significant in this regard.

Stormwater

As discussed in to Section 4.10, *Hydrology and Water Quality*, development of the proposed project would install a new drainage system to collect and convey stormwater on-site. On-site stormwater runoff would flow through the proposed catch basins and collected into a private underground storm drain system. Modular wetland units would be placed next to the catch basin to treat runoff before entering the private storm drain system. Roof drainage would also

1 California Water Service Company Rancho Dominguez District, *Will Serve Letter for APN 7336-003-043 on the East Side of Figueroa Street, north of West Torrance Boulevard, Carson, CA*, February 11, 2021.
2 Los Angeles County Sanitation Districts, *Will Serve Letter for Figueroa Street Business Park*, February 25, 2021.
3 Ibid.
4 Ibid.
5 Ibid.

be collected in the underground storm drain system. Runoff would be collected in a detention basin located on the north side of the project site before being released into the LA County Flood Control Torrance Lateral via the existing 15-inch channel connection at one of the County's existing stations. In addition to the proposed storm drain system, the site would be graded to allow overland release during a larger storm event or if an inlet or storm drain becomes clogged. The overland release flow would ultimately discharge to the northeast corner into South Main Street. Per the Los Angeles County Department of Public Works Design Division requirements, the maximum allowed discharge rate for the project would be 23.06 cubic feet per second (cfs). Runoff under the proposed detained condition would have a 50-year peak flow rate of approximately 19.19 cfs, well below the maximum allowed rate of 23.06 cfs under Los Angeles County Department of Public Works Design Division requirements and lower than the existing undetained condition of 27.17 cfs; refer to Section 4.10, *Hydrology and Water Quality*, and Appendix E, *Hydrology and Hydraulic Study*. Therefore, it is not anticipated that project implementation would require construction of new or the expansion of existing stormwater facilities of which would cause a substantial environmental impact. Impacts would be less than significant in this regard.

Dry Utilities

Electricity services would be provided by Southern California Edison (SCE) and telecommunication services would be provided by Charter Communications (Charter).[6,7] The project would result in the construction of new on-site underground dry utilities associated with electricity and telecommunication services. These new on-site lines would connect to existing utility lines along South Main Street, adjacent to the property frontage. Natural gas is provided by the Southern California Gas Company (SCGC) in the project vicinity; however, the project would not include the installation of natural gas lines on-site. As shown in Table 4.6-1, *Project and Countywide Energy Consumption*, the project's energy usage would constitute an approximate 0.006 percent increase over Los Angeles County's typical annual electricity consumption. As such, it is not anticipated that project implementation would require or result in the relocation or construction of new or expanded dry utilities. The project Applicant would continue to coordinate with SCE and Charter and provide design plans and utility maps during the final design phase of the project. Impacts would be less than significant 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?

Less Than Significant Impact. As stated in Response 4.19(a), the project site is located within the Cal Water's service area which provides wholesale potable water to eight retail agencies and 12 water systems spanning multiple cities within the County. Based on the Cal Water's *2020 Urban Water Management Plan* (UWMP), the Dominguez District would be capable of providing adequate water supply to its service area under a normal supply and demand scenario, single dry-year supply and demand scenario, and multiple dry-year supply and demand scenario through 2045; refer to Table 4.19-1, *Supplies and Demands under Different Hydrologic Conditions*.

6 Southern California Edison, *Will Serve Letter for 20610 Main Street, Carson, CA 90745*, February 17, 2021.
7 Charter Communications, Will Serve Letter for 20610 Main St Carson CA 90745, February 19, 2021.

Table 4.19-1
Supplies and Demands Under Different Hydrologic Conditions

		2025	2030	2035	2040	2045
Normal Year	Supply Totals	33,108	32,847	32,886	32,937	33,086
	Demand Totals	33,108	32,847	32,886	32,937	33,086
	Difference	0	0	0	0	0
Single-Dry Year	Supply Totals	33,683	33,416	33,455	33,507	33,659
	Demand Totals	33,683	33,416	33,455	33,507	33,659
	Difference	0	0	0	0	0
Multi-Dry Years	Supply Totals	34,038	33,768	33,808	33,860	34,014
	Demand Totals	34,038	33,768	33,808	33,860	34,014
	Difference	0	0	0	0	0
Notes: Units are in acre-feet per year.						
Source: California Water Service Company, Dominguez District, *2020 Urban Water Management Plan, Tables 4-3, Total Gross Water Use (Potable and Non-Potable) (DWR Table 4-3),* June 2021.						

Project implementation is anticipated to result in a water demand of approximately 159,874 gallons of water per day, or 179.1 acre-feet per year. The project's estimated water demand of 179.1 acre-feet per year would represent less than 0.6 percent of the City's projected water demand of 33,108 acre-feet for 2025 and 33,086 acre-feet for 2045; refer to Table 4.19-1. Further, the project would be required to comply with water efficiency standards in the 2019 California Building Energy Efficiency Standards and CALGreen. Lastly, as stated, Cal Water has issued a "will serve" letter stating that Cal Water would be able to provide water service to the site upon compliance with all applicable construction design requirements and fees associated with new water connections. As such, impacts related to water supply in this regard would be less than significant.

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?

Less Than Significant Impact. As stated in Response 4.19(a), the proposed project would result in the generation of additional wastewater above existing conditions. However, JWPCP has adequate capacity to serve the project's projected demand for wastewater treatment in addition to existing commitments. According to LACSD, the project would generate approximately 12,550 gallons of wastewater per day, which represents less than one percent of JWPCP's remaining capacity of 138.9 mgd.[8] Additionally, payment of standard sewer connection fees and ongoing user fees would ensure that sufficient capacity is available. As such, the project's potential impacts on wastewater treatment provider would be less than significant.

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. Waste Resources Inc. (Waste Resources) provides commercial solid waste collection services for the City.[9] In 2019, a total of 242,362 tons of solid waste were disposed in the 20 permitted landfills serving

[8] Los Angeles County Sanitation Districts, *Will Serve Letter for Figueroa Street Business Park*, February 25, 2021.
[9] City of Carson, Waste Management, https://ci.carson.ca.us/publicworks/solidwaste.aspx, accessed on December 13, 2021.

the City.[10] Among the 20 sites, El Sobrante Landfill, Sunshine Canyon City/County Landfill, and Chiquita Canyon Sanitary Landfill admitted the majority of the City's solid waste; refer to Table 4.19-2, *Landfills Serving the City*.[11]

Table 4.19-2
Landfills Serving the City

Landfill/Location[1]	Amount Disposed by City in 2019 (tons per day)	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Antelope Vally Public Landfill 1200 West City Ranch Road, Palmdale, CA 93551	11,139	5,548	17,911,225	4/1/2044
Chiquita Canyon Sanitary Landfill 29201 Henry Mayo Drive, Castaic, CA 91384	52,015	12,000	60,408,000	1/1/2047
El Sobrante Landfill 10910 Dawson Canyon Road, Corona, CA 91719	70,332	16,054	143,977,170	1/1/2051
Frank R. Bowerman Sanitary Landfill 11002 Bee Canyon Access Road, Irvine, CA 92618	5,582	11,500	205,000,000	12/31/2053
Lost Hills Environmental Waste Facility 14045 Holloway Road, Lost Hills, CA 93249	91,445	2,000	12,600,000	12/1/2030
Olinda Alpha Landfill 1942 North Valencia Avenue, Brea, CA 92823	2,271	8,000	17,500,000	12/31/2036
Simi Valley Landfill & Recycling Center 2801 Madera Road, Simi Valley, CA 93065	2,712	1,242[2]	82,954,873	3/31/2063
Sunshine Canyon City/County Landfill 14747 San Fernando Road, Sylmar, CA 91342	2,743	12,100	77,900,000	10/31/2037

Note:
1. Azusa Land Reclamation Co. Landfill, Clean Harbors Buttonwillow LLC, Covanta Stanislaus, Inc., Kettleman Hills - B18 Nonhaz Codisposal, Lamb Canyon Sanitary Landfill, Lancaster Landfill and Recycling Center, McKittrick Waste Treatment Site, Mid-Valley Sanitary Landfill, Prima Deshecha Landfill, San Timoteo Sanitary Landfill, Scholl Canyon Landfill, and Southeast Resource Recovery Facility are excluded from this table as these facilities accepted less than one percent of the City's solid waste in 2019 (the last available reporting year).
2. Approximate value based on conversion to tons per day (64,750 tons per week/52.143 weeks=1241.78 tons)

Sources:
CalRecycle, *SWIS Facility/Site Search*, https://www2.calrecycle.ca.gov/SolidWaste/Site/Search, accessed September 09, 2021.
CalRecycle, *Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility*, accessed December 13, 2021.
CalRecycle, *Transported Solid Waste*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Statewide/TransportedSolidWaste, accessed December 13, 2021.

Construction

The proposed project would include remediation activities and the construction of a business park campus on a vacant, capped landfill site. As existing landfills in the area accept up to 16,054 tons per day, the project's nominal disposal of materials would not result in significant impacts to the regional landfill capacity. Further, all construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal; disposal of contaminated soils and waste materials is discussed in Section 4.9, *Hazards and Hazardous Materials*. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of

[10] CalRecycle, *Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility,* https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed December 13, 2021.
[11] CalRecycle, *Transported Solid Waste*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Statewide/TransportedSolidWaste, accessed December 13, 2021.

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. The project would also be required to demonstrate compliance with the 2019 (or most recent) Green Building Code, which includes design and construction measures that act to reduce construction-related waste though material conservation measures and other construction-related efficiency measures. Compliance with these programs would ensure the project's construction-related solid waste impacts would be less than significant.

Operation

Based on the project's Air Quality and Greenhouse Gas modeling, the project is expected to generate approximately 48.42 tons of waste per year, or approximately 0.13 tons per day; refer to Appendix B, *Air Quality/Greenhouse Gas/Energy Data*. This represents less than one percent of the daily permitted throughput capacities identified in Table 4.19-2. As such, the project is not anticipated to generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. Impacts in this regard would be less than significant.

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 project construction and operation. 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, including the project site, is not designated as a very high fire hazard severity zone.[1] As such, 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).

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

Mitigation Measures: No mitigation is required.

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 consists of predominantly disturbed land, with limited (non-native) vegetation, and is located within a heavily urbanized and industrial area of the City. Based on the site's condition, no sensitive plant or animal species would be present. Thus, the project would have no impacts on sensitive plant or animal species. As indicated in Section 4.5, *Cultural Resources*, and Section 4.7, *Geology and Soils*, project implementation is not anticipated to result in impacts to cultural or paleontological resources based on the site's disturbed condition. 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. In the event that paleontological resources are encountered during project construction, Mitigation Measure GEO-1 would require all project construction activities to cease until a paleontologist, certified by the County of Los Angeles, evaluates the paleontological significance of the find and recommends a course of action. Further, as indicated in Section 4.18, *Tribal Cultural Resources*, Mitigation Measure TCR-1 would require tribal notification upon discovery of any previously unknown tribal cultural resources uncovered during ground-disturbing activities. 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 recommended mitigation measures. Implementation of mitigation measures at the project-level would reduce the potential for the incremental effects of the proposed project to be less than 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, transportation, 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. Impacts would be reduced to less than significant levels in this regard.

4.22 REFERENCES

The following references were utilized during preparation of this Initial Study/Mitigated Negative Declaration.

1. Amtrak, *Torrance, California*, https://www.amtrak.com/stations/toa, December 8, 2022.

2. California Air Resources Board, *2022 Scoping Plan for Achieving Carbon Neutrality*, November 16, 2022.

3. California Air Resources Board, *EMFAC 2017 Web Database,* https://www.arb.ca.gov/emfac/2017/, accessed August 5, 2022.

4. California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed August 31, 2021.

5. California Department of Conservation, *DOC Maps: Oil & Gas – Well Finder*, https://maps.conservation.ca.gov/oilgas/, accessed September 09, 2021.

6. California Department of Conservation, *Los Angeles County Williamson Act FY 2016/2017 Map*, updated 2019.

7. California Department of Conservation, *Special Report 143: Part IV Mineral Land Classification of the Greater Los Angeles Area, Part IV Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region*, 1982.

8. California Department of Conservation, *Special Report 209: Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California*, 2010.

9. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2021-2022, with 2020 Benchmark*, Sacramento, California, May 2022.

10. California Department of Fish and Wildlife, *California Natural Community Conservation Plans*, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, April 2019.

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

12. California Department of Transportation, *California State Scenic Highway System Map*, https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983, accessed September 09, 2021.

13. California Department of Water Resources, *SGMA Basin Prioritization Dashboard*, https://gis.water.ca.gov/app/bp-dashboard/p2/, accessed December 28, 2021.

14. California Department of Resources Recycling and Recovery, *Green Building Materials*, https://www.calrecycle.ca.gov/greenbuilding/materials, accessed December 27, 2021.

15. California Energy Commission, *2019 Building Energy Efficiency* Standards, March 2018.

16. California Energy Commission, *2020 Integrated Energy Policy Report Update*, https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update, accessed August 3, 2022.

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5.0 INVENTORY OF MITIGATION MEASURES

AIR QUALITY

AQ-1 In compliance with South Coast Air Quality Management District (SCAQMD) Rule 2305 – Warehouse Indirect Source Rule, the project Applicant shall submit an Initial Site Information Report to SCAQMD no later than July 1, 2024, and the first annual Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program Report no later than January 31, 2025. The WAIRE Program Report shall be prepared and submitted to SCAQMD annually thereafter. Starting no later than January 1, 2024, the project Applicant shall implement emission reduction measures to achieve the required number of points each operating year pursuant to SCAQMD Rule 2305.

AQ-2 Prior to the issuance of the Occupancy Permit, the project Applicant or its designee shall submit documentation to the satisfaction of the City of Carson Director of Community Development demonstrating that the following feature has been implemented if project operations include agricultural/farming:

- The indoor agriculture/farming operation shall have an air treatment system that ensures off-site odors shall not result from its activities. This requirement at a minimum means that the indoor agriculture/farming operation shall be designed to provide sufficient odor-absorbing ventilation and exhaust systems so that any odor generated inside the location of the indoor agriculture/farming operation is not detected outside the building, on adjacent properties or public rights-of-way.

CULTURAL RESOURCES

CUL-1 Unanticipated Discovery of Cultural Resources. If previously unidentified cultural/archaeological resources are encountered during ground-disturbing activities, 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 may be warranted to mitigate any significant impacts. In the event that an identified cultural resource is of Native American origin, the qualified archaeologist shall consult with the project Applicant and City of Carson Planning Division to implement Native American consultation procedures. Construction shall not resume until the qualified archaeologist states in writing that the proposed construction activities would not significantly damage any archaeological resources.

GEOLOGY AND SOILS

GEO-1 Unanticipated Discovery of Paleontological Resources. If evidence of subsurface paleontological resources is found during ground-disturbing construction activities, excavation and other construction activities 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, the Applicant shall retain a paleontologist certified by the County of Los Angeles to evaluate the find prior to resuming ground-disturbing activities 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.

NOISE

NOI-1 To reduce noise levels during construction activities, the project Applicant shall demonstrate, to the satisfaction of the City of Carson Community Development Director, that the project complies with the following:

- Construction contracts shall specify that all construction equipment, fixed or mobile, are equipped with properly operating and maintained mufflers and other State-required noise attenuation devices.

- A sign, legible at a distance of 50 feet, shall be posted at the project construction site providing a contact name and a telephone number where residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator shall be identified to address construction noise concerns received. The coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City. All signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator.

- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.

- Per Section 5502 (c) of the *Carson Municipal Code*, construction shall be limited to the hours between 7:00 a.m. and 8:00 p.m. daily (except Sundays and legal holidays). All construction activities shall be prohibited at night (between 8:00 p.m. and 7:00 a.m.) and on Sundays and legal holidays.

NOI-2 Prior to grading permit issuance, the project Applicant shall demonstrate, to the satisfaction of the City of Carson Building Official, that the construction plans require a temporary noise barrier or enclosure during all phases of construction that meets the following conditions:

- The temporary noise barrier or enclosure shall be used along the eastern property line to break the line-of-sight between the construction equipment and the sensitive receptors to the east of the project site.

- The temporary noise barrier shall have a sound transmission class (STC) of 20 or greater in accordance with American Society for Testing and Materials Test Method E90, or at least 2 pounds per square foot to ensure adequate transmission loss characteristics. In order to achieve this, the barrier may consist of 3-inch steel tubular framing, welded joints, a layer of 18-ounce tarp, a 2-inch-thick fiberglass blanket, a half-inch-thick weatherwood asphalt sheathing, and 7/16-inch sturdy board siding with a heavy duct seal around the perimeter.

- The Contractor shall ensure the length, height, and location of noise control barrier walls are adequate to assure proper acoustical performance. This shall be achieved by the following requirements:

    - The noise control barrier must physically fit in the available space, must completely break the line-of-sight between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source and extend length-wise and vertically as far as feasibly possible to be most effective.

- In addition, to avoid objectionable noise reflections, the source side of the noise barrier shall be lined with an acoustic absorption material meeting a noise reduction coefficient rating of 0.70 or greater in accordance with American Society for Testing and Materials Test Method C423. All noise control barrier walls shall be designed to preclude structural failure due to such factors as winds, shear, shallow soil failure, earthquakes, and erosion.

NOI-3 Prior to issuance of a grading permit, the project Applicant shall prepare a grading control plan to ensure that project-related grading activities do not result in damage to off-site southern light industrial structures. The grading control plan shall be subject to the City of Carson Building and Safety Department's approval prior to issuance of a grading permit. To reduce groundborne vibration levels, the grading control plan shall stipulate that small sonic pile drivers are used as an alternative to impact pile drivers within 75 feet of the off-site southern light industrial structures.

TRANSPORTATION

TRA-1 Prior to the initiation of construction, the project Applicant shall prepare a construction Traffic Management Plan (TMP) for approval by the City of Carson Traffic Engineer. The TMP shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flagperson to direct traffic during heavy equipment use. The TMP shall specify that one direction of travel in each direction must always be maintained along South Main Street and Figueroa Street throughout project construction. Bicycle lanes, pedestrian sidewalks, and bus stops shall remain open and accessible, to the greatest extent feasible, during construction or shall be re-routed to ensure continued connectivity while maintaining Americans with Disabilities Act (ADA) accessibility. The TMP shall be incorporated into project specifications for verification prior to final plan approval.

TRA-2 Prior to issuance of a Certificate of Occupancy, a Transportation Demand Management (TDM) Plan shall be prepared by the project Applicant and approved by the City of Carson Community Development Department. At a minimum, the TDM Plan shall incorporate and/or consideration of the following measures that aim to reduce the project's overall vehicle miles traveled (VMT) impact to a less than significant level:

- Transit: Providing transit passes to employees;
- Commute Trip Reduction Program: Providing commuter incentives, transit subsidies, parking cash out, commute marketing program, and carpool/vanpool incentives;
- Commute Trip Reduction Marketing; and
- Local Hire Consideration.

VMT reduction potential based on California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity include the following:

- Implement Subsidized or Discounted Transit Program: This measure would provide subsidized or discounted, or free transit passes for employees. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and thus a reduction in GHG emissions. CAPCOA Handbook shows mitigation potential of up to 5.5 percent of GHG emissions from project employee commute VMT from this measure.
- Voluntary Commuter Trip Reduction (CTR) Program: This measure would implement a voluntary commute trip reduction (CTR) program with employers. CTR programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. CAPCOA Handbook shows mitigation potential of up to 4 percent of GHG emissions from project employee commute VMT from this measure.

- Commuter Trip Reduction Marketing: This measure would implement a marketing strategy to promote the project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. CAPCOA Handbook shows mitigation potential of up to 4 percent of GHG emissions from project employee commute VMT from this measure.

- Local Hire Consideration: The effectiveness of TDM measures will depend on the tenant and it will be difficult quantify the VMT reduction for a speculative project. As such, lin addition to the standard TDM measures, local hire considerations of incentives for hiring of employees locally is recommended, in which monitoring the residential location of workers and the number of employees that live locally would help to calculate the average employee commute trip length and determine whether the project is within the identified employee VMT trip threshold of 15.3 VMT per employee trip. The project applicant or tenant would be responsible for providing information to the City on the average commute distance of the employees if required by the City.

A report, documenting the TDM activities undertaken and their results, shall be submitted to the City of Carson Community Development Department annually, or as required by the project's environmental review under CEQA, at the responsibility of the project Applicant. The City of Carson Community Development Department Director or designee shall evaluate the overall effectiveness of all of the TDM activities and may suggest new or modified activities or substitute activities to meet the program's objectives. The City of Carson Community Development Department Director or designee may impose reasonable changes to assure the program's objectives will be met.

TRIBAL CULTURAL RESOURCES

TCR-1 Upon discovery of previously unknown tribal cultural resource, all construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All tribal cultural resources unearthed by project construction activities shall be evaluated by the qualified archaeologist (refer to Mitigation Measure CUL-1). If the resources are Native American in origin, the project Contractor shall notify the Gabrieleño Band of Mission Indians-Kizh Nation (Tribe) and the Tribe shall coordinate with the property owner regarding treatment and curation of these resources. Work may continue on other parts of the project while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be made available by the Applicant. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PCR Sections 21083.2(b) for unique archaeological resources.

Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

6.0 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 Figueroa Street Business Park Project. We find that the proposed project could result in potentially significant environmental impacts, but that mitigation measures have been identified that reduce such impacts to less than significant levels. We recommend that the second category be selected for the City of Carson's determination (see Section 7.0, *Lead Agency Determination*).

May 10, 2023
Date

Jessica Ditto, Project Manager
Michael Baker International

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7.0 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: _____

Title: Senior Planner

Printed Name: McKina Alexander

Agency: City of Carson

Date: May 10, 2023

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